

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

Northumberland County Council
16-17 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)¹ 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

1

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 Northumberland 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.

Hard copies are available from the FSA's Regulatory Delivery Division, please email 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 Northumberland 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 guidance² 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 Northumberland 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.

² 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 Northumberland 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, Morpeth, Northumberland from 16-17 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 The County of Northumberland is a large unitary authority, covering 501,000 hectares in total and having a population of approximately 316,028. The Authority covers an area from the Scottish Borders to the boundaries of the Tyne and Wear region, Cumbria and County Durham. The area is highly rural and sparsely populated. The main centres of population are in the south east of the region, around towns such as Morpeth, Ashington and Blyth. The rest of the County is served by the towns of Alnwick, Berwick and Hexham. Business activity in the region consists mainly of smaller companies and sole traders including animal feed businesses.
- 1.9 The Authority had approximately 1726 registered feed businesses in the area, with no approved feed establishments, and 548 business not yet rated.
- 1.10 The Trading Standards and Animal Health Team are responsible for the delivery of feed hygiene within the county. Duties were carried out by approximately 1.5 FTE officers, using 75% of one experienced lead feed officers time and a much smaller proportion of eight other trading standards staff overall time. The lead feed officer also acted as the

Regional Feed officer for NETSA (North East Trading Standards Association).

- 1.11 The scale of the Authority and its range of duties can pose practical challenges to delivering the Service within the available resources. The Service recently became the responsibility of the Chief Fire Officer as Head of Service and the Authority is currently exploring possible new ways of working to take advantage of any common resources and opportunities to help improve the efficiency of its service delivery.
- 1.12 The Service is fully committed to the delivery of the new Feed Delivery Model and the associated principle of Earned Recognition for feed businesses. The Authority is usefully able to draw upon the expertise and experience of its Lead Feed Officer who also sits on the National Agricultural Panel and acts as the Regional Feed Officer for the area, liaising and channelling intelligence and information to 11 other neighbouring local authorities.
- 1.13 The profile of Northumberland County Council's feed businesses reported to the Agency on the 31 March 2016 was as follows:

Type of Feed Premises	Number
Manufacturers and packers	13
Distributors and transporters	58
Co products and surplus foods	37
Stores	14
Arable Farms	92
Livestock farms	1513
Importers	0
Total Number of Feed Premises	1727

2.0 Executive Summary

2.1 The Authority was generally delivering risk-based inspection planning and performing both its lead and regional feed lead officer roles well in terms of liaison, training planning and communication. Only a small 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. The Service is able to draw upon the expertise of its Lead Feed Officer and their detailed practical knowledge of national feed issues to help deliver its feed service in accordance with relevant guidance.

2.2.2 The Service had delivered a successful project developing guidance on feed officer competency and the traceability of waste food products entering the feed chain, the findings of which had been shared nationally.

Lead Feed Officer Roles – Liaison & Communication

2.2.3 The liaison and communication roles of the Lead Feed Officer and Regional Lead Feed Officer were being carried out effectively, and expertise and advice was routinely shared with other feed authorities.

2.3 Key areas for improvement:

2.3.1 Service Planning

The Service Plan would benefit from additional references to the FSA's National Priorities and how these priorities influence the delivery of the Service.

Officer Authorisation

2.3.2 Officer authorisations required review to ensure that they correctly referenced all relevant feed legislation in accordance with the FeLCOP.

Alternative Enforcement

- 2.3.3 The Authority needs to 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 appropriate.

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 Authority had developed a Service Plan for 2016/17 that detailed how it would deliver official controls within its area and the resources required. The Service Plan was developed in accordance with the Service Planning Guidance in the Framework Agreement and included detailed information on the demands on the Service and the Services' annual programme of official controls. The Plan provided details of how these controls would be delivered and included the number of FTE officers available to deliver official controls. The Plan is signed off at the appropriate Member forum annually. At the time of the audit the Plan had been presented to the Scrutiny Committee and was awaiting formal sign off.
- 3.1.2 The Plan usefully included a detailed annual review of service delivery, which included delivery of feed controls against its planned targets for the year.
- 3.1.3 The Service Plan did not provide any specific detail as to how the FSA's National Enforcement Priorities for feed will be integrated into the work of the Service although the Authority highlighted the fact that sometimes the priorities in the document were not always specifically relevant to the business profile and nature of feed activity in the Northumberland area. This made it difficult on occasions for the Service to illustrate to Members the importance of the FSA's National Priorities document.
- 3.1.4 Auditors were informed that the Lead Officer for feed considers the relevant FSA document to see how the stated priorities will influence the delivery of the Services' annual programme of official controls and there was clearly a level of awareness of these priorities within senior management. Based upon discussions and interviews with staff during

the audit there also appeared to be a detailed awareness amongst staff of how the priorities influenced the day to day execution of their duties.

Recommendation 1 - Service planning

[The Standard 3.1]

[The National Feed Enforcement Priorities 2016/17]

Provide more detailed reference to the National Feed Enforcement Priorities and how the Service plans to incorporate the priorities into the service delivery for the year. In addition, provide details of how alternative feed control methods available under the new feed delivery model will be used in the County to provide an equivalent level of feed safety assurance.

- 3.1.5 The Authority had taken a risk-based approach to bidding for and delivering feed inspections, incorporating a consideration of geographical proximity in some cases for the sake of efficiency.
- 3.1.6 The Service had carried out a number of useful NTS Projects in the past including an officer competency project which resulted in the Authority developing a competency template for other LAs throughout the country to use and had posted this on the Knowledge Hub. Other projects in the past have focused on assessing waste food potentially entering the animal feed chain. The Authority stated that it would take account of the SWERCOTS AES toolkit as the template as part of its future approach to AES.
- 3.1.7 The feed service had no planned service sharing arrangements with other local authorities in the region.
- 3.1.8 The Authority reported that it operated a policy of routinely updating registration data on receipt of registration forms from approved assurance schemes (AAS) and any promotional events around the County.
- 3.1.9 It was evident that the Authority shared feed intelligence through NETSA.

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

- 3.1.10 The Authority had recently reviewed its feed premises database allowing it to now implement the scheme of Earned Recognition for feed establishments. Following pre-audit database checks and further discussions and assessments during the audit auditors were able to confirm that the Authority was committed to the implementation of the

scheme of Earned Recognition for feed establishments. The Lead Feed Officer had attended appropriate training and cascaded training to all feed officers. The Authority advised auditors that no feed premises had yet become due an alternative type of intervention (Tier 1) under earned recognition. The Authority was aware of the guidance published by ACTSO and the National Agriculture Panel on implementing earned recognition.

- 3.1.11 The Authority's database and risk scoring system was capable of identifying primary production premises who were members of FSA's approved assurance schemes (AAS).
- 3.1.12 The Authority's database system was capable of identifying premises suitable for both Type 1 and Type 2 earned recognition and appropriate likelihood of compliance scores had been calculated on the system. The Authority had signed up to the Agricultural Industries Confederation (AIC) and Red Tractor (RT) websites and reported that it was checking AIC and RT updates regularly.

Promotion of the importance of feed hygiene

- 3.1.13 The Authority had not planned any promotional events for feed for 2016/17 but officers added that their approach to feed promotion was an *ad hoc* one which did not exclude the possibility. The Lead Feed Officer provided evidence of talks and seminars provided to local farmers via the NFU, which could include any relevant animal feed issues.
- 3.1.14 The Authority did not carry out any direct analysis of the impact of specific promotional activities, but advised auditors that it sent a general customer satisfaction questionnaire to all businesses.

3.2 Competence of Officers

- 3.2.1 The Service had developed a documented authorisation procedure that included a guide outlining the competency requirements for each type of feed officer and a suitable competency matrix. There was an appropriate scheme of delegation in place for feed enforcement which the Authority could demonstrate.
- 3.2.2 Authorisations were appropriately signed, however file checks indicated that officers were not authorised for individual regulations under the Animal Feed (Hygiene, Sampling etc. and Enforcement)(England) Regulations 2015, contrary to advice from the Food Standards Agency and the Standard in the Local Authority Framework Agreement on Feed and Food. The Authority informed auditors that officer authorisations were due to be reviewed in the near future to harmonise the approach taken between the food standards, feed and food hygiene teams.

- 3.2.3 A system of annual staff appraisal identified and monitored staff training needs, including those specific to feed law enforcement. Any training needs identified were then incorporated into a staff development plan.

Recommendation 2 – Officer Authorisations

[The Standard, paragraph 5.3]

Review and amend the schedule of authorisation for feed officers, to ensure that officers are appropriately authorised under all relevant animal feed related legislation. The extent and limitations of officers' powers in relation to their feed duties under the Animal Feed (Hygiene, Sampling and Enforcement) Regulations 2015 should be part of this process, ensuring that the level of authorisation and duties of officers is consistent with their qualifications, training, experience and the Feed Law Code of Practice.

- 3.2.4 The training records and authorisations of five feed officers were checked by auditors, including those of the Lead Feed Officer. File checks demonstrated that officers had received appropriate training for feed law enforcement in accordance with their level of authorisation. Generally all officers had received at least 10 hours annual training based on the principles of continuous professional development (CPD), including HACCP training where appropriate, and general enforcement training. Generally officer qualifications and training records had been maintained by the Authority and staff.
- 3.2.5 A number of officers were registered on the Agriculture Community Knowledge Hub forum. Officers were able to demonstrate their use of the Hub and suitable information exchange mechanisms were in place.

3.3 Implementation and effectiveness of feed control activities

Inspection

- 3.3.1 The Service had produced a documented feed premises inspection procedure which provided guidance for officers on carrying out interventions and revisits, the risk scoring scheme and links to assurance scheme websites.
- 3.3.2 The Authority had completed almost all of its 2015/16 planned inspections based on the new feed delivery model.

- 3.3.3 The Service had been utilising model template inspection forms developed by the FSA for carrying out inspections and was using the FSA's risk scoring system. The database had been configured to allocate the likelihood of compliance (LOC) risk score. The Authority had developed a series of useful and easily accessible work instructions for officers to provide a step by step instruction on how to enter risk scores correctly for various types of businesses, under the risk assessment scheme.
- 3.3.4 Auditors discussed how the Service selected the establishments to be inspected in its intervention programme based on the new feed delivery model. Auditors were informed by the Lead Officer that this was generally done on the basis of time since the last inspection unless other intelligence was available.
- 3.3.5 The Authority was able to demonstrate compliance with the memorandum of understanding between the National Agriculture Panel (NAP) and the Veterinary Medicines Directorate (VMD) at feed businesses regulated by both organisations.
- 3.3.6 File checks on a sample of inspection records showed that in every case detailed and comprehensive inspection findings had been recorded to help support and justify the risk scores allocated. Records were easily retrievable and feed businesses had been risk rated appropriately.
- 3.3.7 Businesses were routinely provided with a copy of the inspection aide memoire containing inspection findings which were routinely discussed with FeBO's. However auditors discussed the benefit of providing business with clear written details of non-compliances with actions and timescales as appropriate, to support any potential legal future enforcement and prevent any misunderstanding or ambiguity. Auditors also discussed the need for the Authority to ensure that all advice offered to business is also captured in its annual return to the Agency.

Sampling

- 3.3.8 The Service had developed a documented feed sampling policy and procedure and suitable sampling programme co-ordinated regionally, agreed with NTS. Auditors were able to confirm that the programme met the national enforcement priorities, and included a number of appropriate samples including five samples for methanol/ heavy metals and two samples of on farm mix residues for mould growth.
- 3.3.9 The records of five sample results were checked. All the samples taken had been recorded and documented with analytical results being kept on

file. In all cases appropriate follow up action had been taken to address the concerns found, including detailed contact and advice to businesses.

Alternative enforcement

- 3.3.10 Alternative Enforcement Strategies (AES) had not yet been implemented by the Authority although some inspections had been carried out as part of their current Type 2 AES approach. Auditors were advised that no AES visits had yet been carried out due to the length of time since some inspections had been carried out, with full inspections being maintained for the present time. Auditors recommended the development of a more formal AES strategy, developed in accordance with the FeLCOP and preferably referenced in its Service Plan, to describe its current and future plans for AES interventions. The Lead Feed Officer had begun to consider using AES toolkits to help deliver appropriate AES interventions.

Recommendation 3 – Alternative enforcement

[The Feed Law Code of Practice, paragraph 5.4 & 5.6]

[The Standard, paragraph 7.2]

[The new feed delivery model]

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.

Enforcement

- 3.3.11 The Authority had a suitable Enforcement Policy and relevant documented procedures in place for officers, but had not found it necessary to carry out any formal enforcement activities in the last two years.

Imports and 3rd Country Representatives

- 3.3.12 The Authority had Blyth port in its area but through regular liaison with the port confirmed that no animal feeding stuffs were arriving at the port. The Authority was aware of the requirements surrounding imports and 3rd Country Representatives but had no such businesses in its area at the time of the audit.

Verification Visit to a feed establishment

- 3.3.13 During the audit, a verification visit was undertaken to a small scale brewery supplying spent grain to a local farmer 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. 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 Maintenance and management of appropriate feed premises database and records

- 3.4.1 The Authority had a well-established feed register and feed establishment database and identified any new and existing feed businesses not on the register via a number of methods. These included notification of all new food businesses via Environmental Health Teams, the use of assurance scheme databases, other local knowledge and updates from the Animal and Plant Health Agency (APHA) of new livestock keepers in the area.
- 3.4.2 The feed register contained a mix of single and multiple farm premises registrations. We acknowledged that further guidance from the FSA was needed for authorities on the method for recording farm establishments with multiple operations and multiple holdings to ensure consistency in feed registers across the country.
- 3.4.3 The Service had developed a suitable procedure to ensure the accuracy and completeness of the feed premises database and evidence was noted of regular cross checks and reports being carried out to help verify the accuracy of the feed premises database. The databased had recently been subject to internal review and audit checks on the Authority's database prior to the audit did not reveal any significant issues.
- 3.4.4 Access to the database was managed by appropriate log-in requirements and user privileges. Personnel restrictions were imposed in respect of changing premises details. Feed inspectors were only permitted to enter visit details. The database server was backed up on a daily basis.

3.4.5 The NTS annual desktop exercise appeared to be accurate based on database checks, as was the NTS quarterly monitoring return.

3.5 Lead Officer role for feed

3.5.1 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
- dissemination of information to staff.

3.5.2 The knowledge of the Lead Feed officer of the requirements of the new feed delivery model was extensive 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 compliance in these areas.

3.5.3 The Lead Feed Officer for the Service also sits on the National Agricultural Panel (NAP) and acts as the Regional Feed Officer for the area, liaising and channelling intelligence and information to 11 other neighbouring local authorities. The Officer had prompt and effective liaison arrangements in place, with the FSA, APHA, and VMD and the team's own feed officers. New guidance and NAP updates were fed back directly to feed officers by the Lead Officer and followed up verbally where important.

3.5.4 The Service had a documented procedure for the monitoring of feed law enforcement. A number of monitoring activities were being carried out which included routine checks on inspection aides memoire, monthly "1 to 1" meetings, regular team meetings and occasional accompanied inspections, although these were not always formally recorded.

3.5.5 In addition 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. Feed service requests and complaints were also monitored for numbers to help inform the demands on the service.

3.6 Regional Lead role for feed

3.6.1 The Lead Feed Officer for the Authority was also the Regional Lead Feed Officer (RLFO) and chaired the Regional Feed Group for the NETSA region. Arrangements were discussed in detail in terms of the responsibilities of the role for:

- Bidding and allocation,
- Regional training needs assessment and delivery,
- Regional reporting to the FSA,
- Liaison with other feed leads and regulators in the region and nationally,
- Consistency and the dissemination of information from the NAP representative and to other feed leads.

Auditors identified suitable and effective systems in place regarding the above roles with no areas for improvement identified.

3.6.2 Auditors noted that the RLFO had been proactive in supporting other local authorities in the region with their own expertise.

3.6.3 The RLFO reported that consistency training had been carried out regionally organised by LFO in relation to feed inspections, with further training planned for the future on reviewing audits and sampling. No peer reviews or internal audits of quality systems have been carried out.

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. In practice annual feed returns are subject to a number of validation reports built into the database, whilst NTS returns are checked manually to ensure data is in the correct fields.

3.7.2 The lack of written warnings reported via the Authority's feed return to the FSA was discussed. It was agreed that the anomaly was possibly caused by misinterpreting the FSA's definition of a written warning as any legislative non-compliance brought to a FeBOs attention in writing. The Authority agreed to review and discuss appropriate recording and coding of written warnings for feed with relevant officers. The NTS annual desktop exercise appeared accurate as was the NTS quarterly monitoring return. There were no reported technical issues with the uploading and submission of the returns.

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 John Ashcroft

Food Standards Agency
Regulatory Delivery Division

ANNEX A - Action Plan for Northumberland County Council

Audit date: 16-17 August 2016

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
<p>Recommendation 1 - Service planning [The Standard 3.1] [The National Feed Enforcement Priorities 2016/17]</p> <p>Provide more detailed reference to the National Feed Enforcement Priorities and how the Service plans to incorporate the priorities into the service delivery for the year. In addition, provide details of how alternative feed control methods available under the new feed delivery model will be used in the County to provide an equivalent level of feed safety assurance.</p>	<p>May 2017</p>	<p>The Food and Feed Plan is produced on a yearly basis and gives an overview of the work carried out in the previous year. As a result the timescale stated takes into account the need to review the previous year's work. As suggested the plan will be amended to include and raise the priorities of the FSA priorities and how Northumberland feeds into them.</p> <p>In terms of AES mention will be made in the plan about how we will set up and use this method of inspection.</p>	<p>The need to amend the plan has been raised with the management team who produce the whole plan. Consideration will be given when the FSA priorities for 2017/2018 are made known.</p> <p>In terms of AES the service has already looked at the SWERCOTS toolkit on the knowledge hub.</p>
<p>Recommendation 2 – Officer Authorisations [The Standard, paragraph 5.3]</p> <p>Review and amend the schedule of authorisation for feed officers, to ensure that officers are appropriately authorised under all relevant animal feed related legislation. The extent and limitations of officers' powers in relation to their feed duties under the Animal Feed (Hygiene, Sampling and Enforcement) Regulations 2015 should be part of this process, ensuring that the level of authorisation and duties of officers is consistent with their qualifications, training, experience and the Feed Law Code of Practice.</p>	<p>April 2017</p>	<p>Discussions will take place with our legal services team in relation to drafting new authorisations.</p> <p>Authorisations will now be drafted in terms of competency and training and be specific to the appropriate parts of the Regulations.</p>	<p>Discussion with unit manager about the need to change the authorisations has taken place.</p>

<p>Recommendation 3 – Alternative enforcement [The Feed Law Code of Practice, paragraph 5.4 & 5.6] [The Standard, paragraph 7.2] [The new feed delivery model]</p> <p>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>	<p>April 2017</p>	<p>Although the service does not carry out any AES visits and nothing is planned to 2019 due to the risk score, the service will produce and have it recorded in the Food and Feed Plan what policy we will be using</p>	<p>We have looked on the Khub and have considered the SWERCOTS AES toolkit, which we will to utilise for Northumberland.</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 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 brewery 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.
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.
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	Government Code of Practice issued under the

Code of Practice	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	<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 to the Agency on their feed enforcement activities .e. numbers of inspections, samples, prosecutions and notices.</p> <p>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.</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 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.
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 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.
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.
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.