



**ENVIRONMENTAL HEALTH
AND
TRADING STANDARDS**

**FOOD
SERVICE PLAN**

2023/24

**Powys County Council
County Hall
Llandrindod Wells
Powys
LD1 5LG**

ENVIRONMENTAL HEALTH AND TRADING STANDARDS

FOOD SERVICE PLAN 2023/24

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EXECUTIVE SUMMARY

This Service Plan sets out the way in which food hygiene and food standards enforcement will be carried out in the County of Powys by the Environmental Health and Trading Standards services of the Authority in 2023/24. The Plan aims to communicate how national and local priorities and standards are addressed.

The Service Plan is an annual plan and is effective from 1st April 2023. The Plan is published and available on the Authority's website. Comments on the Plan are invited throughout the year, and these are considered when the following year's Plan is produced. The Plan is approved by the Authority prior to publication.

There are 2953 food premises in Powys, ranging from major manufacturing businesses to small corner shops. There are also an estimated 5000 premises that may be subject to food hygiene at primary production controls, these include livestock and arable farms.

The delivery of the food inspections/interventions in Powys is divided between two teams, Environmental Health (Commercial) and Trading Standards who cover very different aspects of the delivery.

	No. of Officers (FTE) Allocated to food service	Number of Primary Inspections conducted (2022/23)	Number of Inspections Due/Overdue 2023/24*
Environmental Health (Commercial)	8.285	774	2,561
Trading Standards	2.5	277	1,509

* This figure includes all risk types – excludes 660 unrated premises for TS.

Primary inspections form only part of the Food Service provided to Powys businesses. Not included in the figures above are the number of businesses provided with advice, the number of food complaints, the number of food samples taken and many other food related activities.

The following is an extract from a recent communication (May 2023) to Local Authority Chief Executives I from Emily Miles, Chief Executive, Food Standards Agency, outline the importance of the work covered by a Food Service Plan:

Your food teams play a vital role in protecting public health, and protecting consumers from those who might exploit them by selling fraudulent or inauthentic food. They are the second line of defence, after the businesses themselves. That role becomes even more important at times when people and businesses are feeling the impact of the rising cost of living. An outbreak of foodborne disease can have devastating consequences for people's health, as well as for local and national food businesses; 160 people die each year from eating contaminated food, and over 15,000 receive hospital treatment. And a loss of trust in the authenticity of UK food can have long-lasting economic impacts, as we saw in the horsemeat scandal ten years ago, which is estimated to have cost UK industry over £800m. It is essential that food teams continue to have the resources they need to do the job.

INTRODUCTION

The Food Standards Agency (FSA) Framework Agreement¹ gives guidance to local authorities on how their Food Service Plan should be structured and what it should contain. Service plans developed under these arrangements will provide the basis on which local authorities will be monitored and audited by the Food Standards Agency.

Service plans are seen to be an important part of the process to ensure national priorities and standards are addressed and delivered 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;
- considered potential regional structures and changes to plans for the delivery of Trading Standards Services and
- provide a means of managing performance and making performance comparisons.

A Food Service Plan template is provided by the FSA to ensure that all the areas of the food enforcement service are included in the plan whilst allowing scope for the inclusion of any locally defined objectives. The template will ensure that local authorities will include in their service plans:

- information about the services they provide;
- the means by which they will provide those services, including the various requirements of the Standard;
- the means by which they will meet any relevant performance targets or performance standards;
- a review of performance in order to address any variance from meeting the requirements of the service plan.

¹ Framework Agreement www.food.gov.uk/enforcement/enforcework/frameagree/

1. SERVICE AIMS AND OBJECTIVES

1.1 AIMS AND OBJECTIVES

1.1.1 Aims

Local Authorities have a statutory duty to enforce food law as part of the UK's national "Official Controls" overseen and audited by the Food Standards Agency. Local Authorities must produce a plan setting out how they will deliver that function. This document discharges that duty for Powys County Council and has been written in accordance with The Food Standards Agency's Framework Agreement, which is based on statutory Codes of Practice. The service aims to ensure that food (including drink) intended for supply for human consumption that is produced, stored, distributed, handled or consumed in Powys is accurately labelled, compositionally satisfactory and without risk to the health or safety of the consumer.

1.1.2 Objectives

In producing this plan, Powys County Council has included a range of strategies, activities and interventions to discharge its statutory duties and to support the achievement of the Council's wider strategic objectives and relevant National Enforcement Priorities. We seek to balance a risk-based, proactive inspection programme (and, where necessary, proportionate enforcement action) with tailored advice and support for local businesses to help them comply. Trading Standards work to a National Intelligence model which makes decisions on priorities based upon threat and problems. We compliment this by providing information to the public to enable them to make informed choices about the food they consume. To aid us in this we will:

- Maintain an accurate and current record of all food premises.
- Conduct a co-ordinated sampling programme of food supplied or produced in Powys.
- Conduct a planned risk-based inspection programme of local businesses.
- Deal with complaints about food in a consistent and co-ordinated manner.
- Provide timely and informative advice to local food businesses.
- Investigate and control outbreaks and food related infectious diseases.
- Respond to food safety incidents in relation to the food hazard warning system.
- Deliver the National Food Hygiene Rating Scheme.

1.2 LINKS TO CORPORATE OBJECTIVES / PLANS / REGIONAL PLANS

1.2.1 Powys County Council's new Cabinet launched their vision for the county in July 2022 and the Cabinet introduced their vision to build a stronger, fairer, greener Powys. Cllr James Gibson-Watt, Leader of Powys County Council, said:

"Following the local government elections in May [2022], a progressive partnership agreement was reached to allow a new administration to be

formed to lead Powys County Council. This agreement provides a firm foundation that builds a stronger, fairer and greener future for Powys. We are now building on this to set clear objectives and a work programme to meet what we set out to achieve.”



1.2.2 The Food Plan also closely aligns to wider regional and national plans set by the Heads of Trading Standards Wales (TSW) and Welsh Heads of Environmental Health (WHOEH).

1.3 LINKS TO FOOD STANDARDS AGENCY (Wales) PRIORITIES

Food

1.3.1 National Enforcement priorities have been produced by the Food Standards Agency, although not currently adopted in Wales, it is envisaged that they will be at some stage. Other areas may emerge from the FSA `emerging risks` team.

2. BACKGROUND

2.1 PROFILE OF THE AUTHORITY

2.1.1 Population and area

Powys is a rural area covering a quarter of the land mass of Wales.

Population	133,030
Area (hectares)	517,900

2.1.2 Administration

The Authority's headquarters is in County Hall, Llandrindod Wells. Service delivery points are located across the County.

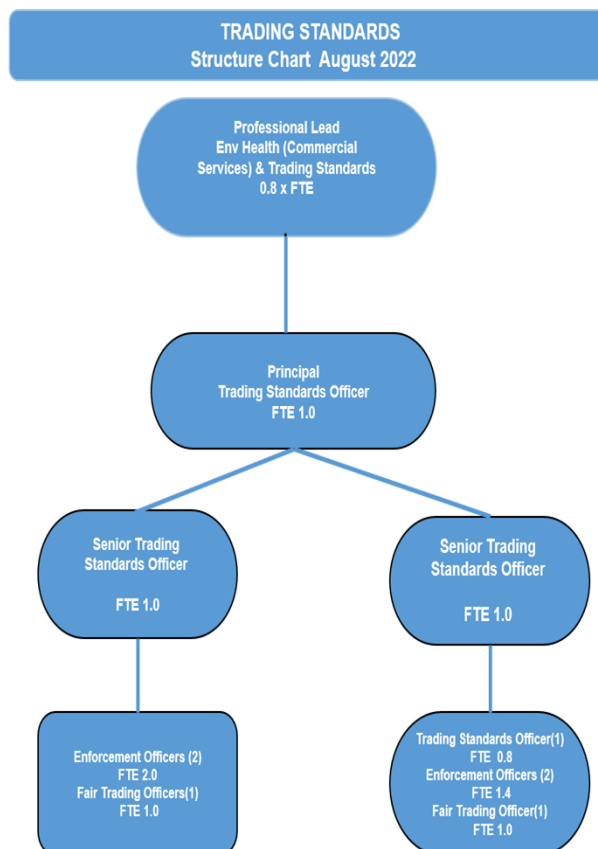
2.2 ORGANISATIONAL STRUCTURE

2.2.1 Environmental Health and Trading Standards is part of the Environment Directorate, reporting through a Professional Lead Officer of Environmental Health (Commercial Services) and Trading Standards to the Head of Property, Planning and Public Protection and to the Director of Economy and Environment.

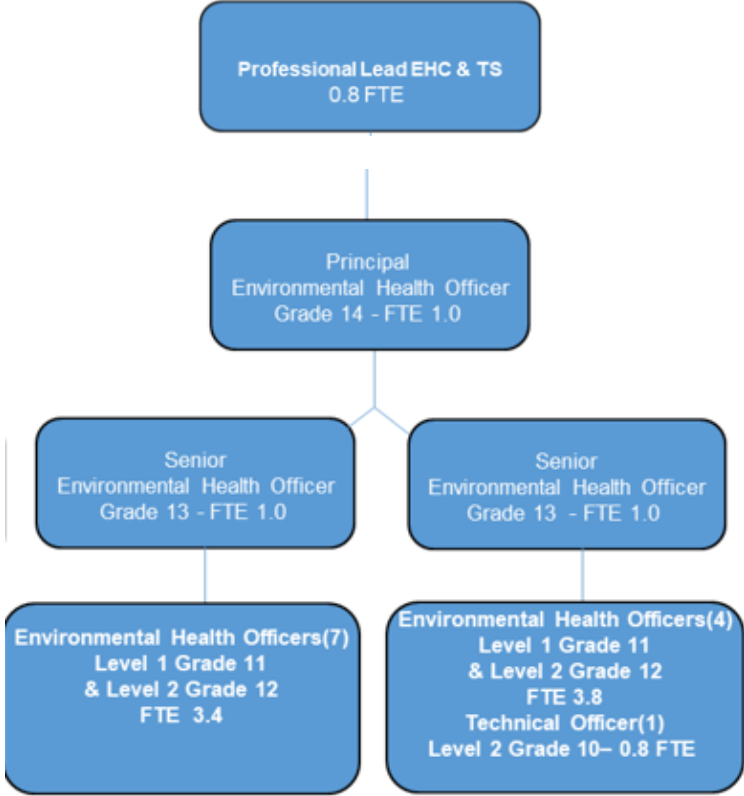
2.2.2 Sections 11 and 13 of The Council's Constitution sets out the responsibility for functions and officers, whilst The Leader's Scheme of Delegation of Executive Functions sets out the responsibilities of the ten Cabinet Members. County Councillor Richard Church is responsible for Food Official Controls exercised through the Director of Environment. County Councillor Richard Church is the Cabinet Member for a Safer Powys.

2.2.3 The Food Service is located within the Economy and Environment Directorate with food hygiene and infectious disease control delivered by the Environmental Health - Commercial Team and food standards and food hygiene at primary production (limited to feed hygiene interventions) by the Trading Standards Team.

2.2.4 Trading Standards staff structure (for all Trading Standards Activities)



2.2.5 Environmental Health – Commercial staff structure (covering Food, Health & Safety, Communicable Disease and Public Health) (not just Food Hygiene)



2.2.6 Analytical Arrangements

Due to the large geographical area of the County a number of Public Analysts have been appointed as follows:-

Public Analysts

<p>Mrs S Brookes and Mr Alastair Low Minton, Treharne and Davies Ltd Forest Farm Industrial Estate Longwood Drive Coryton CARDIFF CF14 7HY</p>	<p>Michelle Evans, Emma Downie, Gary Burton, Jeremy Wootten and Duncan Arthur Eurofins Ltd. Consulting Chemists & Microbiologists, Woodthorne, Wergs Road, Wolverhampton, WV6 8TQ</p>
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Public Health Laboratory Service

<p>Food Water & Environmental Services, Public Health Wales, Llandough Hospital, Penlan Road, Penarth CF64 2XX</p>
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2.3 SCOPE OF THE FOOD SERVICE

2.3.1 Inspections and Joint Working Arrangements

The Environmental Health and Trading Standards services share their responsibilities for food enforcement in line with the Food Law Code of Practice and accompanying guidance². The managers of these two teams work closely together to facilitate cohesive, joint working between the two teams and outside bodies. When required, they will liaise with the Food Standards Agency and other regulatory bodies to co-ordinate any responses required.

2.3.2 Environmental Health

The Service holds responsibility for Food Hygiene Inspections, Food Hygiene Rating Scheme (FHRS) and approved premises inspections, advice, complaints, microbiological food sampling, food export certification, food safety promotional work, food poisoning investigations and management and handling of food hazard warnings. Other services delivered alongside the food hygiene service include Health and Safety, Public Health, Communicable Disease, Smoking Ban and occasional licensing inspections.

2.3.3 Trading Standards

The Service holds responsibility for food standards inspections and complaints, food hygiene at primary production premises limited to feed hygiene interventions, food sampling for compositional and labelling requirements and chemical contamination, and food standards promotional work. Other services for which Trading Standards are responsible include licensing and registration of fireworks/explosives/petroleum, animal health and welfare, fair trading, intellectual property crime, rogue traders, consumer fraud prices, descriptions, product safety, consumer credit and weights and measures.

2.3.4 Contractors

External contractors are occasionally employed by both Services to carry out some food hygiene and food standards inspections. Analytical and testing functions are carried out by external Public Analyst and testing laboratories.

2.4 DEMANDS ON THE FOOD SERVICE

2.4.1 Premises Profile

The demands on the food service vary from year to year as premises open and close. Interventions are chosen and programmed at a frequency dependent upon the risk that they pose to food safety and food standards. A breakdown of the establishment profiles that are located within Powys, subject to food safety and/or food standards regulation is provided below.

Type of Premises	Number of Premises
Primary Producer	166
Manufacturer / Packer	93

² Food Law Code of Practice Wales & Food Law Practice Guidance Wales www.food.gov.uk/enforcement/enforcework/foodlawcop/codepracticewales/

Importer / Exporter	2
Distributer/Transporter	56
Retailers	469
Restaurants (Hotel, Café, Canteen, Pub/Club, Take-away, Caring Establishment, School/College, Mobile Food Unit etc.)	2290
Total number of premises	2953

There are 2953 food premises in Powys, of which the majority are registered food premises.

2.4.2 Approved Premises

The breakdown above includes approved premises under product specific regulations of which there are currently the following number:

TYPE OF PREMISE	TOTAL
Minced Meat Products	2
Meat Products	3
Dairy Products	2
Fishery products	0
Egg Products	32
Cold Stores	2

There are also a total of 4 water-bottling plants within the County which require application of specific legislation.

The Authority has a high turnover of businesses which results in a high turnover of catering staff with varying food safety/food standards knowledge and experience. Last year in 2022/23, 274 new businesses were inspected, risk rated and awarded FHRS ratings for Food Hygiene and 139 were inspected for Trading Standards.

2.4.3 Environmental Health (Food Hygiene) premises profile by risk rating 23/24

Risk Category	Minimum Inspection Frequency	No. of premises
A	At least every 6 months	14
B	At least every 12 months	55
C	At least every 18 months	672
D	At least every 2 years	537
E	Alternative enforcement strategy	1283

2.4.4 Trading Standards (Food Standards) premises profile by risk rating 23/24

Risk Category	Minimum Inspection Frequency	No. of premises
A	At least every 12 months	21
B	At least every 2 years	905
C	At least every 5 years	583
Unrated	Never had a Primary Inspection	660

2.4.5 Service Delivery Points

Service is delivered from locations throughout the County as detailed below. Normal office hours are 8.30am - 4.45pm Monday to Thursday and 8.30am - 4.15pm Friday. The Authority operates 'on a good will basis' an out of hours emergency service on 0845 0544874.

Trading Standards

The service has a delivery point in the following areas:

The Gwalia Ithon Road Llandrindod Wells Powys LD1 6AA	Kirkhamsfield Depot Newtown Powys SY16 3AF	Neuadd Brycheiniog Cambrian Way Brecon Powys LD3 7HR
01597 826032	01686 617524	01874 623420
trading.standards@powys.gov.uk		

Environmental Health

The service has a delivery point in the following areas:

The Gwalia Ithon Road Llandrindod Wells Powys LD1 6AA	Ty Maldwyn Brook St, Welshpool Powys SY21 7PH	Neuadd Brycheiniog Cambrian Way Brecon Powys LD3 7HR
01597 827467		
environmental.health@powys.gov.uk		

In addition to the hours indicated above, officers conduct unannounced visits and investigations at other hours than those listed above.

2.4.6 External factors which impact on the service including Food Fraud and other threat analysis

A seasonal activity that impacts considerably on the food service is the Royal Welsh Agricultural Show, which is held annually at Llanellwedd, near Builth Wells. As one of the largest agricultural shows in Europe with more than 200,000 visitors, it demands proactive work prior to and a considerable amount of planned and reactive work during the week-long show. Routine work during this period is curtailed and officers' attentions centred on the event. The showground is also used during the year for many other special events.

Other major annual events impacting on routine work are the Green Man Festival, Brecon Jazz, Hay on Wye Literature Festival, and other festivals throughout the year.

Trading Standards use input from an intelligence-based model of delivery in accordance with the Heads of Trading Standards Wales's control strategy. Intelligence is shared through an IDB (Intelligence Data Base) system, accessed by the FSA National Food Crime Unit. Trend analysis of previous years activities is undertaken to identify emerging threats, our priorities are constantly reviewed, and plans amended accordingly.

Powys is occasionally a target for groups involved in the illegal slaughter and supply of meat. A substantial amount of officer time has been taken up investigating these activities. Officers are also actively involved in partnership work with the Police and the National Food Crime Unit in relation to these and other issues.

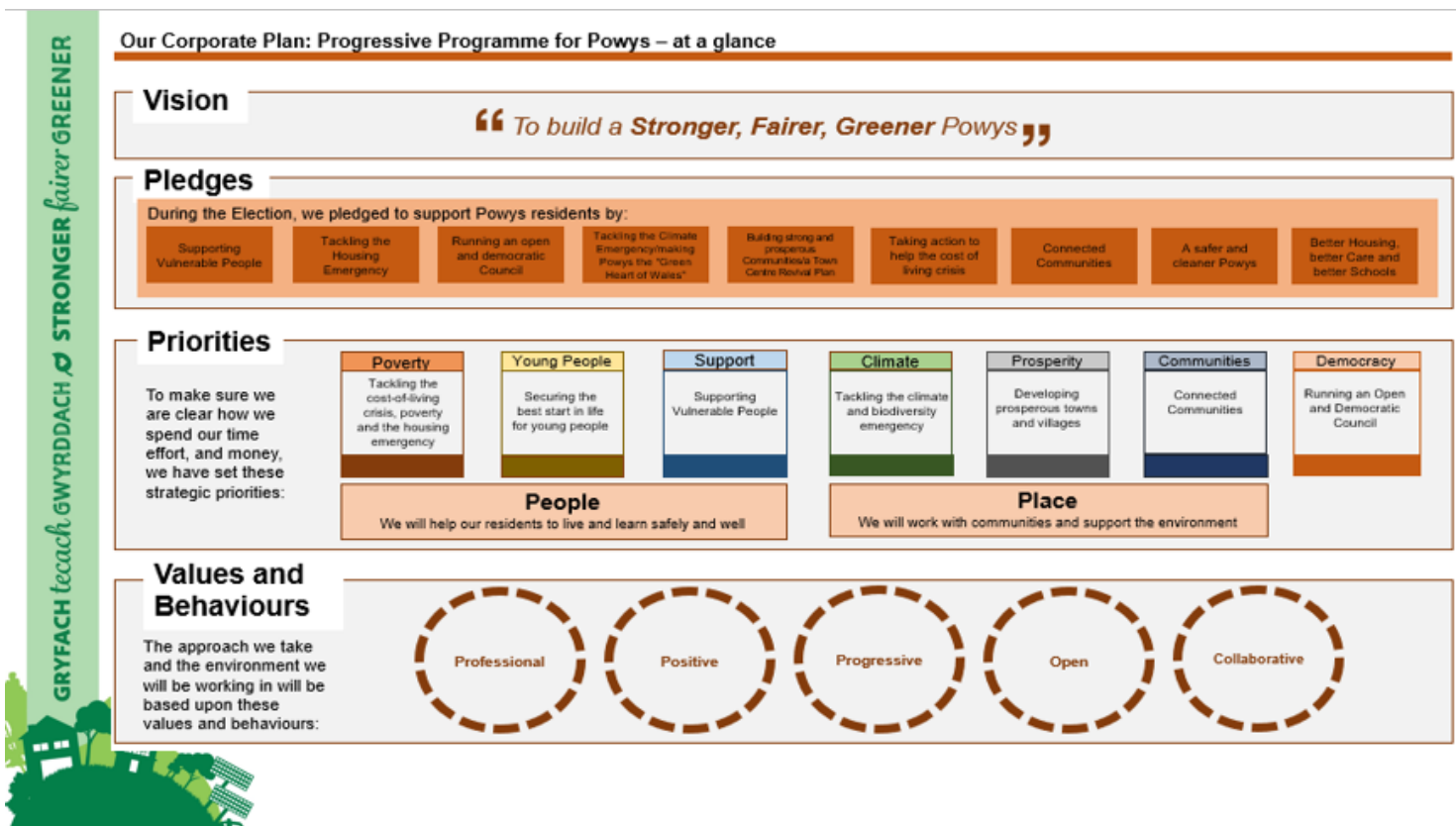
We are not able to quantify with certainty the number of businesses whose owners' first language is not English. We communicate effectively with most using friends or family members to translate where necessary and using "Safer Food Better Business" available in many different languages. The information in respect of the safe supply of foods containing allergenic ingredients is available across various media and in a variety of languages. Where necessary we use the translators from the Welsh Interpretation and Translation Services. It is estimated that less than 1% of all food premises have owners whose first language is not English.

We have no direct importers of food. However, we have several businesses, which supply imported foods and they are included in our programmed inspections.

2.5 LINKS WITH POWYS COUNCIL PLANS/ ENFORCEMENT POLICY

2.5.1 Powys County Council's Vision is:

To build a stronger, fairer, greener Powys



The Corporate Plan sets out the council's vision for the future of Powys.

2.5.2 To achieve these priorities, we will:

- direct and enhance our services to support our local businesses and communities

- provide the necessary guidance and support to assist businesses to start up and develop
- encourage people to comply with the law in the interests of our wider communities.

The Enforcement Policy documents the Council's legal powers to protect our communities from harm, we will use them in a proportionate manner. There are a variety of regulatory tools from serving formal letters and notices requiring people to carry out certain actions, and/or prohibited from carrying out certain business activities, to prosecution which could result in fines and/or imprisonment. We will also include proportionate action under the Proceeds of Crime Act 2002 where needed to take the assets from criminals who have benefitted from food fraud.

- 2.5.3 The Enforcement Policy sets out the Council's approach to enforcement of its legal powers. It is intended to establish a uniform approach to enforcement throughout the Council, without placing too onerous a burden on local businesses, organisations, consumers, and the public. The policy has been developed with the Enforcement Concordat's principles of good enforcement as it's foundation as well as the principles of the Regulators' Code. Trading Standards and Environmental Health officers receive ongoing training on RIPA, PACE and any other evidential enactments to support the enforcement competencies and development of officers.

3. SERVICE DELIVERY

3.1 FOOD INSPECTIONS

- 3.1.1 During 21/22 and 22/23 Powys County Council undertook food hygiene and food standards inspections as outlined in the FSA COVID-19 Local Authority [Food] Recovery Plan. Initially the Recovery Plan (RP) was created by Central Government to ensure the UK could continue to supply and satisfy the regulatory food chain requirements and to continue to export throughout the world during the pandemic. The RP included a derogation from the inspection frequencies specified in the Food Law Code of Practice (Wales), due to the impact on service delivery as officers were frontline in preventing the spread of infection and protecting the most vulnerable in our communities.
- 3.1.2 The Recovery Plan (RP) set out the FSA's guidance and advice to local authorities for the period from 1st July 2021 to 31st March 2023. The guidance and advice aimed to ensure that during the period of recovery from the impact of COVID-19, local authority resources were targeted where they added greatest value in providing safeguards for public health and consumer protection in relation to food. It also aimed to safeguard the credibility of the Food Hygiene Rating Scheme (FHRS).
- 3.1.3 The Recovery Plan provided a framework for re-starting the delivery system in line with the Food Law Codes of Practice for new food establishments and for high-risk and/or non-compliant establishments while providing flexibility for lower risk establishments. Which was implemented alongside the delivery of:

- official controls where the nature and frequency are prescribed in specific legislation and official controls recommended by FSA guidance that support trade and enable export
- reactive work including enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints
- sampling, and
- ongoing proactive surveillance.

3.1.4 In February 2023, the FSA wrote to Public Protection (EH/TS Teams) in England, Wales and Northern Ireland to communicate their decision to bring the formal Recovery Plan to an end on 31 March 2023. In May 2023, this message was further communicated via formal correspondence from the FSA to all LA Chief Executives, stating:

- *However, we are aware that challenges remain. Many local authorities still have a backlog of lower risk businesses to work through, alongside a return to normal performance expectations. The food industry has been evolving rapidly, with new trends such as the rapid growth in online food sales posing new challenges to food teams. There are further system changes to come, like the implementation of a new operating model for UK border controls.*
- *As the national regulator, the FSA has a statutory duty to monitor the performance of local authorities and port health authorities in delivering official controls for food safety and standards. Having brought the Recovery Plan to an end, we will now work with local authorities in a more bespoke way, to ensure a return to delivery of pre-pandemic levels of service. We will take a risk-based and pragmatic approach to performance management as services work to realign with the Food Law Code of Practice and to ‘catch up’ on backlogs of lower risk premises created by the pandemic.*
- *Your food teams play a vital role in protecting public health, and protecting consumers from those who might exploit them by selling fraudulent or inauthentic food. They are the second line of defence, after the businesses themselves. That role becomes even more important at times when people and businesses are feeling the impact of the rising cost of living. An outbreak of foodborne disease can have devastating consequences for people’s health, as well as for local and national food businesses; 160 people die each year from eating contaminated food, and over 15,000 receive hospital treatment. And a loss of trust in the authenticity of UK food can have long-lasting economic impacts, as we saw in the horsemeat scandal ten years ago, which is estimated to have cost UK industry over £800m. It is essential that food teams continue to have the resources they need to do the job.*
- *We want to keep supporting you in this important work, and to work with you to ensure that food safety and standards remains a high priority for you.*

- *Thank you for your ongoing commitment and support and we would like to record our thanks to your teams for all their hard work under the unprecedented strain of the last three years.*

Emily Miles, Chief Executive, FSA

3.1.5 We will endeavour to bid for external funding that may become available throughout the year. The FSA have in previous years, invited local authorities to bid for grant funding to undertake targeted intervention activity in relation to food safety management systems and/or sampling. We will submit bids for any such funding made available during 2023/24 providing we can secure sufficient staff resource to deliver the work. Contractors would be considered to support the delivery if they are available and are cost effective.

3.1.6 Local Performance Indicator targets exist in relation to Food Hygiene and Standards, which are;

Measure	Statutory Requirement Local Target
Food Hygiene	
The % of food establishments which are "broadly compliant" with food hygiene standards.	90% Annual
Percentage of Food Hygiene Inspections/Interventions carried out in accordance with Food Law Code of Practice Requirements.	Statutory Requirement 100% Local Target 32%
Percentage of 'category A risk' Food Hygiene Inspections/ Interventions carried out in accordance with Food Law Code of Practice Requirements.	Statutory Requirement 100% Local Target 100%
Percentage of 'category B risk' Food Hygiene Inspections/ Interventions carried out in accordance with Food Law Code of Practice Requirements.	Statutory Requirement 100% Local Target 100%
Percentage of 'category C risk' Food Hygiene Inspections/ Interventions carried out in accordance with Food Law Code of Practice Requirements.	Statutory Requirement 100% Local Target 100%
Percentage of 'category D risk' Food Hygiene Inspections/ Interventions carried out in accordance with Food Law Code of Practice Requirements.	Statutory Requirement 100% Local Target 8%
Percentage of 'category E risk' Food Hygiene Inspections/ Interventions carried out in accordance with Food Law Code of Practice Requirements.	Statutory Requirement 100% Local Target 4%
Measure (cont.)	Statutory Requirement Local Target
Food Hygiene (cont.)	

Percentage of new businesses identified which were subject to a Food Hygiene Inspection/Intervention carried out in accordance with Food Law Code of Practice Requirements during the year.	Statutory Requirement 100% Local Target 95%
Food Standards	
Percentage of Food Standards Inspections/Interventions carried out in accordance with Food Law Code of Practice Requirements.	Statutory Requirement 100% Local Target 23%
Percentage of 'category A risk' Food Standards Inspections/Interventions carried out in accordance with Food Law Code of Practice Requirements.	Statutory Requirement 100% Local Target 100%
Percentage of 'category B risk' Food Standards Inspections/Interventions carried out in accordance with Food Law Code of Practice Requirements.	Statutory Requirement 100% Local Target 30%
Percentage of 'category C risk' Food Standards Inspections/Interventions carried out in accordance with Food Law Code of Practice Requirements.	Statutory Requirement 100% Local Target 8.5%
Percentage of new businesses identified which were subject to a risk assessment visit or returned a self-assessment questionnaire during the year – Food Standards.	Statutory Requirement 100% Local Target 95%

3.1.7 We will investigate instances of food fraud as they arise in conjunction with partner organisations. Food fraud is committed when food is deliberately placed on the market for financial gain, with the intention of deceiving the consumer. The Authority takes the issue of food fraud very seriously and when it does occur has a responsibility to protect the consumer. Incidents where there are concerns about the actual or suspected threat to the safety or quality of food that could require intervention to protect consumers' interests will be investigated.

3.1.8 Our routine food hygiene and food standards inspections/interventions and complaint investigation work will take account of importers and other businesses handling imported food and imported food related issues. Steps will be taken to assess the legality of imported food and effective action taken on non-compliance to protect public health. We will aim to identify businesses importing food into Powys. Risk based, systematic and proportionate checks on imported food will be carried out at a frequency that prioritises and reflects the risks presented by individual food businesses. If resource permits, we will pro-actively undertake food sampling at businesses that have been identified as either importing food directly or displaying for sale food which has been imported.

3.1.9 Trading Standards

Food Standards

The primary aim of food standards official controls, interventions and inspections is to ensure that the legal requirements are met covering:

- the quality, composition, labelling, presentation and advertising of food, and
- materials or articles in contact with food
- traceability, origin of food and claims concerning nutrition and health benefits.

3.1.10 All qualified food officers are appropriately trained and competent to fulfil their duties in accordance with the requirements of the Food Law Code of Practice and possess the appropriate expertise to enable competent inspection of any specialised processes with the Authority.

3.1.11 Annual targets on food work are set for officers to carry out inspections to A (annual inspection), B (inspection every 2 years) and C (inspection every 5 years) risk premises and other food work. These are agreed and reviewed at regular Appraisals, individual target discussions and Team meetings. This Plan is approved by the Director and then by Members of the Authority.

The number of food standards inspections **due** for 2020 to 2023 follows: -

Risk Category	A	B	C	Total
No. of inspections due (2019/20)	21	390	267	677
No. of inspections due (2020/21)	21	131	110	261
No. of inspections due (2021/22)	21	113	21	154
No. of inspections due (2022/23)	21	114	50	185
No. of inspections due (2023/24)	21	95	23	139

The actual number of premises **due and overdue** in accordance with the Food Safety Act Code of Practice for inspection/intervention in 2022/23 and 2023/24 are as follows:

Risk Category	A	B	C	Total
No. overdue/due in 2022/23	21	812	615	1448
No. overdue/due in 2023/24	21	905	583	1509

With the current resources it is estimated that the following food standards inspections will be achieved in 2023/24:

Risk Category	A	B	C	Total
No. due to be targeted in 2022/23	21	200	40	261
No. due to be targeted in 2023/24	21	275	49	345

The new business process will identify additional B rated premises; this is due to the nature of the activities being undertaken. This figure is not included in the above table, the majority of the new businesses will be B rated.

Year	Number of New Businesses Identified
2019/20	308
2020/21	229
2021/22	275
2022/23	220

In 2022/23 a new Food Standards Performance Indicator for new businesses was introduced, 95% of new businesses to be visited, that equates to a figure of 245 visits (based on an average of the figures above x 95%).

The following outcomes were achieved between 2019 and 2022, these have influenced the prioritising of work in 2023/24.

Year	2019/20	2020/21	2021/22	2022/23
%age of food samples failed on composition	25	0 (covid)	33	38
Number of food investigations	30	2	3	1
Written warnings	53	4	57	110

- The food sample failures on composition informed the prioritisation of work and added increased pressures with the need to investigate and action all unsatisfactory samples;
- 2 Food Incidents were reported to the FSA Incidents Team during the period 2019/20 to 2021/22.

There is recognition that for B and C rated premises the targets figures sit outside the requirements of the Code but the recommendation and decision to undertake this is based upon the following rationale to use the resources currently available.

- Trading Standards has increased the use of intelligence to direct food matters, resulting in increased focus on investigations, and directed project work on matters of immediate threat such as allergens.

Intelligence in relation to these premises will be reviewed to ensure that they have been correctly risk rated and visited where possible and appropriate.

3.1.12 Revisits

Year	2019/20	2020/21	2021/22	2022/23
Number of Revisits carried out to food premises	40	1 (covid)	5	7

It is estimated that around 10 revisits will be carried out to food premises in 2023/24 based on the previous year's figures.

3.1.13 Food Hygiene at primary production

The Food Standards Agency hypothecated funding for the delivery of Feed Hygiene in 2015/16 to a predetermined programme. The delivery of food hygiene at livestock farms (primary production) has been incorporated into the Feed Hygiene visit but is not currently funded under this programme and is retained within the Revenue Support Grant.

3.1.14 Environmental Health

Food Hygiene

The primary aim of all food hygiene and safety interventions shall be to:

- Identify potential hazards and assess their risks to public health arising from activities within the food business;
- Assess the effectiveness of management control to achieve safe food;
- Identify specific contraventions of food hygiene law.

3.1.15 The Environmental Health Team will aim to ensure that interventions are carried out in accordance with the Food Safety Act Code of Practice for Category A – C premises and the Inspection Rating System will be used to determine the frequency of programmed interventions within a range of 6 months to 3 years. Programmed unannounced inspections shall be used for the purpose of determining the frequency of further programmed inspection interventions.

The actual number of premises overdue/due in accordance with the Food Safety Act Code of Practice for inspection/intervention in 2023/24 are as follows:

Risk Category	A (Minimum Inspection Frequency – At least every 6 months)	B (Minimum Inspection Frequency – At least every 12 months)	C (Minimum Inspection Frequency – At least every 18 months)	D (Minimum Inspection Frequency – At least every 2 years)	E (In line with alternative enforcement strategy)	Total
No. overdue on 1 st April 2023	0	0	83	307	1,275	1,665
No. due/ overdue in 2023/24	14	55	672	537	1,283	2,561

The total number of food hygiene overdue/due inspections (not including new business inspections or Food Hygiene Rating Scheme (FHRS) Re-rate inspections) required to be carried out in accordance with the Food Safety Act Code of Practice by the food hygiene service during 2023/24 is therefore 2,561.

3.1.16 The 2,561 inspections as explained in 3.1.6 and 3.1.15 will be unachievable in 23/24 due to the backlog accumulated during the pandemic and the current resource available. The aim is to achieve and undertake on a risk-based approach all category A, B and C overdue/due inspections by 31st March 2024. With a further 8% of category D and 4% of category E premises being targeted, through mainly a system of most overdue. It must be acknowledged that the LA will not be compliant with the Code of Practice, and around 90% of category D premises which include:

- Cafes, Coffee Houses, Public Houses, Restaurants, Hotels
- Village Shops, Convenience Stores, Supermarkets
- Primary Producers, Food Manufacturers
- Sports Clubs, Military Facilities, Outdoor Education Centres
- Mobile Food premises, Takeaways, Outside Caterers
- Childrens Nurseries, Primary and High Schools (60 plus)
- Childrens, Adults & Elderly Care Homes

Will remain overdue an inspection by up to 4 years on 31st March 2024.

3.1.17 Under the Food Law CoP Food Hygiene premises rated as Category E are not required to be subject to primary inspection but must be subject to an alternative enforcement strategy not less than once in any 3-year period. Prior to the pandemic we maintained regular contact with this category of business through newsletters and information sharing via email, Twitter feeds etc. and a proportion were verified via on-site spot checks. Previously we targeted those remaining due an intervention with a questionnaire to verify that there had been no significant changes within the business. Other intelligence-based projects were also adopted during the year based on sampling results or new regulations or guidance.

3.1.18 Due to the current backlog of inspections within Category C-D premises and the recent cut of 1 x FTE EHO there is currently insufficient capacity, or a planned strategy to deal with the 1283 Category E Food Hygiene establishments overdue an intervention. Other than dealing with triggers for inspections such as consumer complaints, new proprietors identified via food registrations/ planning/ licensing, and where information/intelligence suggests that risks have increased/ standards have fallen or if the establishment is otherwise considered a priority for intervention due to the risk posed.

3.1.19 Revisits

Year	2019/20	2020/21	2021/22	2022/23
Number of Revisits carried out at food premises	195	5 (Covid)	111	139

It is estimated that 150 revisits will be carried out to food premises in 2023/24 based on the previous year's figures.

3.1.20 Food Hygiene Rating Scheme (FHRS) Re-rate Inspections

Year	2019/20	2020/21	2021/22	2022/23
Number of FHRS Re-rate Inspections requested and undertaken at food premises	94	3 (Covid)	41	49

It is estimated that 65 requests for a FHRS re-rate inspections will be carried out to food premises in 2023/24 based on the previous year's figures.

3.1.21 Food Hygiene Registration (new Food Business Operator) Inspections

Year	2019/20	2020/21	2021/22	2022/23
Number of Food Hygiene Registrations received, and inspections undertaken at premises	348	273 (Covid)	300	311

It is estimated that 300 Food Hygiene Registration inspections will be carried out at food premises in 2023/24 based on the previous year's figures.

3.1.22 To ensure adequate expertise is available to enable competent inspections of specialised processes, officers are generally given a specialism in a product specific field, e.g., dairy products, meat products/preparations, drinks manufacturing, egg packers etc. and concentrate on the development of consistent and thorough inspections in these specific fields of food safety. These officers are then identified for appropriate training available in their specialist fields.

3.1.23 Furthermore, should a situation arise where expertise was not available in-house this would either be achieved by the necessary training or by identifying and bringing in the necessary expertise.

3.1.24 Officers will carry out inspections of those businesses open outside office hours as required.

3.2 FOOD COMPLAINTS

3.2.1 Trading Standards

The service is responsible for dealing with complaints about allergens, labelling, composition and claims in respect of food. First line consumer complaints are dealt with by Citizens Advice Consumer Service with matters requiring action being referred/notified to Trading Standards. Complaints concerning allergens are either, 'warm-transferred' to Trading Standards or referred directly to a Food Officer for the appropriate action. This would explain the consistency in complaint figures.

COMPLAINTS RECEIVED	
Food Standards	
2019/20	22
2020/21	5
2021/22	31
2022/23	34
2023/24 (predicted)	30

It is estimated that **3** food complaint samples will be submitted for analysis in 2023/24. This will require the following resources: Intelligence will flow from these complaints.

- * Food complaints (3 samples analysed):

Analyst fees (3 x £150) = £450
Officer time (6 days) + expenses = £1800
Total = £2250

3.2.2 Environmental Health

The service is responsible for investigating complaints of contamination of food by micro-organisms or toxins and the contamination of food by mould or foreign matter. Chemical contamination of the food will be investigated if the food poses an imminent risk to health.

Besides complaints relating to food contamination, the team also deal with food complaints concerning unsatisfactory conditions and concerns at food premises.

Food complaints are dealt with in accordance with departmental procedure and Codes of Practice and guidance.

The number of food complaints received in previous years are as follows:

COMPLAINTS RECEIVED	
Food Hygiene	
2019/20	93
2020/21	72
2021/22	93
2022/23	83

Resources required to deal with food complaints can vary dramatically from the straightforward to the more complex requiring significant research, analytical fees,

complex investigations and associated enforcement actions. We anticipate in the region of 90 food complaints during 23/24.

3.3 HOME/ PRIMARY AUTHORITY PRINCIPLE

3.3.1 Home Authority: Powys County Council has adopted this informal arrangement principle to providing the service, as required and staff resource permitting. The Authority currently acts as Home Authority for some food businesses in the area and these arrangements are constantly under review.

3.3.2 Primary Authority: Powys County Council recognises the legal status of the Regulatory Enforcement Sanctions Act 2008 and businesses operating under Primary Authority arrangements developed by the Better Regulation Delivery Office (BDRO) now called Department for Business, Energy and Industrial Strategy (BEIS) since July 2016. Regulatory and enforcement action is undertaken in a manner which is consistent with this. In recent years the Authority has participated in the Primary Authority (PA) Scheme if approached by a suitable business and has actively worked with businesses on developing agreements for food hygiene.

In May 2022, Powys terminated having given 3 months' notice our Primary Authority partnership with a national chain as their single Powys premises ceased trading, and it was deemed the LA was not able to support the company appropriately. At present the LA has two PA partnerships with Powys Businesses. Due to limited staff resource the PA scheme has been suspended and no further agreements will be entered into, until the team are able to carry out the required workload.

3.4 ADVICE TO BUSINESSES

3.4.1 Scope of Advice Service

The Authority recognises the importance of responding positively to requests for advice or guidance from food businesses. Providing advice and guidance, promotes compliance, reduces the need for formal enforcement action and helps build a positive working relationship between the enforcement officers and businesses. Advice to existing and new business is provided in the following ways:

- On receipt of a new Food Registration notification, an email is forwarded to the new Food Business Operator (FBO) detailing statutory requirements, guidance and on-line links, to assist with achieving a good FHRS score and regulatory compliance
- Subsequent contact (phone call/email) is further made to the new business by an EHO, to ensure they fully understand their legal obligations, and to assist with achieving a good FHRS
- In response to a service request from the business
- During routine inspections and visits
- In response to a complaint
- In response to information passed from another local authority or agency
- Through Primary Authority/Home Authority liaison

- Signposting via topic or sector specific mass email merges
- Through social media campaigns, notifications and possible attendance at trade seminars.

Advice may be provided following a specific request or may be given proactively to update businesses on changes in legislation. A range of nationally produced guidance leaflets is available from the Business Companion www.businesscompanion.info website.

The Environmental Health Service had adopted a charging service for more extensive food hygiene advice provided beyond that required by statute. Due to the pandemic, including associated backlog of statutory function and reduced staff resource in the LA, this paid advisory service has been suspended.

3.4.2 **Contacts from Business**

The Food Service Teams give advice to businesses (especially new businesses). New entrants into the food business are unknown quantities. In Powys many have proved to be inexperienced, untrained and under-funded. New businesses therefore pose a potentially high risk, which needs to be addressed. We believe that early advice (ideally at the planning and design stage) helps Food Business Operators (FBOs) appreciate the systems and investment that are needed to run a food business safely and to ensure that their financial outlay is planned, minimised and wisely targeted. This drives up structural standards and provides an opportunity for early engagement with the FBOs to establish good food safety management systems. This supports local business at their most vulnerable stage and increases their chances of survival and prosperity. A reduced turnover rate of food business also brings dividends to the enforcing authority by driving up the rate of “broadly compliant” premises and builds competence and stability in the food business workforce. It reduces the need for the team to start from scratch with new entrants to the business and hence saves officer time and reduces the need for enforcement intervention.

Whilst we would ideally like to inspect all new premises within 28 days of them opening, in accordance with the Code of Practice, this is not always practicable due to other demands on our service. We have therefore set a target to inspect 95% for food hygiene and food standards.

3.5 **FOOD SAMPLING**

3.5.1 **Trading Standards**

Food Standards sampling is undertaken to protect public health, detect and deter fraudulent activities, verify that official controls are effective, give customer’s sufficient information to make informed choices, ensure that food standards are maintained, inform the enforcement approach, provide product quality advice to the producer, promote fair trade and deter bad practice. The Sampling Programme is formulated with the council’s Public Analyst to address issues that may have arisen locally and will be informed by guidance, liaison groups, intelligence, topical issues and public demands. (See Appendix C). Where breaches are found which

have a national or regional input then intelligence logs are produced on such breaches.

Participation in national and regional sampling surveys is included wherever possible. A contingency is made for complaint samples, which are dealt with as and when received. Monitoring of the sampling programme is continuous, with the sampling information being recorded in the Team Sampling Matrix, including results and actions. A service level agreement with the Public Analyst is in place that covers the storage and transportation of samples, reporting times and payments.

The Service will bid for additional food samples where the opportunity arises through the Food Standards Agency.

Samples		
Food Standards		
	Number taken	% Failure
2018/19	67	31.4
2019/20	64	25
2020/21	0	N/A
2021/22	55	33
2022/23	53	38
2023/24 (planned)	67	-

The failures for 2022/23 included; meat content in sausages being less than that declared; incorrectly labelled honeys; banned colours (because of their link to increased risk of cancer) being used in food and a number of samples failed due to the presence of a none declared allergen, thereby being a health risk to anyone with an allergy to peanuts, milk or eggs (the allergens sampled for).

In addition, product screening takes place during the routine inspection at licensed premises to check the specific gravity of spirits using a hydrometer, to ensure that the alcohol hasn't been 'watered-down'. Screening also takes place using commercially developed indicators, to ensure that non-branded lower quality brands of spirits have not been substituted and passed off as market leading brands e.g., supermarket's own brand vodka being substituted for Smirnoff.

3.5.2 Environmental Health

The service participates in and is represented on the Welsh Food Microbiological Forum. Samples are obtained as part of the Welsh Food Microbiological Forum programme and further targeting of local producers, including Approved Premises which are not included within these initiatives are also carried out, to monitor the quality of locally produced foods. In addition to these locally driven and Welsh sampling programmes the Authority also participates in national microbiological food surveys.

Samples

Food Hygiene	
2018/19	350
2019/20	340
2020/21	0*
2021/22	45**
2022/23	83***
2023/24 (planned)	350+

* Covid, Laboratory suspended food sampling service

** Only Powys Approved Premises Sampling undertaken

*** Only Powys Approved Premises & Manufacturers Sampling undertaken

All such samples are submitted to Public Health Wales (PHW) Microbiological Service in Cardiff as detailed earlier in the plan for analysis. Currently within PHWMS the Service Level Agreement for Local Authorities has allocated Powys County Council a 'Baseline allocation for samples and associated sample costs' of £12,272. The sampling plan for 2023/24 is attached as Appendix D to this document.

3.6 CONTROL AND INVESTIGATION OF OUTBREAKS AND FOOD RELATED INFECTIOUS DISEASE

3.6.1 The Council works with Public Health Wales/ England in managing cases and outbreaks of food related infectious diseases. The Management and organisational arrangements for dealing with outbreaks of infectious disease are contained in 'The Communicable Disease Outbreak Plan for Wales', an All Wales model, agreed by the NPHS and Local Authority, and subject to annual review.

3.6.2 All cases are contacted, the necessary details collected, and advice given on precautionary measures to prevent the spread. Where necessary, exclusions are placed on persons considered to be within a high-risk category to ensure control of the organism in accordance with the Powys Plan.

Environmental Health - Commercial	
Notified & Investigated Infectious Diseases (exc. Covid-19)	
2019/20	225
2020/21	153 (Covid)
2021/22	266
2022/23	250

6.3.3 It is anticipated that approximately 250 cases of infectious diseases will be notified to Powys in 2023/24 based on statistics from previous years. The Authority is committed to the 'lead officer' concept introduced across Wales through which each Authority has a nominated officer undertaking more detailed training in communicable disease control. These officers not only provide a well-informed resource for their own Authority but could be called upon should a serious incident arise in another Authority to assist in the investigation and control.

6.3.4 Due to the pandemic laboratory technology has greatly improved, with huge investment and the consequences are technological advancements are detecting more infectious diseases (see table below) and subsequently the team are seeing an increased workload. For example, with E.coli cases which can be high-risk and

often involve complex investigations, with further faecal potting of cases, close contacts and exclusions of cases and close contacts from work and educational settings.

Environmental Health - Commercial	
Notified & Investigated E.coli cases	
2018/19	7
2019/20	7
2020/21	12
2021/22	27
2022/23	22

6.3.5 The number of bovine tuberculosis reactor herds has substantially increased in recent times, and this has involved officer time in investigations on the farms concerned to ensure no risk exists with milk production and consumption.

3.7 FOOD SAFETY INCIDENTS

3.7.1 The Authority recognises its obligations under section 40 of the Food Safety Act 1990 and the Code of Practice in relation to the food alerts and incidents system. Where the Authority identifies that food fails to comply with food safety requirements, they will inform all other potentially interested Authorities. The Authority will assess the scale, extent and severity of the hazard. In the event of it being a serious incident or a wider problem then they will liaise/notify the appropriate Central Government Department and formulate a food incident report that will be forwarded immediately to the relevant Government Department.

3.7.2 Both the food safety team and the trading standards teams have policies and procedures in place that deal with the action to be taken following the receipt of initiation of a food alert. The Food Standards Agency has the contact details for the Authority, including outside of normal working hours. The warning procedure for food incidents recognises that Food Alerts for Action (FAFA) are required to be dealt with quickly and are treated as a very high priority over other work of the sections. These alerts are received from the FSA via Smarter Comms. Powys County Council has an out of hours contact service for urgent matters.

3.7.3 All food and feed safety incidents will be responded to in a reasoned, measured and co-ordinated manner. Any response will comply with the Food or Feed Law Codes of Practice.

3.7.4 The number and scale of incidents and the risk associated with them cannot be predicted. Nor is it possible to provide a dedicated staff resource on standby to deal with any incidents that may arise. However, we have never failed to deal appropriately with any incident that has been reported. We have good working relationships with other organisations involved with providing emergency responses and we have tried and tested systems in place to facilitate a coordinated response. We are confident that, by deploying appropriately skilled staff from our establishment and working with partners, we shall continue to be able to provide a robust response on demand.

3.7.5 Allegations of food fraud are taken seriously, and the Authority will undertake investigations as necessary. Any food intelligence received is reported to the Regional Intelligence Analyst who will inform the National Food Crime Unit.

3.8 LIAISON WITH OTHER ORGANISATIONS

3.8.1 Close liaison exists between all twenty-two local authorities in Wales through the Directors of Public Protection Wales (DPPW), its Trading Standards and Environmental Health Groups and their Expert Panels.

3.8.2 Where our activities involve law enforcement it is important that we act consistently and proportionately. Our Enforcement Policy ensures that we follow due legal process and our involvement with professional networks facilitates technical debate leading to sharing of best practice and consistency between Local Authorities in Wales. These groups are also attended where appropriate by representatives from other bodies with coordinating roles such as the Food Standards Agency, National Food Crime Unit, Public Health Wales, Communicable Disease Surveillance Centre (Wales), Public Analyst, the Welsh Local Government Association, Welsh Government, Local Government Regulation, Chartered Institute of Environmental Health, Trading Standards Institute and the Regulatory Delivery Office.

3.8.3 We currently attend the following liaison groups:

- Directors of Public Protection Wales
- Heads of Trading Standards Wales
- Wales Heads of Environmental Health
- South-West Wales Food Safety Task Group
- Wales Food Safety Expert Panel
- FHRS All Wales Steering Group
- South-West Wales Communicable Disease Task Group
- Communicable Disease Expert Panel
- Wales Food Microbiological Forum
- Trading Standards Wales Food Standards and Labelling Group
- Mid and West Wales Food and Feed Group (currently suspended)
- National Agriculture Panel
- Government Agency Intelligence Network (GAIN)

3.8.4 Environmental Health and Trading Standards are Responsible Authorities under the Licensing Act 2003 and are consultees to the Council's Development Control Committee. Formal consultation networks are established within the Authority in respect of Planning, Building Control and Licence applications including Street Trading and Temporary Event Notices.

3.8.5 These functions can be time consuming, but the benefits justify the activity.

3.8.6 Trading Standards

Powys County Council is in the Mid and West Wales Region, with Carmarthenshire, Ceredigion and Pembrokeshire and regional co-ordination of food sampling. This group has not met for some time. The sampling work associated with Opson, an international food protection operation will not be known until later in the year, but provision of resources has been allocated to engage with this; in 2022/23 the area for investigation was protected food names.

A liaison meeting is held at least twice a year with Public Analysts, and other authorities in the Trading Standards Wales Food Standards and Labelling Group. The meeting provides a forum to discuss current enforcement issues and co-ordinated sampling programmes.

3.8.7 Environmental Health

To ensure enforcement action taken in the County is consistent with neighbouring Authorities a representative attends the South-West Wales Regional Food Safety Group and the South-West Wales Regional Communicable Disease Group. These are sub-groups of the Directors of Public Protection Wales (DPPW).

Attendance is also present on the following groups leading to further consistency in approach:

- All Wales Food Safety Expert Group
- FHRS All Wales Steering Group
- All Wales Communicable Disease Expert Group
- Welsh Food Microbiological Forum.

Regular liaison is undertaken with the National Public Health Service in relation to the investigation and control of food poisoning incidents, and with DEFRA in relation to zoonoses issues.

3.9 FOOD SAFETY AND STANDARDS PROMOTION

3.9.1 The service will participate in the annual National Food Safety Week campaign. This will be promoted across the County through various initiatives. Various other promotional events will be supported locally too.

3.9.2 The service participates in the Food Hygiene Rating Scheme, which helps consumers choose where to eat out or shop for food by giving them information about the hygiene standards in restaurants, cafés, takeaways, hotels and food shops. The schemes also encourage businesses to improve hygiene standards. The overarching aim is to reduce the incidence of food borne illness. Promotional work will continue to be carried out to promote the scheme.

Additional work required as a result of the rating scheme involves requests for re-ratings, appeals against ratings and monitoring checks for non-display. A number of fixed penalty notices (FPNs) are issued each year to FBOs running premises across the County but none have been prosecuted for non-display in the past year, due to subsequent prompt payment and display of their FHRS.

- 3.9.3 The Environmental Health Service in Powys routinely works with food business operators to highlight the importance of and assist with the implementation of suitable food safety management systems. The Safer Food Better Business (SFBB) food safety management system has been recommended during programmed inspections since the pack was launched.
- 3.9.4 In past years the Environmental Health Service has used funding provided by the Food Standards Agency to run Safer Food Better Business training events for food business operators and to undertake individual coaching sessions with a CMI consultant to assist further with the introduction of a system. The service was successful in its bid to the FSA for additional funding to enable the service to set up an email database for their businesses through which regular communications can be channelled along with Twitter feeds. Providing a more efficient and economical means of communication with the food business operators.
- 3.9.5 Business advice to micro businesses may be initially provided by signposting to websites such as the Business Companion. Offering a bilingual business advice service will continue to support and promote the growth of the local economy. Specific business sector advice is also provided through the Chartered Trading Standards Institute's Business Companion - a web-based information service.
- 3.9.6 The Trading Standards Service in Powys routinely works with food business operators in respect of the requirements of European and United Kingdom/Wales legislation specifically for food standards. Trading Standards actively engages with businesses, to promote the requirements in respect of allergens and to highlight the importance of conveying potentially life-saving information to consumers. Trading Standards advises businesses on the implementation of suitable allergy safety and food standards management systems.
- 3.9.7 The Service publicises food issues to inform businesses and the public, using a variety of techniques including:
- Press releases about current issues
 - Postings on council website
 - Social media through Facebook and Twitter pages
 - Powys Staff Newsletter

4. RESOURCES

4.1 FINANCIAL ALLOCATION

- 4.1.1 Details of the budgets allocated for 2023/24 can be found in the Appendices.

4.2 STAFFING ALLOCATION

4.2.1 Trading Standards

Number of FTE involved in Food Standards:	2.5
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	Qualifications				
Qualified & Competent Officers	DTS (Or equivalent)	DCA (inc. Paper IV)	DCATS (Or equivalent)	Lead Auditor	HACCP
Professional Lead				✓	✓
PTSO	✓			✓	✓
STSO	✓			✓	✓
TSO	✓				✓
EO		✓			✓
EO x 2			✓		

With regards to the analysis of the resource available against the resource required to deliver the service in full, it is evident that the current allocation of 2.5 (which includes a proportion of the Professional Lead Officer - Environmental Health (Commercial) and Trading Standards) FTEs is insufficient to address the outstanding visits and those due/overdue for inspection in 2023/24. Bringing those officers holding suitable qualifications to competency will assist in service delivery but will still be insufficient to deliver the frequencies laid down in the statutory Food Law Code of Practice.

The Framework Agreement states that an estimate of the resource required to deliver the food service in accordance with the frequencies laid down in the current Food Law Code of Practice should be provided in the Food Service Plan; for food standards based on due/overdue/unrated inspections (due to the unprecedented times created by the pandemic and historic under resourcing), this would be estimated to be in the region of 6 additional staff (solely for food standards) in the short term by end of 2024. The longer-term impact and estimated resources are currently unclear due to the imminent changes to the code of practice in respect of food standards.

4.2.2 Environmental Health

Number of FTE involved in Food Hygiene, Communicable Disease and Public Health:	8.285
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Officer	FTE	Qualifications
Professional Lead	0.125	EHO/EHORB Registered
PEHO	0.8	EHO/EHORB Registered
SEHO x 2	1.6	EHO/EHORB Registered
EHO x 10	5.76	EHO/EHORB Registered

In addition to these professional qualifications all officers are trained in HACCP and the auditing of HACCP and some officers have the lead auditor qualification.

With regards to the analysis of the resource currently available, against the resource required to deliver the Food Hygiene service in full, Powys County Council will be unable to fully comply with the Food Law CoP, as outlined in the performance indicators documented in paragraphs 3.1.6 and 3.1.16 above, and in summary,

Percentage of Food Hygiene Inspections/ Interventions carried out in accordance with Food Law Code of Practice Requirements.	Statutory Requirement 100% Local Target 32%
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Therefore, the team will deliver on a risk basis, as outlined targeting due category A-B premises, and overdue/due category C premises. New Food Business Registrations will also be prioritised to ensure they are inspected and given the appropriate FHRs score. Requested FHRs re-rate inspections will also be undertaken within the statutory timeframe of 3 months.

It is expected Powys will fall far below the statutory requirement with regards to overdue/due Category D and E premises, with the anticipated inspection rates of 8% and 4% respectively, as shown below:

Percentage of 'category D risk' Food Hygiene Inspections/ Interventions carried out in accordance with Food Law Code of Practice Requirements.	Statutory Requirement 100% Local Target 8%
Percentage of 'category E risk' Food Hygiene Inspections/ Interventions carried out in accordance with Food Law Code of Practice Requirements.	Statutory Requirement 100% Local Target 4%

The Framework Agreement states that an estimate of the resource required to deliver the food service in accordance with the frequencies laid down in the current Food Law Code of Practice should be provided in the Food Service Plan. For Food Hygiene, this is estimated to be in the region of 9 additional FTE EHOs in the short term to clear the backlog of inspections by 31st March 2024. The longer-term impact and estimated resources would be reduced, depending on the subsequent inspection categories awarded and the future required inspection frequencies, as set out in the FLCoP.

4.3 STAFF DEVELOPMENT PLAN

4.3.1 All staff are encouraged and supported in the attainment of formal qualifications. Staff currently active in food law enforcement, complete a competency training programme annually, in accordance with the Food Law Code of Practice and Practice Guidance.

4.3.2 Ongoing training requirements are identified in both Trading Standards and Environmental Health's, PCCs staff annual appraisals and review system, and Team Meetings. Staff apply to attend training events in order to consolidate or update their knowledge. Whenever practicable, they feedback to their peers on their newfound knowledge. Additional internal training courses are also arranged where appropriate to ensure that officers attain the 20 hours continuous professional development stipulated in the Food Law Code of Practice (para. 4.2.7).

4.3.3 Training identified at present for Food Hygiene and Standards staff in 2023/24:

Course/training	Organised By
Various subject matters	FSA/ CIEH/ TSW/ WG/ PHW/ External Organisations
Online training.	ABC Training
Consistency training	FSA/In-house
PACE / RIPA/ Prosecution manual	External/In house

5. QUALITY ASSESSMENT

5.1 MONITORING ARRANGEMENTS

The Authority supports the system of local authority audits organised by DPPW in Wales. The Food Standards Agency have carried out multiple audits of the Authority and copies of reports are published on the Food Standards Agency website.

5.1.1 Trading Standards

Monitoring of progress towards targets occurs during Quarterly Portfolio Performance Reviews, Appraisals, Team and Management Meetings; where Key Management Statistics are reviewed.

This ensures uniformity in standards of intervention, consistency training is undertaken on a regular basis; a system of monitoring is in place, which includes the following:

- The standing agenda item of “Consistency” at meetings of the Team to ensure consistency of approach in the completion of the Food Standards Intervention forms produced by the FSA & TSW Food Standards and Labelling Group (these are currently under review).
- Internal audits by the Principal Trading Standards/Senior Trading Standards Officers of a random sample by officer, of completed food standards intervention documentation to assess data collection and standards.
- ‘Shadowing’ of a random sample by officer, of interventions carried out each year. The inspecting officer will be accompanied by the Senior Trading Standards Officer to evaluate consistency in respect of procedures and standards.

5.1.2 Environmental Health

The service is also committed to improving its services and following best practice standards wherever possible.

To ensure uniformity of standards consistency training exercises are carried out at least annually and a system of monitoring is in place, which includes the following:

- regular meetings of the team to ensure consistency of approach throughout the County.
- in-house audits of a random sample of files, inspection documents etc.
- a random number of inspections carried out each year when the inspecting officer will be accompanied by another experienced officer, to evaluate procedures and standards.
- The service will participate in the annual FSA FHRS consistency training event.
- Quarterly Portfolio Performance Reviews.

6. REVIEW

6.1 REVIEW AGAINST THE SERVICE PLAN

6.1.1 Trading Standards and Environmental Health

The plan is used as a means of reviewing performance and any variance in meeting the previous year's plan is addressed within the current years plan. Performance is also measured via quarterly monitoring of key performance indicators, and these are reported on and tracked throughout the year. Areas of variation from set targets are identified and reasons explored for such variations. An improvement plan is produced if necessary.

Annual returns to the FSA under the monitoring arrangements are scrutinised by the lead officers prior to being submitted.

6.1.2 Each year a 4Ps (Planning, Property and Public Protection) Intergrated Business Plan is produced. This plan links to the work of the Food Service Teams and to the various corporate plans and business plans. It specifically indicates the surveys planned, along with how the service will be delivered to meet national and local priorities.

6.1.3 The headline actions for the Food Service in 2022/23 were:

- To maintain the percentage of food establishments which are broadly compliant with food law.
- Carry out proactive; risk-based programme of inspections in accordance with the FSA Recovery Programme and the Food Law Code of Practice.
- Participate in the National Food Hygiene (mandatory) Ratings Scheme, to provide informed consumer choice and drive-up food safety in food businesses
- Respond to notifiable infectious diseases as reported.
- Continue to monitor the safety standards of food and feed products manufactured, imported and supplied within the Authority, with particular emphasis on food fraud, chemical contamination, allergens, GM and pesticides
- Work with businesses to promote awareness within the catering sectors of allergen and nutritional information.

6.1.4 The 2023/24 Food Service will monitor the performance indicators as documented in paragraph 3.1.6 above.

6.1.5 The Trading Standards team achieved 100% for high-risk inspections in 2022/23 (this figure includes Food Standards/Feed Hygiene/Animal Health and Petroleum). Since 2022/23 a new Food Standards PI was introduced to achieve 100% of High (A) rated inspections.

6.1.6 The percentage of overdue/due high-risk inspections which were undertaken during the year 2022/23 by the Environmental Health team was 54.82%, which was a great achievement with the pandemic backlog and the staff resource available. However, the statutory requirements for minimum inspection frequencies in the FLCoP were

not met (54.82%) and neither were the inspection exemption requirements set out in the Food Standards Agency 2022/23 Recovery Programme (85.05% achieved). With 83 Category C and 306 Category D inspections remaining outstanding for inspection on 31/03/23.

% of High-Risk Inspections Undertaken		
Year	Trading Standards Food Standards%	Environmental Health Food Hygiene %
2018/19	98.11	100
2019/20	100	97.73
2020/21	98.11	4.98
2021/22	100	49.57
2022/23	100 (only food standards)	54.82

6.1.7 The percentage of Broadly Compliant Food Businesses in Powys in 2022/23 was 92.9% for Trading Standards and 97.49% for Environmental Health.

% of Broadly Compliant Food Businesses		
Year	Trading Standards Food Standards%	Environmental Health Food Hygiene %
2018/19	98.11	95.30
2019/20	100	96.81
2020/21	98.11	97.13
2021/22	100	97.87
2022/23	92.9	97.49

6.1.8 The percentage of new businesses identified during the year which were open, trading and subject to an inspection.

In 2022/23 the Food Standards PI for New Businesses inspected was amended to 95% (from 55%) to reflect the Environmental Health Teams, Food Hygiene's PI of 95%. Under the FLCoP newly registered food businesses should be inspected within 28 days of commencement of trading/ taking over the business. Therefore, the statutory requirement is 100%.

% of New Businesses subject to an inspection		
Year	Trading Standards Food Standards %	Environmental Health Food Hygiene %
2018/19	52.3	100
2019/20	34	96.18
2020/21	0 (covid)	18.45
2021/22	14.5	100
2022/23	63.2 (food only)	100

6.2 VARIATION FROM THE PREVIOUS YEAR'S SERVICE PLAN

6.2.1 Environmental Health

As stated in paragraph 6.1.6 above, the percentage of 'overdue/due high-risk inspections' (A-Ds) which were undertaken during 2022/23 by the team was

54.82%, which was a great achievement with the pandemic backlog and the staff resource available. But fully aware, achievement was not near the statutory requirement of 100%.

The chart below summarises some of the activities the small team of officers undertake on an annual basis with regards to their food hygiene and communicable disease roles. Please note, the activities listed are not comprehensive, with Export Certification, Voluntary Surrender of Foods, Notices Served, Approvals granted, FHRS Appeals determined, Zoonotic (TB/Salmonella) notifications etc. not included.

Activity	2018/19 Achieved	2019/20 Achieved	2020/21 Achieved	2021/22 Achieved	2022/23 Achieved	2023/24 Planned/ Estimate
A Rated Inspections	32	29	6	22	20	28 (14 x 2)
B Rated Inspections	99	98	8	59	59	55
C Rated Inspections	544	539	33	359	452	672
D Rated Inspections	188	215	4	24	46	43 (8% of 537)
E rated Inspections	152	75	2	27	26	51 (4% of 1283)
Requests for FHRS re-rate inspections	82	94	3	41	49	65
New Food Registered Businesses	304	348	273	300	311	300
Revisits	223	195	5	111	139	150
Food Complaints	119	93	72	93	83	90
Requests for Advice	690	623	344	473	748	800
Food Samples	350	340	0	45	83	400+
Infectious Disease Investigations	270	225	153	266	250	250
Total Interventions	3,053	2,874	903	1,820	2,266	2,504

The EHOs have achieved particularly well against the target in relation to New Food Registrations with initial contact via. email and telephone, and the subsequent unannounced FHRS inspections with 100% achieved. The initial contact and timely inspections are seen as a vital element of the service, with not only assisting with business set up, but also ensuring members of the public are not placed at unnecessary risk by the activities being undertaken.

6.2.2 Trading Standards

The last year for which a Food Service Plan was produced was 2019/2020, the Trading Standards service achieved some of its key targets in respect of official controls, interventions and inspections. The figures achieved for 2022/23 are given below.

Activity	2018/19 Achieved	2019/20 Achieved	2020/21 Achieved	2021/22 Achieved	2022/23 Achieved	2023/24 Planned
A Rated Inspections	20	20	15	20	21	21
B Rated Inspections	192	132	1	106	194	275
C Rated Inspections	42	30	3	15	62	49
Revisits	77	40	2	5	10	10
Food Complaints	46	22	5	31	34	30
Complaint Samples	0	0	1	0	0	3
Requests for Advice	39	96	5	28	10	20
Food Samples	67	58	0	55	53	67
New Businesses	158 (52.3%)	105 (34%)	0	40 (14.5%)	139 (63.2%)	245 (95%)
Total Interventions	626	503	32	300	523	720

Figures for 2020/21 – impacted due to covid pandemic – staff redeployed to covid.
Figures for 2021/22 – impacted by covid pandemic – partial restrictions throughout this period.

The reduction in B rated premises achieved in 2019/20 is due to the redundancy of 2 qualified food officers.

The figures for 2021/22 have also been affected by covid premises closure and restrictions, however it should be noted that 100% of A rated premises was achieved.

- Our performance was fed back quarterly through the Quarterly Portfolio Performance Reviews.

6.3 AREAS FOR IMPROVEMENT

- 6.3.1 The Food Service has been audited by the Food Standards Agency and on these occasions has responded positively to the areas for improvement identified.
- 6.3.2 Due to resource pressures encountered from the backlog of work caused by the Covid-19 pandemic, we will have to adapt the way that food interventions are carried out in the future.
- 6.3.3 The departments policies and procedures were planned to be reviewed and updated in 2020/21, however due to the teams being at the forefront of the Covid-19 pandemic, this work was not undertaken and remains outstanding.
- 6.3.4 We will continue to develop our content on the Council's website and through Facebook and Twitter to improve the provision of information to the public and businesses as well as developments with the ability to email our food business operators with current information.
- 6.3.5 Interventions with our Category E food hygiene premises continue to cause concern with the lack of resource to comply with the FLCoP and to the satisfaction of the FSA. In 23/24 it is not envisaged with the resource available to make any indent to this backlog, as the team are concentrating their resource on higher risk premises. We will consider work to refine the way we handle these premises and await the outcome of Assuring Business Compliance review being undertaken by the FSA, which will shape the way we work with these businesses in the future. We are anticipating the introduction of a new statutory Food Law Code of Practice, currently scheduled for April 2024, which may fundamentally affect food service delivery.
- 6.3.6 We will continue to take part in sampling surveys both nationally, regionally and locally with relevant partners to achieve common goals in standards, health and nutrition, as well as looking for increased value for money for the services we operate.
- 6.3.7 Partnership working with the FSA National Food Crime Unit and other LAs on food crime investigations to target criminals.
- 6.3.8 To continue to build and work collaboratively with internal and external stake holders.
- 6.3.9 Pilot authorities in Wales have recently been selected with respect of a proposed new Food Standards Delivery model, which is planned to be introduced from April 2024.
- 6.3.10 The July 2022 Trading Standards restructure provided the opportunity to upskill staff who had not delivered food standards or who's competency had lapsed, this will provide us with some resilience in the long term.
- 6.3.11 The current Northgate (M3) database system contract Public Protection utilises will cease on 31st March 2024. A new system is therefore required imminently, and tender and procurement of a new system 'Brunswick Project' is underway, which will refine processes and the use of new technological advancements - ensuring smarter working solutions.

- 6.3.12 The teams will continue to keep abreast of the extra regulatory duties and expectations, which are placed on the EH and TS Officers, such as new and proposed regulations relating to food allergens, healthy food environments, food waste, holiday accommodation. As the Teams will be responsible for enforcing the requirements of these provisions.
- 6.3.13 It would be prudent to ensure future proofing of the service as the workforce is of an aging population, traditionally, relying on a resource that was almost 'home grown', as many student EH/TSOs undertook a paid 48-week (minimum) placement in their home authority, and once qualified often secured permanent positions (many of the EH/TSOs still employed by Powys are those who came through this route). Each year LAs hosted at least one student, but as budget pressures prevailed in the early twenties the first positions axed from structures were funded student placements. Until late Summer 2021, Powys County Council had not funded a student placement in over a decade. But through Covid-19 Pandemic work which the team have been an integral part of, temporary funding was secured through WG Test Trace & Protect (TTP) and utilised to give two Powys resident undergraduate MSc Environmental Health students paid placements. It is recommended that funding is provided to continue such support by providing both undergraduate EH and TS Officer's paid placements.
- 6.3.14 The Report of the Welsh Health Protection System Review, published February 2023 states '*local environmental health expertise needs to be retained and strengthened, given the expanding range of environmental concerns.*' And in the recommendation's states 'Local resilience for all-hazard health protection needs to be retained following recovery from the Covid pandemic.'

Appendix A

Performance Measures up until 2022/23

Description	Performance 2019/20		Performance 2020/21		Performance 2021/22		Performance 2022/23	
	Target	Actual %	Target	Actual %	Target	Actual%	Target	Actual%
The percentage of high-risk businesses that were liable to a programmed inspection that were inspected for:								
Food Hygiene	100%	97.73	100%	4.98	100%	49.57	100%	54.82
Trading Standards (Food Standards)	100%	100	100%	98.11	100%	100	100%	100
The % of new businesses identified during the year which were subject to an inspection by:								
Food Hygiene	95%	96.18	95%	18.45	95%	100	95%	100
Trading Standards (Food Standards)	55%	34	55%	0	55%	14.5	95%	63.2
Percentage of Broadly Compliant Food Premises								
Food Hygiene	90%	96.81	90%	97.13	90%	97.87	90%	97.49
Trading Standards (Food Standards)	N/A	100	N/A	98.11	N/A	100	N/A	92.9

Trading Standards Budget 2023/2024

(it is not possible to separate the food standards budget from the overall activities budget)

Cost Centre	Cost Centre Name	Account	Account Name	Budget 2
533508	BUSINESS SUPP & CONSUMER FRAUD	EX113800	OTHER NJC (OFFICE) STAFF PAY	338,730
533508	BUSINESS SUPP & CONSUMER FRAUD	EX114700	STAT HOLIDAY SUPPLEMENT PAY	210
533508	BUSINESS SUPP & CONSUMER FRAUD	EX123800	OTHER NJC (OFFICE) STAFF NI	32,870
533508	BUSINESS SUPP & CONSUMER FRAUD	EX124700	STAT HOLIDAY SUPPLEMENT NI	20
533508	BUSINESS SUPP & CONSUMER FRAUD	EX133800	OTHER NJC (OFFICE) STAFF SUP	80,620
533508	BUSINESS SUPP & CONSUMER FRAUD	EX134700	STAT HOLIDAY SUPPLEMENT SUP	50
533508	BUSINESS SUPP & CONSUMER FRAUD	EX140500	PROFESSIONAL SUBSCRIPTIONS	2,500
533508	BUSINESS SUPP & CONSUMER FRAUD	EX160200	STAFF TRAVEL	6,360
533508	BUSINESS SUPP & CONSUMER FRAUD	EX160400	STAFF EXPENSES	820
533508	BUSINESS SUPP & CONSUMER FRAUD	EX160500	STAFF TRAINING	4,100
533508	BUSINESS SUPP & CONSUMER FRAUD	EX300200	STAFF LEASE CAR/VEHICLE LEASES	8,870
533508	BUSINESS SUPP & CONSUMER FRAUD	EX401200	BOOKS AND PUBLICATIONS	1,450
533508	BUSINESS SUPP & CONSUMER FRAUD	EX401300	GENERAL OFFICE EXPENSES	940
533508	BUSINESS SUPP & CONSUMER FRAUD	EX401500	CLOTHING	1,150
533508	BUSINESS SUPP & CONSUMER FRAUD	EX401900	EQUIPMENT PURCHASE	1,490
533508	BUSINESS SUPP & CONSUMER FRAUD	EX402500	ICT HARDWARE	80
533508	BUSINESS SUPP & CONSUMER FRAUD	EX403500	SUBSCRIPTIONS	6,920
533508	BUSINESS SUPP & CONSUMER FRAUD	EX403600	TELEPHONES - LANDLINE	2,600
533508	BUSINESS SUPP & CONSUMER FRAUD	EX403700	TELEPHONES - MOBILE	410
533508	BUSINESS SUPP & CONSUMER FRAUD	EX404000	OTHER SERVICES	37,540
533508	BUSINESS SUPP & CONSUMER FRAUD	IB111300	INT EXP PRINT AND POSTAGE	1,000
533508	BUSINESS SUPP & CONSUMER FRAUD	RE300100	COST RECOVERY	-1,000
533508	BUSINESS SUPP & CONSUMER FRAUD	RE301600	STAFF LEASE CARS	-5,790
533508	BUSINESS SUPP & CONSUMER FRAUD	RE402000	LICENCES	-6,000
533508	BUSINESS SUPP & CONSUMER FRAUD	RE406300	OTHER SALES	-5,000
			Total TS Business Supp & Consumer Fraud	510,940

Environmental Health - Food Hygiene and Infectious Disease Control Budget 2023-24

Cost Centre	Cost Centre Name	Account	Account Name	Budget 2
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX113800	OTHER NJC (OFFICE) STAFF PAY	437,840
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX114700	STAT HOLIDAY SUPPLEMENT PAY	1,050
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX123800	OTHER NJC (OFFICE) STAFF NI	41,310
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX124700	STAT HOLIDAY SUPPLEMENT NI	90
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX133800	OTHER NJC (OFFICE) STAFF SUP	104,350
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX134700	STAT HOLIDAY SUPPLEMENT SUP	280
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX140500	PROFESSIONAL SUBSCRIPTIONS	1,360
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX160200	STAFF TRAVEL	10,600
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX160400	STAFF EXPENSES	140
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX401300	GENERAL OFFICE EXPENSES	730
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX401400	CATERING SUPPLIES	50
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX401500	CLOTHING	200
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX401900	EQUIPMENT PURCHASE	1,110
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX403600	TELEPHONES - LANDLINE	2,370
533422	FOOD HYGIENE, INFECTIOUS DIS.	EX404000	OTHER SERVICES	6,540
533422	FOOD HYGIENE, INFECTIOUS DIS.	IB110100	OTHER INTERNAL EXP	500
533422	FOOD HYGIENE, INFECTIOUS DIS.	RE300100	COST RECOVERY	-3,050
533422	FOOD HYGIENE, INFECTIOUS DIS.	RE406300	OTHER SALES	-31,860
533422	FOOD HYGIENE, INFECTIOUS DIS.	RE500600	BUDGET REDUCTIONS TO BE FOUND	-62,270
			Total Food Hygiene, Infectious Disease	511,340

Trading Standards, Food Standards Sampling 2023-24 (Budget £10,000)

Month	Sample
June	4 x Wine for alcoholic strength and allergens (Sulphites). 6 x Meat products for meat content.
July	4 x Ice Cream for fat content.
August	6 x Fruit and vegetables for pesticides levels. 4 x Eggs for chemical contamination (Dioxins/PCBs).
September	4 x Bottled water for claims concerning vitamins. 5 x Meat products for meat content.
October	6 x Beers for alcoholic strength and allergens (Sulphur dioxide).
November	6 x Fish for speciation (substitution of species of fish).
December	6 x Pilau rice for banned colours. 6 x Takeaway meals for banned colours and for peanut allergen testing in sauces.
January	6 x Various food items for PPDS (pre-packed for direct sale) labelling compliance checks.
February	4 x Food supplements for labelling compliance checks against the regulations and claims.
March	Residual samples/items that need to be re-sampled due to previous failures budget dependant.
Total Samples to be taken.	67

Environmental Health Food Sampling Plan 2023-24

Budget allocated within Public Health Wales, Microbiological Services is £12,272

EHOs within Powys will be participating in the following sampling surveys over the forthcoming year, with an estimated 400+ samples taken for analysis:

1. **Approved Premises/Manufacturers** - samples from Powys approved premises/manufacturers will be submitted for surveillance.
2. **Imported Food** - Imported Ready-to-Eat Foods obtained, while officer's carrying out routine inspections during the year.
3. **Potable Water from Mobile Premises** (& associated standpipes if present) – the team will undertake sampling of potable water supplies from wash hand basins, food and equipment sinks, including other portable water facilities, i.e., containers, mobile Teal units etc. used by mobile Food Business Operators (FBOs) during their food undertakings.
4. **Welsh Food Microbiological Forum (WFMF) 2023/24 Surveys** - Powys will be participating in two very targeted surveys set by WFMF including:
 - **Cheese survey** - Samples to be collected from producers or retail premises and includes all types of cheeses (including pre-packed cheeses).
 - **Ready to Eat (RtE) Salad survey** - Samples of RtE salads prepared on-site at retail or catering premises (takeaways, pubs, restaurants, salad bars, coffee shops, delicatessens and sandwich shops etc.), but not bought in ready prepared, and must also be Ready-to-Eat with no further preparation required.
5. **Ice from Commercial Premises** – the team will be undertaking ice (used in drinks etc.) sampling from commercial food premises during the year.
6. **High Risk Ready to Eat Foods from Caterers (WFMF) 2023/24 survey** – the authority may be undertaking target samples of high risk RTE (hot and cold) foods of all types from catering premises during the year.

We will continue to sample according to parameters set out by the PHW Laboratory Service.

