



To:

Heads of Environmental Health Service (England)
Directors of Trading Standards Services (England)

cc: CIEH, TSI

Date: 8 September 2016

ENF Ref: ENF/E/16/050

Subject: Consultation on Risk Based Primary Production Food Hygiene Inspections	
FOR INFORMATION/POSSIBLE ACTION	Category: <ul style="list-style-type: none">○ Hygiene○ Standards
Action requested: <p>Following an EC audit, the FSA is developing a risk profile for enforcement authorities to deliver a prioritised risk based and proportionate primary production official controls inspection programme. The FSA would like to invite comments from enforcement delivery authorities on factors affecting primary production official controls inspections in their regions – see questions at Annex 1.</p>	

Dear Colleague,

Please bring this letter to the attention of all relevant officers in your Authority.

A European Commission audit (2015-7456) evaluating the system of official controls relating to microbial safety of primary production of food of non-animal origin (FNAO) in the UK was published in April 2016. The link to the report is at:

http://ec.europa.eu/food/audits-analysis/audit_reports/details.cfm?rep_id=3606

One of the recommendations was to ensure that official controls adequately take into account identified risks to food safety. In response to this, FSA England, Northern Ireland and Wales are working jointly to develop a risk profile highlighting the most significant risks associated with FNAO primary production. This will include fresh produce which is ready to eat, but will not include sprouting seeds as these establishments have already been prioritised for inspection and approval.

There have been a number of high profile outbreaks over the last few years attributable to the consumption of fresh produce. For example most recently in June 2016 in the UK, an outbreak with 161 cases confirmed (including 2 deaths where the infection was a

contributory factor) from a rare strain of E. coli associated with eating mixed salad leaves.

It is hoped that the risk profile will assist enforcement authorities to deliver a prioritised, risk based and proportionate inspection programme of food hygiene official controls at primary production, to be implemented from April 2017. The risk profile will need to be considered alongside the priorities for feed hygiene on-farm to determine the overall inspection programme for these premises. The prioritisation of food hygiene controls at primary production level will enable increased consumer protection. As enforcement authorities integrate the risk profile and inspection programmes for food hygiene with those for other primary production controls they will achieve efficiencies while limiting inspection burdens on businesses.

In recognition of the experience and knowledge of our local delivery enforcement authorities, we are writing to consult you for your opinions on the factors and issues in the attached Annex.

I would appreciate if responses could be returned to the representative for your country by 7th October 2016. (See names below). Following robust consultation it is our intention to publish the enforcement priorities based on the risk profile as part of our National Feed Enforcement Priorities. Should you seek any further clarification about any of the points in this letter please contact:

Jane Tait (FSA England) Jane.Tait@foodstandards.gsi.gov.uk

Jonathan Davies (FSA Wales) Jonathan.Davies@foodstandards.gsi.gov.uk

Gerard Smyth (FSA NI) Gerard.Smyth@foodstandards.gsi.gov.uk

Your assistance is very much appreciated.

Yours faithfully

Jane Tait

Tel 07917 070440

Annex 1

FSA Consultation on Risk Based Primary Production Food Hygiene Inspections

Name and Role of Consultee	
Email address and contact telephone number	
Local Authority	
Date	

1. Your background information.

Q1a) Is yours a Unitary/County/District/Other Authority? Please state which:

Q1b) If you are in a 2 tier area do you think the proposed official controls of FNAO primary production are most likely to be carried out at district or county level? Please briefly explain your answer.

Q1c) How many establishments in your area do you estimate grow fresh produce? (for each of the types listed in the proposed highest priority list in section 3 below)

Q1d) Of these, how many are already part of your planned inspection programme.

Q1e) If known, as a total or percentage, approximately how many fresh produce establishments have earned recognition through an assurance scheme membership? (limited to those in section 3)

Q1f) If known, as a total or percentage, approximately how many fresh produce establishments are there in your area which have not yet been inspected? (limited to those in section 3)

Q1g) What would be the impact of the prioritised official controls inspection programme for fresh produce on your workload/resources?

Q1h) Can you briefly state how you would manage that impact on workload/resources?

2. Factors affecting risk.

We consider the following risk factors should be taken into account when planning inspections and carrying out food hygiene primary production official controls:

- Size and nature of establishment
- Whether the FBO is a member of an assurance scheme, or they have earned recognition through broad compliance
- History of compliance
- Type of water supply for application and irrigation
- Use of untreated or insufficiently treated manure or compost

Q2a) Do you agree with these risk factors?

Q2b) Are there any other risk factors you consider should be taken into account not considered here?

3. Fresh produce risk profile

Following an intelligence-led and desk top profiling exercise, including taking account of European Food Safety Authority (EFSA) opinions, <http://www.efsa.europa.eu/en/press/news/150313> EU Better Training Safer Food training documentation on risk based official controls, and policy colleagues opinions, we have identified that growers of the following fresh produce are likely to be highest priority for inspection in the UK.

- 'leafy greens' (eg salad leaves, micro shoots, watercress, fresh herbs etc.)
- stem and bulb vegetables, (eg radishes, celery, salad onions),
- berries (eg strawberries, raspberries),
- tomatoes

Q3a) Do you agree with this assessment?

Q3b) Are there any other groups of fresh produce you think should be included which are not included here? What are your reasons?

Q3c) Are there any groups in the list above which you think do not need to be prioritised for inspection? What are your reasons?

4. Support and guidance

We are also consulting if there is a need to provide any update support for enforcement authorities through training, updated guidance and website information. We are also reviewing the inspection aide memoire.

Q4a) What guidance and/or training would be helpful to support you in undertaking food hygiene primary production official controls in your area?

5. Other comments

Do you have any other comments at this stage which might assist in the development of the risk profile outlined above?

I would appreciate if responses could be returned to the representative for your country by 7th October 2016.

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