



Food Safety Management Tools – Submission to FSANZ – City of Charles Sturt

Stakeholder key considerations:

- **any regulatory measures need to be proportionate to risk with minimal burden to industry**

We would consider the proposed regulatory measures to be appropriate when balancing the public health risks and the burden this would place on industry.

It is good that the proposed measures are targeted at the highest risk food business sectors and the requirements are staged to avoid any unnecessary burden on lower risk businesses.

- **training for food handlers and FSSs needs to be up-to-date and be offered range of formats in recognition of the diverse staff working in food service businesses.**

We would strongly request that training is available in different languages and there are options for online learning and in person learning. We would have concerns with businesses relying on in-house training methods where there is not a structured approach as this could lead to poor outcomes in terms of training that is delivered in house and the inability for Authorised Officers to verify that training has occurred. It is acknowledged that some businesses may be able to deliver training in-house and satisfy this proposed requirement however we would support external learning being made a requirement.

It should be acknowledged that there is a high turnover of staff in food service businesses so it should be reinforced that the training is required before commencing food handling activities.

- **the quality of training provided by registered training organisations needs to be monitored**

We would request that training organisations are registered and that there is a mechanism in which standards of training for these providers are verified and audited. There should also be a way in which substandard training can be reported to an agency to investigate and require corrective action to be made to training courses.

- **simple templates should be available to support evidence-keeping measures;**

We strongly support having simple templates available to support evidence keeping. The templates available in Safe Food Australia are useful however not all businesses will be able

to pick these documents and use them. There should be an option for a checklist of all check/records required for a one-day or one-week period which a business can keep and make available. There should be a business support pack which has unique templates for complex food processing activities (e.g. sushi, sous vide, yiros meat, raw egg products, acidification, Chinese BBQ duck / pork, cook-chill) which provide further prompts and checks for businesses to complete. There should be a template for recording dishwasher temperatures and further clarity about evidence keeping/procedures for Standard 3.2.2 Clause 7(2) Cooking.

- **non-regulatory tools should be developed to support regulatory tools.**

It should be acknowledged that there are many businesses that operate on a very small/small scale that will struggle to implement these changes. We find that these businesses have a frequent turnover of staff, may not speak English as their first language and are likely unaware of these proposed regulatory measures and who have not provided feedback.

There should explanatory guides and reference tools that we can distribute to businesses to explain the changes that are to occur. It is imperative that the new Standards and supporting tools are written in a clear, concise manner and avoid the use of jargon and complex words (e.g. the word 'substantiating').

Many businesses will be unable to develop standard operating procedures and will require significantly assistance and guidance. It would be greatly beneficial if examples were put together with reference for businesses to use and adapt from. It should be recognised that Authorised Officers will need guidance to ensure consistency in application of the new Standards.

General comments in relation to Standard 3.2.2A

- Enforcement and monitoring of the new Standard 3.2.2A will result in longer inspections to enable assessment of training and records / procedures. In their current capacity, Officers will not be able to continue to maintain their regular inspections when this level of assessment is required during inspections. A resource impact statement on the introduction of the new Standards on the Local Government sector is recommended to aid in justifying increasing resource levels where applicable.
- State Food Act legislation does not support Councils in administration of these new Standards. For example, in South Australia there is a notification system for food businesses as opposed to a licensing or registration system which means that Officers will not have up to date details of the business before starting the inspection and not information about the food safety supervisor or whether the appropriate training has been completed. In addition,

Councils will not be able to maintain current lists of food safety supervisors and verify training requirements are being met during inspections. A Nationally consistent food business registration system is encouraged to support the consistent application of the Standards, which should include Food Safety Supervisor details and the onus on the business to accurately maintain this information on an ongoing basis.

- Consistent enforcement and monitoring of these Standard 3.2.2A must be considered as EHOs will undertake assessment of nation-wide chains and may come across issues where the Standards are interpreted differently.
- There should be consistent application and risk assessment of food business categories such as petrol stations which range from retail only to businesses that offer full food service type operations (e.g. On The Run style businesses).
- There needs to be clarity about how this Standard will interact with Standard 3.3.1 and Standard 3.2.1 – in particular with Food Safety Supervisor requirements in aged care, delivered meals and child care centres.
- We have adopted a risk classification approach to our food businesses which are rated from P1, P2, P3 to P4. It is unclear how Category 1, Category 2 and Category 3 businesses would be required to be rated along side our existing risk classification system.
- Is it unclear how requirements for evidence / procedures would be required for allergen management.
- CALD communities will require significant support with these changes, especially a large gap has been determined between what SA currently does and what other states and territories' currently do.
- FSS “reasonably available” definition, page 10 Example 2: It may be inappropriate for only 1 FSS (also the proprietor) between two food “neighbouring” businesses. It should be clear that a FSS must be available during any food handling activities (?)