

**7 August 2015**  
**[17–15]**

## **Call for submissions**

### **Review of Safe Food Australia**

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This consultation paper has been developed by Food Standards Australia New Zealand (FSANZ) to seek input from stakeholders, particularly from local governments and food businesses, on a review of the Safe Food Australia guideline.

FSANZ is calling for submissions on the attached consultation paper to help us progress the review.

For information about making a submission, visit the FSANZ website at [information for submitters](#).

All submissions on applications and proposals will be published on our website. We will not publish material that is provided in-confidence, but will record that such information is held. In-confidence submissions may be subject to release under the provisions of the *Freedom of Information Act 1991*. Submissions will be published as soon as possible after the end of the public comment period. Where large numbers of documents are involved, FSANZ will make these available on CD, rather than on the website.

Under section 114 of the FSANZ Act, some information provided to FSANZ cannot be disclosed. More information about the disclosure of confidential commercial information is available on the FSANZ website at [information for submitters](#).

Submissions should be made in writing; be marked clearly with the word 'Submission' and quote the project name Review of Safe Food Australia. While FSANZ accepts submissions in hard copy to our offices, it is more convenient and quicker to receive submissions electronically through the FSANZ website via the link on [documents for public comment](#). You can also email your submission directly to [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au).

There is no need to send a hard copy of your submission if you have submitted it by email or via the FSANZ website. FSANZ endeavours to formally acknowledge receipt of submissions within 3 business days.

### **DEADLINE FOR SUBMISSIONS: 6pm 18 September 2015**

Questions about making submissions can be sent to [standards.management@foodstandards.gov.au](mailto:standards.management@foodstandards.gov.au).

Hard copy submissions may be sent to one of the following:

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# Executive summary

[Safe Food Australia](#) is an explanatory guide to the food safety standards that are in Chapter 3 of the *Australia New Zealand Food Standards Code*:

- 3.1.1 – Interpretation and Application
- 3.2.2 – Food Safety Practices and General Requirements
- 3.2.3 – Food Premises and Equipment.

Safe Food Australia was developed to support the introduction of these standards when they were released for comment in July 2000. Since its publication, Safe Food Australia has been widely used by all state and territory food enforcement agencies as a benchmark for understanding and implementing the food safety standards. It is also used by food businesses to assist them in producing safe food.

FSANZ is reviewing Safe Food Australia to address current food safety issues and trends, provide more guidance for mobile vendors and home-based vendors and update the evidence referenced in the guide. FSANZ will also consider the format and delivery (e.g. provision on a mobile device).

The scope of the review does not extend to varying Standards 3.1.1, 3.2.2 and 3.2.3.

FSANZ is seeking input for the review of Safe Food Australia, particularly from local government and food businesses. We welcome your feedback, particularly in terms of:

- identifying which areas need updating and how
- providing real-world examples to reflect current food trends (e.g. including foods from different cultures, modern equipment)
- providing guidance materials.

Some questions have been developed to help target the provision of information and comment and are provided below. Comments can also be provided in your own submission online, or via email or hard copy.

# 1 Background

Safe Food Australia is a guide to implementing safe food handling practices covered by the following three food safety standards in the *Australia New Zealand Food Standards Code*:

- 3.1.1 – Interpretation and Application
- 3.2.2 – Food Safety Practices and General Requirements
- 3.2.3 – Food Premises and Equipment.

The food safety standards replaced existing state and territory food hygiene regulations in August 2000. Their adoption in the Food Standards Code represented the first time that Australia had agreed to nationally consistent requirements for food safety practices, and food premises and equipment.

During development of the standards, which are described as outcome-based, there was strong support for a guidance document to be written to support their implementation. The food hygiene regulations that these standards replaced were highly prescriptive. There was therefore a concern that the outcomes-based food safety standards could be interpreted inconsistently across jurisdictions. The purpose of Safe Food Australia was to:

- explain, in plain language, the outcome that the standard is intended to achieve
- provide examples, to show how the requirements can be applied
- provide additional sources of information to help business and enforcement agencies understand and comply with the requirements.

The current version of [Safe Food Australia](#) is on the FSANZ website.

## 1.1 Why is FSANZ reviewing Safe Food Australia?

The first edition of Safe Food Australia was released for comment in July 2000 and a second edition addressing feedback was published in January 2001. No further updates have been made since that time. However, there have been two significant changes to the Standards subsequently:

- A new definition for 'Vehicles used to transport food' was inserted in Standard 3.1.1 in 2005 to clarify that this included shopping trolleys.
- Standard 3.2.2 was amended in 2012 to allow a food business to permit a companion dog that is not an assistance animal to be present in an outdoor dining area.

Since the food safety standards were gazetted and Safe Food Australia was published, primary production and processing standards have also been developed for seafood, poultry, meat, dairy, eggs and seed sprouts. The primary production and processing standards place, to varying degrees, obligations on processors of these foods to comply with Standards 3.2.2 and 3.2.3.

# 2 The review process

## 2.1 Scope and timing of the review

FSANZ proposes reviewing Safe Food Australia over the next 12 months. Work will focus primarily on:

- updating information to capture current food safety issues and trends;
- including the amendments made to Standards 3.2.1 and 3.2.2 in relation to shopping trolleys and companion dogs
- looking at format and delivery (e.g. provision on a mobile device).

The scope of the review does not extend to amending Standards 3.1.1, 3.2.2 and 3.2.3.

## **2.2 Areas already identified for improvement**

Preliminary advice has been sought from state and territory food regulatory agencies on areas of Safe Food Australia requiring review. This has identified a number of key areas for improvement:

- updating examples to reflect current food trends and real scenarios
- including information on processing methods now more widely used (e.g. sous vide, confit, ageing meats) , including references to critical limits where appropriate
- including a separate section for mobile, temporary and home-based food businesses
- providing additional guidance on the use of time as a control, particularly in relation to the '4- hour/2-hour rule'
- including additional information on the use of other controls such as pH (acidification)
- updating the information provided on food recall in line with the most recent edition of the Food Recall Industry Protocol
- including additional information on sanitising
- deleting outdated or obsolete material such as Appendix 2 (business notification forms)
- including references to jurisdictional guidance materials where appropriate.

## **2.3 Stakeholder input required**

We welcome your contribution to the Safe Food Australia review, particularly to:

- identify which areas need updating and how
- provide real-world examples to reflect current food trends (e.g. including foods from different cultures, modern equipment), and to
- provide additional guidance materials.

You are invited to complete the questionnaire below **and/or** provide your comments in a separate document or email.

### **2.3.1 Questions**

These questions have been developed to help target the provision of information and comment on the review of Safe Food Australia. It has been based on initial advice received from state and territory jurisdictions.

<b>1. Your contact details</b>
<b>2. General comments</b>
What aspect of the guidance provided for each standard in Safe Food Australia do you consider needs change?
<b>Standard 3.1.1 – Interpretation and Application?</b>
<b>Standard 3.2.2 – Food Safety Practices and General Requirements?</b>
<b>Standard 3.2.3 – Food Premises and Equipment?</b>
<b>3. Examples in Safe Food Australia</b>
Examples are used throughout Safe Food Australia to show how the requirements can be interpreted and applied. Which examples should be updated, replaced or deleted and why?
If additional or alternate examples are needed, what text should be included?
<b>4. Current food safety issues/trends</b>
What current food safety issues/trends should be addressed in Safe Food Australia?
<b>5. Mobile and home-based vendors</b>
What additional guidance is needed for mobile vendors?
What additional guidance is needed for home-based vendors?

<b>6. Using time as a control for potentially hazardous food (Appendix 1)</b>
What issues have arisen with the '4-hour/2-hour' rule?
What additional guidance is required when using time as a control?
<b>7. Appendix 3 – Cooling of meats after cooking</b>
What changes are needed to Appendix 3?
<b>8. Appendix 4 – Cleaning and sanitising surfaces and utensils</b>
What changes are needed to Appendix 4?
<b>9. Other comments</b>
Do you have any other comments you wish to make on the review of Safe Food Australia?