

## National Allergy Strategy Submission - Proposal P1053 - Food safety management tools

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Submission from the National Allergy Strategy

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Submission authorised by the National Allergy Strategy Steering Committee

### Submission

#### Introductory comments

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In June 2019 and again in March 2020, the National Allergy Strategy made submissions relating to the *Review of Food Standards Code chapters 3 and 4 - Food Safety Management requirements*, and our submission included the following statement:

*There needs to be a national standardised approach to raise awareness that food safety management includes food allergen management. Omission of food allergen management from Australia's Foodborne Illness Reduction Strategy gives the message that food allergens and food allergy are not important and certainly not a priority.*

Therefore, the National Allergy Strategy is once again, extremely disappointed that Proposal P1053 addressing food safety management tools for food service and closely related retail sectors has not included any reference to food allergen management or justification for the exclusion of this information. To our knowledge, other key stakeholders have provided similar feedback as that provided by the National Allergy Strategy regarding the inclusion of food allergen management.

Engagement by the National Allergy Strategy with key stakeholder organisations in the development of food allergen management resources for food service has clearly indicated that food safety must include food allergen management.

#### Response to the proposed regulatory approach

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**The National Allergy Strategy does not support the proposed changes unless food allergen management is added.**

Should food allergen management be added, the National Allergy Strategy supports the following approach:

- The National Allergy Strategy agrees that Option 1 and Option 2 are not preferred and would not support these options.
- All reference to potentially hazardous food must also include reference to food allergens.

- The risk with respect to food allergens, is high for both Categories 1 and 2. There is still some risks for the customer with food allergy for Category 3 businesses.
- For Category 1 businesses:
  - The National Allergy Strategy supports the requirement for a food safety supervisor who has undertaken food safety training including food allergen management training.
  - We agree that Category 1 businesses should have documented processes for managing food allergens.
  - In addition, we believe that all staff should undertake food allergen management training, similar to the Responsible Service of Alcohol (RSA) requirement.
  - Food allergen management training undertaken by the food safety supervisor and all other staff should be undertaken at least every 2 years.
  - The National Allergy Strategy All about Allergens online training is nationally standardised, evidence-based, best-practice training developed in consultation with stakeholders and we believe this training should be the recommended food allergen management training.
  - All about Allergens is also available free of charge, therefore making it the accessible to all.
- For Category 2 businesses:
  - The National Allergy Strategy supports the requirement for a food safety supervisor who has undertaken food safety training including food allergen management training.
  - While Category 2 services are those who are not making food potentially hazardous food onsite, they are serving unpackaged food and therefore there is a risk to customers with food allergies.
  - Keeping evidence of critical process management should be required for Category 2 businesses in relation to food allergen management.
  - Category 2 businesses should also have a requirement for all staff to undertake food allergen management training and All about Allergens online training should be recommended.
  - Food allergen management training undertaken by the food safety supervisor and all other staff should be undertaken at least every 2 years.
  - In addition, Category 2 businesses should be required to have documented processes in terms of food allergen management.
- For Category 3 business:
  - We note that many service stations, cafes or stalls will sell food items that are not made on the premises and are not packaged.
  - In addition, some pre-packaged food is not labelled (e.g. bulk items often only have ingredient information on the outer packaging), and the allergen information may not be available on the individually packaged items.
  - Staff must understand their role in providing food allergen information to customers should they request it.
  - Therefore, we recommend that all staff in Category 3 business are required to undertake food allergen management training and All about Allergens online training should be recommended.
  - Food allergen management training undertaken by the food safety supervisor and all other staff should be undertaken at least every 2 years.
  - For Category 3, you have indicated that a targeted education campaign would be undertaken, however, have not specified what this campaign would encompass or who would undertake it. These staff still must understand their requirements to provide allergen information to customers on request if the product packaging does not have allergen information on it.

#### **Additional feedback:**

- An education campaign should be undertaken targeting all businesses, not just Category 3 businesses.
- Environmental Health Officers/Authorised Officers have a unique opportunity to inform and educate food businesses.

- Environmental Health Officers/Authorised Officers should undertake training to have a better understanding of food allergen management training.
- If audit/inspection tools used by EHOs/Authorised Officers do not include reference to food allergen management, businesses may:
  - Continue to be unaware that they should have appropriate practices in place to manage food allergens;
  - Continue to have poor food allergen practices in place despite knowing the requirement to have appropriate practices in place; and/or
  - Not consider food allergen management important because the EHO/Authorised Officer never asks, assesses or discusses food allergen management.
- Environmental Health Officers/Authorised Officers should have a nationally standardised audit tool which includes specific reference to food allergen management process.
  - There should be 2-3 specific references to food allergen management included in the audit tool. If the responses to these questions raise concerns, additional questioning regarding food allergen management should be undertaken and a standardised tool for this is recommended.

### **National Allergy Strategy recommendations**

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The National Allergy Strategy recommends the following:

1. All Category 1 and Category 2 businesses should have a food safety supervisor who has undertaken food safety training including food allergen management training.
2. All staff in Category 1 and Category 2 businesses should undertake food allergen management training.
3. All Category 1 businesses should have documented food safety processes including food allergen management.
4. All Category 2 businesses should have documented food allergen management processes.
5. All staff in Category 3 businesses should undertake food allergen management training.
6. All Category 3 businesses should have documented food allergen management processes.
7. An education campaign should be undertaken for all businesses not just Category 3.
8. Environmental Health Officers/Authorised Officers should undertake food allergen management training.
9. A nationally standardised audit/inspection tool should be developed which includes specific and appropriate reference to food allergen management.
10. The National Allergy Strategy's All about Allergens online training should be recommended as the food allergen management training undertaken.
11. Food allergen management training undertaken by food safety supervisors and all other staff should be undertaken at least every 2 years.