

Food Safety & Feedstuffs Law Enforcement Service Plan Review 2004/2005

Food Hygiene Inspections

The number of food hygiene inspections achieved between 1 April 2004 and 31 March 2005 within the target time were as follows:

Risk Category	Target	Achieved	%
A (High)	152	150	99%
B (High)	404	389	96%
C (Medium)	580	517	89%
D (Low)	141	122	86%
E (Low)	63	47	75%
F (Low)	138	88	64%

These figures indicate an increase in performance achievement of 7% in respect of high and medium risk premises and a decrease of 7% in respect of low risk premises with regard to the previous year.

Food Standards Inspections

The number of food standards inspections achieved between 1 April 2004 and 31 March 2005 within the target time were as follows:

Risk Category	Target	Achieved	%
High	2	2	100%
Medium	180	113	63%
Low	293	176	60%

These figures indicate a decrease in performance achievement of 22% in respect of medium risk premises and 13% in respect of low risk premises with regard to the previous year.

Feedstuffs Inspections

The number of Feedstuffs Inspections carried out

Risk Category	Target	Achieved	%
High	9	11	100
Medium	310	273	88
Low	50	147	100

In February 2004 the LACORS risk assessment scheme changed resulting in registered farms being re-graded from low risk to medium risk. This resulted in

the above increase in medium risk visits over the previous year. Visits to non-registered farms were categorized as low risk.

No significant breaches of legislation were found. Minor breaches were dealt with by verbal advice and follow up visits.

Formal Enforcement Action

Twenty-six Improvement Notices were served under Section 10 of the Food Safety Act 1990 in respect of 9 food premises.

A breakdown of the non-compliances contained within the notices are as follows:

Hazard Analysis	4
Repair and Condition of Premises	12
Training	2
Layout	2
Ventilation	1
Protection from Contamination	5

This equates to a 26% increase over the previous years total of 19.

Food Complaints

A total of 196 food complaints in respect of food and food premises were received and fully investigated. This equates to an increase of 35% from the 128 recorded during the previous year.

A breakdown of food complaints received is as follows:

Unhygienic premises/practices	58 (30%)
Foreign body	47 (24%)
Microbiological	23 (12%)
Suspected source of food poisoning	21 (11%)
Chemical / composition	14 (7%)
Labelling	14 (7%)
Voluntary surrender of food	8 (4%)
Structural repair	6 (3%)
Pest infestation	5 (2%)

Home Authority Principle

A total of 16 Home Authority referrals were received by the Food Safety Service and all were satisfactorily dealt with in an informal manner. This figure equals the number of referrals received and dealt with during 2003/2004.

A breakdown of the referrals is as follows:

Meat and Meat Products Composition/Labelling	6
Fishery Products Labelling	3
Dairy Products labelling	3
Bakery Products Labelling/Claims	2
Faulty Packaging	1
Foreign Body	1

Food Sampling

There is no statutory target in respect of obtaining food samples. However, as a rule of thumb, the guideline for proactive chemical sampling is three per thousand population and 1.5 per thousand population for proactive microbiological sampling.

The sampling targets for the year were calculated as 675 chemical and 330 microbiological which included general monitoring, local targeted exercises and regional and national surveillance surveys. They do not include re-active samples such as these taken as a result of consumer complaints or as part of investigations of food poisoning outbreaks.

Five local targeted surveillance exercises were identified and agreed in order to investigate previous perceived problems and possibly identify the need for national surveys in the future and counted for 24 chemical samples and 96 microbiological samples within the total sampling target.

Participation in the following regional and national surveillance surveys was also programmed:

Toxicological Safety of Spices	(EU)
Microbiological Quality of Cheese from Thermised Milk	(EU)
Fresh Poultry with a Focus on Campylobacter	(EU)
Salmonella in ungraded Eggs	(SFELC)
Microbiological Quality of Butter	(HPA/LACORS)
Sentinel Survey for Campylobacter	(HPA/LACORS)
Microbiological Quality of Microwavable Meals	(NSFLG)

The actual samples obtained during 2004/2005 totalled 358 chemical which equates to 53% of the target figure and 243 microbiological which equates to 72% of the target figure.

Factors influencing the performance were identified as:

- ✧ Continuing heavy workload throughout all Environmental Health functions
- ✧ Courier timetable restricting sampling days
- ✧ Samples in respect of local targeted exercises found to be unobtainable or unavailable for certain subjects resulting in an estimated loss of 180 chemical and 120 microbiological samples from the target figure.

Feedstuffs Sampling

The total samples planned for 2004/5 were as follows:

From compounders: 18 samples for oil, protein, fibre, ash + additives
From farms: 32 for heavy metals + additives
For PCB's and Dioxins: 12

Double up samples for mycotoxins where cereals, oil seeds, oil fruits and feed have been stored for some time.

A total of 71 samples were taken and submitted for analysis. Seventeen samples were submitted for the detection of dioxins and polychlorinated biphenyls. Levels were not found to be in excess of those permitted. 32 samples were submitted for the detection of mycotoxins and again levels were not found in excess of those permitted. Of the remaining 17 samples which were taken from compounders, 13 samples received adverse reports. Of these, 3 were not to the prejudice of the purchaser, 4 were from a manufacturer who has now ceased trading, 2 were due to a deficiency in protein in respect of one product and led to discussions on the method of analysis. The company received a warning re further deficiencies. Another failure was due to a labelling omission which suggested a slight excess of copper over that permitted in a daily ration. As a result, advice has been given on amending the label. The remaining three samples were taken informally due to the difficulty in sampling from 1 tonne containers. The failures related to deficiencies in calcium in 2 cases and an excess of fibre in the remaining sample. Explanations were sought from the manufacturer and further samples will be obtained in future.

The only significant failure in terms of numbers of samples obtained was from farms.

Notification, Control and Investigation of Outbreaks of Foodborne Disease

Notifications received from NHS Grampian in respect of foodborne disease totalled 641, an increase of 82 (15%) from the previous year.

A breakdown of specific diseases with comparison to the previous year is as follows:

Salmonella	69	(-11.5%)
E Coli 0157	33	(+51.5%)
Cryptosporidium	59	(+25.4%)
Giardias	6	(+500%)
Aeromonas	42	(+21.4%)
Yersinia	5	(-37.5%)
Dysentery	9	(+33%)
Campylobacter	315	(+13.6%)

No major foodborne disease outbreaks occurred during the year and all required interviews were undertaken in accordance with the Service Standard.

Food Hazard Warnings

Categorisation of Food Hazard Warnings changed when the revised Food Safety Act 1990 Code of Practice (Scotland) came into force on 28 October 2004.

The previous 4 categories (A – D) were replaced by 2 new categories – Food Alert for Action (FAFA) and Food Alert for Information (FAFI).

The Food Hazard Warnings received from the Food Standards Agency are classified and compared to previous years' trends using the new system.

Category of Alert	2004/2005	2003/2004	2002/2003	2001/2002
FAFA	30	29	19	17
FAFI	44	27	44	46
TOTAL	74	56	63	63

All food alerts were fully investigated by telephone or personal visits. However, on two occasions, contact required to be made with retailers and/or caterers in respect of contaminated spice powder and wrongly labelled potato crisps. Press releases were also produced and circulated to the media as well as being placed on Aberdeenshire Council's web site and Arcadia. Several products were identified as being produced using the contaminated spice powder and were removed for sale and destroyed.

Training

Twenty-nine Elementary Food Hygiene courses were presented during 2004/2005 including one for Bengali speaking food handlers and one for Urdu speaking food handlers. This resulted in the attendance of over 600 candidates.

Seven Intermediate level Food Hygiene Courses were also presented resulting in 47 candidates attending. The examination pass rate was recorded as 72%.

The Cook**Safe** support project began in September 2004 and 5 HACCP seminar/workshops were held before 31 March 2005 with 56 food businesses attending.

Improvement Actions

Food Hygiene Inspections

The Food Safety Act 1990, Code of Practice No 9 allowed the inspection of food premises within a 14 day period of the target date to be considered as meeting the frequency of inspection target.

An analysis of dates of inspection over the first three quarters of 2003 revealed that only 55% of successful inspections had been carried out on or before the target date.

In an effort to re-prioritise high risk premises inspections it was agreed by the Environmental Health Managers, Specialist Officer (Food) and the Area Principal Environmental Health Officers that the 14 day window facility be withdrawn in respect of high risk category A and B food premises. This required these premises to be inspected on or before the target date.

Medium risk category C food premises may be inspected using the 14 day window facility with priority given to catering premises.

Low risk category D, E and F food premises are deemed as low priority and may be targeted when workloads permit.

A procedure was also implemented where premises of an assessed negligible risk may be removed from the food hygiene and/or food standards inspection programme, in accordance with the Food Safety Act 1990 Code of Practice. An alternative enforcement strategy requires to be adopted in respect of these low risk premises, once every 3 years, in the form of a postal request for the businesses to self certify their compliance.

It is expected that these amended procedures will raise the performance standard in respect of high risk premises, reduce the inspection programme in respect of low risk premises and present enforcement officers with additional time to focus on high priority issues.

Food Sampling

In order to further alleviate enforcement officers' workloads it was agreed that the Specialist Officer (Food) carry out food sampling duties in respect of national and regional surveillance surveys while authorised sampling officers' undertake local targeted exercises and general monitoring food sampling.