

Executive Summary

Executive Summary for Local Authority Shellfish Traceability Audit Summary Report (England) - July 2025

This report highlights the findings and conclusions of the planned audit programme of local authority (LA) Food Safety Services in England, focusing on arrangements for the delivery of official controls in relation to shellfish traceability and in particular the issuing of shellfish registration documents (SRDs) to harvesters by LAs.

Based on the evidence found across all 8 audits, we have provided a **Moderate** audit opinion. Further details can be found in part 6 of this report.

LAs audited were issued with an audit report including an agreed action plan to address any issues identified, which will be monitored until the actions are implemented. All the LAs involved received at least one recommendation, with 28 recommendations being made in total. The distribution of recommendations made can be seen at Annex A. In addition, observations for the FSA can be seen at Annex B.

Areas of good practice were identified during the audits. These can be seen throughout the main body of the report.

Key Findings

Service Planning

All but one of the Services audited had documented and appropriately approved service plans in place, used to describe and explain how they would use their resources in the year ahead to deliver official controls.

Authorities could strengthen service plans by ensuring that the resources required to deliver official controls in relation to shellfish and the issuing and monitoring of SRDs are accurately estimated. This should also include an estimation of the resources required for undertaking internal monitoring, maintenance of key business files and records and appropriate follow up actions to achieve timely business compliance.

In common with other specialist areas of work, LAs, appeared to be highly dependent upon a small number of experienced and trained officers for the delivery of specialist shellfish traceability controls, leaving them potentially vulnerable should these officers leave the organisation. LAs were advised to improve the resilience of their service by training and developing other officers to carry out delivery of these controls.

Liaison with other organisations

There was evidence that this was currently a key strength of the LAs involved in the audit. Effective liaison with other key stakeholders such as the regional IFCA's, MMO, harbour masters and shellfish liaison groups is essential to create an intelligence network to identify shellfish

harvesting across the country, maintaining confidence in the shellfish traceability system.

Officer Authorisation and Training

All the officers assessed were able to provide some evidence of appropriate specific training on matters relating to shellfish. It was apparent that many Authorities were finding it difficult to source appropriate update training in this area to help maintain officer knowledge and competency.

Issuing and monitoring SRDs

All the LAs involved were able to provide evidence that SRDs were being issued by them upon request. For the sake of efficiency, most LAs were issuing SRDs to established harvesting businesses in batches. All of the SRDs assessed as part of the audit were traceable back to the harvester, and then up the chain to the point where relevant ID marks were applied to individual batches of shellfish. In most cases some form of monitoring of the SRDs was taking place to ensure that they were returned fully completed and contained all the relevant information required.

One audit did demonstrate some of the difficulties that can be experienced in delivering traceability controls and SRDs when there are complex commercial arrangements involved, sometimes with businesses performing multiple roles at the same time. LAs would welcome further guidance from the FSA with worked examples in these situations.

Food Establishments Interventions and Inspections

Interventions were being delivered by LAs at shellfish harvesters, although the majority were rated as low risk primary producers and potentially subject to Alternative Enforcement Strategies (AES). Some improvements were identified, to ensure that traceability checks, including checks on any SRDs issued, are routinely carried out and documented in inspection records.

Reality visits to a range of shellfish harvesters were carried out as part of the audits. Auditors were able to verify that the business activities matched Authority file records and officers were able to describe and explain the traceability systems being operated by the businesses.

Internal Monitoring and Corrective Actions

One of the areas that required strengthening based on the audit findings was qualitative monitoring of service activities. All the Services audited had some form of appropriate quantitative monitoring in place, but most Authorities had only limited qualitative monitoring of service activities. To help ensure that LAs provide a consistent and effective service, it is recommended that LAs review, update and implement suitable internal monitoring procedures considering the whole range of food enforcement activities carried out including any activities associated with shellfish traceability and to use a risk-based internal monitoring approach.