

**Report on the audit of Official Controls on Feed  
of Non-Animal Origin (FNAO) and Feed  
Establishments  
Including Primary Producers**

Essex County Council  
23-25 August 2016



## Foreword

The audit of local authority feed and food law enforcement services forms 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 (LAs). The LA regulatory functions for animal feed controls are principally delivered through their Trading Standards Services.

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 (amended April 2010), a Feed Law Code of Practice (England) (published May 2014) and a Feed Law Practice Guidance (England) (updated June 2014).

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 food safety, standards and feeding stuffs. Parallel local authority audit schemes are implemented by the Agency's offices in Wales and Northern Ireland.

Following a review of the delivery of official controls for feed law enforcement the FSA introduced a new feed delivery model (NFDM)<sup>1</sup> in April 2014 to promote consistency, efficiency and value for money in the delivery of feed official controls. This delivery model has been implemented in association with the National Trading Standards (NTS) and it promotes a regional approach to delivery, coordinated by NTS.

An innovation of the NFDM was the introduction of a system of 'earned recognition' whereby Feed Business Operators (FeBOs) who demonstrably maintained high standards of feed safety by taking appropriate steps to comply with the law, may have these standards recognised by LAs when determining the frequency of their official controls.

This programme of focused audits is being undertaken to provide assurance to the FSA that the new feed delivery model has been effectively implemented by local authorities and that official controls, as laid down in the Agency's Feed Law Enforcement Code of Practice, Practice Guidance and Framework Agreement, in

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[https://khub.net/documents/portlet\\_file\\_entry/5524476/New+Feed+Delivery+Model+06.07.2016.pdf/2e8585ff-3e92-4362-928a-5d1b6da2f594?download=true](https://khub.net/documents/portlet_file_entry/5524476/New+Feed+Delivery+Model+06.07.2016.pdf/2e8585ff-3e92-4362-928a-5d1b6da2f594?download=true)

regard to FNAO are being carried out by LAs, in order to safeguard animal and public health.

This audit forms part of the programme of audits across a number of animal feed authorities and the findings will be incorporated into a summary report on the outcomes of the overall focused animal feed audit programme.

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 Essex County Council with regard to feed law enforcement. The audit was undertaken as part of the Agency's focused audit programme on feed controls in England. This report has been made publicly available on the Agency's website at

[www.food.gov.uk/enforcement/auditandmonitoring/auditreports](http://www.food.gov.uk/enforcement/auditandmonitoring/auditreports).

Hard copies are available from the FSA's Regulatory Delivery Division, please email [LAAudit@foodstandards.gsi.gov.uk](mailto:LAAudit@foodstandards.gsi.gov.uk) or phone 01904 232116.

### 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 Essex County Council was undertaken under section 12(4) of the Act as part of the Food Standards Agency's annual audit programme. The Agency has taken account of the European Commission guidance<sup>2</sup> on how such audits should be conducted.
- 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 focused audits is to provide assurance to the FSA that the new feed delivery model has been effectively implemented by local authorities. The Agency has taken account of the European Commission guidance on how such audits should be conducted.
- 1.4 Essex County Council was included in the Food Standards Agency's programme of audits of local authority feed law enforcement services, having not been audited for feed service delivery by the Agency in the past five years and was representative of a geographical mix of 11 local authorities selected across England.

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<sup>2</sup> 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)

## **Scope of the Audit**

- 1.5 The audit examined Essex County Council's systems and procedures for the control of feed of non- animal origin (FNAO).
- 1.6 The audit scope included an assessment of local arrangements for implementing the NFDM and included:
- Feed service planning, delivery and review
  - Competence of officers
  - Implementation and effectiveness of feed control activities
  - Maintenance and management of appropriate feed premises database and records in relation to official controls at feed business premises
  - Effectiveness of the Lead Officer role for feed
  - Effectiveness of the Regional Lead role for feed
  - Accuracy and delivery of official reports to the Agency
- 1.7 The on-site element of the audit took place at the Authority's office at County Hall, Market Road, Chelmsford, Essex, CM1 1QH from 23 – 25 August 2016. The audit included a reality check at a feed establishment to assess the effectiveness of official controls implemented by the Service.

## **Background**

- 1.8 At the time of the 2011 census, Essex County Council served a population of 1,393,600, which makes it one of the largest local authorities in England. As a non-metropolitan county council, responsibilities are shared between districts (including boroughs) and in many areas also between civil parish (including town) councils. The trading standards function is delivered at County level.
- 1.9 The Authority had approximately 1000 registered feed businesses which included approved establishments such as feed manufacturers.
- 1.10 The Trading Standards Service was responsible for the delivery of feed hygiene within the County, and was based within the Place Delivery and Strategy group of services, within the Authority's organisational structure. There was no distinct feed safety team, as all officers carrying out feed delivery work did so as part of a broader spectrum of trading standards duties although some officers specialised in feed.
- 1.11 The Service benefitted from a Lead Officer for Agriculture that liaises and channels intelligence and information from neighbouring Local Authorities

in the East of England Trading Standards Association (EETSA) area. This helped to inform the approach to the delivery of interventions at local level. The Lead officer was assisted by the Regional Feed lead and Regional Feed Coordinator.

- 1.12 Auditors were informed during the audit that the service was currently facing an impending restructure and resource review. It was anticipated by Senior Officers that this would result in severe cuts to the Trading Standards resource. The potential impact on feed delivery had not been determined at the time of the audit.
- 1.13 The profile of Essex County Council's feed businesses as at 31<sup>st</sup> March 2015 was:

<b>Type of Feed Premises</b>	<b>Number</b>
Manufacturers and Packers	13
Distributor / Transporter	41
Retailers	171
Food business selling co products / surplus food	96
Stores	17
Arable Farms	329
Livestock farms	343
Importer	2
<b>Total Number of Feed Premises</b>	<b>1012</b>

## 2.0 Executive Summary

2.1 The Authority was generally delivering a risk-based inspection approach although it was not yet aligned with the new feed delivery model. The Lead Officer for Agriculture was effective in terms of overseeing training for less experienced officers and communication of guidance. However, the Authority needed to make improvements to fully meet the requirements of the New Feed Delivery Model, Framework Agreement and the Feed Law Code of Practice (FELCOP). A number of potential improvements in the overall arrangements and controls for feed service delivery were identified. The key strengths and areas for improvement for the LA are set out below.

### 2.2 Strengths:

#### **Service Planning & Delivery**

2.2.1 The Authority had a risk based approach to feed inspection planning and delivery.

2.2.2 In 2015/16 the feed service had participated in an improvement project concerned with the traceability of bird nuts. The feed service had also provided valuable assistance to the Agency in carrying out a joint investigation with an assurance body.

#### **Lead Feed Officer Roles**

2.2.3 The liaison and communication role of the Lead Feed officer was being carried out effectively. The officer worked in partnership with the Regional Feed Lead and had a good awareness of the new feed delivery model. Training was overseen by the Lead Officer and was devised following a skills gap analysis for each officer delivering feed controls. The Lead Officer was an active member of the agriculture forum on the networking and guidance forum the Knowledge Hub.

### 2.3 Key areas for improvement:

#### **Database Accuracy**

2.3.1 The LAs database had not been mapped to the New Feed Delivery Model. It did not allocate a likelihood of compliance score (LOC), or accurately record members of recognised assurance schemes. As a result earned recognition could not be

properly implemented.

### **Earned Recognition and AES Implementation**

- 2.3.2 Earned recognition and alternative enforcement schemes as defined by the Feed Law Code of Practice had not generally been implemented by the Authority, either in terms of procedure, strategy or reduced scheduled inspection frequency.

### **Service Planning**

- 2.3.3 The service plan needed to be reviewed to better reflect the national enforcement priorities document, the new feed delivery model and the actual approach to the intervention programme.

### **Inspection records – Approved premises**

- 2.3.4 Findings from inspections and records relating to approved premises were not easily retrievable in all instances.

### **Qualitative Monitoring**

- 2.3.5 Although qualitative monitoring was carried out the service needed to devise a monitoring procedure and ensure monitoring was recorded.

## **3.0 Audit Findings**

### **3.1 Feed service planning, delivery and review**

#### **Implementation of the Agency's National Feed Priorities document**

- 3.1.1 The Trading Standards Department had developed a Food and Feed Service Plan for 2016/17 that detailed how it would deliver official controls for feed within its area. The Service Plan had been linked to the Essex County Council Corporate Outcomes Framework for 2014-2018.
- 3.1.2 The Plan had been developed in accordance with the Service Planning Guidance in the Framework Agreement. We discussed further development of the Plan to ensure that it reflected the current approach to feed interventions as required by the FELCOP. The current Plan was a combined document that indicated an intervention approach to Feed controls delivery that was only relevant to the services approach to food standards. The Plan would benefit from a specific section on feed that includes the intervention approach, reference to the National Enforcement Priorities document and a reasoned estimate of the

resources required in terms of full time equivalent staff (FTE), to meet the demands on the feed service.

- 3.1.3 The service plan was not ratified at Director or Member level although auditors were informed that it had been presented to the Lead Commissioner for information. Auditors discussed the benefit of ensuring that there was a formal record of Director / Member sign off on the plan as at this time the service was subject to a major restructure that included a significant reduction in financial resource for the Trading standards service over the next two years.

**Recommendation 1 - Service planning**

[The Standard 3.1]

[The National Feed Enforcement Priorities 2016/17]

[The Feed Law Code of Practice 5.1]

Further develop the service delivery plan in accordance with Service Planning Guidance in Chapter 1 of the Framework Agreement to include:

- greater detail in regard to the demands placed on the Service, particularly the approach to the intervention programme with reference to the national enforcement priorities; and
- a comparison of the numbers FTE needed to deliver the programme against those available to the Service.

**3.2 Effectiveness of the implementation and monitoring of earned recognition for feed establishments**

- 3.2.1 There had been limited planned implementation of the scheme for Earned Recognition (ER). Sample evidence and reports obtained prior to the audit showed that the risk scoring system and database in use had not been mapped to the FELCOP with regard to the Likelihood of Compliance Score (LOC). The system was also unable to identify members of assurance schemes other than Red Tractor. As a result the Service was unable to fully identify all feed premises that may benefit from earned recognition.

- 3.2.2 Analysis of the database did show that some inspections were not being carried out at frequencies set out in the Feed Law Code of Practice. The Service was utilising the National Trading Standards Board / Association of Chief Trading Standards Officers (ACTSO), risk rating scheme which

was configured with the scores from an earlier version of the ACTSO scheme guidance which has since been updated. We discussed the importance of ensuring these scores were updated as soon as possible and the LOC score was applied to ensure greater accuracy within the database going forward.

- 3.2.3 The Lead Feed Officer did not regularly access Assurance Scheme websites for the purpose of database cleansing and mapping to indicate where ER should have been applied. The absence of this information would prevent awarding type 1 ER when appropriate. Similarly, because of the lack of implementation of earned recognition on the database and mapping to the LOC score, the Service had not implemented a system for recognising Type 2 earned recognition, i.e. those premises that were not members of Assurance Schemes but were broadly compliant.

**Recommendation 2 – Earned recognition implementation**

[Feed law Code of Practice, Chapter 5.3]

[The Standard, paragraph 11.2]

[See also recommendation 4]

The Authority should review and correct all anomalies regarding Approved Assurance Scheme status, inspection intervals, and level of compliance scores, with a view to recognising earned recognition, maintaining database accuracy and improving the efficiency of use of limited feed official control resources.

**3.3 Competence of officers**

- 3.3.1 The Acting Head of Trading Standards was delegated to authorise officers for carrying out official controls for feed. A documented procedure was not in place for the authorisations and we were informed that officers had received authorisation for all areas of feed legislation irrespective of their level of competency although in practice officers only carried out duties appropriate to their individual qualifications and competencies. This was monitored by the Lead Feed Officer through a process of competency assessment.
- 3.3.2 An annual skills gap analysis was conducted by the Lead Feed Officer. From this, a training programme was produced that would be provided by both internal and external providers. It was clear from discussions with staff that the Service was committed to ensuring staff were well trained and competent to carry out feed law enforcement duties. The Lead Feed Officer had recently attended the FSA Lead Feed Officer competency

assessment course. This had helped to identify compliance with the current FELCOP.

- 3.3.3 File checks also showed that officers had been sufficiently and appropriately trained for feed law enforcement in accordance with their level of authorisation. All officers had received 10 hours annual training based on the principles of continuous professional development, received HACCP training where appropriate, and general enforcement training. Officer qualifications and training records had been maintained by the Authority and were easily retrievable.
- 3.3.4 Officers had access to current guidance through networked folders which were updated by the Lead Feed Officer. Some officers also accessed the feed section of the Knowledge Hub in order to maintain competency.

### **3.4 Implementation and effectiveness of feed control activities**

#### **Inspection**

- 3.4.1 In most instances the Service had utilised FSA model template inspection forms to capture inspection findings and to help officers demonstrate that businesses were being assessed against all relevant legislation.
- 3.4.2 Five feed premises intervention records were selected for assessment. All Interventions at the feed premises had been carried out by appropriately authorised staff. In four out of five cases it was clear that there was an effective assessment of compliance with feed hygiene legislation. This included an assessment of HACCP based systems.
- 3.4.3 Records were found to be easily retrievable however file checks showed that there was a variation in the level of detail recorded between officers. In two records the non-compliances detailed were inconsistent with the risk rating awarded in that the findings suggested the business was less compliant than the rating awarded indicated. Furthermore, an officer had detailed on one report that there was a requirement to carry out a revisit to monitor non-compliance although it was confirmed by the service that the revisit had not been carried out.
- 3.4.4 One of the records examined demonstrated that the risk rating system used generated an inspection frequency that was inconsistent with the FELCOP in that the business was being inspected too frequently.
- 3.4.5 A record of the official control intervention was left with the Feed Business Operator at the conclusion of inspections in all cases. Auditors discussed the need to ensure that officers clearly differentiate between recommendations and legal requirements.

- 3.4.6 Three approved premises files were examined. It was not possible in all cases to retrieve the inspection records on which the approval was based. Furthermore premises files were not structured in accordance with the FELCOP guidance in that HACCP's for approved premises were not retained on file in all cases. The most recent approval looked at had been completed by the Lead Feed Officer. The inspection on which the approval was based was found to be very detailed and the notification was easily retrieved. All premises were appropriate for approval and appeared to have correctly identified activity codes.

**Recommendation 3 – Approved Premises Files**

[The Standard, paragraph 16.1]

[Feed Law Practice Guidance, para 5.11.2]

Maintain up to date accurate records in retrievable form for all approved feed establishments.

**3.4.7 Reality Visit**

- 3.4.8 A reality visit was carried out at a feed mill with the officer that had carried out the last visit. It was clear from the visit that the officer had a good working relationship with the business, was familiar with the processes involved and had a good knowledge of the relevant legislation.

**3.4.9 Improvement Projects**

- 3.4.10 The Service had recently participated In an EETSA improvement project to identify traceability for nuts imported for bird feed. This included carrying out an intervention at a retail premises within the district.

**3.4.11 Assistance to the FSA**

- 3.4.12 The service had recently been asked to give assistance to the Agency in carrying out an investigation. This investigation was based around an allegation that an assured FeBO in Essex was placing on the market a feed material; Palm Oil Mill Effluent (POME) which had been inaccurately described as Palm Oil. The LFO carried out a joint inspection, provided detailed reports and communicated findings clearly and succinctly to the FSA Feed Team. The report and supporting information provided to the FSA post the joint inspection was detailed and enabled the Agency to resolve the issues in a prompt and effective way.

### **3.4.13 Sampling**

- 3.4.14 The Service participated in a feed sampling programme co-ordinated regionally, agreed with NTS and compiled with due consideration to National Enforcement Priorities.
- 3.4.15 Records for 6 samples taken were looked at in detail. None of those selected were FSA funded samples. All of the samples taken had been recorded and documented with analytical results being kept on file. In all instances follow up action had been taken to address the concerns found, including detailed contact and advice to businesses and neighbouring authorities where appropriate.

### **3.4.16 Alternative Enforcement Strategy (AES)**

- 3.4.17 The Service had developed an AES intervention programme aimed at businesses that had been deemed broadly compliant at a previous intervention and met the appropriate activity code detailed in FELCOP. The service had not developed a written AES strategy and was not able to implement a fully compliant AES programme without systems to identify assurance scheme members and a relevant associated LOC score.

#### **Recommendation 4 – Alternative enforcement**

[The Feed Law Code of Practice, paragraph 5.4]

[The Standard, paragraph 7.2]

[The new feed delivery model]

The Authority should develop, document and implement an alternative enforcement strategy and procedure to explain how it will conduct official controls at premises where the use of AES is prescribed by Annex 2 of the Feed Law Code of Practice.

### **3.4.18 Enforcement**

- 3.4.19 The Authority did not report that any feed law enforcement activities had been carried out within the previous two years. The Service had an Enforcement Policy which auditors were informed would be consulted in the implementation of any enforcement activity.

### **3.4.20 Imports and 3rd Country Representatives**

- 3.4.21 The County Council area contained two Designated Points of Entry at Stanstead and Harwich. Responsibility for the delivery of official feed

controls rested with the Local Authorities. The Lead Feed Officer (LFO) had a system of communication with both LA's and advised auditors that throughput of feed was minimal at both locations.

- 3.4.22 The Service was aware of the requirements surrounding imports and 3rd Country Representatives. The Service had identified one business in its area that may have acted as a 3rd country representative although the Service had been unable to confirm current activities and investigations into the FeBO were ongoing.

### **3.5 Maintenance and management of appropriate feed premises database and records**

- 3.5.1 The Service had not developed a specific procedure to ensure the accuracy and completeness of the feed premises database. However, a number of database instructions had been woven into the general procedures to assist officers with the data entry process.
- 3.5.2 Methods for keeping the database accurate included regular liaison with some assurance schemes, the RPA, Animal and Plant Health Agency and the VMD.
- 3.5.3 The Authority had made some good progress in updating the feed register and database by utilising various outside sources for information. This included a mail out to all premises on the Animal Health database and an ongoing programme of database cleansing by the Business Support Team to remove closed premises and duplicate database entries. However, the Service could not demonstrate an overall strategy for dealing with unregistered premises in accordance with the National Feed Enforcement Priorities. In addition not all feed businesses that had been registered had the correct registration activity code allocated. Four Supermarkets were found to be incorrectly coded with the R12 activity and one of the inspection records showed an incorrectly coded R13 premises that had been given an R10 activity code which conflicts with Agency guidance on coding.
- 3.5.4 Access to the database is managed by log-in requirements and user privileges are restricted for the deletion, opening and closing premises records.

### **Recommendation 5 – Database review**

[The Standard, paragraph 11.2]

The Authority should set up, implement and maintain a documented procedure to ensure that its feed database is accurate, reliable and up to date, as the accuracy of such databases is fundamental to service delivery and monitoring, as well to accurate reporting of data to the FSA.

This procedure must include measures to regularly review and correct all anomalies in and between AAS status, inspection intervals, level of compliance scores, total risk scores and registration codes referred to in the audit report.

## **3.6 Lead Officer role for feed**

- 3.6.1 Lead officer arrangements were discussed in detail in terms of the responsibilities of the role for:
- feed programme bidding,
  - internal reporting,
  - ensuring staff training and competency,
  - liaison with other feed leads in the regions,
  - consistency, and
  - the dissemination of information to staff.
- 3.6.2 The knowledge of the Lead feed officer of the requirements of the new feed delivery model was generally good and auditors identified no areas for improvement in respect of liaison, the assessment of training needs and the planning and delivery of training, with the Authority able to demonstrate control in these areas.
- 3.6.3 The Service did not have a documented procedure for the monitoring of feed law enforcement. However, the LFO did carry out qualitative monitoring activities such as shadowed inspections and checks on aides-memoire and inspection reports.
- 3.6.4 Quantitative aspects of the Service, including the delivery of the desktop model in relation to interventions and sampling were monitored regularly via delivery of the quarterly return to the FSA.
- 3.6.5 The LFO was observed to be actively engaged in relevant Knowledge Hub Groups and also works closely and regularly seeks assistance and guidance from the Regional Feed Lead and Regional Coordinator

**Recommendation 6 – Internal monitoring**

[The Standard, paragraph 19.1 & 19.2]

[See also paragraph 3.6.3 of this report]

Develop, implement and maintain a documented internal monitoring procedure for the feed service to verify its conformance with the Standard, relevant legislation, Code of Practice, new feed delivery model and other centrally issued guidance.

This procedure shall include the monitoring of inspection paperwork, including risk rating determination and update, and inspection data entry by feed officers.

Records of all internal monitoring, including annual shadowed inspection visits, shall be made and kept for at least 2 years.

**3.7 Accuracy and delivery of official feed reports to the Agency**

- 3.7.1 The Service does not have any specific documented procedures for assessing the accuracy of official feed reports to the Agency and generally follows official guidance for the submission of returns. In practice NTS returns are checked manually to ensure data is correctly entered.

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Mike Bluff

Food Standards Agency  
Regulatory Delivery Division

## ANNEX A - Action Plan for Essex County Council

**Audit date: 23-25 August 2016**

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p><b>Recommendation 1 - Service planning</b>            [The Standard 3.1]            [The National Feed Enforcement Priorities 2016/17]            [The Feed Law Code of Practice 5.1]</p> <p>Further develop the service delivery plan in accordance with Service Planning Guidance in Chapter 1 of the Framework Agreement to include:</p> <ul style="list-style-type: none"> <li>• greater detail in regard to the demands placed on the Service, particularly the approach to the intervention programme with reference to the national enforcement priorities; and</li> <li>• a comparison of the numbers FTE needed to deliver the programme against those available to the Service.</li> </ul>	31/12/16	Lead feed officer to review and make changes to the Food and Feed Service plan.	Meeting booked with lead food officer for 19/10/16 to discuss development of the plan in relation to feed.
<p><b>Recommendation 2 – Earned recognition implementation</b>            [Feed law Code of Practice, Chapter 5.3]            [The Standard, paragraph 11.2]            [See also recommendation 4]</p> <p>The Authority should review and correct all anomalies regarding Approved Assurance Scheme status, inspection intervals, and level of compliance scores, with a view to recognising earned recognition, maintaining database accuracy and improving the efficiency of use of limited feed official control resources.</p>	30/06/17	<p>Fully implement earned recognition by upgrading Civica/APP to ensure it is fully aligned with the new feed delivery model.</p> <p>Discussion to be had with Regional Lead and EETSA lead feed officers to establish how other LA's are gathering and recording assurance scheme data.</p> <p>Lead feed officer to access the various assurance scheme websites and update APP accordingly.</p>	Meeting booked with lead feed officer and Management lead for Agriculture on 10 <sup>th</sup> November 2016 with business support administrators that oversee changes to Civica/APP.

<p><b>Recommendation 3 – Approved Premises Files</b> [The Standard, paragraph 16.1] [Feed Law Practice Guidance, para 5.11.2]</p> <p>Maintain up to date accurate records in retrievable form for all approved feed establishments.</p>	30/11/16	Lead feed officer to ensure records of approved feed premises are available in hard copy and kept securely stored.	Programmed into lead feed officers calendar for 8/11/16.
<p><b>Recommendation 4 – Alternative enforcement</b> [The Feed Law Code of Practice, paragraph 5.4] [The Standard, paragraph 7.2] [The new feed delivery model]</p> <p>The Authority should develop, document and implement an alternative enforcement strategy and procedure to explain how it will conduct official controls at premises where the use of AES is prescribed by Annex 2 of the Feed Law Code of Practice.</p>	31/7/17	An alternative enforcement strategy will be developed in conjunction with the changes to Civica/APP which will award earned recognition and enable AES to be used correctly.	Meeting booked with lead feed officer and Management lead for Agriculture on 10 <sup>th</sup> November 2016 with business support administrators that oversee changes to Civica/APP.
<p><b>Recommendation 5 – Database review</b> [The Standard, paragraph 11.2]</p> <p>The Authority should set up, implement and maintain a documented procedure to ensure that its feed database is accurate, reliable and up to date, as the accuracy of such databases is fundamental to service delivery and monitoring, as well to accurate reporting of data to the FSA.</p> <p>This procedure must include measures to regularly review and correct all anomalies in and between AAS status, inspection intervals, level of compliance scores, total risk scores and registration codes referred to in the audit report.</p>	31/7/17	<p>Documented procedure to be written once earned recognition has been fully implemented on Civica/APP. These procedures will include regular reviews to ensure updates are made where necessary.</p> <p>Lead feed officer to have training in the changes from business support colleagues and disseminate to feed officers.</p>	Meeting booked with lead feed officer and Management lead for Agriculture on 10 <sup>th</sup> November 2016 with business support administrators that oversee changes to Civica/APP.

<p><b>Recommendation 6 – Internal monitoring</b>  [The Standard, paragraph 19.1 &amp; 19.2]  [See also paragraph 3.6.3 of this report]</p> <p>Develop, implement and maintain a documented internal monitoring procedure for the feed service to verify its conformance with the Standard, relevant legislation, Code of Practice, new feed delivery model and other centrally issued guidance.</p> <p>This procedure shall include the monitoring of inspection paperwork, including risk rating determination and update, and inspection data entry by feed officers.</p> <p>Records of all internal monitoring, including annual shadowed inspection visits, shall be made and kept for at least 2 years.</p>	<p>31/3/17</p>	<p>Lead feed officer to develop monitoring procedures which will include checks on paperwork, APP data input and risk ratings.</p>	<p>None</p>
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## **ANNEX B - Audit Approach/Methodology**

Audit resource was targeted at the key risk areas. We examined any relevant records, instructions, documents, and evaluated procedures and outcomes. We also conducted appropriate audit testing to form an opinion on the controls in place.

The approach consisted of desktop reviews of information requested from the LA in a pre-visit questionnaire, and a 2.5 day onsite audit consisting of:

- Examination of plans, policies and procedures.
- Examination of file records.
- Review of database records
- Interviews with local authority officers - opinions and views raised during officer interviews remain confidential and are not referred to directly within the report.
- On-site verification check:  
A visit to a local feed manufacturer was carried out as part of the audit. 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 and competent officer who is authorised by the local authority to act on its behalf in, for example, the enforcement of food and feed law.
Feed Law Code of Practice	Government Code of Practice issued under regulation 6 of the Official Feed and Food Controls Regulations 2009 as guidance to local authorities on the execution and enforcement of feed law.
County Council	A local authority whose geographical area corresponds to the county and whose responsibilities include food standards, food hygiene at the level of primary production 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.
FNAO	Feed not of animal origin. Products that do not fall under the requirements of the veterinary control regime.
The DG Health and Food Safety - Audit and Analysis	Part of the European Commission, formerly known as the Food and Veterinary Office (FVO).
Feed Law Enforcement Code of Practice	Government Code of Practice issued under the Official Feed and Food Control Regulations 2009.

Feeding stuffs Term used in legislation meaning feed, including additives and pet food, whether processed, partially processed or unprocessed, intended to be used for oral feeding to animals.

Food/feed hygiene The legal requirements covering the measures and conditions necessary to control hazards to ensure fitness for human consumption of a foodstuff/animal consumption of a feed, taking into account its intended use.

Food/Feed standards The legal requirements covering the quality, composition, labelling, presentation and advertising of food/feed

Framework Agreement The Framework Agreement consists of:

- Food and Feed Law Enforcement Standard
- Service Planning Guidance
- Monitoring Scheme
- Audit Scheme

The **Standard** and the **Service Planning Guidance** set out the Agency's expectations on the planning and delivery of food and feed law enforcement.

The **Monitoring Scheme** requires local authorities to submit yearly returns to the Agency on their feed enforcement activities .e. numbers of inspections, samples, prosecutions and notices.

Under the **Audit Scheme** the Food Standards Agency conduct audits of the food and feed law enforcement services of local authorities against the criteria set out in the Standard.

Full Time Equivalent (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 feed safety management system used within 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.
Informal samples	Samples that have not been taken in the prescribed manner laid down in Regulation EC. No 152/2009 laying down the methods of sampling and analysis for the official control of feed.
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.
New Feed Delivery Model (NFDM)	NFDM is a multi-faceted solution to improve the effectiveness of official feed controls, delivered in partnership with key stakeholders, ensuring timely, appropriate, proportionate and consistent delivery of controls to secure compliance with feed law.
Port Health Authority (PHA)	An authority specifically constituted for port health functions including imported food and feed control.
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.
Risk rating	A system that rates food/feed premises according to risk and determines how frequently those premises should be inspected.
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, food hygiene at the level of primary production and feeding stuffs legislation.

Trading Standards Officer (TSO)

Officer employed by the local authority who, amongst other responsibilities, may enforce food standards, food hygiene at the level of primary production 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 (including at the level of primary production), food standards and feeding stuffs enforcement.