

Mr Chris Bradshaw,  
Chief Executive,  
Rhondda Cynon Taff County Borough  
Council,  
Ty Elai, Dinas Isaf East,  
Williamstown, Tonypany.  
CF40 1NY

1<sup>st</sup> July 2021

Dear Mr. Bradshaw,

**FOOD STANDARDS AGENCY (FSA) AUDIT: REGIONAL FEED LAW  
ENFORCEMENT SERVICES – CWM TAF, 10<sup>TH</sup>-12<sup>TH</sup> DECEMBER 2019**

I would like to thank you and your officers for their time and assistance to enable us to complete the audit of the regional feed law enforcement service. As discussed with the liaison officers at the opening meeting, our visit formed part of a programme of visits to local authorities to assess the delivery of official feed controls conducted as part of the Cwm Taf regional feed service. Detailed feedback of our findings was provided to the relevant service managers and officers and a summary of the preliminary overall findings was delivered at the conclusion of the visit. I am now writing to confirm the audit findings, which are attached to this letter at Annex 1. An agreed action plan containing the recommendations identified has been attached at Annex 2.

The authority is reminded that not all recommendations are of equal significance, for example, recommendations relating to resourcing, management of intervention programmes and internal monitoring carry a higher level of significance. Also, not all recommendations are equal in relation to the quantity of the requirements that are required in order to complete them. For example, one recommendation may comprise of a dozen or more individual parts. It is noted that the number of recommendations raised is not always representative of overall achievement. It is important that the root cause of any issue is identified, and that corrective and

preventative action is carried out. This is where the importance of internal monitoring is key to maintaining improved standards.

An overall assessment of the assurance of the region's feed service has been attached at Annex 3, whilst Annex 4 contains an indication of the issues that apply to your authority. The assessment of assurance at Annex 3 is currently being piloted. Any comments on the details involved; including the wording of categories should be made using the attached audit feedback questionnaire.

It is expected that the report letter be brought to the attention of relevant Members and that the regional lead officer ensures that all regional local authority partners be informed of the audit findings and action plan.

You will be aware that the findings will be used to inform a summary feed audit report incorporating the findings of all six regional audits which will be published on the FSA website. This will consider the impact of the regional feed delivery model across Wales and include any examples of good practice that are identified across the six regions. A draft of this summary report will be circulated for comment, following completion of the audit programme, prior to its publication on the FSA's website. This letter and its associated annexes will not be published.

If you would like any further information, please do not hesitate to contact me on 029 20 678918. A copy of this letter has been sent to Louise Davies, Service Director, Public Protection.

Yours sincerely



**Steve Adie**  
**Auditor, Consumer Protection Team**

cc Paul Mee, Director of Public Health and Community Services  
Louise Davies, Service Director, Public Protection  
Judith Parry, Trading Standards and Registrar Service Manager  
Gary Lewis, Senior Food and Agricultural Standards Officer

Enc: Annex 1 – Cwm Taf Region Feed Audit Findings  
Annex 2 – Cwm Taf Region Feed Audit Action Plan  
Annex 3 – Assessment of assurance for Cwm Taf Regional Feed Service  
Annex 4 – Indication of issues for RCT

## Summary of Cwm Taf Region Feed Audit Findings

### **1.0 Organisation and management of feed enforcement service and interventions programmes**

- 1.1 Feed service delivery is co-ordinated across the two Cwm Taf authorities by the regional feed lead officer in Rhondda Cynon Taff (RCT). There are currently three officers undertaking feed duties in addition to other Trading Standards duties, and at present they are all employed by one authority. The total number of full time equivalent (FTE) officers undertaking feed work is 0.6. The average proportion of time therefore currently spent on feed work per officer is 0.2 FTE. Both authorities are training additional staff to undertake feed work, who, it is anticipated, will contribute up to another 0.4 FTE of their time to feed work. The number of feed officers in Cwm Taf has reduced significantly (1.75 FTE to 0.6 FTE) since the inception of the regional feed delivery model in 2015, when funding was removed from the Revenue Support Grant and issued directly to local authorities (LAs) by the FSA based on an agreed annual programme of interventions and other feed control activity.
- 1.2 At the time of the audit, in the Cwm Taf region, RCT was responsible for the day to day delivery of the regions' feed enforcement activities and for leading and co-ordinating the intervention programme and sampling activities. The regional lead officer co-ordinated activities through liaison with a point of contact at Merthyr.
- 1.3 Under the Memorandum of Understanding (MoU) that governs the regional delivery of the feed service, the region plans its activities in relation to the intervention targets set by the FSA. A sampling plan is created at regional level according to the budget provided by the FSA. Activities undertaken by LAs are reported quarterly to the regional feed lead officer and then a combined return is made to the FSA. The return at the end of the last financial year indicated that the Cwm Taf region had, on the whole, delivered the planned numbers of inspections and samples, with some variance in the type of activity. The variances were considered to be reasonable, reflecting decisions made by authorities in response to changes in businesses and trading activities within each area.
- 1.4 A small number of rated establishments were overdue, in accordance with the frequencies in the Feed Law Code of Practice (FeLCP), at one authority. There were no unrated premises at either authority and interventions were being selected for inclusion within the programmes in a risk based manner.
- 1.5 Progress in meeting regional obligations were reported through a number of regional and national groups, including the Wales Heads of Trading Standards Group and authorities were also reporting progress on service delivery upwards to Cabinet Members.

## 2.0 Authorisation and Training of Officers

- 2.1 The authorisation of officers was being carried out by each LA for officers undertaking enforcement activities within their areas. Those authorisations were based on assessments of competence, which were overseen by the regional feed lead officer based on information collected from each LA in a standard all Wales format.
- 2.2 Auditors were shown cross border authorisations for officers in RCT to undertake activities in the Merthyr area, however, these require updating to ensure that all relevant legislation is included.
- 2.3 One authority had documented its procedures for authorising officers. The procedures should be amended to include documenting the full process of authorisation, the assessment of officer competence and linking both the authorisation document and the competency assessment record.

### **Recommendation 1**

- a) Authorities shall set up, maintain and implement a documented procedure for the authorisation of officers based on their competence and in accordance with the relevant Codes of Practice and any centrally issued guidance.
- b) Authorities should review and update authorisation documents to ensure they include references to all relevant and up to date legislation. The level of authorisation of officers should be consistent with their qualifications, training, experience and the Feed Law Code of Practice. Where authorisation certificates do not provide information on the level of authorisation, but such information is provided within respective assessments of competence, these documents should be linked within a single overarching instrument of authorisation. [The Standard 5.1 & 5.3]

- 2.4 A sample of authorisation, qualification and training records indicated that most officers had been authorised in accordance with their qualifications, training and experience. Officers in one authority were authorised, other than in accordance with a competency assessment, however, it was noted that they were not currently undertaking feed duties. Academic and other relevant qualifications were available for all feed officers, where relevant.
- 2.5 All officers had undertaken the required minimum of 10 hours CPD. In one authority records of qualifications and training were maintained by individual officers rather than centrally by the LA.

### ***Recommendation 2***

Records of qualifications, training and experience of each authorised officer must be maintained by local authorities [The Standard 5.5]

## **3.0 Feed Establishments Interventions and Inspections, Records and Reports**

- 3.1 One authority had developed a documented feed intervention procedure which provided details for officers on how to conduct feed interventions. The procedure would benefit from directing officers to the appropriate inspection forms and inspection report forms. It would also benefit from the inclusion of further detail to ensure the accuracy of registration activity codes, adding reference to the Home Authority Principle, prioritising risk within new businesses, providing information to officers on revisits including when they are appropriate and timescales, undertaking unannounced or short notice inspections and information relating to the removal of earned recognition, as appropriate.

### ***Recommendation 3***

Local authorities shall set up, maintain and implement documented procedures for the range of interventions/inspections carried out. [The Standard 7.4]

- 3.2 The intervention procedure that had been developed at one authority was supplemented by inspection forms for use at different types of feed establishments. The inspection forms were in use across the region and provided a consistent approach to capturing inspection observations and to the recording of assessments made during the course of inspections.
- 3.3 The inspection forms would benefit from minor amendment to ensure capture of information in relation to whether interventions were unannounced or short notice.
- 3.4 A total of 10 premises files, five from each LA, were selected for audit in relation to feed interventions. Evidence of inspection observations was available in all cases, which generally indicated that thorough assessments of compliance had been undertaken.
- 3.5 Some areas for improvement were identified to ensure that sufficiently detailed records of inspection were consistently being maintained. This included consistently recording the size and scale of business operations, evidencing thorough traceability assessments, assessing business progress in meeting

compliance with HACCP requirements and recording the nature and extent of pest issues. Further areas for improvement were identified including consistently applying the correct risk rating compliance score, consistently undertaking appropriate follow up action and timely revisits, and ensuring significant issues from previous inspections are followed up.

- 3.6 Further, inspection report forms for different types of feed establishments had been developed in order to provide feed business operators (FeBOs) with information about the outcome of each intervention. Three different report forms were in use across the region. The inspection reports provided to FeBOs contained specific prompts to record most of the required information with the exception of an indication of the action to be taken by the feed authority and up to date legislation under which the intervention was conducted. In some cases, **the various report forms would benefit from prompts** to include the name of the FeBO, whether or not samples were taken, clear separation of legal requirements and recommendations and timescales for achieving compliance.
- 3.7 Out of the ten file checks, inspection report forms provided to FeBOs were available in all cases and contained most of the required information. Examples were found where **some information had not been provided** including whether or not samples were taken, senior officer contact details, the name of the FeBO, the specific legislation under which the intervention was conducted, the recording of contraventions identified, including a timescale for compliance and stating the action to be taken by the feed authority.
- 3.8 At one authority there was an IT related issue in relation to their database, that affected their ability to apply earned recognition compliance scores for farm assurance scheme members, of schemes which had been approved by the FSA. A manual system was being used whilst the IT solution was being investigated.

#### ***Recommendation 4***

(a) Local authorities shall carry out interventions/inspections in accordance with the relevant legislation, Codes of Practice, centrally issued guidance and the Authority's policies and procedures. [The Standard 7.2]

(b) Local authorities shall assess the compliance of establishments and systems in their area to the legally prescribed standards. [The Standard 7.3]

(c) Local authorities shall maintain up to date accurate records in retrievable form on all feed establishments in its area, in accordance with Codes of Practice and centrally issued guidance. These records shall include the determination of compliance with legal requirements made by the authorised officer and details of action taken where non-compliance was identified. The authority should also record, with reasons, any deviations from set procedures. [The Standard 16.1]

#### 4.0 Feed Establishments Databases

4.1 The databases were well maintained, with no data errors or duplicate premises identified and no unrated premises.

#### 5.0 Sampling

5.1 One authority had developed a documented feed sampling procedure and policy. This was in accordance with requirements.

##### ***Good Practice***

Rhondda Cynon Taff had published the feed sampling policy on its website making it easily available to consumers and businesses.

##### ***Recommendation 5***

Local authorities shall set up, maintain and implement a documented sampling policy that shall accord with any centrally issued or relevant guidance, and relevant Codes of Practice and shall include reference to its approach to any relevant national sampling programme centrally co-ordinated by the Food Standards Agency. [The Standard – 12.4]

5.2 One authority had documented its feed sampling procedure which provided information for officers in relation to how to conduct sampling activities.

##### ***Recommendation 6***

Local authorities shall set up, maintain and implement documented procedures for the procurement or purchase of samples, continuity of evidence and the prevention of deterioration or damage to samples whilst under its control in accordance with the relevant Codes of Practice and centrally issued guidance. [The Standard – 12.5]

- 5.3 Checks were carried out on two feed sample files within the audit timeframe where unsatisfactory results of analysis were obtained. All sampling had been undertaken by authorised officers, the results of analysis were available and FeBOs had been notified of the unsatisfactory results. In one instance, appropriate follow-up action had not been undertaken at the farm where the sample was taken.

#### ***Recommendation 7***

Local authorities shall take appropriate action where sample results are not considered to be satisfactory. [The Standard – 12.7]

### **6.0 Feed Incidents**

- 6.1 One of the authorities had developed a comprehensive documented procedure which provided information for officers in relation to feed alerts issued by the FSA. Procedures for initiating feed incidents were not available.
- 6.2 There were no examples within the audit timeframe of where feed incidents had been initiated or responded to by either LA.

#### ***Recommendation 8***

Local authorities shall set up, maintain and implement a documented procedure for initiating and responding to feed alerts, in accordance with the relevant Codes of Practice. [The Standard – 14.1]

### **7.0 Enforcement**

- 7.1 Each LA had developed their own enforcement policies which had been documented and approved at the appropriate level. One policy contained the information required for feed enforcement; including the criteria for taking the different types of enforcement action. The other LA policy could be improved by including the criteria for informal action and issuing statutory notices.



### **Recommendation 9**

Local authorities shall set up, maintain and implement a documented enforcement policy, in accordance with the relevant Codes of Practice and other official guidance. [The Standard – 15.1]

- 7.2 One authority had developed documented enforcement procedures which provided information for officers in relation to the conduct of enforcement activities. The enforcement procedures would benefit from including instructions to officers in relation to the use of all enforcement options that are available. Template notices and forms for all type of enforcement options should be linked to the procedures.

### **Recommendation 10**

Local authorities shall set up, maintain and implement documented procedures for follow up and enforcement actions in accordance with the relevant Codes of Practice and official guidance. [The Standard – 15.2]

- 7.3 No formal feed enforcement action had been undertaken across the region within the specified audit timeframe.

## **8.0 Internal Monitoring**

- 8.1 Internal monitoring had taken place in both authorities which included 1-1 meetings with officers to discuss inspections, complaints and training. There was also evidence of shadowing of officers by the regional lead to ensure that officers were competent, consistent, using the correct forms and that advice given to businesses was correct and factual.
- 8.2 One LA had developed a procedure which included line managers shadowing officers during inspections, to ensure consistency and to monitor officer competency. Processes and procedures in relation to qualitative internal monitoring could be improved, to fully specify the scope, quantity and frequency of internal monitoring activity. Authorities would benefit from the use of standard forms, to ensure that more detailed assessments take place.
- 8.3 Auditors were able to verify that limited qualitative monitoring had been undertaken in relation to feed inspections including accompanied inspections and file record checks. The outcomes of internal monitoring had not been recorded in either authority.

### ***Recommendation 11***

(a) All procedures for internal monitoring must be documented including specifying the records to be completed. Documented internal monitoring procedures should include, where appropriate at regional level, local level or both, the following checks:

- An examination of intervention files to check consistency of officer observations and reports.
- That the database risk ratings (including total scores) and due intervention dates are correct. Database checks should include, where applicable, that risk ratings have been amended to reflect the earned recognition status and that an exception report has been made where required.
- That information held on databases and establishment files are consistent with each other; including the correct officer who conducted each intervention.
- An examination of files involving complaints or service requests about feed or feed establishments.
- An examination of files involving sampling activity, particularly those relating to unsatisfactory samples.
- An examination of files involving responses to incidents.
- An examination of files involving formal enforcement actions.

[The Standard – 19.1]

(b) Internal monitoring procedures should be fully implemented, and local authorities should record the outcome of any check and the action taken in relation to any inconsistency identified. [The Standard – 19.1 & 19.3]



TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
3. Local authorities shall set up, maintain and implement documented procedures for the range of interventions/inspections carried out. [The Standard 7.4]	Dec 21	LAs will set up, maintain and implement procedures for the range of interventions/inspections that they carry out or otherwise update them where necessary.	Initial meeting held. Task to follow up with RFLO the proposed 'best practice model policy/procedure' to be agreed by FSA and WHOTS.
<p>4. (a) Local authorities shall carry out interventions/inspections in accordance with the relevant legislation, Codes of Practice, centrally issued guidance and the Authority's policies and procedures. [The Standard 7.2]</p> <p>(b) Local authorities shall assess the compliance of establishments and systems in their area to the legally prescribed standards. [The Standard 7.3]</p> <p>(c) Local authorities shall maintain up to date accurate records in retrievable form on all feed establishments in its area, in accordance with Codes of Practice and centrally issued guidance. These records shall include the determination of compliance with legal requirements made by the authorised officer and details of action taken where non-compliance was identified. The authority should also record, with reasons, any deviations from set procedures. [The Standard 16.1]</p>	<p>April 20</p> <p>April 20</p> <p>April 20</p>	<p>LA's to provide further guidance/advice/training to Officers undertaking Feed Official Controls.</p> <p>LA's to provide further guidance/advice/training to Officers undertaking Feed Official Controls.</p> <p>LA's to provide further guidance/advice/training to Officers undertaking Feed Official Controls.</p>	<p>Some LA's are now able to apply Earned Recognition electronically.</p> <p>Inspections and interventions are now being conducted in line with the Standard.</p> <p>LA's are now maintaining records in line with the Standard.</p>

<b>TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)</b>	<b>BY (DATE)</b>	<b>PLANNED IMPROVEMENTS</b>	<b>ACTION TAKEN TO DATE</b>
5. Local authorities shall set up, maintain and implement a documented sampling policy that shall accord with any centrally issued or relevant guidance, and relevant Codes of Practice and shall include reference to its approach to any relevant national sampling programme centrally co-ordinated by the Food Standards Agency. [The Standard – 12.4]	Dec 21	LA's will set up, maintain and implement a documented sampling policy where necessary, in accordance with issued guidance and relevant Codes of Practice and covering the areas required.	Initial meeting held. Task to follow up with RFLO the proposed 'best practice model policy/procedure' to be agreed by FSA and WHOTS.
6. Local authorities shall set up, maintain and implement documented procedures for the procurement or purchase of samples, continuity of evidence and the prevention of deterioration or damage to samples whilst under its control in accordance with the relevant Codes of Practice and centrally issued guidance. [The Standard – 12.5]	Dec 21	LA's will set up, maintain and implement sampling procedures where necessary, that cover the areas required.	Initial meeting held. Task to follow up with RFLO the proposed 'best practice model policy/procedure' to be agreed by FSA and WHOTS.
7. Local authorities shall take appropriate action where sample results are not considered to be satisfactory. [The Standard – 12.7]	April 20	LA's to provide further guidance/advice/training to Officers undertaking Feed Official Controls.	LA's have provided initial advice and guidance to Officers.

TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)	BY (DATE)	PLANNED IMPROVEMENTS	ACTION TAKEN TO DATE
8. Local authorities shall set up, maintain and implement a documented procedure for initiating and responding to feed alerts, in accordance with the relevant Codes of Practice. [The Standard – 14.1]	Dec 21	LAs will set up, maintain and implement procedures relating to feed alerts or otherwise update them where necessary.	Initial meeting held. Task to follow up with RFLO the proposed 'best practice model policy/procedure' to be agreed by FSA and WHOTS.
9. Local authorities shall set up, maintain and implement a documented enforcement policy, in accordance with the relevant Codes of Practice and other official guidance. [The Standard – 15.1]	Dec 21	LA's will amend their Enforcement Policy where necessary.	Initial meeting held. Task to follow up with RFLO the proposed 'best practice model policy/procedure' to be agreed by FSA and WHOTS.
10. Local authorities shall set up, maintain and implement documented procedures for follow up and enforcement actions in accordance with the relevant Codes of Practice and official guidance. [The Standard – 15.2]	April 20	LAs will set up, maintain and implement procedures for follow up and enforcement actions.  LA's to provide further guidance/advice/training to Officers undertaking Feed Official Controls.	Initial meeting held. Task to follow up with RFLO the proposed 'best practice model policy/procedure' to be agreed by FSA and WHOTS.

<b>TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)</b>	<b>BY (DATE)</b>	<b>PLANNED IMPROVEMENTS</b>	<b>ACTION TAKEN TO DATE</b>
<p>11. (a) All procedures for internal monitoring must be documented including specifying the records to be completed. Documented internal monitoring procedures should include, where appropriate at regional level, local level or both, the following checks:</p> <ul style="list-style-type: none"> <li>• That the database risk ratings (including total scores) and due intervention dates are correct.</li> <li>• Database checks should include, where applicable, that risk ratings have been amended to reflect the earned recognition status and that an exception report has been made where required.</li> <li>• That information held on databases and establishment files are consistent with each other; including the correct officer who conducted each intervention.</li> <li>• An examination of files involving complaints or service requests about feed or feed establishments.</li> <li>• An examination of files involving sampling activity, particularly those relating to unsatisfactory samples.</li> <li>• An examination of files involving responses to incidents.</li> <li>• An examination of files involving formal enforcement actions.</li> </ul> <p>[The Standard – 19.1]</p>	Dec 21	LAs will set up, maintain and implement internal monitoring procedures or otherwise update them where necessary.	<p>Use of WHoTS Shadowing/monitoring form implemented</p> <p>Initial meeting held. Task to follow up with RFLO the proposed 'best practice model policy/procedure' to be agreed by FSA and WHOTS.</p>

<b>TO ADDRESS (RECOMMENDATION INCLUDING STANDARD PARAGRAPH)</b>	<b>BY (DATE)</b>	<b>PLANNED IMPROVEMENTS</b>	<b>ACTION TAKEN TO DATE</b>
(b) Internal monitoring procedures should be fully implemented, and local authorities should record the outcome of any check and the action taken in relation to any inconsistency identified. [The Standard – 19.1 & 19.3]	Dec 21	LA's will implement and amend, their internal monitoring procedures, where necessary.	



### Assessment of assurance for Cwm Taf Regional Feed Service

<b>Assessment of Assurance:</b>	
	<p><b>Moderate Assurance:</b> The system for delivering official controls requires some improvement to fully demonstrate effective implementation of planned arrangements suitable to achieve the objectives of legal requirements and guidance.</p>

### Audit Opinion

The opinion above is based upon four categories of audit assurance that is applied in relation to each audit report.

AUDIT OPINION – ASSESSMENT OF ASSURANCE	
Assurance	Definition
<b>Substantial</b>	The system for delivering official controls demonstrate effective implementation of planned arrangements suitable to achieve the objectives of legal requirements and guidance.
<b>Moderate</b>	The system for delivering official controls requires some improvement to fully demonstrate effective implementation of planned arrangements suitable to achieve the objectives of legal requirements and guidance.
<b>Limited</b>	The system for delivering official controls requires significant improvement to fully demonstrate effective implementation of planned arrangements suitable to achieve the objectives of legal requirements and guidance.
<b>Unsatisfactory</b>	The system for delivering official controls requires substantial improvement to fully demonstrate effective implementation of planned arrangements suitable to achieve the objectives of legal requirements and guidance.

## Indication of issues for RCT

Report paragraph	Audit finding
2.2 & Rec 1	Cross border authorisation certificates require updating to include the addition of key legislation.
2.3 & Rec 1	Documented procedures for the authorisation of officers should be updated and amended to include the documentation of the full process of authorisation, the assessment of officer competence and linking the authorisation document to the competency assessment.
3.1 & Rec 3	The interventions procedure required some amendments which included directing officers to the appropriate inspection forms and inspection report forms. It would also benefit from including information relating to the application or removal of earned recognition, ensuring the accuracy of registration activity codes, adding reference to the Home Authority principle, prioritising risk within new businesses, providing information to officers on revisits, including when they are appropriate and timescales and undertaking unannounced or short-notice inspections.
3.3 & Rec 4	The inspection forms would benefit from minor amendment to ensure capture of information in relation to whether interventions were unannounced or short notice.
3.5 & Rec 4	Premises files required improvement to ensure that sufficiently detailed records of inspection were being maintained that included: - <ul style="list-style-type: none"> <li>• Recording the size and scale of business operations</li> <li>• Evidencing thorough traceability assessments</li> <li>• Consistently undertaking appropriate follow up action and timely revisits</li> <li>• Ensuring significant issues from previous inspections are followed up.</li> </ul>
3.6 & Rec 4	Some of the inspection report forms issued to FeBOs would benefit from amendment to include prompts that would identify: - <ul style="list-style-type: none"> <li>• The name of the FeBO</li> <li>• Whether or not samples were taken</li> <li>• Clear separation of legal requirements and recommendations</li> <li>• Timescales for achieving compliance</li> <li>• An indication of the action to be taken by the feed authority</li> <li>• Specific, up to date legislation under which the intervention was conducted</li> </ul>

3.7 & Rec 4	<p>Out of the files checked, some files did not provide all required information, including: -</p> <ul style="list-style-type: none"> <li>• Whether or not samples were taken</li> <li>• Name of the FeBO</li> <li>• Specific legislation that the intervention was conducted under</li> <li>• Recording of contraventions identified</li> <li>• Timescales for compliance</li> <li>• Indicating action to be taken by the feed authority</li> </ul>
5.3 & Rec 7	Appropriate follow-up action should be undertaken in relation to unsatisfactory sample results.
6.1 & Rec 8	The feed incident procedure should be amended to include the initiation of feed incidents.
7.2 & Rec 10	The enforcement procedures would benefit from including instructions to officers in relation to the use of all enforcement options that are available. Template notices and forms for all type of enforcement options should be linked to the procedures.
8.2 & Rec 11	Processes and procedures in relation to qualitative internal monitoring could be improved, to fully specify the scope, quantity and frequency of internal monitoring activity, and the use of standard forms which will help to ensure that thorough assessments of officer's intervention activities take place.
8.3 & Rec 11	Outcomes of internal monitoring not documented