

Report on the Audit of Official Controls on Feed of Non-Animal Origin (FNAO) and Feed Establishments, including Primary Producers

Cambridgeshire County Council
6 -7 August 2013



Foreword

Audits of local authorities' feed and food law enforcement services are part of the Food Standards Agency's arrangements to improve consumer protection and confidence in relation to food and feed. These arrangements recognise that the enforcement of UK food and feed law relating to food safety, hygiene, composition, labelling, imported food and feeding stuffs is largely the responsibility of local authorities. These local authority regulatory functions are principally delivered through their Environmental Health and Trading Standards Services. The Agency's website contains enforcement activity data for all UK local authorities and can be found at:

www.food.gov.uk/enforcement/auditandmonitoring.

This programme of focused audits in England and Wales has been specifically developed to address two of the priorities identified in the Food Standard Agency's Strategy for 2010-2015 in meeting the outcomes that feed meets the legislative requirements for animal consumption and is safe to enter the human food chain and that regulation is effective, risk-based and proportionate. The strategic priority is to ensure risk-based, targeted checks at inland feed establishments and effective local authority monitoring throughout the feed chain. The audits will also provide an opportunity for the Agency to establish the level of improvement in the delivery of official controls being implemented by local authorities (LAs) following the FVO Mission to the United Kingdom on animal feed controls which took place from 16-26 June 2009 and the subsequent follow-up visit to check on progress in November 2011. The report entitled 'The Implementation of Measures Concerning Official Controls on Feed Legislation' is available from the Europa website at:

http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_id=2335.

Agency audits assess local authorities' conformance against the Feed and Food Law Enforcement Standard ("The Standard"), which was published by the Agency as part of the Framework Agreement on Official Feed and Food Controls by Local Authorities and is available on the Agency's website at: www.food.gov.uk/enforcement/auditandmonitoring.

The programme examined local authority (LA) systems and procedures for control of feed at inland authorities, in 10 geographically representative LAs in England. The audits were confined to feed of non-animal origin (FNAO).

It should be acknowledged that there will be considerable diversity in the way and manner in which local authorities may provide their feed enforcement services reflecting local needs and priorities.

The main aim of the audit scheme is to maintain and improve consumer protection and confidence by ensuring that local authorities are providing an effective feed law enforcement service. The scheme also provides the opportunity to identify and disseminate good practice and provide information to inform Agency policy on feeding stuffs. Parallel local

authority audit schemes are implemented by the Agency's offices in all devolved countries comprising the UK.

For assistance, a glossary of technical terms used within the audit report can be found at Annex C.

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1.0 Introduction

- 1.1 This report records the results of an audit at Cambridgeshire County Council with regard to feed law enforcement, under relevant headings of the Food Standards Agency Feed and Food Law Enforcement Standard. The audit focused on the Authority's arrangements for inland controls of feed of non-animal origin. This report has been made publicly available on the Agency's website at: www.food.gov.uk/enforcement/auditandmonitoring/auditreports
Hard copies are available from the Food Standards Agency's Operations Assurance Division at Aviation House, 125 Kingsway, London WC2B 6NH, Tel: 020 7276 8428.

Reason for the Audit

- 1.2 The power to set standards, monitor and audit local authority feed and food law enforcement services was conferred on the Food Standards Agency by the Food Standards Act 1999 and the Official Feed and Food Controls (England) Regulations 2009. This audit of Cambridgeshire County Council was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme.
- 1.3 Regulation (EC) No. 882/2004 on official controls performed to ensure the verification of compliance with feed and food law includes a requirement for competent authorities to carry out internal audits or to have external audits carried out. The purpose of these audits is to verify whether official controls relating to feed and food law are effectively implemented. To fulfil this requirement, the Food Standards Agency, as the central competent authority for feed and food law in the UK has established external audit arrangements. In developing these, the Agency has taken account of the European Commission guidance on how such audits should be conducted.¹
- 1.4 The Authority was included in the Food Standards Agency's programme of audits of local authority feed law enforcement services, as it had not been audited in the past by the Agency and was representative of a geographical mix of 10 feed law enforcement LAs selected across England.

Scope of the Audit

- 1.5 The audit examined Cambridgeshire County Council's systems and procedures for the control of feed of non-animal origin (FNAO).
- 1.6 The audit scope included the assessment of local arrangements for service planning, delivery and review, provision and adequacy of officer

¹ Commission Decision of 29 September 2006 setting out the guidelines laying down criteria for the conduct of audits under Regulation (EC) No. 882/2004 of the European Parliament and of the Council on official controls to verify compliance with feed and food law, animal health and animal welfare rules (2006/677/EC)

training, authorisations, implementation and effectiveness of feed control activities, including inspection, sampling and enforcement. Maintenance and management of appropriate records in relation to feed and internal service monitoring arrangements were also covered.

- 1.7 The on-site element of the audit took place at the Authority's offices at Sackville House, Sackville Way, Great Cambourne, Cambridgeshire on 6-7 August 2013. The audit included a reality check at a feed establishment to assess the effectiveness of official controls implemented by the Service and more specifically, the checks carried out by the Service's officers to verify compliance with feed law requirements.

Background

- 1.8 Cambridgeshire County Council lies in the east of England, with a population estimated to be around 612,000. The area includes the city of Cambridge which features as the county town, and also the towns of Huntingdon and Ely. The County Council administrative area covers that of five district councils. Whilst the County is predominantly rural, including large areas of fenland, the economy encompasses relatively high levels of scientific research, and significant employment within the education, retail and health sectors.
- 1.9 Feed law enforcement was part of the responsibilities of Supporting Business and Communities, which encompassed Trading Standards, Cultural Services, Parking Services and the Waste Strategy Partnership. These services were within the Infrastructure Management and Operations Service Directorate.
- 1.10 The profile of Cambridgeshire County Council's feed businesses at the 31 March 2013 was as follows:

Type of Feed Premises	Number
Arable Farms	845
Livestock Farms	897
Manufacturers	19
Food businesses selling co-products/surplus food	54
Importers	2
Distributors/Transporters	73
Stores	16
Retailers	70
Total Number of Feed Premises	1,976

2.0 Executive Summary

2.1 Cambridgeshire County Council was selected for audit as it had not been previously audited by the Agency. Auditors acknowledged that due to financial pressures the County Council had recently reorganised and the Head of Service for Supporting Business and Communities had recently left the Authority for a new post, and the current Head of Service was also on extended long term leave. Over several years there had been a significant reduction in the number of Trading Standards staff responsible for the delivery of feed law enforcement.

2.2 Strength:

Provision of advice: It was clear that the Authority placed importance in providing clear and helpful advice to users of its Service including feed businesses, other local authorities and consumers. There was evidence of thorough advice being provided in response to service requests and referrals regarding animal feed, advice on compliance following the receipt of adverse feed sample results, and the Service had also been named “Local Authority of the Year” in the 2013 Primary Authority Awards.

2.3 Key areas for improvement:

Service planning: The Authority had developed a Food and Feed Plan for 2013/14 which was supplemented by other documents and plans. However the Authority needs to review the Service Plan as the information provided was insufficient to meet the requirements in the Service Planning Guidance in the Framework Agreement. In particular the plan should include, a realistic comparison of the resources required to deliver a full programme of interventions against the resources available. An annual review should also be carried out and any variations identified. The plan should be formally approved by the relevant Member forum, Member, or senior officer.

Officer authorisations: Authorisation arrangements required review to ensure that officers have appropriately defined levels of authorisation in accordance with their individual qualifications, experience, training and competencies and to ensure they contained all relevant current feed legislation.

Feed establishment interventions programme: The programme of planned inspections was limited to high risk premises and utilised a hybrid risk rating system developed by the Authority. All feeding stuffs premises should be both risk rated and inspected at appropriate frequencies, as specified in the Feed Law Enforcement Code of Practice.

Internal monitoring: The Authority was performing some qualitative and quantitative monitoring of feed law enforcement activities, but needs to confirm conformance across all feed law enforcement activities with the requirements of the Feed Law Enforcement Code of

Practice, centrally issued guidance, and the Standard in the Framework Agreement.

Documented procedures: A number of key procedures required development to provide relevant operational guidance for officers, including procedures for feed premises inspection and the authorisation of officers.

3.0 Audit Findings

3.1 Organisations and Management

Strategic Framework, Policy and Service Planning

3.1.1 The Authority had several documents which set out the strategic framework, policy and service planning arrangements for 2013/14. These included:

- Cambridgeshire Business Plan
- Infrastructure Management and Operations Directorate Service Plan
- Supporting Business and Community Service Plan
- Food and Feed Plan
- Compliance Team Action Plan
- Feed Inspection Plan
- Feed Sampling Programme.

3.1.2 The Directorate Overview and Vision set out a strategic focus 'on operating, maintaining and improving services, from looking after our infrastructure to helping our citizens and business thrive'. One key priority was to implement efficiency savings and to identify how further savings could be achieved. The Service Plan for Supporting Business and Communities detailed its two key functions as supporting businesses and supporting communities, alongside priorities, service delivery principles, and future challenges and opportunities. A financial overview highlighted the success of the Authority in attracting external funding from the Food Standards Agency for food and feed activity.

3.1.3 The Food and Feed Plan identified that constraints on resources had limited programmed inspections at high risk establishments, with medium and low risk interventions being subject to alternative enforcement methods such as intelligence led interventions and self assessment. The Food and Feed Plan had been approved by the Head of Service, however there was no documented evidence of approval. The Feed Inspection Plan listed types of feed establishments with a target of 109 inspections and the action plan for the Compliance Team listed six areas of feed law enforcement activity for the year including sampling, inspection and projects.

3.1.4 The Food and Feed Plan required review and development to ensure it met the requirements of the Service Planning Guidance in the Framework Agreement, and also to inform Members or Senior Officers of the feed law enforcement demands on the Service. The Plan needed to include priorities for the feed service, a breakdown of a risk-based inspection programme, and a realistic comparison of the resources required to deliver the feed law enforcement service against the resources available to the Authority based on the full

range of statutory duties placed upon it. It needed to take account of official guidance and the National Enforcement Priorities for feed authorities. A review of the Service Plan should be conducted on an annual basis and any variations from the Plan identified.

Recommendations

3.1.5 The Authority should:

- (i) Further develop the Food and Feed Plan in accordance with the Service Planning Guidance in the Framework Agreement, to include all feed demands on the Service, including feed premises profiles and a feed interventions/inspections programme, together with a comparison of the resources required to carry out the full range of statutory feed law enforcement activities against the resources available to the Service.
[The Standard – 3.1]
- (ii) Carry out an annual performance review based on the service delivery plan and ensure that any variances identified are addressed in subsequent years' service planning.
[The Standard – 3.2 and 3.3]

Documented Policies and Procedures

- 3.1.6 The Authority had developed and operated an 'electronic hub' which contained procedures, flow charts, forms and information across a range of enforcement activities including feed law. Each of the procedures had an allocated owner who was responsible for appropriate reviews and updates. The system and resources were accessible to all staff and provided a source of guidance for officers and at the same time helped maintain consistency. Whilst the system encompassed some aspects of feed law enforcement, it was limited and key procedures were omitted, including feed premises inspection, internal monitoring, database control, authorisation of officers, feed incidents procedure and some enforcement procedures.
- 3.1.7 Appropriate documented procedures should be developed and implemented for feed law enforcement service, in accordance with Article 8 of Regulation (EC) No. 882/2004, the Feed Law Enforcement Code of Practice (FLECP) and the Standard in the Framework Agreement.

Recommendation

3.1.8 The Authority should:

Further develop the existing procedures and document control system to include the full range of procedures in accordance with the Feed Law Enforcement Code of Practice and official guidance. [The Standard – 4.2]

Officer Authorisations

- 3.1.9 Officers were authorised at one of three levels within the Service dependent upon their qualifications and competencies. However, the Authority had still to develop a documented procedure for the authorisation of officers for feed law enforcement. In addition, authorisation records did not fully provide details of competencies and assessments. The Authority acknowledged that there was a previous system that could be re-introduced to ensure that the necessary details were appropriately recorded.
- 3.1.10 The Authority had provided the Agency with details of the Lead Officer for feed who was appropriately qualified and experienced. Authorisations required review to ensure they contained all relevant feed legislation and clearly defined limits of the individual officers' authorisation.
- 3.1.11 Officer training needs were identified as part of on-going performance reviews. Training records which were retained centrally were found to be up to date and easily accessible. Records demonstrated that good provision had been made for a broad range of training and that feed law enforcement officers had completed the 10 hours of continuing professional development (CPD) training in accordance with the requirements of the FLECP.

Recommendations

3.1.12 The Authority should:

- (i) Set up, maintain and implement a documented procedure for the authorisation of officers based on their competence and in accordance with the Feed Law Enforcement Code of Practice.
[The Standard - 5.1]
- (ii) Review current authorisations to ensure that all officers are authorised to the appropriate level under relevant legislation, in line with their individual qualifications, training, experience and competencies.
[The Standard – 5.3]

Facilities and Equipment

- 3.1.13 Auditors confirmed that the Service had suitable equipment available for sampling a range of feed products.
- 3.1.14 The Authority had an electronic database for the recording of feed law enforcement activities, which was capable of providing information necessary for official returns. However, the feed law inspections programme was primarily managed and implemented through a manual system. This was because the Authority had developed its own hybrid risk assessment scheme for feed premises, which was incompatible with the computerised database system. Feed returns to the Agency therefore required both manual and computerised configuration and data entry.
- 3.1.15 A range of checks were carried out by business support staff to ensure the accuracy of database and this was supplemented by training sessions at team meetings. However there were no documented procedures in relation to data accuracy checks.
- 3.1.16 Due to the lack of a fully computerised system for feed premises it was not possible for the Authority to produce suitable reports for auditors to accurately establish the levels of feed law enforcement activity, or confirm the accuracy of the database. However, database checks carried out as part of the audit on a random selection of six feed businesses from a commercial directory confirmed that the premises were present on the database and appropriately registered.
- 3.1.17 Auditors were informed that the Authority was introducing the National Trading Standards Board Risk Assessment Scheme for all premises, including feed. Implementation was scheduled to start later in the month and arrangements had been made to reconfigure the database

system, which officers anticipated would result in the full computerisation of the feed inspection programme.

Recommendation

3.1.18 The Authority should:

Develop, maintain and implement a documented procedure to ensure that the feed premises database is accurate, reliable and up to date and to ensure that accurate information on feed law enforcement activity is reported in official returns to the Agency. [The Standard – 11.2]

Liaison with Other Organisations

3.1.19 Effective animal feed liaison arrangements had been established with central government and local enforcement bodies across the region. The Authority was actively involved in the East of England Trading Standards Association and regularly attended meetings of the Agriculture Focus Group which included representatives of the Animal Health and Veterinary Laboratories Agency, the Veterinary Medicines Directorate and the Agency. Joint inspections were carried out at relevant establishments as necessary in line with the current national Memorandum of Understanding.

3.2 Feed Control Activities

Feed Establishments Interventions and Inspections

- 3.2.1 The Authority had not developed a documented procedure for the inspection of feed premises. The Service advised that both announced and unannounced inspections were carried out taking into account the compliance history of the establishment, the need to ensure appropriate personnel were present on inspection, and logistical considerations with regard to the geographical size of the district.
- 3.2.2 The Authority's undocumented hybrid risk rating system took into account all sources of intelligence and earned recognition, however it was not in accordance with the FLECP. The transition to the National Trading Standards Board Risk Assessment Scheme would replace the Authority's rating system and would change the feed premises risk rating profile and inspection demands upon the Service.
- 3.2.3 The Food and Feed Plan stated that the resources available for feed law enforcement activities did not allow for a full programme of inspections as required by the FLECP. Feed premises inspections were to be targeted using the National Enforcement Priorities and would include:
- visits to all premises deemed by the Service to be high risk
 - all feed manufacturing facilities
 - inspections during sampling visits
 - inspections of new businesses.
- 3.2.4 Auditors were provided with a list of types of premises to be inspected which totalled 109. Medium and low risk inspections were not programmed for inspection and would be dealt with through alternative intelligence led enforcement methods.
- 3.2.5 Auditors were advised that high risk premises were inspected on a yearly basis although the Authority varied the date of inspections to take into account seasonal factors at premises. This could not be confirmed due to the difficulties in producing database reports.
- 3.2.6 Inspection records were found to be variable, in that the Authority had used the Agency's standard template aides-memoire when carrying out grant funded feed work, but in other cases had recorded inspections on a variety of different forms. There was also variation in the level of detail recorded on inspection forms between individual officers.
- 3.2.7 Comprehensive records are essential for informing enforcement decisions, providing information for future inspections, and to provide the foundation of internal monitoring activities. The benefit of the

consistent use of an inspection aide-memoire/report form was discussed and it was agreed the Authority would review its current approach with a view to using a single report form containing appropriate information based on the Agency's templates.

Recommendations

3.2.8 The Authority should:

- (i) Ensure that feeding stuffs premises inspections are both risk rated and carried out at appropriate frequencies as specified by the Feed Law Enforcement Code of Practice, giving priority to higher risk feed establishments. [The Standard - 7.1]
- (ii) Set up, maintain and implement documented procedures for the range of interventions/inspections carried out. [The Standard - 7.4]
- (iii) Review and consolidate inspection aides-memoire and ensure that all observations and/or data obtained in the course of an inspection are noted in sufficient detail to provide an adequate record of the assessment and determination of business compliance with relevant feed legislation. [The Standard - 16.1]

Verification Visit to a Feed Premises

3.2.9 During the audit, a verification visit was undertaken to a feeding stuffs manufacturer with an officer from the Authority, who had carried out the last feed inspection of the premises. The main objective of the visit was to assess the effectiveness of the Authority's assessment of feed business compliance with feed law requirements. The officer was clearly familiar with the operations carried out at the establishment, able to demonstrate extensive feed law enforcement knowledge and had effectively assessed compliance with feed law requirements.

Feed Inspection and Sampling

3.2.10 The Authority had a documented procedure for feed sampling and had produced a feed sampling programme which gave due consideration to the National Enforcement Priorities. The Authority had successfully applied for a sampling grant from the Food Standards Agency for 2012/13 and had applied for further grant funding for 2013/14.

3.2.11 Examination of three records of feed sampling activities confirmed that samples had been taken by a suitably authorised officer in accordance with the sampling programme and that unsatisfactory sampling results had been dealt with effectively in accordance with the FLECP. Appropriate follow-up action had been taken and feed business operators had been advised of the outcomes.

Enforcement

3.2.12 The Authority had adopted a generic enforcement policy which had been appropriately approved by Members. The policy did not make any specific reference to feed law enforcement options, but it had been developed in accordance with centrally issued guidance and it confirmed that the Authority was committed to the aims of the Enforcement Concordat. It would be useful to update the policy to include reference to the Authority's obligations under the Regulatory Enforcement and Sanctions Act 2008 in respect of Primary Authority Partnerships.

3.2.13 Whilst the Authority had developed a number of useful generic process flow charts for enforcement activities, it needed to develop a full range of enforcement procedures in accordance with the Framework Agreement to ensure that officers have useful guidance should they need to exercise their statutory powers.

3.2.14 The Authority had recently issued a feed improvement notice. Whilst it was found to be appropriate in the circumstances, auditors were advised that there was some unfamiliarity with the process and the notice had not been drafted and issued in full accordance with the FLECP. In addition the Service needed to ensure that there was timely and appropriate follow-up.

Recommendations

3.2.15 The Authority should:

- (i) Set up, maintain and implement documented procedures for the full range of enforcement actions in accordance with the Feed Law Enforcement Code of Practice and official guidance. [The Standard - 15.2]
- (ii) Ensure that feed improvement notices are drafted and served in accordance with the Feed Law Enforcement Code of Practice, official guidance and the Standard in the Framework Agreement. Ensure that appropriate and timely follow-up is carried out following expiry of the notice. [The Standard - 15.3]

Feed Complaints, Primary Authority Scheme and Home Authority Principle

- 3.2.16 The Authority had a generic consumer advice and enquiries policy which included the investigation of criminal complaints and referrals. This set out that the Authority employed an intelligence led approach to deal with the most serious complaints and those that affected all consumers within the community. The policy stated it was not always appropriate to investigate individual complaints. Auditors were advised that there were few complaints received in relation to feed.
- 3.2.17 File checks on records of three referrals confirmed that appropriate action had been undertaken in each case with relevant and helpful advice provided.
- 3.2.18 The Authority had a strong commitment to the Primary Authority scheme as part of supporting business and developing the local economy. The Authority was Primary Authority for an extensive range of businesses including feed related business and had recently been named “Local Authority of the Year” at the inaugural Primary Authority Awards.

Feed Safety Incidents

- 3.2.19 Whilst the Authority had an established process for responding to feed alerts and Rapid Alert System for Food and Feed (RASFF) notifications this was not documented in a procedure.

Recommendation

3.2.20 The Authority should:

Set up maintain and implement a documented procedure for initiating and responding to feed alerts in accordance with the Feed Law Enforcement Code of Practice.

[The Standard – 14.1]

Advice to Business

- 3.2.21 The Authority had developed a generic business advice, enquiries and charging policy setting out the service, its limitations, and charges that may be made for business advice. The policy stated that the majority of advice services would be provided free, advice would be provided to new businesses, third party advice would not be given and

businesses based outside the Authority would generally be redirected to other Trading Standards services.

- 3.2.22 Appropriate advice was available in accordance with the policy and also provided on inspection and via the Authority's website.

3.3 Internal Monitoring and Third Party or Peer Review

Internal Monitoring

- 3.3.1 The Authority performed some internal qualitative monitoring checks such as accompanied inspections, and carried out some quantitative monitoring, including quarterly overall performance for the percentage of high risk inspections carried out. Internal monitoring also formed an element of team meetings and performance appraisals.
- 3.3.2 The Authority needed to review the scope of internal monitoring to include all feed law enforcement activities such as sampling, inspection and enforcement and to develop appropriate documented internal monitoring procedures.

Recommendation

3.3.3 The Authority should:

Develop and implement a documented internal monitoring procedure to include quantitative and qualitative monitoring of feed law enforcement activities across all areas of the Standard. The procedure should reflect the monitoring activities already undertaken and should be aimed at verifying the Service's conformance with relevant legislation, official guidance and the Standard. Records of monitoring checks should be maintained.
[The Standard - 19.1, 19.2, and 19.3]

Records

- 3.3.4 Records of feed law enforcement activities were maintained electronically and in paper files. Whilst the quality of records of feed premises interventions was variable, records such as complaints, referrals and samples were generally up to date, accurate, and easily retrievable.

Third Party or Peer Review

- 3.3.5 The Authority had not participated in any inter-authority audit, third party review or peer review relating to feed law enforcement in the last two years.

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ANNEX A Action Plan for Cambridgeshire County Council

Audit date: 6 - 7 August 2013

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.5(i) Further develop the Food and Feed Plan in accordance with the Service Planning Guidance in the Framework Agreement, to include all feed demands on the Service, including feed premises profiles and a feed interventions/inspections programme together with a comparison of the resources required to carry out the full range of statutory feed law enforcement activities against the resources available to the Service. [The Standard – 3.1]	31/03/14	The Service will set up and implement a Service Delivery Plan for feed law enforcement in accordance with the Framework Agreement, including identifying the resources required to carry out the full range of statutory feed law enforcement activities and interventions.	National Trading Standards Board (NTSB) risks updated on our back office system and have started the review of all feed premises for appropriate risk.
3.1.5(ii) Carry out an annual performance review based on the service delivery plan and ensure that any variances identified are addressed in subsequent years' service planning. [The Standard – 3.2 and 3.3]	31/03/14	The Service will undertake an annual performance review based on the service delivery plan.	
3.1.8 Further develop the existing procedures and document control system to include the full range of procedures in accordance with the Feed Law Enforcement Code of Practice and official guidance. [The Standard – 4.2]	31/12/13	We will ensure that our Document Control System has the full range of procedures regarding Feed Law Enforcement Code of Practice (FLECP) and official guidance, including appropriate owners, reviewers and review dates.	Key documents identified and many currently ready for upload.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.1.12(i) Set up, maintain and implement a documented procedure for the authorisation of officers based on their competence and in accordance with the Feed Law Enforcement Code of Practice. [The Standard - 5.1]	31/12/13	The Service will set up, maintain and implement a documented procedure for the authorisation of officers, including the review and update of authorisations relating to Feed Law enforcement.	Appropriate staff and competencies identified, documented procedure in preparation.
3.1.12(ii) Review current authorisations to ensure that all officers are authorised to the appropriate level under relevant legislation, in line with their individual qualifications, training, experience and competencies. [The Standard – 5.3]	31/12/13	The Service will set up, maintain and implement a documented procedure for the authorisation of officers which will include identifying appropriate training, qualifications and competency.	Appropriate staff and competencies identified, documented procedure in preparation.
3.1.18 Develop, maintain and implement a documented procedure to ensure that the feed premises database is accurate, reliable and up to date and to ensure that accurate information on feed law enforcement activity is reported in official returns to the Agency. [The Standard – 11.2]	31/12/13	The Service will set up, maintain and implement documented procedures to ensure the accuracy of data in official Agency returns.	The back office database has been reconfigured to utilise the NTSB feed risk factors and hold appropriate categories to provide accurate classifications for official returns.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>3.2.8(i) Ensure that feeding stuffs premises inspections are both risk rated and carried out at appropriate frequencies as specified by the Feed Law Enforcement Code of Practice, giving priority to higher risk feed establishments. [The Standard - 7.1]</p>	<p>31/03/14</p>	<p>The service has adopted the NTSB risk scheme which will provide the appropriate risk rating for feed premises.</p> <p>However, in accordance with the current FLECP the appropriate programmed inspection intervals for high, medium and low risk premises is likely to require a greater resource than is currently available, (this will be identified on completion of the Service Plan noted in the first paragraph of this document (3.1.5(i)) above. Priority will be given to high risk feed establishments.</p> <p>We are aware the current Code of Practice is under review and will take this into account on completion of our Service Plan.</p>	<p>NTSB risks updated on our back office system and have started the review of all feed premises for appropriate risk.</p>
<p>3.2.8(ii) Set up, maintain and implement documented procedures for the range of interventions/ inspections carried out. [The Standard - 7.4]</p>	<p>31/12/13</p>	<p>The Service will set up, maintain and implement documented procedures for the full range of enforcement actions relating to Feed.</p>	

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.2.8(iii) Review and consolidate inspection aides-memoire and ensure that all observations and/or data obtained in the course of an inspection are noted in sufficient detail to provide an adequate record of the assessment and determination of business compliance with relevant feed legislation. [The Standard - 16.1]	31/03/14	<p>The Service will ensure consistency in recording observations made during inspections to provide adequate and appropriate information relating to compliance with relevant feed legislation through regular data checking and officer training.</p> <p>Provide appropriate guidance and examples of the level of detail required on the inspection documentation and recording on back office system.</p>	Rationalised existing inspection forms to identify appropriate single format.
3.2.15(i) Set up, maintain and implement documented procedures for the full range of enforcement actions in accordance with the Feed Law Enforcement Code of Practice and official guidance. [The Standard - 15.2]	31/12/13	The Service will set up, maintain and implement documented procedures for the full range of enforcement actions relating to Feed.	
3.2.15(ii) Ensure that feed improvement notices are drafted and served in accordance with the Feed Law Enforcement Code of Practice, official guidance and the Standard in the Framework Agreement. Ensure that appropriate and timely follow-up is carried out following expiry of the notice. [The Standard - 15.3]	Completed 30/09/13	The Service will ensure that all feed improvement notices are drafted and served in accordance with the Feed Law Enforcement Code of Practice, official guidance and the Standard in the Framework Agreement.	All staff have been trained in the issue of feed improvement notices. Through regular 1:1 supervision these will continue to be reviewed.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3.2.20 Set up maintain and implement a documented procedure for initiating and responding to feed alerts in accordance with the Feed Law Enforcement Code of Practice. [The Standard – 14.1]	31/12/13	The Service will set up, maintain and implement a documented procedure for responding to feed alerts.	
3.3.3 Develop and implement a documented internal monitoring procedure to include quantitative and qualitative monitoring of feed law enforcement activities across all areas of the Standard. The procedure should reflect the monitoring activities already undertaken and should be aimed at verifying the Service's conformance with relevant legislation, official guidance and the Standard. Records of monitoring checks should be maintained. [The Standard - 19.1, 19.2, and 19.3]	31/03/14	The Service will set up, maintain and implement documented procedures to ensure both qualitative and quantitative data checking is undertaken regarding the Service's conformance with the Code of Practice.	

ANNEX B Audit Approach/Methodology

The audit was conducted using a variety of approaches and methodologies as follows:

(1) Examination of LA policies and procedures.

The following relevant LA policies, procedures and linked documents were examined before and during the audit:

- Cambridgeshire Business Plan
- Infrastructure Management and Operations Directorate Service Plan 2013/14
- Supporting Business and Community Service Plan 2013/14
- Compliance Team Action Plan 2013/14
- Food and Feed Plan 2013/14
- Feed Inspection Plan 2013/14
- Feed Sampling Programme 2013/14
- Advice and Enquiries Policy
- Business Advice Policy
- Enforcement Policy
- Feed Sampling Procedure
- Process Flow charts
- Minutes from the East of England Trading Standards Association meetings.

(2) File reviews – the following LA file records were reviewed during the audit:

- Evidence of authorisations and qualifications
- Liaison records
- Feed establishments records
- Feed inspection and sampling records
- Feed complaint/referral/service request records.

(3) Officer interviews – the following officers were interviewed:

- Audit Liaison officer(Lead Feed Officer)
- Acting Head of Service Supporting Business and Community
- Communities/Businesses Officer.

Opinions and views raised during officer interviews remain confidential and are not referred to directly within the report.

(4) On-site verification check:

A verification visit was made with the Authority's officers to a local feed manufacturer. The purpose of the visit was to assess the effectiveness of the officer's evaluation of the compliance of the feed business with legislative requirements.

ANNEX C Glossary

Agricultural Analyst	A person, holding the prescribed qualifications, who is formally appointed by a local authority to analyse feed samples.
Authorised officer	A suitably qualified officer who is authorised by the local authority to act on its behalf in, for example, the enforcement of legislation.
Codes of Practice	Government Codes of Practice issued under Section 40 of the Food Safety Act 1990 as guidance to local authorities on the enforcement of food and feed legislation.
County Council	A local authority whose geographical area corresponds to the county and whose responsibilities include food standards and feeding stuffs enforcement.
Defra	The Department for Environment, Food and Rural Affairs. The Government Department designated as the central competent authority for products of animal origin in England.
District Council	A local authority of a smaller geographical area and situated within a County Council whose responsibilities include food hygiene enforcement.
Environmental Health Officer (EHO)	Officer employed by the local authority to enforce food safety legislation.
FNAO	Feed not of animal origin. Products that do not fall under the requirements of the veterinary control regime.
FVO	Food and Veterinary Office, part of the European Commission, based within the Directorate General for Health and Consumers.
Feed Law Enforcement Code of Practice	Government Codes of Practice issued under the Official Feed and Food Control Regulations.
Feeding stuffs	Term used in legislation on feed mixes for farm animals and pet food.
Food Examiner	A person holding the prescribed qualifications who undertakes microbiological analysis on behalf of the local authority.

Food/feed hygiene	The legal requirements covering the safety and wholesomeness of food/feed.
Food/feed standards	The legal requirements covering the quality, composition, labelling, presentation and advertising of food/feed, and materials in contact with food.
Framework Agreement	<p>The Framework Agreement consists of:</p> <ul style="list-style-type: none"> • Food and Feed Law Enforcement Standard • Service Planning Guidance • Monitoring Scheme • Audit Scheme <p>The Standard and the Service Planning Guidance set out the Agency's expectations on the planning and delivery of food and feed law enforcement.</p> <p>The Monitoring Scheme requires local authorities to submit yearly returns via LAEMS to the Agency on their food enforcement activities i.e. numbers of inspections, samples and prosecutions.</p> <p>Under the Audit Scheme the Food Standards Agency will be conducting audits of the food and feed law enforcement services of local authorities against the criteria set out in the Standard.</p>
Full Time Equivalents (FTE)	A figure which represents that part of an individual officer's time available to a particular role or set of duties. It reflects the fact that individuals may work part-time, or may have other responsibilities within the organisation not related to food and feed enforcement.
HACCP	Hazard Analysis and Critical Control Point – a food/feed safety management system used within food/feed businesses to identify points in the production process where it is critical for food/feed safety that the control measure is carried out correctly, thereby eliminating or reducing the hazard to a safe level.
Home Authority	An authority where the relevant decision making base of an enterprise is located and which has taken on the responsibility of advising that business on food and feed safety/ standards issues. Acts as the central contact point for other enforcing authorities' enquiries with regard to that company's food/feed related policies and procedures.

Informal samples	Samples that have not been taken in accordance with the appropriate sampling regulation (e.g. samples for screening purposes) and/or not sent to an accredited laboratory.
Member forum	A local authority forum at which Council Members discuss and make decisions on food law enforcement services.
Metropolitan Authority	A local authority normally associated with a large urban conurbation in which the County and District Council functions are combined.
Port Health Authority (PHA)	An authority specifically constituted for port health functions including imported food and feed control.
Primary Authority	An authority that has formed a formal partnership with a business in accordance with the Regulatory Enforcement and Sanctions Act 2008.
Public Analyst	An officer, holding the prescribed qualifications, who is formally appointed by the local authority to carry out chemical analysis of food and feed samples.
RASFF	Rapid alert system for food and feed. The European Union system for alerting port enforcement authorities of food and feed hazards.
Regulators' Compliance Code	Statutory Code to promote efficient and effective approaches to regulatory inspection and enforcement which improve regulatory outcomes without imposing unnecessary burdens on businesses.
Risk rating	A system that rates food/feed premises according to risk and determines how frequently those premises should be inspected. For example, high risk premises should be inspected at least every 6 months.
Service Plan	A document produced by a local authority setting out their plans on providing and delivering a food/feed service to the local community.
Trading Standards	The Department within a local authority which carries out, amongst other responsibilities, the enforcement of food standards and feeding stuffs legislation.

Trading Standards
Officer (TSO)

Officer employed by the local authority who, amongst other responsibilities, may enforce food standards and feeding stuffs legislation.

Unitary Authority

A local authority in which the County and District Council functions are combined, examples being Metropolitan District/Borough Councils, and London Boroughs. A Unitary Authority's responsibilities will include food hygiene, food standards and feeding stuffs enforcement.