

**SHIRE OF CAMPASPE**

**FOOD SAFETY MANAGEMENT STRATEGY**

**JUNE 2005**

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## **1. INTRODUCTION**

In the past the *Food Act 1984 (Food Act)* focused on prescriptive structural and cleanliness requirements which were found to be ineffective and did not adequately address food safety and handling issues. The *Food Act* was significantly amended in 1997 to become risk based which resulted in a fundamental change in the roles and responsibilities of food business proprietors, enforcement agencies, auditors and training providers. The *Food Act* is also the means of applying national food safety standards (Food Standards Australia New Zealand (FSANZ) Food Safety Standards 3.2.2 & 3.2.3) as law.

FSANZ Food Standards Code are prescriptive standards covering the composition of food, labelling of packaged food and outlines what additives, preservatives etc are permitted in all foods sold in Australia.

The Department of Human Services Food Safety Unit is the Victorian lead agency for implementing food safety legislation and regulatory reforms. Their role is to:

- facilitate the key provisions of the *Food Act 1984*,
- register food safety programs and auditors,
- facilitate food recalls and investigate food borne illness,
- monitor food safety trends, and
- develop risk management tools and provide input into national policies

The Shire of Campaspe has a number of large national food manufacturers and is a desirable holiday destination for tourists. The impact of poor food safety practices leading to a

food poisoning outbreak on either industry will have significant short to medium term effect for the Shire.

## **2. PURPOSE**

The Shire of Campaspe Food Safety Management Strategy summarises the duties and powers of Council and its authorised officers in the enforcement of the key elements of the *Food Act* and outlines Council's current compliance with the *Food Act*. This strategy also describes further opportunities for improvement, as suggested by the Auditor General's October 2002 Report "Management of Food Safety in Victoria", so that the Shire of Campaspe meets all of its statutory duties and is a leader in food safety management.

The purpose of the Shire of Campaspe's Food Safety Management Strategy is to:

- Ensure the Council meets all of its statutory functions as outlined in the *Food Act 1984*;
- Adopt nationally developed policies and standards to ensure a consistent approach in the management of food safety;
- Outline further opportunities for improvement so that the Environmental Health unit is a leader in food safety management;
- Ensure that the service delivered meets the needs and expectations of food businesses and community as a whole in regards to the sale of safe food; and
- Outline Council's commitment to protect and maintain the health and well being of the community by ensuring any food that is sold within the municipality is safe.

### **3. SCOPE**

This strategy applies to any food business including retailers and food manufacturers, schools, hospitals, child care centres, aged care accommodation, temporary food events and any service area of the Council involved in food service delivery (such as meals on wheels).

### **4. LEGISLATIVE FRAMEWORK**

- Food Act 1984
- Food Standards Australia New Zealand (FSANZ) Food Safety Standards (FSS) 3.1.1, 3.2.2 and 3.2.3
- Victoria's Safe Food System – An Auditor's Handbook 2001, Public Health Division Victorian Government Department of Human Services 2001
- Australian Institute of Environmental Health (AIEH) Food Safety Standard of Practice, September 2003
- AIEH Australian Food Safety Assessment (AFSA) audit tool
- Australian Standard 4674 – 2004 Design, Construction and Fitout of Food Premises.
- Auditor General's October 2002 Report "Management of Food Safety in Victoria"

### **5. DEFINITIONS**

Refer to the *Food Act 1984* for the following definitions:

- |                 |                          |
|-----------------|--------------------------|
| • Food          | • Proprietor             |
| • Food Business | • Unsafe Food            |
| • Food Premises | • Unsuitable Food        |
| • Premises      | • Food Safety Program    |
| • Sell          | • Food Safety Supervisor |

- **Non-Compliance** – a food handling practice that is found not to comply with a specified requirement documented in the Food Safety Program (FSP) or FSANZ Food Safety Standards (FSS) 3.2.2 or 3.2.3 or the *Food Act*.
- **Minor Non-Compliance** – low risk situation where there is a non-compliance with the requirements documented in the FSP, FSS 3.2.2 or 3.2.3 or the *Food Act*, but the potential impact of the non-compliance is not likely to be a serious or imminent risk to public health.
- **Major Non-Compliance** – a potentially high risk situation where there is a non-compliance with the requirements documented in the FSP, FSS 3.2.2 or 3.2.3 or the *Food Act*, and the potential impact of the non-compliance is likely to compromise food safety if no remedial action is taken to correct the non-compliance within 7 days. NOTE: where more than one related minor non-compliance is noted which collectively is likely to compromise food safety, then the non-compliance is deemed to be classified as major.
- **Critical Non-Compliance** – a high risk situation where there is a non-compliance with the requirements documented in the FSP, FSS 3.2.2 or 3.2.3 or the *Food Act*, and the impact of the non-compliance is a serious or imminent risk to public health, ie the food, practice or situation has compromised the consumer's health or if allowed to continue will compromise the consumer's health.

## **6. COUNCIL'S ROLES AND RESPONSIBILITIES UNDER THE FOOD ACT 1984**

The primary objective of the *Food Act 1984* is to minimise the risks of food borne illness from poorly prepared and unsafe food. Councils, through their authorised Environmental Health Officers (EHO's) are responsible for administering and implementing the legislation through registration and monitoring the preparation and sale of food through inspections and food sampling.

The *Food Act* outlines the core functions of Council as:

- Registration of all businesses that sell food,
- Assessment of Food Safety Programs (FSPs),
- Managing the third party audit system to ensure businesses are audited as specified and to investigate/follow up non-compliances detected by auditors,
- Inspection of food businesses prior to registration, renewal or transfer of registration,
- Assessment of compliance with Food Safety Standards 3.2.2 and 3.2.3,
- Monitoring food preparation, hygiene and safety standards, and taking preventative or remedial action in the event of non-compliance with the legislation or standards,
- Procuring food samples for analysis and
- Investigating complaints against food businesses.

The Shire of Campaspe's Environmental Health Officers are situated within Environmental Services Unit and is staffed by two full-time and one part-time Environmental Health Officers, an Administrative Assistant and Manager.

The core functions of the *Food Act* and how the Shire of Campaspe administers them are discussed in detail below.

### **6.1 REGISTRATION**

The *Food Act* clearly outlines the duties and function of Council with respect to the registration of food businesses, the procedure for registering food businesses and what is required for registration. The Shire of Campaspe can exempt certain businesses from the requirement to be registered, however any business selling food must notify the registration authority as outlined in Food Standards Australia New Zealand Food Safety Standard 3.1.1.

To date the Shire of Campaspe registers all food businesses except newsagents and chemists that sell small quantities of prepackaged food. Some businesses such as school canteens are exempt from paying a registration fee. Major events such as the Southern 80, Jazz Food and Wine Festival and the like have not been formally registered which was identified by the Auditor General's report as not in compliance with the *Food Act*. All temporary food premises must be registered and submit an appropriate Food Safety Program with their registration. Any commercial food businesses that are operating a temporary food premises should also have a nominated Food Safety Supervisor.

As of February 2005, the Shire of Campaspe registered 330 *Food Act* premises distributed throughout the Shire as follows:

Echuca	177	Rochester	27	Stanhope	5	Other	34
Kyabram	58	Rushworth	18	Tongala	11	townships	

The *Food Act* permits local government to determine the registration period. The Shire of Campaspe Food Act registration period expires annually on June 30, to coincide with the financial year. The registration period for most other councils expires on December 31.

The Shire of Campaspe records all information of Food Act registrations on Councils database. Hardcopies are also retained in filing cabinets, together with inspection reports, copies of food safety programs, solicitor requests, complaints and sampling results. From this, various reports/information are obtained and presented in other formats.

## **6.2 FOOD SAFETY PROGRAM (FSP) ASSESSMENT**

In 1997, risk based Food Safety Programs were introduced via an amendment to the Victorian Food Act as an alternative to prescriptive based legislation, which was found to be too restrictive and not adequately controlling food safety risks.

The *Food Act* describes two types of food safety programs – state government approved food safety program templates (of which there are approximately 29 templates) and independent food safety programs as outlined in section 19D of the Food Act.

All food businesses, except those selling only low risk pre-packaged food that do not require any temperature control, were required to submit a food safety program for the registration period commencing July 1, 2002.

The *Food Act* outlines how Councils are to manage both types of food safety program submissions and resolve any non-compliance.

### **Template Food Safety Programs**

Environmental Health Officers are required to assess any food business that has a FSP template to ensure that the FSP template is appropriate for the business and is being implemented and complied with. The *Food Act* does not outline how an EHO is to be satisfied that the FSP is appropriate for the premises. The Shire of Campaspe has developed a detailed audit tool and procedure which is used to ensure all food businesses were assessed consistently to ensure compliance with the Food Act.

The *Food Act* clearly outlines the action to take if, after an inspection, the EHO is of the opinion that the FSP has not been implemented or complied with. The *Food Act* does not define or categorise non-compliances under this section. The Australian Institute of Environmental Health developed a Food Safety Standard of Practice which explains different types of non-compliances and recommended remedial action. Options for resolving non-compliances also include seizure of food or equipment and prosecution.

As of March 2004, the Shire of Campaspe has received the following types of template Food Safety Programs:

AHA	8	Foodsmart	69	FSP type not known	36
DHS	163	Other Templates	10	FSP not required	13

## Independent Food Safety Programs

Council's role in managing independent FSP's is different to assessing template FSP submissions.

Once submitted, a desktop assessment of each independent FSP is conducted to ensure the FSP satisfies the requirements of section 19D, which outlines what should be included in a FSP. This process is quite detailed and lengthy. The Shire of Campaspe has developed a detailed audit tool to ensure independent FSP meet the *Food Act* requirements.

The *Food Act* prohibits an EHO from conducting or assisting in an audit of the premises that uses an independent FSP. This must be performed by a registered third party auditor and paid for by the proprietor of the business. The *Food Act* specifies when audits are to commence and how frequent they are to be conducted. The proprietor must forward audit reports to the Council within 14 days of receipt. The EHO ensures that a business is complying with the audit frequencies and that reports are forwarded to Councils.

The EHO reviews the third party audit reports to ensure that:

- The auditor has acted as authorised,
- The auditor has correctly conducted and completed the audit reports,
- All reported non-compliances are appropriately categorised (ie minor, major and critical or serious),
- Rectification works and timeframes for completion are adequate and achievable, and
- To investigate all reported incidences of critical non-compliances and take appropriate action.

The *Food Act* outlines that a failure to have the business audited as scheduled or requested, or failure to provide a copy of the audit report is grounds for the refusal of registration or suspension or revocation of registration of the business.

An auditor cannot take any further action such as seizure, suspension or closure of premises. These powers are only available to the EHO's or authorised officers of The Department of Human Services.

Council must still conduct an annual inspection of third party audited premises for registration purposes.

As of February 2005, the Shire of Campaspe has 16 class 1 premises (hospitals, aged care accommodation, child care centres) and 15 class 2 premises (mainly manufacturing premises and large supermarket chains) that use an independent FSP.

## **6.3 FOOD PREMISES INSPECTIONS**

Inspections are an important method of monitoring the sale of safe food and to ensure food businesses adopt good food handling and hygiene practices. Inspections are also a mechanism to educate food business proprietors and their staff on the importance of FSP and how the FSANZ Food Safety Standards apply to their business. EHOs assist and encourage food businesses compliance with their FSP and FSANZ Food Safety Standards 3.2.2 & 3.2.3.

Inspections consider items such as the structural condition of the premises, food handling and hygiene practices and the skills and knowledge of food handlers.

Council must conduct at least an annual inspection prior to registration, renewal or transfer of registration to ensure each business complies with their food safety program and compare the physical condition and food processes to the FSANZ Food Safety Standards (s. 39(1)). The Shire of Campaspe endeavours to conduct 2 inspections a year per premises.

The FSANZ Food Safety Standards 3.2.2 and 3.2.3 are national outcome based guidelines to ensure the safe handling and storage of food. The Australian Institute of Environmental Health (AIEH) Food Safety Standard of Practice assists Environmental Health Officers apply their knowledge and skills in a professionally responsible, accountable and consistent manner to improve food safety. The AIEH developed the Australian Food Safety Assessment (AFSA) audit tool to assist EHO's in assessing a food businesses compliance with FSANZ Food Safety Standards 3.2.2 and 3.2.3. A food business Food Safety Program is a mechanism that the proprietor can use to provide evidence to demonstrate compliance with the FSANZ Food Safety Standards 3.2.2 and 3.2.3.

The AIEH Australian Food Safety Assessment audit tool can also be used to determine an inspection frequency based on the FSANZ model. This is important for determining EHO resources and potentially a fee structure, whereby food businesses that need more inspections pay for them.

Adoption of the nationally endorsed AIEH Food Safety Standard of Practice and AFSA audit tool is a strategic risk based approach in conducting inspections which

- Ensures consistent assessment of all food premises,
- Determines compliance with FSANZ Food Safety Standards 3.2.2 and 3.2.3,
- Ensures the food safety program is implemented and complied with and
- Determines an inspection frequency of the food premises.

Any items that do not comply with the FSANZ Food Safety Standards are dealt with under the enforcement provisions of the *Food Act*. The *Food Act* has a general offence provision for premises, food vending machines and equipment and food handlers. The most common method for actioning non-compliances with the FSANZ Food Safety Standards is to issue a formal notice. A failure to comply with a formal notice can lead to further action such as prosecution, seizure of food or equipment or closure. Once the non-compliance has been remedied, the notice must be revoked. A person may appeal to the Magistrate if they are not happy with the notice that was issued.

Environmental Health Officers encourage and assist food businesses to comply with the requirements of the *Food Act* and more formal action is undertaken as the last resort. Environmental Health Officers must act when public health and safety is at risk. Food businesses can prevent formal action by complying with the requirements of the *Food Act* and FSANZ Food Standards Code.

#### **6.4 FOOD SAMPLING**

Food sampling undertaken by council is a crucial method of monitoring potential public health risks due to poor food handling and preparation. Without an adequate sampling program, the monitoring of food safety relies on customer complaints and outbreaks of food borne illnesses.

The main reason that food samples fail is due to poor food handling/hygiene practices, including a failure to store or display food at the correct temperatures. An increasing high food sample failure rate may indicate declining food safety, but it may also indicate a more strategic approach to food sampling, focusing on foods that are considered to be high risk and consequently having a higher failure rate.

The *Food Act* is very clear about how the minimum number of samples that Councils are required to submit for analysis each financial year (s.32(1)). For the Shire of Campaspe this equates to approximately 110 samples per year, a minimum of 10 food samples collected a month will meet our required *Food Act* quota. The *Food Act* is also very clear about the procurement of food samples and the procedure to be followed (s. 22 & 23). A failure to comply with the food sampling procedures outlined in the *Food Act* has resulted in non-compliant food samples being dismissed from the Magistrate's Court.

All food sampling results from the Analyst are to be presented at the next ordinary meeting of the Council (s. 32(2)).

#### **6.5 COMPLAINT INVESTIGATION**

Complaints are another mechanism of assessing food business compliance. It is important feedback from the public and indicates the public's expectations regarding food safety. Food complaints fall into four broad categories –

1. foreign objects found in food or food not meeting the consumers expectations
2. poor food premises conditions
3. poor food handling practices, or
4. alleged cases of food poisoning.

The *Food Act* makes it an offence to sell unsafe or unsuitable food. Any food business found to sell unsafe or unsuitable food or handle food in an unsafe or unsuitable manner can be prosecuted.

### **7. FOOD SAFETY MANAGEMENT STRATEGY**

The Food Safety Management Strategy examines each of Council's core functions mentioned and outlines action required or opportunities for further improvement to ensure we meet our statutory duties, adopt national policies and procedures to provide best practice in service delivery and be responsive to emerging issues.

The Food Safety Management Strategy is to be reviewed every three years as part of Environmental Services Unit planning.

**Food Safety Management Strategy - Registration**

<b>Food Act Task – Registration</b>	<b>Action Required/Further Opportunities for Improvement</b>	<b>Timeframe</b>
Ensure all premises selling food are registered, including Temporary Food Premises (TFP) which are currently not formally registered. (s.35)	<ul style="list-style-type: none"> <li>• Prepare Temporary Food Premises guidelines, develop TFP application form, determine appropriate fee and register from new registration period (from July 2005).</li> <li>• Prepare information brochure for proprietors / community groups.</li> <li>• Consider conducting information sessions for interested organisations.</li> <li>• Post information on council's internet site.</li> </ul>	Completed  Completed As needed Completed
Exemption from the requirement of a food business to be Registered under the Food Act. (s.38(3) & (4))	<ul style="list-style-type: none"> <li>• Prepare a report to Council outlining likely businesses that can be exempt from registration or payment of fees.</li> </ul>	October 2005
Fees for registration, renewal of registration or transfer of registration. (s.41(1) & (2))	<ul style="list-style-type: none"> <li>• Prepare a report to Council recommending fee structure for food premises as part of Council's annual budget planning.</li> <li>• Recommend adoption of fee structure for temporary food premises and a late registration renewal fee.</li> </ul>	Annually – March October 2005
Process Application for Registration, Renewal of Registration or Transfer of Registration.	<ul style="list-style-type: none"> <li>• Review application forms and procedures.</li> <li>• Review date application forms are sent and return due date.</li> <li>• Introduce procedure for late payment and return of registration renewal forms.</li> <li>• Review procedures and place on Council's IMS system.</li> <li>• Review format and procedure of Registration Certificates.</li> <li>• Ensure food business details are updated and current on Council's information system and VicFIN.</li> <li>• Pursue food businesses that haven't renewed, or completed transfer of registration within timeframes.</li> </ul>	Annually – March Annually – April October 2005 Ongoing Annually – July  Ongoing
Non-Compliance of Food Act requirements for Registration and Suspension or Revocation of Registration. (s.39A))	<ul style="list-style-type: none"> <li>• Develop procedures for non-compliance or if any grounds for refusal of registration / renewal of registration / transfer of registration exist and place on Council's IMS system.</li> <li>• The refusal of an officer to grant, renew or transfer the registration of any food premises is of no effect until it is ratified by the council. (s.58A(2)). Prepare report when needed.</li> </ul>	August 2006  As needed

**Food Safety Management Strategy - Registration**

<b>Food Act Task – Registration</b>	<b>Action Required/Further Opportunities for Improvement</b>	<b>Timeframe</b>
New Food Premises	<ul style="list-style-type: none"> <li>• Adopt Australian Standard 4674 – 2004 Design, Construction and Fitout of Food Premises and FSANZ Food Safety Standards 3.2.2 and 3.2.3 for new food premises</li> </ul>	Adopted
Transfers	<ul style="list-style-type: none"> <li>• Prepare information brochure to ensure better returns of transfer forms and fees.</li> <li>• Review procedures (fee collection, form return, FSP declaration, obtaining proprietor consent to disclose information about premises) and place on Council's IMS system.</li> <li>• Inform solicitors of transfer process.</li> </ul>	Completed  Ongoing  Completed

**Food Safety Management Strategy – Food Safety Programs**

<b>Food Act Task – Template Food Safety Program</b>	<b>Action Required/Further Opportunities for Improvement</b>	<b>Timeframe</b>
FSP required for registration, renewal or transfer of registration. (s.19C(3))	<ul style="list-style-type: none"> <li>• Mandatory requirement for registration.</li> </ul>	Ongoing
FSP Submission	<ul style="list-style-type: none"> <li>• Prepare report outlining businesses that do not require a FSP and businesses that have not submitted a FSP.</li> <li>• Review mechanism to ensure FSP's are submitted.</li> <li>• Review storage location of FSP.</li> </ul>	Annually - August Ongoing October 2008
Desktop assessment to ensure appropriate template used and completed as per template FSP instructions.	<ul style="list-style-type: none"> <li>• Prepare report outlining current status of businesses that have not had a desktop assessment.</li> <li>• Review current procedures and reports and place on Council's IMS system.</li> </ul>	Annually - August Ongoing
Onsite assessment to ensure FSP is being implemented and complied with. (s. 19HA)	<ul style="list-style-type: none"> <li>• Prepare report outlining current status of businesses that have not had an onsite assessment.</li> <li>• Conduct onsite assessment.</li> <li>• Review current procedures and reports and place on council's IMS system..</li> </ul>	Annually - August Ongoing Ongoing
Non-Compliance with a requirement in the FSP (s. 19F) or FSP has not been implemented or complied with as evident from inspection (s. 19HB)	<ul style="list-style-type: none"> <li>• Establish mechanism for follow up and resolution of non-compliances.</li> <li>• Identify barriers to full compliance of FSP implementation.</li> </ul>	August 2006 August 2006
Provide education to food business proprietors and Food Safety Supervisors.	<ul style="list-style-type: none"> <li>• Review information brochure outlining approved types of FSP, contact details, FSS requirements and where to go for courses.</li> <li>• Invite food business proprietors to a regular forum to discuss problems with FSP implementation and compliance.</li> </ul>	Completed  Annually – September

**Food Safety Management Strategy – Food Safety Programs**

<b>Food Act Task – Independent Food Safety Program</b>	<b>Action Required/Further Opportunities for Improvement</b>	<b>Timeframe</b>
FSP required for registration, renewal or transfer of registration. (s.19C(3))	<ul style="list-style-type: none"> <li>Mandatory requirement for registration.</li> </ul>	Ongoing
FSP Submission	<ul style="list-style-type: none"> <li>Prepare spreadsheet or utilise Fujitsu for Independent FSP submissions.</li> <li>Review storage location of FSP (most are large detailed documents, some are provided on CD disk.)</li> </ul>	Completed October 2008
Desktop assessment to ensure compliance with section 19D.	<ul style="list-style-type: none"> <li>Review desktop assessment tool and procedures and place on council's IMS system.</li> </ul>	As needed
Audit Reports	<ul style="list-style-type: none"> <li>Review information system capabilities for monitoring audit reports submitted and follow up of non – compliance.</li> </ul>	Completed
Non-Compliance	<ul style="list-style-type: none"> <li>Review procedures regarding the actioning of auditor reports of non-compliance and place on council's IMS system.</li> </ul>	September 2006

**Food Safety Management Strategy – Inspection**

<b>Food Act Task – Inspection</b>	<b>Action Required/Further Opportunities for Improvement</b>	<b>Timeframe</b>
Develop a risk based strategic approach to the conduct of annual inspections and the assessment of food business compliance against consistent criteria in consideration with the food business history.	<ul style="list-style-type: none"> <li>• Adopt and follow AIEH Food Safety Standard of Practice and assess a business compliance with the FSANZ Food Safety Standards 3.2.2 &amp; 3.2.3, which ensures a comprehensive, nationally consistent and systematic assessment of compliance.</li> <li>• Undertake training in the AIEH Food Safety Standards of Practice and AFSA audit tool.</li> <li>• Prepare a report of food businesses that haven't been inspected in last 2 years and prioritise for future inspections.</li> <li>• Prepare list of food businesses with food vending machines (no register exists and no inspections are conducted) s.19(3).</li> <li>• Examine options for reducing level of incomplete annual inspections and develop a strategy to ensure annual inspections are covered in future inspection programs.</li> <li>• Reassess the adequacy of EHO resources to ensure annual inspections of all food businesses occur by determining an inspection frequency and adopting an additional inspection fee for non-compliance.</li> </ul>	<p>August 2005</p> <p>When available Completed</p> <p>August 2008</p> <p>September 2007</p> <p>As needed</p>
Councils must conduct an annual (registration) inspection of food businesses to ensure each business complies with their FSP and compare the physical condition and food processes to the food safety standards (s.39(1)).	<ul style="list-style-type: none"> <li>• Ensure proprietor signs audit tool to acknowledge acceptance of non-compliant issues raised during inspection.</li> <li>• Identify CALD businesses that may require further resources from registration forms.</li> <li>• Review method of providing detailed feedback to proprietor as a result of inspection (especially CALD)</li> </ul>	<p>August 2005</p> <p>March 2006</p> <p>March 2006</p>

**Food Safety Management Strategy – Inspection**

<b>Food Act Task – Inspection</b>	<b>Action Required/Further Opportunities for Improvement</b>	<b>Timeframe</b>
Non-Compliance (s. 19 & 19B)	<ul style="list-style-type: none"> <li>Develop a procedure for dealing with non-compliance to prevent multiple orders to the same food business for the same non-compliant issues and inefficient use of EHO time and place on council's IMS system.</li> <li>All non-compliances results in the proprietor being issued with a letter detailing a schedule of works to be performed within a specified timeframe (s. 19(1) (3) &amp; (4) and s. 19B(1)).</li> <li>Critical non-compliance results may also result in seizure of food, formal food samples or swabs, prosecution or closure.</li> </ul>	<p>March 2006</p> <p>Commenced - Ongoing</p> <p>As needed</p>
Method of Service of Formal Notices (s. 19(5) & 19B(2)).	<ul style="list-style-type: none"> <li>Develop a procedure for the method of service of formal notices.</li> <li>Review content of formal notices.</li> </ul>	<p>March 2006</p> <p>March 2006</p>
Revocation of Formal Notices (s. 19(6) & 19B(3)).	<ul style="list-style-type: none"> <li>Ensure compliance with formal notices are revoked in the same manner as they were served (ie. a written letter detailing which items have been complied with and thereby revoked).</li> </ul>	<p>March 2006</p>
Recording inspection results/action on council's database.	<ul style="list-style-type: none"> <li>Review information system reporting (fujitsu) and commence inputting inspection results.</li> <li>Database should flag reports of forthcoming follow up inspections. Ensure inspections are clearly identified, ie annual inspection, follow up inspection, routine inspection, complaint investigation</li> <li>Analyse data from inspection results to identify food safety trends or issues.</li> </ul>	<p>August 2005</p> <p>August 2005 - ongoing</p> <p>March 2007</p>
Follow-up of non-compliance.	<ul style="list-style-type: none"> <li>Ensure follow up inspections are conducted as scheduled.</li> <li>Consider adopting an assessment system whereby poor compliance results in more inspections and higher fees.</li> <li>Prepare procedure which outlines council's response to non-compliant businesses.</li> <li>Provide feedback to food business proprietors through Food News on common non-compliant issues identified in past quarter.</li> </ul>	<p>August 2005</p> <p>September 2007</p> <p>September 2006</p> <p>March 2006</p>

**Food Safety Management Strategy – Inspection**

<b>Food Act Task – Inspection</b>	<b>Action Required/Further Opportunities for Improvement</b>	<b>Timeframe</b>
EHO's have further powers under s. 21(1) and also the ability to seize or detain food that may be in contravention of the <i>Food Act</i> (s.24)	<ul style="list-style-type: none"> <li>Investigate obtaining Food Act Seizure Book.</li> </ul>	March 2006

**Food Safety Management Strategy – Food Sampling**

<b>Food Act Task – Food Sampling</b>	<b>Action Required/Further Opportunities for Improvement</b>	<b>Timeframe</b>
Strategic Food Sampling Plan	<ul style="list-style-type: none"> <li>Liaise with Analysts Labs to develop a comprehensive risk based sampling plan aimed at addressing the key elements of the Food Act and improving food safety within the Shire of Campaspe. Food to be sampled shall be selected based on food type, complaints about the business, previous sampling and compliance history, those recommended by analyst, foods which have a history of non-compliance, emerging issues and random selection.</li> <li>Groups of Councils consider trends and issues for sampling on a regional basis and this also forms part of Councils strategic sampling programs.</li> </ul>	Completed  As needed
Food Sampling Procedures	<ul style="list-style-type: none"> <li>Review procedures on food sampling activities (taking samples, selection of food/businesses, transporting samples, reporting results to proprietors and Council and procedure for non-complying food samples) to ensure compliance with the Food Act (s. 22 &amp; 23) and place on council's IMS system.</li> <li>Review sampling equipment to ensure it does not compromise the testing procedure and validity of the analysis ie thermometers not calibrated.</li> <li>Review use of formal and investigatory food samples.</li> </ul>	March 2007  March 2007  March 2007
Analysts Reports or Certificates of Analysis	<ul style="list-style-type: none"> <li>Commence reporting results of analysis to council meetings.</li> </ul>	August 2006 - Ongoing
Non-Compliance	<ul style="list-style-type: none"> <li>Develop procedure for actioning non-compliant food samples and place on council's IMS system.</li> </ul>	October 2006

**Food Safety Management Strategy – Food Complaints**

<b>Food Act Task – Food Complaints</b>	<b>Action Required/Further Opportunities for Improvement</b>	<b>Timeframe</b>
Develop a systematic procedure for dealing with and recording public food complaints.	<ul style="list-style-type: none"> <li>Review food complaints procedure and forms and place on council's IMS system.</li> <li>Monitor trends of complaints received to form basis of any further inspection or sampling program, including justified or not justified complaints to indicate more accurate level of complaints.</li> </ul>	March 2008
		March 2006

**8 FOOD SAFETY PROMOTION**

The Shire of Campaspe has developed a number of fact sheets on the following topics:

- Design and Construction of a New Food Premises
- Food Safety Program
- Food Labelling Requirements
- Food Safety Supervisors
- Food Stalls
- Selling Your Business

- Food Vehicles
- Starting up a New Business
- Food News Bulletins

Environmental Health Officers undertake to educate food businesses on food safety matters as they arise with food businesses. The recent Best Value Review of Food Safety revealed proprietors want more positive and encouraging feedback and information.

**Food Safety Management Strategy – Food Safety Promotion**

<b>Food Act Task – Food Safety Promotion</b>	<b>Action Required/Further Opportunities for Improvement</b>	<b>Timeframe</b>
Introduce more food safety promotion into all aspects of core Food Act functions.	<ul style="list-style-type: none"> <li>Introduce more food safety education materials into Food News Bulletin, including FSANZ fact sheets and information about FSANZ Food Safety Standards 3.2.2 &amp; 3.2.3, recent court cases and observed local trends as a result of inspections and food complaints.</li> <li>Conduct an annual information session for food business proprietors on issues such as FSPs. FSANZ food standards, food handling and hygiene, personal hygiene etc.</li> </ul>	Commenced - ongoing
		Annually – September

**9 PERFORMANCE MEASURING AND REPORTING**

The Auditor General's Department revealed that not all councils were monitoring or reporting food safety objectives or maintained adequate data to assess their performance against indicators and targets. The Shire of Campaspe prepares a quarterly report to Council indicating the number of inspections conducted against a target number of inspections.

A key measure of the success of the Shire of Campaspe's Food Safety Management Strategy is to regularly monitor the timeframes and review if necessary, every three years.

**Food Safety Management Strategy – Performance Measuring and Reporting**

<b>Further opportunities for improvement – Performance Measuring and Reporting</b>	<b>Action Required</b>	<b>Timeframe</b>
Monitor council performance in meeting their responsibilities under the Food Act and communicate this to the public.	<ul style="list-style-type: none"> <li>• Undertake Best Value Review</li> <li>• Develop specific key performance indicators and targets in relation to set goals and monitor them via-               <ul style="list-style-type: none"> <li>- monthly reporting to council against key performance indicators and targets</li> <li>- periodic review and evaluation of council strategies</li> <li>- performance appraisal of staff</li> </ul> </li> <li>• Monitor the Food Safety Management Strategy targets and report.</li> </ul>	Completed Completed – ongoing
EHO Resource requirements.	<ul style="list-style-type: none"> <li>• Establish formal framework to assist in determining EHO resource requirements, including consideration of optimum caseloads for EHO's and the time necessary to adequately undertake their food safety obligations.</li> </ul>	Ongoing Ongoing

**Food Safety Management Strategy – Performance Measuring and Reporting**

<b>Further opportunities for improvement – Performance Measuring and Reporting</b>	<b>Action Required</b>	<b>Timeframe</b>
Potential conflicts of interest.	<ul style="list-style-type: none"> <li>Participate in the development of a clear, corporate policy and procedure on what constitutes conflict of interests and how to deal with those situations.</li> </ul>	2008
Develop a formal process for food businesses to lodge complaints and grievances about council's inspection process.	<ul style="list-style-type: none"> <li>Introduce proprietor satisfaction forms for feedback.</li> <li>Develop procedure for investigation and resolution of complaints about council's inspection process.</li> </ul>	March 2008 March 2008

**10 CONCLUSION**

The Shire of Campaspe Food Safety Management Strategy is the framework for becoming a leader in food safety management and is the first strategy in regional Victoria. The adoption of the Shire of Campaspe's Food Safety Management Strategy will result in Council's Environmental Health Officers acting in a positive, proactive and nationally consistent manner.

It is envisaged that the food business compliance with their Food Safety Program and FSANZ Food Safety Standards 3.2.2 & 3.2.3 will improve and that safe food will be prepared and sold.