

Submission P1053 Proposal

It is noted that FSANZ use a Category Risk Profile that is not currently used in Qld. 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 our current risk profile to the FSANZ categories will require significant upgrade to our current computer systems which could be costly and timely.

Our current prioritisation provides for nursing homes and childcare centres, etc that require an accredited Food Safety Program (FSP) be classed as High Risk which has its own discreet workflows and inspection timings associated with it. The remainder of the FSANZ Category One and all of the Category Two food premises are classed as Medium Risk which run on different timings and workflows. It is further noted you have suggested bakeries be in a different category to cafes and restaurants - please note that some years ago a chain of bakeries in Brisbane were found extremely non-compliant because their classification had been dropped lower than a cafe - this is not recommended. In addition, bakeries can be quasi cafes. The FSANZ Category 3 is equivalent to our Low-Risk food premises.

We generally support the concept of non-regulatory measures such as Food Safety Culture and Education, however we would like to know how this will be undertaken. Is local government required to run information/education courses, send out information to food businesses etc.? More information on the logistical aspect of this and whether resources and training will be provided to local government to ensure consistency of messaging across Australia would be appreciated.

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

#	Proposal	Decision	Stakeholder Feedback
1	<p>Category one regulatory and non-regulatory measures -</p> <p>FSS (Food Safety Supervisor) Certification</p> <p>FHT (Food Handler training) of all staff handling potentially hazardous food (PHF)</p> <p>E (Evidence) - evidence must provide temperature records (receipt and storage), cleaning schedules, pest management schedule</p> <p>Non-Regulatory Tools - Food Safety Culture and Education</p>	Partially Supported	<p>We support the proposed regulatory and non-regulatory measures for Category one premises however believe they should be strengthened as follows:</p> <ul style="list-style-type: none"> - refresher training for FSS be required every 3 years where they hold an FSP (5 years if not holding FSP). - the FSS training be a designated course under legislation to ensure consistency, depth and strength of course content. - The FHT should have defined course content and required of all staff with a certificate showing completion of an appropriate course. - the FSS, FHT and E requirements be Infringeable Offences - non-regulatory tools could include specific topics such as egg safety, industry specific topics, etc.

#	Proposal	Decision	Stakeholder Feedback
2	<p>Category two regulatory and non-regulatory measures -</p> <p>FSS - food safety supervisor</p> <p>FHT - food handler training</p> <p>E - evidence must provide temperature records (receipt and storage), cleaning schedules, pest management schedule</p> <p>Non-Regulatory Tools - Food Safety Culture and Education</p>	Partially Supported	<p>We support the proposed regulatory and non-regulatory measures for Category two premises however believe they should be strengthened particularly in line with our comments regarding categorisation and bakeries above.</p> <p>We recommend:</p> <ul style="list-style-type: none"> - refresher training for FSS be required every 5 years. - the FSS training be a designated course under legislation to ensure consistency, depth and strength of course content. - the FHT should have defined course content and required of all staff with a certificate showing completion of an appropriate course. - the Evidence should mandate temperature, cleaning, and pest management as a minimum - the FSS, FHT and E requirements be Infringeable Offences - non-regulatory tools to include specific topics such as egg safety, industry specific topics, etc.
3	<p>Category three regulatory and non-regulatory measures-</p> <p>No Regulatory Measures</p> <p>Targeted education campaign</p>	Not Supported	<p>We do not support the proposed regulatory and non-regulatory measures for Category three premises and believe they should be strengthened in the following areas:</p> <ul style="list-style-type: none"> - FHT to be required for all staff handling the PHF - evidence of temperature control including heating times and temperature to be an infringeable offence - non-regulatory tools to include product type specific topics such as heating pies, etc.