

## Appendix 3

### **BELFAST CITY COUNCIL CITY & NEIGHBOURHOOD SERVICES DEPARTMENT SERVICE PLAN FOR FOOD LAW ENFORCEMENT 2023 - 2024**

This service plan for food law enforcement describes the balance of techniques and approaches to be taken by Belfast City Council during 2023 - 2024 to ensure food safety, food standards and promote informed healthy choices. The Council will mix and balance the four common approaches to enforcement:

- Demand driven
- Education driven
- Inspection driven
- Intelligence driven

Food safety is a priority for the Council's regulatory service, with staff in Food Safety, Port Health and Business Support providing most aspects of the service.

#### **1 – Service Aims and Objectives**

##### **1.1 Aims and objectives**

The key aims and objectives of the food service are to:

1. Protect consumers and ensure food produced, imported through or sold in Belfast is safe to eat and meets the necessary legal standards
2. Support the local economy, including the regeneration and investment in the City Centre by minimising the cost of food related illness and supporting individual businesses through clear advice, guidance and good regulation which are effective, risk based and proportionate.
3. Respond to all complaints or service requests within target response times and meet the needs of local people through effective delivery of quality and customer centric services.
4. Help consumers and businesses understand about safe food and healthy eating and help to ensure that consumers have the information they need to make informed choices whilst promoting food sustainability and helping to reduce food poverty.

##### **1.2 Links to corporate objectives and plans**

Belfast City Council published its first community plan, The Belfast Agenda in 2017, setting out a new vision for Belfast to become a City which will drive a successful economy, a magnet for investment and a great place to live for everyone. An updated Belfast Agenda is due to be published for consultation soon.

The Food Safety Service has an important contribution to make to the achievement of the city's priorities, particularly by supporting the economy and creating a safe city. The service also helps the Council in its efforts to stimulate the local economy, supporting other key strategies including the Bolder Vision for Belfast which aims to create a more attractive, accessible, safe and vibrant city.

In promoting food safety and healthy choices the Food Safety Service also contributes to delivering the cross-government food strategy, published in June 2022, setting out a joint vision for the UK food system in 2030 and the Food Standards Agency's Strategy for 2022-2027.

The Service, by improving food safety in the City, plays an important role in promoting Belfast to visitors and tourists. This has become more visible since the Food Hygiene Rating Act (NI) 2016 came into operation in October 2016 requiring all relevant food businesses to display their ratings (display was previously voluntary, with only 57% of businesses displaying their rating). The implementation and enforcement of this legislation requires considerable resources.

## **2. Background**

### **2.1 Profile of the Local Authority**

The Council is the largest of the 11 Councils in Northern Ireland and, by any definition, is an organisation of size, importance and structure. It now serves a population of 345,000 (with a daytime population of over 400,000). The area is predominantly urban in nature with the Council offices being located in the city centre. The city is the major centre for both employment and entertainment in Northern Ireland with two thirds of the population of Northern Ireland being within 50 km of the city.

Within the city boundary is the Port of Belfast, Ireland's busiest port and a significant port within the United Kingdom. The area of the Port consists of 1,000 acres of water 2,000 acres of land and over 8,000 linear metres of quays. Around two thirds of Northern Ireland's seaborne trade, and a quarter of that for Ireland as a whole, is handled at the port. More than 2.3 million Tonnes of liquid bulk products are handled at Belfast Harbour annually.

### **2.2 Organisational Structure**

Following local government reform in April 2015 and the additional powers and responsibilities of the new Council, the organisation has and continues to undergo substantial redesign. This has included new committee structures and restructuring of the various departments. Each Department reports to and discharges the functions of one or more Council Committees.

The City & Neighbourhood Services Department reports to the People & Communities Committee and comprises of over 1,400 staff. The CNS Department brings together many front-line functions that provide services directly to ratepayers across the city, including food safety and port health, as well as other environmental health functions.

Within the Food Safety team, there are currently four Officers (1 Assistant City Protection Manager and 3 Senior EHOs) designated as lead food officers; 1 for Food Hygiene, 1 for Food Standards and two for Port Health, who have responsibility for the delivery of this Service Plan for Food Law Enforcement. A pool of suitably qualified and authorised Environmental Health Officers and technical officers are employed by the Council, and are allocated to duties across the EH functions, and allocation of staff to each of those functions can be quickly adjusted, should the need arise. The Unit has established an area-based service delivery system.

The Northern Ireland Public Health Laboratory based at Belfast City Hospital, provides specialist services in food microbiology and pathology. The Council has appointed Eurofins Food Testing Ireland Ltd as Public Analysts to provide specialist analysis and advice on food composition, labelling and chemical and physical contaminants of food. The Agri-Food and Biosciences Institute at Newforge Lane, Belfast, is employed for the identification of pests associated with food and food premises.

## **2.3 Scope of the Food Service**

Belfast City Council carries out all functions relating to food safety and food standards matters, including the following:

- Registration and approval of food premises
- Inspection of food premises including manufacturing, catering and retail premises in accordance with a range of legislation and guidance, and taking into consideration the Council's Regulation and Enforcement Policy
- Implementation of the national Food Hygiene Rating Scheme including publication of food hygiene inspection results on the national website
- Dealing with potential food hazards including food alerts
- Inspection of foodstuffs and the formulation and implementation of sampling programmes for analysis in relation to composition and labelling and/or microbiological examination.
- Investigation of complaints relating to food and hygiene of food premises and investigation of cases of suspected food poisoning
- Providing advice and information on food safety matters
- The provision of specialist food safety education programmes, and signposting to other commercially available training services
- Food safety and nutrition promotional activities, including participation in National Food Safety Week, and the development and promotion of actions to improve nutrition & health and reduce food poverty
- Provision of practical food safety and port health training to environmental health students
- Investigation of incidents of statutorily notifiable food and water related illnesses on behalf of the Director of Public Health of the Public Health Agency
- Inspection of third country (non-EU) imported food of non-animal origin
- In partnership with the Department of Agriculture, Environment and Rural Affairs the operation of the Port of Belfast Border Inspection Post and the inspection of Products of Animal Origin.
- Enhanced screening of Maritime Declaration of Health documents for all vessels arriving in Belfast.
- Inspection of vessels (ships – including passenger ferries) arriving at the Port to ensure compliance with International and United Kingdom health and hygiene requirements including food safety and control of infectious diseases and to issue Ship Sanitation Certificates as required.
- Enforcement of legislation relating to import control of Organic products
- Enforcement of legislation to control illegal, unregulated and unreported fishing in order to ensure food safety and protect marine ecosystems
- The issuing of attestations and export health certificates required for the export of consignments of non-animal foods and fish from NI to third countries

The service is currently provided by members of staff employed by Belfast City Council. All staff involved in the inspection of food and food premises meet the qualification and competency requirements of the Food Law Code of Practice and the FSA competency framework.

## **2.4 Demands on the Food Service**

### **2.4.1. Food Safety Service**

Belfast City Council has 3606 food businesses within the City.

A profile of premises classified in accordance with the FSA monitoring returns are given below.

TYPE OF ESTABLISHMENT	NO. OF PREMISES
Primary Producers	8
Slaughterhouses	0
Manufacturers & Packers	168
Importers/Exporters	40 (includes Import Agents)
Distributors/Transporters	76
Retailers	723
Restaurant/Caterers	2590
Unrated premises awaiting first inspection on 1 <sup>st</sup> April 2023	87

100 premises are considered outside the inspection programme however officers are still required to assess the food safety risks associated with these types of premises and investigate complaints. These are for example head offices with no physical food presence but who have responsibility for food safety matters; market stalls or mobile vendors who are registered and risk rated by another local authority and events.

11 manufacturing premises and 5 cold stores in the city are approved under EC Reg 853/2004.

The majority of food premises in the city are caterers or retailers reflecting the fact that Belfast is a major regional centre for shopping, entertainment, business and tourism. However, within the City there are a number of major manufacturers including 2 major bakeries, 2 flour mills, 5 cold stores, 5 meat preparations and other meat products premises, an animal fat rendering plant, and 5 fish processors approved under EC Regulations which manufacture and process food for distribution throughout Northern Ireland and Great Britain and export to the Republic of Ireland.

An External Temporary Storage Facility (ETSF formerly known as Enhanced Remote Transit Shed – ERTS) is a warehouse designated by HM Revenue and Customs (HMRC), where goods are temporarily stored pending clearance by HMRC, and prior to release into free circulation. ETSFs are periodically examined to ascertain if foods are stored.

As shown above there are a large number of distribution centres located in the city many of which distribute across Northern Ireland and the Republic of Ireland. Seven of these premises specialise in ethnic foods of non-EU origin and are monitored to ensure imported food controls are being adhered to.

It is estimated that over 5% of Belfast's food businesses, across a range of business types, are owned by people whose first language is not English. These food business operators have traditionally been Asian, however in recent times there has been an increase of people from Eastern European and African countries. Whilst this adds significantly to diversity and

customer choice, it requires particular effort from the service to ensure equal access to advice and information, including the facility for the translation of documents and provision of interpreters for on-site visits and meetings.

The Council's food safety services are delivered from the Cecil Ward Building, 4-10 Linenhall Street, Belfast, usually between the hours of 0830 and 1700, Monday to Thursday, and between 0830 and 1630 on Fridays. The Port Health services are delivered from the Port Health Unit at Corry Place, Belfast Harbour Estate, delivering the import food control service on a 24 hour, 7 days a week basis.

Out of hours work is undertaken as necessary, such as for businesses that only open late at night and/or at weekends and for additional Port health work such as ship inspections.

An Environmental Health Officer is on standby outside normal office hours, to deal with urgent notifications from the FSA and also infectious disease incidents at the discretion of the Public Health Agency (PHA). A Port Health Officer is on standby out of office hours to deal with issues arising in the Port. This service extends 24 hours per day for 365 days per year.

Historically there has been a continued increase in the number of large outdoor events which have significant catering facilities associated with them, such as farmers' and continental markets, festivals and concerts. These events often require evening, weekend and Bank Holiday visits to monitor food hygiene standards. We will continue to strengthen relationships with promoters and organisers this year in order to ensure that adequate attention is given to planning for food safety. Significant events this year include the Christmas Continental Market, St Patricks Day, Feile, Orangefest, and Belsonic music festivals, among others.

#### **2.4.2. Port Health Service**

In late 2020, the Port Health service established a 24-hour service to deliver the additional responsibilities resulting from the UK's exit from the EU for imported food checks on some foods arriving from UK. This new service became operational from 31<sup>st</sup> December 2020 operating a shift working model, with an anticipated review of structures once final NI Protocol arrangements to take place once the final NI protocol arrangements became clear. Throughout 2021 and 2022, ongoing UK/EU discussions on these arrangements continued, with the service continuing to operate delivering our responsibilities in line with initial grace periods. Recruitment and retention challenges throughout 2021 did however prompt an interim review of the staffing resource in 2022, resulting in creation of a new Port Health Support Assistant role, to reduce reliance on Environmental Health Officers.

The shift-based resource above is in addition to a pre-existing small team of 4 daytime officers based at Port Health who primarily deliver services for imported food controls for goods arriving from other 3<sup>rd</sup> countries, ship sanitation inspections, other Port Health infectious disease duties, public health nuisances and some food hygiene work within the Port.

Further review of the staffing resource and structure will be required once the final policy and practical implementation requirements for delivery of the statutory duties imposed on the Council by the Windsor Framework (published in February 2023) are clarified over the coming months. An appropriate and sustainable longer term service model, including sustainable financing arrangements is required and we continue to advocate for this with key partners, including FSA, DAERA and DEFRA.

The Port Health Unit is currently located in office and inspection facilities within the harbour estate. These facilities were approved in January 2010 by the Food Standards Agency on

behalf of the European Union as a Designated Point of Entry into the EU for the carrying out of official controls on high-risk products of non-animal origin imported from outside the EU. The facility is also approved as a Border Inspection Post for the examination, sampling and clearance of third country imports of products of animal origin and is operated by the Council in conjunction with DAERA (Department of Agriculture, Environment and Rural Affairs). It is also approved as a First Point of Introduction for certain food contact materials. Whilst the Corry Place facility was sufficient for the Council's service requirements up until December 2020, following introduction of the NI Protocol, capacity limitations at the facility mean that delivery of increased inspection workloads will require additional purpose-built inspection accommodation in the future. DAERA and DEFRA are working to plan and develop the new purpose-built inspection facilities, however this is not expected to be completed until mid-2025 at the earliest.

## **2.5 Enforcement Policy**

The Council has prepared a Regulation and Enforcement Policy which was formally adopted by the Council in December 2011. The purpose of this policy is to secure an efficient and effective approach to all regulatory and enforcement activities carried out by Belfast City Council. The policy is consistent with the principles set out in the Government's Better Regulation Agenda and with the principles of the Enforcement Concordat and it is also intended to improve compliance with legislation while minimising the burden on businesses, individuals, organisations and the Council. The policy sets out the principles which will enable the Service to ensure consistent and open enforcement and is considered when determining appropriate enforcement action. Management controls are in place to ensure that all decisions on enforcement are consistent with this policy.

In preparing the Policy, the Council has considered the Regulator's Compliance Code and the "Statement of Intent" between the Local Better Regulation Office, the Department of Enterprise Trade and Investment, and District Councils.

The Regulation and Enforcement Policy is available on the Council's website and can be accessed at [www.belfastcity.gov.uk](http://www.belfastcity.gov.uk). Businesses are advised of the existence of the policy together with how it can be obtained on all standard letters and reports left following the inspection of premises.

This general policy is supported by unit specific guidance and procedures.

The Council maintains its own Legal Services to provide support to service Departments.

## **3. Service Delivery**

### **3.1 Food Premises Interventions**

The Council plans and delivers a risk-based Food Premises Intervention Programme based on the requirements of the Food Law Code of Practice. The frequency and type of intervention planned aims to concentrate resources on the worst offenders and higher risk businesses whilst at the same time reducing the burden on the better businesses.

The Council recognises the importance of a robust intervention programme and will thoroughly inspect all businesses that are higher risk or have poorer compliance levels.

As in previous years the Council will use a “light touch” Alternative Enforcement Strategy for the very low risk premises that are not included within the Food Hygiene Rating Scheme. This strategy will negate the need for intervention in many of these premises. Examples of these type of premises are childminders and chemists.

There are a total of 2326 premises due a food hygiene intervention and 992 premises due a food standards intervention in 2023-2024. This is an increase on the previous year’s programme and is largely due to the cessation of programmed inspections during the Covid 19 pandemic. Staff resources continued to be affected during the 2022/2023 year with the challenges in recruiting suitably qualified staff. Local authorities across the UK are experiencing difficulties recruiting environmental health officers into local government and in particular to food safety sections - additional monitoring and auditing requirements of the FSA and the complex competency framework that food officers are required to attain in order to practice, often makes this more difficult.

### 3.2 Food Hygiene Intervention Strategy

As per the Food Law Code of Practice the following premises have been prioritised for inspection in 2023-2024:

Risk category	Inspection planned
A	5
B	134
C	472
D	1019
E	623
Unrated	87

The unit currently has one industrial placement students who is assisting in the completion of the alternative enforcement strategy.

### 3.3 Food Standards Intervention Strategy

Food standards interventions aim to ensure that food sold throughout the city complies with relevant compositional and labelling requirements, is properly described and of sound quality. In general food standards inspections are carried out during the same visit to premises to conduct a food hygiene inspection where they fall due within the same timeframe. However, for higher risk premises such as Category A, Approved Premises, Manufacturers and Distributors and some other Category B premises, the standards inspections may be carried out separately in order to facilitate focused attention on food standards.

As per the Food law code of practice the following premises have been prioritised for inspection in 2023-2024:

Risk category	Inspection planned
A	15
B	140
C	761
Unrated	87

A priority area for the majority of these premises will be to assess provision of Allergen Information including where necessary provision of correct Pre-Packed for Direct Sale Allergen and Mandatory Information through the use of the PPDS checklist. A substantial number of these interventions shall be completed while officers are on-site for a Hygiene inspection, thereby utilising resources to maximum efficiency.

### **3.4 Alternative Enforcement Strategy (AES)**

Normally those food businesses which present the lowest risk to public health will be subject to an alternative approach to inspection. This AES consists of a Food Safety Hygiene and Standards Self-Assessment Questionnaire which is posted out to the businesses along with tailored advice and information. Completed questionnaires are reviewed to monitor compliance and confirm that there have been no significant changes to the business or a change in ownership. Premises that do not provide the necessary information or indicate a significant change to their activities will be subject to an inspection.

The Unit has currently identified 540 premises who present the lowest risk for Food Hygiene Category E and for Food Standards Category C, which will be subject to Alternative Enforcement Strategy for 2023-24.

### **3.5 New food standards and hygiene delivery models**

Following a consultation exercise in 22/23 the FSA are introducing a new system for risk rating premises that are subject to programmed food standards inspections. In 23/24 a similar consultation exercise is taking place with regard to a new delivery model for food hygiene inspections. These new delivery models aim to enable District Councils to deploy resources more effectively as the proposed risk rating matrices will enable focus on the highest risk and/or non-compliant businesses. Food Safety Officers within Belfast City Council have expressed support for the new schemes but are aware that there are implications for the unit, particularly with regard to the initial work for migration from the current risk rating scheme and the associated IT solutions that will require significant adaptations.

### **3.6 Allergens**

A significant change to the labelling requirements for PPDS foods came into force on 1 October 2021. Prior to the introduction of the new requirements additional support including advisory visits, leaflets, webinars etc. was offered to businesses to help them achieve compliance. We will continue to offer support throughout this year as businesses become familiar with these requirements and escalate to formal action where appropriate. We shall utilise the NI Food Manager Group PPDS checklist where appropriate to target specific advice to key businesses.

### **3.7 Revisits**

In line with the statutory Food Law Code of Practice all food businesses that fail to comply with significant statutory requirements shall be subject to appropriate enforcement action and revisit to verify compliance. As a minimum they will receive a written warning letter.

However, officers will aim to utilise the wide range of enforcement options available to ensure compliance is achieved in a timely fashion. We shall make appropriate use of all enforcement options which continue to apply to all food businesses, and in accordance with the Council's Regulatory and Enforcement Policy.

For food hygiene a single compliance score of 15 (or higher) is considered significant.



For food standards a compliance score of 40 and/or a confidence in management score of 30 is considered significant.

For lower scores remedial action to secure compliance may be detailed on the post inspection report form and compliance will be verified at next routine visit, however, written warnings shall be issued where it is appropriate to do so, and more formal enforcement options will be considered for persistent non-compliance.

### **3.8 Revisits for FHRS rerating**

Under the requirements of the Food Hygiene Rating Act (NI) 2016 additional revisits will be carried out on request to 're-rate' an establishment, subject to criteria being met and a fee of £150 being paid.

### **3.9 Food Complaints**

The Council will commence the investigation of all food complaints received from members of the public or food businesses within three working days of receipt. In the case of urgent investigations, we endeavour to make contact within the same working day. Officers will investigate complaints in accordance with the requirements of the Northern Ireland Food Managers Group (NIFMG) Food Complaints Investigation Procedure and where necessary the Council will liaise with Originating, Home Authorities and Primary Authorities during the course of its investigation. In determining the appropriate course of action, the Council will take into consideration any reports received from the Home, Originating or Primary Authorities and the food business identified as the cause of the complaint and will have regard to the Council's Regulatory and Enforcement Policy. For 2023/24 the Council estimates that it will receive approximately 600 complaints relating to food or the hygiene of food premises.

### **3.10 Home Authority Principle**

Although not a legal requirement in NI, the Council supports the UK Home Authority Principle and, where appropriate, will liaise with the Home Authority of a business trading in the city, on enforcement and other issues which affect the policies of the enterprise. We will take cognisance of any relevant advice given by the Home or Primary Authority, including any published intervention plan.

While the Council does not enter into formal written home authority partnerships with any business, it has established a close liaison with the majority of businesses, including the Education Authority, for whom it informally acts as a Home Authority on behalf of the other 11 District Councils. Our remit extends to providing advice, guidance and the follow up of non-compliances in relation to policy or procedures identified by our own officers or by officers from the other District Councils. Advice is also provided during programmed inspections and other visits.

On request the Council will investigate all matters referred to it by other local authorities and where appropriate will provide a written response to requests for information. For 2023/2024 the Council estimates that it will receive over 150 requests for information from other Local Authorities.

Where appropriate the Food Safety and Port Health Unit will have cognisance of the contents of the "Statement of Intent" agreed between District Councils, DETI and the Better Regulation Delivery Office (Formally LBRO) for the purposes of providing better regulation of businesses.

The Council liaise closely with the Department of Agriculture Environment and Rural Affairs (DAERA) and carry out work on their behalf under a number of MOU's and SLA's. This includes work relating to egg, beef and poultry meat labelling and traceability and the issuing of export health certificates and attestations for trade to non-EC countries.

### **3.11 Advice to Business**

The Council is committed to the improvement of standards in food businesses and advice to businesses is an important dimension of that strategy. Advice is given through site-visits, provision of compliance tools such as the Butchers' HACCP Pack, and the Safe Catering (HACCP) Pack, the Council's website, dealing with enquiries and requests for advice, through correspondence, meetings with trade groups, distribution of printed materials, and educational and training programmes. The service will continue to support all businesses with the implementation and maintenance of Food Safety Management Systems based on HACCP principles, in conjunction with a graduated approach to enforcement.

In order to promote a positive image and promote the reputation of the Council the unit plans to publish at least one article in City matters.

The Food Safety Unit accepts plans and specifications for all new and refurbished food businesses for review and comment. This approach is taken to help businesses secure compliance before they open thus saving the business and the Council resources by avoiding the need to carry out remedial works. It is estimated that 400 new businesses will receive advice in the year.

Our system of recording service requests, response times and actions help plan, improve and monitor this part of the service. It is estimated that in addition to complaints relating to food or premises a further 1500 requests for service will be received this year. There has been a significant increase in such requests over the past year, particularly for information on food safety requirements as existing food businesses attempt to diversify and others want to operate a food business from their own home.

The Port Health Service is an active member of the local shipping community having extensive business contacts with the Maritime Coastguard Agency, Belfast Harbour Commissioners, N.I. importers, customs, clearance agents, hauliers, shipping companies, ferry operators and stevedores. Advice is given on Port Health related matters, including food safety, to the shipping community on a regular basis and when requested help and advice is given to local importers and members of the general public on the importation of third country foodstuffs including products of animal origin. The Port Health service has also engaged together with DAERA, FSA and other Councils with trade and businesses to provide advice and assistance in relation to additional requirements following Brexit, and the service continues to receive requests for information and advice in this regard.

### **3.12 Food Inspection and Sampling**

The Food Safety Unit has prepared a Food Sampling Policy outlining its general approach to chemical and microbiological sampling as well its approach in specific situations. This approach recognises the important role of sampling in protecting public health and product quality, detecting fraudulent activities and unhygienic practices and to ensure that food standards are maintained.

Food sampling programmes are produced annually for both chemical and microbiological samples, after consultation with the Public Analyst and the Food Examiner. The programmes are produced in accordance with documented procedures, are risk based and prioritised to

focus on foods that are manufactured in the city where there are Home/Originating Authority responsibilities. The programmes also consider the type and risk category of food businesses and imported food. The programme has regard to national, regional and local co-ordinated sampling surveys.

Several areas of intelligence are used to identify priority premises, food products or specific analyses in addition to those collated from the food safety database. Such intelligence may include Incident reports sent to FSA, Food Alerts, FSA Annual Incident report, RASFFs, Food standards complaints; UK Food Surveillance System annual reports, FSA Imported Food Annual Reports & Food Fraud Database bulletins.

In previous years approximately 400 samples were procured for chemical analysis and 1200 samples for microbiological examination. During the Covid 19 Pandemic sampling activities were restricted but the unit is now working to achieve pre-pandemic levels and in 2022/2023 we sampled 279 products for chemical analysis and 905 products for microbiological examination.

### **3.13 Port Health – Imported food inspections and sampling**

The Unit receives up to 15 shipping manifests per day and from these are able to identify vessels and their cargoes. This includes both containerised shipping cargoes, and also all freight entering Belfast Port via roll on-roll off ferry services (up to 77 ferry sailing arrivals at Belfast Port each week). Cargo manifests are scrutinised, and all third country imported foodstuffs are identified. Additional surveillance of manifests to identify non-compliant loads has also increased following introduction of the NI Protocol.

Documentary, identity and physical checks, including sampling, are carried out on all third country products of animal origin in accordance with the EC veterinary checks regime. Following introduction of the NI Protocol, this has extended to relevant food products arriving from GB, however the number of samples of these products has initially been small – a sampling plan for these products is being put in place and this activity is expected to increase over the coming months. Physical inspections on products arriving from GB have also been constrained in 2021/22 due limitations in the inspection facility at Corry Place, and also staffing recruitment and retention challenges.

EU legislation requires that specified import conditions will apply to certain imported consignments of third country products of non-animal origin. These products all require a documentary check, and a proportion will be subject to identity and physical checks (including sampling) at a level laid down in the legislation. Products not subject to the specific legislation will be risk assessed and appropriate checks, including sampling, carried out to ensure compliance with relevant imported food legislation. When possible, the Unit carries out imported food sampling programmes devised by the Food Standards Agency or the E.U.

A sampling plan for this year is yet to be agreed with the Food Standards Agency however we anticipate the numbers of samples to be taken from imported food consignments in 2023/2024 will be in the region of:

- Microbiological 45
- Chemical 250

The International Health Regulations (2005) require that all ships must be inspected at an authorised port such as Belfast and where necessary a Ship Sanitation Certificate issued for the prevention and control of public health risks. The unit also responds to Ship Sanitation inspection requests from ships that operate out of Larne Port. Certificates are valid for a

period of 6 months. As the number of inspections are dependent upon requests from Ships Agents, the volume of inspections vary each year. In 2022/23 we carried out 73 ship sanitation inspections, which was a reduction from 108 inspections in 2021/22. As we continue to emerge from the pandemic it is anticipated that this may increase.

Food hygiene and food standards inspections of Passenger Ferries registered with and operating out of Belfast are undertaken. Some of these ferries are large food businesses producing up to 7500 meals per day. We will inspect between 2 and 4 ferries in 2023-2024.

The unit also regularly inspect External Temporary Storage Facilities (formerly known as ERTS), fishing vessels operating out of Belfast and other vessels in dry dock for repair. Food Hygiene and Standards inspections are also carried out at George Best City Airport as well as ensuring the safety of water delivered to aircraft.

### **3.14 Control and Investigation of Outbreaks and Food Related and other Infectious Disease**

The Council will attempt to investigate all notifications of infectious disease received from the Public Health Agency (PHA), within one working day of receipt. Specifically trained and competent environmental health officers within the Food Safety and Port Health Unit are authorised by the PHA for the investigation of notifications.

Investigation of outbreaks of food related infectious disease is conducted in liaison with the Consultant in Public Health Medicine of the PHA, and in accordance with the existing Outbreak Control Plans and protocols.

The Council estimates that it will receive 120 notifications of food related infectious disease during the year, with an additional 120 alleged food poisoning complaints from the public.

The Port Health Division will respond immediately it is notified of any complaint or incident of food poisoning or food related infectious disease occurring on board a ship or premises within the Port of Belfast or relating to a passenger using Belfast City Airport.

### **3.15 Food Safety Incidents**

The FSA receives and issues information about foods within the supply chain which have been found to be unsafe or do not meet legal requirements. These include notifications about Product Withdrawals, Product Recalls and Allergy Alerts. Where necessary, the FSA will issue direction to councils to take specific action to protect consumers.

All notifications that require action are recorded on our database with details of the actions taken recorded against the relevant premises.

The Council estimates that it will receive 85 notifications from the FSA during the year and 80% of these will require investigation and further action to protect public safety.

### **3.16 Rapid Alert System for Feed and Food (RASFF).**

With EU Exit, the UK has lost access to certain EU information systems including full access to the RASFF. As a result, the Food Standards Agency has developed the Risk Likelihood Dashboard to create a platform to enable more efficient and effective collation and sharing of relevant data for stakeholders involved in protecting public health in relation to imported food and feed. The Risk Likelihood Dashboard provides intelligence from consolidated data sources including historic TRACES data, RASFF Portal, refusals from other 3rd countries.

Local Authorities can still create RASFF notifications but have view only of RASFF notifications. Belfast City Council have access to the Risk Likelihood Dashboard and use it routinely to identify potential risks with imported foods and target surveillance accordingly.

If a consignment/product is to be rejected or destroyed due to a direct or indirect risk to human health, an incident report and rapid alert notification must be completed and forwarded to the FSA Food Incident Branch after consultation with FSA Northern Ireland for onward notification to the European Commission. It is likely that 5-10 notifications will be generated in 2023/2024.

### **3.17 Liaisons with Other Organisations**

The Food Safety and Port Health Unit has extensive liaison in place with a wide range of other organisations:

- Food Standards Agency NI (FSANI) through enforcement stakeholder meetings, the Northern Ireland Food Managers Groups (NIFMG), and numerous other formal and informal meetings.
- The Public Health Agency (MOU exists) in relation to the investigation of sporadic cases and outbreaks of food related infectious disease.
- NIFMG reporting to Environmental Health NI
- Association of Port Health Authorities. The Senior Environmental Health Officer (Port Health) is a member Port Health Liaison Network.
- The Department of Agriculture Environment and Rural Affairs in relation to the operation of the Border Inspection Post.
- Merchant Navy Welfare Board (NI)
- HM Customs and Excise nationally and locally in relation to imported food controls.
- Planning Service to review related applications.
- Department for Infrastructure Water Quality Liaison Group.
- Safe Food through projects and working groups on the Island of Ireland
- The Northern Ireland Area Medical Advisory Committee - Infectious Disease Sub-Group.
- Belfast Resilience-Harbour Working Group
- Maritime Coastguard Agency
- Belfast Harbour Commissioners
- The Education Authority for NI School Meals Service
- NI Takeaway association

Close liaison is maintained with the Council's Building Control Service, Pest Control and Waste Management Service, as well as with the other regulatory units.

### **3.18 Promotion of Food Safety and Healthy Eating/ Nutrition**

The Council carries out educational and promotional activities as an integral part of its food safety duties. In addition to this, specialist promotional activities are carried by the Food Safety Unit. Many of these initiatives are designed to promote healthy choices.

In 2023-24 we shall participate in nutrition survey of traybakes in local hotels and restaurants in conjunction with NI Food Manager's Group and FSA NI. The traybakes will be assessed for calorie content as well as other nutritional markers such as sugar and fat content with a view to collating the data and evaluating the results. These results will be used to create reformulation advice to provide healthier options.

The Council continues to participate in a fact-finding relating to premises that sell CBD products to gather information on supplier and manufacturer details in order to target specific enforcement in this ever-evolving area of Novel Foods.

Educational and promotional activities planned for 2023/2024 include the following:

Promotional Activity	Estimated Resources
Maintain and promote and manage the Food Hygiene Rating scheme (including the Online display regulations once these are published)	500 hours
The Council will review participation in the Caloriewise assessment project and aim to target the reassessments of Belfast Trust premises who have previously achieved the award.	50 hours
To provide an Imported Food/Port Health training day and recruitment promotional sessions for year 3 and 4 students on Environmental Health and other food related courses.	50 hours
To participate in relevant service wide business forums	50 hours
To publish at least one article in City Matters	5 hours
To develop relevant advice / information for businesses to assist them to comply with enforcement / legislative requirements	100 hours

## 4.0 Resources

### 4.1 Financial allocation

Details of the budget for the delivery of the Council's food service in 2023-2024 are within the City and Neighbourhood Service's revenue estimates and were approved by Council in February 2023.

### 4.2 Staffing allocation

#### 4.2.1 Food Safety and Port Health Unit

The full staffing compliment in the Food Safety & Port Health Unit has the equivalent of 19 full-time staff engaged in food safety work. All officers hold specific qualifications and are assessed for competencies as required by the Code of Practice and are authorised for duties in accordance with the Council's documented procedure. (See table below).

Position	Hours (Full or Part Time)	Authorisation	FTE
<b>Food Safety</b>			
City Protection Manager	FT	None	0.1
Senior EHO	FT	Full including Approvals	0.7
Senior EHO	FT	Full including Approvals	0.7
Senior EHO	PT	Full including Approvals	0.8
Senior EHO	FT	Full including Approvals	1.0

EHO	FT	Full including Approvals	1.0
EHO	FT	Full including Approvals	1.0
EHO	FT	Full	1.0
EHO	FT	Full including Approvals	1.0
EHO	FT	Full	1.0
EHO	FT	Full	1.0
EHO	PT	Full	0.5
EHO	FT	Partial	1.0
Technical Officer	PT	Full	0.8
Technical Officer	FT	Full	1.0
Technical Officer	FT	Full	1.0
Technical Officer	FT	Partial	1.0
EHO	1.5	Vacant	1.5

<b>Port Health/Imported food</b>			
City Protection Manager	FT	None	0.1
Assistant City Protection Manager PORT (daytime)	FT	Full with Approvals inc Port Health	0.7
Senior EHO PORT (daytime)	FT	Full inc Port Health	0.7
Senior EHO PORT (daytime)	FT	Full inc Port Health	1.0
EHO PORT (daytime)	FT	Full with approvals inc Port Health	1.0
Team Leader EHOs x4 (shift based)	FT	2 posts vacant, recruitment imminent	4.0
EHOs x10 (shift based)	FT		10.0
Technical Support Officer x8 (shift based)	FT	1 post vacant, recruitment imminent Limited to regulatory support activities	8.0
Port Health Support Assistants (shift based)	FT	1 post vacant, recruitment underway	8.0

Current short-term vacancies that cannot be covered by temporary contracts are on occasion covered by agency staff.

The Port Health shift-based staff (including Team Leader Environmental Health Officers, Environmental Health Officers, Technical Support Officers and Port Health Support Assistants) are employed on a temporary basis for Port Health to carry out required official controls on goods from GB following temporary funding from FSA.

\*Full Authorisation: authorised by Belfast City Council to enforce the provisions of The Food Safety Order (Northern Ireland) 1991 and any Orders or Regulations made thereunder or relating to the foregoing or having effect by virtue of the European Communities Act 1972.

#### **4.2.1a Estimate of Resource (Time) Requirements (based on pre Covid-19 data)**

##### **Food Hygiene/Food Standards**

<b>Activity</b>	<b>No Tasks</b>	<b>Time/task</b>	<b>Total Hours</b>
Cat A inspections Hygiene	5	5.5	82.5
Cat B inspections Hygiene	134	5	670

Cat C inspections Hygiene	472	4	1888
Cat D inspections Hygiene	1019	4	4076
Unrated and unplanned events (Hygiene)	200	5	1000
Cat A inspections Standards	15	3	60
Cat B inspections Standards	140	1.5	210
Unrated and unplanned events (Standards)	200	1.5	300
Revisits	200	1	200
Advisory and other visits	75	1	75
Micro sampling	1050	1	1050
Chemical sampling	350	2	700
Food Complaints	600	7	4200
ID investigations	100	2.5	250
Food Alerts For action	60	50	3000
Prosecutions	10	74	740
Other Service Requests	800	7	5600
Staff Development	17	30	510
Working groups and initiatives with other external partners and stakeholders including NIFMG and Sub-Groups, FSA, APHA	-	-	2000
Management of service and staff	-	-	2,500
Staff meetings	-	-	1000
Projects e.g., web development, procedures, campaigns	-	-	1000
Mandatory Food Hygiene Rating Scheme	-	-	1000

## Port Health

Activity	No Tasks	Time/task	Total Hours
Inspect all shipping and ferry Manifests	4300	0.5	2150
To screen Maritime Declaration of health documentation to monitor compliance with International Health Regulations and infectious disease	2000	0.5	1000
To inspect vessels for the issue of Ship Sanitation Certificates.	140	6.00	840
Documentary & phys. checks, including sampling, of foodstuffs imported from outside EU.	* (Estimated 44,000)	* (varies depending on task)	

\*This estimate reflects documentary, identity and physical checks on products of animal origin (fish and fish products), high risk food not of animal origin, plastic kitchenware, organic products and IUU Catch Certificates undertaken in 2023/23 and is likely to be subject to further development and resource planning in 2023/24 as statutory requirements, systems and processes are further developed/updated, and businesses adjust to the new



arrangements. The duration of tasks and degree of officer time varies according to commodity types and is under regular review with partners including FSA and DAERA as part of the annual resource allocation arrangements that are currently in place.

### **4.3 Staff Development Plan**

The development needs of the Food Safety and Port Health Unit are identified as part of the Council's business planning process, competency assessment and through personal development planning. Relevant local training is identified by the Northern Ireland Food Managers Group and subgroups, the Food Standards Agency Northern Ireland and the Public Health Agency. Training needs are also reviewed during the year to take into account staff changes and other issues identified. In-house briefing sessions are delivered regularly as part of monthly Unit meetings.

Competency requirements required by the Food Law Code of Practice are re assessed for all Officers annually and all deficiencies addressed in year.

#### **Food Safety Training Plan 2023-2024**

The priority training areas agreed between NIFMG and FSA and shall be provided as low-cost training. The key areas have been identified as follows:

- FHRS National Consistency Exercise
- Approvals Training
- Investigation & Search Techniques
- Investigation Case Study Day
- Food Standards Delivery Model
- EU Exit / Windsor Framework
- The new food hygiene delivery model

There is also access to online courses provided by the FSA, Saferfood, as well as refresher training via ABC Food Law. Port Health staff also avail of training on imported food controls via the Better Training for Safer Food programme.

The Public Health Agency have committed to reinstating the annual joint PHA/EHO training day for 2023/2024, that had been suspended due to the pandemic.

### **5.0 Quality Assessment**

The following arrangements are in place to ensure the quality of services provided by the Food Safety and Port Health Unit:

#### **5.1 Internal Monitoring Arrangements**

Procedures have been drawn up and implemented to monitor the quality of work of officers assigned to the Food Safety & Port Health Unit which cover all aspects of the Standard and help ensure procedures are fully implemented. Current procedures include:

- Regular individual meetings with lead officers
- Use of procedure notes

- Use of standardised inspection report forms, letters and phrases
- Review of post-inspection paperwork
- Monitoring of inspections, visits and actions by documentation checks and accompanied visits
- Post complaint investigation monitoring
- Approved premises file review and monitoring
- Internal auditing of adherence to procedures
- Monthly meetings of the Food Safety and Port Health Teams
- Seminars / exercises and training as required

## 5.2 External monitoring and verification

The Border Inspection Post is audited annually by DAERA, and the food service is periodically subject to both FSA and EU audits.

The inland food safety team were subject to an internal audit by the Council's Audit, Governance and Risk Services Unit. The audit report indicated that the key controls are in place and generally operating effectively with only some improvement needed.

The unit was also subject to an internal review as part of a wider review of city services and again received a favourable report with some minor improvements suggested.

The management team have agreed timelines to develop and introduce the proposed recommendations and suggestions.

## 6.0 Review

### 6.1 Review against the Service Plan

Performance against the unit's business plan is reviewed periodically. This includes a quarterly review by the Unit Management Team. Summary performance information on the previous years' service plan will be reported with each Food Service Delivery Plan. The report shall also identify any variance together with areas of improvement.

Performance report on Food Service Delivery Plan for 2022-2023

#### 1. Departmental Plan Targets

Performance Indicator	Target 2021-2022	Achieved 2022-2023
% Premises deemed broadly compliant	95%	87% The unit has seen a significant decrease in hygiene standards within food businesses particularly in relation to premises maintenance, pest control management and waste management which has resulted in overall decrease in premises deemed Broadly Compliant.

#### 2. Other relevant performance Information update for 22/23

Performance Indicator	Target 2022/23	Achieved % 2022/23	Explanation of variance and improvements for 2021/22

% Of the food hygiene recovery programme complete	100%	100%	Worked to FSA recovery plan with priority premises identified for inspection
% Of food complaints resolved within 8 weeks	75%	77%	Target exceeded
% Of food standards recovery programme completed	95%	100%	Worked to FSA recovery plan with priority premises identified for inspection
Micro Samples Taken	1050	75%	
Chemical Samples Taken	400	50%	
% Of urgent food complaints responded to within target (1 working day)	100%	100%	Target met
To investigate notifications of gastrointestinal illness within 24 hours and report to PHA within 24 hours.	90% returned within target	100%	Exceeded Target
	90% contacted within target	100%	Exceeded Target
% Of manifests examined for imported food stuffs	100%	100%	Target Met
Number of imported food consignments examined	This target was reported in the Food Service Delivery Plan in previous years, however volumes in 2022/23 have fluctuated significantly and are expected to change further in 2023/24 following introduction of the Windsor Framework. We will work with FSA and partners to identify suitable targets as systems and processes, and trade volumes become established.		