

submissions

From: Aaron Price [REDACTED]
Sent: Saturday, 23 May 2015 10:09 AM
To: submissions
Cc: [REDACTED]
Subject: Australia New Zealand Food Standards Code - submission

Good morning,

Thank you for the opportunity to lodge a submission regarding the ANZFSC. Overall the prescriptive nature of the Code is a positive for regulators of the sector. I wish to comment on three areas where I believe there should be a stronger focus, namely home based food business, the linking mechanism between the Code and Australian Standards, as well as off shore food activities (within Australian waters).

In recent years our Council has experienced a rapid increase in the number of home based food businesses. These businesses often comply with the 'home activity' planning requirements, leaving the food regulations and Code as the primary oversight of their activities. My concern is that there are inherent issues with this type of business that result in an elevated food safety risk (greater than one might anticipate). The regular advice given to Environmental Health Officers at a state level is to assess the business activities against the Code. This is easier said than done. The legal advice we have received is that any area or equipment involved in the transportation, storage and handling of commercial food is subject to inspection. However, in order to access these areas an Officer requires the consent of the business or a warrant. This effectively results in every routine inspection being prearranged. Often there is no opportunity to observe food handling activities thus making it difficult to determine whether these activities conform to the Standards. Hardly enabling a true assessment of activities to be undertaken. It would be reasonably expected that any food handling areas are thoroughly cleaned by those involved, if they had prior knowledge of the inspection. The nature of this business type is that without the regular overheads experienced by those situated in commercial buildings they will expand and diversify to the extent that the risk is significant.

The recent introduction of a new South Australian Food Business Risk Classification process reflects the potential risk. Many home based businesses previously treated as low risk have since been reclassified as Priority 1 and 2. Specific requirements for home based activities in the current Code are few and far between. I believe that as a consequence of prohibitive access there should be greater regulatory expectations rather than exemptions for this type of business.

Is it possible for the linking mechanism between the Code and Australian Standards (e.g. AS 4674-2004) to be tighter? The relevant Australian Standards are a terrific complementary document. However, as the Code does not direct call them up, their positive impact on food safety is impeded.

Lastly, I am unsure whether the Code can address this concern, but there are businesses such as charter boats and adventure focussed activities that occur on the open waters outside of any local government jurisdiction. Is there any way that the Code can cover these activities?

I look forward to seeing the finished product. Even in its current form, the Code is one of the most useful resources for an Officer involved in public health regulation.

[REDACTED]

Kind regards

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DRAFT Regional Public Health Plan 2015 - 2020
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