

15 March 2022

The Proper Officer  
Food Standards Australia New Zealand  
PO Box 5423  
KINGSTON NSW 2604

To the Proper Officer

**RE: SUBMISSION TO PROPOSAL P1053 – FOOD SAFETY MANAGEMENT TOOLS**

This submission is related to Proposal P1053 submitted by the Manager of City Standards and Compliance, [REDACTED] on behalf of Campbelltown City Council, Corner Queen and Broughton Streets, Campbelltown NSW [REDACTED].

Campbelltown City Council has reviewed the proposed amendments to be made to the Food Standards Code by FSANZ. The proposed changes including: food businesses being re-categorised as category one and category two businesses and the introduction of the new regulatory measures requiring Food Safety Supervisors, Food Handler Training and, substantiating food management are welcomed inclusions to the Food Standards Code.

Residing in NSW, Campbelltown City Council has been regulating the Food Safety Supervisor requirement under the Food Act 2003 and the Food Regulation 2015. The implementation of the Food Safety Supervisor program has been fortified over time and many, if not all businesses new and existing acknowledge this requirement prior to operation. This is a welcomed addition into the Food Standards Code.

Whilst this is seen as a great initiative, the Food Safety Supervisor program does appear to have some limitations which have been identified over time within our local government area. These limits include only one trained FSS being required per premises and not requiring an FSS to be on-site at all times leaving potential gaps in food safety operations within businesses.

These gaps in the business will prevent the effective day to day management of food safety practices, particularly in small scale businesses where Food Safety Supervisors may be non-English speaking or a non-influential member of the family or workforce.

A mandated requirement in the Food Standards Code for Food Handler Training in addition to that of the already existing 3.2.2 Division 2 – General requirements – 3 Food handling – skills and knowledge is welcomed. Requiring Food Handler Training for those who are in food handler roles will assist in the education and training beyond skills learnt on the job. Mandating the training for staff members is a welcomed effort in improving food safety.

The accessibility to training is considered to be a serious issue for implementing the requirement for Food Handlers to undertake training. Campbelltown City Council currently provides free training for food premises in our LGA through the IM ALERT subscription at a cost to Council. Campbelltown City Council EHO's have raised concerns that if this program was not provided how members of our food community would maintain suitable access to training to meet the mandated requirement to train their food handlers.

Mandating training for food handlers may also result in increased administration or inspection costs to businesses if Councils continue to fund free access to food handler training programs. Further consideration should be given to seek other alternatives to provide effective free training in consideration with this mandate.

The third regulatory approach for category one businesses Substantiating Food Management Practices has a significant impact on the regulatory inspections undertaken by EHO's.

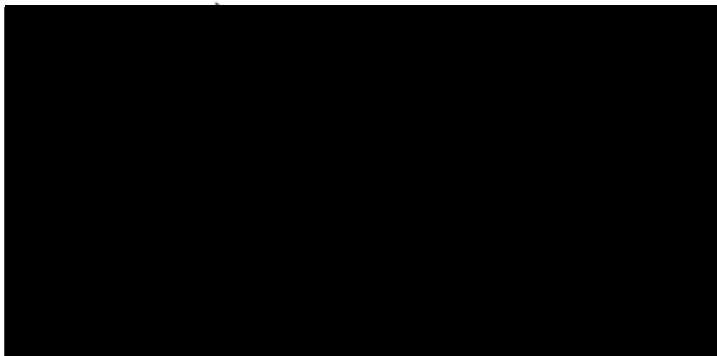
Premises are frequently inspected and subject to a rigorous review of business practices by EHO's. The implementation of additional record keeping requirements for businesses and review of these by EHO's is an onerous task to add to inspections. In particular it is anticipated this would increase inspection times and increase regulatory action against businesses who fail to comply. While on merit it is and has always has been best practice for record keeping within businesses. Mandating this requirement will have significant impact on EHO's and businesses alike. Notwithstanding Council acknowledges that resources are available and already exist for businesses to facilitate record keeping practices required by this mandate.

Campbelltown City Council considers the proposed amendments to the Food Standards Code to be worthwhile changes that will assist Environmental Health Officers to inspect, regulate and improve food safety across all levels of food businesses.

The national amendments will provide consistent management and approach to all food businesses across jurisdictions. Campbelltown City Council has highlighted some issues for consideration in this submission but supports the proposed amendments.

For further information, please contact [redacted] on [redacted] or [redacted] by [redacted] and [redacted].

Yours sincerely

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