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Hi

I work at a Local Council as an EHO and I wish to provide the following comments concerning the proposed changes to the *Food Standards Code*.

Submission to proposal P1053

I do not support the inclusion of mandatory formal Food Handler Training (FHT) and the Food Safety Management Tool for the following reasons.

- The inclusion of mandatory Food Handler Training (FHT) is not required as the *Food Standards Code* already requires food handlers have appropriate skills and knowledge to handle food safely. There is no need to formalise this process and it would be difficult or impossible for EHOs to enforce and record. This is because there would be no way to know if every staff member had completed the training (especially in large premises that may have 100s of employees) and staff can change frequently. An EHO's resources are better used focusing on asking food handlers to display their skills and knowledge in the real world during the inspection, not finding out if they have a certificate.
- Mandatory FHT would be an un-necessary burden on small business. The proprietor of a small business is normally the Food Safety Supervisor and is generally present at the shop the majority of the time and able to supervise food handling.
- The introduction of the Food Safety Supervisor (FSS) did not see a dramatic increase in compliance with the *Food Standards Code*. Therefore FHT or mandatory Food Safety Management Tools are unlikely to increase compliance for non-compliant shops and would take up time during a food inspection which should be focused on real world results.
- While a voluntary Food Safety Management Tool may be useful for those shops that wish to participate, forcing this tool on shops would likely not result in increased compliance. This is because proprietors are already very busy and do not have time to spend 15 minutes each day filling in forms for matters they complete on a daily basis. The focus of the food inspection should be ensuring food is being handled in a safe way, not if a shop has completed a template. Additionally many larger shops that have the resources to implement such tools have already voluntarily implemented them, which would result in a double up.
- Based on the categories definition, the majority of food businesses (e.g. cafes, restaurants etc) would be category one. Most food businesses would not be category 2 as it would be unusual for restaurants/cafés etc to handle potentially hazardous food but not further process it. This means the proposed FHT and tools would need to be implemented by the majority of food businesses in NSW. This has the potential to unfairly impact small businesses as the Food Safety Supervisor of small food businesses is generally the proprietor and they are already normally present at the shop and supervising food handlers.

If you have any questions about the above please do not hesitate to contact me

Yours sincerely