



National Enforcement Priorities Safeguarding Public and Animal Health 2019-2020 and the National Targeted Monitoring Strategy (England)

Feed law enforcement (at all stages of production, processing, storage, transportation and distribution, including import/export and the primary production of feed)

Food hygiene law enforcement at the level of primary production

Author: Julie Benson

Regulatory Compliance Division

Email: julie.benson@food.gov.uk

Mobile: 07500951312

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Introduction

The UK feed and food export industry, worth [£22 billion](#) currently, accounts for 60% of exports and it is imperative that future official controls delivered provides assurance to the UK's trading partners. Like any major industry, it is vulnerable to a wide range of criminal activity.

This document sets out the Food Standards Agency's (FSA):

- National Enforcement Priorities, for England, in respect of animal feed and food hygiene at the level of primary production
- expectations of local authorities (LAs) to implement, where relevant, these priorities as part of their annual intervention programme
- National Targeted Monitoring Strategy (NTMS), for England

The priorities:

- have been informed by the Strategic Animal Feed Threat Assessment 2019 (AFTA 2019)
- have been developed in consultation with feed industry and LA representatives; National Trading Standards ([NTS](#)); the National Agriculture Panel (NAP) and National Animal Feed at Ports Panel (NAFPP) members
- support our Animal Feed Strategy mission to safeguard public and animal health by driving up sustained improvements in compliance, through intelligence led enforcement

The objectives of the priorities are to:

- drive an intelligence led approach to official controls, focusing resources on higher risk and non-compliant business, placing an increased focus on outcomes
- maintain a level playing field for honest and diligent food and feed businesses, which is in the interests of industry as a whole
- reduce unnecessary burdens on business by focusing LA activity on agreed areas of greatest threat to public and animal health
- create a flexible and intelligence-led approach to interventions, placing an increased focus on outcomes
- realise our strategic goal of '[Food We Can Trust](#)' and drive up the quality and consistency of official controls

Feed business operators have a legal obligation to comply with feed law and we call on the feed industry, and in particular FSA approved assurance schemes, to proactively promote the importance of driving up compliance in the identified risk areas.

These priorities will be reviewed on a six-monthly basis in light of any emerging issues or other intelligence received by us regarding risks to human, animal health and welfare or the environment.

National Enforcement Priorities for 2019/20¹

Animal Feed National Priorities



Food Hygiene Primary Production National Priorities



¹ The priorities are not listed in any particular order

Animal Feed National Priorities

Priority 1: Effective information sharing, communication and exchange of intelligence to support official feed control delivery

Our strategic [plan](#) refers to the 'importance of continuing to develop and apply a robust evidence base' in our work and a commitment to 'gather and use evidence to identify and understand the biggest risks and challenges'. Gathering and exchange of information, data and intelligence between Competent Authorities, central government departments and industry is a key element to an effective risk-based system of official feed controls.

LAs are expected to give priority to ensuring effective information sharing, communication and exchange of intelligence to support official feed control delivery by:

- a) proactively use the recognised trading standards national intelligence databases ([IDB](#) and Memex) to record intelligence, share with, and report to, the National Food Crime Unit ([NFCU](#)) all intelligence they become aware of in relation to known or suspected cases of food and/or feed fraud, including historic cases
- b) liaising, as appropriate, with inland authorities and proactively sharing information and intelligence in accordance with ACTSO guidance on [inland referrals](#). Referrals
- c) acknowledging and responding, in a timely manner, to authorities, when matters are referred inland, to confirm action taken, providing as much supporting information as possible
- d) liaising with the LA responsible for the nearest large point of entry for feed, or other appropriate point of contact, to use their expertise and co-operation to assist in implementing a proportionate system of official controls
- e) proactively implementing the feed hygiene [MoU](#) between the Veterinary Medicines Agency ([VMD](#)) and the Animal Plant and Health Agency ([APHA](#)), which supports an intelligence led, risk-based approach to enforcement, prevents duplication of work and aids effective use of resources
- f) ensuring regular liaison with LAs in their area responsible for keeping registers of food business establishments (FBOs) under Article 6(2) of Regulation (EC) No 852/2004 on food hygiene

Priority 2: Validation of effective feed safety management systems at businesses supplying former foodstuffs or co-products

Every year in the UK, around [660,000 tonnes of former foodstuffs are processed as animal feed, worth £110 million](#). Within the UK, the Waste and Resources Action Programme ([WRAP](#)), is continuing to encourage businesses in the food supply chain to sign up to the [Courtauld agreement](#). The agreement aims to improve resource efficiency and reduce the carbon impact of the UK grocery sector, involving manufacturers and retailers reducing food waste by encouraging and developing its use as animal feed.

LAs are expected to give priority to the validation of effective feed safety management systems at businesses supplying former foodstuffs or co-products by ensuring interventions include the examination of documented feed safety management systems (HACCP plans where they are used)².

This should include a focus on the following:

- a) the identification of control points to ensure that material is suitable for use as animal feed and does not include items such as meat, fish and shellfish (and products containing them or have been in contact with)
- b) appropriate segregation being in place with material not intended for use as feed
- c) the existence of a recorded training programme for staff in charge of dealing with former foodstuffs
- d) material being supplied is to a registered feed business establishment
- e) where the material is a former foodstuff containing [packaging](#) intended for use in feed, the material is to undergo further treatment at a feed business which specialises in the removal of packaging of foodstuffs
- f) in the case of processors of former foodstuffs into feed that their suppliers and hauliers are all registered as feed businesses

² Recognising that where a business has a [primary authority](#) relationship validation of compliance should be in respect of agreed centralised systems

Priority 3: Validation of effective implementation and maintenance of permanent written procedures based on HACCP principles

LAs are expected to give priority to validating appropriate implementation and maintenance of permanent written procedures based on HACCP principles by ensuring FeBOs understand legal requirements, are implementing and maintaining and reviewing, as appropriate, their feed safety management systems, having regard to the nature, size and scale of business³.

This should include a focus on the following:

- a) examination of written feed safety management systems
- b) identification of hazards ensuring all steps in the process have been considered and any grouping of steps (e.g. consideration of individual ingredients) is appropriate and not done in such a way that hazards are overlooked or applied incorrectly
- c) that Critical Control Points are correctly identified, properly defined and controlled. Where hazards within the CCP are already adequately controlled by a pre-requisite procedure, the necessity for a critical control point should be raised with the FeBO
- d) establishing that appropriate systems are in place to minimise cross-contamination between batches of feed (particularly in respect of those containing coccidiostats, veterinary medicines or [additives](#) with maximum permitted levels for particular target species, in accordance with our National Sampling [Protocol for coccidiostats](#), [regional reporting template](#) and [guidance](#))
- e) appropriate sampling programmes at the feed business are in place to verify compliance with maximum permitted levels of undesirable substances in feed materials and additives. Checks should include an examination of results of analysis and consideration of whether appropriate action has been taken
- f) scrutinising traceability systems to ensure that products not intended for feed use are not diverted into the feed/food chain

³ Recognising that where a business has a [primary authority](#) relationship validation of compliance should be in respect of agreed centralised systems

Priority 4: Verification of the accuracy of feed labelling particulars

Information on feed labels is essential to enable FeBOs, throughout the feed chain, to make appropriate use of material they use to manufacture feed or use as feed. The presence and accuracy of:

- labelling information is critical in ensuring feed is provided to the correct species, age of animal and in quantities that would not adversely affect human and/or animal health or impact on traceability
- batch codes aids prompt recall and withdrawal of affected products in the event of a feed safety incident

LAs are expected to give priority to:

- a) verifying the accuracy of claims as set out in Article 13 of [Regulation \(EC\) No 767/2009 on the placing on the market and use of feed](#)
- b) ensuring labelling and presentation of feed does not mislead the user, particularly in respect of the country of origin, quality and method of manufacture or production e.g. organic and non-GM⁴
- c) additives present in feed are [authorised](#) in line with [Regulation \(EC\) No 1831/2003 on additives for use in animal nutrition](#)

Priority 5: Effective monitoring of consignments of feed originating from 3rd Countries, at points of entry

Imported feed makes up 40% of feed used in the UK annually. Sampling imported feed is a key mechanism to ensure the safety and quality of feed and food entering the UK.

To support a consistent and risk-based approach to monitoring 3rd country imports LAs are expected to give priority to monitoring consignments of feed originating from 3rd Countries, in consideration of:

- a) ACTSO [guidance](#) on consistency and prioritisation of the delivery of official controls at points of entry
- b) sampling consignments which have not been sampled recently or have not been seen before at the point of entry or where there is reason to believe they might fail to comply with legal requirements

⁴ Genetically Modified

Food Hygiene Primary Production National Priorities

Priority 6: Effective identification of higher-risk, ready-to-eat food businesses operating at the level of primary production

The identification of higher-risk, ready-to-eat food businesses, operating at the level of primary production, will assist in the future delivery of a more targeted, prioritised food hygiene inspection programme to achieve greater efficiencies and public health protection, whilst limiting inspection burdens on businesses.

LAs are expected to give priority to the identification of higher-risk, ready-to-eat food businesses' operating at the level of primary production. For 2019/20 these are producers of micro leaves, baby leaves, herbs, watercress, lettuce, spinach, strawberries, salad onions, radishes, celery, and chicory.

Priority 7: Verification and validation of effective systems and controls at higher-risk, ready-to-eat food businesses establishments operating at the level of primary production

One of the recommendations from a European Commission [audit](#) of the UK, which evaluated the system of official controls relating to microbial safety of primary products of non-animal origin (FNAO), was that controls must adequately take into account identified risks to food safety, in light of EFSA [opinions](#) on the microbiological hazards presented in ready to eat foods.

LAs are expected to give priority to the verification and validation of effective systems and controls at higher-risk, ready-to-eat food businesses establishments operating at the level of primary production. With a particular focus on:

- a) confirming the water source is potable or clean, wherever necessary, to prevent contamination.
- b) verifying there are records in place, and maintained, relating to control hazards in an appropriate manner, in particular any use of plant protection products and biocides, occurrence of pests and disease and the results of any relevant analyses carried out on samples that have importance to human health
- c) ensuring staff handling foodstuffs are in good health and undergo training on health risks
- d) ensuring, as far as possible, appropriate measures are in place to prevent animals and pests from causing contamination

National Targeted Monitoring Strategy (NTMS) for Animal Feed and Food Hygiene at Primary Production

The NTMS approach for 2019/20 has been informed by:

- a) the findings of the AFTA 2019, in respect of feed business establishments
- b) the level of current compliance of the food or feed business establishment
- c) whether the food or feed the establishment benefits from Type 1 or Type 2 Earned Recognition

Table 1: NTMS Intervention Type and Frequency

Feed business establishment type	Level of Current Compliance		
	Satisfactory Not a member of an FSA Approved assurance scheme	Broad compliance Not a member of an FSA Approved assurance scheme	At least satisfactory compliance A member of an FSA Approved assurance scheme
Frequency and type of intervention			
R13	0.75% Inspection or audit	0.5% Inspection or audit	0.25% Inspection or audit
R14	0.75% Inspection or audit	0.5% Inspection or audit	0.25% Inspection or audit

LAs are expected to:

- a) examine any former foodstuffs/co-products being used for feed to ensure it is:
 - not contaminated
 - does not contain prohibited substances⁵
 - being sourced from a registered feed business establishment
- b) check compliance with the record keeping requirements detailed in Annexes I and II of Regulation (EC) 1831/2003 laying down requirements for feed hygiene, as applicable to the establishment

⁵ Annex III of Regulation (EC) No 767/2009 on the placing on the market and use of feed

Guidance

ACTSO National Inspection Co-producer [guidance](#)

ACTSO national co-producer inspection [form](#) and data collection [form](#) (non-conformances identified during interventions)

Community [guides](#) to good practice were developed in accordance with Article 22 of [Regulation \(EC\) No 1831/2003](#) laying down requirements for feed hygiene

[Codex Alimentarius Standards](#) relevant to feed

[PAS 222:2011](#) Prerequisite programmes for food safety in the manufacture of food and feed for animals

FSA guidance on [HACCP-related requirements of the Feed Hygiene Regulation for farmers](#)

European Feed Manufacturers (EMFC) [guide](#) published by the European Feed Manufacturers' Federation (FEFAC) on good practices for the industrial manufacturing of compound feed and premixtures for food producing animals

EU Codes of Good Practice on [food producing animal](#) and [pet food](#) labelling and [FSA guidance](#)

EU community [guide](#) to good practice for feed additive and premixture operators

EU [guide](#) to good practice for the industrial manufacture of safe feed materials

EU [guide](#) to good hygiene practices for the collection, storage, trading and transport of cereals, oilseeds, protein crops, other plant products and products derived thereof

Defra [Code of Practice](#) for the control of salmonella during the production, storage and transport of compound feeds, premixtures, feed materials and feed additives

EU [Guide](#) on the manufacturing of safe feed materials from starch processing

EU [Guide](#) on the manufacturing of safe feed materials from oilseed crushing and vegetable oil refining

EU [Guide](#) on the manufacturing of safe feed materials from biodiesel processing

[Salmonella auditor checklist](#)

[Salmonella factsheet](#)

FSA [guidance](#) on the presence of food grade packaging material in feed in September 2013

[Guidance](#) on former foodstuffs eligible for feeding

[Advisory Committee on Animal Feeding Stuffs](#) review of on-farm feeding practices - updated [recommendations](#) on identifying hazards and minimising risks

Industry [Code of Practice](#) for on-farm feeding, which applies to farmers and covers all aspects of on-farm feeding, including on-farm mixing

[Good Practices for the feed industry](#) – implementing the Codex Alimentarius Code of Practice on good animal feeding

Industry Standards

- Red Tractor Assurance [Scheme Standards](#)
- AIC Feed Material Assurance Scheme Standards ([FEMAS](#));
- AIC Universal Feed Assurance Scheme ([UFAS](#));
- AIC Trade Assurance Scheme for Combinable Crops ([TASCC](#)); and
- [BRC Voluntary Module 9](#) – Management of Food Materials for Animal Feed.

Imported Feed

ACTSO [guidance](#) on sharing information and intelligence to support delivery of imported feed controls

ACTSO [guidance](#) on sharing information and intelligence to support delivery of imported feed controls

A list of DPEs and DPs applicable to imports of animal feed can be found on our [website](#)

Food Hygiene Primary Production Guidance

Private Water Supply [Guidance](#)

EU and National [Guides](#) to Good Hygiene Practice

Primary Production Food Hygiene – Enforcement [Guidance](#) for Fresh Fruit and Vegetable Production

Primary Production – Food Hygiene Compliance Score Guidance

Commission [guidance](#) document on addressing microbiological risks in fresh fruit and vegetables at primary production through good hygiene

EU [Register](#) of National Guides to Good Hygiene Practice.

[Guidelines](#) for Monitoring Microbiological Safety of Fresh Produce

[Guidance on record keeping requirements](#)

[Guide](#) to Primary Production Food and Feed Hygiene Inspections (Food Standards Scotland)

AHDB Horticulture [Fact Sheet](#) – Monitoring Microbial Food Safety of Fresh Produce

[Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry](#)