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Good afternoon,

Townsville City Council has reviewed the proposed changes to the Food Standards Code and wishes to provide written submission on these changes:

- The food business categories don't appear to consider other risk factors including size of the business (i.e., the volume of food prepared/served), or vulnerable populations (e.g., child care, aged care, etc.).
- The proposed 12 months period for businesses to comply with the new standard when gazetted would be insufficient time to ensure those affected fully understand their obligations and to implement the appropriate procedures and controls. Furthermore, 12 months would be insufficient time for Council to prepare and amend internal processes and procedures to accommodate the changes to the standard. The increase in workload would also need to be thoroughly considered to ensure Council is appropriately resourced.
- In support of changes to the standard to mandate food handler training however it should be considered to further strengthen this clause to include more defined training courses or programs, or provide regulatory authorities with the ability to mandate acceptable competency standards (e.g., all food handlers must complete 'I'm Alert' training as a baseline standard unit of competency).
- In support of the definition in the guidance document regarding FSS. It should however be considered to strengthen the clause in the standard in reference to this guidance document and provide regulatory authorities with the ability to enforce stricter requirements for FSS, particularly in regards to availability of the FSS.

Please let me know if you have any questions about the above comments.

Kind Regards,

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