

**DELIVERY OF OFFICIAL CONTROLS
AUDIT PROGRAMME (SCOTLAND) 2010-2015**

Executive Summary

This paper presents the Agency in Scotland's proposed audit programme for the period 2010-2015.

A presentation was given to the Committee in October 2009 following completion of the focussed audit of establishments subject to approval under regulation (EC) No 853/2004 laying down specific hygiene rules for food of animal origin. The purpose of the focussed audit was to look at Local Authority systems, procedures and records that supported any re-assessment and the delivery of official controls in establishments subject to, or approved, under Regulation (EC) No 853/2004. A summary report was produced which highlighted general deficiencies across the 15 Local Authorities and 30 establishments visited.

Good practice identified during the course of this audit has been published on the Scottish Food Enforcement Liaison Committee (SFELC) website.

Following the findings of the audit Charles Milne, Director wrote to all Local Authorities in Scotland. All responded to his letter and gave their assurance that that conditions will improve, or do not exist within their areas of responsibility.

The 2010-2015 Audit programme will include a focussed audit on Regulation (EC) No 852/2004 on the Hygiene of Foodstuffs and is due to commence in April 2010. The 2010-2015 audit programme and the audit brief for the Regulation (EC) No 852/2004 focussed audit have been published on the Agency's website.

The Committee is invited to:

- Note the proposed audit programme for 2010-2015

Audit Branch

Contact: Marion McArthur Tel: 01224 285122

Background

The primary purpose of Agency audits of Local Authorities is to provide assurance that local delivery of official controls for feed and food is compliant with EC and UK legal requirements and official guidance. The detailed guidelines for the conduct of audits of competent authorities are set out in an EC Decision of September 2006¹.

The power to set standards, monitor and audit Local Authority food law enforcement services was conferred on the Food Standards Agency by The Food Standards Act 1999 and The Official Feed and Food Controls (Scotland) Regulations 2009. The audit will be undertaken under section 12 of the Act and regulation 7 of the Regulations.

The Framework Agreement on Local Authority Food Law Enforcement sets out the arrangements through which the Agency audits Local Authority enforcement activities to help ensure that Local Authorities are providing an effective service to protect public health. The overarching aims of the audit scheme² are to:

- Help to protect public health by promoting effective local enforcement of food law;
- Maintain and improve consumer confidence;
- Assist in the identification and dissemination of good practice to aid consistency;
- Provide information to aid the formulation of Agency policy;
- Promote conformance with the '*Food Law Enforcement – Standard*' and any relevant central guidance or Codes of Practice;
- Provide a means to identify underperformance in Local Authority food law enforcement;
- Promote self regulation and peer review;
- Identify continuous improvement.

¹Commission Decision (2006/677/EC) of 29 September 2006 setting out the guidelines laying down criteria for the conduct of audits under Regulation (EC) No 882/2004 of the European Parliament and of the Council on official controls to verify compliance with feed and food law, animal health and animal welfare rules

² Chapter 5 of the Framework Agreement on Local Authority Food Law Enforcement: 'Audit Scheme'

Proposed Areas for Audit

The proposed topics for audit during 2010-2015 are listed below. Prior to implementation of any of these audits, a detailed audit brief will be issued. It is likely that all of these audits will include verification visits (reality check).

This follows similar programmes in England, Wales and Northern Ireland.

1. Information Gathering, desktop exercise (January 2010)

A questionnaire was sent to all Local Authorities to gather information and intelligence which will help identify specific Local Authorities and subjects for audit. This exercise has now been completed.

2. Focussed Audit of the Delivery of Official Controls in Establishments Subject to Regulation (EC) No 852/2004 on the Hygiene of Foodstuffs. (Due to commence April 2010)

This focussed audit will address Recommendations 9 and 15 of the Pennington Inquiry Report into the 2005 *E. coli* outbreak at Bridgend, Wales. In addition to the general requirements of Regulation (EC) No 852/2004, this programme will focus on the Local Authority's training provision to ensure that all Officers who check Food Safety Management Systems based on Hazard Analysis Critical Control Point (HACCP) principles, including those responsible for overseeing the work of those Officers, have the necessary knowledge and skills (Recommendation 9). Also, that existing intervention arrangements and processes to assess and enforce HACCP based food safety requirements in food businesses are adequate, risk based, and able to effect any changes necessary to secure improvements (Recommendation 15).

In addition to assessing compliance levels, identifying any areas where improvements can be made and informing Agency policy, it is anticipated that these audits will be particularly useful in identifying and disseminating good practice related to compliance with Article 5 of Regulation (EC) No 852/2004 and associated food law enforcement issues.

3. Focussed Audit of the Delivery of Official Controls in Establishments Subject to Regulation (EC) No 183/2005 laying down requirements for Feed Hygiene.

During the 2004-2008 Core Audit Programme, Feeding Stuffs enforcement was included as part of the audit. However, as the Feed Law Code of Practice only came into force part way through the audit programme, a formal audit was not conducted.

In addition various shortcomings in delivery of official controls were identified during the Food and Veterinary office (FVO) mission on animal feed to the UK in June

2009. Although this mission did not extend to Scotland we have no evidence to suggest that the findings would be any different.

4. Focussed Audit of Multiple Outlet Food Business Operators (FBOs) with premises in different Local Authority areas

This audit will involve Food Business Operators who operate across multiple Local Authorities to determine the levels of consistency and appropriateness of enforcement actions delivered by the various Local Authorities involved. It will act as a counterpoint to the Focussed Audit on the enforcement of Regulation (EC) No 852/2004 by Local Authorities and will be designed to gain a different perspective on the actions of the enforcement community in Scotland.

5. Food Standards

Food Standards interventions are part of the system for ensuring that food meets the requirements of food standards law, including proper presentation, labelling and advertising so as not to confuse or mislead; compliance with compositional standards; and the absence of non permitted or excessive levels of additives, contaminants and residues.

From the 2004-2008 Food Standards Agency Core Audit Programme it was evident that records were insufficient to demonstrate that food standards interventions were being carried out in accordance with the Food Law Code of Practice and the Framework Agreement in relation to food standards enforcement.

A focussed audit similar in format to that on Regulation (EC) No 852/2004 would be carried out.

6. Primary Production

Enforcement of food and feed hygiene at primary production is carried out in Scotland generally by Local Authorities. In addition, Scottish Government Rural Payments and Inspections Directorate (SGRPID) also carry out primary production food hygiene enforcement whilst undertaking cross compliance inspections. Coordination of enforcement is enabled by the use of the Scottish Primary Production Official Controls System (SPPOCS) and is overseen by the Food Standards Agency.

Local Authority Officers inspect farms within the scope of the respective requirements of Annex I of Regulation (EC) No. 852/2004 and Annexes I and III of Regulation (EC) No. 183/2005 within a single regime of integrated food and feed hygiene inspections, carried out according to the current regime frequency for primary production food law. This has been written into Annex 10 of the Food Law Code of Practice which was issued to local authorities on 20 March 2009.

The SGRIPD and Local Authority elements of this regime could be audited separately.

7. Focussed Audit on Imported Food Products not of animal origin (PNAO)

Following concern about the UK controls on food imports, and whether these controls were sufficient to ensure the safety of imported food, a Cabinet Office report 'The Organisation of the Government's Controls of Imports of Animals, Fish, Plants and their Products' (November 2002) recommended a 'Step Change' in the co-ordination and delivery of Local Authority inspection of imported foodstuffs within 1 year (by 31 March 2004). Work to improve these Local Authority controls was taken forward by the Food Standards Agency. A new Imported Foods Division was established to address the areas of change identified by the Cabinet Office report. The work included agreed Agency recommendations to improve the effectiveness of imported food controls ('10 Point Plan') and the delivery of a substantial training programme for Local Authority Officers.

As part of this, a UK programme of focussed audits of Local Authority controls of imported food of non-animal origin was carried out. Renfrewshire Council, who are responsible for Glasgow airport, was included in this programme (March 2004). This focussed audit did not cover inland Local Authorities who are responsible for enforcing food safety controls on imported food within their areas.

There has been no audit activity in this area in Scotland since this focussed audit in March 2004.

Foodborne Disease Strategy 2010-2015: Campylobacter Risk Management Programme

Executive Summary

1. The Agency plans to put its over-arching Foodborne Disease Strategy (FDS) for 2010-2015 out to public consultation in early summer. This will include a number of targeted Risk Management Programmes to address the key causes of foodborne illness in the UK.
2. Campylobacter remains responsible for the largest number of cases of foodborne illness in the UK each year. Provisional figures indicate an increase of around 16% in the number of laboratory reported cases of Campylobacter in the UK between 2008 and 2009. Figures recently published by Health Protection Scotland indicate that in Scotland, this increase was 31%.
3. Studies have established that retail chicken is the single largest source of human Campylobacter infection, and its importance in Scottish clinical infection was clearly demonstrated by research recently published by the FSA in Scotland (FSAS). Additionally, the most recent Agency-commissioned UK-wide survey on the prevalence of Campylobacter in chicken indicated that 65% of chicken on retail sale was contaminated with the pathogen.
4. The reduction of foodborne disease caused by Campylobacter continues to be a key aim of the new Agency strategic plan 2010-2015. Our efforts to achieve this strategic aim will centre on the development and implementation of a Campylobacter Risk Management Programme (CRMP). This programme will encompass a range of projects targeted at different points across the food chain, from farm to fork. Key elements of this programme include:
 - Establishment of a Government-Industry Working Group in August 2009 to identify practical and effective interventions for the control of Campylobacter.
 - Development of a joint funders strategy on Campylobacter, following a joint workshop with Biotechnology and Biological Sciences Research Council (BBSRC) and Defra in October 2009.
 - Hosting an international meeting on 30-31 March 2010 to learn more about successful interventions in other countries and consider their feasibility in the UK.
 - Developing a target to reduce Campylobacter in raw chicken at retail level by December 2010, to be achieved by April 2015.
 - Focussing Food Safety Week in June 2010 on actions associated with preventing Campylobacter, through cooking thoroughly and avoiding cross-contamination.
5. FSAS will contribute to the implementation of this programme in Scotland by ensuring the key messages are effectively delivered to the Scottish poultry

and retail sectors and by undertaking Scottish specific promotion of Food Safety Week 2010.

6. In order to support this work, FSAS intends to commission research to evaluate the uptake of biosecurity measures on Scottish poultry farms and to assess the impact of interventions on human infection in Scotland using molecular typing methods. These project areas were highlighted in the Agency's Forward Evidence Plan 2010 (published on 24 February), and it is anticipated that the research requirements will be published in the Spring.

7. The Committee is invited to:

- Note the Agency's progress in developing a Foodborne Disease Strategy for 2010-2015 and the programme of work designed specifically to reduce Campylobacter.

Science Branch

Contact: Jacqui McElhiney Tel: 01224 285121

sacn scientific advisory committee on nutrition



We wish to inform you that the following papers have been added to the SACN website.

Draft Report for Scientific Consultation: 'The influence of maternal, fetal and child nutrition on the development of chronic disease in later life' - February 2010

[View & Download Report/Position Statement](#)

Dear Interested Party,

This is to inform you that the report above has been published by the Scientific Advisory Committee on Nutrition recently and is now available to download via the SACN website.

Kind regards,
Scientific Advisory Committee on Nutrition (SACN)
Food Standards Agency (FSA)

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