

ADVISORY COMMITTEE ON ANIMAL FEEDINGSTUFFS

76th Meeting of ACAF on 28 June 2018

Discussion paper

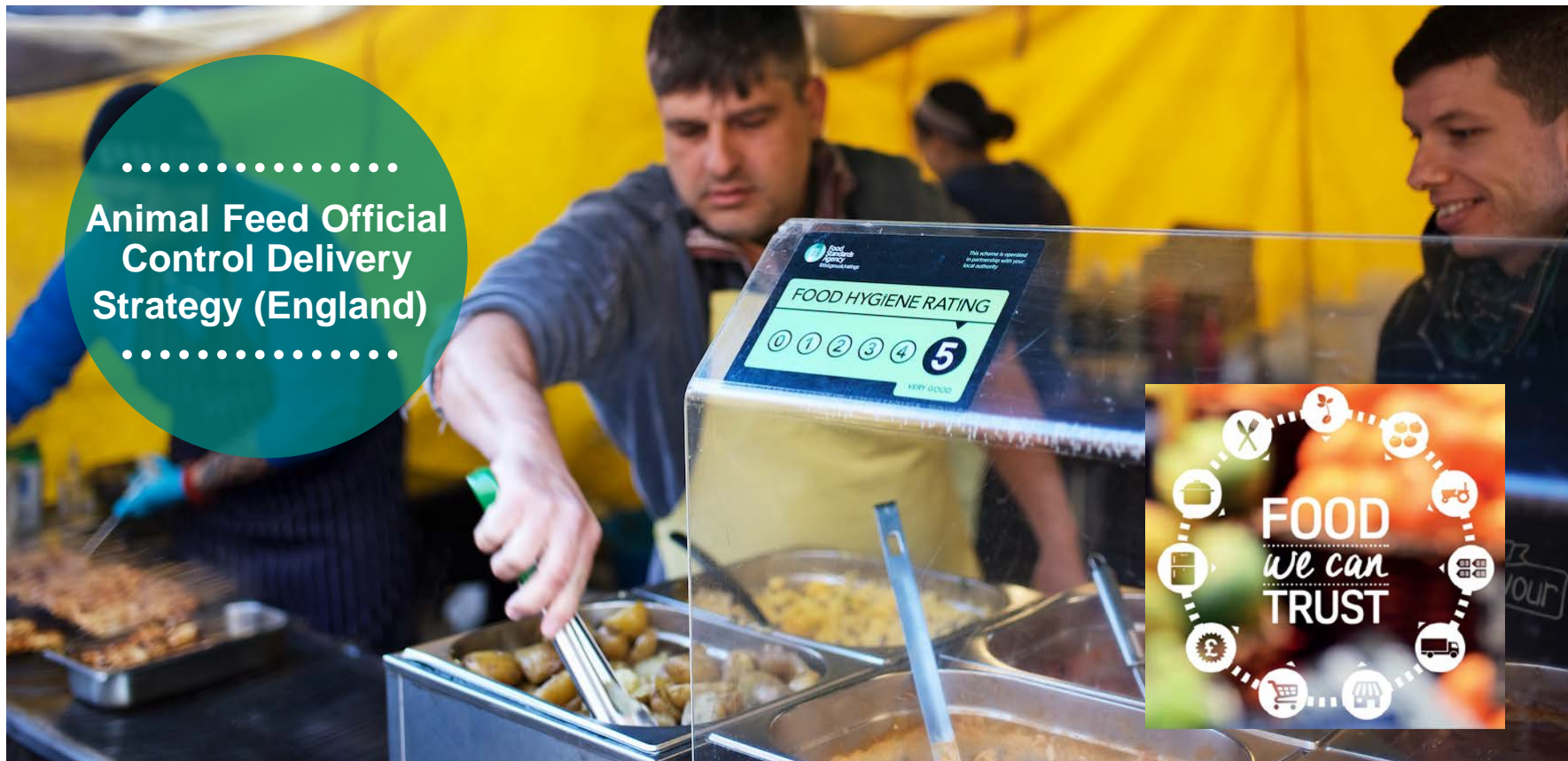
Animal Feed Official Control Delivery Strategy

Mrs Julie Benson

Food Standards Agency

June 2018

.....
**Animal Feed Official
Control Delivery
Strategy (England)**
.....



Animal Feed Delivery Strategy 2017/18 to 2020/21

Approach to Delivery

Honest – being open and transparent in our communications

Resilient – adapting quickly and effectively to fast-paced changes

Accountable – taking responsibility for our actions

Empowered – prepared to take the initiative and make decisions

Professional – Acting with integrity and impartiality

Guiding Principles

Effective engagement and communication

Deliver value for money

Innovation

Objectives

To drive a flexible and intelligence led approach to official controls

- Focusing resources on higher risk and non-compliant business, placing an increased focus on outcomes

Safeguard public and animal health

- By setting modern regulatory standards for controls and ensuring their effective and consistent delivery

Manage public money responsibly

- To deliver our statutory responsibilities

Build resilience and capability

- To sustain an effective programme of official feed controls

Anticipate, plan for and deliver the consequences of exiting the EU

- Protecting our export market and enabling the feed industry to continue to trade globally

Key Elements of the Strategy

Deliver effective, consistent, risk-based proportionate official feed controls

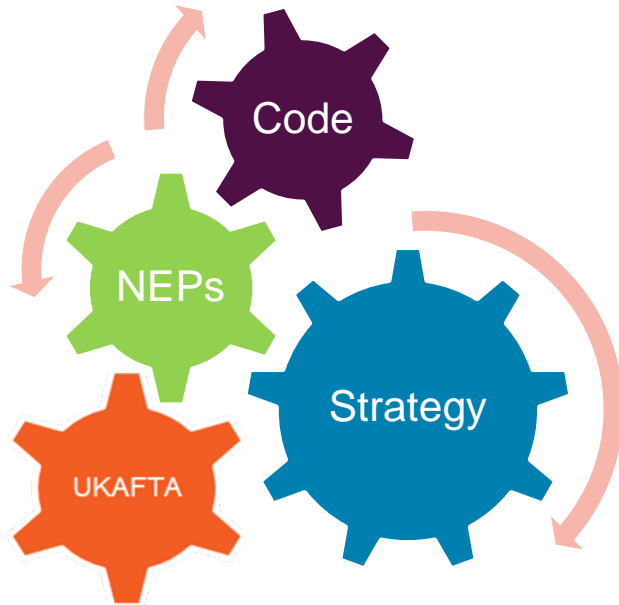
Maximise the use of Intelligence

Strengthen the systems and processes of approval of third party assurance schemes

Improve resilience and capability

Safeguarding public and animal health by driving up sustained improvements in business compliance through intelligence led enforcement

Why is the Strategy needed?



FSAs direct response to the need to develop an innovative and radically different ‘whole system’ approach to the delivery of official feed controls in line with our ambition to be an ‘excellent accountable modern regulator’

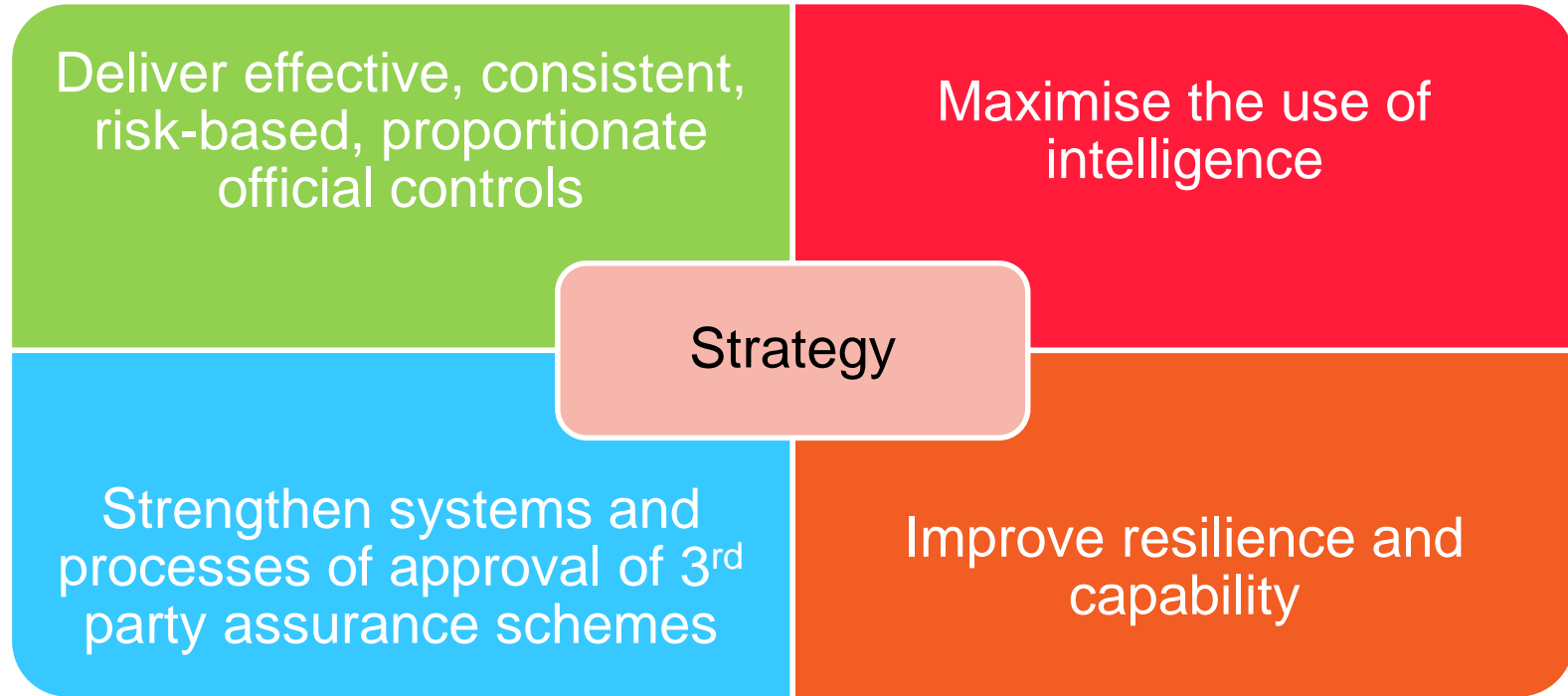
What is our vision?

Food We Can Trust

Safeguarding public and animal health by driving up sustained improvements in business compliance, through intelligence led enforcement



What are the key elements of the Strategy?



How will we deliver our strategy?

Guiding Principles

- Effective engagement and communication
- Deliver value for money
- Innovation



Our Approach to Delivery

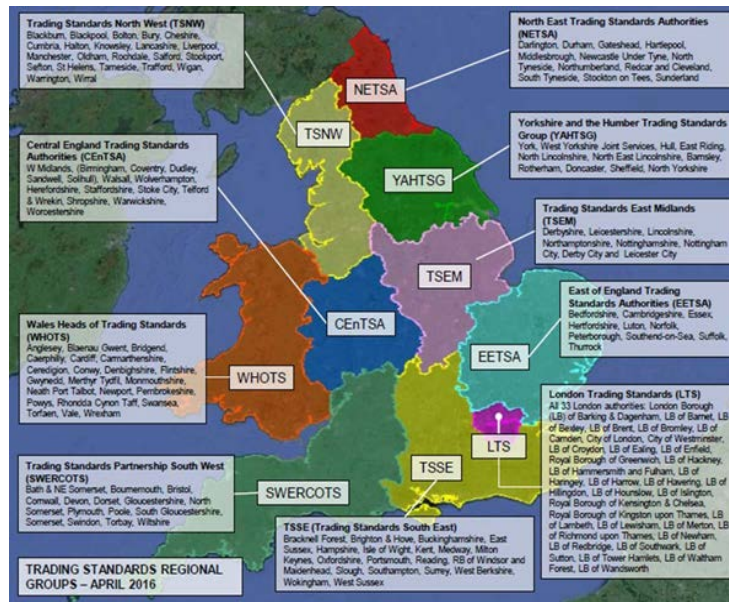
- Honest
- Resilient
- Accountable
- Professional standards
- Empowered

Who are our key partners?



Office for Product
Safety & Standards

Part of [Department for Business, Energy & Industrial Strategy](#)



Animal &
Plant Health
Agency



Veterinary
Medicines
Directorate

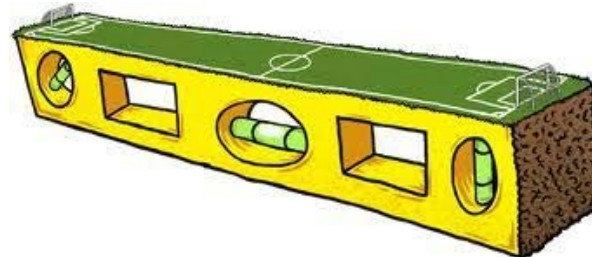
Feed Industry



What will success look like?



- Realisation of the FSAs strategic goal 'Food We Can Trust'
- Intelligence led enforcement
- Transformation of the system of regulation
- A level playing field for honest and diligent FeBOs
- Strong trade
- Strong collaboration
- Improved quality and consistency of official controls
- Reduction of unnecessary burdens on business



.....

How might industry support our vision?

‘Safeguarding public and animal health by driving up sustained improvements in business compliance, through intelligence led enforcement’

.....

ANY QUESTIONS?

.....

Food Standards Agency

Animal Feed Official Control Delivery Strategy (England) 2017/18 to 2020/21

This document sets out the FSAs 4-year Official Feed Control Delivery Strategy for 2017/18 – 2020/21. It describes how we aim to drive up sustained improvements in levels of compliance through intelligence led enforcement to safeguard public and animal health

Author: Julie Benson

Role: Animal Feed Delivery Manager

Email: julie.benson@food.gov.uk

Mobile: 07500951312

Document History			
Version	Date	Author	Action/Change
1	16-04-2018	Julie Benson	Published through FSA Smarter Communications. Action plan updated to reflect progress to date.

Contents

Why is this strategy needed?	4
Where do we want to be by 2021?	5
What are the key elements of this strategy?	5
What are our objectives?	5
Our Guiding Principles	5
Our Values	6
Our Approach to Delivery	6
What are our Value Propositions?	6
How will we get there?	8
Annex 1: Risk Log	16

Why is this strategy needed?

This strategy is the Food Standards Agency's (FSA) direct response to the need to develop an innovative and radically different 'whole system' approach to the delivery of official feed controls in line with the FSA's ambition to be an 'excellent accountable modern regulator':

The strategy has been developed in recognition of:

- Our primary responsibility and accountability to the consumer in protecting public and animal health;
- The need to modernise delivery of official controls in a way that achieves value for money;
- The evolving approach to modern regulation considering the FSA's [Regulating Our Future Programme](#);
- The United Kingdom's impending exit from the European Union (EU);
- Our accountability to the UK Parliament, National Assembly of Wales and the Northern Ireland Assembly and to the European Commission, in the way we exercise our duties so that regulation of feed is effective, proportionate, risk-based, and the requirements on businesses are clear; and
- The current climate of increased financial pressures on central and local government.

Our priorities and approach have been informed by the findings and recommendations of:

- A programme of LA [audits](#), in 2016, in England, which assessed the adequacy of official controls on feed of non-animal, including at primary producers;
- An internal [FSA review](#) in 2016, which assessed the effectiveness of the Feed Delivery Model in England; and
- The findings and recommendations of the United Kingdom Animal Feed Threat Assessment 2017.

Where do we want to be by 2021?

Our ambition is:

“To be an excellent, accountable, modern regulator”

Our mission is:

“[Food We Can Trust](#)” - safeguarding public and animal health by driving up sustained improvements in business compliance, through intelligence led enforcement”

What are the key elements of this strategy?

1. **To deliver effective, consistent, risk-based proportionate official feed controls, informed** by an accurate profile of feed business establishments and deliver sustained improvements in business compliance;
2. **To maximise the use of Intelligence** informing future priorities as well providing a national picture of official control activity;
3. **To strengthen the systems and processes of approval of third party assurance schemes** through collaboration with key stakeholders, robust governance and efficient internal processes; and
4. **To improve resilience and capability** within the Agency and LAs, to sustain a robust system of official controls that realises the FSAs strategic goal.

What are our objectives?

- **To drive a flexible and intelligence led approach to official controls**, focusing resources on higher risk and non-compliant business, placing an increased focus on outcomes;
- **To safeguard public and animal health** by setting modern regulatory standards for controls and ensuring their effective and consistent delivery;
- **To manage public money responsibly** to deliver our statutory responsibilities in the most cost effective and risk-based way;
- **To build resilience and capability** to sustain an effective programme of future official feed controls; and
- **To anticipate, plan for and deliver the consequences of exiting the EU**, protecting our export market and enabling the feed industry to continue to trade globally.

Our Guiding Principles

- **Effective engagement and communication** - Maximise and support effective working relationships with key stakeholders to the mutual benefit of all;
- **Deliver value for money** - Manage public money responsibly, to deliver an effective, risk-based programme of official feed controls, without compromising on quality or safety; and

- **Innovation** – Work in an agile way, dynamic and progressive in our approach to delivering outcomes.

Our Values

- Putting the consumer first;
- Openness and transparency;
- Science and evidence-based;
- Acting independently; and
- Enforcing feed and food law fairly.

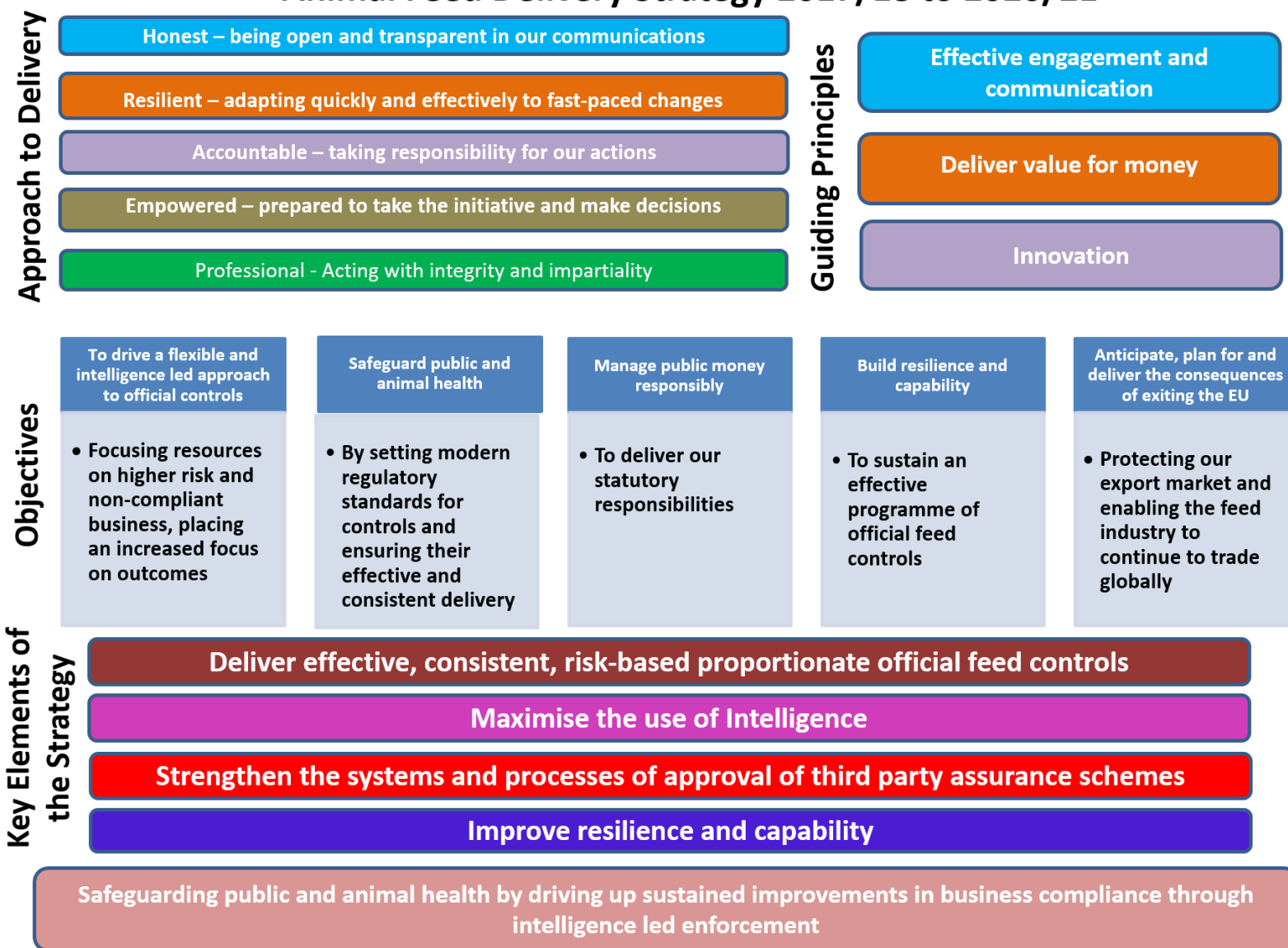
Our Approach to Delivery

- **Honest** - being open and transparent in our communications;
- **Resilient** - adapting quickly and effectively to fast-paced changes;
- **Accountable** - taking responsibility for our actions;
- **Professional** - Acting with integrity and impartiality to deliver the highest professional standards; and
- **Empowered** - prepared to take the initiative and make decisions that improve official feed control delivery.

What are our Value Propositions?

- a) To **ensure sustainable, effective and consistent delivery of official feed control activities** across England;
- b) To **influence the way that LAs deliver official controls** having regard to value for money (VFM) and Regulating our Future (ROF) principles; and
- c) To **provide expert advice and knowledge** where new policy decisions are necessary.

Animal Feed Delivery Strategy 2017/18 to 2020/21



How will we get there?

To deliver effective, consistent, risk-based proportionate official feed controls – which are informed by an accurate profile of feed business establishments and deliver sustained improvements in levels of business compliance and value for money				
Ref.	Action	Measure	Timescale	Progress
1	FSA to understand the barriers and issues faced by LAs in maintaining an accurate premises database and work with software houses to understand the capabilities and limitations of the software systems used by Local Authorities (LAs). FSA to subsequently review the need for specific additional guidance to LAs on data capture, use and reporting.	Consultation undertaken. Barriers/issues established and prioritised. Review undertaken and recommendations made. Action plan produced and delivered.	2018/19 2018/19 and 2019/20	Programme of work being developed.
2	FSA to work in partnership with ACTSO National Agricultural Panel (NAP) to develop national guidance, as appropriate and based on findings in Action 1, to support LAs to ensure that the accuracy of their feed premises databases and registers are up-to-date and maintained, all relevant feed premises are included in LA interventions programmes, there is consistent application of the Feed Law Code of Practice animal feed risk rating system supporting the National Trading Standards Desktop Model process, and that feed enforcement returns to the FSA are accurate.	Guidance developed as appropriate, and consulted on. Analysis of enforcement returns and changes in desktop model data.	2018/19 2019/20 2020/21 2019/20 2020/21	Programme of work being developed.
3	FSA to work in partnership with NTS to commission training to support LAs implementation of the national guidance on premises database accuracy, implementation of earned recognition (ER), consistent application of the Feed Law Code of Practice animal feed risk rating system and changes to the Code. 1-1 support to be provided by the FSA, as appropriate.	Training delivered and evaluated. 1-1 support provided.	2018/19 2018/19 2019/20	Work on-going to develop and deliver 6 days of training, funded through the Feed Delivery Programme Improvement project budget.

To deliver effective, consistent, risk-based proportionate official feed controls – which are informed by an accurate profile of feed business establishments and deliver sustained improvements in levels of business compliance and value for money

Ref.	Action	Measure	Timescale	Progress
4	<p>FSA in collaboration with NTS to develop and implement performance indicators and outcome measures to assess the effectiveness of implementation by NTS of the Feed Delivery Programme.</p> <p>FSA in collaboration with NTS to develop and implement performance indicators and outcome measures to assess the effectiveness of implementation of the Code by LAs.</p>	KPIs developed, consulted on and implemented	2018/19	On-going
5	FSA to work with the Office for Product Safety and Standards to further promote Primary Authority (PA) to the feed sector.	Increased take-up of PA by feed business operators.	2018/19	Programme of work being developed.

To deliver effective, consistent, risk-based proportionate official feed controls – which are informed by an accurate profile of feed business establishments and deliver sustained improvements in levels of business compliance and value for money

Ref.	Action	Measure	Timescale	Progress
6	<p>FSA to review the Feed Law Code of Practice and Practice Guidance with a view to addressing the recommendations of the LA Audit summary report and the FSA Animal Feed Review 2016 to deliver the FSA policy objectives of:</p> <ul style="list-style-type: none"> • driving a flexible and intelligence led approach to interventions, while maintaining an appropriate level of monitoring of compliance • maintain and enhance the level of public and animal protection by allowing LAs to target resources more effectively on higher risk and non-compliant feed businesses • promoting consistency in LA interpretation and implementation of official feed controls • promoting growth by reducing the burden on compliant businesses. <p>The review will include consideration of:</p> <ul style="list-style-type: none"> • simplification of the Code and associated Practice Guidance to ensure there is consistency in the interpretation and implementation of the Code among LAs in England and re-shaping the animal feed law risk rating scheme to focus LA official controls at higher risk and non-compliant feed business establishments. 	Code and Practice Guidance reviewed and implemented.	2017/18	Completed. Revised Code and Practice Guidance issued on 9 April 2018.
7	FSA to review its current guidance to support LAs to ensure that feed intervention and enforcement activities are consistent and subject to proportionate, routine qualitative and quantitative internal monitoring.	Guidance reviewed and new guidance developed, consulted on and published.	2018/19	Programme of work being developed.

To deliver effective, consistent, risk-based proportionate official feed controls – which are informed by an accurate profile of feed business establishments and deliver sustained improvements in levels of business compliance and value for money

Ref.	Action	Measure	Timescale	Progress
8	FSA to review the Feed and Food Hygiene Delivery Programme budget allocations to ensure risk-based, value for money official feed and food hygiene controls are delivered in line with this strategy, the Feed and Food Law Codes of Practice. To include a specific review of the roles and responsibilities of the Regional Feed Leads and the appropriateness of the flat fee funding arrangement.	Funding allocations and costs reviewed. Recommendations made, consulted on and implemented in 2019/20 and/or 2020/21, as per the findings of the review.	2018/19 2019/20	Initial meeting with the NTS Programme manager scheduled for 8 June 2018.

To maximise the use of Intelligence - to inform future priorities as well providing a national picture of official control activity

Ref.	Action	Measure	Timescale	Progress
9	FSA, in partnership with NAP, to review current practice, develop, formulate and implement an action plan to address the use of intelligence in the feed official control system considering the planned strategic threat assessment of the UK feed environment including any necessary training for officers, guidance on the identification, formulation and reporting of intelligence in the feed arena. Consideration to be given as to whether a joint approach to this work in respect of food standards could be taken.	Review of use of intelligence undertaken. Action plan developed. Action plan implemented.	2018/19 2018/19 2019/20	
10	FSA to review the data exchange between LAs and monitoring process in place at points of entry. Develop an action plan and implement, as appropriate.	Data exchange reviewed. Action plan developed. Action plan implemented.	2018/19 2018/19 2019/20	Programme of work being developed.
11	FSA to work collaboratively with NTS, Trading Standards South West and Trading Standards East Midlands, to develop and pilot the feasibility of collecting a suite of non-compliance indicators that will enable more accurate information on types of businesses and non-compliance, assured and non-assured to allow a more focussed assessment of potential threats to feed safety in future years. FSA to review the feasibility of collecting non-compliance data across the whole of England based on the pilot, costs/benefits and statistical significance, make recommendations, consult on and implement, as appropriate.	Pilot developed. Pilot implemented. Review of pilot and feasibility of all England roll out. Implement recommendations of feasibility study.	2017/18 2018/19 2019/20 2020/21	16 non-compliance categories agreed with pilot regions and mapped against Red Tractor Association and Agricultural Industries Confederation non-compliance reports.
12	FSA to ensure that the awareness of the National Enforcement Priorities (NEPs) and their importance in the delivery of national feed enforcement objectives are sufficiently raised with LAs, Lead Feed Officers, enforcement officers, senior managers and the feed industry.	Strategy and action plan developed. Strategy implemented.	2018/19 2019/20	Programme of work being developed.

To maximise the use of Intelligence - to inform future priorities as well providing a national picture of official control activity

Ref.	Action	Measure	Timescale	Progress
13	FSA to develop and publish the National Targeted Monitoring Strategy (NTMS) through the National Enforcement Priorities Sub Group (NEPSG). Develop annually to support delivery and implementation of the NEPs through the feed delivery programme improvement project funding.	Strategy developed, consulted on and published. Annual improvement projects developed and delivered.	2017/18 2018/19 2019/20 2020/21	Completed. NTMS for 2018/19 published on 9 April 2018.
14	FSA to develop the Bi-Annual UK Feed Threat Assessment. Producing a UK AFTA (2019) by 30 November 2018, from which the 2019/20 NEPs will be informed.	UK Feed Threat Assessment developed consulted on and published by 30 November 2018.	2018/19	On-going

To strengthen the systems and processes of approval of third party assurance schemes – through collaboration with key stakeholders, robust governance and efficient internal processes

Ref.	Action	Measure	Timescale	Progress
15	<p>FSA to carry out a fundamental review of the current process of approval and on-going governance of approved assurance schemes to confirm they provide reliable assurance, while also exploring the scope for reducing administrative arrangements to provide efficiencies for all parties without impacting negatively on governance and assurance arrangements, and having regard to the ROF work stream on assurance.</p> <p>The review will include exploring and building on recent improvements in communications between current Approved Assurance Schemes and LAs, exploring further opportunities to improve links between these parties. Produce a report of findings with recommendations, consult and implement, as appropriate.</p>	<p>Review undertaken. Report produced and consulted on.</p> <p>Action plan implemented.</p>	<p>2018/19</p> <p>2019/20 2020/21</p>	Programme of work being developed.
16	FSA to explore the opportunity for other assurance schemes operating in the feed sector to be recognised for ER, including the scope to broaden ER coverage with other government department/agencies.	<p>Explore opportunity, make recommendations and develop action plan.</p> <p>Implement action plan.</p>	<p>2018/19</p> <p>2019/20 2020/21</p>	Programme of work being developed.
17	FSA to review the implementation of ER by LAs to ensure that systems are effectively embedded and resilient at a local level with a view to developing national guidance, as appropriate around how ER can be accommodated on LA databases.	<p>Review implementation of ER.</p> <p>Develop and consult on guidance produced.</p> <p>Publish guidance.</p>	2018/19	Programme of work being developed.

To improve resilience and capability - to sustain a robust system of controls that realises our strategic goal of 'Food We Can Trust'				
Ref.	Action	Measure	Timescale	Progress
18	FSA to undertake a review of the current resilience and capability both within the Agency and LAs to sustain a robust system of official controls. Produce a report with a view to developing a resilience and sustainability strategy for official feed controls, consult and implement actions, as appropriate.	Review undertaken, report produced. Recommendations made and consulted on. Action plan implemented.	2018/19 2019/20 2019/20 2020/21	Programme of work being developed.
Anticipating, planning for and delivering the consequences of exiting the EU				
Ref.	Action	Measure	Timescale	Progress
19	FSA to work closely with EU exit colleagues in anticipating, planning, delivering and communicating to key stakeholders the consequences of exiting the EU.	Stakeholders kept informed of developments. Guidance developed, as appropriate.	2017/18 2018/19 2019/20 2020/21	On-going
20	Review of the Feed Law Code of Practice and Practice Guidance considering EU Exit, outcomes of the ROF programme and having regard to the responses from the 2017 Code and Practice Guidance consultation specifically to include, in consultation with NAP, a review of the: <ul style="list-style-type: none"> animal feed law risk rating system; NTMS approach to interventions at low risk farms; and FSA registration/approval activity codes. 	Code and PG reviewed, consulted on and amended in line with EU exit and ROF.	2018/19 2019/20 2020/21	On-going

Annex 1: Risk Log

Ref.	Risk Description	Mitigation	Officer Responsible
1	EU Exit delays or prevents delivery of key actions.	<p>Regular contact with FSA EU exit colleagues to foresee where possible any event that will impact on delivery against action plan timescales.</p> <p>FSA quarterly reviews of progress against actions, re-prioritising as appropriate.</p>	Julie Benson
2	Reduction in Feed Delivery Programme Funding.	<p>Having and delivering this strategy and associated action plan demonstrates how the FSA will ensure efficient and effective use of public money by safeguarding public and animal health by driving up sustained improvements in business compliance, through intelligence led enforcement.</p> <p>Reporting progress to the FSA Executive Management Team.</p>	Mark Davis
3	LAs reviewing their participation in the Feed Delivery Programme and/or disengaging because of funding pressures.	FSA in partnership with NTS and regions to explore alternative delivery models to ensure sustainable risk based official feed control.	Mark Davis