



ENVIRONMENTAL
HEALTH AUSTRALIA

#	Proposal	Decision	Feedback
1	<p>Category one regulatory and nonregulatory measures:</p> <ul style="list-style-type: none"> - FSS (Food Safety Supervisor) Certification - FHT (Food Handler training) of all staff handling potentially hazardous food (PHF) - E (Evidence) - evidence must provide temperature records (receipt and storage), cleaning schedules, pest management schedule - Non-Regulatory Tools - Food Safety Culture and Education 	Partially supported	<p>The proposed regulatory and non-regulatory measures for Category one premises is supported, however, could be strengthened by:</p> <ul style="list-style-type: none"> - mandating refresher training for FSS every 3 years where they hold an FSP (5 years if not holding FSP). - FSS training being a designated course under legislation to ensure consistency, depth and strength of course content. - Course content for FHT being defined and required for all staff with a certificate showing completion of an appropriate course. - the FSS, FHT and E requirements being Infringeable Offences - developing non-regulatory tools on specific topics such as egg safety etc.
2	<p>Category two regulatory and nonregulatory measures:</p> <ul style="list-style-type: none"> - FSS - food safety supervisor - FHT - food handler training - E - evidence must provide temperature records (receipt and storage), cleaning schedules, pest management schedule - Non-Regulatory Tools - Food Safety Culture and Education 	Partially supported	<p>The proposed regulatory and non-regulatory measures for Category two premises are supported, however, could be strengthened.</p> <p>It is recommended that:</p> <ul style="list-style-type: none"> - refresher training for FSS be required every 5 years. - FSS training be a designated course under legislation to ensure consistency, depth and strength of course content. - the FHT have defined course content and required of all staff with a certificate showing completion of an appropriate course. - Evidence should mandate temperature, cleaning, and pest management as a minimum - FSS, FHT and E requirements be Infringeable Offences - non-regulatory tools should be developed on specific topics such as egg safety etc.
3	<p>Category three regulatory and nonregulatory measures:</p> <ul style="list-style-type: none"> - No Regulatory Measures - Targeted education campaign 	NOT Supported	<p>The proposed regulatory and non-regulatory measures for Category three premises are NOT supported. The proposal could be strengthened by:</p> <ul style="list-style-type: none"> - mandating that FHT to be required for all staff handling the PHF - evidence should mandate temperature control including heating times and temperature to be an infringeable offence - non-regulatory tools should be developed to include product type specific topics such as heating pies, etc.

Other stakeholder views that are supported include:

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Submission for: Proposal P1053 – Food Safety Management tools

Thank you for the opportunity to comment on the P1053 – Food Safety Management Tools. Environmental Health Australia (Queensland) Inc has the following comments to offer.

FSANZ use a Category Risk Profile that is not currently used in Queensland. There is concern of the categorisation risk profile and how it translates to local government assessment, resourcing and monitoring of food premises particularly for regional, rural and outback Councils. To change their current risk profile to the FSANZ categories may require significant upgrade to their current computer systems which could be costly and timely.

The current QLD prioritisation provides for nursing homes and childcare centres and other industry areas that require an accredited Food Safety Program (FSP) which are classed as High Risk. This is often accompanied with discreet workflows and inspection timings. The remainder of the FSANZ Category One and all Category Two food premises are classed as Medium Risk which have a different schedule and workflow. We do not support the recommendation for bakeries be in a different category to cafes and restaurants as some bakeries can provide the same level of service as cafes and restaurants and should be subject to the same level of compliance. The FSANZ Category 3 is equivalent to the Queensland classification of a Low-Risk food premises.

The concept of developing non-regulatory measures such as Food Safety Culture and Education is supported. However, there are a number of concerns in relation to the review of Food Safety Management Tools that need to be addressed. These include:

- Will resources be provided to local governments to provide to businesses for the non-regulatory tools? Who is responsible for the development of these tools? Will there be an expectation on what local governments will provide? Will the resources be standardised and nationally consistent and available for all councils to utilise?
- A draft implementation strategy has been developed for businesses. Will an implementation strategy for local government be developed?
- It is recommended that criteria or guidelines be developed for Food Handler training to ensure consistency, especially when it is developed “in house”. What is considered adequate / appropriate?
- Will detailed training be provided for Local Government Officers on the proposed amendments including categorisation of businesses?

Please find below specific feedback relating to your preferred approach to each of the FSANZ Category Risk Profiles for regulatory and non-regulatory measures.

- any regulatory measures need to be proportionate to risk with minimal burden to industry;
- training for food handlers and FSSs needs to be up-to-date and offered in a range of formats in recognition of the diverse staff working in food service businesses;
- the quality of training provided by registered training organisations needs to be monitored; • simple templates should be available to support evidence-keeping measures; and • non-regulatory tools should be developed to support regulatory tools.

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