

# Food Standards Agency

## The New Feed Delivery Model (England)

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## 1 Introduction

- 1.1 As the UK central competent authority for feed and food, the Food Standards Agency (FSA) has a statutory responsibility under EU legislation<sup>1</sup> for the delivery of a programme of animal feed official controls and food hygiene controls. The EU official feed and food official controls regulation requires that these controls must be carried out regularly, on a risk basis and with appropriate frequency. Moreover, effective, risk-based controls are a key factor in safeguarding animal and public health and contributing to the Strategic Outcome that 'Food is Safe'<sup>2</sup>.
- 1.2 The FSA has designated local authorities (LAs) and the London Port Authority as Competent Authorities to deliver official controls for feed. To achieve the objectives in regard to the delivery of official controls the FSA has developed a Feed and Food Law Enforcement Standard, which was published by the Agency as part of the [Framework Agreement](#) on Official Feed and Food Controls by LAs (amended April 2010), a Feed Law [Code](#) of Practice (England) (published May 2014) (the Code) and a Feed Law [Practice Guidance](#) (England) (updated June 2014) (the Practice Guidance) to assist LAs with the discharge of their statutory duty to enforce relevant feed law.
- 1.3 There are approximately 200,000 feed businesses in the UK, contributing around £4.4b to the economy each year. Included within the number of feed businesses in England are approximately 110,000 farms that are covered by the food hygiene control programme. Failure to deliver effective feed controls represents a significant risk to animal and public health and to the UK's ability to trade globally. Historically, a breakdown in feed controls has resulted in major incidents, including the Foot and Mouth outbreak in 2001, costing the UK economy over £8b and the slaughter of 6m affected animals, and the BSE crisis, which led to human fatalities from Creutzfeldt-Jakob disease (CJD), generated significant losses for the UK economy, and ultimately led to the creation of the FSA to ensure effective delivery of official controls to safeguard public health.
- 1.4 However, DG Health and Food Safety – Audits and Analysis (formerly the Food and Veterinary Office (FVO) audits in [2009](#) and [2011](#) and FSA audits<sup>3</sup> of LAs highlighted significant concerns with the delivery of feed law official controls. DG Health and Food Safety questioned the sustainability of the delivery system in place at that time. Feed data returns showed a continuing decline in LA performance delivering feed controls. As a consequence there was concern that the delivery of official feed controls was not fully meeting our statutory obligation in line with Regulation (EC) No

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<sup>1</sup> [Regulation \(EC\) No 882/2004 – Article 4 Designation of competent authorities and operational criteria](#)

<sup>2</sup> [FSA Strategic Plan 2015-2020](#)

<sup>3</sup> [Summary Report - An assessment of local authority feed control enforcement at inland feed establishments, including primary producers in England and Wales](#)

882/2004<sup>4</sup> and there was a risk that the UK may have faced infraction proceedings by the EU for failing to implement EU legislation.

- 1.5 The key failings identified by DG Health and Food Safety and FSA audits included:
- Lack of quality controls;
  - Weak imported and inland feed controls;
  - Poor or variable HACCP based inspections;
  - Poorly targeted sampling programmes;
  - Poor follow-up on non-compliant businesses;
  - Low or no LA priority given to feed; and
  - Low quality data received by FSA from LAs.
- 1.6 Furthermore in 2011/12 only 44 of 147 (30%) LAs were engaged with the FSA in respect of feed delivery funding. With the continued tightening of resources for central and local government, there was also a growing need to consider alternative approaches to delivery of official feed controls.
- 1.7 As a result of the DG Health and Food Safety audits, the decision was taken to transfer funding from the RSG into the FSA's budget to allow money to be allocated directly to LAs on the basis of planned activity. This activity reflects the inspection frequencies determined by LAs under the Code, includes a programme of sampling based on [National Enforcement Priorities](#) set each year by the Agency and point of entry import controls<sup>5</sup>.
- 1.8 This change resulted in some improvement, but a comprehensive [review of official animal feed controls](#) in 2012 concluded that further work was necessary to establish an effective system of controls. Specifically, the review recommended:
- A revised Code and Practice Guidance;
  - Inspection frequencies determined by compliance history and FSA approved assurance scheme membership;
  - Approval of [Red Tractor](#) and [AIC Assurance](#) Schemes to support earned recognition and a reduced frequency of official controls for members of these schemes;
  - Ensuring LAs and other stakeholders are equipped with appropriate technical knowledge and information by improving the existing [FSA feed training programmes](#);
  - Continuation of the dedicated funding (approximately £3m per year) to support official feed controls, using the money that the Agency had taken from the allocation otherwise given to LAs via the Revenue Support Grant; and

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<sup>4</sup> [Article 4 of Regulation \(EC\) No 882/2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules](#)

<sup>5</sup> <https://www.food.gov.uk/enforcement/enforcework/food-law/guidance-enforcement-0/national-enforcement-priorities>

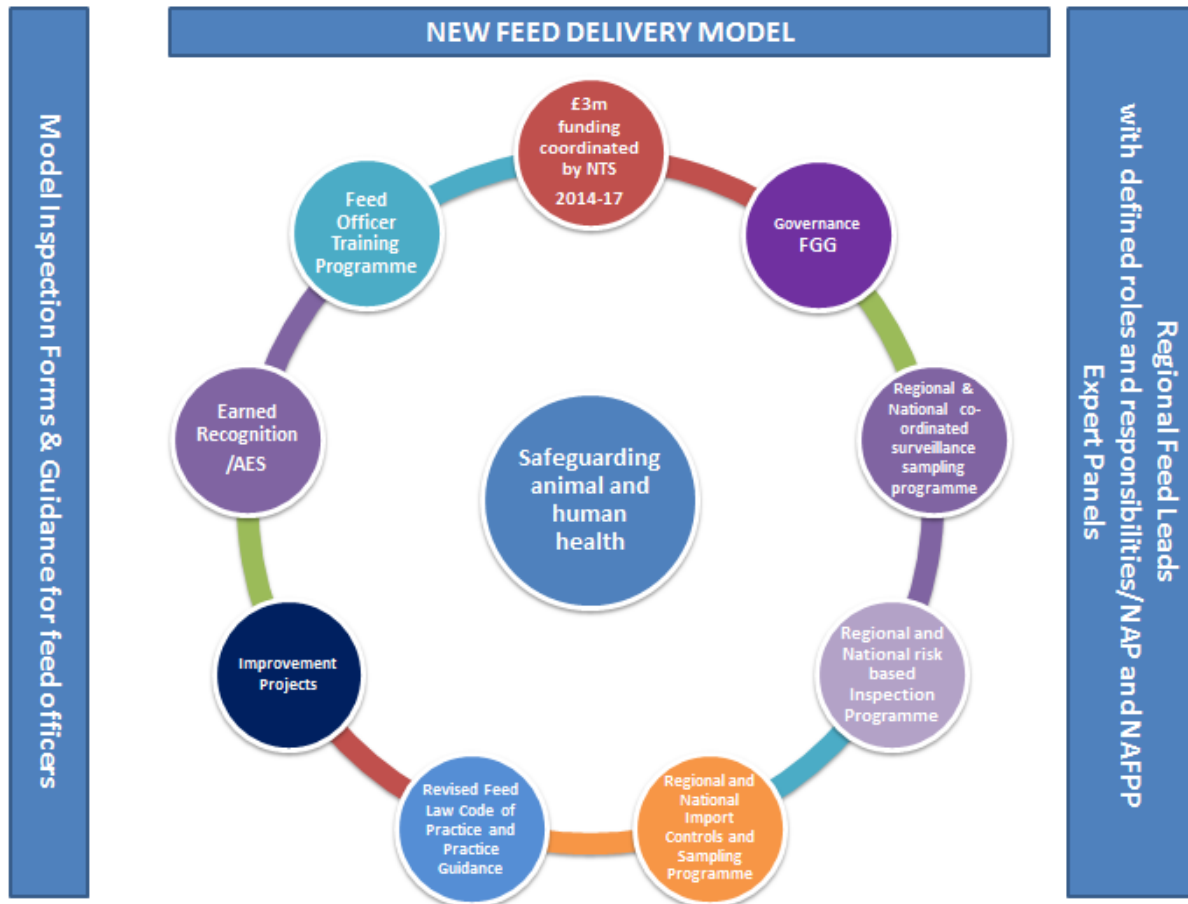
- Official Controls coordinated by National Trading Standards (NTS) for an initial period of 3 years (2014-2017) through a memorandum<sup>6</sup> of understanding across nine English regions “the Feed Delivery Programme (FDP)”.

- 1.9 The new approach to delivery of feed controls was first agreed by the FSA’s Board in November 2012 and further endorsed at their meeting in April 2013 (records of the meetings are publically available). A DG Health and Food Safety audit in [2014](#) reported significant improvements in the system of controls and specifically acknowledged the positive impact of the targeted funding on ensuring effective delivery.
- 1.10 The implementation by the FSA of the above recommendations resulted in the ‘New Feed Delivery Model’ (NFDM): a multi-faceted solution to improve the effectiveness of official feed controls, delivered in partnership with key stakeholders, ensuring timely, appropriate, proportionate and consistent delivery of controls to secure compliance with feed law.
- 1.11 The inevitable consequence of not having these robust controls in place could clearly result in a detrimental effect on animal health and welfare and the human food chain, reputational damage to LAs and the FSA as well as loss of confidence in the feed industry. Figure 1 below shows the main component parts making up the NFDM.

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<sup>6</sup> <http://www.nationaltradingstandards.uk/work-areas/feed-hygiene-delivery/>

Figure 1: The New Feed Delivery Model



1.12 With the NTS MoU expiring in March 2017, it is important that the Agency evaluate whether the current arrangement is effective and provides value for money and whether it should continue as it is, needs amending; or if an alternative approach should be explored. This evaluation will consist of an internal assessment to review the NFDM for feed law official controls which will include an evaluation of effectiveness of the NFDM in terms of:

- Coordination, planning and monitoring of the delivery of official feed controls;
- The governance of official feed controls;
- How earned recognition has been incorporated into the planning of official feed controls; and
- The value for money achieved by the NFDM.

Eleven (11) audits of LAs will also be undertaken between July and September 2016 with the objective of *“providing assurances to the FSA Animal Feed Delivery (AFD) team that the NFDM, administered by NTS, and developed following the animal feed review commissioned as a result of adverse DG Health and Food Safety audits in 2009 and 2011, has been effectively implemented by LAs and that official controls, as laid down in the Agency’s Feed Law Code of Practice, Practice Guidance and*

*Framework Agreement, in regard to feed not of animal origin, are being carried out by LAs, in order to safeguard animal and public health<sup>7</sup>.*

## 2 The NFDM

### 2.1 Introduction

2.1.1 The NFDM is a multi-faceted solution to improve the effectiveness of official feed controls, delivered in partnership with key stakeholders, ensuring timely, appropriate, proportionate and consistent delivery of controls to secure compliance with feed law. This section describes the component parts making up the NFDM.

### 2.2 The NTS Feed Delivery Programme (FDP)

#### 2.2.1 Introduction

2.2.1.1 LAs are required to develop and implement an annual effective, risk-based programme of feed controls<sup>89</sup> which covers all parts of the feed chain including, where appropriate, controls on importers at points of entry, and on those food businesses placing surplus food or co-products<sup>10</sup> into the feed chain.

2.2.1.2 From the 2014/15 financial year, a new approach to the delivery of feed law official controls has been adopted in England. The FSA have agreed an initial three-year (2014-2017) Memorandum of Understanding with the NTS for the coordination of local delivery of feed law official controls. The NTS are a body set up by central UK government to more effectively coordinate delivery and administer funding for activities to LAs working through nine regional groups across England. Under the MoU, the FSA works closely with NTS to:

- a) agree annual programmes of activity, including inspection, point of entry controls, improvement projects and sampling;
- b) allocate funding to regional groups of LAs to finance these activities;
- c) co-ordinate the allocation of grants to LAs ensuring the regional and national animal feed inspection, sampling and import control programmes deliver effective official controls which:
  - Provide value for money;
  - Achieve the FSA's priorities as defined in the national control plan;
  - Are based on addressing risk across the regions, as defined in the Code;
  - Meet the quality requirements of the FVO; and
  - Promoting consistency and quality on the delivery of animal feed official controls throughout England.

<sup>7</sup> [FSA Strategic Plan 2015-2020 – Food we can Trust](#)

<sup>8</sup> Section 2.2.1 Delivery of Official Controls at all stages of production, distribution, and on the use of feed – Feed Law Code of Practice (England)

<sup>9</sup> Article 3.1 Regulation (EC) No 882/2004

<sup>10</sup> Article 4.2 (a) Regulation (EC) No 882/2004



## 2.2.2 NTS feed delivery programme methodology

2.2.2.1 As part of its 3 year MOU for England Feed Delivery NTS has developed a delivery methodology which has 3 components:

- A ‘desktop model exercise’ designed to model inspections, sampling and point of entry activity required in England for the coming year to allow risk-based and proportionate funding to be allocated to each Region for delivery commencing in April;
- A submissions process in which the region sets the plan of work for the year and sets costs for that work to be delivered within its allocation; and
- A quarterly claim which enables payment for work completed and tracks progress against the plan.

2.2.2.2 The first two stages above take place in the final months of the previous year to allow delivery to commence in April. Guidance is issued by NTS to support LAs to complete their desktop model exercise and submission worksheets. Figure 2 depicts the process and a timeline can be seen at [Annex 1](#).

2.2.2.3 Figure 3 shows the hierarchy of key delivery partners operating within the FDP.

**Figure 2: NTS feed delivery programme**

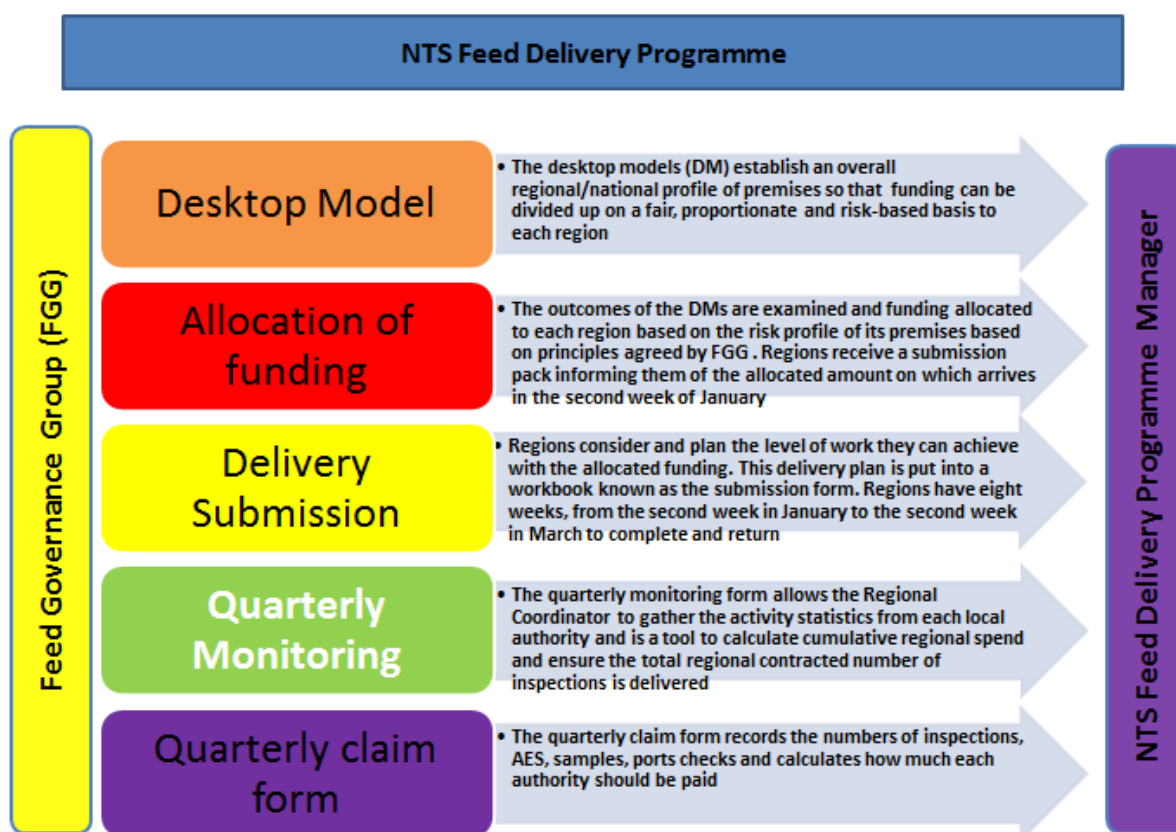
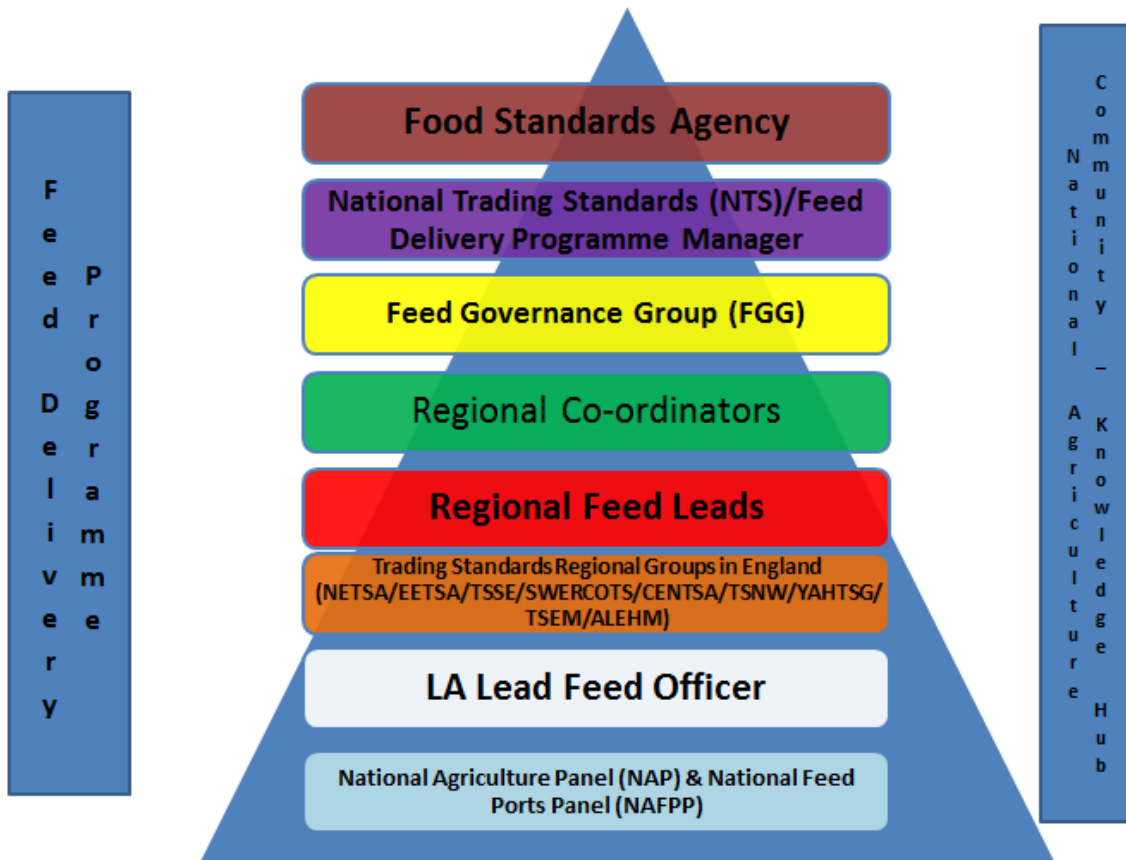


Figure 3: Key delivery partners within the FDP<sup>11</sup>

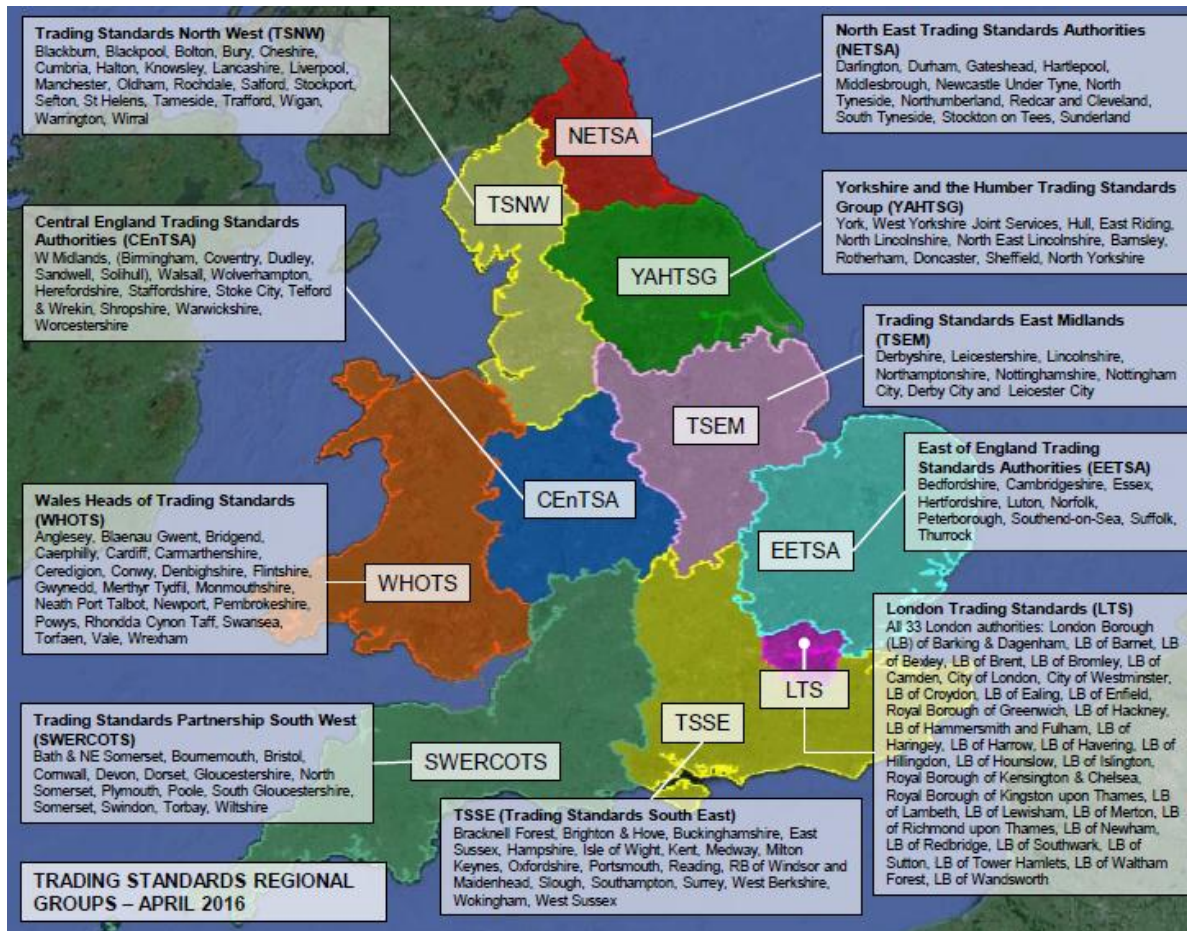


### 2.2.3 Inland Feed Inspection Programme

2.2.3.1 The nine English regions shown in Figure 4 have regional plans delivered by individual LAs. This drives innovative regional working, which in turn reduces the burdens on individual LAs which is co-ordinated through the [Regional Feed Lead](#).

<sup>11</sup> [See section 2.3 for a detailed description of the roles and responsibilities of the key delivery partners within the FDP.](#)

**Figure 4: Location of the nine English Regions and LA make-up of each**



2.2.3.2 The desktop modelling exercise uses the spreadsheet shown at [Annex 2](#). The aim is for each LA to populate the total number of feed businesses in their LA's register against each business code and subcategorised against their Level of Current Compliance. The spreadsheet models the number of inspections and alternative enforcement strategies (AES) due, based on the inspection frequencies in the Code.

2.2.3.3 The risk ratings within the model are those in the Practice Guidance<sup>12</sup>. The spreadsheet is also aligned to the national risk ratings scheme previously endorsed by the Association of Chief Trading Standards Officers (ACTSO).

2.2.3.4 The desktop planning exercise, carried out by NTS, as part of the regional distribution of funding for feed enforcement activity to the English regions has shown that some authorities appear to have interpreted elements of the desktop modelling process differently, in particular the Compliance score element.

2.2.3.5 In order for England to comply with the requirements of Regulation (EC) No 882/2004 it is necessary that the basis for levels of enforcement is as consistent as possible across the country. It is also important for the distribution of NTS feed funding that

<sup>12</sup> Figure 2 - paragraph 5.7 of the Feed Law Code of Practice Guidance

authorities are confident in calculating the risk of businesses and therefore the frequency of inspection on the same basis. The NTS has therefore produced guidance for LAs to understand what 'levels of compliance' look like in practical terms at a range of feed businesses.

#### 2.2.4 Local and national co-ordinated sampling programmes

2.2.4.1 The FSA National Enforcement Priorities (NEPs) for feed law enforcement developed annually in consultation with LA representatives on the National Agriculture Panel and the National Animal Feed at Ports Panel detail sampling priorities at point of entry, primary production and those feed establishments subject to HACCP requirements. This ensures that available funds for the analysis of feed are used effectively.

2.2.4.2 The NEPs are based on the results of enforcement activity from the previous years and include the Rapid Alert System for Food and Feed (RASFF) incident alerts, results of feed sample analyses and changes to animal feed legislation.

2.2.4.3 In respect of a co-ordinated approach to sampling as part of the FDP LAs are required to prioritise sampling against an agreed national and local priorities as outlined in the NEPS, choosing from a suite of analytes based on the LAs feed establishment premises profile and the types of feed available for sampling.

2.2.4.4 Since 2014 there have been two national sampling projects firstly in respect of assessing the levels of carryover of coccidiostats and veterinary medicines in non-target feed; and secondly a project to assess the extent of dioxins and polychlorinated biphenyls (PCBs) contamination in feed.

2.2.4.5 In 2014, the DG Health and Food Safety carried out an audit of the UK's system for delivery of animal feed controls. As a result of this audit, the FVO questioned the degree to which feed businesses' systems for managing risks included appropriate procedures for managing carryover of coccidiostats. This included assessment of carryover of veterinary medicines to ensure levels remain within any parameters set by the individual feed business, or the industry in liaison with FSA and the Veterinary medicines directorate (VMD).

2.2.4.6 In 2014, as part of the NTS FDP, LAs in England began a specific project aimed at working with feed businesses to understand whether the concern expressed by the FVO remained valid. Work as part of this national sampling project has been supported by a standard sampling protocol and training course, both of which have been developed by the FSA in partnership with industry representatives and LA regulators.

2.2.4.7 Local sampling priorities are driven by the type of feed business and types of feed available for sampling within a LAs area. A shopping basket approach as part of the FDP sampling programme allows officers to select from a 'pick list' of analytes namely inorganic contaminants i.e. heavy metals and fluorine; mycotoxins; pesticide

residues; salmonella; methanol; presence of unauthorised GM and other undesirable substances. LAs can also propose local sampling project initiatives where this is supported by intelligence.

## 2.2.5 Regional Point of Entry Import Controls Activity Programme

2.2.5.1 The purpose of the ports desktop model is to collect data about predicted animal feed monitoring and assessment checks, sampling and 3<sup>rd</sup> country official controls.

2.2.5.2 Guidance on prioritisation and consistency relating to feed imports has been developed as part of the NTS FDP to support a consistent risk based approach to imported feed work carried out by LAs in England<sup>13</sup>. The guidance has been developed with the National Animal Feed at Ports Panel (NAFPP). It aims to provide a prioritisation model for imported feeding stuffs, thus ensuring that funded activity will be targeted where it is most needed, ensure a consistent understanding of the legal and NTS requirements at ports, and define and clarify the terminology for official feed control activities at points of entry. This guidance was originally issued in November 2014. Since the original version was released specific guidance has been produced on imported feed work at 'de minimus' whose activity where there are no current 3<sup>rd</sup> country imports or where 3<sup>rd</sup> Country import levels below a certain threshold.

2.2.5.3 Regions with points of entry are expected to produce a brief narrative report annually, which outlines:

- Trends in 3<sup>rd</sup> country imports or non-compliance;
- A brief case study on anything unusual, suspicious or unexpected;
- Any concerns about the current system of checks locally or nationally; and
- Any major changes in activity or new developments at your port this year or upcoming.

## 2.2.6 Feed Delivery Programme Improvement Projects

2.2.6.1 The FDP deliver annual improvement projects, the outcomes of which can be shared nationally, with a view to sustained improvements in the levels of activity, innovative approaches to delivery and effectiveness of official controls.

2.2.6.2 Examples of improvement projects undertaken since April 2014 are detailed below:

- **Surplus food (TSSE/ALEHM/YAHTSG regions)** – A project to find out more information and in greater detail about the suppliers/distributors involved in sale or return supply models, and how they ultimately dispose of waste food. To identify how widespread the independent distributor model is outside of London. The objective being to gain a greater insight into the scale and nature of the operation of sale or

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<sup>13</sup> Paragraph 5.5 Points of Entry - The Feed Law Code of Practice (England)



- return models and establish whether there is a significant problem surrounding these which translate into a risk to the human food chain;
- **On-line feed sales (Warwickshire County Council)** – A project to determine the extent of on-line sale of feed/supplements; the level of compliance with feed law, risks posed and the extent of registration of the feed premises from where the products originate;
  - **SWERCOTS AES Toolkit** – A project which developed a toolkit in conjunction with the NTS FDP as a guide to assist LAs in carrying out Alternative Enforcement work at premises which have Earned Recognition in a consistent and effective manner. The document provides practical guidance including template questionnaires on how Alternative Enforcement Strategies can be applied and used at those FeBOs that have achieved Type 2 Earned Recognition;
  - **Model inspection forms (Externally commissioned)** – A project to address the need for model inspection forms with appropriate information to assist LAs ensure they worked in a consistent and effective way, in line with the Code and Practice Guidance requirements;
  - **Compliance Scores Guidance** – A project to address the need for guidance to support the accurate and consistent assessment and use by LAs of the “Level of Compliance” used in the FSA Code of Practice Risk Assessment Scheme and the “Likelihood of Compliance” scores used in the ACTSO Risk Assessment Scheme;
  - **Competency (NETSA Region)** – A project whose objectives were in conjunction with the FSA and the National Agriculture Panel, consider activity time and develop a feasible target of involvement in feed enforcement, for categories of inspections, in the current financial climate; to devise best practice guidance to assist LA in achieving appropriate levels of competencies to satisfy the FSA and FVO requirements; and identification of alternative delivery methods to mitigate the resource burdens placed on LAs in the provision of qualified and competent feed officers;
  - **Bird Nut Tracing (EETSA)** – A project whose objectives were to understand the ultimate destination for nuts imported into the UK that are claimed to be destined for wild and pet bird feed; to check that this is the route for the nuts and that they are not fed to food producing animals, or indeed are not diverted directly into the human food chain in order to ensure that any feed being fed to food producing animals is produced under the correct controls and that products not suitable for human consumption do not enter the food chain, thus ensuring the safety of the food chain for humans;
  - **The delivery of official feed controls at points of entry: consistency and prioritisation** – A project whose objectives were to develop guidance which defines and clarifies the terminology for official feed control activities at points of entry; ensure a consistent understanding of the legal and NTS requirements at ports, and develop a prioritisation model for imported feeding stuffs, thus ensuring that funded activity will be targeted where it is most needed in 2015/16.

## 2.3 Key delivery partners within the FDP and their roles and responsibilities

### 2.3.1 The National Trading Standards (NTS)

2.3.1.1 One of the main areas of improvement recognised by the FVO was the need to influence LAs in respect of their role as Enforcement Authorities for official feed controls. The organisation ideally placed to deliver the required changes was the NTS<sup>14</sup>, established in 2012, by the government, as part of its changes to the bodies responsible for consumer protection and advice and governed<sup>15</sup> by a Board<sup>16</sup> of senior and experienced local government heads of LA services.

2.3.1.2 Discussions on the potential for NTS to lead and coordinate, on behalf of all LA Enforcement Authorities, a series of initiatives to deliver improvements to LA delivery of official feed controls led to the 3 year MOU between the FSA, NTS and the Trading Standards Institute Ltd which sets out the general principle of collaboration between the three parties and provides a specific framework for the delivery of initiatives for a 3 year period from April 2014 to March 2017, including financial arrangements.

2.3.1.3 A number of governance groups operate to make decisions about specific areas of delivery and funding within NTS one of which is the Feed Grant Governance Group (FGG) established to govern the England FDP on its behalf.

2.3.1.4 The FDP includes risk-based inspections of feed businesses, checks of imported feed; coordinated sampling for surveillance and – in response to specific risks – promotes regional coordination and knowledge sharing.

### 2.3.2 Feed Governance Group (FGG)

2.3.2.1 The NTS has mandated FGG to govern the England FDP on its behalf. FGG is a group of NTS Board members and senior officials from the FSA. The group makes strategic decisions on implementation of the FDP and agrees budgets, grant allocations and delivery plans.

2.3.2.2 The FGG is responsible for:

- Ensuring effective performance and financial management and timely reporting of the agreed activities;
- The accuracy and probity of performance and financial reports and for the competency and development of the programme;
- Seeking out, and communicating, examples of innovative and good practice in feed delivery;
- Using its connections and influence to try to ensure engagement in the delivery programme in all local feed authorities;

<sup>14</sup> <http://www.nationaltradingstandards.uk/>

<sup>15</sup> [NTS Governance](#)

<sup>16</sup> [NTS Board](#)

- Developing a portfolio of work to be delivered annually under the MOU;
- Referring LAs, who fail to meet their delivery requirements as a local feed authority, to the FSA for their decision on use of directional powers;
- Ensuring efficient management of all the projects involved, provide assurance that the key objectives are being met and that the projects are proceeding in accordance with their Work Plans;
- Using the skills and expertise of the FSA, National Agricultural Panel (NAP) and the National Animal Feed Ports Panel (NAFPP) as appropriate; and
- Reviewing the working of the MoU and take opportunities to improve its effectiveness.

2.3.2.3 Annex 3 details the annual portfolios of work for 2014/15, 2015/16 and 2016/17 agreed by FGG.

### **2.3.3 NTS Feed Delivery Programme Manager**

2.3.3.1 The FDP has a designated programme manager, supported by a programme officer, who has responsibility for the day-day planning, monitoring and co-ordination of the regional feed delivery programme (including improvement projects). Other key responsibilities include:

- Being responsible for the oversight of the feed grant budget and delivery of annual work plan;
- Managing liaison with and providing support for the NTS Feed Governance group;
- Identifying, anticipating and responding to policy developments and new strategic issues affecting the feed work of NTS;
- Contributing to the development of networks and partnerships that are of value to NTS and work to maintain a positive reputation for the NTS with LAs, central government, partners and stakeholders including the FSA; and
- Managing the delivery of improvement projects.

### **2.3.4 National Agriculture Panel (NAP) & National Feed Ports Panel (NAFPP)**

2.3.4.1 The National Agriculture Panel (NAP) is an expert panel of LA officers with significant knowledge and experience in animal feed enforcement. NAP members consists of feed leads from each of the nine English regions, the FSA (England/Scotland and Wales), Public/Agricultural Analysts, Veterinary Medicines Directorate (VMD), Animal and Plant Health Agency (APHA) and Chartered Institute of Trading Standards (CTSI).

2.3.4.2 The National Animal Feeds at Ports Panel (NAFPP) is another expert panel of LA officers. The panel members have significant knowledge and experience, in animal feed enforcement at points of entry.



2.3.4.3 Both groups meet twice a year and minutes of meetings are posted on the National Agriculture Community knowledge hub forum. Their main purpose is to provide technical and operational policy support to LAs in the UK by helping coordinate enforcement and good practice and providing specialist and expert advice always having in mind the need to reduce LA burdens, burdens on business, drive consistency of official controls and outcomes in respect of safeguarding animal and human health. They also advise FGG when needed on operational and technical issues which might impact on the delivery programme. Both the NAP and NAFPP operate to terms of reference.

2.3.4.4 A local government framework for resolving enquiries on feeding stuffs, feed hygiene, feed labelling, feed composition, etc. has been established to ensure that officers attempt to resolve issues at the lowest discussion group prior to escalating to NAP/NAFPP.

2.3.4.5 The primary roles of NAP/NAFPP members are:

- Highlight strategic issues that require national discussion;
- Input into discussions with FSA officials on emerging issues and operational issues;
- Have a good working knowledge and experience in at least one of the required areas of law that the NAP/NAFPP has responsibility for;
- Get support for their membership from their LA/organisation and relevant regional groups;
- Be able to commit the necessary time to participate in the group's activities, including participating in the Knowledge Hub;
- Act as a regional contact in relation to the areas of law that the NAP/NAFPP has responsibility for;
- Input into consultation responses;
- Escalate unresolved queries from regional groups and draft opinions to be agreed by NAP when appropriate;
- Provide legal interpretation on existing legislation;
- Assist with the preparation of guidance / leaflets to support LA delivery and consistency of official controls;
- Identify and discuss future priorities and issues; and
- To exchange information to facilitate closer co-operation between different agencies.

2.3.4.6 Technical policy support for the panels is provided by ACTSO as part of the NTS delivery programme.

## 2.3.5 Regional Feed Leads

2.3.5.1 The regional feed lead is an operational feed expert whose role is to ensure that the principles of delivery of the feed programme, and the reasons behind them, are understood by the constituent authorities and that all LAs are effectively engaged. Each region receives £25,000 annually for this co-ordination.

2.3.5.2 A list of key responsibilities was agreed by FGG for regional feed leads which are detailed in table 1. Each of the nine individual regions are different: in that the range of feed businesses differs; will cover a geographic area with its own opportunities and obstacles; and include a unique set of LAs. In consideration of this, the list of regional coordination responsibilities to be carried out by the regional lead(s) does not dictate *who* should deliver each requirement, the level of resources needed or how the funding should be shared as some roles may well be delivered or shared with the [regional co-ordinator](#).

**Table 1: Key Responsibilities of Regional Feed Leads**

Funding submissions and reporting	Promoting competent and consistent delivery into the future	Supporting successful delivery
<ul style="list-style-type: none"> <li>• Collating the regional funding bid within the agreed timescales.</li> <li>• Working with LAs in the region to achieve consistency and minimise discrepancies in funding submissions.</li> <li>• Oversight of delivery against funding submissions. The responsibility for delivery against agreed targets by each LA remains with the relevant Head of Service; however, work should take place at a regional level to ensure that any risks or changes to the agreed delivery programme are identified early.</li> <li>• Collate and submit the NTS quarterly feed delivery claim form.</li> <li>• Collate and submit the quarterly earned recognition reports (as part of the claim form), helping LAs to understand the need for meaningful information and working to ensure information returned is consistent both regionally and nationally.</li> <li>• Supporting the timely return of other reports and data as agreed by the Feed Governance Group and / or the NAP and NAFPP.</li> <li>• Encourage timely submission of results for any specific NTS project, particularly nationally coordinated sampling work and collate a regional report where appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop an understanding of regional competency and the consequent current training needs and future risks.</li> <li>• Develop a regionally agreed approach to address any competency gaps, mitigate any future risks and encourage consistency. This could include appropriate training, desktop work on consistency or joint inspections.</li> <li>• Introduce a working model that enables LAs in the region to easily access technical advice.</li> <li>• Identify and respond to concerns about consistency.</li> <li>• Share best practice and interesting case studies on the Knowledge Hub and through NAP/NAFPP.</li> </ul>	<ul style="list-style-type: none"> <li>• Provide contact details for a named Lead Feed Officer to NTS programme office, to be shared with LAs and delivery partners regionally and nationally.</li> <li>• The Regional Feed Lead will be expected to have working and technical knowledge of feed related work in order to actively take part in regional and national debates about feed. Where responsibility for the lead role is split, such as between inland feed work and imported work, the specific nature of each officer's area of expertise will be made clear.</li> <li>• The Regional Feed Lead will be expected to actively contribute to Knowledge Hub discussions, providing support to others and sharing useful information throughout the region.</li> <li>• Identify a named regional contact to provide active representation on the NAP/NAFPP and share findings and guidance.</li> <li>• Establish an agreed approach to regional meetings about feed and how day to day communication across the region will take place.</li> <li>• Ongoing promotion of follow up action with businesses, including results of samples taken under the nationally coordinated programme.</li> </ul>

### 2.3.6 Regional Co-ordinators

2.3.6.1 There are nine regional co-ordinators, one for each of the English regions who work to support the role of the Regional Feed Lead(s) and LA lead feed officers. These co-ordination roles are pivotal in supporting professional networks, assisting in the development of regional working and initiatives, ensuring effective communication throughout the network and promotion of consistency and good practice amongst LA regulatory service providers and other professionals including licensing, trading standards and environmental health.

### 2.3.7 Lead Feed Officer

2.3.7.1 The lead Feed Officer is defined in the Code to mean *'the Authorised Officer, appointed by the Authority in relation to feed who demonstrates the requirements, set out in the competency framework set out in the Code<sup>17</sup> and has the necessary experience in relation to the complexity, nature and types of feed business within the authority's area to be able to advise other officers where necessary'*.

2.3.7.2 The LA appointed Lead Feed Officer must:

- Have a good knowledge and understanding of the nature and type of feed establishments that operate in the authority's area;
- Understand the common hazards and risks associated with the feed processes and technologies in operation at these establishments;
- Be able to apply appropriate control measures, including enforcement sanctions;
- Apply the requirements of this code;
- Be involved in the assessment of other officers competency; and
- Comply with the competency requirements for Lead Feed Officers in the Code.

2.3.7.3 A Lead Feed Officer may be an officer employed by another authority provided they meet the necessary competency requirements for the area or areas to which they have been appointed as Lead Feed Officer. This will facilitate regional working and sharing of knowledge. This is of particular benefit to LAs with low numbers of feed business operators (FeBOs) in their area.

2.3.7.4 The Lead Feed Officer may or may not also be the Regional Feed Lead for the purposes of the NTS FDP.

## 2.4 Feed Officer Training Programme

2.4.1 The FSA funds a programme of feed law training for LA officers<sup>18</sup>, mostly through the provider ABC Food Law Ltd<sup>19</sup>. The aim of the training is to provide quality, free of

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<sup>17</sup> Chapter 3 and Annex 1 to the Feed Law Code of Practice (England)

<sup>18</sup> <https://www.food.gov.uk/enforcement/enforcetrainfund>

<sup>19</sup> <http://www.abcfoodlaw.co.uk/about-us/>

charge update training for enforcement officers which supports CPD requirements set out in the Code<sup>20</sup>/Practice Guidance<sup>21</sup>. The minimum number of CPD hours should be 10 hours per year based on the principles of continuing professional development. The following training courses are currently available:

1. [Animal Feed Earned Recognition](#)
2. [Feed Safety Management in Food Businesses](#)
3. [Labelling of animal feed](#)
4. [Lead Feed Officer](#)
5. [Sampling of animal feed](#)
6. [Feed Enforcement Powers](#)
7. [Systems to minimise carryover](#)
8. [HACCP in feed establishments](#)

2.4.2 There are also two interactive e-learning courses for feed that have been developed by SWERCOTS with funding from the FSA; '[Feed Hygiene for Primary Production](#)' and '[Feed Controls at Point of Entry](#)'.

## 2.5 Knowledge Hub - National Agriculture Community

2.5.1 The [Knowledge Hub](#) is a place where members can connect, exchange knowledge, ideas, insight and experience to improve public services. All LA officers engaged in feed law enforcement are expected to engage with the Knowledge Hub - National Agriculture Community.



### National Agriculture Community 434 members

**Started:** Mar 2012  
**Facilitators:** [Jonathan Davies](#), [John Stewart](#), [Colin Maxwell](#), [Vicki Gracie-Langrick](#), [Gwyneth Rogers](#)

This group is for local authority officers and other Government delivery partners with an interest in feed, imported feed, primary production and fertilisers. It supports the daily work of officers involved in all aspects of feed hygiene, including work under the NTS Feed Delivery Programme. All information associated with the Programme, along with papers and guidance produced for the National Agriculture Panel (NAP) and National Animal Feed at Ports Panel (NAFPP) are shared here.

2.5.2 A comprehensive library<sup>22</sup> of information, model inspection forms, guidance and examples of best practice developed for feed officers, including the minutes of previous NAP/NAFFPP meetings, has been published by NTS, NAP and NAFPP through the Association of Chief Trading Standards Officers (ACTSO) to support the delivery of feed hygiene controls by local authorities in England under the NTS Feed Delivery Programme.

<sup>20</sup> Sections 3.4 and 3.5 of the Feed Law Code of Practice

<sup>21</sup> Section 3.4 and 3.5 of the Feed Law Practice Guidance

<sup>22</sup> <https://khub.net/group/nationalagriculturecommunity/library>

## 3 Earned Recognition and Alternative Enforcement Strategies

### 3.1 Introduction

- 3.1.1 The revised Code, which was published in May 2014, included the concept of earned recognition. This is where FeBOs, who demonstrably maintain high standards of feed safety by taking appropriate steps to comply with the law, may have these standards recognised by the Competent Authority when determining the frequency of their official controls. At the same time a new delivery model for animal feed official controls was put in place, which also embedded the concept of earned recognition.
- 3.1.2 The Code introduces two types of earned recognition, identified below as ‘**Type 1**’ and ‘**Type 2**’.
- **Type 1: Earned Recognition** shall be applied to FeBOs who are membership of a Food Standards Agency Approved Assurance Scheme (FSA AAS) and are able to demonstrate a minimum of ‘Satisfactory’ compliance” under the FSA risk rating scheme or a minimum of ‘Medium’ likelihood of compliance under the ACTSO risk assessment scheme. An up to date list of approved schemes is available at <http://www.food.gov.uk/business-industry/farmingfood/animalfeed/animal-feed-activity-and-inspections-in-the-uk>. Earned Recognition for members of approved schemes takes the form of reduced inspection frequencies and the detail of these for each business type is in the Feed Law Code of Practice Guidance; and
  - **Type 2: Earned Recognition** shall be applied to FeBOs who are not members of a FSA AAS, but are able to demonstrate a minimum of ‘Broad’ compliance” under the FSA risk rating scheme or a minimum of ‘High’ likelihood of compliance” under the ACTSO risk assessment scheme. All feed businesses that meet these criteria will be subject to reduced inspection frequencies and the use of Alternative Enforcement Strategies (AES).
- 3.1.3 It is the FSA’s role as the central competent authority to assess individual assurance schemes which have applied for ‘approved’ status. When the FSA is confident that an assurance scheme meets the criteria a Memorandum of Understanding (MOU) will be agreed by the FSA with the assurance scheme FeBOs operators that qualify for earned recognition by being members of an approved assurance scheme<sup>23</sup> receive the lowest frequencies of inspections. Two such MOUs are currently in place between the FSA with [Assured Food Standards \(trading as Red Tractor \(RTA\)\)](#) and the [Agricultural Industries Confederation \(AIC\)](#).

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<sup>23</sup> Annex 3 of the Feed Law Practice Guidance

3.1.4 It is the LAs role to:

- assess whether feed businesses which are not members of an approved assurance scheme can be awarded earned recognition or have it removed if they are found not to be broadly compliant;
- assess whether individual feed businesses which have earned recognition as a member of an approved assured scheme is satisfactory or broadly compliant and can retain its reduced level of inspection; and
- ensure that any non-compliance is rectified in a timely way.

3.1.5 In those instances where the activity being undertaken in a particular sector is nominally risk-rated as low, the Code allows for the possibility of alternative enforcement strategies (AES). Earned recognition aims to reduce the burden on compliant businesses whilst concentrating enforcement activity at those businesses which are less compliant.

3.1.6 The use of AES at establishments which have earned recognition because they are broadly compliant but are not a member of an assurance scheme enables LAs to focus attention on those businesses which present the greatest risk to consumer safety and/or which are failing to meet their statutory obligations.

3.1.7 The use of AES can also assist in maintaining contact with feed businesses to enable advice and information to be provided as appropriate. It will also provide a mechanism for topic based coaching and education as businesses are able to request further feed safety information that may highlight a training need.

3.1.8 LAs are required to develop an AES which should explain how they will conduct official controls at premises where the use of AES is permitted. The use of AES at individual establishments must be alternated with an inspection visit (an official control), at the frequency required by the Code until such time the business loses earned recognition. Guidance to support LAs on how Earned Recognition applies to Feed Business Operators who are not members of an FSA Approved Assurance Scheme and the use of AES has been developed by the NAP.

3.1.9 The table at Figure 5 indicates the expected effect of the intervention risk-rating scheme on various types of establishments and indicates whether earned recognition through an approved assurance scheme or AES can be considered.

Figure 5: Showing the impact of earned recognition on frequency of inspections

<b>Business Description</b>	<b>Potential Approval/Registration Codes Applicable to the Business for illustrative purposes only</b>	<b>Poor Compliance</b>  Frequency of inspections Years	<b>Varying Compliance</b>  Frequency of inspections Years	<b>Satisfactory Compliance</b>  Frequency of inspections Years	<b>Broad Compliance or better</b>  Frequency of inspections Years / AES	<b>Earned Recognition</b>  for Members of Approved Assurance Schemes  Frequency of inspections years / % annual inspection sample
<b>Arable Farm</b>	R14	3	4	5	AES	2%
<b>Co-Product Producer</b>	R12	1	1	2	4	5
<b>Distributor</b>	All approved codes plus R1,R2,R3,R5,R7	2	4	5	AES	2%
<b>Importer</b>	Not applicable					
<b>Livestock Farms</b>	R13	3	4	5	AES	2%
<b>Manufacturer of additives or of feed using additives</b>	All Approved Codes plus R1, R2, R3 to R4 and R6	1	1	2	3	4
<b>Mobile Mixer</b>	R4	1	1	2	4	5
<b>On-Farm Mixer</b>	R10 or R11	2	4	5	AES	2%
<b>Stores</b>	R9	2	3	5	AES	2%
<b>Supplier of Surplus Food</b>	R7	2	4	5	AES	2%
<b>Transporter</b>	R8	2	4	5	AES	2%

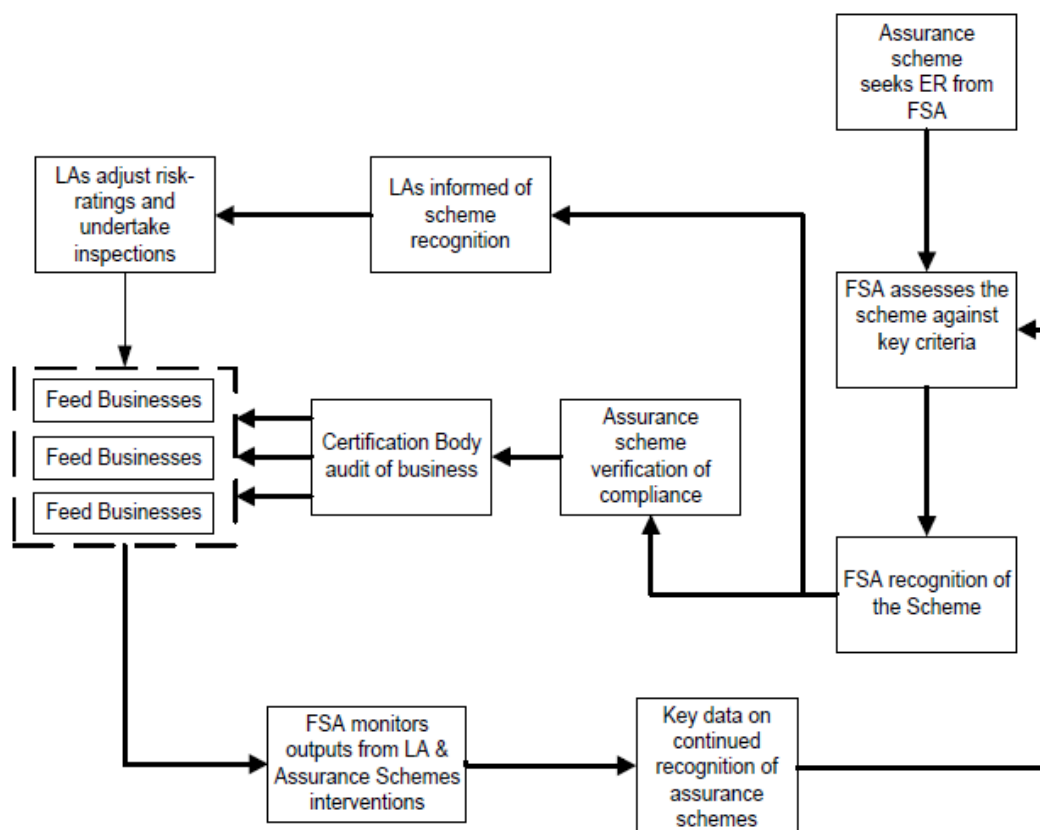


A list of approval and registration activities can be found here: - <http://food.gov.uk/business-industry/guidancenotes/hygguid/approvregfeedguidance>

### 3.2 The Process for an assurance scheme gaining earned recognition and verification

3.2.1 The process and criteria by which an assurance scheme obtains 'approved' status is set out in the flow chart below.

#### Flowchart 1: The process for gaining earned recognition and the verification process



3.2.2 The Practice Guidance pages 18 to 28 describe in detail the criteria for a scheme to be approved by the FSA in respect of:

- standard setting and mapping to relevant legislation;
- governance arrangements, including on-going;
- compliance and certification as well as processes for assessment and review;
- the assessment process;
- requirements in respect of scheme assessor authorisation and competence;
- data sharing and communications; and

- continue to meet such criteria.

- 3.2.3 When a LA becomes aware of a serious non-compliance or poor history of compliance associated with a FeBO, who is a member of an approved assurance scheme, and a decision is made to remove earned recognition, this must be notified to the FSA as soon as possible using the earned recognition [exception report](#) form. The form should be emailed to [feeddelivery@foodstandards.gsi.gov.uk](mailto:feeddelivery@foodstandards.gsi.gov.uk). This information is important in helping the FSA carry out its verification role of approved assurance schemes.
- 3.2.4 From time to time LAs may find minor non-compliances when auditing a feed business that qualifies for earned recognition. Providing the matter is not subject to enforcement sanctions and can be rectified immediately or within a reasonable timescale of being identified, earned recognition should not be removed. The LA will need to revisit and check that the matter has been resolved. Examples of minor and serious non-compliance(s) can be found in section 5.5.3 of the Practice Guidance.

## 4 Main Changes to the Code of Practice

### 4.1 Introduction

- 4.1.1 In response to the FSA Board recommendations in respect of the '[review of official animal feed controls](#)' in 2012 a revised [Code](#) was published in May 2014, issued under regulation 6 of the Official (Feed and Food Controls) (England) Regulations 2009. The Code is directed at LAs responsible for the delivery of official controls for feed as specified in the Animal Feed (Hygiene, Sampling etc. and Enforcement) (England) Regulations 2015.
- 4.1.2 European Regulation (EC) No 882/2004<sup>24</sup> on the official controls to ensure the verification of compliance with feed and food law sets out requirements with which Member States must comply when delivering feed controls. The Code explains how these requirements apply to LAs.
- 4.1.3 LAs are required to have regard to this Code when discharging their duties. LAs that do not have regard to relevant provisions of the Code could find their decisions or actions challenged, and evidence gathered during a criminal investigation potentially being ruled inadmissible by a court. The FSA can also, after consulting with the Secretary of State, give a Competent Authority a direction requiring them to take any specified steps in order to comply with the Code.
- 4.1.5 To assist LAs with the discharge of their statutory duty to enforce relevant feed law the FSA issued a Feed Law [Practice Guidance](#) (England) (updated June 2014) Feed Law Practice). It is non-statutory, complements the statutory Code of Practice, and provides general advice on Feed Law. It also takes account of recommendations

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<sup>24</sup> Regulation (EC) No 882/2004 on the Official Controls to ensure verification of compliance with food and feed law

made by the EU Feed and Veterinary Office (FVO) following their inspections of the UK's food and feed control services.

## 4.2 Main changes to the Code

4.2.1 Chapter 3 of the Code - Competency of Officers makes greater use of comprehensive competence-based criteria for the authorisation of officers carrying out official feed controls in primary production establishments and at points of entry such as port. Qualifications are a pre-requisite for the authorisation of officers except now for enforcement at primary production, import controls. Officers who only take samples are now not required to have a qualification. However, officers are required to meet the competency requirements.

4.2.2 The competency requirements form statements in the new Code<sup>25</sup> which cover the following areas:

- Lead Feed Officers;
- Inspection of feed establishments at primary production;
- Inspecting feed establishments required to comply with the feed hygiene requirements other than those at primary production;
- Official Controls at Points of Entry;
- Sampling of animal feed; and
- Use of Enforcement Powers.

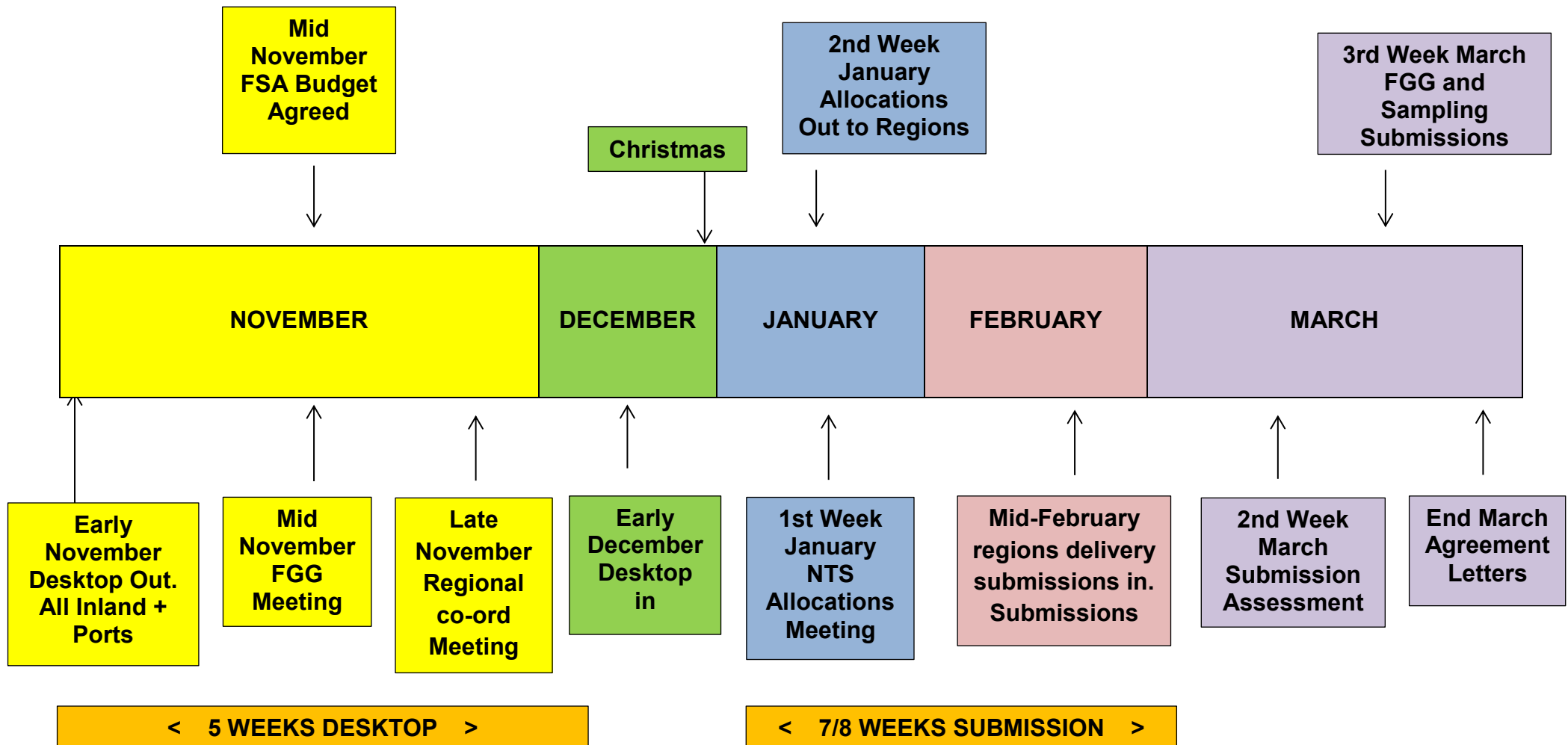
4.2.3 Chapter 5 of the Code - Organisation of Official Controls now requires a programme of planned inspections based on a revised risk-rating scheme which embeds the principles of earned recognition. Making increased use of earned recognition to allow those feed businesses who have consistently maintained high standards of feed safety with good management controls in place, to have these standards recognised by the regulator when deciding on the frequency of their official control checks. These arrangements give greater recognition to independent third party audits as part of membership of recognised FSA approved assurance schemes.

4.2.4 Chapter 4 of the Code - Communications now includes a requirement to liaise closely with those Competent Authorities responsible for food registration to identify food businesses placing surplus food into the feed chain. This will help ensure feed establishment registers are complete and that all feed businesses are included in the programme of planned inspections. A greater exchange of information with APHA and VMD on registered/approved establishments is also required.

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<sup>25</sup> Annex 1 of the Feed Law Code of Practice - Competency of Officers

NTS Delivery Timeline



Desktop Exercise Feed Establishments Spreadsheet Example

Desktop Exercise - Financial Year 2016/17																																					
Region	ACTSO	No of Feed Premises	Min Insp'ns Due	Inspections Planned	Minimum AES Due	AES Planned	COP Baseline = Satisfactory			Compliance - FSA Scheme / ACTSO Scheme																Assurance Scheme Members not visited to date				Other Premises not visited to date (non-AAS)							
							Feed Premises (from LA lists)	COP Freq. (years)	Ave Insp'ns Due	Poor Very Low				Varying Low				Satisfactory Medium				Broad High				AAS Member* Very High				No of Feed Premises	Frequency (years)	Min Insp'ns Due	Insp'ns Planned	No of Feed Premises	Frequency (years)	Min Insp'ns Due	Insp'ns Planned
										No of Feed Premises	Frequency (years)	Min Insp'ns Due	Insp'ns Planned	No of Feed Premises	Frequency (years)	Min Insp'ns Due	Insp'ns Planned	No of Feed Premises	Frequency (years)	Min Insp'ns Due	Insp'ns Planned	No of Feed Premises	Frequency (years)	Min Insp'ns Due	Insp'ns Planned	No of Feed Premises	Frequency (years)	Min Insp'ns Due	Insp'ns Planned								
<b>Inland Feed Inspections</b>																																					
Manufacturer A01-08 & R01-04	E1	3,105	1,077.2	0			0	2	0.0	0	1	0.0	0	115	1	115.0	0	713	2	356.5	0	414	3	138.0	0	897	4	224.3	0	23	3	7.7	0	943	4	235.8	0
Co Product Producer R12	E12	4,439	1,423.7	0			0	2	0.0	0	1	0.0	0	92	1	92.0	0	1,265	2	632.5	0	1,656	4	414.0	0	391	5	78.2	0	0	4	0.0	0	1,035	5	207.0	0
Mobile Mixer R04	E6	115	69.0	0			0	2	0.0	0	1	0.0	0	46	1	46.0	0	23	2	11.5	0	23	4	5.8	0	23	4	5.8	0	0	4	0.0	0	0	4	0.0	0
Importers	E10	23	11.5	0			0	2	0.0	0	1	0.0	0	0	1	0.0	0	23	2	11.5	0	0	4	0.0	0	0	5	0.0	0	0	4	0.0	0	0	5	0.0	0
Stores R09	E9	2,438	295.6	0	46.0	0	0	5	0.0	0	2	0.0	0	23	3	7.7	0	920	5	184.0	0	230	5 (AES)	46.0	0	690	2%	13.8	0	138	2%	2.8	0	437	5	87.4	0
Distributor A01-08, R01-03 & R05	E2	2,622	325.0	0	124.2	0	0	5	0.0	0	2	0.0	0	69	4	17.3	0	529	5	105.8	0	621	5 (AES)	124.2	0	391	2%	7.8	0	46	2%	0.9	0	966	5	193.2	0
Transporter R08	E9	4,416	454.3	0	161.0	0	0	5	0.0	0	2	0.0	0	23	4	5.8	0	1,265	5	253.0	0	805	5 (AES)	161.0	0	1,035	2%	20.7	0	460	2%	9.2	0	828	5	165.6	0
On Farm Mixer R10 & R11	E7	30,774	2,192.4	0	87.4	0	0	5	0.0	23	2	11.5	0	276	4	69.0	0	5,474	5	1,094.8	0	437	5 (AES)	87.4	0	20,631	2%	412.6	0	1,012	2%	20.2	0	2,921	5	584.2	0
Pet Food Manufacturer R06	E1	0	0.0	0	0.0	0	0	5	0.0	0	2	0.0	0	0	4	0.0	0	0	5	0.0	0	0	5 (AES)	0.0	0	0	2%	0.0	0	0	2%	0.0	0	0	5	0.0	0
Supplier of Surplus Food R07	E4	13,179	2,063.6	0	469.2	0	0	5	0.0	0	2	0.0	0	92	4	23.0	0	3,059	5	611.8	0	2,346	5 (AES)	469.2	0	437	2%	8.7	0	161	2%	3.2	0	7,084	5	1,416.8	0
<b>Total Inland Feed Premises/Inspections</b>		<b>56,672</b>	<b>7,912.2</b>	<b>0</b>			<b>0</b>		<b>0.0</b>	<b>23</b>		<b>11.5</b>	<b>0</b>	<b>736</b>		<b>375.7</b>	<b>0</b>	<b>13,271</b>		<b>3,261.4</b>	<b>0</b>	<b>2,093</b>		<b>557.8</b>	<b>0</b>	<b>24,495</b>		<b>771.9</b>	<b>0</b>	<b>1,840</b>		<b>44.0</b>	<b>0</b>	<b>14,214</b>		<b>2,890.0</b>	<b>0</b>
<b>Total Inland Feed Premises/AES</b>		<b>4,439</b>			<b>887.8</b>	<b>0</b>																<b>4,439</b>		<b>887.8</b>	<b>0</b>												
<b>Total Inland Feed Premises</b>		<b>61,111</b>																																			
<b>Food Hygiene at Primary Production Inspections</b>																																					
Livestock Farms R13	E9	231,334	3,729.6	0	25,479.4	0	0	5	0.0	184	3	61.3	0	1,725	4	431.3	0	6,647	5	1,329.4	0	22,977	5 (AES)	4,595.4	0	28,451	2%	569.0	0	66,930	2%	1,338.6	0	104,420	5	20,884.0	0
Arable Farms R14	E4	76,130	725.8	0	10,299.4	0	0	5	0.0	46	3	15.3	0	69	4	17.3	0	1,127	5	225.4	0	3,542	5 (AES)	708.4	0	3,542	2%	70.8	0	19,849	2%	397.0	0	47,955	5	9,591.0	0
<b>Total FH @ PP Premises/Inspections</b>		<b>128,570</b>	<b>4,455.4</b>	<b>0</b>		<b>0</b>			<b>0.0</b>	<b>230</b>		<b>76.7</b>	<b>0</b>	<b>1,794</b>		<b>448.5</b>	<b>0</b>	<b>7,774</b>		<b>1,554.8</b>	<b>0</b>				<b>31,993</b>		<b>639.9</b>	<b>0</b>	<b>86,779</b>		<b>1,735.6</b>	<b>0</b>					
<b>Total FH @ PP Premises/AES</b>		<b>178,894</b>			<b>35,778.8</b>	<b>0</b>																<b>26,519</b>		<b>5,303.8</b>	<b>0</b>									<b>152,375</b>		<b>30,475.0</b>	<b>0</b>
<b>Total Food Hygiene at Primary Production Premises</b>		<b>307,464</b>																																			

Portfolio of Work for 2014-15

Objective 1	To ensure that the Animal Feed inspection and sampling programme funded by FSA grant in 2014-15 delivers effective official controls which: <ul style="list-style-type: none"> <li>– Provide value for money</li> <li>– Achieve the FSA’s priorities as defined in the national control plan</li> <li>– Are based on addressing risk across the regions, as defined in the revised Code</li> <li>– Meet the quality requirements of the FVO</li> </ul>
NTS Deliverable 1	To create, oversee and administer an Animal Feed inspection and sampling programme which is funded by the FSA in the financial year 2014-15
Timescale	Programme delivered by 31st March 2015
Objective 2	To consider funding for controls at ports as a whole; including investigating the best way to allocate funding and considering the most effective mechanism of delivering controls at ports
NTS Deliverable 2	To undertake a review of the current funding allocations for 3rd Country import controls in respect to identifying the most effective delivery mechanism. Produce a report showing the recommended options
Timescale	Project completed by 30th November 2014
Objective 3	To develop a strategy to ensure a number of suitably qualified and competent officers, as defined in the revised Code, are in place to undertake and oversee the delivery of animal feed official controls and subsequent enforcement work regionally
NTS Deliverable 3	To investigate and make recommendations on the best way to ensure competent officers are in place where needed, and that lead officers are in place to supervise and/or monitor on a regional basis
Timescale	Strategy developed by 31st March 2015.
Objective 4	To promote consistency and quality on the delivery of animal feed official controls throughout England
NTS Deliverable 4	Build on each region’s current collaboration working by promoting the use of regional feed officer networks. Promote consistency by promoting use of model documents and the identification and sharing of best practice
Timescale	Promotion of the use of the revised model documents by 31st July 2014  Promotion of the use of the regional feed officer networks by 31/3/15  Identification and promotion of best practice – ongoing

## Portfolio of Work for 2015-16

Objective 1	To ensure that the Animal Feed inspection and sampling programme funded by FSA grant in 2015-16 delivers effective official controls which: <ul style="list-style-type: none"> <li>• Provide value for money</li> <li>• Achieve the FSA's priorities as defined in the national control plan</li> <li>• Are based on addressing risk across the regions, as defined in the revised Code</li> <li>• Meet the quality requirements of the FVO</li> </ul>
NTS Deliverable 1	To create, oversee and administer an Animal Feed inspection and sampling programme which is funded by the FSA in the financial year 2015-16
Timescale	Programme delivered by 31 <sup>st</sup> March 2016
Objective 2	To promote consistency and quality on the delivery of animal feed official controls throughout England
NTS Deliverable 2	Build on each region's current collaboration working by promoting the use of regional feed officer networks. Promote consistency by supporting the deployment of the work completed in 2014-15 on Officer Capacity and Competency and by holding an officer level event to communicate the outcome of the 2014-15 NTS project on the Level Of Current Compliance
Timescale	March 2016
Objective 3	For 2014/15 undertake other projects as prioritised and directed by the Feed Delivery Governance Group within the funding for 2015-16
NTS Deliverable 3	As determined by FGG.
Timescale	As determined by FGG.

## Portfolio of Work for 2016-17

Objective 1	<p>To ensure that the Animal Feed inspection and sampling programme funded by FSA grant in 2016-17 delivers effective official controls which:</p> <ul style="list-style-type: none"> <li>• Provide value for money</li> <li>• Achieve the FSA's priorities as defined in the national control plan</li> <li>• Are based on addressing risk across the regions, as defined in the revised Code</li> <li>• Meet the quality requirements of the FVO</li> </ul>
NTS Deliverable 1	<p>To create, oversee and administer an Animal Feed inspection and sampling programme which is funded by the FSA in the financial year 2016-17</p> <p>The work of NTS to be delivered in line with the programme of deliverables set out in the Financials Template</p>
Timescale	Programme delivered by 31 <sup>st</sup> March 2017
Objective 2	To promote consistency and quality on the delivery of animal feed official controls throughout England
NTS Deliverable 2	<p>Build on each region's current collaboration working by promoting the use of regional feed officer networks</p> <p>Ensure that regional feed leads fulfil their responsibilities in line with the programme of deliverables</p>
Timescale	By end March 2017
Objective 3	For 2016/17 undertake other projects as prioritised and directed by the Feed Delivery Governance Group within the funding for 2016-17. Projects will be considered on a case by case basis and the final decision on funding will rest with the FSA's Investment Board on consideration of an appropriate business case
NTS Deliverable 3	As determined by FGG
Timescale	As determined by FGG