

Department of Health & Human Services

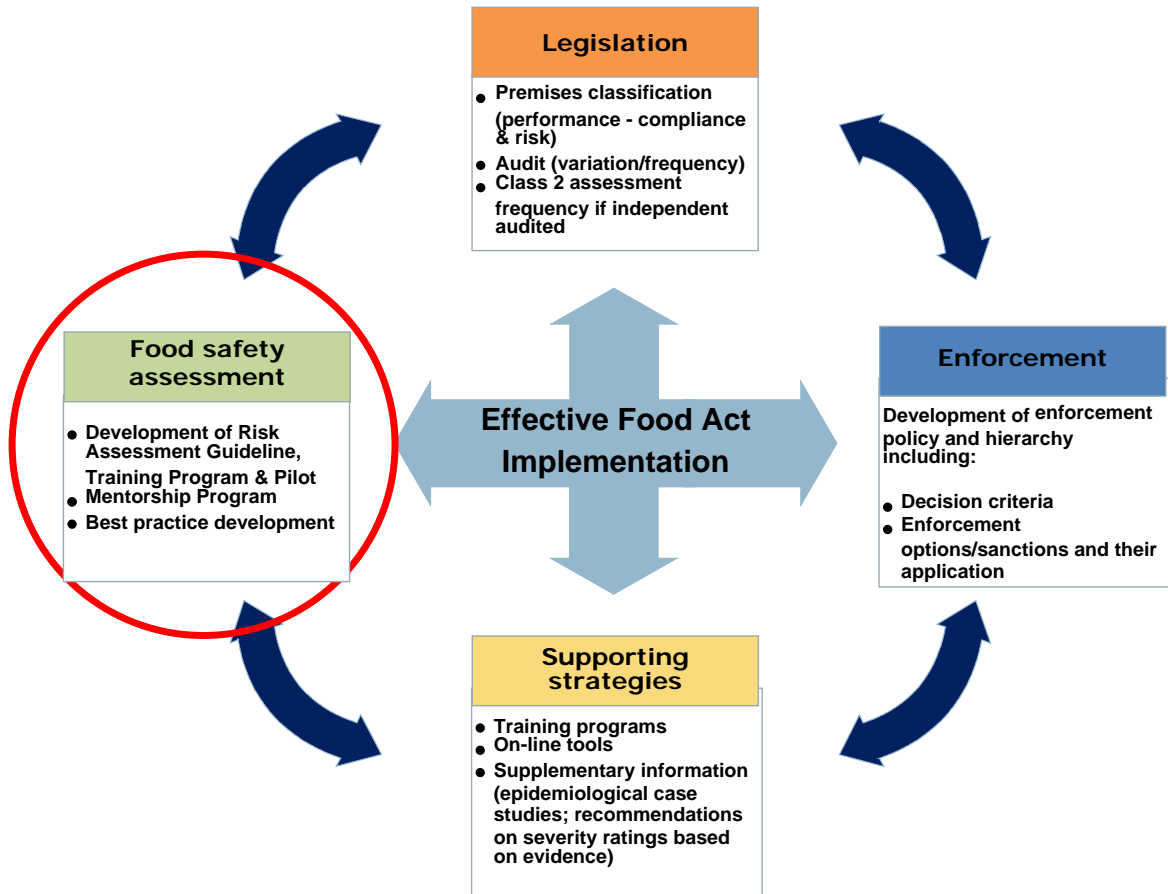
Development and Trial of the Draft Food Safety Assessment Guide

Project genesis

- **Victorian Competition and Efficiency Commission (VCEC) *Simplifying the Menu: Food Regulation in Victoria 2007***
 - 37 recommendations
- **Criticism of councils**
 - Inconsistency in compliance activities (interpretation, enforcement and priorities)
 - Recommendation 9.6
 - DHHS be responsible for developing inspection guidelines that would facilitate consistency among councils
- **Government response to recommendation 9.6 (in part)**
 - Once the necessary amendments to the *Food Act* are made, the Department will develop inspection guidelines to ensure consistency across the State

DHHS Food Regulation Management Framework

Food Regulation Management Framework



Aims of the Framework:

- Orientation to securing food safety outcomes
- Develop greater consistency in councils' compliance assessment
- Proportionate regulatory action in cases of non-compliance
- Development of a range of supporting resources

Scope of the Assessment Guideline

- Fundamental resource for health (Ottawa Charter 1986)
- Various aspects to ‘food’ with a range of associated issues:
 - Food security – availability, access & sustainability
 - Nutrition – wellbeing & healthy diet
 - Consumer information – labelling, declarations and claims
 - Health protection – prevention of injury to consumers

What informed the development of the draft 2014 Assessment Guide?

Regulatory Policy Context

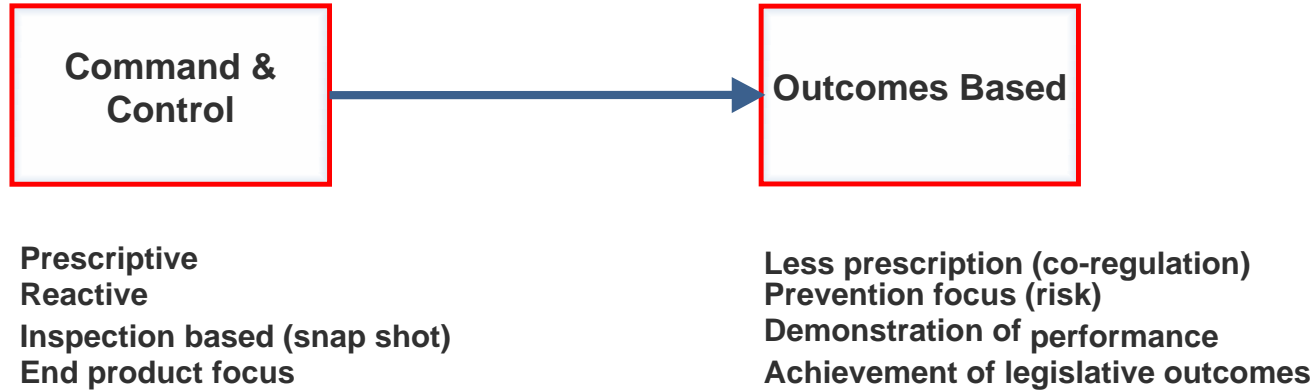
Council of Australian Governments 1995

- Endorsed regulatory practice principles for decisions of Ministerial Councils/inter-governmental standard setting bodies:
 - regulatory measures are the minimum required to achieve the predetermined desirable outcome
 - scientifically robust assessment processes
 - an analysis of risk
 - performance and outcome based rather than prescriptive

VCEC 2007 (Simplifying the menu)

- Regulatory policy guidelines (Rec 8.2):
 - risk the minimum necessary to achieve the desired objective (outcome)
 - based (reduce regulatory burden & improve resource allocation)
 - efficiently administered (min. administrative and compliance costs)
 - nationally consistent
 - evidence based
 - mindful of international food regulations and market access implications

Regulatory Policy Context - Change in regulatory approach



- reinforces industry responsibility for safe food
- focuses regulators and businesses on prevention as a priority
- consistent with the Food Safety Standards
- draws on science and evidence to enable clear identification and mitigation of food safety risks
- provides businesses with flexibility and the opportunity for innovation
- enables authorised officers to make decisions:
 - appropriate to the food safety risks observed during inspections and assessments
 - more likely to result in improved outcomes.

Regulatory Policy Context – National Agreement

Food Regulatory Agreement (2000) – agreement/adoption of:

- Model Food Act provisions (e.g. objects of the legislation)
- Food Standards Code (definitions drawn from Codex)
- Australia and New Zealand Food Regulation Ministerial Council
- FRSC/ISC

Australian food safety risk framework (Based on priority microbiological classification of food businesses):

Five major risk factors:

- food type and intended customer use (risk category of food)
- activity of the business (e.g. handling of RTE food)
- method of processing (pathogen reduction step)
- customer base (YOPI - at risk populations)

The food unsafety evidence

Notifications by selected causative microorganism 2013-Current in Victoria

Food Borne Illness	2013	2014	2015	(March) 2016
Campylobacter	5891	7236	7638	1746
Listeria	24	21	22	5
Salmonella	2942	3690	3472	1250
Shigella	101	461	443	116

The food unsafety evidence

Outbreaks by premises type 2010-14 (Victoria)		
Premises type	Number	
Aged Care	54	31%
Bakery	4	
Camp	1	
Commercial caterer	13	7%
Community groups	2	
Grocery	1	
Hospitals	7	
Institutions	2	
Private caterer	1	
Private residents	38	20%
Restaurants	55	29%
Schools	2	
Take Away	6	
Unknown	4	
Total	190	

Summary

“The traditional regulatory inspection seeks only to obtain correction of food safety concerns that already exist rather than to prevent future concerns from occurring - a reactive rather than proactive approach. There is a need to refocus on the assessment of the controls put in place in the food business operations to address food-borne disease risk factors that could put the food at risk”

(FAO 2008 p. 8)

Conclusions

- Food safety assessment is about:
 - compliance being defined as the achievement of safe and suitable food (outcome)
 - a focus on prevention of unsafe/unsuitable food & promotion of safe practices
 - using science principles/evidence (don't reach for the 'rule book')
 - risk approach means prioritisation and assessed performance
 - risk communication & reinforcement of priorities to business (food safety culture)
 - effective use of resources (EHOs)
 - a process that is ongoing

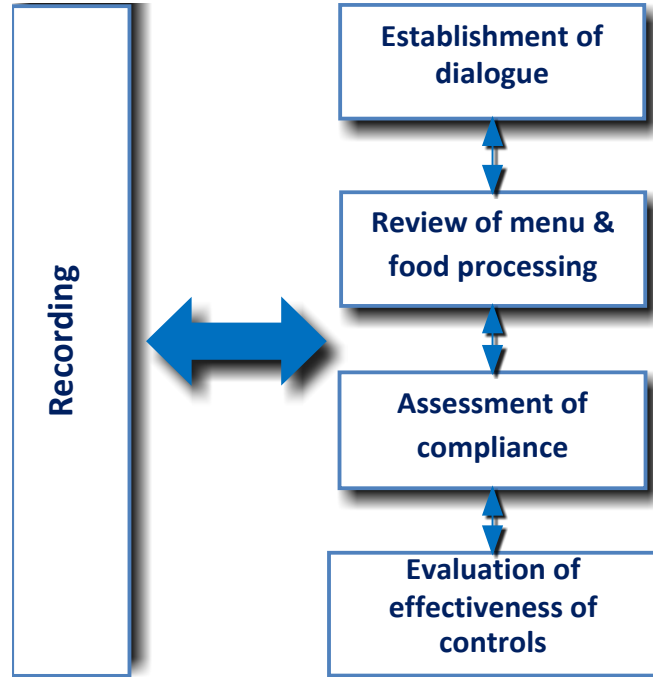
Purpose of the Compliance Assessment Guide

- to assist officers to focus on regulatory outcomes by conducting food safety assessment using a risk-based approach
- to improve the consistency in conducting food safety inspections and assessments and prioritising of inspection programs based on risk

Structure of the Guide

- a five-step compliance assessment method designed to identify food and food processes and evaluate effectiveness of hazard management controls

Food safety compliance assessment process



Focus is on establishing an assessment method (prevention, prioritisation & performance assessment):

- food and food processes
- utilising HACCP principles to identify CCPs
- assessing the effectiveness of the business' food safety management controls (performance)

Process approach to compliance assessment

Process 1: Food Preparation with no cook step	Process 2: Cook and serve process	Process 3: Complex food preparation
<p>All foods in this category lack a kill (cook) step which include:</p> <ul style="list-style-type: none"> • Raw ready to eat foods like oysters, salads & sashimi. <p>Foods cooked at the processing level but that undergo no further cooking at the retail level before being consumed which include:</p> <ul style="list-style-type: none"> • Processed ready to eat foods like smallgoods, cheese, yoghurt; <p>Foods that are received and sold raw which include:</p> <ul style="list-style-type: none"> • Raw meat products like mince, steak etc 	<p>In this food preparation process, food passes through the danger zone only once in the food business before it is served or sold to the consumer.</p> <p>Food is usually cooked and hot held, but can also be cooked and served immediately.</p> <ul style="list-style-type: none"> • Most take away foods fit under this category. 	<p>Foods prepared in large volumes or in advance for next day service usually follow an extended process flow.</p> <p>These foods will pass through the temperature danger zone more than one time, therefore the potential for the growth of spore-forming or toxigenic bacteria is greater in this process.</p> <p>An examples of these foods include:</p> <ul style="list-style-type: none"> • Roast meats • Kebab meats
<p>Critical Control Points:</p> <ul style="list-style-type: none"> ➤ Receive ➤ Store ➤ Prepare ➤ Hold ➤ Serve 	<p>Critical Control Points:</p> <ul style="list-style-type: none"> ➤ Receive ➤ Store ➤ Prepare ➤ Cook ➤ Hold ➤ Serve 	<p>Critical Control Points:</p> <ul style="list-style-type: none"> ➤ Receive ➤ Store ➤ Prepare ➤ Cook ➤ Cool ➤ Reheat ➤ Hot hold ➤ Serve

2016 Trial of the Guide & Supporting Materials

Purpose: to test, evaluate and refine the Guide and Supporting Resources (Training Program On Line Tools Resource and Draft Enforcement Framework) through a trial council group

Trial Council Group:

- Mt Alexander
- Kingston
- Greater Bendigo
- Moorabool
- Surf Coast
- Melbourne
- Yarra Ranges

Trial duration: April to October 2016

Trial of the Guide & Supporting Materials Timetable

March		Criteria for participation and selection of trial councils
April	19th & 21st	Briefing and Training Sessions (MAV Melbourne & Moorabool)
	25th	Commencement of Trial
May	9-13th	First field visit (Support)
June	13-15th	Second field visit (Evaluation) Mid-trial Report
July	11-15th	Third field visit (Evaluation)
September		Draft Evaluation Report Draft State-wide Rollout Strategy (2017)
October		DHHS Debrief
November	30th	Final Report & Guide/Training Program

