

Our Food 2022: Keeping it clean

In this chapter, we will consider whether enforcement activity is returning to normal levels after the pandemic, and also look at the fundamental question of resourcing and capacity.

Hygiene standards in food and feed establishments

At a glance

In this chapter, we look at:

- the levels of compliance with hygiene standards across food and feed establishments
- the progress made in restoring food hygiene controls following the COVID-19 pandemic
- the staffing capacity available to uphold food hygiene standards

Introduction

As consumers, we all want to feel confident that the food we eat has been produced in a safe and hygienic way. But achieving this involves a huge effort across the food chain to ensure standards are maintained.

All food and feed businesses are responsible for meeting strict hygiene requirements, which include proper handling, storage and transportation of food and feed, as well as the use of safe ingredients, effective hygiene practices and making sure staff receive adequate training or supervision.

The responsibility for ensuring all businesses follow these rules spans multiple organisations and varies across the UK (figure 20). As we described in last year's report, the pandemic severely affected their ability to operate in the normal way. The data in this chapter partly reflects the ongoing efforts to resume the full delivery of hygiene controls and secure a more reliable picture of compliance. However, the ability of enforcement authorities to deliver robust controls also depends upon the funding and supply of sufficiently trained professionals to uphold our food laws.

In this chapter, we will consider whether enforcement activity is returning to normal levels after the pandemic, and also look at the fundamental question of resourcing and capacity. We examine how the size and shape of this workforce has changed over time and whether it is sufficient to keep consumers safe for the future.

Figure 20: Responsibilities for maintaining food hygiene controls across the UK

Type of food establishment	Which authority is responsible for hygiene controls?	Which professionals are involved in the inspection process?
Food businesses: these include restaurants, cafés, pubs, supermarkets and other places where food is supplied, sold or consumed, such as hospitals, schools and care homes.	UK-wide local authorities	Food safety officers/ Food Law officers (in Scotland), including Environmental Health Officers

Type of food establishment	Which authority is responsible for hygiene controls?	Which professionals are involved in the inspection process?
Meat establishments: these include abattoirs, cutting plants, game handling establishments and meat markets.	England and Wales: FSA and local authorities Scotland: FSS Northern Ireland: Department of Agriculture, Environment and Rural Affairs (DAERA)	Official Veterinarians (OVs) and Meat Hygiene Inspectors (MHIs)
Dairy establishments: these include farms and production plants manufacturing dairy products.	England and Wales: FSA Scotland: local authorities Northern Ireland: DAERA	Dairy Inspectors, Environmental Health Officers (in Scotland)
Animal feed establishments: these include wholesale suppliers and manufacturers of animal feed products.	England and Wales: local authorities Scotland: FSS Northern Ireland: DAERA	Feed Officers

Hygiene in food establishments

There are two national food hygiene ratings schemes operating across the UK: the FHRs which operates in England, Wales and Northern Ireland; and the FHIS which covers food businesses in Scotland. Both draw on the most recent inspections carried out by local authorities and are given to businesses involved in serving and preparing food, including restaurants, pubs, cafés, takeaway outlets, and canteens, as well as other places where food is supplied, sold, or consumed like hospitals, schools, and care homes ([footnote 1](#)).

Food hygiene inspection data gathered on 31 December 2022, showing the most recent inspection results, indicates that more than nine out of ten food businesses achieved satisfactory or better ratings ([footnote 2](#)), with minimal changes reported compared to last year's ratings. Just over three-quarters (75.7%) of food businesses in England, Wales and Northern Ireland achieved a top rating of 5 for hygiene, while 2.9% of food establishments scored 2 or below, which means they require improvement, major improvement or urgent improvement (figure 21).

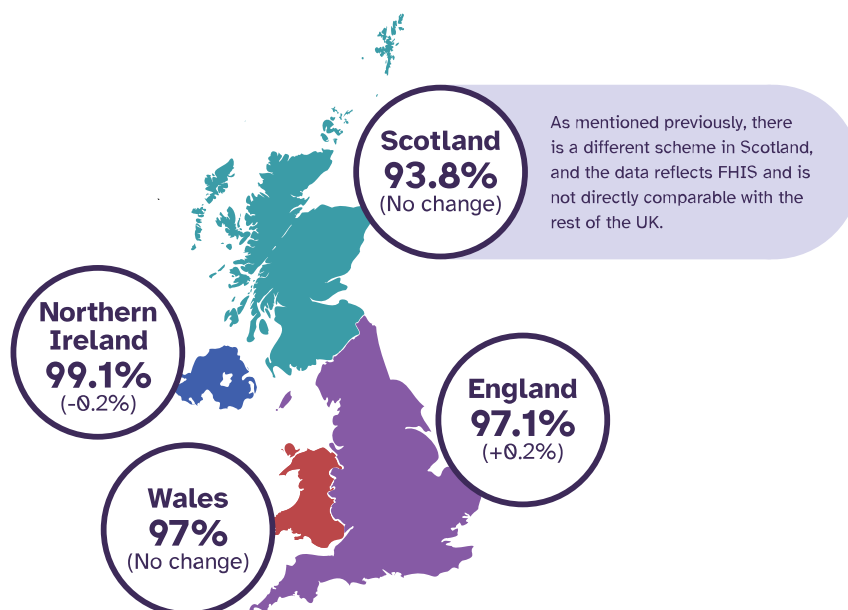
Figure 21: Percentage distribution of FHRs ratings based on data gathered on 31 December 2022 reporting the most recent inspection

FHRs Rating	0	1	2	3	4	5
England	0.2%	1.3%	1.4%	6.4%	15.0%	75.7%
Wales	0.2%	1.5%	1.3%	7.4%	18.1%	71.6%
Northern Ireland	0.0%	0.3%	0.6%	3.2%	12.5%	83.4%

By contrast, the FHIS scheme in Scotland is based on a pass or fail rating: 93.8% of inspected businesses met the required standard in 2022 (figure 22).

Figure 22: Percentage of UK food businesses achieving satisfactory or better ratings for food hygiene, as of 31 December 2022

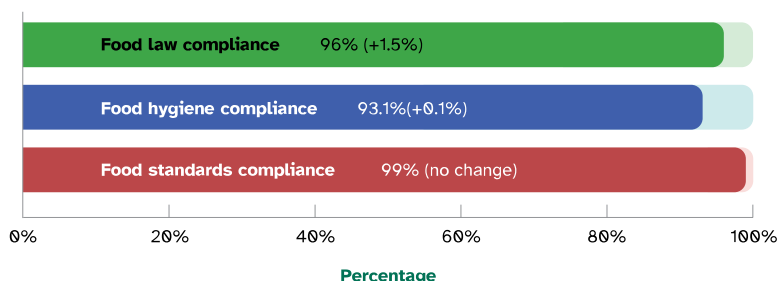
Figure 22: Percentage of UK food businesses achieving satisfactory or better ratings for food hygiene, as of 31 December 2022



Furthermore, under the Scottish inspection regime, Food Law Rating System (FLRS), businesses now receive an overall food law assessment of legal compliance, which brings together outcomes of hygiene and standards checks carried out by local authorities. For those businesses that have gone through this newer process, the percentage assessed to be legally compliant in 2022 increased slightly from the previous year (figure 23).

Figure 23: Percentage of food business operators in Scotland compliant with food laws for 2021/22 financial year

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Local Authority inspection volumes

The number of inspections and when they are carried out by local authorities directly affects the accuracy and relevance of FHRS and FHIS data. Since hygiene ratings can only ever reflect data taken from the last time each establishment was inspected, having an accurate picture depends upon enough inspections being carried out to reveal any significant movement. Without this, we remain heavily reliant on historic data from past inspections to assess whether hygiene standards have been maintained.

After the pandemic disrupted inspection activity, all local authorities developed recovery plans to help re-establish food hygiene controls. Figures 24 and 25 chart the progress made by tracking the number of inspections carried out over the last four years for England, Wales and Northern Ireland and Scotland respectively. In 2020, we can see there was a sharp and immediate fall in the number of ratings issued as parts of the hospitality sector were closed, social distancing laws

took effect and local authority resource was diverted. Volumes partially recovered during 2021, and the number of businesses issued with a food hygiene rating largely returned to pre-pandemic levels throughout 2022.

Although this is an important milestone in terms of re-establishing effective oversight after the COVID-19 pandemic, it should be stressed that there were still approximately [39,500 unrated businesses](#) at the end of 2022 across England, Wales and Northern Ireland that had not yet been assessed. However, the number of unrated businesses has decreased by 48.7% from a post-pandemic peak of 77,000 in April 2021 as local authorities continue to recover.

This means that we do need to be cautious about drawing firm conclusions on the current state of food hygiene standards until these challenges have been addressed. It also underlines the importance of ensuring local authority teams are adequately staffed so that they can maintain good oversight of standards into the future, as we will explore later.

Figure 24: The number of food businesses issued a food hygiene rating by quarter for England, Wales and Northern Ireland from 2019/20 to 2022/23

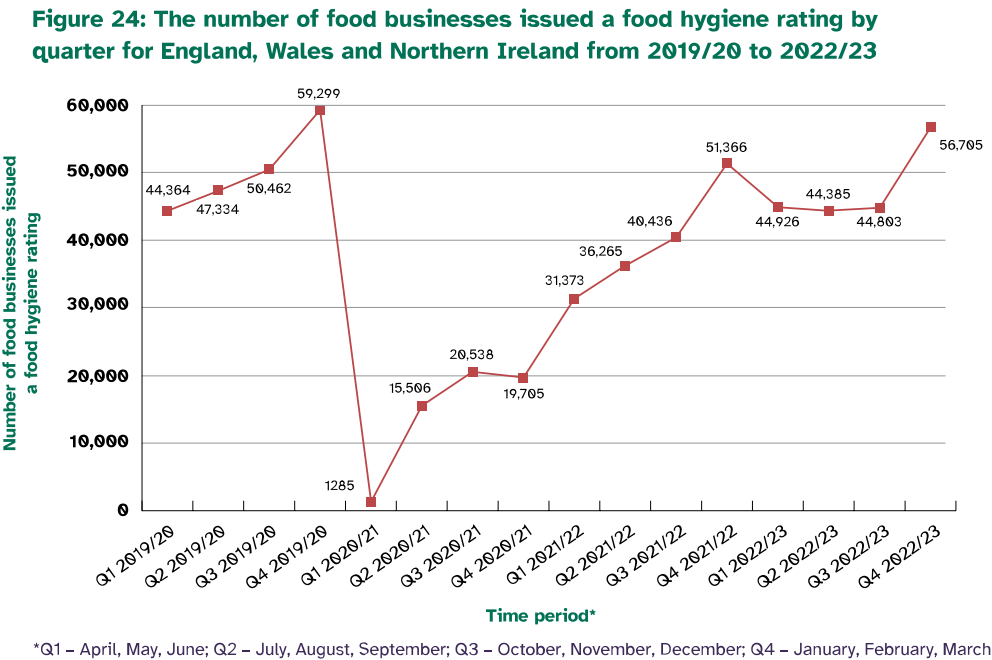
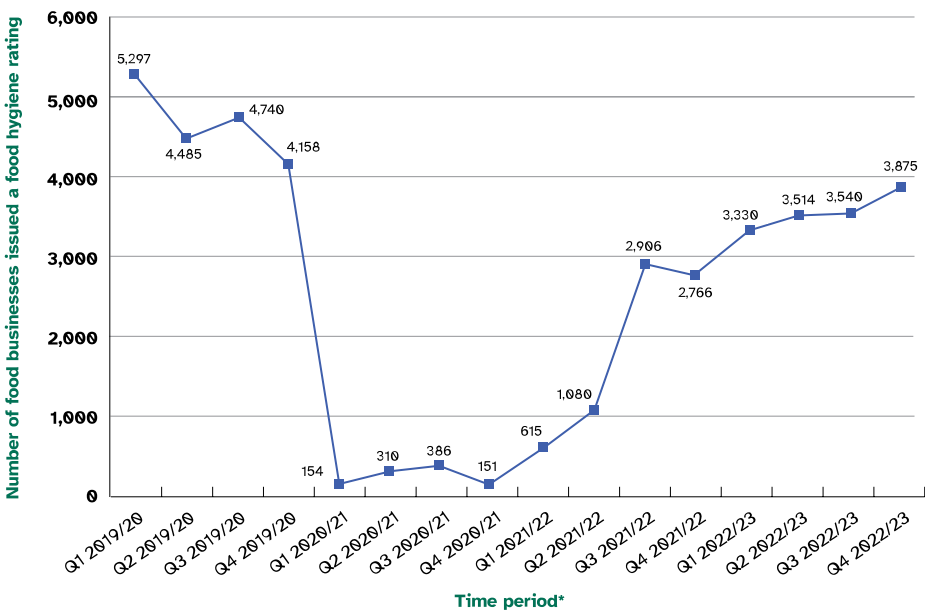


Figure 25: The number of food businesses issued a food hygiene rating by quarter in Scotland from 2019/20 to 2022/23

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Hygiene in approved in meat establishments

All FSA and FSS-approved meat establishments ([footnote 3](#)) – which include slaughterhouses, game handling establishments, cutting plants and wholesale meat markets - are subject to risk-based audits to check they meet hygiene standards.

The way these audits are carried out varies across the UK, this means it is difficult to make direct comparisons between the four home countries. However, figures 26 and 27 show that across the UK, the percentage of meat establishments with satisfactory or good hygiene standards was high – over 98% in Scotland and over 99% for the rest of the UK according to their most recent data gathered on 31 December 2022.

There has been a notable 12.9 percentage point rise since 2021 in Scottish business compliance since 2021, which may be due to changes in the audit approach to allow quicker interventions in cases of poor compliance. However, the actual scale by which compliance ratings are assigned remains unchanged, which means that the same definition of a ‘good’ rating is applied consistently throughout the UK. This gives confidence that overall compliance itself remained high.

Figure 26: Percentage of meat establishments rated as good or satisfactory for hygiene in 2022

Country	Percentage of meat establishments rated as good for satisfactory for hygiene in 2022	Percentage point change against 2021
England and Wales	99.3%	+0.7%
Northern Ireland	100%	No change
Wales	98.4%	+12.9%

Figure 27: Breakdown of hygiene compliance ratings ([footnote 4](#)) for meat establishments (based on most recent data collected 31 December 2022)

Country	Good	Generally Satisfactory	Improvement necessary	Urgent improvement necessary

England and Wales	64.2% (+7.4%)	35.1% (-6.7%)	0.5% (-0.6%)	0.2% (n/c)
Northern Ireland	87.0% (-7.0%)	13.0% (+7.2%)	0.0% (n/c)	0.0% (n/c)
Scotland	91.9% (+26.7%)	6.5% (-12.8%)	1.6% (-12.9%)	0.0% (n/c)

Notes: Percentage point change against 2021 data is shown in brackets.

Hygiene compliance in milk production

As with meat establishments, the responsibility for the inspection of dairy businesses varies across the UK nations but again the available data indicates that the majority are rated as compliant.

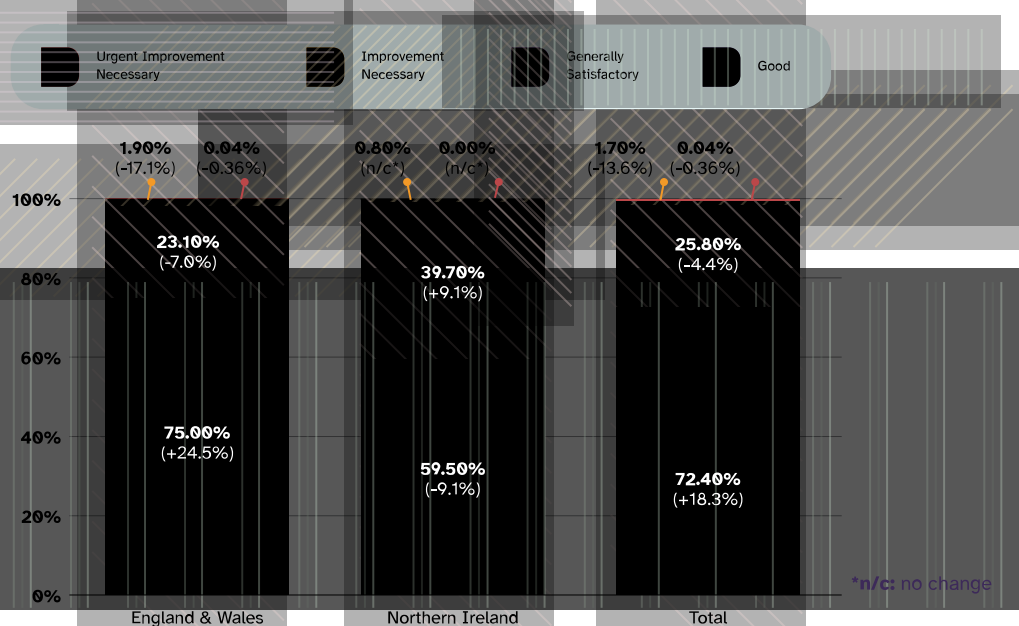
In England and Wales 98.1% of dairy establishments were assessed as either good or generally satisfactory in 2022 (figure 28). This is an increase compared to the previous year's results and is due to a change in the way dairy hygiene compliance is calculated. This year's data takes into account compliance both at the initial inspection as well as at the time of subsequent follow-up action where interventions were delivered. It reflects the most up-to-date information we have on compliance and better aligns with the reporting methodology used by Northern Ireland.

Figure 28: Percentage of dairy establishments in England, Wales and Northern Ireland which achieved the highest outcomes of either Good or Generally Satisfactory as of 31 December 2022

Country	Percentage of establishments which achieved good or generally satisfactory outcomes	Change from previous year
England and Wales	98.1%	(+17.6%)
Northern Ireland	99.2%	(+0.3%)

Figure 29: Breakdown of hygiene compliance ratings for dairy establishments from inspections data collected 31 December 2022

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Notes: Percentage point change against 2021 data is shown in brackets.

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Source: K2 dairy data system (England and Wales), DAERA Agri-food Inspection Branch dairy system (NI) 2002.

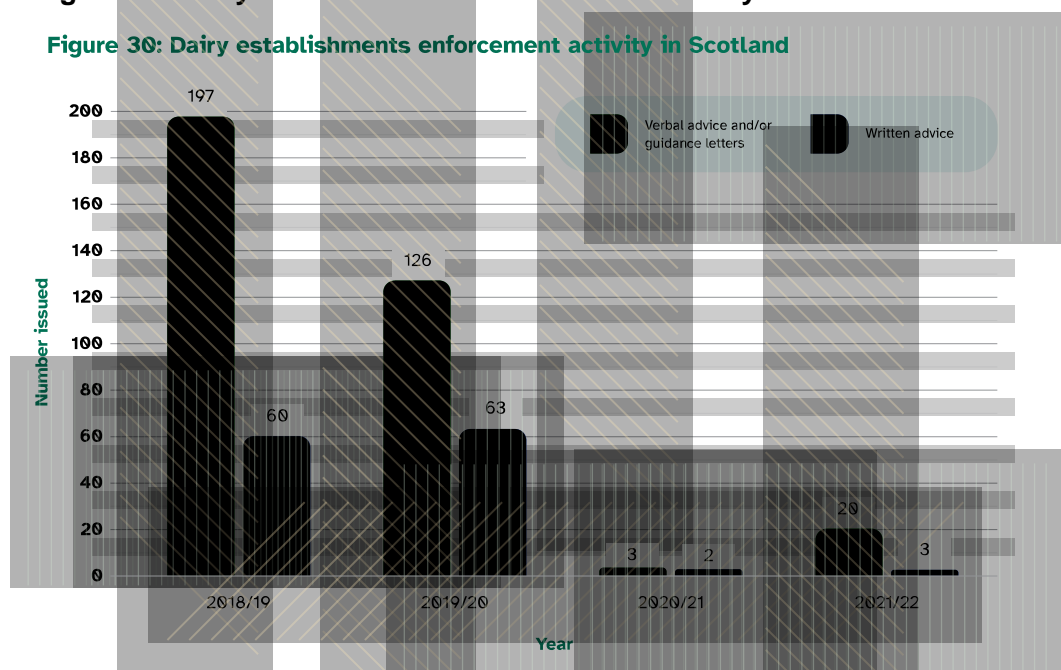
Northern Ireland's overall compliance also remained stable (figure 28), although there was a 9% drop in the proportion of 'good' establishments and an equivalent rise of those assessed to be 'generally satisfactory' (figure 29).

In Scotland, it is more difficult to form an accurate picture of whether dairy hygiene standards have changed in the absence of comparable compliance data. FSS has no direct enforcement role for dairy hygiene, which is instead the responsibility of 32 Scottish local authorities who hold this data.

Enforcement activity has been severely hampered by the COVID-19 pandemic, with available resources concentrated on monitoring high-risk food businesses, for example those providing unpasteurised milk for cheese production. As Scotland does not allow the sale or distribution of raw drinking milk, it has a higher proportion of dairy farms that are generally considered lower risk in the inspection regime compared to those in the rest of the UK.

What we can conclude is that there has been an increase in the number of guidance letters and instances of written advice issued in 2021/22 (figure 30) as enforcement activity begins to restart. No hygiene improvement notices (HINs) had been issued between April 2018 and March 2022. HINs are a more serious enforcement measure and are issued where a hygiene non-compliance breaches regulations and must be rectified within a set time period. While the data set is extremely limited, this suggests that the majority of recently inspected Scottish dairy establishments are operating safely.

Figure 30: Dairy establishments enforcement activity in Scotland



Hygiene compliance across animal feed establishments

Animal feed is an important part of the food chain, and any hygiene and safety failures can pose significant risks to human health. Animal feed businesses must therefore meet a range of legal requirements relating to hygiene, traceability, labelling, composition, and undesirable substances.

The responsibility for inspecting these businesses has undergone several changes in recent years and was also disrupted by the pandemic, leaving an inconsistent and often incomplete set of data ([footnote 5](#)). However, from the available data (figure 31), compliance levels in England and

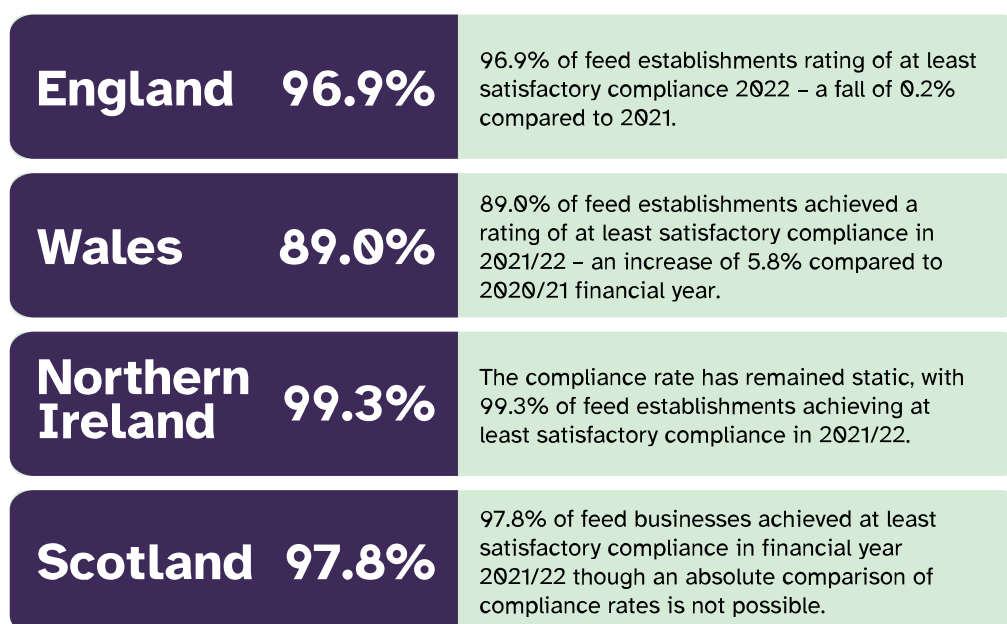
Northern Ireland in 2021/22 appear to have remained broadly the same as the previous year, with England's overall compliance [\(footnote 6\)](#) at 96.9%, falling by 0.2% compared to 2021 and Northern Ireland remaining static at 99.3% compliance.

In Wales, the data shows a rise in compliance levels during 2021-22, though it should be noted the number of premises inspected was dramatically reduced due to the ongoing impact of the COVID-19 pandemic, which makes it harder to draw any meaningful year-on-year comparisons. Due to limited resources, the feed delivery programme in Wales prioritised official controls at premises that are new, poorly compliant, or higher risk due to the nature of their activities, meaning that the percentage is not indicative of compliance levels across the sector as a whole.

On 1 April 2021, responsibility for animal feed checks transferred from local authorities to FSS. Consequent changes in data gathering make it impossible to provide annual trend data, but during the first year following transfer, 97.8% of Scottish feed businesses were compliant.

Figure 31: Percentage of feed organisations assessed as compliant with hygiene standards, according to latest available data

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The capacity and capability challenge

As we said at the start of this chapter, maintaining hygiene standards depends upon having enough trained and experienced staff to carry out inspections and work with food and feed businesses to ensure they operate within the law.

Across England, Wales and Northern Ireland, our analysis (figure 32) shows that there has been a substantial decline in the number of allocated [\(footnote 7\)](#) food safety officers over the last decade or so, with just under 14% fewer posts in 2022/23 compared with 2010/11. In Scotland, meanwhile, the number of occupied food law posts fell by 25.5% in 2021/22 compared to 2016/2017. This has led to difficulties in recruitment due to staff shortages.

During the pandemic in 2020/21, the percentage of unfilled posts across England, Wales and Northern Ireland increased to 57.7% due to the reallocation of food safety officers to deal with the COVID-19 pandemic. There has been a long-term decline in the number of funded posts that has been aggravated by staff shortages. In 2022, the rate of unfilled or vacant food safety posts (figure 33) remained higher than before the COVID-19 pandemic, with approximately one in

seven (13.7%) allocated posts across England, Wales and Northern Ireland vacant in 2022.

Furthermore, these reductions in capacity are not limited to food hygiene. There has also been a 45.1% drop in the number of food standards officer allocated posts from 2011/12 to 2021/22 in England, Wales and Northern Ireland. Trading standards officers, who most commonly check the composition and nutritional content of food and the accuracy of labelling and advertising, have been in particularly sharp decline. These checks are important in tackling fraudulent, inauthentic, or mislabelled food, described in more detail in the next chapter.

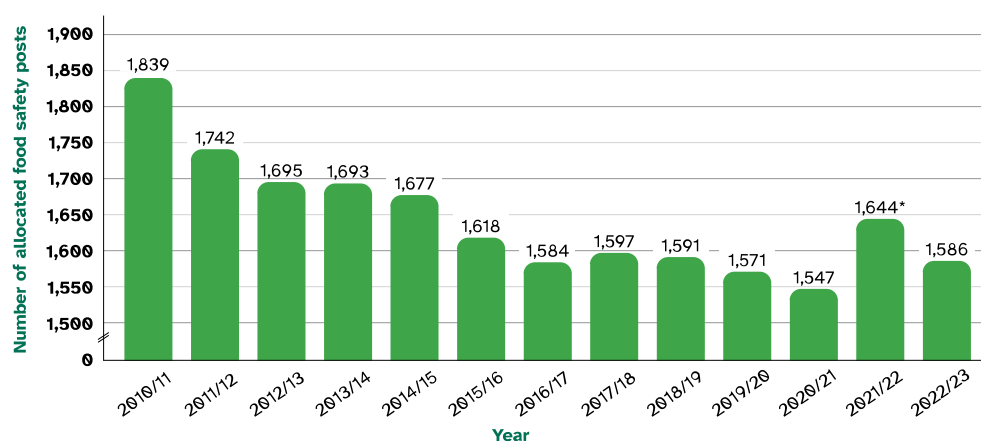
Indeed, [a workforce survey report published by the Chartered Trading Standards Institute \(CTSI\)](#) in 2020 found that trading standards officer staffing levels have fallen between 30% and 50% across the UK between 2008/9 and 2018/19. The survey also found that just over half of the local authorities in the UK did not believe they had sufficient expertise to cover the full range of trading standards responsibilities, and that the ageing trading standards workforce was a threat to future professional capacity.

Within Scotland, environmental health officers and food law officers carry out both food hygiene and the food standards functions that trading standards officers would traditionally carry out within the rest of the UK, therefore the 25.5% reduction within Scotland in occupied food law posts has been particularly difficult.

Maintaining sufficient supply of experienced professionals to carry out inspections is essential for upholding food hygiene standards. The long term reductions in local authority staffing numbers, coupled with growing recruitment challenges and an ageing workforce, are putting unsustainable pressure on existing teams and increase the potential for food safety issues going unchecked and undiscovered in the future.

Figure 32: Number of allocated food hygiene posts held by local authorities across England, Wales and Northern Ireland from 2010/11 [\(footnote 8\)](#)

Figure 32: Number of allocated food hygiene posts held by local authorities across England, Wales and Northern Ireland from 2010/11^[25]



* While the available resource allocated to managing food hygiene controls improved in 2021/22, this may have been partly due to the additional, one-off funding given to local authorities to help them address the backlog of inspections following the pandemic.

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Figure 33: Percentage of unfilled food hygiene posts (FTE) in local authorities in England, Wales and Northern Ireland

Year	England	Wales	Northern Ireland	England, Wales and Northern Ireland combined
2018/19	8.7%	9.7%	9.7%	8.8%
2019/20	10.1%	6.9%	4.9%	9.6%
2020/21	58.4%	65.5%	25.4%	57.7%
2021/22	12.0%	27.7%	15.3%	13.7%

The situation in Scotland is similar (figure 34). In November 2021, there were 202.8 Full Time Equivalent (FTE) officers in place out of an establishment of 261.7 FTE with an estimated need for 380.3 to fulfil all Code of Practice requirements, a deficit of 46.7%.

Figure 34: Number of allocated food hygiene posts held by local authorities across Scotland as of November 2021

N/A	Number	Percentage
Established posts	261.7	N/A
Posts filled	202.8	77.5%
Vacancies	58.8	22.5%
Estimated Need	380.3	N/A
Estimated shortfall to meet need	177.4	46.7%

Source: The Society of Chief Officers of Environmental Health in Scotland (SoCOEHS)

In addition, The Society of Chief Officers of Environmental Health in Scotland (SoCOEHS) advise that nearly two-thirds of food law officers (64.1%) and more than half (50.7%) of all environmental health officers working within food law in Scotland are over 50 years old.

Figure 35: Number of filled local authority food law posts (FTE) in Scotland

Year	Number of Filled posts
2016/17	271
2017/18	No data available
2018/19	223
2019/20	214
2020/21	No data available
2021/22	202

Source: The Society of Chief Officers of Environmental Health in Scotland.

Supporting Local Authorities

FSA and FSS are already supporting local authorities to make the best use of available resources:

The FSA's Achieving Business Compliance (ABC) programme is developing new ways of modernising how local authorities maintain regulatory standards. A new approach for food standards inspections is now being rolled out, which includes a more risk-based approach to inspecting food businesses, greater flexibility for local authorities to check compliance in different ways and increased use of intelligence. These changes should allow local authorities to make the best use of their available resource, spending more of their time with the highest risk and least compliant businesses. The new approach should also support greater use of intelligence to disrupt the supply of fraudulent or inauthentic food further up the food chain before it hits the shelves. The FSA is now consulting on changes to the approach to food hygiene inspections.

FSS have created a proposed programme Scottish Authorities Food Enforcement Rebuild Programme (SAFER), which replaces FSS' Regulatory Strategy Programme, which will explore ways of increasing resource, reducing demand, improving efficiencies, and developing digital solutions to support local authorities.

The FSA has also commissioned research on the nature and extent of issues surrounding local authorities' ability to recruit and retain suitably and appropriately qualified and experienced officers to deliver official food and feed controls.

This is a complex issue and not something that rests solely on the FSA and FSS to resolve. But it cannot be ignored if we want to adequately protect consumers now and in the future. Both agencies will work with other government departments, professional bodies, local authorities, and other external partners to develop solutions.

Official Veterinarian resources

OVs play a key role in ensuring meat produced in slaughterhouses or processing plants is handled safely and in line with relevant laws. However, the entire veterinary profession is facing resourcing challenges, which are contributing to particular difficulties in recruiting sufficient OVs.

The RCVS reported a 27.4% fall in the number of people joining the veterinary profession between 2019 and 2022 and there has been a particular reluctance among domestically qualified vets to take on public health roles.

Although the staffing models used by the FSA and FSS differ (the FSA works with an external agency responsible for providing OVs, while FSS employ them directly, using temporary and agency staff as necessary), both have been affected by this squeeze in supply.

As a result, overseas recruitment currently remains an important way of securing sufficient staffing, supported through RCVS Temporary Registration.

What is Temporary Registration?

RCVS Temporary Registration: Temporary Registration (TR) has allowed appropriately qualified veterinarians from EAEVE (European Association of Establishments from Veterinary Education) accredited universities, who held a Level 5 IELTS English qualification, to temporarily register with the RCVS.

This allowed them to work as Temporarily Registered Novice Official Veterinarians (TRNOVs), while they completed their training in English language, to carry out meat official controls in abattoirs under supervision. In Scotland, FSS did not access the TR route in 2022.

Temporary Registration has allowed OV numbers to increase steadily in England and Wales. There were 103 TRNOVs out of a total of 272 OVs, which equated to 38% of all OVs, deployed as at 31 December 2022.

This allowed for maintenance of service delivery in abattoirs and has avoided service delivery failures, meaning that no abattoir was prevented from operating due to the lack of an OV being in attendance.

As we look ahead, the FSA is working with its delivery partners and has agreed to financial support in the form of a contract variation for the remainder of the current OV contract. This is specifically to be used to deliver enhanced OV salaries in line with other veterinary roles. This will help to improve retention and reduce reliance on Temporary Registration.

The FSA has worked closely with universities to raise the profile of OV's (and increased investment in this work) and has supported work to identify competitive OV salary packages. FSS has established additional pay and recognition schemes, improved training and developed an Official Controls Veterinarian Qualification in close partnership with the Scottish Qualifications Authority. However, despite these initiatives, the future supply of experienced professionals to fill OV roles remains a significant risk across the UK and both the FSA and FSS will continue to monitor this closely and proactively address these challenges.

In summary

Nine in ten businesses inspected by local authorities across the UK achieved a satisfactory or better rating for food hygiene based on data collected on 31 December 2022. However, hygiene ratings can only ever reflect data taken from the last inspection carried out on each establishment. We remain heavily reliant on historic data from past inspections to assess whether hygiene standards have been maintained. Local authorities are continuing to restore hygiene controls and make up the backlog in inspections in line with their recovery plans. Overall inspection volumes for 2022 returned to pre-pandemic levels.

While the available data on hygiene standards in meat, dairy and animal feed establishments is incomplete in places, the general picture based on the last available inspection suggests that the vast majority of businesses inspected are operating safely, with more than 89% compliance across these sectors.

The immediate workforce capacity challenges created by the redeployment of staff since the pandemic have largely recovered. However, the proportion of unfilled food hygiene posts held by local authorities is increasing and the overall resource allocated to managing food hygiene is 13.8% less than in 2010/11 in England, Wales, and Northern Ireland. FSA and FSS believe this is putting unsustainable pressure on existing local authority teams and may increase the risk of important food safety issues being missed.

The number of food standards allocated posts in England, Wales and Northern Ireland, which are largely staffed by trading standards officers, have declined by 45.1% from 2011/12 to 2021/22, while a high proportion of the workforce is also approaching retirement age. Our concern is that this reduced capacity to assess authenticity, labelling and allergens compliance may compromise food standards in the future.

In Scotland, the number of occupied food law officers has fallen by just over a quarter compared to 2016/17. The SoCOEHS has reported that, since 2016, there has been a reduction of 14% in posts within Environmental Health, a reduction of filled posts of 21% and a 315% increase in vacancies.

Securing enough veterinary resource to manage inspections in meat establishments is being hampered by a shortage of veterinarians entering the profession, an increase leaving the profession and challenges in recruiting additional veterinary professionals from European countries. While short term contingency measures – most notably the use of Temporary Registration for veterinarians from overseas to work under supervision – have allowed meat hygiene inspections to be maintained during 2022, it is important that we retain our experienced OV's and develop new ways of managing demand.

1. In Wales, the scheme also covers business-to-business operations such as manufacturers that fall under the remit of local authorities.

2. Both the FHRS and FHIS provide information about the standard of food hygiene of establishments based on their most recent inspection. FHRS provides a rating between 0 and 5, with 5 being the highest score, indicating 'very good' hygiene standards. FHIS provides a rating of 'pass' or 'improvement required'. For this analysis, we have taken an FHRS rating of 3 or above to indicate satisfactory or better rating for English, Welsh and Northern Irish businesses assessed under the FHRS, and a 'pass rating' for Scottish businesses assessed under the FHIS. Given differences between FHIS & FHRS, the data between Scotland and the rest of the UK is not comparable.
3. Approved meat establishments handle, prepare or produce products of animal origin for which requirements are laid down in retained EU Regulation (EC) No. 853/2004.
4. For an explanation of what the ratings categories mean, visit the [FSA business guidance on auditing meat establishments](#)
5. This was primarily due to the transition in Scotland, with FSS becoming the competent authority for feed and moving to a new electronic system. Any feed inspection outcomes pre 2021 are taken from local authority information.
6. Animal feed establishments are rated as either 'Poor Compliance', 'Varying Compliance', 'Satisfactory Compliance', 'Broad Compliance or better' and 'Minimum of Satisfactory Compliance and a member of a FSA approved assurance scheme'. Any establishment rated above 'Satisfactory' is considered to be compliant. More information can be found in the Feed Law Code of Practice.
7. Allocated posts are professional posts allocated to deliver a local authority's food hygiene controls service based on available budget.
8. Local authorities calculate the proportion of occupied posts using a variety of methods. These are often estimates of resource, which have not been fully validated by the FSA.