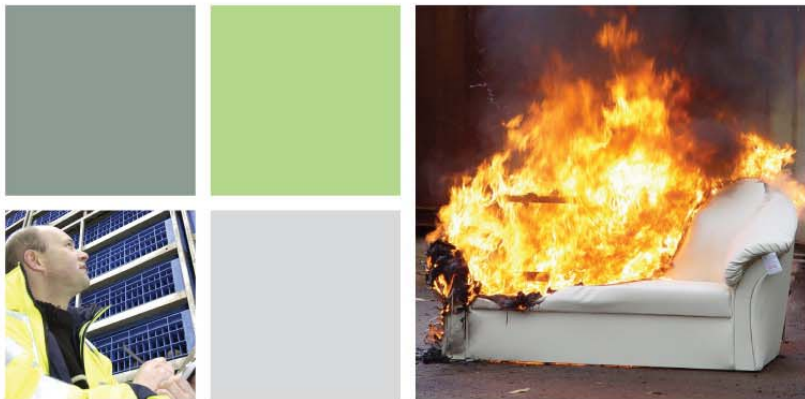




Suffolk Trading Standards Food Law Enforcement Plan 2006-2009 Public Protection



1. Introduction

The purpose of this plan is to ensure that the food safety service delivered by Suffolk County Council maintains and improves the standards of operation as set out in the Trading Standards Service plan. We will achieve this by ensuring that practices and products are safe and comply with relevant legislation, food production, processing and marketing are major industries in Suffolk. An extremely wide range of food and animal feedstuffs are produced requiring a high level of regulatory competence and activity to ensure relevant standards are maintained.

The Food Law Enforcement Plan 2006-2009 for Suffolk is detailed below and includes objectives, demands on the food service and issues including food complaints, inspections and sampling.

The 2006-09 Trading Standards Service Plan has been produced and includes links to corporate objectives and plans. The Service Plan puts into context what we are aiming to achieve. In particular the plan refers to the following:

- Our service aims
- Enforcement policy
- Service strategies
- Enforcement staff structure
- How to contact us
- Business Support Strategy
- Key outcomes for service delivery and improvement
- Key performance results.

2. Strategic Aims

The food team is responsible for undertaking the following duties:

- Carrying out programmed inspections of food premises and revisiting where necessary to check compliance with legal requirements.
- Where breaches of legal requirements are identified, we will take the necessary informal or formal action to rectify the breach.
- Investigation of food complaints.
- Responding to national food safety hazard warnings issued by the FSA (Foods Standards Agency).
- Carrying out food sampling, both formal and informal at retail and trade premises.
- Providing food safety advice to both the public and food business.

As a department we offer, confidential and impartial advice for Suffolk businesses to help them avoid breaking the law inadvertently. Dealing with complex and technical enquiries along with inspecting and monitoring activities is an essential part of the department's workload. We also carry out a comprehensive programme of inspection, which involves matters relating to composition, labelling and description.

- Currently the department has 6392 food premises on its database. Of those premises, 74 are classified as high risk, 3347 medium risk, 2,368 low risk and 510 as having no inspectable risk. This figure is liable to change on a yearly basis.

There are also 206 registered premises under animal feeding stuffs legislation.

The method of prioritising inspection visits was changed when the department adopted the LACORS (Local Authority Co-ordination of Regulatory Services) scheme. The risk rating for each premise is assessed at each visit and by reference to events such as levels of compliance, local risk and the category of individual businesses. In addition the department will have regard to the principles of the Hampton Review, ensuring that no inspection is conducted without a reason and local risk factoring is applied.

The food service provided is specific to the needs and nature of the county. As a consequence time is spent on Home Authority responsibilities, (the principle is outlined below) this includes allocating time to our major food producers.

The largest port in the country is sited in Suffolk, as such we need to provide detailed advice to importers of food. We will also advise and seek compliance on highly specific labelling criteria. This will include the traceability of foods and feeding stuffs and the declaration of foods which contain allergens.

3. Strategic Approach

The aim of the service is to improve public health and enhance food safety in Suffolk. It is the responsibility of the Business Support and High Risk teams to ensure that food and drink produced and sold in Suffolk is safe. We also program our work to take account of national agendas, such as the provision of healthy school meals.

4. Key Objectives

- To check the effectiveness of food management within local food businesses. This can be achieved by the sampling of high risk foods.
- To contribute to the wider public health agenda through the promotion of healthier eating options.
- To raise awareness of food safety issues to local food businesses and/or residents.
- To respond to customer complaints and requests for our service.

5. Home Authority Principle

Where a head office for a food business is located within an authority's area, the authority can adopt the Home Authority Principle. This involves the department working closely with the business to establish procedures to ensure high standards are maintained in the production of safe and accurately described food. The department should assist with food complaints arising from within the company, which have become apparent outside of the county. The department becomes a nationally recognised point of contact and liaison for all subsequent food complaints.

We have implemented this principle by providing advice and information on the legality of product ranges, packaging, composition, labelling and advertising. This service is delivered pro-actively during the inspection of premises and reactively in response to requests from businesses and referrals from other agencies.

This approach provides support to local businesses in developing their products but also helps to prevent potentially expensive problems arising.





6. Food Sampling and Inspection

We produce our own annual sampling programme to establish the effectiveness of the management of food safety in local businesses. The food programme reflects local and national trends. The plan is sufficiently flexible to take account of any areas, which require attention as they arise. Overall levels of sampling are dictated by the size of the budget allocated to the Public Analyst. The vast majority of this sum will be used to cover the cost of analyses of food and animal feeds. We anticipate this will translate to approximately 500 food and 70 feeding stuff samples.

The department is involved in regional and national sampling programmes and other national initiatives as appropriate.

Analysis is undertaken by Lincolne Sutton and Wood Ltd, Public Analysts, based in Norwich.

Only a small percentage of food complaints are analysed and submitted for analysis. This is due to the fact that the continuity of evidence has usually not been maintained by the complainant and thus, it would be difficult to take formal action. However, all complaints are investigated and if necessary a visit to the food business will generally be carried out.

7. Food Hazard Warnings

Food hazard warnings are issued by the FSA to all food authorities in the country when a national food safety issue has arisen with a specific food product.

Food hazard warnings are responded to as directed by the warning notification received from the FSA and in accordance with Code of Practice 16. All warnings and the subsequent action taken is recorded and retained on file.

8. Liaison with Other Organisations

We work closely with a number of organisations and to avoid duplication of effort we have clear guidelines on who is responsible for what.

Partners include:

- **Nine other Trading Standards Departments in the Eastern region that together make up East of England Trading Standards Authorities (EETSA).** Activities include liaison on all key Trading Standards issues, co-ordinated inspections, sampling and advice projects and sharing of information through the EETSA Intranet.
- **HM Customs/Port Health.** Activities include access to HM Customs information systems at Felixstowe Docks to target imported goods for checking and exchange of information concerning counterfeit goods, including food.

- **Suffolk Food Liaison Group.** Made up of representatives from Suffolk Trading Standards and Environmental Health Departments from each of Suffolk's Borough and District Councils, including a representative from Port Health. Activities include liaison on responsibility for enforcement of complementary food safety duties and joint food safety promotional events.
- **Department of Environment, Food and Rural Affairs (DEFRA).** Activities include liaison on responsibility for overlapping work in animal health and welfare, joint inspections to targeted premises and exchange of information on specific premises and businesses.
- **Business Link Suffolk** and other regulators within the Suffolk Local Business Partnership as a forum for sharing best practice within the county.

In addition officers from the department represent the authority and the Suffolk Food Liaison Group on the LACORS Food Standards Agency Framework Agreement Sub Group.

9. Quality Assessment

We aim to continually improve the level of service provided. Procedures are reviewed where necessary to incorporate identified improvements.

10. Review of the Food Law Enforcement Plan

The objectives, set each year, are regularly reviewed by the Principal Trading Standards Officer and Campaign Leader responsible for food issues. This is to check that objectives are being achieved and that the results are reported quarterly. This will allow any variations to be highlighted.

Areas for improvement are incorporated into the following year's objectives, or dealt with as soon as possible if there are no additional financial implications.

We have adopted a project-based approach in relation to food advice and enforcement. This remains appropriate for Suffolk and the resources dedicated to food-related activities are appropriately balanced against other regulatory activities.

11. Areas of Improvement

Advancements have been made in the delivery of food law enforcement. There have been examples of joined up working and co-operation with bodies such as EETSA, where co-ordinated sampling programmes and officer training feature highly. We have also introduced a joint sampling programme for other Trading Standards authorities who use our Public Analyst. However, there are areas identified where improvements can still be made. These include:

- Documented procedures and guidelines in areas where they do not exist or where they can be improved.
- Increasing and maintaining the competency and professional development of staff involved with food law enforcement.





- Maintaining and improving food standards, in particular directing our work to areas highlighted as being important by users of the service.
- Improving our reporting procedures, to give officers, consumers and food businesses up to date, accurate information.
- To work with identified partners to improve the way we deliver our services. For example, joint working, working with each other to minimise the need to inspect certain premises and thereby reducing the burden on businesses.
- We will need to maintain our level of staffing to provide the quality of service we are striving to achieve.

12. Review Against the Service Plan

We monitor performance on a monthly basis. On a quarterly basis this information is reviewed by the Trading Standards Management Team. Also, we will review the content of the plan to ensure it continues to meet the needs of our customers.