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Hi,

Please find below feedback to the proposal P1053:

- The naming of Category 1-3 businesses is very confusing with the current Victorian classes 1-4 as the two do not align
- Agree with public feedback in relation to the lack of inclusion of allergen management. Allergen management and controls should be included in the definition of category on business
- Clarity that this standard also applies to home businesses undertaking the same activities
- Enforcement provisions for non-compliance must be clear
- Process definition – there is no mention of chilling (cook/chill)

Food Safety Supervisors

- The nomination and training of an FSS should include a current staff member that works on site (definition of FSS). We have many examples of a business nominating an FSS who has never been to the business.
- 3.2.2A-11 (b) difficult to prove an FSS is available. The definition of FSS as above would be more appropriate
- FSS training to have a national standard approach to ensure consistency in training. We recently ordered a non-compliant business to re-do FSS training. On the last day/ hour before the registration was due to be renewed a friend who had an FSS certificate certified he had trained him and his certificate was granted. (it is unlikely that the proprietor had the time to complete the training and this was purely a paperwork exercise)

Food Handler

- 3.2.2A-10. Training logs or certificates on site to demonstrate compliance would be required otherwise difficult to monitor compliance

Substantiating Food Safety Management

- 3.2.2A-12. The section will need explanatory notes. It is not clear whether the default of the business to keep records for the activities prescribed (4) until an officer has inspected and the premises complies or if an officer will need to direct for the records to be completed should there be a breach to the activities in (4).
- 3.2.2A-12 – should the records of activities be required examples and requirements should be provided
- 3.2.2A-12 – there is no mention of timeframes on how long a business is required to continue to complete records once compliance is achieved

Thanks

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