

Submission to proposal P1053

We thank you for the opportunity to provide a submission in response to proposal P1053 on behalf of the City of Greater Geelong based in Victoria. Please see our comments below in relation to Proposal P1053.

General comments on proposed standard 3.2.2A

We strongly suggest rewording the new Food Standard Code so that it is written in Plain English to assist in clearer and easier understanding of the contents, both for authorised officers and also for food businesses.

We support the changes to increasing training requirements for food handlers and introducing refresher training for Food Safety Supervisors (FSS). Due to these changes, we expect authorised officers are likely to be onsite for longer during food safety assessments to ensure 3.2.2A has been met. This extra time burden may impact on food business owners in terms of higher registration fees to cover the extra time.

Specific comments on proposed standard 3.2.2A.

3.2.2A-2 Definitions

In 3.2.2A-2 'Definitions' section, under 'food safety training course' we propose that 'food contamination' is extended to say 'food contamination, including food allergens' to show the importance of allergens, rather than relying on the extended explanation in the accompanying Guide document.

We recommend 'reasonably available' as used in 3.2.2A-11 is defined to create clarity without having to refer to the implementation guidance, as it is not a clear statement to interpret. We suggest that it would include that the person must be 'frequently onsite and involved in food handling activities'.

We suggest the meaning of 'fund raising event' is expanded to help ensure sporting clubs and other not-for-profit groups are not captured in this definition.

Fund raising events can still pose a risk to public health. Minimum levels of food safety knowledge should be maintained. Online Food Handler Training (FHT) via 'Do Food Safely' is not cumbersome and should be required as a minimum. Within the City, we already recommend this training for volunteers of fund raising events. Minimum records, at least in the form of temperature control should also be included for these events.

3.2.2A -10 Food handler training (FHT)

We recommend FHT is delivered by a Registered Training Organisation (RTO) to ensure consistency in content across the country and help assist with identification verification of the student. There are numerous cases that we have become aware of in local governments in Victoria where one person completes the 'Do Food Safely' course multiple times on behalf of other staff who then receive the certificate and where the answers are posted online or in private group chats to save food handlers time and/or ensure a pass mark. If delivery through RTO's is not feasible, we would suggest that the state government free sites (such as 'I'm Alert' and 'Do Food Safely') have measures in place to help confirm the persons' identity to prevent other people completing the training on others' behalf.

3.2.2A-11 Food Safety Supervisor (FSS) training

We would also recommend a separate FSS be provided for each business where a proprietor owns multiple businesses. FSS who oversee multiple sites cannot be everywhere/oversee multiple businesses at the same time, and from our experience leads to a reduction in food safety culture and food safety.

3.2.2A-12 (1) Substantiating food safety management of prescribed activities

We would suggest amending the sentence to ‘...the food business must make **and use** a record...’ to indicate that it may be a living record that needs updating, filling out etc. rather than a template being created and not used.

Comments of the Implementation Guideline

Food handler training

To help businesses with assessing staff knowledge or skills, we suggest that a checklist for a business owner is included in the Guide to help them decide if the food handler does have the satisfactory skills and knowledge required without completing formal food handler training.

The Guide will need to be clear for business owners that only those workers who have suitable food handler training, skills and knowledge can do tasks other than cleaning, handling low risk foods, taking orders, and waiting tables. This will be difficult for those struggling to recruit staff, however, shows how vital a FSS who is frequently onsite is to oversee and train new staff.

Food Safety Supervisor

As the unit codes are listed in the Guide it will need to be updated every time units are superseded. We would recommend that rather than list units in the guide, direct businesses to a webpage with current units listed.