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# Summary of Submissions – P1053

# Food Safety Management tools

Food Standards Australia New Zealand (FSANZ) analysed all submissions in response to the Discussion paper released in February 2020.

**Summary of submissions to the P1053 Discussion Paper (February 2020)**

FSANZ released a [Discussion Paper](https://www.foodstandards.gov.au/code/proposals/Documents/P1053%20Consultation%20paper.pdf) in 2020, which provided background to FSANZ’s Proposal to consider additional food safety management tools for the food service and closely related retail sectors as part of a broader review of Chapter 3 and 4 of the Australia New Zealand Food Standards Code (the Code). A total of 18 submissions were received.

FSANZ outlined the proposed regulatory measures and called for information from stakeholders about these food safety management tools and feedback on whether the Code should be amended to mandate their use. In particular, information was sought on the potential impacts on businesses of mandating these measures, including if and how these tools will improve food safety outcomes. FSANZ also asked a range of targeted questions designed to elicit this information and to better understand the gap between current practice and the tools proposed.

The following information is a summary of submissions from the Discussion paper period.

Key themes identified from the submissions include:

* The regulatory measures identified in the Discussion paper were generally supported by stakeholders with nationally consistent implementation.
* Some submitters were aware that the proposed mandatory tools may be associated with implementation costs, but overall, submitters believed the benefits of the new measures would outweigh the costs.
* There was consensus that current food handler skills and knowledge are inadequate with many lacking a basic level of understanding. Submitters favoured a mandatory entry level food handler training that is nationally recognised and the completion of training before commencing employment.
* There was support for a nationally consistent and standardised approach to food handler and Food Safety Supervisor (FSS) requirements and training.

Submitters were supportive of FSANZ varying the Code to mandate the proposed package of regulatory measures, if the following is taken into consideration:

* A number of submitters believed training for food handlers and FSSs needs to be up-to-date, meet the intended purpose and take into account literacy, language, numeracy levels of the diverse staff working in food service businesses.
* Submitters suggested the development of a mechanism to regulate and monitor the quality of training provided by registered training organisations (RTOs).
* The implementation of a tiered, activity-based, risk management approach to evidence keeping measures using flexible and simple templates was considered to be most effective.
* Submitters expressed concern about applying an all for all approach to the application of regulatory measures to all in-scope businesses.
* The development of non-regulatory tools to support regulatory tools were noted.

Additionally, some submitters raised that FSANZ should include allergen management into the scope of P1053. FSANZ has included allergen management and the consideration of any related amendments to the Code within the scope of the broader Chapter 3 and 4 review project.