

DIRECTORATE OF COMMUNITY & NEIGHBOURHOOD SERVICES

FOOD LAW ENFORCEMENT SERVICE PLAN 2010/11

FOREWORD

Under Food Standards Agency's Framework Agreement, City of York Council is required to produce an annual service plan that covers their various food functions.

The food team, which is part of the food and safety unit, is responsible for food law enforcement. This service plan reviews our performance over the last year, sets out our aims and objectives for 2010/11, and also looks at what demands are placed on the team and what resources are available to meet those demands.

Variance between the 2009/10 planned and actual performance is highlighted. Where necessary, corrective action is recommended and incorporated into the 2010/11 plan.

Resources in the team are limited. However, this plan illustrates the effective use of existing resources to target the highest risk food businesses, while maintaining a balanced enforcement mix.

1. SERVICE OBJECTIVES, AIMS AND POLICIES

1.1 The vision of the Environmental Health and Trading Standards is:

To deliver the highest standards of protection of health, environmental and economic well-being to the people of York, through the provision of a quality customer focused service.

1.2 The Objectives of Environmental Health and Trading Standards are to:

- Protect residents and local businesses from unfair and unsafe business practices
- Protect residents and our environment from pollution and other public health and safety hazards
- Help local businesses achieve compliance with their legal obligations
- Promote healthy living in the city
- Reduce noise nuisance and make an effective contribution to reducing anti social behaviour in York

1.3 The Aims the Food Enforcement Team are:

- To operate a comprehensive regime of interventions (eg inspections), sampling, advice and other methods as appropriate, to ensure the safety, correct composition, description and labelling of foods and animal feeding stuffs and prevent adulteration and fraud in the production and sale of these products.
- To ensure the health and well-being of consumers by the above methods and through promotional activities.
- To promote best practice in food and animal feeding stuffs production and sale in the City of York.
- To provide support, assistance, training and advice to local businesses, thereby enabling them to market products that comply with legal requirements and best practice.
- To investigate cases of communicable disease notified to the Authority.
- To promote food safety and standards issues to the public through a variety of activities.
- To investigate complaints about the labelling, composition, safety and fitness of food, feeding stuffs and the operation of food premises.
- To act as a home authority and originating authority and deal with enquiries referred by other agencies.
- To approve and register food premises as prescribed by government.

- To enforce the provisions of food and animal feeding stuffs legislation, and take appropriate and proportionate action to secure compliance.
- To take prompt and effective action in response to food hazard warnings and other threats to food safety in York.

1.4 Corporate priorities of the Service

City of York Council has a corporate strategy for the period 2009 – 2012, which incorporates eight priorities. In terms of these priorities, the food team contributes to making York a Thriving City, a Safer City and Healthy City, through improving the health and lifestyles of the people who live in York, in particular among groups whose levels of health are the poorest.

1.5 Links to Community Objectives

York's Local Strategic Partnership, Without Walls, reviewed York's Local Area Agreement (LAA) in 2008 to reflect new government guidance. As part of this review a number of priorities and local improvement targets were decided. The food team formed a partnership with other service providers to submit a bid for LAA funding. The bid focused on tackling the levels of obesity among primary school age children in year 6. The bid was successful and the food team are delivering a number of workshops to raise awareness and understanding about healthy eating. This work runs until April 2011.

1.6 Enforcement Policy and Customer Service

The team operates to an enforcement policy that meets the needs of the Statutory Code of Practice for Regulators'. In addition, we have implemented a "Customer Service Standards" policy, which sets out the minimum service standards we aim to achieve when providing our services.

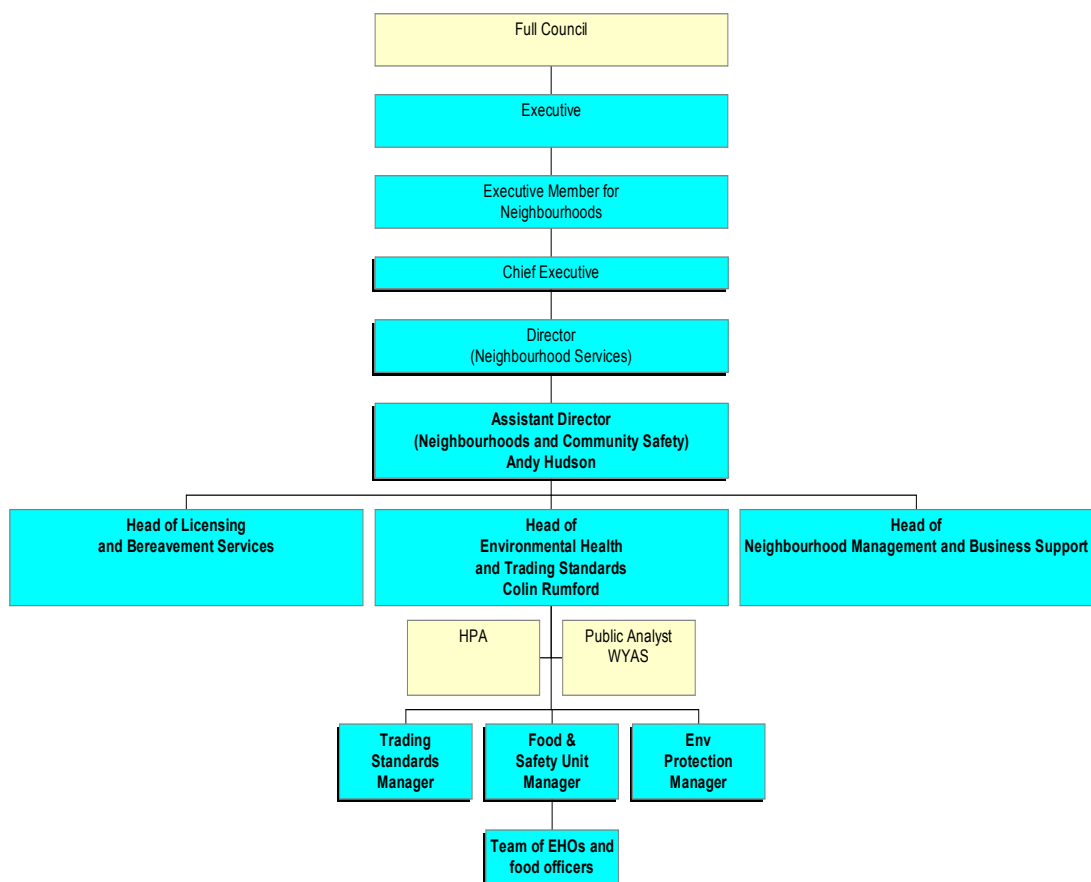
2. BACKGROUND

2.1 Profile of the Local Authority

City of York Council is a unitary authority, with a population of approximately 193,000 and an area of 105 square miles (27,250 hectares). The majority of the electorate (60%) are located in the urban city area, with the remainder resident in the outlying towns and villages.

The area is predominantly urban, covering the historic city with the associated tourism, hospitality and catering activities.

2.2 Organisational Structure



2.3 Provision of Specialist services

- Public Analyst services covering food and animal feeding stuffs are provided under contract by West Yorkshire Analytical Services, Morley, Leeds.
- Microbiological food examination is carried out under service level agreement with the Health Protection Agency (HPA) laboratory service, based in Leeds.
- The proper officer for communicable disease purposes is the Consultant in Communicable Disease Control at the HPA.

2.4 Scope of the Food Team

As a unitary authority, City of York Council is responsible for the full range of food law enforcement activities.

The food team has responsibility for food safety, food standards, animal feeding stuffs and primary production activities. The team is part of Environmental Health and Trading Standards, which sits within the Communities and Neighbourhoods Directorate

The team comprises of both environmental health and trading standards professionals, in addition to technical support staff. Some officers have dual qualifications and the team also carries out health and safety checks in food premises.

The service consists of:

- A programme of food and feeding stuffs interventions.
- Investigation of consumer complaints.
- Investigations of food poisonings/infectious disease notifications.
- Promotion and education/advice for businesses and the public.
- Health improvement promotion (e.g. healthy eating awareness).
- Sampling of food and animal feeding stuffs according to annual targeted programmes.

2.5 Demands on the food team

The authority's area contains a mix of manufacturing, retail and catering premises; hospitality and catering are the dominant sectors. There is a large international confectionery manufacturer, a district hospital, various large academic institutions and a racecourse.

The profile of food premises in York is heavily biased towards restaurants and caterers, which is a reflection of the city's status as a major tourist destination. We have seen a rapid turnover of business ownership in this sector, which has placed a strain on the team in terms of premises inspection, advice provision and maintaining an accurate premises database.

Under the product specific or "vertical" EU Directives, there are two premises that are approved by the food team.

Additionally, the team acts as "home authority" for the businesses that have a base in the City, but trade regionally or nationally. Under this role we provide a link between other food authorities and the companies, resolving issues where appropriate.

Local customer consultations carried out in 2009, via the "Talk About" residents' panel, indicate that food remains a concern for residents. Indeed, out of all the functions performed by environmental health and trading standards services, respondents thought that inspecting food businesses was the most important function we perform.

This view echoes the findings of the FSA's 2005 consumer attitudes survey that found that 60% of respondents were concerned about hygiene in catering outlets. The FSA survey showed that the top 4 consumer concerns about food were the amount of salt in food, the amount of fat in food, food poisoning, and the amount of sugar in food respectively.

Consumers were found to be increasingly concerned about the accuracy of food labels, which appears to be part of an increasing awareness and concern about healthier eating. The level of comprehension of food labels by consumers has not improved and remains quite low.

The team will continue to respond to the issue of obesity/healthy by working to deliver against the Local Area Agreement improvement targets for levels of obesity in year six children.

2.6 PREMISES PROFILE

The high proportion of restaurants and takeaways in York means that officers are often required to work out-of-hours in order to gain access to these premises. Officers must also be sensitive to the needs of ethnic minorities. In the past the team has been the subject of an equalities impact assessment, leading to a number of service improvements, including the provision of food hygiene training tailored and made accessible to Turkish, Chinese and Indian restaurants operators/employees.

Table 1 - Breakdown of food premises by FSA category as at 1 April 2010.

FSA CATEGORY	Number
Primary Producer	7
Manufacturer & Packer	46
Importer/Exporter	3
Distributor/Transporter	20
Retailers Other	81
Restaurants/Cafe/Canteen	328
Supermarket/Hypermarket	42
Small Retailer	235
Hotel/Guesthouse	187
Pub/Club	235
Takeaway	167
Caring Establishment	143
School/College	91
Mobile Food Unit	44
Restaurant/Caterers – Other	175

2.7 SERVICE DELIVERY POINT

The service is delivered from an office based in De Grey House, Exhibition Square, York. The hours of operation are 08:30 -17:00 Monday to Friday, although officers work outside of these hours as where necessary.

2.8 REVIEW OF INTERVENTIONS CARRIED OUT FROM THE 2009/10 PROGRAMME

2.8.1 FOOD HYGIENE INTERVENTIONS

Premises rating	A	B	C	D	E
No. of planned interventions at 1/4/2009	9	122	471	72	262
No. of interventions achieved	9	122	468	71	245
No. of interventions <u>not</u> achieved	0	0	3	1	16

In addition to the above figures, 56 unrated premises were subject to interventions during the year. These are newly registered food premises that are required to receive an inspection and be risk-assessed.

Interventions were carried out at 100 % of our category A and B premises and 99% of our category C premises (the Local Performance Indicator is 100%). These figures are very similar to our performance last year and we aim to maintain our intervention performance at this level.

The lowest risk premises in category E do not receive physical visits, unless we receive intelligence, such as a complaint, that there may be problems at the premises. These premises are assessed by alternative approaches, such as issuing a questionnaire.

2.8.2 FOOD STANDARDS INTERVENTIONS

Premises Rating	High	Medium	Low
No. of planned interventions at 1/4/2009	10	757	428
No. of interventions achieved	10	318	111
No. of interventions <u>not</u> achieved	0	439	317

We achieved a 100% intervention rate for our high-risk food standards premises. Due to having a limited number of staff, we were only able to carry out interventions at 42% of our medium premises. We focused our limited resources on our high risk and unrated premises

As with food safety interventions, the lowest risk premises are not programmed to receive physical visit.

2.8.3 Feeding Stuffs/Primary Production Interventions

During 2009/10, we outsourced this area of work to a neighbouring authority. The authority visited 55 of our registered animal feed premises were due for an intervention that year (100 % intervention rate). The authority also carried out primary production interventions at 45 premises. These primary production visits were combined with animal feed visits where possible.

2.8.4 Alternative Enforcement Strategies (AEA)

As mentioned, we do not have a programme of physical visits for our lowest risk premises.

A risk assessment framework determines the frequency at which food premises are visited. In order to direct our resources away from low risk premises, we do not include them in our annual programme of interventions. Instead, these businesses receive a questionnaire, which seeks to check that the businesses remains low risk, whilst providing information relevant to food law. There are a number of advantages to this arrangement, not least the fact that officers can concentrate on those premises which pose a greater risk or where the service can have a greater impact.

In 2009/10, the team issued 246 food safety AEAs. No food standards AEAs were issued as the teams resources are being used to focus on higher risk premises.

3. PLANNED ENFORCEMENT ACTIVITY 2010/11

3.1 FOOD SAFETY INTERVENTIONS

Premises rating	A	B	C	D	E	Unrated
No. of premises due an interventions	11	78	517	46	273	73*
No. of programmed interventions	22	78	517	46	273	73

* - This is the number of unrated premises at the start of the year. There will be more premises during the year as new businesses open etc.

3.2 Food Standards Interventions

Premises rating	A	B	C	UNRATE
No. of premises due an intervention	5	578	561	177
No. of programmed interventions	5	-*	-*	177

* - For 2010/11 we are focusing our resources on intelligence led project work.

Feeding Stuffs/Primary Production Interventions

A total of 31 programmed animal feed interventions are due to be carried out this year. As with last year, we are outsourcing this work. Where appropriate, we will incorporate primary production hygiene interventions to reduce the burden on farms in line with Hampton principles.

3.4 Food and Feeding Stuffs Sampling

The team will sample foods and feeding stuffs in accordance with its documented policy. We will also participate in national LACORS/HPA sampling programmes and fulfil any requirements to sample those premises approved under the product specific regulations.

Both the food standards and feeding stuffs sampling programmes have been produced in consultation with the Authority's public analyst/agricultural analyst. The food standards team co-operates with other regional authorities to coordinate sampling initiatives, such as imported food, so as to avoid duplication and to optimise the statistical soundness of results data.

We are currently recording our food standards results on the national Food Surveillance System. It is our intention to also record our food safety samples on this system once some IT compatibility issues have been resolved.

3.4.1 Food and feeding stuffs sampling programme

	2008/10 Samples Programmed	2009/10 Samples Taken	2010/11 Samples Programmed
Food standards samples	120	108	120
Feeding stuffs samples	5	8	5
Food safety samples	228	286	226

3.4.2 Comments on sampling performance

Sampling is an important tool for food standards, food safety and animal feed.

The food safety team is primarily concerned with the microbiological safety of food, but also samples food to establish the nature and likely harm arising from foreign bodies and the like.

The sampling programme tends to focus on areas of past non-compliance, premises that are failing to meet minimum standards and emerging priorities such as butchers and food at large outdoor events.

Each year the Health Protection Agency undertakes microbiological analysis of the samples we provide, most of which are done without charge under a credits system. Of the 286 samples taken last year, 25 (8%) were found to be unsatisfactory. The samples covered a range of products and premises.

Our food standards samples look at the description, composition and labelling of food, to ensure that legal requirements are being met. Samples are normally targeted at areas where problems are regularly found, or where intelligence, such as complaints, suggests there could be issues.

Of the 103 food standards samples taken in 2009/10, 42 (40%) were unsatisfactory. Enforcement action was taken due to under strength or substituted spirits. However, in most cases, such as compositional or labelling problems, our findings have been passed to the Home Authority for the companies concerned.

Of the 8 feeding stuffs samples taken in 2009/10, 1 (12%) was unsatisfactory.

3.5 Education and Information Programme

3.5.1 Advice to Businesses/Customers

The team provide all reasonable support and assistance to businesses operating or intending to operate in the City of York area.

It is estimated that the team will receive over 400 requests for advice this year, some of which will require a visit to the business premises. Advice is often requested by prospective businesses seeking advice before they commence trading. The recession does not seem to have affected York's food sector, as we are seeing many new premises opening and new business proposals being considered. We also receive a large number of requests for advice from businesses interested in improving their 'scores on the doors' star rating.

3.5.2 Food Team Promotional and Project Work

The team will continue to raise consumer and business awareness of food matters by means of a programme of talks, press releases and other promotional activity.

We continue to work in partnership with other service providers to tackle the level of obesity in Year 6 students. Funding secured through the Local Area Agreement is allowing us to deliver a programme of healthy eating workshops in schools.

Last year we took part in national Food Safety Week, which focused on the sharp rise in cases of listeria, particularly in people over 60. To target this group, we circulated promotional material to sheltered housing schemes and luncheon clubs. Free thermometers were also provided, as food stored at the wrong temperature can allow listeria, if present, to grow.

This year's food safety week focuses on Campylobacter, which is the most common form of food poisoning in the UK. We are planning a sampling programme that will focus on foods that are known to be high risk in terms of campylobacter, such as chicken liver pate. We will also plan to raise awareness of the issue through press releases etc.

4. ENFORCEMENT ACTIVITY

4.1 Formal Action Taken

The following tables summarise the level and types of formal enforcement action taken in 2009/010. We believe that to be effective, the full range of enforcement options should be used, from informal letters offering advice, through to prosecutions where this course of action is considered appropriate.

Food Safety

TYPE OF ACTION	NUMBERS TAKEN/ISSUED 2008/2009	NUMBERS TAKEN/ISSUED 2009/10
Prosecution	6	2
Simple Caution	4	3
Prohibition Notice	0	0
Hygiene Improvement Notice	84	47
Formal written warning *	5	5

* – These are written warnings issued by CYC to businesses where prosecution is not the most appropriate course of action. They are not written warnings as defined by the FSA.

Food Standards and Feeding Stuffs

TYPE OF ACTION	NUMBERS TAKEN/ISSUED 2008/2009	NUMBERS TAKEN/ISSUED 2009/10
Prosecution	0	0
Simple Caution	7	3
Formal Written Warnings	19	19

Last year we prosecuted two businesses for food hygiene offences – a takeaway and a restaurant. Both premises had failed to improve standards, despite the service of hygiene improvement notices. The takeaway premises is under investigation again due to further issues, and the restaurant has been sold and is under new ownership.

In the summer of 2008, we implemented a strategy to focus our resources on improving premises that are not broadly compliant with food hygiene law. Under this strategy, we are issuing hygiene improvement notices where advice and education fail to secure improvements. This approach is proving to be effective as the percentage of premises that are not broadly compliant is starting to drop.

An area where our food standards officers continue to find problems, is alcoholic drinks that are either under strength or falsely described. Under strength drinks are often connected with the use of open top pourers on spirits, which allows the evaporation of

alcohol and we are looking to raise awareness of this issue. Four simple cautions were issued for falsely describing alcohol.

4.2 Food Premises, Food and Feeding Stuffs Complaints

Investigation into food and feeding stuffs complaints is carried out in accordance with our quality management system procedures.

In 2009/10, 1050 complaints and requests for service were received. This high figure is consistent year-on-year, reflecting how busy the food sector is in York and the high awareness of food issues amongst our customers.

4.3 Home Authority & Primary Authority

City of York Council fully subscribes to the LACORS home authority principle, and currently has agreements with Nestle (for food standards in relation to confectionary). Our agreement with National Express East Coast for food safety is currently under review following the nationalisation of the line.

The team liaise with other local authorities about our national and regional companies. We support small/medium and new companies by giving advice on matters such as changes in the law. In 2009/10 the team received 26 referrals from other local authorities and a similar number can be expected in 2010/11.

We are committed to following the principles of the Primary Authority Scheme, where these relationships exist.

4.4 Control and Investigation of Outbreaks of Food Related Infectious Disease

The team investigate all food poisoning notifications and outbreaks of food borne disease in accordance with procedures agreed with North Yorkshire District Control of Infection Committee and our local quality procedures.

In 2009/10, the team received 400 formal notifications of infectious disease, although some of these related to mumps, rather than food poisoning.

4.5 Food/Feeding Stuffs Safety Incidents

It is the policy of the authority to handle all food alerts from the FSA in accordance with the FSA Code of Practice and our local quality procedure. Notifications are received from the FSA by e-mail and mobile phone, and an appropriate course of action is taken in each case.

The reactive nature of this task makes it difficult to estimate the likely level of activity. During 2009/10, 38 food alerts were received. Although alerts can be issued by the FSA for information only, some require a formal response. A formal response might involve issuing a local press release or contacting food businesses directly, which has resource implications.

The FSA also issue food allergy alerts - 46 were received last year.

It is expected that a similar or greater number of food alerts will be received in 2010/11.

5. OTHER AGENCIES - REFERRALS AND LIAISON

5.1 Liaison with Other Organisations

The team will ensure that it is operating in a manner that is consistent with both neighbouring and national local authorities and other agencies. Various methods will be used to facilitate this, including benchmarking, peer review and liaison with: -

North Yorkshire Food Liaison Group

This is a LACORS food liaison group working under the wing of the North Yorkshire Chief Environmental Health Officers Group. All eight North Yorkshire local authorities are represented on both of these groups. Of particular relevance is the food safety quality management system (QMS), which is accredited to the quality standard ISO 9001 (this is discussed later in Section 8 – Quality Assessment).

Yorkshire and The Humber Trading Standards Quality Standards Technical Group

Following a review of regional priorities, the Quality Standards Technical Group is now a virtual group.

A Food Fraud group has been established, which meets on a quarterly basis and seeks to promote best practice and consistency in food enforcement in the region. The group also considers emerging intelligence and looks at joint projects to detect food fraud across the region.

West Yorkshire Analytical Services

This is the Public and Agricultural Analyst for the City of York Council, used predominantly for food standards and animal feed analysis. They are contracted to provide these services to us for the next year.

Health Protection Agency

The HPA food laboratory, based in Leeds, undertake microbiological analysis of food samples on our behalf. Regular meetings are held to promote co-ordination and good sampling practice across the region.

North Yorkshire District Control of Infection Committee

This is a multi-disciplinary group of public health consultants, consultant microbiologists, environmental health officers, infection control nurses, general practitioners and associated professions. It meets on a quarterly basis to discuss infection control issues and set policies in relation to their investigation and control.

Planning/Licensing Sections

The list of all planning applications is seen by the team and plans requested where necessary, so that recommendations/conditions can be supplied.

The team liaises with licensing to ensure that an integrated approach to enforcement is followed.

5.2 Referrals to Other Organisations

Where the team receives a food related service request that does not fall within its enforcement remit or geographical enforcement area, it refers the person concerned to the correct body or forward the item of work to the relevant authority without delay.

6. CONSULTATION

We have reviewed the way in which we survey our customers. This has come about because of the new National Indicator 182 - *Business satisfaction with local authority regulatory services*. A programme is in place to send questionnaires to businesses, dependant on the outcome of the intervention. In accordance with the National Indicator, we must send questionnaires to a proportion of businesses that were found to be compliant and not compliant with food law.

We also survey our customers on a regular basis to ensure that we are providing a high quality, customer focused service. We have recently been awarded the Customer Service Excellence award, which demonstrates our commitment to providing a customer focused service.

7. RESOURCES

7.1 Financial Allocation

The overall level of financial allocation to food safety and standards enforcement activity for the year 2009/10 and 2010/11 is as follows:

	2009/10 Actual £k	2010/11 Estimate £k
Staffing costs	291.4	296.9
Support costs	121.2	121.2
Supplies & services (inc transport)	55.2	58.0
Analytical & sampling costs	8.4	12.6
Income	-38.6	-27.3
Overall Expenditure	437.6	461.4

7.2 Allocation of staff for 2010/11

Food Safety

- 3.5 Senior EHOs – fully competent to enforce food hygiene law.
- 1 Food Officer – holds environmental health degree, working towards EHORB registration.
- Contractors will be employed to undertake food safety interventions at low risk and broadly compliant premises.

Food Standards

- 0.8 Senior Food Officer – fully competent to enforce food standards law
- 1 Food Officer – fully competent to enforce food standards law

Animal feed inspections and hygiene at primary production level will be carried out by officers from a neighbouring authority.

The team is managed by the food and safety unit manager, lead officer for food safety and standards.

7.3 Staff Development Plan

Staff development needs are identified on an ongoing basis, through the team's quality management system. We also hold annual Performance Development Reviews with individual officers, where the training needs are considered in accordance with corporate policy. Identified training needs will be met by: -

- Training to achieve specific qualifications
- Attendance of technical seminars/courses
- In-house training on specific issues
- Cascade training by staff that have attended relevant courses.

Training records show that officers consistently achieve the required levels of CPD training required by the Food Law Code of Practice.

8. QUALITY ASSESSMENT

8.1 North Yorkshire Food Quality Management System

The food team operates within the North Yorkshire Food Liaison Group's quality management system (QMS)

The QMS, which is independently accredited to ISO 9001 standards, includes a rigorous system of controlled documents that state the minimum standards for our food enforcement activities. It includes internal monitoring within the authority and is further enforced by inter-authority auditing. The system is also subject to external monitoring by ISOQAR, an accredited certification body.

The system ensures the delivery of high quality enforcement activity across the City of York, which is consistent with the other North Yorkshire authorities and is in accordance with good practice. York's QMS was subject to external audits in 2004, 2006 and again in 2009. The auditor reported zero non-compliances following the latest audit.

The Environmental Health and Trading Standards service is also proud to hold the Customer Service Excellence award, which demonstrates our commitment to putting the customer at the heart of everything we do.

9. REVIEW OF PERFORMANCE AGAINST LAST YEARS SERVICE PLAN

The team performed very well in respect of its inspection targets for high and medium risk food hygiene premises.

In 2008/09, National Indicator 184 (NI 184) was introduced – “Food establishments broadly compliant with food hygiene law”. At the end of 2008/09 our figure for this indicator was 88%, which is lower than we had anticipated. This dip in performance came about because premises that were unrated at the end of the year (eg new premises due an inspection), were counted as being not broadly compliant with food hygiene law.

By the end of 2009/10, our figure for NI 184 had improved to 92%, which was the target set in the department's service plan. This improvement was due to us focusing on poorer premises, and taking a graduated approach to enforcement where advice/education was not successful in improving standards.

Our food standards officers focused on high risk and unrated premises during 2009/10 (al high risk premises were inspected). We continue to have a back log of overdue inspections in this area due to limited resources.

10. STRATEGY FOR 2010/11

For 2010/11 we will continue inspecting our high risk businesses, and premises not broadly compliant with food law in-house. We feel this makes the most effective use of our limited resources. Inspections of low risk and broadly compliant premises will be contracted out to agency staff, and followed up in-house where problems are identified.

Our approach of using a graduated enforcement approach with poor performing premises is proving to be effective in improving standards. We have also found that our scores on the doors scheme, launched in June 2009, has been an effective tool to encourage improvements.

There were an unprecedented number of unrated premises for us to deal with in 2009/10, which we struggled to inspect. We have put in place measures to ensure unrated premises are inspected in a timely manner during 2010/11.

Our Scores on the Doors scheme has been a great success, and provides an additional incentive for businesses to improve the way they operate. We are continuing with our own scheme, but will consider moving to the Food Standards Agency scheme once the full details are known.

We do not have sufficient resources to undertake all of our food standards inspections in accordance with the requirements of the Food Law Code of Practice. Therefore, we have decided that for 2010/11 we will inspect our high risk premises and undertake project work to focus on known issues (eg counterfeit alcohol). We will not routinely inspect our medium or low risk premises, unless we receive complaints or similar which indicate there is a problem.

In 2010/11 we will expand our version of the 'Retail Enforcement Pilot'. Food safety officers will take the lead for all REP inspections and will gather data for other regulatory teams as part of their visit. We feel this approach maintains the importance of food safety, whilst also making effective use of our resources and reducing the regulatory burden on businesses.

A programme of animal feed and primary production inspections are planned for 2010/11. These will be delivered on our behalf by an appropriately qualified and experienced officer from a neighbouring authority.