



Allergy & Anaphylaxis Australia

Food Standards Australia New Zealand

Food Standards Australia New Zealand (FSANZ)

submissions@foodstandards.gov.au

Submission from Allergy & Anaphylaxis Australia (A&AA)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

6 April 2022

Submission from Allergy & Anaphylaxis Australia:

Proposal P1053: Food safety management tools for the food service and closely related retail sectors

Background

Allergy & Anaphylaxis Australia (A&AA) is a member-based charity which strives to raise awareness of allergy in the community. It provides evidence-based information, resources and services to support children and adults living with allergic disease. A&AA has approximately 5000 members across all states and territories of Australia. The organisation also has over 60 000 followers on social media. We have a Medical Advisory Board which consists of several allergy specialists who are also members of Australia's peak medical body, ASCIA (the Australasian Society of Clinical Immunology and Allergy). A&AA works in close partnership with ASCIA to progress the National Allergy Strategy – www.nationalallergystrategy.org.au.

Summary

In principle, A&AA would support the FSANZ proposal for food safety management firstly if it included provisions relating to allergen management, and secondly if it also resulted in a uniform national approach to food safety management. The absence of an allergen management component is viewed by A&AA as a major deficiency, and the current range of existing and diverse food safety management systems currently in place in State legislation make uniformity across jurisdictions a major hurdle.

Allergen Management

A&AA again expresses its concern that allergen management has not been addressed, beyond an undertaking from FSANZ that:-

Other issues, including allergen management, new technologies and technical issues such as duplication of definitions, will be considered as part of the wider review of Chapter 3 of the Code.

Allergy & Anaphylaxis Australia – *Your trusted charity for allergy support*

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

Current situation for Food Safety Supervisors

A&AA also notes from the P1053 Call for Submission report with respect to Revised Food Acts in 2004, the following:-

In absence of an agreed national approach, Victoria, NSW, Queensland and the ACT introduce requirements to manage high risk in food service sector. All have requirements for food safety supervisors with competency-based training. Victoria and Queensland also have template-based food safety programs.

The position would seem to be that that with the exception of WA, Tas, SA and NT, Australian jurisdictions have not waited for FSANZ to address the issue food safety supervisors, have amended their Food Acts and would have little need to endorse the FSANZ approach.

Current situation for allergen management

With respect to allergen management, Victoria, Queensland, South Australia and Tasmania appear to have recognised the importance of including allergen management when understanding how to safely work with, and handle food in commercial settings.

DoFoodSafely is a free, non-accredited, online learning program provided by the Department of Health Victoria and proudly supported by Queensland Health, South Australia Health and Tasmania Health.

DoFoodSafely is designed to enable you to understand how to safely work with, and handle, food in commercial settings.

By reading through the information in the seven topics below, you will be ready to undertake the assessment quiz and gain your DoFoodSafely Certificate of Completion – a certificate that is well-respected by the food industry across Australia.

Topics I need to know: - Why food safety/personal hygiene/food handling/food contamination/food delivery, storage and display/cleaning and sanitising/food allergens

[See https://dofoodsafely.health.vic.gov.au/index.php/en/](https://dofoodsafely.health.vic.gov.au/index.php/en/)

NSW has amended the Food Act to introduce requirements relating to food safety supervisors and amended the Food Regulation to introduce food safety supervisor certificates for which the units of competency must include allergen management.

A&AA position

A&AA does not support the FSANZ proposal in the absence of an allergy management component.

It has taken A&AA many years to have regulators, legislators, retailers, manufacturers and others, especially food service, to understand that food allergy is as important as microbial/foreign body and chemical contamination with respect to safeguarding the health of vulnerable consumers. We now have the food industry accepting that food allergen management is part of food safety in its broad sense, and yet this proposal simply states that allergen management will be covered in the later review of Chapter 3.

A&AA urges FSANZ to prepare, as a matter of priority, a fresh proposal which focuses solely on food allergen management, as an addendum to the current proposal under P1053. This may require no more than amending the

competency standards required by food safety supervisors to include food allergy management. This would have the added benefit of enabling the current proposal under P1053 to align with those requirements already in place under legislation in several Australian States, and in New Zealand. Such a proposal seems unlikely to meet significant objections, as a number of jurisdictions have already recognised the necessity of including food allergy management.

Yours sincerely,

[Redacted signature block]

[Redacted contact information]