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Hi All,

Wollondilly Council's EHOs have reviewed the information supplied and make the following comments:

It is acknowledged in the FSANZ documentation that additional time will be required for authorised officers to undertake their inspections as we need to check compliance with the new proposed standard. Do we therefore need to consider increasing inspection fees?

Food handler training – the requirement for businesses to ensure that ALL food handlers have completed a food safety course is good in theory; however impractical red tape when it comes to regulating a business on food safety. I feel that it would be a better approach to have the business ensure that at least one FSS or adequately trained individual is at the premises at all times (or "reasonably available") as this would be more practical for EHOs to check, and many businesses have this in place already. The other issue with forcing all food handlers to have a certificate is that many food handlers are teenage kids, and placing an obligation on a minor to have attained adequate training is going to be difficult. The requirement also places the business in a difficult position that they may have to terminate staff.

It is not the role of an authorised officer to assess whether or not a food handler has undertaken an appropriate course, that covers all four required subject areas. How will this be addressed?

Further to the point above, the alternative requirement (to adequate training) for businesses is to ensure that ALL food handlers have adequate skills and knowledge. If a food handler has not undertaken a food safety training course, how are authorised officer's supposed to determine this for ALL staff?

We request that adequate training and workshops be run with authorised officers, well in advance of the commencement of this new standard.

I think it is a good move of the FSANZ to have in place that all states will accept fellow states food safety supervisor/training certificates. Particularly beneficial for mobile and temporary food vendors. All food handler training documentation should be accepted across all states.

Food Safety Supervisor – The term for the FSS to be 'reasonably available' need to be clarified. I.e. if the premises is a club bistro - Would it be adequate for the FSS to be the Bistro Manager, who is not usually in the kitchen but is generally always in the venue?

Consideration should be given to the inclusion of Childcare centres with regards to the requirement of a Food Safety Supervisor.

Evidence – The requirement for the keeping of records is again, good in theory – however, in a practical sense, most small scale kitchens or cafes do not have the time to keep records of every cool room and/or fridge; and, again although they should be checking food temps on receipt – this is something that is already regulated in the FSC (without the records). I do not think that keeping the record of food temps is going to be practical because, the food

business should already be checking and rejecting any potentially hazardous food that is received which is not at the correct temperature.

However, for some food businesses where potentially hazardous food is made intentionally in advance, such as sushi trains; or potentially hazardous food is made to be displayed for sale outside of temperature utilising the 2hour-4hour rule – for these types of businesses - the requirement for keeping temp control records may be considered appropriate and this will need to be clarified in the legislation.

Category classification of food premises

Category 1 food premises appear to be any premises that cooks potentially hazardous food and category 2 premises appear to be premises which plate up and serve potentially hazardous food. Category 3 has not changed and is essentially the same – all packaged food.

More detail, and training of authorised officers categories needs to be provided, as this appears to be a change to the current Category 1 – high risk and Category 2 – medium risk. The change would appear to put most food businesses into category 1, where as they would be classified as category 2 at present.

This change will also be reflected in the activities report at the end of financial year.

Kind Regards,

[Redacted Signature]

