



Norfolk County Council

Community & Environmental Services

Trading Standards Service

Food & Feed Law Enforcement Plan
2017-18



**Produced in accordance with the requirements of the
Food Standards Agency Framework Agreement**



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The Food Standards Agency (FSA) Framework Agreement requires Food & Feed Law Enforcement Plans to be laid out in a common format but recognises that, as local authorities may have corporate service plan templates, they may use the corporate format as long as the information requirements laid out in the Agreement guidance are included and are separately identifiable. Therefore wherever possible this Annex makes reference to the applicable sections of the Trading Standards Service Plan 2017-18 rather than replicating the information it contains.

Section One: Trading Standards Service Aims and Objectives

1.1 Aims and Objectives

The Trading Standards Service priorities of:

- **Enabling** economic growth by providing support for businesses and ensuring a level playing field by tackling the most serious illegal trading
- **Safeguarding** communities and vulnerable people by engaging with communities and businesses to build resilience to scams and rogue traders
- **Protecting** public safety, health and well-being and ensuring trading is legal, honest and fair

are set out in our golden thread diagram on page 6 of the Trading Standards Service Plan 2017-18.

1.2 Links to Corporate Strategic Ambitions

The County Council's priorities are:

- **Excellence in education** – We will champion our children and young people's right to an excellent education, training and preparation for employment because we believe they have the talent and ability to compete with the best. We firmly believe that every single child matters.
- **Real jobs** – We will promote employment that offers security, opportunities and a good level of pay. We want real, sustainable jobs available throughout Norfolk.
- **Good infrastructure** – We will make Norfolk a place where businesses can succeed and grow. We will promote improvements to our transport and technology infrastructure to make Norfolk a great place to do business.
- **Supporting Vulnerable People** – We will work to improve and support quality of life, particularly for Norfolk's most vulnerable people.

How Trading Standards helps to deliver the County Council's strategy, particularly in relation to real jobs and supporting vulnerable people is captured in our golden thread diagram on page 6 of the Trading Standards Service Plan 2017–18.

Section Two: Background

2.1 Profile of the Local Authority

The population of Norfolk in 2015 was estimated to be 885,000. The age profile of Norfolk's population is much older than England as a whole with 23.4% of people being aged 65 and over compared to 17.6% for England.

Norfolk is the fifth largest of the 27 two tier (or shire) counties in England with a geographical area of 549,751 hectares. The population density is one of the lowest for any of these counties, giving Norfolk a predominantly rural character.

Nearly two thirds of VAT registered businesses in Norfolk are located in rural locations with 90% of these being small enterprises employing 10 people or less.

Agriculture remains a large employment sector with 11% of all VAT and PAYE registered enterprises being in this sector. In particular the County has an above average livestock population of commercial poultry and pigs (first and second largest respectively for any local authority area in the country).

The health and life sciences sector is also an important part of the economy in Norfolk. The Greater Norwich area in particular is home to a cluster of internationally renowned research organisations, such as the Institute for Food Research. These organisations employ some 2,700 scientists which is the largest concentration of health, food, plant and bio scientists in Europe. The Greater Norwich area has also been awarded Food Enterprise Zone Status.

2.2 Organisational Structure

The structure of the Trading Standards Service is set out on page 2 of the Trading Standards Service Plan 2017-18.

The Trading Standards Service currently reports, via the Assistant Director of Environment & Planning, David Collinson, to the Executive Director of Community and Environmental Services.

The Executive Director of Community and Environmental Services, Tom McCabe, reports to the Communities Committee. The Chairman of the Committee is Councillor Mrs Margaret Dewsbury, Margaret.dewsbury@norfolk.gov.uk.

The Council has 84 elected Members. The current political makeup of the Council is: Conservative 42 council seats, Labour 14, UKIP 12, Liberal Democrat 10, Green Party 3, 2 non-aligned and 1 vacant.

Feed and food law enforcement is the responsibility of the Business, Food and Farming Section. The section's functions are:

Providing support for Norfolk based businesses to further economic growth;

- delivering targeted proactive business information to achieve compliance, promoting self-help

- providing business advice and support on request to food and farming businesses, including chargeable advice
- acting as 'home/primary authority' for Norfolk based food and farming businesses
- development of effective business engagement and partnerships to improve access to business advice and information.

Ensuring the standards of animal health and welfare; the quality, safety and hygiene of the food chain, and the maintenance of metrological trading standards through delivery of intelligence-led compliance programmes, including sampling, inspections, verifications and market surveillance enforcement activities in the following areas:

- Animal health and welfare, including disease control and licensing
- Primary food production including fertilizers, animal feeding stuffs and food hygiene
- Food standards
- Legal metrology

Intelligence-led interventions and investigations to tackle identified issues emerging from the tasking and coordination process.

2.2.1 The manager responsible for the delivery of official feed and food controls is:

Jon Peddle
Business, Food and Farming Manager
Email: jon.peddle@norfolk.gov.uk
Tel: (01603) 224380

The Lead Feed Officer is Colin Maxwell and the Lead Food Officer is Julie Smith, both based in the Business, Food and Farming team. The Food Law Code of Practice lays down the responsibilities and competencies of the Lead Food and Feed role (which may be more than one person) which are shared in the Service between Jon Peddle, Colin Maxwell (feed) and Julie Smith (food).

2.2.2 The Authority has contracted with Public Analyst Scientific Services Ltd (PASS) to provide the public analyst and agriculture analyst functions for the County.

2.3 Scope of the Animal Feed and Food Service

The Trading Standards Service delivers a range of animal feed and food enforcement services. Specific functions are:

- Programmed inspections at animal feed and high-risk food premises
- Targeted enforcement activities
- Inspections and other enforcement activities arising from complaints and referrals
- Sampling of food and animal feed for analysis and/or examination as part of EU, national, regional and local programmes
- 'Home/Primary Authority' responsibilities
- Responding to food and feed safety incidents

- Provision of information, advice and support for businesses
- Publicity including public awareness campaigns
- Working in partnership with other agencies involved in the protection of the food chain including the Food Standards Agency (FSA); the Department of the Environment, Food and Rural Affairs (Defra); the Department of Health (DH); Public Health (PH); the other ten local Trading Standards authorities who together make up the East of England Trading Standards Authorities (EETSA); the seven District Council Environmental Health Departments in Norfolk and the Meat Hygiene Service.

The animal feed and food law enforcement service is delivered exclusively by officers employed by the County Council, alongside other similar services, for example, the inspection of weighing and measuring equipment.

2.4 Demands on the Animal Feed and Food Service

Using the appropriate risk scoring profile food businesses are scored on a high, medium or low risk basis. There are 59 high-risk, 4,318 medium-risk and 3,721 low-risk food businesses recorded on the Trading Standards Service's database, totalling 8,098 food businesses.

The appropriate risk scoring profile for feed businesses scores them on a frequency of inspection basis from 1 to 5 years with a score of 1 being the highest risk and 5 being the lowest. There are 5,658 agriculture businesses recorded, 3 of which are high-risk, 2,654 medium-risk and 3,001 low-risk.

A number of businesses are designated both food and feed businesses. The Trading Standards Service conducts food standards, feed standards, feed hygiene and food hygiene at primary production inspections or a combination of these interventions at these businesses.

There are 372 food manufacturers in Norfolk, 5% of the sector, ranging from major multinational companies to cottage industries. The majority of food businesses are caterers (4,856 = 60%) such as public houses, restaurants and hotels or retailers (2,092 = 26%) including general stores and bakers.

The County has 30 animal feed, including pet food, manufacturers as well as a very large number of on-farm mixers.

A significant percentage of the companies with which the Trading Standards Service has a 'home/primary authority' relationship are within the food and agriculture sectors.

2.5 Enforcement Policy

The Community and Environmental Services (CES) Directorate is responsible for a range of regulatory functions, including Trading Standards, Planning Enforcement (mineral and waste sites) and Highways (Networks and Maintenance) and the CES Enforcement Policy has been implemented, having regard to the established legal framework for decision-making, the Code for Crown Prosecutors (CPS) and the "Regulators' Code" published by Regulatory Delivery (RD).

Section Three: Service Delivery

3.1 Animal Feed and Food Premises Inspections (Interventions)

The Trading Standards Service reviews its policy in relation to inspections (interventions) at business premises on an annual basis in accordance with the principles of better regulation, the Food Law Code of Practice (England) and the Feed Law Code of Practice (England).

3.1.1 In relation to feed businesses this service takes part in the regional approach to feed enforcement with its EETSA partners and liaises with National Trading Standards (NTS) and the FSA. At the time of compiling this plan the number of Norfolk feed visits required by the NTS/FSA programme for the forthcoming year, based on a full risk based inspection programme, is 583. This proposed programme predominantly includes lower risk livestock and arable farms.

This Service will inspect all feed businesses in Norfolk that are deemed to be higher risk by virtue of the previous trading history or the appropriate risk scheme, on at least an annual basis. In addition, intelligence-led inspections or other interventions will be conducted at those feed business sectors presenting the highest risk. It will also be appropriate, on occasion, to respond with inspections or other interventions where intelligence is received via consumer/trader complaints or referrals from other enforcement agencies about the non-compliance with trading standards of individual feed businesses. In line with Hampton principles and the resources available the Service will not therefore, as a matter of routine, carry out inspections at medium or lower risk feed businesses unless they are visited as a result of the aforementioned factors.

The above measures are intended to focus our available resources on the areas of greatest risk, using available intelligence, and as such the Service will not be able to fulfil a feed inspection programme in accordance with the requirements of the Feed Law Code of Practice (England). This discrepancy is covered in greater detail under section 4: Resources.

3.1.2 In relation to food businesses, the Service will inspect all food businesses in Norfolk that are deemed to be high-risk by virtue of the previous trading history or the appropriate risk scheme, on at least an annual basis. In addition, intelligence-led inspections or other interventions will be conducted at those business sectors presenting the highest risk to the food chain and consumers/other legitimate businesses. It will also be appropriate, on occasion, to respond with inspections or other interventions where intelligence is received via consumer/trader complaints or referrals from other enforcement agencies about the non-compliance with trading standards of individual businesses. In line with Hampton principles and the resources available the Service will not therefore, as a matter of routine, carry out inspections at medium or low risk food businesses unless they are visited as a result of the aforementioned factors.

The above measures are intended to focus our available resources on the areas of greatest risk, using available intelligence, and as such the Service will not be able to fulfil a food inspection programme in accordance with the requirements of the Food

Law Code of Practice (England). This discrepancy is covered in greater detail under section 4: Resources.

3.1.3 The Service is aware of a number of high risk food and feed manufacturing businesses within its local authority area that are partnered with other Trading Standards Services through Primary Authority Partnerships. It is the case with these businesses that they are subject to the audit and control of their respective Primary Authority Trading Standards Service and that Service takes on the responsibility for ensuring the business is compliant. It is also the case that interventions carried out by this Service at such businesses, and any post intervention work we would otherwise undertake with that business, can be limited by the scope of controls imposed by any Primary Authority agreement. In such circumstances this Service will not include such businesses in its risk based intervention programme. We will, however, ensure any intelligence received locally is passed on to the relevant Primary Authority Service to enable them to take the necessary steps to ensure the business they have responsibility for is legally compliant.

3.1.4 The Service has assessed the value of carrying out unannounced inspections as opposed to announced inspections. It applies the following policy on animal feed and food inspections and audits:

- (a) Where official controls take the form of an audit or there is a need to have the feed or food business operator present e.g. so that records can be examined then such visits will be announced. In these cases prior notification will be kept to a minimum.
- (b) In all other cases and in particular where previous visits or intelligence suggests that serious non-compliances have occurred, visits will be unannounced. All establishments will be subject to ad hoc visits which will be unannounced.

The Service will keep this policy under review and, if the policy leads to a disproportionate negative impact on the use of resources of both the Service and Feed and Food Business Operators, it will be revised.

3.1.5 The inspection programmes for food and animal feed are shown below:

Project Name	Project Description/Outcomes	Staffing/Other Resources*	
		2016/17	2017/18
Feed Hygiene & Standards Inspection Programme	To inspect 149 agriculture businesses, e.g. selected feed mills, importers, retailers and farms. To ensure compliance in relation to feed labelling/packaging, stock rotation/storage, feed hygiene, record keeping/traceability and sale or use of prohibited materials.	0.25 FTE	0.25 FTE
Inspection of High-Risk Food Businesses	To carry out inspections at 59 businesses identified as high risk for food.	0.9 FTE	0.8 FTE
*Excluding managerial, administrative and legal support but including revisits and follow up action			

Animal feed and food inspections are carried out by suitably qualified, competent and experienced trading standards officers. Some targeted enforcement activities are carried out by trainee trading standards officers, studying for the Diploma in Consumer Affairs and Trading Standards (DCATS), adequately supervised by qualified staff.

Feed/Food Standards Inspections are carried out in accordance with the Feed Law Code of Practice (England) and the Food Law Code of Practice (England).

3.2 Animal Feed and Food Complaints

Anticipated resource requirements for handling animal feed and food complaints are based on the complaint/contact numbers received in previous service years, the nature of those complaints/contacts and the level of enforcement response required. The number of food complaints/contacts is anticipated to be 137 and the number of agriculture complaints/contacts is anticipated to be 15.

Project Name	Project Description/Outcomes	Staffing/Other Resources*	
		2016/17	2017/18
Complaints and Referrals	To undertake reactive enforcement in response to complaints from other enforcement agencies, businesses and the general public in relation to animal health, agriculture and food matters to ensure legal compliance. Analysis will be undertaken to identify further proactive work, identify trends and report on significant outcomes and impacts.	0.05 FTE (feed)	0.05 FTE (feed)
		0.30 FTE (food)	0.30 FTE (food)
*Excluding managerial, administrative and legal support			

In addition to reactive complaints/referrals work, information and advice is made available to consumers. This is achieved through signposting to the Citizens Advice 'Adviceguide' website via our website www.norfolk.gov.uk/tradingstandards.

3.3 Home Authority Principle and Primary Authority Scheme

Norfolk Trading Standards supports the Home Authority Principle administered by the Chartered Trading Standards Institute (CTSI). The Service also supports Primary Authority Partnerships administered by Regulatory Delivery (RD), although this is an area the Service is still developing.

The Service will provide the following levels of service to Home Authority/Primary businesses:

- Place special emphasis on the control of goods and services originating within Norfolk
- Actively promote the benefits of the Home/Primary Authority system to businesses within Norfolk
- Designate a Home/Primary Authority Officer or team to each business, with the relevant competencies or access to the necessary expertise to be able to offer advice
- Respond to requests for advice and guidance from Home/Primary Authority businesses
- In the case of Primary Authority businesses issue assured advice where it is appropriate to do so
- Facilitate a response to enquiries raised by other authorities
- Maintain Home/Primary Authority records of relevant incidents, business policies and diligence procedures, where known
- Maintain confidentiality in relevant circumstances
- Ensure Home/Primary Authority businesses are aware of our procedure for dealing with complaints or disagreements
- Have in place arrangements to notify other authorities of indulgences relevant to “subsequently corrected” errors
- Participate in relevant sector groupings of Home/Primary authorities
- Support national advice and conciliation procedures, where appropriate.

Home/Primary Authority businesses will be inspected/visited or otherwise contacted:

- As part of the inspection programme for high-risk businesses, or
- As part of the planned series of targeted enforcement activities, or
- As a result of a complaint/referral received, or
- To maintain the Home/Primary Authority relationship.

Currently, the Service has a Home or Originating Authority relationship with 144 food businesses and 13 animal feed manufacturers. Although under development at the time of writing this plan the Service has Primary Authority Partnerships with two businesses, both of which relate to the agricultural sector. The resources required to handle complaints and service requests relating to these Home/Primary Authority businesses are included in Sections 3.2 and 3.4.

3.4 Advice to Business

The Trading Standards Service works with businesses to help them to comply with trading standards and to encourage the use of good practice. On receipt of business requests for advice we will respond in a number of ways including:

- directing the business to our website or that of a partner organisation, such as the Chartered Institute of Trading Standards’ Business Companion
- referring the business to another agency
- providing leaflets produced by partner organisations, our business briefings or standard letters

- providing comprehensive bespoke information or advice via the telephone, email or a letter, and/or
- visiting the business to provide comprehensive advice.

In each case, our response will be proportionate to:

- the potential risk to consumers caused by a failure on behalf of the business to understand the information/advice provided,
- the experience of the business in question, and
- the impact upon the economic prosperity of the business or its competitors in not achieving compliance in the respective area(s) of the law.

We will prioritise requests for advice from new businesses and Home/Primary Authority businesses.

The Service reviews all information and advice it provides to consumers and businesses on an annual basis. This is with a view to signposting customers to the most appropriate source of online information available to enable self-service and assisted service. This work will continue in 2017-18.

Animal feed and food service requests will be handled by virtue of the projects detailed below. Anticipated resource requirements are based on the service request numbers received in previous service years, the nature of those service requests and the level of enforcement response required.

The number of food service requests is anticipated to be 216 and the number of agriculture service requests is anticipated to be 600.

At the time of writing this plan this Service has agreed to deliver a number of hours of advice under two Primary Authority Partnerships. One business is a pet food manufacturer whilst the other is an association of Farm Shops and Markets. These hours have been included in the resources below. As the Service's Primary Authority offer to businesses is developed it is most likely, given the local business demography, that further food and feed resources will need to be committed.

Project Name	Project Description/Outcomes	Staffing/Other Resources*	
		2016/17	2017/18
Business Advice	To provide enforcement and compliance information and advice in relation to agriculture (animal feed, feed hygiene, pet food, fertilisers) and food in response to requests from businesses. Analysis will be undertaken to identify further proactive work, identify trends and report on significant outcomes and impacts.	0.35 FTE (feed)	0.40 FTE (feed)**
		2.00 FTE (food)	2.05 FTE (food)**
*Excluding managerial, administrative and legal support			
**Includes agreed hours of advice to be delivered under two Primary Authority Partnerships			

3.5 Animal Feed and Food Sampling

The Trading Standards Service's Food and Feed Sampling Policy is annexed to this Plan.

The Trading Standards Service targets its proactive sampling at locally produced animal feed and foods, those products/ingredients from companies that manufacture in, are based in, or import into Norfolk. In line with a letter from the FSA (ENF/E/08/061) the Service is committed to ensuring that at least 10% of all food samples are of foods imported into the European Union.

In addition, animal feed/foods are targeted which are causing current concerns. These are identified through communication with the Food Standards Agency (FSA) and the Department of the Environment, Food and Rural Affairs (Defra); through local, regional and national intelligence held by local authorities; and through consultation with the Public Analyst. The Service's sampling programmes therefore include projects run in conjunction with the Food Standards Agency (FSA), the Chartered Trading Standards Institute (CTSI) and the East of England Trading Standards Association group of local authorities (EETSA).

Listed overleaf are sampling surveys that will be carried out in 2017-18. This list will be added to as, for example, intelligence identifies other animal feed/food that should be targeted. At the time of writing this plan the service planning cycle for food and feed sampling has not been concluded and further surveys will be added as a result of this process.

All sampling by officers is, wherever possible, taken in accordance with relevant legislation and all formal animal feed and food samples are taken in accordance with the Feed Law Code of Practice (England) or the Food Law Code of Practice (England) as applicable.

Samples are analysed and/or examined by the Service's nominated Public/Agriculture Analyst in accordance with the procedures laid down in the Food Safety (Sampling and Qualifications) Regulations 2013, the Food Law Code of Practice (England) and the Feed Law Code of Practice (England). Alternatively some samples are examined/tested in house, if it is appropriate to do so.

The Public/Agriculture Analysts appointed by the Authority are employed by Public Analyst Scientific Services Ltd (PASS).

Project Name	Project Description/Outcomes	Staffing/Other Resources*	
		2016/17	2017/18
Agricultural Sampling	To undertake animal feed and fertiliser sampling to ensure compliance in relation to composition, safety, hygiene and labelling.	0.80 FTE £15,000 Purchase and analysis costs	0.80 FTE £15,000 Purchase and analysis costs
Surveys under the sampling project will include: <ul style="list-style-type: none"> • Feed materials which are the subject of a complaint to the Service • Imported feeds/ingredients that have been the subject of feed hazard notifications • Finished feed for the presence of carryover veterinary medicines 			
Food Sampling Programme including Food Safety and Public Health	Targeting food sampling at areas identified as causing the most harm to consumers in terms of food safety, quality or nutritional standards	1.30 FTE £33,000 Purchase and analysis costs	1.30 FTE £33,000 Purchase and analysis costs
Surveys under the sampling project will include: <ul style="list-style-type: none"> • Sampling during the investigation of complaints • Sampling during the investigation of food fraud • Foods produced in Norfolk or imported by Norfolk based businesses • Foods imported from outside the EU as identified by Food Standards Agency priorities • Foods sold online • Meat speciation in meat products or preparations • Undeclared allergens in non-prepacked foods • Nutrition and Health Claims 			
* Excluding managerial, administrative and legal support			

3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease
Food poisoning notifications do not usually fall within the remit of the Trading Standards Service. If, however, the Service becomes aware of any incident of food poisoning or infectious disease, the facts will be reported to the appropriate authority.

3.7 Animal Feed/Food Safety Incidents
On receipt of any animal feed or food alert, the Trading Standards Service will respond as directed and as appropriate and in accordance with the Feed Law Code of Practice (England) or the Food Law Code of Practice (England).

The Food Standards Agency issues a “Product Withdrawal Information Notice” or a “Product Recall Information Notice” to let local authorities and consumers know about problems associated with food. In some cases a “Food Alert for Action” is issued which requires intervention action by enforcement authorities. 88 food alerts were issued by the FSA in 2016 (January to December), two of which were for action by Local Authorities. The FSA also issued 93 allergy alerts. The FSA also requires action through the issue of letters to enforcement authorities (ENF letters). These alerts and letters from the FSA resulted in the Service

undertaking activity relating to food brokers and sampling of meat for undeclared meat species.

During 2016, as a result of sampling activity, the Service raised two food incidents with the FSA. These included a product that stated it was free from allergens (wheat and celery) when it was not, a product containing undeclared additives and high levels of acrylamide in crisps.

Feed alerts are far less frequent than food alerts and we have not been involved in any feed alerts issued by the FSA during 2016. We continue to liaise with the FSA with regard to raising feed incidents relating to businesses in our area. In these instances we have directed the businesses to raise the incident directly with the FSA. This improves the speed and effectiveness of response given the nature of feed incidents. During 2016 (January to December) the Service was involved in 6 feed incidents with the FSA in such a manner. These included matters relating to salmonella in feed materials and one incident of feed containing meat and mammalian bone meal.

It is estimated that, for the coming service year, 0.10 FTE will be required for feed/food safety incident work.

In cases where the Service receives reports of chemical contamination of food and there is a subsequent threat to human health, it will liaise with the appropriate district council environmental health department, with a view to taking over responsibility for the case, or for undertaking a joint investigation, as the situation demands.

3.8 Liaison with Other Organisations

The Trading Standards Service works with a wide range of organisations, to varying degrees of formality, in carrying out its animal feed and food law enforcement function. These include the Food Standards Agency (FSA), the Department of Health (DH), the Department of Environment, Farming and Rural Affairs (Defra), the Animal Medicines Inspectorate (AMI), National Trading Standards (NTS), the other ten local authority Trading Standards Services in the East of England (EETSA) and District Council Environmental Health Departments.

The Service maintains a strong commitment to the regional work of EETSA and officers from Norfolk contribute to the EETSA Food Group and the EETSA Agriculture Group with both groups being chaired by a Norfolk officer. Via quarterly meetings and regional Knowledge Hub groups, the Service aims to ensure that local food and feed enforcement activity is consistent with neighbouring authorities. The Service participates in the national Food Focus Group facilitated by ACTSO.

The Service also ensures co-ordination with Environmental Health Departments, the Meat Hygiene Service and the Health Protection Agency through the Norfolk Food Liaison Group (NFLG) set up to co-ordinate activities as per the Food Law Code of Practice (England).

The Service liaises with Norfolk County Council Public Health to coordinate its food activities in line with Public Health priorities and initiatives.

The Service is fully committed to working with the Food Standards Agency on its Regulating Our Future programme, to determine a future delivery model for official food controls. The Head of Trading Standards is a member of the Expert Advisory Panel of Regulators, which has been and will continue to be consulted throughout the programme.

The estimated staffing resource to be allocated to liaison work during the year is 0.30 FTE.

3.9 Animal Feed and Food Safety and Standards Promotional Work, other non-official Controls and Interventions

Animal feed and food safety and standards promotional work for the year is linked to the results of our sampling and other enforcement projects, to any relevant prosecutions, and to information provided by our enforcement partners, primarily the Food Standards Agency (FSA). Promotional work consists of postings on our website www.norfolk.gov.uk/tradingstandards; including scam alerts, postings via our twitter feeds and Facebook pages and regular press releases, locally, regionally and nationally.

Information and intelligence gathering work is carried out by feed and food officers as part of their ongoing duties. Information and Intelligence is also gathered and analysed by our intelligence analyst and technical support staff in the Intelligence and Legal Enforcement Team. Such work informs our control strategy, tasking and coordination function and our service planning cycle.

Resourcing details are provided in the table overleaf.

Project Name	Project Description/Outcomes	Staffing/Other Resources*	
		2016/17	2017/18
Promotional Work, Intelligence Gathering	Promotional work including results of market surveillance, enforcement projects, prosecutions and information dissemination. Promotion will include use of our website, social media pages and feeds, local, regional and national press releases and liaison with media organisations.	0.05 FTE (feed)	0.05 FTE (feed)**
	Intelligence gathering work will include complaints and information monitoring, review of local, regional, national and international data to inform market surveillance and enforcement activity.	0.05 FTE (food)	0.05 FTE (food)**
*Excluding managerial, administrative and legal support			
**Intelligence gathering work also undertaken by Intelligence and Legal Enforcement Team.			

Section Four: Resources

4.1 Financial Allocation

The net budget for the Trading Standards Service for 2017/18 is £1,853,340. A breakdown of the Trading Standards budget for feed and food enforcement is shown below:

	2016/17 Projected Outturn (tbc)	2017/18 Estimate
Staffing	Total BFF: £485,410 Food & Feed: £272,015 (based on 6.45 FTE)	Total BFF: £489,860 Food & Feed: £274,509 (based on 6.45 FTE)
Sampling budget (Food & agriculture purchase and analysis)	£48,000	£48,000*
Subsistence/car allowances and travelling	Total TS: £41,958 Food & Feed: £5,932 (based on 6.45 FTE)	Total TS: £44,320 (profiled budget) Food & Feed: £6,266 (based on 6.45 FTE)
<p>*At the time of writing this plan the Service is proposing to apply for grant funding for feed/hygiene audits and feed sampling to supplement the 2017/18 sampling budget. The results of any grant bid will affect surveys proposed in 3.5 above. The grant funding for 2017/18 is not yet approved but should be comparable to the funding for the current 2016/17 year which is projected to total £46,092 for:</p> <ul style="list-style-type: none"> • Feed/hygiene audits = £33,372 • Feed sampling = £12,720 <p>As a result of a national review the FSA has yet to confirm if any food sampling grants will be available for 2017/18.</p>		

The relative amounts allocated to food and feed law enforcement are based on the staff allocation breakdown given in Section 4.2.

4.1.1 The Food Law Code of Practice requires the Service to inspect its food businesses over a prescribed cycle. In addition to the inspection of all high risk businesses and other interventions detailed in this plan, the expectation is that all medium risk businesses will be inspected every 2 years and that an inspection or alternative enforcement strategy be undertaken at low risk premises once every 5 years.

The situation with regard to feed businesses is slightly different. In addition to the inspection of all higher risk feed businesses and other interventions detailed in this plan the expectation of the Feed Law Code of Practice is that all businesses will be inspected on a risk based inspection programme. Those not of the highest risk (i.e. scored from 2-5) will have an inspection schedule ranging from 2 to 5 years in frequency (i.e. matching their score).

The Service has determined that, if it were to conduct the routine feed and food inspection programme detailed above, the following resource would have to be

redeployed from other enforcement activities, such as fair trading, animal health & welfare or product safety work:

Food Business Inspections:	• Medium risk	4.90 FTE
Food Business Alternative Enforcement Strategies	• Low risk	0.17 FTE
Feed Business Inspections:	• Grouped Medium risk	3.02 FTE
	• Grouped Low risk	0.68 FTE

However, mindful of the recommendations of the Hampton and Macdonald Reviews which state the Service should only carry out inspections of businesses where there is a clearly identified risk presented by that business, the Service will, as in previous years, conduct intelligence-led inspections or other interventions within those business sectors or at those food/feed business operators presenting the highest risk to the food chain and consumers/other legitimate businesses. A flexible approach to resourcing enables us to respond appropriately to incidents and our local approach to risk assessment and effective targeting of resources, rather than the conduct of a routine inspection programme, will provide the necessary protection to the County's food chain.

- 4.1.2 The County Council has invested in an ICT modernisation programme, Digital Norfolk Ambition, which has resulted in all operational staff (including all feed and food officers) in the Service receiving a new laptop with enhanced functionality. The Service continues to invest in modern ICT systems and provides its annual Local Authority Enforcement Monitoring System (LAEMS) return via a direct download to the FSA. Access to the Internet, to the APP Civica database and to other information systems is seen as a vital resource for operational staff. The Service uses the UK FSS iNet database for recording, managing and submitting food and feed sampling data.

All food and feed law enforcement officers have been issued with mobile telephones and digital cameras. All officers have been issued with laptop computers. The Service does not have an individual budget for ICT as such matters have now been transferred to corporate funding.

- 4.1.3 No fixed amount is set aside for legal costs with specific regard to food and feed law. However a general legal cost header is allocated to the budget, the budgeted amount for 2017/2018 being £58,000.

4.2 Staffing Allocation

The current staffing allocation to food and feed enforcement has been calculated on the basis of the projects/activities described in Section 3 above as summarised and unless otherwise stated FTE figures quoted relate to competent staff:

Plan Section	Project/Activity	FTE			
		2016/17 Feed	2016/17 Food	2017/18 Feed	2017/18 Food
3.1	Feed Hygiene & Standards Inspection Programme	0.25		0.25	
3.1	Inspection of high-risk food businesses		0.90		0.80
3.2	Complaints and Referrals	0.05	0.30	0.05	0.30
3.4	Business advice	0.35	2.00	0.40	2.05
3.5	Agricultural sampling	0.80		0.80	
3.5	Food Sampling Including Public Health Initiatives		1.30		1.30
3.7	Food/feed alerts		0.10		0.10
3.8	Liaison including Public Health Initiatives	0.15	0.15	0.15	0.15
3.9	Promotional Work, Intelligence Gathering (including non-qualified staff)	0.05	0.05	0.05	0.05
	Subtotal:	1.65	4.80	1.70	4.75
	Total:	6.45		6.45	

4.3 Staff Development Plan

The Service focuses on the needs of both specialist feed and food law enforcement officers and other staff in terms of their training and continuous professional development (CPD).

The current training arrangements are reflected in the Staff Development Framework and the Learning and Development Plan. The Service has invested in supporting a number of members of staff to study for the Diploma in Consumer Affairs and Trading Standards (DCATS).

Skills and competency are assessed on a four-monthly basis at annual staff appraisals and 1-2-1 meetings and a programme of continuous professional development is implemented to ensure the maintenance of essential knowledge and skills.

The Food Law Code of Practice England (2015) lays down new competency demonstration requirements for food officers which took effect from 1 April 2016. The Service has taken steps, including the provision of additional time and resources, to ensure the new requirements are met.

Section Five: Quality Assessment

5.1 Quality Assessment and Internal Monitoring

The following arrangements will be used to assess the quality of the Authority's service:

- All procedures and work instructions relating to feed and food law enforcement are subject to established in-house quality improvements and auditing procedures which apply to the whole of the Trading Standards Service
- Evaluation surveys sent out to a sample of businesses following an inspection or request for advice
- Review of a random number of inspections, service requests and complaints by section manager/line managers
- Programme of peer review at inspection for feed/food officers. Areas of good practice and improvement are anonymised, collated and fed back to officers as a group
- Feedback at 1-2-1 meetings, midyear review and appraisal on individual performance
- Feedback at monthly team meetings

Section Six: Review

6.1 Review Against the Service Plan

The Service uses a performance measurement toolkit and database (PRISM) to collate, report and review performance on a monthly basis.

At monthly intervals the Trading Standards Management Team undertakes a performance review. The meeting includes recognition of any variance from target, the reasons for variance and any appropriate measures to be put in place to address such variance.

At the same meeting the Trading Standards Management Team also reviews progress against our Control Strategy Priority Action of "Ensuring the standards, quality and safety of the food chain, including food, animal feeds and agricultural fertilisers". This action includes the provision of business advice, liaison with regulatory and business partners, intelligence led market surveillance and enforcement activities, including risk based inspection and sampling.

The allocation of suitable resources to tackle any emerging food or feed issues or trends can be raised for consideration by the Trading Standards Management Team at the monthly Tasking and Coordination meeting.

Information on performance measures and targets is set out on pages 2, 3 and 6 of the Trading Standards Service Plan 2017-18.

6.2 Identification of any Variation from the Service Plan

As outlined in 6.1 above the Service, on an ongoing basis, monitors its performance using the above means and takes action to address variance from target throughout the year.

6.3 Areas of Improvement

The Service is committed to addressing areas of improvement highlighted by the ongoing quality assessment and internal monitoring as outlined in 5.1 above and the monthly reporting as outlined in 6.1 above.

Food and Feed Sampling Policy

Background

The Trading Standards Service priorities are:

- **Enabling** economic growth by providing support for businesses and ensuring a level playing field by tackling the most serious illegal trading
- **Safeguarding** communities and vulnerable people by engaging with communities and businesses to build resilience to scams and rogue traders
- **Protecting** public safety, health and well-being and ensuring trading is legal, honest and fair

Introduction

This policy outlines our general approach to the sampling of food and animal feed. This policy is produced in accordance with the Service's obligations under the Framework Agreement on Official Food and Feed Controls and the respective Food and Feed Codes of Practice.

Policy

This Service recognises that sampling and analysis is an essential part of food and feed standards enforcement, which enables authorised officers to assess compliance with food and feed standards, composition, safety and labelling requirements. This includes using sampling and analysis as part of proactive market surveillance and reactive responses to complaints.

The Service is committed to maintaining a contract with a suitably qualified Public/Agriculture Analyst for the analysis of formal food and feed samples.

On an annual basis we will formulate and commit resources to a sampling programme for food and animal feed products. This programme will be developed taking into account factors including the nature of the food and feed businesses in the County, our intervention plan, Home/Primary Authority functions, the Food Standards Agency (FSA) food and feed priorities and other available local, regional and national intelligence pointing to areas of most concern. We will also develop our sampling programme in consultation with the Service's appointed Public/Agriculture Analyst.

This Service is committed to participation in national and regional sampling surveys where proposed sampling/analysis fits in with the above mentioned factors.

Although developed as an annual programme, this Service will continue to monitor intelligence for emerging issues and will change or amend the sampling programme as necessary.

This Service will target its proactive sampling at locally produced animal feed and foods, those products/ingredients from companies that manufacture in, are based in

or import into Norfolk. In line with guidance issued by the FSA this Service is also committed to ensuring at least 10% of all food samples are foods imported into the European Union.

All formal food and feed sampling will be taken in accordance with the Food Law Code of Practice (England) or the Feed Law Code of Practice (England), as applicable. All formal samples are analysed and/or examined by the Service's nominated Public/Agriculture Analyst in accordance with the applicable legislation. Officers who take formal samples will be suitably qualified and competent to do so in accordance with the respective Food and Feed Codes of Practice.

Where it is the case that informal samples are taken by officers, wherever it is possible, these samples shall be taken in accordance with relevant legislation.

All food/feed samples and the result of examination/analysis will be recorded. Food and Feed Business Operators will be notified of both the samples taken and the results of analysis. Where sample results are considered to be unsatisfactory, the Service will take appropriate action to ensure compliance is achieved. Any action will be carried out in accordance with the CES Enforcement Policy.