

## **Food Safety & Feedstuffs Law Enforcement Service Plan Review 2005/2006**

### Food Hygiene Inspections

The number of food hygiene inspections achieved between 1 April 2005 and 31 March 2006 within the target time were as follows:

<b>Risk Category</b>	<b>Target</b>	<b>Achieved</b>	<b>%</b>
A (High)	167	163	98%
B (High)	330	324	98%
C (Medium)	605	533	88%
D / E (Low)	417	276	66%

The Food Law Code of Practice revision in October 2004 removed risk category F and premises rated as such were incorporated into risk category E.

The figures indicate an overall increase in performance achievement of 0.5% in respect of high risk premises and decrease of 1.5% in respect of medium and low risk premises.

The 10 high risk premises indicated in the table as being missed were all inspected within the relevant quarter although not within the target timescale.

### Food Standards Inspections

The number of food standards inspections achieved between 1 April 2005 and 31 March 2006 within the target time were as follows:

<b>Risk Category</b>	<b>Target</b>	<b>Achieved</b>	<b>%</b>
High	-	-	-
Medium	28	17	60%
Low	550	239	44%

These figures indicate a decrease in performance achievement of 3% in respect of medium risk premises and 16% in respect of low risk premises with regard to the previous year.

It is suspected that this is not an accurate recording of actual performance and that the number of missed inspections were undertaken as a joint inspection with a programmed food hygiene inspection and not recorded on the electronic premises database as a separate food standards inspection.

## Feedstuffs Inspections

The number of Feedstuffs Inspections carried out:

<b>Risk Category</b>	<b>Target</b>	<b>Achieved</b>	<b>%</b>
High	7	12	100
Medium	237	143	60
Low	50	117	100

The number of medium risk visits achieved was less than that programmed because the Technical Officer (Animal Feedstuffs) left his employment at the beginning of January 2006. His replacement was not in post until mid March and a period of training was required.

No significant breaches of The Feedstuffs (Establishments and Intermediaries) Regulations 1998 were identified. Minor breaches were dealt with via verbal advice and revisits if necessary.

A number of minor labelling errors were identified and raised with the suppliers concerned.

Seven joint visits were conducted with officers of the State Veterinary Service to farms suspected of feeding fishmeal to ruminants - a practice which is banned by the TSE (Scotland) Regulations 2002. Samples were taken where available and results showed that 3 farmers were contravening this requirement. They were issued with warning letters.

As a consequence, advice was given to compound feed manufacturers supplying fishmeal to ensure they were only supplying it in accordance with the regulations.

## Business Advice

All registered premises were written to in December 2005 with advice on the new Feed (Hygiene & Enforcement)(Scotland) Regulations 2005. Businesses were required to notify us if they were continuing their activities under the legislation. This generated a large number of phone calls which gave us the opportunity to provide further guidance on the regulations.

## Formal Enforcement Action

Eighteen 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	9
Facilities and Equipment	2
Lighting/Ventilation	2
Cleanliness	1

This equates to a decrease of 27% over the previous years total of 26.

### Food Complaints

A total of 213 food complaints in respect of food and food premises were received and fully investigated. This equates to an increase of 8% from the 196 recorded during the previous year.

A breakdown of food complaints received is as follows:

Unhygienic premises/practices	61
Foreign body	46
Suspected source of food poisoning	24
Labelling	22
Chemical / composition	17
Microbiological	16
Voluntary surrender of food	12
Structural repair	11
Pest infestation	4

### Home Authority Principle

A total of 13 Home Authority referrals were received by the Food Safety Service and all were satisfactorily dealt with in an informal manner. This figure equates to a decrease of 19% in respect of the 16 received during the previous year.

A breakdown of the referrals is as follows:

Meat and Meat Products composition/labeling	5
Foreign Body	4
Fishery Products composition/labelling	2
Dairy Products composition/labelling	1
Bakery Products labelling/Claims	1

### Food Sampling

There is no statutory target in respect of obtaining food samples. However, as a rule of thumb, the recognised target 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 340 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.

Six 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 48 microbiological samples within the total sampling target.

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

Microbiological quality of cheese from pasteurised milk	(EU)
Microbiological quality of mixed salads	(EU)
Microbiological quality of sandwiches in hospitals and care homes	(HPA/LACORS)
Sentinel survey for campylobacter	(HPA/LACORS)
Microbiological quality of imported and domestic lettuce	(SFELC)
Microbiological quality of microwaveable meals	(NSFLG)
Microbiological quality of water dispensers in licensed premises	(NSFLG)
Microbiological quality of shell eggs used in catering premises	(FSA)
Quality and labelling of poultry meat	(EU)
Safety of foods aimed at infants and young children	(EU)
Salt levels in pre-packed products	(FSA)
Salt, fat and sugar levels in raw materials	(FSA)

The actual samples obtained during 2005/2006 totalled 453 chemical which equates to 67% of the target figure and 203 microbiological which equates to 60% of the target figure.

These figures indicate an increase of 14% in respect of chemical sampling and a decrease of 12% in respect of microbiological sampling with regard to the previous year's performance.

Factors influencing the performance were identified as:

- ✧ Continuing heavy workload throughout all Environmental Health functions
- ✧ Courier timetable restricting sampling days and times
- ✧ The requirement to obtain microbiological samples in a formal manner and to maintain a satisfactory sample temperature during sampling and transportation to the laboratory.
- ✧ Samples in respect of local targeted exercises found to be unobtainable or unavailable for certain subjects resulting in an estimated loss of 24 chemical and 36 microbiological samples from the target figure.

### Feedstuffs Sampling

The total samples planned for 2005/06 were as follows:

From compounders: 20 samples for oil, protein, fibre, ash

20 samples for additives, heavy metals and mycotoxins  
10 samples for PCB's and Dioxins

From farms: 5 for heavy metals, mycotoxins and additives  
5 for PCB's and dioxins

A total of 57 samples were taken and submitted for analysis.

Ten of these samples were submitted for the detection of dioxins and polychlorinated biphenyls. Levels of dioxins were found to be within current permitted limits. There are currently no limits set for dioxin like PCB's but the results are sent to the Food Standards Agency to inform on possible future limits.

21 samples were taken from compounders for the detection of mycotoxins, additives and heavy metals. We are awaiting the results of 12 samples but of the 9 received, levels of mycotoxins and heavy metals were not found in excess of those permitted. 1 informal sample had a deficiency in Vitamin A and further samples have been obtained and another sample had an incorrect quantity of Vitamin A on the label.

Another 21 samples were taken from compounders for accuracy of declarations of oil, protein, fibre and ash. 18 results have been received to date with only 1 adverse reports of a deficiency in ash and fibre but these were not considered to be to the prejudice of the purchaser.

The results of the 5 on farm samples have not yet been received.

The only significant failure in terms of numbers of samples obtained was 5 farm samples for the presence of dioxins and PCB's. This was in part due to the departure of the Technical Officer (Animal Feedstuffs) during the year.

#### Notification, Control and Investigation of Outbreaks of Foodborne Disease

Notifications received from NHS Grampian in respect of foodborne disease totalled 506, a decrease of 135 (21%) from the previous year.

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

Salmonella	55	(-20%)
E Coli 0157	20	(-40%)
Cryptosporidium	42	(-29%)
Giardias	6	(0%)
Aeromonas	26	(-38%)
Yersinia	6	(+20%)
Dysentery	10	(+10%)
Campylobacter	341	(+7%)

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

### Food Hazard Warnings

The food alerts received from the Food Standards Agency during 2005/2006 are classified and compared to previous years trends below.

<b>Category of Alert</b>	<b>2005/2006</b>	<b>2004/2005</b>	<b>2003/2004</b>	<b>2002/2003</b>
FAFA	16	30	29	19
FAFI	57	44	27	44
TOTAL	73	74	56	63

All food alerts were fully investigated by telephone or personal visits. However, on three occasions, direct contact by letter was required to be made with retailers and/or caterers in respect of instances of contamination by illegal dyes.

Press releases were also produced and circulated to the media as well as being placed on Aberdeenshire Council's web site and Arcadia.

### Training

Twenty-eight Elementary Food Hygiene courses were presented during 2005/2006, including one for Cantonese speaking food handlers. This resulted in the attendance of over 500 candidates.

Four Intermediate level Food Hygiene courses were also presented resulting in 36 candidates attending. The examination pass rate was recorded as 83%.

The Cook**Safe** support project progressed during 2005/2006 and 28 HACCP seminar/workshops were held with 299 food businesses attending. This figure includes 4 seminar/workshops in Cantonese and one in Urdu using trainers provided by the FSAS.

### Improvement Actions

#### **Food Standards Inspections**

Although the food hygiene inspection performance has remained at a consistently high level, the food standards inspection performance has decreased significantly during the past 2 years by an average of 27%.

In order to address this trend, the emphasis will be placed on food enforcement officers carrying out joint food hygiene and food standards inspections whenever possible and to allow any programmed food standards inspection to be brought forward or put back in respect of the due inspection dates to permit the optimum number of joint inspections to be undertaken.

In addition, records will be maintained of all food standards issues discussed during a food hygiene inspection as a separate food standards inspection on the electronic premises database and in the individual premises files.

### **Food Enforcement Action**

Although the serving of formal action notices remained at a consistent level, it is felt that the decrease in performance of other food enforcement duties may reflect on the current procedure to revisit twice in order to check on specific contraventions before serving a formal notice on the third occasion of observing the non-compliance.

It is, therefore, proposed to adopt the procedure of serving formal action notices on food business operators at the first revisit stage following the notification of a contravention of the Regulations and including an appropriate time scale for improvement.

This amended procedure will allow food law enforcement officers to allocate additional time to other high priority food issues.

### **Food Sampling**

The Specialist Officer (Food) will continue to undertake sampling duties in respect of national and regional surveillance surveys where appropriate to allow authorised sampling officers to increase the performance in respect of the general monitoring food sampling programme.