



Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604
AUSTRALIA

11 April 2022

RE: Submission – Proposal P1053 – Food Safety Management Tools (190-22)

The Australian Institute of Food Science and Technology (AIFST) is a not-for-profit organisation representing food industry professionals working in all facets of the food industry including food science, food technology, engineering, sensory, new product development, innovation, regulatory, QA, nutrition, microbiology, and food safety, as well as those in leadership positions within the academic, industry and private sectors.

AIFST's mission is to advance and inspire all food sector professionals through education, collaboration, and recognition, to champion a robust, innovative, science-based Australian food industry to meet future food needs.

AIFST has previously supported a review of Chapter 3 of the Australia New Zealand Food Standards Code (the Code) to ensure a consistent and current approach to through-chain food safety management in Australia. Specifically, AIFST supported a review to examine the potential for regulatory measures for food service and retail sector.

AIFST supports:

1. the two proposed draft food regulatory measures – a new draft Standard in Chapter 3 of the Code and a consequential variation to Standard 1.1.1 – to reflect a risk proportionate regulatory approach.
2. the proposed risk categorisation of businesses based on sector and handling activities
3. proposed **Option 3.2**: Food Safety Supervisor (FSS), Food Handler Training (FHT) and Evidence to substantiate food safety management (E)

Food Allergens as a food safety risk

AIFST also considers the proposed scope of the review needs to consider food allergens as a food safety risk. The paper is focused on the risk posed by food borne illness and does not seem to consider other types of food safety risks.

AIFST recommends FSANZ consider other types of food safety issues to ensure they are adequately reflected in the review.



Managing the risks associated with the presence of food allergens in ingredients and products is a major food safety challenge faced by food manufacturers at all levels of the supply chain.

The potential impact on a business if allergen management is not addressed thoroughly and robustly by a team with appropriate expertise is significant. Mislabelled allergens are a major cause of recalls, which are costly to implement and may have long term impact on both the brand and the overall business. A product recall can be extremely costly to a business with severe reputational loss that can take many years to recover from, if at all.

Thank you for the opportunity to provide this input to the Inquiry. If you require any further information, please do not hesitate to contact me.

Sincerely

