



Guide to Primary Production Food and Feed Hygiene Inspections in Scotland

Version 3, March 2011

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CONTACT TELEPHONE 01224 285175

Summary

Intended audience:	This guidance is applicable to local authority enforcement officers.
Regional coverage:	This guidance is applicable to Scotland.
Purpose:	This guidance is intended to provide advice on the primary production food and feed hygiene enforcement regime in Scotland, which is described in Annex 10 of the Food Law Code of Practice (Scotland) . The relevant legislation is EC Regulation No. 852/2004 and EC Regulation No. 183/2005 .
Legal status:	This guidance is dual purpose and is intended to accompany regulations and address best practice.
Essential actions to comply with regulation(s):	It is the responsibility of the Food and/or Feed Business Operator to comply with the Regulations. This guidance is intended to help enforcement officers understand the requirements and therefore enforce consistently and proportionately to food and feed businesses

REVISION HISTORY

This guidance follows the Government [Code of Practice on Guidance](#). If you believe this guidance breaches the Code for any reason, please contact us using the number on the front sheet. If you have any comments on the guidance, again please contact us on the number on the front sheet.

Revision No.	Revision date	Purpose of revision	Revised by
1	March 2011	Develop guidance based on consultation responses (August – November 2010)	Scottish Food Enforcement Liaison Committee (SFELC) Primary Production Enforcement Working Group (FSA Representation – Jacqui Angus)

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INTRODUCTION

This guidance is directed to local food and feed authorities, for carrying out primary production food and feed hygiene inspections. This guidance aims to provide advice on the primary production enforcement regime which is described in Annex 10 of the [Food Law Code of Practice \(Scotland\)](#). The scope of the guidance is as follows:

	Food	Feed
Livestock	In Scope	In Scope
Cereals	In Scope	In Scope
Fresh produce	In Scope	In Scope
Eggs	Out of scope (Egg and Poultry Unit (EPU) undertake primary production food hygiene inspections whilst carrying out egg marketing inspections, and separate guidance has been produced for this.)	In Scope
Dairy	Out of scope (existing regime in place)	In Scope
Shellfish	Out of scope (existing regime in place)	In Scope

This guidance is to be read alongside Annex 10 of the [Food Law Code of Practice \(Scotland\)](#). Food and feed authorities are required, under Regulation 7 of the [Official Feed and Food Controls \(Scotland\) Regulations 2009](#) to have regard to the Code when discharging their duties.

INTENDED AUDIENCE

This guidance is applicable to local authority enforcement officers.

PURPOSE OF GUIDANCE

This guidance is intended to provide advice to enforcement officers on the primary production food and feed hygiene enforcement regime in Scotland, which is described in Annex 10 of the [Food Law Code of Practice \(Scotland\)](#). The relevant legislation is [Regulation \(EC\) No. 852/2004](#) and [Regulation \(EC\) No. 183/2005](#).

This document is considered a working document and shall be reviewed on an annual basis. We would welcome feedback from Enforcement Officers on whether this guidance provides the information which they require and comments on presentation of information.

LEGAL STATUS OF GUIDANCE

These guidance notes have been produced to provide advice on:

- the legal requirements of [Regulation \(EC\) No. 852/2004](#) and [Regulation \(EC\) No. 183/2005](#) (as they relate to primary production only) and
- best practice in this area.

The guidance notes have been produced for enforcement officers.

GUIDANCE

PART 1: OVERVIEW OF PRIMARY PRODUCTION

1. Background

[Regulation \(EC\) No. 852/2004](#) on the hygiene of foodstuffs, and [Regulation \(EC\) No. 183/2005](#) on the hygiene of feedstuffs, came into force on 1 January 2006, with a transitional period until 1 January 2008 for feed hygiene. They apply to primary producers of food and feed and are executed and enforced in Scotland by [The Food Hygiene \(Scotland\) Regulations 2006](#) and the [Feed \(Hygiene and Enforcement\) Scotland Regulations 2005](#), as amended, respectively.

2. What is Primary Production?

	Food	Feed
Legal definitions	“the production, rearing or growing of primary products including harvesting, milking and farmed animal production prior to slaughter. It also includes hunting and fishing and harvesting of wild products”	“production of agricultural products including, in particular, growing, harvesting, milking, rearing of animals (prior to their slaughter), or fishing resulting exclusively in products which do not undergo any other operation following their harvest, collection, capture, apart from simple, physical treatment”
Relevant legislation	<p>Regulation (EC) No. 852/2004: Articles 3, 4(1) and 4(3)) and Annex I</p> <p>Regulation (EC) No. 178/2002</p>	<p>Regulation (EC) No. 183/2005: Article 4 and 5, Annex I and Annex III (for food producing animals)</p> <p>Regulation (EC) No. 178/2002</p>

<p>Exemptions from hygiene legislation</p>	<p>Primary production for private domestic use</p> <p>Domestic preparation, handling or storage of food for private domestic consumption</p> <p>Direct supply, by the producer, of small quantities¹ of primary products to the final consumer or to local retail establishments directly supplying the final consumer²</p> <p>Operations that alter the products or introduce new hazards e.g. peeling and slicing vegetables, bagging salad crops and application of preserving gases (would be subject to Annex II of Regulation (EC) No. 852/2004).</p>	<p>Food-producing animals kept for private domestic consumption, and for animals not kept for food production</p> <p>Feeding of food-producing animals kept for private domestic consumption or for the direct supply, by the producer, of small quantities of primary products to the final consumer or to local retail establishments directly supplying the final consumer;</p> <p>Feeding of animals not kept for food production</p> <p>Direct supply of small quantities³ of primary production of feed at local level by the producer to local farms for use on those farms</p> <p>Convection drying (using gas or oil) of cereals for feed use falls within the scope of Annex II of Regulation (EC) 183/2005, and will require the food business operator to implement and maintain procedures based on HACCP for this process.</p>
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¹ The Commission guidance (Dec 2005) suggests that the following activities be defined as „small quantities“ (the UK has yet to issue statutory guidance)

- Farmers who sell primary products (vegetables, fruits, eggs, etc.) directly to the final consumer e.g. farm gate sales or sales at local markets, to local retail shops for direct sale to the final consumer and to local restaurants.
- Individuals who collect products in the wild such as mushrooms and berries to deliver their yield directly to the final consumer or to local retail shops for direct sale to the final consumer and to local restaurants.

² Examples includes small producers directly supplying consumers (e.g. farm gate sales) or supplying local shops and restaurants

³ For the purposes of feed, “small quantities” has been defined as less than 20 tonnes per annum

<p>Primary Production includes</p>	<p>Production or growing of plant products, for food use, such as grains, fruits, vegetables and herbs as well as their transport within and to an establishment, storage and handling of primary products at the farm and their further transport to an establishment</p> <p>Production or rearing of food producing animals at the farm and any activity linked therewith as well as the transport of meat producing animals to a market, a slaughterhouse or the transport of animals between farms</p> <p>The harvesting of mushrooms, berries, snails etc. in the wild and their transport to an establishment</p> <p>Hunting of wild game (for further information, please see Annex 6)</p> <p>Activities at the point of primary production that merely improve their presentation, such as washing and trimming of vegetables, sorting and grading of fruit etc., air drying of cereals</p>	<p>Transport, storage and handling of primary products at the place of production</p> <p>Transport operations to deliver primary products from the place of production to an establishment</p> <p>Mixing of feed for the exclusive requirements of their own holdings without using additives (with the exception of silage additives)</p> <p>Air drying of grains</p>
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Officers involved in enforcement of primary production food and feed hygiene have a role in identifying activities on farm that fall outside of the scope of Annex I but within the scope of Annex II of the respective food and feed Hygiene Regulations. These activities are not covered in the scope of this guidance and steps should be taken to refer to the appropriately authorised officer in accordance with chapter 1.2.9 of the [Food Law Code of Practice \(Scotland\)](#) and the [Feed Law Code of Practice \(Great Britain\)](#).

The risk rating that should be applied to these businesses depends on the activities undertaken:

- Businesses engaged in Annex I (primary production) activities only are subject to the risk rating described in the [Food Law Code of Practice \(Scotland\)](#), Annex 10 (2% and 25%).
- Businesses engaged in Annex II (secondary production) activities only are subject to the risk rating described in the [Food Law Code of Practice \(Scotland\)](#) and the [Feed Law Code of Practice \(Great Britain\)](#), Annex 5 (as appropriate).
- The risk rating to be applied to businesses engaged in both primary and secondary activities will be that which is reflected by the higher risk activity. However, on grounds of proportionality, those activities which fall within the scope of primary production need only be inspected in accordance with the primary production risk rating.

In addition, the Food Standards Agency is working to reduce the burden of regulation, and therefore the number of inspections on farm. It is recognised that LAs may carry out primary production inspections at the same time as other inspections on farm, for example feed hygiene inspections for compliance with Annex II, animal health inspections and weights and measures inspections. This is acceptable provided the frequency of the primary production inspection is not less than that provided for in Annex 10 of the [Food Law Code of Practice \(Scotland\)](#).

PART 2: RISK ASSESSMENT – PRIMARY PRODUCTION FOOD AND FEED

The frequency of primary production food and feed hygiene inspections undertaken by local authorities will be determined by risk assessment. The risk rating is described in section A10.5 of the [Food Law Code of Practice \(Scotland\)](#).

Membership of a recognised farm assurance scheme is factored into the risk assessment as it may help the business to comply with hygiene requirements. However, the outcome of the inspection and local knowledge will have precedence in determining the appropriate risk rating for the business.

Officers are encouraged to ask the food/feed business operator for a copy of their assurance scheme inspection reports. This may be of use to identify problem areas, but inspections should not be limited to these areas. However, since the report is the property of the food/feed business operator, it must be recognised that it may not always be provided.

The following farm assurance schemes were evaluated by the Food Standards Agency against the requirements of the food hygiene legislation and are currently considered to meet those requirements.

- Assured British Meat (ABM)
- Assured British Pigs (ABP)
- Assured Chicken Production (ACP)
- Assured Combinable Crops Scheme (ACCS)
- Assured Produce (AP)
- Genesis Quality Assurance (GQA)
- Quality Meat Scotland (QMS)
- Farm Assured Welsh Livestock (FAWL)
- Northern Ireland Beef/Lamb Farm Quality Assured Scheme (NIBLFQAS)
- Scottish Quality Cereals (SQC)

PART 3: ON FARM INSPECTION AND ENFORCEMENT

1. Notice of Inspection

Article 3.2 of [Regulation \(EC\) No. 882/2004](#) requires that official controls shall be carried out without prior notification to the food/feed business operator, except in the case of audits where prior notification to the food/feed business operator is necessary. It is the view of the Food Standards Agency that where it is necessary to inspect records on farm, it is reasonable to provide prior notification. This period should not be excessive and kept to within 48 hours of the proposed visits, if at all possible.

2. Bio-Security

Bio-security measures are to be followed and information is available on the Scottish Government website: -

<http://www.sears.scotland.gov.uk/DocumentView.aspx?id=133>

<http://www.scotland.gov.uk/Publications/2002/11/15800/13887>

3. Roles of Local Authority and SGRPID Enforcement Officers

Both Local Authority officers and Scottish Government Rural Payments and Inspections Directorate (SGRPID) officers are authorised to carry out food and feed primary production enforcement.

If a local authority officer has sufficient concerns about the conditions/activities on farm, that may also have an impact on cross compliance, they should consider reporting this matter to SGRPID (see Annex 8 for contact details). If a breach is confirmed by SGRPID to have taken place, they must impose financial penalties. It is therefore possible that a farm may be subject to enforcement action by both the local authority and SGRPID.

SGRPID officers are authorised under Regulation 5(6) of the [Food \(Hygiene\) Scotland Regulations 2006](#) and Regulation 16(3) of the [Feed \(Hygiene and Enforcement\) Scotland Regulations 2005](#) for the purpose of enforcing primary production food and feed hygiene measures respectively. SGRPID officers are authorised to undertake inspections and to serve Hygiene Improvement Notices. If it is considered that action should be taken which exceeds the authorisation of SGRPID officers, they should contact the local authorities (either directly or via the Food Standards Agency).

4. The Inspection and Inspection Checklist and Reports

During the inspection, the officer should establish the scope of their activities and membership of any assurance schemes. A model form for recording this information is provided in Annex 4A.

Discussions with the producer should be focussed on the reduction and prevention of hazards. Annex 4B provides an example checklist which may be used by local authority officers. The areas marked with an asterisk on Annexes 4A, 4B and 4C are essential (1) for recording the inspection outcomes in the Scottish Primary Production Official Controls System (SPPOCS) database and (2) for providing the food or feed business operator with a report following the inspection. A single report, covering food and feed, and based on Annex 6 of the [Food Law Code of Practice \(Scotland\)](#) and the [Feed Law Code of Practice \(Great Britain\)](#) must be provided. It may be provided as a report left on the day of inspection or may be issued separately at a later date by the Food/Feed Authority.

Annex 4C may be a useful tool in summarising data required for SPPOCS. However, if the data is contained elsewhere, the completion of this form is optional.

Note that local authorities or liaison groups are free to adapt the forms for their own use, provided the fields marked with an asterisk are retained.

5. On Farm Incidents

The Food Standards Agency Scotland has a contract with the Scottish Agricultural College (SAC) to investigate on farm incidents in relation to livestock disease, illness or death. They will carry out post-mortems, provide veterinary advice and liaise with

appropriate bodies as necessary. Examples of such incidents might include sudden death of livestock caused by elevated levels of lead in their organs as a result of access to discarded batteries, flaking paint etc or copper poisoning of sheep. Should an enforcement officer be aware of such an incident, they should contact the Food Standards Agency.

6. SPPOCS (Scottish Primary Production Official Controls System) Database

The Food Standards Agency Scotland has developed a database on which primary production food and feed hygiene inspections are recorded.

The database is used to record primary production inspections by both local authorities and SGRPID (including the Egg and Poultry Unit) with the facility to attach reports etc. The information on the database is accessible to both parties, and the Food Standards Agency. The information gathered at the inspection shall be recorded on the “event form” which also has the facility to record membership of assurance schemes and follow-up action. The event form has also been designed to capture the necessary information which shall be used to inform the outcomes of the pilot⁴.

Guidance on the operation of the database has been developed and this has been made available separately.

⁴ Operating until spring 2011.

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ANNEX 1: GLOSSARY

EC	European Commission
EPU	Egg & Poultry Unit
FBO	Food Business Operator
FeBO	Feed Business Operator
LA	Local authority
PPP	Plant Protection Products
RTE	Ready to Eat
SAC	Scottish Agricultural College
SEPA	Scottish Environment Protection Agency
SG	Scottish Government
SGRPID	Scottish Government Rural Payments & Inspections Directorate
SMR	Statutory Management Requirement
SOA	Sole Occupancy Authority

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ANNEX 2: LEGAL REQUIREMENTS AND BEST PRACTICE

A. Summary of Requirements

	Food – livestock production	Food – plant products	Feed
1. General Food Law	✓	✓	✓
2. General Facilities	✓	✓	✓
3. Feed Storage and Handling			✓
4. Fields and grazings	✓		✓
5. Cleanliness of animals	✓		
6. Water	✓	✓	✓
7. Staff hygiene	✓	✓	✓
8. Pest Control	✓	✓	✓
9. Waste	✓	✓	✓
10. Animal Disease	✓		
11. Plant disease		✓	✓
12. Relevant analysis	✓	✓	✓
13. Additives and medicines	✓		✓
14. Plant protection products		✓	✓
15. Packaging of feed			✓
16. Record keeping	✓	✓	✓

The purpose of a feed /food primary production inspection is to verify compliance with Regulations (EC) Nos. [852/2004](#) and [183/2005](#) (Annexes I) which aim to reduce contamination of food and feed respectively.

Three case studies have been provided in Annex 3 to this document.

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B Legal Requirements and Recommended Practice

1. General Food/Feed Law

Aim

The FBO must not place food/feed on the market if it is unsafe. Food is considered to be unsafe if it is either injurious to health or unfit for human consumption. Feed is considered unsafe if it has an adverse affect on human or animal health, or makes the food derived from food producing animals unfit for human consumption. Procedures must be immediately initiated to withdraw the affected food/feed from the market and inform the competent authorities if it is suspected that it does not meet food/feed safety requirements.

(i) Check that the FBO/FeBO knows what to do if there is a requirement to withdraw of affected food and feed from the market place. There is no need to have written procedures.

(ii) The FBO/FeBO needs to be able to trace goods which have been supplied. Relevant information should include who the supplier is, date of receipt, quantity, any batch numbers etc. In addition, they should also be able to trace where their produce has been sent: name of customer, date of delivery/collection/sale (as relevant), quantity and any batch details. Existing records such as invoices, delivery notes, receipts etc may provide this information. There is no need for internal traceability (i.e. the ability to trace which raw materials were used for the production of the final product).

2. General Facilities

Aim

Control of contamination of primary products. Measures are to be put in place to ensure that facilities and equipment used for primary production, and associated operations, including transport and storage, are to be kept clean and where necessary after cleaning, they are to be disinfected. Feed and food plant products are to be kept clean.

(i) Steadings and sheds should be inspected for cleanliness, to ensure the hygiene of the produce and control of pest activity. Structures should allow for cleaning to take place, as far as practical.

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(ii) The officer should look for evidence of:

- The buildings, facilities and equipment being appropriately and regularly cleaned. Facilities and equipment are to be made of materials that can be effectively cleaned and disinfected, as necessary. They should be cleaned on a regular basis to prevent the build up of excessive dirt or muck.
- Facilities, equipment, containers, crates, packaging, vehicles and vessels used to transport or store harvested plant products are being cleaned i.e. free from contamination that poses a risk to food or feed safety, e.g. animal or bird muck, dirty water, no visible residues of fuel, oil, pesticides, pest control chemicals, glass, knives, blades, plasters, wood splinters or metal fragments. There is to be no visible evidence of pest infestation or mould spoilage.
- If vehicles or trailers are used to move primary products to a storage facility, the officer should be satisfied that they are kept clean and dry. The officer should determine whether any vehicles or trailers used for one purpose are also used for other purposes, which could result in cross contamination. If so, the officer should be satisfied that appropriate cleaning and disinfection takes place.
- The design of the store should ensure it is capable of being cleaned. Storage areas should be properly maintained in order that food/feed is protected from contamination including contamination from the materials used to construct the store e.g. concrete walls and floors.
- Lights and windows in buildings should be designed or shielded to avoid contamination of primary products with glass/plastic particles.
- In order to prevent the development of mould in storage facilities, it is important that
 - Cereals are dried adequately, or treated appropriately, before storage.
 - Ingress of moisture to the store is prevented
 - Stores are kept cool and dry

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3. Feed handling and storage

Aim

Feed business operators are to take adequate measures to clean, and where necessary disinfect facilities, equipment, containers crates, and vehicles used for producing, preparing, grading, storing and transporting feed. To ensure hygienic production, transport and storage conditions for feed. Feed equipment designed, constructed and placed in such a way that contamination is minimised.

- The officer should consider any risks arising from sources of contamination e.g. livestock having access to farm buildings or stores. In addition, consideration should be given to access to material which could cause harm to livestock or subsequently to human health e.g. ruminants having access to feed intended for other species which might contain bone meal, seeds, fertilizers, pesticides etc.
- The cleaning and, where necessary, disinfection practices associated with feed storage facilities (e.g. bulk bins) and feeding systems (e.g. chain feeders, troughs, tubes and pans) should be considered. The risks caused by inadequate cleaning and potential contamination from cleaning material used should be assessed.
- On sites where milling and mixing of feed takes place, the inspection should determine the source of the ingredients used, including the source and type of any concentrates or supplements used. Consideration should be given to whether the feed business operator falls within the scope of Annex II of [Regulation \(EC\) No. 183/2005](#). Annex 5 of this document provides some examples of such activities. The officer should check how each ingredient is stored on the site (e.g. in bags or bulk) and whether there are risks of contamination due to a lack of cleanliness of storage facilities, moisture, the presence of animals and pests and any other factors.
- On sites where finished feed is bought-in, the inspection should establish whether storage is in bulk or in bags and assess the risks of contamination, as above. The officer should be satisfied that the feed is sourced from a registered/approved supplier and that any supplements provided are also unlikely to lead to contamination risks. If veterinary medicinal products are used, this must be recorded (see section 13 below).
- Packaging used for the storage of materials produced on-site should be protected from contamination.

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4. Use of Fields and Grazing

Aim

Control of contamination of primary products which could arise from the land and fertilisers. Grazing of pastures and croplands are to be managed to ensure minimal contamination of foods of animal origin. Where appropriate, an adequate rest period shall be observed before allowing livestock to graze on pasture, crops and crop residues and between grazing rotations to minimise biological cross contamination from manure, where such a potential problem exists. The withholding periods for agricultural chemical applications are observed.

4A. Use of land for grazing

- (i) The site selected for grazing should be appropriate for its use, with the history of previous use taken into consideration to ensure minimising the risk of contamination. Consideration should also be given to what has been applied to the land such as composts. Ensure the grazing ban (Regulation 7 of [Animal By-Products \(Enforcement\) \(Scotland\) Regulations 2011](#)) has been observed. In addition, the [UK Safe Sludge Matrix](#) should be considered in relation to grazing.
- (ii) Grazings should be free from sources of harmful contamination e.g. discarded batteries, machinery, litter, etc. Pastures and grazings should be managed to enable the control of harmful weeds e.g. Common Ragwort. See [SAC Ragwort Control Leaflet](#)

4B. Use of land for growing crops

- (i) The site selected should be appropriate for its use, with history of previous use taken into consideration. Officers should establish what steps the FBO/FeBO has taken to address this requirement.
- (ii) Further guidance available:
 - The [UK Safe Sludge Matrix](#).
 - [FSA Mycotoxin guidance](#)
 - [FSA Manure Guidance](#)
 - [Scottish Code of Practice for Use of Plant Protection Products](#)

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- Guidance on the application of animal manures and other fertilisers to growing crops or land before planting and [Scottish Government's Prevention of Environmental Pollution from Agricultural Activity \(PEPFAA\) Codes.](#)

5. Cleanliness of animals

Aim

Animals going to slaughter and production animals should be kept clean

- (i) The buildings in which the livestock are housed should be checked to ensure good ventilation and drainage.
- (ii) The officer should establish whether the farmer has an understanding of the need for animals to be clean prior to transport for slaughter e.g. by bedding on straw and/or clip and that transport vehicles (including contractors) have been cleaned and disinfected before loading.
- (iii) For further information on the cleanliness of animals, please refer to [FSA Clean Livestock Guidance](#)

6. Water

Aim

Food Primary Production use potable, or clean, water wherever necessary

Feed Primary Production: use clean water

Good Feeding Practice: drinking water should be of an appropriate quality. Watering equipments should be designed, constructed and placed to ensure that contamination of water is minimized.

Watering systems shall be cleaned and maintained regularly.

- (i) Animals should be prevented from drinking from a contaminated source, as far as possible.
- (ii) The inspection should determine the source of the water supply. If a non-mains supply is used (e.g. borehole, streams), the officer may need to consider the following:

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- if the source is suitable for its intended use (consideration given to environmental and hygiene arrangements),
- the design,
- the use of any water treatment systems,
- whether water quality tests that have been undertaken to establish the safety of the water.

Consideration should also be given to undertaking a risk assessment on water sources used on the production holding to ensure water does not pose a risk to food safety.

(iii) The producer should assess the cleanliness of drinking systems and the risk of water contamination. The officer should check that sources of water are protected from contamination, as far as practical. Since it is possible that troughs/ water drinkers could become contaminated, it is important that there is a cleaning regime in place for them.

(iv) Water harvesting systems (e.g. rainwater water collected from building roofs etc.) should be assessed for suitability of use. Water from such systems is of non-potable standard unless an appropriate treatment is installed. A risk assessment should be carried out, particularly where water is used for drinking water for animals, irrigation of ready-to-eat crops or spraying.

7. Staff - Hygiene and Training/Knowledge

Aim

Ensure that staff are in good health, undergo training on health risks and have the requisite ability, knowledge and competency.

(i) The ability, knowledge and competency of staff shall be commensurate with their activities. Adequate training shall be identified, and/or supervision for staff. It is good practice to keep training records, although not essential.

(ii) Depending on the nature of activities, particular emphasis should be given to the availability and suitability of hand cleansing and drying facilities. The officer should ascertain the type and location of facilities provided (e.g. hand wash basins, gel dispensers, towels etc.) and the range of tasks that staff may be performing as a basis for

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assessing the suitability, or otherwise, of facilities. The officer should be satisfied that the facilities in place are being used appropriately by staff on a regular basis.

(iii) Staff, contractors and visitors should be aware of, and follow, basic hygiene principles, e.g. likely hazards and sources of contamination, importance of personal hygiene, need for clean hands, clothing and footwear, cleaning and disinfection methods.

(iv) There should be adequate provision of protective clothing and/or equipment, if necessary.

(v) There must be an understanding that anyone suffering from, or being a carrier of, a disease likely to be transmitted through food must be prevented from handling ready to eat (RTE) foods.

(vi) If staff, contractors and visitors handle RTE foods, it is good practice for there to be a personal hygiene policy that includes the need for personnel to undergo health screening and to receive induction training in food hygiene or to be supervised.

(vii) The officer may question management and staff to establish whether they are competent and understand hygiene and food safety requirements e.g. correct use of animal medicines, pesticides and biocides.

8. Pest Control

Aim

To prevent pests and animals causing hazardous contamination

(i) The producer should be able to describe their pest control procedure. If carried out by a contractor, the officer should ascertain the frequency of visits and determine if corrective action has been taken, as appropriate. If carried out by farm staff, the officer should be satisfied that those involved are competent to carry out the work. The officer may ask to see any documentary evidence of the inspections undertaken and the products used.

(ii) The inspection should include sheds, stores and any feed mixing areas. These should be assessed to determine whether the construction and maintenance is suitable for the exclusion, as far as possible, of animals and pests, including wild birds, rodents and domestic animals, if this is deemed necessary to protect food/feed from contamination.

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Buildings should be inspected for gaps and holes which would allow entry, and for evidence of pest activity.

(iii) In order to minimise the number of harbourages for pests, the inspection should verify that areas inside and around buildings are kept clean and tidy and that any vegetation around the buildings is kept low at all times of the year, if practical to do so.

(iv) The officer should verify that conditions within the buildings, and surrounding areas, do not contribute to a potential pest infestation:

- Muck, dirt, spoiled feed and waste should be removed regularly to minimise and avoid attracting flies, birds or rodents.
- All areas should be kept tidy.
- Harbourage points such as overgrown areas or redundant scrap metal should be removed
- Feed/litter spillages should be cleared inside and outside building.
- Access of pests and pets to growing crops should be minimised, as much as possible by fencing, netting etc,

(v) The officer should identify if there is any evidence of damage to food/feed by vermin.

(vi) The farmer should ensure that pesticides are not accessible to the livestock at any time. Bait boxes, where used, should be checked for spillage.

(vii) Where pets are present on farms, they must not present a risk of contamination to the food or feed. They must be excluded from feed/food storage and production areas, where possible.

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9. Waste and Hazardous Substances

Aim

To store and handle waste and hazardous substances, separately and securely, so as to prevent contamination

Farmers have duty of care to look after waste. Waste must be stored and handled safely and securely to prevent misuse or contamination. The waste should not be kept for long periods of time as it increases risk of contamination.

9A. General Waste

(i) If using containers for storing waste, they should be good condition and labelled. Any old labelling should be removed when re-using containers. Clear instruction should be available to staff on how to store and dispose of waste and how to deal with spillages.

(ii) Any liquid waste should be prevented from escaping into drains, watercourses or surrounding ground.

(iii) Consideration should be given to how waste is transported within the business. Farmers need to ensure that waste is transported in suitable containers and vehicles without causing contamination.

(iv) Animals should be prevented from having access to waste. Appropriate storage and disposal of general household waste should be in place.

(v) FBOs/FeBOs should ensure that contractors collecting waste are registered with an appropriate body for transferring waste. Waste transfer notes should be kept for two years.

(vi) Some types of waste generated on farm, which may be harmful to human health or environment are classified as special waste and require additional controls. Special waste includes: animal health products, pesticides and herbicides, chemical waste, solvents, waste oil, asbestos, lead acid batteries, electrical equipment containing hazardous components, fluorescent light bulbs and smoke canisters such as empty rabbit, mole or rat poison containers which contain gassing compounds such as aluminium phosphide, empty oil containers (other than of edible oil). Special waste must go to a facility which has licence for dealing with such waste. Special Waste Consignment note needs to be completed and kept for 3 years.

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9B. Animal By-Products

- (i) The officer should be satisfied that dead animals are removed through an approved route. Any dead animals awaiting disposal should be stored in a way that will not allow potential contaminants to spread. Any incinerators used for burning carcasses have to be approved by Animal Health. On-farm burial is permitted in selected areas in Scotland, but farmers carrying out on-farm burial have to observe rules applicable to them e.g. appropriate distance from a water course. See section 10 of [SG's Prevention of Environmental Pollution from Agricultural Activity \(PEPFAA\) Codes](#).
- (ii) Disposal of all animal carcasses must be recorded and a record kept for two years.
- (iii) The officer may ask to see mortality records and evidence of carcass disposal methods e.g. agreements in place for off-site disposal. The [Animal By-Products \(Enforcement\) \(Scotland\) Regulations 2011](#) sets out requirements for the storage and disposal of carcasses.
- (iv) Slurry and manure for use on farmers own land is not classified as waste. Slurry and manure originating from other farms should be treated as waste. If any manure, slurry, etc is stored on site, the officer should be satisfied that it is not likely to cause a hygiene or disease risk and that animals are prevented from having access to them. SEPA is the enforcing authority for The Sludge (Use in Agriculture) Regulations 1989 (as amended). The Food Standards Agency considers that the application of sewage sludge to agricultural land should not present any unacceptable risks to food safety, provided that it is carried out in compliance with the statutory requirements and the provisions of the Safe Sludge Matrix (see below).
- (v) A range of industrial wastes and compost originating from recycling activities can be applied to agricultural land. Any sewage sludge has to be treated before being applied to land. Use of raw (untreated) sewage sludge on agricultural land is not permitted. Abattoir waste (muck and manure from lairage, and blood and gut content) can be spread to agricultural land subject to specific conditions.
- (vi) Further information can be found in the
- The [UK Safe Sludge Matrix](#)
 - Guidance on the application of animal manures and other fertilisers to growing crops or land before planting and [SG's Prevention of Environmental Pollution from Agricultural Activity \(PEPFAA\) Codes](#).
 - [Scottish Code of Practice for Using Plant Protection Products](#).

ANNEX 2

- http://www.sepa.org.uk/waste/waste_regulation/agricultural_waste.aspx
(SEPA Agricultural Waste FAQ)
- <http://farmwastesc.netregs.gov.uk/default.aspx>
- For consumer and industry advice on the use of pesticides, further information can be found at: <http://www.food.gov.uk/safereating/chemsafe/pesticides/>

10. Zoonotic Disease

Aim

To prevent the introduction and spread of contagious diseases transmissible to humans through food, including taking precautionary measures when introducing new animals and reporting suspected outbreaks of such diseases.

- (i) Animals should be kept in conditions that ensure their health and welfare, therefore limiting the potential for zoonotic diseases. It is good practice, although not required, for the farm to have in place an Animal Health Plan detailing preventative measures for disease control, dealing with the outbreak of disease etc
- (ii) The outbreak of zoonotic disease may be affected by the condition of the buildings and facilities and reference should be made to section 2 within this annex.
- (iii) The officer should satisfy himself/herself that the farmer is aware what actions are to be taken in the following circumstances:
- When introducing new animals on the holding statutory standstill or separation rules apply.
 - The veterinary surgeon should be contacted when there is a suspicion that an animal is sick, and veterinary advice should be followed.
 - Any results of analysis, which may have an effect on food safety, should be acted upon
 - Any outbreaks of notifiable diseases should be reported to the appropriate body – Animal Health or the Local Authority.

ANNEX 2

11. Plant Disease

Aim

To control the hazards relating to plant health that have implications for human health and feed safety

11A. Fusarium

(i) Cereals infected with fusarium can produce toxic mycotoxins, which can affect human and animal health when ingested. Fusarium mycotoxin levels are quite low in Scotland however they have increased during recent summers.

<http://www.food.gov.uk/multimedia/pdfs/fusariumcop.pdf>

(ii) Officers should ensure that farmers are aware of the measures that should be in place to prevent the production of fusarium mycotoxins. The FBO or FeBO should be aware of appropriate preventive measures that can be taken to manage fusarium contamination and the circumstances in which they should be employed.

FSA Managing mycotoxin risk guidance:

<http://www.food.gov.uk/foodindustry/farmingfood/fusarium/>

11B. Ergot

(i) Ergot which affects cereals (mainly rye, wheat, barley, triticale, rarely oats, sometimes grasses), can act as a host to fungus *Claviceps*. Each sclerotium contains high concentrations of alkaloids, which are highly toxic when ingested by humans or animals.

(ii) Fields or field verges where ergot has been identified, must be managed to reduce ergot infestation the following growing season (e.g. deep ploughing). Batches of grain with ergot present can be used for food/feed provided that effective screening is applied to remove all ergot. However, in practice grain with ergot present is rejected for food/feed use.

Further info: <http://www.sac.ac.uk/consulting/services/c-e/cropclinic/clinic/diseases/ergot>

ANNEX 2

12. Relevant analysis

Aim

To take account of the results of any relevant analyses carried out on samples taken from animals/plants or other samples that have importance to feed safety and/or human health

(i) The officer should ascertain if any results of analysis are available which relate to the production of feed or food. Where analytical results are available, these should be examined.

(ii) The officer should verify that appropriate action has been taken when results of analysis indicates a risk to food or feed safety.

(iii) Examples of analyses having importance to food/feed hygiene or safety include:

- Water sampling - if analysis reveals that water may pose risk to food safety, the water supply should be reviewed. Remedial work should be carried out to remove or reduce contamination or an alternative source should be used.
- Ergot – see above
- Salmonella - Salmonellosis is a serious disease and livestock may carry bacteria, which can enter food chain through contaminated carcasses. When salmonella presence has been confirmed on farm, appropriate steps have to be taken to reduce the risk of spreading and cross-contamination. Infection survives in dirty bedding, equipment and buildings and staff in contact with infected areas can transmit bacteria to non-infected areas. Where salmonella has been confirmed the producer needs to demonstrate that:
 - he has taken steps to prevent spread of infection;
 - affected areas have been cleaned and disinfected, including equipment and tools;
 - good personal hygiene is in place;
 - biosecurity measures implemented.

Special rules apply for control of Salmonella in laying flocks. For further information, refer to [Code of Practice to Control Salmonella in Feeds](#)

ANNEX 2

13. Additives and medicines

Aim

To use feed additives, and premixtures of feed additives, and veterinary medicinal products correctly, as required by relevant legislation

(i) The officer should ascertain if any livestock currently on site has received any veterinary medicine. If so, the officer should be satisfied that there has been appropriate veterinary input and that farm personnel involved in administration have adequate experience and suitable knowledge of procedures and withdrawal periods. Only authorised products obtained from a registered supplier may be used.

(ii) Treated animals must be identified and a record kept of dates of administration of the treatment i.e. veterinary medicines or other treatments, and withdrawal periods. Medicine records for food producing animals are to be kept for at least five years (a requirement of [The Veterinary Medicines Regulations 2009](#)) are to be kept for five years.

(iii) Medicines must be stored safely and securely and medicated feeds kept separate from other feeds and clearly labelled.

(iv) Farmers using silage additives must follow the instruction for use and rates of incorporation. They should retain records relating to the nature, quantity and source of the additives.

(v) Farmers using feed additives, other than silage additives, must comply with Annex II of 183/2005 and have HACCP in place.

Additional information is available in [Responsible Use of Medicines in Agriculture Alliance \(RUMA\) guidelines](#)

The list of registered feed additives is found at:

http://ec.europa.eu/food/food/animalnutrition/feedadditives/comm_register_feed_additives_1831-03.pdf

ANNEX 2

14. Plant protection products (PPP)

Aim

To use plant protection products and biocides correctly, as required by the relevant legislation

(i) Producers are obliged to use PPP and biocides safely and in accordance with law. Pesticide applications should be carried out at the right time, at the correct rate and in the correct manner using the correct product. Only products approved at the time of application can be used. Operators carrying out pesticide applications must be appropriately trained and/or qualified. Any directions of use included in the product's label should be followed.

(ii) The officer should satisfy himself/herself that the recommendations and legal requirements on rates of use/ harvest intervals are being followed and that applications of all PPP are recorded. It is recommended that those records are kept for at least 3 years.

(iii) PPP are to be stored correctly. Only approved products should be present on premises in the original container with the label. Health and Safety Guidance on storing pesticides for farmers and other professional users: <http://www.hse.gov.uk/pubns/ais16.pdf>

(iv) Other information can be found at:

- <http://www.pesticides.gov.uk/approvals.asp?id=871>
- [Code of Practice for Using Plant Protection Products in Scotland.](#)
- [Codes of Good Agricultural Practice \(UK\).](#)
- [FSA Pesticide Guidance](#)

ANNEX 2

15. Packaging

Aim

To ensure that packaging materials are not a source of hazardous contamination to feed

(i) Animal feed must be free from packaging. The officer should ascertain if the livestock farm is using feed derived from co-products of food. If so, the co-products must be free from contamination caused by remnants of packaging.

(ii) If bags are used for the storage of feed on farm, consideration should be given to the previous use of the bag. Bags, sacks or containers which were used previously for other purposes can be re-used provided they are cleaned adequately to prevent contamination. Old labelling/markings may lead to confusion or mis-use and should be removed. Some products pose higher risk (treated grain, some fertilisers and chemicals) and residues are difficult to remove. Bag and containers containing such products should not be re-used for feed.

(iii) The officer should check the storage area and the condition of the packaging. Gross contamination of packaging can lead to contamination. Such packaging should be removed if possible.

16. Record Keeping

Aim

To keep and retain records in relation to the control of hazards, in an appropriate manner, for an appropriate period, commensurate with the nature and size of the business. This information should be available to the authorities and customers, on request

Reference should be made to the guidance document:

“Guidance for Farmers on Record Keeping Requirements of Annex I of EC Feed Hygiene Regulation (183/2005) and Annex I of EC Food Hygiene Regulation (852/2004)”
<http://www.food.gov.uk/scotland/regsscotland/regsguidscot/feedfoodrecordkeepingregsscot>

In addition to statutory record keeping under existing Community or domestic legislation, appropriate records should be kept and maintained, proportionate to the nature and size of the business.

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Livestock

(i) An officer may ask to see any of the following records during the inspection:-

- Details of the nature and origin of feed fed to the livestock (e.g. feed supplier and specification as indicated on delivery note, invoice or label)
- Veterinary medicinal products used, the date(s) of administration and any withdrawal periods
- Information on the occurrence of diseases that may affect the safety of the products of animal origin (e.g. relevant veterinary reports)
- The results of any analyses carried out on animals or other samples that have importance for human health
- Any relevant reports on checks carried out on animals or products of animal origin
- Records relating to waste disposal

Arable

(i) An officer may ask to see any of the following records during the inspection:-

- Use and disposal of plant protection products and biocides
- Information on the occurrence of pests or diseases that may affect the safety of the products of plant origin
- The results of any analyses carried out on plants or other samples that have importance for human health
- Any relevant reports on checks carried out on plants or products of plant origin

Feed

(i) An officer may ask to see any of the following records during the inspection:-

- Any use of plant protection products and biocides
- Information on the occurrence of pests or diseases that may affect the safety of feed

ANNEX 2

- The results of any analyses carried out on primary products or other samples that have importance for feed safety
- The source and quantity of each input of feed and the destination and quantity for each output of feed.

ANNEX 3

ANNEX 3: CASE STUDIES

Action taken by enforcement officers should be in line with the Enforcement Policy of the local authority. The Food and Feed Law Codes of Practice state that food or feed authorities should ensure that enforcement action taken by their authorised officers is reasonable, proportionate and consistent with good practice. Any enforcement action should be carried out by an appropriately authorised officer.

Except where circumstances indicate a significant risk, officers should operate a graduated and educative approach starting at the bottom of the pyramid i.e. advice/education and informal action and only move to more formal action where the informal does not achieve the desired effect.

The decision to take formal action will depend on whether it is considered proportionate to do so, if informal action is deemed inadequate or there is a history of non-compliance. The FBO/FeBO may agree to take voluntary action. If an informal approach is adopted, then correspondence should contain sufficient information to adequately inform the FBO/FeBO of the action they are required to take and the reasons why. It should be discussed and, if possible, agreed with the FBO/FeBO.

It is important to note that the Food and the Feed Regulations are not prescriptive and that there may be more than one way to address the requirements of the Regulations. It will be the responsibility of the FBO/FeBO to demonstrate that the measures that they have put in place are adequate to protect the feed/food from contamination.

ANNEX 3

Case Study 1 – Contaminated Bread Meal

During an inspection of a store on a livestock farm, an officer notices a container of bread meal with a large amount of visible packaging. This bread meal is bought in from a local supplier.



1. What are the concerns?

Bread meal showing contamination with wrapper and button

2. Key Legal Requirements

EC Regulation 183/2005, Annex I

Feed business operators shall meet the obligations by complying with appropriate Community and national legislative provisions relating to the control of hazards, including:

(i) measures to control hazardous contamination such as that arising from the handling and disposal of waste,

Where appropriate, feed business operators shall take adequate measures, in particular:

(f) to ensure that packaging materials are not a source of hazardous contamination of feed;

ANNEX 3

EC Regulation 852/2004, Annex I

Notwithstanding the general duty laid down in paragraph 2, food business operators are to comply with appropriate Community and national legislative provisions relating to the control of hazards in primary production and associated operations, including:

(a) measures to control contamination arising from feed, fertilisers, veterinary medicinal products,

Food business operators rearing, harvesting or hunting animals or producing primary products of animal origin are to take adequate measures, as appropriate:

(a) to keep any facilities used in connection with primary production and associated operations, including facilities used to store and handle feed, clean and, where necessary after cleaning, to disinfect them in an appropriate manner;

3. Suggested course of action

- The bread meal must not be fed to animals. Packaging in feed is not permitted.
- The feed materials should be isolated and detained to prevent the feed being used. The FeBO may agree to voluntarily surrender the feed.
- Steps are to be taken to identify the supplier of the feed and where the contamination occurred (at the supplier or on farm).
- If the contamination originates on the farm, action must be taken to identify and isolate the source of that contamination. Remove the feed and store elsewhere until the source of contamination has been addressed. Repair and maintain equipment, if necessary, or review of process.
- Depending on the nature and severity of the contamination consideration should be given to destruction of feed or re-processing. Can re-processing adequately reduce the level of contamination?
- A revisit may be appropriate to determine if the necessary action related to equipment or processes on farm has been effective.
- If necessary, consider prohibition procedures if an informal approach is deemed to be inadequate.

ANNEX 3

Case Study 2 – Feed Store

The following feed storage area was found on a mixed livestock farm: feed storage bays separated by old painted doors. Livestock have access to the area.



1. What are the concerns?

The doors used to divide the storage space are painted. It is not clear what sort of paint has been used for doors. Lead paint poses a particular hazard to calves.

There could be a risk of cross contamination in the store between feeds, for example:

- medicated and non-medicated feed,
- feed materials and additives/premixtures containing additives,
- feed materials suitable for one species contaminating feed which may be hazardous to other species (e.g. sheep feed contaminated with cattle feed containing copper supplementation)

ANNEX 3

The contamination may occur as a result of mixing in situ, contamination from the shovel or any other equipment.

Consideration needs to be given to what else is stored here and whether feed/other materials have been adequately identified.

2. Key Legal Requirements

EC Regulation 183/2005, Annex I

Feed business operators responsible for primary production of feed shall ensure that operations are managed and carried out in such a way as to prevent, eliminate or minimise hazards with the potential to compromise feed safety.

Feed business operators shall ensure, as far as possible, that primary products produced, prepared, cleaned, packed, stored and transported under their responsibility are protected against contamination and spoilage.

Where appropriate, feed business operators shall take adequate measures, in particular:
to keep clean and, where necessary after cleaning, to disinfect in an appropriate manner, facilities, equipment, containers, crates and vehicles used for producing, preparing, grading, packing, storing and transporting feed;
to ensure, where necessary, hygienic production, transport and storage conditions for, and the cleanliness of, feed;
to prevent, as far as possible, animals and pests from causing hazardous contamination;

Feed business operators shall keep records relating to measures put in place to control hazards, in an appropriate manner and for an appropriate period, commensurate with the nature and size of the feed business. Feed business operators must make relevant information contained in these records available to the competent authority.

EC Regulation 852/2004, Annex I

..... food business operators are to comply with appropriate Community and national legislative provisions relating to the control of hazards in primary production and associated operations, including:

(a) measures to control contamination arising from feed, fertilisers, veterinary medicinal products, plant protection products and biocides and the storage, handling and disposal of waste;

EC Regulation 178/2002, Article 18(1)

The traceability of food, feed, food-producing animals, and any other substance intended to be, or expected to be, incorporated into a food or feed shall be established at all stages of production, processing and distribution.

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3. Suggested course of action

A number of questions must be asked to establish if there is a breach.

Feed

- Consideration should be given to the detention of the feed unless the FeBO agrees to voluntary surrender it.
- Consideration needs to be given to other feed/items being stored in the area. Is there any risk of contamination from one to the other?
- Are the items being stored adequately identified or labelled? Are records kept?

Tools

- There should be a cleaning regime in place for the tools to ensure there is no risk of cross contamination, or have dedicated tools or equipment.
- It would be good practice to have a label, or other means of identification, on equipment.

Door

- Lead paint is a hazard, particularly to young cattle. Cattle must be denied access to feed store and should not be able to access the lead paint on the door. Flaking paint could lead to contamination of feed.
- If the door is painted with lead paint, the door or paint should be replaced.

ANNEX 3

Case Study 3 – Fresh Produce (reproduced from training courses 2010/11)

1. Scenario

Geoff Brownlie is a traditional tenant farmer. His holding is small (22 acres in total) with 9.5 acres split evenly between two different fields exclusively dedicated to strawberries¹. The farm uses polythene tunnels to maximise the fruit-producing interval for the crop. Picking season is May - October.

There are a core number of permanent, year-round employees. The majority of fruit pickers are employed seasonally, mostly students and overseas workers. Some workers return for more than one year. There is not a formal interview process for seasonal staff, but the farmer does have a basic questionnaire to assess suitability of staff². He provides workers with boots³. The farm allows members of the public⁴ to pick fruit for themselves.

There are two field toilets⁵ provided and a drinking water tap⁵. There are two hand-washing stations⁵ provided.

Two years ago the farm sunk a borehole⁶ in response to flood-related problems with the mains and river water supplies.

There is generally a single application of manure made before planting. The manure applied is in the form of composted farmyard manure⁷ and is a mix of material from horses, pigs and cattle⁸ manure provided from a neighbour's farm. The manure is composted using a windrow-style composting system with defined turning and watering (borehole water) intervals. This is carried out on site and then composted in an outbuilding nearby⁹.

Irrigation water is taken from the farm borehole¹⁰. Water is applied by drip feed from soil-borne¹¹ hoses. The acceptability criteria used by the farm is determined by the supplier codes of practice for one of their major retailers.

Fruit is picked by hand¹² into plastic packs¹³ that are used for display by the retailers he supplies. There is no washing of the crop prior to packing¹⁴.

Once harvested, the fruit is transported via trailer¹⁵ to a nearby store room where they are cooled using refrigerated air which is forced by fan¹⁶ through crates stacked with berries. They are then distributed using a commercial distributor in temperature controlled vans¹⁷.

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2. Key Legal Requirements

EC Regulation 1831/2003, Annex I

As far as possible, food business operators are to ensure that primary products are protected against contamination, having regard to any processing that primary products will subsequently undergo.

Notwithstanding the general duty laid down in paragraph 2, food business operators are to comply with appropriate Community and national legislative provisions relating to the control of hazards in primary production and associated operations, including:

- (a) measures to control contamination arising from the air, soil, water, feed, fertilisers, veterinary medicinal products, plant protection products and biocides and the storage, handling and disposal of waste;

Food business operators producing or harvesting plant products are to take adequate measures, as appropriate:

- (a) to keep clean and, where necessary after cleaning, to disinfect, in an appropriate manner, facilities, equipment, containers, crates, vehicles and vessels;
- (b) to ensure, where necessary, hygienic production, transport and storage conditions for, and the cleanliness of, plant products;
- (c) to use potable water, or clean water, whenever necessary to prevent contamination;
- (d) to ensure that staff handling foodstuffs are in good health and undergo training on health risks;
- (e) as far as possible to prevent animals and pests from causing contamination;
- (f) to store and handle wastes and hazardous substances so as to prevent contamination;
- (g) to take account of the results of any relevant analyses carried out on samples taken from plants or other samples that have importance to human health;
and
- (h) to use plant protection products and biocides correctly, as required by the relevant legislation.

ANNEX 3

3. Suggested Course of Action

1. Depending on culture system the risk associated with these is that the fruit is low to the ground – risk from soil and irrigation water contamination. They are also accessible to vermin. A control can be to grow in raised beds. The poly-tunnels will protect from bird droppings and contamination from heavy rainfall and the splash back from the soil associated with this
2. Risk from workers. Does the farmer include a health questionnaire for all staff (seasonal and permanent)? Does he have an exclusion policy if they contract an enteric illness? Does he have cleanliness standards for staff? Are all his staff trained in food safety and hygienic production? Staff should be trained and/or supervised in accordance with their activities, for example provided with rules to be applied relating their activities.
3. Risks from unclean and inappropriately handled Personal Protective Equipment (PPE). Are there facilities for boot cleaning and facilities for glove disposal and replacement? If so, these should be located at a suitable point in the field. Staff wearing their own clothes on to a site could be a risk. The farmer could provide coveralls and ensure these are not taken home and are regularly laundered. The farmer could also supply hairnets in fruit storage areas.
4. Visitors to the site should also be vetted with a health questionnaire. They could be provided with PPE and asked to wash hands before entering the site. Further controls could be introduced by asking the pickers to not eat the fruit as they go or by having a field specifically for pick your own. Are there facilities for boot cleaning? Pets should not be permitted to enter picking areas.
5. Waste from toilets, drinking facilities and washing station can be a risk, which can be controlled by situating them a reasonable and suitable distance away from the crops and having a reliable company service and maintain them. Care should be taken to ensure that drainage will not cause contamination. Specific care should be taken when emptying portable toilets.
6. Risk from contamination from run-off, flooding and leaching. These can be minimised by ensuring the borehole is of a suitable depth, is lined and that steps are taken to avoid contamination from run-off and other land practices.
7. Risk from inadequately composted farmyard manure. How does the farmer ensure that it is correctly carried out? What parameters does he monitor during the composting procedure?

ANNEX 3

8. Risk of pathogens in animal faeces. The farmer could check with the provider that his animals are not suffering from any known disease (ask to see vet reports/results if necessary). This also gives an insight to neighbouring land use. How does the farmer protect his land from the animals producing the manure? Does he have adequate fencing? Is his farm at risk from run-off and does he consider the activities of the neighbouring farm before harvesting?

9. Risk of contamination by leakage of manure and contamination by pests/vermin. Is the storage area secure, clean and maintained? Is there pest control in operation?

10. Risk of contamination through irrigation water. Is the farmer satisfied that the water is of a minimum clean standard?

11. Timing and application of irrigation water is a risk. Drip feed irrigation is good for strawberries but care will need to be taken to ensure that the source of irrigation water is clean, and the timing of irrigation with respect to harvesting should also be considered. The equipment should be clean and in good condition to avoid leaks and contact with fruit.

12. Risk of contamination from workers. Is unsuitable fruit separated and disposed of properly?

13. Risk of damage to produce and contamination from packaging. Are the packs suitable for use and clean? Badly designed packaging could damage the fruit and increase the chances of contamination. In this case, they are single use so should be clean, but the supplier should be reliable and the farmer could ask for documentation indicating whether they are food grade etc. The holes in the packaging should allow the cooling air to penetrate quickly into the crop. The primary purpose of chilling is to prolong shelf life as much as possible although it will also prevent proliferation of enteric pathogens on the surface of the fruit.

14. Since no washing is being done here, the farmer would need to ensure that all previous stages in the production were controlled and produced using good agricultural practices.

15. Risk of contamination from trailer. Is the trailer only used for transport of strawberries or similar products? Is it clean? Does it provide shade for the strawberries to protect them from heat/sun/birds etc?

16. Cross contamination risks. Is the storage facility clean and protected from pests and other sources of contamination? Besides controlling vermin, other pests such as flies should be controlled. Is the cooling equipment clean and how does the producer know that the correct temperatures are being achieved?

ANNEX 3

17. Cross contamination risks. Are the vans clean and only used for the transportation of his strawberries or similar products? If multiple loads, is there adequate segregation between the products and have steps been taken to minimise cross contamination risks? Does the transport company monitor the temperature in the vans and have a correction procedure in place if the temperature rises?

ANNEX 4A

ANNEX 4A: BUSINESS DETAILS & INSPECTIONS SUMMARY

Primary Production Food and Feed Hygiene Inspection:

[Regulation \(EC\) No. 852/2004](#), on the hygiene of foodstuffs

[Regulation \(EC\) No. 183/2005](#), laying down requirements for feed hygiene

NOTE: Fields marked with * are mandatory and are required either for the completion of SPPOCS or of the report, as required by Annex 6 to the Food and Feed Law Codes of Practice (Intervention Report)

*Officer Name:		*Security & Access				
*Date and time of visit:						
*FARM/TRADING NAME:		*Farm Assurance Scheme(s) and what they apply to:				
*NAME AND POSITION OF PERSON SEEN:						
*ADDRESS:		Any Linked Premises/ SOA/Grazing or other associated holdings?				
*TEL NO.						
MOBILE NO.		Seasonal business? Provide details				
Email/website:		Unable to carry out inspection (reason):				
*Holding Number (CPH)		LA Reference number				
Reason for Visit (tick✓):	Routine	Complaint	Revisit	Trader Request	Home Authority Referral	Other

Date of last visit:		Risk rating:	
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ANNEX 4A

PRIMARY PRODUCTION ACTIVITIES

*Premises Type	Tick✓ Below	Comments
Livestock		
Arable		
Horticulture/Vegetable growers		
Mixed – predominately livestock		
Mixed – predominately arable		
Mixed – predominately horticulture		
Other (name)		

Areas inspected	
Documents/records examined	
Key points, discussed during inspection	
Action to be taken by local authority	

ANNEX 4A

NON-PRIMARY PRODUCTION

Please provide details of any non-primary production activities taking place on farm:

COMMENTS

Please provide any other comments:

ANNEX 4B

ANNEX 4B: CHECKLIST

Primary Production Food and Feed Hygiene Inspection:

[Regulation \(EC\) No. 853/2004](#), on the hygiene of foodstuffs

[Regulation \(EC\) No. 1831/2003](#), laying down requirements for feed hygiene

✓	×	n/a	Observations
1. General Food Law			
Knowledge of product withdrawal procedures			
Traceability in place – from suppliers			
Traceability in place – to customers			
2. General Facilities			
Structures and equipment clean: free from contamination (foreign materials, muck etc)			
Construction and design allows for cleaning to take place			
Vehicles clean			
Storage areas clean and dry			
Lights and windows shielded			
3. Feed Storage			
Feed storage – cleaning & disinfection procedures in place			
Do livestock have access to these areas?			
Is there any risk of contamination from non-feed ingredients e.g. medicines, plant protection products?			
4. Fields and Grazing			
A. For grazing			
Has a risk assessment been carried out with regards to previous use of field?			
Has grazing ban been observed?			
Evidence of contamination?			
B. For growing crops			
Has a risk assessment been carried out with regards to previous use of field?			

ANNEX 4B

	✓	x	n/a	Observations
5. Cleanliness of Animals				
Clean environment – good ventilation and drainage				
Understanding about need for clean livestock prior to slaughter				
Evidence of dirty animals				
6. Water				
Source of water supply – private or public				
Has a risk assessment of the water source been done?				
Cleanliness of drinking water systems				
Water harvesting system in use? Has a risk assessment been done?				
7. Staff Hygiene and Training/Knowledge				
Hand washing/cleansing facilities				
Knowledge of hygiene principles				
Protective clothing				
Understanding of staff exclusion				
Adequate training/supervision				
For RTE foods – personal hygiene policy?				
Staff and management competent				
8. Pest Control				
Evidence of pests / animals				
Condition of buildings and maintenance – sufficient to exclude pests?				
Areas around buildings clear				
Areas clean and tidy to prevent pests				
Pest control contractor used?				
If internal pest management system used – is it effective? Are staff competent?				
Contamination risk from bait boxes?				
Cats used for rodent control? Do cats present a risk by having access to produce stores etc				

ANNEX 4B

	✓	x	n/a	Observations
9. Waste and Hazardous Substances				
A. General Waste				
Waste stored/handled safely & securely				
Adequately labeled waste containers				
Liquid waste – is it secured?				
Does transportation of waste around Farm prevent/reduce risk of contamination?				
Is special waste disposed through an Approved route. Are records available?				
Are waste contractors licensed?				
B. Animal By-Products				
Is disposal of dead animals appropriate and recorded?				
Is slurry and manure stored appropriately?				
If compost/sewage sludge used on farm, is it stored and used appropriately? Are conditions of use met? Are records kept?				
10. Zoonotic Disease				
Are the conditions suitable for preventing or reducing the risk of zoonotic disease?				
Is there evidence that veterinary advice followed?				
Is there knowledge that notifiable disease must be reported?				
11. Plant Disease				
Are farmers aware of the measures that need to be taken to prevent fusarium and ergot?				
12. Relevant Analysis				
Have any samples been taken that are relevant for food/feed safety and has appropriate action been taken?				
13. Additives and Medicines				
Correct use of vet medicines and withdrawal periods observed?				
Are the products registered and from a registered supplier?				

ANNEX 4B

	✓	x	n/a	Observations
Are treated animals identified?				
Are medicines and medicated feed kept separate and labelled?				
14. Plant Protection products				
Correct use of plant protection products?				
Are plant protection products kept separate and labelled?				
15. Packaging of Feed				
Are co-products free from contamination?				
Are container/bags clean and appropriately labelled?				
Is the condition and storage of packaging suitable?				
Is the condition of re-used packaging suitable?				
16. Record keeping				
Livestock				
Nature and origin of feed records				
Vet medicines usage and withdrawal periods				
Disease occurrence that affects food				
Analysis reports / results				
Waste disposal records				
Application of organic fertilizers/composts etc to pastures				
Other relevant records				
Are records easily retrievable and in an appropriate manner?				
Arable				
Use & disposal of PPP and biocides				
Occurance of disease and pests				
Analysis reports / results				
Pest control				
Other relevant records				
Are records easily retrievable and in an appropriate manner?				
Feed				
Nature and origin of feed records				
Use & disposal of PPP and biocides				
Occurance of disease and pests				
Analysis reports / results				

ANNEX 4B

Other relevant records				
Are records easily retrievable and in an appropriate manner?				

*Officer Name (in capitals):.....

*Signature:..... *Date:...../...../.....

*Designation of Authorised Officer:.....

*Contact details of Authorised Officer:

*In case of dispute, please contact:

.....

.....

Local Authority name and address:

.....

ANNEX 4C

ANNEX 4C: INSPECTION OUTCOME SUMMARY

Primary Production Food and Feed Hygiene Inspection:

[Regulation \(EC\) No. 853/2004](#), on the hygiene of foodstuffs

[Regulation \(EC\) No. 1831/2003](#), laying down requirements for feed hygiene

NOTE: Fields marked with * are mandatory and are required for the completion of SPPOCS

Inspection Outcome Summary – Food Hygiene

Criteria	Possible categories	Tick the category that applies
*Annex I compliance	<ul style="list-style-type: none"> • Not applicable • Not yet determined • Pass • Substantially meets requirements • Fail • Serious failure in compliance 	
*Other intelligence	<ul style="list-style-type: none"> • Positive • Negative • 	
*Risk rating	<ul style="list-style-type: none"> • 2% • 25% 	
*Report to business date		

ANNEX 4C

Inspection Outcome Summary – Feed Hygiene

Criteria	Possible categories	Tick the category that applies
*Annex I compliance	<ul style="list-style-type: none"> • Not applicable • Not yet determined • Pass • Substantially meets requirements • Fail • Serious failure in compliance 	
*Annex III compliance	<ul style="list-style-type: none"> • Not applicable • Not yet determined • Pass • Substantially meets requirements • Fail • Serious failure in compliance 	
*Other intelligence	<ul style="list-style-type: none"> • Positive • Negative • 	
*Risk rating	<ul style="list-style-type: none"> • 2% • 25% 	
*Report to business date		

ANNEX

ANNEX 5: EXAMPLES OF ACTIVITIES THAT WOULD FALL WITHIN THE SCOPE OF ANNEX II OF [REGULATION \(EC\) NO. 183/2005](#)

Annex II and procedures based on HACCP apply to these activities:

- Convection drying (using gas or oil) of cereals
- Mixing of feed using additives⁵ (except silage additives), and pre-mixtures containing such additives, even if for use on own holding. This would not include complementary feeds and complementary mineral feeds which are within the scope of Annex I.
- Farms mixing feeds with non-antibiotic growth promoters, coccidiostats and histomonostats (including complementary feeds, containing these additives). These are subject to approval by the Animal Medicines Inspectorate (AMI), which is part of the Veterinary Medicines Directorate.
- Preparation of complementary and/or compound feed for onwards supply to other holdings

⁵ Most common additives used on farm include urea, preservatives such as propionic acid, vitamins A and D, trace elements (such as copper, selenium, zinc etc). The FSA has agreed that, on the basis of proportionality it would be sufficient for farmers to apply the principles of HACCP and meet the requirements of Annex II of EC Regulation 183/1005, only to activities relating to the use of such preservatives, and not to all other on-farm activities when the conditions of Annex I of the Regulations would apply.

ANNEX

ANNEX 6: WILD GAME

Wild game is defined in [Regulation \(EC\) 853/2004](#) as:

“Wild ungulates and lagomorphs, as well as other land mammals that are hunted for human consumption and are considered to be wild under the applicable law in the Member State concerned, including mammals living in enclosed territory under conditions of freedom similar to those of wild game”.

Although some game animals may live in enclosures, they may still be classified as wild. Wild game must be killed by hunting if it is to be supplied for human consumption.

Wild game animals may therefore be provided with food in order to ensure that the animals do not stray beyond the boundary of the estate. In this case, the estate is considered a food and feed business operator (primary producer).

The hunting of wild game is considered a primary production activity. Hunters supplying primary products are subject to the same exemptions as other primary producers concerned with the supply of small quantities direct to the final consumer to local retailers who supply the final consumer.

For more information, please refer to the Wild Game Guidance:

<http://www.food.gov.uk/foodindustry/meat/wildgameguidance>

ANNEX

ANNEX 7: OTHER SOURCES OF INFORMATION

Please note that any guidance and links to guidance that are referenced throughout this document are correct at the time of publication. Users should be aware that the referenced guidance may be subject to change.

1. Cross Compliance

<http://www.scotland.gov.uk/Topics/Agriculture/grants/Schemes/ccompliance>

2. **“Guidance for Enforcement Bodies: Enforcement of Hygiene Regulations on Egg Production Sites in the United Kingdom”** is available on the Food Standards Agency website:

<http://www.food.gov.uk/foodindustry/guidancenotes/hygguid/eggenforcement>

3. **“Managing Farm Manures for Food Safety - Guidelines for Growers to Reduce the Risks of Microbiological Contamination of Ready to Eat Crops”** is available on the Food Standards Agency website:

<http://www.food.gov.uk/multimedia/pdfs/manquidfinaldraft.pdf>

The guide provides information on how to reduce the risks of contamination before and after crop establishment, during the growing season and after harvest, as well as general management.

4. Fresh Produce - For further information on production of fresh produce, refer to the Risk assessment web based tool (FSA/HDC) and HDC/FSA Factsheet 13/10 Monitoring Microbial Safety of Fresh Produce and the Guide to Good Hygiene Practice – Fresh Produce 2009 (Fresh Produce Consortium)

<http://www.safeproduce.eu>

<http://www.freshproduce.org.uk/>

ANNEX

ANNEX 8: CONTACTS

Animal Health	For details of area offices:- http://www.defra.gov.uk/animalhealth/about/contact-us/officemap.html
Food Standards Agency	Jacqui Angus, Food Standards Agency, Scotland Tel: 01224 285175 Email: Jacqui.angus@foodstandards.gsi.gov.uk
Pesticides Safety Directorate (Health & Safety Executive)	http://www.pesticides.gov.uk/corporate.asp?id=74
Scottish Environment Protection Agency (SEPA)	For details of area offices: http://www.sepa.org.uk/about_us/contacting_sepa.aspx
Scottish Government, Animal By-Products	The Scottish Government , Rural and Environment Directorate Animal Health & Welfare P-Spur, Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD , Tel: 0300 244 9833
Scottish Government Rural Payments and Inspections Directorate (SGRPID)	For details of area offices:- http://www.scotland.gov.uk/Topics/farmingrural/Agriculture/AOcontacts/contacts
Veterinary Medicines Directorate	Woodham Lane, New Haw, Addlestone, Surrey KT15 3LS Email: recep@vmd.defra.gsi.gov.uk Telephone 01932 336911