

8 April 2022

Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604

By email:
submissions@foodstandards.gov.au

Dear Sir/Madam,

Submission to proposal P1053 Food Service Management Tools – Food Standards Code

Thank you for the opportunity to comment on the proposal to amend the Australia New Zealand Food Standards Code (the Code) which aims to introduce nationally consistent food safety management regulation.

The City supports the intent of these changes, which will help food businesses enhance their food safety practices through the use of food service management tools, delivering safer food to consumers and supporting improved business and consumer confidence.

The City makes the following two recommendations based on the proposed changes.

Recommendation 1 – That food handlers working for mobile voluntary services be required to undertake food safety training.

At present, mobile voluntary services are not regulated under NSW food legislation as they do not sell food. However, these services serve food to vulnerable populations, including people experiencing homelessness, which presents a significant food safety risk is left unregulated.

In 2021, the City of Sydney surveyed 150 people accessing mobile voluntary services across the city. The majority of respondents were either living in social housing (45%) or were sleeping rough (30%) at the time of the survey. Most respondents reported that they regularly accessed mobile voluntary services, with 75% accessing services most days.

Of significance, 14% reported being sick with food poisoning after eating food provided by a mobile voluntary food service within three months of the survey.

Last year, the City together with the NSW Food Authority, delivered a free, online two-hour food safety training workshop for mobile voluntary services operating across the City. Nineteen people attended the training from ten different organisations. Only one of the 19 participants reported that they had attended food safety training. In addition, all 10 organisations reported serving potentially hazardous foods.

Based on the vulnerability of people consuming food served by mobile voluntary services and supported by the City's research, food handlers within these services should be required to undertake food safety training.

Recommendation 2 – That all persons handling potentially hazardous food undertake regular food safety training irrespective of their industry experience and/or skills and knowledge.

In NSW, food handlers are not required to undertake food safety training as a prerequisite for preparing potentially hazardous food. The City believes that this is a significant risk and that ongoing food safety training, regardless of industry experience or existing skills and knowledge, should be mandatory for all food handlers.

Poor handling of potentially hazardous foods due to a lack of skills and knowledge increases the risk of food poisoning.

Continuing to allow food handlers to rely upon pre-existing skills and knowledge increases the potential for inconsistency in interpretation and application of this requirement. It also means there is no minimum standard for people handling potentially hazardous food.

Mandatory ongoing food safety training for all food handlers ensures that everyone within the industry is provided with regular, up-to-date training which would include any recent changes within the industry or requirements.

Food safety training is available online and free of cost, so poses minimal impact on business.

To speak to a Council officer about this submission, please contact [REDACTED].

Yours faithfully,

[REDACTED]