

Meeting of:	Shared Regulatory Services Joint Committee
Date of Meeting:	Wednesday, 25 September 2024
Relevant Scrutiny Committee:	Homes and Safe Communities
Report Title:	Shared Regulatory Services Food and Feed Law Enforcement Service Plan 2024/25
Purpose of Report:	To seek approval for the Food and Feed Law Enforcement Service Plan for the Shared Regulatory Service for 2024/25
Report Owner:	Director of Environment and Housing Services
Responsible Officer:	Head of Shared Regulatory Services
Elected Member and Officer Consultation:	No Elected Members have been consulted. The following officers have been consulted ; Assistant Director, Cardiff Council, Chief Officer Legal, Regulatory and Human Resources, Bridgend County Borough Council
Policy Framework:	This is a matter delegated to the Joint Committee
Executive Summary:	<ul style="list-style-type: none"> The report appraises the Committee of the work of the Shared Regulatory Service in respect of Food and Feed law. The report requests the Committee to approve the Food and Feed Law Enforcement Service Plan for the Shared Regulatory Service for 2024/25.

Recommendations

- 1.** Approve the 2024/25 Food and Feed Law Enforcement Plan.
- 2.** Authorise the Head of the Shared Regulatory Services to make administrative amendments to the 2024/25 Food and Feed Law Enforcement Service Plan should the need arise.

Reasons for Recommendations

- 1.** The Food Standards Agency requires all Local Authorities to produce and approve an annual plan that sets out how it will discharge its statutory responsibilities under the relevant legislation
- 2.** To ensure the plan remain up to date should any changes in law or best practice be introduced during the period.

1. Background

- 1.1** The Councils have a duty, which has been delegated to the Joint Committee, to enforce the Food Safety Act 1990; the Official Food and Feed Controls (Wales) Regulations 2009 and a wide variety of other food / feed legislation including the Food Hygiene (Wales) Regulations 2006.
- 1.2** As part of the Food Standards Agency's Framework agreement the Councils are required to produce a Food Safety Service Plan setting out the arrangements in place to discharge these duties. This Food and Feed Law Enforcement Service Plan is produced in response to that requirement and is designed to inform residents, businesses and other stakeholders in the region of the arrangements the Councils have in place to regulate food safety.
- 1.3** A copy of the draft Food & Feed Law Enforcement Service Plan for 2024/25 for the Shared Regulatory Service has been attached to this report as Appendix 1.
- 1.4** The Service Plan details how the Shared Regulatory Service will fulfil the major purpose of ensuring the safety and quality of the food chain to minimise risk to human and animal health.
- 1.5** To achieve this, the Councils will conduct inspections in accordance with the intervention programme, carry out investigations including dealing with complaints, provide advice/education and provide guidance on what the law requires, undertake sampling and take enforcement action where appropriate.

- 1.6 The plan details the demands on the service, the risk based work programme and the resources available to deliver the required work. As with many other Council services the service faces increasing demands with reducing resource.
- 1.7 The plan explains the Food Standards Agency expectations of Local Authorities, some of the achievements in 2023/24, and the challenges for the year ahead.

2. Key Issues for Consideration

- 2.1 The Food Standards Agency framework agreement sets out the expectations placed upon local authorities and their delivery of official controls on feed and food law. The agreement sets out the planning and delivery requirements of feed and food official controls, based on the statutory code of practice.
- 2.2 A requirement within the framework is that local authorities carry out interventions at all food hygiene, food standards and feeding stuffs establishments in their area at specified frequencies.
- 2.3 The Food Standards Agency has the power to inspect local authorities to determine the Council's performance against the standard.

3. How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?

- 3.1 The Well-being of Future Generations Act requires the SRS to underpin decision making by contributing to the seven well-being goals of the Act, following the five ways of working, and consequently undertaking actions that will have a positive impact on people living in the future as well as those living today. Consequently SRS seeks to work in the following ways:
 - Looking to the long term
 - Taking an integrated approach;
 - Involving a diversity of the population in the decisions affecting them;
 - Working with others in a collaborative way to find shared sustainable solutions
 - Acting to prevent problems from occurring or getting worse.

4. Climate Change and Nature Implications

- 4.1 One of the key strategic themes for the Shared Regulatory Service is *Protecting the Local Environment*.

- 4.2** The SRS Business Plan articulates the work carried out under this theme to deliver on the corporate priorities for the participant Councils, including their ambitions to minimise climate change and impacts on the natural environment.
- 4.3** In this context, the Joint Committee is regularly updated on the contribution of SRS to this agenda, for example through its work in the areas of animal health and welfare, air quality, contaminated land, energy efficiency in the private rented sector and investigating greenwashing claims or environmental fraud.

5. Resources and Legal Considerations

Financial

- 5.1** The Participants' contribution towards the Shared Regulatory Service is recharged on a quarterly basis, based upon the approved budgets for 2024/25. Accounting for the full year is reported to the Committee at the Annual General Meeting.

Employment

- 5.2** There are no immediate employment implications associated with this report.

Legal (Including Equalities)

- 5.3** Under Section 41 of the Food Safety Act 1990, as amended by paragraph 18 of Schedule 5 of the Food Standards Act 1999, the Food Standards Agency can require Food Authorities to provide them with reports and information regarding the Authorities enforcement of the Act. Local Authorities are required to supply them with statistical information on inspections, prosecutions, official samples and informal samples.

6. Background Papers

- Appendix 1 Draft Food and Feed Law Enforcement Service Plan 2024/25.

Shared Regulatory Services



Food Hygiene
and Standards

Food and Feed Law

Service Plan

2024/25



Shared
Regulatory
Services



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Introduction

Shared Regulatory Services (SRS) is a collaborative service formed between Bridgend, Cardiff and the Vale of Glamorgan Councils on 1st May 2015. The SRS delivers a fully integrated service under a single management structure for Trading Standards, Environmental Health and Licensing functions with shared governance arrangements ensuring full elected member involvement.

Local authorities have a duty to enforce the Food Safety Act 1990, the Official Food and Feed Controls (Wales) Regulations 2009 and a vast array of food and feed legislation including the Food Hygiene (Wales) Regulations 2006 and as part of the Food Standards Agency's Framework Agreement are required to produce a Food and Feed Service Plan setting out the arrangements it has in place to discharge this duty. This Food and Feed Law Enforcement Service Plan, is produced in response to that requirement and is designed to inform residents, the business community and the wider audience, of the arrangements Bridgend, Cardiff and the Vale of Glamorgan has in place to regulate food and feed safety. It also shows how these activities contribute to and support others in delivering corporate objectives to the community as a whole.

The Service Plan details how the Food and Feed Service will fulfil the major purpose of ensuring the safety and quality of the food chain to minimise risk to human and animal health. To achieve this, officers from the Shared Regulatory Service will provide advice, education and guidance on what the law requires, conduct a programme of interventions, investigations, sampling and take enforcement action where appropriate. This Plan is therefore designed to both meet the requirements laid down by the Food Standards Agency and to clearly show how through encouragement, regulation and enforcement, food and feed safety will be delivered across the region and identifies the resources available to do this.

This service plan therefore outlines our current arrangements and proposed interventions and actions to be delivered during the year. Whilst these may be subject to change, we remain committed to protecting and improving the health of people across the region.

Any deviations from the plan will be done in accordance with guidance provided by the Food Standards Agency. We will also ensure our approach to enforcement is risk based and will ensure that stakeholders are kept updated of our intentions and progress.

Christina Hill
Operational Manager Commercial Services

1. Service Aims and Objectives

1.1 Aims and objectives

The Food and Feed Safety Service is committed to improving the safety and quality of the food chain and to demonstrate this, the Service has adopted the following aims and objectives.

The overall aim of the Service is to:-

Protect public health by ensuring that food for human or animal consumption is without risk to the health and safety of consumers, and is labelled and described accurately.

To achieve this, the service has adopted the following 12 key delivery priorities:-

- Meet the 'The Standard' outlined in the Framework Agreement on Local Authority Food Law for enforcement of food hygiene, food standards and/or feed legislation.
- Ensure that all food and feed premises receive an intervention in accordance with relevant statutory codes of practice.
- Investigate food and feed complaints.
- Develop Primary Authority partnerships with businesses and respond to enquiries from other enforcing authorities.
- Provide advice to consumers and business on food and feed matters and respond to all enquiries for service within specified target times.
- Maintain an adequate food and feed inspection and sampling programme.
- Ensure that food and feed imported into the European Union through the Port of Cardiff, Barry and Cardiff International Airport meet legal requirements and are subject to checks.
- Control and investigate sporadic and outbreak cases of food poisoning and food related infectious disease.
- Investigate, initiate and respond to food alerts and incidents.
- Work with other food and feed authorities and professional bodies to ensure consistency of food and feed safety enforcement.
- Promote food and feed safety and standards.
- Take appropriate enforcement action proportionate to the degree of risk to public health and in accordance with the Food Hygiene Rating Scheme.

1.2 Links to Corporate Objectives and Strategic Plans

As a regional organisation providing regulatory services across three local authority areas, we place the **corporate priorities** and outcomes of the three councils at the heart of all that we do (Appendix D). In developing our own strategic priorities and outcomes for Shared Regulatory Services (Appendix E), we have considered the priorities of all the three authorities, together with the needs and aspirations of our partners and customers so they translate into priorities that meet local needs.



SRS priorities particularly relevant to the delivery of the food and feed controls are :-

Improving health and wellbeing Amongst other factors impacting on health, the quality of the food we eat, the standards to which it is produced and the environment in which it is prepared, are central to people's health.

Food hygiene and food standards enforcement strives to ensure that food and drink is accurately described and labelled, meets the required food standards and is prepared in a safe environment. Food hygiene controls and inspections seek to minimise the risk to consumers of food borne infection.

Safeguarding the vulnerable The role of the food service plays a vital part in safeguarding the vulnerable, particularly in relation to educational and care homes settings. Good nutrition and safe food are essential to everyone's short and long term health and wellbeing which is further enhanced in terms of vulnerable adults and children. The enforcement of food regulations ensures that food provided in these settings are safe, therefore protecting our vulnerable residents.

Supporting the local economy The provision of timely advice and guidance on food safety and food standards legislation can benefit the economic viability of businesses. Failure of a food producer to correctly label foods can, for example lead to costly re-labelling of inaccurately described foods and it is essential for producers to be fully acquainted with the legislation that applies to their products and the hygiene standards they need to comply with when producing the food. The equitable enforcement of regulations helps to maintain a level playing field, allowing businesses to compete on equal terms.

Nationally the service also contributes to the **National Enforcement Priorities for Wales** for local regulatory delivery which highlight the positive contribution that regulatory services, together with local and national partners, can make in delivering better outcomes:-

- Protecting individuals from harm and promoting health improvement
- Ensuring the safety and quality of the food chain to minimise risk to human and animal health
- Promoting a fair and just environment for citizens and business

- Improving the local environment to positively influence quality of life and promote sustainability.

The Local Public Health (medium term) Plan 2020-2023 - Published as part of the Local Public Health Strategic Framework the Local Public Health Plan provides details of how local Public Health teams work in partnership to improve and protect the health and well-being of the local population. The Plan sets out several priority work areas and actions necessary to achieve improvement which the Food and Feed Service contribute to through its various activities.

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2. Background

2.1 Area profile

Shared Regulatory Services covers the Council areas of Bridgend, Cardiff and the Vale of Glamorgan and serves over 650,000 residents. Extending from St Mellons in the east to Maesteg in the west, the area encompasses Cardiff, the capital City of Wales with its array of cultural, financial and commercial organisations and the rural areas of Bridgend and the Vale of Glamorgan with their vibrant tourist and agricultural economies.



Bridgend is situated on the south coast straddling the M4 corridor. It comprises an area of 28,500 hectares and a population of just over 140,000 residents. To the north of the M4, the area consists of mainly ex-coal mining valley communities with Maesteg as the main centre of population. To the south of the M4, the ex-market town of Bridgend is the largest town, the hub of the economy and its employment base. To the south west on the coast lies Porthcawl, a traditional seaside resort, with a high proportion of elderly residents, which is subject to a major influx of tourists during the summer period.



Cardiff is the capital city of Wales and is continuing to grow faster than any other capital city in Europe. In population terms, it is the largest city in Wales with a population of 370,000. Population alone however, does not fully represent Cardiff's significance as a regional trading and business centre as the population swells by approximately 70,000 daily with commuters and visitors. Cardiff is the seat of government and the commercial, financial and administrative centre of Wales. Cardiff boasts one of the most vibrant city centres in the UK and on a typical weekend, Cardiff's night time economy can attract over 40,000 people and sometimes more than 100,000 when the Principality Stadium hosts international events.



The Vale of Glamorgan is bounded to the north by the M4 motorway and to the south by the Severn Estuary. It covers 33,097 hectares with 53 kilometres of coastline, and a population of over



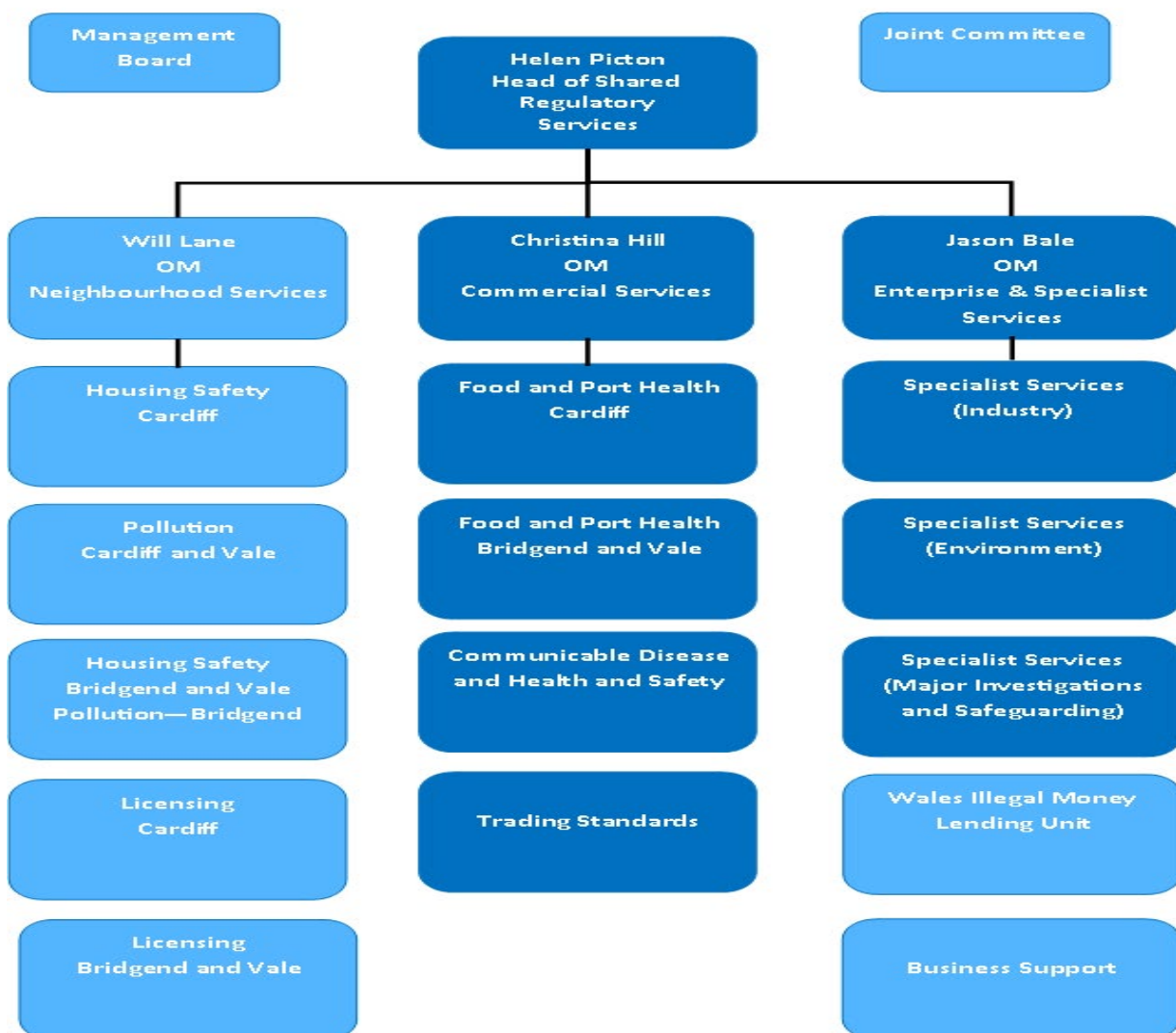
130,000 residents. The area is predominantly rural in character, but contains several urban areas of note such as Barry, Penarth, Dinas Powys and the historic towns of Cowbridge and Llantwit Major. Barry is the largest town, a key employment area and popular seaside resort. The rural parts of the Vale provide a strong agricultural base together with a quality environment, which is a key part of the area's attraction. The area includes Barry Docks and Cardiff International Airport.

2.2 Organisational structure

Food and Feed Services are provided by the Commercial Services and Enterprise and Specialist Services Teams within Shared Regulatory Services. The Teams consist largely of Environmental Health and Trading Standards Officers delivering services across the three areas. The Vale of Glamorgan Council act as the host authority for the Service with functions associated with this Plan delegated to the Shared Service Joint Committee.

Commercial Services deal with food safety, port health, health improvement and communicable disease, feed safety, food standards, food labelling in retail premises, whilst Enterprise and Specialist Services deal with these activities in non-retail premises together with feed safety and feed standards and where they arise, major investigations. Operational functions within the Service are illustrated in the following table with those that have responsibility for food and feed matters are highlighted in darker blue.

Shared Regulatory Services Organisational Chart



2.3 Scope of the Food and Feed Service

The Food and Feed Service of Shared Regulatory Services is responsible for providing a comprehensive food and feed service combining education, advice and enforcement. The scope of the Food and Feed Service includes:-

- Undertaking of food hygiene, food standards, feed and agricultural inspections;
- Investigating complaints;
- Implementing the Food Sampling programme;
- Implementing the FSA Feed Sampling Programme;
- Provision of education, training and advice on food and feed issues;
- Investigating cases of communicable disease including food poisoning;
- Responding to Food Standards Agency alerts as appropriate;
- Implementing the National Food Hygiene Rating Scheme;
- Port health;
- Approval of product specific establishments and feed businesses.

Responsibility

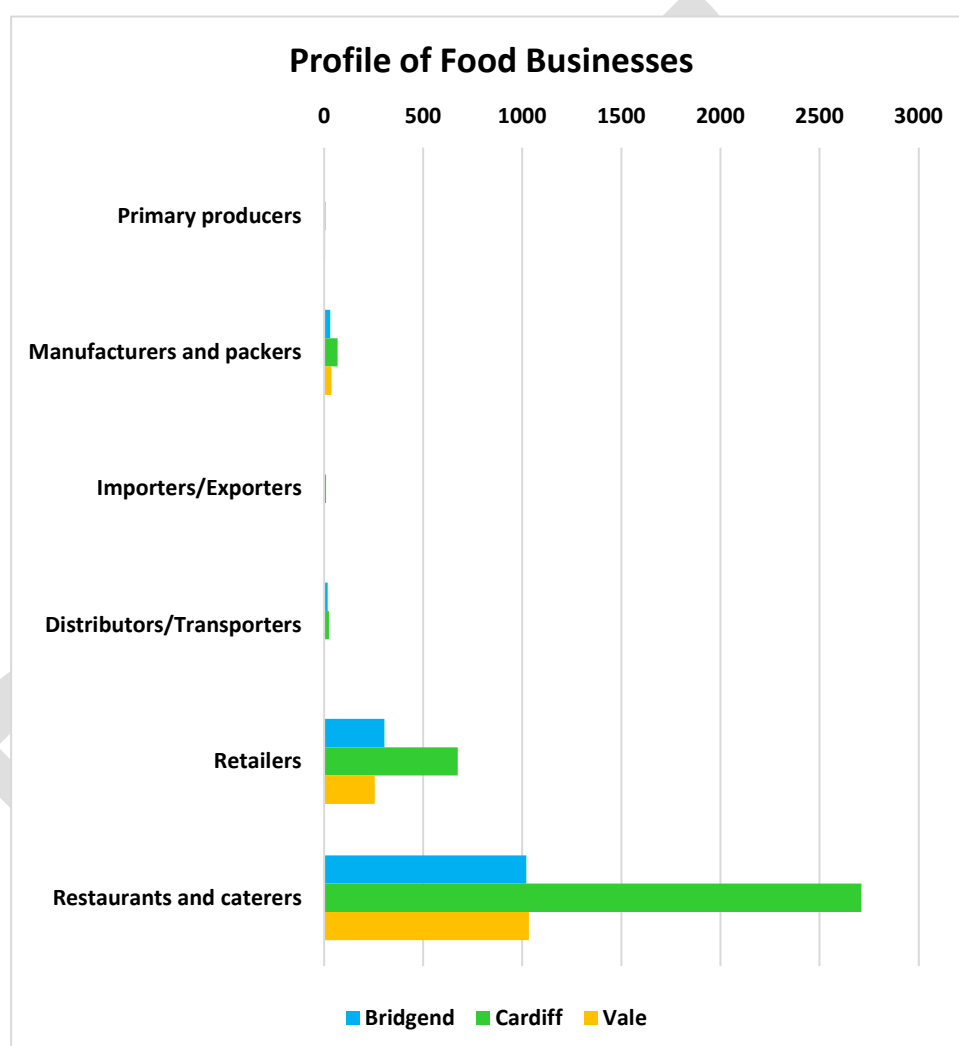
Responsibility for food safety activities is broken down as follows:-

Team	Responsibility
Food and Port Health Teams (Commercial Services)	Food Safety Intervention programme in retail and catering businesses
	Complaints and requests for service for retail and catering businesses
	Food sampling at retail and catering businesses
	Food Safety alerts and incidents
	National Food Hygiene Rating Scheme
	Port Health
	Imported food control
	Food standards in low to medium risk businesses
Trading Standards (Commercial Services)	Feed safety and standards at commercial premises
	Food Standards inspection programme in high risk retail and catering businesses
	Complaints and requests for service
	Food and feed sampling at retail premises
	Food and feed safety alerts and incidents
	Responsible for the registration/approval of feed premises.
Communicable Disease Team (Commercial Services)	Communicable disease
Industry (Enterprise and Specialist Services)	Food Safety and Standards Intervention programme at manufacturing and packing premises, distributors and primary producers.
	Complaints and requests for service
	Approval of product specific establishments
	Fee Paying Advice Visits (Food Standards & Food Safety)
	Feed safety and standards during manufacture
	Food and Feed Sampling at manufacturing premises
	Co-ordination of Events Panel attendance/follow up
	Provision of training courses for businesses
	Primary Production
Environment (Enterprise and Specialist Services)	Feed safety and standards on farms
	Complaints and requests for service
	Feed Sampling
	Inspection
	Feed safety alerts and incidents
Major investigations (Enterprise and Specialist Services)	Investigation of any large scale investigation involving food or feed

2.4 Demands on the Food and Feed Service

2.4.1 Food Safety

The region has approximately 6207 food premises with Bridgend having approximately 1377 premises, Cardiff approximately 3494 premises and the Vale of Glamorgan 1336. All require a range of interventions. The following tables provide a profile of the food premises within the three areas by type. Food business operators must register their businesses with the food authority except where the establishment requires approval. Of the 6207 identified food businesses 22 are approved (6 Bridgend, 11 Cardiff and 5 Vale).



2.4.2 Feed Safety

Feed safety is a vitally important element of controlling food safety and this service takes a holistic view ensuring compliance from farm to fork; regulating feed that is fed to animals that eventually enters the food chain. The legislation requires that premises involved in the feed chain producing, trading in or using animal feed must be registered with local authorities; and those that manufacture complex feeds have to be specifically approved. The businesses described include livestock farms, livestock farms which mix feed using additives, arable farms that grow, use or sell crops for feed

use, fish farms, surplus food suppliers i.e. businesses supplying food e.g. bread suitable for re-entering the feeding stuffs market, co-product producers e.g. a by-product of a manufacturing process such as brewers grains which can be used in animal feed, transporters of feed, manufacturers of feeding stuffs including pet food, stores and distributors such as animal feed merchants.

The Feed Law Code of Practice issued in October 2014 requires that inspection of animal feed premises are in line with a risk based approach. There are currently 767 registered feed premises, 309 in Bridgend, 86 Cardiff and 372 in the Vale of Glamorgan. Bridgend and the Vale of Glamorgan are principally rural areas dominated by livestock farming and these businesses although high in number are primarily low risk feed premises. The high risk feed premises such as manufacturers, distributors and surplus food suppliers are situated within Cardiff and the larger towns of Bridgend and the Vale of Glamorgan. There are 86 registered feed premises in Cardiff with the majority being retail premises supplying surplus food for the production of feed. The profile of these premises can be found below.



2.4.3 Service delivery points

Food and feed related services are delivered from 3 service delivery points and while the service primarily operates office hours from Mondays to Fridays, weekend and out of business hours duties are carried out as the need arises. Shared Regulatory Services also operates an out of hours duty officer scheme for emergency situations.

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<http://www.srs.wales>

Bridgend

Civic Offices
Angel Street
Bridgend
CF31 4WB

Normal offices hours:

Monday to Thursday: 8.30am to 5.00pm

Friday: 8.30 am to 4.30pm

Cardiff

Level 1
County Hall
Cardiff
CF10 4UW

Normal office hours:

Monday to Thursday: 8.30am to 5.00 pm

Friday: 8.30 am to 4.30pm

Vale of Glamorgan

Civic Offices
Holton Road
Barry
CF63 4RU

Normal offices hours:

Monday to Thursday: 8.30am to 5.00pm

Friday: 8.30am to 4.30pm

2.4.4 External Factors and emerging issues impacting on the Service

Delivering SRS in the future – The creation of SRS reflected the Welsh Government collaboration agenda, with one of the main drivers being to realise significant cost savings. These, and subsequent savings have been made by SRS over the years and we continue to deliver the SRS with a reducing resource. Over time SRS has taken on additional responsibilities under new legislation and areas of regulation and any further reductions will require the need to further examine and introduce new ways of prioritising our services which may result in a reduction in service provision, or the charging for some services and difficult decisions about the level of service provision. We will however seek to measure activities and outcomes to ensure performance is managed effectively and in a meaningful way.

With this in mind, the way in which food standards is delivered has required realignment to ensure the food standard programme is met in accordance with the Food Law Code of Practice. Following significant training of staff, food safety teams now deliver some food standards services. This new approach has resulted in inspections delivering both hygiene and standards matters ensuring

businesses are compliant in all aspects of food safety and standards.

The Trading Standards team continue to deliver a service in respect of food standards, however this is a focused programme on high risk areas which will take into account local intelligence whilst continuing to have regard to the Food Law Code of Practice.

Income streams already exist within the Service however there will be a need to extend these opportunities. Income generation provides a means to offset some of the likely budget reductions that the service will face over the coming years and will be generated through a number of activities. This includes the development of products and services that can be sold to businesses, offering to provide services to other local authorities and could include expanding the partnership to include new partners.

Retention of staff – We have always committed to the resourcing of training to develop people within the organisation to ensure competency within their roles. Our focus however has been more toward the immediate needs of officers to enable delivery of our five strategic priorities. It is clear that a longer term strategy for recruitment and retention is needed as SRS, in common with regulatory services across Wales, experiences difficulty in recruiting and retaining staff. The cause of the problem appears to be multi-faceted, with factors such as a limited pool of qualified staff, accessibility of the professional qualifications and an ageing workforce all contributing to something of a perfect storm. SRS has been at the forefront of taking forward the Directors of Public Protection Wales 'Building for the Future' strategy, and in making the case to Welsh Government for a regulatory apprenticeship in Wales to create a route into regulatory services for young people. The creation of a recruitment strategy and the development of retention "initiatives" will be a key target during 2024/25.

Meeting the required frequency of food inspections – The Food Standards Agency Food Law Code of Practice sets out the criteria that local authority food law regulatory services need to follow and stipulates the required frequency of food business inspections according to risk, with those of a higher risk requiring more frequent inspections. For example those rated as Category A, require inspections every 6 months, Category B annually and Category C every 18 months etc. While SRS successfully inspected those businesses with the highest ratings (A, B and C) during the last year, this was only made possible through the appointment of contractors to support existing Food Officers in completing these inspections which also consisted of a significant backlog of C rated inspections. There are certain unique challenges facing SRS in delivering the full food hygiene and standards programmes which result from the sheer number of food businesses within our footprint (around 20% of all those in Wales), the diverse and vibrant nature of the food scene locally, and the very frequent churn of new business start ups. A number of other factors have also emerged post pandemic which add to the challenges faced, including the significant increase in enforcement action necessary at food premises and the increase in pests, which impact Officers' ability to carry out inspections and programmed work. In addition, officers are dealing with many cases where standards have deteriorated; while an increase in new and different cuisines being offered at food businesses requires officers to research and understand these new approaches so that appropriate advice can be given and action taken if required. Given that the Food service within SRS is not adequately resourced to undertake current programmes of inspection without the aid of contractors, this presents a significant risk for SRS in balancing current budgetary pressures with the need to meet specific requirements of the Food Law Code of Practice, the failure of which could lead to the service being placed in 'special measures'.

New Food Businesses – Food businesses are required to register with the service if a new business

is planned, the nature of an existing business changes or if there is a change of ownership following the creation of new legal entities such as a new limited company, sole trader and partnership. All new businesses are required to be inspected and the Food Law Code of Practice requires that where possible, they be inspected within 28 days of opening. This requirement places a significant impact on the resources of the Food Safety and Trading Standards functions due to the large number of applications received. During 2023/24 889 food business registration inspections were planned following receipt of applications, 519 in Cardiff, 189 in Bridgend and a further 181 in the Vale of Glamorgan all of which are required to be inspected alongside the planned programme of inspections. This is further exacerbated if businesses have poor compliance on initial inspection, requiring the need for further intervention.

Food Hygiene Rating Scheme Appeals and Re-ratings – The Food Hygiene Rating Scheme (FHRS) for Wales was introduced in 2013 with the purpose of allowing consumers to make informed decisions about the places they eat or shop for food, and through these decisions encourage businesses to improve their hygiene standards. SRS officers inspect the hygiene standards found in food businesses providing a Food Hygiene Rating from 0-5 together with a sticker that must be displayed in a conspicuous place where it can be easily read by consumers before they enter the establishment. Under the Scheme, food businesses have the right to appeal against their food hygiene rating if they consider it unjust, and also request a re-rating inspection if improvements have been made following the inspection. Appeal inspections and re-rating inspections represent a significant amount of work for SRS as they sit outside the food hygiene programme of inspections and officers are required to undertake these inspections within defined timescales. A recent report by the Food Standards Agency indicated that during the period 28 November 22 to 27 November 2023, 75 appeal applications were received across Wales. Given the sheer number of food businesses in the SRS region, it is perhaps not surprising that the Service received 22 of these appeal applications representing 29% of all those received across Wales. Furthermore, in terms of re-rating applications, SRS received 54 applications during the same period.

From 1st of October 2024 the fee for a food hygiene re-rating will increase from £180 to £255 as agreed by the all Wales Food Expert Panel.

Increase in food businesses operating online - The increasing use of social media platforms such as Facebook and Instagram has resulted in some businesses seeking to utilise these platforms as a means to market and sell food but without first registering their food business with the local authority. In doing so, these businesses are not inspected to assess their ability to supply safe food to consumers.

Changes to the Food Regulation Landscape - Through the Achieving Business Compliance (ABC) programme the Food Standards Agency are looking to modernise the way food businesses are regulated in England, Wales and Northern Ireland. Within the programme there are three key workstreams;

1. Modernising the delivery of food regulation-through which the risk rating and interventions completed by local authorities are looking to be changed to enable resources to be targeted at areas posing the highest risk to food safety.
2. Testing new approaches to Regulation-Projects within this workstream include Enterprise Level Regulatory Approaches which will test new regulatory models for some large businesses that are compliant with regulation by the business being regulated as a whole,

rather than as multiple small premises.

3. Designing the blueprint for the future regulatory assurance system-to identify where different approaches could be tested or opportunities for future legislative changes made.

It is important that the Service continues to engage with the Food Standards Agency on any proposals to ensure the views and experience of the service are reflected.

Brexit Developments – There are significant implications for SRS as a result of the Retained EU Law (Revocation and Reform) Bill which provides ministers with powers to amend, retain or revoke any pieces of retained EU law (REUL), of which there are thousands. Originally, a sunset clause meant that any piece of REUL would be revoked at the end of December 2023 if ministers hadn't actively saved it by that point, however a recent announcement from UK Government has overturned this position. There will now be no fixed 'sunset clause' deadline and instead it would appear that officials will continue to work through each piece of legislation in turn until this task is complete. While this announcement is welcome, the issue continues to be a cause for concern for regulatory services, particularly in legislative areas such as food safety, health and safety and product safety which rely heavily on EU law. The service will continue to lobby alongside environmental health and trading standards professional bodies to raise awareness of the associated risks stemming from the Bill, in terms of business certainty, compliance and enforcement.

Cost of living crisis – The cost of living crisis continues in the UK and across the world. We have seen food and energy prices rise markedly together with price increases of consumer goods and services. The financial pressures this puts on both businesses and individuals impacts many of the services delivered by SRS. Businesses may seek to cut corners resulting in a drop in standards, while consumers may be tempted to purchase cheaper alternatives which could negatively impact the health and safety of our communities. Food businesses, for example, already struggling following the pandemic, faced with rising prices may be tempted to substitute food items for cheaper alternatives and cut corners in their food hygiene processes to save money. We are finding that many businesses are having to reconsider their trading patterns and operations with a view to cutting costs and attracting more trade. Fewer staff employed at the businesses means less ability to keep on top of cleaning and compliance procedures to meet food safety standards and we are seeing an increase in pests at food premises which has resulted in a rise in enforcement action taken. This inevitably places greater demands on SRS at a time when the service itself is facing budgetary pressures.

Increase in food banks – The cost of living crisis has seen a significant increase in the number of food banks available to support people who struggle to afford to buy enough food to eat. These food banks are usually operated by volunteers relying heavily on donations from supermarkets, schools, churches and businesses. Like any food business, these food banks are regulated and inspected to ensure compliance with food safety requirements. Often the food donations come from supermarkets where food supplied is close to expiry of the use by date which gives food banks only a limited time to distribute the food. Food with best before date can be legally sold, redistributed, and consumed after the date if judged to be of sufficient quality to be donated and made available to be eaten. There has been recent incidences of food past its use by date being supplied by a food bank and this emerging issue suggests that greater engagement with these charitable organisations may be needed.

Allergens – Food Allergies have a major impact on many consumers within the community. Further recent high profile cases within the media has increased awareness of these issues and as such the trading standards service has increased its market surveillance exercises to ascertain compliance levels in an attempt to protect public health. The continued non-compliance found by officers within the service demonstrates that compliance with the associated legislation remains a challenge for the service. Further survey work is planned for this financial year to target this area of work.

Major events - SRS plays an important role in the successful staging of major events across the three local authority areas. In addition to dealing with any licensing matters associated with a particular event, SRS plays an essential role in ensuring that food sold at these events is safely prepared and stored, and that it is labelled correctly. In the case of stadium concerts and sporting events, input may be required to assist brand holders to protect trademarked goods and safeguard against the supply of counterfeits. Major events staged through the participant Councils go through a detailed planning process via the respective Events Safety Advisory Group in Bridgend and the Vale of Glamorgan, and in Cardiff via the Events Liaison Panel. SRS plays a role throughout the planning stages with respect to food safety, health and safety and brand protection. While summer is traditionally the busiest time for events, we are seeing a pattern of exceptionally busy periods where events are being held back to back putting a great deal of pressure on SRS officers. This is due in part to the success of the City of Cardiff Council in promoting itself on the world stage as the home of successful events. This has an impact on the service in terms of meeting demand from other areas of responsibility, at a time of diminishing staff resource, and in covering weekend and evening work.

Review of ICT and mobile working solutions – Since the inception of SRS, officers have been provided with access to the systems of the 3 legacy authorities of Bridgend, Cardiff and the Vale of Glamorgan. This enables officers to access the essential IT systems they need to fulfil their duties for the relevant authorities. While this has worked well, more recent updates to systems and software have impacted on the continuity of current arrangements affecting connectivity and access. SRS maintains good relationships with the ICT departments of the legacy authorities to deal with issues as they arise in the short term, however it has become evident that there is a need to consolidate the long term access requirements of SRS to ensure continued access and smooth running of systems in order to provide seamless delivery of essential services.

An essential component of the operating model for SRS was the introduction of technical and mobile working solutions that enable employees to work remotely. This has contributed to the success of the service, but as agile working becomes the norm for many within the service, we are finding that the technology deployed is becoming outdated. It is clear that as technology improves, better facilities now exist which could further enhance the work of SRS and its remote working capabilities as we move forward. SRS will continue working with staff and ICT to explore options for improving equipment with a view to introducing tablet devices for officers to conduct inspections to ensure that we deliver services to our customers both efficiently and effectively.

Seasonal demand – Porthcawl is home to the largest caravan park in Europe which attracts a large influx of tourists during the summer months. This results in a number of food premises which operate on a seasonal basis, both at the caravan site, the funfair and within the town. Inspections and other enforcement activity at these premises take place during the restricted trading period. Likewise Barry Island as a sea side attraction equally attracts a number of tourists during the summer months. This results in a number of food premises operating on a seasonal basis with food business operators changing on a frequent basis.

2.5 Enforcement Policy

Fair and effective enforcement is essential to protect the economic, environmental and social interests of the public and business. Decisions about enforcement action and in particular the decision to prosecute, has serious implications for all involved and for this reason, the Shared Regulatory Service has adopted a Compliance and Enforcement Policy.

The Compliance and Enforcement Policy sets out the standards that will be applied by the Service when dealing with issues of non-compliance, and what residents, consumers and businesses can expect. Such a policy helps to promote efficient and effective approaches to regulatory inspection and enforcement, and balances the need for improvement in regulatory outcomes with minimising unnecessary burdens on business.

Traditionally based upon the principles of the Enforcement Concordat and the Regulators Compliance Code, local authority Enforcement Policies must now reflect the Regulators Code of 2014 and the regulatory principles required under the Legislative and Regulatory Reform Act 2006

The Regulators Code is based upon six broad principles:

- Regulators should carry out their activities in a way that supports those they regulate to comply and grow;
- Regulators should provide straightforward ways to engage with those they regulate and hear their views;
- Regulators should base their regulatory activities on risk;
- Regulators should share information about compliance and risk;
- Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply;
- Regulators should ensure that their approach to their regulatory activities is transparent.

3. Service Delivery

3.1 Interventions at Food and Feeding Stuff Establishments

It is the policy of the Shared Regulatory Service to ensure that food and feed businesses within its jurisdiction receive interventions e.g. inspections in accordance with the Food Law and Feed Law Codes of Practice and Practice Guidance. This requires local authorities to have a programme of interventions which is adequately resourced and provides sufficient information to show that businesses are complying with food law.

3.1.1 Food Hygiene Interventions

The typical planned programme for food hygiene interventions is based on the requirements of the Code of Practice and Practice Guidance. Following inspection all food businesses are risk rated from A (highest risk) to E (lowest risk). A suitable intervention is required in accordance with that risk rating.

Official controls are required at prescribed frequencies for risk categories A-D Category A businesses require an inspection twice a year, category B once a year and category C, at 18 month intervals. Category D interventions, however, can alternate between an official control, e.g. a full inspection, and a visit by a non Environmental Health Officer.

Low risk food premises (Category E) need not be subject to an official control, however they must be subject to an alternative enforcement strategy not less than once in any 3 year period, this could include a postal questionnaire.

When a full inspection is completed as an intervention on an establishment, a risk assessment will be made based on the Officer's findings. This will result in some movement of food businesses between the different risk categories. Food Establishments with improved performance will move to a lower risk category and under-performing businesses will move to high risk categories and receive more frequent interventions.

All new food businesses should receive an inspection within 28 days of registration or from when the authority becomes aware that the establishment is in operation. The requirement to undertake initial inspections within 28 days may in some circumstances present a conflict for resources to complete other higher priority activities. In such circumstances prioritisation of interventions within the authority's programme should be undertaken in a risk based manner.

While the Code of Practice allows some lower rated businesses to be subject to interventions other than a full inspection, the introduction of the Food Hygiene Rating Act means that in order to be given a hygiene rating, food businesses within scope of the Act need to have received a full inspection.

Proposed food hygiene interventions 2024/25

A Rated Food Businesses

100% of **A rated** food businesses will be subject to a full inspection.

B rated businesses

All establishments rated **Category B** due an inspection will receive an onsite inspection.

C rated businesses

All establishments rated **Category C** due an inspection will receive an onsite inspection.

D rated food businesses

D rated food establishments can alternate between a full inspection and a non official control e.g. an information gathering visit using a questionnaire. No new risk rating or food hygiene rating score is permitted from a non official control. If at the time of the information gathering visit there is concern that the level of food safety has deteriorated, or the food operation has changed, then the intervention will be referred to a competent officer for a full inspection.

During 2024/25 all establishments rated **Category D** due an intervention will receive the appropriate intervention.

E rated food businesses

E rated food businesses may be subject to an alternative enforcement strategy only, i.e. a postal questionnaire. (No new risk rating or food hygiene rating score is permitted from this type of intervention). The information received will allow assessment of the current level of compliance with food hygiene legislation and highlight any changes to the business. Where changes in management, activities or serious deficiencies are identified an inspection will be undertaken.

During 2024/25 all establishments rated **Category E** due an intervention will receive the appropriate intervention.

Inspection of New Businesses

Unrated food establishments will be subject to a full inspection. This should be undertaken within 28 days of their opening.

Food Hygiene Revisits

Inspection of food businesses often requires follow up visits to ensure compliance with food safety requirements. The intervention and revisit procedure requires that all businesses rated 0 are revisited within 28 days and all those rated 1 or 2 are revisited within 3 months. Officers are also requested to revisit to ensure that any food safety issues of concern are fully addressed.

Appeals

Food businesses have a right under Section 5 of the Food Hygiene Rating (Wales) Act 2013 to appeal the food hygiene rating given to the establishment if, they do not agree that the rating properly reflects the hygiene standards found at the business at the time of the inspection or that they believe that the rating criteria was not applied correctly when producing the rating. Businesses have 21 days from the date of receipt of the notification letter to lodge an appeal and similarly the outcome of the appeal will be communicated to the business within 21 days from the date the appeal was received.

FHRS Re-scores

In addition to appeals, food business operators also have a right to request a rescore inspection for the purpose of re-rating under the Food Hygiene Rating Scheme. This request can be made anytime after the statutory inspection, provided that businesses have made the required improvements. In these circumstances, SRS are permitted to recover costs for such an inspection and charge a fee accordingly. The re-visit must be undertaken within 3 months.

Inland Imported foods

During the inspection of food businesses, officers consider the origin of imported foods. Any indications that food may not have been subject to correct import controls are investigated and, where necessary, the food is removed from the food chain.

Port Health Functions

As a Port Health Authority, Shared Regulatory Services is responsible for the enforcement of food law and promotion of food safety issues on board all ships and aircraft arriving in Cardiff and the Vale. This includes responsibility for monitoring the safety of imported food and feed at the point of import, the control of infectious disease, undertaking ship inspections, enforcing food safety and hygiene standards and general public health within the Port.

Currently neither the seaports of Barry or Cardiff, nor Cardiff International Airport are designated Border Control Posts. This means that only food products other than those of animal origin, feed or high risk foods not of animal origin are permitted to be imported into these ports. Currently there is no feed or food routinely imported through the ports but the service continues to monitor shipping and aircraft movements to ensure compliance with the relevant law.

The Port Health Service Plan outlines in detail the work undertaken in relation to the Authority's Port Health functions including food safety.

Programmed Interventions for 2024/25

The table below illustrates the risk ratings of premises, the intervention frequencies and the total number of interventions to be delivered during 2024/25.

Food Safety Intervention Plan 2024/25

Risk Category	Intervention frequency	Number of Interventions due at start of year (Including any backlog)			
		Bridgend	Cardiff	Vale of Glamorgan	
HIGH RISK	A	6 mths	3	14	3
	B	12 mths	49	160	63
	C	18 mths	357	836	333
	High Risk Total		409	1010	399
MEDIUM-LOW RISK	D	2 years	50	186	53
	E/AES *	3 years	200	356	178
	Medium to low risk Total		250	542	231
NEW BUSINESSES	Unrated (New business identified o/s from 23/24)		31	88	35
	Unrated (New business identified during course of year)		Est 190	Est 528	Est 180
	Unrated total (Estimate based on 2023/24 no. identified)		221	616	215
REVISIT	Revisits (Estimate based on 2023/24 actual undertaken)		68	311	67
TOTALS			948	2479	932

Food Safety Projects

Shopping Basket Survey - The Welsh Food Microbiological Forum annually provide a list of food products to be sampled that have an emerging or identified risk. Participation by the local authorities in this survey helps to identify non-compliant foods for intelligence data gathering and action to be taken against securing food safety. Approximately 150 samples are hoped to be obtained for further action to be considered as appropriate.

Communication with food businesses – Food business newsletter to be produced and sent by email to all food businesses across SRS with information on food hygiene, food standards and health and safety.

Farmers Markets – Visits to farmers markets operating throughout Cardiff will be undertaken to carry out checks on food stalls and ensure their compliance with food hygiene requirements.

3.1.2 Food Standards Interventions

Food Standards is a legislatively complex area covering meat speciation, composition, labelling, claims, allergens, chemical contamination (such as heavy metals and carcinogens such as mycotoxins), compositional standards (such as meat content), additives, food fraud and genetically modified ingredients and foods. It also covers articles that come into contact with food and ensuring that there is no transfer of chemicals including carcinogens.

Primary producers are the initial growers and manufacturers of all food commodities such as meat, grains, eggs, honey etc. and the most common primary producers are farms. As with food and feed businesses, primary producers have to register with the authority and are subject to the same controls as more regular food and feed businesses.

The Service uses the food code of practice as a risk assessment model and the Food Safety Act.

Food standards premises are divided into three categories namely high, medium and low. The Food Standards Code of Practice indicates that high risk premises are inspected every 12 months, medium risk premises are inspected every 24 months and low risk premises could be subject to an alternative enforcement strategy at least once during any 5 year period. Some establishments which undertake food activities do not meet the definition of a food business establishment and therefore fall outside of the scope of Regulation (EC) No 852/2004. These premises do not carry a food standards risk rating however they do remain subject to the provisions of the Food Safety Act 1990 and Regulation (EC) No 178/2002.

High risk businesses

100% of high risk food businesses will be subject to a full inspection in relation to food standards.

Medium to low risk businesses

Medium to low risk businesses will receive an intervention at the time of the programmed food hygiene inspection when carried out by a competent officer, and if intelligence received suggests risks have increased.

New business

Unrated food establishments will be subject to a full inspection. This should be undertaken within 28 days of their opening.

Unverified businesses

Unverified businesses are those businesses recorded on the SRS database that have yet to be rated. Unlike new businesses which are also unrated, these are business records that when transferred from our former database to the new Tascomi database contained errors. Significant work has been carried out to remedy this situation since they were first identified, however there still remains a large number of businesses that require a rating. This work will progress during the year via a range of approaches including desktop exercises, alternative enforcement strategies and inspection. Please note unverified businesses are only applicable to food standards.

Revisits

Food visits that fail to comply with significant statutory requirements should be subject to appropriate enforcement action and a revisit to assess compliance. Failure to comply with significant statutory requirements may include failure to comply with:

- A single requirement that comprises food standards or prejudices consumers
- A number of requirements that, taken together, indicate ineffective management.

Each situation should be judged according to the circumstances and the authorised food officer should make a professional decision as to whether a revisit is appropriate. The timing of the revisit should be appropriate depending on the matters which require attention. The authorised food officer should make a professional judgement and discuss the timescales with the proprietor. Revisits should be undertaken by the officer who conducted the original intervention and the results of the revisit should be recorded in the relevant premises file and computer database. If the revisit reveals that the proprietor has failed to comply with any legal requirement then the appropriate enforcement action should follow.

Generally revisits are undertaken where there are significant breaches of the legislation. Where an officer intends to take action or make recommendations that may affect the policies or procedures of a business with outlets outside the SRS boundary they should consult the relevant Home Authority.

Food Standards Intervention Plan 2024/25				
Risk Category	Intervention Frequency	Number of Interventions due at start of year (including any backlog)		
		Bridgend	Cardiff	Vale of Glamorgan
High Risk	12 mths	6	12	3
Medium Risk	24 mths	0	0	0
Low risk	60 mths	0	0	0
New business	New business identified at 1 April o/s from 23/24)	64	350	123
	Estimate based on new business identified during 23/24	Est 206	Est 655	Est 224
	Total (Estimate based on 22/23 no. identified)	276	1017	350
Unverified businesses	This relates to errors within the database on set up	10	58	2
Re-visits	Estimate based on 23/24 undertaken	2	5	1
Total		288	1080	353

3.1.3 Feed Hygiene Interventions

The BSE health scare during the last two decades revealed the fundamental link between the feed we give to animals and our own health. Consequently feed safety is now considered a fundamental part of food safety and is enforced by the Service.

The controls are similar to those relating to food. A register is maintained of feed businesses, and inspections are completed according to their risk rating in agreement with the FSA and any earned recognition. Checks are made during inspections to ensure that feed is stored hygienically and that feed placed on to the market and fed to food-producing animals is safe and labelled correctly to allow for product traceability and recall in the event of a feed incident. The ring fenced funding administered by the FSA has allowed SRS to review and refine the information held on the register which in turn has enabled the better identification and targeting of feed premises for interventions.

Animal Feed premises are risk rated following the Feed Law Code of Practice risk assessment framework, which provides appropriate risk assessment criteria for officers to assess premises against. This is used to identify high risk premises, and to plan the animal feed inspection programme in line with our agreed programme which is funded by the FSA. The assessment of feed businesses is undertaken on each inspection and the assessment is updated by the officer following the inspection.

The risk assessment for feed premises is undertaken against the following factors:

Risk to Animal/Human Health and/or Other Businesses

This factor considers the potential adverse effect on animals/human health, and the consequences for other businesses, should the establishment not comply with feed legislation.

Extent to Which the Activities of the Business Affect any Hazard

This factor considers the type of activities that the feed business undertakes, the need for any of those activities to be closely monitored and controlled, and the feed business operator's potential effectiveness in maintaining compliance with animal feed law

Ease of Compliance

This factor considers the volume and complexity of animal feed law that applies to the business and with which it has a responsibility to ensure compliance.

Animals and People at Risk

This factor considers the number of animals/people likely to be at risk if the business fails to comply with animal feed legislation.

Level of (Current) Compliance

This factor considers the level of compliance with animal feed law observed during the inspection. Adherence to relevant UK or EU Industry Guides to Good Practice and standards produced by assurance schemes should be considered.

The above factors are allocated a range of scores depending on the level of compliance, with higher scores awarded where high risks are considered. The Code of Practice sets out the inspection frequency requirements depending on the risk score as follows:

Feed Premises Inspection Frequencies as set out by the Feed Law Code of Practice

Risk Category	Points Range	Minimum Inspection Frequency
A	147-200	At least every 12 months (1yr)
B	122-146	At least every 24 months (2yrs)
C	106-121	At least every 36 months (3 yrs)
D	85-105	At least every 48 months (4 yrs)
E	0-84	At least every 60 months (5yrs)

Under the Code of Practice, the inspection of higher risk businesses takes preference over the inspection of lower risk. However, implementing an inspection programme which includes only establishments that are rated as high risk is also not acceptable.

All feed business operators registered or approved for high risk feed activities such as manufacturers, surplus food suppliers, co-product producers and distributors are required by the Feed Law Code of Practice (Wales) to have interventions undertaken by a qualified, competent and authorised officer. Low risk premises such as livestock farms which may or may not mix with additives, arable farms, official controls at primary production and at points of entry can have interventions undertaken by a competent authorised officer.

High risk business

In line with the risk assessment process high risk premises require an annual inspection, owing to the potential risks to the feed chain. On the whole the manufacturing of animal feed, feed additives, anti-toxicants, proteins or compound feeds have higher risk factors in the risk assessment. Within SRS there are very few of these type of premises in operation. Currently the number of Category A – High risk banded premises is very low with only one premises registered.

Medium to low risk business

In terms of medium risk categories (B-C), there are limited number of premises, within SRS, and the majority of these are suppliers of surplus food which is placed into the feed chain. Examples of these are brewers with surplus grains and supermarkets with surplus breads etc.

The majority of the feed premises within SRS fall within the Cat E risk category, of low. This is owing to the fact that the majority of the feed premises are livestock farms, where many farms buy in feed to provide their animal's feed during the winter months when grazing is restricted.

Feed Safety Re-visits

Re-visits are undertaken in order to ensure compliance as a result of an identified non conformity during an initial inspection or as a result of a complaint. It is therefore not possible to plan the number of re-visits that will be undertaken during the year. All revisits are recorded on our quarterly return which is provided to the FSA.

New Businesses

In line with the Feed Law Code of Practice, SRS must make use of information supplied by feed business operators in connection with the registration or application for approval of their feed business establishments in accordance with Article 31 of Regulation (EC) No 882/2004, in order to determine when to carry out an initial inspection, there is no set target requirement. However SRS

will ensure that all new feed businesses and those subject to Annex II of Regulation (EC) 183/2005 will as a minimum receive a full inspection within 3 months of opening. Similarly new businesses carrying out primary production only will be subject to a full inspection within 3 month of opening.

The numbers of new feed businesses which open each year are very small. The majority of feed businesses falling within the remit of Shared Regulatory Services are well established with little turnover of business ownership.

Feed Safety Intervention Plan 2024/25				
Type	No. of inspections due			
Inland Feed inspections	Bridgend	Cardiff	Vale of Glam	Total
Manufacturer (A01-08 and R01-04)	-	-	-	-
Co Product Producer (R12)	-	1	-	1
Mobile mixer (R04)	-	-	-	-
Importers	-	-	-	-
Stores (R09)	-	-	-	-
Distributor (A01-08, R01-03, & R05)	-	-	1	1
Transporter (R08)	-	-	-	-
On farm mixer (R10 Annex II)	-	-	-	-
On farm mixer (R11)	-	-	2	2
Pet food manufacturer (R06)	-	-	1	1
Supplier of feed materials/surplus food (R07)	-	16	11	27
Total inland feed inspections	-	17	15	32
Feed Hygiene at Primary Production inspections				
Livestock farms (R13)	35	14	59	74
Arable Farms (R14)	-	-	-	-
Total Feed Hygiene at Primary Production inspections	35	14	59	108
Miscellaneous				
Poultry slaughterhouse (435)	-	-	-	-
Unknown	-	-	-	-
No code assigned	-	-	-	-
Total miscellaneous	-	-	-	-
Total feed premises/inspections	35	31	74	140

3.2 Food and Feed Complaints

There are occasions where unsafe practices or potential risks come to light as a result of a complaint or concern raised by a member of the public or employee and these are treated as complaints. Complaints received vary from foreign bodies, to mould, to compositional standards or to the perception that the food or feed is spoiled. Following a complaint an Officer will carry out an investigation to verify the existence of the problem and where necessary seek to minimise the risk.

This will often require the procurement of a sample, which would not form part of the sampling programme.

Support from the Public Analyst and Public Health Wales Laboratory is needed to complete investigations which place a financial implication on service provision.

Based on the number of complaints received during 2023/24 it is estimated that for the period 2024/25 the following numbers of complaints could be received.

Complaint type	Bridgend	Cardiff	Vale of Glamorgan
Food Hygiene	85	302	106
Food Complaints	14	81	17
Food Standards	31	106	32
Feed Safety	0	0	0

3.3 Home Authority Principle and Primary Authority Scheme

The Home Authority Principle applies to businesses with outlets in a number of local authority areas. The aim of the scheme is to improve consistency in the way local authorities enforce food safety in a company throughout the country. A Home authority is an authority that acts as a focal point for liaison in food issues between a company and other local authorities that have outlets in their local authority area. Shared Regulatory Services assists local authorities and the FSA with their investigations whenever the need arises under the Home Authority Principle.

The Primary Authority Scheme builds on the foundations created by the Home Authority Partnership Scheme but entails a shift in the nature of the relationship between business and regulators bringing benefits to both parties. It offers local authorities the opportunity to develop a constructive partnership with a business that can deliver tailored Primary Authority advice along with co-ordinated and consistent enforcement for the business and provides new funding arrangements, whilst allowing local authorities to recover costs from partner businesses. The Primary Authority Scheme is especially beneficial to businesses with outlets in a number of local authority areas. The partnership is a legally recognised partnership that provides advice, ensures consistency of regulation between local authorities and reduces duplication of inspections and paperwork. The Office for Product Safety and Standards promotes the Primary Authority scheme in Wales.

Since October 2017, amendments to the Regulatory Enforcement and Sanctions Act brought some significant changes to the Primary Authority scheme which has broadened the scope for SRS to enter into PA partnerships. As a result of this, some existing Primary Authority Partnerships in England now require additional support for Welsh Devolved matters so that businesses trading in Wales in sectors such as food, public health, agriculture, environmental protection, pollution control, and housing need to have a Welsh Primary Authority partner to issue advice in Wales. SRS is currently supporting 11 of our 35 partnerships in this capacity on food hygiene and food standards matters to ensure continued Primary Authority coverage in Wales which includes some 'big names' in the retail and other sectors with a number of other prospective Welsh partnerships in the discussion phase.

Primary Authority advice that has been issued must be considered by local authorities during their interaction with that business. The Primary Authority can block enforcement if the enforcing authority has not considered the relevant Primary Authority advice or disagrees with their interpretation.

Conversely, where the Service deals with a business that has a primary authority agreement in place with another Authority, the following guidelines will apply: -

- Where Shared Regulatory Services acting as an enforcing authority has concerns about the compliance of a business that has a primary authority, it will discuss the issue with the primary authority at an early stage.
- If enforcement is envisaged Shared Regulatory Services will notify the primary authority of the proposed enforcement action through the Primary Authority Register.
- Shared Regulatory Services will follow published inspection plans and will only deviate if required to issue a food hygiene rating or events during a visit require this.

3.4 Advice to business

Shared Regulatory Services aims to assist businesses wherever possible by providing food and feed safety advice through a variety of channels, such as:-

- Advice provided as part of the inspection process;
- Responding to complaints and requests for service;
- Twice yearly food newsletter;
- Provision of information leaflets;
- The provision of chargeable training;
- Promotion and participation in national events, such as Food Safety Week;
- Participation in working groups, such as Events Liaison Panel;
- Advice through Shared Regulatory Services website;
- Regular Food Business Forums;
- Practical targeted training at business premises;
- Paid for food hygiene advice visits available to all applicable food businesses;
- Food Standards advice provided on inspection and provision of labelling reviews on a chargeable basis.

3.5 Food and Feed Sampling

Sampling is important in helping protect public health and safety by testing food and feed to ensure they meet composition, labelling, chemical and microbiological safety standards in accordance with current Codes of Practice and guidance. Proactive sampling is undertaken in the following situations:-

- National, regional and locally co-ordinated surveys/programmes;
- Local food and feed producers;
- Home and originating authority samples;
- Complaints;
- Process monitoring and verification;
- Special investigations;

- Imported foods and feed;
- Inspections;
- Durability;
- Surveillance/screening;
- Water quality monitoring aboard ships, approved premises and food businesses served by private water supply.;
- Foods procured by the authority will be checked for compliance not only with legal standards but the specifications of the contract. This will include meat specification.

Each year Shared Regulatory Services receives a budget allocation for microbiological analysis of samples from Public Health Wales.

Food Hygiene Sampling

Sampling to secure the safety of food involves testing of food and water for microbiological, chemical, physical and/or radiological parameters (refer to attached plan contained in Appendix A).

The policy is largely determined by the Service's participation in proactive schemes co-ordinated through agencies such as the Food Standards Agency (FSA), Public Health Wales, Local Government Regulation (previously LACORS), Welsh Food Microbiological Forum (WFMF) and Public Health England. End product testing at approved establishments and high risk premises also constitutes an important element of the proactive work undertaken by the Service. Reactive sampling arrangements cover food importation, food poisoning outbreaks and the investigation of water and food complaints.

Food Standards Sampling

Priorities for food sampling are primarily identified after giving consideration to the risk to consumers in terms of safety or economic loss, data from the previous years sampling programme indicating areas of concern, emerging risks and priorities identified by local and National intelligence.

An area of growing concern surrounds the declaration and the cross contamination of allergenic ingredients in takeaway dishes. There have been a number of well publicised cases in the media that have highlighted the dangers of eating unsafe food sometimes with fatal consequences. During recent years priority has been given to sampling products from takeaway premises to establish the presence of undeclared allergens and this work will continue alongside an educational programme aimed at smaller retail premises to increase compliance.

SRS will continue to support operation OPSON a global initiative jointly coordinated by Europol-INTERPOL focusing on counterfeit and substandard food, and the organized crime networks behind this illicit trade. In the UK activities are co-ordinated by the National Food Crime Unit (NFCU) and the Food Standards Agency (FSA).

Details of the planned sampling programme for Food Standards can be found at Appendix B.

Feed Hygiene Sampling

Contaminated or unfit feed given to animals can adversely affect animal health and the health of consumers of animal products (milk, meat and eggs). While the frequency of major feed incidents is low, the impact in terms of public health risk, cost and reputational damage can be high.

When incorporated into a programme of official feed controls, risk based sampling will ensure that a robust, targeted and proportionate level of enforcement takes place. The sampling programme is designed to detect/prevent potential threats to feed safety for food producing animals, based on officers' local knowledge as well as the national enforcement priorities set by the FSA .

Feed sampling during 2024-25 will follow the National Enforcement Priorities for Feed which are contained in Appendix C of this Plan.

3.6 Control and investigation of outbreaks and food related infectious disease

All cases of communicable disease are investigated and full details of this work are outlined in the Communicable Disease and Health Protection Plan 2024/25. This includes the investigation of notified confirmed and suspected cases and outbreaks of food poisoning and food borne disease. These investigations are supported by reactive inspections of food businesses, food, water and environmental sampling of implicated premises and proactive delivery of bespoke training.

The investigation of cases and outbreaks of food poisoning routinely includes:-

- The receipt and verification of laboratory confirmed isolates from Public Health Wales Microbiological Laboratories (via Tarian) and unconfirmed reports of food poisoning from Medical Practitioners, members of the public, cases, employers, other local authorities and rarely masters of vessels visiting the port and their agents;
- Telephone and less frequently face to face interviews with cases, close contacts and the provision of infection control advice;
- Managing exclusions of cases and contacts from the workplace, schools and health care settings;
- Liaison with GP surgeries, hospitals, Public Health Wales and other stakeholders during the investigation for the purposes of identifying the source of infection and preventing onward transmission;
- Undertaking site visits and applying control and preventive interventions;
- Managing the collection and submission of faecal samples;
- The collection, analysis and reporting of data relating to food poisoning;
- The investigation, management and control of outbreaks of communicable disease where food or water is, or is thought to be, the vehicle of infection.
- Taking the lead on, and contributing to, local and national communicable disease initiatives and surveillance programmes, examples have included the Campylobacter Good Practice Statement, Hepatitis E and E. coli O157 national surveillance programmes.

For all sporadic cases and small, or medium size outbreaks (up to 50 cases), the staffing resources provided by the Communicable Disease, Health and Safety Team are sufficient, however for larger outbreaks, other staff within the Service would be available for interviewing cases and collection of specimens. For certain outbreaks comprising a significantly greater number of cases, or cases of greater severity or longevity, Environmental Health staff based in other teams would be trained and used in the data gathering and investigation process.

Campylobacter is the most common cause of food poisoning in the UK and many developed countries around the world.. The incidence of Campylobacter infection throughout SRS far exceeds other notifiable diseases (with the exception of COVID-19), which reflects the national trend observed across the UK. Campylobacter species are the most common bacterial cause of infectious gastrointestinal disease in developed countries due to its small infectious dose (<500 organisms can cause disease) and the range of environments where the pathogen can survive and thrive.

Common risk factors associated with confirmed cases of Campylobacter include: foreign travel; consumption of undercooked poultry and poultry offal (i.e. 'pink' chicken livers); consumption of unpasteurised dairy products; consumption of contaminated drinking or leisure water; direct contact with animals/birds and their faeces; close contact with the faeces of an infected person (i.e. changing nappies of an infected child) and subsequent poor hand hygiene; cross-contamination associated with the growing popularity of feeding pets a raw meat diet; the accidental consumption of raw/part-cooked chicken products and the practice of washing raw chicken packaging for recycling (where the bacteria becomes splashed onto adjacent surfaces and subsequently transferred onto hands, ready-to-eat foods or other equipment).

Campylobacter remains an important public health risk. The pathogen has multiple risk factors in addition to having a low infective dose, meaning that a person only needs to be exposed to a small amount of the bacteria to become ill. It is therefore critical that the communicable disease service retains the requisite level of resource to be able to effectively investigate all confirmed cases in a timely manner.

All cases notified to the Service are contacted and interviewed primarily by phone and occasionally by face to face interview. Interview questions relate to exposures within the 10 days prior to the onset of illness and include clinical and demographic information, food history and environmental exposures, foreign and domestic travel, and with regard to chicken domestic food preparation and purchasing practices and commercial dining locations. A full report on the risk factors associated with Campylobacter Infection in Bridgend, Cardiff and the Vale of Glamorgan in 2023 can be found in the Communicable Disease and Health Protection Service Plan 2024/25.

Other commonly reported cases of food poisoning include Salmonella, Cryptosporidium, Giardia, E.coli O157, Hepatitis E and Listeria. Investigations of these pathogens vary in complexity and control and preventive measures involve a diverse application of interventions for example identifying high risk activities such as food handlers, health care workers, child care workers, environmental sampling and sampling of close contacts and applying control measures such as exclusion from work, restricting employment and leisure activities, closure of business activities and training. Timely investigation is thus critical to the control and containment of these infections.

Outbreaks - In addition to the ongoing investigation of sporadic cases of food poisoning the service also identify and investigate outbreaks. An outbreak is defined as illness affecting two or more people who share a common exposure factor linked by time, place or person. Typically outbreaks are commonly caused by suspected Norovirus and the most common mode of transmission associated with these is either person to person or environmental contamination rather than foodborne transmission. Considerable work is undertaken to support educational and care home settings, particularly during the winter months to minimise the disruption caused by these viral infections. Norovirus infections are difficult to prevent in semi enclosed settings but their longevity and level of disruption can be greatly reduced with early intervention and application of effective public health measures.

Based on previous year's demand, it is estimated that the team will undertake the following investigations during 2024.

Communicable Disease Intervention Plan 2023			
Type	Number of Interventions estimated at start of year based on those received in the previous year (2023)		
	Bridgend	Cardiff	Vale of Glamorgan
Total No. of confirmed food poisoning notifications	85	165	64
No. of food related outbreaks	0	0	0
Total	85	165	64

3.7 Feed/Food Safety Incidents

The Service will on receipt of any food alert respond in accordance with the Food Safety Act Food Law Code of Practice and Practice Guidance .

A Product Withdrawal Information Notice or a Product Recall Information Notice is issued where a solution to the problem has been put in place – the product has been, or is being, withdrawn from sale or recalled from consumers, for example. A Food Alert for Action is issued where intervention by enforcement authorities is required.

Alerts requiring substantial reactive action will occur occasionally and irregularly. Sufficient resources will be allocated to deal with each warning as it arises, although this may require diversion from the planned programme of inspection.

If the Service becomes aware of a feed hazard we will take action to protect public and animal health at the earliest opportunity and in any event by the next working day. An assessment will be carried out to determine the likely scale, extent and severity of the risk, involving other agencies as appropriate. Enforcement options include, if necessary, detaining or seizing the feed concerned. The Service will on receipt of any feed alert respond in accordance with the Feed Law Code of Practice and the Food Standards Agency.

Dealing with feed safety incidents includes the effective response to Feed Alerts issued by the FSA and ensuring that any action specified by the FSA is undertaken promptly and with sufficient resources.

3.8 Liaison with other organisations

Liaison is an appropriate mechanism for ensuring consistency between enforcers, for sharing good practice, for sharing information and for informing other enforcers of potential difficult situations.

The main liaison arrangements in place and regularly used are as follows:-

- Food Standards Agency
- Directors of Public Protection Wales Food Safety Expert Panel; Communicable Disease Expert Panel; Wales Heads of Trading Standards Food Panel; Food and Agriculture Panel
- Directors of Public Protection Wales Regional Liaison Group, the Glamorgan Group Food Panel, the all Wales Feed Group; Food and Agriculture Group; South West Wales and South East Wales Food Safety Task Groups, South West Wales Communicable Disease Task Group, Welsh Food Microbiological Forum, Wales Food Hygiene Rating Scheme Implementation Group.
- Liaison with professional bodies such as the Chartered Institute of Environmental Health, the Royal Society of Health, the Royal Institute of Public Health and Hygiene, the Chartered Institute of Trading Standards; Public Health Wales, Care Standards Inspectorate for Wales.
- Office for Product Safety and Standards
- Advisory groups, e.g. Food Hygiene Focus Group.
- Liaison with other Council services such as Business Rates, Planning and Building Control to inspect and review applications, Procurement and Schools Service;
- Liaison with the PH Wales Environment Sub Group and the Infection Control Committee and the Cardiff Health Alliance;
- Maritime and Coastguard Agency and stakeholders at the port including port operators;
- Directors of Public Protection Wales Port Health Expert Panel;
- Association of Port Health Authorities and the Ports Liaison Network;
- Welsh Government;
- Local Government Data Unit
- Cardiff International Airport and stakeholders at the airport including UK Border Force, airline operators, baggage handlers
- Public Health Wales including Consultants in Communicable Disease Control, microbiologists, laboratories at Llandough, Princess of Wales, Singleton and the Heath Hospitals
- Local Health Boards
- Animal and Plant Health Agency
- Centre for Radiation and Chemical & Environmental Hazards
- Crown and Magistrates Courts
- Public analyst laboratories, Minton Treharne and Davies, Cross Hands and Cardiff

3.9 Food and Feed Safety Promotion

Shared Regulatory Services is committed to promoting a positive food safety culture through a variety of channels. Promotion of food and feed safety will generally involve:-

- Provision of advice and information to businesses and members of the public through inspections, complaints and notifications;
- Provision of Food Hygiene training courses at both Level 2 and 3, and HACCP;
- Delivery of Food Safety Management and Safer Food Better Business training ;
- Provision of training courses in other languages based on local need;
- Leaflets covering food and feed issues;
- Participation in national events such as Food Safety Week;
- Promotion of Food Hygiene Rating Scheme;

- Guidance to assist businesses;
- Advice through Shared Regulatory Services website and other social media;
- Targeted education, advice and seminars.
- Where possible interventions and promotional activities are evaluated to learn how they can be improved for next time.
- Healthy Options Awards.

4. Resources

4.1 Financial allocation

The estimated financial expenditure on food and feed safety for 2023/24 is demonstrated in the following table. Legal charges are part of a central recharge and cannot be separately calculated. Investment in and renewal of information technology assets is funded centrally following a bid process based on the development of a business case.

	Budget 2021/22	Budget 2022/23	Budget 2023/24	Budget 2024/25			
	Bridgend Cardiff Vale of Glam	Bridgend Cardiff Vale of Glam	Bridgend Cardiff Vale of Glam	Bridgend	Cardiff	Vale of Glamorgan	Total
Staffing	2,126,294	2,068,929	2,322,822	520,735	1,329,734	520,735	2,371,205
Travel / Subsistence	34,410	28,375	29,055	6,912	16,590	5,603	29,105
Sampling	34,321	34,030	37,820	6,494	15,586	5,264	27,344
Supplies and services	74,010	65,880	30,785	13,070	31,367	10,593	55,030
Income	-20,000	-£1950	-3,950	-150	-1,860	-360	-2,370
TOTALS	2,249,035	2,195,264	2,416,532	547,062	1,391,417	541,835	2,480,314

The salary costs presented are representative of the staffing allocation outlined in section 4.2 and are costed at the top of the scale. The above budget does not include major investigations which are difficult to predict.

Income streams do exist within the Service which offset some service of the expenditure. These include the delivery of training, paid for advice and Primary Authority partnerships. Additional income is also provided through fees payable for re-scores and grants provided for promotional work.

4.2 Staffing allocation

The table below summarises the estimated number of posts required to meet the demands placed on the Food and Feed Service and deliver the core functions within. Staff numbers are shown in terms of full time equivalent posts (FTE).

Function	Bridgend		Cardiff		Vale		Total [FTE]	
	Food Safety	Food Stds	Food Safety	Food Stds	Food Safety	Food Stds	Food Safety	Food Stds
Premises Interventions	5.5	0.4	13.5	1.1	5.5	0.4	24.5	1.9
Food & Feed Hygiene Complaints	0.75	0.01	1.9	0.1	0.75	0.01	3.4	0.12
Home/Primary Authority	0.15	0.1	0.5	0.5	0.15	0.1	0.8	0.7
Advice to Business	0.5	0.1	1	0.4	0.5	0.1	2	0.6
Food and Feed Sampling	0.40	0.65	0.9	1.15	0.40	0.65	1.7	2.45
Food Poisoning	0.2	0	1	0	0.2	0	1.4	0
Food and Feed Safety Incidents	0.15	0.05	0.47	0.55	0.15	0.05	0.77	0.65
Liaison	0.08	0.03	0.27	0.05	0.08	0.03	0.43	0.11
Food & Feed Safety/ Standards Promotion	0.2	0.01	0.9	0.05	0.2	0.01	1.3	0.07
Management	0.72	0.22	1.55	0.44	0.72	0.22	2.99	0.88
Total Professional	8.65	1.57	21.99	4.34	8.65	1.57	39.29	7.48
Administration	2	0.18	4.25	0.35	2	0.18	8.25	0.71
Overall totals [FTE]	10.65	1.75	26.24	4.69	10.65	1.75	47.54	8.19

The tables below indicate the actual number of people resourced to work on Food and Feed safety and related matters (in terms of full time equivalents FTE) at 1st April 2024. While SRS is resourced for **40.29 FTE** to undertake Food and Feed Standards work, in practice this is significantly less. Levels of qualification are expressed with reference to the appropriate Food Safety Act Food Law Code of Practice and Practice Guidance and Feed Law Code of Practice, including support staff.

Successful delivery of the service plan is dependent on adequate staffing resources being maintained during the plan period. To deliver the full programme in accordance with the FSA requirements this would require additional resource over the existing budget. The additional resources required are highlighted beneath the following current resource tables.

Due to the backlog of food hygiene inspections that accrued as a result of the pandemic, contractors have been recruited to undertake additional food hygiene inspections to provide a temporary additional resource which are not included below.

Food Safety					
Position	Function	Qualification	FTE		
			Bridgend	Cardiff	Vale
Head of Shared Regulatory Services	Management of Environmental Health, Trading Standards and Licensing functions	Diploma in Trading Standards (DTS), Lead Auditor Qualification	0.02	0.06	0.02
OM Commercial Services	Includes management of public protection functions - food hygiene, port health and food poisoning and Trading Standards	MSc Environmental Health, Bsc Consumer and Trading Standards, Diploma in Trading Standards (DTS)	0.075	0.15	0.075
OM Enterprise & Specialist Services	Includes management of Industry Team which includes Food Hygiene, Food Standards and	BSc Environmental Quality and Resource Management	0.02	0.04	0.02

	Feed Hygiene functions; and also the Environment Team (Feed Hygiene)				
Team Manager (Food and Port Health)	Food safety management and liaison.	Environmental Health Officer (EHORB registered, competent to inspect all categories), Lead Auditor qualification	0.4	0.9	0.4
Team Manager (Health & Safety and Communicable Disease Team)	Community Health including food poisoning and liaison	Environmental Health Officer(EHORB registered)	0.06	0.12	0.06
Team Manager (Industry)	Management of Industry Team which includes Food Hygiene and Food Standards functions at Manufacturing Premises	Diploma in Trading Standards (DTS), Lead Auditor Qualification. MSc. Environmental Health	0.1	0.2	0.1
Staff Development Officer	Management of technical officers, contractors and the validation of officer competency.	Degree in environmental health or other suitable qualification required under the Food Law code of Practice.	0.2	0.5	0.2
Commercial Services Officers (Food and Port Health)	Food safety inc. 2 FTE for Port Health	Degree in environmental health or other suitable qualification required under the Food Law code of Practice.	4.23	12.47	4.23
Commercial Services Officers (CD)	Community health (food poisoning and infection control)	Degrees in in Environmental Health or equivalent science	0.23	0.46	0.23
Commercial Services Officer (Industry)	Food Safety & Food Standards at Manufacturing/Industrial Premises including EH Approvals	Degree in environmental health or other suitable qualification required under the Food Law code of Practice.	0.80	1.60	0.80
Technical Officer (Food and Port Health)	Food safety and port health	Degree in environmental health or other suitable qualification required under the Food Law code of Practice.	0.5	2	0.5
Technical Officer (CD)	Community health including food poisoning	Degrees in in Environmental Health or equivalent science	0	0	0
Commercial Services Officer (Business Engagement and Training) industry	Food Safety & Food Standards at Manufacturing/Industrial Premises	Ordinary & Higher Certificates in Food Premises inspection, Higher Certificate in Food Control	0.25	0.5	0.25
		Total Professional staff	6.23	19	6.93

	Overall total professional staff (including vacant posts, long term sick and re-purposed posts.	32.75
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In terms of food safety, while the service is currently resourced for 32.95 FTE professional staff, of these the service has one vacancy reducing that resource by 1 FTE. Even if all posts were fully occupied and operational, there would still remain a shortfall of **6.5 FTEs** needed to meet the demands placed on the Food Safety service and deliver the full Food Safety programme in accordance with the Food Law code of Practice and participate in all surveys with other local authorities.

Food hygiene officers have begun undertaking food standards inspections within prescribed premise types which are completed alongside the food hygiene inspection. As such the above table also contributes to the resource provided to food standards enforcement.

Food Standards					
Position	Function	Qualification	FTE		
			Bridgend	Cardiff	Vale
OM Commercial Services	Includes management of public protection functions - food hygiene, port health and food poisoning and Trading Standards	MSc Environmental Health, BSc Consumer and Trading Standards, Diploma in Trading Standards (DTS)	0.05	0.1	0.05
OM Enterprise & Specialist Services	Includes management of Industry Team which includes Food Hygiene, Food Standards and Feed Hygiene functions; and also the Environment Team (Feed Hygiene)	BSc Environmental Quality and Resource Management	0.02	0.04	0.02
Team Manager (Food and Port Health)	Food safety and food standards management and liaison.	Environmental Health Officer (EHORB registered, competent to inspect all categories), Lead Auditor qualification	0.05	0.1	0.05
Team Manager (Trading Standards)	Management of Commercial Services Trading Standards Team includes Food Standards and Feed Hygiene functions.	BSc Consumer and Trading Standards, DCATS, Lead Auditor	0.05	0.2	0.05
Team Manager (Industry)	Management of Industry Team which includes Food Hygiene and Food Standards functions at Manufacturing Premises	Diploma in Trading Standards (DTS), Lead Auditor Qualification, MSc. Environmental Health.	0.05	0.05	0.05

Commercial Services Officers (Trading Standards)	Food standards and feed hygiene functions.	Diploma in Trading Standards (DTS) or Diploma in Consumer and Trading Standards (DCATS).	0.73	1.55	0.73
Commercial Services Officer (Industry)	Food Safety & Food Standards at Manufacturing/Industrial Premises including EH Approvals	Diploma in Trading Standards (DTS) or Diploma in Consumer and Trading Standards (DCATS).	0.125	0.25	0.125
Commercial Services Officer (Food & Port Health)	Food safety in retail premises.	Degree in environmental health or other suitable qualification required under the Food Law code of Practice.	0.47	0.88	0.47
Technical Officer (Trading Standards)	Food standards and feed hygiene functions	DCATS Food and Agriculture module or equivalent.	0	0	0
Technical Officer (Food & Port Health)	Food safety in retail premises.		0	0	0
		Total Professional FTE	1.69	3.47	1.69
		Overall total professional FTE including vacant posts.	6.85		

There is shortfall of officers to meet the Food Standards inspection programme in accordance with the Food Law Code of Practice based on the same number of premises for Food Standards and Food Safety. It is recognised however, that such an increase in the number of officers required within this area is not financially viable for the service and consequently officers enforcing Food Safety were provided with training enabling them to enforce Food Standards legislation. This enables a multi skilled approach to the enforcement of food. In relation to high risk premises and referrals for non-compliances for the purpose of Food Standards, enforcement will remain with the Trading Standards teams. While the food standards work is resourced for 6.85 FTE, even if all posts were fully occupied and operational, there would still be an estimated shortfall of **1.34 FTE's** to meet current demands and deliver the full Food Standards programme in accordance with the Food Law code of Practice and participate in all surveys with other local authorities. It is envisaged however, that as more Food Safety Officers receive the necessary training, this figure may be reduced.

Feed Safety					
Position	Function	Qualification	FTE		
			Bridgend	Cardiff	Vale
OM Enterprise & Specialist Services	Includes management of Industry Team which includes Food Hygiene, Food Standards and Feed Hygiene functions; and also the Environment Team (Feed Hygiene)	BSc Environmental Quality and Resource Management	0.01	0.02	0.01
Team Manager (Trading Standards)	Management of Commercial Services Trading Standards Team	BSc Consumer and Trading Standards, DCATS including	0.0025	0.01	0.0025

	includes Food Standards and Feed Hygiene functions.	animal feed and animal health and welfare, Lead Auditor			
Team Manager (Industry)	Management of Industry Team which includes Food Hygiene and Food Standards functions at Manufacturing Premises	Diploma in Trading Standards (DTS), Lead Auditor Qualification, MSc. Environmental Health.	0.0067	0.0067	0.0067
Team Manager (Environment)	Management of Animal Health and Welfare Team	BSc, Environmental Health, Animal Health and Welfare Qualification	0.04	0.03	0.04
Commercial Services Officers (Trading Standards)	Food standards and feed hygiene functions.	Diploma in Trading Standards (DTS) or Diploma in Consumer and Trading Standards (DCATS).	0.05	0.1	0.05
Commercial Services Officer (Industry)	Food Safety & Food Standards at Manufacturing/Industrial Premises including EH Approvals	Environmental Health Officers & Trading Standards Officers	0.02	0.02	0.02
Animal Health & Welfare Officers	Feed hygiene on farm including sampling	Competency achieved through training, monitoring and assessment	0.10	0.046	0.010
		Total Professional FTE	0.23	0.23	0.0.23
		Totals			
		Overall Total (FTEs)	0.693		

There is no shortfall of Officers to meet the Feed Hygiene programme.

4.3 Staff Development Plan

Shared Regulatory Services approach to managing staff development is through the production of a Workforce Development Plan that provides a plan for developing the workforce to ensure the workforce has and maintains the right mix of experience, knowledge and skills required to fulfil our goals.

The Workforce Development Plan, provide a a framework that addresses wide ranging issues and bring together the following areas:-

- Developing organisational culture
- Leadership and management development
- Skills development
- Recruitment, retention and progression
- Communication and employee engagement
- Employee performance management

Continuing Professional Development (CPD) is actively encouraged and officers attend a wide range of training courses, seminars, meetings and briefings to help maintain competency and improve technical, legal and administrative knowledge. The new Food Law Code of Practice requires a

minimum of 20 hours CPD to be completed by all authorised officers. The Chartered Institute of Environmental Health and the Chartered Trading Standards Institute have mechanisms in place to monitor CPD of its members requiring 20 hours a year to be met for normal membership and 30 hours a year for chartered membership.

Regular food safety and standards training is carried out in house. At least one internal training session will take place each year.

All officers receive training in respect of new food and feed legislation and how it relates to establishments involved in the supply of products of animal and non animal origin. This is an ongoing process and officers will receive further training and guidance as required.

The Service also recognises the need for full technical support to be available to all Food and Feed Officers and this is achieved through a variety of ways, including internet subscription and library.

5. Quality Assessment

Shared Regulatory Services recognises the need to measure the effectiveness of its food and feed safety duties and strongly supports the ethos of continuous improvement. The Service therefore participates and undertakes a number of activities to ensure that work is of a high standard and opportunities to identify and implement improvements are taken.

Documented procedures

To ensure the quality and consistency of our activities, processes, procedures and work instructions for Food and Feed enforcement activities are documented within each local authority area. To ensure the quality and consistency of our activities and in accordance with the Food Standards Agency Framework Agreement, consistent procedures have been developed to harmonise the processes, and work across Shared Regulatory Services and are available to all Shared Regulatory Services staff.

Documented procedures identify responsibility for the work carried out and ensure that all changes identified through audit are carried out in accordance with improvement procedures. .

Assessment and audits

The monitoring of the quality of our policies and procedures is assessed in a number of ways, namely:-

- Internal audit of documented procedures and work instructions ;
- Audits undertaken by the Food Standards Agency.
- Customer consultation and feedback;
- Review of corporate complaints and compliments about the service.

In March 2017 an Audit was completed by the Food Standards Agency Wales of the delivery of official food controls in Shared Regulatory Services. This identified recommendations for incorporation into the Service to ensure best practise.

Customer consultation and feedback

We are committed to involving customers in the continuous improvement of services and recognise the need to have structured methods of obtaining service users views and perception of the service. The service sends a link to an online survey questionnaire to all food business operators across the SRS region following each planned food hygiene inspection visit asking a series of questions to gauge the business's satisfaction with the services they received and the impact the inspection has had on the business.

6. Review

6.1 Review against the Service Plan

It is the policy of Shared Regulatory Services to review performance against the Service Plan on an annual basis, supported with regular monitoring of performance measures to ensure continuous improvement throughout the year. Shared Regulatory Services has an effective performance management infrastructure in place for developing, delivering, monitoring and reviewing interventions which is undertaken through the following mechanisms:-

- The Joint Committee for the Shared Regulatory Service will approve this Service Plan setting out the work programme for the service and reviewing performance against the previous year's programme.
- Performance of the service is considered at team and management meetings on a monthly basis. Performance against strategic and local Performance Indicators is reviewed through a framework of management review meetings.
- Team and Food Service meetings allow for the effective management of work and are also one of the routes of communication that allow individual and team involvement in the development and delivery of interventions.
- Performance of individuals is managed through the #itsaboutme Scheme performance appraisal detailed in Section 4.
- Procedures and work instructions will be managed through a Shared Regulatory Service document control system.

6.1.1 Review of Food Hygiene Interventions 2023/24

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work and performance. The following sections identify those planned interventions due at the beginning of 2023/24 for Food Hygiene and reports on the delivery of those interventions together with information on enforcement activities.

The following table shows the proposed number of interventions at the start of the year, together with those that were actually undertaken and the overall % achievement. It should be noted that whilst the programme changes throughout the year as businesses close and new businesses open. The percentage achieved relates to performance at the end of the year as the programme has developed.

Food Hygiene Intervention Plan 2023/24										
Risk Category		Number of Interventions due at start of year (including any backlog)								
		Bridgend			Cardiff			Vale of Glamorgan		
		Due start of year	Actual completed	% programme achieved at end of year	Due start of year	Actual completed	% programme achieved at end of year	Due start of year	Actual completed	% programme achieved at end of year
HIGH RISK	A	2	2/2	100%	19	24/24	100%	1	5/5	100%
	B	34	27/27	100%	157	131/131	100%	62	56/56	100%
	C	177	390/390	100%	428	804/804	100%	153	322/322	100%
	High Risk Total	213	419/419	100%	604	959/959	100%	216	383/383	100%
MEDIUM-LOW RISK	D	0	91/127	71.65%	0	260/325	80%	1	84/108	77.78%
	E/AES*	0	12/85	14.12%	0	95/552	41.85%	0	25/77	32.47%
	Medium to low Risk Total	0	103/212	48.58%	0	355/877	40.48%	1	109/185	58.92%
NEW BUSINESSES	Unrated (New business at 1 April)	111	228/259	88.03%	344	649/737	88.06%	98	212/247	85.83%
	Unrated (New business identified during year)	Est 187			Est 517			Est 200		
	Total unrated	298	228	88.03%	861	649	88.06%	298	212	85.83%
REVISIT	Re-visits	Est 40	68	N/A	Est 213	311	N/A	Est 40	67	N/A
TOTALS		Est 551	818		Est 1678	2274		Est 555	771	

High Risk Food Business (A – C Rated)

In line with the Food Law Code of Practice 100% of all A, B and rated premises due an intervention received an intervention. At the start of the year, a significant backlog of C rated inspections were outstanding, however excellent progress was made through the use of contractors to support the work of Food Officers to tackle this, resulting in 100% of high risk food businesses being inspected.

The term high risk premises includes those businesses rated as:-

- category A (those premises requiring a visit every six months)
- category B (those premises requiring an annual visit)

- category C (those premises requiring a visit every 18 months)

D and E rated food businesses

Due to the need to prioritise A, B and C rated food premises and new businesses during 2023/24, D and E rated businesses were not prioritised during the year. Despite this a number of interventions did take place and these are reflected in the table above.

Inspection of New Businesses

As many as one in three UK businesses fail in the first three years. Establishing contact with new businesses in their first year of trading is an important part of the SRS strategy to promote and support the local economy. Early engagement with a business helps us to protect the public health and allows the SRS to work with food businesses and provide them with the opportunity to understand legal requirements.

Cardiff has a high turnover of business ownership which presents a challenge for the service, over and above the routine inspection programme. During 2023/24 a total of 889 new business inspections were planned across the region, with 519 of these being in Cardiff representing 58% of new businesses across the three areas. In Bridgend and the Vale of Glamorgan 189 and 181 new businesses were identified in each area. Despite a long standing backlog of new business inspections, excellent progress was made during the year, through the use of contractors to support the work of Food Officers, to tackle both the backlog and new registrations that were submitted throughout the year.

Food Hygiene Revisits

Inspection of food businesses often requires follow up visits to ensure compliance with food safety requirements. The intervention and revisit procedure requires that all businesses rated 0 are revisited within 28 days and all those rated 1 or 2 are revisited within 3 months. The number of revisits is difficult to predict, and is determined by the number of full inspections undertaken and the compliance of the business at the time of inspection.

Appeals

Food businesses have a right under Section 5 of the Food Hygiene Rating (Wales) Act 2013 to appeal the food hygiene rating given to the establishment if, they do not agree that the rating properly reflects the hygiene standards found at the business at the time of the inspection or that they believe that the rating criteria was not applied correctly when producing the rating. Businesses have 21 days from the date of receipt of the notification letter to lodge an appeal and similarly businesses should receive the outcome of the appeal within 21 days from the date the appeal was received. During the last year SRS received 27 appeal applications (Bridgend 3, Cardiff 22 and Vale 2) .

FHRS Re-scores

In addition to appeals, food business operators also have a right to request a rescore inspection for the purpose of re-rating under the Food Hygiene Rating Scheme. This request can be made anytime after the statutory inspection, provided that businesses have made the required improvements. In these circumstances, SRS are permitted to recover costs for such an inspection and charge a fee accordingly and are required to undertake a re-visit within 3 months. During 2023/24, 56 re-score requests were made (12 in Bridgend, 31 in Cardiff and 13 in the Vale)

Inland Imported foods

During the inspection of food businesses, officers consider the origin of imported foods. Any indications that food may not have been subject to correct import controls are investigated and, where necessary, the food is removed from the food chain.

Food Safety Projects

In addition to routine inspections of food businesses, SRS typically participates in a number of planned food safety surveys which entail various sampling programmes across a range of businesses. Due to lack of resources these activities were limited during 2023/24, however the following projects did take place.

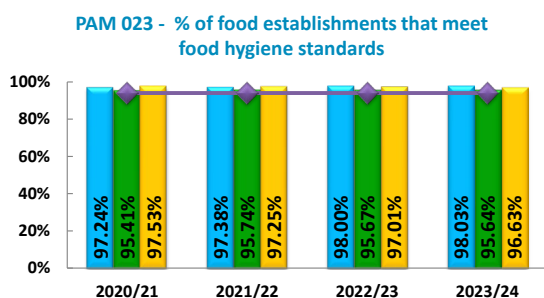
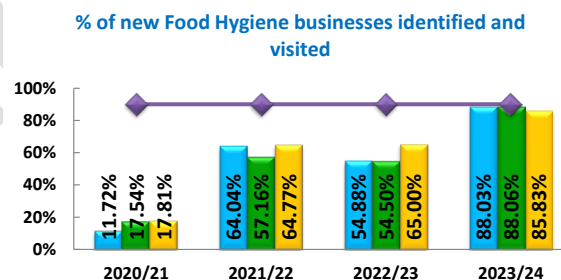
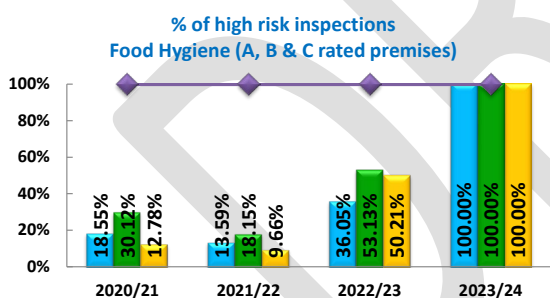
Targeted surveys – Targeted surveys relating to cheese, ready to eat salads and cooked chicken began in Jan 2024 and will continue throughout the 2024. 152 samples were taken up to the end of March 2024, one of which resulted in a cheese sample from a Cardiff business testing positive for Listeria. This prompted a follow up investigation by an environmental health officer identifying an infestation of mice and other hygiene issues resulting in closure of the business until the imminent risk was removed.

Port Health waters – 6 samples were taken from Cardiff and Barry Docks and no issues were found.

Performance Measures

The following graphs show the results for the last 4 years for performance measures relating to food hygiene.

■ Bridgend ■ Cardiff ■ Vale of Glamorgan

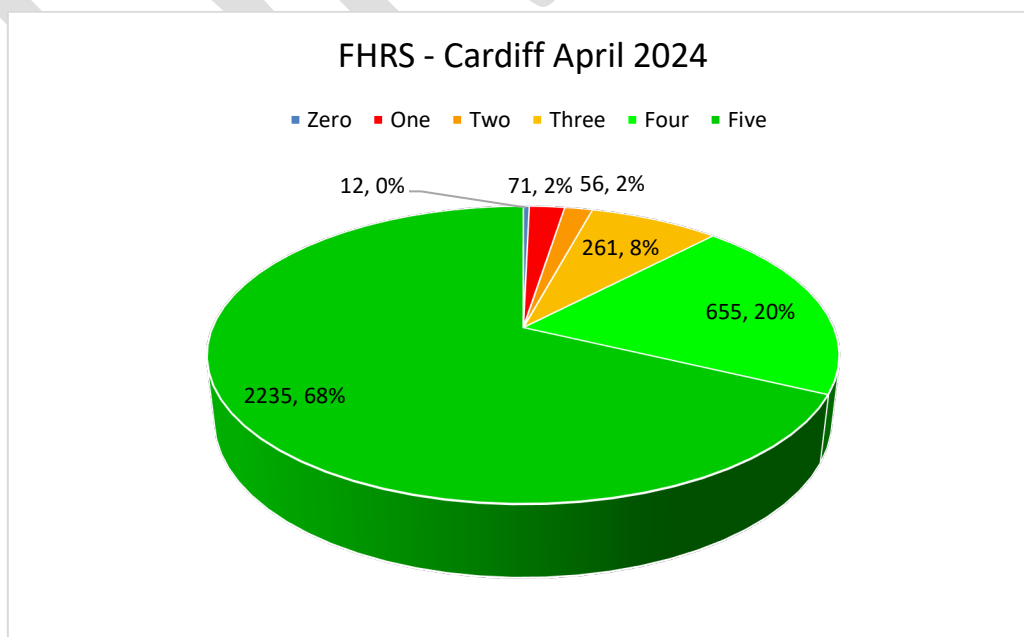
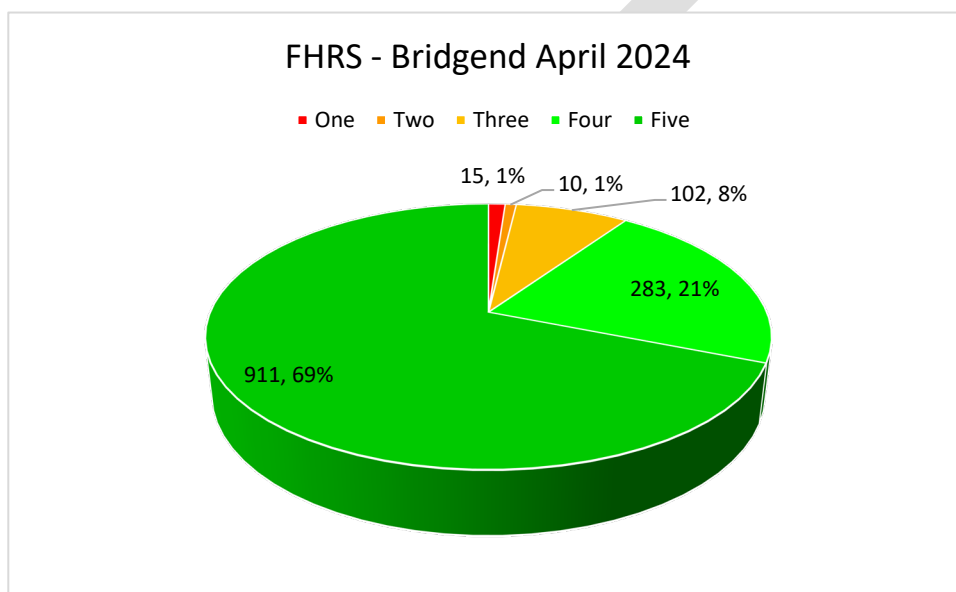


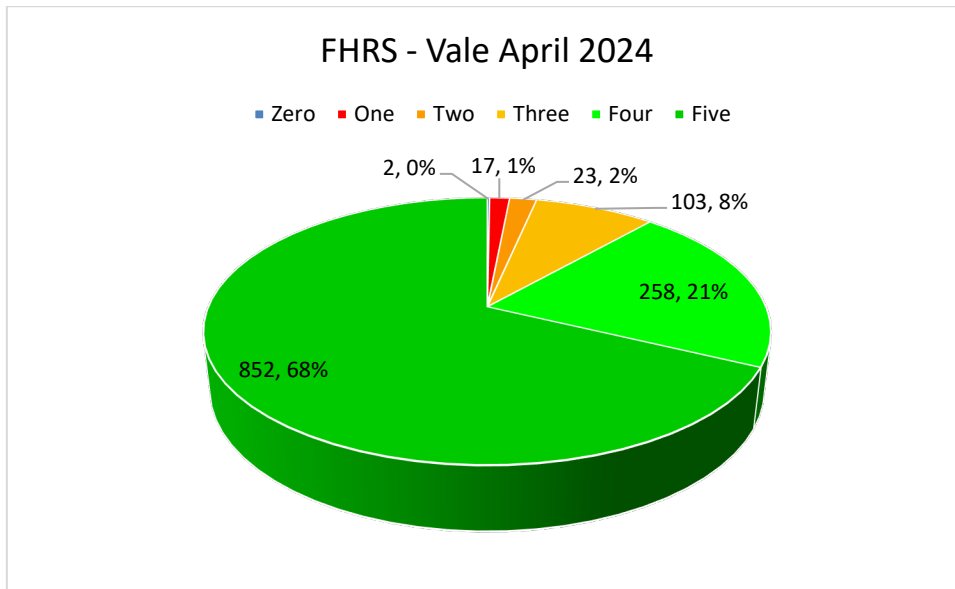
The broadly compliant figure indicates the number of businesses who have managed to achieve a food hygiene rating of 3 or above. Whilst SRS endeavours to improve compliance through advice, guidance or enforcement, ultimately the score achieved depends on the willingness of the food business operator to make and maintain improvements.

Broadly compliant businesses and the Food Hygiene Rating Scheme - In November 2013 a statutory food hygiene rating scheme was introduced throughout Wales where on receiving a food hygiene inspection, premises receive a hygiene rating from zero to five. Businesses with a food hygiene rating of 3 and above are classed as broadly compliant in meeting food hygiene standards and the

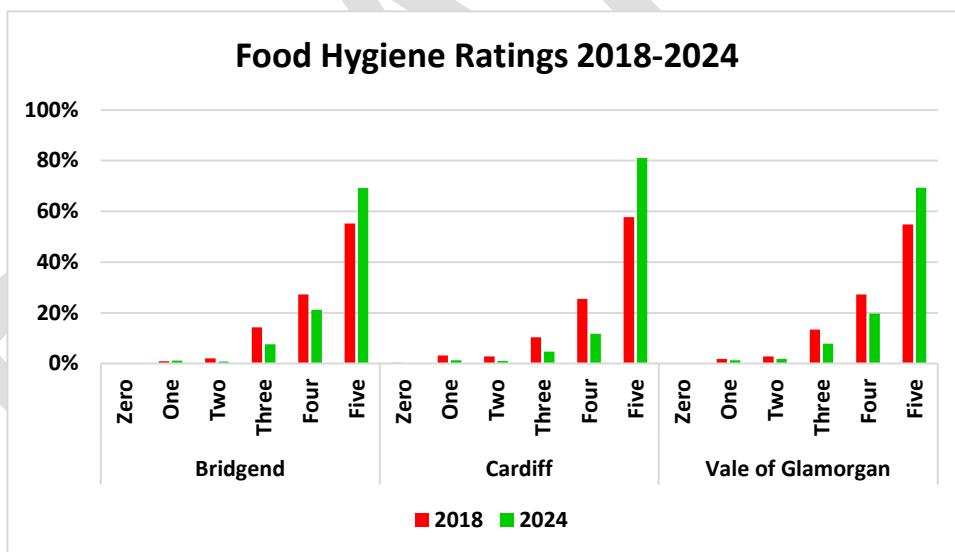
graph above (PAM 023) shows the percentage of food businesses that meet this criteria across the region over the last 4 years. The number of food businesses with a food hygiene rating of more than 3 continues to remain at a high level with 98.03% in Bridgend, 95.64% in Cardiff and 96.63% in the Vale of food businesses being broadly compliant. The results show a stabilisation over recent years exceeding targets and highlighting the growing number of businesses that are improving their standards, which can be attributed to the success of the intervention programme for food businesses. That programme ensures that any food safety issues identified are followed up by either enforcement, advice or training and subsequently revisits to ensure compliance with food safety law.

The following charts highlight the ratings of businesses across the region . A breakdown of the scores across Bridgend, Cardiff and Vale of Glamorgan can be found below.





The Scheme has had a positive impact in improving standards in food businesses and the following graph demonstrates how over a 6 year period the percentage of businesses that have a '5' rating, the highest rating that can be achieved, has increased while the number of low scoring businesses has dropped.



Customer Satisfaction

Following the move to online customer feedback questionnaires, responses in relation to the inspection process have been disappointingly poor. As a result we are unable to provide results for feedback during 2023/24.

Prosecutions and enforcement action

SRS is committed to enforcing the laws we regulate, instigating legal proceedings against those businesses or individuals that flout the law. During 2023/24 the service successfully prosecuted 8

individuals/businesses in relation to food offences and the following cases showcase a few selected examples.

Cardiff Convenience Store and company director fined over £10,000 for food hygiene offences –

On visiting the store in July 2022, officers found mouse droppings in storerooms and around packets of foods on the shelves of the shop together with gnawed packets of crisps and chocolates. As a result, officers deemed there to be an imminent risk to health and the company director agreed to voluntarily close the premises to allow effective cleaning to take place, signing a voluntary closure agreement to this effect. However, a few days later officers discovered the premises open with customers inside, which necessitated a formal court order being obtained to require the premises to remain closed while the infestation was dealt with and thoroughly cleaned.

While guilty pleas were subsequently entered for the majority of the 16 food hygiene offences, the defendants maintained that they were not trading when visited, but simply taking in a delivery. This necessitated a Newton hearing in which the District Judge found the evidence presented persuasive and the prosecution case approved.

In passing sentence the District Judge was satisfied that the offences were committed with high culpability and posed a serious and imminent risk to the public. The company was subsequently fined a total of £8000, ordered to pay costs of £1456.65 and a court surcharge of £2000. The company's sole director was fined a total of £2900, ordered to pay costs of £1456.65 and a court surcharge of £1160.

Bridgend restaurant involved in food hygiene prosecution - Following an investigation by SRS officers, two directors involved in the operation of a Bridgend restaurant pleaded guilty to 8 offences under the Food Hygiene (Wales) Regulations 2006.

On receipt of a complaint from the public reporting that rats had been seen inside the restaurant, officers visited the premises and discovered an active pest infestation, together with a range of other issues. These included a lack of effective pest control procedures in place, poor general hygiene and cleanliness throughout the premises and lack of personal hygiene and no food management safety system in place. As a result of the inspection findings, the restaurant's Food Hygiene Rating Scheme score was downgraded to zero, indicating that urgent improvement was required.

In light of the inspection findings, the business voluntarily closed to undertake a deep clean of the premises, fix all pest access points, and eradicate the infestation. When visited 6 days later it was found that the business had made significant improvements and the rat infestation had been eradicated. There was however still an absence of hand soap but once this was replenished the voluntary closure notice was revoked.

The District Judge fined the first of the two defendants a total of £380 and ordered him to pay costs of £250 together with a victim surcharge of £152. The second defendant was fined a total of £235 and ordered him to pay costs of £125 and a victim surcharge of £95. In addition, the first defendant was permanently prohibited from participating in the management of any food business in future.

In addition to legal proceedings, the following enforcement actions were undertaken:-

Food Hygiene Enforcement Actions 2023/24			
Type	Bridgend	Cardiff	Vale of Glam
Voluntary closure	1	31	3
Seizure, detention and surrender of food	2	22	5
Suspension/revocation of approval or licence	0	1	0
Hygiene Emergency Prohibition Notice (Formal)	0	1	0
Prohibition Order	0	0	0
Simple caution	0	2	0
(Hygiene)Improvement notice	8	47	36
Remedial action notices	3	9	6
Written Warnings	459	1676	423
Prosecutions concluded	1	6	0
Fixed penalty notices	1	14	4

6.1.2 Review of Food Standards Interventions 2023/24

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work. The following sections identify those planned interventions due at the beginning of 2023/24 for Food Standards and reports on the delivery of those interventions together with information on enforcement activities.

The following table shows the proposed number of interventions, together with those that were actually undertaken and the overall % achievement. The number of interventions due fluctuates during the year as premises close and new businesses open. The % achievement therefore represents those that were due and which were carried out throughout the year, rather than against those that were due at the beginning of the year.

Food Standards Intervention Plan 2023/24

Risk Category	Number of Interventions due at start of year (including any backlog)								
	Bridgend			Cardiff			Vale of Glamorgan		
	Due start of year	Actual completed	% programme achieved at end of year	Due start of year	Actual completed	% programme achieved at end of year	Due start of year	Actual completed	% programme achieved at end of year
High Risk	7	7/7	100%	10	7/7	100%	6	6/6	100%
Medium Risk	0	71	N/A	0	95	N/A	0	39	N/A
Low Risk	0	340	N/A	0	548	N/A	0	85	N/A
New Business	Est 314	234/298	78.52%	Est 1130	722/1072	67.35%	Est 406	250/373	67%
Unverified businesses <small>Errors within the database on set up</small>	15	5	33.33%	244	186	76.22%	3	1	33.33%
Re-visits	0	2	N/A	12	5	N/A	1	2	N/A
Total	336	659		1396	1563		416	383	

High risk interventions

During 2023/24 100% of the high risk inspection programme was achieved across Bridgend, Cardiff and the Vale of Glamorgan.

Medium and low risk interventions

During 2023/24 the food standards element of the service was resourced to only deliver an inspection programme for high risk and new businesses with food hygiene officers completing medium to low risk food standards inspections alongside programmed food hygiene inspections.

As a result of this new way of working, no target was set at the beginning of the year, however through this method of intervention, the service undertook 411 interventions in medium and low risk businesses in Bridgend, 643 in Cardiff and 124 in the Vale of Glamorgan.

New Businesses

Early engagement with a business helps us to protect the public health and allows the SRS to work with food businesses and provide them with the opportunity to understand often complex legal requirements.

Cardiff has a high turnover of business ownership which presents a challenge for the service, over and above the routine inspection programme. The Food Law Code of Practice requires new businesses to be inspected within 28 days, which can become challenging due to food businesses often registering with the service but not ready to trade within the 28 days.

Unverified businesses

Unverified businesses are those businesses recorded on the SRS database that have yet to be rated. Unlike new businesses which are also unrated, these are business records that when transferred from our former database to the new Tascomi database contained errors. Work has been carried out to remedy this situation since they were first identified with 192 businesses rated across the region during 2023/24. There still remains a number of unverified businesses and these will need to be addressed during 2024/25.

Re-visits

Inspection of food businesses can require follow up visits to ensure compliance with food standards requirements. The number of re-visits is difficult to forecast however an estimate is made based on the actual number carried out in the previous year. Results show that 2 re-visits were undertaken in Bridgend, 5 in Cardiff and 2 in the Vale of Glamorgan.

Food Standards Projects

In addition to routine inspections of food businesses, SRS participates in a number of planned food standards surveys which entail various sampling programmes across a range of businesses, these included:-

Food Matrix	Analysis	Number of Samples Taken	Satisfactory	Non satisfactory
Glamorgan Group – Honey Survey	HMF levels 10 samples were taken across SRS and submitted to the analyst to check HMF (Hydroxymethylfurfural content) levels, floral & geographical origin pollen analysis and labelling checks.	10 samples were taken 6 Cardiff 1 VOG 3 Bridgend	All samples were compliant with compositional requirements.	7 samples were non compliant with labelling requirements and were referred internally for further advice.
Glamorgan Group – Allergen market surveillance	This survey was undertaken to establish if caterers at retail premises are able to provide safe, allergy free meals on request and if the customer/ sampling officer is provided with any information on the allergenic status of the food produced by the takeaway. 30 samples were submitted to the analyst to check for the presence of the allergen declared. A variety of allergens were declared at the point of sale including, milk, gluten, crustaceans	29 samples were taken across SRS 13 x Cardiff 8 x Vale 8 x Bridgend	23 samples passed	6 samples failed in that the allergen declared was present in the meal rendering the food unsafe.
OPSON - FSA funded project TBC	No sampling was undertaken during this period for the GG due to the high number of follow up work generated by the allergen survey and number of outstanding food standards inspections.			

Informal Sampling – 35 visits were carried out across SRS where officers obtained informal samples as a result of food complaints received by the department or to follow-up concerns identified during inspections. Most of these complaints/concerns related to the ability of food businesses to accurately identify the allergen ingredients in the food and a failure by the business to provide this to consumers on request. A minority of complaints concerned the menu descriptions, specifically questioning the species of meat used against the menu description.

A further 20 formal samples were taken across SRS where the original sample taken was unsatisfactory. The unsatisfactory results were because they contained an ingredient, despite officer advising the server they were allergic to that ingredient, or the description applied to the foods were misleading. These businesses have been provided with written guidance and warnings in relation to the non-compliance. These businesses will also be subject to future sampling to ensure that issues identified have been rectified. One business is currently under investigation. A total of 94 written warnings have been issued for food standards breaches of legislation during this period and 3 Food Information Wales Improvement Notices were issued to non complaint premises. These notices are formal requests to businesses to comply with a certain piece of legislation. They outline the breaches and the corrective actions required by the FBO with a certain time period. It is issued as part of a progressive and proportionate process in assisting the business to reach compliance.

Prosecutions and enforcement action

Food Standards Enforcement Actions 2023/24			
Type	Bridgend	Cardiff	Vale of Glam
Voluntary closure	0	0	0
Seizure, detention and surrender of food	0	0	0
Suspension/revocation of approval or licence	0	0	0
Emergency Prohibition Notice (Formal)	0	0	0
Prohibition Order	0	0	0
Simple caution	0	0	2
Improvement notice	0	0	0
Written Warnings	9	49	36
Prosecutions concluded	0	1	0

6.1.3 Review of Feed Safety Interventions 2023/24

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work. The following sections identify those planned interventions due at the beginning of 2023/24 for Feed Safety and reports on the delivery of those interventions together with information on enforcement activities.

Feed Safety Intervention Plan 2023/24				
Type	No. of inspections due			
	Bridgend	Cardiff	Vale of Glam	Total
Inland Feed inspections				

	Due	Actual	Due	Actual	Due	Actual	Due	Actual
Manufacturer (A01-08 and R01-04)	0	0	0	0	0	2	0	2
Co Product Producer (R12)	2	0	0	0	0	2	2	0
Mobile mixer (R04)	0	0	0	0	0	0	0	0
Importers	0	0	0	0	0	0	0	0
Stores (R09)	0	0	0	0	0	0	0	0
Distributor (A01-08, R01-03, & R05)	0	0	0	1	0	0	0	1
Transporter (R08)	0	0	1	0	0	0	1	0
On farm mixer (R10 Annex II)	0	1	0	0	1	0	1	1
On farm mixer (R11)	1	2	0	0	4	2	5	4
Pet food manufacturer (R06)	1	0	1	0	1	0	3	0
Supplier of feed materials/surplus food (R07)	0	1	4	5	2	2	6	8
Total inland feed inspections	4	4	6	6	8	8	18	18
Feed Hygiene at Primary Production inspections								
Livestock farms (R13)	38	20	5	0	45	47	88	67
Arable Farms (R14)	0	0	0	0	1	2	1	2
Total Feed Hygiene at Primary Production inspections	38	20	5	0	46	49	89	69
Miscellaneous								
Poultry slaughterhouse (435)								
Unknown								
No code assigned								
Total miscellaneous								
Total feed premises/inspections	42	24	11	6	54	57	107	87

High risk businesses

The number of high risk interventions due at the beginning 2023/24 was not identified in the Intervention Plan for that year, however a target of 100% was assigned through the SRS performance framework. During 2023/24 only one high risk animal feed business inspection was programmed in the Vale of Glamorgan and this was completed.

New business

The estimated number of new businesses due an intervention at the beginning of 2023/24 was not identified in the Intervention Plan for that year, however a target of 80% was assigned through the SRS performance framework. The Service failed to meet that target achieving 35.29% in Bridgend, 10% in Cardiff and 64.70% in the Vale of Glamorgan. The number of new feed businesses is relatively low however the number outstanding at the end of the year related to 31 premises.

Re-visits

The estimated number of re-visits due at the beginning of 2023/24 was not identified in the Intervention Plan for that year, as these are impossible to forecast. No re-visits however were undertaken during the year.

Feed Safety Projects

No feed projects were undertaken due to no funding being available and limited resources within the team to undertake additional proactive project work

Prosecutions and enforcement action

No prosecution or enforcements were undertaken during 2023/24.

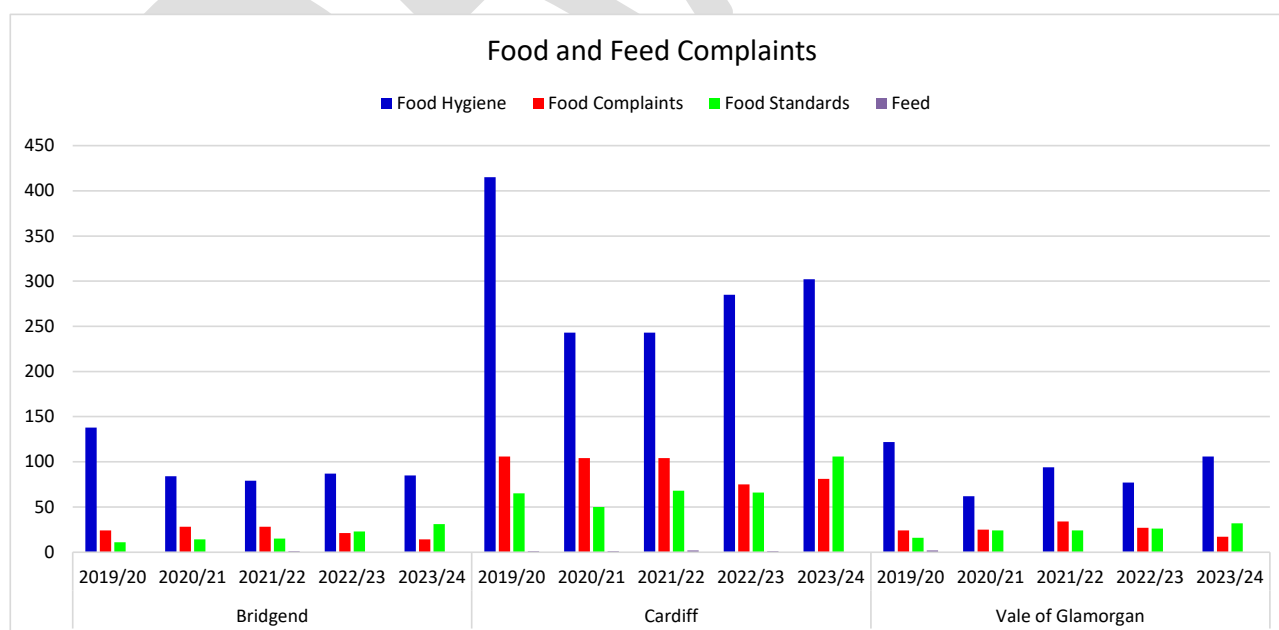
6.1.4 Complaints

Based on the requests received during the previous year, it was estimated that the service would receive 688 service requests during 2023/24 however the actual number was 744 (Bridgend 130, Cardiff 489 and Vale 155). The table below provides a breakdown of the estimated number and the number actually received and investigated in accordance with the Local Authority Enforcement Monitoring (LAEMs) Report.

Complaint type	Bridgend		Cardiff		Vale of Glamorgan	
	Estimate	Actual	Estimate	Actual	Estimate	Actual
Food Hygiene	87	85	285	302	77	106
Food Complaints	21	14	75	81	27	17
Food Standards	23	31	66	106	26	32
Feed Safety	0	0	1	0	0	0
Total	131	130	427	489	130	155

The following graphs shows a breakdown of the complaints received over the last 5 years by type. It can be seen that Cardiff receives significantly more complaints than both Bridgend and the Vale of Glamorgan, almost double of the two areas. This is to be expected due to the large number of businesses in Cardiff.

The number of complaints received regarding Animal Feed is very low. Last year one complaint were received.



The table below shows the total number of food and food hygiene complaints received by the service during 2023/24 along with the timeliness of response in accordance with the set target date set. NB. The total figures below differ from those above due to the service requests including premises located outside the SRS area, for example in the case of Primary Authority service requests.

Complaints	Bridgend				Cardiff				Vale of Glamorgan			
	No. received SRS Complaints report	Target days	No. within target	% inside target	No. received SRS Complaints report	Target days	No. within target	% inside target	No. received SRS Complaints report	Target days	No. within target	% inside target
Food Hygiene												
Food Practices	22	3	18	81.82%	54	3	38	70.37%	25	3	20	80.00%
Food Premises	57	1 to 3	48	84.21%	192	1 to 3	154	80.21%	59	1 to 3	53	89.83%
Water disconnections	16	1	16	100.00%	85	1	78	91.76%	23	1	21	91.30%
Accumulation of refuse	1	3	1	100.00%	1	3	1	100.00%	1	3	1	100.00%
Alleged food poisoning	0	1	0	N/A	6	1	4	66.67%	3	1	2	66.67%
Salmonella Notification	0	1	0	N/A	2	1	2	100.00%	0	1	0	N/A
Referral from other LA	0	3	0	N/A	10	3	6	60.00%	6	3	6	100.00%
Food												
Food chemical	1	1	1	100.00%	2	1	2	100.00%	0	1	0	N/A
Food (foreign body)	9	3	6	66.67%	45	3	35	77.78%	11	3	10	90.91%
Food (microbiological)	3	1 to 3	3	100.00%	43	1 to 3	41	95.35%	5	1 to 3	4	80.00%
Food out of condition	1	3	1	100.00%	1	3	1	100.00%	2	3	2	100.00%
Food unsafe	1	3	1	100.00%	0	3	0	N/A	1	3	0	0.00%
Total no. received	111				441				136			

In addition to complaints, the service also receives a number of service requests that require a timely response and the table below shows the number of service requests received and the timeliness of response against the set target.

Service requests	Bridgend				Cardiff				Vale of Glamorgan			
	No. received	Target days	No. within target	% inside target	No. received	Target days	No. within target	% inside target	No. received	Target days	No. within target	% inside target
Food Hygiene												
Approval application	0	10	0	N/A	2	10	2	100.00%	0	10	0	N/A
Covid 19 related	0	1	0	N/A	0	1	0	N/A	0	1	0	N/A
Export Certificates	1	3	1	100.00%	0	3	0	N/A	3	3	1	33.33%
FHRS Appeal	3	21	3	100.00%	20	21	20	100.00%	2	21	2	100.00%
FHRS early publication	0	14	0	N/A	21	14	12	57.14%	4	14	3	75.00%
FHRS Non display	9	3	8	88.89%	22	3	19	86.36%	3	3	3	100.00%
FHRS Promo Regs	0	5	0	N/A	0	5	0	N/A	0	5	0	N/A
FHRS Re-score	12	5	12	100.00%	31	5	24	77.42%	13	5	12	92.31%
FHRS Right to reply	0	3	0	N/A	2	3	0	0.00%	0	3	0	N/A
FOI request	2	14	1	50.00%	14	14	11	78.57%	5	14	3	60.00%
Food Advisory visit	1	3	1	100.00%	1	3	1	100.00%	1	3	0	0.00%
Food Delivery Service	0	10	0	N/A	0	10	0	N/A	0	10	0	N/A
Food hygiene enquiry	180	5	145	80.56%	766	5	643	83.94%	199	5	188	94.47%
Food registration	45	5	35	77.78%	65	5	48	73.85%	71	5	64	90.14%
FSA Food Alert	1	1	1	100.00%		1		N/A	1	1	1	100.00%
FSA Information Notification	0	5	0	N/A	2	5	2	100.00%	2	5	2	100.00%
Planning consultation	0	10	0	N/A	38	10	28	73.68%	0	10	0	N/A
Primary Authority	4	14	4	100.00%	4	14	4	100.00%	562	14	555	98.75%
Request for FHRS sticker	6	3	5	83.33%	28	3	20	71.43%	12	3	9	75.00%
Request from FSA	0	10	0	N/A	3	10	3	100.00%	0	10	0	N/A
Total no. received	264				1019				878			

6.1.5 Home Authority Principle and Primary Authority

SRS now has some 35 Primary Authority partnerships in place with both local and national businesses and is able to charge for the work done as part of these arrangements on the basis of full cost recovery. Of those Partnerships, and despite the new regulatory scope approach within the changes to Primary Authority, 27 are more likely to request or be given advice and support from a Food or Feed perspective.

- Bravura Foods Ltd
- Cadwaladers (Cardiff) Limited
- Cardiff and Vale University Healthboard
- Filco Supermarkets
- Federation of Independent Retailers
- In the Welsh Wind Distillery
- Just Perfect Catering
- One Stop
- PJ & RP Best Limited
- Royal Voluntary Service
- Sloane Home Limited
- Vale Hotel & Resort
- Venture Life Healthcare Ltd
- Wallice Main Ltd
- Wild Water Group
- Wine and Spirit Trade Association.

Devolved Welsh Partnerships:

- Association of Convenience Stores
- Hallmark Care Homes
- HC-One Care Homes
- Health Food Manufacturers Association
- John Lewis
- Marstons
- Mitchells and Butlers
- Sainsbury's
- Tesco
- The Bannatyne Group plc.
- Waitrose

6.1.6 Advice to business

Shared Regulatory Services assists businesses by providing food and feed safety advice through a variety of channels, such as:-

- **Advice provided as part of the inspection process** – The service continues to provide food and feed safety advice as part of the inspection process, receiving the comments such as those below in relation to food safety inspections.
- **Responding to complaints and requests for service** – See 6.1.4 above.

- **Twice yearly food newsletter** - The Service's commitment to advising and supporting food businesses to achieve legal compliance and the highest possible standards continues with our twice yearly newsletter 'Food and Safety News', aimed at food businesses to inform, educate and advise on responsible food safety and health and safety across Bridgend, Cardiff and the Vale of Glamorgan.
- **Provision of information leaflets** - The service provides guidance leaflets for new businesses that are starting out, home caterers, childminders, nurseries, event catering and also good practice hygiene guide for lower risk premises. There is also an event organisers guide to ensure that all food safety matters are considered during the planning of an event.
- **Promotion and participation in national events, such as Food Safety Week** – SRS regularly issues press releases and food tweets in relation to campaigns such as promoting tips on safely preparing turkey at Christmas.
- **Participation in working groups, such as Events Liaison Panel** – In order to ensure proper co-ordination with all partner agencies in preparation for the smooth running of major events, the Service is part of the Events Liaison Panel at Cardiff Council and the Events Safety Advisory Groups at both Bridgend and the Vale of Glamorgan. Having the capital city based within the SRS region and the coastline, there are lots of large events that are that attracted to the area such as the Elvis Festival held in Porthcawl, the Homeless World Cup, Mardi Gras and Winter Wonderland events in Cardiff and Vale Agricultural Show and Cowbridge Food and Drink Festival. These along with many others received advice, comments or visit support on food safety, health and safety, trading standards, pollution, licensing and specialist areas such as water usage.
- **Advice through Shared Regulatory Services website** – A wide range of information is available on the SRS Website which is continually reviewed and updated.
- **Food Business Forums** – Events such as the Food Safety Events held in 2017 and 2019 hosted by SRS provide the opportunity to engage with food businesses and provide training on new legislation, topical issues or guidance to improve food safety compliance. Whilst no events took place in the last financial year, we value the opportunity to use these events to improve standards in food businesses and promote our tailored advice services.
- **Practical targeted training** – SRS provides accredited training to individuals through its Level 2 and 3 Food Safety and Level 2 Health and Safety Courses and HACCP and Allergens. SRS has further expanded the training being offered for businesses and now delivers training both face to face and online, to provide more choice and flexibility for food businesses.
- **Paid for food hygiene advice visits available to all applicable food businesses** - Shared Regulatory Services offers a paid for advice service to businesses. A fee of £80 +VAT per hour is charged for an on site advice visit tailored to the businesses needs with a follow up written report.

6.1.7 Food and Feed Sampling

The service receives an allocation from Public Health Wales for the microbiological analysis of food and water samples. Unfortunately last year, the service was unable to utilise the available budget due to the Covid-19 pandemic and the issues this presented.

The majority of informal food samples taken for surveillance and monitoring purposes are assessed using the criteria contained in the “Guidelines for Assessing the Microbiological Safety of Ready-to-Eat Foods Placed on the Market”, revised HPA Guidance 2010 and Microbiological Criteria for Foodstuffs (EC Regulation 2073/2005). Most of these samples will be of an informal nature but the provisions of the Food Law Code of Practice will be followed when formal samples are required e.g. where a prosecution could result.

Food Standards

In relation to Food Standards, SRS carried out a number of surveys during 2023/24 which are highlighted in Section 6.1.2 of this Plan.

Feed Safety

No feed sampling programme was undertaken during 2023/24.

6.1.8 Control and investigation of outbreaks and food related infectious disease

Each year an intervention plan is prepared to identify the number of interventions due at the start of the year together with any targeted intervention activities including specific project work. The following section highlights the number of expected interventions due at the beginning of 2022 and the numbers carried out together with information on other activities. More detailed information can be found in the Communicable Disease and Health Protection Service Plan 2024/25.

Communicable Disease Intervention Plan 2023						
Type	Number of Interventions estimated at start of year and the actual number carried out					
	Bridgend		Cardiff		Vale of Glamorgan	
	Due based on estimate	Actual	Due based on estimate	Actual	Due based on estimate	Actual
Total No. of food poisoning notifications	91	85	216	165	76	64
No. of food related outbreaks	2	0	2	0	0	0

In 2023, SRS was notified of 6,079 cases of communicable disease of which 5,856 were laboratory confirmed of which 4% (223) were unconfirmed food poisoning cases.

The figures below illustrate the distribution of cases (confirmed and unconfirmed) across the 3 Local Authority areas.

	Notified CD Cases (¹ CFP)	Unconfirmed CD Cases	Total CD Cases
Bridgend	1432 (85)	23	1455
Cardiff	3120 (165)	170	3290
Vale	1304 (64)	30	1334
TOTAL	5856 (314)	223	6079

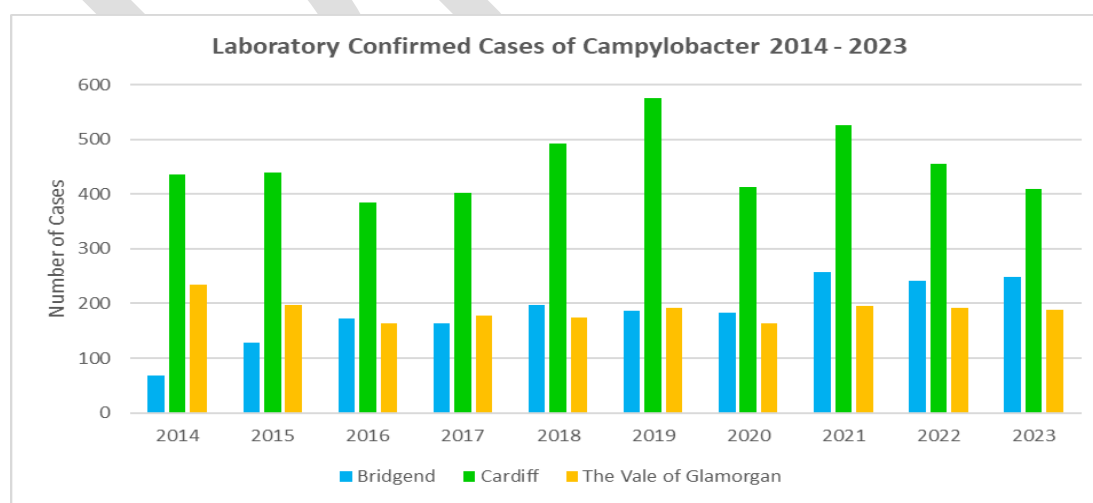
¹CFP – confirmed food poisoning as applied in the ‘Disease’ tab in Tarian

A significant decrease in the number of **confirmed cases of communicable disease** continued throughout 2023, reflecting the national decline in confirmed cases of COVID-19. This reduction in COVID-19 cases aligned with a step change to the national testing policy of symptomatic people across Wales and a continuation of the vaccination programme for higher risk cohorts.

The incidence of Campylobacter infection throughout SRS far exceeds other notifiable diseases, with the exception of COVID-19, which reflects the national trend observed across the UK. Campylobacter species are the most common bacterial cause of infectious gastrointestinal disease in developed countries due to its small infectious dose (<500 organisms can cause disease) and the range of environments where the pathogen can survive and thrive.

Common risk factors associated with confirmed cases of Campylobacter include: foreign travel; consumption of undercooked poultry and poultry offal (i.e. ‘pink’ chicken livers); consumption of unpasteurised dairy products; consumption of contaminated drinking or leisure water; direct contact with animals/birds and their faeces; close contact with the faeces of an infected person (i.e. changing nappies of an infected child) and subsequent poor hand hygiene; cross-contamination associated with the growing popularity of feeding pets a raw meat diet; the accidental consumption of raw/part-cooked chicken products and the practice of washing raw chicken packaging for recycling (where the bacteria becomes splashed onto adjacent surfaces and subsequently transferred onto hands, ready-to-eat foods or other equipment).

Graph: Reported cases of Campylobacter from 2014 – 2023



As a whole, SRS received 847 confirmed cases of Campylobacter in 2023 compared with 888 in 2022; 980 in 2021; 759 in 2020; 954 in 2019 and 741 in 2017.

All confirmed cases reported in 2023 were sporadic and not linked to any known outbreaks.

Since 2021 Bridgend has seen a notable increase in confirmed cases when compared to pre-pandemic numbers, whilst case numbers in the Vale of Glamorgan have remained relatively stable. Reported cases in Cardiff have continued a downward trajectory in post-pandemic years and are markedly lower than case numbers seen in 2019.

Pathogens of public health significance (other than Campylobacter) commonly require more detailed investigation; either because the pathogen can be more readily spread throughout households and the wider community, or because of the seriousness of the infection. The need to complete enhanced interview questionnaires to identify close contacts of a case; determine potential sources of infection and potentially instigate wider public health interventions is particularly true for pathogens such as: Shigella; Hepatitis A; E.coli O157; Legionella; Giardia and Listeria.

e.g. Vaccination of close contacts of Hepatitis A cases; Ensuring confirmed cases of Giardiasis receive appropriate antibiotic treatment from their GP; Ensuring confirmed cases working with food or vulnerable people only return to work after satisfying the relevant microbiological clearance requirements; Liaison with other relevant stakeholders to identify contaminated foodstuff on the market.

Contrary to general public perception, most communicable diseases are not necessarily caused from consuming contaminated food; despite the case having traditional 'food poisoning' symptoms. Risk factors are often associated with the consumption of (or exposure to) contaminated water; direct contact with animals and/or their faeces; close contact with an infected person (including sexual contact).

The graph below illustrates the incidence of common pathogens (other than Campylobacter) that have caused illness across SRS between 2018 and 2022.

The table below illustrates the Incidence of the common pathogens (other than Campylobacter) which have caused illness across SRS region in 2023.

	Bridgend	Cardiff	Vale of Glamorgan	Total
Cryptosporidium	30	47	21	98
E. coli non O157	29	39	12	80
E. coli O157	1	4	1	6
Giardia	22	62	10	94
Hepatitis A	1	1	0	2
Hepatitis E	2	5	1	8
Legionella	5	5	3	13
Listeria	0	1	0	1
Salmonella	21	43	24	88
Shigella	2	20	4	26
Total	113	227	76	416

Outbreaks

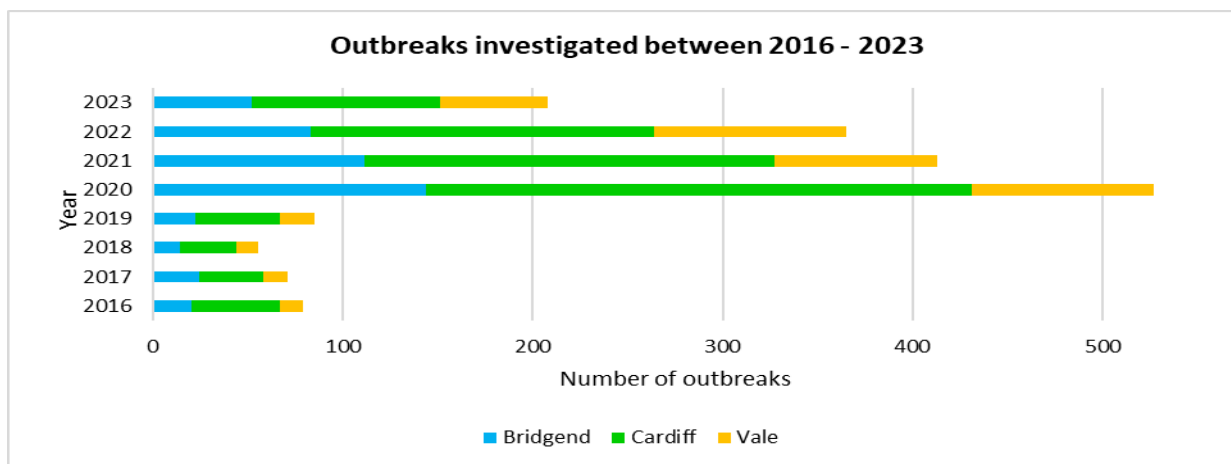
In addition to the investigation of sporadic cases of food poisoning in 2023, a total of 208 outbreaks were investigated by the Communicable Disease Service, compared with 365 in 2022; 413 in 2021;

527 in 2020 and 85 in 2019. Unsurprisingly the main reason for the decline in outbreak numbers over the past 3 years has been the significant reduction in COVID-19 outbreaks.

Just under half of the reported outbreaks were in Cardiff (99, 48%), a quarter were in Bridgend (52, 25%) and just over a quarter were in the Vale of Glamorgan (57, 27%). This distribution of outbreaks across the 3 legacy authorities mirrors what was reported for 2022.

The graph below compares the number and distribution of outbreaks across the SRS region between 2016 and 2023.

Graph: Outbreaks in 2023 across the region



The greatest number of outbreaks were linked to residential care homes (98, 47%), followed by schools (48, 23%) and early years settings (47, 23%). Gastrointestinal illnesses suspected to be Norovirus accounted for 52.5% (109) of all outbreaks; COVID-19 37% (77); confirmed Norovirus 10% (21) and Legionella 0.5% (1). Three quarters of reported outbreaks in residential care homes were due to COVID-19. SRS investigated **8 outbreaks associated with commercial food businesses** throughout 2023, 5 linked to the consumption of raw oysters from different suppliers in England and Wales. Confirmed cases of Norovirus were identified in 7 of the 8 outbreaks.

Further details of projects and health promotion work can be found in the Communicable Disease and Health Promotion Plan 2024/25.

6.1.9 Feed/Food Safety Incidents

There were no food alerts received last year from the Food Standards Agency in relation to food hygiene, however requests were received from the FSA for action to raise awareness of product recalls and to check that businesses had received product recalls, in the following instances:-

- Marinated raw chicken sample found to contain salmonella as part of routine sampling.
- An outbreak of Shig toxin-producing E.coli in strawberries and blueberries.
- A variety of imported food products that contained unauthorised food additives.

There were 2 food standards alerts received together with a number of requests from the FSA.

There were no Feed Alerts during the year.

6.1.10 Liaison with other organisations

Liaison with other organisations remains a constant theme of the work of SRS. The list at 3.8 represents all those organisations that the service liaised with during 2023/24.

6.1.11 Food and Feed Safety Promotion

Promoting a positive food safety culture is undertaken through a variety of channels, many of which are directly linked to providing advice to business. See 6.1.6 above.

6.2 Identification of any variation from the Service Plan

The mechanisms in place to review performance enable remedial action to be put in place should any shortfalls against targets or plans occur during the year. Consideration will be given to the various factors that may contribute to any shortfalls and whether additional resources, re-allocation of staff resources or re-prioritisation of workload is required to resolve any problems. Any issues that may not have been resolved at the end of the year will be included in the Service Plan for the following year.

Performance against the Food and Feed Law Service Plan 2023/24 has been outlined in detail above. It was recognised at the time of plan adoption that there would be difficulties in delivering the full requirements of the Food Law Code of Practice. This was due to insufficient resources and a backlog of inspections that had accumulated. In order to address this, the Food service has invested in the use of contractors during the year, which has resulted in the high risk inspection programme being completed, and excellent progress being made to clear the backlog of new business registration inspections.

In accordance with the requirements of the food law code of practice, E rated premises inspections are able to be completed utilising self assessment questionnaires. This is due to the low risk nature of such premises, examples of which include clothing stores selling confectionary goods such as sweets and chocolates. The purpose of the questionnaire is to determine whether the said low risk food items have further developed and ensure the business would not require re- categorising based on it's practices.

The inspection for the purpose of food hygiene matters will be done as a matter of course with the food standards inspection being added to further enhance the inspection. Any further enforcement matters required for the purpose of food standards matters will be referred to the Trading Standards team for action.

6.3 Areas for improvement

As part of the annual review process, any areas for improvement will be identified and included in the Plan and/or the Service Area Business Plan with such improvement encompassing areas such as :-

- Improvements to working practices;
- New projects or initiatives;
- Greater partnership working;
- Improvements in efficiency and effectiveness;
- Promotion of food issues;
- Greater focus on outcomes.

As a result of a review of the service, the following opportunities for development are identified for 2024/25.

Food Safety

- Continue to implement and enforce the statutory Food Hygiene Rating System at all visits carried out by the Food and Port Health Teams and initiate projects to ensure appropriate display of ratings.
- Review and revise the SRS authorisation procedure to fully reflect the new competency requirements as prescribed by the food standards agency.
- Continue engaging with business and communicating food safety messages.
- Promote the uptake of paid for advice and training by businesses to improve their hygiene ratings.
- Engage with local businesses to promote and secure additional Primary Authority relationships.

Food Standards

- Ensure all unverified premises are contacted and risk assessed as appropriate in readiness for incorporation into a new food standards programme
- Prioritise the development of Food Hygiene officers in undertaking food standards inspections in accordance with new working arrangements.
- Ensure database is up to date and accurate.

Feed Hygiene

- Ensure all unverified premises are contacted and risk assessed as appropriate.
- Prioritise newly registered feed businesses for inspection.
- Increase the number of qualified and/or competent feed officers through training and monitoring to ensure resilience within the Service.

Appendices

- A. [Food Safety Sampling Plan](#)
- B. [Food Standards Sampling Plan](#)
- C. National Feed Enforcement Priorities 2024/25
- D. Corporate Priorities of partner authorities
- E. SRS vision, priorities and outcomes

DRAFT

Appendix A - Food Safety Sampling Plan 2024/25

Food Safety Sampling Plan 2024/25						
Survey	Survey no. if applicable	Timeframe including days	Target Number of premises in total	Number, to be submitted at one time	Analysis required	Team
Welsh Food Microbiological Forum Targeted Survey 2024 Chicken survey		January 24- June 24 Mondays, Tuesdays & Wednesdays	30 Cardiff, 10 Vale and 10 Bridgend	Approx 6 per day	<i>Enumeration:</i> Aerobic colony count, Enterobacteriaceae, Listeria monocytogenes and other Listeria spp., <i>Detection:</i> Listeria monocytogenes and other Listeria spp.,	Commercial
Welsh Food Microbiological Forum Targeted Survey 2024 Microgreen survey		January 24- January 25 Mondays, Tuesdays & Wednesdays	30 Cardiff, 10 Vale and 10 Bridgend	Approx 6 per day	<i>Enumeration:</i> E.coli, Enterobacteriaceae, Presumptive Bacillus cereus Listeria monocytogenes and other Listeria spp., Coagulase positive staphylococcus. <i>Detection:</i> Salmonella	Commercial
Welsh Food Microbiological Forum Targeted Survey 2024 Sandwiches		1 st July 24- 31 st December 24 Mondays, Tuesdays & Wednesdays	30 Cardiff, 10 Vale and 10 Bridgend	Approx 6 per day	<i>Enumeration:</i> Aerobic colony count, Enterobacteriaceae, E. coli, Presumptive Bacillus cereus, Listeria monocytogenes and other Listeria spp., Coagulase positive Staphylococcus. <i>Detection:</i> Salmonella sp, Listeria monocytogenes and other Listeria spp	Commercial
Port Health Waters Shoreside		August -March	6 locations	Approx 6 per day	E. coli, Enterococci, Coliforms, Aerobic Colony Count	Commercial

Appendix B - Food Standards Sampling Plan 2024-25

Q	Food Matrix	Analysis	Target Number	Cost per sample (excl vat)	Total Cost (excl vat)
1 - 4	Complaint samples Follow up formal sampling Referrals from Food Safety Team	Allergens/Speciation/Labelling Allergens/Speciation/Labelling Allergens/Speciation/Labelling	Variable	Variable	£20,000 (4 x £5,000)
2	School meals	Allergens	20	FSA Funded	TBC
3	Glamorgan Group TBC	Spirit substitution (Vodka, Gin) ABV/illegal contaminants	20	FSA Funded	TBC
4	OPSON - FSA funded project TBC	To be confirmed	10	FSA funded	TBC
Total cost sampling					£20,000

Appendix C – National Feed Enforcement Priorities 2024/25



National Enforcement Priorities for England and Wales

**Feed law enforcement and food
hygiene law enforcement at primary
production**

April 2024

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[Priority 2: Effective monitoring of feed on farms](#)

[Priority 3: Effective monitoring of storage arrangements at feed premises](#)

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[Priority 4: Verification of the accuracy of feed labelling](#)

[Priority 5: Effective monitoring of consignments of feed originating from non-EU countries, at points of entry](#)

[Food Hygiene Primary Production Priorities](#)

[Priority 6: Effective identification, registration and inspection of food businesses producing higher-risk fresh produce operating at the level of primary production](#)

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[Guidance](#)

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Summary

This publication aims to guide local authority (LA) enforcement officers in England and Wales on the areas to focus on during the delivery of official controls for:

- feed (at all stages of production, processing, storage, transportation and distribution including import and the primary production of feed) and
- food hygiene at primary production

Legal status

The National Enforcement Priorities (NEPs) should be considered alongside the [Feed Law Code of Practice and Food Law Code of Practice and their respective practice guidance](#). Links to legislation and guidance to support LAs to embed these priorities within their annual plan of official feed and food controls can be found within this document.

The following priorities are intended to support LAs to focus their official controls which should be conducted at the frequency set out in the Feed and Food Law Codes of Practice.

Who is this publication for?

This document is primarily intended for LA enforcement officers. However, it will also be of interest to all food and feed business operators at the level of primary production, the Food Standards Agency (FSA), approved industry assurance schemes and private sector assurance bodies. Please note that some links in this document are only available to LA enforcement officers.

Review date

This document will be reviewed before March 2025.

Main points

This document sets out the FSA's:

- National Enforcement Priorities for England and Wales, in respect of animal feed at all levels of production and/or supply and food hygiene at the level of primary production
- expectations of LAs to implement, where relevant, these priorities in the course of delivering their intervention programme

Introduction

The objectives of the priorities are to:

- drive an intelligence led approach to official controls
- maintain a level playing field for compliant food and feed businesses, which is in the interests of industry as a whole and supports trade in feed and food
- reduce unnecessary burdens by focusing LA activity on areas of potential non-compliance that present a higher-risk to food and feed safety
- drive up the quality and consistency of official controls
- realise [the FSA Strategy of 'Food you can trust'](#)

The priorities:

- have been informed by intelligence from non-compliance data and feed incidents
- have been developed in consultation with feed industry and LA representatives; [National Trading Standards \(NTS\)](#); the National Agriculture Panel (NAP) and National Animal Feed at Ports Panel (NAFPP) members

The gathering and exchange of information, data and intelligence between competent authorities, central government departments and industry, including FSA approved assurance schemes, is a key element to an effective risk-based system of official feed and food controls.

LAs are expected to ensure effective information sharing, communication and exchange of intelligence in accordance with the [Feed and Food Law Codes of Practice and Practice Guidance](#). The proactive use of recognised trading standards national intelligence databases (such as [IDB](#) and Memex) is considered key for the recording and sharing of intelligence. LAs should share all intelligence they become aware of in relation to known or suspected cases of food and/or feed fraud, including historic cases, with the [National Food Crime Unit \(NFCU\)](#).

National Priorities 2024/25

The priorities are not listed in any particular order; the numbering is for reference only.

Animal Feed Priorities

- Priority 1:** Verification of effective implementation and maintenance of feed safety management systems
- a:** Verification at all feed business types
 - b:** Verification at co-producers and businesses supplying former foodstuffs
- Priority 2:** Effective monitoring of feed on farms
- a:** Examination of former foodstuffs / co-products being used for feed on farms
 - b:** Effective monitoring of pest control procedures
 - c:** On-farm record keeping requirements and documented procedures
- Priority 3:** Effective monitoring of storage arrangements at feed premises
- Priority 4:** Verification of feed labelling
- Priority 5:** Effective monitoring of consignments of feed originating from non-EU countries, at points of entry

Food Hygiene at Primary Production Priorities

- Priority 6:** Effective identification, registration and inspection of food businesses producing higher-risk, fresh produce operating at the level of primary production

Further information on each priority is provided in the sections below.

Animal Feed Priorities

Priority 1: Verification of effective implementation and maintenance of feed safety management systems

LAs are expected to give priority to verifying feed safety management systems including permanent written procedures based on Hazard Analysis and Critical Control Point (HACCP) principles. This includes ensuring Feed Business Operators (FeBOs) understand legal requirements, are implementing, maintaining and reviewing, as appropriate, their feed safety management systems and HACCP plans, having regard to the nature, size and scale of the business. Where a business has a [Primary Authority](#) relationship, verification of compliance must take account of any Primary Authority assured advice issued and any active inspection plan.

1a: Verification at all feed business types

This should include a focus on the following:

- a) identification of hazards, ensuring all steps in the process have been considered and any grouping of steps (e.g. consideration of individual ingredients) is appropriate and not done in such a way that hazards are overlooked or risk-assessed incorrectly
- b) where a hazard is not adequately controlled by a prerequisite procedure, Critical Control Points (CCPs) are correctly identified, properly defined and effectively controlled in a timely manner. (NB. In relation to raw pet food, CCPs should include safe sourcing)
- c) establishing that appropriate systems are in place to minimise cross-contamination between batches of feed, particularly in respect of those containing coccidiostats, veterinary medicines or [feed additives](#) with maximum permitted levels for any target species
- d) appropriate sampling programmes at the feed business are in place to verify compliance with maximum levels of undesirable substances in feed materials and feed additives. Checks should include an examination of analytical results and consideration of whether appropriate action has been taken
- e) scrutinising traceability systems to ensure that product
 - i) can effectively be traced in the event of a product recall or withdrawal
 - ii) not intended for feed use is not diverted into the feed/food chain

1b: Verification at co-producers and businesses supplying former foodstuffs

Every year in the UK, around [650,000 tonnes of former foodstuffs are processed as animal feed, worth £110 million](#). Where former foodstuffs intended for use in feed are delivered with packaging, it must undergo further treatment to remove the packaging before being used as feed. This process is often carried out at a specialist former foodstuffs processing premises.

NTS have produced a [toolkit](#) to support LA officers in relation to businesses supplying former foodstuffs and co-products.

Priority should be given to co-producers and independent retailers supplying former foodstuffs who may be supplying direct to farm or to intermediary collectors delivering to processing facilities.

In addition to the points covered by Priority 1a, this should include a focus on the following:

- a) the identification of control points to ensure that material is suitable for use as animal feed, for example feed for farmed animals does not include items such as meat, fish and shellfish (including products containing them or that have been in contact with them)
- b) appropriate segregation of material not intended for use as feed
- c) the existence of an appropriate recorded training programme for staff in charge of dealing with former foodstuffs
- d) material is only supplied to a registered feed business
- e) suppliers and hauliers in the chain of processing former foodstuffs to feed and co-products are all registered as feed businesses

Priority 2: Effective monitoring of feed on farms

2a: Examination of former foodstuffs / co-products being used for feed on farms

LAs are expected to examine, where applicable that any former foodstuff or co-product being used for feed on farms:

- a) is not contaminated
- b) does not contain prohibited substances as listed in Annex III of [Retained EU Regulation 767/2009](#) on the placing on the market and use of feed
- c) is being sourced from a registered feed business establishment

2b: Effective monitoring of pest control procedures

Monitoring of measures and record keeping to demonstrate that as far as possible pests are prevented from causing hazardous contamination of feed on farm.

2c: On-farm record keeping requirements and documented procedures

Compliance with the record keeping requirements detailed in Annexes I and II of [Retained EU Regulation 183/2005](#) laying down requirements for feed hygiene, should be examined on farms, including:

Annex I

- a) any use of plant protection products and biocides;
- b) use of genetically modified seeds;
- c) any occurrence of diseases that may affect the safety of primary products;
- d) the results of any analyses carried out on samples taken from primary products or other samples taken for diagnostic purposes that have importance for feed safety;
- e) the source and quantity of each input of feed and the destination and quantity for each output of feed.

and, in addition, for farms subject to the requirements of Annex II (R10):

- a) traceability records in relation to purchased feeds, with a particular focus on feed additives and/or premixtures
- b) documented procedures based on the principles of HACCP

Priority 3: Effective monitoring of storage arrangements at feed premises

At all stages of the feed chain suitable storage and product identification is necessary to prevent the introduction of hazards to feed.

LAs are expected to give priority to:

- a) ensure separation of feed materials and additives from finished feed
- b) feed kept separate from any non feed materials such as plant protection products, cleaning chemicals and waste etc. that could contaminate the feed
- c) that facilities are secure from external hazards e.g. rain, sewage and other sources of contamination
- d) the suitability and cleanliness of containers for feed, where used
- e) ensure feed in storage is readily identifiable

Priority 4: Verification of feed labelling

Information on feed labels is essential to enable FeBOs, throughout the feed chain, to make appropriate use of material used in the manufacture of feed or for direct feeding and for traceability in the event of a product recall or withdrawal.

LAs are expected to give priority to:

- a) verifying additives present in feed are authorised (included in [the register of feed additive authorisations for Great Britain](#)) in line with [Retained EU Regulation 1831/2003](#) on additives for use in animal nutrition, and are supplied by appropriately approved or registered feed businesses
- b) verifying the accuracy of claims as set out in Article 13 of [Retained EU Regulation 767/2009](#) on the placing on the market and use of feed. NTS have produced [guidance for LAs on internet-based feed sales and websites](#) and [guidance for LAs on claims made about animal feed \(including medicinal claims\)](#)
- c) ensuring the traceability information is sufficient and accurate to identify the supplier of the feed and enable confirmation that the feed supplied matches the description purchased

Priority 5: Effective monitoring of consignments of feed originating from non-EU countries, at points of entry

Imported feed makes up a significant proportion of feed used in the UK. To support a consistent and risk-based approach to monitoring imports LAs are expected to give priority to monitoring irregular consignments of feed originating from non-EU countries (including feed that has transited through the EU), in consideration of:

- a) [NTS guidance](#) on consistency and prioritisation of the delivery of official controls at points of entry
- b) sampling consignments which have not been sampled recently or have not been seen before at the point of entry or where there is reason to believe they might fail to comply with legal requirements
- c) the Risk Likelihood Dashboard for [\(England\)](#) and [\(Wales\)](#)

Food Hygiene Primary Production Priorities

Priority 6: Effective identification, registration and inspection of food businesses producing higher-risk fresh produce operating at the level of primary production

LAs are expected to give priority to the identification, registration and inspection of food businesses producing higher-risk fresh produce operating at the level of primary production. Some examples are given to illustrate each category, however these are not intended to be an exhaustive list and LAs are advised to use their professional judgement.

These are:

- a) producers of soft fruits and berries, for example raspberries, blackberries, mulberries, loganberries and strawberries, for which a thorough wash post-harvest will be difficult to achieve without damaging the produce

- b) producers of leafy greens and salad fruit and vegetables
 - i) normally eaten raw, for example lettuce, micro leaves, baby leaves, watercress, spinach, herbs and cucumbers
 - ii) that have a short seed to harvest time meaning that they are likely to be harvested within two (2) weeks of last irrigation. If irrigation water is contaminated, this contamination will not have had time to dissipate in short harvest crops

- c) producers of bulb and root vegetables, or vegetables with no protective skin, that are commonly consumed raw, for example salad onions, radishes and celery

Guidance

Animal Feed

Food Standards Agency (FSA)

[Animal feed legislation](#)

[Removal of food grade packaging material in surplus food into the feed chain](#)

[Guidance on HACCP-related requirements for farmers](#)

National Trading Standards (NTS)

[Co-producers and suppliers of surplus food](#)

Advisory Committee on Animal Feedingsuffs (ACAF)

[Review of on-farm feeding practices](#) - updated recommendations on identifying hazards and minimising risks

Animal and Plant Health Agency (APHA)

[How food businesses must dispose of food and former foodstuffs](#)

Department for Environment, Food & Rural Affairs (Defra)

[Code of Practice for the Control of Salmonella](#) during the Production, Storage and Transport of Compound Feeds, Premixtures, Feed Materials and Feed Additives

British Standards Institution (BSI)

[Prerequisite programmes for food safety in the manufacture of food and feed for animals](#)

Food and Agriculture Organization of the United Nations (FAO) and International Feed Industry Federation (IFIF)

[Good Practices for the Feed Sector](#) implementing the [Codex Alimentarius Standards](#) Code of Practice on good animal feeding

European Commission

[Guides to Good Practice](#) developed in accordance with Article 22 of [Retained EU Regulation 183/2005](#) laying down requirements for feed hygiene

- [Community guide to good practice for the EU industrial compound feed and premixtures manufacturing sector for food-producing animals](#) (The European Feed Manufacturers' Federation - FEFAC)

- [Community guide to good practice for feed additive and premixture operators](#) (The Quality and Safety System for Speciality Feed Ingredients -FAMI-QS)
- [Guide to good practice for the manufacture of safe pet foods](#) (The European Pet Food Industry - FEDIAF)
- [European Guide to good practice for the industrial manufacture of safe feed materials](#)
 - [The manufacturing of safe feed materials from starch processing](#)
 - [The manufacturing of safe feed materials from oilseed crushing and vegetable oil refining](#)
 - [The manufacturing of safe feed materials from biodiesel processing](#)
 - [Salmonella auditor checklist and factsheet](#)
- [European Guide to Good Hygiene Practices for the collection, storage, trading and transport of cereals, oilseeds, protein crops, other plant products and products derived thereof](#)

[Guides to Good Practice](#) developed in accordance with Article 26 of [Retained EU Regulation 767/2009](#) on the placing on the market and use of feed

- [EU Code of good labelling practice for compound feed for food producing animals \(FEFAC\)](#)
- [Code of Good Labelling Practice for Pet Food \(FEDIAF\)](#)

Industry Standards

Agricultural Industries Confederation (AIC)

[Feed Material Assurance Scheme Standards](#) (FEMAS)

[Trade Assurance Scheme for Combinable Crops](#) (TASCC)

[Universal Feed Assurance Scheme](#) (UFAS)

[BRC Voluntary Module 9](#) – Management of Food Materials for Animal Feed

Red Tractor

[Assured Food Standards](#)

Farm Assured Welsh Livestock

[Welsh Lamb and Beef Producers Ltd](#)

Imported Feed

Food Standards Agency (FSA)

[Effective Import Controls for food and feed not of animal origin at smaller seaports and airports](#)

Association of Chief Trading Standards Officers (ACTSO)

[Sharing information and intelligence to support delivery of imported feed controls](#)

Animal and Plant Health Agency (APHA)

[UK border control posts: animal and animal product imports](#)

Food Hygiene Primary Production

Food Standards Agency (FSA)

[Primary production food hygiene inspection guidance](#)

Links to information sources that may assist the identification of primary producers in your area

[Defra – Structure of the agriculture industry in England and the UK at June](#)

[Defra – Agriculture in the UK](#)

[Environment Agency – map of water abstraction licenses](#)

[Agriculture and horticulture development board \(AHDB\)](#)

[British growers association](#)

[Pick your own farms](#)

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Appendix D – Corporate Priorities and outcomes of partner local authorities

Corporate priorities and outcomes of partner Councils

Bridgend County Borough Council

Priorities

Outcomes/Aims



- A County Borough where we protect our most vulnerable
 - A County Borough with fair work, skilled, high-quality jobs and thriving towns
 - A County Borough with thriving valleys communities
 - A County Borough where we help people meet their potential
 - A County Borough where people feel valued, heard and part of their community
 - A County Borough where people feel valued, heard and part of their community
 - A County Borough where we support people to live healthy and happy lives.
- Protect our most vulnerable
 - Fair work, skilled , jobs and thriving towns
 - Creating thriving valleys communities
 - Helping people meet their potential
 - Responding to the climate and nature emergency
 - Making people feel valued, heard and part of their community
 - Supporting people to be healthy and happy.

City of Cardiff Council

Priorities

Outcomes/Aims



- Cardiff is a great place to grow up
 - Cardiff is a great place to grow older
 - Supporting people out of poverty
 - Safe, confident and empowered communities
 - A Capital City that works for Wales
 - One Planet Cardiff
 - Modernising and integrating our public services
- Cardiff is a great place to grow up
 - Cardiff is a great place to grow older
 - Supporting people out of poverty
 - Safe, confident and empowered communities
 - A Capital City that works for Wales
 - One Planet Cardiff
 - Modernising and integrating our public services

Vale of Glamorgan Council

Priorities

Outcomes/Aims




- To work with and for our communities
 - To support learning, employment and sustainable economic growth
 - To support people at home and in their community
 - To respect, enhance and enjoy our environment
- A Vale that is:
- Inclusive and Safe
 - Environmentally Responsible and Prosperous
 - Aspirational and Culturally Vibrant
 - Active and Healthy


Appendix E


SRS vision, priorities and outcomes


To be the leading provider of regulatory services that safeguard the health, safety and economic wellbeing of the region


Improving health and wellbeing


 The food chain is safe and free from risks


 Risks in the workplace are managed properly

 Noise and air emissions are controlled


 A safe trading environment is maintained


 Licensed premises operate responsibly

 The quality of private rented property is improved


 Infectious disease is controlled and prevented

Protecting the environment


 The environment is protected from harmful emissions to land, air and water


 People will use energy efficient buildings and products


 Communities are protected from nuisance and are safer


 Animals are treated humanely


Safeguarding the vulnerable

 Children are protected from harmful substances and products

 Older and vulnerable people are protected from rogue traders and scams


 Illegal money lending activities are prevented


 Taxi provision is safe and fair


 Vulnerable people are not subject to exploitation, slavery or trafficking

Supporting the local economy


 A fair trading environment is maintained


 Informed and confident consumers


 Improved business practices and operation


 Accessible services responsive to business needs

Maximising the use of resources

 SRS operates effectively and efficiently across all 3 areas

 Public and stakeholders can access our services

 Income generation underpins sustainable service delivery

 Staff are effective in their roles

Delivering our priorities

Understanding the needs of our customers and placing their needs at the heart of the services we deliver;
 Developing a flexible and agile workforce that is responsive to change and that have the right skills to deliver quality services that meet the needs of our customers and local communities;
 Maximising internal efficiencies to enhance service quality;
 Exploring opportunities to innovate and develop;
 Working together to future proof the service to meet financial challenges and future demands.

