

DERBYSHIRE COUNTY COUNCIL

Meeting with Cabinet Member – Health and Communities

20 August 2013

Report of the Strategic Director Cultural and Community Services

ANNUAL FOOD AND FEED SERVICE PLAN 2013-14

1. Purpose of Report

To seek approval from the Cabinet Member, Health and Communities for the annual Food and Feed Service Plan 2013-14.

2. Information and Analysis

- 2.1 In accordance with the Food Standards Agency's (FSA) 'Framework Agreement on Official Feed and Food Controls by Local Authorities' (the Framework Agreement), the Trading Standards Division produces an Annual Service Plan for Food And Feed. The Plan sets out a proposed programme of activity to seek compliance with food and feed requirements for the forthcoming year. This forms part of the division's contribution to the departmental service plan currently being drafted to align divisional activities with legal requirements and council priorities.
- 2.2 The Framework Agreement was developed by the FSA in consultation with local authorities, the local government associations and professional bodies. It sets out what the Food Standards Agency expects from local authorities in their delivery of official controls on feed and food law. The Agreement sets out the planning and delivery requirements of feed and food official controls, based on the existing statutory Codes of Practice.
- 2.3 Details of the monitoring system for local authority feed and food law enforcement, and of the audit arrangements, are available on the FSA website and the Framework itself is available via the link below. The FSA has given notice to the authority of its intentions to carry out an audit of the controls in place to monitor feed hygiene and standards controls in September this year.

<http://www.food.gov.uk/multimedia/pdfs/enforcement/frameworkagreementno5.pdf>

- 2.4 There is a close link between the food we eat and our health. The local authority has a duty to enforce food safety legislation that is intended to ensure that food is safe to eat and that it complies with a wide range of

standards and labelling requirements. In general, district and borough council environmental health departments are responsible for enforcing food hygiene whereas the county council is responsible for ensuring that businesses trading in Derbyshire comply with food labelling and compositional standards requirements. Much of the legislation stems from Europe and local authorities work closely with the Food Standards Agency which is the central government department responsible for administering the legislation.

- 2.5 New controls have also been introduced to ensure that animal feed meets hygiene requirements to reduce the risk of contaminated feed. Europe wide legislation was brought into force in the 2000's following animal disease outbreaks such as foot and mouth and BSE. As trading standards staff were already responsible for the composition and labelling of fertilisers and feeding stuffs, responsibility for enforcing both feed hygiene and farm food hygiene was given to local authority trading standards services.
- 2.6 The Division also works closely with neighbouring trading standards authorities within the East Midlands and with district council Environmental Health colleagues. Increasingly the division is working closely with Public Health colleagues and will be participating in a joint initiative to raise public health via the 'responsibility deal'. In addition, the Division is leading an initiative with government colleagues from the Better Regulation Delivery Office to reduce regulatory burdens on businesses through the Better Business for All initiative. This project is working in conjunction with business representatives and the D2N2 local economic partnership to bring together 'regulators' and businesses to address real and perceived barriers to local businesses
- 2.7 The Trading Standards Service already provides advice and information to local businesses on the requirements of the law and how best to comply. Advice may be reactive – in response to a request from a local business or a referral from another authority – or proactive following a change in legislation or as a result of an inspection. To check compliance with food and feed standards and feed hygiene requirements, the service has a programme of inspections or visits to local businesses. The complexity and size of the business and the type of food or feed produced or sold will determine the frequency of visit in accordance with nationally agreed 'risk assessment' policies.
- 2.8 As well as 'routine' inspections or business advisory visits, the Division also undertakes project work to test compliance within a particular trade sector or food and feed products. Details of projects planned for this year are contained within the Food and Feed Service Plan and appendices.
- 2.9 In today's society the majority of food we buy is manufactured and pre-packed. To ensure that food is appropriately labelled and that it complies with food standards requirements, the Division also has a food sampling

programme. Food on sale in Derbyshire is sent for analysis by a food laboratory (Public Analyst) to examine the composition and compare it to the labelling. Breaches of food labelling and standards constitute an offence and depending on the severity of any non-compliance the Division will advise or consider enforcement action as appropriate. The majority of breaches are referred to the relevant 'Home Authority' – ie the trading standards department local to where the head office of the company is located. More serious breaches are investigated and, in a minority of cases, legal proceedings are instigated.

- 2.10 A similar approach will be adopted for ensuring that local producers and suppliers of animal feed comply with both composition and labelling (quality standards) and hygiene requirements. As previously reported to CabCo, the authority will be subject to a 2 day audit of feed controls in September by the FSA.
- 2.11 Decisions as to what enforcement action to take are made in accordance with the Division's compliance policy agreed by members which is referenced within the Food and Feed Service Plan.
- 2.12 The draft Plan is attached to the report as appendix 1 and it is proposed to publish it on the county council website when approved.

3 Financial Considerations

The cost of the food and feed sampling programme for 2013/14 is £50,000. The Division works closely with three Public Analyst services and agrees a programme for the year within this budget.

4 Other Considerations

In preparing this report the relevance of the following factors has been considered; human resources, legal, prevention of crime and disorder, equality of opportunity; environmental, health, human resources, property and transport considerations.

5 Background Papers

CabCo report Feed Hygiene dated 9th July 2013

6 Key Decision:

No

7 Call-in:

Is it required that call-in be waived for any decision on this report?

No

8 Strategic Director Recommendation

That the Cabinet Member, Health and Communities approves the Food and Feed Service Plan for 2013-14

Martin Molloy
Strategic Director
Cultural and Community Services

**Derbyshire County Council Cultural and
Community Department Trading Standards
Division**

Draft

**Food and Feed Service Plan
2013/2014**

Produced in accordance with the requirements of the
Food Standards Agency Framework Agreement

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Introduction

This Plan sets out how Derbyshire County Council through its Trading Standards Service delivers its food and feed service with the aim of ensuring that food standards and feed hygiene and standards are complied with.

The structure of this Food and Feed Service Plan follows the Service Plan guidance contained within Food Standards Agency's (FSA) Framework Agreement on Local Authority Feed and Food Controls by Local Authorities (as amended in July 2010)

<http://www.food.gov.uk/multimedia/pdfs/enforcement/frameworkagreementno5.pdf>

The other activities performed by Derbyshire Trading Standards Service in respect of consumer law enforcement form part of the Trading Standards Business Plan 2010-14 which is currently being amended.

This Service Plan describes the structure, policy and operational activities of Derbyshire Trading Standards Service (DTSS) in respect of food and feed law enforcement and advice.

The FSA has an audit role in respect of food and feed law enforcement and as such the Food and Feed Service Plan is intended to assist auditors to understand the authority's approach to seeking compliance with food and feed law requirements.

1 SERVICE AIMS AND OBJECTIVES

1.1 Aims and Objectives

The aims and objectives of DTSS can be found in the Cultural and Community Services Department Trading Standards Division Service Plan 2010-2014. The key performance indicators which link to the County Council's priorities are identified at Appendix A of this plan, which are currently being reviewed, and can be observed via the following link:

http://www.derbyshire.gov.uk/images/Service%20Plan%20-%20CCS%20-%20%20Trading%20Standards%20Division_tcm44-203420.pdf

Derbyshire Trading Standards Service's mission statement is **“improving life for local people by supporting business, helping consumers and tackling unfair and unsafe trading practices”**

1.2 Links to corporate objectives and plans

The County Council's Plan, can be viewed at

http://www.derbyshire.gov.uk/council/policies_plans/council_plan/default.asp

2 BACKGROUND

2.1 Profile of the Local Authority

The “new” Derbyshire County Council commenced on 01 April 1997, with Local Government reorganisation having maintained the original boundaries; but establishing Derby City as a separate Unitary Authority. The current administration took office in May 2013 following the local government elections.

The Trading Standards Service is based in Matlock which is also the home to the County Council's administrative centre.

Derbyshire has a population of 762,000 and has an area of around 1,000 square miles. It lies within the centre of England in the north west of the East Midlands region.

A county of strong contrasts, Derbyshire is largely rural and has a range of sparsely populated and larger urban areas. With no major urban centres, Derbyshire has 28 market towns which play a significant role in the local economy, both as employment hubs and as providers of valuable services to residents and out-lying rural areas. In the north east of the county, Chesterfield is the largest town.

The major cities of Derby, Manchester, Sheffield, Nottingham and Leicester lie in close proximity to Derbyshire's border. Derbyshire is easily accessible from surrounding areas, with more than 8.4 million people living within 18.6 miles of its boundary. The M1 runs through eastern Derbyshire and a direct rail link connects Derbyshire to London in just under two hours. Manchester, Birmingham, East Midlands and Doncaster airports are also nearby. Derbyshire is still heavily reliant upon manufacturing, which accounts for over a fifth of all employment in the county - twice the national rate. The economy of the north west of the county and the Peak District is based on traditional quarrying and agriculture, although hill

farming is becoming less central to the local economy. The development of tourism and new leisure activities is helping to supplement incomes and support farm diversification in these areas.

As part of the two-tier arrangement for local government within Derbyshire the County Council exists in parallel to eight District and Borough councils, who have responsibility for food hygiene enforcement as part of their Environmental Health functions.

2.2 Organisational Structure

The service was subject to a reorganisation in April 2012 which brought about changes to its structure.

Appendix 1 shows how the Trading Standards Service is incorporated into the structure of the Cultural and Community Services Department.

Appendix 2 shows the detailed structure of the Trading Standards Division as of 1 April 2012.

The Head of Trading Standards is responsible for all trading standards responsibilities including food and animal feed enforcement and reports directly to the Strategic Director for the Cultural and Community Services who in turn reports directly to the Chief Executive. As depicted in Appendix 2, the Trading Standards Service is broadly split into three service delivery areas. The Trading Standards Manager for Standards and Animal Health Team has responsibility for the day to day delivery of food and feed enforcement activity.

The Council makes its key decisions through a Cabinet of elected members underpinned by a scrutiny structure. Cultural and Community Services sits within the Health and Communities Portfolio and the Cabinet Member for Health and Communities – who is supported by two Deputy Cabinet Members – has delegated authority to approve the annual Food and Feed Service Plan. There is a three weekly cycle of ‘CabCo’ (Cabinet member and Chief Officer) committee meetings where papers are presented for approval or for information.

The appointed Public and Agricultural Analyst services for the services are

Public Analyst Scientific Services
i54 Business park
Valiant Way
Wolverhampton
WV9 5GB

Staffordshire County Council Scientific Services
14 Martin Street
Staffordshire
ST16 2LG

West Yorkshire Analytical Services
Nepshaw Lane South
Morley
Leeds
LS27 0UQ

2.3 Scope of the Feed and Food Service

The Service is responsible for ensuring that food standards, food hygiene at primary production (generally farms) and animal feed hygiene and standards are met.

This is achieved through:

- Inspection of food and feed businesses.
- Provision of food and feed advice to both businesses and consumers.
- Investigation of prioritised food and feed related complaints.
- Taking of food and feed samples for analysis.
- Prioritised participation in national, regional and local sampling, educational and project based activity.
- Approval and registration of feed businesses.
- Liaison with District and Borough Councils and regional and national colleagues, Government Department and other agencies.
- Responding to relevant food and feed alerts.

Although not a traditional role for a Trading Standards Service, Derbyshire Trading Standards continues to work with selected industry sectors to improve the nutritional content of locally produced food. It is also working with the Local Enterprise Partnership (D2N2), business representatives, district council environmental health colleagues and colleagues at the Better Regulatory Delivery Office (BRDO) to reduce burdens on local businesses through the 'Better Business for All' initiative. In addition, the Service is working with Public Health colleagues to promote the Government's 'Responsibility Deal' to improve health.

The service also has a responsibility for the enforcement of consumer safety, weights and measures, animal health and welfare and fair trading based legislation. In addition, the service administers the Derbyshire Trusted Trader Scheme – understood to be the largest local authority approved trader scheme in the country.

2.4 Demands on the Food and Feed Service

Staff and facilities are located at Chatsworth Hall, Matlock (an annex building of the main County Council complex). Initial advice and support for consumers is now provided by the national call centre Citizens Advice Consumer Service (CACS).

Last year the service received in the region of 18,000 enquiries from CACS, hence the need to priorities the allocation of resources. A decision on the allocation of recourses is taken using criteria which can be viewed at:

http://www.derbyshire.gov.uk/images/Enquiryprioritisation_tcm44-159818.pdf

Derbyshire Trading Standards Services 'consumer advice and enquires policy' can be viewed at:

http://www.derbyshire.gov.uk/images/Consumer%20advice%20and%20enquiries%20policy_tcm44-8254.pdf

A small number of complaints are received by telephone, email, letter and personal callers. The service also receives requests through its website:

http://www.derbyshire.gov.uk/business/trading_standards/default.asp

During 2012/13 240 of the enquiries (complaints and requests for advice) received were food standards related and 42 were feed related. It is expected that the numbers will remain broadly the same over the forthcoming year.

DTSS usually opens for personal callers between 9:00am and 5:00pm (Monday – Thursday) and 9:00am – 4:30pm on Fridays. The County Council's call centre is open between between 8am to 8pm Monday to Friday and 9.30am to 4pm Saturdays. 24 hour out of hour emergency contact with the service is available by calling 01629 533190.

The Service is ISO 9001: 2008 registered, the accreditation body being NQA. The issuing, control and review of policies, procedures, and advisory leaflets etc. is done using a software package named "Workbench".

DTSS has approximately 8,000 food premises and 4,800 feed and food hygiene premises. The service is responsible for food hygiene at 'primary producers' which are mainly farms and hence the majority of the feed premises are also food hygiene premises. The service's trader records are managed using a specialist software package Civica APP which is also referred to as FLARE.

In order to prioritise the appropriate frequency of interventions at the above premises, the service has adopted the Association of Chief Trading Standards Officers (ACTSO) Trading Standards risk rating scheme which was developed in consultation with the Food Standards Agency.

The scheme divides the premises into four separate risk bands which are detailed in **Appendix 3**. The table includes the required frequency of interventions and the number of food and feed premises the service has at each of the risk bands. The risk bands, amongst other things, take into account the products being manufactured, the distribution area, the size and complexity of the business and the turnover and the quality of the processes and management.

Two large national feed manufacturers are approved with the service under the provisions of the Feed (Hygiene and Enforcement) (England) Regulations 2005 and

EC Regulation 1831/2003, namely Frank Wright Trow Nutrition Ltd and DSM Nutritional Products Ltd. A summary of the service's registrations under the above regulations is included at **Appendix 4**.

2.5 Compliance Policy

The service's compliance policy is reviewed annually by senior management. This policy, along with details of completed prosecutions can be viewed at:

http://www.derbyshire.gov.uk/business/trading_standards/prosecutions/default.asp

The policy has been developed to provide a framework to ensure that the service operates in a manner that has regard to the five principles of good regulation, as provided by the *Legislative and Regulatory Reform Act 2006* and demonstrates a commitment to the requirements of the Regulators Compliance Code which is available at <http://www.bis.gov.uk/files/file45019.pdf>

DTSS believes that by following our compliance policy, we can protect consumers without imposing unnecessary burdens on legitimate businesses and thus help to promote a thriving local economy. The service recognises that most businesses want to comply with the law and we will endeavour to help businesses and others that do to meet their legal obligations without unnecessary expense.

The policy covers all aspects of Trading Standards enforcement and is intended to provide guidance for officers. It does not affect the discretion of the authority to take action in any case where it is deemed to be in the public interest to instigate legal proceedings. The policy also takes account of 'The Code for Crown Prosecutors'.

3 SERVICE DELIVERY

3.1 Interventions at Food and Feed Establishments

The premise profile for both food and feed premises is described in Appendices 3 and 4.

Food Premise inspections during 2013/14

The service will carry out inspections of all high risk food manufacturing premises along with all due upper medium risk manufacturing premises and 20% of the lower medium risk food manufacturing premises. The breakdown of these premises can be found in **Appendix 5**.

Feed Premise inspections during 2013/14

The service will conduct inspections at all high and the due upper medium risk feed manufacturers which are 'approved' or 'registered' with the authority as R1-4, R7 or R10 upper medium risk premises and 35 feed hygiene 'primary producers' (farms) as part of a comprehensive Animal Health inspection. The breakdown of these premises can be found in **Appendix 5**. An explanation of the approval codes and registration codes can be found at **Appendix 4**.

Animal health officers who are not yet competent to carry out feed enforcement will be given the opportunity to develop the necessary skills and competencies and will conduct surveillance whilst conducting farm inspections to inform future feed and farm food hygiene inspections.

In addition to the planned feed and food inspection and sampling activity, the service is in the process of working with Trading Standards colleagues across the East Midland (TSEM) to put together a regional bid for grant funding to the Food Standards Agency. This funding will be used to increase the number of planned inspections at feed and food hygiene businesses (farms) across the County.

It is likely that a number of additional interventions will be carried out at food and feed businesses as the result of a complaints and enquiries or as a result of a revisit.

Food and feed interventions will be carried out by authorised staff within the Standards and Animal Health Team. The team consists of 15.8 FTE officers including the Trading Standards Manager. The team is also responsible for the enforcement of Weights and Measure legislation including operating a metrology laboratory and calibration service and the enforcement of Animal Health and Welfare legislation. Work from other areas of the Trading Standards Service (Fair Trading and Safety and Business Support) is also periodically allocated to members of the Standards and Animal Health team.

The enforcement of food legislation will be conducted by 8 members of staff who hold the required qualifications and continual professional development (CPD). At present the service has two officers qualified and competent to deliver level two feed work and one able to deliver level one feed work. In addition to this a further 4 staff are currently receiving CPD which will lead to them also being authorised to undertake feed based work within this financial year.

The service considers that its approach of targeting resources at the greatest risk is appropriate and deliverable given the available resources. An estimate of the current staffing resources devoted to food and feed inspection activity can be found at **Appendix 6**. The estimated time includes the time spent giving advice to businesses during the course of the inspection process. Appendix 6 also includes an estimate of the resources required if the service was to deliver official controls at all Derbyshire food and feed premises at a frequency identified by its current risk assessment scheme.

The introduction of the Food Information Regulations is likely to have an extensive impact on the Service over the next couple of years. This is due to the staged transitional periods for various requirements, and because it is the most far reaching codification of labelling for some time. The level of demand is uncertain, although a number of the County's large manufacturers / importers have already sought advice from this Service. In order to ease this impact, the Service will communicate the new requirements to appropriate businesses.

Non-food and feed qualified staff from throughout the service may be involved in food and feed work which does not require a formal qualification and/or the required CPD.

3.2 Food and Feed Complaints

The majority of the complaints received by the service are received via the Citizens Advice Consumer Service (CACS). These are received into the service via a secure 'post office'

site. DTSS receives an average of 18,000 enquiries and the prioritisation process for these enquiries is explained at 2.4.

Last year the Service received 143 food related complaints and 4 feed complaints and it would be reasonable to expect the numbers to remain broadly the same in the forthcoming year.

An estimate of the current staffing resources which will be devoted to food and feed complaint work (based on the receipt of a similar number of complaints as 2012/13) can be found at **Appendix 6**.

Any complaints relating to food hygiene and microbiology are referred by the service to the District and Borough Council Environmental Health Departments.

3.3 Home Authority Principle and Primary Authority Schemes

DTSS takes its responsibilities under the home authority principle very seriously and all staff have access to training notes via Workbench to assist in ensuring they comply with best practice principles when enforcing all legislation, including food standards and feed related matters. The service's business advice policy which includes our approach to the Home Authority Principle can be viewed at

http://www.derbyshire.gov.uk/images/Business%20advice%20and%20enquiries%20policy_tcm44-8253.pdf

The service acts as Home Authority for several large national companies including Thorntons, Swizzels Matlow, Frank Wright Ltd, DSM Nutrition, Gunstones Bakery and Country Markets Limited.

In 2012/13, 18 food and 4 feed requests for advice relating to food and feed businesses for which the service acts as Home Authority were received. Similar levels of activity are anticipated in 2013/14.

An estimate of the current staffing resources which will be devoted to food and feed advice work (based on the receipt of a similar number of requests as 2012/13) can be found at **Appendix 6**.

At present the service does not act as 'Primary Authority' for any business, although one local business is currently expressing an interest in setting up an agreement.

3.4 Advice to Business

The Service offers both proactive and reactive advice to businesses. User satisfaction surveys are generated to monitor our activities coupled with a business consultation exercise. In 2012/13 the service received 89 requests for food advice and 14 requests for feed advice from businesses other than those for which it acts as Home Authority.

In addition, DTSS gave further proactive advice to 3,091 businesses as part of the project based activity detailed in **Appendix 10 and 11**.

An estimate of the current staffing resources which will be devoted to food and feed advice work (based on the receipt of a similar number of requests from non Home Authority businesses as 2012/13) can be found at **Appendix 6**.

The Service also gave pro-active advice to 92 food businesses and 34 feed businesses. This advice generally formed part of our routine work; hence a separate time allocation is not included in appendix 6 for this work. A similar level of activity is anticipated for 2013/14.

It is the continued intention of the service to develop closer links with business organisations, providing mechanisms of support for local businesses, both large and small.

DTSS has a comprehensive range of business advice leaflets which are freely available by the Departmental website.

http://www.derbyshire.gov.uk/business/trading_standards/business/business_leaflets/default.asp

As a service we are members of the D2N2 Better Businesses for All partnership which is facilitated by the Better Regulation Delivery Office (BRDO). This is a partnership which brings together regulators and businesses across Derbyshire and Nottinghamshire with the aim of improving the delivery of legislation in order to promote growth.

During 2013/14 the service will be advising a number of targeted businesses of major changes to the food labelling controls following the implementation of Europe wide Food Information Regulations.

3.5 Food and Feed Sampling

The Service's Food and Feed Sampling policy and current and past food and feed sampling programmes can be viewed at:

http://www.derbyshire.gov.uk/business/trading_standards/food_standards/sampling/default.asp

Food and Feed Sampling is generally carried out by members of the Standards and Animal Health Team. Where required by the Food and Feed Codes of Practice and legislation, formal samples will only be taken by qualified officers who hold the required CPD.

Quarterly sampling programmes are planned in conjunction with the Service's three Public Analyst partners. The programmes take into account changes to EC and UK legislation; current safety and labelling concerns; issues highlighted by staff and stakeholders; local, regional and national intelligence; and priorities identified by national bodies such as the Food Standards Agency priorities for feeding stuffs which can be found at:

<http://www.food.gov.uk/multimedia/pdfs/enforcement/enfe12008.pdf>

Each sampling programme usually includes formal and informal samples as well as an allowance for complaint and initiative samples taken by officers during routine visits. Sampling may also be carried out during the inspection of manufacturers and importers and may cover both ingredients and finished products. The programme for the April/May/June 2013 quarter is given as an example in **Appendix 7**.

Where relevant, DTSS will take part in both regional and national food and feed sampling surveys/ programmes. In 2012/13 the Service received a grant from the Food Standards Agency for food and feed samples which had been imported from outside the EC. This enabled DTSS to take a further 29 food and 10 feed samples. In addition, the Service was

involved in 'phase one and two' sampling following the horsemeat scandal. This amounted to an additional 13 samples the analysis of which was paid for by the Food Standards Agency.

During 2012/13, the Service spent £53,230 on the analysis of food and feed samples. 468 food and 50 feed samples were taken and submitted for analysis. The sampling budget for 2013/14 is set at £50,000 and it is anticipated that approximately 450 food and 50 feed will be taken.

32% of the food samples and 23% of the feed samples taken during 2012/13 have so far been reported as adverse. Results from 16 food samples and 1 feed sample are currently awaited. The failed samples were dealt with in a number of ways, for example providing business advice, referring the details to the Home or Primary Authority for the manufacturer/seller or the instigation of a formal investigation. The Service anticipates a similar percentage of failures during 2013/14.

An estimate of the current staffing resources which will be devoted to food and feed sampling work (taking into account a reduction in this year's budget) can be found at **Appendix 6**. It must be noted, however, that this estimate includes the time spent by non-food/feed authorised officers taking informal samples.

More details of the service's food and feed sampling activities for 2012/13 can be found at **Appendix 8**.

DTSS subscribes to and actively promotes the use of the national food and feed sampling database. The UK Food Surveillance system (UKFSS) is a national database for central storage of analytical results from feed and food samples taken by enforcement authorities (local authorities and port health authorities) as part of their official controls. The services has acted as a 'Super User' and given advice to other local authorities from throughout the Country on the setting up and use of the system.

3.6 Control and Investigation of Outbreaks of Food Related Infectious Disease

This is not applicable to the County function and remains the responsibility of the District and Borough Councils in Derbyshire. Were it necessary and appropriate, the service would provide all reasonable assistance.

3.7 Food and Feed Safety Incidents

A link to food and feed alerts published by the Food Standards Agency can be found on the services website, at http://www.derbyshire.gov.uk/business/trading_standards/food_standards/warnings/default.asp

Part of the service's documented quality system includes instructions about receiving and dealing with food and feed alerts which require action.

During 2012/13, 12 alerts for action were published by the Food Standards Agency. Other than a small amount of administrative time, these alerts led to very minimal impact on the resources of the service.

During 2012/13, the service notified the Food Standards Agency of potential food safety

issues on 9 occasions. One of these issues resulted in the Agency issuing a product withdrawal for some Chocolate and Pistachio ice cream cones which were found to contain the presence of undeclared nuts.

In addition, the service needed to commit a significant number of resources to respond to the horse meat scandal at the end of 2012/13 and the start of 2013/14. The service took 24 food samples which were analysed for the presence of beef, pork, sheep, poultry and horse DNA. Whilst none of the samples were reported as positive for horse DNA, 2 samples were reported as containing the unauthorised presence of other species. As a result of these two adverse results, one business received a letter of warning and the service is currently conducting a formal investigation in relation to the other failure. In addition to the samples, the service also conducted 12 inspections at approved processing premises as a result of a request from the FSA.

Due to the nature of such incidents, it is not possible to predict the resources required for 2013/14.

3.8 Liaison with other Organisations

The Service recognises the need to work with other organisations, both at a national, regional and local level for a number of reasons, including the need to ensure that best practice is shared and any enforcement action we take is consistent.

Trading Standards East Midlands (TSEM) Food and Feed Network - An officer from the service, represents the service at the regional TSEM Food and Feed Group. The group, which meets four times a year, is used as network to share best practice, intelligence and experience /knowledge as well as assisting with consistency of approach. As required, the group may provide targeted regional training and deliver regional sampling and project based activities.

It has recently been decided that rather than a regional Food and Feed network that the meetings will be split and hence in the future there will be a separate food and feed meeting.

The newly formed regional feed network will meet twice a year and an officer from this service will chair this group. It is intended that representatives from the Animal Health and Veterinary Laboratory Agency (AHVLA), the Veterinary Medicines Directorate (VMD) and others will be invited.

National Feed Panel - An officer from this service is a current member of the National Feed Hygiene panel which is hosted by the Food Standards Agency. The panel meets twice a year and issues related to feed safety that have national implications are discussed and actions agreed. Decisions and opinions of the group are then disseminated to local Trading Standards Colleagues through regional groups such as TSEM.

Derbyshire Food Liaison Group - The service meets 4 times a year with colleagues from all eight of the District Council Environmental Health Departments, Derby City Environmental Health, the Health Protection Agency and the Food Standards Agency regional team. During 2012/13, the group organised a joint Trading Standards and Environmental Health training day.

During 2012/13 (with the assistance of the Animal Health and Veterinary Laboratories Agencies Egg Marketing Inspectorate) the group undertook a project relating to the safety

and quality of eggs sold and used across Derbyshire. A report giving more detail about this work can be found at **Appendix 9**.

DTSS has got strong links with the Animal Health and Veterinary Laboratories Agency (AHVLA), mainly through its Animal Health functions.

In addition to the above, the service regularly liaises with a variety of other national and regional bodies and organisations such as

- Association of Chief Trading Standards Officers (ACTSO) and the National Trading Standards Board (NTSB).
- Medicines and Healthcare Products Regulatory Agency;
- HM Revenue and Customs
- International Federation of Spirits Producers Ltd (IFSP)
- Derbyshire Police

An estimate of the resources devoted to food and feed liaison with other organisations can be found in **Appendix 6**.

3.9 Food and Feed Standards and Safety promotional work and other non-official controls interventions

Food and Health work

The Service recognises that there is a close link between the food we eat and our health and recognises the importance of food and feed promotional activity.

During 2012/13, the service continued its work with local butchers and bakers to encourage them to reduce the levels of salt in locally produced sausage and bread. A report detailing our activities in this area can be found at **Appendix 10**. During 2013/14, the service will continue to work with businesses who want to reduce the levels of salt in their produce.

During 2013/14, the service will continue to provide the food manufacturers we visit with advice on how to reduce levels of salt, sugar and saturated fat etc as part of the scheduled food standards inspections.

DTSS is in the process of engaging with Public Health colleagues to see how we can work together to roll out the Department of Health Responsibility Deal Tool Kit to a wider range of Derbyshire businesses and workplaces. <https://responsibilitydeal.dh.gov.uk/wp-content/uploads/2013/04/130408-RD-Toolkit-Web-version.pdf>

During 2013/14, DTSS will work with colleagues in Derbyshire County Council (DCC) School Meals Service, Adult Services and the DCC Procurement Service to ensure that the County Council is receiving accurately labelled food, safe food and food which is compositionally correct. We will do this by taking samples and the targeted auditing of suppliers.

An estimate of the resources allocated to this type of activity can be found in **Appendix 6**

Feed Hygiene Work

The Feed (Hygiene and Enforcement) (England) Regulations 2005 require that all Derbyshire feed businesses within the supply chain are either registered or approved as appropriate with this service. The Service has 3599 livestock holdings, 565 of which have

returned a registration form. DTSS intends to start a rolling programme of writing to the remainder of the unregistered premises to establish their current feed activity. This will enable the Service to continue to target future resources at the areas of greatest risk.

During 2012/13, the Service wrote to 233 targeted farm premises to establish the extent of their activities and in particular whether they were using additives to manufacture their feed which gives rise to a greater risk. 33 of the premises that responded have indicated that they are manufacturing feed using additives although more work needs to be done to establish this for certain. A further 75 premises indicated that they were drying their grain using a fossil fuel based drier which increases the risk of contamination with dioxins, again more work needs to be done on this to establish the accuracy of this information. During 2013/14, this service will ensure that these businesses are registered with the appropriate code and update the database accordingly.

An estimate of the current staffing resources which will be devoted to promotional work and non official control work can be found at **Appendix 6**.

4 RESOURCES

4.1 Financial Allocation

The total financial resource for the Service (in terms of total net controllable budget) for 2013/14 is £2.086m. The Food and Feed enforcement activities are an integral part of this as depicted in 2.2 and appendix 1 and 2. It is not possible therefore to give an definitive level of expenditure specifically for food and feed services, but is estimated to be approximately £0.035m

The total provisional Public Analysts' budget for all analytical and consultancy work relating to food and feeding for 2013/14 is £50,000.

This Service has also contributed to an East Midlands bid to an FSA initiated pilot scheme to secure additional funding for food and feed hygiene enforcement activities. (At the time of writing the outcome of this bid has not been determined.)

All operational staff have a car allowance and are supported with appropriate equipment to facilitate their enforcement activities, including personal protective equipment, mobile telephones and a computer including email and internet facilities.

The service is supported by the CIVICA (Flare) computer database, which is used for planning, recording and monitoring activities. This system is supported and developed on an on-going basis by the company as part of an annual maintenance contract.

4.2 Staffing Allocation

Food and Feed enforcement is largely carried out by officers within the Standards and Animal Health Team. The structural chart depicting the service can be found at **Appendix 2**. This chart identifies the qualified and competent staff who deliver the services food and feed functions.

An estimate of the staffing resources devoted to food and feed enforcement during 2013/14 is shown in **Appendix 6**.

Appendix 6 also depicts an estimate of the number of FTE that would be required in order for the service to resource the appropriate 'official controls' at a level recommended by the Food Safety Act Code of Practice.

4.3 Staff Development Plan

The service is committed to staff development and the authority has achieved the Investor in People Standard.

All members of staff participate in an annual "My Plan" staff development discussion which is subject to an on-going review. The process is objective based and is designed to ensure that staff are equipped to meet the priorities identified in the annual service plan and this Food and Feed Plan.

All food and feed officers are required to achieve the minimum 10 hours annual food and feed CPD (as appropriate) to maintain their food and feed competencies required by the Food and Feed Codes of Practice.

5 QUALITY ASSESSMENT

5.1 Quality Assessments and Internal Monitoring

The Service is ISO 9001: 2008 registered, the accreditation body being NQA. The issuing, control and review of policies, procedures, and advisory leaflets etc. is done using a software package named "Workbench".

All food and feed activities have been and will continue to be integrated into the quality system and are subject to an annual review.

The service is committed to engaging with its customers and as part of this the Cultural and Community Services Department has achieved the Customer Services Excellence Award.

This service will support the principle of peer review with neighbouring authorities within Trading Standards East Midlands.

6 Review

6.1 Review against the service plan

In 2013-14, DTSS will:

- Conduct regular workload reviews in accordance with internal guidance. At these reviews Managers check individual officer progress on allocated and scheduled work linking back to this plan and the Cultural and Community Services Service Plan which can be viewed at http://www.derbyshire.gov.uk/images/Service%20Plan%20-%20CCS%20-%20%20Trading%20Standards%20Division_tcm44-203420.pdf
- Ensure that the plan is regularly reviewed by Trading Standards Managers in accordance with Divisional Operating Procedure 2.7 and Terms of Reference AN 49.
- Report to Departmental Management on any Food or Feed related indicators. This is done using the corporate performance management system.
- Report food and feeding stuffs issues to the Cabinet Member for Health and Communities via the CabCo process as described above.

6.2 Identification of any variation from the service plan

In 2013-14, DTSS will;

- Identify variations from the plan;
- Analyse the reasons for the variations;
- Develop corrective actions;
- Document these on the Service's Business Action Plan; and
- Review the content of the plan to ensure it continues to meet the needs of our stakeholders.

61.3 Areas for Improvement

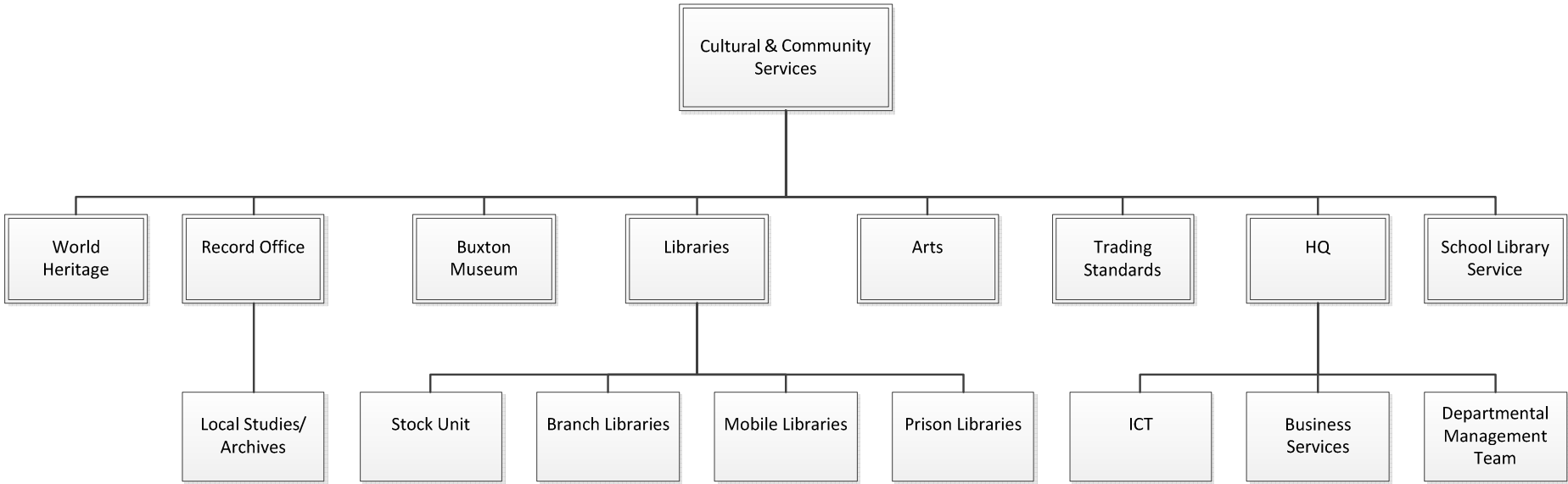
In 2013-14, DTSS will;

- Identify areas for improvement; and
- Incorporate in the 2014-15 food and feed law enforcement plan if appropriate, or deal with immediately if required.

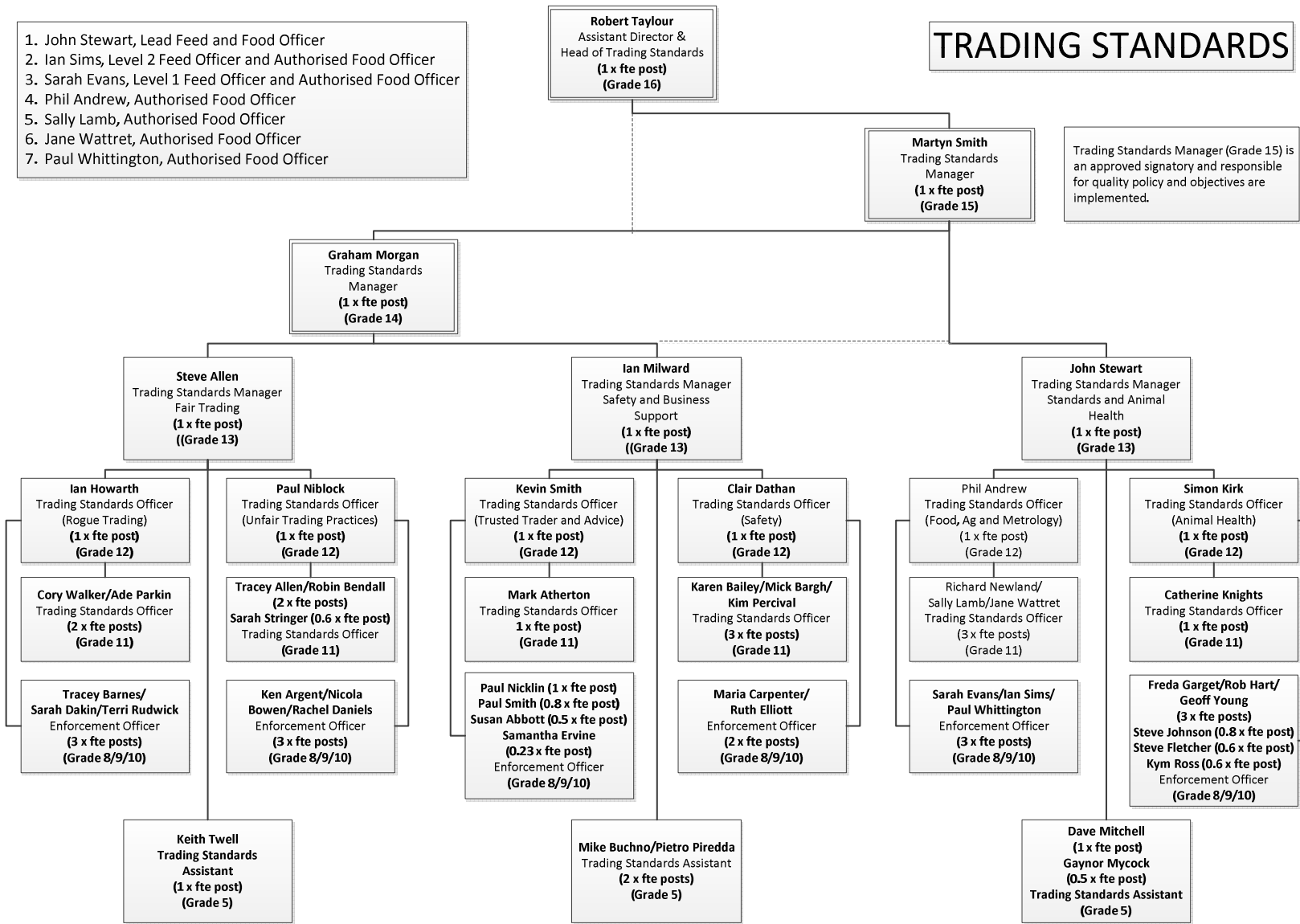
APPENDIX 1

DERBYSHIRE COUNTY COUNCIL. TRADING STANDARDS DIVISION
Controlled Stationery

TS 160 Agriculture Sample Form SD3



APPENDIX 2



APPENDIX 3

Food Premises

Risk Band	Frequency of intervention	Number of premises on the services database
High	Every 12 months	37
Upper medium	Every 24 months	860
Lower medium	Every 60 months	4457
Low	No recommended frequency	1454
Food businesses where food is not the basis for the risk*	Estimate at every 60 months for the food element	1489

Feed Premises

Risk Band	Frequency of intervention	Number of premises on the services database
High	Every 12 months	3
Upper medium	Every 24 months	33
Lower medium	Every 60 months	3611
Low	No recommended frequency	8
Feed businesses where food is not the basis for the risk*		537

NB the service is in the process of fully implementing the new National Trading Standards risk rating scheme, hence the food and feed risks may change.

* These premises are businesses where food or feed is a smaller part of their main business, for example a department store which sells a limited range of food or pet food or a craft shop that sells a few prepacked chocolate bars.

APPENDIX 4

Registration code	Activity description	Number of premises
R1	Manufacture and/or placing on the market of feed additives (other than those subject to approval).	5
R2	Manufacture and/or placing on the market of premixtures (other than those subject to approval).	2
R3	Manufacture and/or placing on the market of bioproteins ("certain products") not subject to approval.	2
R4	Placing on the market of compound feeds.	9
R5	Manufacture of pet foods.	24
R6	Manufacture and/or placing on the market of feed materials.	5
R7	Manufacture and/or placing on the market of feed materials.	60
R8	Transport of feed and feed products.	48
R9	Storage of feed and feed products.	13
R10 (Farms)	Mixing feeds, on farms, with additives and premixtures.	5
R11 (Farms)	Mixing feeds, on farms, with compound feeding stuffs which contain additives.	383
R12	Food Businesses selling co-products of the food industry which are destined as feed materials.	21
R13 (Farms)	Livestock farms (including fish farms) which do not mix feeds or mix feeds without additives.	3292
R14 (Farms)	Arable farms growing or selling crops for feed.	21

APPENDIX 5

Schedule of food visits 2013/14

Risk Band	Number of premises
High*	37
Upper medium	29
Lower medium	11

Schedule of feed visits 2013/14

Risk Band	Number of premises
High	3
Upper medium	7 check these figures
Lower medium	35 (primary production visits)

* 21 of the 37 premises will definitely receive an inspection and the remaining 16 premises will be subject to an initial desktop inspection in order that an accurate risk can be established. It may be that all or a proportion of these 16 premises form part of the services inspection activity during 2013/14.

APPENDIX 6

Resources required

Area of work	Estimated time for food element (HRS)	Estimated time for feed element (HRS)
Inspection activity including food hygiene inspections at primary producers	403	178
Complaint activity	572	96
H/A advice activity	90	20
Non H/A advice activity	267	42
Food and Feed Sampling activity	1402	202
Liaison with other organisations	119	22
Maintenance of CPD	224	196
Project/ promotional based activity	111	259
Other work not work not identified above*	1480	444
Total of planned activity 2013/14 (FTE officers)	3.1	1
Total resources required to carry out all inspection based activity at the rate expected by the Food and Feed codes of practice	4.8**	1.75**

*This includes other infrastructure type activity, investigation work, court preparation work; the management of the services quality system, staff workload reviews, administration of the feed register, annual returns and the My Plan process.

**This estimated figure only relates to the resources required for the inspection activity at the first line of the above table.

APPENDIX 7

Food Sampling Programme 1st Quarter 2013-2014 April/May/June 2013

Project Code	Product	Number	Formal/ Informal
PRH	Initiative, Complaint and Follow up <ul style="list-style-type: none"> To include follow up samples of 'healthy options' meals, for nutritional analysis – see SLL for details 	10	F/I
PRA	Non Retail FSI Visits <ul style="list-style-type: none"> As part of Food Standards Inspection Programme 	5	F/I
PC2	Wholemeal bread (from local manufacturers/ supermarket in-store bakeries) <ul style="list-style-type: none"> Analysis to check level of crude fibre 	25	I
P58	Dried vine fruit <ul style="list-style-type: none"> Analysis for ochratoxins and SO2 Samples to be taken from local manufacturing bakers, catering establishments and 'weigh and save' type retailers 	15	F
PH5	FSA <u>Imported Food</u> survey <ul style="list-style-type: none"> Sample details and numbers to be confirmed 		
	Total Food Samples	55	

Agriculture Sampling Programme EUROFINS

Project Code	Product	Number	Formal/ Informal
PAG	Animal Feeds	5	F/I
PR2	FSA Imported Feed survey <ul style="list-style-type: none"> Sample details and numbers to be confirmed 		
	Total Agriculture Samples	5	

STAFFORDSHIRE

Project Code	Product	Number	Formal/ Informa
PRH	Initiative, Complaint and Follow up	5	F/I
PRA	Non Retail FSI Visits <ul style="list-style-type: none"> As part of food standards inspection programme 	5	F/I
PX1	Ground nut powders <ul style="list-style-type: none"> Analysis for substitution or cross contamination with peanut Sample from catering establishments (Indian takeaways?) and local manufacturing bakeries 	12	F
PX2	Plastic bags/film <ul style="list-style-type: none"> Analysis for chemical migration Sample in accordance with Plastic Materials & Articles in contact with Food Regs (3 items per sample portion) Samples to include products from the lower end of the market and from local food manufacturers if possible 	10	F
PD7	Foods making omega 3 fatty acid claims (fish fingers, eggs, food supplements etc.) <ul style="list-style-type: none"> To check levels of omega 3 and legality of any claims under Nutrition and Health Claims Regs 	15	I
	Total food samples	47	

Agriculture Sampling Programme STAFFORDSHIRE

Project Code	Product	Number	Formal/ Informal
PAG	Animal Feeds	5	F/I
	Total Agriculture Samples	5	

WEST YORKSHIRE ANALYTICAL SERVICES

Project Code	Product	Number	Formal/ Informal
PRH	Initiative, Complaint and Follow up	5	F/I
PRA	Non Retail FSI Visits <ul style="list-style-type: none"> As part of food standards inspection programme 	5	F/I
PV5	Breaded Scampi <ul style="list-style-type: none"> To check accuracy of description (i.e. not reformed when described as 'wholetail'); fish content; and level of salt Samples to be taken from catering establishments (where menu description can be checked) and lower end of the market retail products 	12	F
PP1	Burgers from catering vans <ul style="list-style-type: none"> Analysis for species, including horsemeat, by ELISA method Sample uncooked product 	10	F
	Total food samples	32	

Agriculture Sampling Programme WEST YORKSHIRE ANALYTICAL SERVICES

Project Code	Product	Number	Formal/ Informal
PAG	Animal Feeds	5	F/I
	Total Agriculture samples	5	

APPENDIX 8

Project Report Form

Trading Standards Division - Report on Project Activity

Food & Agriculture Sampling 2012-2013

Outline & background to project

Sampling of food and animal feed is undertaken by the Food, Feed, Animal Health & Metrology Section of Derbyshire Trading Standards Division. Officers routinely sample food from retailers, wholesalers and caterers to check compliance with labelling legislation and compositional standards. These samples may be taken on the officer's initiative or as a result of complaints received by the Division. Samples are also taken from manufacturers, in support of Food Standards Inspections, to help ensure the production of legally compliant products. Routine sampling of animal feeds is carried out at manufacturers' premises and during farm visits, where both commercially manufactured feeds and home grown cereals for feeding to livestock may be tested.

In addition to routine sampling, particular food categories or trade sectors may be targeted in specific surveys, where it is felt there could be labelling, composition or health related issues for consumers. The majority of these surveys are restricted to sampling activity within Derbyshire, although the Division may also contribute to regional and national surveys co-ordinated by Trading Standards East Midlands or the Food Standards Agency.

Food and agriculture sampling within the section is organised via a series of quarterly sampling programmes. These are produced following meetings with the Public Analyst, during which potential areas for sampling are discussed. Targeting of sampling can be driven by local or national intelligence; issues raised through RASSF alerts; and national food and feed sampling priorities published by the Food Standards Agency. The Division also participates in the UK Food Surveillance System (UKFSS), a national database of sampling activity maintained by the Food Standards Agency, which can also be used to inform the sampling programme where issues have been raised as a result of sampling in other parts of the UK. The quarterly sampling programmes specify the number and type of samples to be taken and generally include a mixture of both formal and informal samples. The number of samples and analysis costs are monitored throughout each quarter to ensure that the budget remains within target.

Unsatisfactory sample reports are followed up by trader advice; referrals to home authority; the taking of further samples; or formal action as appropriate. If a particular survey has highlighted issues of concern the findings may be publicised by way of a report to CABCO and possibly a press release.

Justification for project

The Authority has a statutory duty to carry out Food Standards and Feed enforcement work, which requires the implementation of a food and feed sampling plan. The Division has to complete a statutory return on the level of activity during the year, of which this plan is part.

Protecting the food chain from ‘farm to fork’ is a priority for the Division and contributes to ‘Encouraging Healthy, Active and Rewarding Lifestyles’. Food and feed sampling will also feed into the Council plan for a ‘Resilient Economy’ – Supporting specific growth sectors in the county, including food and drink, tourism and environmental technologies; and into the Council plan for ‘Confident and Safe Communities’ - Tackling unsafe and unfair trading practices.

High levels of fat and salt in foods have been linked to conditions such as obesity, high blood pressure and heart disease. Sampling of food products where nutritional information isn’t provided or where there may be a misconception that certain types of food are ‘good for you’ can help to raise consumer awareness of diet related health issues. Checking the accuracy of nutritional information on labels can also ensure that consumers are able to make an informed choice about the food they eat, again helping to promote public health.

Analysis of animal feeding stuffs contributes to protecting the welfare of animals by ensuring that the food they receive is safe and provides the nutrients they need for normal growth and development. In the case of feed for livestock animals this ultimately helps to ensure the safety of the food chain as a whole.

Activities Undertaken

The combined budget for food and agriculture sampling during 2012-2013 was set at £60,000. This was allocated between the Public Analyst laboratories of Staffordshire Scientific Services; Public Analyst Scientific Services Ltd; and West Yorkshire Analytical Services. The final spend was £53,235.

The following is a breakdown of the sampling activities undertaken:

- Routine food and agriculture samples taken throughout the course of the year (154 samples)
- Specific product/trade areas targeted as a result of quarterly meetings with the Public Analysts (257 samples, as detailed below)

Food Category	Reason for Sampling
Takeaway curries	To check the level of artificial colours
Minced beef	To check the fat content and test for the presence of undeclared meat species and sulphite preservatives
Kebabs and other lamb based meals from takeaways	To test for the presence of other meat species
Children’s meals from catering establishments	To check nutritional content (as a comparison against meals supplied by nursery providers)
Non- pre packed bakery products	To test for the presence of undeclared allergenic ingredients

Foods containing artificial colours potentially associated with hyperactivity	To check for the presence of mandatory warning statements
Rice noodles and other rice products	To test for the presence of non-authorised genetically modified material
Salami and similar cured meat products	To test for the presence of undeclared meat species
Vegetable oils	To test for the presence of mineral hydrocarbons
Meat pates and pastes	To check levels of fat, saturated fat and salt
Brioche, croissants and similar products	To check butterfat content
Food supplements	To test for the presence of heavy metals
Ice cream and snack products containing nuts other than peanut	To check for contamination/adulteration with peanut
Dried fruit and nut mixtures	To test for the presence of mycotoxins
Sherry and port (from the cheaper end of the market)	To verify the alcohol content and test for the presence of mycotoxins and undeclared sulphites
Meals from takeaways and fast food outlets	To investigate the significance of portion size on nutritional content
Locally produced honey	To verify authenticity of origin claims
Locally produced ready meals	To check nutritional content
Barbecue meat products	To test for the presence of artificial colours potentially associated with hyperactivity
Spices	To test for the presence of aflatoxins
Cupcakes	To test for the presence of undeclared additives

- Samples taken in support of Food Standards Agency surveys on imported food and feed; and undeclared meat species in processed meat products (47 samples in total)
- Samples taken in support of collaborative project work i.e. Trading Standards East Midlands project on spirit authenticity; and Derbyshire Food Liaison Group project on egg quality and labelling (36 samples in total)
- Samples taken in support of other projects carried out by the Division during 2012-2013 i.e. the project on 'Excess Packaging'; and follow up samples to the project on 'Salt

Reduction in Bread', initially carried out in 2011-2012 (16 samples in total)

- Samples taken on behalf of other departments within the authority i.e. the School Meals Service (to check for the presence of undeclared meat species in beef products); and the Derbyshire Food & Drink Awards (for assessment under the category of 'healthy eating venues') (8 samples in total)

Results

A total of 518 samples were submitted over the course of the year, comprising 50 agriculture samples and 468 food samples.

The percentage of samples reported as unsatisfactory was 30%. Although the majority of these related to labelling issues, a number of compositional problems were identified which are further detailed below.

Significance of Results

The following are some of the surveys where sampling has highlighted issues of interest:

1. Undeclared species in meat products

The presence of undeclared species in meat products continues to be an issue, whether it is through inadvertent cross-contamination, or deliberate substitution of one species of meat with a cheaper alternative for financial gain. Under the Food Safety Act 1990 it is an offence to sell, to the prejudice of the purchaser, food which is not of the nature, substance, or quality demanded; and also to label food in such a way as could mislead the purchaser. Notwithstanding any contravention of legal requirements, the presence of undeclared meat species can also be of serious consequence to sectors of the population who do not eat particular types of meat on religious grounds.

During the course of the year, a number of programmed surveys of meat products for undeclared species were undertaken. In a survey of 15 salami-type cured meat products, one was found to contain traces of chicken in addition to pork. Fifteen samples of minced beef were tested for the presence of other meat species and undeclared sulphite preservatives. In this instance, none of the samples contained species of meat other than beef. However, a survey of lamb based dishes (specifically kebabs and similar products) from Indian takeaways highlighted this as a potential area for concern. Of the 15 products sampled, 11 contained species of meat other than lamb, which were not made known to the purchaser. These informal samples are currently being dealt with by means of a programme of advice visits/follow up formal samples as appropriate.

The issue of undeclared meat species also came to the forefront nationally earlier this year as a result of the 'horsemeat scandal'. Derbyshire was one of the local authorities asked by the Food Standards Agency to participate in a national programme of sampling of processed beef products. A total of 13 products, comprising burgers and ready meals, were submitted for species determination by DNA analysis as part of this survey: and a further 4 products supplied into Derbyshire schools were also tested for the presence of horsemeat at the request of the Council's School Meals Service. Reassuringly none of the products were found to contain horsemeat. However, two of the burgers sampled as part of the FSA survey were found to contain species of meat other than beef. One product, produced by a local manufacturing butcher, contained a small amount of lamb in addition to beef: this has been dealt with by means of a letter of warning. The second product, whilst described as a 'Premium Beefburger', was found to be composed predominantly of chicken and turkey with a maximum beef content of 30%, and possibly as little as 5%. The manufacturer of this product is currently under investigation with a view to formal action being taken.

2. Colours in Foods

The use of colouring materials in foods is controlled by EC Regulation 1333/2008, enforced by the Food Additives (England) Regulations 2009. These regulations prescribe the colours which are permitted for use in certain foods and the safe levels at which they can be incorporated. Curries from takeaway establishments have a tendency to be quite highly coloured and are often produced under conditions where the addition of ingredients may not be as tightly controlled as in commercial manufacturing facilities. Problems have been found in the past with excessive levels of colour. As part of the sampling programme, 18 products from takeaway establishments were submitted for testing, of which 15 were found to contain artificial colours. Whilst the colours in the majority of them were present at relatively low levels, 2 products exceeded the maximum limits prescribed by the Regulations. One of these has been dealt with by a letter of advice to the trader. In the case of the second product an advice visit has been made to the trader and further samples are due to be taken at a future date.

In addition to controls on the quantity of colours which may be used, since January 2012, as a result of studies on hyperactivity in children, it has been a requirement under the above Regulations that pre-packed foods containing certain colours must bear a warning statement to the effect that the colour may have an adverse effect on activity and attention in children. The colours specifically identified are Tartrazine, Quinoline Yellow, Sunset Yellow, Carmoisine, Ponceau 4R and Allura Red (known collectively as the Southampton Colours'). Whilst most manufacturers are now compliant with this requirement, some products, particularly imported products or products from the lower end of the market still do not carry the necessary warning. In a survey co-ordinated by Public Analyst Scientific Services Ltd, it was found that 8 out of 10 products sampled within Derbyshire failed to comply with the requirements. These issues have been dealt with by a referral to the home authority, where appropriate, or by direct advice to the trader.

3. Spirit Authenticity

Towards the end of 2012 Derbyshire participated in a joint Trading Standards East Midlands project around the authenticity of spirits supplied in pubs and nightclubs. Watering of spirits and substitution of branded products with cheaper alternatives are problems which have been around for many years. Both these practices constitute offences under the Food Safety Act 1990 and the Consumer Protection from Unfair Trading Regulations 2008. More recently, the counterfeiting of spirits has become an issue, particularly where the product supplied may actually be unsafe due to the presence of other alcohols such as methanol.

As part of the survey Derbyshire submitted 16 samples of various spirits for analysis. Seven of these were reported as adverse by the Public Analyst due to a deficiency in alcohol. The majority of the deficiencies were relatively small and were thought to result from the use of 'bottle top pourers', where the bottle is effectively open to the atmosphere and alcohol can be lost naturally through evaporation. However one product was significantly deficient in alcohol, containing only 30.8% against a declaration of 37.5%. Formal follow up samples have been taken, one of which was again deficient in alcohol, although only by a small amount. Further samples are to be taken at a future date. The results of the initial survey were publicised by way of a press release.

Earlier in the year, as a result of sampling activities carried out at a licensed premises where complaints had been received from the police, an investigation was instigated against the DPS for the substitution of Smirnoff vodka with an alternative brand. The DPS

has since accepted a simple caution.

4. Allergens

The non declared presence of allergenic ingredients in foods can have serious consequences for allergy sufferers: for nut allergy sufferers, in particular, the results may even be fatal. Under the Food Labelling Regulations 1996, there is a legal requirement for the labelling of pre-packed foods to make clear reference to the presence of any specified allergenic ingredients. However this will not address the situation where allergens are inadvertently present through cross contamination, or where one ingredient has been deliberately substituted with an allergen.

As part of the sampling programme, products labelled as containing nuts other than peanut were tested for the presence of peanut, to check for cross contamination or deliberate substitution. A total of 10 products were analysed of which 2 were found to contain small amounts of undeclared peanut. Both these issues were referred to the Food Standards Agency as Food Incidents and one of them resulted in a product withdrawal.

Following a complaint from a peanut allergy sufferer, who had suffered a severe allergic reaction after eating a meal from an Indian restaurant believed not to contain any peanut, analysis of the ingredients used indicated that a product described as 'almond powder' did in fact contain peanut at levels in excess of 0.2%. This issue was again referred to the Food Standards Agency as a food incident.

5. Egg Quality

During 2012-2013 the Division participated in a joint project with district Environmental Health Departments and the Egg Marketing Inspectorate of the Animal Health and Veterinary Laboratories Agency. The project was aimed primarily at increasing the awareness of catering establishments to ensure that only correctly labelled eggs of class A eggs quality are used. Samples were procured from a number of catering establishments (and also retail outlets) across the county, for examination by the Egg Inspector. As part of the project, 20 samples of, mainly locally produced, eggs were also submitted to the Public Analyst to be tested for coccidiostat residues and the chemical canthaxanthin.

Coccidiostats are veterinary medicines added to feed to treat coccidiosis in laying birds: canthaxanthin is a colouring agent added to poultry feed to promote the yellow colour of the yolk. The use of both these additives in poultry feed must be carefully controlled to ensure that the amounts carried over into the egg do not exceed maximum permitted levels.

Analysis of the 20 samples submitted found detectable levels of the coccidiostat Lasalocid in 2 products and canthaxanthin in a third, however these were all well below the prescribed maximum limits, confirming the suitability of the feed used.

6. Nutritional content of meals from takeaways and fast food outlets

The examples given above indicate the importance of food sampling in protecting consumers from fraud and ensuring that the food they eat is safe. However, sampling can also be used to increase consumer awareness about diet and health related issues, and as a driver to work with local businesses to help promote 'healthier' meal alternatives - an increasingly important role given that local authorities have now assumed responsibility for Public Health.

Takeaway meals traditionally have a reputation as being high in fat, saturates and/or salt, but the size of the portion also has a very significant effect on how 'unhealthy' or otherwise

the meal actually is.

Twenty four meals from a variety of takeaways and fast food outlets were submitted for nutritional analysis and the results reported on a 'per 100g' basis and also a 'per portion' basis. Looking at the results of fat analysis, on a per 100g basis 96% of the meals tested would have been classed as 'Amber' (or medium) under the Food Standards Agency Traffic Light system (i.e. between 3 and 20g fat per 100g). However, calculating the fat content on a per portion basis would mean that 96% of the meals were 'Red' (or high) in fat. 38% of the meals actually contained more than 70g of fat, which is the Guideline Daily Amount (GDA) for an adult female; and 50% contained more saturated fat than the GDA of 20g. Similarly for salt, looking at the results on a per 100g basis, 96% of the meals were either 'Green' (i.e. low) or 'Amber', having a salt content of 1.5g per 100g or less. However, taking portion size into account, 46% of the meals actually provided more than the 6g GDA for an adult female and the Public Analyst commented that some of them could almost be considered unsafe under the General Food Regulations 2004. These results are possibly not surprising when you consider that 7 out of the 24 meals sampled weighed more than 1kg. The results of this survey will form the basis of on-going discussion between the Division and Public Health.

Conclusion

The results of the 2012-2013 sampling programme indicate that as well as fulfilling a statutory function, food and agriculture sampling continues to play an important role in promoting health issues and protecting the interests and safety of Derbyshire consumers 'from farm to fork'. By helping to ensure that manufacturers comply with labelling and compositional standards it also assists in promoting a fair trading environment for Derbyshire businesses.

Recommendations

It is recognised that, given the budget constraints which local authorities are likely to be operating under for the foreseeable future, funding for food and agriculture sampling is unlikely to continue at the present level. However, as clearly evidenced by the 'horsemeat scandal', the current economic climate also means that food fraud is likely to remain an issue, wherever unscrupulous traders can see an opportunity for financial gain. It is, perhaps then, even more important that provisions are in place to help protect the health and safety of consumers and ensure that Derbyshire businesses can operate in a fair trading environment. It is therefore recommended that food and agriculture sampling should continue in the current format.

SL Trading Standards Officer
12 July 2013

APPENDIX 9

Joint Environmental Health, Trading Standards and Egg Marketing Inspectorate Egg Project 2012 Report

Background to Project

Unlabelled Class B eggs have recently been found in a number of catering establishments in Derbyshire. Problems have also been found with eggs supplied to catering establishments in other authorities in the East Midlands region. Previous Trading Standards projects have identified problems with the quality and descriptions applied to eggs.

The aim of the project was to inform and reduce mis-description and possible mis-use of class B eggs in catering.

The collection of eggs from various premises would give an indication as to how extensive the problem is within Derbyshire and whether food business operators had read the information that was distributed prior to the visits. Ensuring that caterers in Derbyshire are using Class A eggs will help to protect the people in Derbyshire from eggs that are unsafe, inferior quality and/or misdescribed.

Prior to the collection of egg samples, Trading Standards sent 2,875 letters and leaflets to catering establishments and 44 letters to egg producers/packers informing them of the legal requirements concerning the sale and type of eggs that were acceptable and to notify traders of the forthcoming initiative.

Sampling Methods

The Egg Marketing Inspector requested that each sample consisted of a minimum of six eggs but preferably twelve eggs to improve consistency of the analysis. Each authority were allowed to decide whether the samples would be collected in their original containers or transferred to containers that would protect the eggs from damage. Each authority was also allowed to decide whether the eggs were purchased from each premise, replaced with grade A eggs or taken by agreement, without reimbursement. The cost of reimbursing the premise was from each authority's own budget provision as there was no funding available for this project.

Sample Collection

The eggs were collected from retail premises by Derbyshire Trading Standards officers and from catering premises by Local Authority Environmental Health officers. Each authority was able to collect a maximum of 15 samples per month and each sample was submitted with a completed questionnaire. If an authority was unable to collect samples, they could submit completed questionnaires without eggs.

Authority	Number of egg samples submitted	Number of Questionnaires only submitted
Amber Valley	1	0
Bolsover	5	0
Chesterfield	5	0
Derbyshire Dales	28	1
Erewash	11	16
High Peak	0	0
North East Derbyshire	7	0
South Derbyshire	30	0
Trading Standards	32	0
Total	119	17

Sample Analysis

The Egg Marketing Inspectors carried out external checks on each egg for shell issues which included shape, bumps in the shell and cleanliness. They “candled” the eggs, which is when a bright light is shined through the egg, to check for cracks and the size of the air sac. The eggs were held under an ultra violet light to check for markings on the shell. These markings enabled the inspectors to determine whether the eggs were free range or caged and whether these had been washed.

When the analysis was complete, the results were compared against the information provided on the questionnaire to check that the eggs had been properly described and within the use-by dates. Producer and packer information on the eggs and packaging was then verified by the Egg Marketing Inspectors.

Derbyshire Trading Standards submitted 20 egg samples to their Public Analyst to test for canthaxanthin and coccidiostat residues. Canthaxanthin is an additive added to feed to give the egg yolk a deeper yellow colour. Coccidiostat residues are from veterinary medicines used to treat coccidiosis in laying birds.

Results

The Egg Marketing Inspectors found concerns with 27 of the egg samples, these included:

- Eggs sold as being free range when there were potential cage markings on the shells
- Eggs being sold at retail premises in packaging with no information
- Non registered egg producers or packers selling or providing eggs
- Illegible code markings on eggs
- Eggs that had been washed or wiped (see appendix)
- Caterers buying eggs that were not grade A from “farm gate sales”
- Eggs that were not stamped with the producer code
- Eggs that were poor quality

Trading Standards chemical testing results were:

Canthaxanthin – one sample contained a small amount but it did not exceed the maximum permitted level.

Coccidiostat residues – two samples contained a coccidiostat called lasalocid, the amount was below the maximum permitted level laid down by legislation.

Questionnaires from catering premises – lack of information about suppliers and use by dates of the eggs

Action Taken

Egg Marketing Inspectors: Visit producers, packers and wholesalers to discuss the issues relevant to each premise. Complete ultra violet checks on some class A eggs to check that these have not been washed. Ensure that all the premise operators are aware of the information that should be available with the eggs and the labelling requirements (see appendix). Remind the premise operators that washed eggs cannot be graded as class A and that caterers can only be supplied with class A eggs.

Trading Standards: Visit the premises to discuss relevant issues and provide the appropriate advice which may include the need for registration or providing information with the eggs.

South Derbyshire District Council: Letter sent to the relevant premises with the leaflet to re-iterate that catering premises should only use class A eggs. Compliance will be re-checked at the next routine inspection.

Bolsover District Council: Visit the premise as part of an intervention and advise the food business operator about the supply of ungraded / unstamped eggs to other businesses. If possible ascertain source of the eggs and who is describing the eggs as “free range”. Update Trading Standards accordingly.

Conclusion

The awareness of catering and retail food businesses in Derbyshire has been raised in relation to the descriptions and documentation required. Out of a total of 119 egg samples submitted from around Derbyshire, 22% of the samples had issues associated with quality or labelling. No illegally imported eggs were found. Officers were reminded of the importance of considering eggs during routine inspections and the initiative has demonstrated that enforcement authorities working in partnership can achieve more than working in isolation.

SS Technical Officer (Commercial)
Environmental Health, South Derbyshire District Council

Dated: January 2013

Appendixes

Further information that may be of interest:

The origin of the eggs sampled (or examined on inspection, but no sample taken) was:

Country	Number of samples
UK	113
Scotland	1
Northern Ireland	6
Ireland	2
France	1
Netherlands	1
Germany	2
Portugal	1
Poland	1
Spain	2
Unstamped (presumed UK)	7

CODES FOR THE MEMBER STATE OF REGISTRATION

In respect of eggs the codes for the Member State of Registration are laid out in the Commission Directive 2002/4/EC of 30 January 2002 on the registration of establishments keeping laying hens, covered by Council Directive 1999/74/EC.

The codes (which are tabulated below) can be found by following the following link: [*Commission Directive 2002/4/EC - EUR-Lex*](#)

Country Code	Country
AT	Austria
BE	Belgium
DE	Germany
DK	Denmark
ES	Spain
FI	Finland
FR	France
GR	Greece
IE	Ireland
IT	Italy
LU	Luxemburg
NL	Netherland
PT	Portugal
SE	Sweden
UK	United Kingdom

Labelling information required is as follows:

(17.2) Graded Class A eggs, must immediately after grading, be placed in packs and be labelled with the following information:-

- a) The quality class A
- b) The weight grading (see weight grading above about mixed-weight packs)
- c) The best before date (a maximum of 28 days after laying)
- d) Method of production
- e) Advice to the consumer to keep eggs chilled after purchase
- f) Explanation of the code stamped on eggs
- g) Packing Centre Code
- h) Name of product i.e. eggs (required by Council Directive 2000/13)
- i) Name and address of packager or seller (required by Council Directive 2000/13)
- j) The number of eggs – unless it is easy to determine the number of eggs within the pack (Council Directive 2000/13).

This is also the information which must be displayed if the eggs are being sold loose and packed into boxes by the end consumer.

If a wholesaler splits a box for sale, they must send the above information with the trays of eggs if no box label can be sent with them.

The following are the quality characteristics for graded eggs:

15. Quality grading and storage of eggs

Class A eggs shall have the following quality characteristics:

- a) shell and cuticle: normal shape, clean and undamaged;
- b) air space: height not exceeding 6 mm, stationary; however, for eggs to be marketed as „extra“ it may not exceed 4 mm;
- c) yolk: visible on candling as a shadow only, without clearly discernible outline, slightly mobile upon turning the egg, and returning to a central position;
- d) white: clear translucent;
- e) germ: imperceptible development;
- f) foreign matter: not permissible;
- g) foreign smell: not permissible.

Class A eggs shall not be washed or cleaned, before or after grading (no exceptions apply in the UK).

Bed and Breakfast Premises

Queries have been raised about the use of eggs produced by their own birds in these premises, below is a link to an archived DEFRA document that provides some advice:

<http://archive.defra.gov.uk/foodfarm/food/industry/sectors/eggspoultry/faq/eggmarketing.htm>

Other types of catering establishments may only use their own produced eggs if these have been graded so would need to register as a producer and packer.

GUIDANCE – APPROVAL OF ESTABLISHMENTS (EGG PRODUCERS)

The Food Standards Agency (FSA) has recently issued revised guidance for the use of Local Authorities in relation to the approval of food business establishments that handle products of animal origin (POAO).

The guidance sets out exemptions from the requirement for approval which fall into three categories.

1. the “direct supply of small quantities of primary products to the final consumer”
2. “retail” and
3. “composite products”.

Further details can be found in the document: FSA’s guidance for local authority authorised officers on the approval of establishments (issued Oct 12). The guidance can be found at the following link:

<http://www.food.gov.uk/enforcement/sectorrules/approvalsguidance>

Following discussions with the Food Standards Agency and Egg Marketing Inspectors it has been concluded that further clarification is required on the interpretation of the above guidance which is intended to be discussed at the next DFLG meeting.

In the meantime the following summarises our interpretation of the guidance in respect of eggs:

1. “Direct supply of small quantities of primary products to the final consumer”

- Egg producers already authorised by the Egg Marketing Inspectorate (EMI) as packing centres under DEFRA legislation, do not require further approval under Regulation (EC) 853/2004 to sell packed eggs direct to the final consumer from the farm gate.
- Egg producers not authorised by EMI as packing centres, (i.e. where eggs are not graded for weight or quality), can only supply eggs to the final consumer in quantities of less than 360 eggs (one full case) per week to be exempt from approval under 853/2004.

Eggs sold by the producer to local shops, restaurants or bakeries, must be graded as Class A, regardless of the quantity. This means the egg producer must be approved and authorised as a packing centre for this activity.

There does not appear to be any significant change to the guidance for “retail” and “composite products” for eggs.

APPENDIX 10

Project Report Form

Trading Standards Division - Report on Project Activity

**Title of Project: BETTER BANGERS & BETTER BREAD
SALT REDUCTION PROJECT**

Outline & background to project:

This year's project aimed to continue the work carried out with Derbyshire butchers and bakers to reduce the levels of salt in sausages and bread and in particular promoting the 'Better Bangers' and 'Better Bread' schemes.

Sausages

The aim of this project during 2011/ 12 was to reduce the amount of salt present in locally produced sausages. A survey carried out in 2011 by Consensus Action on Salt & Health (CASH), [Dangerous levels of salt found in Great British Bangers](#), revealed that the majority of sausages sold in supermarkets including branded sausages did not meet the Food Standards Agency's 2012 salt targets and a number did not meet the 2010 targets (now the Public Health Responsibility Deal targets). This survey also looked at other meat products such as burgers and kebabs as an area that could be explored. The British Meat Processors Association has produced [guidance for small businesses on reducing salt in meat products](#).

Bread

The aim of this project during 2011/12 was to focus on working with local bakers to assess and reduce the salt content in bread. The work was supported by a toolkit which was developed by LACORS and the FSA, which helped in the assessment of recipes and provided a standard approach to sampling and responses to common queries. The toolkit was developed in partnership with the National Master Bakers Association.

A survey carried out in 2011 by Consensus Action on Salt & Health (CASH), [Consumers advised to use their loaf when choosing bread](#), revealed that 1 in 4 loaves of bread contained as much salt per slice as a standard packet of crisps.

The main aim of this year's project was to promote the products, which met the 2010 or 2012 salt targets, from butchers and bakers that participated in the projects in 2011 and 2012 with a view to working with more businesses.

From the previous year's work, 13 bakers met the targets for at least one of their sampled products. A total of 24 products met one target or another, 16 met the 2012 targets and 8 meet the 2010 targets. One butcher met the 2012 target for four products and two butchers met the 2010 target for one product each. It is more straightforward to reduce salt in bread than in sausages. Reducing salt in sausages usually entails reducing the quantity of seasoning as well as switching to a different method of production.

It was decided that for particular sausages or bread deemed to meet either the 2010 or 2012 targets, analytical results and calculated results for salt content must be below the specific target and also the two results must correlate with each other.

The [FSAs 2010 and 2012 targets](#), renamed the Public Health Responsibility Deal targets lay down target levels for bread and sausages as follows:

	2010	2012
Bread	1.1 g salt per 100 g	1.0 g per 100 g
Sausages	1.4 g salt per 100 g	1.13 g salt per 100 g

Consideration was also to be given to the viability of working with butchers to reduce the levels of salt in other local produce such as burgers and kebabs.

Justification for project:

As a nation we currently consume an average of 8.1 grams of salt each day, whereas the recommended daily intake is only 6 grams a day; this is about a teaspoon of salt. Most people in the UK eat too much salt without even realising it. About 75% of the salt we eat is already in the food we buy with only a small amount added to our food at home.

Reducing the average intake down to the recommended daily amount could prevent 17,500 deaths each year. Professor Graham MacGregor, Chairman of Consensus Action on Salt and Health (CASH), has stated 'For every 1 gram of salt removed from our average daily intake, almost 7,000 lives could be saved each year and a further 7,000 non-fatal heart attacks and strokes could be prevented.'

According to Consensus Action on Salt and Health (CASH) bread is the largest source of salt in the British diet accounting on average for 20% of our daily intake and sausages are such a British favourite at mealtimes, that they are the third largest individual contributor of salt in the UK diet. Consequently, the reduction of salt in these foods should be a significant benefit to the public health.

A positive outcome of this project is that the local businesses involved can promote the reduction in salt in their products, which may attract new customers. The public are becoming increasingly aware of the negative impact of salt as a result of central government's on-going attempts to encourage consumers to make healthier choices with their food.

Further work is being undertaken by the Department of Health to cut levels of salt used in mass produced foods. If the targets are adopted by the larger manufacturers, smaller businesses could be left behind, with the public becoming increasingly aware of the negative effects of excessive salt

consumption. Furthermore, consumers can look at nutrition labels on prepacked foods to identify those which are lower in salt but fresh products from local butchers and bakeries have no nutritional labelling, meaning that people cannot tell how much salt they contain.

Activities Undertaken:

Promotion and Publicity

Working closely with colleagues in Public Relations, we designed four different certificates for display in butchers and bakeries. The certificates are for sausages and bread meeting the 2010 targets and those meeting the 2012 targets. The certificates are shown in [Appendix 1](#).

Product markers bearing the Better Bangers and Better Bread logos were designed for displaying with the products meeting the targets and are shown in [Appendix 2](#).

We also drew up declarations for butchers and bakers to sign. These are shown in [Appendix 3](#). To become a member of either the Better Bangers or Better Bread scheme and use the promotional material, a business must sign the declaration stating that it satisfies specified conditions in relation to recipes, production and clarity.

We visited all butchers and bakers whose products met the salt targets. The businesses confirmed that their production systems met the conditions set out in the declaration and signed to this effect.

The certificate and product markers were sent to participating butchers and bakers in August 2012.

Mr Johnson, the proprietor of The Bakehouse, Market Place, South Normanton, agreed to take part in some publicity for the scheme. Councillor Parkinson was involved in the publicity and was photographed handing the certificate over to the business. A press release was issued leading to articles in the local press, Workforce and the Departmental Newsletter. The press release, including the photograph is shown in [Appendix 4](#).

A brief write-up on the schemes was given to the Regeneration team. This was posted out with application forms for the 2012 Derbyshire Food and Drink awards.

Following the publicity, another baker showed an interest in the Better Bread scheme. His bread was found to meet the 2012 salt target and he demonstrated that his business fulfilled the conditions; therefore he was awarded the promotional material.

Information on the schemes and the businesses meeting the requirements are included on the Derbyshire County Council website [Salt reduction in sausages and bread](#).

Questionnaire

It was decided that we should evaluate the success of the schemes by way of a questionnaire and that a better response would be achieved if this was done by telephone. This exercise was conducted six months after the

promotional material was sent out. We managed to speak to 15 businesses. The questions put to the businesses are shown in [Appendix 5](#).

All but one business indicated that they were displaying the certificate and product markers. The other business had stopped making bread with the lower salt content.

Of the 14 businesses continuing to make products meeting one or other of the targets, all but one indicated that they had not received any comments from their customers in respect of the taste or other characteristics of their sausages or bread. The one baker who had received comments stated that they were in respect of his bread having a bland taste and not keeping as long. However, he had reduced the salt content considerably below the 2012 target.

All business said they could not say whether they had any new customers as a result of being part of the scheme.

Seven businesses were aware that their details were on the Derbyshire County Council website.

Five businesses, whose products met the 2010 target, indicated that they would like to reduce the salt content further to meet the 2012 target. Two businesses indicated that they might be interested in this.

Letter

Following the completion of the questionnaires, letters were sent to all butchers and bakers on the Flare database, that were not already members of either scheme. This letter included a number of the comments received from the questionnaire. The letter, which is shown at [Appendix 6](#), invited businesses to contact us if they were interested in joining either scheme.

Results

The feedback from the telephone questionnaire is included in the above section.

As a result of sending out the letters, three butchers and one baker have been in contact with us and we are now working with them to reduce the salt in their sausages and bread. Two of these businesses are confident that their products already meet the 2012 salt targets.

Conclusion:

By working with Derbyshire butchers and bakers we are protecting consumers who may unwittingly eat too much salt when purchasing sausages and bread, where fresh products are often sold without nutritional labelling. The businesses involved have been able to review and change the salt content in their products without compromising on their quality as well as advertising the reduction to their customers

The approach of working with local businesses and supporting them to meet the salt targets, whilst understanding the challenges faced, has developed the relationship between us and local businesses, as well as providing an opportunity to raise awareness of salt consumption with consumers.

The responses from the questionnaire indicate that most businesses remain positive about the schemes and are pleased that they can offer customers healthier options. They also indicated that because they had made gradual reductions in the levels of salt in their recipes, they had not received any comments from customers about any change in taste or other characteristics of the products.

It was decided to restrict the project to sausages and bread and not extend it to burgers and kebabs this year.

Those businesses, whose products meet the 2010 target, are generally keen on trying to reduce the salt content to 2012 levels.

Recommendations:

Along with working with businesses that are not already part of the schemes, we should help those businesses that want to further reduce the level of salt in their products to meet the 2012 target.

It is recommended that those businesses whose products currently meet either salt target should be visited for the purpose of resampling to ensure that their products still meet the targets.

The Better Bangers and Better Bread schemes should remain open to other Derbyshire butchers and bakers.

In March of this year the Department of Health published a new salt strategy under the Public Health Responsibility Deal to drive further progress to cut salt [Salt Strategy Beyond 2012](#)

The strategy comprises four key areas:

- revise the 2012 salt targets for over 80 categories of food by the end of the year to encourage companies to reformulate recipes
- push the catering and takeaway sector to do more – by setting new maximum targets for the most popular dishes like sandwiches and chips
- ask companies to help people choose lower salt options – through promotional and other activities
- get more companies across the food industry to sign up to salt reduction

The first key area could lead to new salt targets for sausages and bread. The development work for the new targets should be completed by the end of the year. We may have to review the work we are doing once this task has been finalised.

The recommendation for maximum per serving salt targets for caterers will form the first phase of this work. It is the first time caterers will be asked to meet targets based on the final served dish as it is eaten by the customer. It is anticipated that the targets will be published this summer. I suggest that we look at the feasibility of conducting some work in this area with regard to Derbyshire catering establishments.

We have a divisional priority:- "Percentage of selected Derbyshire food businesses operating in priority sectors to have been provided with best

practice guidance on reducing salt, sugar or fat content of locally produced Food". This could be achieved by providing targeted advice and assistance to those food businesses that are scheduled to be visited in the 2103/2014 Divisional service plan as part of the visit.

JW Trading Standards Officer

Date 3 May 2013



Name of sausage:

Produced by

Name of butchers:

**Meets Food Standards Agency
2010 Salt Target**

Date:

**DERBYSHIRE
County Council**
Improving life for local people

The 2010 Food Standards Agency Salt Target for Sausage is 1.4 g/100g.
The 2012 Department of Health Salt Target for Sausage is 1.13 g/100g.



Name of sausage:

Produced by

Name of butchers:

Meets Department of Health
2012 Salt Target

Date:

DERBYSHIRE
County Council
Improving life for local people

The 2010 Food Standards Agency Salt Target for Sausage is 1.4 g/100g.
The 2012 Department of Health Salt Target for Sausage is 1.13 g/100g.



Name of bread:

Produced by

Name of baker:

Meets Food Standards Agency
2010 Salt Target

Date:

ffi: \\DERBYSHIRE
County Council
Improving life for local people

The 2010 Food Standards Agency Salt Target for Bread is 1.1 g/1DOg.
The 2012 Department of Health Salt Target for Bread is 1.0 g/100g.



To become a member of this scheme and use the promotional material supplied to scheme members you must satisfy all the conditions listed below. If you satisfy these conditions please sign the declaration below and return it to us.

Accurate recipes: I have written down my sausage recipes accurately and supplied them to Trading Standards for assessment. *I have also supplied Trading Standards with up to date specifications for the seasoning mixes I use.

*Delete if not applicable.

Consistent production: I weigh out all the ingredients I use every time using accurate weighing equipment.

Clarity: I will make it clear to my customers which sausages meet the targets and will display my scheme certificate in a prominent place. I will only use the promotional material on the products specified in my scheme certificate and only in the premises detailed below.

Future: If I change any of my recipes in the future, I will remove the scheme logo until the recipe has been reassessed by Trading Standards.

I can confirm that the sausage making process I use meets all the conditions listed above.

Name and address(es) of business where the promotional material may be used:

Signed:



To become a member of this scheme and use the promotional material supplied to scheme members you must satisfy all the conditions listed below. If you satisfy these conditions please sign the declaration below and return it to us.

Accurate recipes: I have written down my bread recipes accurately and supplied them to Trading Standards for assessment. *I have also supplied Trading Standards with up to date specifications for the bread mixes/bread premixes I use.

*Delete if not applicable.

Consistent production: I weigh out all the ingredients I use every time using accurate weighing equipment.

Clarity: I will make it clear to my customers which bread meets the targets and will display my scheme certificate in a prominent place. I will only use the promotional material on the products specified in my scheme certificate and only in the premises detailed below.

Future: If I change any of my recipes in the future, I will remove the scheme logo until the recipe has been reassessed by Trading Standards.

I can confirm that the bread making process I use meets all the conditions listed above.

Name and address(es) of business where the promotional material may be used:

Signed:

Appendix 4

Drive to cut sausage and bread salt levels in healthy eating campaign

10 September 2012

Butchers and bakers are being encouraged to cut salt content in their products in our new healthy eating campaign.

We've launched our Better Bangers and Better Bread schemes to reduce the amount of salt in locally produced sausages and bread.

We're inviting Derbyshire butchers and bakers to volunteer their products to our trading standards officers for testing.

Products meeting the Government's Public Health Responsibility Deal targets qualify to display our new Better Bangers and Better Bread logos and a certificate. Details of participating businesses are also added to our website, giving consumers confidence in the quality of locally produced foods.

Councillor Kevin Parkinson, Cabinet Member for Regeneration, said:

"Eating too much salt can harm people's health so we are keen to encourage local food businesses to reduce it where possible.

"This initiative combines our trading standards and new public health roles to both improve healthy eating options and promote responsible local producers in our high streets." Councillor Parkinson added: "In Derbyshire we're blessed with some fantastic local butchers and bakers and we're delighted with the amount of early interest in our new scheme. "Business which have already cut salt levels tell us that customers haven't noticed a

difference in taste and they've benefitted from a reduction in production costs.

"I'm keen for national supermarkets trading in Derbyshire to get behind our healthy eating campaign and work towards achieving the same standards being created on our high streets. "Consumers know they can trust products displaying the Better Bangers or Better Bread logos to meet salt targets."

There are two levels of targets under the Public Health Responsibility Deal. For bread the

2010 target is 1.1g of salt per 100g and the 2012 target is 1g per 100g. For sausages the 2010 target is 1.4g per 100g, with the 2012 target 1.13g per 100g.

For more information about the Better Bangers and Better Bread schemes visit www.derbyshire.gov.uk/bb (opens in a new window) or call trading standards on

01629

536166.

Appendix 5

Telephone Questionnaire for Better Bangers and Better Bread Schemes

Make a note of which target the bread/sausages meet i.e. 2010/2012

Preferably ask to speak to the person who signed the declaration.

Explain that now the business has been part of the scheme for several months we want to ask a few questions about its effect, if any, on the business. Inform them that it will only take a few minutes.

Make a note of the person's name and position in business

Name of business

Address of business

Are they displaying the certificate and product markers? Yes/No

Have they had any feedback from customers particularly re:

- ☐ certificates/product markers on display
- ☐ change in taste or other characteristics of sausages/bread

Have they had any new customers as a result of being part of the scheme? Yes/No

If the bread/sausages meet the 2010 salt target, are they interested in working toward the 2012 target? Yes/No

Are they aware that their business details are on the DCC website? Yes/No

Have they any ideas for improvements of the scheme?

Have they any other comment on the scheme?

Martin Molloy OBE
Strategic Director
Cultural and Community Services

Robert Taylour
Head of Trading Standards
Trading Standards Division
Chatsworth Hall
Chesterfield Road
Matlock
Derbyshire DE4 3FW

Telephone	01629 539859
Ask for	Mrs J Wattret
Our ref	M/058637
Your ref	
Fax no	01629 536197
Date	

Dear Sir or Madam

RE: DERBYSHIRE BETTER BANGERS AND BETTER BREAD SCHEMES DEPARTMENT OF HEALTH RESPONSIBILITY DEAL SALT TARGETS

Derbyshire County Council Trading Standards has been working with butchers and bakers to assess and reduce the salt content of locally produced sausages and bread.

The Food Standards Agency's targets, which have been renamed the Public Health Responsibility Deal targets, lay down target levels for salt in sausages and bread. Information on these targets can be found on the Department of Health website at:

<https://www.wp.dh.gov.uk/responsibilitydeal/files/2012/01/Salt-Targets-for-Responsibility-Deal.pdf>

Those Derbyshire butchers and bakers that successfully meet the salt targets have been rewarded with promotional material bearing our scheme logo. Product markers bearing the logo have been supplied to all successful businesses for use on specified products. In addition, businesses are required to display a certificate where the markers are used.

To achieve the public health goal of consuming no more than 6g of salt per person per day necessitates action by food businesses.

It is recognised that salt has an important role to play in the flavour and preservation of sausages as well its use for technological purposes in bread. However, salt reduction is a priority for Government.

We have received positive feedback from butchers and bakers who are members of the scheme, as indicated by these examples:-
"It is a good scheme to work with and your people were very helpful"

“We reduced the salt gradually so our customers didn’t notice”

“Anything that improves the health of our customers is a good thing”

“It is good to show that our business is taking an interest in people’s health”

“We are labelling our bread as less than 1% salt and have had positive feedback as a result”

To become a member of either of our schemes and use the promotional material, a business must sign a declaration to the effect that it satisfies specified conditions in relation to recipes, production and clarity of the information displayed on its premises.

Businesses agreeing to take part will be given all the advice and assistance they need to reduce the salt in their sausages or bread.

Information on the schemes and details of those butchers and bakers meeting the requirements can be found on the Derbyshire County Council website at http://www.derbyshire.gov.uk/business/trading_standards/food_standards/salt_reduction/default.asp

If you are interested in taking part or would like more information, please contact Derbyshire Trading Standards on 01629 536166 and ask for Jane Wattret.

Yours sincerely



Jane Wattret
Trading Standards Officer - Standards & Animal Health
jane.wattret@derbyshire.gov.uk

