

PUBLIC PROTECTION COMMITTEE: 3rd June 2014

REPORT OF THE CORPORATE DIRECTOR - ENVIRONMENT

FOOD AND FEED LAW ENFORCEMENT SERVICE PLAN 2014 / 15

1. Background

Cardiff Council has a duty to enforce the Food Safety Act 1990; the Official Food and Feed Controls (Wales) Regulations 2009 and a wide variety of other food / feed legislation including the Food Hygiene (Wales) Regulations 2006.

As part of the Food Standards Agency's Framework agreement the Council is required to produce a Food Safety Service Plan setting out the arrangements it has in place to discharge these duties. This Food and Feed Law Enforcement Service Plan is produced in response to that requirement and is designed to inform residents, the business community of Cardiff and the wider audience of the arrangements Cardiff Council has in place to regulate food safety. A copy of the draft Food & Feed Law Service Plan 2014/15 has been attached to this report as **Appendix 1.**

The Service Plan details how the Regulatory Commercial Service (Public Protection and Trading Standards) and Public Analyst will fulfil the major purpose of ensuring the safety and quality of the food chain to minimise risk to human and animal health. To achieve this, the Council will provide advice, education and guidance on what the law requires, conduct inspections, investigations, sampling and take enforcement action where appropriate.

The plan details the demands on the service, the risk based work programme and the resources available to deliver the required work. As with many other Council services the service faces increasing demands with reducing resource.

The plan explains the Food Standards Agency expectations of Local Authorities, some of the achievements in 2013/14 and the challenges for the year ahead. Some of the key elements of the plan are set out below.

2. The Framework Agreement on Official Feed and Food Controls by Local Authorities

The Framework Agreement sets out what the Food Standards Agency expects from local authorities in their delivery of official controls on feed and food law. The Agreement sets out the planning and delivery requirements of feed and food official controls, based on the existing statutory Codes of Practice.

One of the requirements within the framework is that local authorities carry out interventions/inspections at all food hygiene, food standards and feeding stuffs establishments in their area, at specified frequencies. These are shown in

Table 1. The Food Standards Agency has the power to inspect local authorities to determine the Council’s performance against the standard. Cardiff Council was audited in 2013/14 on their arrangement for managing the risks in businesses preparing and/or selling shellfish and are expecting the results very shortly.

Table 1 - Food hygiene & Trading Standards Food Standards intervention frequencies

Category	Food hygiene minimum intervention frequency	T S Food standards minimum intervention frequency
A	At least every six months	At least every 12 months
B	At least every 12 months	At least every 24 months
C	At least every 18 months	Alternative enforcement strategy or intervention every five years
D	at least every 24 months	N/A
E	A programme of alternative enforcement strategies or interventions every three years	N/A

It should be noted that a new food business which falls under the terms of food safety legislation must be inspected within 28 days of notification to the Council.

3. Performance Review 2013/14

Planned High Risk Food Hygiene Inspections (Risk Category A-C)

An overall high risk inspection rate of 85.98% was attained against a target of 100%. It was recognised at the time of plan adoption that resources were insufficient to deliver the full requirements of the Food Law Code of Practice. In year budget management strategies compounded the resource issue. However, in light of the reduced resource available decisions were made regarding new priorities which included inspection of all A, B and non broadly compliant C premises. All these premises were inspected. Any high risk premises due for inspection but not inspected as part of the programme for 2013/14 have been included in the programme for 2014/15.

Other Planned Food Hygiene Interventions (Risk Category D-E)

An overall intervention rate of 41.17% was achieved for category D and E premises.

Food Hygiene Unrated Premises

100% of premises which were unrated new businesses on the 1 April 2013 were inspected during the year. The number of new businesses being carried forward has reduced from 224 in April 2013 to 56 in April 2014 demonstrating significant in year

progress. However, the requirement to inspect new businesses within 28 days has not been achieved.

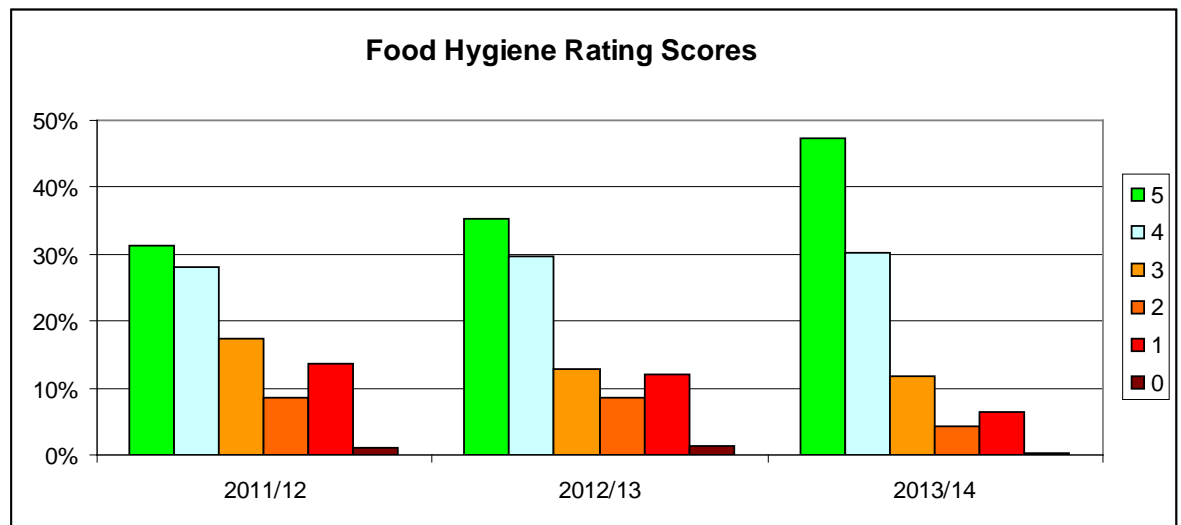
Food Standards Inspections

99.5% of high risk food standard businesses were inspected (against a target of 100%). Outstanding premises will be inspected by the end of May 2014.

4. Significant achievements during 2013/ 14 included:

Successful bids for funding: Successful bids for funding were made to deliver sampling programmes, translating the Council’s Food Safety Management System into 6 languages and to hold two food business forums to provide information on the new statutory food hygiene rating scheme.

Food Hygiene Rating Scheme (FHRS): On 1st October 2010 the FHRS was introduced in Cardiff. As premises have been inspected they have received a hygiene rating. In November 2013 a statutory scheme was introduced throughout Wales. Since the Scheme was launched 85.60% of premises have been assessed under the Food Hygiene Rating Scheme. The Scheme has had a positive impact in improving standards in food businesses with improvements in “Broad Compliance” on an upward trend and the number of premises securing a 5 rating increasing annually.



Food, Safety & Health Business Forum:

In April 2013, a Business Forum was held in County Hall, nurseries and child-minders across the City attended. Two further forums were held at City Hall in November 2013 to explain the new legislation relating to the Food Hygiene Rating Scheme.

Food Business Newsletter:

In 2013-14 one issue of the food business newsletter was produced and officers distributed it by hand at routine inspections. It was also emailed where email addresses of businesses were available.

Managing E.coli risk within the Council:

In 2014/15 the Council adopted a Corporate Food Safety Management System. The system has been supported by a comprehensive training programme during the year and an E-learning package is being developed which will allow ongoing training needs to be met. Significant progress has been made to address the E.coli risk to the Council, however, there is a need to maintain this momentum to embed new corporate procedures to ensure full compliance.

The Horsemeat Scandal:

This high profile, wide-reaching food incident was discovered in January 2013 and has rarely been out of the headlines since. Trading Standards were one of only two Welsh authorities asked to take formal samples on behalf of the FSA – one of which has proved positive for horsemeat. Trading Standards were also tasked by members to sample across the authority's premises including schools and leisure centres. Over 250 samples were taken in a period of less than four weeks but no problems were found. Conducting regular checks into meat speciation has become one of Trading Standards priorities. In 2014/15 the Council will again participate in the European Union survey into horsemeat substitution.

Broadly Compliant Premises

The percentage of food premises which were deemed to be broadly compliant with food hygiene law i.e. rated a 3 or above, increased during the year to 87.27% (excluding unrated premises) or 85.71% (including unrated premises). This is in part the positive impact of the implementation of the Food Hygiene Rating Scheme which encourages many businesses to strive for a better rating.

Two projects trialling an alternative approach to improving food hygiene standards in poor performing food businesses were undertaken between May 2012 and February 2013. Food businesses were recruited and they received on-site practical, interactive food hygiene training in relation to cross contamination, temperature control, cleaning and hand washing. These projects were evaluated during 2013 /14 and results showed marked improvements in knowledge and practices in the 4 food safety areas assessed.. This approach is essential in securing improvement in some poor performing premises.

5. Challenges for 2014/15

Events - Capital City status brings with it extra demands and challenges. The City hosts many outdoor events across a wide range of venues. The time spent planning, organising, monitoring events and inspecting and sampling at food premises during events each year should not be underestimated. These are additional commitments above the planned inspection programme, often not experienced by other Councils

Collaboration -During 2014/15 Cardiff Council intends to consider the benefits of Regulatory Services across three council areas (Cardiff, Bridgend and the Vale) being delivered under a single management structure. *(The term Regulatory Service embraces the Trading Standards, Environmental Health and Licensing functions).*

If approved the move to a single management structure will be incremental over a

three year period.

Financial - The continuing financial difficulties faced by all local authorities has required implementation of remedial measures to offset budgetary deficits. This has had an impact on the delivery of food services over the last 2 years. This pressure will continue in the year to come.

Food Hygiene Rating (Wales) Act 2013 –During 2014/15 the Council is required to migrate premises that had a rating under the non-statutory scheme across to the mandatory scheme. This will involve either giving a rating following a full inspection or giving a new rating based on the non-statutory rating. There will be a number of lower risk premises that will need to be inspected, not included in the inspection programme for the year, funding from Welsh Government will be sought to cover some of this additional burden.

Food Information Regulations – These Regulations are coming into force during the year and will have a substantial effect on all food businesses. Takeaways for example, will now have to declare all allergens in their food. The Regulations will also have a impact on caterers who hitherto have been exempt from many labelling requirements so there will be a considerable resource issue in educating and enforcing the new requirements.

Resources

A summary of the resources available across the Regulatory Service for dealing with safety (Food Hygiene, Trading Standards & Public Analyst) is detailed in the attached plan. To deliver the full requirements of the Framework Agreement would require additional resource. Prioritisation is undertaken to ensure that resources are deployed as effectively as possible.

6. Financial Implications

Approval of this FLESP does not directly result in any additional financial implications.

7. Legal Implications

Under Section 41 of the Food Safety Act 1990, as amended by paragraph 18 of Schedule 5 to the Food Standards Act 1999, the Food Standards Agency can require Food Authorities to provide them with reports and information regarding the Authorities' enforcement of the Act. Local Authorities are required to supply them with statistical information on inspections, prosecutions, official samples, and informal samples.

8. Recommendations

Committee is asked to:-

1. Approve the 2014/15 Food Law Enforcement Service Plan

2. Authorise the Corporate Director to make administrative amendments to the 2014 /15 Food Law Enforcement Service Plan should the need arise.

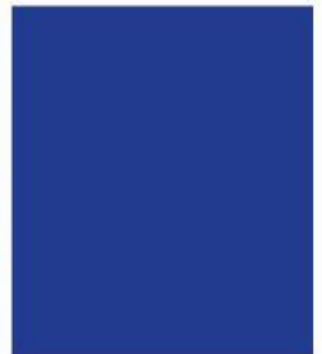
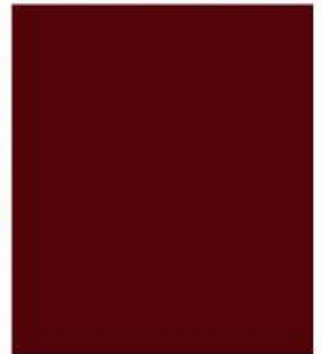
**JANE FORSHAW
CORPORATE DIRECTOR – ENVIRONMENT
MAY 2014**

This report has been prepared in accordance with procedures approved by the Corporate Management Team

Appendices:

Food Law Enforcement Service Plan 2014/15

City & County of Cardiff **Food and Feed Law** **Service Plan** 2014/15



Introduction

Cardiff Council has a duty to enforce the Food Safety Act 1990, the Official Food and Feed Controls (Wales) Regulations 2009 and a vast array of food and feed legislation including the Food Hygiene (Wales) Regulations 2006 and as part of the Food Standards Agency's Framework agreement are required to produce a Food and Feed Service Plan setting out the arrangements it has in place to discharge this duty. This Food and Feed Law Enforcement Service Plan is produced in response to that requirement and is designed to inform residents, the business community of Cardiff and the wider audience, of the arrangements Cardiff has in place to regulate food safety. It also shows how these activities contribute to and support others in delivering Corporate objectives to the community as a whole.

The Service Plan details how the Food Service will fulfil the major purpose of ensuring the safety and quality of the food chain to minimise risk to human and animal health. To achieve this, officers from the Council's Regulatory Services will provide advice, education and guidance on what the law requires, conduct inspections, investigations, sampling and take enforcement action where appropriate. This Plan is therefore designed to both meet the requirements laid down by the Food Standards Agency and to clearly show how through encouragement, regulation and enforcement, food safety will be delivered in Cardiff and the resources available to do this.

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1

Service Aims and Objectives

1.1 Aims and objectives

The Food and Feed Safety Service is committed to improving the safety and quality of the food chain and to demonstrate this, the Service has adopted the following aims and objectives.

The overall aim of the Service is to:-

Protect public health by ensuring that food for human or animal consumption is without risk to the health and safety of consumers, and is labelled and described accurately.

To achieve this, the service has adopted the following 12 key delivery priorities:-

- Meet the 'The Standard' outlined in the Framework Agreement on Local Authority Food Law for enforcement of food hygiene, food standards and/or feed legislation.
- Ensure that all food and feed premises receive an intervention in accordance with relevant statutory codes of practice.
- Investigate food and feed complaints.
- Develop Primary Authority partnerships with local businesses and respond to enquiries from other enforcing authorities.
- Provide advice to consumers and business on food and feed matters and respond to all enquiries for service within specified target times.
- Maintain an adequate food and feed inspection and sampling programme.
- Ensure that food and feed imported into the European Union through the Port of Cardiff meet legal requirements and are subject to checks.
- Control and investigate sporadic and outbreak cases of food poisoning and food related infectious disease.
- Investigate, initiate and respond to food alerts and incidents.
- Work with other food and feed authorities and professional bodies to ensure consistency of food and feed safety enforcement.
- Promote food and feed safety and standards.
- Take appropriate enforcement action proportionate to the degree of risk to public health

1.2 Links to Corporate Objectives

Cardiff's Corporate Plan 2014-17 sets out the Council's priorities for the next few years towards the delivery of services to the people of Cardiff. The Plan sets out the vision for the city highlighting the Council's contribution to 3 key priorities:

- *Economic development as the engine for growth and jobs;*
- *Education and skills for people of all ages to fulfil their potential and be well prepared for employment in the Cardiff economy and beyond; and*
- *Supporting vulnerable adults, children and young people in time of austerity*



The Food and Feed Service through its core business activities supports the Corporate Plan by sitting within the Council's Environment portfolio and contributing to priorities of **supporting vulnerable adults** and **economic development**.

A number of actions underpin these corporate priorities and can be found within this Plan.

2

Background

2.1 Profile of Cardiff

Cardiff is the capital city of Wales and is continuing to grow faster than any other capital city in Europe. In population terms, it is the largest Local Authority in Wales (340,000) but measures of population belie Cardiff's significance as a regional trading and business centre. The population swells by approximately 70,000 daily with commuters and visitors. Its popularity as a shopping and leisure destination extends way beyond Wales with many visitors not only from the rest of the UK but from overseas.



Cardiff is the seat of government and the commercial, financial and administrative centre of Wales. Cardiff boasts one of the most vibrant city centres in the UK and on a typical weekend, Cardiff's night time economy can attract over 40,000 people and sometimes more than 100,000 when the City's Millennium Stadium hosts international events.

Cardiff Bay is a world class waterfront development, and Cardiff's seaport handles a variety of cargoes. The Millennium Stadium ranks among the world's finest sports stadia hosting major events that demonstrates Cardiff's developing role on the international stage. It's impressive range of cultural, sporting and arts facilities including the National Museum of Wales and the Museum of Welsh Life, St Davids Hall, New Theatre, Millennium Centre and new City Stadium, as well as the International Sports Village.



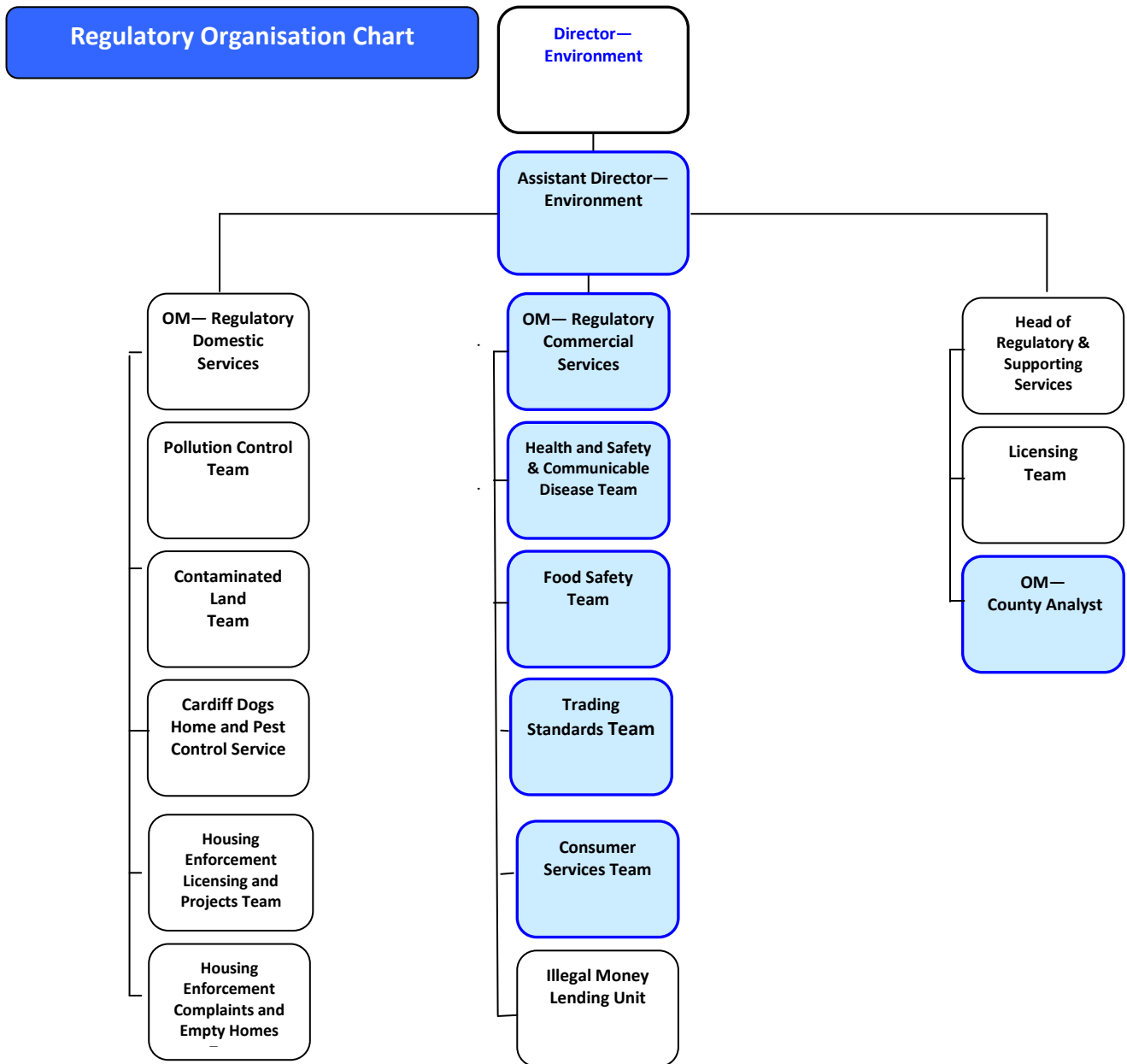
Such developments have led to a vibrancy and dynamism across the City which presents significant challenge to enforcement services wanting to secure the safety of their local population and visitors e.g. the increasing number of food businesses which stands currently at 3152. Challenges are also presented as a consequence of the current economic climate leading to a high turnover of food businesses and the diverse culture and languages encountered.

2.2 Organisational structure

Cardiff Council's political structure comprises the Council, the Cabinet, statutory committees and Scrutiny under which a number of other Committees sit. Food and Feed safety is delegated to the Public Protection Committee who approves this Service Plan and the various interventions proposed.

Responsibility for delivering food and feed safety falls within the Regulatory Commercial Service of Cardiff Council located under the Environment Directorate.

The Public Protection Service deals with food safety, port health, health improvement and communicable disease but responsibility for such activities is not confined to these sections alone. The Trading Standards service plays a key role in dealing with food standards, food labelling, feed safety and feed standards and Cardiff Scientific Services provides the Public Analyst function providing analytical services. Operational functions incorporated within the Environment Directorate are illustrated in the following table with those that have responsibility for food safety issues highlighted in blue.



2.3 Scope of the Food and Feed Service

Cardiff Council’s Regulatory Commercial Service is responsible for providing a comprehensive food and feed service combining education, advice and enforcement. The scope of the Food and Feed Service includes:-

- Provision of education, training and advice on food and feed issues;
- Undertaking of food hygiene, food standards, feed and agricultural inspections;
- Investigating complaints;
- Implementing the Food Sampling programme;
- Investigating cases of communicable disease including food poisoning;
- Responding to Food Standard Agency alerts as appropriate;
- Examining and responding to planning and licensing applications in relation to food premises where appropriate;

- Implementing the National Food Hygiene Rating Scheme;
- Port health;
- Approval of product specific establishments and feed businesses.

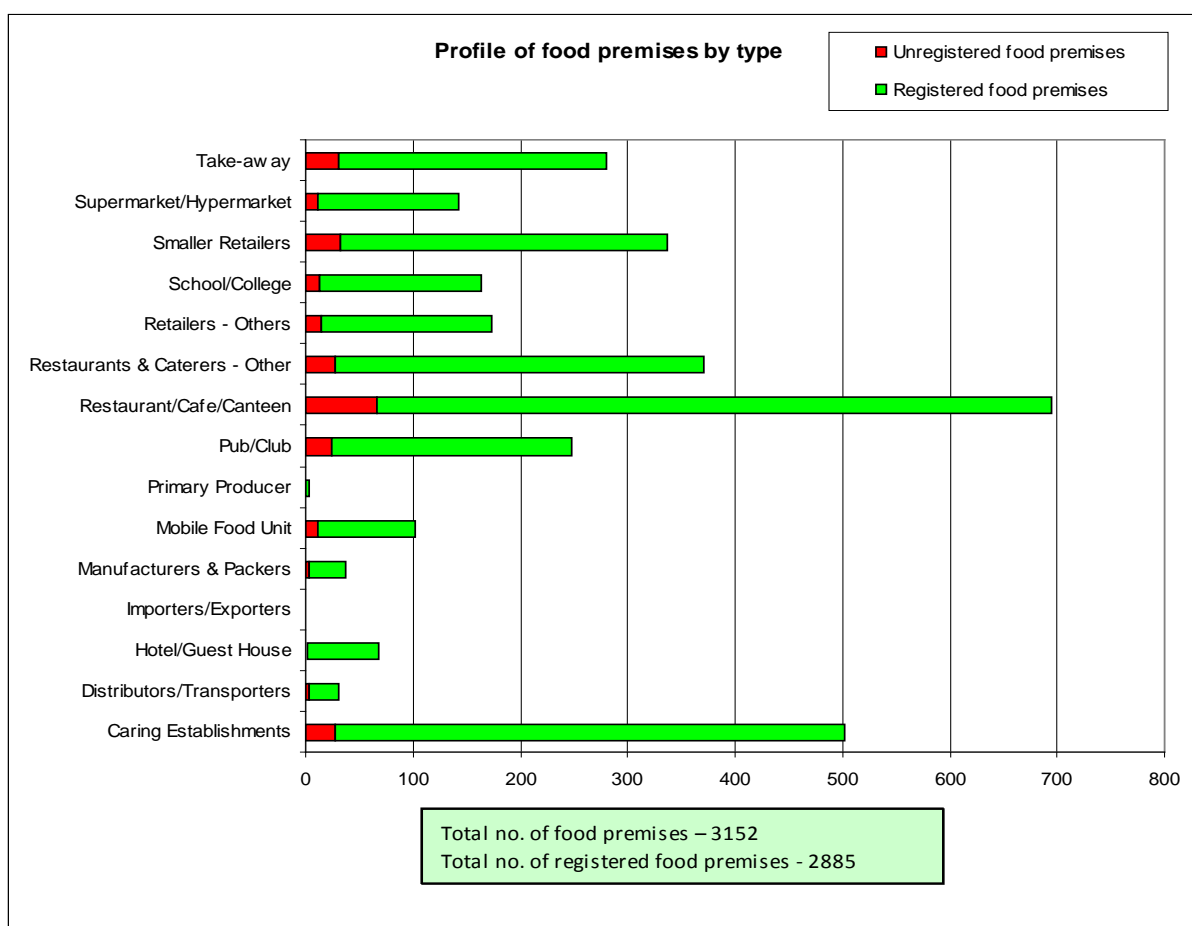
Responsibility

Responsibility for food safety activities within Regulatory Commercial Services is broken down as follows:-

Team	Responsibility
Food Safety Team	Inspection
	Complaints and requests for service
	Education
	Food sampling
	Food Safety alerts and incidents
	Respond to planning/licensing applications
	National Food Hygiene Rating Scheme
	Port Health
	Approval of product specific establishments
	Trading Standards
Food Standards	
Inspection	
Complaints and requests for service	
Education	
Food and feed sampling	
Food and feed safety alerts and incidents	
Responsible for the registration/approval of feed premises.	
Communicable Disease Team	Communicable disease
Cardiff Scientific Services	Analytical services

2.4 Demands on the Food and Feed Service

Cardiff has approximately 3152 food premises that require a range of interventions. The following table provides a profile of the food premises within the city by type. Food business operators must register their businesses with the food authority except where the establishment requires approval. Of the 3152 identified food businesses 2885 are registered as can be seen below.



Feed Safety

Changes in legislation have led to new registration and approval requirements for feed businesses. This is because of the “farm to fork” approach where feed that is fed to animals that enter the food chain is eventually eaten by people. Controlling this is an important part of food safety.

Since 2004, premises that are involved in the feed chain also have to be registered with trading standards and those that manufacture complex feeds have to be specifically approved.

Over the past year, how feed official controls are conducted has been under review with most authorities struggling to achieve feed enforcement targets due to reduced resources. The decision has been made by Welsh Government to continue with Local Authority enforcement but with more regional collaboration and possibly direct funding for the service via bids, similar to the way it is conducted in England.

Service delivery points

Food related services are delivered from 3 service delivery points and while the service primarily operates office hours from Mondays to Fridays, weekend and out of business hours duties are carried out as the need arises. Regulatory Services also operate an out of hours duty officer scheme for emergency situations.

Food Related Service Delivery Points		
Location	Service Area	Office Hours
City Hall Cathays Park Cardiff	Food Hygiene & Port Health, Health Improvement including Communicable Diseases, Food Administration for all food related services, Health & Safety, and Licensing functions	Mon - Thurs 08:30 - 17:00 Friday 08:30 - 16:30
Public Analyst Crofts Street Cardiff	Cardiff Scientific Services/County Analyst Public Analyst function, food analyst and analytical services for local Councils, Industry and the public	As above
Level 1 County Hall Atlantic Wharf Cardiff	Trading Standards: -Business Services - Commerce & Projects and Consumer Fraud – food standards, food labelling, feed safety, feed standards, primary producers, animal health, Consumer advice and education	As above

The Cardiff Council website provides information on the services provided and the website address is www.cardiff.gov.uk.

External Factors Impacting on the Service

Events - Capital City status brings with it extra demands and challenges. The City hosts many outdoor events across a wide range of venues. The time spent planning, organising, monitoring events and inspecting and sampling at food premises during events each year should not be underestimated.

Collaboration - During 2014/15 Cardiff Council intends to consider the benefits of Regulatory Services across three council areas (Cardiff, Bridgend and the Vale) being delivered under a single management structure. *(The term Regulatory Service embraces the Trading Standards, Environmental Health and Licensing functions).*

If approved the move to a single management structure will be incremental over a three year period. In the first year, the collaboration will align the Trading Standards and some Environmental Health functions. Initially, it is envisaged that some financial savings through collaborative procurement will be realised, but the most likely benefits are a sharing of expertise and staffing resources leading to improved services for citizens and the business community and greater resilience across the region to deal with Regulatory risks.

Regional Collaboration Funding has been secured to resource the project development. The funding covers the costs of project management, property services, additional management responsibility, legal and HR costs.

FSSNET – the authority is currently using FSSNET for food standards samples- a national food sampling database which reduces the amount of time to complete sample forms and enables officers to have access to national sampling intelligence. The County Analyst service is already online, however the Public Health Wales microbiology laboratory is not. In 2013/14 the use of FSSNET has been successfully trialled for entering microbiological food samples onto the database. The benefits of this system have not been realised because the Public Health Wales microbiology food laboratory is still not fully integrated with the system leading

to duplication of data entry at present. Once this has been resolved we will be in a position to move forward with the new scheme.

Financial - The continuing financial difficulties faced by all local authorities has required implementation of remedial measures to offset budgetary deficits. This has had an impact on the delivery of food services over the last 2 years by the deletion of a Trading Standards Operational Manager position, a Group Leader, two Fair Trading Officers and an assistant Fair Trading Officer from Trading Standards, an 1.7 Environmental Health Officer posts from the Public Protection team and a number of administrative posts affecting all teams. In addition income targets have been increased.

Food Hygiene Rating (Wales) Act 2013 – this legislation became effective in November 2013. It requires all relevant food businesses to display their food hygiene rating sticker and also requires all local authorities in Wales to implement the Act. During 2014/15 the Council is required to migrate premises that had a rating under the non-statutory scheme across to the mandatory scheme. This will involve either giving a rating following a full inspection or giving a new rating based on the non-statutory rating. The scheme will also be extended in November 2014 to trade to trade businesses and so promotion of this change with affected businesses will need to take place.

As the new legislation starts to take affect there will be a need for enforcement of the requirement to display a rating sticker. This will mean service of a fixed penalty notice or possibly prosecution. We will also continue to deal with appeals against ratings and carry out re-rating visits following applications from food business owners that have made improvements. Since the legislation came into effect, the authority has received 32 requests for re-rating which must be undertaken within 3 months of the request.

Food Information Regulations – These Regulations are coming into force during the year and will have a substantial effect on all food businesses. Takeaways for example, will now have to declare all allergens in their food. The Regulations will also have a significant impact on caterers who hitherto have been exempt from many labelling requirements so there will be a considerable resource issue in educating and enforcing the new requirements.

The Horsemeat Scandal – this high profile, wide-reaching food incident was discovered in January 2013 and has rarely been out of the headlines since. Conducting regular checks into meat speciation has become one of Trading Standards priorities both for 2013-14 and 2014-15 with an emphasis on meat and meat products procured by the authority in 2013-14. Meat fraud continues to be discovered – lamb kebabs containing little or no lamb, lamb curries also containing no lamb. Out of the 16 lamb kebabs sampled by Trading Standards, 10 were mis-described, containing undeclared meat from other species and little or no lamb. This is a failure rate of 62.5%.

Stray Horses – in 2008 the authority developed a strategy to deal with the problem of stray horses within the authority and the post of Horse Warden was created and rests within Trading Standards. Gradually this area of work has grown exponentially and routinely involves up to a quarter of trading standards officers and is now having a substantial effect on the rest of Trading Standards work, including food and feed enforcement. A report is in the process of being prepared to be presented to cabinet regarding this problem area which shows no sign of abating.

Increasing Service Demand - During 2013/14, the Service received 289 food hygiene (inc food safety) complaints, 212 Food Standards complaints and 4 feed complaints.

The numbers of complaints received during the last 3 years show a rise in both food hygiene and food standards complaints with the number of food standards complaints increasing by approximately 35% over the previous year. This is in part due to the more accurate recording of information and a general increase due to the economic climate where consumers are less likely to let small losses slide. It is also possible that as a result of the horsemeat scandal, there is more awareness of food fraud and trading standards often see an increase in food standard complaints following articles in the media. See graph Section 6.

2.5 Enforcement Policy

Fair and effective enforcement is essential to protect the economic, environmental and social interests of the public and business. Decisions about enforcement action and in particular the decision to prosecute, has serious implications for all involved and for this reason, the Food and Feed Service has adopted an Enforcement Policy that ensures that :-

- Anyone affected by enforcement action understand what principles are applied when such action is considered;
- Decisions about enforcement action are fair, proportionate and consistent;
- Officers apply current government guidance and codes of practice when considering any formal action;
- A proper scheme of accountability is in place.

The Enforcement Policy adopted reflects the principles of proportionality, targeting, consistency, transparency and accountability. The policy sets out our current approach to law enforcement and is based upon the principles espoused by the Enforcement Concordat, the Regulators Compliance Code and has regard to current government guidance.

3

Service Delivery

3.1 Interventions at Food and Feeding Stuffs Establishments

It is the policy of Cardiff Council to ensure that food and feed businesses within its jurisdiction receive interventions e.g. inspections in accordance with the Food Law and Feed Law Codes of Practice and Practice Guidance. This requires local authorities to have a programme of interventions which is adequately resourced and provides sufficient information to show that businesses are complying with food law.

Food Hygiene Interventions

The planned programme for food hygiene interventions is shown below. The programme is based on the requirements of the Code of Practice and Practice Guidance. Following inspection all food businesses are risk rated from A (highest risk) to E (lowest risk). An intervention is required in accordance with that risk rating.

Official controls are required at prescribed frequencies for risk categories A-C and category D premises. However, Category D interventions can alternate between an official control, e.g. a full inspection, or a visit by non Environmental Health Officer.

Low risk food premises (Category E) need not be subject to an inspection, however they must be subject to an alternative enforcement strategy not less than once in any 3 year period, this could include a postal questionnaire.

In addition, since the **Food Law Practice Guidance (Wales)** was revised in February 2012 all new food businesses should receive an inspection within 28 days of opening or registering. With a high turnover of premises in Cardiff this has been and continues to be a challenge to achieve.

While the Code of Practice allows E rated businesses to be subject to interventions other than a full inspection, the introduction of the Food Hygiene Rating Act means that all food businesses within scope of the Act should receive an inspection in order to be given a hygiene rating.

For the year 2014/15 the chosen intervention will be full inspections for all businesses rated A and B, non-broadly compliant (i.e. equivalent to a food hygiene rating of <3) C's and new businesses. However current resources will not allow inspection of all broadly compliant C's or remaining D and E rated businesses. To mitigate the risk of not inspecting these businesses, alternative strategies will be used. This will involve information gathering visits by the Sampling Officer and the use of postal questionnaires with appropriate follow up action taken where necessary.

Resources currently do not allow the service to inspect all new businesses within 28 days. All businesses which are unrated as of 1st April 2014 will receive an inspection during the year.

As outlined above in 2014/15 it is intended that council officer resources will be directed to address non-broadly compliant C rated premises and unrated premises with the aim of achieving a position where unrated premises are generally inspected within 28 days.

The table below shows the percentage of high risk businesses that were due for a programmed inspection and inspected for food hygiene in previous years, and the plan for the year ahead.

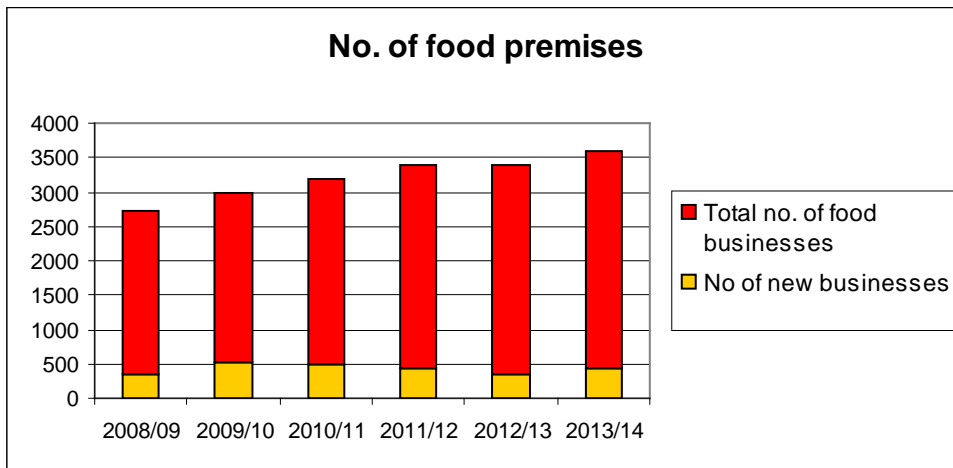
Food Safety Intervention Plan									
Risk Category	Inspection Frequency	Number of Inspections Due at Start of Year (Including any Backlog)							
		2008/9	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	
HIGH RISK	A	6 mths	128	138	154	114	86	84	54
	B	12 mths	426	454	494	438	294	271	262
	C	18 mths	779	713	878	716	856	748	1018
	C Not broadly compliant	18 mths	See above	See above	See above	See above	See above	See above	141
	C Broadly compliant	18 mths	See above	See above	See above	See above	See above	See above	877
	'High Risk' Total		1333	1305	1526	1268	1236	1103	1334
	% Achievement		100%	99.54%	100%	100%	100%	85.98%	
MEDIUM-LOW RISK	D	2 years	155	73	177	129	249	373	412
	E/ AE S*	3 years	278	266	190	99	212	295	331
	'Medium to low Risk' Total		433	339	367	228	461	668	743
	% Achievement		100%	31.25%	77.99%	63.45%	32.18%	41.17%	
NEW BUSINESSES	Unrated (New business identified at 1 April)		56	135	166	216	130	224	56
	% Achievement		100%	95.15%	100%	100%	100%	100%	
	Unrated (New business identified during course of year)		356	420	380	437	348	444	Est 444
	% Achievement		63.76%	66.90%	43.16%	75.51%	51.72%	87.61%	
APPROVED PREMISES	Primary		5	1	Inc above	Inc above	Inc above	Inc above	Inc above
	Secondary		9	-	-	-	-	-	
TOTALS (excluding new businesses identified during year)			1836	1780	2059	1712	1827	1995	2133

Source: Planned Inspection Monitoring Programme

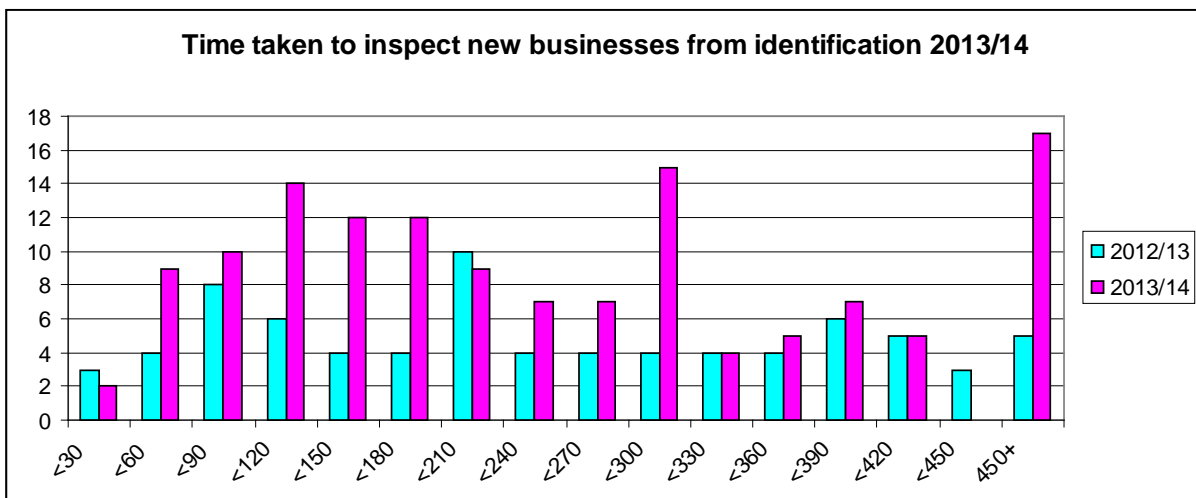
Inspection of New Businesses

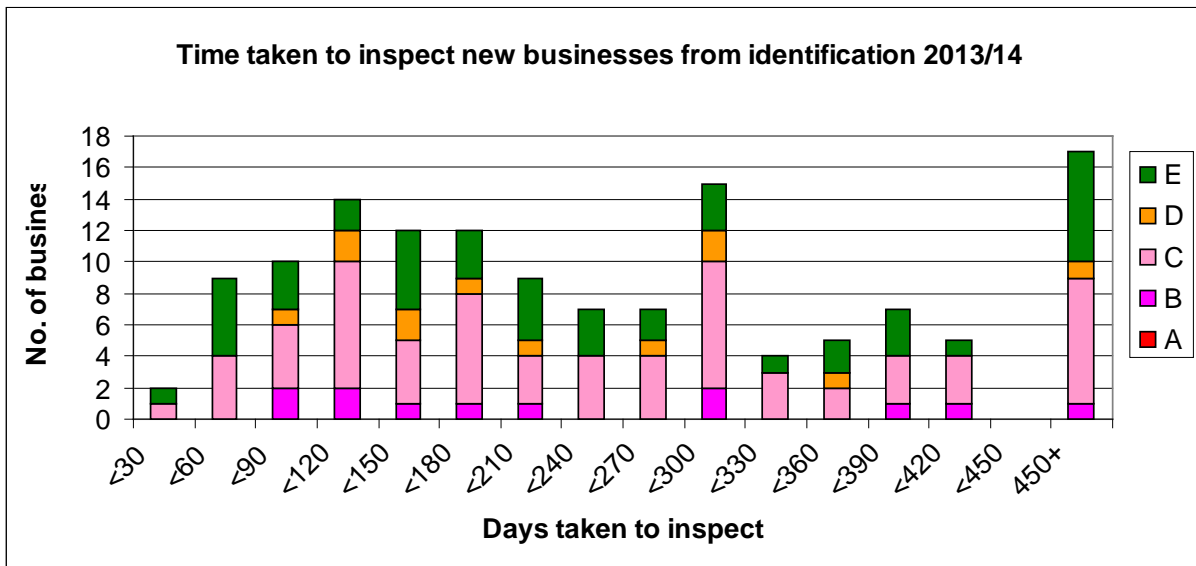
Cardiff has a high turnover of business ownership which presents a challenge for the Food Safety Team over and above the routine inspection programme. During 2013/14, 444 new premises were identified which represents 14% of the total number of food premises in the City.

The following graph shows the number of food businesses including the number of new food businesses opening each year.



On the 1 April 2013 there were 224 unrated premises, i.e. new businesses requiring inspection. The graph below shows the time taken to inspect the business from identification. This does not include premises that were found to be closed at the time of inspection. It can be seen that there are significant delays. Comparing results from the previous year, there has been little change in the delay being experienced however there has been a significant increase in the number of businesses inspected.





Previous plans have indicated that despite not being able to assess these new businesses within 28 days, desk top assessments would be undertaken to identify the high risk premises and those inspections would be prioritised. The graph above demonstrates that this system has not been completely effective in being able to identify high risk premises at an early stage. However this situation should improve significantly in 2014-15 with resources being directed towards inspecting new food businesses and the significantly lower number of new businesses being carried forward into 2014/15 (56 compared to 224 in the previous year).

Alternative Enforcement Strategies for low risk premises (E rated)

Under the Food Law Code of Practice, low risk food hygiene premises need not be subject to an inspection, however they must be subject to an alternative enforcement strategy intervention not less than once in any 3 year period. Officers undertaking alternative enforcement strategies are not required to meet the qualification requirements for carrying out food hygiene inspections, but any visits undertaken by unqualified officers must be confined to information collection and reporting back. Subsequent actions or interventions must be carried out by a qualified officer. Within Cardiff the strategy involves a postal questionnaire being sent out. The information received allows assessment of the current level of compliance with food hygiene legislation and highlights any changes to the business. Where changes in management, activities or serious deficiencies are identified a Senior Environmental Health Officer will inspect.

In 2014-15 questionnaires will be used for all broadly compliant E rated premises and all non-broadly compliant E rated premises will receive an inspection.

Interventions for D Rated Premises

Premises that have been awarded a D risk category for food hygiene should be subject to an intervention every 2 years. However, this intervention can alternate between an official control, e.g. a full inspection, or a visit by a non-Environmental Health Officer.

In 2014-15 interventions other than a full inspection will be considered dependant on resource. This will involve the Sampling Officer carrying out information gathering visits

using a standard questionnaire. All non-broadly compliant D rated premises will be inspected.

Interventions for C Rated Premises

Premises that have been given a C risk category for food hygiene should be subject to an intervention every 18 months. However in broadly compliant C rated premises this intervention can alternate between a full inspection, partial inspection or audit and other official control visit.

As current resources do not allow us to visit all broadly compliant C rated premises a risk priority exercise will be undertaken to allow targeting of available resources at those considered highest risk, with an inspection. This will involve consideration of the activities of the business, the time since last inspection and any intelligence e.g. complaints received.

Migration to Statutory Food Hygiene Rating Scheme

The Food Hygiene Rating (Wales) Regulations allow for a transition period for local authorities to give a new statutory rating to those businesses that were given a rating under the old non-statutory scheme.

Therefore during 2014/15 we will need to identify all those businesses that were given an old rating and will not be inspected during the year either due to lack of resource or because they are not due for inspection. These will then be migrated across and given a new rating based on their old rating. These will also have a right of appeal and so a phased approach will be taken e.g. sending out 5 ratings first then 4 etc. in order to spread out the workload.

Food Hygiene Revisits

Inspection of premises often requires follow up visits to ensure compliance with food safety requirements. During 2012/13 Cardiff officers supported the development of a revisit policy which was subsequently agreed at the Food Technical Panel. Cardiff has adopted this policy.

Imported foods

During the inspection of food premises, officers consider the origin of imported foods. Any indications that food may not have been subject to correct import controls are investigated and, where necessary, the food is removed from the food chain.

Port Health Functions

The Port of Cardiff provides an entry point for food stuffs within and outside the EU and local authorities carry out a range of health controls at UK borders. Within Cardiff, these controls are provided by Port Health Officers from Cardiff Council's Food Safety Team who enforce regulations on behalf of central government. The responsibilities of these officers include monitoring the safety of imported food and feed at the point of import, the control of infectious disease, undertaking ship inspections, enforcing food safety and hygiene standards and general public health within the Port District.

The Port Health Service Plan outlines the work undertaken in relation to the Authority's Port Health functions including food safety.

Food Standards

Trading Standards enforce food standards, a legislatively complex area covering meat speciation, composition, labelling, claims, allergens, chemical contamination (such as heavy metals and carcinogens such as mycotoxins), compositional standards (such as meat content), additives, food fraud and genetically modified ingredients and foods. It also covers articles that come into contact with food and ensuring that there is no transfer of chemicals including carcinogens.

Primary producers are the initial growers and manufacturers of all food commodities such as meat, grains, eggs, honey etc. and the most common primary producers are farms. As with food and feed businesses, primary producers have to register with the authority (in this case Trading Standards) and are subject to the same controls as more regular food and feed businesses.

Trading Standards use the LACORS risk assessment model and the Food Safety Act Food Law Code of Practice. This double risk rating is necessary because the two food enforcement sections look at different aspects of food safety and good compliance in one aspect does not necessarily imply good compliance in another. 99% of food premises identified as high risk for food standards were inspected. Inspections were also undertaken on types of food businesses such as takeaways. In total 914 food premises were visited by trading standards in 2013/14.

Feed Safety

The BSE health scare during the last two decades revealed the fundamental link between the feed we give to animals and our own health. This is also borne out by the recent dioxin scare where contaminated oil was fed to chickens and pigs in Germany and affected eggs ended up in a manufacturer based in Cardiff. Consequently feed safety is now considered a fundamental part of food safety and is enforced by Trading Standards.

The controls are similar to those relating to food. Trading Standards maintains a register of feed businesses and inspections are completed according to their risk rating. Additional work has been conducted to identify food businesses who also supply the animal feed chain through their waste stream and they were inspected and added to the register.

Food Standards inspections for premises are divided into four categories, namely High, Medium, Low and Non Inspectable Risk. The Council's inspection targets are shown in the table below.

Food Standards Inspection Programme 2014/15		
Category	Inspection Frequency	Inspection Target at Beginning of Year 2014/15
High Risk	Once every year	126

Medium Risk	Once every two years	444 ***
Low Risk	Once every five years	152 ***
TOTAL		722

***For 2014/15, Trading Standards will inspect 50% of medium risk food premises by way of standard inspections and food standard based projects will target a further 20% of low risk premises by questionnaire.

3.2 Food and feed Complaints

There are occasions where unsafe practices or potential risks come to light as a result of a complaint or concern raised by a member of the public or employee and these are treated as complaints. Following a complaint an Officer will carry out an investigation to verify the existence of the problem and where necessary seek to minimise the risk.

Support from the Public Analyst and Public Health Wales Laboratory is needed to complete investigations which place a financial implication on service provision. Approximately 90% of complaints received by trading standards require the procurement of samples which are not part of the sampling programme. Furthermore approximately 10% of samples examined require further investigation.

3.3 Home Authority Principle/Primary Authority Scheme

The Home Authority Principle applies to businesses with outlets in a number of local authority areas. The aim of the scheme is to improve consistency in the way local authorities enforce food safety in a company throughout the country. A Home authority is an authority that acts as a focal point for liaison in food issues between a company and other local authorities that have outlets in their local authority area. Cardiff Council supports the scheme and currently 24 food standards premises are covered by the Scheme.

The Primary Authority Scheme builds on the foundations created by the Home Authority Partnership Scheme but entails a shift in the nature of the relationship between the regulated and the regulator bringing benefits to both parties. It offers local authorities the opportunity to develop a constructive partnership with a business that can deliver reliable advice and coordinated and consistent enforcement for the business and provides new funding arrangements, allowing local authorities to recover costs from partner businesses. The Primary Authority Scheme is mainly of benefit to businesses with outlets in a number of local authority areas. The partnership is a legally binding agreement that provides assured advice, ensures consistency of regulation between local authorities and reduces duplication of inspections and paperwork

The Primary Authority Scheme is intended to replace Home Authority.

The advice given by the Primary Authority must be adhered to by other local authorities. The primary authority can block enforcement if the enforcing authority has not considered the advice the Primary Authority has given. The Primary Authority may also develop inspection plans which enforcing authorities must follow.

Cardiff Council does not currently have any Primary Authority agreements in place although consideration will be given to any expressions of interest from business. Notwithstanding this however, the Council will adhere to the requirements of the Scheme as follows:-

- Where Cardiff Council as an enforcing authority has concerns about the compliance of a business that has a primary authority, it will discuss the issue with the primary authority at an early stage.
- If enforcement is envisaged Cardiff Council will notify the primary authority of the proposed enforcement action.
- Cardiff Council will follow published inspection plans and will only deviate if initially discussed with the Primary Authority or events during a visit require this

3.4 Advice to business

Cardiff Council aims to assist businesses wherever possible by providing food and feed safety advice through a variety of channels, such as :-.

- Advice provided as part of the inspection process;
- Responding to complaints and requests for service;
- A variety of information leaflets are available (A Food Safety Management Pack has been developed in house);
- The provision of training and seminars;
- Participation in national events, such as Food Safety Week;
- Participation in working groups, such as Events Liaison Panel;
- Through Cardiff Council's website.
- Regular Food Business Forums
- Practical targeted training at business premises
- Free food hygiene advice visits available to new food businesses
- Free food standards advice available to all food businesses

3.5 Food and Feed Sampling

Food sampling is important in helping protect public health and safety by testing foods to ensure they meet composition, labelling, chemical and microbiological safety standards in accordance with current Codes of Practice and guidance. Proactive sampling is undertaken in the following situations:-

- National, regional and locally co-ordinated surveys/programmes;
- Local food and feed producers;
- Home and originating authority samples;
- Complaints;
- Process monitoring;
- Special investigations;
- Imported foods and feed;
- Inspections;
- Durability;

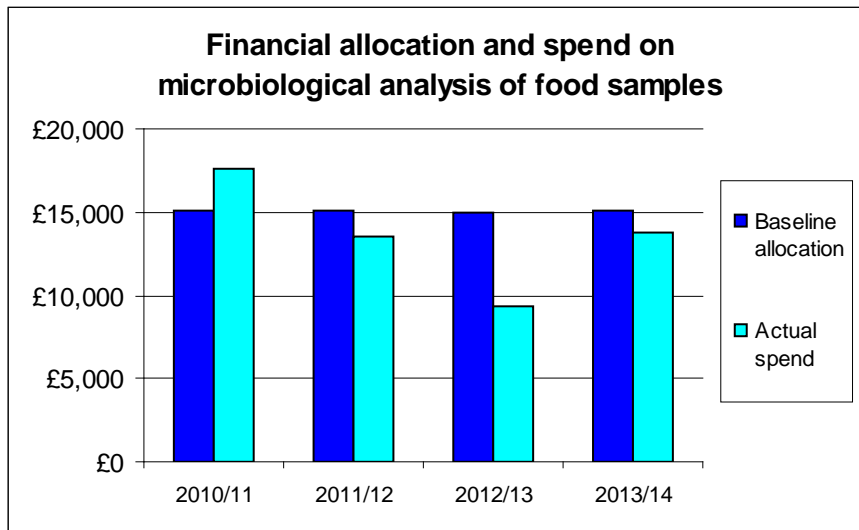
- Surveillance/screening;
- Water quality monitoring aboard ships and approved premises.
- Foods procured by the authority will be checked for compliance not only with legal standards but the specifications of the contract. This will include meat specification.

Food Hygiene Sampling

Sampling to secure the safety of food involves testing food and water for microbiological, chemical, physical and/or radiological parameters (refer to attached plan).

The policy is largely determined by the authority’s participation in proactive schemes co-ordinated through agencies such as the Food Standards Agency (FSA), Public Health Wales, Local Government Regulation (previously LACORS), Welsh Food Microbiological Forum (WFMF) and Health Protection Agency (HPA). End product testing at approved establishments and high risk premises also constitutes an important element of the proactive work undertaken by the authority. Reactive sampling arrangements cover food importation, food poisoning outbreaks and the investigation of water and food complaints. Approximately 50 food safety complaints are received per annum. Water monitoring arrangements are in place for product specific premises and potable water on ships.

Each year Cardiff Council receives a budget allocation for microbiological analysis of samples from Public Health Wales. In 2013/14 631 samples were collected and submitted to Public Health Wales for analysis. In addition, the Food Standards Agency provided funding for a project looking at chicken purchased from food businesses in Cardiff linked with confirmed cases of Campylobacter food poisoning



The majority of informal food samples taken for surveillance and monitoring purposes will be assessed using the criteria contained in the “Guidelines for Assessing the Microbiological Safety of Ready-to-Eat Foods Placed on the Market”, revised HPA Guidance 2010 and Microbiological Criteria for Foodstuffs (EC Regulation 2073/2005). Most of these samples will be of an informal nature but the provisions of the Food Law Code of Practice will be followed when formal samples are required e.g. where a prosecution could result.

Food Standards Sampling

Incidents in the food chain are becoming increasingly common and are often as a result of chemical contamination. Some of the most dangerous chemical contaminants belong to the mycotoxin family – specifically aflatoxin B1 which is one of the most carcinogenic substances known. It affects animals as well as humans and has been found in milk from cows that have been fed aflatoxin contaminated feed. In recent years Trading Standards have targeted their food and feed sampling towards mycotoxin sampling.

Following on from the horsemeat scandal Trading Standards prioritised sampling meat products from authority procured meat and meat products as well as from food businesses and having them analysed for meat speciation. This work showed evidence of problems in takeaways where over 60% of kebab samples did not contain the meat they were alleged to contain. Meat speciation in curries has also been found to be problematic elsewhere, this will form part of the Cardiff programme in 2014/15.

Infestation of figs and dates has been a significant area of concern during the year: Nine samples of figs were taken of which all but two were infested – a failure rate of 78%. 37 samples of dates were taken and 24 were found to be infested – a failure rate of 65%

All food standards and feed samples have their labels and descriptions examined to ensure compliance and the majority are also analysed. Common labelling problems found include foreign labelling, misleading origin claims, particularly “welsh” claims, and a lack of labelling on beef.

Feed sampling will be increased generally in line with the feed enforcement priorities from the FSA.

Sampling Programmes 2014/15

Sampling programmes for both Food Hygiene and Food Standards can be found as appendices.

The total Trading Standards budget for sampling foods for 2014/15 is £54,000. A bid for £21,635 has been submitted to the Food Standards Agency to fund some additional trading standards sampling projects.

3.6 Control and investigation of outbreaks and food related infectious disease

All cases of communicable disease in Cardiff are investigated by the Communicable Disease Team. This includes the investigation of all notified confirmed and suspected cases and outbreaks of food poisoning and food borne disease. These investigations are supported by the Food Safety Team who undertake inspections of food businesses, carry out food, water and environmental sampling of implicated premises and deliver bespoke training where required.

The Wales Outbreak Plan 2012 lays out the approach to managing outbreaks of food poisoning and is followed by all 22 local authorities in Wales including Cardiff, in partnership with Public Health Wales and Food Standards Agency. The Plan is overseen by the Welsh Government and prescribes the manner in which outbreaks are identified, managed and controlled.

The investigation of cases and outbreaks of food poisoning by the Communicable Disease Team routinely includes:-

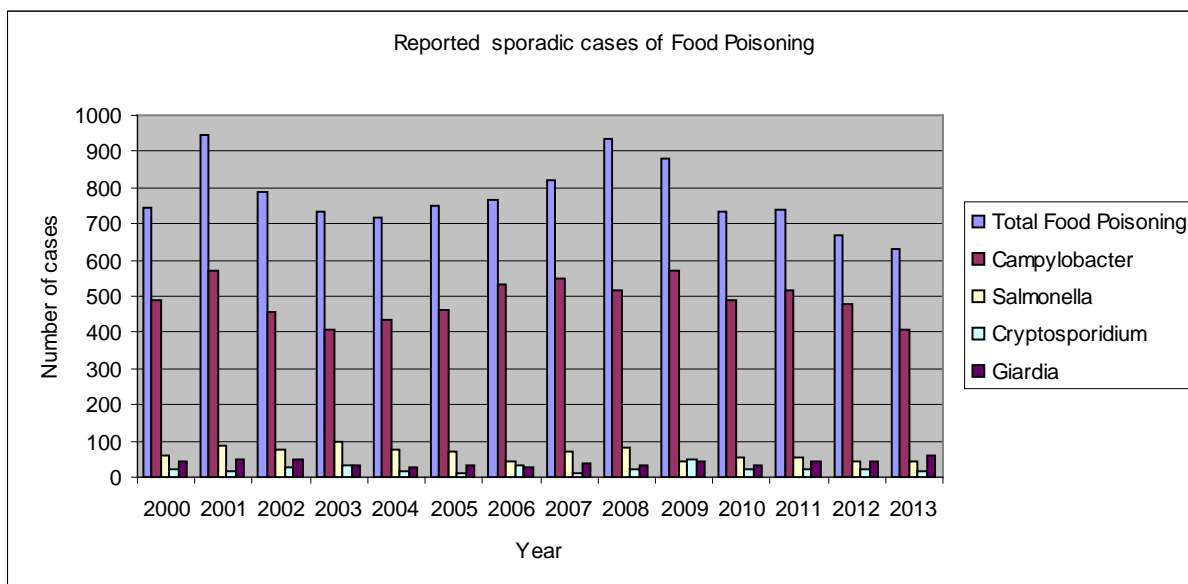
- The receipt and verification of laboratory confirmed isolates and unconfirmed reports of food poisoning from, Public Health Wales Microbiological Laboratories, Medical Practitioners, cases, employers, other local authorities and less commonly masters of vessels visiting the port and their agents;
- Telephone and face to face interviews with cases, liaison with GP surgeries, hospitals and Public Health Wales, pursuing exclusions of cases and contacts from the workplace, schools and health care settings, site visits and the provision of infection control advice ;
- The collection, analysis and reporting of data relating to food poisoning;
- The investigation, management and control of outbreaks of communicable disease where food or water is, or is thought to be, the vehicle of infection.
- Taking the lead on and contributing to local and national communicable disease surveillance programmes such as Campylobacter enhanced surveillance, Giardia and Cryptosporidium national surveillance programme and Hepatitis E enhanced surveillance.

For all sporadic cases and small, or medium size outbreaks (up to 50 cases), the staffing resources provided by the Communicable Disease Team are sufficient, however for larger outbreaks, staff in the Health and Safety and Food Safety Teams would be made available for interviewing cases and collection of specimens. For certain outbreaks comprising a significantly greater number of cases, or cases of greater severity or longevity, environmental health staff based in other teams would be trained and used in the data gathering and investigation process.

During 2013, the Service was notified of 630 cases of food poisoning of which 94 (15%) were unconfirmed cases. All but 2 cases (<1%) were investigated within the nationally agreed target response times.

The graph below shows the trend in the most commonly reported cases of food poisoning in Cardiff over the last thirteen years. Food poisoning cases have decreased in the last three years although cases of Giardia and suspected food poisoning increased in 2013. However not all cases of Giardia are the result of foodborne transmission, environmental and person to person spread are also important modes of transmission and this years increase is the result of person to person spread within affected families. In the case of suspected food poisoning of the 94 notified cases 43 (46%) responded to enquiries which resulted in 17 businesses being referred to food safety for further action which included a business closure and a range of formal and informal interventions.

Reported Cases of Food Poisoning in Cardiff; 2000-2013



Campylobacter remains the most common food poisoning in Cardiff and the U.K. Of the 405 cases reported in 2013 341 (84%) were acquired in Cardiff, 56 (14%) cases reported eating commercially prepared chicken during their incubation period of these 9 food businesses were considered to be the probable cause of illness and were referred to the food safety team for further action. In the majority of campylobacter cases (349, 86%) the cause of infection was either associated with preparation or consumption of chicken in the home or environmental contamination. Fifty percent of cases interviewed reported changing the method of handling, preparing or cooking chicken in the home as a result of officer advice. The most common poor practice reported was washing chicken before cooking. The 2014 Food Safety week in June will focus on promoting safe practices associated with preparing and cooking chicken both in the home and in food businesses.

In addition to the ongoing investigation of all sporadic cases of food poisoning in 2013 there were 20 outbreaks of communicable disease in Cardiff and a further 7 outbreaks that occurred outside Cardiff but involved residents of Cardiff. In these circumstances the same level of investigation and control is required except management of the outbreak is coordinated by the local authority whose area the outbreak occurred. An outbreak is one affecting two or more people who share a common exposure factor (such as time, place or person).

Of the 20 outbreaks, 5 were associated with restaurants of which 3 were suspected Norovirus associated with the consumption of oysters and the remaining 2 were also associated with suspected Norovirus outbreaks but investigation identified environmental or person to person spread as the vehicle of transmission rather than food. All 20 outbreaks were contained within the population at risk, none spread to the wider community, the result of timely investigation and application of prevention and control measures.

Of the 7 outbreaks that occurred outside Cardiff 4 were confirmed: 2 Salmonella, 1 Campylobacter and 1 Hepatitis A, part of a national outbreak.

3.7 Feed/Food Safety Incidents

The Food and Feed Safety Service will on receipt of any food alert respond in accordance with the Food Safety Act Food Law Code and Practice and Practice Guidance and the Food Standards Agency.

A Product Withdrawal Information Notice or a Product Recall Information Notice is issued where a solution to the problem has been put in place – the product has been, or is being, withdrawn from sale or recalled from consumers, for example. A Food Alert for Action is issued where intervention by enforcement authorities is required.

Alerts requiring substantial reactive action will occur occasionally and irregularly. Sufficient resources will be allocated to deal with each warning as it arises, although this may require diversion from the planned programme of inspection.

3.8 Liaison with other organisations

Liaison is an appropriate mechanism for ensuring consistency between enforcers, for sharing good practice, for sharing information and for informing other enforcers of potential difficult situations. The main liaison arrangements in place & regularly used are as follows:-

- Liaison with the Food Standards Agency;
- Liaison with the Directors of Public Protection Wales Food Safety Expert Panel; Quality and Communicable Disease Expert Panels, Wales Heads of Trading Standards Food Panel;
- Participation in the Directors of Public Protection Wales Regional Liaison Group, the Glamorgan Group Food Panel, the Glamorgan Group Farm Compliance Panel;
- Participation in a working group comprising of the Food Standards Agency, Chartered Institute of Environmental Health, Local Authorities, STS Solutions and representatives from the care industry to develop national guidance for the control of listeriosis;
- Participation in a working group comprising of the Food Standards Agency, Chartered Institute of Environmental Health, John Basset Consulting, British Retail Consortium, British Hospitality Association, Food Hygiene Focus Group, National Federation of Meat and Food Traders, Federation of Small Businesses and Local Authorities to review and revise E.coli O157 Cross Contamination Guidance;
- Liaison with professional bodies such as the Chartered Institute of Environmental Health, the Royal Society of Health, the Royal Institute of Public Health and Hygiene, the Trading Standards Institute.
- Liaison with and commitment to Better Regulation Delivery Office (BRDO)
- Advisory groups, e.g. Food Hygiene Focus Group.
- Commitment to the Welsh Food Microbiological Forum;
- Liaison with other Council services such as Planning and Building Control to inspect and review applications, Procurement and Schools Service;
- Liaison with the PH Wales Environment Sub Group and the Infection Control Committee and the Cardiff Health Alliance;
- Liaison with Maritime and Coastguard Agency;
- Liaison with stakeholders at the port including port operators;
- Participation in the Directors of Public Protection Wales Port Health Expert Panel;

- Member of the Association of Port Health Authorities and the Ports Liaison Network;
- Welsh Government;
- Local Government Data Unit.

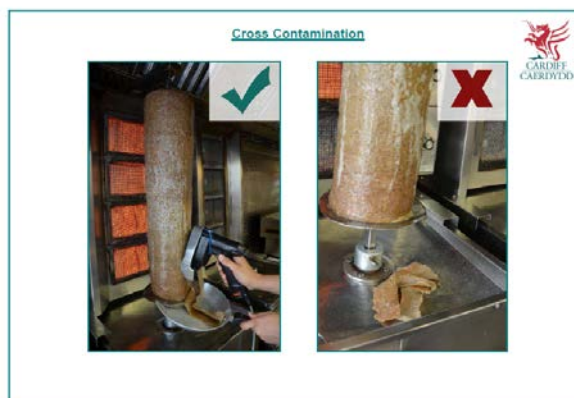
3.9 Food and Feed Safety Promotion

The Food and Feed Service within Regulatory Commercial Services is committed to promoting a positive food safety culture through a variety of channels. Promotion of food and feed safety will generally involve:-

- Provision of advice and information to businesses and members of the public through inspections, complaints and notifications;
- Provision of Food Hygiene training courses to both Level 2 and 3;
- Delivery of HACCP training ;
- Provision of training courses in other languages based on local need;
- Production of Food Safety management training manual.
- Leaflets covering food and feed issues;
- Participation in national events such as Food Safety Week;
- Food Safety Business newsletter;
- Promotion of Food Hygiene Rating Scheme;
- Delivery of the nutritional award scheme in place in partnership with the Food Standards Agency;
- Key partner on the Food and Health Steering Group developing the Cardiff Food and Health Strategy;
- Guidance to assist businesses in the care sector such as childminders, after school clubs, nurseries and play groups;
- Booklets produced for food businesses starting up;
- Advice through Cardiff Council’s website;
- Targeted education, advice and seminars.
- Where possible interventions and promotional activities are evaluated to learn how they can be improved for next time.

In 2013/14 three Food, Safety & Health Business Forums were delivered for local food businesses. The Forums promote good working relationships, a positive safety culture and provide advice and guidance for local food businesses.

Two projects trialling an alternative approach to improving food hygiene standards in poor performing food businesses were undertaken between May 2012 and February 2013. Food businesses were recruited and they received on-site practical, interactive food hygiene training in relation to cross contamination, temperature control, cleaning and hand washing.



These projects were evaluated during 2013 /14 and results showed marked improvements in knowledge and practices in the 4 food safety areas assessed. The observed improvements were the result of the practical application of the training and also empowering businesses to gain control over their own practices through education in raising consciousness of food hygiene issues.

4

Resources

4.1 Financial allocation

The estimated financial expenditure on food and feed safety for 2013/14 is demonstrated in the following table. Legal charges are part of a central recharge and cannot be separately calculated. Investment in and renewal of information technology assets is funded centrally following a bid process based on the development of a business case.

TABLE 11 – BUDGET DETAILS								
	Budget 2013/14				Budget 2014/15			
	Food Safety and Port Health	Food Poisoning	Trading Standards	TOTAL	Food Safety and Port Health	Food Poisoning	Trading Standards	TOTAL
Staffing	840,820	73,381	250,804	1,165,005	768,340	73,381	231,282	1,073,003
Travel / Subsistence	23,760	2,318	4,544	30,622	23,760	2,318	4,662	30,740
Sampling	17,690	0	90,000**	107,690	16,310	0	72,000**	88,310
Supplies	26,600	3,964	8,990	39,554	27,680	3,976	13,964	45,620
Income	-204,040	-7,252	-23,458	-234,750	-204,040	-7,252	-23,324	-234,616
TOTALS	704,830	72,411	330,880	1,108,121	632,050	72,423	298,584	1003,057

*Table subject to change as budgets being finalised at time of writing.

** Includes all Trading Standards Sampling budgets required for other consumer work.

4.2 Staffing allocation

The table below summarises the estimated staff demand identified for the core functions within the Food and Feed Service. Staff numbers are shown in terms of full time equivalent posts (FTE).

Food and feed safety activity staff demand				
Para.	Function	Food Safety	Trading Standards	Total [FTE]
3.1	Premises Inspection	14.0	1.75	14.75
3.2	Food & Hygiene Complaints	2.00	0.10	2.10
3.3	Home/Primary Authority	0.20	0.30	0.50
3.4	Advice to Business	1.15	0.30*	1.45
3.5	Food and Feed Sampling	1.00	1.50*	2.50
3.6	Food Poisoning	2.20	0.00	2.20
3.7	Food Safety Incidents	0.50	0.50	1.00
3.8	Liaison	0.15	0.10	0.25
3.9	Food & Feed Safety/Standards Promotion	1.00	0.10	1.10
4.2	Management	1.80	0.35	2.15
4.2	Administration	2.50	0.20	2.70

Totals [FTE]	26.05	5.40	30.70
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*this denotes anticipated increase in workload due to problems found and the implementation of the Food Information Regulations which replace the Food Labelling Regulations 1996

The table below indicates the actual number of staff working on Food and Feed safety and related matters (in terms of full time equivalents FTE). Levels of qualification are expressed with reference to the appropriate Food Safety Act Food Law Code of Practice and Practice Guidance, including support staff. Included in the Senior Environmental Health Officer numbers are the 2 FTE also carrying out Port Health duties.

FOOD SAFETY			
Position	Function	Qualification	FTE
Assistant Director Environment	Management of Environmental Health, Trading Standards and Waste functions		0.05
OM Regulatory Commercial Services	Includes management of public protection functions - food hygiene, port health and food poisoning and Trading Standards	Environmental Health Officer (EHORB registered)	0.60
Group Leader (Food)	Food safety management and liaison.	Environmental Health Officer (EHORB registered, competent to inspect all categories)	1.00
Team Leader (Health & Safety and Communicable Disease Team)	Community Health including food poisoning and liaison	Environmental Health Officer(EHORB registered)	0.60
Senior Environmental Health Officers	Food safety inc 2 FTE for Port Health	Environmental Health Officer(EHORB registered, competent to inspect all categories)	15
Senior Environmental Health Officers	Community health (food poisoning and infection control)	Environmental Health Officer(EHORB registered)	0.50
Technical Officer	Sampling	Advanced Certificate in Food Hygiene	1.00
Technical Officer	Community health including food poisoning	BA Hons Environmental Health	0.60
Administrative Staff	Administrative Support		2.50
TOTAL (FTEs)			21.85

There is a shortfall of 4 FTE food safety officers needed to meet the food safety inspection programme. The 15 Senior Environmental Health Officers in the table above includes 2 FTEs for Port Health and 2 Assistant Group Leaders in the Food Safety Team.

TRADING STANDARDS			
Position	Function	Qualification	FTE
Group Leader (Technical and Performance)	Management of Food standards and feed safety	Trading Standards Officer (Food Standards Certificate)	0.30
Group Leader (Commercial)	Co-Management of Food standards	Trading Standards Officer (Food Standards Certificate)	0.05

Trading Standards Officer	Food standards and feed	Trading Standards Officer(Food Standards Certificate)	1.55
Fair Trading Officer	Food standards and feed	DCA Food and Agriculture paper	1.25
Higher Clerical Assistant	Administrative support		0.05
		TOTAL (FTEs)	3.20

There is a shortfall of 2.2 FTE officers within trading standards needed to enforce food standards and feed safety within the authority.

4.3 Staff Development Plan

Cardiff Council has adopted and implemented a Personal Performance and Development Scheme. The scheme requires line managers to identify personal objectives and to assess training needs for staff. A six monthly review is undertaken to monitor progress and end of year review to establish final outcomes and set new objectives for the forthcoming year. The information is recorded on a central database.

Continuing Professional Development (CPD) is actively encouraged and officers attend a wide range of training courses, seminars, meetings and briefings to help maintain competency and improve technical, legal and administrative knowledge. The Chartered Institute of Environmental Health and the Trading Standards Institute have mechanisms in place to monitor CPD. In addition all staff have been encouraged to complete the BRDO development tool Since April 2012. This helps to identify specific technical development requirements.

Regular food safety and standards training is carried out in house. At least one internal training session will take place each year.

All officers within the Food Safety team receive training in respect of new food legislation and how it relates to establishments involved in the supply of products of animal origin. This is an ongoing process and officers will receive further training and guidance as required.

The Service also recognises the need for full technical support to be available to all Food and Feed Officers and this is achieved through a variety of ways, including internet subscription and library.

5

Quality Assessment

Regulatory Commercial Services recognises the need to measure the effectiveness of its food and feed safety duties and strongly supports the ethos of continuous improvement. The Service therefore participates and undertakes a number of activities to ensure that work is of a high standard and opportunities to identify and implement improvements are taken.

Documented procedures

To ensure the quality and consistency of our activities, processes, procedures and work instructions for Food and Feed enforcement activities are documented and published electronically on the Council's CIS System.

Documented procedures identify responsibility for the work carried out and ensure that all changes identified through audit are carried out in accordance with improvement procedures. Activities such as inspections, administration, accident investigation and complaint administration can be accessed by all staff via the CIS and are audited internally for compliance.

Cardiff Council was for a number of years registered with BSI and the documentation of our procedures and work instructions originated from the need to fulfil requirements for this Standard. In recent years the Council discontinued its BSI registration but despite this, the good work undertaken within the service has continued. The benefits of a quality management system are embedded within the service and as such continue to document and internally audit procedures accordingly.

Assessment and audits

The monitoring of the quality of our policies and procedures is assessed in a number of ways, namely:-

- Internal audit of documented procedures and work instructions via internal audit;
- Peer Review audits by other local authorities
- Audits undertaken by the Food Standards Agency.
- Customer consultation and feedback;
- Review of corporate complaints and compliments about the service.

During 2013-14 audits were carried out of all food safety procedures.

Regulatory Commercial Services is committed to continuous improvement using various management tools for identifying opportunities for improvement and has subjected itself to external assessment via the Wales Quality Awards. More recently, the service has used 'lean management' techniques to review processes and procedures which require the mapping out and examination of processes to identify more efficient and effective working practices.

In 2013/14 the Food Standards Agency carried out an audit on the Council's service in relation to traceability and authenticity of shellfish.

Customer consultation and feedback

We are committed to involving customers in the continuous improvement of services and recognise the need to have structured methods of obtaining service users views and perception of the service. In 2013/14 these included:-

- A questionnaire sent to food business operators following each planned food hygiene inspection visit asking a series of questions to gauge the employers satisfaction with the enforcement service. *For 2013/14, 98% of respondents said that the food hygiene inspection helped them to improve food hygiene standards and 98% were very satisfied or satisfied with the overall level of service they received.*
- A questionnaire sent to service users who had submitted a food complaint to gauge their views on the handling of the complaint. Unfortunately this questionnaire generated an extremely low response during 2013/14 and as a consequence the results do not provide a sufficient sample size for analysis.
- Questionnaires sent to Trading Standards business customers following an inspection and to service users who have submitted consumer complaints. Results for these questionnaires, cover all Trading Standards services.
- Consultation via the website;
- Feedback facilities via dedicated email address.
- Corporate complaints and compliments;

6

Review

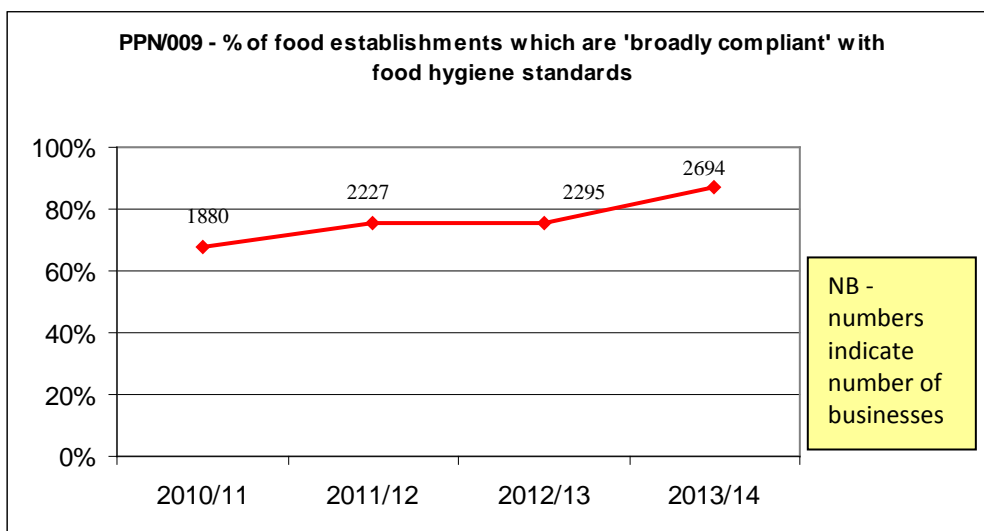
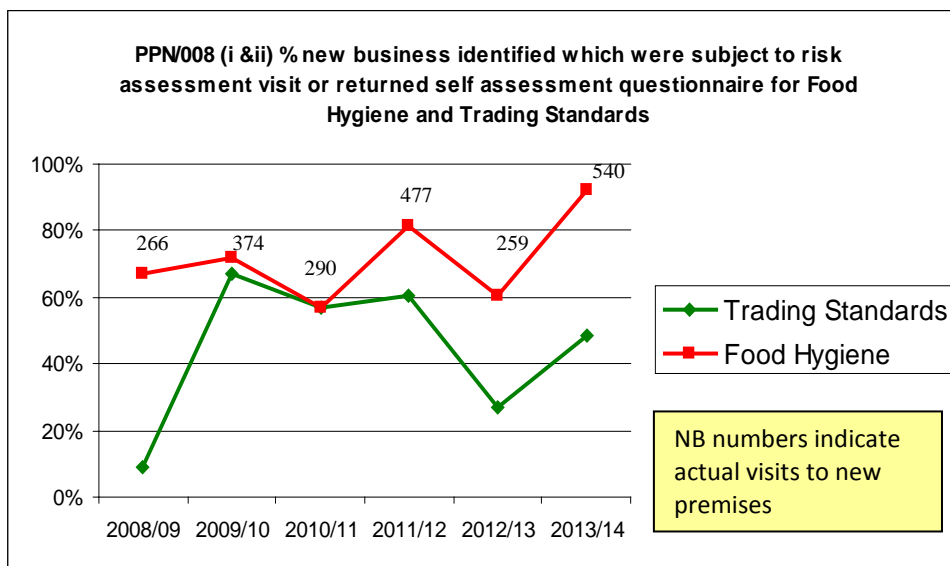
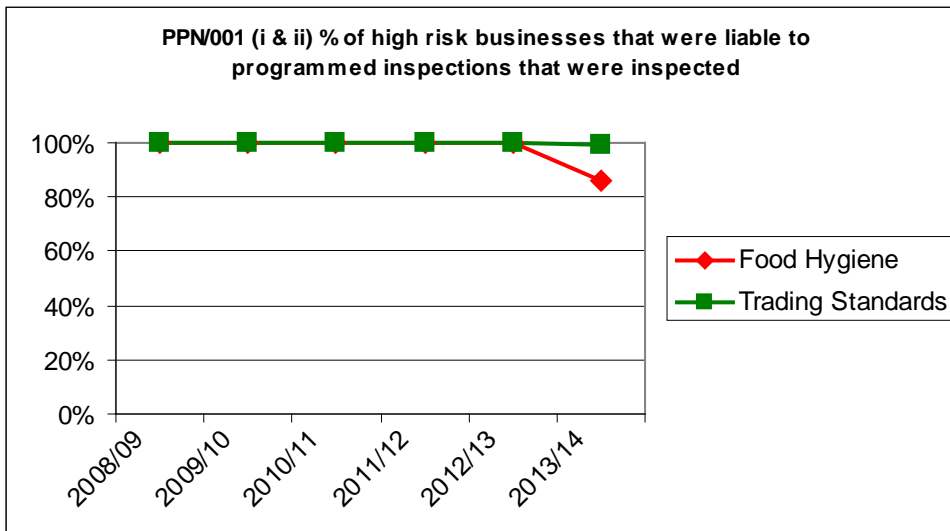
6.1 Review against the Service Plan

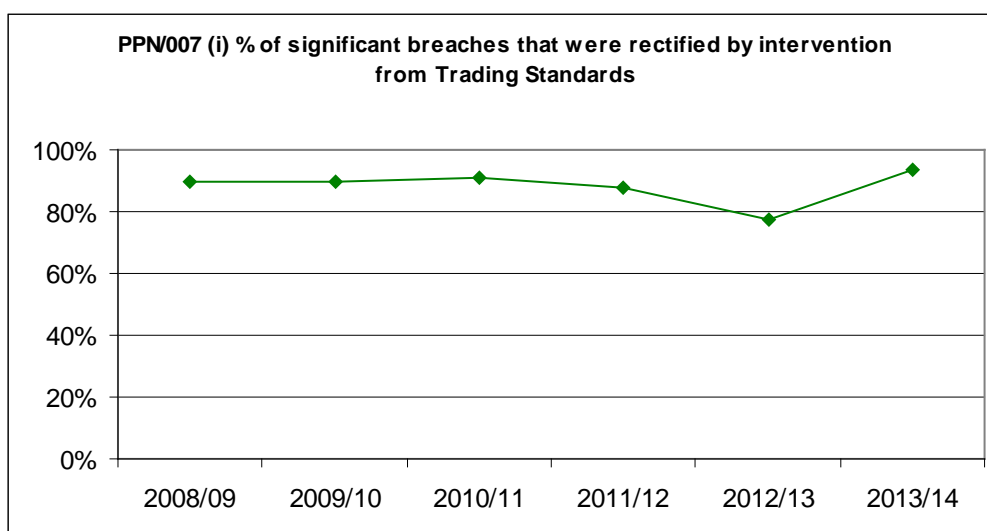
In order to ensure continuous improvement it is essential that performance is regularly monitored. Cardiff Council has an effective performance management infrastructure in place for developing, delivering, monitoring and reviewing interventions which is undertaken through the following mechanisms:-

- The Public Protection Committee approves this Service Plan which sets out the work programme for the service and reviews performance against the programme on an annual basis.
- Performance of the service is considered at team and divisional meetings on a monthly basis. Performance against Welsh Government Performance Indicators is reviewed at quarterly Business Improvement Meetings and subsequently through a framework of management review meetings.
- Section and Divisional meetings allow for the effective management of work and are also one of the routes of communication that allow individual and team involvement in the development and delivery of interventions.
- Performance of individuals is managed through the Personal Performance and Development Scheme detailed in Section 4.
- Procedures and work instructions are managed through the Cardiff Improvement System (CIS) accessed via the intranet and is used to manage the programme of audits, opportunities for improvement, complaints and non conformance.

Performance measures

The only current Welsh Government performance indicator relevant to Food Safety is PPN/009, however other performance indicators previously used by Welsh Government have been retained and are reported on internally. The following graphs show the results for the last 6 years.





In addition to these performance measures, and to provide a greater understanding of the work of the teams and the relevant outcomes, all teams within Regulatory Commercial Services have developed Performance Report Cards based on the Results Based Accountability approach that provide an overview of the type of work they undertake and relevant outcomes. The Food Safety Report card, records progress against Corporate and Business Plan objectives, together with the following performance indicators:-

How much?

- No. of food safety inspections.
- No. of people trained in food safety.
- No. of complaints about food/food businesses investigated.

How well?

- % of high risk inspections.
- % of businesses rated under the Food Hygiene Rating Scheme.
- % of Food Hygiene Rating Scheme appeals dealt with within one week.

Is anyone better off?

- % of broadly compliant premises.
- % of proprietors that feel inspection helped them improve food hygiene standards.
- % of businesses improved as a result of Food Hygiene Rating Scheme rescore appeal.

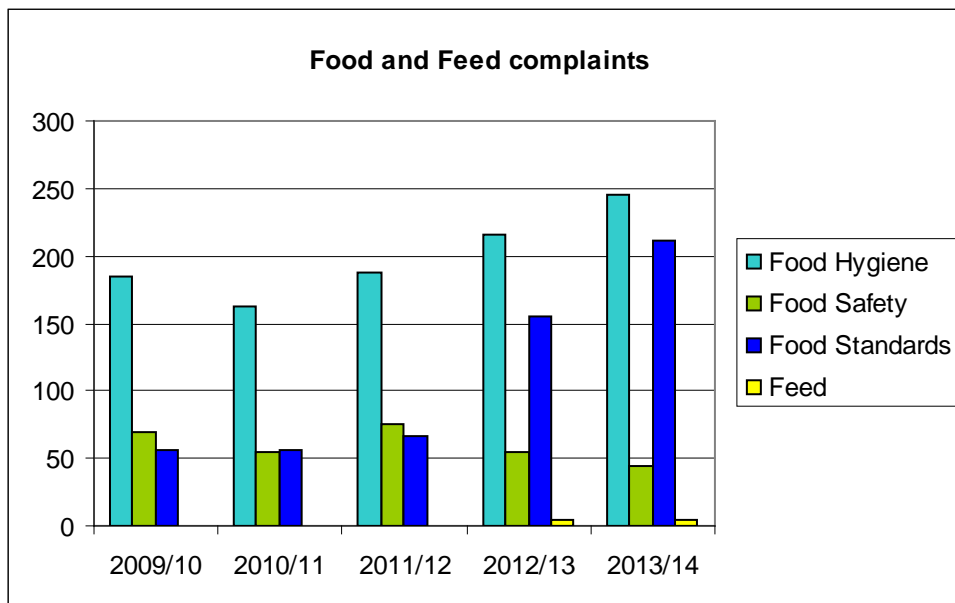
The service also collates additional information on the activities that help establish service demand such as complaints, number of premises, etc.. The results of which can be found in the following table.

There are currently 3152 food premises in Cardiff which are subject to local authority enforcement. During 2013/14, enforcement measures taken included 1402 informal notices, and 6 Improvement Notices

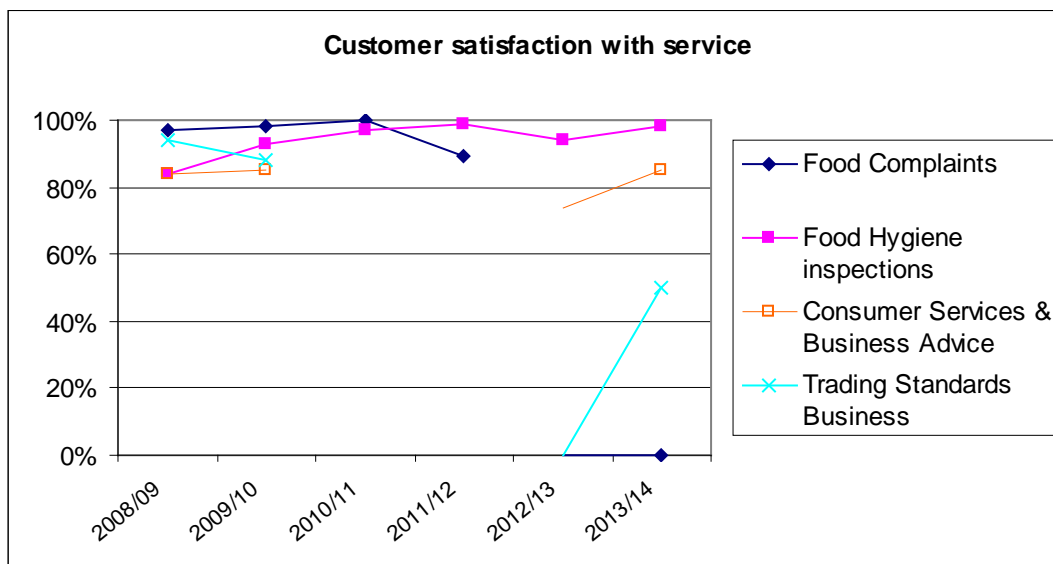
Statistical information	2009/10		2010/11		2011/12		2012/13		2013/14	
	FH	FS	FH	FS	FH	FS	FH	FS	FH	FS
No. of food premises	2463		2672		2947		3038		3152	
No. of new businesses opened	518		506		437		389		444	
No. of communicable disease cases	1063(2009)		860(2010)		867 (2011)		851 (2012)		700 (2013)	

No. of food poisoning cases.	881(2009)		735 (2010)		737 (2011)		669 (2012)		630 (2013)	
Inspections and visits										
No. of inspections and audits	1870	468	2007	605	1965	659	1903	199	1855	187
No. of verification and surveillance visits	1571	168	1716	134	1439	376	1338	295	1240	250
No. of sampling visits	226	22	225	34	179	52	142	141	202	277
No. of advice and education visits	118	0	72	0	101	0	226		191	20
No. of information/intelligence gathering visits	275	0	452	0	366	0	274		409	0
No. of assessments made under the Food Hygiene Rating Scheme			1427		1588		2353		2698	
% of premises which have been assessed under the Food Hygiene National Rating Scheme since launch					77.03 %		77.30 %		85.60 %	
Enforcement										
No. of premises closed (voluntary)	22	0	22	0	17	0	10		17	0
No. of seizures, detention and surrendered food	5	0	7	0	4	0	2		3	4*
Emergency Prohibition Notice (Formal)	0	0	0	0	2	0	0		0	0
Prohibition Order	0	0	0	0	0	0	1		0	0
Simple caution	1	0	4	0	1	0	1		0	**
Improvement notice	52	0	48	0	48	0	32		6	0
Written Warnings	1396	27	1625	0	1551	0	1372		1402	15** *
Prosecutions	8	0	0	0	3	0	4		3	0
Sampling										
No. of food samples	1095	521	1274	521	656	1046	436	636	585	558
No. and % of unsatisfactory samples	124 (11.3 %)	54 (10.3 %)	134 (10.5 %)	86 (16.5 %)	54 (8.23%)	148 (14.1 %)	43 (9.86%)	169 26.6 %	97 16.58 %	201 36%
Alerts										
No. of food alerts	39 (31 FAFI, 9 FAFA)		43 (25 PRIN, 2 PWIN, 4 FAFA, 12 FAFI)		36		40		42 (29 PRIN, 3 PWIN and 9 FAFA.)	
No. of food alert visits	31	41	10	11	0	34	31	63	4	14
* 3 condemnation orders and 1 product recall										
** Still conducting the investigations but 10 investigations into misdescribed lamb kebabs which may results in simple cautions or written warnings.										
***9 failed formal samples of figs and dates and 6 where the informal failed but it was not possible to take a formal resulting in 16 written warnings.										

505 service requests (complaints) were received in total and all were investigated. The table below shows a breakdown of the type of complaint received.



Questionnaires are sent to service users notifying the authority about poor hygiene or food safety, to gauge their satisfaction with the service. Results are very positive. Questionnaires are also sent to Trading Standards business customers following an inspection and to service users who have submitted consumer complaints or businesses seeking advice to gauge their views. These results however relate to all Trading Standards services and do not apply to food standards only. Some results for Trading Standards and Consumer Services are unavailable and this is reflected in the graph, however following a review of the questionnaires in 2012, results were resumed in 2012/13 onwards.



Achievements

Bids for Funding

A joint bid by the Food Safety Team and Trading Standards for FSA grant funding was successful for sampling projects. The Food Safety Team secured £1,760.70 to undertake a food and environmental sampling survey of food premises where cooked chicken products had been identified as a risk factor during surveillance of confirmed Campylobacter cases. This project was undertaken in partnership with the Communicable Disease Team. A joint bid of 25,635 has been submitted to the FSA for 2014/15.

The Food Safety Team was awarded a Welsh Government grant of £5000 for the implementation and enforcement of the statutory food hygiene rating scheme. The scheme has been implemented successfully. Businesses who have not complied with the requirement to display rating stickers in a conspicuous place have received informal verbal and written warnings.

Successful bids for FSA grant funding for two projects to support businesses. £2100 was secured for translating the Council's Food Safety Management System into 6 languages. £2410 was secured for holding two food business forums to provide information on the new statutory food hygiene rating scheme and how to achieve a good rating.

Trading Standards are again one of the few authorities selected to take part in the EC international survey into horsemeat substitution. This activity will be undertaken in 2014/15.

New food businesses

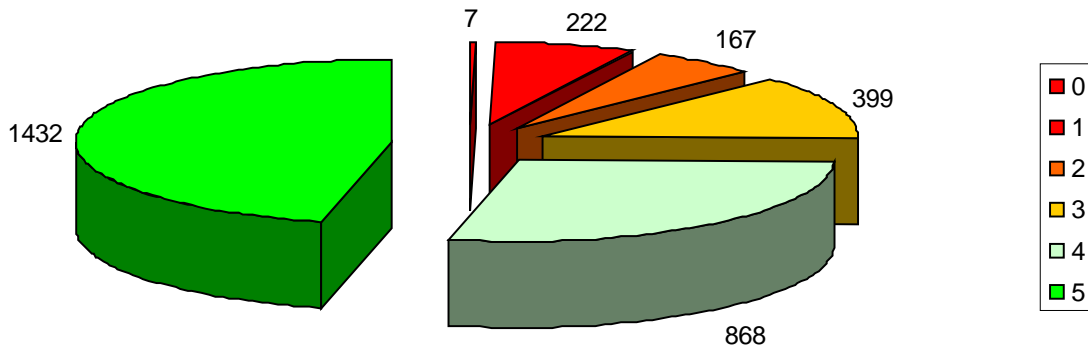
The Sampling Officer within the Food Safety Team carried out 64 visits to new food businesses in order to provide advice on how to comply with the hygiene regulations. Any complex activities were referred to environmental health officers.

Food Hygiene Rating Scheme (FHRS)

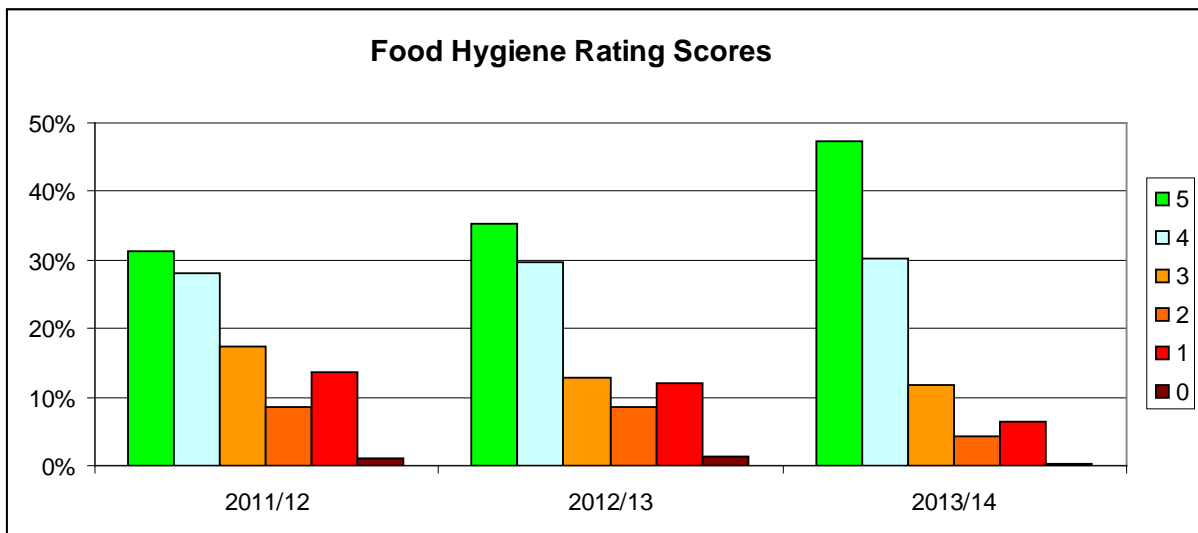
On 1st October 2010 the FHRS was introduced in Cardiff. As premises have been inspected they have received a hygiene rating. In November 2013 a statutory scheme was introduced throughout Wales.

The following chart highlights the number of premises inspected together with their rating. Since the Scheme was launched 85.60% of premises have been assessed under the Food Hygiene Rating Scheme.

Food Hygiene Ratings for Cardiff Businesses 31st March 2014

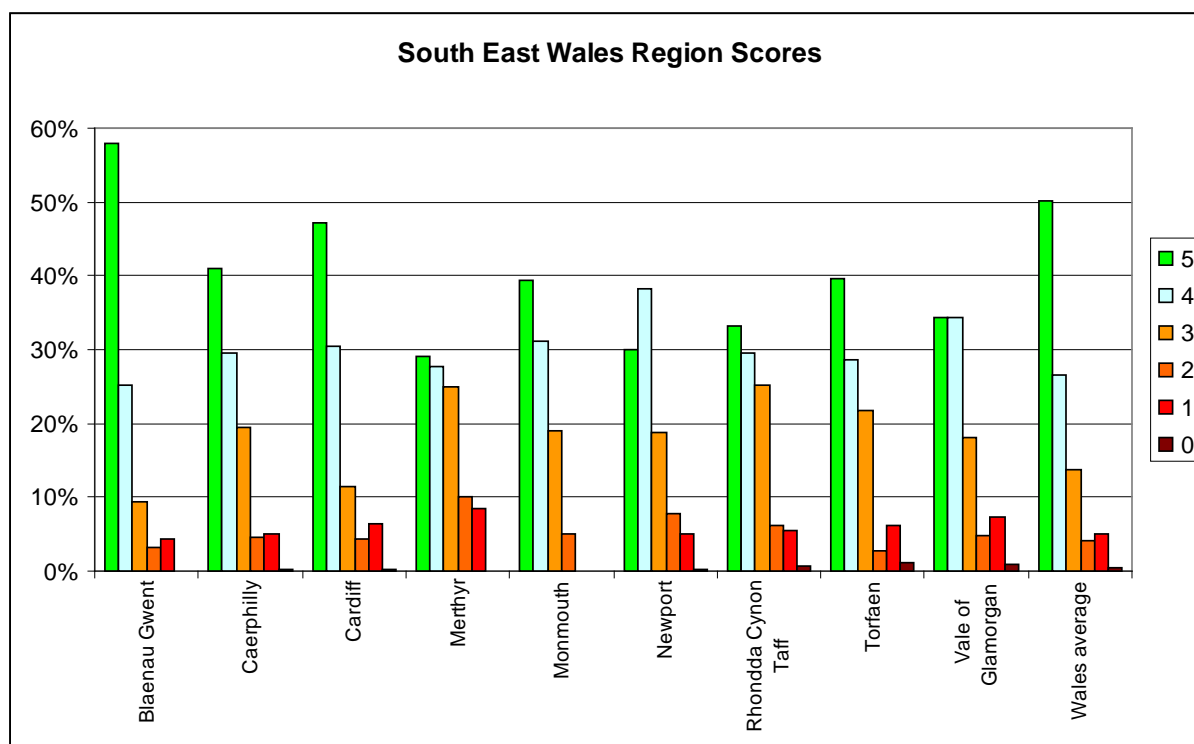


The Scheme has had a positive impact in improving standards in food businesses and the following graphs demonstrates how over a 3 year period the percentage of businesses that have been granted a '5' rating, the highest rating that can be achieved, has increased. Similarly the number of low scoring businesses has dropped.



Cardiff's position within Wales is favourable falling only slightly below the Welsh average score. This is a significant achievement given the unique nature of Cardiff as a capital city and the high volume of food businesses and business turn over compared to other Welsh

authorities. The following chart shows results for authorities in the South East Wales region and the Welsh average.



Food, Safety & Health Business Forum

The Food, Safety & Health Business Forum continued to go from strength to strength with a number of services participating. In April 2013, a Business Forum was held in County Hall and nurseries and childminders across the City attended. Two further forums were held at City Hall in November 2013 to explain the new legislation relating to the Food Hygiene Rating Scheme in Wales and the impact these would have.

Food Business Newsletter

The Food Safety Team has continued to produce its newsletter. An evaluation of its effectiveness was carried out during 2012, by consulting with food business owners and with officers. This resulted in the name of the newsletter being changed from 'Health Matters Newsletter' to 'Food Business Newsletter' it was felt this better described the nature of relevance of the newsletter. In 2013-14 one issue was produced and officers distributed it by hand at routine inspections. It was also emailed where email addresses of businesses were available. In 2014-15 other ways of communicating with food businesses will be explored such as use of social media e.g. Facebook.

Managing E.coli risk within the Council

Significant progress has been made to address the E.coli risk to the Council, however, there is a need to maintain this momentum to embed new corporate procedures to ensure full compliance. In 2014/15 the council adopted a Corporate Food Safety Management System. The system has been supported by a comprehensive training programme during the year and an E-learning package is being developed which will allow ongoing training needs to be met.

The Horsemeat Scandal

This high profile, wide-reaching food incident was discovered in January 2013 and has rarely been out of the headlines since. Trading Standards were one of only two Welsh authorities asked to take formal samples on behalf of the FSA – one of which has proved positive for horsemeat. Trading Standards were also tasked by members to sample across the authority's premises including schools and leisure centres. Over 250 samples were taken in a period of less than four weeks but no problems were found. Conducting regular checks into meat speciation has become one of Trading Standards priorities. In 2014/15 the Service will again participate in the European Union survey into horsemeat substitution.

Food Hygiene Intervention Programme

Planned High Risk Food Hygiene Inspections (Risk Category A-C)

The Service faced a number of challenges during 2013/14 despite this an overall high risk inspection rate of 85.98% was attained against a target of 100%.

Other Planned Food Hygiene Interventions (Risk Category D-E)

An overall intervention rate of 41.17% was achieved for category D and E premises.

Unrated Premises

100% of premises which were unrated on the 1 April 2013 were inspected during the year. The number of new businesses being carried forward has reduced from 224 in April 2013 to 56 in April 2014 demonstrating significant in year progress. However, the requirement to inspect new businesses within 28 days has not been achieved

Broadly Compliant Premises

The percentage of food premises which were deemed to be broadly compliant with food hygiene law i.e. rated a 3 or above, increased during the year to 87.27% (excluding unrated premises) or 85.71% (including unrated premises). This is in part the positive impact of the implementation of the Food Hygiene Rating Scheme which encourages many businesses to strive for a better rating. Once improvements are made businesses request a revisit to be rescored.

6.2 Identification of any variation from the Service Plan

The mechanisms in place to review performance enable remedial action to be put in place should any shortfalls against targets or plans occur during the year. Consideration will be given to the various factors that may contribute to any shortfalls and whether additional resources, re-allocation of staff resources or re-prioritisation of workload is required to resolve any problems. Any issues that may not have been resolved at the end of the year will be included in the Service Plan for the following year.

The performance against the food safety intervention plan for 2013/14 has been outlined in detail above. It was recognised at the time of plan adoption that resources were insufficient to deliver the full requirements of the Food Law Code of Practice. In year budget management strategies compounded the resource issue. However, in light of the reduced

resource available decisions were made regarding new priorities which included inspection of all A, B and non broadly compliant C premises. All these premises were inspected. Any high risk premises due for inspection but not inspected as part of the programme for 2013/14 have been included in the programme for 2014/15.

Cardiff Council received an allocation of £15,092 for microbiological analysis of food and water samples from Public Health Wales. The specific sampling surveys identified in the Sampling Plan were delivered but the allocation was not fully spent. The end of year spend was £13,782.73 (91.3%). The main reasons for the under spend was a decision by the Welsh Food Microbiological Forum to end sampling surveys before the end of the financial year and the Sampling Officer's involvement in other priorities. In addition, analysis of some samples taken were funded from an alternative source- the Food Standards Agency.

The 100% inspection target for high risk food standard businesses was not met – 99.5% were inspected due to unpredicted staff shortage. Desktop audits were conducted where possible and the outstanding premises will be inspected by the end of May 2014.

6.3 Areas for improvement

As part of the annual review process, any areas for improvement will be identified and included in the Plan and/or the Service Area Business Plan with such improvement encompassing areas such as :-

- Improvements to working practices;
- New projects or initiatives;
- Greater partnership working;
- Improvements in efficiency and effectiveness.
- Promotion of food issues.
- Greater focus on outcomes.

As a result of a review of the service, the following opportunities for development are identified for 2014/15.

Food Safety

- Continue to implement and enforce the statutory Food Hygiene Rating System including migration of all businesses included in the scheme from the voluntary to the mandatory scheme..
- Actively lead on the Corporate E.coli Action Plan. Continue to undertake activities with other council departments in order to ensure the safety of food provided in Council run premises. In particular finalise the e-learning training tool regarding the Corporate HACCP document.
- Continue to prioritise new businesses for inspection.
- Continue to address the backlog of E rated premises by utilising the Alternative Enforcement Strategy.
- Monitor the time between registration and inspection of new businesses in order to assess the prioritisation of inspection of new businesses.
- Bid for grant funding in order to carry out practical on-site training as a method of improving standards in poorly performing business in identified areas of the City.

- Continue to improve the now established arrangements for engaging with business i.e. local food business forum and set up a Food Safety Team Facebook page.
- Food sampling activities will focus initially on a shopping basket survey and then identified national and local concerns relating to food safety. In addition, in line with Food Standards Agency microbiological priorities, sampling of chilled high risk ready to eat food in care environments will be undertaken to determine the presence and level of *Listeria monocytogenes*. Sampling will also be undertaken to support grant funded food hygiene interventions.
- Promote the uptake of food safety management systems by businesses in order to improve their hygiene ratings through coaching visits/mailshots. Consider area based initiatives to achieve this.
- Work in partnership with local businesses to ensure food safety resilience during the NATO conference.

Food Standards

- Continue to ensure that unrated and low rated food premises are assessed via a combination of self assessment questionnaires and inspection.
- Ensure all food qualified officers are kept up to date with changes in legislation via a combination of internal and external training courses and workshops.
- Review the food incident procedure to ensure that co-products, which are products derived from food manufacture including waste food that enter the feed chain, are included.
- Continue the process of registering feed businesses and share intelligence with other authorities about the types of businesses supplying the feed chain especially those supplying co-products.
- Increase the number of competent level 1 feed officers within the service to help deal with the increasing number of feed businesses.
- Review the use of the Civica Authority database (Flare) and the codes used and provide clearer guidance to officers
- Encourage officers to become food and/or feed qualified

Communicable Disease

- Development of enhanced surveillance studies to focus investigation of various types of food poisoning.
- Develop health improvement programmes to provide infection control training to high risk groups.
- Evaluation of food safety management systems in partnership with businesses.
- Comparison studies for specific pathogens with other local authorities, and
- The development with other partners of the Wales Communicable Disease database and disease surveillance system

Appendices

- A. Food Safety Sampling Plan
- B. Local Public Health Strategic Framework (relevant sections)
- C. Food Standards Sampling Plan

Appendix A - Food Safety Sampling Plan

SAMPLING PLAN 2014/2015							
Microbiological (M) Chemical (C) Physical (P) Radiological (R)							
Product	Type	Analysis	Analyst	Duration	Sampling Rate	Approx samples/premises	Estimated samples/year
SURVEILLANCE MONITORING							
End Product Testing High Risk Premises	M	Aerobic Colony Counts & Food Pathogens	PH Wales	Ongoing	Bi-Annually July14 & Jan 15	Variable	100
Food Poisoning Outbreaks	M	''	PH Wales	Ongoing	As required	Variable	50
Premise Specific Sampling (Surveillance)	M	''	PH Wales	Ongoing	As required	Variable	50
Imported Foods (Port & Inland)	M	''	PH Wales	Ongoing	As required	Variable	30
	C	Various Contaminants & Pesticides	CSS	Ongoing	As required	Variable	20
SPECIFIC SURVEYS							
Proposed survey of sandwiches supplied to smaller retailers in Cardiff (Bid submitted to FSA)	M	Aerobic Colony Counts (ACC) & Food Pathogens inc Listeria monocytogenes	PH Wales	July 14 to Mar 15	Approx 13 per quarter	Variable	40
Survey of Paan & Curry leaves sold from retailers in Cardiff	M	Aerobic Colony Counts (ACC) & Food Pathogens inc Salmonella, Listeria & E.coli	PH Wales	July 14 to Mar 15	Approx 5 per quarter	Variable	20
Proposed Welsh Food Microbiological Forum Surveys (To be agreed)	M	Aerobic Colony Counts & Food Pathogens	PH Wales	June 14 Onwards	As per protocols	Variable	100
Survey of rte chilled foods e.g. sandwiches stored and served in care settings (in line with FSA priorities)	M	Aerobic Colony Counts & Food Pathogens inc Listeria monocytogenes	PH Wales	June 14 to November 14	Approx 4 per week	Variable	50

Welsh Food Microbiological Forum Shopping Basket Survey	M	Aerobic Colony Counts & Food Pathogens	PH Wales	Apr 14 to May 14	Approx 5 per week	Variable	40
Proposed sampling survey to support a food safety initiative (bid submitted)	M	Aerobic Colony Counts & Food Pathogens	PH Wales	To be decided	To be decided	Variable	40

SAMPLING PLAN 2014/2015 continued

Microbiological (M) Chemical (C) Physical (P) Radiological (R)

Product	Type	Analysis	Analyst*	Duration	Sampling Rate	Approx samples/ Premises	Estimated samples/ year
PRODUCT SPECIFIC PREMISES (Vertically Approved)							
Meat Products (4)	M	ACC & pathogens	PH Wales	Ongoing	Bi Annually July 13 & Jan 14	Variable	20
Fishery Products (2)	M	"	PH Wales	Ongoing	Bi Annually July 13 & Jan 14	Variable	10
Meat Preparations (2)	M	"	PH Wales	Ongoing	Bi Annually July 13 & Jan 14	Variable	10
WATER MONITORING							
Product Specific Premises (8)	M	Total Coliforms & E.coli	PH Wales	Ongoing	Annual	Variable	10
Special Events Waters	M	Total Coliforms & E.coli	PH Wales	Ongoing	Variable	Variable	20
Pool Waters	M	Total Coliforms & E.coli	PH Wales	Ongoing	Variable	Variable	70

Appendix B – Local Public Health Strategic Framework



Priority Area 5: Food

<p>LOCAL PUBLIC HEALTH PLAN 2014/15-2016/17</p> <p>PRIORITY AREA: Food LEAD OFFICER: Eryl Powell (029 2033 6222) PARTNERSHIP LEADS: Alan Billinghamurst, Bethan Jones, Karen Trigg, Sue Eakers, Carole Tyley</p>	<p>HEADLINE PERFORMANCE INDICATORS OR TARGETS</p> <ul style="list-style-type: none"> • % of adults reported being obese or overweight • % of 4/5 year olds obese or overweight • % of adults who eat at least five portions of fruit and vegetables a day • % of food businesses which are "Broadly Compliant" with food law and participate in the National Food Hygiene Rating Scheme
<p>STORY BEHIND THE PRIORITY AREA</p> <p>A poor diet is one of the major causes of ill-health and premature death (Food Standards Agency, 2003). Excess intake contributes to obesity, cardiovascular diseases, diabetes, cancer and dental caries. Low incomes and area deprivations are barriers to purchasing fresh and unfamiliar foods and five per cent of people on low incomes report skipping food for a whole day (Marmot, 2010). Key areas of progress include: Cardiff Food Council secured three year funding to work towards becoming a Sustainable Food City, launch of Cardiff Food Charter, all schools compliant with Appetite for Life food and nutrient standards, Dietetics community food work delivered in areas of deprivation, Healthy Options award implementation. However, only 34% of adults in Cardiff and the Vale of Glamorgan eat five portions of fruit and vegetables a day and more than half (52%) of the Cardiff and Vale of Glamorgan population is overweight or obese (Public Health Wales, 2013). The challenge is to increase the scale and reach of the work to achieve an increase in the proportion of the population eating 5-a-day and see a reduction in overweight and obesity levels. Between 2007 and 2010 low-income households cut the amount of food they buy by 11%, while food prices increased by 12% in real terms. In 2010 the poorest 10% of the population bought 25% less fruit and 15% less vegetables. Evidence suggests that when food prices go up and household incomes go down, people on low to middle incomes buy less healthy food and more unhealthy food. With respect to food safety, cases of food borne illness have remained relatively stable since 2005, though increasing in recent years. This increase is largely due to a substantial increase in the number of cases of Campylobacter infection, which has occurred in all UK countries. Food borne infections continue to present a serious risk to health.</p>	
<p>ACTIONS FOR 2014/15, 15/16 AND 16/17</p> <ul style="list-style-type: none"> • Lead the delivery and monitoring of <ul style="list-style-type: none"> • the Vale of Glamorgan Food and Physical Activity Action Plan 2014-15 • the Cardiff Food and Health Action Plan • the Cardiff Sustainable Food Action Plan to work towards Cardiff becoming a Sustainable Food City • the Cardiff and Vale Healthy Weight Framework and Over-arching Action Plan (2013-2016) • Lead the development and delivery of both the Cardiff and Vale of Glamorgan Food Law Enforcement Service Plans 2014/15 • Promote the availability of the Healthy Options Award to food businesses in C&V • Evaluate options for alternative strategies for securing improvements in the food safety performance of food businesses • Improve the food environment in local areas across the social gradient via <ul style="list-style-type: none"> • Focused activity in areas of deprivation, working with Locality and Neighbourhood/Area Management Teams • Ensuring Appetite for Life food and nutritional standards compliance in schools • Implementation of the food element of the Healthy Schools Programme and Healthy and Sustainable Preschool Scheme • Developing and delivering specific interventions across the UHB as part of the Corporate Health Standard and Healthy Options Award • Implementation of the Cardiff Sustainable Food City Programme. • Implement 'Making Every Contact Count' with staff across the wider partnership 	<p>PARTNERSHIP LINKS</p> <ul style="list-style-type: none"> • Cardiff Food Council • Cardiff Healthy Living Programme Board • Vale of Glamorgan Food and Physical Activity Steering Group • Cardiff Council and Vale of Glamorgan Council • Third sector and private sector • Cardiff Neighbourhood Management Teams <p>COMMUNICATION PLAN</p> <ul style="list-style-type: none"> • Deliver Food Cardiff Communications and Engagement Plan <p>RESOURCE RISKS</p> <ul style="list-style-type: none"> • Additional resource required to impact on population indicators of 5-a-day and overweight and obesity. • Maintain resource within Local Authority for delivery of food safety and communicable disease service response in appropriate and timely manner • Capacity for Healthy Options award delivery in the Vale of Glamorgan
<p>WHAT EVIDENCE/DATA IS NEEDED?</p> <ul style="list-style-type: none"> • Percentage of adults and children eating at least 5 portions of fruit and vegetables a day at ward or upper super output area level 	

Priority Area 9: Health Protection

<p>LOCAL PUBLIC HEALTH PLAN 2014/15-2016/17</p> <p>PRIORITY AREA: Health Protection</p> <p>LEAD OFFICERS:</p> <p>COMMUNITY LOCAL AUTHORITY</p> <p>BBV PLAN ENVIRONMENTAL PUBLIC HEALTH</p> <p>Dr Gwen Lowe (Tel: 029 2040 2478) Bethan Jones, Cardiff (Tel 029 2087 1127) Alun Billinghamurst, Vale of Glamorgan (Tel: 01446 709 707) Dr Brendan Healy (Tel: 029 2074 5422) Huw Brunt (Tel: 029 2040 2508)</p>	<p>HEADLINE PERFORMANCE INDICATORS OR TARGETS</p> <ul style="list-style-type: none"> No circulating measles in Cardiff and the Vale All declared outbreaks evaluated against WHO evaluation template at their conclusion for outbreaks and environmental incidents Meet national TB Cohort review numerical outcome targets for TB case management and contact investigation Enhanced identification of patients with chronic viral hepatitis (B and C) Increase in numbers of patients treated for chronic viral hepatitis (B and C) Increase in vaccination rates of at risk groups susceptible to hepatitis B
<p>STORY BEHIND THE PRIORITY AREA</p> <ul style="list-style-type: none"> Food borne infections continue to present a serious risk to health. The Pennington Inquiry, following the South East Wales <i>E. coli</i> 0157 outbreak, highlighted local government weaknesses in food procurement, food safety management systems and food hygiene enforcement services. Action plans are in place to deliver improvements TB remains an important cause of morbidity in Cardiff. Control depends on early detection, the completion of effective supervised treatment and the identification and screening of all close contacts. The TB Cohort review has been demonstrated to improve contact screening and TB treatment completion rates elsewhere Chronic viral hepatitis is an important cause of liver disease. Early identification and treatment can reduce the long term risk of liver disease in these patients and reduce the burden of liver disease in Wales It is estimated that 14% of the burden of disease in the UK is attributable to environmental stressors and impacts are believed to disproportionately affect the more vulnerable and deprived, therefore actions to address the most common public health impacts associated with exposures play a key role in protecting and improving health 	
<p>ACTIONS FOR 2014/15</p> <ul style="list-style-type: none"> Provide appropriate and timely responses to infectious disease notifications, identify any linked cases/outbreaks and audit/evaluate this response Publish results of national <i>Salmonella</i> case comparison study Deliver enhanced surveillance for <i>Campylobacter</i> (including thorough and timely investigation) to identify clusters of illness associated with food businesses Maintain the capacity of the TB unit to deliver screening and control activities Implement and embed TB cohort review process into TB service activity Deliver the hand hygiene action plan (hand hygiene action plan) Implement the Cardiff and Vale blood borne viral hepatitis action plan Implement action plans developed in response to the recommendation of the Pennington Inquiry into the South Wales <i>E. Coli</i> 0157 outbreak, including positioned statement on progress Deliver the Environmental Public Health work plan for 2012-15 and beyond Publish results of national project for effective management of <i>Cryptosporidium</i> in swimming pools <p>ACTIONS FOR 2015/16 AND 2016/17</p> <ul style="list-style-type: none"> Continue actions above 	<p>PARTNERSHIP LINKS</p> <ul style="list-style-type: none"> Communicable disease: Cardiff and Vale of Glamorgan Councils; NHS including GPs; Public Health Wales; third sector; private sector; local communities; offender health including Prisons, Education Environment: Public Health Wales, Health Protection Wales, Local Authorities, Natural Resources Wales, Food Standards Agency <p>COMMUNICATION PLAN</p> <ul style="list-style-type: none"> Preparation of reports for public health incidents of note Communication in outbreaks in accordance with the Communicable Disease Plan for Wales Develop and extend communication methods to actively case find communicable disease Communicate risk of chronic viral hepatitis to at risk groups and those that care for them Encourage professionals to test at risk individuals and refer positive individuals for assessment and/or treatment Develop systematic approach to disseminating infection control advice – UHB and partners Engage with communities and key partners to communicate risks around acute and chronic environmental hazard exposures Provide 6-monthly environmental public health protection activity reports
<p>WHAT EVIDENCE/DATA IS NEEDED?</p> <ul style="list-style-type: none"> Collection of data relating to management of patients with chronic viral hepatitis (most appropriately administered through a clinical management system) Develop and implement a robust environmental surveillance programme (e.g. asthma, injuries) 	<p>RESOURCE RISKS</p> <ul style="list-style-type: none"> Maintain resource in local authorities for delivery of communicable disease response in appropriate and timely manner Maintain capacity within TB unit Manage costs associated with new therapies for Hepatitis C

Appendix C – Food Standards Sampling Plan 2014-15

The Trading Standards Food Sampling Programme for 2014-15 will be made up of planned samples, samples taken in response to food incidents or alerts, samples taken of products from Cardiff manufacturers, samples taken as part of surveys funded by the Food Standards Agency and samples taken as part of combined surveys with other Local Authorities within the 'Glamorgan Group'.

The second element is sampling surveys which the Service is not committed to. This year the Service has changed its approach. After consulting with the Public Analyst (Cardiff Scientific Services) a number of proposed surveys have been placed within the Programme. This is intended to be flexible. That means not all surveys will be undertaken and the number of samples taken as part of the surveys will be adjusted to prioritise appropriately during the year. A set budget is available for this work.

Food Matrix	Analysis	Comments	Target Number	Submttd Number	cost per Sample £	total cost £	Safety or Fraud
(1) Lamb Kebabs	Meat speciation by ELISA	Multi-food & kebab shops over city	25	4	150	600	Fraud
(2) Lamb Takeaways	Meat speciation & Sauce Colourings level	Lamb in highly coloured sauce dishes	30		280		Both
(3) Raw mince and (cheap) meat products	Meat speciation incl horse DNA	beef based	20		150		Fraud
(4) Dried dates & figs	Infestation by microscope	boxed greater than 600g	40		90		Safety
(5) Ground almond powders	Peanut presence by ELISA	cash & carry/wholesalers	10		120		Both
(6) Sausages (GG Q1)	Sulphur Dioxide	Raw from butchers	20		70		Safety
(7) 'Cheese' pizza toppings (GG)	Authenticity as to whether analogue	UNCOOKED ingredient from takeaways	20		100		Fraud
(8) 'Ham' pizza toppings	Pork or poultry speciation by ELISA	UNCOOKED ingredient from takeaways	20		90		Fraud

(9) Cured ham/bacon	Nitrates/nitrite	Variety of products	20		130		Safety
(10) <u>Bottle conditioned</u> beers/ales	Alcohol content	Small brewery brands in supermarkets etc	10		70		Safety
(11) Pangasius (VR Cobbler) or Basa fish	Heavy metals (Pb/Cd/As/Hg)	fresh or frozen RAW fillets	10		140		Safety
(12) <u>Non-drainable</u> canned fruit & veg	Lead, cadmium & tin	acidic (pineapple,tomatoes) & plant/veg	50	12	150	1800	Safety
(13) Honey	Compositional laid down in Regulations	Variety of brands not tested before	10	9	200	1800	Quality
(14) Vitamin C supplements	Vitamin C levels against declared	Brands not tested before	10	9	50	450	Quality
Total			295	34		4650	

plan total	39850
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Number 5: To ascertain gross deliberate adulteration or small cross contamination of ground almond powders with peanut allergen. Known current problem as deaths have occurred in Cumbria.

In relation to numbers 7 & 8, the Food Labelling Regulations 1996 require the name of a food to be sufficiently precise so as to inform a purchaser of the true nature of the food and to enable the food to be distinguished from products with which it could be confused. Furthermore, the displayed name of a food offered for sale should not falsely describe that food, nor be likely to mislead as to the nature of that food, within the meaning of section 15 of the Food Safety Act 1990.

Number 7: To ascertain whether an advertised 'cheese and' pizza is falsely described/displayed if cheese analogue is used. Need to sample cheese topping BEFORE pizza is cooked and which has no contact with the pizza base to avoid claims of vegetable oil migrate. Known current problem.

Number 8: To ascertain whether an advertised 'ham and' pizza is falsely described/displayed if turkey ham is used instead of pork. Also have a look at the product packaging being used in order to see if for example reformed pork with added water & starch etc is being used. Known current problem. The definition of 'ham' in the Concise Oxford English Dictionary is "salted or smoked meat from the upper part of a pig's leg".

Number 10: Look for a bottle label stipulating that it contains yeast which has been added before leaving the brewery as it has been known that the alcohol can increase to exceed the tolerance prescribed by the FLR 1996 and hence may affect a driver or energy controlling dieter. Plenty of small brewery beers from the whole of Britain are sold in supermarkets.

Number 11: The 'Vietnamese River Cobbler' or 'Basa' species of Pangasius fish have been knowingly used in the deliberate act of substitution of cod but no data has been generated by CCC TS/CSS with respect to heavy metals in the raw fish originating from Vietnam water (not always perceived as being crystal swimming quality!!).

Number 12: The contents must NOT be in a liquid which the purchaser will decant and not consume. Acidic fruit including being in fruit juice are known to attack canned packaging resulting in the leaching of tin metal. In addition, the levels of soil contaminants in ethnic/exotic fruit/vegetable(s)/edible plant(s) from the earth and not in liquid (eg pureed/blended/boiled such as saag spinach) are being looked at.