

Hi

Submission regarding Proposal P1053 Food Safety Management Tools.

The proposed Food safety management Tools take a risk-proportionate approach to categorising food businesses and proportionately requiring Food Safety Supervisors (FSS), Food handler Training (FHT) and Evidence recording.

All of these are already part of our processes are Mackay Regional Council through our Eat Safe program (Star Rating program) and current Qld legislation.

The introduction of the requirement for FSS to have completed training every 5 years is supported.

Currently we only require the completion of competency training once.

Our current Eat safe system rewards businesses who regularly train there staff in Food safety and keep good evidence records, granted 4 or 5 stars. 3 stars is considered legislation compliant, so adding FHT and Evidence as baseline for Category 1 food businesses is supported.

The reason for this submission though is in regard to the exemption of Non-for profit organisations and fund raising events.

In the Mackay Regional Council region we have a large amount of food produced by non-profit organisations. Prior to Covid -19 limitations we averaged 550 non-profit notifications annually.

Of these, approximately 400 relate to sausage sizzles or like. However approximately 150 relate to potentially hazardous food events including producing takeaway food (burger, chips, soups, curries), baked items (sausage rolls, pies, pasitizzi's), and catering for community functions.

Currently we require the non-profit organisations to notify Council that they are producing the food and produce safe and suitable food.

At Mackay Regional Council we offer free food safety training for non-profit organisations and community groups, both face to face and online.

The risk for these no-profit organisations are the same as for any food business that undertakes the handling and service of Potentially hazardous food.

The exemption of sausage sizzles is understandable, risk low and one off or irregular events. However the other 150 notifications a year cover the handling of PHF and usually are regular (at local market weekly, weekdays lunch takeaway etc).

Non-profit organisations are producing more and more PHF in takeaway form. We now have a number of non-profit organisations that produce takeaway food daily (only notify once a year to advise daily) The current Food Act in Qld exempts these organisations from licensing requirements based on the 12 days a year sale of meals. Meals is defined as requiring a person to sit to eat and use cutlery.

So Non-profit organisations are producing PHF that do not meet this definition.

My suggestion is to create a non-profit organisation category requiring the FHT and evidence to reduce the risk. Through our current training at MRC we educate at least 2 food handlers per non-profit organisation (often all volunteers) to ensure skills and knowledge and include the provision of templates to record evidence. At the moment this is all suggestive and encouraged. I am not sure why you have opted to exempt these organisations which are large producers of food in regional areas.

Please consider amending this exemption based on similar risks to other food businesses.