

# **FOOD SERVICE PLAN**

**2024-2025**



# FLINTSHIRE COUNTY COUNCIL

## FOOD SERVICE PLAN 2024-25

### INTRODUCTION

The Service Plan relates to the year commencing 1st April 2024 and ending 31st March 2025. It covers the service provision for the Food Safety, Food Standards and Animal Feed functions of Flintshire County Council.

The purpose of this Plan is to provide:

- Information about the scope of the Service
- Information about the services provided
- Information about the means of Service provision
- Information about performance of the Food Service against Performance Targets set out in the Plan
- Information relating to reviewing performance in order to address any variance from meeting the requirements of the Service Plan

Service Plans are usually produced annually to allow for meaningful review and progression, in accordance with the requirements of the Food Standards Agency (FSA) “Framework Agreement on Local Authority Food Law Enforcement” and the Food Law Code of Practice (Wales) July 2021.

In respect to Animal Feed, this function is delivered as part of the North Wales Regional Feed Enforcement Delivery Plan. This is funded by Food Standards Agency in Wales (FSA Wales) with all inspection and sampling targets being reviewed and set by FSA Wales.

For 2024-25, the service is planning to fully realign with the Food Law Code of Practice. As further endorsement of the level of realignment achieved, the Food Standards Agency in Wales have undertaken a targeted audit of the service in June 2024. At this time, the service was deemed to be making good progress on recovery and is taking a risk-based approach.

**FLINTSHIRE COUNTY COUNCIL  
FOOD SERVICE PLAN 2024-25**

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## 1.0 SERVICE AIMS AND OBJECTIVES

### 1.1 Aims and Objectives

The aims of the Food Service are to:

1. Promote, through education and enforcement, the sale and/or production of food which is fit and without risk to health.
2. Prevent and control the spread of food borne illness through education and enforcement.

These will be achieved by:

- (a) Providing a complete and holistic food law enforcement service covering the areas of food hygiene and safety, food standards and animal feed in accordance with relevant food legislation and Codes of Practice, fulfilling statutory obligations.
- (b) Providing a responsive service to demand driven elements such as food safety incidents, outbreaks of food related infectious disease, complaints and request for advice from both businesses and members of the public, in accordance with relevant statutory Codes of Practice
- (c) Assisting businesses to comply with all relevant legislation by using a balance of techniques and approaches to ensure the safety and well-being of the Public and of the environment in line with the Public Protection Enforcement Policy 2010.
- (d) Maintaining an up-to-date database of all food establishments in the County so that resources can be effectively defined and utilised to meet statutory, national and locally defined targets of inspection, sampling, specific initiatives and tasks set by FSA Wales, other agencies, or based on local need.
- (e) Providing an open and transparent Food Service with clear lines of communication for service users.

### 1.2 Links to Corporate Objectives and Plans

The objectives of the Food Service cut across a range of priorities within the Council Plan. It is particularly relevant to the Economy priority area, which includes a sub-priority of Business.

Details of the Plan are available on the Council's website.

The Food Service sits within the Community and Business Protection Service of the Planning, Environment and Economy Portfolio. Each Service area within Community and Business Protection writes annual Operational Action Plans, which have been informed by a range of external and internal drivers and through a greater focus on robust risk assessment, intelligence led intervention, targeting and performance management. All team members contribute to devising the Operational Action Plans for each Service Area. Food and Feed Law regulation is a statutory duty of the Council.

The following Service Improvement Data is also usually monitored and reported on within the Service Plan:

- (a) Food Safety inspections undertaken
- (b) Food Standards inspections undertaken
- (c) New Food Safety and Standards businesses inspected
- (e) Feed inspections carried out
- (f) New Feed businesses inspected

The Food Service will continue to implement performance management systems to improve the efficiency and effectiveness of service delivery in a meaningful way to the citizens of Flintshire.

From July 2021 to the end of March 2023, performance monitoring had focused on the performance of the service against the Food Standards Agency COVID-19 Local Authority Recovery Plan: guidance and advice to local authorities for the period from 1 July 2021 to 2023-24. This was to ensure resources were targeted where they added the greatest value in providing safeguards for public health and consumer protection in relation to food and to maintain the credibility of the Food Hygiene Rating Scheme. During 2023-24, the Food Hygiene and Food Standards service areas were working towards full realignment with the Food Law Code of Practice.

For 2024-25, performance will be monitored against the Food Law Code of Practice (Wales) July 2021 for those premises due inspection within this financial year and against Appendix 2 of this plan for Medium and Low risk premises that are overdue their inspection.

## 2.0 BACKGROUND

### 2.1 Authority Profile

Flintshire is a Unitary Authority of 43,464 hectares and a population of approximately 155,000 as per the 2021

Census. It is made up of a mixture of small towns and conurbations, particularly to the south, with rural and agricultural land is predominantly located in the north. The population is subjected to small seasonal fluctuations due to influx of tourists to the area. It has several industrial estates on which food manufacturers are located, as well as headquarters for several food manufacturers including one large national food retailer. The coastal edge of Flintshire County Council abuts the Dee Estuary upon which a cockle and mussel bed is situated. There is a small port located at Mostyn.

## 2.2 Organisational Structure

The Food Service sits in the Community and Business Protection Service within the Planning, Environment and Economy portfolio area. The responsibility of the Food and Feed service sits under the Team Manager – Food Safety and Food Standards, with the line management of most Feed officers being the responsibility of the Team Manager - Trading Standards Compliance and Animal Health. Feed officers also undertake other Trading Standards functions such as Animal Health. Both team managers' report to the Community and Business Protection Manager. The organisational structure of the Food and Feed Service is illustrated on the chart detailed in Appendix 1. Appendix 1 also includes the Management and Cabinet structure of the Council.

The Lead Officer for Food Safety is the Team Manager – Food Safety and Food Standards. The Lead Officer for Food Standards is the Specialist Trading Standards Officer (Food Standards) and the Lead Officer for Feed is Specialist Trading Standards Officer (Feed). Specialist services are provided by Public Health Wales and Public Analyst Scientific Services as the Public Analyst.

## 2.3 Scope of the Food Service

The scope of the service is detailed below:

### Food Safety

- Enforcement of food safety and food hygiene legislation in all food establishments in the County
- Registration of food businesses and / or approval
- Implementation of the Food Hygiene Rating (Wales) Act 2013
- Investigation of food complaints relating to fitness of food for human consumption; the nature, substance

or microbiological quality of the food, taking appropriate action as necessary

- Investigation of all complaints which relate to hygiene matters in food businesses
- Investigation of sporadic and suspected cases of food-related notifiable diseases
- Investigation and control of outbreaks of food poisoning and food-related notifiable diseases
- Respond to Food Alerts and food-related incidents
- Advice to food business, responses to plans, licensing and land charges referrals
- Providing relevant export attestations to businesses
- Act as Home and/or Originating Authority for other companies where necessary
- Undertake food sampling in accordance with the Sampling Programme
- Educational and promotional initiatives, when appropriate and based on local need

#### Food Standards

- Respond to requests for consumer advice regarding standards, labelling and composition
- Undertake a programme of visits to food premises within Flintshire
- Investigation of complaints relating to the nature, quality or substance of food and complaints relating to mislabelling of food, taking appropriate action as necessary
- Provide advice and guidance to food businesses
- Undertake food sampling in accordance with the Sampling Programme and in response to incidents
- Undertake promotional and educational initiatives, when appropriate
- Act as Home Authority and Originating Authority for food businesses within Flintshire, where necessary

#### Feed

- Undertake a pre-planned programme of visits to feed premises within Flintshire
- Undertake a programme of Feed sampling
- Provide advice, information and support to feed business operators, including manufacturers, distributors, and users of feed products
- Investigation of complaints relating to feedstuffs and complaint-based sampling of feed

## 2.4 Demands of the Food Service

The Service Delivery Point for the Food Safety, Food Standards and Feed Service is Ty Dewi Sant, Ewloe. For all of the above, the Service Delivery Points are usually open during normal office hours of 8.30 a.m. – 5.00 p.m. The service operates a hybrid working model for service delivery. The team provides a duty system to respond to reactive elements of the service.

There is no official “out of hours” provision. However, there is a call centre who will contact a team member should Food-related incidents be logged.

There are 1390 food premises in Flintshire. A full breakdown by activity type is provided below:

**Table 1: Breakdown of food premises in Flintshire by FSA activity type**

<b>Premises Type</b>	<b>Number</b>
Primary Producer	9
Supermarket / Hypermarket	37
Manufacturers / Processors	46
Retailer – Others	56
Importers / Exporters	1
Distributors / Transporters	53
Small Retailer	242
Restaurant / Café / Canteen	195
Hotel / Guest House	14
Pub Club	150
Takeaway	135
Caring Establishments	181
Schools / Colleges	87
Mobile Food Unit	45
Restaurant / Caterers – Other	138

There are 19 premises approved under Assimilated Regulation (EC) 853/2004 as they handle products of animal origin. This regulation places additional control measures and legislative requirements on these types of premises.

The types of food manufacturers within Flintshire vary greatly in the types of processes they use to produce food. These range from cooked meat and ready meal



manufacturers with national distribution, through to an on-farm milk pasteuriser supplying milk locally and shellfish dispatch centre. The diversity in the types of manufacturers operating within the County places a significant demand on the breadth and depth of knowledge required by officers within the Team.

### Dee Estuary and Shellfish

The Dee Estuary has one actively fished cockle bed falling within Flintshire's jurisdiction. The remaining beds fall within Wirral Council's jurisdiction. Regulation of the shellfish bed places significant demands on the Team, particularly during the cockle opening season. The bed has a Class A classification, meaning that cockle harvested from this bed during these months is considered safe to consume without any further processing and can be exported to the EU. The bed is due to be opened at the end of July to the end of September. A further biomass survey will be undertaken by Natural Resources Wales (NRW) in September to determine whether the bed will be open after September.

The management of the Dee accounts for a large portion of the Sampling Budget due to the statutory sampling of the water and shellfish for both microbiological classification and for algal biotoxin monitoring.

There are several companies operating as buyers, grading yards and / or collection points for cockle harvested elsewhere within the UK at different times throughout the year. There is also one approved Dispatch Centre under Assimilated (EC) Regulation 853/2004.

Enforcement on the Dee involves a cross-agency partnership working with NRW, Wirral Council, the Centre for Environment, Fisheries and Aquaculture Science (CEFAS), other Local Authorities, the North Western Inshore Fisheries and Conservation Authorities (NW IFCA) and FSA Wales.

There are approximately 50 licensed cockle gatherers for the Dee Estuary with a low number of endorsees. There are 12 businesses registered with fishing vessels also.

### Port Health

There is a port at Mostyn. The service has responsibility in relation to ships coming into port requiring a Ship Sanitation Certificate or a food hygiene inspection.

## Food Hygiene Rating (Wales) Act 2013 and associated legislation

Since 28th November 2013, the Food Hygiene Rating (Wales) Act 2013 mandated businesses with a food hygiene rating to display a valid food hygiene rating sticker. The administration of this Act accounts for a considerable volume of work for the Team. The introduction of the Food Hygiene Rating (Promotion of Food Hygiene Rating) (Wales) Regulations 2016, required takeaway food premises to provide a prescribed bi-lingual phrase on promotional literature which contains a price of the food and a method of ordering it remotely.

The Service is committed to delivering the requirements of the Food Hygiene Rating (Wales) Act 2013 and its associated regulations.

### Premises Profile

The premises profile, as defined in the Food Law Code of Practice (Wales) July 2021, is detailed in Table 2:

**Table 2: Breakdown of premises profile by risk band for Food Safety and Food Standards – May 2024**

FOOD STANDARDS			FOOD SAFETY			
Risk	Min.	No. of	Risk	Min.	No. of	
High - A	12 months	7	High	A	6 months	2
				B	12 months	19
Medium - B	2 years	369		C	18 months	338
Low - C	5 years	948	Medium	D	2 years	378
			Low	E	3 years	572
OUTSIDE		13		OUTSIDE		13
UNRATED		62		UNRATED		62
<b>TOTAL</b>		<b>1399*</b>		<b>TOTAL</b>		<b>1384*</b>

\*please note – data within the new database is being reviewed to check for any anomalies. Figures in Table 2 have been taken from the end of year return data.

### Feed

Under the Assimilated EU Feed Hygiene Regulation (183/2005), feed activities are clearly defined and are

broken down in to 'Approved' and 'Registered' feed activities. Activities requiring Approval include any activity involving the manufacture and/or placing on the market of feed additives with all such activities being classed as high risk. There are currently no businesses in Flintshire that have an Approval under the Regulations.

'Registered' feed activities are all other feed activities that are undertaken of which there are 14 registerable feed activities defined and coded by the FSA these are termed as 'R Codes' and run consecutively from R01 (the highest risk activity) through to R14 (the lowest risk activity).

**Table 3: Breakdown of Feed premises by activity type – Apr 24**

R01 - Manufacturer	3
R04 – Mobile Mixer	0
R05 – Distributor (including 1 Importer)	13
R06 – Pet Food Manufacturer	1
R07 – Supplier of Surplus Food	19
R08 - Transporter	4
R09 - Stores	1
R10 – On-farm mixer (Annex II)	3
R11 – On-farm mixer	32
R12 – Co-product producer	5
R13 – Livestock Farm	432
R14 – Arable Farm	4

The diversity in the types of Feed Businesses operating and activities being undertaken within the County places a significant demand on the breadth and depth of knowledge required by officers within the Team.

Following a review by FSA Wales in 2014 of the delivery of Animal Feeding Stuffs Enforcement across Wales, the system for risk assessing feed activities was simplified with all registerable feed activities across Wales being broken down in to one of two categories based on risk. These two categories are referred to as '*Above the Line*' and '*Below the Line*'. Above the line activities are high risk activities, which include businesses undertaking any 'Approved' feed activity and those engaged in 'Registered' feed activities involving production, processing, storage, transportation, sale of feed, or supply of food co-products, or surplus foods for use in animal feed and ultimately human consumption as part of the human food chain. These activities require a 'qualified' and 'competent' officer to inspect them.

Below the line activities are the low-risk activities that include premises that are feeding animal feed stuffs to livestock or growing straight feed crops that are to be consumed in their natural state such as silage. This applies to all of Flintshire's farms. These activities have a lower requirement for officers to be able to perform these activities, requiring that an officer be 'competent' to complete this work.

Since 1<sup>st</sup> April 2015, the number of inspections of feed premises has been determined by FSA Wales in the form of the 'North Wales Feed Enforcement Delivery Plan'.

The breakdown of the Feed premises profile is detailed below by risk band:

**Table 4: Breakdown of the premises profile by risk band for Feed.**

<b>FEEDINGSTUFFS</b>		
<b>Risk</b>	<b>Frequency of Inspection</b>	<b>Total no. of registered activities subject to inspection</b>
High	Every 3 years (as per Feed Law Code of Practice)	81
Low / Medium	Every 14 years (as per Feed Law Code of Practice)	436
<b>TOTAL inspectable registered activities</b>		<b>517</b>

The majority of food business owners are English speaking with a low requirement for written reports in Welsh. All advisory literature is produced bilingually in accordance with the Welsh Language Standards which came in to force on 30 March 2016. Approximately 14% of residents in Flintshire are recorded as Welsh speaking.

Approximately 4% of food businesses are of ethnic origin (Asian, Chinese, Turkish and Greek) and once again advisory literature is available in a range of ethnic languages to assist in understanding.

## 2.5 Regulation Policy

The Food Service undertakes enforcement in accordance with the Community and Business Protection Enforcement Policy which was approved by Members in

2010 and reviewed in 2020. This policy has been based upon the principles of the Enforcement Concordat adopted by Members in September 2000 and the Regulators Compliance Code. There is also a Food Safety and Food Standards Enforcement procedure which provides direction to officers in relation to their role.

There is an Enforcement Policy for residents, “Regulation and Enforcement – Involving Local Residents”, which was approved by Council in September 2011.

### 3.0 SERVICE DELIVERY

#### 3.1. Interventions at Food Establishments

The Food Service carries out inspections in accordance with pre-planned programmes drawn up annually and commencing on 1<sup>st</sup> April each year to coincide with the reporting requirements to FSA Wales. These inspection programmes are based on the risk rating of the premises.

The Food Law Code of Practice stipulates the type of inspection and intervention which can be applied at different risk bands of premises for both Food Hygiene and Food Standards. The corresponding Code of Practice gives the same direction in relation to Feed Interventions.

High risk premises must receive specific types of inspection. However, the Code of Practice allows for Alternative Enforcement Strategies (AES) to be applied to interventions at low-risk premises i.e. those that are risk band E for Food Hygiene or risk band C for Food Standards. The service uses AES questionnaires for this purpose.

#### Food Safety and Food Standards

For Food Hygiene Risk Bands A – C (High Risk), the team achieved 99% of inspections due. For the remaining 2 inspections that had not been completed, 1 of them had been subject to an intervention but could not be classed as an official control inspection for the purpose of the end of year return.

For Food Standards Risk Band A (High Risk), the team achieved 100% of inspections due.

As part of the move to realign with the Food Law Code of Practice, the service had prioritised interventions in Category D Food Hygiene and Category B Food

Standards premises (Medium Risk) over the lowest risk Category E Food Safety and Category C Food Standards premises (Low Risk). The service had also prioritised low risk Category C Food Standards premises that were due or overdue their Cat A – Category D Food Safety inspections.

For risk band Category D (Medium Risk) Hygiene premises, out of 292 inspections due or overdue, there were 156 outstanding by the end of March 2024 which gives a percentage of 47% of inspections achieved. For the low-risk Category E Food Hygiene interventions due or overdue, there were 203 interventions outstanding at the end of March 2024, which gives a percentage of 46% achieved.

For risk band Category B (Medium Risk) Food Standards premises, out of 199 inspections due or overdue, there were 76 inspections outstanding at the end of March 2024, which gives a percentage of inspections achieved of 62%. For Category C Food Standards, out of a total of 454 interventions due or overdue, there were 213 interventions outstanding at the end of March 2024, which gives a percentage of 53% achieved.

The service became aware of 209 new businesses during the year, of which 147 business received both a Food Hygiene and Food Standards inspection. By the end of March 2024, there were 30 businesses that were overdue their new business inspection by more than 28 days.

While the service had planned to realign fully with the Code of Practice, it was reliant on them being fully staffed throughout the year and the full effect on service delivery of moving to the new database provider was not known at the time of the previous service plan. During 2023/24, one officer left the service area to move to a new position – this left the team with a vacancy for four months. Two officers were also moved from completing programmed work to assist in the preparation and / or implementation of the new database for a significant period of time. Overall, while the service did not fully realign with the CoP during 2023-24, it made good progress which built on the significant work that had been done during 2022-23.

For 2024-25, the service is planning to fully realign with the Food Law Code of Practice. As further endorsement of the level of realignment achieved to date, the Food

Standards Agency in Wales have undertaken a targeted audit of the service in June 2024. At this time, the service was deemed to be making good progress on recovery and is taking a risk-based approach.

With regards to new businesses opening during the year, the service will prioritise those new businesses that undertake open food high risk food preparation but will also endeavour to inspect 90% of all of those businesses that begin to trade during the remainder of the year for both Food Hygiene and Food Standards.

The key objectives for the coming year in relation to programmed inspection and enforcement work are:

#### Food Safety

- Inspect all Category A – Category D Food Hygiene premises
- Inspect new businesses overdue from 2023-24
- Carry out prioritisation of new businesses we become aware of in 2024-25 and inspect 90% of those registering during the year
- Inspect those Category E food hygiene premises identified as requiring an inspection
- Carry out Alternative Enforcement Questionnaires at the remaining Category E risk band premises that are due this financial year or overdue by the end of March 2025
- To follow the requirements of the Food Hygiene Rating (Wales) Act 2013 and associated regulations
- To revisit all premises receiving a Food Hygiene Rating of 2 or lower to assess compliance, in line with the All Wales Revisit Policy
- To inspect any low-risk premises where local intelligence highlights a potential issue with compliance levels

#### Food Standards

- Undertake Food Standards inspections at all Category A – Category B premises due / overdue
- Inspect all those Category C food standards premises due their Category A – Category D Food Hygiene inspection
- Inspect new businesses overdue from 2023-24

- Carry out prioritisation of new businesses we become aware of in 2024-25 and inspect 90% of those registering throughout the year
- Inspect those Category C Food Standards premises identified as requiring an inspection
- Carry out Alternative Enforcement Questionnaires at the remaining Category C risk band premises that are due this financial year or overdue by the end of March 2025
- To revisit all premises with major non-compliance with Allergen Information requirements
- To inspect any Category C Standards premises where local intelligence highlights a potential issue with compliance levels

A full breakdown of premises programmed for inspection 2024-2025 by risk band is given in Appendix 2.

There were 24 revisits for Food Hygiene and Food Standards in 2023-24. The number of revisits may increase this year due to the increase in number of full inspections undertaken and due to a potential drop in compliance levels found in Category D Food Hygiene and Category B Food Standards premises.

### Feed

For 2023-24, the FSA-directed inspection programme allocated 82 inspections to Flintshire, 17 Above the Line, 65 Below the Line. For a fuller description of 'above the line' and 'below the line', please refer to pages 8-9. In total, the number of inspections achieved was 43 and 14 premises no longer trading, which gave 25 inspections outstanding. The target was not met due to a temporary reduction in staffing levels.

FSA Wales have reduced the funding available to the regional delivery model which impacts on the number of Below the Line inspections that will be completed in 2024-25. Risk assessment has been applied to prioritise inspections. All 10 of the Above the line inspections due have been prioritised for inspection. For Below the Line premises, 36 inspections have been prioritised based on:

- Farms that are not registered but are known to keep livestock by other information sources
- Farms that have registered for Feed but have not yet been inspected and farms we become aware of as trading within the coming year



- Farms that due their Feed inspection this year or overdue and are not members of a Farm Assurance Scheme

The full breakdown of these by the activity code is detailed in Table C in Appendix 2.

### 3.1.1 Additional Targeted Inspection/ Enforcement Activity

Additional targeted inspection and enforcement activity due to be undertaken is as follows:

- Shellfish – compliance assessment with the completion of registration documents
- Effective and professional liaison and co-operation relating to Primary Authority (PA) matters.
- Investigation of notified food safety related fraud incidents including referrals made anonymously.
- Issue of Ship Sanitation Certificates for incoming vessels to the Port of Mostyn.
- Appropriate response and liaison with other agencies for Civil Contingency matters.

### 3.1.2 Resources for Inspections and Additional Enforcement Activity

#### Food Safety and Food Standards

Food hygiene inspections will be undertaken by Environmental Health Officers (EHOs) and Food Safety Officers (FSOs). A full breakdown of resources is given in 4.2 – Staffing Allocation.

Food Standards work will be carried by the Specialist Trading Standards Officer (STSO), EHOs and FSOs.

Other areas of Trading Standards work within food premises such as Weights and Measures will be carried out by the STSO within the Food Safety and Food Standards Team. This places an absolute requirement for a fully competent Trading Standards Officer to be within the Team.

#### Feed

All aspects of Feed work will be carried out by 0.2 FTE fully qualified STSO and 0.4 FTE Trading Standards Enforcement Officers (TSEOs). This work is to be distributed across 7 officers - 5 of the Feed officers are based in the Trading Standards Compliance and Animal Health Team and 2 officers are based in the Food Safety

and Food Standards team.

### 3.2 Food/Feed Complaints

Food complaints cover the full range relating to fitness for human consumption, presence of extraneous matter in foods, microbial contamination and Food Standards issues such as food labelling, chemical adulteration and spoilage of food. It is the policy of the Food Service to investigate all food complaints reported including those made anonymously.

#### Food Safety and Food Standards

All food complaints are dealt with in accordance with the Food Law Code of Practice (Wales) July 2021, having regard to the Public Protection Enforcement Policy 2010.

Based on data for previous years, the estimated number of Food Safety and Food Standards complaints is between 120 and 140. This estimation does not include food complaints referred by other Local Authorities when acting as Home or Originating Authority.

#### Feed

All feed complaints will be dealt with in accordance with the Feed Law Code of Practice (Wales) 2014, having regard to the documented Public Protection Enforcement Policy 2010.

The number of Feed related complaints received by the service is low, typically no more than 3 a year.

### 3.3 Home Authority and Primary Authority

#### Food Safety and Food Standards

Flintshire County Council subscribes to both the Primary Authority and the Home Authority Principle. The Food Safety and Food Standards Service acts as both Home Authority and/or Originating Authority for approximately 50 food businesses. Flintshire is also committed to improving relationships with business and will continue to develop relationships with business and encourage effective business engagement at all times.

There is currently no Primary Authority (PA) partnership in place with any Flintshire-based business for either

Food Safety, Food Standards or Feed. However, as an Enforcing Authority, the team regularly liaises with local authorities who are a PA for a company in relation to inspections and / or complaints / sampling results.

### 3.4 Advice to Business

The policy of the Food Service is to provide a balanced approach between the provision of advice and enforcement activity. The Service is committed to providing an effective and responsive advice and assistance service, both during inspections or upon request, for all Flintshire businesses, including a service in accordance with the Regulatory Delivery Primary Authority Principle and the Local Government Regulation Home Authority Principle.

In addition, the Service provides advisory literature to businesses to assist them with compliance with relevant legislation.

#### Food Safety and Food Standards

To maximise the use of resources, advice is targeted as follows:

- During inspections and as part of follow up documentation
- Advice, information and guidance on request, including to new businesses
- Through guidance information available on the website and sign posting to the FSA's website
- Distribution of food safety and food standards material to food businesses, as required

Based on data from the last 3 years, the estimated number of requests for advice is anticipated to be approximately 220-250 in relation to Food Safety and Standards. Advice to businesses is provided by all members of the Team.

#### Feed

Flintshire is committed to supporting feed businesses and working with them to enable compliance with all regulatory and best practice standards, and to protect animal health and welfare, and the human food chain. In order to maximise the use of limited resources, advice is targeted as follows:

- During inspections and as part of follow up documentation
- Advice, information and guidance on request, including to new businesses
- Through sign posting to guidance information available on the Trading Standards Wales and FSA websites
- Distribution of relevant feed hygiene and standards material to feed businesses.

Based on last year's requests, it is anticipated that the service will receive 10-15 requests for advice from Feed businesses, outside of the advice provided as part of the programme of Feed inspections.

### 3.5 Food Sampling

#### Food Safety and Food Standards

Sampling will be carried out in accordance with the documented Sampling Policy for the Food Service which was referred for Member Approval in July 2001. The sampling programme is devised so that the procurement of samples will follow a risk-based approach. The programme takes in to account statutory requirements as well as the requirements of the FSA, the Welsh Food Microbiological Forum and local need.

Samples taken for Food Standards issues are submitted for analysis by the formally appointed and NAMAS accredited Public Analyst for the Council (and Agricultural Analyst for Animal Feed purposes) at Public Analyst Scientific Services, Valiant Way, Wolverhampton, WV9 5GB.

Samples taken as part of the Sampling Programme for Food Safety issues are submitted for microbiological examination by the designated and NAMAS accredited laboratory of Public Health Wales, Ysbyty Gwynedd, Penrhosgarnedd, Bangor. Each Local Authority is allocated sampling credits by Public Health Wales.

Reactive sampling as a result of a food complaint or during food poisoning investigations and sampling undertaking as part of an Infectious Disease incident or outbreak are sent to the laboratory at Ysbyty Gwynedd.

A member of the team attends the WFMF, which is responsible for devising Food Safety Sampling Surveys across Wales, based on risk assessment and intelligence

to target resources at particular foods or food poisoning organisms of concern within the UK. Samples are taken as part of programmed inspections at manufacturers and premises where product specific legislation applies.

The anticipated number of samples for Food Standards is approximately 25 including samples taken for labelling checks as planned sampling and from complaints.

There was no Regional Sampling project for Food Standards in 2023-24 as the region did not get confirmation from FSA Wales in sufficient time to run the sampling project. For 2024-25, there is a proposed regional sampling project, which will be reliant on grant funding from FSA Wales.

Samples will be taken as part of programmed inspections at manufacturers, approved premises and premises where product-specific legislation applies for analysis.

For Food Safety, there will be statutory sampling for shellfish classification, biotoxin monitoring, WFMF Surveys and in response to any serious food complaints / hygiene concerns. The anticipated number of samples for Food Microbiological examination is around 60 samples including the shellfish sampling.

#### Feed

There will be a minimal amount of sampling work undertaken by Flintshire officers in relation to Feed as this is prioritised and funded on a regional basis. Other than sampling directly funded by FSA Wales, any other feed samples taken during 2024-25 will only be done in response to complaints received or feed safety incidents.

### 3.6 Food/Feed Safety Incidents

#### Food Safety and Food Standards

Food Alerts will be initiated and responded to in accordance the Food Law Code of Practice. The contact details for the Team and relevant Agencies (including out of hour's contacts) will be kept up to date. The resource implication of this function depends upon the category of Food Alert and the extent of businesses affected within Flintshire. There were 13 food incidents during 2023-24. From previous data, we anticipate we will be involved in 8 to 14 food incidents during 2024-25.

## Feed

Alerts will be initiated and responded to in accordance with the Feed Law Code of Practice (Wales) 2014. Responses to Feed Alerts will be kept in a centralised documented format and the contact details for the Team and relevant Agencies (including out of hour's contacts) will be kept up to date. It is difficult to quantify the resource implication of this function as it depends upon the nature of the Feed Alert and the source, type, quantity and distribution of feed product involved.

### 3.7 Liaison with Other Organisations

The Food Service is committed to ensuring effective liaison with other relevant organisations to enforce consistency of approach. This includes liaison with:

- FSA Wales, NRW, CEFAS and Public Health Wales (PHW)
- Professional bodies such as Chartered Institute of Environmental Health (CIEH), Chartered Trading Standards Institute (CTSI)
- Other Local Authorities
- Relevant local and regional bodies such as the Dee Estuary Cockle Fishery Advisory Group and North Wales and Wirral Shellfish Liaison Group
- Liaison with regional and national panels including the All Wales Food Safety and Communicable Disease Expert Groups, WFMF, Food Hygiene Rating Steering Group and North Wales Food and Communicable Disease Task Group
- Relevant service areas within Flintshire County Council such a Planning and Licensing

The Food Team have monthly Team Meetings. There is also a weekly management meeting for Team Managers and the Service Manager.

The Feed element of the service is committed to ensuring effective liaison with partners and other relevant organisations to ensure consistency of approach. This includes liaison with:

- FSA Wales, Veterinary Medicines Directorate (VMD), Animal and Plant Health Agency (APHA)
- Professional bodies such as CTSI, National Trading Standards (NTS) and the Association of Chief Trading Standards Officers (ACTSO).

- Other Local Authorities across Wales and the UK
- Partner Local Authorities in the North Wales Feed Enforcement Delivery Plan (Wrexham, Denbighshire, Conwy, Gwynedd, Anglesey)
- Liaison with regional and national panels including the joint Trading Standards Wales/FSA Feed Working Group, Trading Standards Wales and UK Animal Health and Welfare Panels

Officers who deliver the Feed service have regular meetings with the Team Manager – Food Safety and Food Standards and one to ones with their line manager.

### 3.8 Food Safety and Standards Promotional Work

Educational and promotional activities are important components of a comprehensive Food Service.

#### Food Safety and Food Standards

During 2023-24, advice was provided to business during inspections, sampling, complaint investigations and Alternative Enforcement questionnaire completion. Guidance was sent to food and drink exhibitors at Mold Food and Drink Festival as well as providing face-to-face advice to businesses at the event.

For 2024-25, we are proposing to undertake promotional work as part of the North Wales Food Standards sampling project on American Imported Confectionary and Drinks.

#### Feed

Officers provide advice and guidance on compliance with legal and best practice standards during inspections and when carrying out routine animal health and welfare and disease control work. Promotion work is usually done as part of routine inspection or in response to enquiries made by business to the service.

### 3.9 Control and Investigation of Outbreaks and Food Related Infectious Disease

Investigation and control of food-related infectious disease is in line with the Communicable Disease Outbreak Plan for Wales, which was approved by Members in 2011. The plan was revised by Public Health Wales in conjunction with partners including local authorities and published in January 2024.

Investigations of sporadic notifications of food related infections disease follow documented procedures. It is estimated there will be approximately 330 - 350 cases of sporadic notifications and between 0 and 10 outbreaks. Public Health Wales have introduced molecular testing of faecal samples of suspected cases and this has resulted in an increase in the number of positive cases detected for specific organisms.

*Campylobacter* was the highest incidence of food-borne illness for 2023-2024 in Flintshire and account for approximately 74% of cases. Cases of *Campylobacter* were sent a questionnaire to complete which, when returned to the service, was reviewed by a competent officer to assess for any food-related risk factors.

Outbreaks are characteristically resource intensive but do not follow an annual trend, therefore the anticipated burden on staffing cannot be predicted. Should they occur the impact on resources cannot be over-estimated and would require rapid contingency planning for maintaining the delivery of the rest of the Service.

## 4.0 RESOURCES

### 4.1 Financial Allocation

The financial allocation for the Food Service is split between budgets provided for the Food Safety and Food Standards and for Animal Health. The expected overall level of expenditure providing the Food Safety and Food Standards Service for 2024-25 is detailed in Table 5.

**Table 5: Expected Overall Budget for the Food Safety and Food Standards Team 2024-2025**

COST ITEM	FINANCIAL ALLOCATION
(a) Staffing (total staff costs)	£642,738
(b) Travel (mileage and rail warrants)	£4,127
(c) Equipment	£3,460
(d) Sampling	£4,177
(e) Shellfish Sampling	£10,000
(f) Support Costs for Printing and Translation	£1,150
(g) Training	Centrally held budget.



The Food Sampling budget covers Food Safety and Food Standards. This is in addition to the allocation provided by Public Health Wales. Additional funding can be made available should there be an incident. There is an income target of £8,712 which is generated by Food Hygiene re-rating inspections, Export Health Attestations and Ship Sanitation Inspections.

Table 6 shows the expected overall level of expenditure for Feed Service delivery:

**Table 6: Expected Budget for the Feed Service Delivery 2024-25**

<b>COST ITEM</b>	<b>FINANCIAL ALLOCATION</b>
(a) Staffing (total staff costs )	£30,494
(b) Travel (including mileages and Subsistence	£891
(c) Equipment	£500.00
(d) Sampling	Budget is held Regionally
(e) Training	Centrally held budget

#### 4.2 Staffing Allocation

The Food Safety and Food Standards team consists of the Team Manager – Food Safety and Food Standards 1.0 FTE, 6.5 FTE Environmental Health Officers (EHOs), 3.0 FTE Food Safety Officers (FSOs), 1.0 FTE Specialist Trading Standards Officer – Food Standards (STSO) and 1.0 FTE Trading Standards Enforcement Officer (TSEO). The Team Manager – Food Safety and Food Standards is the Lead Officer for Food Safety and the STSO is the Lead Officer for Food Standards, both of which are designations required by the Food Law Code of Practice.

EHOs and FSOs undertake both Hygiene and Standards work. The STSO undertakes Food Standards, Feed and other TS duties in Food premises. The TSEO does not undertake any Food Safety or Food Standards duties – they undertake Animal Health, Feed and other TS duties in non-food businesses.

For part of 2023/24 and 2024/25, there has also been a fixed-term Trainee EHO position which has been funded by the FCC Modern Trainee scheme. This post finishes as of September 2024.

Administrative support is provided by 1.0 FTE Administration Officer which sits within the Planning, Environment and Economy portfolio.

All EHOs in post are qualified and registered with the Environmental Health Registration Board or subsequent requirements. All of the FSOs hold the Higher Certificate in Food Control. All officers are qualified in HACCP Principles (Hazard Analysis Critical Control Points).

Officers are authorised appropriately for the duties they perform. Two of the EHOs are at a level of authorisation which does not allow them to serve Hygiene Emergency Prohibition Notices or seize and detain food. They are due to be assessed against the competency framework during the year for their authorisation being increased.

The STSO – Food Standards holds the Diploma in Trading Standards and has also successfully completed the five-day QMS Auditor/Lead Auditor training course.

The breakdown of resources required to deliver the Food Safety and Food Standards service is given below:

**Table 7: Full Breakdown of Resources by Full Time Equivalent (FTE) to Deliver the Food Safety and Food Standards Service**

<b>Intervention Type</b>	<b>Food Safety FTE</b>	<b>Food Standards FTE</b>
Inspections	4.2	3.2
Revisits	0.1	0.1
Complaints and Food Incidents	0.4	0.1
Primary Authority	0.0	0.0
Food Business advice/promotion/ other Non-Official Controls Interventions	0.6	0.1
Communicable Disease	1.4	N/A
Sampling	0.2	0.2
Service Management / Technical Support / Regional Liaison	1.2	
<b>TOTAL FTE</b>	<b>11.8*</b>	

\*the 0.3FTE gap has been filled by a Trainee EHO, who is due to leave their post at the end of August 2024.

The inspection resource requirement is based on completing the majority of inspections as joint inspections i.e. the officer does both a Food Safety and Food Standards inspection during the same visit. This flexibility is key to ensuring the service can be delivered based on current resources.

### Feed

All aspects of Feed work will be carried out by seven individual officers who sit in either the Food Safety and Food Standards team or the Compliance and Animal Health team within the Community and Business Protection service. The overall management of the Feed service area is the responsibility of the Team Manager – Food Safety and Food Standards. The Lead Officer for Feed is currently provided by the Team Manager – Trading Standards Compliance and Animal Health.

All officers involved in the delivery of the feed service also undertake other duties which are non-Feed related. The Feed component of their roles for this year equates to 0.2 FTE Specialist Trading Standards Officer and 0.4 FTE Trading Standards Enforcement Officer.

The STSO – Food Standards satisfies all of the criteria to be deemed ‘qualified’ and ‘competent’ to undertake the full breadth of Feed interventions. At the time of writing, the STSO in the Trading Standards Compliance and Animal Health team is vacant and is going through the recruitment process.

Four of the TSEOs satisfy the ‘competency’ criteria based on experience and training that enables them to perform Below the Line Feed work on Livestock and Arable Farms. A further TSEO is due to commence their Feed portfolio in 2025/26 which will enable them to undertake both Above and Below the Line inspections. Until this time, they are undertaking a supported programme of work that will enable them to undertake Below the Line inspections during 2024/25.

### 4.3 Staff Development Plan

During the forthcoming year the following training is planned:

- (i) Support of national and regional seminars on relevant subject matters.

(ii) In-house training sessions

Each member of the Team will receive the required twenty hours Continuing Professional Development as required by the Food Law Code of Practice (Wales) July 2021 (or thirty hours for officers with Chartered Status). Staff will be subject to annual Staff Appraisals in line with the Corporate policy with a mid-year review which identifies and tracks training and development needs. All staff have monthly one to ones with the Team Manager to identify and monitor areas requiring development.

All officers achieved the required CPD during 2023-24 and they are fully supported to achieve this for 2024-25.

Feed

All authorised officers will take part in training to ensure they meet the CPD requirements for Feed during 2024-25. All feed training is provided regionally across Wales as part of the North Wales Regional Feed Enforcement Delivery Plan that is funded by FSA.

## 5.0 QUALITY ASSESSMENT

### 5.1 Quality Assessment and Internal Monitoring

#### Food Safety and Food Standards

Within the Food Service, quality systems are in place to ensure that work is completed and checked by a competent person in line with the fully documented Internal Monitoring Procedures. Documented procedures and work instructions exist to ensure consistency of approach with various computer report mechanisms to check accuracy on the Placis Database. Work Instructions are provided on key areas of work retained within formal Procedure Manuals.

The Team Manager sits on the North Wales Food and Communicable Disease Task Group, the All Wales Food Safety Expert Group and the All Wales Communicable Disease Expert Group. The STSO – Food Standards also sits on the North Wales Food and Communicable Disease Task Group. These forums offer the opportunity to discuss a wide range of quality issues relevant to Food Law Enforcement and Food Hygiene incidents and outbreaks.

The service completed and returned End of Year Return questionnaires to the FSA which assessed the service's

performance against the FSA-priorities during 2023-24 for Food Hygiene, Food Standards and Feed.

During 2023-24, internal training sessions were held as a result of the Internal Monitoring undertaken. As a result of this training, further training on completion of inspection records was also provided.

### Feed

Quality systems are also in place to ensure that work is completed and checked by a competent person in line with the fully documented Quality Monitoring Procedures. Documented procedures and work instructions exist to ensure consistency of approach with various computer report mechanisms to check accuracy on the database.

In addition, for the whole Food service, external audits including focused audits, are undertaken by FSA Wales (frequency determined by FSA). The last audit was a targeted audit of the Food Safety and Food Standards service areas in June 2024.

The North Wales Regional Feed Delivery was audited by FSA Wales in November 2019. This audit did not involve FCC directly as two other North Wales were selected.

## 6.0 REVIEW PROCESS

### 6.1 Review Against the Service Plan

The Service Plan is subject to annual review. Performance against this Service Plan is monitored by:

- Monthly team meetings
- Monthly one to ones with individual team members
- Informal team briefings held on a regular basis
- Quarterly Feed returns to the regional Feed officer

The FSA require two returns per year for the Food Hygiene and Food Standards elements of the service; one as a six-monthly return and one as year-end.

Appendix 3 provides full quantitative analysis of service delivery during 2023-24.

As overarching achievements:

- 99% of Category A - Category C Hygiene inspections were completed
- 100% of Category A Food Standards inspections

were completed

- The team dealt with 13 Food Incidents
- The move to the new database supplier in October 2023

A review of progress with the programme of inspections was undertaken early in Quarter 4 as to the effect of the implementation of the new database on service delivery. As a result of this review, the programme was amended and a team member was removed from programmed work and reactive work to work fully on the new database implementation.

## 6.2 Identification of Any Variation from the Service Plan

The main areas where the service deviated from the Service Plan for 2023-24 were:

- A fewer number of inspections of Category D Food Hygiene premises were undertaken than were due / overdue
- A fewer number of Category B Food Standards inspections were completed than were due / overdue
- The number of Below the Line Feed inspections undertaken was lower than programmed

For Food Safety and Food Standards, the targets not met were due to the team being 1.0FTE down for a proportion of the year and due to the introduction of the new database which has impacted considerably on service delivery.

For Feed, the officer resource available was impacted for a significant proportion of the year due to other priorities on vapes and due to staff absence for part of the year.

## 6.3 Key Areas of Improvement / Development

The main areas for improvement or further development are:

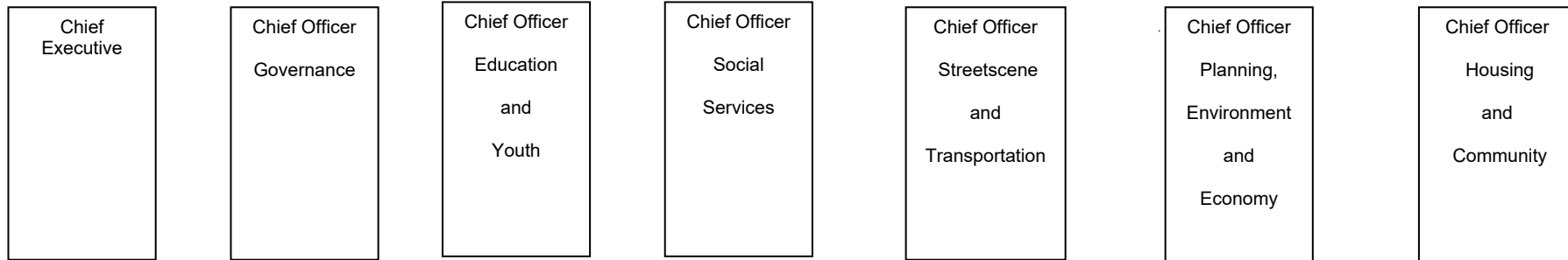
- To inspect all overdue new businesses which had been prioritised for inspection
- To inspect the overdue Category D premises by the end of Quarter 3
- To undertake AES interventions at the overdue Cat E Food Hygiene inspection
- To complete the overdue Category B Food

#### 6.4 Forthcoming Considerations

##### Standards inspections

- To achieve the inspection of all Feed premises that are Below the Line, funded by the regional model
  - To register those Feed businesses that have previously not registered with the service
  - To improve the accuracy of the database in relation to Feed
  - To devise and follow a schedule for updating all relevant processes, procedures and documentation to reflect the changes due to the implementation of the new database
- 
- While the FSA have directed LAs to return to service delivery as per the Code of Practice, the backlog of lower risk premises inspections is such that the intervention frequency cannot be undertaken within 28 days of the inspection due date. The impact of this backlog on service delivery as per the code will continue for the coming year. The prioritisation of interventions will be done based on risk and on any relevant information
  - Further consultation is expected in 2024-25 on the outcome of the pilot on the new Food Standards Delivery Model as part of the FSA's Achieving Business Compliance programme
  - The service is in the process of signing up to the FSA's Register a Food Business platform which will streamline the food business registration process
  - The Food Safety and Food Standards service has been audited by FSA Wales in June 2024. The recommendations resulting from this audit and the corresponding Action Plan will be progressed
  - FSA Wales are continuing with a requirement for all LAs in Wales to submit six-monthly data collection, which they commenced during the COVID-pandemic. This places an additional burden on LAs to prepare this data twice yearly

# FLINTSHIRE COUNTY COUNCIL - ORGANISATIONAL STRUCTURE





**APPENDIX 1**

Chart 2

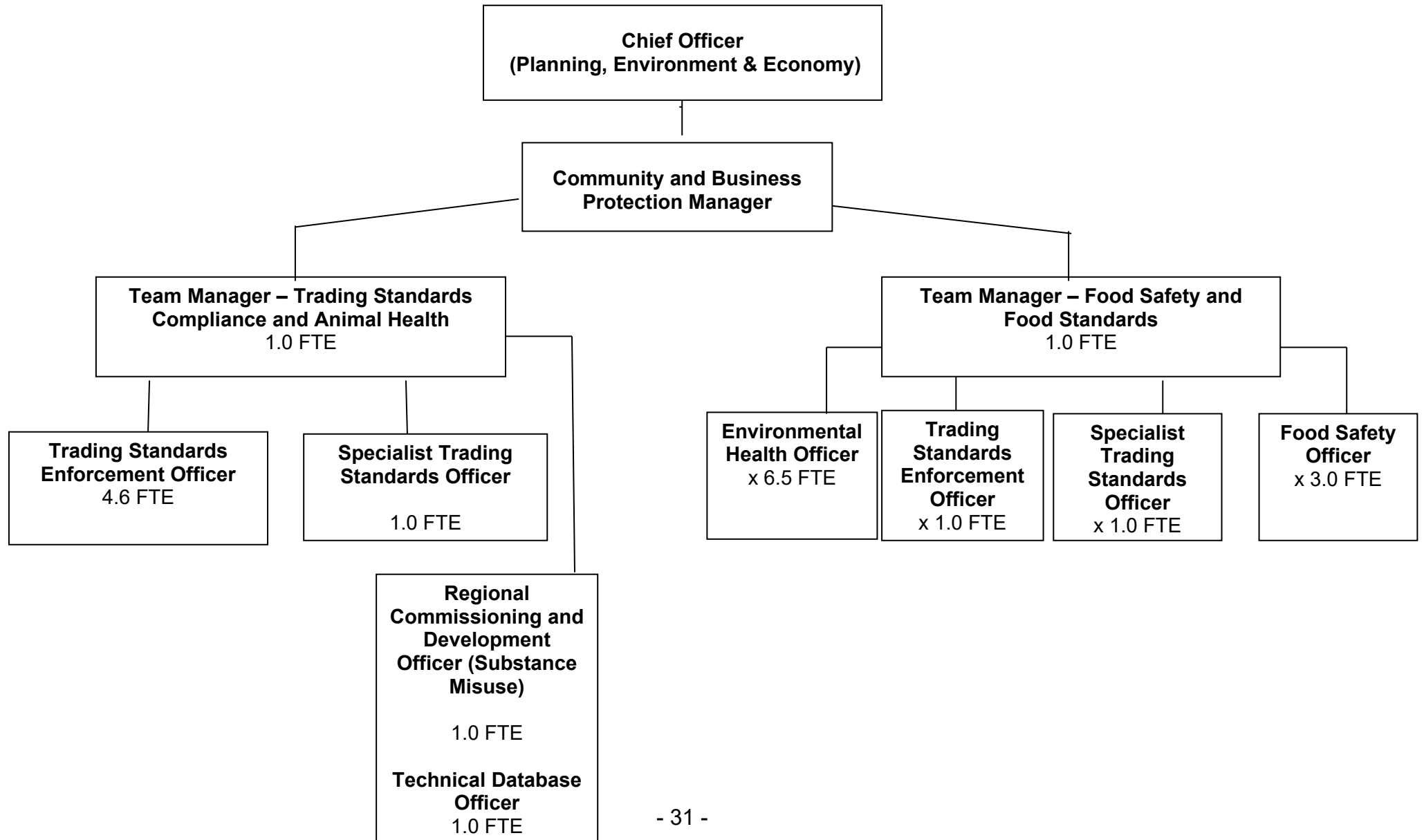
**FLINTSHIRE COUNTY COUNCIL – COMMITTEE STRUCTURE**

Please refer to the Flintshire County Council website for a current Committee structure:

<https://committeemeetings.flintshire.gov.uk/mgListCommittees.aspx?bcr=1>

Chart 3

# COMMUNITY AND BUSINESS PROTECTION - FOOD AND FEED SERVICE



**APPENDIX 2**

**Table A - breakdown of the profile of programmed Food Safety inspections for 2024-25 by Risk Rating:**

<b>PROGRAMMED INSPECTIONS - FOOD HYGIENE</b>		
<b>Risk</b>	<b>Number Due in Year</b>	<b>Number Outstanding from 2023-24</b>
A	2	0
B	18	0
C	220	2
D	105	156
E	83 (6* )	203 (48*)
New Businesses from previous year	N/A	54
<b>SUB-TOTAL</b>	351 inspections / 77 AES questionnaires	260 inspections / 155 AES questionnaires
<b>TOTAL</b>	<b>611 inspections / 232 AES questionnaires</b>	

**Table B - breakdown of the profile of programmed Food Standards inspections for 2024-25 by Risk Rating:**

<b>PROGRAMMED INSPECTIONS - FOOD STANDARDS</b>		
<b>Risk</b>	<b>Number Due</b>	<b>Number Outstanding from 2023-24</b>
A	3	0
B	174	76
C	72 (30*)	213 (123*)
New Businesses from previous year	N/A	54
<b>SUB-TOTAL</b>	207 inspections / 42 AES questionnaires	253 inspections / 90 AES questionnaires
<b>TOTAL</b>	<b>460 inspections / 132 AES questionnaires</b>	

The Risk Rating is determined in accordance with the Food Law Code of Practice. For Food Safety High Risk premises are those with a Risk Rating of A - C. For Food Standards High Risk premises are those with a Risk Rating of A.

The tables do not include the number of new businesses that we anticipate we will become aware of during the year.

\*denotes the number of physical inspections that have been programmed. The remaining number of premises will be completed as an Alternative Enforcement Strategy (AES) questionnaire.

**Table C - breakdown of the profile of programmed Feed inspections for 2024-25 by Feed Business Activity:**

	<b>PROGRAMMED INSPECTIONS - FEED</b>	
<b>High Risk (ATL)/Low Risk (BTL)</b>	<b>Registered/Approved Feed Business Activity</b>	<b>Number Due</b>
High Risk – R01-4	Manufacturer of Feed	2
High Risk – R12	Co Product Producers	1
High Risk – R09	Feed Stores	0
High Risk – R05	Feed Distributor	5
High Risk – R08	Feed Transporter	0
High Risk – R10 and R11	On Farm Feed Mixers	1
High Risk – R07	Supplier of Surplus Food	1
High Risk – R06	Pet Food Manufacturer	0
Low Risk – R13	Livestock Farms	36
Low Risk – R14	Arable Farms	0
	<b>Total</b>	<b>46</b>

## APPENDIX 3 – PERFORMANCE 2023-24

### Food Safety

<b>Risk</b>	<b>Interventions Due</b>	<b>No. outstanding at 1<sup>st</sup> Apr 2024</b>	<b>% Achieved</b>
A High Risk	3	0	100
B High Risk	28	0	100
C High Risk	164	2	99
D Medium Risk	292	156	47
E Low Risk	376 (344 as AES)	203	46
Unrated at 1 <sup>st</sup> Apr 2023	52	2	96

### Food Standards

<b>Risk</b>	<b>Interventions Due</b>	<b>No. outstanding at 1<sup>st</sup> Apr 2024</b>	<b>% Achieved</b>
A High	7	0	100
B Medium	199	76	62
C Low	454 (422 as AES)	213	53
Unrated at 1 <sup>st</sup> Apr 2023	54	2	96

Feed Inspections (as per requirements of FSA Regional Funding Model 2023-24)

<b>Risk</b>	<b>Programmed</b>	<b>No. outstanding at 1<sup>st</sup> Apr 2024</b>	<b>% Achieved</b>
High	17	1	94
Medium/Low	65	24	63
<b>TOTAL</b>	<b>82</b>	<b>39</b>	<b>52</b>

**Food Hygiene Ratings**

Profile of Ratings within Flintshire: July 2024

	<b>5</b>	<b>4</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>0</b>
	Very Good	Good	Generally Satisfactory	Improvement Necessary	Major Improvement Necessary	Urgent Improvement Necessary
% of Premises	85.5	11.7	1.5	0.5	0.8	0.0

Food Hygiene Rating Safeguards 2023/24

Number of Requests for Rescore Visit to be undertaken	-	16
Number of Appeals on Rating	-	0
Number of Fixed Penalty Notices	-	0
Right to Reply	-	0

## **Other data in relation to Demands on Food Service**

### Food and Feeding Stuffs Complaints

Food Safety number of complaints	-	109
Food Standards number of complaints	-	19
Feed number of complaints	-	1
Food Incidents	-	13
Feed Incidents	-	0

### Advice to Business

Food Safety	-	240 requests for advice
Food Standards	-	6 requests for advice
Feed	-	13 requests for advice

### Food and Feed Sampling

Food Safety	-	64 plus 9 Shellfish Classification samples
Food Standards	-	10 samples – monitoring for composition and labelling
Feed	-	0

### Control and Investigation of Outbreaks and Food Related Infectious Disease (Food Safety only)

Sporadic Notifications	-	341 (of which 254 were Campylobacter)
Outbreaks	-	0 Incidents or Outbreaks declared

### **Other Types of Service Requests (Food Safety only)**

<u>Water Disconnections</u>	-	10
<u>Ship Sanitation Certificates</u>	-	0
<u>Export Health Attestations</u>	-	82
<u>Shellfish Registration Document Requests</u>	-	11