



TRADING STANDARDS

Feed Service Plan 2022-2023

1. Service Aims and Objectives

Ensuring good levels of animal feed safety is an important part of Dorset Council's trading standards advisory and enforcement responsibilities.

The service is responsible for the enforcement of animal feed legislation controlling feed quality, safety, hygiene, labelling and traceability throughout the feed chain including importation, manufacturing, and primary production (feeding of farmed livestock and growing crops). These controls help ensure both the safety of the feed and food chain. Historically, the majority of our major animal disease outbreaks such as BSE and Foot and Mouth have been linked to animal feed. Likewise, major food incidents such as dioxins in pork and salmonella in pet food are directly linked to feed hygiene controls.

Business Plans

This Feed Service Plan is to be read in the context of the Trading Standards Business Plan. It is produced separately to assist elected members, consumers, businesses, staff, other enforcement bodies and external auditors to focus on the key elements of our animal feed responsibilities as well as meeting the specific needs of the Food Standards Agency (FSA) and national legislation.

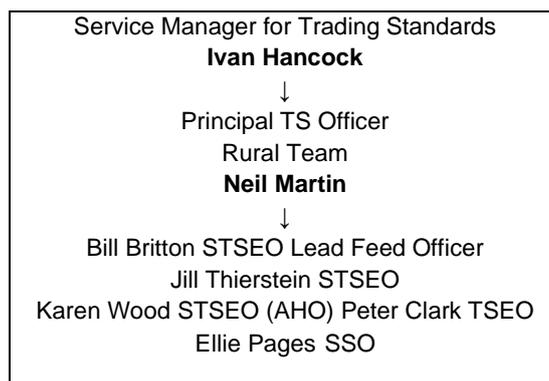
Ensuring the safety of the food chain by animal feed work contributes to the Dorset Council Plan priority of 'staying safe and well'. Activity to support local feed businesses with advice and guidance, together with the monitoring of feed supplied to farmers also reflects the Dorset Council priority of 'economic growth'.

2. Background

Profile of the Dorset Council

Located in the South West with a designated World Heritage Status coastline, Dorset is a rural county with a rich and diverse countryside that is protected by numerous areas of outstanding natural beauty. The county is largely rural with strong tourism and agricultural industries which are vital for the local economy.

Organisation Structure: feed hygiene controls



Agricultural Analysts:

Mr N Payne, with deputies Mr D Arthur, Ms L Downie, Ms M Evans, Ms D Hanks, Ms M Butts (*all at Public Analyst Scientific Services Ltd*).

3. Demands of Feed Service and Service Delivery

There are approximately 3600 business in the Dorset Council area that are registered, or require registration, under the Feed Hygiene Regulations. These are predominately agricultural holdings but also include businesses such as manufacturers that produce animal feed on a large scale for resale and animal feed importation at Portland Port. Over 250,000 tons of feed material per year is imported via Portland from all over the world. All consignments destined for Portland Port are monitored and assessed prior to arrival to establish if further checks or samples need to be taken.

All feed premises are risk assessed in accordance with the FSA feed score risk rating scheme. Visit intervals vary between annual visits for high risk and/ or low compliance to ten yearly interventions. The risk factoring for each establishment considers the size of the business, the feed operations they undertake and the risk they could potentially pose to the feed chain. However, these risks can be mitigated and the risk score for the business reduced through a system of earned recognition. This considers previous compliance history and membership of approved assurance schemes.

Covid 19

The FSA no longer recommend remote inspections. Physical inspections or sampling visits have been carried out in accordance with our Covid risk assessment. As the restrictions ease, we will continue to adhere to Covid safe working recommendations but the aim is for all inspections to be physical and not remote.

Planned Interventions

The funding is provided by the Food Standards Agency (FSA) to enable feed visits to be undertaken. The Feed delivery budget will be decreased by approx. 5% which may slightly reduce the number of inspections allocated to the service. Details of the number and type of visits predicted for this financial year can be found in the Appendix 1.

The FSA have decided to reduce the point of entry budget, however the expectation will be to continue monitoring all feed consignments with appropriate interventions such as documentary, physical and sampling checks to be carried where required. Funding will be allocated for a specific sampling project on poultry and pig feed that contain lysine or methionine. We will carry out further feed samples as shown in the Feed Sampling Plan 2022-23 (not public). Approximately half the inspections will be at non-primary production and the remaining at primary production level (farms).

Our Approach

Whenever possible feed standards are delivered by way of a single comprehensive visit alongside other trading standards service responsibilities in areas such as food, weights and measures, unfair trading and animal health and welfare.

We recognise the value and importance of our advice and will continue to treat visits as an opportunity to support local businesses with legal advice and guidance, as well as checking for compliance.

Every month we seek businesses views by way of a business satisfaction survey to ensure we continue to respond to local needs. Dorset businesses also can contact the service using our dedicated Business Advice or Animal Health lines.

Our document 'Dorset Businesses. What you can expect from your local trading standards' sets down our commitment to providing Dorset businesses with an efficient, courteous and helpful service.

Our Enforcement Policy gives a clear commitment to ensuring compliance through business advice and guidance where possible and appropriate. Prosecution is reserved for cases involving fraud, negligence, public safety risk, or failure to follow advice or warnings.

Alternative Enforcement Strategies

Feed business operators who demonstrate high standards of feed safety by taking appropriate steps to comply with the law may have these standards recognised when determining the frequency of inspections and therefore qualify for 'earned recognition'.

These cases allow for the use of alternative enforcement strategies (AES). These strategies aim to reduce the burden on previously compliant businesses while focussing enforcement activity and resources on less compliant businesses. Examples of how we can engage with business through alternative enforcement strategies include questionnaires, surveys and project-based inspections. Businesses can also earn recognition by being a compliant member of an approved industry assurance scheme such as 'Red Tractor' or being an Agricultural Industries Confederation (AIC) member.

Enforcement Priorities

The Food Standards Agency (FSA) have identified National Feed Enforcement Priorities (NEPs). At the time of writing this plan, the FSA have published Draft NEPs for the coming year.

Our service will have consideration to all the FSA priorities and how they impact on our feed delivery is shown below:

Priority 1 Verification of effective implementation and maintenance of feed safety management systems.

With the exemption of livestock farms which do not mix feeds, all registered feed business should have a feed safety management system based on the principles of HACCP (Hazard Analysis and Critical Control Points). HACCP will form an integral part of our feed and food hygiene inspections. Consideration will be given to the type and scale of the feed business in relation to what written procedures we would expect them to maintain.

Priority 2 Verification of effective implementation and maintenance of feed safety management systems at businesses supplying former foodstuffs or co-products.

We have over 80 businesses registered to supply former foodstuffs or co-products into the animal feed chain. These are mainly food retailers and manufactures. Nationally 660,000 tonnes of former foodstuffs are processed into animal feed annually at a value of £110 million. This activity can greatly reduce the amount of food waste

and provides an excellent feed for livestock however the business must have a robust feed safety management system in place to ensure that there can be no contamination with products of animal origin. Feed contaminated with products of animal origin can be a direct cause of many notifiable diseases, such as Foot and Mouth.

Priority 3 *Effective monitoring of feed on farms*

a: Examination of former foodstuffs / co-products being used for feed on farms

b: On-farm record keeping requirements & documented procedures

The service will carry out inspections on all types of farms from smallholders, with only a handful of animals, to very large-scale farming enterprises. Part of the inspection is to enquire if feed is former foodstuffs. Where a former foodstuff is found on-farm, it will be traced to ensure that the supplier is registered in accordance with the feed hygiene regulations. The impact of a notifiable disease linked to feeding contaminated feed would have a devastating effect for the agricultural industry both financially and on the emotional wellbeing of farmers.

Record checks are integral on all our farm inspections. Traceability and records such as pesticide use, pest control and medicine use all help to evidence good standards of animal welfare, environmental controls and safe feeding procedures that will help ensure the food we eat is safe.

Priority 4 *Effective monitoring of storage arrangements at feed premises*

Feed storage will also be inspected whether this is feed stored on-farm, at distributors, or with specialist bulk storage of feed materials. Possible sources of contamination must be stored away from feed and feed must be clearly separated, identifiable and stored in a clean and pest free environment.

Priority 5 *Verification of the accuracy of feed labelling particulars*

The presence and accuracy of labelling information is critical in ensuring feed is provided to the correct species and age of animal and in quantities that would not adversely affect human and/or animal health or impact on traceability. The presence of batch codes aids prompt recall and withdrawal of affected products in the event of a feed safety incident. Ongoing labelling checks will occur during our inspections as well as targeted sampling as shown in this year's sampling plan.

Priority 6 *Effective monitoring of consignments of feed originating from non-EU countries at point of entry*

We will continue to monitor all feed imports and will have a risk-based approach to checks which include document checks and sampling. With the UK having left the EU, the service will remain flexible and will ensure adequate resources are available for official controls at point of entry.

Priority 7 *Effective identification, registration and inspection of food businesses producing higher-risk, fresh produce operating at the level of primary production*

We have identified food businesses producing high-risk, fresh produce such as watercress, salads, soft fruit, which are all commonly eaten raw. These businesses are risk assessed and have been assigned an inspection interval period.

Sampling

The service will contribute to the FSA's national feed sampling project. We will also carry out risk-based sampling in specific areas such as pet foods and feed for food producing animals. The service will produce a feed sampling plan.

In addition to the sampling program, we investigate complaints about animal feed. If necessary, formal samples are submitted to the Public Analyst to establish if the complaints are justified.

Feed Incidents

Should a feed incident occur in Dorset contact would be made with the Feed Business Operator and the FSA immediately. The nature and scale of the incident would be established as soon as possible to ensure that any feed still in circulation is detained. Feed safety incidents will take priority over the routine inspection and sampling activities.

Partnership Working

We recognise the value and importance of working in genuine partnerships with others. Nationally we will continue to contribute to the strategic objectives of the FSA.

Regionally we will continue to support Trading Standards South West (TSSW) and will seek grant funding opportunities that add value to our work.

We also work with other government bodies such as Animal and Plant Health Agency, Veterinary Medicines Directorate and the Environment Agency.

Feed Promotion

Our service will maintain content on the Dorset Council website with links to guidance notes for feed businesses and consumers.

We are innovative in our feed promotion work and the service will continue to explore new methods to promote feed hygiene and guidance. Good examples of this have been livestock smallholder events educating and promoting compliance to numerous livestock keepers as well as improving the accuracy of our feed database.

Primary Authority

Currently the service has one Primary Authority Agreement with a feed business. A Primary Authority agreement would enable a business to have an enhanced relationship with our service, benefiting from a single point of contact for all trading regulation and advice. We will continue to promote this scheme.

Advice to Business

Our service operates a free at point of delivery dedicated business advice line and a separate dedicated animal health line. Businesses can obtain help and advice on feed issues ranging from registering as an animal feed premises to detailed labelling advice for manufacturers. These telephone lines can also be used to report any feed safety issues or feed complaints.

Guidance notes for businesses can be found at: <https://www.businesscompanion.info/>

4. Resources

Staff Resources and Professional Competence

The TS Rural Team has four (3.22 FTE) enforcement officers authorised as competent to undertake feed hygiene activities, of which two are fully qualified to undertake all aspects of feed enforcement, including the taking of formal samples and undertaking inspections at non-primary production. All officers involved in feed inspection work are required to complete a minimum of 10 hours professional development per year and their competency is assessed each year.

A lead feed officer has been appointed who is responsible for overseeing all feed work conducted in Dorset and to ensure that all feed activities carried out are in accordance with the FSA Feed Law Code of Practice (England). Records are retained to demonstrate the competence level of all authorised officers undertaking feed work.

Funding

The FSA provides funding for certain feed work. This is allocated to regional groups and then disseminated to individual authorities based on the number and type of premises due to be visited. The funding for inland inspections and sampling allocated to Dorset for the financial year 2022-2023 is estimated at £25,000. with additional funding for point of entry controls.

Facilities and Equipment

A stock of suitable sampling equipment is maintained to ensure that feed visits can be carried out safely and samples taken legally. All authorised officers are issued with protective equipment including steel toe capped footwear, waterproof washable clothing etc. Sampling equipment includes shovels, sampling spears in varying lengths, widths and a riffle box for dividing incremental samples. Sampling requirements are legally prescribed so that samples can be proven to be genuinely representative of the larger consignments they are taken from. A sampling method has also been developed to take samples from very large consignments of feed material from Portland Port.

Complaints and Feed Incidents

Feed complaints and incidents are monitored, and activity assessed using a regular tactical assessment process. During the last few years, the service has seen an increase in feed related complaints and we have had the resources to act accordingly.

5. Quality Assessment

All officers are subject to performance and progress review through an ongoing 'Road Map' scheme. All aspects of training needs and performance are monitored.

The lead feed officer is responsible for ensuring the quality of feed activities undertaken by the service, ensuring they comply with the Feed Law Code of Practice.

Activity, demand and progress against plans is monitored by the Trading Standards Management Team. This meets monthly to consider a regular tactical assessment document.

6. Review

Our service met all the feed hygiene controls and point of entry requirements of the 2021 - 2022 Feed Plan, including carrying out 92 funded feed inspections.

14 feed samples were taken. This number fell just short of the projected number as shown in the 2021 - 2022 feed sampling plan, but the samples were taken from a broad spectrum of our feed businesses. The service received additional funding from the FSA for contributing to a national sampling program on imported feed.

We have continued to enhance the accuracy of our database of registered feed businesses. An action plan is in place detailing improvements and progress is being monitored by the management team. Since 1 April 2017 over 1000 non-feed registered businesses have been contacted and as a result, their feed hygiene activities correctly registered on our database. This work will continue for this coming year with a target of 100 unregistered businesses to be contacted and if required, registered.

How to Contact us

Consumers requiring consumer advice or wanting to report a matter to Dorset Trading Standards should call the Citizens Advice Consumer Service on 0808 223 1133.

Businesses can telephone the Trading Standards Business Advice Line: 01305 224702.

Farm businesses, or anyone with a concern about animal health and welfare can telephone the Animal Health Helpline 01305 224475.

Email Trading Standards at: tradingstandards@dorsetcouncil.gov.uk

Trading Standards pages on the Dorset Councils' website: [Trading Standards - Dorset Council](#)

General telephone number for all Dorset Council services: 01305 221000.

Appendix 1 – Details of projected feed inspections

| Planned feed visits 2022- 2023 | Dorset |
|---|---------------|
| Inland Feed | |
| Manufacturers | 3 |
| Co-Producers | 11 |
| Mobile Mixer | 1 |
| Importers | 1 |
| Stores | 2 |
| Distributors | 10 |
| Transporters | 4 |
| On-farm mixer | 17 |
| Pet food manufacturer | 8 |
| Surplus food | 12 |
| Totals | 69 |
| Food Hygiene | |
| R13 Livestock Farm, no feed mixing | 30 |
| R14 Arable Farm | 4 |
| Food Primary Production | 6 |
| Totals | 40 |
| | |
| Grand Totals | 109 |