

City of Onkaparinga Submission - FSANZ Proposal P1053 - Food Safety Management Tools

FSANZ Proposal P1053 – Food Safety Management Tools considers whether regulatory measures over and above existing general requirements should be mandated to manage food safety risks in food service and related retail sectors

The City of Onkaparinga Environmental Health team agree with a consistent approach to Food Safety across Australia as this makes it easier for businesses, particularly franchised businesses that have multiple outlets across Australia. This consistency prevents the confusion that can be attributed to not understanding local food safety laws.

- The introduction of these Food Safety Management tools will ensure that Environmental Health Officers are confident about the safety of food observed during their routine food safety inspections.
- Amending the Australia New Zealand Food Standards Code to include these additional tools is the quickest and simplest way to introduce these new measures for food businesses.
- Allowing a commencement period of 12 months enables Food Businesses' time to prepare their businesses and for their staff to attend training.
- The proposed training must be proportionate to the level of risk that the food business may pose to food safety. Some food handling and processing techniques pose a greater risk to food safety and these specialised techniques must be included within the training for higher risk businesses.

Certified Food Safety Supervisor for all high-risk food businesses

Current situation:

The code does not currently include requirements for any food business to have a Food Safety Supervisor.

Regulatory measure:

High risk food businesses will be required to have at least one certified Food Safety Supervisor, with certification requiring a successful completion of training that is competency verified. (i.e. includes a formal assessment).

Benefits:

- The Food Safety Supervisor would be trained to recognise and prevent risks associated with food handling
- Would need to understand the overall food safety processes of the business and how it applies to all staff.
- Impart their skills and knowledge onto other staff and strengthen the food safety culture, through improving food safety behaviour

Our position:

We are very supportive of the introduction of Food Safety Supervisors across all high-risk food businesses. Too often, we conduct routine food safety inspections where there are only junior team members present and those food handlers are unable to answer our questions. They do not have an understanding of the requirements to handle food safely have not been trained appropriately by the Food business proprietor.

Lack of training also presents a significant cost to the community not only in increased food poisoning incidents but also EHO resources retrospectively trying to educate food handlers following breaches of the Standards

Food Safety Supervisor Training must be easily accessible, as well as being reasonably priced to have minimal impact on small businesses. In South Australia, we currently do not have the requirement for Food Safety Supervisor training, so training providers would need to be introduced and accredited so that training is of high quality and consistent across Australia.

It must be made clear in the standards, whether a high-risk food business must have a Food Safety Supervisor present onsite at all times while the business is in operation.

Regulated Food Safety training for all food handlers in high-risk food businesses, such as restaurants, cafes, takeaway shops, etc.

Current situation:

The Code requires food handlers to have 'skills and knowledge' in food safety and food hygiene matters, however there are no specific training requirements.

Regulatory measure:

All high-risk food businesses would require their food handlers to have completed food handler training to demonstrate their skills and knowledge requirements.

Benefits:

- Food handlers would all receive consistent and relevant information to increase their knowledge about food safety
Their increased awareness of -should result in greater commitment to safe food handling practices, and reduce the need for close supervision

Our position:

We are very supportive of the introduction of regulated training for all food handlers working within high-risk food businesses. Quite often it is observed that staff are not aware of the simple hygiene requirements within the food business, such as how to clean and sanitise equipment appropriately. Regulated training must be easy to understand for young or uneducated workers. If the training is too detailed and complicated, food handlers will not understand and implement the required changes.

For maximum effectiveness access to training must also be easy for all food handlers to attend. It must be reasonably priced to ensure that low-income earners can also access

the training and it doesn't push workers from the industry because they can't afford the training. There are numerous free online food safety training options already available. These will need to be assessed and updated to ensure suitability with the proposed new requirements.

Currently, there are no formalised training requirements in South Australia for food handlers, so the introduction of this training will bring us in line with the other states and provide a consistent approach across the states.

There must be adequate timelines to allow all food handlers to attend the approved training and the cost of the training must also be considered, with costs kept to a minimum to make it accessible for all.

The frequency of the training should be determined – is it a once off training session or will it need to be updated every few years.

Training must be delivered in multiple languages, again ensuring that the training is accessible to all.

Any businesses that undertake high risk processing of food should have additional training to ensure that they have a good food safety understanding of how to keep that food safe. For example, manufacturing and use of extended shelf-life foods and food being prepared using Sous-vide. The training should include additional modules based on the processes that the business is undertaking, so that if a business introduces a new high-risk process, they can access a training module specific to that technique.

Evidence of essential control measures and documentation (e.g. monitoring and record keeping of food temperatures)

Current situation:

The keeping of records, documentation and other records associated with food safety is not mandated.

Regulatory measure:

High-risk food businesses will be required to demonstrate evidence to support the management of key activities essential to produce and maintain safe food. Records will need to be kept for:

- Food processing and the 2 hour/4 hour rule
- Temperature control
- Cleaning and sanitising
- Calibration and maintenance of equipment
- Evidence that additional high-risk activities are managed e.g. raw egg products and sous vide

Benefits:

- Businesses will be able to better monitor potential hazards and detect if safety parameters have been breached
- Businesses will be able to easily demonstrate compliance to an EHO

Our position:

We are very supportive of records and improved documentation requirements for food businesses.

EHOs are often asking food handlers how long food has been stored out of temperature control, how it has been cooled/reheated and how long the food has been stored for. Food handlers answer these questions without having any evidence to prove that what they are saying is factual.

Records will provide EHOs with more confidence in the safety of the food and a greater understanding of all the steps that the food has gone through before it's served to the customer.

Records should be dated and signed by the food safety supervisor/responsible staff member to assist businesses with monitoring of records and identifying staff training needs.

Records should also include the requirement to date label when batches of food are prepared, for example gravies and sauces that are made, cooled and then kept in the cool room for several days. Containers of these types of foods should be clearly labelled with the date that they were prepared so that staff can ensure good stock rotation practices and that the food is still safe to use.