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UK REGULATOR EXPERIENCE USING 3RD PARTY ASSURANCE

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23 October 2018
Brisbane

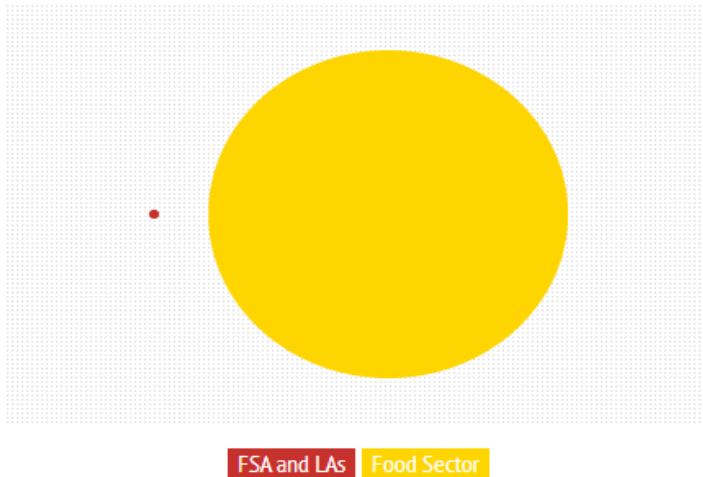
OUTLINE

Focus is on the practical application of the approach in the animal feed sector

- A reality check – prioritization of resources
- ‘Earned recognition’ in the feed sector
- Assessment and agreement
- Examples of the information/data we see and how we use it
- Impact

Reality check – prioritization of resource

Expenditure makes up 0.08% of Food Sector
Turnover



Sources: FSA annual accounts 2012-13, FSA estimates of LA Food Safety and Food Standards expenditure 2012-13, Annual Business Survey 2012

Staff make up 0.12% of people working in the
Food Sector



Sources: FSA annual accounts 2012-13, FSA estimates of LA Food Safety and Food Standards expenditure 2012-13, Annual Business Survey 2012

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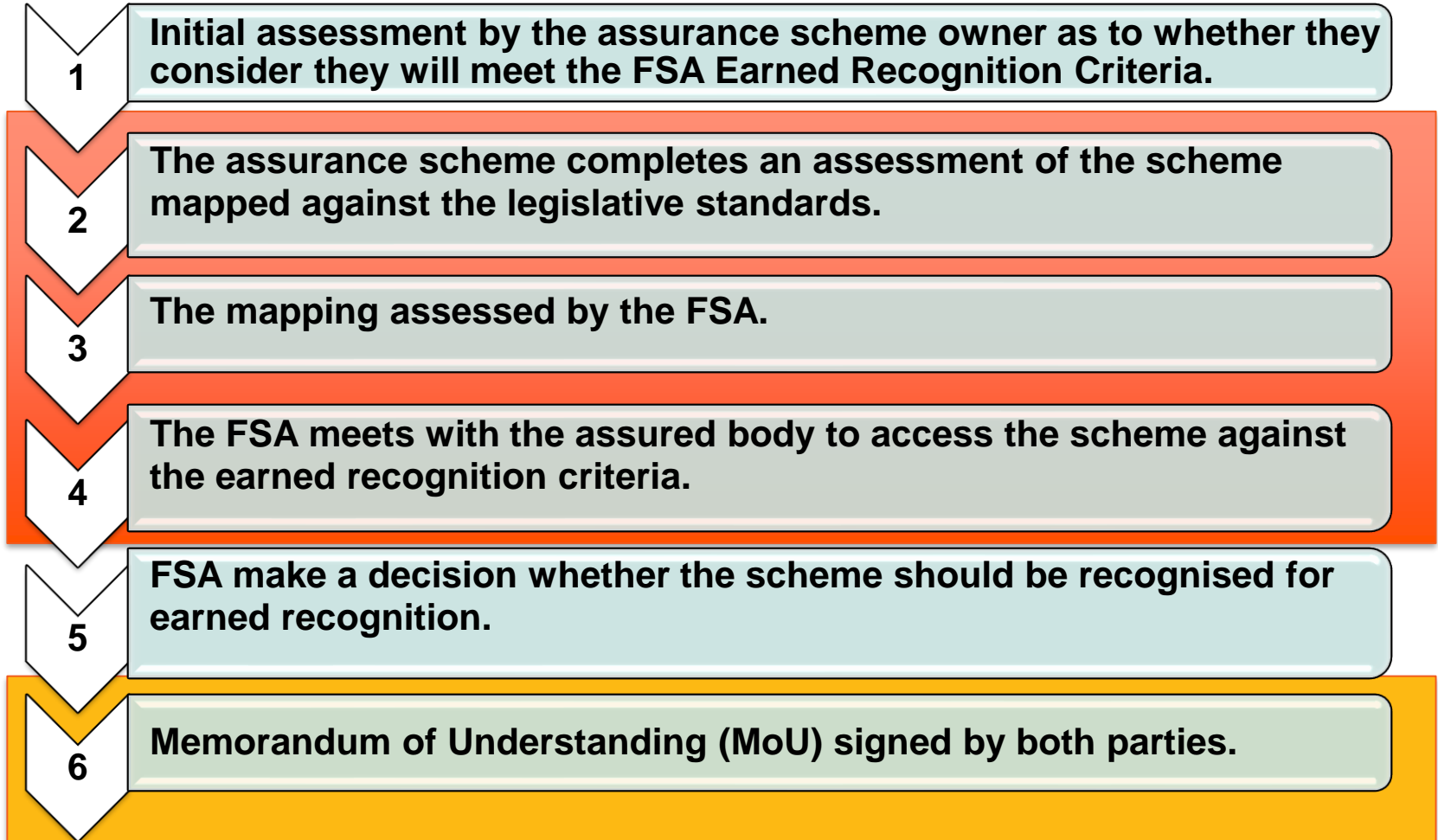
‘Earned Recognition’ in the feed sector

- A more risk-based approach to resource utilization in official control delivery.
- Intervention frequency informed by **history of compliance** and **third party assurance**
- Helps local competent authorities to prioritise higher risk feed businesses while still allowing them to act on local intelligence

- Type 1 - A business which is ***a member of an assurance scheme that the FSA has an MOU with*** and has been assessed by the local authority as demonstrating satisfactory or broad compliance

- Type 2 - A business which is ***not a member of an assurance scheme that the FSA has an MOU with*** but demonstrates a history of broad (highest level) compliance.

Earned Recognition Assessment Process



MOU - Data Protection

The industry scheme must ensure that:

- published Privacy Notice compliant with the 2018 General Data Protection Regulation
- information supplied is treated as confidential, is retained as confidential information and any restrictions placed upon it are observed
- the FSA and Competent Authorities are notified immediately a scheme assessor becomes aware of a serious threat to public health or animal health or any situation where animal welfare or the environment is compromised, or any fraudulent practices

Memorandum of Understanding for Earned Recognition Feed Hygiene and Medicated Feed

Between:

The Food Standards Agency
The Veterinary Medicines Directorate
Food Standards Scotland

and

The Agricultural Industries Confederation

November 2017



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Monitoring the compliance of assurance scheme members

Information from the Assurance Scheme owners:

- Information on when feed businesses leave or join an assurance scheme is provided by the assurance scheme owners via email
- Businesses no longer members of a scheme due to non-conformance are also specifically identified (and then prioritised for local authority inspection)
- Details of assurance scheme members can also be accessed on the internet, enabling status of membership to be checked by local authorities
- The FSA receive quarterly updates from the schemes which include summary information on the number and types of non-compliances raised during the assessment against the scheme standard. We share this information with local authorities.
- Immediate notification to the FSA of any serious threat to public health, animal health or where animal welfare or the environment is compromised.

Monitoring the compliance of assurance scheme members- Information from the Assurance Scheme owners: RTA completed assessments

Beef Feed Hygiene Standards					
No. Assessments:	3987	3986	4125	3827	3679
	Oct - Dec '16	Jan - Mar '17	Apr - Jun '17	Jul - Sept '17	Oct - Dec '17
VC.b- responsible use of bait	5.2% (208)	6.4% (257)	5.3% (217)	5.5% (212)	18.1% (667)
KEY VC.a- systems to control vermin	0.8% (31)	1.1% (42)	0.7% (27)	1.2% (45)	1.7% (63)
KEY FW.l- feed storage	1.1% (42)	2.0% (79)	1.9% (77)	1.6% (61)	1.4% (52)
FW.f- records of all feedstuffs	0.6% (24)	0.6% (23)	0.6% (26)	0.9% (33)	0.8% (31)
FW.g- feed mixing records	0.5% (19)	0.7% (29)	0.5% (20)	0.4% (14)	0.5% (18)
KEY FW.d- Feed must be suitable	0.3% (12)	0.6% (23)	0.4% (16)	0.5% (21)	0.2% (8)
FW.i- pre-mixture/ additives/ medicated feeds, authority approval	1.4% (54)	1.2% (49)	0.8% (32)	0.7% (26)	0.2% (7)
KEY FW.c- adequate access to drinking water	0.3% (12)	0.6% (25)	0.8% (31)	0.3% (11)	0.1% (4)
FW.h- samples of mix formulation	0.1% (5)	0.2% (8)	0.2% (7)	0.1% (3)	0.1% (4)
FW.k- feed contamination from machinery	0.2% (6)	0.2% (9)	0.1% (4)	0.2% (6)	0.1% (4)
KEY FW.a- sufficient feed provided	0.2% (8)	0.3% (12)	0.4% (15)	0.2% (9)	0.1% (3)
SC.b- competence of staff reviewed	0.2% (6)	0.2% (8)	0.1% (3)	0.1% (5)	0.1% (2)

Monitoring the compliance of assurance scheme members - Information from Assurance Scheme owners: AIC (TASCC)

Date from: 01/05/2018 Date to: 31/07/2018

Unique Members	Number
England	1222
Wales	85
Scotland	251
Northern Ireland	86
Total	1644

Activity	Planned	Carried Out	Overdue	Comments (Please provide reasons for overdue audits/witness assessments)
Audits		420	6530% overdue. We completed 35.68% more than planned	The number of audits completed is higher due to GTAS participants moving over to TASCC. Since 1st January 2018 we have issued 268 new certificates. The number of applications is approx 60-70 per month at present. This will slow as only 139 hauliers left on the GTAS website. We have completed 1 unannounced in the last 3 months, this number is low as we have been going through getting initial audits booked as well as harvest audits due to harvest starting earlier this year. In 2018 so far we have completed 11 with another 4 planned in August. We need to complete a further 7 to complete 5% of stores. We have completed 2 mill visits to see hauliers whilst working, one in Liverpool and one in the Republic of Ireland. 4 other sites are planned for 2018
Witness Audits			7	
Short notice Audits			1	

Witness Assessments - Please provide details of the outcomes of witness assessments

There were no issues with the witness assessments completed. We have also trained a further 7 potential TASCC assessors who are currently out shadowing approved assessors

Auditor Monitoring - Please provide details of the results of verification arrangements for monitoring auditors

Monitoring of assessors is completed through the witness assessment programme but is also monitored on a daily basis due to all TASCC reports being graded for the action points raised, the detail within the report, the scope is correct and the presentation of the report.

Training - Please provide an update on training of auditors, including any training initiatives underway or planned

Assessor Training took place on the 11th June 2018 in Harrogate. Topics covered included new TASCC Code of Practice for 2018, Proficiency Ring Testing schemes delivered by Scianteq, GDPR, Information on the new electronic checklist (E-Cert) plus assessor grading's were issued to all assessors. The AIC and TASCC Working Group representation were also present.

Withdrawals	Total
Number	13
Reasons	No longer using site. No longer hauling feed. Sold trailers. Gone into Liquidation and retired,

Suspensions	Total
Number	12
Reasons	There was a critical raised at an existing TASCC site due to pest control. This site remained suspended for 2 weeks whilst the issues were settled and also a re-visit took place. No response to Majors within timescale of 15 days. No corrective action evidence within the 30 day timescale and close out within 60 days. Request from new participants after 3 months for traceability records not received. Pest control problem Critical raised at audit.

Monitoring the compliance of assurance scheme members - Information from Assurance Scheme owners: AIC (TASCC)

Top major non-conformances (most frequent by sector)			
Number Raised	Number of businesses	Number of businesses responding within 15 days	Number outside 15 days but working towards completion
60	46	34	12 (10 Initials)

Standard Reference	Times raised (No. & %)	Sector/ business type (s)	Standard detail
G18.1Ma	13 = 21.66%	All	HACCP carried out (All raised at initial audits)
G10.1aMa	12 = 20%	All	Evidence of registration with Food Hygiene regulations (9 raised at initial audits 3 at routine but had started carrying milling wheat)
G18.1aMa	8 = 13.33%	All	Establish HACCP team (All raised at initial audits)
G10.1bMa	6 = 10%	All	Evidence of registration with Feed Hygiene regulations (All raised at initial audits)
G9.1aMa	3 = 5%	All	Defra CoP for Control of Salmonella available

Top minor non-conformances (most frequent by sector)			
Number Raised	Number of businesses	Number of businesses responding within 30 days	Number outside 60 days but working towards completion
1004	394	308 within 30 days. 64 within 60 days	22

Standard Reference	Times raised (No. & %)	Sector/ business type (s)	Standard detail
G19.2kMi	198 = 19.72%	All	Designated person must complete relevant i-learning modules or equivalent
G21.1Mi	100 = 9.96%	All	Participant must carry out an internal audit
G3.1Mi	79 = 7.86%	All	Documented Management Review
G19.1aMi	56 = 5.57%	All	Personnel must have appropriate training, experience or qualifications
G18.2Mi	53 = 5.27%	All	HACCP reviewed
G2.2aMi	50 = 4.98%	All	Dated Policy Statement

Reporting serious non-compliance by an assurance scheme member – Exception Reporting

This report provides for a dialogue between the local authority feed officer and the assurance scheme in question via the FSA

Please note: This form should only be completed on removal of Earned Recognition	
Name of Local Authority	
Name of Reporting Officer	
Contact telephone number/email	
Date of Local Authority inspection	14/05/18 + subsequent visits
Local Authority reference number	
Date report submitted to the FSA	03/08/2018
Name and address of the business inspected	
Assurance scheme to which the business is affiliated	RT Beef and Lamb
Summary of the contraventions found (including legislative reference as appropriate) and what action the LA has taken or intends to take against the business	
<p><i>Note: This box expands as you type</i> 1. Animal by-products (carcasses) left in silage pit. Transporting the silage from the pit to the livestock requires the vehicle going through the carcasses causing cross contamination. There was also leakage from the carcasses which followed towards silage. (EC Regulation 183/2005 (Annex I, 2 Feed business operators shall ensure, as far as possible, that primary products produced, prepared, cleaned, packed, stored and transported under their responsibility are protected against contamination and spoilage))</p> <p>(EC Regulation 183/2005 (Annex I, 4 (b) Where appropriate, feed business operators shall take adequate measures, in particular: to ensure, where necessary, hygiene production, transport and storage conditions for the cleanliness of, feed))</p> <p>(EC Regulation 183/2005 (Annex I, 4 (e) Where appropriate, feed business operators shall take adequate measures, in particular: to store and handle wastes and hazardous substances, separately and securely, so as to prevent hazardous contamination))</p> <p>(EC Regulation 183/2005 (Annex III, 'Feeding' 2. 'Distribution': During distribution and feeding, feed shall be handled in such a way as to ensure that contamination does not occur from contaminated storage areas and equipment)</p> <p>(EC Regulation 183/2005 (Annex III, 'Feed and Water': Feeding and watering equipment must be designed, constructed and placed in such a way that contamination of feed and water is minimised. Watering systems shall be cleaned and maintained regularly, where possible.</p>	
Assurance Scheme update	Date:
Date of last assessment prior to the exception report: Routine inspection on 7 th Feb 2018. Spot check on 29 th March. Full inspection 15 th June	
<i>Note: This box expands as you type (Please include dates of the most recent inspection)</i>	
Due to the large number of NCS raised at the routine inspection in Feb, the farm was put under increased surveillance. The inspection in June did not raise any issues and the assessor reported that the farm had much improved	
Assurance Scheme update	Date: 13/8/18
<p><i>Note: This box expands as you type</i> Following notification of FSA exception report the farm had an unannounced spot check on 10th August. Some minor non-conformances were identified which will be closed out within 28 days or the farm will be suspended from the scheme. The farm will remain on increased inspections</p>	
Local Authority response (if required)	Name of Reporting Officer (if different):
Contact telephone number/email:	Date: 17/09/18
<p><i>Note: This box expands as you type</i> Many thanks for the update regarding the action taken by the farm assurance scheme. I noted that an unannounced spot check was carried out on 10 August where only minor non-conformances were found. At this time, the bonfire pictured at point 2. of the exception report used to burn animal carcasses was still present. Was this considered by the auditor as part of the audit? We have been working to get the waste removed. This has not been straight forward as the bonfire contains many different materials and the agreed disposal sites will not take the waste. We are currently seeking further guidance from the APHA.</p>	



..... Impact of Earned Recognition

- The Introduction of Earned Recognition has enabled businesses with membership of a recognised industry assurance scheme or non-assured businesses with a history of broad compliance to receive less frequent official inspections
- The changes to the 2014 Code led to 9,400 feed businesses no longer due an inspection in 2016/17 by virtue of earned recognition
- Changes to the 2018 Code has led to a further 8,373 less inspections due in 2018/19, equating to a 83% reduction in total interventions since 2014

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THANK YOU
ANY QUESTIONS?
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PPPs to improve food safety capacity: STDF experiences on the ground



CCFICS, Brisbane

23 October 2018

standardsfacility.org

Public Private Partnerships



How can the public and private sector collaborate to build SPS capacity?

STDF Note: Partnering with the private sector

STDF/IDB publication (2012)

Meeting pesticide standards in Africa, Latin America and Asia



160+ scientists/officials trained to generate, review and interpret pesticide residue data

New MRLs for minor-use crops

Foundation set up to build on projects' results worldwide

WTO Ministerial statement – projects catalysed public-private collaboration



Regulatory approaches to voluntary 3rd party assurance programmes

Opportunity to support risk-based approaches,
target resources, reduce regulatory burden,
improve compliance

Concerns about accountability, transparency,
increased compliance costs, dual systems

CCFICS draft principles and guidelines

New STDF Grant Applications

Design regional projects to pilot 3rd party assurance programmes in Central America and Africa

Linked to CCFICS work

Focus on selected supply chains

Assess the feasibility, practicability and challenges involved

Understand outcomes for government and private sector

