



Cyngor Castell-nedd Port Talbot  
Neath Port Talbot Council

Trading Standards, Food Hygiene  
& Health Protection

# **FOOD & FEED LAW ENFORCEMENT** **SERVICE DELIVERY PLAN**

**2025-2026**

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## Neath Port Talbot County Borough Council Office Hours:

8.30am to 5.00pm Monday to Thursday and 8.30am to 4.30pm Friday.

### Access Outside of Normal Office Hours

Emergency food & feed safety issues are currently directed to a 24-hour emergency call out service and the officer on-call has access to contact details for senior food / feed officers.

Officers are expected to carry out enforcement work outside of normal office hours, including evening and weekends, to match the 24-hour economy.

### Contact Details:

Service	Trading Standards & Animal Health	Food & Health Protection
Correspondence	The Quays, Brunel Way, Baglan, SA11 2GG	
Telephone (Complaints)	Via 'CACS' (Citizens Advice Consumer Service) 0808 223 1144 (Welsh) 0808 223 1133 (English)	01639 686868
Telephone (Enforcement)	01639 686868 01639 666877	01639 686868
Website	<a href="https://www.npt.gov.uk/tradingstandards">https://www.npt.gov.uk/tradingstandards</a>	<a href="https://beta.npt.gov.uk/environmental-health/food-hygiene-and-food-businesses/">https://beta.npt.gov.uk/environmental-health/food-hygiene-and-food-businesses/</a>
Email	<a href="mailto:tsd@npt.gov.uk">tsd@npt.gov.uk</a>	<a href="mailto:food@npt.gov.uk">food@npt.gov.uk</a>
Facebook	NPTTradingStandards	NptEnvHealth/TradingStandards
Twitter	@NPTTradingStds	@NPTEHTS
Instagram	@NPTTradingstds	

## **1.0 SERVICE AIMS AND OBJECTIVES**

### **1.1 Purpose of the Service**

Neath Port Talbot County Borough Council strives to ensure food safety and to maintain standards from the primary producer / farm through to the manufacturer onto the retailer or caterer, until it reaches to the ultimate consumer. This is known as the 'farm to fork' principle.

Local authorities are required to provide a service plan which details the delivery of their food and feed enforcement responsibilities for the year ahead. In addition, the food/feed authority also undertakes a review of the implementation of the previous year's plan.

The plan seeks to ensure that food and feed national priorities are delivered locally and that local priorities are also addressed, with a balanced approach to enforcement. This is achieved by managing resources between a proactive intervention programme and ensuring that adequate provision is made to respond to reactive work, such as complaints, food poisoning incidents, product recalls, requests for advice from businesses and intelligence led projects.

Funding for feed enforcement comes directly from the Food Standards Agency and is administered across Wales by Trading Standards Wales (TSW). Neath Port Talbot (NPT) administers the funding for the Neath Port Talbot / City & County of Swansea region.

### **1.2 Aims and Objectives**

The aims and objectives of the food and feed law enforcement service are:

- To help to maintain a safe and healthy environment in the County Borough.
- To encourage good practices in food safety, food standards, feed standards & hygiene and fair-trading.
- To take action in line with the Neath Port Talbot Trading Standards, Food & Health Protection / Environmental Health enforcement policy to discourage practices which are unfair to other traders or threaten health.
- To ensure that resources are targeted where they are most effective and address areas of highest public health risk within the food chain.

### **1.3 Link to Corporate Objectives and Plans**

In delivering the food and feed law enforcement service, both the Food and Health Protection (FHP) service and the Trading Standards & Animal Health (TSAH) service continue to promote the aims and objectives of the Authority and maintain the reputation of the Council. In particular, the service will be delivered in a manner that is sensitive to service users' expectations. The emphasis will be on protecting and improving health and promoting the economy of the County Borough. There are Local and National Performance Indicators for these services (see Paragraph 3.1.4 below). These are monitored on a quarterly basis via the senior managers and Cabinet Member.

## 2.0 BACKGROUND

### 2.1 Profile of Neath Port Talbot

Neath Port Talbot County Borough Council is a Unitary Authority in South Wales and a recognised statutory Food & Feed Authority. The towns of Neath, Port Talbot and Pontardawe are the largest settlements in the Borough, with a number of other villages and settlements dispersed throughout the remaining rural valley areas. The County Borough serves a population of approximately 142,300 (Census, 2021) and covers an area of 44,217 hectares. It is the seventh largest authority in terms of population in Wales. See section 2.4 for details on premises profile.

### 2.2 Organisational Structure

The charts attached as appendices A, B and C illustrate the organisational structures of the services. The diagram below demonstrates the position of the services within the Authority.

Chief Executive	
Environment & Regeneration (Director)	
Planning & Public Protection (Head of Service)	
Trading Standards, Food & Health Protection (Manager)	
Food Standards, Feed Hygiene & Standards  (Trading Standards & Animal Health Team Leader)	Food Hygiene  (Food Hygiene & Health Protection Team Leader)

The following external bodies support the services:

Laboratories	Complaint Referrals	Partnership & Support
Public Health Wales (formerly the Public Health Laboratory Service, PHLS) at West Wales General Hospital, Carmarthen – for food examination (Microbiological).	Citizens Advice Consumer Service	Food Standards Agency
Public Analyst, Minton, Treharne & Davies Limited - for food and feed analysis (non-microbiological).	Food Standards Agency	City & County of Swansea (feed delivery within the NPT / Swansea region)
Public Analyst Scientific Services Limited – for food & feed analysis (non-microbiological).	Other Local Authorities	Trading Standards Wales & The Glamorgan Group – for coordinated sampling programmes and guidance
		Contractors as service demand requires and resources allow

## 2.3 Scope of the Food & Feed Law Enforcement Service

The Food Hygiene service is delivered by officers of the Food & Health Protection Team. Food Standards and Feed functions are delivered by officers of the Trading Standards & Animal Health service.

When necessary, suitably competent and qualified food hygiene (FH), food standards (FS) and feed contractors (Locums) are used to cover long term sickness/maternity leave/vacant posts or project work funded by external sources. This is in accordance with service need, resources available and with authorisation by the Head of Planning and Public Protection.

Other Trading Standards & Animal Health Service Functions	Other Food Hygiene & Health Protection Service Functions	Delivered via
Fair Trading	Investigation and control of communicable diseases	Disease notification & investigation
Product Safety	Health Promotion	Inspection programmes
Consumer Fraud		Test purchasing programmes
Counterfeiting / Trademarks Enforcement		Provision of advice to businesses
Weights & Measures / Metrology		Sampling programmes
Underage Sales		Criminal investigations
Animal Welfare		Internet / social media monitoring
Petroleum Enforcement		Responding to national food / feed alerts and recalls
Tobacco control		Inspection of weighing & measuring equipment
Animal By Products		Surveys & projects
Safeguarding/ Consumer Education		

## 2.4 Demands on the Food & Feed Services

Total number of Food & Feed Premises in Neath Port Talbot	
Food Premises	Feed Premises
<p><b>1,346</b> known food businesses operating within NPT, of which:</p> <p><b>1,322</b> are Registered with NPT.</p> <p><b>24</b> are based outside of NPT, and Registered by their relevant LA, but frequently trade within NPT and are subject to official control</p>	<p><b>291</b> known feed businesses.</p> <p>Previously these were recorded by premises type, however in line with FSA reporting these have now been recorded below by registration and approval.</p>

interventions (usually co-ordinated with their local LA).

Once registered with a local authority a food business can trade in any area.

These are mainly farms using feed for raising livestock.

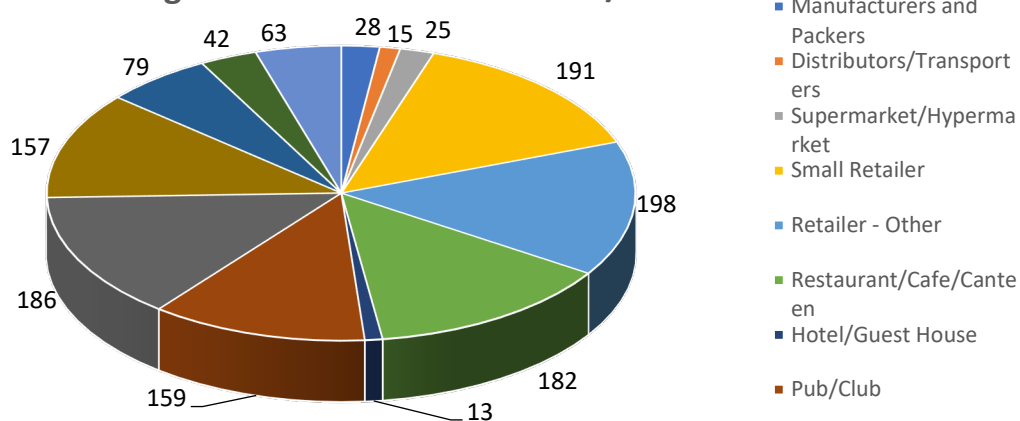
The authority has **3** specialised feed and **1** pet feed manufacturer, included in the number above.

There are also a significant number of supermarkets and food producers who will sell food waste for animal feed and are caught by the feed regulations.

#### BREAKDOWN OF REGISTERED FOOD PREMISES BY FSA CATEGORY

CODE	REGISTERED FOOD PREMISES	Number of Premises		
		2023/24	2024/25	2025/26
F01	Primary Producer	0	0	0
F02	Manufacturer / Packer	28	32	28
F03	Importers / Exporters (EU)	0	0	0
F04	Distributor / Transporter	10	10	15
F05	Supermarket / Hypermarket	25	24	25
F06	Small Retailer	192	196	180
F07	Retailer / Other	154	176	191
F08	Restaurant / Café / Canteen	185	175	184
F09	Hotel / Guest House	14	13	14
F10	Pub / Club	162	158	158
F11	Takeaway	169	176	184
F12	Caring Premises	170	160	159
F13	School / College	75	79	79
F14	Mobile Food Unit	44	43	42
F15	Restaurants & Caterers – Other	70	66	63
F16	Importers / Exporters (3 <sup>rd</sup> Countries)	1	0	0
<b>Total</b>		<b>1,299</b>	<b>1,308</b>	<b>1,322</b>

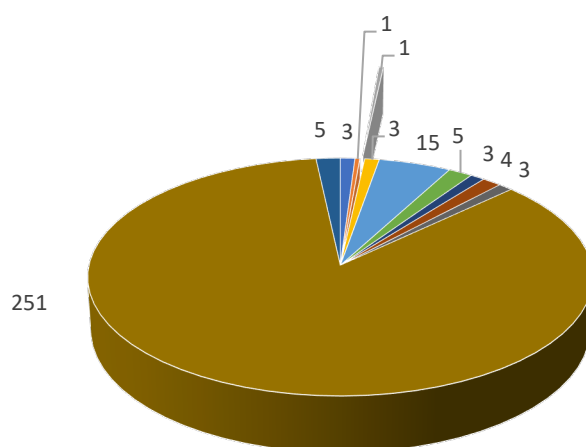
### Registered Food Premises 2025/26



BREAKDOWN OF ANIMAL FEED PREMISES, BY APPROVAL / REGISTRATION CATEGORY				
Code	Animal Feed Premises	Number of Premises		
		2023/24	2024/25	2025/26
Approval				
A1	Manufacturer of feed Placing on the market of nutritional additives	3	3	3
A2	Manufacture and/or placing on the market of zootechnical additives, this includes - digestibility enhancers, gut flora stabilisers and substances which favourably affect the environment	0	0	0
A3	Manufacture and/or placing on the market of antioxidant additives with a maximum content in feeds specified in Regulation 1831/2003	0	0	0
Registration				
R01	Manufacturing and/or placing on the market of feed additives (excluding those subject to approval)	0	0	0
R02	Manufacturing and/or placing on the market of premixtures (excluding those subject to approval)	1	1	1
R03	Manufacturing and/or placing on the market of bioproteins (certain products not subject to approval)	0	0	0
R04	Manufacturing of compound feeding stuffs	0	0	0
R05	Placing on the market of compound feeds	1	1	1
R06	Manufacturing of pet foods	2	2	3
R07	Manufacturing and/or placing on the market of feed materials.	13	13	15
R08	Transport of feed and feed products	0	0	0

<b>R09</b>	<b>Transport of feed and feed products</b>	7	2	5
<b>R10</b>	<b>On-farm mixing with additives and premixtures.</b>	3	2	2
<b>R11</b>	<b>On-farm mixing with compound feeds and additives</b>	4	4	4
<b>R12</b>	<b>Food businesses selling co-products of the food industry which are destined as feed materials.</b>	4	3	3
<b>R13</b>	<b>Livestock farms, including fish farms (excluding those mixing feeds).</b>	252	263	251
<b>R14</b>	<b>Arable farms growing or selling crops for feed</b>	5	5	4
<b>Total:</b>		<b>295</b>	<b>299</b>	<b>294</b>

### Feed Premises Premises Analysis 2025/26



- BA1 A1 Manufacturing additives
- C05 R3 Manufacture Bioproteins
- C07 R7 Manufact'Feed materials
- C10 R10 Mixing feeds on farms
- C12 R12 Food businesses selling co
- C14 R14 Arable Farms growing or selling crops for feed
- C02 R2 Manufacture premixtures
- C06 R6 Manufacture of pet foods
- C09 R9 Storage of feed
- C11 R11 Mixing feeds on farms with compound feeds
- C13 R13 Livestock farms . No mixing of feed

More information on the registration and approval system for animal feed can be found [here](#).

The County Borough has 3 specialist feed manufacturers requiring inspection by officers with specific qualifications and competencies.

Lower risk food and feed businesses will not necessarily be subject to a full programmed inspection but may be dealt with via a focused survey or as part of the food sampling programme.

The authority's food and feed enforcement activity recently transferred from the Authority Flare/APP system to the recently implemented IDOX Public Protection system. The data held on the APP system has been used to complete the food twice-annual return (currently under review) and the feed annual return for the FSA. In future Idox will be used for these purposes.

There are two stages to completing the feed return. The initial "desktop modelling" return at the beginning of the year identifies the feed business profile across the region. This modelling return is then used to calculate the region (Swansea/NPT) commitment (number of interventions at specific types of premises). At the end of the year a return based on achievement of that commitment is submitted.

## **2.5 Strengths, Weaknesses, Opportunities and Threats**

- The Food & Health Protection Service and the Retail & Industrial section of the Trading Standards Service share an enforcement database, exchange information on food matters, carry out joint exercises to increase awareness of the role of each service and explore opportunities for joint operations to promote stronger working relationships.
- Both the Trading Standards & Animal Health and Food Hygiene services follow an Agile/Hybrid working model. Based at The Quays, Baglan, the services now work flexibly on site, from home and from council buildings across the authority. The Hybrid working system is under continual review, and further enhancements or changes to the ways of working could prove necessary. The focus continues to be on delivering the service and outputs, being in the right place at the right time to do the right job and improve efficiency. There is an increasing dependency on ICT to communicate and record work.
- The services will continue to seek joint training opportunities where there is crossover or commonality (such as food law, legal processes etc.) and share resources (evidence store, equipment etc.).
- In addition to the normal workload remits, further demands (with anticipated impacts) will be made on the services in 2025/26, which are referenced below.

### **Trading Standards: Food Standards and Feed**

- Prior to the pandemic the service had a large backlog which Covid 19 only exacerbated. The FSA Recovery Plan period has now officially ended, but there remains a large backlog of unrated and Risk Category B and C premises overdue for an intervention.
- Staff changes have led to the engagement of external contractors and the development of new staff to bring them up to competency, plus the absence on long term sickness of a food officer has led to pressures on the service, it is not anticipated that this will be alleviated in 2025/26.
- The FSA's interim 6 monthly monitoring system remains in place, but it is anticipated this will be replaced by a new system in 2026/27. Work to implement this will need to be carried out this year, however the new database appears to be configured in readiness for the transition.

- It is important to highlight that Trading Standards (TS) deal with a very wide range of legislation and a broad base of subjects. Food & Feed qualified officers are required to be experts in other areas of TS law, and their time needs to be divided between all the Trading Standards functions.
- The service has increased its use of targeted enforcement using national, regional, and local trend analysis and consequently it continues to identify significant breaches specifically in allergen declaration and description / substitution.
- The implementation of the revised food Code of Practice (COP) is due in 2025/26; this will include the new food standards risk assessment scheme that NPT piloted. IT systems and procedures will need to be tailored to meet the needs of the revised COP.
- The TS Team leader is a member of a panel drawn from England, Wales and Northern Ireland consulting on the development of new key performance indicators to replace the Local Authority Enforcement Monitoring System (LAEMS) – otherwise known as the FSA return.
- The continued use of the Trading Standards intelligence protocol.
- Seeking new business partners to broaden the implementation of the Primary Authority and “Buy with Confidence” schemes within NPT.
- Identifying food businesses supplying “co-products” (i.e. former foodstuffs reprocessed as animal feed) and advising them of their obligations and responsibilities.
- Tackling the areas identified as local and national priorities for food & feed standards, such as food allergens, food supplements (particularly sold over the internet) and the adulteration and substitution of food, food containing CBD (cannabidiol) products, and the growth in the ‘raw’ pet-food trade.
- The management of the regional feed enforcement delivery model with Swansea Trading Standards, as per the agreement with the Food Standards Agency.
- Ongoing staffing issues will persist into the next financial year.

## **Food Hygiene & Health Protection**

- The post-Covid 19 pandemic recovery phase has concluded, and pro-active inspection aims have reverted to align with the Food Law Code of Practice.
- The continuing long-term impact on food safety of the Pennington Report following the public inquiry into the (fatal) South Wales E. coli outbreak and recommendations for enforcement.
- Sustaining collaboration on the operation of the mandatory Food Hygiene Rating Scheme and Food Hygiene Rating (Wales) Regulations 2013 and to provide open feedback on the compliance levels achieved by individual businesses.

- Continued promotion of the requirement for relevant Businesses to be operating to a documented Food Safety Management System, which is commensurate with their activities.
- Commitment to promote the Food Hygiene Rating Scheme
- To undertake a mix of enforcement interventions across a range of food businesses.

## **Common Areas – Trading Standards and Food Hygiene Services**

- To continue to monitor for the presence of illicit and/or counterfeit foodstuffs that have been detected in other authorities, utilising and analysing intelligence received from the Regional Intelligence Analyst, National Food Crime Unit, local intelligence sources and partners.
- Further development of sharing of information between food hygiene and food standards and cross boundary and regional work in the fields of food and feed, to build resilience, consistency and robustness within service delivery.
- The implications of the UK's exit from the European Union and the impact on enforcement and the economy, including evolving trading protocols.
- Continue to meet the demands of newly established or novel feed & food businesses within the county borough.
- Migration to and implementation of the new Management Information System for the service replacing the APP/Flare system and the challenges presented by the level of dedicated support in administering that system. Team Leaders and senior officers have been allocated responsibility for configuration.
- Working with the 'NPT Buy Local Scheme' and other Local Authority initiatives, the 'Buy with Confidence Scheme', and national schemes such as Primary Authority to ensure a consistent and uniform approach to facilitate parity for the local economy and business.
- Following the change in working arrangements over the past 4 years, a review of existing policies and procedures is ongoing to ensure that they are fit for purpose.
- Accommodating service delivery in line with the identified priorities relevant to the service, in addition to NPT's Forward Financial Plan (FFP).
- Fostering stronger partnerships with bodies that have an interest in breaches of legislation relating to food, including the Food Standards Agency (FSA), His Majesty's Revenue & Customs (HMRC) and the Animal & Plant Health Agency (APHA).
- Maintaining and assessing competencies in line with the Food Law Code of Practice (Wales).
- Continuing to develop the staff succession plan for the services and encourage the professional development of less experienced staff.

- The effect that the now regular annual outbreak of animal disease, such as avian flu and bluetongue, will have on service delivery and local businesses.

## **2.6 Regulation Policy**

The department has a Member approved 'Enforcement Policy' incorporating the concepts of the Enforcement Concordat; Regulatory Enforcement and Sanctions Act 2008; Primary Authority Scheme; the Food Law Code of Practice (Wales) and Feed Law Code of Practice (Wales).

The enforcement policy can be found on the Council website.

Officers of the service will seek to ensure food & feed business operators comply with relevant legislation by means of:

- Providing information and advice, education & training (there is a charge for bespoke business advice).
- Raising awareness of the law and good practice associated with the legislation.
- Taking enforcement action where necessary and in line with the Enforcement Policy.

## **3.0 SERVICE DELIVERY**

### **3.1 Interventions at Food and Feeding Stuff Establishments**

#### **3.1.1 Intervention Policy**

The authority will continue to implement a planned programme food hygiene, food standards and feed inspections at premises within the County Borough.

The Food Law Code of Practice (Wales) has introduced a range of interventions to allow officers to use their professional judgment to apply a proportionate level of regulatory and enforcement activities to each food business. Interventions are split into 2 categories.

1. Official controls include: inspections; monitoring; surveillance; verification; audit; and sampling (where the analysis is to be carried out by an official laboratory).
2. Other interventions which do not constitute official controls include: education, advice & coaching provided at a food establishment, information & intelligence gathering.

Interventions are applied in a risk-based manner so that more intensive regulation is directed at those food businesses that present the greatest risk to public health or are most likely to impact the food chain.

Feed inspections are governed by the Feed Law Code of Practice and the programme devised by Food Standards Agency Wales.

### **Food Hygiene**

The intervention programme is based on the intervention rating scheme contained in Annex 5 of the Food Law Code of Practice, which means that, dependent on risk, premises should be subject to a suitable intervention within a range of 6 months to 3 years.

Food Hygiene Interventions will be undertaken in accordance with the guiding themes contained within the Food Hygiene Interventions Procedure, the relevant legislation, Food Law Code of Practice, Food Law Practice Guidance and various Industry Guides. Officers will carry out food hygiene interventions to ensure that food meets the requirements of food hygiene and safety law, including microbiological quality, absence of pathogenic micro-organisms, and safety for consumption. Assessment under the Food Hygiene (Rating) (Wales) Act 2013 will be undertaken during full inspections.

Interventions in unrated establishments will be prioritised in accordance with Practice guidance.

During interventions, qualified officers will place particular emphasis on assessing and advising food businesses on the requirement for a documented food safety management system and food hygiene training.

Following a “Systems Review”, the section has redesigned its approach into proactive and reactive teams. Resources can flow between the two teams as required. The proactive team concentrates on the inspection of premises, and the Reactive team focuses on dealing with food hygiene complaints and concerns reported to the Service, primarily from members of the public.

Table 2(a): Planned Food Hygiene Interventions due 2025/26 (as at 1<sup>st</sup> April 2025)

***Please note that following the COVID 19 pandemic, the FSA/LA Recovery Plan (agreed between Food Standards Agency and Local Authorities in Wales) prioritised Higher Risk premises, and those which were “not broadly compliant”, then progressed to include all outstanding premises (together with all new businesses, and various reactive work).***

***The table below illustrates what is due under the overall Food Law Code of Practice.***

RISK CATEGORY FOR FOOD HYGIENE	NUMBER OF PREMISES		NUMBER OF INTERVENTIONS		ESTIMATE – FOR WORK PLANNING- NUMBER DUE / PLANNED 2026/27 (YEAR AHEAD).
	IN CATEGORY (2025/26)	CARRIED FORWARD	ADDITIONAL DUE / PLANNED 2025/26	TOTAL DUE 2025/26, INC BACKLOG	
<b>HIGH RISK</b>					
<b>A</b> (2 interventions per year)	(3)	0	6	6	e.6
<b>B</b> (1 intervention per year)	(51)	1	50	51	e.51
<b>C</b> (1 intervention every 18 months)	(452)	75	204	279	e.173
<b>Unrated</b> Initially until formally	---	59	---	59	---

inspected (prior to opening / within 28 days of opening).					
ESTIMATE: New Businesses	---	---	---	<b>Circa e.120 – 150</b>	<b>Circa e.120-150</b>
ESTIMATE: No of premises likely to Cease Trading				Circa e.120 – 150	Circa e.120-150
<b>LOW RISK</b>					
D (1 intervention every 2 years)	(206)	55	85	<b>140</b>	<b>e.66</b>
E (premises should be inspected every 3 years or can be subject to an Alternative Enforcement intervention in lieu of inspection)	(551)	111	340	<b>451</b>	<b>Est. 100</b>

Certain low risk premises may, at the discretion of the authority, be subject to an alternative enforcement regime as per the Food Law Code of Practice:

- Category D premises should receive an intervention every 2 years. Such interventions can alternate between an intervention that is an official control and an intervention that is not an official control.
- Category E premises should be subject to an intervention every 3 years, which could be part of an Alternative Enforcement Strategy.

\*Priority for interventions will always lie with Higher Risk categories, consequently, lower risk (category D & E) may be de-prioritised, where resources are capped.

In addition to the planned interventions above, any ‘newly opened / change of ownership’ food premises will be targeted for inspection / an intervention. In 2024/25, there were 183 requests for advice in relation to food premises registration and new food businesses.

In addition to the planned primary inspections/interventions that are undertaken, food hygiene “revisits” are usually carried out where Businesses have been instructed to make improvement. This detailed involvement with Food Business Operators and their staff has proved to be an ideal opportunity to not only ensure improvements are made, but also to progress Best Practice standards and promote health and well-being in the wider context. It is estimated that approx. 150 revisits will be undertaken.

Premises eligible for a rating under the mandatory Food Hygiene Rating Scheme have their scores publicised on the following website: [www.food.gov/ratings](http://www.food.gov/ratings).

Businesses who initially fail to meet the highest standard (Food Hygiene Rating of 5), but who subsequently implement improvements are entitled to apply for a re-assessment visit, on payment of the relevant fee. This has caused an increase in demand for resources to undertake these re-inspections, but due to the importance of implementing the Scheme and the need to support businesses going forward, this area of work remains a priority. An all-Wales fee is set for this work (currently £255). This Council fully supports the national Food Hygiene Rating Scheme in Wales, and is committed to its promotion.

## **Food Standards & Feed Standards**

The inspection / intervention programme is based on the inspection rating scheme contained in Annex 5 of the Food Law Code of Practice and the Feed Law Code of Practice.

Dependent on risk, premises are due for an intervention within a range of 12 months to 5 years. Breaches are dealt with in line with the Authority’s Enforcement Policy.

Officers undertaking food standards and feed standards inspections will ensure that the food or feed business is meeting the legal requirements relating to quality, description, composition, labelling, presentation and advertising of food or feed, and of materials or articles in contact with food and feed.

At the discretion of the Authority and in accordance with the Code of Practice, certain lower risk food standards premises may be subject to an alternative enforcement intervention. The TS service has begun to avail themselves of the option of using topic-based inspections for certain “B” rated premises, focusing on the areas of a food business that present the highest risk and most likely to be non-compliant. This was suspended for 6 months in 2023-24 as the Authority participated in the Food Standards Agency pilot to revise risk assessments. It is anticipated that a new risk assessment programme for food standards will be implemented sometime in 2025/26.

Interventions in unrated establishments will be prioritised in accordance with Practice guidance.

The Feed Standards & Feed Hygiene inspection programme is set and funded by the Food Standards Agency and delivered regionally in conjunction with Swansea Trading Standards and coordinated by Neath Port Talbot.

Animal Health officers have the responsibility of inspecting feed hygiene systems on farms alongside their animal welfare duties. These officers are assessed as competent as per the Code of Practice. Furthermore, a new member of staff is currently being assessed for feed competency to fulfil these duties. Feed manufacturers and retailers are inspected by Trading Standards Officers with the appropriate qualification and competencies.

<b>Food Standards Interventions 2025/26 as per Current Food Code of Practice Risk Assessment Scheme</b>			
<i>Category</i>	<b>No of Premises 2025-26</b>	<b>Interventions by 31/3/2026</b>	<b>Estimate Number of interventions</b>

	Total no. of Premises in Category	No. of premises carried forward (backlog- due prior to 31/3/25).	No of premises due 1/4/2025-31/3/2026.	Cumulative Planned (inc. Backlogs) due by 31/3/2025	Revisits 2025/26	2025/26 for work planning (year ahead)
A. (1 Intervention per year)	13	0	13	13	1	12
B. (1 intervention every 2 years)	422	99	174	273	10	200
C. (1 intervention every 5 years / AES)	705	190	6	196	2	150
Unrated	235	182	182	182	10	150
<b>Total</b>	<b>1,322</b>	<b>471</b>	<b>375</b>	<b>651</b>	<b>22</b>	<b>512</b>

\*In accordance with the Framework Agreement and frequencies set in the Food Law Code of Practice (Wales):

- Food Standards Category B premises should receive an intervention every 2 years. Such interventions can alternate between an intervention that is an official control and an intervention that is not an official control, if the business is broadly compliant (COP 5.2.7.1.5.2).
- Food Standards Category C premises should be subject to an intervention every 5 years, which could be part of an Alternative Enforcement Strategy.
- Where resources are restricted, interventions at Category “A” and unrated businesses are prioritised.
- There was significant variation in the intervention programme as a consequence of the Food Standards Pilot, but following its completion, Trading Standards has now reverted to the current risk assessment system.

Data for compilation of the inspection programme has been submitted to the FSA and a proposal of the service’s obligation has been received, to be confirmed shortly.

<b>Planned Feed Standards Interventions</b> 2025/26 (& estimated for 2026/27).		
Premises Type	2025/26	Estimated 2026/27 for work planning (year ahead)
<b>Manufacturer</b>	2	3

Co Product Producer	1	3
Mobile Mixer	0	0
Importers	0	0
Feed Stores	4	0
Distributor	0	0
Transporter	0	0
On Farm Mixer (Annex II)	1	2
On Farm Mix	1	1
Pet Food Manufacturer	1	1
Supplier of feed materials/ Surplus Food	5	10
<b>Sub Total "Above The Line"</b>	<b>15</b>	<b>20</b>
Arable Farms	3	2
Livestock farms	56	50
Total due for inspection	<b>74</b>	<b>72</b>

### 3.1.3 Inspections / Interventions Resources

#### Food Hygiene

The following table contains the current staffing structure breakdown.

<b>Table 3(a) – as at 1/4/2025 (expressed as FTE's- Full Time Equivalents)</b>	EHORB (EHO)	EHORB (Higher Risk premises)	Non-EHORB (Support Staff/Trainees)	Total
Team Leader (F&HP)	1.0			
Senior EHO (F&HP)	2.0**			
EHO (F&HP)	4.0**			
Vacant EHO (F&HP)	1.68			
Enforcement Officer		0.86		
Support Officer			1.0	
Trainee			1.0	
<b>Total as at 2025-04-01</b>	<b>8.68</b>	<b>0.86</b>	<b>2.0</b>	<b>11.54**</b>
<i>Historic Totals (trends):</i>				
<i>Total as at 2024-04-01</i>	<i>8.68</i>	<i>0.86</i>	<i>1.0</i>	<i>10.54**</i>
<i>Total as at 2023-04-01</i>	<i>8.68</i>	<i>1.86</i>	<i>1.0</i>	<i>11.54**</i>
<i>Total as at 2022-04-01</i>	<i>6.37</i>	<i>2.86</i>	<i>1.0</i>	<i>10.23**</i>
<i>Total as at 2021-04-01</i>	<i>7.16</i>	<i>1.86</i>	<i>1.0</i>	<i>10.02**</i> ** Note: Various officers Seconded to WG funded Health Protection team

Food Hygiene: All EHOs currently in post have either the B.Sc. (Hons) degree, M.Sc. or Diploma in Environmental Health and are approved by EHRB (Environmental Health Registration Board). All Enforcement Officers hold the Higher Certificate in Food Control, or equivalent. The Table above illustrates the FTE number of staff available to work on food hygiene law enforcement (food hygiene and associated matters) including support staff and their relevant competencies as per the Code of Practice.

There is the facility to redeploy Food Hygiene qualified staff to or from other parts of the service (particularly the General Environmental Health team) when necessary (see Chapter 4 on Resources for fuller details on the current staffing structure). However, this can cause pressures within any service providing the release of staff and often risks causing unintended “rips and tears” with workloads, so is always managed as sensitively as possible. Temporary staff and locums/contractors have also been utilised in previous years to support the service, when additional staffing resource have been needed, and funding has been facilitated.

### Staffing Allocation (Apportionment Estimates): Required & Allocated

	Food Hygiene Resources		
	Estimate of Required Resources (FTE)	Allocated resources (FTE)	Relative priority assigned
Food hygiene inspections: Cat A-C	3.0	3.0	High / Medium-high
Food hygiene inspections: Cat D	0.8	0.5	Medium-low
Food hygiene inspections: Cat E	0.5	0.1	Low
Food hygiene Complaints	1.4	1.4	High / Medium-high
Food hygiene Sampling	0.2	0.2	Medium
FH New Businesses & Registrations	1.0	1.0	Medium-high
FH Advice & Promotional work	0.3	0.2	Medium / Medium-low
FH Revisits	0.5	0.5	Medium-high
FH Rating Scheme Re-Rating visits	0.2	0.2	High
FH Rating Scheme enforcement	0.1	0.0	Resources diverted when required.
FH Prosecutions	0.1	0.0	Resources diverted when required.
Food Fraud investigations and surveillance	0.1	0.0	Resources diverted when required.
Food hygiene Unrated inspections & work carried forward.	0.3	0.3	High / Medium-high
Food Related Infectious Disease control, Inc. food poisoning cases & outbreaks	1.6	1.2	High Note: Shared with “Interim HP” team, during 2022-2025.
Food hygiene Approved Premises	0.1	0.1	High
FH Import & Export; & Novel foods	None at present	0.0	Resources diverted when required.
FH Service Improvement (Monitoring, Planning, Reviews, Policies, Consultations)	0.8	0.7	High / Medium-high
Food hygiene safety alerts	0.1	0.1	Medium

Other Food hygiene work	0.2	0.0	Resources diverted when required.
Non-hypothecated / generic enforcement resource		0.04	Low
Non-hypothecated Admin/Support	1.0	2.0	High / Medium-high
<b>TOTALS (in FTE's):</b>	<b>12.3</b>	<b>11.54</b>	

It is estimated that the required resource to deliver all aspects of the Framework Agreement and Code of Practice is 12.3 FTE.

## Food Standards and Feeding stuffs

<b>Trading Standards: Food by Full Time Equivalent of Officer 2025-26</b>					
	DTS	DCA	DCATS or equivalent	Unqualified	TS Total
TS Team Leader	0.3	0	0	0	0.3
Senior TSO	0	0	0.5	0	0.5
TSO	0.5	0	0.5	0	1.0
Enforcement Officer	0	0	0.8	0	0.8
TS Assistant	0	0	0	0.1	0.1
Admin	0	0	0	0.1	0.1
<b>Total as at 1.4.2025</b>	<b>0.8</b>	<b>0</b>	<b>1.8</b>	<b>0.2</b>	<b>2.8</b>
<i>Historic Totals (trends):</i>					
<i>Total as at 1.4.2024</i>	<i>0.8</i>	<i>0</i>	<i>1.8</i>	<i>0.2</i>	<i>2.8</i>
<i>Total as at 1.4.2023</i>	<i>0.8</i>	<i>0</i>	<i>1.8</i>	<i>0.2</i>	<i>2.8</i>
<i>Total as at 1.4.2022</i>	<i>0.8</i>	<i>0</i>	<i>1.8</i>	<i>0.2</i>	<i>2.8</i>
<i>Total as at 1.4.2021</i>	<i>0.8</i>	<i>0</i>	<i>1.8</i>	<i>0.2</i>	<i>2.8</i>

<b>Trading Standards: Feed by Full Time Equivalent of Officer 2025-26</b>					
	DTS	DCA	DCATS Qualified	Competent (not qualified)	Total
TS Team Leader	0.1	0	0	0	0.1
Senior TSO (Trading Standards Officers)		0	0.2	0	0.2
TSO	0.1	0	0.1	0	0.2
Enforcement Officer	0	0.0	0	0.8	0.8
TS Assistant	0	0	0	0	0
Admin	0	0	0	0.1	0.1
<b>Total as at 1.4.2025</b>	<b>0.2</b>	<b>0.0</b>	<b>0.3</b>	<b>0.9</b>	<b>1.4</b>
<i>Historic Totals (trends):</i>					
<i>Total as at 1.4.2024</i>	<i>0.2</i>	<i>0.0</i>	<i>0.3</i>	<i>0.9</i>	<i>1.4</i>
<i>Total as at 1.4.2023</i>	<i>0.2</i>	<i>0.0</i>	<i>0.3</i>	<i>0.9</i>	<i>1.4</i>
<i>Total as at 1.4.2022</i>	<i>0.2</i>	<i>0.0</i>	<i>0.3</i>	<i>0.9</i>	<i>1.4</i>
<i>Total as at 1.4.2021</i>	<i>0.2</i>	<i>0.0</i>	<i>0.3</i>	<i>0.9</i>	<i>1.4</i>

The full staffing structure can be found at Appendix C.

The proportion of time spent by each officer on the feed and food functions can be seen in the tables below.

<b>Food Standards Function</b>	<b>Estimate of Required Resources (FTE)</b>	<b>Allocated (FTE)</b>
<b>Interventions</b>	2.5	2
<b>Complaints</b>	0.3	0.2
<b>Home Authority / Primary Authority</b>	0.3	0.1
<b>Business Advice</b>	0.3	0.1
<b>Sampling / Incidents</b>	0.2	0.1
<b>Food Hygiene Primary Production Inspections</b>	0.1	0.1
<b>Liaison &amp; Promotion</b>	0.1	0.1
<b>Food Safety alerts</b>	0.2	0.1
<b>Sub-Total</b>	<b>4.0</b>	<b>2.8</b>
<b>Estimated additional resource required to deal with Backlog (short term: 3 years approx.)</b>	<i>2.0 in addition to above</i>	

At current intervention rates, to achieve targets as per the current food code of practice (that is, inspection of all A, B, C rated and Unrated businesses) and taking into account complaints, sampling work and non-food work, the department would need to increase the number of full time equivalent qualified to approximately 6.0 to overcome the backlog in a reasonable period of time, currently estimated as three years.

These figures will be reviewed should a new risk assessment scheme be implemented following the pilot. As previously discussed, the FSA recovery plan has now drawn to a close, however the Agency is developing a new method of measuring performance, and NPT TS has representation on the discussion group.

<b>Feed Function</b>	<b>Estimate of Required Resources (FTE)</b>	<b>Allocated (FTE)</b>
<b>Inspections</b>	3	0.8
<b>Complaints</b>	0.2	0.05
<b>Home Authority / Primary Authority</b>	0.1	0.05

<b>Business Advice, Liaison &amp; promotion,</b>	0.1	0.05
<b>Sampling / Incidents</b>	0.1	0.05
<b>Food Hygiene Primary Production Inspections</b>	0.1	0.1
<b>Alerts</b>	0.1	0.1
<b>Sub- Total</b>	3.7	1.2

### 3.1.4 Targets and Priorities for 2025/26

#### Food Hygiene

1. To ensure a high level of Business compliance with Food Hygiene legislation. This is illustrated by the percentage of food businesses which are classed as “Broadly Compliant” when assessed against the definition provided by the former National PI / Public Accountability Measure PAM 023: “The percentage of food establishments which are ‘broadly compliant’ with food hygiene standards”.
2. To undertake a suitable variety of Regulatory Interventions to promote good health and ensure safe food and legal compliance to avoid dangerous health risks. This will include the issuing of Ratings and the administration of the national Food Hygiene Rating Scheme, which has been mandatory since 28<sup>th</sup> November 2013.
3. To undertake inspections / interventions at high-risk premises for food hygiene (See table 2(a) for number of inspections due). The target annually is historically based on the inspection of 100% of Category A premises; and 100% of Category B premises; and 100% of Category C premises. With respect of Category D and Category E premises, interventions can be part of a risk-based strategy.
4. To inspect or otherwise assess new businesses for compliance with legal standards.
5. To respond to infectious disease incidents, complaints and enquiries within the target response time adopted by the Authority, based on Public Health Wales recommendations.
6. To promote the improved understanding and implementation of food safety management systems (FSMS), based on “HACCP (Hazard Analysis and Critical Control Points)” principles for food businesses in the County Borough.
7. To further develop a cross-discipline approach to undertake certain combined food hygiene and food standards assessments, following appropriate training and up-skilling of staff.

#### Trading Standards: Food Standards and Feed

1. To assess businesses for compliance with legal standards via a variety of intervention tools.
2. To ensure that significant breaches are investigated proportionately and appropriately in line with the Enforcement Policy.

3. To complete the annual food sampling plan.
4. To complete the regional feed delivery plan
5. To maintain the Intelligence Operating model across the service.
6. To maintain staff competency and continue to deliver training for all officers
7. To create paths of succession and develop junior staff within the department.
8. To promote good practice within food & feed businesses.
9. To implement the new management information service within the department.
10. To explore the potential of the new management information system in improving service delivery (mobile working etc.).

### **3.1.5 Possible Restrictions on Providing Service**

#### **Trading Standards: Food Standards, Feed Standards and Feed Hygiene**

The Trading Standards Service continues to experience staffing disruption due to sickness. Consultants have been drafted in to help with interventions, which have accordingly been prioritised to areas of greatest demand.

Projects and targets need to be re-assessed to focus on the areas of greatest need.

Through implementing the Intelligence Operation Model and utilising the intelligence led approach advocated by National Trading Standards, the department is focussing on the areas which require most attention.

In its succession planning the service has two trainees in place, neither will be food qualified in the short term. However, in the medium to long term it should provide extra resilience for non-food work, allowing appropriately qualified officers to concentrate on food work. A third officer will be undertaking the feed standards competency paper which will provide extra resilience for inland feed business interventions and inspection, but this is not likely to benefit the authority before 2026/27.

Continued and rising detection of food and feed breaches mean that officers are spending more time investigating infringements, which takes them away from programmed interventions. Investigation of failures in the food chain will always take precedence.

#### **Food Hygiene**

The Food Hygiene section has an officer on a continuing secondment opportunity (fully funded by Wales Government) to the Regional Health Protection collaboration initiative, with the Swansea Bay University Health Board (formerly the Regional TTP team).

## Areas common to both Services

Both sections have a wide remit, but food and feed work is a high priority. Nevertheless, other priorities can take precedence, and resources would need to be diverted.

Due to limitations of staff resources, extended periods of absence can lead to a drop in service provision – this issue is constantly monitored. Reactive and work with high-risk businesses is always prioritised.

The resourcing and undertaking of complex investigations and prosecutions can lead to a heavy demand on officer time and on productivity, but this work is guided by the need to protect public health and ensure a high level of confidence in the food chain. Accordingly, resources are allocated when necessary and other tasks are re-prioritised as appropriate.

It is important to maintain officer competencies across a variety of disciplines to continue to remain flexible and of optimum value when emergencies occur.

A new back-office database system, known as IDOX was implemented in the last quarter of 2024/25. The continued configuration and data cleansing of this system will mean significant downtime for officers in both services. As with the current system, there appears to be no plans for full time systems administrators, most data cleansing, configuration and management will still need to be carried out by officers from TSAH (Trading Standards & Animal Health) & FH.

### 3.1.6 Experience of Officers and Access to Expert Information When Necessary

All relevant officers within the Section are appropriately qualified and experienced to deal with routine and many unusual matters associated with all current types of food & feed premises within the area. The EDR (Employee Development Review) and supervision review process means that officers' competency is continually monitored, and training is delivered where required.

## Communication, Reference and Expert Support

Trading Standards				
Police National Legal Database (PNLD)	National Anti-Fraud Network (NAFN)	IDB (The Trading Standards Intelligence Database)	British Standards Institute (BSi)	TSSW Food Standards Reference Manual
Public analyst (s) (monthly meetings between TSAH and Minton Treharne & Davies Public Analyst services)	Trading Standards Regional Intelligence Analyst and Local Intelligence Officer network.	TS Business Companion	Food Sampling Surveillance System	Trading Standards Wales Lead Officer Network

<b>Food Hygiene</b>				
TARIAN- a joint NHS & LA database for managing Food Poisoning outbreaks and other Infectious Diseases.	The National Health Service & Public Health Wales: Consultants in Communicable Diseases.	Public Health Wales & Swansea Bay University Health Board: including the Microbiology Testing laboratories.	All Wales Food Safety Expert Panel, convened through Directors of Public Protection & Environmental Health Wales.	
<b>Common to both Services</b>				
Knowledge Hub	Smarter Communications / RIAMS (as provided by the Food Standards Agency)	Food Standards Agency	Coordinating groups and panels specialising in food and feed enforcement (inc. Primary Authority)	Enforcement Legal Process Manual
NPT Legal Services	Internet & Email	Social Media	National Food Crime Unit	Case Law: National Archive

Where additional expertise is required, the Head of Service will be briefed and a suitable response will be formulated.

## **Coordinated Enforcement**

### **Trading Standards: Food Standards & Feed**

Trading Standards is a member of the Glamorgan regional coordinating group for food standards, which is comprised of the seven authorities formerly making up the old county of Glamorgan, plus Newport City Council and representatives from two Public Analyst Laboratories.

The service participates in surveys and exercises held under the auspices of the Glamorgan Group, Trading Standards Wales (TSW) and the Food Standards Agency and where appropriate or resources allow, projects such as Operation Opson the Europe-wide survey into food fraud.

The service is an active member of the regional coordination group of Trading Standards Wales. Information received feeds into the tactical and strategic assessments carried out by TSW which helps focus resources and identifies emerging threats in the county. NPT also has representation on specific food & feed related working groups and projects, such as Trading Standards Wales Spotlight – an annual event promoting the work of the service nationally; and is also a member the training coordination group which develops and delivers food, feed and enforcement related training.

Neath Port Talbot Trading Standards represent Neath Port Talbot & Swansea's interests in regional feed enforcement. Regular communication takes place between the two authorities on feed issues and the delivery of feed enforcement across the Neath Port Talbot / Swansea region.

Furthermore, the service contributes to regional priority setting via the local intelligence liaison officer network thereby contributing to TSW strategic and tactical assessments, including food and feed.

## Food Hygiene

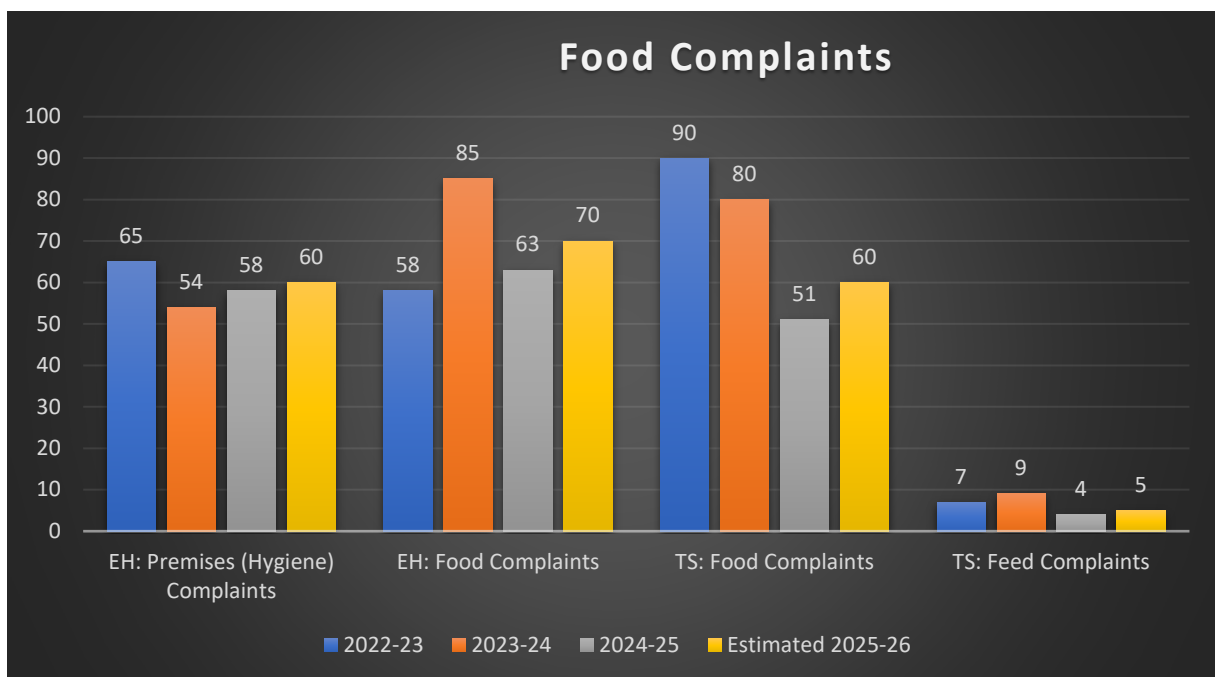
The Food Hygiene and Health Protection team work closely and liaise with the FSA, other Local Authorities, Public Health Laboratory services, Public Health team of Public Health Wales, and the Public Analysts when expertise is required.

The Food Hygiene team provides representation for the Wales Food Safety Expert Panel, and the Wales Food Hygiene Rating Scheme Steering Group, and participates within the Welsh Food Microbiological Forum.

### 3.2 Food and Feed Complaints

The Authority will continue to ensure that all notified complaints in relation to food and feeding stuffs are suitably investigated and dealt with promptly, consistently, and as per the enforcement policy and internal policy and procedure.

The graph below illustrates the number of complaints / service requests received by the services over the past 3 years and estimated number for the forthcoming year.



Resources for investigating food complaints are targeted on a risk basis. The available resources are focused on significant food or feed safety risks. As a consequence, certain categories of complaint may receive a more streamlined response.

### 3.3 Primary Authority Scheme & Home Authority Principle

The Authority will continue to provide advice and assistance to food businesses for which we are the originating authority and to any that may set up their decision-making centre within the Authority. The department has made a commitment to initiate Primary Authority (PA) partnerships, including food and feed. Although the Trading Standards service had made a commitment to expand its number of partnerships, it no longer has a resource dedicated to creating PA partnerships with local businesses. It has however established a partnership with a locally based feed manufacturer in 2024.

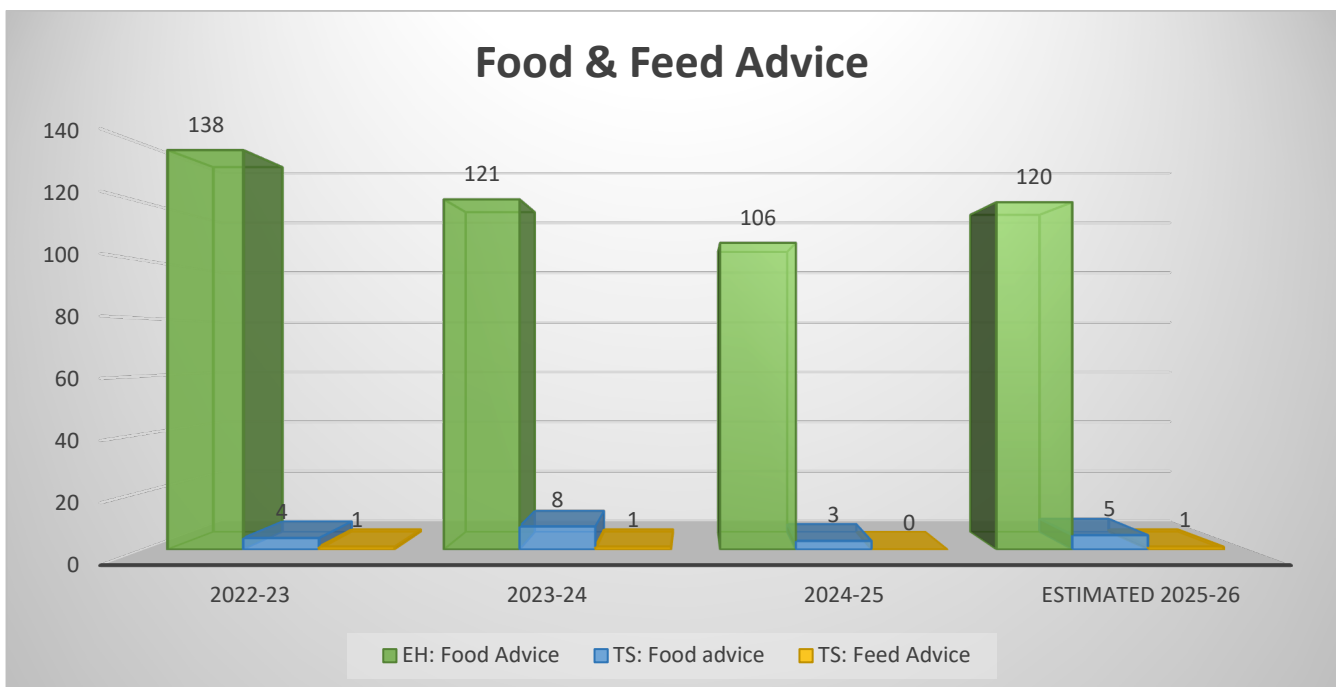
The Primary Authority scheme requires UK enforcement authorities to be mindful of national inspection plans organised with multi-site businesses, to ensure consistency of approach on a nationally coordinated basis (See also the Enforcement Policy and Primary Authority Policy). Enforcing authorities are legally obliged to consult with the Primary Authority of the business under investigation.

Although there is no legal obligation to contact the local authority of a non-PA business based elsewhere which may have infringed within NPT, Trading Standards & Animal Health and Food Hygiene teams will always liaise with that authority.

The department will liaise with the Food Standards Agency and relevant border inspection points / ports on significant food or feed breaches with a potential national or international impact.

### 3.4 Advice to Businesses

The Services charge for bespoke or enhanced consultancy type assistance- such as examination of products, systems, and labels. Whereas simple “signposting” to sources of advice will attract no fee.



## Trading Standards: Feed

There has been a small surge in enquiries from new businesses looking to produce pet treats / food from domestic premises. In some instances, this has led to new feed businesses.

The service is making regulatory visits to a new raw pet food manufacturer in the County Borough; this will require significant resource from TSAH to ensure compliance.

### 3.5 Food and Feed Sampling

Food sampling trends, intelligence and Food Standards Agency priorities are examined, analysed, and used to inform the Authority's food sampling plan.

Priority areas for sampling are identified on the basis of safety, consumer or trade detriment, type of food or feed business and risk. Additionally, food samples are often taken as part of a programmed intervention if deemed appropriate or in connection with an investigation.

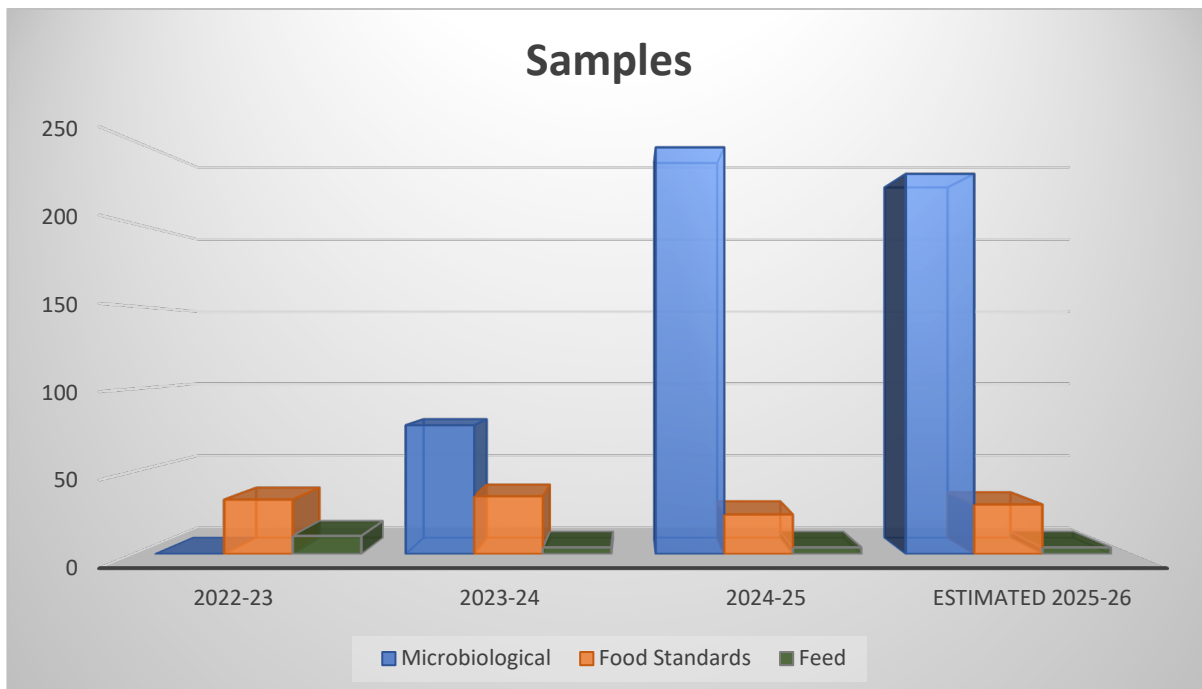
The Authority participates in various co-ordinated sampling programmes including:

Trading Standards: Food Standards & Feed	Food Hygiene
Trading Standards Wales Surveys;	The All Wales 'Shopping Basket' Food Sampling Survey
Glamorgan Trading Standards Group Surveys	Welsh Food Microbiological Forum targeted surveys
Public Analyst co-ordinated surveys	Locally manufactured products
Operation Opson	
The Food Standards Agency sets and funds the Welsh feed sampling programme	
<b>Common to both services</b>	
<b>Food Standards Agency led and/or funded surveys</b>	

## Trading Standards

Trading Standards, both working alone and within its regional partnerships, have identified non-declaration of allergens, colour, additives, and descriptions at takeaway outlets as the biggest problem areas. Additionally, it will carry out sampling of manufacturers and wholesalers and imported food, based within the County Borough.

Raw pet food has been identified as a potentially significant safety risk.



## Resource Allocation

### Food Hygiene

Approximately 3 days a month are usually spent by one officer (usually a Support Officer) sampling foods for microbiological analysis and undertaking the subsequent administration, although this process is overseen by qualified officers, including if any follow up actions are required.

### Trading Standards: Food Standards & Feed

Most food standards samples are taken by qualified and competent officers. The service has a policy of only taking official control samples rather than expending resources in having to resample after an unofficial control sample has been taken.

Furthermore, the Authority is notified of sampling funded by the FSA but undertaken by Public Analysts. In the past this has resulted in follow-up work to be undertaken by NPT, taking the form of further sampling, advice, or formal enforcement action.

### Sample Submission

Samples taken are submitted to either the local Microbiology testing laboratory (PHW-Carmarthen) within 24 hours of sampling or Public Analyst as appropriate.

## 3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

All formal notifications (of all types of Infectious Disease notifications) are recorded on an NHS shared platform (called TARIAN). Subsequent investigations are based on the type of organism,

the number of cases, and are in accordance with the over-arching Communicable Disease Outbreak Control Plan for Wales (issued by the Chief Medical Officer – Wales). Additionally, there are various supporting infectious disease investigation procedures utilised locally by Neath Port Talbot.

**Table 5(d): Numbers of Notifications of all Infectious Diseases, including Food-related**

Organism	2020-21	2021-22	2022-23	2023-24	2024-25	(Estimate for work planning: 2025-26)
Campylobacter	170	210	220	226	254	(e.250)
Salmonella	7	15	15	16	37	(e.35)
Cryptosporidium	12	7	17	17	24	(e.25)
Others	41	77	120	66	175	(e.140)

Periodically, we receive additional complaints from members of the public as self-referrals. These are often reported as involving symptoms suggestive of suspected cases of food poisoning. Initially, advice is given for the case to report to their GP, for assessment and testing. Workloads are consistently high in this area of work, and where Emergencies / Major Outbreaks occur, they are dealt with as top priority (owing to their medical and public health significance), with other work being re-scheduled.

The existing internal resources are usually sufficient to deal with the estimated number of food poisoning cases for the forthcoming year. Additional capacity exists within the Health Protection team, who are also continuing to support Care Homes within the borough, with infection control matters.

### 3.7 Food & Feed Safety Incidents

In line with the current Code of Practice, the services have documented procedures which outline the action to be taken following the receipt of a food or feed alert. Activity is recorded on the services' Public Protection database.

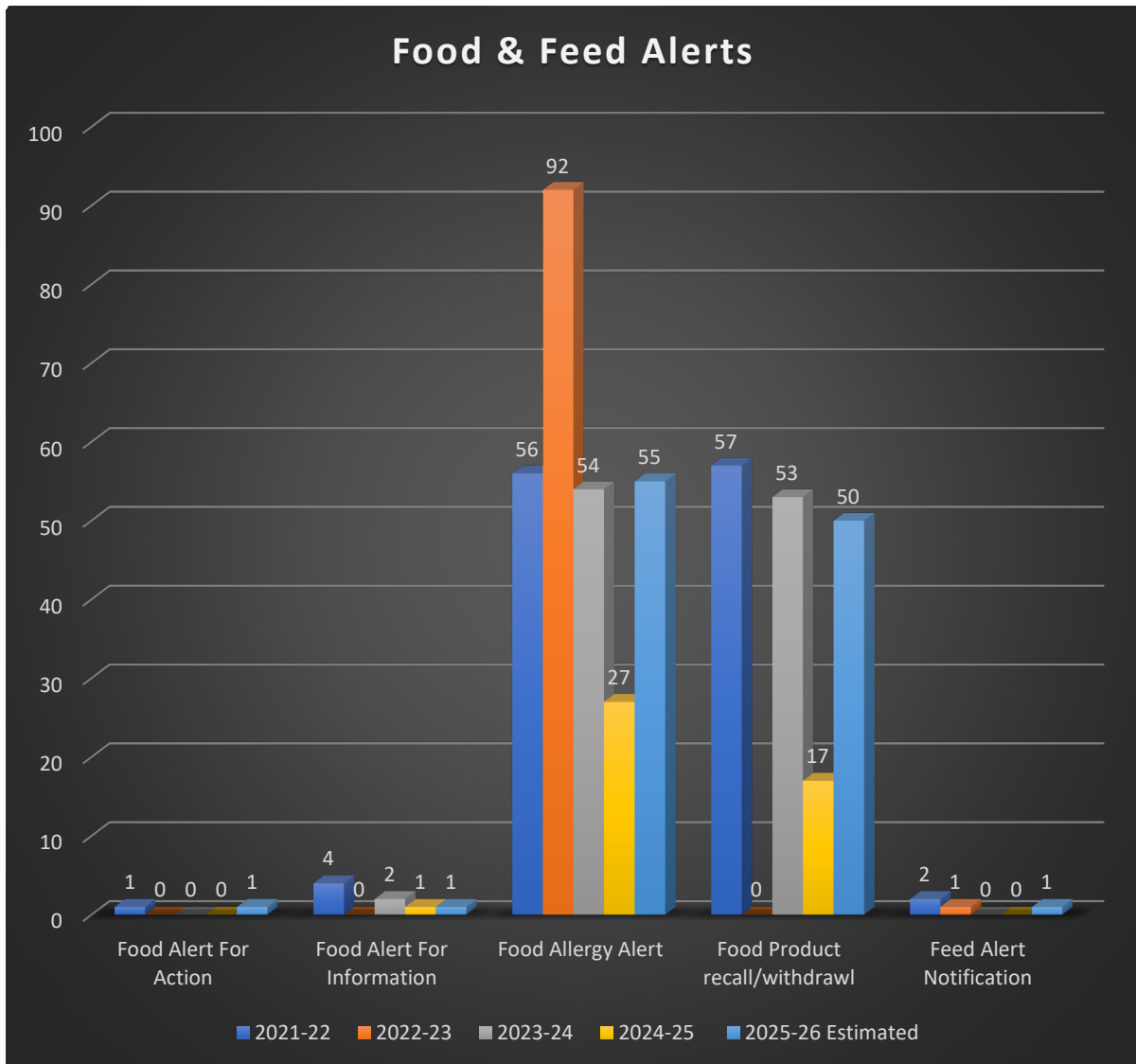
Alerts are periodically received via a direct email from the Food Standards Agency Wales (FSA-W) to enforcement officers. Though fairly uncommon, the warning procedure for food incidents recognises that Food Alerts For Action (FAFA) are required to be dealt with quickly and are treated as a very high priority – which means resources from other work needs to be redirected to respond to the FAFA.

Food Hygiene	Trading Standards
Microbiological related alerts	Feed Alerts
Foreign Body related alerts	Allergy related alerts
	Labelling
	Chemical Contamination

Food Alerts for Information or Food Allergy Alerts are more common, and most food alert warnings received require only a small officer resource, mainly to re-publicise risks locally via the Services' social media accounts. The Trading Standards & Animal Health service receives a significant number of Allergy Alerts, most of these are promoted locally, through Social Media

or other methods, with only a few requiring significant actions. When necessary, directly affected businesses are contacted and advised to affect a withdrawal.

When breaches are detected in Neath Port Talbot which need reporting to initiate an alert, the Services will immediately contact the Food Standards Agency Wales via the applicable food/feed Incident Report form and established mechanisms, and the Services will liaise with other partners as appropriate.



Existing internal resources are currently sufficient to deal with the estimated number of food / feed alerts incidents. Resources from other parts of the directorate may need to be redeployed should an incident be particularly large or wide ranging.

### 3.8 Liaison with other Organisations

The authority has a number of arrangements to ensure enforcement action is consistent with neighbouring local authorities. Officers participate in a variety of external liaison groups, which are summarised below:

<b>Resource Allocation for liaison with Partners</b>		
<b>GROUP</b>	<b>AVERAGE RESOURCE ALLOCATION</b>	
<b>Trading Standards &amp; Animal Health</b>		
Glamorgan Food Group	4 days per year	1 Officer
Neath Port Talbot / Swansea Feed Region	8 days per year	1 Officer
Glamorgan Group (Chief Officers)	3 days per year	1 Officer
TSW Training Group	8 days per year	1 Officer
TSW Feed Lead Officers	4 days per year	1 Officer
Trading Standards Wales Executive	8 days per year	1 Officer
Welsh Primary Authority User Group	4 days per year	1 officer
<b>Food Hygiene &amp; Health Protection</b>		
EHW Food Safety (Task Group & Expert Panel)	4 days per year	1 Officer
EHW Communicable Disease (Task Group & Expert Panel)	4 days per year	1 Officer
EHW: Environmental Health Group	4 days per year	1 Officer
EHW: Food Hygiene Rating Scheme Steering Group	2 days per year	1 Officer
Welsh Food Microbiological Forum	3 days per year	1 Officer
Meetings with CCDC (Consultant in Communicable Diseases, of Public Health Wales)	Estimate 2 days per year	1 Officer
<b>Joint</b>		
Consultee to Building Control & Planning Department & Licensing Department.	Estimate 2 consultations per week	1 Officer
Regulatory Delivery	Estimate 2 days per year	2 Officers
National Food Crime Unit	Estimate 2 days per year	2 Officers
Ad hoc meetings with NPTCBC Education and Social Services Departments	4 days per year	1 Officer
<b>Key: TSW = Trading Standards Wales</b> <b>EHW = Environmental Health Wales</b> <b>CCDC = Consultant in Communicable Diseases</b>		

### 3.9 Promotion & Intelligence

Educational and promotional activities are considered to be important aspects in the delivery of a varied and comprehensive food safety service as the following table illustrates.

<b>Food &amp; Feed Promotion</b>		
<b>Method</b>	<b>Trading Standards &amp; Animal Health</b>	<b>Food Hygiene &amp; Health Protection</b>

Primary Authority Scheme	Y	Y
Active promotion of national food Safety events	Y	Y
Liaison with NPTCBC food delivery services	Y	
Buy with Confidence	Y	Y
Facilitating hand washing demonstrations in educational establishments and voluntary groups as requested.		Y
Advice to consumer groups and attendance at consumer education events,	Y	Y
Liaison with other services within LA	Y	Y
Targeted advice, seminars, and training sessions to FBOs & FeBOs	Y	

The Authority continues to promote food safety, food standards and feed hygiene/standards in all areas of its work. Officers encourage businesses to implement robust systems to achieve and maintain compliance and promote best practice.

Prospective business owners are encouraged to seek the advice of the department before the food or feed business begins operation to try and ensure compliance from the beginning of trading. However, there is a charge for the provision of tailored advice. There is a wealth of free advice on GOV.UK, various Trading Standards websites (such as Business Companion) as well as on the websites of NPTCBC and FSA. Trading Standards also regularly attends the Neath Port Talbot Economic Development new business seminars, to speak with prospective or new business owners and offer informal advice.

The Food Hygiene team also has a role with regards to health promotion, particularly when interacting with businesses during normal activities and contact. Although there is no specific staffing resource allocated to this function, the daily contacts which the teams have with businesses are an important opportunity to positively influence the wider business community, their employed staff, and customers.

<b>Intelligence: Dissemination &amp; Retention</b>		
<b>Method</b>	<b>Trading Standards &amp; Animal Health</b>	<b>Food Hygiene &amp; Health Protection</b>
<b>Knowledge Hub (reference and discussion site).</b>	•	•
<b>IDB (Intelligence Database) (The Trading Standards Intelligence Database).</b>	•	•
<b>National Food Crime Unit</b>	•	•

<b>RIAMS (Regulatory Information and Management Systems) / Smart Communications (as provided by the Food Standards Agency).</b>	•	•
<b>National Anti-Fraud Network (NAFN).</b>	•	
<b>Trading Standards Regional Intelligence Analyst and Local Intelligence Officer network.</b>	•	
<b>FSSNet – Food Sampling System.</b>	•	
<b>TARIAN.</b>		•
<b>Idox- LA enforcement database</b>	•	•
<b>Coordinating groups and panels specialising in food and feed enforcement.</b>	•	•

## 4.0 RESOURCES

### 4.1 Financial Allocation

The table below provides a summary of expenditure and income for the Food Service.

<b>Table 7 – Budget figures</b>	
<b>Revenue Budget</b>	<b>2025-26</b>
<b>Expenditure</b>	<b>£</b>
Staffing- Food Hygiene	450,709
Staffing- Infectious Disease	181,696
Staffing- Food Standards	188,594
Staffing- Animal Feeding Stuffs	73,264
Transport (FH & TS)	1,008
Training (TS)	4,840
Training (FH & General EH)- shared budget	8,711
Legal Fees (EH & TS)- funded as required	0
Sampling & Analysis – Food Hygiene	778
Sampling and Analysis – Trading Standards – Food & Feed only	19,484
<b>Total Expenditure</b>	<b>1,133,738</b>
<b>Income</b>	
Government Grant	0
Other Income - inc. Business Advice (estimate)	£5,000
Feed funding (estimate)	£10,000
<b>Total Income (estimate)</b>	<b>£15,000</b>
<b>Estimated Net Expenditure</b>	<b>£1,118,738</b>

### 4.2 Professional Development

The services are committed to staff professional development, and the two services maintain separate training plans. The Trading Standards team training and development budget for 2025/26 is £4,840. The Food & Health Protection team have a shared training and development budget with the General Environmental Health service, and it is set at £8,711 for 2025/26.

#### Trading Standards & Animal Health

All food standards & feed enforcement staff participate in one-to-one supervisory reviews with their supervisor or team leader approximately every 10-12 weeks, where Continuing Professional Development (CPD) is monitored, and officers receive an annual appraisal, now replaced by employee development reviews which includes an assessment on training and

development needs. Food CPD recording runs on a calendar year basis and feed CPD runs over the financial year. A central, electronically held spreadsheet is available to staff to allow them to totalise and monitor progress on their training CPD, the authority has recently adopted a new training recording system which should mean that spreadsheet will be phased out in the near future and will improve training record keeping.

Training is arranged locally with trainers commissioned by Neath Port Talbot TS or regionally delivered by the Food Standards Agency or by Trading Standards Wales (TSW). During the pandemic, distance learning and online courses became the norm. However, since the end of that period, there has been a partial shift back to classroom learning. The TS Team Leader is the TSW strategic lead officer for training and periodically circulates a collation of online training opportunities to TSW and to interested parties within NPT.

Monthly meetings have resumed within Trading Standards & Animal Health and topic specific briefing sessions will resume this year – this will include food and feed. Regular meetings of the two teams within Trading Standards also take place. Due to the hybrid way of working and the Authority's policy of reducing available office space these have meetings have increased in value and are vital in supporting all staff and particularly new starters.

Weekly TS&AH briefing notes are circulated to summarise legislative and service developments, news and training opportunities, these are also sent to the Food and Health Protection Team leaders, Team Manager and Head of Service for information.

Despite working remotely, online discussion groups via Microsoft TEAMS also encourage officers to consult with their colleagues, to discuss investigations and share information. The preference is for meetings to take place face to face as these are found to be far more effective than online meetings.

## **Food Hygiene & Health Protection**

Regular Food Hygiene Team meetings are held to discuss ongoing food and communicable disease issues, including work planning and outputs, and complex cases.

The Authority participates in the All-Wales Communicable Disease Lead Officer Training events funded by the Wales Centre for Health. All-Wales update training on food related topics is also provided by the Food Standards Agency on key issues but is usually two officers per local authority and is often free. Officers are expected to maintain their competencies and undertake training to ensure their continuing professional development (CPD) by undertaking suitable self-study or training equivalent to a minimum of 20 hours per annum (from 1<sup>st</sup> January, annually). This is monitored by the respective service managers and discussed during the one-to-one reviews.

### **4.3 Legal Expenditure**

Legal fees in connection with feed, food standards and food hygiene cases/prosecutions have remained fairly constant over the past few years, apart from one major case which resulted in an application being made to the FSA for assistance. While there is no direct budget allocated for this purpose, resources are provided as needed from both the commissioning Directorate and Corporate legal services, and costs incurred by both are applied for at the conclusion of the legal action.

Overspends/shortfall in resources are reported to the Head of Service for subsidising on an ad-hoc basis, or from central reserves.

As previously stated, financial support may be available from the Food Standards Agency, for either Trading Standards or Food Hygiene teams who face taking legal action in cases which have significance to the food chain and/or a national impact. The Food Standards Agency have supported Trading Standards in this way in the recent past.

Receipts from the incentivisation scheme under the Proceeds of Crime Act can be re-invested in enforcement related actions, although these receipts are irregular and infrequent and should not be relied on.

Trading Standards Intelligence indicates continued breaches of allergen, adulteration and misdescription legislation within Neath Port Talbot.

## **5.0 QUALITY ASSESSMENT**

The quality of the food service will be regularly assessed to ensure the Service Delivery Plan and Food Standards Agency framework agreement on local authority enforcement ('The Framework Agreement Standard') is being achieved.

### **5.1 Management Monitoring**

Evaluation and monitoring include:

- Monitoring of performance measures is undertaken by Team Leaders and reported to Senior management and Cabinet Member on a quarterly basis. Additionally, ad-hoc internal checks are undertaken to monitor progress towards the Business Plan priorities.
- Monitoring of inspections by supervisors and management within each section.
- Monitoring of inspection reports and records.
- Officer reviews are held approx. every 6-9 weeks (FH) or 12 weeks (TS) plus an annual appraisal, which includes a competency assessment for food and feed enforcement as appropriate.
- Accompanied visits and Peer assessments – following internal protocols.

The Food Standards Agency (FSA) has a statutory discretion to undertake audits (full or focused) of food and feed authorities. The most recent full audit was undertaken in 2014, with a follow up visit in August 2016. It is anticipated that an audit will take place in 2025-26.

The FSA additionally require food authorities to submit performance statistics periodically. The annual Local Authority Enforcement Monitoring System (LAEMS) has been retired, and a replacement is being developed. In the meantime, a 6 monthly return is compiled for the FSA.

## 6.0 REVIEW

### 6.1 Review against Service Plan

Strategically, the Head of Service and the Trading Standards, Food & Health Protection Manager have overall responsibility for the direction and performance of the service.

The Trading Standards, Food & Health Protection Manager is the Accountable Manager for the food hygiene, food standards and feed standards & hygiene functions.

The Manager reviews the key performance measures and service improvements contained in the plan on a quarterly basis as part of the performance management process, these are reported internally at quarterly intervals to the Head of Service and Cabinet Member.

#### 6.1.1 Food Hygiene

In addition to the corporate monitoring of performance, regular meetings are held with the food hygiene team (food and health protection). This is to ensure that ongoing projects, improvements, and inspection targets outlined in this service plan and the business plan are effectively monitored and managed.

Achievements for 2024/25 included:

- Staff were able to work flexibly and on an agile basis undertaking all Food Hygiene Category A (High Risk premises) inspections.
- The service continued with an officer Secondment to the Health Protection team (formerly the Regional TTP (Test Trace Protect) team), which provided an ongoing, invaluable service in supporting Care Homes within NPT to understand Health Protection controls (including Covid guidance) issued by Public Health Wales.
- Staff continued to deal with substantial numbers of new food business enterprises, both in giving advice and undertaking inspections.

#### 6.1.2 Food Standards and Feeding stuffs

The pandemic increased an already large backlog of programmed interventions, reactive work continues to be prioritised.

Trading Standards achieved the following in 2024/25:

- Coordinated the feed work of the NPT/Swansea region.
- Began the transition to a new management information system, developing new processes in service delivery along the way.
- Liaised with the National Food Crime Unit as part of the Glamorgan Group in investigating specific instances of cross border food fraud.
- Maintained CPD for food and feed officers.
- Continued to develop new methods of working and surveillance of businesses.

## 6.2 Identification of Variation from the Plan

Variations from the Service Plan will be identified annually along with reasons for the variance and whether or not they are justified.

### Trading Standards: Food Standards & Feed

Trading Standards has a large food intervention backlog. The pandemic exacerbated this problem, further compounded by the staffing problems the service has experienced. Proactive inspections will continue to be subject to the same competition for resources as the other demands on the service's other work and will be prioritised as necessary. From a food and feed perspective the service's focus is on assessing category "A" rated and "Unrated" businesses.

### Food Hygiene

All Category A, B and C risk-rated premises were brought back into alignment with the Code of Practice during 2023/24 (following the FSA/LA "post-Covid" Recovery Plan), however in 2024/25 various staffing vacancies occurred and a small backlog of mainly Category C premises has occurred – this will be addressed in 2025/26. Also, there remains a small backlog of lower risk premises (Category D & E premises). Most new (Unrated) premises were inspected, with a small backlog being rolled forward.

Where prosecutions or extensive investigations are involved, these will inevitably have an effect on workloads. Staffing vacancies or extended absences invariably have implications for achievement of the plan. There remains a risk that if resources are capped, priority and resources will be directed at inspections of higher risk establishments and investigation of 'non-compliant' premises.

## 6.3 Areas for Improvement

Over the past 5 years, the challenges faced by food & feed safety enforcement authorities have been significant. Both services are governed by the priorities set by the Food Standards Agency and the Food & Feed law codes of practice.

Trading Standards are also influenced by the Office of Product Safety & Standards and National Trading Standards (NTS) priorities and workstreams, often leading to conflicting priorities.

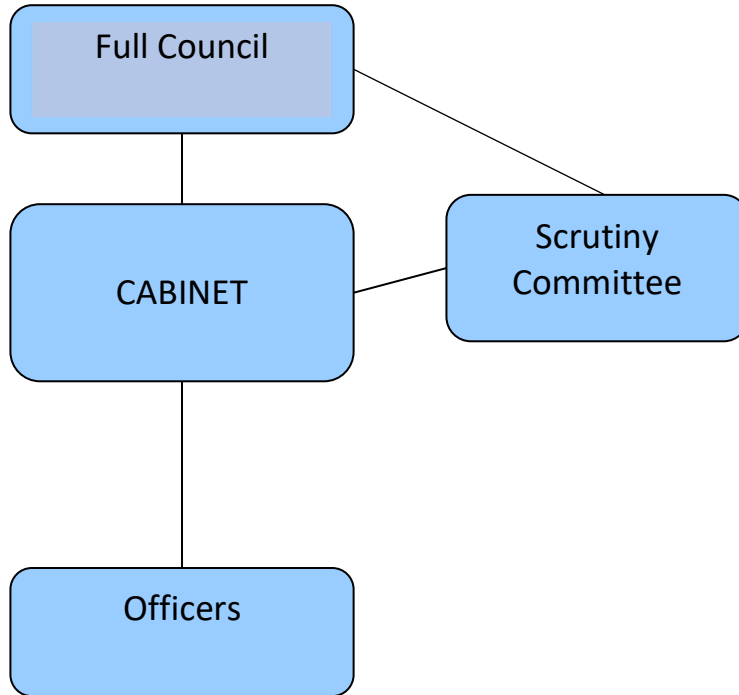
The Food Hygiene service has to have regard to the enduring impact of the final report from the South Wales E. coli O157 public enquiry. However, some of the current planned improvements for 2025/26 and beyond include:

<b>Areas for Improvement</b>	<b>Trading Standards &amp; Animal Health</b>	<b>Food Hygiene &amp; Health Protection</b>
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Reviewing out of hours provision and cover arrangements in relation to outbreaks of communicable disease and food / feed alerts.		•
Developing a training programme for officers involved in the investigation of outbreaks of communicable disease.		•
Undertaking suitable promotional activities / campaigns.	•	•
Consult with stakeholders and establish measures to assess the quality of the service provided.	•	•
Increasing intelligence-led enforcement of food standards and feed; and piloting the new risk assessment scheme for food standards.	•	
Migration from the Civica APP system to Idox Cloud.	•	•
Continue to develop resources for hybrid / agile working including methods of data gathering and recording.	•	•
Continuing to improve the use of alternative enforcement strategies in relation to food and feed inspections.	•	
Responding to the challenges regarding local government financing and organisation.	•	•
Assessing and addressing the demands on the service following EU Exit.	•	•
Addressing the demands on the service from the Food Standards Agency “Achieving Business Compliance” programme.	•	•

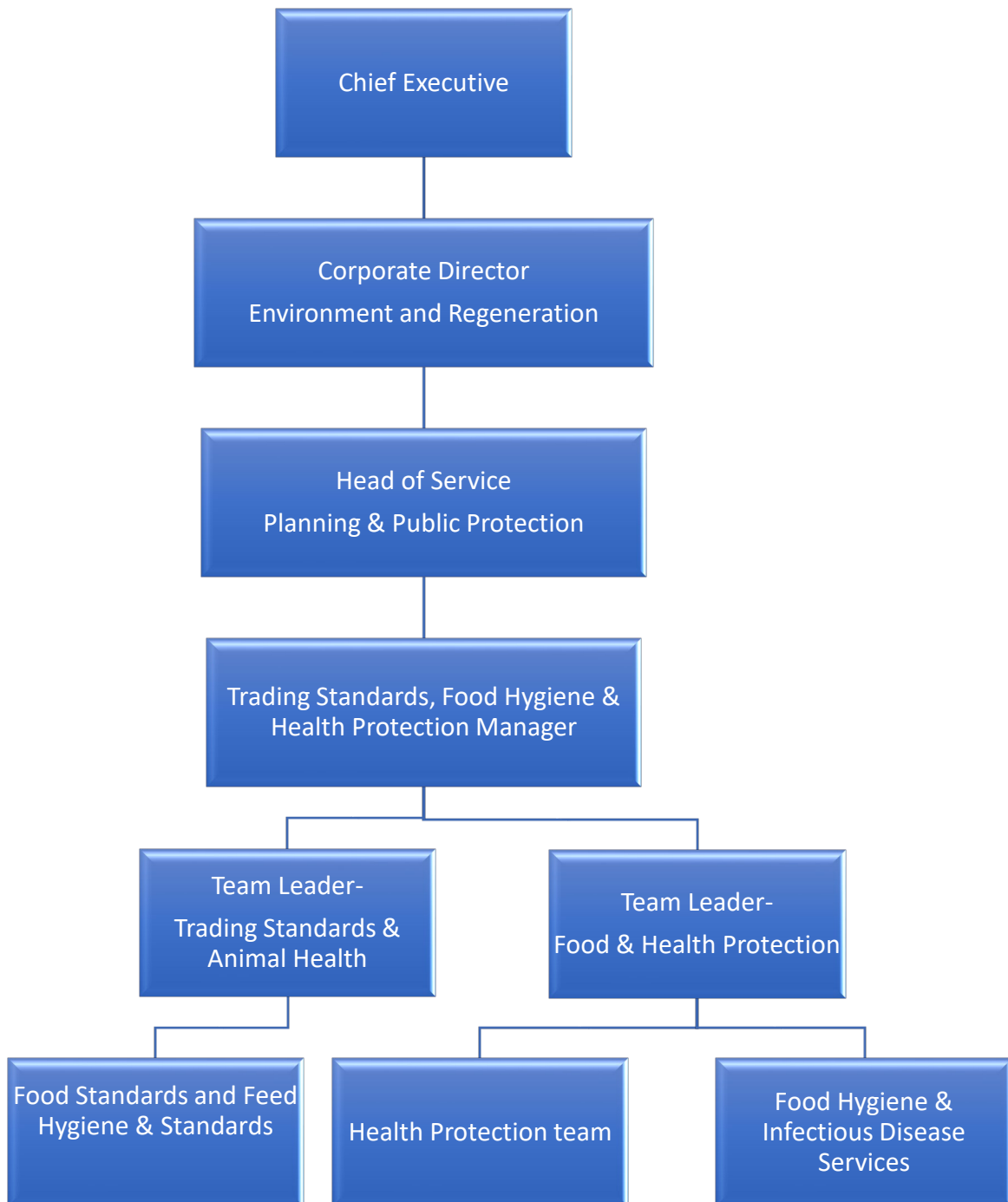
**APPENDIX A**

**Decision Making Structure**



## APPENDIX B

### Department Structure



## APPENDIX C

### Service Structure (officers with food related duties) – as at 1<sup>st</sup> April 2025

