

11 April 2022

Food Standards Australia New Zealand
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via email: submissions@foodstandards.gov.au

ARA RESPONSE TO PROPOSAL 1053: FOOD SAFETY MANAGEMENT TOOLS

The Australian Retailers Association (ARA) welcomes the opportunity to comment on new food safety management tools for the food service and food retail sectors, as outlined in Proposal 1053.

The ARA is Australia's oldest, largest, and most diverse peak retail body, representing a \$360 billion sector that employs 1.3 million Australians. We represent the full spectrum of Australian retail, from our largest national and international retailers to our small and medium sized members, who make up 95% of our membership.

In respect of this consultation, the ARA is proud to represent Australia's largest Quick Service Restaurant (QSR) groups including McDonalds, Kentucky Fried Chicken, Craveable Brands, FoodCo, Minor DKL and Starbucks.

Our members are committed to food safety management and understand the importance of robust safeguards given the impact an outbreak of foodborne illness can have on consumers, particularly those who are more vulnerable to such illnesses. It is therefore critical that the regulatory framework strikes the right balance between providing consumer confidence in prepared food products and ensuring fit-for-purpose regulation that is not overly burdensome.

In principle, the ARA supports the proposal to mandate the use of three food safety management tools by inclusion in The Australia New Zealand Food Standards Code (the Code) to be implemented on a risk-proportionate basis across the three broad categories of food service businesses.

It is important that industry members are included in further consultation around the development of the standards with the core objectives of industry being:

National Consistency

- A consistent national regulatory framework for food safety is important for retailers in the food services business as it enables efficient and effective compliance measures as well as delivery of consistent national training across state and territory borders.

Adequate food safety tools

- The proposed changes will apply more stringent requirements to some businesses. It is worth noting that our larger members would already have systems in place that reflect best practice. It is important that the mandating of any changes consider the significant and substantial investment that these members have made in their food safety management tools and training programs.
- It is also important that the increased regulatory burden and associated costs of implementation are balanced, proportionate and reasonable for smaller businesses that may only have a few employees. As noted in the consultation paper, these businesses are often relatively small with space constraints, time pressures and high staff turnover. While these challenges potentially heighten food safety risks, they also make the need for consistent and clear regulation more critical.

Adequate training resources



- As a Registered Training Organisation (RTO 4049) the ARA would be very interested to discuss the potential of designing and designing training programs that raise awareness about the proposed food safety management tools, in a cost-effective, retail-centric manner.
- One of our members has also noted that while they provide internal food handler training that is tailored to their business, employees are still required to undertake the external training, generally offered at State or local government level. It would be more effective and efficient if internal food trainer handling programs could be approved under the regulation to avoid this unnecessary duplication.

Finally, the implementation of regulatory changes must always be supported by a comprehensive education and awareness campaign. The provision of further educational materials and templates to support the draft guidance, particularly with translations into relevant community languages, would be most helpful, particularly for smaller food service businesses.

Thank you again for the opportunity to comment on these proposed changes. Any queries in relation to this submission can be directed to our policy team at [REDACTED]

Yours sincerely,

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