

Agenda Item	15.
Report No	RES/31/24

The Highland Council

Committee: Corporate Resources

Date: 11 September 2024

Report Title: Trading Standards Performance 2023/24 and Operational Plan 2024/25

Report By: Assistant Chief Executive - Corporate

1. Purpose/Executive Summary

1.1 This report provides details of the performance of the Council's Trading Standards team in the last financial year and sets out its Operational Plan for the current year.

2. Recommendations

2.1 Members are asked to:

- i. **Note** the performance of the Trading Standards team during the year 2023/24 as laid out in its Annual Report.
- ii. **Consider** and **approve** the Trading Standards Operational Plan for 2024/25

3. Implications

3.1 **Resource:** Highland Council's Trading Standards service is delivered by a small team of fifteen officers. Since 2016, all work carried out involves statutory duties which are required of the Council. Resources must be strictly prioritised, with a focus on public health and safety, cases of significant economic detriment and fairness to reputable local businesses. The team are high users of technology to enable more efficient working while still ensuring that all parts of the Highlands receive a good service.

3.2 **Legal:** The team's legal responsibilities and powers come from a wide range of devolved and reserved legislation. All work planning and delivery is done in accordance with legal requirements in the legislation and the principles of both the Scottish Regulators' Strategic Code of Practice and the UK Regulators' Code. Both codes require a reasonable and balanced approach that takes account of the needs of consumers, businesses and society at large. This is summarised in the Scottish code as "Proportionate, Consistent, Accountable, Transparent and Targeted".

3.3 **Risk:** In common with Trading Standards services across Scotland, the team faces resource challenges in tackling increasing and changing demands, e.g. the upcoming single-use vapes ban. This challenge is exacerbated by an ageing workforce and the potential loss of key skills. These developments have been recognised by the Scottish Government and COSLA who are working with the Society of Chief Officers of Trading

Standards in Scotland (SCOTSS) to boost resilience and sustainability. One strand of that is the recent creation of a Modern Apprenticeship for Regulatory Services which has now has its first intake. Serving as a pathway successful apprentices may be appointed at a basic Enforcement Officer level, or go on to complete the full Chartered Trading Standards Institute (CTSI) qualification and become fully qualified Trading Standards Officers.

3.4 **Health and Safety (risks arising from changes to plant, equipment, process, or people):** There are no specific health and safety implications from this report (all work activities are routinely risk assessed in line with health and safety legislation).

3.5 **Gaelic:** There are no specific Gaelic implications from this report.

4. Impacts

4.1 In Highland, all policies, strategies or service changes are subject to an integrated screening for impact for Equalities, Poverty and Human Rights, Children's Rights and Wellbeing, Climate Change, Islands and Mainland Rural Communities, and Data Protection. Where identified as required, a full impact assessment will be undertaken.

4.2 Considering impacts is a core part of the decision-making process and needs to inform the decision-making process. When taking any decision, Members must give due regard to the findings of any assessment.

4.3 This is an update report and therefore an impact assessment is not required.

5. Background on Trading Standards Team

5.1 The team is part of the Legal and Governance service. It undertakes a wide range of statutory duties in relation to the regulation of trade and protection of consumers and reputable businesses. There are two sub-teams organised on a functional basis and a total of 14 operational officers and a manager. See **Appendix 1** for an organisational chart for the team. Operational activities include investigation of complaints, inspections of business premises, advice and guidance to businesses, and various crime prevention initiatives. Work is largely "intelligence-led" and based on tackling significant economic or physical harm. Work planning and prioritisation is informed by the needs of the Council's Programme for the Highlands and national Trading Standards objectives. See **Appendix 3** for more details.

5.2 The specific functions are from a mix of reserved and devolved law that aims to protect consumers and reputable businesses. Topic areas include:

- Fair Trading: a broad category which includes tackling unfair practices such as false claims, and regulation of the basic consumer rights that underpin trade (e.g. product quality, online buying, fair contract terms).
- Doorstep Crime, Scams and Illicit Trade: tackling organised crime in these areas through a mix of investigation and preventative work.
- Product safety: ensuring that consumer goods are safe, e.g. toys, electrical, cosmetics.
- Petroleum and Explosives: safe storage of these potential very hazardous products.
- Weights & Measures: ensuring quantity is correct in both retail and commercial environments;

- Taxis and Private Hire Cars: promoting quality and safety in this key local industry affecting both visitors and local residents.
- Controls on sales of Tobacco and Nicotine Vapour Products and Age Restricted Sales (including fireworks, spray paints and lighter fuel).
- Animal Feed Quality: both in terms of inland supply to farmers and other users, and importation at Border Control Posts, this is a key intervention for a safe food chain.

6. Performance in 2023/24

6.1 In 2023/24, the Team delivered on its Operational Plan across the different topic areas, with a continued focus on issues linked to the ongoing “Cost of Living Crisis”.

Headlines included:

- Detailed interactions with 1131 businesses (e.g. visits, guidance on request, etc)
- 89 full investigations into substantial breaches of trading laws were completed, resulting in a range of formal and informal outcomes
- A very substantial and effective response to the community outcry around sales of vapes to children: this included just short of 200 interactions with business including advisory visits and “test purchases” using young volunteers. 21 Fixed Penalty Fines were issued and an innovative first-in-Scotland use of a civil law process to tackle one difficult case.
- Successful implementation of delayed post-Brexit checks on animal feedstuffs imports. This involved active collaboration with business and both the Scottish and UK Governments resulting in a working system being set up.

6.2 The report in **Appendix 2** provides details of the activities of the team last year.

7. Operational Plan for 2024/25

7.1 The Operational Plan for 2024/25 is set out in **Appendix 3**. The main contents are in the table which lists the specific work activities under various topic headings. Progress on each piece of work is monitored at monthly meetings of the two sub-teams, assisted by a “RAG” assessment. The plan has been compiled by the Manager after extensive discussions with staff on what initiatives are necessary and how to prioritise resources most effectively. Some of the activities are entirely local initiatives (e.g. short-term events and shows in the Highlands), while others involve participation in wider projects, usually overseen by the chief officer group SCOTSS (e.g. tackling counterfeit tobacco sales and weight tests on packaged goods). The team has a strong influence on SCOTSS through the team manager being a longstanding member of its executive (currently Immediate Past Chair) and several other members of the team leading for SCOTSS on specific technical subjects. This ensures that matters of concern to the Highland community are prominent in the national planning for Trading Standards activities. Examples of that from recent years include national initiatives on internet delivery charges, work to protect users of off-grid fuels such as heating oil and activities around rural petrol filling stations. Additionally, SCOTSS has enjoyed very good access to Scottish Government in recent years and has been able to influence policy in a positive way, with Highland inputs to this work prominent.

7.2 All activities included in the plan are key to promoting the goals of the service in the Highlands. Among the more prominent and newsworthy issues are:

- Continued work to tackle illegal vape sales, including an upcoming ban on single use vapes.

- Further development of technology-enabled work such as online investigations and increasing prominence of electric vehicle sales.
- Development of the approach to post-Brexit import checks on animal feedstuffs.

8. Proposals for Service Development

- 8.1 The Trading Standards Manager is working with the Assistant Chief Executive – Corporate and the Head of Corporate Governance to explore new ways to further improve the services provided and mitigate risks as detailed at 3.3.

Designation: Assistant Chief Executive - Corporate

Date: 14 August 2024

Author: David MacKenzie, Trading Standards Manager

Appendices: Appendix 1 – Trading Standards Team Organisational Chart
Appendix 2 – Trading Standards Report for 2023/24
Appendix 3 – Trading Standards Operational Plan 2024/25

Appendix 1 – Trading Standards Organisational Chart



Appendix 2 – Trading Standards Report for 2023/24

Highland Council Trading Standards Team 2023-24

Introduction

The Trading Standards Team is part of the Highland Council's Legal and Governance section of the Performance and Governance Service. It undertakes a wide range of statutory duties in relation to the regulation of trade, and protection of consumers and reputable businesses. The Team carries out its functions using a variety of activities including investigations, inspections, advice to business, crime prevention initiatives and formal actions including prosecutions and court orders.

2023-24 was the first full "post-COVID" year for the team, with a complete break from the pandemic era work around enforcing premises health restrictions, dealing with PPE, hand sanitiser supply and COVID holiday cancellation disputes. There was a full return to the standard range of work, much of which had been disrupted by the pandemic. There follows a brief overview of the work carried out in the various topic areas.

Cost of Living Crisis

The previous year had seen the emergence of the "Cost of Living Crisis" which continued into 2023-24. A complex mix of economic factors saw a sudden increase in costs and prices, notably energy, but also across the spectrum of consumer goods and services. For example, rises in commodity costs caused basic food prices to increase quickly and supply problems with building products increased the cost of home improvements. This created circumstances where many consumers had to be very careful with their budgeting, increasing the importance of a fair deal and clarity from businesses. These are fruitful conditions for deceptive practices by unscrupulous businesses and a growth in supply of shoddy and unsafe goods. All Trading Standards work is about protecting consumers and reputable businesses from physical and economic harm and all the activities reported here contribute to tackling the Crisis. But a few particularly targeted matters were:

- A return to fundamental Trading Standards matters such as weights and measures and price display, which have not been top priority in recent years.
- Action to protect consumers and small businesses in the largely unregulated off-grid energy market.
- Engagement with small shops to ensure they were able to treat their customers fairly.

Single Use Vapes and Tobacco Control

This was another area of work which suddenly spiked in 2022-23 and continued into the following year. The significant upsurge in public concerns about single use vapes was tackled with an extensive programme of work. These products consist of a tank of nicotine salt liquid and a lithium-ion battery in a brightly coloured and sealed hard plastic unit, usually having fruity flavours and closely resembling large highlighter pens or make-up products. As such they can be particularly attractive to children.

There are two main problems with this product: illegal supplies to children and excess quantities of nicotine in some varieties, making them unsafe for a user of any age.

During the year, officers seized several hundred illegal vape products. Some vapes, designed for the US market, were found to be up to 10 times higher than the UK legal nicotine level.

Further, 2023-24 saw a total of 96 advisory visits to businesses selling tobacco and vapes and 87 "test purchases" where a young volunteer covertly attempts to buy an age-restricted product under strictly controlled conditions. While most retailers correctly refused sale, some broke the law by selling and a total of 21 Fixed Penalty Fines were issued, while other businesses received formal warnings. One court order was obtained (see Fair Trading Case Study 1).

There was also a focus on food vans selling near schools, although none were found to be selling vapes or cigarettes.

Public Messaging

A significant part of modern Trading Standards work is advisory and preventative: to protect consumers from bad purchases and advise businesses on how to comply and be successful through good practice. Posts highlight consumer rights, business advice, product safety information and latest scams as well as from a wide variety of stakeholders. It also demonstrates the wide and varied remit of Highland Council Trading Standards. Statistics:

- Followers of the Highland Council Trading Standards Facebook page increasing to 1866.
- 1060 posts published in the page during the year.
- Reach for year was 18,905.
- Over 200 responses to requests for specific advice from businesses.
- Several full news releases issued throughout the year to react to emerging issues.

Product Safety

Keeping people safe is a key priority for the Team and a range of product safety matters are handled. Some examples from 2023-24 are below.

- **Toy Safety:** a new Highland business that sells toys was given extensive advice on compliance with this high-risk product type. There was a focus on goods sourced in the EU, which after Brexit count as “imports”, creating more significant obligations.
- **Medical Devices:** Highland consumer purchased an imported electronic medical device from a UK supplier and complained it was giving inaccurate readings. Officers worked with the Medicines and Healthcare products Regulatory Agency (MHRA) to ensure compliance of these goods and protect future users.
- **Safety of Cosmetics:** Highland business was importing perfumes from the EU and applying their own labels, but after investigation some of them were found to be unsafe. Stock was seized and destroyed, and the business accepted, and acted on, guidance on future compliance.
- **Electrical Safety:** A local craft manufacturer was expanding its range of products to table lamps. The trader received advice on labelling, the Declaration of Conformity and completing the technical file, and took action to comply.
- **Toy Safety:** a Highland soft toy business requested advice on complying with the regulations and the chemical aspects of toys. This is a small business selling by “word of mouth”. However, it is still classed as a “manufacturer” and must comply fully. No chemical aspect problems, but the Declaration of Conformity needed to be corrected.
- **Chemical Safety:** Highland manufacturer of various products subject to the Registration, Evaluation, Authorisation and Restriction of Chemicals Regs (commonly known as “REACH”). Investigation found non-compliances with labelling, safety data sheets and other record-keeping, but no evidence of physical safety problems. Non-compliances were rectified.

Another important area of product safety for the Team is the regulation of explosives. Sellers of fireworks must store the products in an approved safe manner and only sell during specified daytime hours and not in quantities exceeding 5kg. A programme of visits was carried out in the lead up to Bonfire Night and several premises were found to have minor non-compliances. These were all followed up to ensure public safety.

There are currently 23 premises licenses under the Explosives Regulations to store and supply explosives in the Highland Council area. Of these, 18 are for the retail supply of fireworks; two for marine pyrotechnics; one for small arms ammunition and agricultural pyrotechnics; one marine/airborne pyrotechnics; one professional fireworks. Additionally, there is one licence for “All Year Round” supply under the Fireworks Act.

Construction Products

Regulation of Construction Products involves both safety and quality considerations. Inspection visits to a sample of nine producers in 2022-23 indicated high levels of technical compliance, however there were product-specific and localised issues that required more detailed examination and product/ingredient testing. The issues explored were complex, involving discussions with academics and other experts. The specialist tests involved are not currently offered by the Public Analyst, so external testing options have been investigated. These tests are relatively expensive, and as a result discussions have taken place with officials from the Office for Product Safety and Standards (OPSS) who have indicated they are willing to help fund testing. However, intermediate testing options were identified, and these are currently being explored.

Scams

Scams continue to blot the consumer landscape with fraudsters quick to exploit the ongoing Cost of Living Crisis. Scams are frequent and unrelenting in their attempts to exploit. These are operated by organised criminals and target vulnerable and elderly people. The Trading Standards work here is mainly prevention as the perpetrators can be anywhere in the world. Financial loss is not the only cost of scams. Feelings of vulnerability can have an overwhelming impact on many victims.

During the year Scams continued to appear at a rapid rate, seeking to take advantage of people's vulnerability. Trading Standards continued to participate in a preventative roll out of "call-blocker" devices, again, no source of funding for new devices was available but some were sourced from other local authorities. Call-blocker devices prevent vulnerable householders from receiving scam calls, while at the same time permitting contact from family, friends, and trusted professionals such as the GP or care worker. The infographic below details the work done in relation to the installation of the devices.

The Trading Standards Financial Harm Toolkit continues to be shared to help other agencies, carers, family members and others understand and take action to prevent this type of harm. Trading Standards have continued to Chair the Highland Adult Support & Protection Community Awareness group.

The Team has also engaged with the UK National Trading Standards (NTS) Scams Team in their Scam Marshal programme. This identifies individuals in the community who may be targets of scams and offers a sign-up into the programme. This helps avoid further emotional and financial detriment to scams while asking the individual to take a stand against scams and play a part in tackling the problem. There are differing roles within the programme but essentially individuals are responsible for collecting scam mail and sending it to the NTS Scams Team. This helps Trading Standards identify the scammers in the international environment. Those who sign up receive regular educational materials. In many cases it has helped to save money, improve self-confidence, reduce clutter in the home, assist with investigations, reduce the temptation to respond, increase awareness of scams, educate and help others. Highland Council is a SCAM Champion within the programme. The programme in Highland has seen a small increase to 54 "Friends" registered, along with seven SCAM champions and 11 Scam Marshals.

Protecting Vulnerable Adults From Scam Phone Calls

Since 2017 Highland Trading Standards have installed 209 call blockers to protect older and vulnerable people from nuisance and scam phone calls. So far 92,499 calls have been blocked, and we estimate that 149 scams have been prevented.



17

average nuisance and scam calls received per unit per month



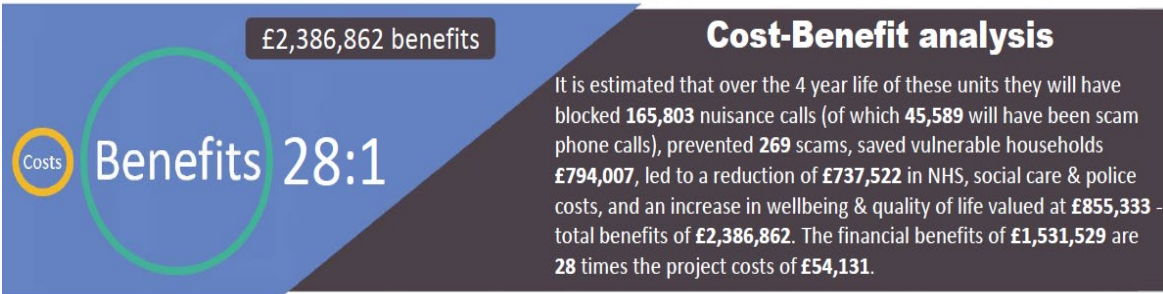
26%

of all calls received were nuisance or scam calls



99%

of nuisance and scam calls were blocked by trueCall call blocking technology



Comments from those protected by the trueCall call blockers



This made a huge difference and enable my mother to live in her own home for longer



My mother no longer gets anxious and agitated. I cannot impress on you the positive impact this has made.



Thanks for making my phone my friend again!



03/03/2024

Fair Trading

The category "Fair Trading" covers a broad spectrum of matters, including:

- False claims and misleading descriptions and other unfair commercial practices
- Enforcement of consumer rights in sales of goods, services and digital content
- Intellectual property rights including Trademarks, Copyright and counterfeit goods
- Regulation of online sales including information, cancellation rights and contract performance
- Provisions requiring prices to be marked on goods and all price comparisons to be fair
- Measures to protect reputable business buyers from unfair practices
- Unfair contract terms such as denial of liability or statutory obligations and unfair penalty charges.
- Home Reports supplied to buyers during house sales
- Energy performance standards for consumer goods

Most of this work is carried out through investigations into complaints and intelligence received about possible and significant breaches of the law. There is a variety of ways that such investigations can be successfully concluded. These can be informal outcomes such as a business changing its practices and giving credible assurances as to future conduct. Where necessary, more formal outcomes are used such a formal warning letter, a formal written Undertaking about future conduct, a civil court order or a prosecution.

Three case studies give examples of these investigations.

Case Study 1: Local hardware shop illegally selling vapes

Intelligence was received from a wide range of community sources that a local hardware shop was selling vapes to children. Controlled test purchases did not result in sales as owner seemed to only sell to local children that he recognised. Further investigations found various technical breaches of rules around vapes. The specific circumstances did not allow specialist vaping laws to be used so action was taken under general Fair Trading legislation and the

general duty of “professional diligence”. The court agreed that this was an appropriate approach, and an Enforcement Order was granted against the seller. This is understood to be the first time in Scotland that this legislation has been used in this innovative way.

Case Study 2: Counterfeit Goods sold on Social Media

A local shop retailer was also operating an online sales outlet through videos posted on Facebook. Surveillance of the online activities under RIPSAs authorisation gathered enough evidence to apply for a warrant to raid both the home and business premises of the seller. A large quantity of counterfeit products was seized, including clothing, jewellery and cosmetics. Cooperation and apparent remorse and credible assurances led to no report going to Procurator Fiscal and a formal Legal Undertaking as to future conduct being accepted as an outcome, with seized goods destroyed. This will be closely monitored.

Case Study 3: Internet “Takedown”

Intelligence indicated that a Highland-based individual was selling counterfeit clothing and footwear through a Facebook selling account. Authorised surveillance appeared to confirm the suspicions, but the identity and geographical address of the seller was not known. Officers worked with the brand holders and the platform operator to have the account removed so that fake goods could no longer be sold.

The Fair Trading work also included a series of projects and initiatives, including those below.

Events and Markets Project 2023-24

This project concerned events and shows held in the Highland area including music and sporting events, and others with a focus on business advice and engaging with event organisers. With the majority of events and shows in the main operating as normal and expanding following the COVID-19 pandemic, it was appropriate to have a strategic overview. This consisted of gathering key information about the main events, organisers and shows within Highland and an assessment of any action where appropriate. Actions consisted of market surveillance visits, contact with event organisers, advice and visits to stallholders together with a review of a semi-tailored general business guidance leaflet. Event organisers assisted with the distribution of business guidance leaflets to stallholders either prior to or on arrival at a particular event.

A large event improved their trader terms to highlight that Trading Standards may receive information about stallholders. Three large events were provided with business guidance for distribution to their traders. Market surveillance was carried out at four large events.

The project will continue in 2024-25 and will build on gathering information on wider events, further engagement with organisers, advice to businesses and market surveillance. The focus remains on advice and guidance to organisers and businesses.

Electric cars

The project was a pilot information gathering initiative involving Highland and Glasgow Trading Standards. Research into the main issues was carried out by both authorities with a key aim of developing an online form that would be used to gather information from electric vehicle retailers during 2024. The proposed study will focus on a few key themes including vehicle range, driving style, battery age, EVs in a cold climate and charging options.

Self-storage Providers

This is an industry that has grown rapidly in recent years and national research has shown that some storage units have been used by criminals to hide counterfeit goods, often unknown to the storage provider. An industry code of practice named “Keep It Real Keep It Legal Tick Box Code of Practice” was launched and this project promoted that scheme with providers in Highland, in conjunction with the Government Intellectual Property office (IPO) and the Society of Chief Officers of Trading Standards in Scotland (SCOTSS). This was the second year of a two-year project and over the two years all Highland providers were approached and checked

for compliance, with two signing up for the Tick Box Scheme. Engagement by the businesses was excellent.

Convenience Store Pricing Project

This supplementary project was adopted following concerns highlighted by a 2022 project looking at a unit pricing issue across the board. That earlier project found particular issues with unpriced goods and overcharging in convenience stores, and this project provided an opportunity to focus entirely on that sector. Local results were mixed but on balance better than the national findings. The traders have been advised and non-compliances rectified.

Doorstep Crime

Doorstep Crime is a form of domestic fraud and involves bogus workers cold calling members of the public at their homes. They are often linked to organised crime groups and focus on exterior home maintenance and provide either seriously substandard, or completely non-existent, works for grossly inflated amounts of money. They are very persuasive and go to great lengths to appear legitimate whilst obscuring their identities to escape detection, often travelling long distances to commit their crimes. Tackling these actions is a national priority for both Trading Standards and Police Scotland. The Cost of Living Crisis allows these criminals to offer unsuspecting householders works at what appears to be an attractive price.

The Team continues to work in partnership with Police Scotland, particularly in relation to prevention campaigns, investigation and reporting to the Procurator Fiscal. The Team was involved in both local and national investigations and tactical operations. Much of Trading Standards work is focused on ensuring that businesses treat customers fairly to the benefit of both parties and so is collaborative in nature. However, doorstep fraudsters are organised criminals and require a “hard enforcement” approach.

Petroleum Licensing

The Team is responsible for ensuring the safe storage of petroleum spirit, mainly at retail filling stations. Petrol vapour is highly explosive and strict rules protect public safety. Officers worked with site owners and developers during the year on new builds and alterations as well as the ongoing monitoring of existing sites and the decommissioning of old redundant sites. In the past year the Team have engaged productively with the industry and the following are some examples of the types of requests and enquiries that were dealt with:

- Requests from businesses who have decided to no longer trade. Such engagements allow the petrol sites to be decommissioned safely for whatever their future intended uses may be. They are also safe if then left derelict.
- A request regarding a vital remote petrol filling station where equipment had reached the end of its life and petrol was not available for the community. This led to the installation of the first retail above ground petroleum tank in Scotland and a return to business.

Weights and Measures

One of the oldest forms of consumer protection, the use of weighing and measuring as a basis for trade transactions, underpins consumer confidence in the marketplace and ensures a level playing field for business. Such trade transactions, in a UK context, have an estimated value of £262 Billion, with the Highland portion of that estimated at £100s of millions.

During the year Trading Standards continued to respond to complaints, requests for business advice and chargeable service requests. The Team’s activities included the testing of weighbridges, petrol pumps, and domestic oil tankers. All of these are important for the Highland economy; ensuring accuracy and compliance is essential as consumers and businesses continue to be subject to difficult economic circumstances. Of note:

- As part of work to ensure accurate measure at a time of Cost of Living Crisis, road tankers that deliver domestic heating oil were tested for compliance, 18% non-compliances were found. These were rectified immediately, ensuring fair measure for customers.

- The Team provided chargeable approval services for new weighing equipment to an industry leader in fish processing undergoing a multi-million-pound upgrade to its facilities

Taxis and Private Hire Cars (“PHCs”)

Trading Standards is responsible for the enforcement of the licensing regime for taxis and PHCs. This involves monitoring the safety and standards of the vehicles and their drivers, and the treatment of customers. Trading Standards operates a “penalty points” system – unique in Scotland – whereby failings by drivers and operators are penalised. When a driver or operator reaches a set threshold of points, a report is submitted to the Licensing Committee for possible further action. Serious breaches are dealt with immediately. The Penalty Points System remains an effective way to monitor and control compliance in this trade sector. The team is also responsible for the testing of taxi meters to ensure suitability and accuracy. In the year two licence holders were reported to the Licensing Committee for a breach of the Penalty Points System. The Council has confidence that the Penalty Points System is working well to achieve compliance.

Animal Feedstuffs and Fertilisers

Officers undertake Official Feeds Controls for Food Standards Scotland, on a commercial contractor basis. The Team met its commercial obligations again in the provision of physical inspection of approximately 90 premises, alongside sampling and testing. These activities provide confidence in compliance, which was found to be high, meaning that the businesses producing, transporting and storing animal feed are responsible. The animals that are provided into the human food chain are receiving feed that is safe and of appropriate quality. The contract entered its final year and negotiations concluded to extend for a further two years.

Border Control Posts (BCP)

This is a new area of work for the Team that comes with no extra funding from Government. The new work will involve checks of a phytosanitary (plant health) nature with document checking, inspection and sampling of products of animal origin being imported into Great Britain at ports in the Highland Council area. The Team had significant engagement with Central Government and industry in preparation for a ‘go live’ in April 2024. This post-Brexit duty has resulted in the creation of a new BCP in addition to an existing BCP, the sub-contracting of an Official Veterinarian, and the establishment of a contract with a testing laboratory. Only one other local authority has this burden. It is likely a third BCP will emerge in 2024.

Appendix 3 – Operational Plan 2024/25

The Highland Council Trading Standards Team

Operational Plan 2024-25

Part 1: Policy

1. Trading Standards Team

The Highland Council's Trading Standards Team is part of the Council's Legal and Governance section of the Performance and Governance Service. It undertakes a wide range of statutory duties in relation to the regulation of trade and protection of consumers and reputable businesses. Since a restructure in 2016, the team no longer carries out any non-statutory functions.

2. Statutory Duties

The Council has numerous Trading Standards statutory duties from UK and Scottish sources. The full list of this legislation is contained in Annex D to the Council's Trading Standards Enforcement Policy.¹ The main subject areas are: Fair Trading; Doorstep Crime; Scams and Illicit Trade; e-Enforcement; Petroleum and Explosives; Safety of consumer products; Business Advice and Protection; Weights & Measures; Taxis and Private Hire Cars; Tobacco, Nicotine Vapour Products and Age Restricted Sales; Animal Feed & Fertiliser Quality Standards; Border Control Posts – Animal Feed.

3. Work activities

The work of the team is carried out in a number of ways, including:

- Investigation of breaches of consumer and trading laws: taking statements from witnesses, gathering documentary evidence, online research, CCTV, etc.
- Visits to business premises to check goods, equipment, records and procedures.
- Specific advice to individual businesses and general recommendations to trade sectors to ensure future compliance.
- Crime prevention activities targeted at both consumer and business audiences.
- Formal legal actions such as prosecutions, civil court enforcement orders, accepting formal legal undertakings, issuing statutory notices and issuing fixed penalty fines.

4. Priorities

The team has two guiding themes to focus its work activities:

- "Intelligence-led": in previous decades much Trading Standards work was carried out through untargeted cyclical "inspections" of all businesses in the area. This is not an efficient method of operation in the modern world and, in any event, there are insufficient resources to work in that way. Now, resources are targeted at areas of trade and specific businesses that have been involved in breaches of consumer and trading law. This approach is heavily dependent on information received from a wide variety of sources including: consumer complaints; information from agencies such as other Trading Standards offices,

¹ www.highland.gov.uk/downloads/file/11630/enforcement_policy

the Police, local CABs and Citizens Advice Scotland (CAS); “tip-offs” from businesses and the public; observations of officers.

- “Detriment”: work is focused on breaches of the law that cause significant harm. Consumer detriment is judged in a variety of ways, including: the amount of money involved in related transactions; level of physical danger to consumers; effect on vulnerable consumer groups; effect on rural consumers; effect on young people (e.g. age restricted products). Business detriment includes: high-value losses by local businesses; non-compliant companies gaining an unfair advantage over their law-abiding competitors; negative reputational effects on key Highland industries, e.g. tourism.

The analysis of intelligence and detriment is central to all apportioning of resources in the team on the basis of priority topics. The detailed priorities of this Operational Plan are guided by two authoritative goal-setting sources:

1. “Our Future Highland” Programme of The Highland Council 2022-27², in particular relating to the following high-level aims to promote:
 - A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland.
 - Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people
2. “Four Nations Priorities”³, published by the Chartered Trading Standards Institute (CTSI) for 2022 but carried over to 2024.

The work activities that put the priorities into practice in 2024-25 are in Part 2.

5. Regulators’ Codes

The contents of the Plan and all work carried out under it must be in accordance with the requirements of the UK Regulators’ Code⁴ and the Scottish Regulators’ Strategic Code of Practice.⁵ These are governed by the “five principles of Better Regulation”, i.e. work done is: Proportionate, Consistent, Accountable, Transparent and Targeted.

6. Partnership Working

The desired outcomes of this Plan can only be achieved through a series of well-established and confident partnerships with other organisations. There are a number of these, the most prominent of which are:

- Joint working and liaison with other local authority Trading Standards services and the specialist team at Trading Standards Scotland. These partnerships are long established and effective, including bilateral arrangements with individual authorities and wider networks that are often overseen by the Society of Chief Officers of Trading Standards in Scotland (“SCOTSS”).

² https://www.highland.gov.uk/downloads/file/4611/programme_of_the_highland_council_2022-27_-_english

³ <https://www.tradingstandards.uk/media/documents/news--policy/research/4-nations-priorities-infographic-final.pdf>

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/300126/14-705-regulators-code.pdf

⁵ <https://www.gov.scot/publications/scottish-regulators-strategic-code-of-practice/>

- Police Scotland: Highland Trading Standards has a close partnership with “N” Division of Police Scotland. This is particularly important in tackling the serious crime elements of Trading Standards work such as doorstep crime, scams and anti-counterfeiting. The partnership encompasses both intelligence sharing and operational matters and is one of the closest in Scotland.
- CAB/CAS: the Highland Consumer Partnership brings together Trading Standards with CAS and the eight Highland CABs to work jointly on cases, crime prevention campaigns and other initiatives. It plays a crucial part in connecting Trading Standards to Highland communities.
- NHS Highland: the Highland Tobacco Strategy brings the Council together with the NHS to tackle tobacco use in Highland. Trading Standards take the lead on enforcement of retail tobacco and NVP (“vaping”) laws, including combatting underage sales. In a separate topic area, the team works closely with NHS Highland on adult protection matters, such as providing call-blocking devices to protect vulnerable adults from scam calls.
- National bodies: very regular contact with Competition and Markets Authority (CMA), Office for Product Safety and Standards (OPSS), Advice Direct Scotland, Food Standards Scotland, the Chartered Trading Standards Institute, and the business departments of both Scottish and UK Governments enables Highland Trading Standards to influence national policy in favour of Highland interests and be well-informed of current practice and future developments.

7. Details

The particular initiatives and work activities are listed in Part 2. Many of these are Highland-specific although several involve collaboration with other local authorities (through SCOTSS). The “economies of scale” created by such joint working can be more effective in bringing about the outcomes desired. The team will only participate in initiatives that are relevant to the objectives of the Highland Council Programme. The “Cost Crisis” affecting both consumers and businesses is a prominent part of the planning for the year ahead and initiatives to tackle it in the Highlands are spread across various work activities

Part 2 - Detailed Work Activities

Topic	Fair Trading
Priorities	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> • A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland. • Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people <p>CTSI Priorities P(i) Protecting those at risk of the highest harm from the worst impacts of financial hardship. P(iii) Supporting businesses to diversify and adapt to new circumstances. P(iv) Helping businesses and consumers to successfully navigate the consequences of the UK's departure from the EU.</p>
Objective	<p>To ensure that Highland consumers are treated fairly by assisting legitimate businesses and taking firm action against rogue traders. To target resources on areas of highest consumer detriment and on topics for which intelligence shows that consumers are being treated unfairly. To reduce the supply of illicit goods in the Highlands, including counterfeit consumer products.</p>
Details	<p>The largest portion of this work involves investigating cases originating from consumer complaints and other sources of intelligence. All intelligence will initially be considered on a daily basis by the Duty Officer and further analysed at fortnightly tasking meetings. Cases will be progressed to an appropriate conclusion, including both formal disposals (e.g. prosecution or Enterprise Act Court Order) and informal disposals (e.g. written warning or advice to trader).</p> <p>The sale of counterfeit and other illicit goods has a variety of negative impacts on the Highlands: buyers receive shoddy and often unsafe products; legitimate local businesses unfairly lose out on sales; regional and national organised crime groups receive profits. Officers will follow up intelligence received to prosecute offenders and disrupt supply.</p> <p>In addition to the individual casework described above, there will be a series of planned initiatives to tackle areas of trade identified through complaints and other intelligence to require attention Trading Standards in the Highlands from.</p>

These are:

- Electric cars: SCOTSS Project. These vehicles are increasingly central to the lives of many consumers, especially those living in areas like the Highlands. Recent intelligence suggests that there can be a variety of problems with these, including battery ranges, performance in the Scottish climate and green claims. This project will build on preparatory research work from last year and involve the distribution of guidance to businesses and highlighting the issues through a publicity campaign. Inspection visits and other enforcement work will also be considered.
- Short-term events, shows and sales in the area: Highland project. This is the second year of a two-year project to systematically engage with these events across the board. Following last year's research and engagement, a full plan has been drawn up to govern engagement in 2024-25, with a range of approaches being taken dependent on the event, e.g. full visits, written guidance, observe complaints/intelligence received.
- Illicit Tobacco: Highland project, linked to national work. With intelligence across the country showing an increase in the supply of counterfeit and non-duty paid cigarettes and tobacco, Trading Standards authorities have been given access to HMRC's "Track and Trace" system to enable easy and rapid checks to be carried out. A programme of visits will be programmed throughout the year to inspect retail outlets in Highland.
- Bulk Heating Fuel: SCOTSS project. A major factor in the Cost of Living Crisis is the price of fuel, and off-grid oil heating plays an important role in their Highlands. Following weights and measures work on road tankers last year to ensure customers were not getting short measure product, this project will look at issues around pricing and terms and conditions that have been identified as potentially problematical. Local and national businesses will be advised of their obligations and enforcement action taken if necessary.
- Estate Agents: SCOTSS project. Practices in this industry have diversified in recent times with new matters to be considering in relation to online advertising and the provision of videos. These will be considered along with existing matters such as Home Reports and redress schemes and business contacted accordingly.
- Children's Nurseries Unfair Contract Terms: Highland Project. The pandemic has disrupted the provision of private childcare services. There has been reported some instances of where parents/guardians have been unable to access childcare services but have not been refunded fees where the childcare facility has

	<p>closed. The CMA has produced guidance for businesses on what their responsibilities and obligations are to consumers and also advice on retention of fees where the service cannot be accessed (e.g. partial refund). Local providers were contacted in 2022/23 and advised of their obligations. Phase II of this project will involve taking this engagement further and checking compliance.</p> <ul style="list-style-type: none"> • Counterfeit Alcohol: all fake goods cheat consumers but some also threaten their health and safety. A renewed UK national focus on the supply of counterfeit alcohol will be reflected at both Scottish and local level, with a systematic review of intelligence and consideration of appropriate reactive and proactive activities.
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Topic	Domestic Fraud
Priorities	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> • A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland. • Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people <p>CTSI Priorities P(i) Protecting those at risk of the highest harm from the worst impacts of financial hardship.</p>
Objective	<p>To protect vulnerable Highland consumers from doorstep crime through close collaboration with partner agencies such as Police Scotland, NHS and other Trading Standards authorities.</p> <p>To protect Highland consumers from scams perpetrated through a range of media - e.g. by letter, telephone, email, online - with particular attention to the effect on vulnerable consumers.</p>
Details	<p>Domestic Fraud encompasses both Doorstep Crime and Scams. Doorstep Crime refers to the activities of rogue traders offering home improvement services door-to-door. Scams can be perpetrated by a range of techniques, including by letter and by telephone cold-call. Although any householder could be scammed, these activities are often targeted at elderly and vulnerable people and the potential for consumer detriment is very high. The response of Trading Standards on this subject involves close partnership working with Police Scotland and adult protection services and includes:</p> <ul style="list-style-type: none"> • Reacting to complaints and intelligence received and taking appropriate action.

	<ul style="list-style-type: none"> • Continue to manage and monitor “callblocker” installations and the intelligence they produce. • Engaging in multi-agency operations to detect itinerant trading activity.
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Topic	e-Enforcement
Priorities	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> • A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland. • Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people. <p>CTSI Priorities P(i) Protecting those at risk of the highest harm from the worst impacts of financial hardship. P(iii) Supporting businesses to diversify and adapt to new circumstances. P(iv) Helping businesses and consumers to successfully navigate the consequences of the UK’s departure from the EU.</p>
Objective	<p>To recognise the importance of online sales to the people of the Highlands by focusing on the laws relating to the delivery of goods and services to remote communities. To help foster the growth potential of e-Commerce for new and existing Highland businesses.</p>
Details	<p>The term e-Enforcement encompasses a wide range of activities, from combatting serious and deliberate e-Crime to assisting local e-Commerce businesses to thrive through treating customers well. There are three specific initiatives for 2022/23:</p> <ul style="list-style-type: none"> • Social Media and e-Marketplace “Advertisement Libraries”: Highland project. Most web users are likely to be unaware that Google ads are uploaded into syndicated spaces created by web designers according to the user’s interests or whatever marketing criteria applies (the website will get a share of the proceeds for ‘clicks’). Users see such adverts on all sorts of websites, local, national and international. Most such adverts are fair and legal, but some have been identified as misleading or otherwise problematical. This project will consider how this industry affects Highland consumers, with a particular focus on locally-based businesses. The project will also seek to develop understanding of the array of ‘AD Libraries’ published by e-commerce and social media platforms and how these can be interrogated as part of an investigation.

	<ul style="list-style-type: none"> • Online Investigations Protocol: SCOTSS project. Highland officers have been heavily involved in the production of a protocol for internet investigations, along with colleagues from SOLACE, SOLAR and SLA-ISG (LA's information security group). Many of the standard approaches are already in operation in Highland but the protocol will now be implemented in full.
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Topic	Petroleum Licensing
Priorities	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> • A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland. • Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people <p>CTSI Priorities P(iii) Supporting businesses to diversify and adapt to new circumstances.</p>
Objective	To protect the Highland public by ensuring the safe storage of petroleum and the safe operation of petrol filling stations.
Details	<p>Including:</p> <ul style="list-style-type: none"> • Liaising with developers, site owners and others to ensure safety requirements are being achieved. • Responding to complaints and intelligence received. • Working with site owners, developers and others to decommission sites where necessary. • Participation in SCOTSS/PELG projects when available

Topic	Business Advice and Protection
Priorities	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> • A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland. • Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people.

	<p>CTSI priorities</p> <p>P(iii) Supporting businesses to diversify and adapt to new circumstances.</p> <p>P(iv) Helping businesses and consumers to successfully navigate the consequences of the UK's departure from the EU.</p>
Objective	<p>To help Highland businesses comply with consumer laws through advice and guidance and promote a culture of "economic success through best practice".</p> <p>To provide advice to Highland businesses who are the victims of unfair trading in their purchases.</p>
Details	<p>There are various strands to this work:</p> <ul style="list-style-type: none"> • Providing "enforcement by advice" through both reactive and proactive action, ensuring compliance in a measured and proportionate way. This mainly involves responding to specific queries from businesses about how they can comply with consumer laws. It also involves providing general guidance, e-newsletters and seminars where appropriate. • Investigating breaches of the Business Protection from Misleading Marketing Regulations 2008 and taking appropriate action. • Providing "1st Line" advice to local SMEs who make a complaint about purchases they have made from other traders. • Developing a more "commercial" approach to business engagement when appropriate through increasing opportunities to provide chargeable services. <p>There are three particular initiatives for 2024-25:</p> <ul style="list-style-type: none"> • Primary Authority Partnerships: these are income-generating contracts between businesses and local authorities for the provision of detailed "assured advice" on Trading Standards legal compliance. There are many of them which work very effectively and to the benefit of both parties in England and Wales. There are very few in Scotland but with most Trading Standards laws being reserved to Westminster, Primary Authority is equally applicable in Scotland. This project will involve the team approaching a range of local businesses to explain what the scheme can offer, with a view to signing up one or more of them to such a partnership. • Approved Trader Scheme: some local authorities run approved trader schemes, listing local businesses which have been vetted by Trading Standards and have made a commitment to treat their customers fairly. Member

	<p>businesses undergo a series of detailed background checks, including a review of their complaints history and agree to abide by a code of conduct and to be regularly monitored. This project will build on exploratory work carried out last year to implement such a scheme in the Highlands.</p> <ul style="list-style-type: none"> • Continue to review and improve free online business advice for traders based in the Highlands and ensuring business advice pages are clear, up to date with current legislative changes and easy to find.
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Topic	Product Safety
Priorities	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> • A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland. • Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people. <p>CTSI Priorities P(ii) Identifying and removing dangerous or harmful products from the market. P(iv) Helping businesses and consumers to successfully navigate the consequences of the UK's departure from the EU.</p>
Objective	To protect the Highland public from dangerous consumer products and help Highland businesses achieve high levels of consumer safety in their trading activities.
Details	<p>Including:</p> <ul style="list-style-type: none"> • Considering all consumer complaints and other intelligence relating to product safety and taking any action that is necessary to ensure the safety of Highland consumers. • Providing advice and guidance to Highland businesses on all product safety compliance matters. • Participating in SCOTSS Product Safety Group projects and other joint initiatives, to be considered on a case-by-case basis in terms of their relevance to the Highlands. • Proactive engagement with explosives storage licensees, including inspection visits where necessary. <p>Two specific initiatives for 2024/25 are:</p>

	<ul style="list-style-type: none"> • Construction Products – Highland project. In the wake of the Grenfell tragedy, there is a renewed national focus on the safety of construction products, with a new coordinating role and funding for the Office for Product Safety and Standards (OPSS). Following a year where which saw detailed engagement with a wide range of Highland-based producers, The next phase will focus on some product sampling and testing. • Medical devices: Highland project. Trading Standards has responsibility at retail level for a range of medical devices that play an important part in the lives of many consumers. Examples include thermometers, blood pressure monitors and pregnancy test kits. This project will systematically assess the supply of such products in the area and check for compliance.
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Topic	Weights & Measures
Priorities	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> • A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland. • Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people. <p>CTSI Priorities P(iii) Supporting businesses to diversify and adapt to new circumstances. P(iv) Helping businesses and consumers to successfully navigate the consequences of the UK's departure from the EU.</p>
Objective	<p>To ensure Highland consumers and businesses receive fair measure in their purchases. To provide an efficient high-quality calibration and weighing & measuring equipment service to business.</p>
Details	<p>Including:</p> <ul style="list-style-type: none"> • Maintaining metrological equipment in accordance with national standards. • Responding to complaints and intelligence received. • Responding to requests for service from Highland businesses. • Membership of the joint "Scottish Approval Body" for new equipment initial verifications. • Participating in specialist projects and other joint initiatives relevant to the Highlands.

	<ul style="list-style-type: none"> • Conduct market surveillance post Brexit to ensure compliance of new/imported equipment being placed on the market. • Conduct market surveillance in response to high value goods in pressured markets e.g. domestic and vehicle fuels at times of high prices to ensure equipment used to determine the price is accurate and performing as it should. <p>Two particular initiatives for 2024-25 that are under consideration are:</p> <ul style="list-style-type: none"> • Possible participation in a SCOTSS project on the sale of packaged goods. • A focus on the local licensed trade through a programme of inspections to local bars, pubs and hotels.
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Topic	Taxis & Private Hire Cars (PHCs)
Priorities	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> • A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland. • Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people. <p>CTSI Priorities P(iii) Supporting businesses to diversify and adapt to new circumstances.</p>
Objective	<p>To ensure that visitors to the Highlands and local residents enjoy high quality taxi and PHC services. To maintain public safety and fair trading standards of Taxis & PHC via the rigorous application of the Penalty Points System and ensuring the accurate calibration of taximeters.</p>
Details	<p>Including:</p> <ul style="list-style-type: none"> • Monitoring licensee performance via Penalty Points system. • Responding to complaints and intelligence received. • Responding to requests for Taxi meter testing. • Participate in arrangements for tariff changes when required.

Topic	Tobacco, Nicotine Vapour Products (NVPs) and Age Restricted Sales
Priorities	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> • A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland. • Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people. <p>CTSI Priorities P(ii) Identifying and removing dangerous or harmful products from the market. P(iii) Supporting businesses to diversify and adapt to new circumstances.</p>
Objective	<p>To protect young people in the Highlands by preventing the supply to them of harmful age restricted products. To promote public health through ensuring compliance with Tobacco and NVP legislation.</p>
Details	<p>Including:</p> <ul style="list-style-type: none"> • Carrying out necessary “proactive” work on age restricted sales, tobacco and NVPs as per specific Scottish Government funding. • Responding to intelligence received about underage sales and tobacco and NVP infringements by carrying out investigations and taking enforcement action where necessary. • Providing advice and guidance to Highland businesses on age restricted sales, tobacco and NVP compliance matters. <p>Specific initiatives for 2024/25 include:</p> <ul style="list-style-type: none"> • Continue to meet the high demand in the community to investigate allegations of legal breaches, particularly in relation to sales of vapes to children, taking all necessary actions including business advice, fixed penalty fines, banning orders and other court actions. • Continued proactive enforcement of tobacco and NVP legislation through inspection visits, publicity campaigns and test purchasing programmes. • Prepare for significant new legislation in relation to an expected ban on the sale of single-use vapes and restrictions on marketing, flavours and packaging.

	<ul style="list-style-type: none"> • Participate in the new Community Alcohol Partnership in Fort William, working closely with partners including the Police to promote good practices by traders in relation not all age restricted products. • Systematically update the Tobacco and NVP register by contacting businesses to assess whether they still sell the regulated products. • Continue to work with other partners which includes NHS Highland Planet Youth project and Operation Respect.
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Topic	Animal Feedstuffs & Fertilisers
Priorities	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> • A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland. • Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people. <p>CTSI Priorities P(ii) Identifying and removing dangerous or harmful products from the market. P(iii) Supporting businesses to diversify and adapt to new circumstances</p>
Objective	<p>To ensure compliance with quality standards for animal feed and fertilisers by the targeted surveillance of producers and feed businesses.</p> <p>To meet the requirements specified in the contract with Food Standards Scotland (FSS) for the delivery of Official Feed Controls.</p> <p>Providing specialist Service to neighbouring Local Authorities under contract.</p>
Details	<p>Including:</p> <ul style="list-style-type: none"> • Completing Food Standards Scotland (FSS) Official Feed returns. • Conducting an agreed programme of premises inspection and product sampling within Highland. • Conducting an agreed programme of premises inspection in CNES.

	<ul style="list-style-type: none"> • Responding to FSS feed incidents. • Providing advice and guidance to CNES in relation to ongoing feed matters. • Taking action as necessary regarding Fertilisers
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Topic	Border Control Posts – Animal Feed
Priorities	<p>Highland Council Programme-</p> <ul style="list-style-type: none"> • A Fair and Caring Highland: Working together to improve quality of life and opportunities for Highland. • Resilient and Sustainable Communities: Helping our communities to be prosperous, sustainable and resilient, making a positive difference to the lives of people. <p>CTSI Priorities P(ii) Identifying and removing dangerous or harmful products from the market. P(iii) Supporting businesses to diversify and adapt to new circumstances</p>
Objective	<p>To conduct new duties in respect of being a Port Health Authority for Animal Feed and related products. To conduct phytosanitary checks to ensure imported product is compliant with quality standards. To liaise with other agencies as necessary on BCP matters, e.g. DEFRA, APHA, FSS.</p>
Details	<p>Including:</p> <ul style="list-style-type: none"> • Completing agreed documentary, physical inspection and sampling checks on imported product. • Responding to feed importation incidents. • Preventing non-compliant feed from entering the inland arena. <p>A particular initiative for 2024-25 is to fully implement the new post-Brexit border checks regime, including the use of contractors as Official Veterinarians.</p>

