

5 April 2022

Standards Management

Food Standards Australia New Zealand  
[submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

## **Re: Call for submission – Proposal P1053 – Food Safety Management tools**

Thank you for the opportunity to provide a submission for Proposal P1053.

This submission includes comments from the NT Health - Public Health Directorate and the Environmental Health teams from the Top End and Central Australia regional service areas.

- **NT Health is committed to the implementation of nationally consistent food safety management tools and supports the proposal of Standard 3.2.2A**
- **NT Health supports the preferred option 3.2 for Category 1 businesses**
- **NT Health supports the preferred option 3.1 for Category 2 businesses**
- **NT Health supports the preferred option for no regulatory measures for Category 3 businesses**

NT Health has reviewed the Food Standards Australia New Zealand (FSANZ) proposal and is in support of regulated food safety management tools through the implementation of Standard 3.2.2A. *Supporting document 2 - The risk profile for Australian food service and related food retail businesses* provides evidence that this sector is linked to a large portion of foodborne illness across Australia. The categorisation of food service businesses provides for a risk proportionate approach to the proposed tools, where by businesses with higher risks have more stringent requirements and more tools to manage their risks, which NT Health is supportive of.

NT Health is a member of the Implementation Subcommittee for Food Regulation (ISFR) and represented on the Food Safety Management Working Group (FSMWG) and is committed to the priorities of the Australian National Foodborne Illness Reduction Strategy 2018-2021+. NT Health supports the inclusion of non-regulatory measures in addition to the proposed regulatory measures. Any existing industry resources from other states that already have these tools implemented should be readily applied nationally. This will be of great benefit to food regulators and businesses that have not previously been familiar with these measures.

*Supporting Document 1 – Consultation Regulation Impact Statement* identifies the gap analysis for each proposed tool. Similar to most other jurisdictions, the Northern Territory have identified gaps on the regulated food safety management tools for FSS, food handler training or evidence. Environmental Health Officers have however always been proactive in promoting food handlers to complete some form of training to acquire the appropriate skills and knowledge to safely handle food.

The Public Health Directorate consulted with our food regulatory teams within the Public Health Units including staff servicing remote aboriginal communities. Collectively the preferred option is

supported for nationally consistent management tools for food businesses. Feedback was received on the considerations for the differences in implementation across regional and remote community settings. Remote aboriginal communities face more challenges in areas such as staff turnover, digital and data accessibility, lower literacy levels and additional costs associated with operation in a remote setting compared to urban areas. Assistance nationally on targeted resources for remote community settings may need to be considered further to ensure any FSS and food handler training is able to be successfully delivered and completed in these settings.

Questions received from Environmental Health Officers regarding any standard implementation;

- If remote businesses cannot access training online what other options are available? There are a lack of any face to face training providers particularly in remote areas.
- Will an accredited FSS training course be established in the NT that is accessible to all businesses and suitable for those with lower level literacy or English as a second language?
- Will there be FSS and food handler training provided in different languages to assist with this implementation?
- How often will food handler training be required, a once off or regular refresher training?
- Is FSS training still required if food business owners have no other food handlers they are responsible for? E.g. a small market stall owned and operated by 1 or 2 persons.

NT Health would like to thank FSANZ for their continued work on Proposal P1053. Any questions from FSANZ regarding this submission can be directed to [REDACTED]