



Food Service Plan

2010/11

Approved by

Council on 25 November 2010

...where quality of life counts

**SUFFOLK COASTAL DISTRICT COUNCIL
FOOD SERVICE PLAN 2010/2011**

1. SERVICE AIMS AND OBJECTIVES

1.1 Aims and Objectives

1.1.1 Food Safety Service

To ensure that all food businesses comply with the relevant standards, are hygienic and have adequately trained staff.

To ensure that food in the District is fit for human consumption and that any outbreaks of food poisoning and other infectious diseases are controlled.

To secure and maintain a safe and healthy environment, for employees and members of the public, in those establishments for which the Council has an enforcement responsibility.

1.1.2 Port Health Service

To ensure the control of infectious diseases into the United Kingdom via the Port of Felixstowe.

To ensure that all vessels within the Port Health District comply with international and United Kingdom health requirements, and are maintained in a hygienic condition.

To operate the Border Inspection Post at the Port of Felixstowe as defined in the Products of Animal Origin (Third Country Imports) (England) Regulations 2006 (as amended)

To ensure the safety of products not of animal origin through enforcement of The Official Feed & Food Controls (England) Regulations 2009, the Contaminants in Food (England) Regulations 2009 and relevant EU legislation at Felixstowe.

To ensure the safety of products not of animal origin imported through Harwich International Port, Harwich Navyard and Mistley Quay in accordance with the Agreement made between Tendring District Council and Suffolk Coastal District Council.

To deliver the port health service at the Port of Ipswich in accordance with the agreement made between Ipswich Borough Council and Suffolk Coastal District Council.

To ensure the safety of high risk animal feed imported through Felixstowe in accordance with the agreement made between Suffolk County Council and Suffolk Coastal District Council.

1.2 Links to Council Objectives and Plans

During 2010/11 the Council will be developing shared services with Waveney District Council and, where appropriate, wider partnerships to ensure that a suitable standard of service is provided in the most cost efficient way.

1.3 The Council's vision, ambitions and values are set out in its ten-year Corporate Plan 2005-15 (Appendix 1) and beneath this sit a number of medium-term priorities. The current corporate priorities are:

- Feeling safe/being safe from crime
- Increased housing to meet local needs
- Improved waste management
- Coast and estuary management
- Creating stronger communities
- Developing and promoting green policies and improved environmental management in the district and
- Delivering well performing, efficient and accessible services for all.

- 1.4 The Corporate Scorecard 2010/11 (Appendix 2) comprises of a set of key objectives that define success for Suffolk Coastal. These objectives have been set under six priority themes which each make an important contribution to quality of life within the district. The Council's performance against these objectives will be published in its Annual Report in September 2010.
- 1.5 Service Level Scorecards provide strategic direction for service areas and beneath them sit the Team Scorecards that provide a clear line of sight between strategic corporate objectives and the tasks carried out by staff delivering services. The Health Service Level Scorecard, Food and Safety and Port Health Team Scorecards 2010/11 (Appendix 3) link directly to the Council's Community Well-being objective and performance against targets for 2009/10 are set out in appendix 4 (Port Health and Food and Safety Team scorecard results 2009/10).
- 1.6 Budget Plans (Appendix 5) have also been prepared for each service area matching resources to anticipated workloads.
- 1.7 Regular performance review meetings are held between Heads of Service Senior Management Team to monitor performance against targets and to assist in identifying service improvements.
- 1.8 During 2009/10 the Council carried out a review of its corporate objectives and medium term priorities and engaged with a range of stakeholders to review service priorities. The services were ranked 34th (Food and Safety) and 42nd (Port Health) out of the services assessed.

2. BACKGROUND

2.1 Profile of the Local Authority

The Council is located in the county of Suffolk and covers nearly 90,000 hectares (900 km²). The district has a population of around 124,100 (Office for National Statistic Population Estimates for mid year 2008 - published May 2010) living in mixed environments including open countryside, sparse settlements, villages, traditional market towns, the key commercial centres of Woodbridge and Felixstowe, as well as the urbanised fringes of the regional town of Ipswich. The two principal towns, Felixstowe and Woodbridge, are located in the south area of the district.

Within the district is the Port of Felixstowe, which is the largest container port in the United Kingdom. Over one-third of all food imported into the United Kingdom enters via this route. The Council is the Port Health Authority for the port with responsibility for monitoring the safety of imported foods and operating a Border Inspection Post.

The area is renowned for its largely unspoilt countryside and coastline, and has a thriving tourist trade centred on the coastal resorts of Felixstowe and Aldeburgh. The area has many sailing and boating clubs, and is popular for rambling and riding. The District is located one hour from London, and has good rail and road links with surrounding areas.

2.2 Organisational Structure

2.2.1 The Council

The Council has 55 elected members, and the Conservative Group holds the majority of seats. The Council moved to a leader and cabinet structure in December 2001 and the Cabinet Member with responsibility for food safety matters is Councillor Mrs Sherrie Green. The Council is comprised of 8 Service Areas:

- Legal and Democratic Services
- Planning Services
- Community and Economic Services
- Health
- Finance and Central Services
- Housing and Benefits
- Strategic Services and
- Audit Partnership.

Suffolk Coastal District Council works in partnership with Norfolk County Council to provide operational functions such as property maintenance, refuse collection and grounds maintenance.

Each Service Area has a Head of Service, Phil Gore being the Head of Health.

The Corporate Management Team comprises the Chief Executive, two Strategic Directors and nine Heads of Service (including a representative from SCS Ltd). The Chief Executive, Stephen Baker, has overall responsibility for the efficient management and execution of the Council's functions. See Appendix 6 for further information on the management structure.

2.2.2 Service Area for Health

The Service Area for Health is comprised of five teams:

- Food and Safety
- Port Health
- Environmental Protection
- Health Improvement and
- Emergency Planning

The Food and Safety and Port Health Teams contribute to the Council's aims through activities that include:

- food safety
- imported food controls
- food hygiene regulation and promotion
- health and safety regulation and promotion
- the monitoring and control of infectious diseases including food poisoning
- Council occupational health and safety
- Smokefree legislation and
- Joint working with other agencies in Suffolk, such as the Suffolk Primary Care Trust, to support wider health improvements identified in the Community Strategy Action Plan.

The Port Health Team is responsible for protecting the health of the community, by monitoring the standards of safety of all foodstuffs imported into the European Union and the United Kingdom at the Port of Felixstowe and for ensuring the control of hygiene and infectious disease on board vessels.

The structures of the Food and Safety and Port Health Teams are provided in Appendix 7.

The Principal EHO (Food and Safety) and three Port Health Service Managers have been appointed as Lead Officers for food hygiene and food safety matters, in accordance with the Food Safety Act Food Law Code of Practice. Letters of appointment are contained in Appendix 8.

The Microbiology Department, Ipswich Hospital and the HPA East of England, Chelmsford Food, Water and Environmental Laboratory (UKAS Testing Laboratory No. 1734) provide specialist services in food microbiology and pathology. The HPA has reviewed the provision of its services to Local Authorities and Port Health Authorities in England, its intention being to strengthen and improve the food, water and environmental areas. The new arrangements have been formalised in Service Level Agreements. The Council has appointed Lincolne Sutton & Wood Ltd., Norwich as Public Analyst to the Council and they provide specialist advice on food composition, labelling, and chemical and physical contaminants of food. The Committee minute confirming their appointment appears in Appendix 9. The appointments are in respect of Public Analyst Stephen Guffogg, and additional Public Analyst Peter Brown. Lincolne Sutton & Wood Ltd have been taken over by Eurofins Laboratories Ltd but are still trading as Lincolne Sutton & Wood so we will not need to update the Public Analysts appointments at this time. Eurofins Laboratories Ltd is an international organisation with nine laboratories in the UK and a total of 150 laboratories in 29 countries specialising in different areas. As Lincolne Sutton & Wood now have access to more specialised laboratories as part of their group we are able to send them the majority of our samples. Samples will be forwarded to the laboratory within the group with the specialism for the analysis required. Most of our antimicrobial residue samples continue to be analysed by Lincolne Sutton & Wood via the Eurofins network following a review in relation to cost and turnaround times. Port Health is now having regular meetings with Eurofins representatives and our analyst to exchange information

about forthcoming requirements and developments and to keep procedures and performance under review.

The Central Science Laboratory in York has been incorporated into The Food and Environment Research Agency (FERA). FERA analyses the routine antimicrobial residue samples submitted by the Authority. These samples form part of the Veterinary Medicines Directorate non-statutory surveillance scheme. Samples of fishmeal which are checked for the presence of mammalian bone are submitted to the Veterinary Laboratories Agency at Luddington as advised by DEFRA.

The review of the legislation covering foodstuffs at risk of contamination from aflatoxin and the introduction of the High Risk Product legislation has seen an increase in the number of non animal origin samples taken and submitted to the Public Analyst.

The emergency control legislation covering melamine contamination in milk and milk products for babies and children, other products containing milk, soya and soya products has been relaxed in view of the satisfactory results of sampling undertaken at the Point of Entry which have been submitted to the EU Commission. Such products intended for babies and young children remain banned and all other consignments require a documentary check but the level of identity and physical checks has been reduced from 100% to 20%. The relaxation of this requirement has eased the considerable pressure placed on the analytical services. Products believed to be low risk (based on ingredients and previous sampling of the same or similar products) are sent to Campden Brewing Research Institute (BRI) for melamine analysis and those perceived to be high risk are sent to Lincolne Sutton & Wood.

The Council is a member of Campden BRI and as such has access to technical support on food and safety related matters.

2.3 Scope of the Food Service

Suffolk Coastal District Council carries out all functions relating to food safety matters, including the following:

- carrying out interventions e.g. inspections and sampling at food establishments
- providing advice to food business operators including help on implementing the FSA's Safer Food, Better Business food safety management system
- inland imported food control at retail and catering establishments etc.
- registration and approval of food establishments
- food sampling
- issue of export certificates
- investigation of complaints concerning food establishments and food handling practices
- investigation of cases of suspected and confirmed food poisoning and
- a food safety education programme, including the CIEH level 2 Award in Food Safety.

In addition to its responsibility for food safety matters the Food and Safety Team is also responsible for all aspects of the enforcement of occupational health and safety, the Council's Safety Officer role, infectious disease control, smokefree legislation and is a Responsible Authority under the Licensing Act 2003. A separate Health and Safety Service Plan is published for health and safety enforcement work. The service is provided predominantly by the full and part-time members of staff in the Food and Safety Team but, when necessary, this has been supplemented by the use of private contractors offering a food establishment inspection service.

The Port Health Service has responsibility for all food safety and food standards matters relating to imported foods. The service includes the following:

- operation of Felixstowe Border Inspection Post (products of animal origin)
- imported food control (non-animal origin products) at Felixstowe Harwich International Port, Harwich Navyard and Mistley Quay.
- Imported food control, vessel inspection, & control of infectious disease at the Port of Ipswich
- inspection of vessels to ensure compliance with international and United Kingdom health requirements
- food hygiene inspections of vessels within the dock
- control of infectious disease

- verification of organic produce at point of importation and
- undertaking monitoring programmes.

Suffolk County Council is responsible for all food standards matters within the District, outside of the Port of Felixstowe and responsible for NAO animal feed arriving at the Port. Liaison arrangements exist with Suffolk County Council Trading Standards Department through the Suffolk Food Liaison Group. Port Health has developed an effective working relationship with the Trading Standards Department. We are currently negotiating a contract which will see this Authority deliver the day to day statutory requirements for feed covered by the High Risk product legislation for feed arriving at Felixstowe on behalf of Suffolk County Council. We are also continuing to work with them to ensure an effective monitoring procedure for other animal feed imported through Felixstowe.

2.4 Demands on the Food Service

2.4.1 Food Safety Service

Suffolk Coastal District Council has 1,290 food establishments approved/registered with it under food safety legislation. A profile of registered/approved food establishments classified in accordance with the FSA's main use codes is given in Appendix 10.

Within the District there are larger food businesses which manufacture and export yeast for the bakery industry, food flavourings, mill rice, and manufacture sauces and condiments. There are also 17 food establishments approved under EU Regulation 853/2004 to produce eggs, meat, dairy, fish, and shellfish products e.g. a dairy supplying pasteurised milk and cream, fish and shellfish producers, yogurt/ice cream producers and establishments producing meat/meat products.

The Council's food safety services are delivered from the main Council offices at Melton Hill, Woodbridge between the hours of 0845 - 1715 hours, Monday - Thursday, and 0845 - 1645 hours on a Friday, and from the Port Health Office at Avocet House, The Dock, Felixstowe between the hours of 0630 - 2200 hours, Monday - Thursday, 0630 - 2130 hours, Friday, and 0630 - 1430 hours Saturday, Sunday and Bank Holidays.

The services are covered by a Duty Officer on standby out of normal office hours, 24 hours a day, 365 days a year.

As a popular holiday destination the area experiences an influx of tourists during the summer months, and many of the food businesses in the seaside resort of Felixstowe are seasonal.

In late May/early June the District hosts the annual Suffolk Show, which attracts upwards of 80,000 visitors over a two-day period. Catering for the event is on a very large scale, and requires significant Food and Safety Team resources in the lead up to and during that period to ensure satisfactory hygiene standards.

The Latitude Festival takes place over 4 days in July. This is a licensed event involving live music, plays and other art and entertainment. Attendance has grown over the years and in 2010 it will have a license for 35,000 people to attend. Part of the festival site is within the Waveney District Council area. Officers will work with the event organisers, colleagues from Waveney District Council and others during the planning and delivery of the festival to fulfil the roles of a responsible authority and food safety law enforcement body.

Out of normal office hours inspections are undertaken where this is necessary e.g. some large outdoor events, Sunday markets and regular farmers' markets. Some food businesses that are open for business at night, at weekends or in the early hours of the morning are identified for occasional inspection at these times.

2.4.2 Port Health Service

Construction of the Felixstowe South project began in 2008. The expansion is of great strategic importance in the European market and the development is critical to secure additional deep water capacity for the UK market. The scheme sees the area previously used by P&O North Sea Ferries Ltd, the Dock Basin and Landguard Terminal converted into a new deep water container terminal. A third rail terminal and upgrades to the national rail network serving the Port are also included in the project. This will increase the rail capacity for the Port. The first phase is on target for vessels to be

accepted to trial the operation towards the end of this year and for it to be fully operational by 2011. The second phase is expected to follow in 2016. When the scheme is completed it will increase the capacity of the Port by 50%. The scheme will also increase Felixstowe's capacity to deal with the world's largest container ships.

The High Risk Product legislation came into force in January of this year and provides us with full cost recovery mechanisms for undertaking the checks on those products specified within the legislation. Cost recovery mechanisms were also brought into force for those products susceptible to contamination by aflatoxin. The amendment of this piece of legislation also included a review of the physical examination rates and although some of the product rates were reduced the majority of rates for those products imported through Felixstowe increased. The implementation of these two pieces of legislation has led to increasing levels of enforcement activity in the non animal origin (NAO) area of work. The requirement for the rapid introduction of some of the emergency control legislation remains a challenge for us in translating the requirements into practical measures to deal with the cargo coming through.

Port Health Authorities have taken on responsibility for enforcing the EU Communities system to prevent, deter and eliminate illegal, unreported and unregulated (IUU) fishing at the point of importation. This requires additional documentary checks on those products captured by the legislation. Although such checks are cost recoverable the checking regime has proved very detailed and ensuring effective procedures are in place to deliver the service has been time consuming and difficult.

The development of the Port Health Information Management System (IMS) commenced in July 2008. In September 2009 a new Port Health interactive live information system (PHILIS) was launched on time and on budget and in January 2010 the project development team delivered a system for agents to submit Common Entry Documents online. The new system has delivered enhanced functionality and significant efficiency savings which have been assessed by the Council's Performance Improvement Team. The system has been especially beneficial in allowing us to create effective work flow processes for the new work and freeing up staff resources to undertake the new tasks. PHILIS online is a web based system which allows agents and importers to pre-notify their consignments to us electronically. Amendments to the CED can also be made remotely. There is no additional cost to importers/agents for the use of this system. Having the IT Team on site has allowed us to provide support for agents/importers registering to use the system and entering data into the system. As this is an extension of our PHILIS system it has the added bonus of automatically entering all data submitted by agents and importers directly into our system. We had expected to have to manually enter all CED data until this regime was incorporated into TRACES. Feedback has indicated that the system has been well received by agents and importers.

Both PHILIS and PHILIS Online have attracted interest from the European Commission, the Food Standards Agency and other Port Health Authorities (PHAs) and negotiations are ongoing with a number of PHAs to licence the system for wider use within the UK Port Health community.

The second phase of the IMS project is well underway and will see the introduction of mobile working through the use of handheld devices at the examination sheds, the automatic coding of ships' manifests and self-service arrangements for agents. During phase 2 of the development the team will continue to promote PHILIS and PHILIS Online with other PHAs and will provide setup, training and support services as part of a licensing agreement.

The Council remains committed to reviewing the roles and responsibilities of its staff and allocating the tasks to those roles best placed to carry them out. A review is also to be undertaken into the way we are delivering the service in terms of the organisation's internal structures and hours of working. This is to see the options available and to ensure we are delivering the most efficient and cost effective service.

Our work with the Port of Felixstowe through the Memorandum of Agreement has continued. Our regular meetings at operational and strategic levels have allowed issues to be addressed and have been a useful forum for monitoring working methods. The roll through way of working continues to deliver reductions to the delay caused to consignments by our examinations. The regular meetings have allowed improvements and alterations to be made to the operations and the facilities quickly and with minimum disruption to the level of service provided. This forum will continue to look for improvements which can be made to the joint service and also to look to the future to ensure that we will be able to maintain service provision as the Port expands.

We have received no official notification that The Food and Veterinary Office (FVO) plan to visit us this year to audit our activities. Their 2010 inspection programme however does include visits to the UK to carry out checks on aquaculture with respect to animal health issues and general review missions but we do not believe that they visit Felixstowe in connection with these areas. The Food Standards Agency is changing the way it undertakes its audits with peer review forming the mainstay of the audit checks in the non animal origin area and the inter authority auditing exercise remains on the APHA Imported Food Work Plan. Now that the High Risk product legislation is in place we intend to discuss this issue with the Port of London in the hope of agreeing a programme of audits between the two authorities.

There is still a high level of interest from organisations national and international in visiting us to see how we carry out our work; these include visits from senior officials from other Third Country Competent Authorities.

The State Veterinary Service will continue to conduct audits on Products of Animal Origin controls on a monthly basis. Officers from Tendring District Council will be carrying out regular audits under the terms of the Agreement to provide the Imported Food Service for Harwich International Port, Harwich Navyard and Mistley Quay. Officers from Ipswich Borough Council will be carrying out regular audits under the terms of the contract to provide a port health service for the Port of Ipswich.

The work on the control of products of animal origin and products not of animal origin through Felixstowe continues to develop. Further changes are expected during 2010/11:

- The revision of Council Directive 97/78 is still being undertaken. This will feed into new Products of Animal Origin Regulations expected in draft form in September with full enactment in autumn 2011. The new regulations may present some significant changes to the checking regime and we will need to review our procedures and working methods to ensure they are in-line with the requirements of the new legislation when it is published.
- Further emergency controls are expected on farmed fishery products from Bangladesh and India. This will require us to undertake sampling with the view of checking levels of veterinary residues on 20% of imported consignments.
- We are expecting new legislation laying down specific conditions and detailed procedures for the import of plastic kitchenware originating in or consigned from People's Republic of China and Hong Kong Special Administrative Region. This will require documentary checks on all consignments and physical checks and sampling on some articles falling within the scope of the legislation. We believe this represents a considerable additional workload for us and we will be carrying out a scoping exercise to establish numbers. The Port of Felixstowe is keen for us to undertake this so they can prepare for the additional examinations which will need to be carried out.
- The revision of Commission decision 2007/275 which lists the products to be subject to controls is expected to be completed by March 2011. We are not expecting the number of products which will need to be checked to change. Draft legislation is currently out for consultation on the regime applied to composite products. It is expected that this legislation will come into force and amend 2007/275 in January 2011. New certification is being put forward for composite products.
- We are still awaiting enactment of The Poultry Marketing Regulations. These require the examination of a small amount of fresh chicken to check that the grading claimed for the product is correct. As we are already examining these consignments we are well placed to carry out this function providing the issues relating to who pays for this service can be resolved.
- We are still awaiting enactment of The Beef Labelling Regulations. These require traceability of the product back to the animal. As we are already undertaking document and identity checks on such products this could easily be incorporated into our work. The issue of who pays for this service would also need to be resolved.
- We expect to agree the terms of a contract with Suffolk County Council which will see us taking over responsibility for the statutory checks required on specified types of feed in the High Risk

Product legislation. This is currently the responsibility of the County Council's Trading Standards Department.

- The International Trade Single Window Transactions Service is being further developed; currently businesses can apply for Authorised Economic Operator status from HMRC via it. Common Agricultural Policy licence applications for imports and exports, followed by, in the same delivery framework, applications to Defra's Horticultural Marketing Inspectorate for a Conformity or processing certificate when importing fresh produce and pre-notifications to Defra's Plant Health and Seed Inspectorate are the next submissions planned. This also encompasses the Automatic Licence Verification project which aims to deliver significant cost savings to business and government by providing a link communicating inspection decisions between the systems of departments with enforcement responsibility. The second tranche of this project will see a link provided between HMRC CHIEF and the TRACES systems for live animals and products of animal origin.
- Following the submission of the draft report on Organisation Design we will review the options for the organisation and implement any changes deemed necessary.
- APHA have gained approval from members to undertake a piece of work to produce a guidance document for the risk assessment of vessels. The Food Law Code of Practice published in 2008 requires us to undertake risk assessment of vessels for food hygiene purposes to determine whether or not to inspect them. Under the current APHA scheme we are risk rating vessels in terms of requirement for food hygiene inspections. The risk rating scheme was introduced prior to the powers and duties given to Port Health Authorities under the International Health Regulations 2005. Under the IHR all international seagoing vessels receive Ship Sanitation inspections at least 6 monthly, this inspection includes a food safety element to it so it appears excessive to be undertaking separate food hygiene inspections on vessels in addition to this. The highest risk land based premises only receive 6 monthly inspections. The risk assessment framework should allow Port Health Authorities to target their inspections in line with the greatest risk and their available resources. Unfortunately the APHA risk assessment scheme has not moved forward to date. We have therefore decided to develop our own risk assessment scheme to target vessel inspections more effectively and to meet the requirements of the Food Law Code of Practice.
- Phase 2 of the Port Health IMS project is continuing. This includes the adoption of mobile working devices in our examination facilities which will allow us to enter information found at examinations directly into the system removing the need to write this up at the later date. Port Health is to be virtualised. Desktop PCs base units will be removed and applications will be run from a central server. This will bring quicker log on times, reduced power consumption and easier upgrading and central management control over upgrades. This will facilitate dual screen capability which will further enhance electronic working and document handling. Other strands remain ongoing including work on scanning and the electronic storage of information, autocoding, disaster recovery work to deliver a resilient disaster recovery strategy and continual development of the existing system based on user feedback.
- London Port Health and Liverpool Port Health have expressed an interest in using PHILIS and PHILIS online. Work will continue with these organisations with a view to agreeing a Service Provision contract which will also provide an income stream for SCDC.
- Changes to some of the Destin8 release codes so HMRC have more detailed information regarding what checks we have carried out or whether exemptions apply to consignments. This will assist in reducing our workload as we currently have to provide such information via faxes for individual consignments for some categories of product.
- We will continue to monitor any changes which affect our role as a Category 1 responder under the Civil Contingencies Act 2004.
- The FSA in its Proposed Strategy 2010 – 2015 has made Improving Food Safety one of its objectives. One strand of this is about ensuring imported food entering the UK market is safe to eat. We will continue to assess the implications this may have for us and responding to any consultation documents regarding this.

- We will continue to identify and utilise opportunities which arise this year for external funding to enhance our work. Funding for undertaking sampling of non-animal origin products remain in place but this may be reviewed now the charging for “high risk” products regime is in place.

The enactment of the cost recovery mechanisms for high risk food has eased the financial burden of the statutory controls required for these products, on the organisation. Fees are collected in advance of consignments being released from our control. The fees collected cover a cost element for the staff time involved in checks, sample analysis costs, sample delivery costs and consumables used in sampling e.g. plastic bags, seals, boxes, disposable sampling equipment

Routine monitoring and testing of products which pass through our district is also one of our responsibilities. Routinely selected samples regularly fail our checks and through the Rapid Alert System for Food and Feed (RASFF) we are able to notify other European Ports when matters of public health significance are identified. We also receive notifications regarding the significant failures of foods tested by other European Ports. The expectation of such notifications is that we will identify and test any similar consignments arriving here at Felixstowe.

The FSA make available additional funding to undertake monitoring over and above that we have funding to do ourselves. Priorities for the use of this funding are determined each year. This year we have submitted a bid for less funding than in previous years. Although the FSA funded sampling was not expected to start until the beginning of the 2010/11 financial year the application for such funding had to be submitted well in advance of this time. The timing of the submission of the application meant that we had not yet established the impact of the additional high risk samples on the Port of Felixstowe’s (PoF) capability to present the containers or the analyst’s capability to turnaround the samples in the required timescale. We therefore felt it was necessary to pitch our bid lower to ensure manageable workloads.

Emergency control legislation requiring the sampling of Chinese products containing milk, soya and other high protein ingredients for melamine contamination has been reviewed and the requirement for sampling of consignments has been relaxed. The rate of physical sampling has been reduced from 100% of consignments to 20%. The emergency control measures regarding the non-authorised genetically modified organism LL Rice 601 in rice products from USA has been repealed so checks on such products are no longer required. Emergency controls for Guar Gum from India have been tightened following concerns regarding the high levels of pentachlorophenol and dioxins being found in some batches. Such consignments now require a health certificate and an analytical certificate. 5% of such consignments are subject to statutory sampling for which cost recovery measures are in place. Crustaceans from India and Bangladesh are subject to additional measures due to concerns over the presence of veterinary residues. Additional documentation must accompany such consignments. Indonesian farmed fish have also been subjected to additional statutory sampling requirements due to concerns over veterinary residues in such products.

The testing of consignments for non-permitted colourings such as Sudan and Para-Red is now undertaken as part of the high risk product regime. There is now no requirement for any analytical test documentation to accompany consignments but they are subject to statutory sampling at a rate of 20%.

Enforcement Policy

In February 1999 the Council adopted the government’s Enforcement Concordat (Council minute – Appendix 11) and has adopted a comprehensive Enforcement Policy covering all of its regulatory services, including food safety and port health services (Appendix 12). In drafting the policy the Council have had regard to:

- The Enforcement Concordat and
- The Code of Crown Prosecutors.

A copy of the policy can be found on the Council's website and leaflets; “Our Enforcement Policy for Businesses” (Appendix 13) is provided for businesses where enforcement action is being considered.

All officers including those responsible for the enforcement of food safety law have been issued with a copy of the policy for reference when making enforcement decisions.

The government's Better Regulation Executive have recently published a national Code of Practice for Regulators – Compliance Code which provides a framework for enforcement decisions on a range of environmental health matters including food safety and these overarching principles must be taken into consideration in our regulatory interventions with businesses.

A revised Enforcement Policy is currently being considered by the Council's Enforcement Officer Working Group and this policy review will be broadened to include Waveney District Council so that regulatory staff working within the new partnership can operate within a common policy.

3. SERVICE DELIVERY

3.1 Food Establishments Inspection

The Council has responsibility for enforcing food safety legislation in 1,290 food establishments within the District. The food service aims to ensure that food in the District is fit for human consumption, and that outbreaks of food poisoning and other infectious diseases are controlled. To achieve this, inspections of food establishments and other interventions are carried out in accordance with the FSA's Food Law Code of Practice to ensure that they are hygienic, have identified and are controlling food hazards and that staff are adequately trained etc.

Specialist computer software is used to record all food premises/businesses. The software records are regularly updated and are used to administer a programme of risk based inspections and other interventions of establishments based on the FSA's Food Law Code of Practice. The procedure for handling food registrations, including the initial action to be taken where businesses should be registered but are not, is set down in ISO Procedure F686.

Food establishments are risk rated using criteria set out in the statutory FSA's Food Law Code of Practice. Establishments receive a risk rating according to:

- the nature of their business e.g. risk associated with the type of food handled, processing methods, number and vulnerability of customers and
- the standard of food safety achieved i.e. compliance with food safety law.

Hence establishments may be rated as higher risk either because of the high risk nature of their business or because of the lower standards of food safety or both. Establishments receive a risk rating ranging from A (highest risk) to E (lowest risk).

The FSA's Food Law Code of Practice sets down rating criteria that forms the basis of a risk based intervention programme. The range of available interventions includes inspections, monitoring, surveillance, verification, audit, sampling, education, advice, coaching, information and intelligence gathering. An alternative enforcement strategy involves the use of a questionnaire that is sent to appropriate lower risk category E food business establishments and returns are used to identify those that require an officer visit e.g. where there has been a significant change and/or the risk has increased. A copy of this questionnaire is shown in Appendix 14.

Inspections are undertaken following ISO Procedure F650. The date of a primary inspection may be brought forward e.g. in response to a complaint, a new food registration, material change in the business, receipt of information from the FSA, an outbreak, or seasonal business that may be closed at the time of the next date due etc. Other interventions are carried out at other times e.g. in response to customer complaints, alleged cases of food poisoning, food hazard alerts, sampling, revisits and requests for registration, licensing or advice.

Programmed food interventions 2010/11:

Total	Risk Category				
	A	B	C	D	E
Total targeted in period	20 (10 x 2)	73	266	46	61
Total interventions	20	73	266	46	61

See Visit Performance Analysis – Food, Appendix 15

Total estimated staffing resources is:

Risk Category	Interventions	Time per intervention (hours)	Total (hours)
A – C	359	6.5	2,333.5
D	46	2.5	115
E	61	2.5	152.5
Revisits	250	2.5	625
Total	716	----	3,226

The Trading Standards Department of Suffolk County Council has responsibility for food standards matters. Liaison arrangements are in place through the Suffolk Food Liaison Group to develop joint work plans and to help ensure that matters of joint interest, such as food labelling, imported food, BSE controls, Animal By-Products, avian influenza and genetically modified foods are discussed. Joint visits with Trading Standards Officers are made where appropriate. Copies of all food

registrations that are received are forwarded to the Trading Standards Department of Suffolk County Council.

3.2 Food Complaints

Officers investigate food complaints in accordance with ISO Procedure F655 and, where necessary, liaise with Primary, Originating and Home Authorities during the course of investigations. In determining an appropriate course of action, the Council will take into consideration any reports received from the Primary, Home or Originating Authorities, and the food business identified as the cause of the complaint, and will have regard to the Council's Enforcement Policy.

For 2010/11, the Council estimates that it will receive approximately 60 food complaints. A time-weighted average of 3.5 hours has been allocated for the investigation of each complaint, equating to a total demand on resource of 210 hours.

3.3 Primary Authority and Home Authority Schemes

The Council will support the Primary Authority (PA) and Home Authority (HA) Schemes and will liaise with the PA or HA of a business trading in the Suffolk Coastal District area on issues that affect the policies of a business. The Council has a Home Authority Partnership agreement with Walnut Tree Foods, a local manufacturer of fish cakes that are distributed to retailers. Where Primary Authority partnerships are registered with the Local Better Regulation Office, the Council will contact the Primary Authority before imposing sanctions on a company, including formal notices and prosecutions, to see whether the actions are contrary to appropriate advice that the Primary Authority has previously issued.

3.4 Advice to Business

The Council has determined that it will endeavour to build on its existing liaison arrangements with businesses, both to improve existing consultation arrangements, and to encourage and facilitate business growth.

The Council's strategy states that its food and safety services are aimed at supporting business and ensuring compliance with legislation. A free advice service is offered. We undertake to respond to requests for this service within 5 working days. We expect approximately 150 requests for this service per annum will be made to the Food and Safety Team. This equates to 300 hours of officer time.

The Food and Safety Team contributes to the Council's Business Bulletin. The latest editions published included articles on food safety training and the revised Industry Guide to Good Food Hygiene Practice for retailers. We will continue to publish articles during 2010/11 in the Bulletin as a means to communicate with businesses. The Council's Economic Development and Regeneration Team are a further point of contact for business advice.

In relation to imported food controls we attend meetings of the Felixstowe Port Users Association (FPUA). Through FPUA we are able to keep the members informed of changes in legislation and procedures which assists them with compliance and minimises disruption and delays for them.

We have continued to issue our Information Notes to advise importers and agents of changes in either legislation or procedures so they know what needs to be done to minimise delays to their consignments. These have been particularly beneficial in the run up to the implementation date of the High Risk Product legislation where several notes were issued as more information came to light so agents and importers were in possession of the most up to date information. The work undertaken in explaining the IUU requirements to the importers and agents were beneficial to all parties. The available information was complicated and confusing so we were able to explain the requirements in terms of import clearance which reduced delays to consignments and helped us to streamline our own procedures. Keeping our customers informed has led to greater transparency of our operations and a greater appreciation of the difficulties experienced by both sides in conducting their activities. We have continued to receive requests from importers and agents who wish to visit us to discuss how we can work together better. We have made some useful contacts through such meetings. Using the knowledge and experience our contacts have in their fields will help us put into place procedures which as well as meeting the statutory requirements of the legislation will minimise the impact of our intervention on the product and the importer.

The Port Health and Food and Safety Teams contribute updates to the Council's website pages. These have information on setting up a new business, Safer Food Better Business, commonly used forms to download, the facility to book places on training courses, make complaints or make an enquiry, access information on importing food and general food safety information.

3.5 Economic Challenge

3.5.1 The food safety and port health services are conscious of the need to help deliver conditions for business success whilst meeting our aims and objectives set out in paragraph 1.1 above. During the current economic challenge we are particularly aware of the benefits of listening to the needs of businesses and will continue to:

- provide free information and advice
- provide signposts to sources of free information
- provide local low cost training
- monitor and respond as appropriate to regular feedback from questionnaires
- contribute articles to the Business Bulletin on relevant topics for businesses
- process imported food controls promptly
- deal with applications to trade in a prompt manner e.g. food establishment approvals/skin piercing/general food establishment registrations
- respond to national influences and
- regularly review our procedures.

3.6 Food Inspection and Sampling

3.6.1 Food Safety Service

The Council carries out a programme of food sampling, supporting national food sampling programmes devised by the Food Standards Agency and LACORS, and regional sampling programmes drawn up by the Eastern Region Co-ordinating Food Sampling Liaison Group taking a risk-based approach (Appendix 16).

The Council also undertakes a local sampling programme focused on approved establishments and other major food suppliers. This includes the shellfish beds in the River Alde and Butley Creek and their associated depuration plants, a milk pasteurising unit at Walpole, meat products and yeast produced by local food business. In addition, the Council takes part in a national algal toxin-monitoring programme for shellfish co-ordinated by the CEFAS Laboratory in Weymouth.

Approximately 150 food/swabs and 250 shellfish/water samples will be submitted for examination by the Food and Safety Service during the period 2010/11. Of these, approximately 30 will be re-samples following an initial unsatisfactory result. Each sample will take a time weighted average of 1.25 hours to complete, giving a total time allocation of 500 hours.

3.6.2 Port Health Service

The Council undertakes sampling of imported products of animal origin in accordance with detailed rules laid down by the European Commission and its own risk based monitoring plan. In addition to the statutory samples of NAO required to be taken, the Council has recognised the demands of controlling imported foods of non-animal origin and undertakes a risk based sampling programme. A Food Sampling Policy helps us to determine where to focus our sampling activity. Where financial resources allow, enhanced sampling programmes are undertaken when potential problems are identified with a product or range of products.

Anticipated imported food samples:

- Microbiological - 250
- Chemical composition 2200
inc Aflatoxins and others
- Water - 20

Resource requirement 2,470 hours.

EU Emergency Control legislation imposing special conditions in relation to heavy metals (lead cadmium and mercury) on fishery products from Indonesia has been repealed in the last year however new Emergency Control provisions for Indonesian farmed fish have been enacted. These require 20% of imported consignments to be tested for specified veterinary residues. The requirements in the POAO legislation which require the next 10 consignments of a product to be sampled remain in place where either:

- residues of unauthorised substances or maximum residue limits are exceeded in a sampled product or
- products from a particular third country, part of a third country or establishment in a third country are implicated in serious or repeated infringements of laid down requirements.

remain in place. These next 10 programmes remain in place until we are advised otherwise by Defra. We have continued to operate our own sampling regime for those POAOs received at Felixstowe which have been the subject of Rapid Alerts from other Ports. This programme has been reviewed in light of the cost of sampling the next ten consignments and we are now sampling the next 5 consignments. Where an unsatisfactory result is received as part of our Rapid Alert programme the sampling of this product would automatically convert to a statutory sampling of the next 10 consignments under the POAO legislation. The number of samples we anticipate to be taken for chemical composition sampling therefore remains high. Routine sampling in all areas continues to identify products which warrant further sampling to establish if the problem found is an isolated incident or more widespread.

Enhanced sampling of NAO products deemed to be high risk but which fall outside the statutory controls is on-going and Rapid Alerts are monitored to check whether any of the products found to be unsatisfactory elsewhere are imported through Felixstowe. Now the statutory nuts and nut products sampling is supported by cost recovery mechanisms this has put the organisation in a better position to fulfil its public health role in sampling products that have been found to fail elsewhere and to undertake routine monitoring of imported foods. Information regarding non-compliant products is fed back to the Food Standards Agency for consideration so that this information can be passed onto other European Ports if this is the appropriate action.

The Emergency Control legislation requiring the testing of Chinese products containing milk, soya and ammonium bicarbonate to determine the absence of melamine has been reviewed and sampling of imported products is now only required at a 20% rate as opposed to the 100% rate we had previously. This has eased the pressure on the Port and the analyst's resources.

The documentary requirements demonstrating that consignments have been tested and are free from Sudan dyes have been repealed. Those products which may be affected with Sudan dyes now form part of the statutory controls in the High Risk Product legislation and are subject to statutory sampling at a rate of 20%. The composite nut products requiring statutory controls are now all part of the cost recovery mechanisms so this has no financial implications for the organisation. The legislation imposing statutory requirements for Chinese rice and rice products remains in place. The legislation covering Indian guar gum and guar gum products has been tightened due to continuing concerns regarding these products. We are now cost recovering the full cost of carrying out checks on these products. These provisions cover food and feed.

The on-going programme of food hygiene checks on-board vessels is continuing and whilst they are still being advised to undertake regular microbiological sampling of their water supply we have not received as many requests to undertake such sampling as anticipated. Ship Sanitation Inspections require us to check that analysis of drinking water has been undertaken and record this on the certificate issued so requests may increase as more sanitation certificates are issued. Now that the Ship Sanitation Inspection requirements have become clear it is apparent that there is considerable cross over between this and the Food Hygiene inspections. We are currently undertaking a piece of work to examine this and clarify what needs to be done to avoid duplication of effort.

All samples submitted for examination by the Food and Safety and Port Health Teams will be tested by the Health Protection Agency East of England Chelmsford Food, Water and Environmental Laboratory, and all samples or complaints submitted for analysis will be tested by Eurofins trading as Lincolne Sutton & Wood, the Council's Public Analyst, based in Norwich, or other accredited laboratories. Samples for melamine assessed as being of low risk are submitted to Campden BRI.

3.7 Control and Investigation of Outbreaks and Food Related Infectious Disease

The Council will investigate all notifications of infectious disease as detailed in the ISO Procedure F/659 Infectious Diseases.

The investigation of outbreaks of food poisoning is conducted in liaison with the Consultant in Communicable Disease Control (SCDC), part of the Health Protection Agency, and in accordance with the Suffolk Outbreak Control Plan.

The Council estimates that it will receive 250 notifications of food related infectious disease, each taking a time weighted average of 1.5 hours to complete.

Total resource required – 375 hours.

As part of the cost saving measures Port Health standby is now provided by the Central Standby services and on call EHO rather than the Port Health Officers. This removes the need for Port Health Officers to receive stand by payments. Port Health is now reviewing our Outbreak Control Plan and incorporating the changes that have been put in place for our standby arrangements. Delivery of Outbreak Control for the Port of Ipswich is also being incorporated into the plan.

3.8 Food Safety Incidents

Food Alerts will be actioned in accordance with the FSA's Food Law Code of Practice and ISO Procedure F/658. Notification of food alerts will be received through EHCNet and officers will be alerted by subscription to the FSA's SMS text message that is monitored 24 hours a day 7 days a week. Those alerts requiring immediate action will be passed directly to the Principal EHO (Food and Safety) or a senior member of staff deputising in his absence for appropriate action. A protocol exists between Trading Standards, other Suffolk local authorities and us to agree what action will be taken in response to alerts.

The Council estimates that it will receive 50 food hazard alerts a year, 5 of which will require further action such as a letter drop, telephone call or visit. A time-weighted average of 1.5 hours for the completion of action required following receipt of a food hazard alert equates to a total resource allocation of 75 hours.

The presence of veterinary residues in products of animal origin remains a major concern with respect to food safety. New Emergency Control legislation has been enacted and further provisions are expected. We continue to monitor product failures from other BIPs so we can instigate a programme of monitoring for those products which are also imported through Felixstowe.

3.9 Liaison with other Organisations

The Port Health and Food and Safety Teams have extensive liaison in place with a wide range of other organisations:

- Suffolk Food Liaison Group reporting to Suffolk Chief EHO's Group
- CIEH East of England Region
- CIEH Port Health Special Interest Group [Public Relations Officer is a member of the Port Health Team]
- FSA Imported Food Division
- FSA Contaminants Division
- FSA Animal Feed Division
- Eastern Region Sampling Group
- Association of Port Health Authorities
- CCDC and the Health Protection Agency
- DEFRA – Organic Imports Section
- DEFRA - International Trade Division
- State Veterinary Service
- Eastern Ports Liaison Network (EPLaN) [Chairman of the group is a member of the Port Health Team]
- Haven Ports Welfare Committee
- LACORS
- Medicines and Healthcare Products Regulatory Agency

- Essex and Suffolk Shellfish Liaison Group
- EETSA Agricultural Focus Group
- Liaison with HM Revenue and Customs nationally and locally in relation to imported food controls and smuggled products of animal origin
- Liaison with Planning and Building Control Teams to review related applications
- Campden BRI
- Felixstowe Port Users Association
- Harwich Port Users Association
- Port of Felixstowe
- Port of Ipswich
- Harwich International Port
- Harwich Navyard
- Mistley Quay and Forwarding
- Maritime and Coastguard Agency
- Other Enforcement Authorities on the Port of Felixstowe and
- Trading Standards/Environmental Health Departments nationally as required.

Resources: Port Health - 1000 hours, Food and Safety – 150 hours

3.10 Food and Safety Promotion

The Council has considered the benefits of improved food hygiene awareness as a part of Council's role and determined to put part of its resource into educational activities.

The Council will continue to provide a range of food hygiene training courses, seminars and workshops according to demand. This includes the CIEH Level 2 Award in Food Safety in Catering and our SFBB workshop that we developed locally to meet the needs of business. During 2010/11 we will extend the training programme with Waveney District Council to offer businesses a wider choice of dates and venues. The effectiveness of training will be assessed using delegate evaluation forms and monitoring pass rates. The fees for these courses and workshops are determined annually and are set down in the Council's Charges Schedule.

The Food and Safety Team will assist food business operators meet regulations on food hygiene through promoting and supporting the FSA's Safer Food, Better Business packs for caterers and retailers etc.

Total resource allocation 600 hours.

4. RESOURCES

4.1 Financial Allocation

Details of budgetary provision are included as Appendix 17. This does not include planned redevelopment of the Port Health IT system which has been reported to Cabinet separately.

The Council maintains its own Legal Section to provide support to service areas. There is also financial provision made to enable the use of external legal services, where appropriate.

The High Risk Product legislation was implemented in January 2010. This allows us to re-coup the full cost of undertaking the checks on a specified list of products assessed to pose a high risk to public health. This includes analytical cost, staff time and on costs. The emergency control legislation which requires statutory sampling of a specified range of nuts and nut products has also been reviewed and cost recovery mechanisms have been incorporated into this review. There was some concern that such recovery mechanisms may not be part of this legislation until some time after the high risk products. These provisions have eased the financial burden on the organisation considerably.

4.2 Staffing Allocation

4.2.1 Head of Service

The Head of Health is Phil Gore who provides a 0.45 FTE towards achieving the Food Safety Service Plan.

4.2.2 Food and Safety Team

When fully staffed the Food and Safety Team has a total of 3.25 FTE professional staff and 1.2 FTE support staff. The shortfall in the available FTE staff carrying out food safety functions caused by training commitments, and diversion of staff time to implement smokefree legislation and gaps in part-time working arrangements will be back-filled by engaging contractors etc.

4.2.3 Port Health Team

When fully staffed the Port Health Team has a total of 19.68 FTE professional staff and 24.84 FTE support staff.

Appendix 18 contains details of staff, qualifications, competence, authorisations and full time equivalents.

4.3 Staff Development Plan

The Council has introduced a scheme using a Competency Framework together with an Individual Personal Performance and Development Review (IPAD). As part of the scheme, officers formally discuss and agree an individual performance and development plan with their line manager every 12 months. Progress with the plan is reviewed every six months so any issues can be raised. Follow up sessions are offered every 3 months. After listening to feedback from staff HR have designed a new form for the IPAD process which it is hoped will make the process easier. As part of an ongoing "Working Better Together" programme in the Port Health Team monthly one to one review meetings are going to be introduced to ensure team members have sufficient feedback and contact time with their manager. Training matrices for the Food and Safety and Port Health Teams are provided in Appendix 19.

DEFRA and the Food Standards Agency have committed themselves to provide specialised training in the area of imported food. Further update seminars on products of animal origin are planned for this year. Defra and the FSA have agreed to deliver two update sessions per year and on this basis are now requiring enforcement officers to attend a session at least once every 2 years. Our Training Matrix has been amended to incorporate this new requirement. The FSA has made further provision to deliver no cost sampling training for Port Health Officers and High Risk Product courses delivered by ABC Food Safety. The EU has made further money available for training sessions for port staff which will continue to be delivered in Southampton for the remainder of this year; we secured a place on the course delivered in March 2010 and have a further place on the course being delivered in September 2010. The Port Health Team endeavours to take the full number of places which are made available to us. The Training Matrix remains in place to identify the training crucial to each role and which training has been undertaken by each individual. Relevant training areas are identified from a wide range of sources to ensure the requirements for Food Enforcement Officers in accordance with the FSA's Food Law Code of Practice are met. Training needs will need to be monitored as the number of staff who become CIEH Chartered Environmental Health Practitioners and who have to undertake additional development to maintain their status increases. The additional development required by these members of staff represents an ongoing commitment for the organisation.

A well established and extensive student EHO training programme helps to support a year out student in their third year of an Environmental Health Degree and in recent years this training has also been offered as a career development opportunity for Technical Officers and Port Health Assistants. In 2009/10 three Port Health Assistants successfully completed their degrees in Environmental Health and one has already taken up a position as a Port Health Officer within the team. The other two Assistants are preparing to submit their Experiential Learning Portfolio of work and are due to qualify and be registered as EHOs during 2010/11. We have committed to offer a similar training opportunity every two years and we will be selecting a new student shortly.

This arrangement will help meet our future need for qualified EHOs whilst providing career progression for other roles within the section. Difficulties remain in recruiting suitable Environmental Health Officers (EHOs) as Port Health Officers (PHOs) due to national shortages. Our resource issues remain under review at regular management team meetings to consider the wider picture of matters affecting our part of the organisation.

Professional staff undertake continuing professional development hours that satisfy the requirements of the CIEH and the FSA's Food Law Code of Practice.

The Food and Safety Team continues to support a Trainee Administration Assistant undertaking the Modern Apprenticeship in Business Administration at West Suffolk College.

5 QUALITY ASSESSMENT

5.1 Quality Assessment

A number of arrangements are in place to ensure the quality of the services provided by the Food and Safety, and Port Health services. These include BSI ISO 9001 and Investors in People.

5.2 BSI ISO 9001

The Council's Food and Safety, and Port Health Services are supported by a comprehensive range of written procedures, which are subject to a programme of internal audit and review (Appendix 20). A BSI audit was undertaken in March 2010 where a major non-conformity was raised in relation to the systems management procedures. The non-conformity was signed-off during a further visit in May 2010. Our next visit will be our routine visit due in September 2010.

5.3 Investors in People

The Council has Investors in People status. This is subject to external accreditation every 3 years, and its Investors in People was last confirmed in December 2008.

5.4 Inter Authority Audits

The principle of inter authority audits (IAA) is fully supported. A programme of IAA was completed some years ago by the Suffolk local authorities and consideration is being given to the way in which audits might be carried out in the future. We have a reciprocal arrangement with Waveney District Council to undertake inspection monitoring.

The Inter Authority Audit programme remains part of APHA's Imported Food Work plan. This work has not commenced as it was felt it would be inappropriate to start the programme in view of the expected major changes in non-animal origin legislation which would require a complete overhaul of procedures and practices. We hope to discuss with the Port of London the possibility of arranging inter authority audits between the two organisations.

5.5 Internal Monitoring Arrangements

Each officer within the Food and Safety Service and Port Health Service will be subject to peer review monitoring visits to ensure consistency in the team's approach to inspections (Appendix 21). The internal monitoring is supplemented by a reciprocal monitoring arrangement with Waveney District Council.

The Port Health team undertake regular monitoring of case files and staff members are subject to accompanied inspections twice a year to ensure consistency in the team's approach.

The contents of statutory notices will be discussed and agreed, where appropriate, with the appropriate manager or colleague before service.

A selection of files and correspondence will be monitored during the course of the year.

5.6 Customer Satisfaction Survey

At least a 20% sample of establishments inspected by the Food and Safety Service will be sent customer satisfaction forms, as will all complainants, vendors and manufacturers involved in food complaint investigations. The Port Health Team sends customer satisfaction surveys to importers/agents of specified non compliant consignments and to an equal number of importers/agents of compliant consignments. Once a survey has been sent to a particular agent or importer they do not receive a further survey request for a year. See Appendix 22 for copies of customer satisfaction forms. A statistical summary of the results of these surveys is shown in Appendix 23.

The information obtained is reported to a Quality Management Group with the aim of continuous service improvement (Appendix 24).

5.7 Team Meetings

The Food and Safety and Port Health Teams hold meetings to discuss all matters relating to the service, including issues relating to competency and consistency. Officers attending courses and seminars disseminate information to other team members at these meetings. The meetings are also used to review ISO procedures and as an opportunity to arrange team-training events.

5.8 Bench Marking

The Food Standards Agency now publish on their website the food safety enforcement activity carried out by all local authorities in the UK. This information is collated from statistical returns provided by local authorities (the LAEMS return) and provides a useful tool for bench marking performance with other local authorities.

The first annual report on progress on implementation of the UK's national control plan has been published. The report informs the European Commission on progress towards achieving the objectives of the plan. It summarises the results of official controls that have been undertaken and outlines the findings of audits undertaken to assess the performance of the competent authorities. The report will be used by the FVO to plan its audits of control arrangements in the UK. A third revision of the plan has subsequently been published. No substantive changes have been made to the plan. It has, however, been updated to include structure changes within organisations and legislation/guidance changes.

The Council monitors its performance against the standard set out in its Food Safety Plan via management meetings and annually to Cabinet and Council.

5.9 Council Complaint Procedure

The Council's procedure and a summary of complaints received in 2009/10 are produced in Appendix 25 together with the Council's Customer Service Standards.

6. **REVIEW**

6.1 Identification of any Variation from the Service Plan

6.1.1 Food and Safety

The Food Service Plan 2009/10 was largely completed and Suffolk Coastal District Council's Food and Safety Team continue to perform well in the delivery of a food safety inspection programme.

During 2009/10 the Food and Safety Team re-allocated officer time to attend to the prosecution of Tesco Stores Limited arising from pest activity and lack of cleaning at their Martlesham Heath establishments. The court hearings were spread over eight days in 2009 and additional officer time was taken on other days to deal with matters that were raised by the defence.

In 2009/10 the part-time post of a Technical Officer was deleted from the Food and Safety Team as part of efficiency savings

6.1.2 Port Health

Despite the continually expanding workloads the Port Health Team have managed to deliver an efficient and effective service and incorporate major changes into our procedures with minimal disruption. Although some of our improvement areas remain ongoing we did complete those tasks that we had hoped to in 2009/10.

3.1 The key achievements in 2009/10 worthy of note are:

3.1.1 Port Health and Food and Safety

- The appendices to the Food Safety Service Plan were made available to download from the Council's website via a link at the end of the Plan.
- A review of the service provision was undertaken to identify further efficiency savings as part of a wider programme of work being undertaken by the Council. Port Health standby is now provided by the central standby service and on call EHO rather than the Port Health Officers. The part-time Technical Officer post from the Food and Safety Team was deleted.
- Opportunities were explored to work more closely with Waveney District Council on Food Safety and Port Health services. Examples of closer working include:
 - delivered joint training for enforcement officers
 - developed a reciprocal inspection monitoring programme to help provide consistent and competent inspections and to share best practice and
 - share officer expertise in specialist areas e.g. dairy hygiene.
- Customer satisfaction surveys show that:
 - 77% of training course delegates rate an improvement in their knowledge as *good* or *excellent* (99% as *good*, *excellent* or *satisfactory*)
 - 89% of delegates rate training courses as *good* or *excellent* (100% as *good*, *excellent* or *satisfactory*)
 - 90% of complainants rate their overall satisfaction with the level of service provided by the Food and Safety Service as *good*, *excellent* or *satisfactory*
 - 88.24% of respondents agreed they had received a good level of service from Port Health
 - 83% - NI182 Business satisfaction with local regulatory services

6.2.1 Food and Safety

- Continued to target interventions, including providing support and guidance, to assist food businesses in achieving compliance with food safety management requirements.
- Planned and extended arrangements to improve standards at poorer performing food businesses by arranging meetings with food business operators to review their performance with them and give them an opportunity to discuss what barriers etc. they face in becoming compliant. Officers listened to food business operators and explained legal expectations, offered advice on compliance and agreed action plans with timescales. This work will continue through into 2010/11.
- Carried out inspections as follows

Category of food establishment	2009/10		2008/09	
	Inspections completed	% of inspections due carried out	<i>Inspections completed</i>	<i>% of inspections due carried out</i>
A	23	96	19	100
B	66	100	108	99
C	286	99	273	100
D	80	100	40	100
Total	455	-	440	
E	Category E low risk food establishments received self assessment questionnaires as an alternative enforcement strategy unless inspection considered appropriate on a case by case basis.			

- Report that the percentages of food establishments in the area which are broadly compliant with food hygiene law (NI184 Indicators for Local Authorities and Local Authority Partnerships) for 2009/10 has improved:

Category of food establishment under the FSA's Food Law Code of Practice.	Total number of establishments	Number of establishments broadly compliant with food hygiene law	% of food establishments which are broadly compliant with food hygiene law
A	11	3	27.27%
B	81	42	51.85%
C	502	442	88.05%
D	146	141	96.58%
E	498	498	100%
Unrated	21	To be established	To be established
All	1,259	1,126	89.44%

Notes:

The figures in this table are based on a report produced on 29 June 2010 for the period 2009/10 and are subject to verification by the FSA.

In 2008/09 the % of broadly compliant food establishments was 86.61%

The FSA have changed the way in which they calculate this figure (new unrated establishments are now excluded from the calculation) and caution is required when comparing previously reported figures.

This national indicator has now been dropped.

- Sent an information leaflet to key food business operators giving them advice on preventing and controlling outbreaks of Norovirus
- Prosecuted Tesco Stores Limited for the offences under food safety law relating to mice at Tesco Extra, Anson Road, Martlesham as detailed below:
 - Six offences of failing to ensure that the food premises kept clean between 30 April 2007 and 13 July 2007 contrary to Regulation 17(1) of the Food Hygiene (England) Regulations 2006 and Article 4(2) Annex II Chapter I Paragraph 1 of Regulation (EC) No. 852/2004.
 - One offence of failing to ensure that the construction of the same premises ensured good food hygiene between 30 April 2007 and 15 August 2007 contrary to Regulation 17(1) of the Food Hygiene (England) Regulations 2006 and Article 4(2) Annex II Chapter I Paragraph 2(c) of Regulation (EC) No. 852/2004.
 - One offence of failing to ensure that adequate procedures were in place to control pests at the premises between 30 April 2007 and 13 June 2007 contrary to Regulation 17(1) of the Food Hygiene (England) Regulations 2006 and Article 4(2) Annex II Chapter IX Paragraph 4 of Regulation (EC) No. 852/2004.
 - District Judge Cooper stated that he had taken into account the extensive efforts made by Tesco to rectify the inadequacies but that this had fallen below the expected standards. He took into consideration that Tesco did not plead guilty and that this was an event that took place a long time ago. He recognised that the Council had done a "terrific job" and that a degree of courage had been required by the officers involved. He said that the "public had every reason to be grateful to them". The fines imposed were:

The six cleanliness charges:	£2,000 per charge
Inadequate pest proofing:	£2,500
<u>Inadequate procedures:</u>	<u>£2,500</u>
Total fines:	£17,000

- The Council was awarded £57,000 in costs to cover legal fees, witness expenses and officer time etc.
- Reviewed procedures to take into account the 2008 Report findings of the Report of the Public Inquiry into the outbreak of E coli in Wales in 2005.
- Organised in conjunction with Waveney District Council and the HPA an *E coli* outbreak exercise for enforcement officers.
- Participated in the Suffolk Food Liaison Group exercise to assist consistent risk rating under the FSA Food Law Code of Practice.
- Raised awareness during 2009 Food Safety Week of food safety in the over 60 age group to support the FSA campaign.
- Delivered a food hygiene training programme that has continued with 144 candidates attending the Foundation Certificate in Food Hygiene/ Level 2 Award in Food Safety in Catering (3 candidates failed the examination).
- Organised and promoted a 1-day CIEH Level 2 Award in Cleaning in Food Premises training course but the event was postponed because there was insufficient demand from businesses at this time.
- Contributed to the Council's Business Bulletin with articles covering food hygiene training and the revised Food Industry Guide to Good Hygiene Practice for retailers.
- Acted as responsible authority under the Licensing Act 2003 for public safety.
- Received 61 complaints about food sold or offered for sale etc.
- Received reports of 251 cases of food poisoning and took action where necessary to identify the source of the infection and give advice to prevent its spread.
- Took 395 samples of food, water, surface swabs and shellfish for analysis as part of national and local sampling programmes. 52 of the food/water/surface swabs samples were unsatisfactory and were followed up. Some of these samples were swabs of surfaces taken as part of HPA/LACORS Microbiological Study of Ready-to-Eat Cooked Meats and Hygiene Practices in Butchers' Shops.
- Liaised with the FSA/CEFAS and took action, as a precautionary measure, to temporarily close a shellfish production area due to the detection of Diarrheic Shellfish Poison in a routine sample of shellfish.
- Served 36 Hygiene Improvement Notices on poorer performing food business operators in relation to breaches of food safety laws.
- Issued 397 letters/informal notices to food business operators to record breaches of food safety laws.
- Achieved necessary improvements to food vendor practices at special events such as the Latitude Festival and Suffolk Show to protect food safety.
- Members of the Food and Safety Team attended training courses to maintain officer competency and continuing professional development requirements on:
 - SFLG Food Law Code of Practice risk rating consistency exercise

- SFLG/HPA E coli outbreak exercise
- FSA's Vacuum packing and modified atmospheres online course
- FSA's Inland enforcement of imported food controls (Advanced)
- FSA's Effective Evaluation of Food Safety management Systems
- FSA's HACCP for enforcement officers
- FSA's The operation and control of on-farm pasteurisers
- FSA/LACORS East of England Regional Update
- Cleaning in food premises
- Local authority investigation skills course
- CIEH Buckinghamshire Branch: The Pennington Inquiry
- Evidence, interviewing and witness statements

3.1.2 Port Health

- Successful implementation of Commission Regulation 1152/2009 imposing special conditions governing the import of certain foodstuffs from certain countries due to contamination risk by aflatoxins and Commission Regulation 669/2009 regarding the increased level of official controls on certain feed and food of non-animal origin.
- Successful implementation of charging mechanisms to support the requirements of 1152/2009 and 669/2009 including arrangements to make payments by card over the phone or on-line. This was a facility previously not offered by this section of the organisation.
- A successful bid to the FSA to support enhanced surveillance of non-animal origin imports through Felixstowe which allowed us to undertake additional sampling activity to the tune of nearly £65,000.
- Successful implementation of the Illegal Unregulated and Unreported (IUU) fishing legislation. This requires all legally caught fish to be accompanied by documentation confirming they have been caught via legal sources. The new legislation is detailed and complex and involved a considerable amount of work by the organisation to ensure that staff, agents and importers were aware of the requirements and the practical measures needed to obtain clearance for their goods. Some consignments can have in excess of 50 certificates covering the fish caught. Some additional difficulties were encountered in ensuring the necessary clearance information was available to HMRC at the Hub.
- Incorporated procedures for the electronically submitted documentation available on TRACES and integrated into the CVED into our workflow.
- Implemented a range of new special control legislation covering:
Additional documentation requirements for Indian crustaceans demonstrating testing for nitrofurans and metabolites has been carried out and found to be satisfactory
- Successfully introduced our new IT system PHILIS (Port Health Interactive Live Information System). The switch over from our daybook system to the new system went very smoothly. Further enhancements have been made to the system including the addition of PHILIS online which allows the online submission by agents and importers of Common Entry Documents for high risk products and products susceptible to aflatoxin contamination. In addition to the benefits for agents and importers using PHILIS online it has the added bonus of directly inputting all the entered data into the PHILIS system avoiding the need for our staff to enter it manually.
- Continued review of the service and work load to ensure our activities were not adding undue burdens to importers during a time of recession and to ensure we had sufficient resources to meet additional work due to the Ports expansion programme and the requirements of new legislation. Such reviews have led to the appointment of 2 professional temporary staff to assist us with the requirements of the high risk product legislation.
- Signed a contract with Ipswich Borough Council which allows us to take full responsibility for port health functions at the Port of Ipswich.

Figures from PHILIS demonstrate the following level of activity during the 6 full months of its use during 2009/10:

- Dealt with an average of 868 faxes per week
- 8951 identity checks on products of animal origin
- 3287 physical checks on products of animal origin
- 1697 checks on High Risk NAO products
- 787 verification checks on Organic products
- 815 samples taken
- 153 unsatisfactory food consignments removed from the food chain over the full financial year
- Continued to forge closer links with Suffolk County Council Trading Standards Department. We have negotiated the terms of a contract which will see us taking the day to day responsibility for the feed products covered by the high risk product legislation. This should be signed shortly. We are also working with them to facilitate the routine monitoring of other feedstuffs imported through Felixstowe. We have delivered training to some of their staff on the systems in use at the Port to allow them to undertake more monitoring of goods coming through.
- Continued to work with the Port of Felixstowe to ensure the working arrangements at the Temperature Control Examination Facility continue to keep turnaround times to a minimum. The regular meetings have also allowed us to modify ways of working to take into account the changes to some vessel schedules and the increased level of sampling required under the new high risk legislation. The Memorandum of Agreement meetings with the Port continue to act as a forum for proposing improvements / changes to the arrangements which can then be quickly implemented.
- Hosted a number of high profile visits by officials wishing to see our operations first hand:
 - Representatives from the IT and Imported Food Sections of the FSA came to see a demonstration of PHILIS.
 - East of England Trading Standards Association (EETSA) Agriculture Focus Group took the opportunity to hold its business meeting here so they could have a tour of the Port and its facilities.
 - Representatives from the Seasoning & Spices Association visited to discuss the implications of the High Risk product legislation for their trade. They have made a subsequent visit now that the legislation has been implemented.
 - A further visit was made by representatives from the Food Standards Agency involved in imported food work to gain an understanding of the port environment and the work undertaken by this Authority.
 - Representatives of the International Meat Trade visited, they were very satisfied with the service provided.
- Members of the team have acted as experts in their fields:
 - Brenda McRory and Simon Rowell have attended organised meetings of the Major Seaports Group in Hamburg and Antwerp.
 - Simon Rowell has acted as a Tutor at the EU Commission's Best Practices in Veterinary Checks in Seaport BIPs course, part of the Better Training for Safer Food initiative.
 - Simon Rowell was invited to the USA to observe the export process applied to some US animal products which are not subject to legislative controls at the point of importation into the EU with the view of assisting in regulating the import process for these goods throughout Europe.
 - Richard Jacobs has demonstrated the capabilities of PHILIS at APHA conference and to other UK Port Health Authorities including Heathrow and Gatwick Airports
 - John Bax from our IT section has attended the first meeting of the National Information Management Systems (IMS) group

7. AREAS FOR IMPROVEMENT

3.2 In 2010/11 for both the Port Health Service and Food and Safety Service we plan to:

- Begin preparatory work with Waveney District Council to produce a joint Food Safety Service Plan.

3.3 In 2010/11 the Port Health Service plans to:

- Undertake an externally supported Organisational Design Review to examine working methods and timings to ensure we are delivering an effective and efficient service to our customers. The findings of the review will need to be evaluated in terms of any organisational changes needed. This will be done in full consultation with the staff.
- Support the Working Better Together Initiative which seeks to improve communications and relationships within the working environment through the use of staff representatives and external facilitators. This will deliver a more effective and efficient workforce.
- Work with MCP and HMRC to make modifications to Destin8 release codes which will satisfy HMRC requirements for release of consignments particularly those subject to IUU requirements.
- Support Great Yarmouth Borough Council in developing the port health service for the container terminal at Great Yarmouth.
- Develop and release Phase 2 of the IMS. This will include mobile working, virtualisation of the port health systems, dual screen capacity, document scanning and storage and autocoding facilities.
- Promote and market PHILIS and PHILIS online to other UK Authorities with Port health responsibilities.

3.4 In 2010/11 the Food and Safety Service plans to:

- Develop closer working with Waveney District Council by expanding our training programme to include a series of food safety training courses in both Waveney and Suffolk Coastal.
- Develop closer working with Waveney District Council by exploring the joint and reciprocal authorisation of existing food law enforcement officers.
- Introduce a formal recorded review procedure regarding the actions an EHO proposes following the inspection of poor performing food businesses.
- Extend the programme of meetings with poor performing business operators to review their performance, give an opportunity to discuss barriers they face, offer advice, agree action plans with timescales and take action in accordance with our Enforcement Policy.
- Identify 14 poor performing food establishments in Suffolk Coastal for the national LACORS/HPA coordinated study on Hygiene Practices & Interventions in Retail & Catering Premises. The study will gather data on hygiene standards in catering and retail premises handling raw meats and ready-to-eat products. It will also explore the impact of different interventions on microbiological safety and behavioural change, and is designed to inform the central and local government response to the *E. coli* O157 Public Inquiry (the "Pennington Inquiry").

GLOSSARY OF TERMS

APHA	-	Association of Port Health Authorities
BSE	-	Bovine Spongiform Encephalopathy
BSI	-	British Standard Institute
CCDC	-	Consultant in Communicable Disease Control
CEFAS	-	The Centre for Environment, Fisheries and Aquaculture Science
CIEH	-	Chartered Institute of Environmental Health
CED	-	Common Entry Document
CVED	-	Common Veterinary Entry Document
DEFRA	-	Department of Environment, Food and Rural Affairs
<i>E. coli</i> O157	-	<i>Escherichia coli</i> O157
EHO	-	Environmental Health Officer
EHORB/EHRB-	-	Environmental Health Officers' Registration Board/Environmental Health Registration Board
ERTS	-	Enhanced Remote Transit Sheds
FERA	-	Food and Environment Research Agency
FSA	-	Food Standards Agency
FSA 1990	-	Food Safety Act 1990
FTE	-	Full-time equivalent
FPUA	-	Felixstowe Port Users Association
FVO	-	Food and Veterinary Office (Audit Branch of the EU)
GM	-	Genetically Modified
HACCP	-	Hazard Analysis and Critical Control Points
HAP	-	Home Authority Principle
HPA	-	Health Protection Agency
HSE	-	Health and Safety Executive
HMRC	-	Her Majesty's Revenue and Customs
IMS	-	Information Management System
IAA	-	Inter-Authority Audit
IPAD	-	Individual Personal Performance and Development review
ISO	-	International Organisation for Standardisation
IUU	-	Illegal Unregulated and Unreported
LAEMS	-	Local Authority Enforcement Monitoring System
LACORS	-	Local Authority Co-ordinating body on Regulatory Services
MCA	-	Maritime and Coastguard Agency
MCP	-	Maritime Cargo Processing plc
NAO	-	Non Animal Origin product
PEHO	-	Principal Environmental Health Officer
PHA	-	Port Health Assistant
PHILIS	-	Port Health Interactive Live Information System
POAO	-	Product of Animal Origin
PCT	-	Primary Care Trust
PT	-	Phage type
RASFF	-	Rapid Alert System for Food and Feed
SFBB	-	Safer Food, Better Business
TEU	-	Twenty-foot Equivalent Units

APPENDICES

The appendices referred to in this Service Plan can be downloaded from <http://www.suffolkcoastal.gov.uk/yourbusiness/foodsafety/serviceplan/>