



London Port Health Authority (LPHA)

FOOD ENFORCEMENT SERVICE PLAN 2013 / 14

1 SERVICE AIMS & OBJECTIVES

1.1 Aims & Objectives

The Common Council of the City of London Corporation is the Port Health Authority for the district of the Port of London. The jurisdiction is set out in the London Port Health Authority Order 1965.

The Port Health and Environmental Services Committee is responsible to the Court of Common Council for the delivery of a wide range of services, including Port Health, which it does through the Department of Markets and Consumer Protection.

The Mission of the Port Health & Public Protection Division of the Department of Markets and Consumer Protection is to advise, educate, influence, regulate and protect all communities for which the Department has responsibility in the fields of Environmental Health, Port Health, Trading Standards, Licensing and Animal Health, at all times seeking value for money in the activities it undertakes so that the highest possible standards are achieved cost effectively.

The Mission Statement of the LPHA is :- "To deliver a high quality, accessible and responsive service to protect, enhance, and improve the public, environmental, and animal health of the Tidal Thames and Lower Medway."

To contribute in achieving our goals we have professionally trained staff who possess specialised knowledge in the wide range of activities undertaken by the Port Health Authority and continue to advance our service via developments in technology.

1.2. Links to Corporate Objectives & Plans

The City of London's vision is:-

"The City of London Corporation will support and promote the City of London as the world leader in international finance and business services, and will maintain high quality, accessible and responsive services benefiting its communities, neighbours, London and the nation."

The City Together Strategy 2008 – 2014 currently has five themes, of which two are relevant to the Port Health Service. These are:

- ...supports our communities
- ...protects, promotes and enhances our environment

City of London's Corporate Plan 2011 - 15 has three Strategic Aims, the one relevant to this Plan is:

- To provide valued services to London and the nation.

The City Together Strategy, Corporate Plan, Local Development Framework and other strategic plans are the "Golden Thread" which runs through all of the Departmental Business Plans, Divisional Plans and individual performance appraisals to deliver a high quality service. Consequently, the Business Planning process and this Plan are linked, so that the work carried out by LPHA at the ports in its area supports and protects the local and national community.

Monitoring of the Plans is carried out using established reporting arrangements linked to the Department of Markets and Consumer Protection with financial, legal and support services at the City's central London offices.

This includes pre arranged Performance Monitoring meetings where the data is reviewed with the Director of Markets and Consumer Protection, and where necessary, remedial measures can be implemented as appropriate to deal with any shortcomings identified.

2 BACKGROUND

2.1 Profile of the Local Authority/Port Health Authority

LPHA is responsible for a district, which extends for 94 miles (150 kilometres) along the tidal Thames from Teddington Lock to the outer Estuary. It includes the lower reaches of the River Medway, while to the north it encompasses the River Roach and southern part of the River Crouch.

The area for which LPHA is responsible includes the ports of Tilbury, Thamesport, Sheerness in addition to the various docks and dockland areas which have now been redeveloped including London City Airport

The Port of London is the largest mixed cargo port in the United Kingdom. During 2012 it handled 43.7 million tonnes of cargo. The overall tonnage of goods handled through the Port in 2012 reduced, mainly because of the closure of Coryton Refinery with a reduction of 10 million tonnes of oil imports. Volumes of other cargoes were also lower than the previous year. However, there was a 2% increase in unitised cargo to 14.8 million tonnes, and cereal increased to 739 000 tonnes, a 35% improvement.

In addition, Ports on the Lower Medway handle around two million tonnes of general cargo including some fruit. This trade is in decline and the Port of Sheerness had ambitious plans to develop the port for wind turbine manufacture. A previous business partner withdrew from this venture although the port is still following up possibilities.

The Port of Thamesport has also suffered from a decline in trade due to the withdrawal of significant shipping lines. This has affected the throughput of imported food and now only one major shipping line continues to call at the port.

The main activity for LPHA is the checking of food imports from countries outside the European Union. Cargo arrives from many areas of the world including South America, Africa, Australia, New Zealand, India, the Far East, the Mediterranean, USA, and Canada.

More than 130 000 consignments of food arrived at the ports of Tilbury and Thamesport during 2012. Approximately 120 000 of these were Products Not of Animal Origin (NAO) with remaining 10 000 being Products of Animal Origin (PoAO).

The overall numbers of imported food consignments compared to the previous year have increased, however, as in previous years of a decline in the number of PoAO consignments the trend continues.

Looking forward, predictions indicate there will be growth in global container shipping; the London Gateway Port that is under construction is positioned to take advantage of this opportunity with the new port on track to commence trading in the last quarter of 2013.

In addition to its imported food responsibilities, LPHA also has responsibility for Animal Feeding Stuffs, Shellfish Classification, Infectious Disease Control, Pollution Control and Pest Control.

Food Hygiene and Food Standards enforcement is carried out in approximately 160 food premises, including floating restaurants, Thames pleasure vessels as well as on board visiting ships and premises at London City Airport.

Shellfish classification forms the main element of the work carried out by the Lower River Team as there are 14 shellfish beds within the Authority's area and five beds monitored on a contractual basis for Swale Borough Council.

Infectious disease control and drinking water quality monitoring are also significant parts of the work undertaken by the Authority, in the Dock areas, on the River and at London City Airport.

2.2 Organisational Structure

The current Organisational structure is attached in Appendix I.

The Assistant Port Health Services Director, under the direction of the Port Health and Public Protection Service Director is responsible for the delivery of the Port Health Function.

LPHA employs Port Health Officers, Official Veterinarians (OVs), Technical and Support staff to deliver a wide range of services. Additional legal, financial and administrative support is available through the Port Health and Public Protection Division and other City of London Departments.

A review of the organisational structure is being carried out to prepare the Authority for the opening of the London Gateway port due in November 2013. The structure may change following staff and union consultation which is part of the standard procedure where restructuring is proposed.

2.3 Scope of the Food Service

LPHA has a legal duty to provide the following:

- Undertake checks on imported food consignments entering the Port to ensure fitness for human consumption and compliance with relevant EU and UK legislation.
- Undertake documentary, identity and/or physical checks of consignments of imported products of animal origin.
- Undertake documentary, identity and/or physical checks of consignments of imported products not of animal origin.
- Sample foodstuffs for chemical analysis and microbiological examination.
- Undertake appropriate checks on consignments of imported animal feedingstuffs as dictated by the requirements of the Official Feed and Food Control Regulations
- Enforce legislation relating to Contaminants in Food.
- Enforce legislation relating to import and control of Organic Produce.
- Respond to reports of food poisoning and infectious diseases and investigate and control such incidents in association with the Health Protection Agency.
- Control of shellfish harvesting areas including issue of Movement Documents and sampling for classification and biotoxin analysis.
- Act as the co-ordinator for Local Action Groups (LAGs) to follow up the cause of poor analytical results from sampling and to pass on information relating to incidents involving shellfish.
- Check potability of water supplied to vessels.
- Undertake programmed and non-programmed inspections of Thames passenger vessels, floating restaurants, aircraft and merchant ships including passenger liners, fishing vessels and other food premises within the district to monitor and promote a high standard of food safety and hygiene and ensure compliance with food safety legislation.
- Participate in the Food Hygiene Rating Scheme (FHRS).
- Promoting Smoke Free Legislation, monitor compliance and intervene when necessary in response to complaints regarding contraventions.

Other responsibilities that are delivered alongside the food service include:

- Enforcing of Rabies prevention legislation.
- Providing Port Health Training Seminars and Practical training for Student Environmental Health Officers and Official Veterinarians. The Tilbury Border Inspection Post (BIP) is recognised by Defra / Animal Health & Veterinary Laboratories Agency (AHVLA) as a training centre.
- Carrying out the enforcement of Pollution Prevention and Control legislation acting as Regulator under the Environmental Permitting Regulations for Part A2 and Part B Processes.
- Controlling statutory nuisances including the investigation of complaints with regard to noise and odour emissions from certain port industries.

- Monitoring of refuse handling on the river and waste control procedures in port for both International Catering waste and Inspection waste from the Border Inspection Post examination facilities.
- Inspecting the Port Health Authority area and board ships to check sanitary conditions, issue certificates or take appropriate action in accordance with the International Health Regulations and domestic legislation.
- Liaising with Government Departments and Agencies
- Co-operating with Port Health Authorities nationally and internationally to maintain and improve service delivery.
- Participating at Technical Committees relevant to Port Health.

The Port Health Service does not use external contractors to provide any part of the Food Service.

2.4 Demands on the Food Service

2.4.1 Imported food

LPHA has offices at Tilbury and Thamesport where the majority of work covered relates to imported food control, although it is anticipated that trade will transfer to the London Gateway Port.

Contact details and office hours are available on our website
<http://www.cityoflondon.gov.uk/porthealth>

Veterinary checks for products of animal origin imported from Third Countries are carried out at the two approved Border Inspection Posts (BIPs) under LPHA control :

- Tilbury GBTIL1 and
- Thamesport GBTHP1

Checks under Regulation (EC) No 669/2009 for “High Risk” products not of animal origin imported from Third Countries are carried out at two Designated Points of Entry(DPEs) :

- Tilbury
- Thamesport

Throughput data for LPHA is shown in the table below :

2012 Throughput	
	Total
Total PoAO Consignments	10082
Total PoAO Samples	405
Total Non PoAO Consignments	120155
Total Non PoAO Samples	628

The throughput of food imported through each of the LPHA’s ports is subject to many external factors including seasonal trade patterns and can fluctuate year to year, or month to month. This increases the demand for flexibility within the workforce and

requires high levels of commitment from the staff to meet the demands on the service.

There is a constant expectation from the trade for their consignments to be cleared as quickly as possible. Delays result in additional costs and disruption to their business which LPHA recognises, and has a business plan performance indicator to measure turnaround time. Where containers have to be detained queries on documentation are processed as quickly as possible; samples are submitted efficiently and there are service level agreements with the laboratories to ensure delays are kept to a minimum.

Changes to legislation place considerable demands on the service; they can be imposed at short notice to respond to a particular set of circumstances.

Current controls include checks on:

- Japanese products for radiation,
- strawberries from China for norovirus and hepatitis
- presence of Genetically Modified (GM) material in rice and rice products from China
- pesticide residues in a range of imported products from a number of different countries

The legislation relating to High Risk non-Animal Origin products (NAO) is reviewed on a quarterly basis at EU level. The changing requirements for the examination and sampling of this food often requires short notice changes in working patterns. Close liaison with the laboratories is essential because of the potential impact the change will have on them. Insufficient laboratory capacity is a concern which can cause considerable delays to imports.

The High Risk controls have altered the balance of enforcement activity related to other NAO not covered by the controls. Routine surveillance is carried out at an appropriate level based on risk assessment of imported cargo, changes the High Risk controls may remove certain products from the list or reduced the level of checks, thus freeing resources for routine surveillance.

Legislation was introduced in 2010 relating to the sustainability of fishing to prevent, deter and eliminate the import of illegal, unreported and unregulated (IUU) fishery products. The process of checking catch certificates and accompanying documentation is time consuming as a considerable number of consignments have multiple certificates relating to the products being imported. LPHA has good liaison arrangements with the Defra unit responsible for this area of work.

The process of Veterinary checks comprises documentary and identity checks of all consignments. Physical checks of a fixed percentage of each category of product as required in Commission Decision 94/360 are carried out. LPHA is audited by Defra (AHVLA) against these percentage checks. Internal reports are prepared and circulated monthly and circulated to staff to maintain correct levels of checks. In addition, AHVLA are changing their auditing arrangements with greater emphasis on internal monitoring and external verification by AHVLA.

As part of the physical checks, the OVs at the LPHA's BIP's have developed, in line with DEFRA guidelines, an annual sampling plan. The aim is to sample between 1 and 10% of all the physical checks carried out. For this purpose there is a sampling

matrix that is produced quarterly anticipating the number of samples that need to be taken in that quarter. This matrix is reviewed quarterly in order to make the necessary adjustments in accordance with any throughput variations. The samples are taken at random at the time of the physical inspection of the consignments. Samples taken may contribute to the National Sampling Plan coordinated by AHVLA

There are other samples that are taken in the course of physical exams as requested at the discretion of other organisations such as the FSA and The Veterinary Medicines Directorate.

Additional sampling activity may arise from Emergency Provisions that might be implemented due to Public or Animal health concerns that arise from time to time.

BIP facilities inspections are carried out once a month to evaluate hygiene and maintenance of the premises and review progress on outstanding issues. BIP operators are provided with reports and regular liaison meetings are held to discuss progress on maintenance and operations.

LPHA relies on the information management system that was purchased from Suffolk Coastal District Council (SCDC), the Port Health Authority for the port of Felixstowe. They have developed the system known as PHILIS (Port Health Interactive Live Information System) to streamline the collection and processing of imported food information.

This has streamlined administrative processes and enabled electronic data capture. There are links within the system to other IT systems, for example those operated by the Laboratories we use, so data relating to samples can be transferred. PHILIS enables the preparation of performance statistics for official returns and management data.

Longer term development work continues in liaison with SCDC, in the short term the aim is to introduce mobile working, this will enable recording of inspections using hand held devices cutting out paper based information recording.

2.4.2 Food Hygiene and Standards

In addition to the LPHA's based locations the Authority also has offices based on the River Thames at Charlton and Denton. In respect of Food Hygiene and Standards, the demands on LPHA arise principally from the following:

Food Hygiene Enforcement

LPHA has statutory responsibilities relating to approximately 160 Food premises within its area. These include Thames passenger vessels, permanently moored floating restaurants, public houses, yacht and boating clubs, premises at London city Airport and at Tilbury, Thamesport and Sheerness Docks.

In liaison with City of London colleagues, LPHA operates the Food Hygiene Rating Scheme (FHRS).

Cruise Vessels

LPHA receives approximately 100 arrivals per annum at its cruise terminals and berths on the River Thames. This includes repeat visits by the same ship. The vessels are boarded and inspected on, or shortly after, arrival. The boarding may be

carried out either from the cruise terminal if the ship is alongside, or by means of an LPHA launch.

As well as food safety and hygiene considerations, ship boarding deals with other matters covered by the International Health Regulations for ship sanitation and includes inspections of the vessels for public health issues including potable water quality, food safety and hygiene, infectious disease control, refuse disposal and control, sewage treatment and disposal, cleaning schedules, records of illness on board and general living conditions.

Most cruise ships demonstrating non compliance are re-visited within two months or on next arrival. It should be noted that not all cruise vessels are boarded at each arrival; the decision is based upon a risk assessment by the Port Health Officer prior to the arrival.

Aircraft

Checks are undertaken on aircraft using the Public Health (Aircraft) Regulations. The Food Safety (Ships & Aircraft) (England & Scotland) Order 2003 is in force and has implications for food safety and potable water on board aircraft. Supplies of water at London City airport are regularly sampled and analysed. In addition to the controls on water supplies, regular inspections of the outside catering units and the vehicles delivering the foods for aircrafts are performed.

Vessel Arrivals

The Authority's officers board vessels arriving within its district to undertake inspections under the Public Health (Ships) Regulations and to issue Ship Sanitation Certificates under the International Health Regulations. Such vessels include tankers, bulk carriers, cruise vessels, refrigerated cargo freighters, container vessels, ro-ro ships and passenger vessels.

The Food Safety (Ships & Aircraft) (England & Scotland) Order 2003 also applies sections of the Food Safety Act to vessels arriving in port, including an amended definition of premises, food hygiene regulations and temperature control regulations.

LPHA works closely with other UK PHA's to enforce standards on vessels, there is direct communication to ensure "problematic" vessels are tracked around the UK.

Products of Animal Origin (POAO) and Border Inspection Posts (BIPs)

The service operates BIPs at the ports of Tilbury and Thamesport. The Inspection Facility at the London Gateway Port is being developed and liaison meetings with the Port Operator are held to make sure that the legislative requirements will be met and the Facility will be fit for purpose.

Non Animal Origin (NAO) Products

Port Operators are required to provide facilities and assistance to LPHA to ensure the control of all NAO food.

Particular facilities and equipment are required for the inspection of products subject to "High Risk" controls and these facilities have to be present to obtain Designated Point of Entry (DPE) status under the regulations.

Much of the legislation sets out specific conditions relating to the inspection and sampling of NAO products, LPHA staff undertaking the examinations ensure that all relevant procedures are followed during the process.

Shellfish Harvesting

LPHA is the Food Authority for the tidal Thames with regard to the harvesting of shellfish throughout its area. Sampling for classification purposes and biotoxin monitoring is carried out. Sampling for Swale Borough Council is carried out on a contract basis, with any follow up enforcement activity being carried out by Swale EHOs.

Support for National Initiatives

LPHA participates in annual sampling initiatives organised by central government. It also supplies regular feedback on consultations from governmental agencies. Successful bids were made for additional funding from the Food Standards Agency amounting to approximately £36,000 for sampling Animal Feed and Imported food in 2012/13.

Support for International Initiatives

LPHA provides expert advice to international agencies and trade organisations. In 2012 hosted a number of visits from delegations including collaboration with Better Regulation Delivery Office (BRDO) for an international study tour of the enforcement approach adopted in the UK.

The programme of training under the EU Better Training for Safer Food initiative has resulted in staff attending specific training based in other member states relating to both POAO and NAO

LPHA participates in meetings held to exchange information and to promote good practice between the larger EU BIPs as part of the Multilateral BIP meetings programme. In addition, LPHA has strong relationships with colleagues in Holland, and exchange visits are undertaken with Port of Rotterdam.

2.4.3 Statistical returns

LPHA currently produces official and performance statistics principally using PHILIS, however, there remains a need to use other data sources to complete particular returns, specific examples include:

- Local Authority Enforcement Monitoring System (LAEMS) – data is collated at each port office and forwarded to the City of London’s designated LAEMS return officer in M&CP Support Services. Two returns are provided by the LPHA one for Imported Food the other for Food Hygiene and Standard
- Bespoke returns – all other requests for data collection are typically collated from hardcopy or electronic sources within LPHA; for example, shellfish related data.

Returns are verified by Senior staff before being reported.

2.5 Enforcement Policy

The City of London is committed to the principles of the Regulators Compliance Code, a statutory Code for all regulators. LPHA as part of the Department of Markets and Consumer Protection has a Policy Statement on Enforcement approved by the Port Health and Environmental Services Committee.

The Better Regulation Delivery Office (BRDO) has launched a competency framework of professional standards of competency for regulators. LPHA makes reference to the Regulators Development Needs Analysis for relevant port health staff and implementing any training needs identified through the City of London Appraisal process which applies to all employees.

3. SERVICE DELIVERY

Performance

The Port Health Business Plan includes the following Business Plan targets related to this plan:

Port Health

- 95% of consignments of Products Of Animal Origin (POAO) that satisfy the checking requirements are cleared within five days
- 95% of compliant consignments of non-animal origin cleared within five days
- 172 shellfish samples collected (14 beds / 12 inspections each per annum)
- To achieve 96% of scheduled food hygiene inspections.

100% of all manifests are checked and coded for statistical purposes and appropriate detentions are placed on consignments depending on the checks required.

Under Imported Food legislation levels of Documentary, Identity and Physical checks are set by the EU for POAO and High Risk NAO. The checks are product and country specific with varying percentage checks.

Other NAO is subject to checks based on a local risk assessment.

When drawing up its annual Service targets, LPHA has regard to the current and prospective strategies of key agencies e.g. FSA, Defra and Public Health England (PHE).

Technology

LPHA continually seeks IT solutions to improve its performance and delivery and is working closely with the City IS Division on an improvement programme linked to the opening of the London Gateway port.

PHILIS has fundamentally changed the operation of the port health service. A review of ISO systems and procedures is in progress to identify and document changes to

procedures to ensure consistency of approach throughout the Authority, and is essential in preparation for the opening of the London Gateway port.

Quality Assurance

LPHA operates under an ISO 9001:2000 accredited system; this has been specifically designed to complement the LPHA regulatory service. Work procedures have been developed to provide consistency in routine tasks e.g. disposal of rejected goods, service of notice, identification of imports etc. The standard does not reproduce official guidance or codes of practice; however, it refers to appropriate documentation where applicable.

It is acknowledged that the ISO standard does not guarantee the application of correct legal responsibility conferred on the Authority; the ISO system ensures consistent documentation and operational procedures. Strict legal enforcement is achieved only through peer and performance review.

LPHA retains two distinct types of information – hardcopy and electronic. Most data is held in electronic format, this includes manifest records, official import notifications, food hygiene inspections and imported food checks. Hardcopy data includes copies of Legal Notices and Health Certificates.

3.1.1 POAO

POAO inspections are carried out at our approved Border Inspection Posts at Tilbury and Thamesport. Port Health carries out regular inspections of its BIP facilities to assess compliance with the requirements of Commission Decision 2001/812. Facilities are inspected once a month and the resulting inspection reports are forwarded to the respective operators at each port. Follow up action is pursued at the next inspection or sooner for items identified as requiring urgent attention.

3.1.2 Food and Feedingstuffs Premises Inspections

These inspections follow the Port Health and Public Protection Division Enforcement Policy.

Food businesses due a Food Hygiene inspection and rated “broadly compliant” will receive an inspection in line with Food Standards Agency guidance. Food Standards inspections are carried out simultaneously if this is appropriate.

3.1.3 Authority Premises Profile

The Authority currently consists of two distinct “divisions”: -

1. Tilbury and Upper Thames
2. Thamesport and Lower Thames

At the ports of Thamesport and Tilbury there are dedicated offices and purpose built inspection facilities for the examination of imported foods. The Border Inspection Post (BIP) and Designated Point of Entry (DPE) facilities under LPHA control are equipped to enable inspection of imported foods in accordance with statutory sampling plans and comply with good hygienic practice.

The number of inspections/revisits to food premises is in accordance with the FSA risk rating scheme for food premises.

3.1.4 Specific Import Controls

Numerous specific controls are in place associated with High Risk Non Animal Origin Products and Special Measures Regulations to deal with persistent problems. Details of the legislation are maintained in the ISO system and are updated regularly.

Information regarding new legislative requirements and training updates is circulated via a local area network. Food, Health & Safety and Environmental related information is posted by City colleagues. Specific Port related information is circulated by the Senior Port Health Officers or one of the designated sub-groups within the Port Health Authority.

Rapid Alert notifications and Food Hazard warnings are circulated through the port by a designated officer. In relation to Rapid Alert System for Food and Feed (RASFF) reports, the specific officer reviews the summary and highlights information related to trade patterns usually experienced by LPHA. The selected information is shared and its distribution is tracked via email. Information regarding EC Directives, Decisions and Regulations is also available to all staff via the Guidance and Regulatory Advice on Import Legislation (GRAIL) database

as a first point of call but many officers refer to local copies of more frequently accessed legislation.

3.1.5 Training

Each new member of staff undergoes a six month probationary period during which training appropriate to the post is provided. The probationer is monitored by their Supervisory Officer during their induction, with interim assessments at 2 and 4 months.

Training is delivered to ensure that staff are competent in all the main Port Health functions undertaken by the Authority. This includes Imported Food Controls relating to Products of Animal Origin and Non Animal Origin Food; Food Standards and Food Hygiene in land based premises and aboard vessels. There is an FSA requirement that Food Enforcement Officers undertake 10 hours food related Continuing Professional Development (CPD) per year.

Officers are required to undertake (CPD), this is detailed in each individual's Performance and Development Appraisal. In house training sessions and briefings are held to assist Officers to meet their CPD requirement.

3.1.6 Student Training

The Authority is committed to staff development and sponsors technical staff to undertake Environmental Health degrees. Currently three members of staff have completed BSc or MSc level qualifications and are in the process of obtaining professional qualifications. Two members of staff commenced the Degree course in 2012.

3.1.7 Expertise profile

LPHA's functions require specialised skills outside the remit of some normal Local Authority roles. Official Veterinarians, Port Health Officers and specialist support staff are employed to deliver the service.

To meet the demands of LPHA's profile, the staffing level are as follows:

Role	Activity
6 Official Veterinarians	Control of Animal Imports (other than fish), Meat Inspection and Audits, Animal Welfare
9 Port Health Officers	Control of Animal Imports (Fish), Control of High Risk Non Animal Imports, Control of All other Non Animal Imports, Infectious Disease Control and Ship Inspection, Pollution Control.
1.5 Environmental Health Officers	Food Hygiene and Standard's Inspection (including Cruise vessels), Pollution and Noise control, Water Sampling, Infectious Disease Control and Ship Inspection
2 Technical Officers	Water Sampling, Support for Organic Controls, Pest Control, Follow up and routine ship boarding
1 Technical Assistant	Pest Control, routine ship boarding and practical support.
9 Support Staff	Administration and practical support

3.1.8 Lead Officers

POAO (Non Fish)	Carlos Gracia
POAO (Fish) and Illegal, unregulated & unreported fishing (IUU)	Jo Purkiss
Non Animal Origin Food	Matthew Purkiss
Non Animal Origin Feed	Peter Markwell
Quality Manager	John Ambrose
Food Hygiene and Standards	Christine Connolly
Data Collection and IMS	Matthew Purkiss
Infectious Disease	Robin Catchlove
Environmental Protection	Robin Catchlove
Health and Safety (Internal)	Robin Catchlove
Pest Control	Peter Markwell
Water	Peter Markwell

3.2 Food and Feedingstuffs Complaints

LPHA follows corporate policy in relation to any complaints and has an internal target to provide a same day response to all consumer complaints on food matters, immediately if practicable.

LPHA receives no significant complaints regarding imported food however, where complaints are received the response follows corporate standards :

Email – response within 1 working day, full response within 10 working days

Letter – full response within 10 working days

Telephone – to be answered within 5 rings.

Complaints regarding the actual service provided by LPHA are recorded within the ISO System, an investigation is carried out and remedial action is taken where appropriate; this is followed up at the regular ISO Management Review meetings.

3.3 Primary Authority Principle

In accordance with LPHA policy, any importer not conforming or complying with any relevant import regulations will be referred to their Primary Authority i.e. the local authority with which it has a partnership to ensure conformance with legal requirements. LPHA will attempt to identify and contact primary authorities for referrals following adverse results or failed import conditions.

LPHA acts as the Primary Authority for one company but this relationship requires development and will be reviewed in 2013/14.

3.4 Advice to Business

LPHA provides advice and support to business in line with the Food Standards Agency Code of Practice. It maintains and builds on existing relationships encouraging businesses to meet their legal obligations and to develop best practice.

Detailed information on Port Health Services activities and practical advice on compliance with legislation is available on the City of London website www.cityoflondon.gov.uk/porthealth . The website is regularly updated to include any changes in legislation or procedure. Advice is separated to include statutory requirements and what is considered good practice.

Where LPHA cannot provide the advice sought, the enquiry will be referred direct to either a dedicated branch of the FSA (imported.food@foodstandards.gsi.gov.uk)or Defra (AHITChelmsford@animalhealth.gsi.gov.uk).

On a routine basis, information regarding new “controls” is sent direct to importers and agents. Where necessary, individual meetings are also held with agents, importers and other trade organisations to clarify and discuss legal and best practices.

A Business Plan objective is to provide an annual briefing at a central location to update the trade on current issues and to provide advice and support in the use of electronic systems such as Trade Control and Expert System (TRACES).

LPHA also provides a range of government advisory information on food hygiene, smoking in the workplace, communicable diseases, some of which are available in ethnic languages.

Information and advice on food safety and hygiene is also provided following an inspection. This specific advice clearly separates legal contraventions from best practices in accordance with the Food Safety Act 1990 Code of Practice.

3.5 Food and Feedingstuffs Inspection and Sampling

3.5.1 Sampling Plans

Imported foods including POAO, are monitored and inspected/sampled on a risk rated basis with regards to: Commission Decisions, Rapid Alert notifications, Food Standards Agency/DEFRA Guidance, Veterinary Medicines Directorate (VMD) sampling, product/importer history of compliance, previous adverse sample results, new products and random sampling. Products of Animal Origin are checked at the frequencies set by the European Commission for each country of origin.

Annual sampling plans are developed to take account of:-

- Throughput
- History of Compliance
- Emerging risk
- Results of previous year's programme
- Known Hazards
- Budgetary allocation
- Recommendations from central competent authorities
- Trade fluctuations

The main aim of the sampling programmes is to detect foods outside specific regulations which may be a threat to public or animal health.

3.5.2 Overall Objectives of Sampling

- a. To ascertain by chemical analysis and microbiological assay with regard to legislation and statutory requirements, the fitness, soundness or wholesomeness and the status of the food in regards to the efficacy of any heat treatment undertaken.
- b. To detect, by chemical analysis the presence of non-permitted or excess additives, toxic moulds, heavy metal contaminants, product authenticity, excessive residual levels of pesticides, herbicides etc. as well as any other potentially harmful substances.
- c. By way of food examination to detect the presence of pathogens; spoilage organisms and determine packaging integrity. The examination may also include organoleptic testing.
- d. Being the first point of entry into the EU, examination of food labelling is undertaken but not enforced; any discrepancies are passed onto the Local Authority where the goods are to be stored/distributed.

Budget Resources for 2013/14

The table shows the budgets for sampling activity

	Latest Approved
Port & Launches DDH50	Budget 2013/14
	£
Consultants Fees - POAO (Routine Sampling)	56,000
Consultants Fees - Non POAO (Routine Sampling)	52,000
Inspection Analysis Fees-POAO (Rechargeable)	20,000
Inspection Analysis Fees- Non POAO (Rechargeable)	28,000
Inspection Analysis Fees- Non POAO (Rechargeable) CED	50,000
Research/Advice/Information Fees - FSA Sampling	37,000

Shellfish Sampling	10,000
Plastic Kitchenware Sampling	1,000
Total	254,000

A considerable increase in sampling activity has taken place due to new legislation and emergency control provisions, particular note should be made to the budget available for sampling associated with Common Entry Document (CED) work. Sampling costs associated with this work are recoverable, however, this extra activity has an impact on the routine surveillance sampling work.

For several years the Authority has also benefited from grants from the Food Standards Agency for additional sampling and monitoring relating to imported animal feed and imported food monitoring.

3.5.3 Arrangements for Public Samples examined by the Analyst

For 'Detained Samples' the laboratory Service Level Agreement states results should be provided within five working days. The laboratory achieves this target in nearly all cases.

For 'Non Detained Samples' the Service Level Agreement requires completion and reporting within fifteen working days. Regular review meetings are held with the Analytical laboratories to discuss performance and consider other matters of mutual interest.

LPHA currently utilises the services of two analytical laboratories:
 Kent Scientific Services, West Malling, Kent
 Public Analyst Scientific Services Laboratories Ltd. Acton, London

3.5.4 Arrangements for Bacteriological samples examined by the Health Protection Agency

A Service Level Agreement exists between LPHA and the Public Health England (PHE) laboratory at Colindale. A financial allocation is made by PHE to LPHA for specific sampling to protect public health. The allocation is used for infectious disease outbreak samples, imported food checks and water samples. Once the allocation is used LPHA budgets must cover any additional sampling.

PHE turn-around times are set out in a Service Level Agreement based upon the time of receipt of sample to the time of reporting the results:

For Shellfish the results are given from 24hrs – maximum 3 days. (Usually 24hrs)

For water samples the results should be given in approximately 3 days

For other foods including detection of Listeria : 5 –7 days.

3.5.5 Sampling Policy

All samples are taken in accordance with LPHA Sampling Policy with selection, procurement and preparation of samples contained in LPHA Sampling Protocol.

For more details see www.cityoflondon.gov.uk/porthealth

3.5.6 Labelling

LPHA does not directly enforce The Food Labelling Regulations 1999 for imported foods however, when there are obvious errors or reports via the Public Analyst, the authority will contact the Local Enforcing body in the area from where the goods are to be stored or distributed.

3.5.7 Sampling Facilities

Each entry point at LPHA ports has its own dedicated examination/sampling facility. The facilities allow imports to be examined away from the original import containers and in a hygienically controlled area.

The specific equipment used at each facility is dependent on the types of product arriving at the port. Minimum standards of provision are set out in specific legislation and official guidance, typical items include:

Sample bags and jars, bag and container seals, sample receipts, sampling tape, scoops, scales, knives and chopping boards.

More specialist product dependent equipment includes:

Ladders, sample spears, vacuum samplers and sterile drum samplers

3.6 Control and Investigation of Outbreaks and Food Related Infectious Disease

The financial expenditure for this work is included in the overall budgets shown in Appendix 2

There is a statutory provision for the notification of food poisoning under Section 10 and 11 of the Public Health (Control of Disease) Act 1984. When health clearance (free pratique) is required, the Master of the vessel or Commander of the aircraft must complete a Maritime or Aircraft Declaration of Health. Prior notifications must be received within a specified period before arrival by radio, telephone, fax or email. Notifications of infectious disease have attracted media attention and to avoid criticism, LPHA has re-enforced requirements under this legislation.

The Service has an infectious disease protocol that has been drawn up in conjunction with Public Health England (PHE). In essence the information is recorded by the Duty Port Health Officer (DPHO) who will contact the Lead Port Health Officer (LPHO) and the Infectious Disease Co-ordinator. The LPHO will establish contact with the Infectious Disease Co-ordinator (IDC) immediately to assess the information and identify resource and staff requirements prior to initiating the investigation. This will include setting up an incident room close to the source of outbreak, with dedicated telephone lines, the interviewing and distribution of food poisoning questionnaires to crews and passengers.

A multi disciplinary approach to the investigating team consisting of Duty Medical Officer (DMO), LPHO IDC, Infectious Disease Nurse (IDN) and the Microbiologist/ Virologist is established with a team leader appointed from within the group to lead the whole investigation. The LPHO will ensure that the ship/ aircraft is isolated from normal traffic and there is no unauthorised embarkation or disembarkation. The investigating team will board the ship/ aircraft on arrival to identify and diagnose the illness, monitor, review and decide on control measures to contain the outbreak.

A hygiene inspection is undertaken by the LPHO applying Hazard Analysis Critical Control Point (HACCP) principles to the galley, provision stores and the affected areas as necessary. The LPHO will co-ordinate the collection of food, water, swab, vomit and faecal samples for further investigation and analysis in consultation with the IDC. The LPHO is responsible for the distribution of personal protective equipment to the investigating team and their assistants. The control measures may include a medical examination of the affected person/s, disinfection of the ship/ aircraft and the removal of contaminated food or water.

In the case of Norovirus or other airborne illness, an enhanced level of scrutiny will be given to the practises, procedures and documentation associated with cleaning and control of infection aboard a vessel.

The investigating team will decide when the outbreak has finished with the preparation of a report containing recommendations for future action.

3.7 Food Safety Incidents

LPHA is committed to ensuring a prompt and proportionate response to all Food Incidents.

Notifications of Food Alerts and Allergy Alerts issued by the Food Standards Agency are sent to all Port Health Officers in the Service. Those Officers responsible for Food Hygiene enforcement will assess the impact upon their service and take action accordingly. Officers responsible for Imported Food Control will monitor these alerts to determine if any such products are imported, action can then be taken to target these products in future to monitor them at the point of entry. In respect of Imported Food, each office utilises a whiteboard to list hazardous products and it is located so that officers can refer to it during the application of their duties.

Rapid Alert Notifications issue by the European Commission are sent to a designated Officer who is responsible for their distribution amongst the Officers involved in Imported Food Enforcement. Officers scrutinise these reports to determine if such products or similar are likely to be imported allowing future imports to be targeted or control at the point of entry, effectively ensuring affected products do not enter the UK. The office whiteboard system is again used as an aide memoir to enforcement staff.

All Rapid Alert notifications are stored electronically in pdf format on the H: drive which is accessible to all Officers.

All additional sampling and examination activity carried out as a result of a Rapid Alert notification is logged on our NAO inspection database, the Sampling database

and in hard-copy format on the relevant examination form, filed in the relevant ship's file.

FSA Food Alerts are sent to nominated officers within LPHA. The alerts often relate to products outside the remit of a Port Health Authority i.e. internal market however, where an import related product is identified, the designated officer circulates it to staff members within their division.

LPHA has a documented procedure for RASFF's, Food Incidents and Food Alerts. The procedure is located in the ISO Quality Manual.

3.8 Liaison with other Organisations

LPHA has contact with a number of national organisations in an attempt to ensure consistency and remain at the cutting edge of developments within food and animal health. The organisations include:

UK Border Agency [UKBA] and Border Force

Food Standards Agency [FSA]

Department for the Environment and Rural Affairs [Defra]

Animal Health and Veterinary Medicines Agency [AHVLA]

Veterinary Medicines Directorate [VMD]

Rural Payments Agency

The Forestry Commission- Plant Health Service

The Department of Health [DoH]

Public Health England [PHE]

Chartered Institute of Environmental Health [CIEH]

Environment Agency [EA]

Port of London Authority [PLA]

Medway Ports Authority [MPA]

London City Airport Control Authorities Group

The primary aim of these liaison meetings is to maintain awareness and provide consistency in its activity.

LPHA is no longer a member of the Association of Port Health Authorities (APHA) and has been instrumental in setting up liaison meetings involving PHAs responsible for other major Seaports. The members are the PHAs for Felixstowe, Southampton and Liverpool as well as FSA, Defra and AHVLA. This enables matters of strategic and operational significance related to Imported Food Controls to be considered.

LPHA is involved with the Small Ports network and contributes meetings of the South Eastern Port Liaison Network (PLAN) group. Occasional liaison meetings also take place with the Eastern PLAN group.

The network allows smaller ports to gain advice and benefit from the expertise available from larger Port Health Authorities on a range of subjects including Imported Food Controls. Recent enquiries to LPHA have related to organic food controls and illegal food imports.

LPHA also maintains regular contact with the FSA, Defra and the UK Border Agency. The contact is typically concerned with the development and implementation of new controls but is also used to clarify the correct or national application of existing controls.

On a specific location basis, LPHA holds regular meetings with the port operators responsible for the Border Inspection Post and inspection facilities within each port. These meetings cover operational and organisational matters relating to the inspection facilities and consider practical arrangements for the inspection of cargo.

3.9 Promotional Activity

LPHA does not currently promote food hygiene activity other than through its enforcement activity which includes the Food Hygiene Rating Scheme. There is close liaison with City of London Food Safety Team colleagues regarding the Scheme.

LPHA has available promotional literature for Infectious disease aboard vessels.

4 RESOURCES

4.1 Financial Allocation

The overall expenditure in providing the Port Health Service is contained in Appendix 2 which shows the estimated expenditure for 2013-14.

The Port Health Service currently has a deficit of £200,00 and a review of the service is underway to identify the savings required. This will take account of development work related to the London Gateway Port.

Many of the services provided by LPHA are conducted on a full cost recovery basis and this area will be reviewed to make sure that all appropriate costs are being recovered.

4.2 Staffing Allocation - For 2013/14

- **Imported Food Control (Non POAO)**

- 0.7 x Assistant Port Health Service Director
- 1.0 x Port Health Manager
- 3.0 x Port Health Officer
- 1.0 x General Assistant
- 0.5 x Support Assistant

- **Programmed Food Hygiene Inspections**

- 0.1 x Assistant Port Health Service Director
- 0.2 x Port Health Manager
- 1.3 x Port Health Officer
- 0.75 x Support Assistant
- 0.4 x Navigator

- **Fishery Products & Live Shellfish Controls**

0.2 x Assistant Port Health Service Director
0.5 x Port Health Officer
0.3 x Technical Officer
0.75 x Navigator
0.25 x Engineer

4.3 Staff Development Plan

Staff development is managed through the City of London Performance and Development Framework appraisal scheme and is linked to the corporate learning and development strategy.

Port Health Officers are educated to Degree or Diploma standard in Environmental Health and possess EHORB Registration from the Chartered Institute of Environmental Health. In addition, all Port Health Officers must also be qualified Veterinary Auxiliaries.

All Port Health Officers are encouraged to attain Chartered status at the earliest opportunity.

The BRDO Regulators Development Needs Analysis tool is available to inform the individual training needs of staff.

The Port Health operational Management team:

- Reviews training needs, to take into account any development regarding the Law concerning Food; in particular: Food Hygiene, Food Standards, Composition and Labelling, and Imported Food, in addition to any changes in departmental responsibilities.
- Carries out annual formal appraisals with individual members of staff, reviewing progress and agreeing actions, also taking into account their aspirations and (CPD) needs, as determined by the Chartered Institute of Environmental Health and Investors in People (IIP) principles.

Training is provided externally or internally, as follows, with the opportunity to cascade information via presentations delivered at staff seminars, held biannually:

External - These are courses provided by recognised providers.

Internal - These are part of the programme of internal courses organised by the Learning and Development section, or specific corporate or Departmental initiatives which are usually recognised for CPD purposes.

5 QUALITY ASSESSMENT

Evaluation of compliance with the statutory duties of London Port Health is achieved through different internal and external elements of review and control.

The Port Health Authority operates under the accredited ISO 9001:2000 quality management system.

Internal Audits of the ISO system are arranged at least once per year by trained QA auditors who are independent of the functions being audited.

These are followed by External audits by an independent external ISO 9001 accreditation body.

Other external Audits are carried out by Defra through the Animal Health and Veterinary Laboratory Agency which carries out regular Audits of the import procedures at Thamesport and Tilbury BIPs. The FSA covers most other food related activities of the LPHA.

Routine Audits are also carried out by the Food and Veterinary Office of the European Commission in regards to import controls of products of animal origin at Tilbury and Thamesport BIPs.

Internally, Key Performance Indicators have been identified in the Port Health Business Plan, and the APHSD monitors and reports on these at the ISO Management Review Meetings, and to the Port Health & Environmental Services Committee.

Internal quality checks are carried out monthly on a 10% of the CVED and CED data entries. The results are cascaded for information and discussed in the office management meetings.

LPHA has close liaison with Suffolk Coastal Port Health Authority responsible for the port of Felixstowe. The aim of this partnership is to bring consistency of enforcement, as more than 70% of all UK food imports enter via Felixstowe and London. The introduction of PHILIS has helped cement close ties.

6 REVIEW

6.1 Reviews against the Service Plan

Once a year the Port Health Operational Management team will conduct a review of the LPHA's performance against the Service Plan and the Departmental Business Plan. Statistics produced for returns and the Port Health & Environmental Services Committee are also reviewed.

On a six monthly basis, the Operational Management team will review individual aspects of the Service plan with a view to monitoring compliance against it. Urgent or immediate amendments to the plan will be made on a case by case basis.

6.2. Identification

Where a variation from the Service Plan is identified, reasons will be sought and changes made to the Plan at the appropriate review meeting. See 6.1 for urgent issues.

Personnel performance will usually be covered during appraisal meetings but where appropriate, individuals may be advised of performance issues separately. It is anticipated that any remedial action will most likely take the

form of re-training, however depending upon the circumstances, capability or disciplinary action would also be considered.

6.3. Areas of Improvement

LPHA is committed to providing an excellent service to its customers. The review of our performance against our Business Plan (which is linked to this Plan) is considered essential to overall performance.

The City of London is committed to service improvement and development. Where necessary it will identify and include changes in the Departmental and Divisional Business Plans. These are subject to annual review prior to submission for approval to the Port Health and Environmental Services Committee.

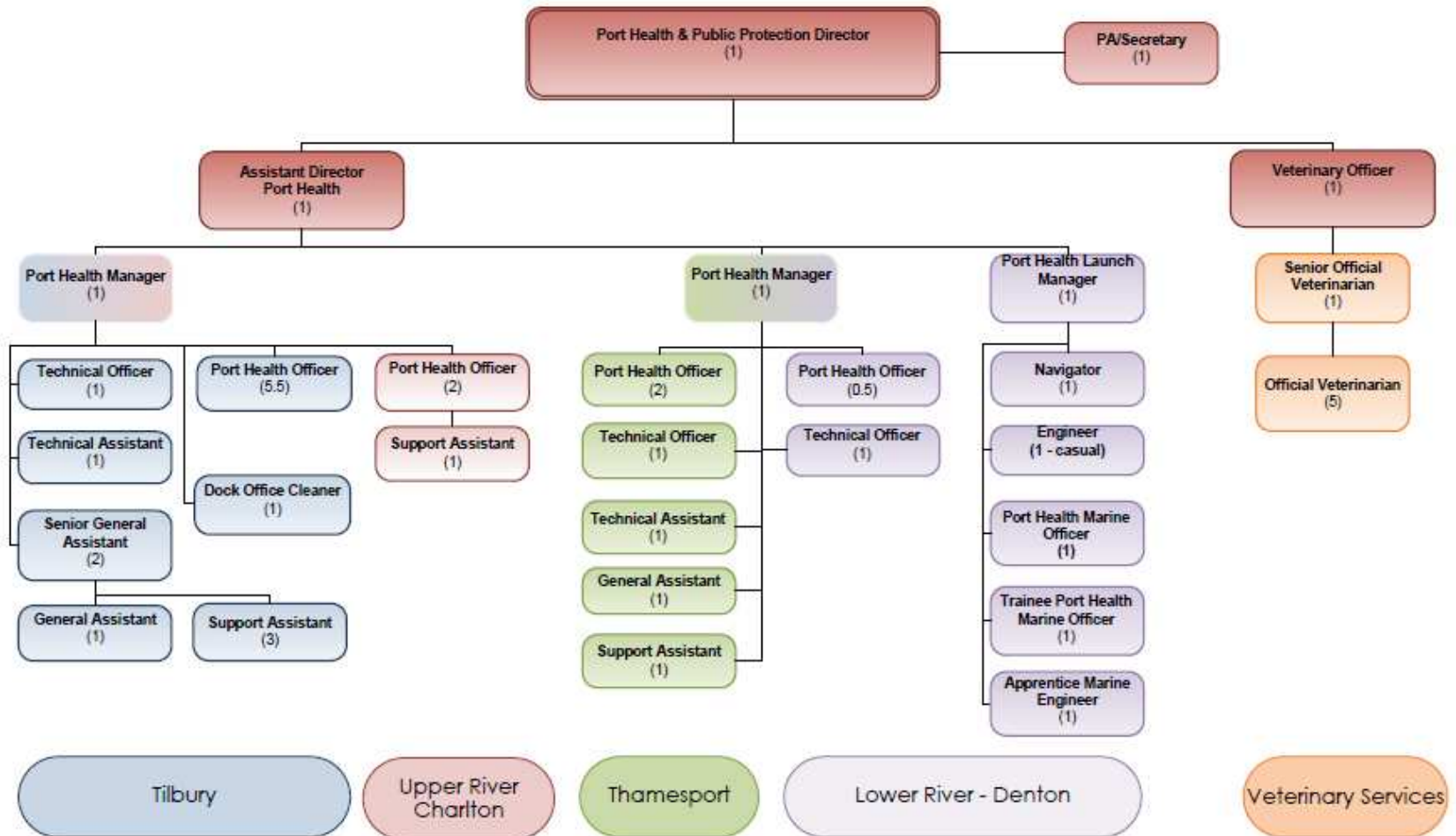
A major priority is the development of the use of information technology including PHILIS: this will provide an opportunity make better use of available resources, and will be essential to deal with the future volumes of imports anticipated at the London Gateway port.

The management review mechanism within the ISO standard also facilitates continuous improvement in accordance with the areas covered by that scheme.

Appendix 1 Organisational Chart

Department of Markets and Consumer Protection Port Health & Public Protection Division Port Health Service

Appendix 1



Appendix 2 Financial Data

	Latest Approved Budget 2013/14 £
Port & Launches DDH50	
Direct Employees	2,017,000
Indirect Employees	50,000
Rent - POAO	24,000
Rent - Non POAO	19,000
Rent - River Division Activities	21,000
Rent - Launch	7,000
Rates	38,000
Other	42,000
Premises	151,000
Launch - Repair & Maintenance of Vehicles	77,000
Car Allowances - POAO	42,000
Car Allowances - Non POAO	35,000
Car Allowances - River Division Activities	10,000
Other	44,000
Transport	208,000
Total Equipment	27,000
Total Clothes, Uniform & Laundry	14,000
Total Printing, Stationery & General Office Expenses	26,000
Consultants Fees - POAO (Routine Sampling)	56,000
Consultants Fees - Non POAO (Routine Sampling)	52,000
Inspection Analysis Fees-POAO (Rechargeable)	20,000
Inspection Analysis Fees- Non POAO (Rechargeable)	
Common Entry Document (CED)	61,000
Shellfish Sampling	10,000
Total Telephones	19,000
Software Maintenance and Support - POAO	20,000
Software Maintenance and Support - Non POAO	16,000
London Gateway	0
Other	54,000
Supplies and Services	375,000
Unidentified Savings	-236,000
Total Expenditure	2,565,000

	Latest Approved Budget 2013/14 £
Port & Launches DDH50	
IUU Fishing Regulations	-25,000
Imports - POAO - CVED'S	-1,460,000
CED Non POAO	-120,000
Organic Certificates	-62,000
Ship Sanitation	-24,000
Rechargeable Sampling	-37,000
Plastic Kitchenware Sampling	-1,000
Rodent Control	-18,000
Other	-8,000
Income	-1,755,000
Total Net Expenditure - Local Risk	810,000

Appendix 2 Financial Data contd.