

METROPOLITAN BOROUGH OF WIRRAL

ENVIRONMENT AND TRANSPORTATION SELECT

27 SEPTEMBER 2004

REPORT BY THE DIRECTOR OF HOUSING & ENVIRONMENTAL PROTECTION

FOOD SERVICE PLAN 2004/2005

1.0 EXECUTIVE SUMMARY

1.1 This report presents to Members the joint Food Service Plan for the Environmental Health and Trading Standards Divisions. It is a Food Standards Agency requirement that the plan is approved by the Council.

2.0 BACKGROUND

2.1 The White Paper "The Food Standards Agency – A Force for Change" identified the Food Standards Agency as having a key role overseeing local authority enforcement activities. The Agency is proactive in setting and monitoring standards and auditing local authorities' enforcement activities in order to ensure this activity is effective and undertaken on a more consistent basis. Powers to enable the Agency to monitor and audit local authorities are contained in the Food Standards Act 1999.

2.2 Service plans are seen to be an important part of the process to ensure that national priorities and standards are addressed locally. Service plans will also:

- focus debate on key delivery issues;
- provide an essential link with financial planning;
- set objectives for the future, and identify major issues that cross service boundaries; and
- provide a means of managing performance and making performance comparisons.

3.0 FRAMEWORK AGREEMENT ON LOCAL AUTHORITY FOOD LAW ENFORCEMENT

3.1 The Food Standards Agency Framework Agreement has been developed in close partnership with the Local Authorities Co-ordinating Body for Regulatory Services (LACORS) and the Local Government Association.

The Framework Agreement consists of four elements:

- Food Law Enforcement Standard
- Service Planning Guidance
- Monitoring Scheme
- Audit Scheme

3.2 The Framework Agreement recognises the need for transparency and accountability and requires that the Food Service Plan be submitted to Members for approval.

4.0 FOOD SERVICE PLAN

4.1 Attached to the report at Appendix 1 is the Food Service Plan for the Trading Standards and Environmental Health Divisions.

4.2 The Plan reflects the differing emphasis of each Division's role in food law enforcement. The Trading Standards Division has responsibility for food and animal feeding stuff composition and labelling and Environmental Health Division has responsibility for food hygiene, food safety and health promotion.

5.0 FINANCIAL AND STAFFING IMPLICATIONS

5.1 The detailed work plans contained in the appropriate part of the Food Standards Plan will be met from within existing budgets.

6.0 LOCAL AGENDA 21 IMPLICATIONS

6.1 Effective and well planned food enforcement will have a positive effect on the quality of life of Wirral residents.

7.0 LOCAL MEMBER SUPPORT IMPLICATIONS

7.1 None.

8.0 PLANNING IMPLICATIONS

8.1 None.

9.0 EQUAL OPPORTUNITY IMPLICATIONS

9.1 The Department will be able to provide some translations of legal and technical information into languages other than English upon request.

9.2 Compositionally incorrect and unfit food and unhygienic food preparation will disproportionately impact upon those with health problems or eating disorders, the elderly or the very young.

10.0 HUMAN RIGHTS IMPLICATIONS.

10.1 Transparent and proportionate enforcement plans will ensure that traders and consumers are protected. Enforcement action will take place with regard to the Council approved enforcement policy.

11.0 BACKGROUND PAPERS

11.1 Framework Agreement on Local Authority Food Law Enforcement.

12.0 COMMUNITY SAFETY IMPLICATIONS

12.1 None

13.0 RECOMMENDATIONS

13.1 That Members approve the attached Food Service Plan.

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Food Service Plan 2004-2005

- 1 Service Aims and Objectives
- 2 Background
- 3 Service Delivery
- 4 Resources
- 5 Quality Assessment
- 6 Review

1 **SERVICE AIMS AND OBJECTIVES**

The Statutory Food Regulation function is divided between Trading Standards (Food Standards) and Environmental Health (Food Safety). The Food Service Plan details the direction, planned activity and intended achievements for the Metropolitan Borough of Wirral's Food Service for 2004/2005, based on the Framework Agreement on Local Authority Food Law Enforcement and the reviews of the 2003/2004 Food Service Plan.

Food Standards

The Trading Standards Service promotes a fair and equitable trading environment and has responsibility for food standards enforcement.

Food Safety

The Environmental Health Service aims to protect and promote the health of the people of Wirral by improving access to safe, wholesome food through the provision of advice, support and enforcement action where necessary.

1.1 **AIMS AND OBJECTIVES**

Food Standards and Food Safety

Wirral's Community Strategy

A shared vision for improving the quality of life in Wirral has been set by Wirral Local Strategic Partnership. This vision is published in the Community Strategy Document.

The Council are key members of this Partnership and provide the secretariat.

The Partnership is made up of key agencies and organisations responsible for delivering services to people and businesses in Wirral. It has representatives from across the following sectors:

- Public
- Private
- Voluntary
- Community

Wirral Local Strategic Partnership's Community Strategy is based upon seven themes that have been identified following consultation via Wirral Citizen's Panel, Area Forums, Ward Roadshows and through established networks:

- A thriving local economy
- Better opportunities for learning and leisure
- Improved health and social care

- Safer communities
- High quality homes
- Modern transport facilities

1.2 LINKS TO CORPORATE OBJECTIVES AND PLANS

The Council has nine corporate objectives, four of which are pertinent to the Food Service Plan.

- Promoting and supporting the economic regeneration of Wirral – providing advice and guidance to businesses.
- Improving the health of Wirral people – advice and inspection to ensure that wholesome, compositionally correct and adequately labelled food is provided and produced under hygienic conditions.
- Continuously improving our services – joined up working between Environmental Health Division and Trading Standards Division and regular review of activity.
- Providing educational and cultural opportunities for all – Environmental Health run basic food hygiene courses. The Trading Standards website contains advisory material.

The Housing and Environmental Protection Department will contribute to the objectives through our own Departmental Values:

- Ensure the provision of decent housing
- Protect public health
- Protect the environment
- Ensure fair trading and safeguard consumer rights
- Promote economic and social regeneration
- Make Wirral safer
- Continuously develop high quality services

2 BACKGROUND

Food Standards

“Food standards” means the legal requirements covering the quality, composition, labelling, presentation and advertising of food (and of materials in contact with food).

“Food standards inspection” means an inspection carried out in order to establish whether the legal requirements of food standards are being met.

Meeting specific food standard objectives within the Trading Standards Division is delegated to the Business Support Team.

The Food Service Plan addresses these aims and objectives by providing assistance to local businesses to ensure that they manufacture and sell food which complies with compositional standards and which is accurately described and labelled. Consumer confidence is maintained by a sampling and food standards inspection programme.

Food Safety

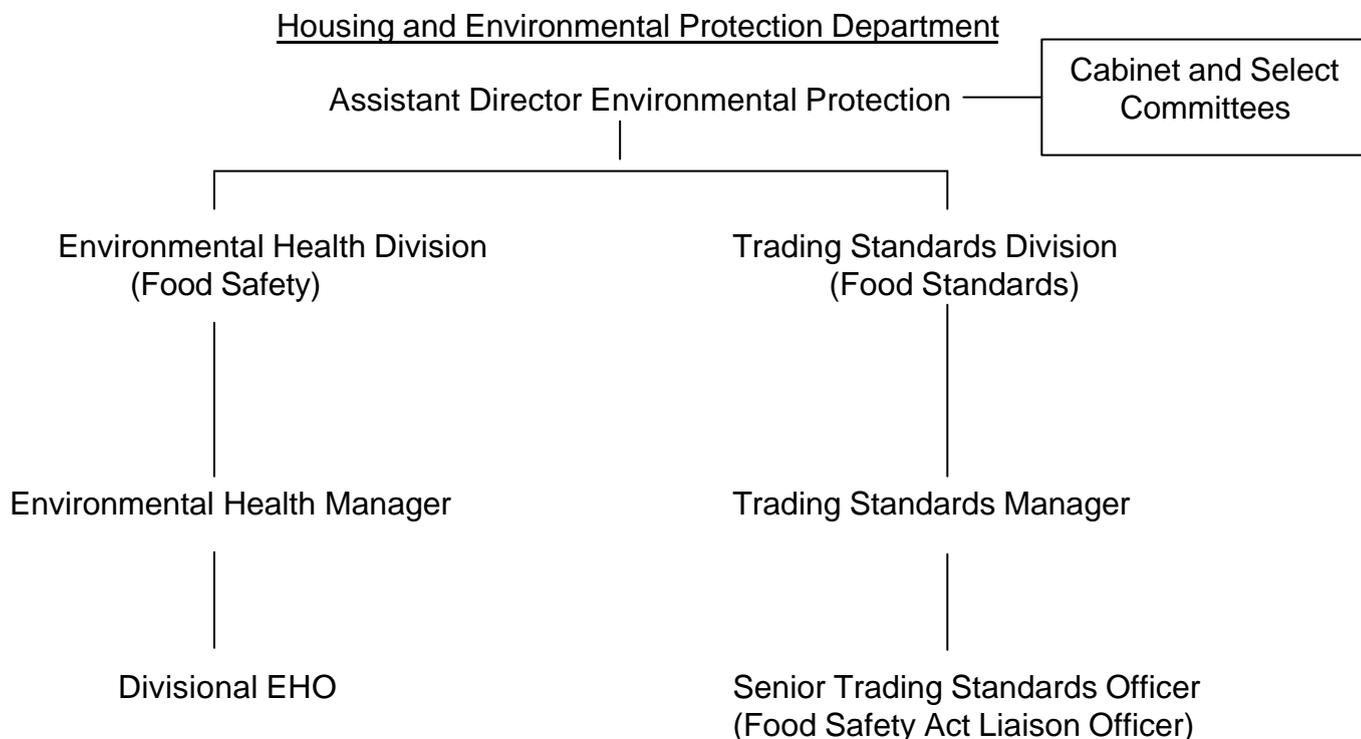
The Environmental Health Service has responsibility for food safety enforcement, and the provision of advice and support in relation to all food safety issues.

2.1 PROFILE OF THE LOCAL AUTHORITY

Food Standards and Food Safety

Wirral has a population of 310,209 people in an area of 60 square miles surrounded by the River Mersey to the east, the Irish Sea to the north and the River Dee to the west. There are 141,795 households.

2.2 ORGANISATIONAL STRUCTURE



2.3 THE SCOPE OF THE FOOD SERVICE

Food Standards

The Trading Standards Division has responsibility for Food Standards Enforcement as defined in paragraph 2 Code of Practice (No.8) on Food Standards Inspections (Revised July 1996) in relation to the legal requirements covering the quality, composition, labelling presentation and advertising of food and of materials or articles in contact with food.

In relation to the division of responsibilities under the Code of Practice (No.1) on responsibility for enforcement of the Food Safety Act 1990 the Trading Standards Division has responsibility for:

- a) Food standards inspections
- b) Sampling and analysis of food for chemical contamination, improper use of additives (taking into account hygiene or public health implications of contamination (para 11) and ensuring compliance with compositional criteria.
- c) Investigation of cases of compositional offences, adulteration and misleading claims.

Analysis and examination of samples and complaint items are conducted by the Public Analyst appointed for the purposes of Section 27 of the Food Safety Act 1990 and Section 67 of the Agriculture Act 1970, Eurofins Ltd, Hoole Lane, Chester. A draft service level agreement has been reached with the Public Analyst and will be presented to Members. Spirit screen testing and sampling, for determination of substitutes, is carried out in conjunction with manufacturers.

The Trading Standards Division is also responsible for the enforcement of a wide range of legislation relating to Weights and Measures, Safety and Fair Trading, which may apply to food premises. Where appropriate, and subject to practical considerations, the Trading Standards Division will also carry out metrology, safety or fair trading inspections alongside food standards inspections.

Food Safety

The Environmental Health District Division has responsibility for carrying out food hygiene inspections, investigating food complaints, responding to national food hazard warnings, providing food safety/hygiene information and advice, issuing food export certificates, licensing, registration or approval of premises under the appropriate legislation and for dealing with originating Authority enquiries. All of this work is undertaken in accordance with the Food Safety Act 1990 and regulations made thereunder and all relevant Codes of Practice.

2.4 DEMAND ON THE FOOD SERVICE

Food Standards

For the financial year 2004/2005 there are 30 high risk food premises, 965 medium risk food premises and 526 low risk food premises. The figures for medium risk premises has doubled due to the introduction of the new LACORS risk assessment scheme. The service is delivered from Westminster House within normal working hours 9-5. Out of hours surveys/sampling are conducted from time to time. Contact out of hours can be made via an answering machine or by e-mail.

Food Safety

In the financial year 2004/2005 there are:

Category A Premises	58
Category B Premises	287
Category C Premises	1039
Category D Premises	320
Category E Premises	577
Category F Premises	228

requiring inspection.

Each category of premises is inspected in accordance with Code of Practice No. 9. The frequency is:

Category A at least every 6 months
Category B at least every year
Category C at least every 18 months
Category D at least every 2 years
Category E at least every 3 years

Category F at least every 5 years

96.16% of category A-C were inspected and
60.92% of category D-F were inspected in 2003/2004

The majority of this service is delivered from Westminster House during normal working hours i.e. between 9-5. Arrangements will be made for evening visits to be undertaken where premises are not open during normal working hours. Contact out of hours is through the Council's emergency services telephone number.

2.5 ENFORCEMENT POLICY

Food Standards and Food Safety

At the Ratification Committee meeting held on the 9th April 2001 the local authority resolved that the adoption of the Enforcement Concordat be agreed and all regulatory services develop and maintain prosecution policies that include the principals of good enforcement contained in the Concordat. The policy incorporates the prosecution criteria of the Crown Prosecution Service and takes into account the Human Rights Act. The policy also specifically includes the Code of Practice on Legal Matters (No.2). The policy was reviewed in the light of BV166 and was agreed by Cabinet on 11 July 2002. The policy is available on TS Community Website www.tradingstandards.gov.uk/wirral or by contacting the Department.

3 SERVICE DELIVERY

3.1 INSPECTION

Food Standards

There are 30 high risk premises, 965 medium risk premises and 526 low risk premises recorded on the Masterware Windows System (MT-WIN) data base for 2004/2005. The target for food standards inspections is 100% high-risk premises, 50% of medium risk premises and 20% of low risk premises to be visited in the year. Priority is given to high risk premises. Visits to low risk premises may be means of alternative enforcement mechanisms.

Food Safety

Food premises will be risk rated and then inspected in accordance with Code of Practice No.9. In the current financial year targets of 98% inspections of A-C category premises and 75% inspections of D-F category premises were identified in the Division's Service Plan. A national shortage of EHO's and associated recruitment and staff retention problems however has meant that the targets for C-F category premises are at risk. The division will also take part in the LACORS Sampling Surveys and further sampling surveys that are agreed by LACORS and the Merseyside Chief Officers Food Sub Group.

3.2 FOOD AND FEEDING STUFFS COMPLAINTS

Food Standards

Food Standards complaints will be dealt with in accordance with paragraph 1-10 of Code of Practice (No.2) on legal matters. Examination of complaint records for 2002/2003 show a total of 71 food complaints. 84 complaints were received in 2003/2004 and a similar number anticipated in 2004/2005.

The complaints received were broken down as follows:

Microbiological	1
Chemical	4
Labelling	79

The majority of complaints relate to labelling issues, which are dealt with by visual examination and advice. A small minority relates to compositional matters. Two complaints were referred to Environmental Health.

Food Safety Act queries/complaints from personal callers are dealt with in accordance with Code of Practice No.1.

Four complaints about feeding stuffs were received in 2003/2004 and related to labelling matters.

Food Safety

All food complaints will be investigated in accordance with the relevant Codes of Practice. Examination of complaint records for 2003/2004 show a total of 160 food complaints. These include food with foreign matter and unfit food.

Any food complaints requiring analysis will be sent to the relevant laboratory in accordance with Code of Practice 7.

3.3 HOME AUTHORITY PRINCIPLE

The principle requires that local authorities should pay particular attention to goods and services originating in their area which are distributed/sold in different local authority areas. The operation of the principle also depends on communication between all parties involved.

The Home Authority Principle is a vital mechanism for liaison and co-ordination between local authorities dealing with businesses which:

- Have outlets in more than one local authority area and/or
- Distribute goods and services beyond the boundaries of one local authority area.

A **Home Authority** is the authority where the relevant decision making base of an enterprise is located. This may be the place of the head office, factory, service centre or place of importation. In decentralised businesses the role and location of the Home Authority may require discussion with other authorities taking into consideration the views of the business.

An **Originating Authority** is the authority in whose area an enterprise produces goods and services provided in or distributed to other authority areas. The Originating Authority will have special responsibility for ensuring that products or services produced, handled or provided, within its area, conform to legal requirements. Where businesses operate from a single base one authority will act as both Originating and Home Authority. Port Health Authorities are considered to be Originating Authorities for foods entering the UK from their respective ports.

The Local Authority supports the Home Authority principle as an aid to good enforcement practice as it encourages special emphasis on goods and services originating in Wirral. It supports efficient liaison between local authorities and provides a system for the resolution of problems and disputes. We provide businesses with a source of guidance and advice.

The bulk of Home Authority work is targeted at high-risk premises.

Food Standards

Wirral is Home Authority or Originating Authority for ten major food manufacturers and we receive approximately 30 home authority/originating authority referrals each year.

Food Safety

Whilst the Environmental Health Division do not act as Home Authority, they do act as Originating Authority to 10 food manufacturers. During 2003/2004 this division received 12 enquiries as Originating Authority.

3.4 ADVICE TO BUSINESS

Food Standards and Food Safety

The authority recognises that prevention is better than cure and that our role involves working positively with business, especially small and medium sized businesses, to give advice and to provide information in plain language on the rules that we apply and we will disseminate this as widely as possible. Information will be provided by means of leaflets and through the TS Community Website (address - www.tradingstandards.gov.uk/wirral) which incorporates food hazard warnings. Tailor made information relating to specific queries will be provided as and when required. It is not currently possible to identify requests for advice from food traders. Where possible this information may be provided in various ethnic minority languages. Environmental Health Division has also provided training in ethnic minority languages on food risk assessment, hazard analysis and basic food hygiene.

The Wirral Licensing Team of Merseyside Police are trained to pass on advice to new licensees as part of their induction training, raising awareness of the illegal nature of spirit substitution and adulteration.

3.5 FOOD SAMPLING AND INSPECTION

Food Standards

Sampling of Food and Feeding Stuffs forms a major part of the Food Service Plan and the sampling budget of £10,000 will be used in the following way.

We intend to participate in collaborative food sampling programmes. The advantages include the provision of a wider range of analysis results enabling the detection of particular food sector issues, potential discounts for bulk analyses and the provision of co-ordinated enforcement in the area. Where appropriate, we will take samples which have been manufactured locally.

Wirral is a member of the Greater Merseyside Food Standards Group. The Group will produce a co-ordinated sampling programme on a quarterly basis. The programme takes account of the differing local needs and budgets of member authorities.

We also intend to participate in Eurofins collaborative surveys. These surveys are organised by the Public Analyst and samples are submitted by local authorities nationally. In addition to participating in those surveys of most relevance locally we can also express a preference as to which topics will form the basis of Eurofins surveys.

Samples of food produced locally will also be taken from premises as part of food standards inspections. Officers will also take other food samples where appropriate. For example, during the course of inspections.

Results of Food Sampling Plan for 2003/2004

A total of 135 food samples were taken throughout the year for compliance with compositional and labelling requirements. The Division took part with other local authorities in food sampling surveys co-ordinated by Eurofins Public Analysts in addition to surveys of locally produced food and samples of foods about which complaints had been made.

Summaries of the results of the large scale surveys undertaken with other local authorities and co-ordinated by Eurofins are detailed below:-

Spirits Survey - Samples of spirits were taken to check for dilution with water, substitution with cheaper brands and for methanol contamination. 158 samples were submitted from 25 local authorities. The results were as follows:

RESULTS

Added Water - 4 samples of authentic spirits were watered to a significant extent (more than 2%). This corresponds to just over 3% of the samples. The levels of added water corresponded to typically between two and three double measures in a 1 litre bottle. 27 counterfeit samples all contained added water. With the exception of one which was a non-alcoholic liquid, the level of added water ranged between 4% and 13%. No incorrect samples were found on Wirral.

Brand Substitution - This mainly affected vodka with 10 out of 32 samples not being the declared brand. Half the Smirnoff samples were not the declared brand, but this figure may not represent the true figure since local authorities often pre-screen such samples and submit only those failing the screening test. Brand substitution of vodka is likely to be more successful as vodka has little characteristic flavour and is often mixed with other more strongly flavoured drinks.

Bacardi and Gordons gin were also affected (3 out of 33 samples) but no whisky nor brandy was found substituted in this survey. No incorrect samples were found on Wirral.

Methanol Contamination - No authentic spirits were found to contain methanol above the level permitted by the Spirit Drinks Directive.

3 samples of counterfeit whisky were found to contain dangerous levels of methanol. None of these were taken on Wirral. No incorrect samples were found on Wirral.

Acrylamide Survey - Samples of carbohydrate food cooked at high temperature (eg potato crisps) were taken to measure the quantity of acrylamide (a suspected carcinogen) present. 80 samples were submitted by 15 local authorities. It was found that the levels of acrylamide vary wildly even within the same food type indicating that differences in food processing conditions are capable of influencing the final level. Since the survey was completed, optimum conditions for processing potato products found to reduce acrylamide levels by a factor of five to ten have been published.

Heavy Metals in Organic Produce - Organic food is produced using different cultivation methods and fertilising techniques. Much is imported. Both these factors might affect the levels of heavy metals incorporated into the food. Samples were taken to monitor the levels of the principal toxic heavy metals – lead, cadmium, mercury and arsenic and to compare the results with statutory limits and with previous surveys on conventional produce. 103 samples were taken by 13 local authorities. The levels of heavy metals were found to be generally very low.

Growth Hormones in Beef - The European Union banned the use of specified growth hormones, including trenbolone acetate in cattle farming in 1988. Risk assessments carried out at the instigation of the World Trade Organisation led to the ban being upheld in 2002. The use of such hormones is permitted in some countries such as the US and Canada. For example, Trenbolone is often used in conjunction with 17 β -oestradiol, which was judged to be a carcinogen.

64 samples were submitted from 11 local authorities. No sample contained any detectable trenbolone acetate.

Labelling of Sausages Survey - Directive 2001/101/EC introduced a new definition of meat for the purposes of compositional standards and quantitative ingredients declarations, including upper limits on the levels of connective tissue and fat. New compositional standards for sausages were introduced by the Meat Products Regulations 2003 based on the new definition. The Food Labelling Regulations were amended to require quantitative declaration of meat ingredients from July 2003.

The aims of the survey were to monitor compliance with the new QUID requirements and to determine current levels of meat, excess fat and excess connective tissue, based on the new definition, with a view to monitoring any changes as a result of the new legislation in following years.

RESULTS

Pork sausages - 2 (3.6%) failed the new compositional standard. One of these would have passed the old regulations if all fat and connective included.

26 (47.2%) were not labelled correctly

42 (76.4%) would have passed the old 65% standard using new meat definition

Other sausages - All complied with the new compositional standard.

4 (33%) were not labelled correctly

All would have passed the old 50% standard using the new meat definition

Sudan 1 in Chilli Products Survey:- Sudan 1 was detected in cayenne pepper imported from India by French authorities in June 2003. It was subsequently found in chilli products by several agencies

Sudan 1 is a non-permitted oil-soluble artificial dye which is a suspected cancer risk.

The aims of the survey were to investigate the extent of Sudan 1 contamination of chilli products on retail sale in the UK and to investigate the possible contamination of other similar red/orange spice products. 107 samples were submitted from 10 local authorities.

RESULTS

Chilli - One sample (3.1%) contained in excess of 300 mg/kg. Contaminated sample was of Indian Origin.

Paprika - No Sudan I was found in 11 samples

Seasoning Products - 5 samples (11.4%) contained Sudan I. Levels ranged from 3 to 194 mg/kg. Which ingredient was the source of contamination and its origin was not established.

Hot Sauces - 3 samples (15%) contained Sudan I. Levels ranged from 5 to 72 mg/kg. Which ingredient was the source of contamination and its origin not established.

None of the contaminated products were found in Wirral.

HOME AUTHORITY/ORIGINATING AUTHORITY SAMPLES

Up to thirty informal samples to be taken during Food Standards Inspections to home authority or originating authority premises between April 2004 and March 2005.

The Trading Standards Division will also take part in national sampling surveys where possible.

The sampling plan has been prepared in conjunction with the Public Analyst, who is a member of the Greater Merseyside Quality Standards Group.

Food Safety

To monitor the safety of food within Wirral the Environmental Health District Division carries out a sampling programme in accordance with Code of Practice 7. This programme includes:

- Samples for each LACORS sampling study
- Any sampling programme agreed at the Food Liaison Group: Merseyside Food Sub-group. This will be co-ordinated with the Cheshire Food Sub-group.
- Samples taken which may be requested by officers for legal proceedings
- Samples in relation to food complaints
- Random/repeat samples

Food is analysed either by Food and Environmental Microbiology Services North West Regional Partnership, Chester (formerly the Public Health Laboratory Service) or Eurofins.

Sampling is generally undertaken 1 day per week by designated officer and accounts for approximately 5-6 hours per week.

RESULTS OF FOOD SAMPLING PLAN FOR 2003/2004

The results of sampling from 1 April 2003/31 March 2004 are summarised below:

- a) On 29 September 2003 a microbiological examination of ready to eat rotisserie cooked meat from retail premises was undertaken as part of a Cheshire & Merseyside Food Liaison Group Study.

The purpose of the survey was to determine the microbiological quality of ready to eat meat cooked by the rotisserie method from a range of retail premises.

4 samples were taken, 1 of which proved on examination to be unsatisfactory. An advisory visit was made to the retailer and re-sampling proved satisfactory.

- b) On 27 October 2003 samples of modified atmosphere packaged (MAP) and vacuum packed cooked ready to eat meats at end of shelf life from retail premises was undertaken as part of a LACORS/Health Protection Agency Co-ordinated Food Liaison Group Study.

The aims and objectives of the study were to determine the microbiological quality of MAP cooked ready to eat meats on sale in the U.K. at the end of their shelf life and to identify any links between microbiological quality and the type of packaging and display conditions.

4 samples were taken in this study all of which proved satisfactory.

- c) On 17 November 2003 a microbiological examination of cooked crustaceans and molluscan shellfish from retail premises was undertaken. This study was at the instigation of the European Commission Co-ordinated Programme for the Official Control of Foodstuffs for 2003 and was co-ordinated by LACORS/ Health Protection Agency on behalf of the Food Standards Agency.

The aims and objectives of the study were to participate in the E.C.C.F.C.P. 2003 to utilise the information in support of the Commission Decision 93/51/EEC.

1 sample was taken which proved satisfactory.

- d) As a supplement to the general food samples, 54 samples of cockles and mussels were taken in order to classify the shellfish harvesting ground within the River Dee. Further samples were taken of shellfish flesh to test for algal toxins. Samples are sent to The Centre for Environment, Fisheries and Aquaculture Science(CEFAS) for analysis and results are reported by CEFAS to the FSA.
- e) On 16 February 2004 a microbiological examination of take away curry meals was undertaken as part of a Cheshire and Merseyside Food Sub-Group Study.

The aims and objectives of the study were to determine the microbiological quality of curry meals from take away catering establishments.

In this study 3 samples were taken all of which proved satisfactory upon examination.

- f) In addition to the official sampling survey a further 158 samples were taken of which 25 were found to be unsatisfactory. Corrective action specified during follow up visits by Environmental Health Officers was proved to be effective as repeat samples were shown to be satisfactory. As part of the initiative the sampling officer also revisited premises that had provided unsatisfactory results in the past.
- g) A programme of environmental hygiene random surface swabbing was undertaken on 15 December 2003 to determine the presence of Salmonella and Esherichia Coli together with the examination of cleaning cloths. Of 12 samples taken 1 cleaning cloth was found to contain Salmonella enteritidis phage type 4. That premises was then further inspected by Environmental Health Officers and subsequent samples found to be satisfactory.

FOOD SAMPLING PLAN FOR 2004/2005

The Division will participate in LACORS/HPA initiated and co-ordinated studies. This will comprise the following:

Microbiological Examination of Butter

Cases of *Listeria monocytogenes* associated with butter have been reported in the Yorkshire and Humberside area and there has been a recent outbreak in Finland linked to butter consumption. There is a scarcity of information on prevalence of *Listeria monocytogenes* in butter. Opened and unopened packs will be sampled from retail and catering premises to assess the bacteriological quality of butter particularly in relation to *Listeria monocytogenes*.

Schedule: May/June 2004

Monitoring Study of Pathogens in Raw Meat and Poultry

This is a continuation of surveillance studies undertaken in 2003-04. The aim of this study is to determine the incidence of *Salmonella* spp and *Campylobacter* spp in raw meat from a variety of premises.

Between May to October, sampling will concentrate on fresh refrigerated poultry meat so results can be collated and submitted to the EU to fulfil their request.

Schedule : April 2004 – March 2004 (all raw meats)
May 2004 – October 2004 (raw poultry)

Joint Merseyside and Cheshire Food Group Sampling

In co-ordination with the Public Health Laboratory at Chester and The Cheshire Chief Officers Food Group the Merseyside group will undertake the following studies:

Dishcloths and Swabs

In response to a high incidence of *salmonella* infectious disease notifications in Wirral last year Wirral MBC undertook a study of dishcloths from Chinese takeaways, which isolated *Salmonella* spp.

Dishcloths and swabs will be taken from three takeaways by each authority. Samples will be examined for hygiene indicators, *Salmonella* spp and *Campylobacter* spp.

Schedule: June – September 2004

Microbiological Quality of High Risk Foods – Made from Raw Eggs or Pate

This study will be undertaken as required by authorities during routine enforcement activities. Sampling will be organised individually between Chester Microbiological Services and local authorities throughout the year.

Schedule: Ongoing as required.

European Union Studies – Co-ordinated by LACORS/HPA

Bacteriological and Toxicological Study of Dried Spices

Dried spices have been reported to be the primary source of foodborne outbreaks and contamination with certain strains of moulds can result in production of toxins such as aflatoxins. Samples will be taken from a variety of outlets where possible, for example, production, packing and wholesalers and establishments preparing food and from retailers.

Microbiological examination will be undertaken by Chester Microbiological Services, however, analysis for aflatoxins is beyond the normal remit of the Sub Group studies and will involve public analyst costs. We will consult the Merseyside Chief Officers Trading Standards Group for a possible joint sampling programme.

Schedule: July – December

Cheeses Made from Raw or Thermised Milk

Contaminated cheeses made from raw or thermised milk have been responsible for outbreaks of food poisoning in the European community from bacteria such as *Salmonella*, *Listeria monocytogenes*, verotoxigenic *Echerichia coli* and Staphylococcal enterotoxins.

Samples of fresh, soft and semi-hard cheeses made from raw or thermised milk will be taken, from production, where possible and retail level.

Schedule: September – October 2004

Imported Food

The Food Standards Agency is leading the Step Change initiative that aims to improve co-ordination and delivery of local authority enforcement, seaport and airports of imported foods. As part of the Step Change the FSA has provided training events this year and they have highlighted a need for procedures. During 2004/2005 Wirral will draft model procedures for investigating and taking enforcement action in relation to Imported Foods.

Model Authorisation procedures were developed during 2003/2004. Recent Food Standard Agency Training has highlighted the need for enforcement officers to be authorised in the relevant Imported Foods legislation. The model procedures will be updated to include imported foods.

3.6 OUTBREAK CONTROL AND INFECTIOUS DISEASE CONTROL

The Environmental Health (District) Division in liaison with the Consultant in Communicable Disease works to investigate and control outbreaks of food-borne illnesses. Confirmed cases of food poisoning are contacted by the District Environmental Health staff and information is sought regarding the possible source of infection. An officer from this division acts as infectious disease co-ordinator for the Authority. The time spent by officers and clerical staff undertaking infectious disease control is approximately 7½ hours per week.

During 2003/2004 there were:

- 130 notified cases of Salmonella
- 202 notified cases of Campylobacter
- 2 notified cases of Giardia lamblia
- 47 notified cases of cryptosporidiosis
- 0 notified cases of paratyphoid fever
- 5 notified cases of E Coli 0157

and 8 outbreaks due to small round structured viruses.

3.7 FOOD HAZARD WARNINGS

Food Standards

The Trading Standards Service has access to the LACORS website on a daily basis and checks food hazard warnings. Food specialist or, in his absence, the Principal Trading Standards Officer decides on appropriate course of action, based on risk. This might include advising food businesses by letter of a particular hazard and/or by means of press releases for the information of food businesses and the general public. An example of this approach was a series of visits (25 in total) were made to Indian restaurants and takeaways to advise traders of potential hazards in Sudan I dye.

Food Safety

The Environmental Health Service responds to the Food Standards Agency's Food Hazard Warning System in accordance with The Food Safety Act 1990. Food Hazard Warnings are currently issued under four categories:

- A. For immediate action
- B. For action
- C. For action as deemed necessary
- D. For information

All officers are aware of the hazard warning system and electronic mail messages are retrieved on a twice-daily basis by a nominated officer. These are then passed to the manager or deputy who will ensure that the appropriate action is taken (each Officer

also receives a copy of the e-mail on their personal computers). A hard copy is maintained of all hazard warnings outlining the action which was taken.

During 2003/2004 there were:

0 Category 'A' warnings
16 Category 'B' warnings
50 Category 'C' warnings
47 Category 'D' warnings

3.8 LIAISON WITH OTHER ORGANISATIONS

Food Standards

We subscribe to Home Authority Principle and act upon and refer appropriate queries. The Trading Standards Division is represented on LACORS North West Quality Focus Group. Instances of alcohol substitution or adulteration are brought to the attention of the police licensing section. The sampling plan is discussed with the public analyst prior to adoption and a public response is welcomed via the website.

Food Safety

To ensure consistency in enforcement and approach in all food safety matters, the Environmental Health Division has a number of formal and informal liaison arrangements with other local authorities, Government bodies, voluntary organisations and local liaison groups. These include LACORS Chief Officers Food Sub Group, CIEH Branch Meetings, CCDC and Health Authority and various other departments of the Authority.

3.9 FOOD SAFETY PROMOTION

Food Standards

A summary of the Member approved Food Service Plan will be published on the Trading Standards internet site together with a request for comments and suggestions from consumers and traders alike on the food sampling programme.

Leaflets for consumers and businesses are available on the Internet site and guidance leaflets for targeted businesses will be delivered at the time of inspection. A series of short articles will be published in Wirral Now.

There is no specific budgetary allocation for Food Safety promotion.

Food Safety

Environmental Health ran 9 Basic Food Hygiene courses participated in Food Safety Week by providing promotional displays across the Borough. Environmental Health staff also carried out a promotion on food hygiene and food safety at a local factory.

In 2004/05 the Division will be participating in the Food Safety Week.

4.0 RESOURCES

4.1 FINANCIAL ALLOCATION

Food Standards

• FTE STSO 1.3	=	£42,250
• FTE PTSO 0.1	=	£ 4,000
• Travel and Sub	=	£ 2,500
• Equipment & IT	=	£ 5,000
• Sampling	=	£10,000
• Legal Advice	=	No specific budgetary provision for prosecuting

food matters. Advocacy/advice provided by Borough Solicitors through Central Establishment charge.

Food Safety

• Staffing	=	£278,580 + o/c
• Travel and Sub	=	£ 20,000
• Equipment	=	£ 8,000
• Sampling	=	£ 1,600
• Legal Advice	=	No specific budget provision for prosecuting food matters. Advocacy and advice provided by Borough Solicitors through Central Establishment charge.

4.2 STAFFING ALLOCATION

Food Standards

Four TSO's currently meet qualification criteria laid down in Code of Practice 19. One TSO will train up to required standard in 2004/2005. Five TSO's have attended and passed 5 day Quality Assurance Lead Assessor Course. Full Time Equivalent on food and feeding stuffs 1.3 (estimate) with 0.1 of Trading Standards Manager time spent on management.

Food Safety

A planned restructure of the Division will see a number of officers dedicated to a specialised Food Safety section.

This will allow for the following full time equivalent working on food safety matters:

• Divisional EHOs	1
• Environmental Health Officers	8
• Senior Technical Officers	1
• Technical Officers	1
• Admin Support	0.2 (Post funded Centrally)

Only Divisional/Senior/Environmental Health Officers and Senior Technical Officers are authorised to carry out food hygiene/safety inspections. The officers must be appropriately qualified as described in Code of Practice 19, competent to carry out the inspection especially in respect of HACCP and be able to demonstrate their competencies.

4.3 STAFF DEVELOPMENT PLAN

Training requirements are discussed during the annual key issues exchanges conducted between January to March and a training plan prepared. Ad hoc decisions will also be made during the course of the year to respond to the introduction of new techniques or legislation.

Food Standards

The level of training required by the Code of Practice 19 will be maintained by attending courses organised by TSI Ltd and up-date courses run by the Public Analyst.

Food Safety

Environmental Health Officers will receive a minimum of 10 hours training on food safety related issues as required in Code of Practice 19. Staff have monthly team meetings when any current food safety regulations issues will be raised and discussed. All members of staff undergo a key issues exchange once a year where staff development and training requirements are identified and then acted upon. Training is met through a combination of in-house training and external training providers.

5 **QUALITY ASSESSMENT**

5.1 **QUALITY ASSESSMENT**

Food Standards

Food Sampling and programmed food standards inspections are delegated to the Business Support Team. Progress is monitored against service plan.

Food Safety

All aspects of Food Safety including sampling and inspection will be audited against the Food Service Plan. Progress reports are carried out regarding food hygiene inspections and food complaints on a monthly basis and staff will be informed of their progress during monthly team meetings.

6 **REVIEW**

6.1 **REVIEW AGAINST THE SERVICE PLAN**

Food Standards

Performance data, including food standards inspections made, samples taken and project results are collated quarterly and are published in the Department Performance Indicators Report, which is subject to review by the Departmental Management Team.

A formal review is conducted by the Trading Standards Manager and Food Specialist in September and April and variations in performance will be addressed and improvements included in next year's Food Service Plan.

Food Safety

Performance data, including the number of food safety inspections, are allotted on a monthly, quarterly and annual basis. Regular reports on performance indicators are provided for DMT scrutiny. The Divisional EHOs monitor performance monthly and discuss any variances with the Environmental Health Manager on a quarterly basis. Any corrective action necessary is implemented as soon as practicable.

6.2 **IDENTIFICATION OF ANY VARIATION FROM THE SERVICE PLAN**

Food Standards

a) For 2003/2004 the target for programmed inspections were:

High risk – 15
Medium risk – 222

Visits concluded:

High risk – 14
Medium risk – 171

The apparent shortfall arose as 54 premises had been visited for the purposes of a programmed inspection but had ceased trading. In these circumstances no visit can be recorded. The Food Standards Agency is reviewing its methods of data collection.

b) The self-assessment questionnaire due to be sent to a proportion of low risk traders was held over to 2004/2005 to enable the enhanced mail merge facilities of the new MT/WIN system to be used.

Food Safety

The food safety plan will be reviewed annually by the Environmental Health Manager and Divisional Environmental Health Officers.

6.3 AREAS OF IMPROVEMENT

Food Standards

- a) A Service Level Agreement agreed in principal with Public Analyst, Eurofins Ltd. Authorisation will be sought from elected members to approve the agreement.
- b) A series of articles concerning food standards to be published, in conjunction with Public Relations in Wirral Now, eg. minimum durability, allergens, food hazards, nutritional labelling, spirit adulteration, compositional standards, meat labelling, genetically modified foods.
- c) The Greater Merseyside Food Standards Group consisting of representatives of Wirral, Cheshire, Warrington, Halton, Knowsley, Sefton, St Helens, Liverpool and Public Analysts meets on a regular basis and will arrange co-ordinated sampling projects included in a detailed business plan.

Food Safety

- a) Inter Authority Audit to be carried out with other Merseyside Authorities to ensure consistency of procedures.
- b) In accordance with LACROS and Food Standards Agency guidance, investigate alternative strategies for food safety enforcement in D, E and F rated premises.
- c) Ensure written food safety procedures are updated and in house audits arranged to ensure compliance.
- d) Investigate ways of working closer with and participate in joint initiatives with the Health Protection Agency (HPA) and Primary Care Trusts (PCTs).