

<b>Title of Report:</b>	<b>SAMPLING POLICY</b>
<b>Committee Report Submitted To:</b>	<b>ENVIRONMENTAL SERVICES COMMITTEE</b>
<b>Date of Meeting:</b>	<b>10<sup>th</sup> December 2019</b>
<b>For Decision or For Information</b>	<b>FOR DECISION</b>

<b>Linkage to Council Strategy (2019-23)</b>	
Strategic Theme	Resilient, Healthy and Engaged Communities
Outcome	Consistent and effective food sampling
Lead Officer	Head of Health & Built Environment

<b>Budgetary Considerations</b>	
Cost of Proposal	N/A
Included in Current Year Estimates	Yes
Capital/Revenue	N/A
Code	N/A
Staffing Costs	N/A

<b>Screening Requirements</b>	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals		
Section 75 Screening	Screening Completed:	Yes	Date: 28.11.19
	EQIA Required and Completed:	No	Date:
Rural Needs Assessment (RNA)	Screening Completed	Yes/No N/A	Date:
	RNA Required and Completed:	Yes/No N/A	Date:
Data Protection Impact Assessment (DPIA)	Screening Completed:	Yes/No N/A	Date:
	DPIA Required and Completed:	Yes/No N/A	Date:

## **Background**

In Northern Ireland the responsibility for the enforcement of food safety and hygiene legislation rests with the Food Standards Agency Northern Ireland (FSA) and the 11 District Councils.

Councils in NI recognise the important contribution food sampling makes to the protection of public health and the food law enforcement functions of District Councils.

Council's Food Sampling Policy has been updated and is intended to guide the Environmental Health Department in developing sampling programmes for the Food Service and to help provide a regional focus for microbiological sampling of foodstuffs and sampling for food standards.

A copy of the updated Food Sampling Policy is attached as Appendix 1

## **Recommendation**

It is recommended that the Food Sampling Policy is adopted.



**Causeway  
Coast & Glens  
Borough Council**

## **FOOD SAMPLING POLICY**

Policy Number	
Version Number	1
Author	NIFMG

Date of Screening of Policy	28 <sup>th</sup> November 2019
EQIA Recommended?	YES/NO
Date Adopted by Council	
Date Policy Revised	

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## APPENDIX

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## **1.0 Introduction**

This policy deals with sampling of food and for both microbiological and food standards.

In Northern Ireland the responsibility for the enforcement of food safety and hygiene legislation rests with the Food Standards Agency Northern Ireland (FSA) and the 11 District Councils.

Councils in NI recognise the important contribution food sampling makes to the protection of public health and the food law enforcement functions of District Councils.

The primary legislation governing food sampling includes The Food Safety (NI) Order 1991 and the Food Law Code of Practice, The Food Hygiene Regulations (NI) 2006, The Official Feed and Food Controls Regulations (NI) 2009 and EC Regulation 2073/2005 and 178/2002 (and associated guidance).

This policy is intended to guide us as we develop sampling programmes as part of our food service plan and to help provide a regional focus for microbiological sampling of foodstuffs and sampling for food standards.

When used as part of a suite of food enforcement measures, food sampling can make a very valuable contribution provided it is targeted; risk based and makes the best use of available resources.

This policy should be read in conjunction with LACORS Guidance on Food Sampling for Microbiological Examination Issue 2 January 2006 and Food Standards Agency document Practical Sampling Guidance for Food Standards and Feeding Stuffs, May 2004.

## **2.0 Aims and Objectives**

This document aims to provide a template for a consistent and effective approach to food sampling within district councils across NI.

The objectives of sampling are to:

- Protect the consumer through enforcement of food hygiene and food standards legislation.
- Verify the effectiveness of a food business's Food Safety Management System. Evaluating temperature control, food handling and processing practices.
- Give advice and guidance, if appropriate, on food hygiene and food standards matters.

- Assess the quality of food manufactured, distributed or retailed in Causeway Coast and Glens Council area
- Ensure imported food complies with relevant food legislation.
- Giving customers sufficient information to make informed choices
- Detect fraudulent activities
- Ensure consistent and proportionate follow up action is taken upon receipt of sampling results in line with the council's enforcement policy.

### **3.0 Setting the Sampling Programme**

Issues to be considered when devising a sampling plan could include:

- Size and health of the population – (outbreak investigation issues)
- Profile of the food industry in NI
- National & regional surveys
- Known food safety/hygiene and food standards issues
- Outbreaks and sporadic incidents of food borne illness
- Laboratory provision
- Available resources

Taking these in turn:

#### **3.1 Size and Health of the Population**

It is estimated that the NI population is approximately 1.88 million (NISRA estimates 2018). Annual mortality rates can be obtained on the NISRA website at [www.nisra.gov.uk](http://www.nisra.gov.uk)

#### **3.2 Profile of the Food Industry in NI**

There are a total of 21650 food establishments in NI (2017/18 FSA return), they are broken down into the following categories:

Primary Producers	106 (0.5%)
Manufacturers and Packers	1252 (5.8%)
Importers and Exporters	49 (0.2%)
Distribution and Transporters	432 (2%)
Retailers	4030 (16.6%)
Restaurants and other Caterers	15781 (72.9%)

While manufacturers only account for 5.8% of food businesses, consideration should be given to the volume and type of food they produce, the size and extent of their markets and also consideration given to the operation of the

Home Authority Principle and where appropriate the Primary Authority Scheme (PA).

The FSA's Strategic Plan 2015-2020 identifies the key strategic outcomes as:

- Food is safe
- Food is what it says it is
- Consumers can make informed choices about what to eat
- Consumers have access to affordable health food, now and in the future

Sampling therefore plays an important role in ensuring that these strategic outcomes are met.

### **3.3 Regional and National Surveys**

Northern Ireland Food Manager Group (NIFMG) working groups meet with the Public Health Laboratory representatives and Public Analyst to discuss arising issues and priorities in the coming year with respect to food hygiene and standards matters. Regional surveys from Public Health England or the FSA are also coordinated through the working groups.

Imported food contributes 50% of all the food consumed in the UK, the FSA have asked inland authorities to consider sampling imported foods as part of their routine programmes. This would give some assurance of the safety and quality of food entering the country. Although it is possible to plan for most of an authority's samples, there are circumstances that require additional sampling or a change in priorities such as consumer complaints, Food Alerts or RASFFs. We are aware of the need to instigate contingency arrangements should the need arise.

### **3.4 Known Food Safety/Hygiene Issues**

District Councils may collectively or individually consider initiatives based on local needs and experience to deal with known or recurring issues.

Historically, problems have been identified with substitution in meat products and preparations (meat content, labelling etc) substitution of spirits, high salt levels in locally produced foods (including breads), allergen declaration, quid labelling and misrepresentation and more recently presence of undeclared meat species.

### **3.5 Outbreaks and sporadic incidents of food borne illness**

The nature of food poisoning outbreaks mean that it is very difficult to develop a plan to deal with outbreaks in terms of resourcing. It is understood that each investigation will take priority over other sampling programmes.

### **3.6 Laboratory Provision**

#### **Appointed Public Analyst:**

Public Analyst Scientific Services Limited  
i54 Business Park  
Valiant Way  
Wolverhampton  
WV9 5GB

Telephone number-0845 6009004

#### **Food Examiner**

Belfast City Hospital  
Public Health Laboratory  
Belfast Health & Social Care Trust  
Lisburn Road  
Belfast  
BT9 7AD

Tel: 028 9026 3588

### **3.7 Available Resources**

Councils are under increasing financial pressures but it is important that sample budgets are not cut. In order to protect these budgets Causeway Coast and Glens Borough Council must ensure that samples are targeted to make best use of the available resources and to ensure that the consumer is protected. There is currently no cost for micro sampling.

Traditionally a level of 1.5 samples per 1000 population are procured for chemical analysis. In Causeway Coast and Glens Borough Council this equates to 216 chemical samples per year. The number of samples may be increased if and when the need arises for example, to facilitate investigations and detection of any food fraud incidents.



## **4.0 Types of Samples**

There are two categories of food samples:

### **4.1 Informal Sampling**

Informal samples should be taken in the following circumstances:

- Sampling is not likely to result in formal action being taken.
- Sampling is for monitoring purposes where there is no legislative aspect.
- Sampling is for background surveillance and compliance levels.
- Sampling is to provide advice to businesses regarding hygiene matters.
- Sampling for nutritional analysis against non-legislative standards e.g. FSA salt targets for certain food

### **4.2 Formal Sampling**

Formal samples should be taken in the following circumstances:

- As a follow-up to a 'Potentially injurious to human health/or unfit for human consumption' sample result
- As part of the investigation of a confirmed food poisoning outbreak
- As part of the investigation of an alleged food poisoning outbreak where there is sufficient evidence/suspicion of an offence
- Where an Officer believes samples results may be required to form evidence for legal proceedings

In all circumstances the officer should discuss the need for formal samples with their line manager. Formal samples must only be taken by officers authorised to do so.

The documents listed at Appendix 1 should be read and considered in detail regarding sampling policies, sampling programmes, preparation and equipment for sampling, sampling approaches and methods.

## **5.0 Imported Food**

Samples of imported foods should account for a minimum of 10% of the total number of samples taken annually in Northern Ireland. In Causeway Coast and Glens Borough Council we will aim towards this figure where appropriate and relevant sampling is identified.

## **6.0 Surveys**

It is the intention of the council to participate where there is an apparent public health benefit in food surveillance programmes which are co-ordinated by the following bodies, as part of programmed sampling.

- FSA Surveillance Programmes
- Health Protection Agency
- NIFMG Sub groups
- Public Analyst Scientific Services

## **7.0 Reporting of Samples**

Results of microbiological and food standards samples should be reported in a timely manner and where appropriate in writing to the Food Business Operator and other interested parties e.g. the manufacturer / Home Authority.

## **8.0 Publication of Sampling Policies**

The Food Law Code of Practice requires the council to publish food sampling policies.

## APPENDIX 1

### Microbiological Sampling

- LACORS Guidance on Food Sampling for Microbiological Examination, Issue 2 January 2006




G-FC-GUD-066.pdf

- HPA How to pack a cool box - Food, Water & Environmental Microbiology Network



G-FC-GUD-147.pdf

- CCFRA Guideline No. 36 'Guidelines for the Preservation of Official Samples for Analysis'
  - FSA Food Law Code of Practice  
<https://signin.riams.org/connect/revision/y1lqq/Environmental-Health/Food-Law-Code-of-Practice-NI>
  - FSA Food Law Practice Guidance  
<https://signin.riams.org/connect/revision/awswc/Environmental-Health/Food-Law-COP-Guidance-NI>
  - Follow up on Microbiological Sample Results
  - Formal Sampling Flowchart
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- G-FC-GUD-014.pdf
- HPA Guidelines for Assessing the Microbiological Safety of Ready-to-Eat Foods Placed on the Market -  
<https://www.gov.uk/government/publications/ready-to-eat-foods-microbiological-safety-assessment-guidelines>

### Food Standards Sampling

- FSA Practical Sampling Guidance for Food Standards & Feeding Stuffs Part 1: Overall Objectives of Sampling. May 2004 Version 1
- FSA Practical Sampling Guidance for Food Standards & Feeding Stuffs Part 2: Food Standards Sampling. May 2004 Version 1
- Guidance note for sampling food and feed to determine the presence of genetically modified (GM) material, FSA NI, December 2007 -  
<https://fsa.riams.org/resource/files/225>

- FSA Food Law Code of Practice  
(<https://signin.riams.org/connect/revision/y1lqq/Environmental-Health/Food-Law-Code-of-Practice-NI> )
- FSA Food Law Practice Guidance  
(<https://signin.riams.org/connect/revision/awswc/Environmental-Health/Food-Law-COP-Guidance-NI> )
- NIFLG Procedures for Taking Formal Chemical Samples



G-FC-GUD-072.pdf

- Follow up on Chemical Sample Results