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Supporting document 3

Draft Implementation Guidance – Proposal P1053

Executive summary

FSANZ has prepared and is seeking public comment and input on a proposed standard on food safety management tools. Implementation of the proposed standard – if approved – is the responsibility of the state and territory jurisdictions.

The Implementation Sub-Committee For Food Regulation (ISFR) is a committee where Australian and New Zealand food regulators meet to discuss and determine common approaches to implementing food standards which are then agreed and produced as guidelines. The purpose of these guidelines or guidance is to assist businesses and regulators implement standards. The guidance sets out regulators expectations and requirements on what businesses should do to achieve compliance with standards developed by FSANZ and agreed to by the Food Ministers Meeting.

ISFR established a Food Safety Management Implementation Working Group (IWG) to develop draft guidance for implementation of the proposed standard, if approved. The IWG is comprised of government officers from each state and territory responsible for food safety in the food service sectors. In developing its implementation guidance, the IWG engages industry stakeholders and local government enforcement officers through relevant state and territory engagement forums.

The IWG has prepared draft guidance for Standard 3.2.2A– Food Safety Management Tools. The draft guidance is set out in this Supporting Document. It explains how the standard proposed by FSANZ, if approved, is likely to be implemented by the state and territory jurisdictions i.e. what it will mean for the food service sectors. The content is subject to FSANZ’s decision on the proposed standard, which will be informed by public submissions.

The draft guidance is provided for information and comment.

**A Guide to proposed Standard 3.2.2A– Food Safety
Management Tools**

Does this apply to my business and what do I have to do?

**Information for food businesses on the application of the proposed
standard**

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Acronyms

FHT – food handler training

FSS – food safety supervisor

E – evidence

PHF – potentially hazardous foods

RTE – ready-to-eat (food)

RTO – registered training organisation

SOP – Standard operating procedure

Introduction

This document provides preliminary guidance on how the proposed Standard 3.2.2A could apply to businesses in Australia, and what they would be required to do to comply with the proposed Standard. It is recommended that this document be read in conjunction with proposed Standard 3.2.2A.

Some jurisdictions already have requirements for these tools in place for Category 1 & 2 businesses, therefore they may have been introduced by your business.

Does the proposed Standard apply to my business?

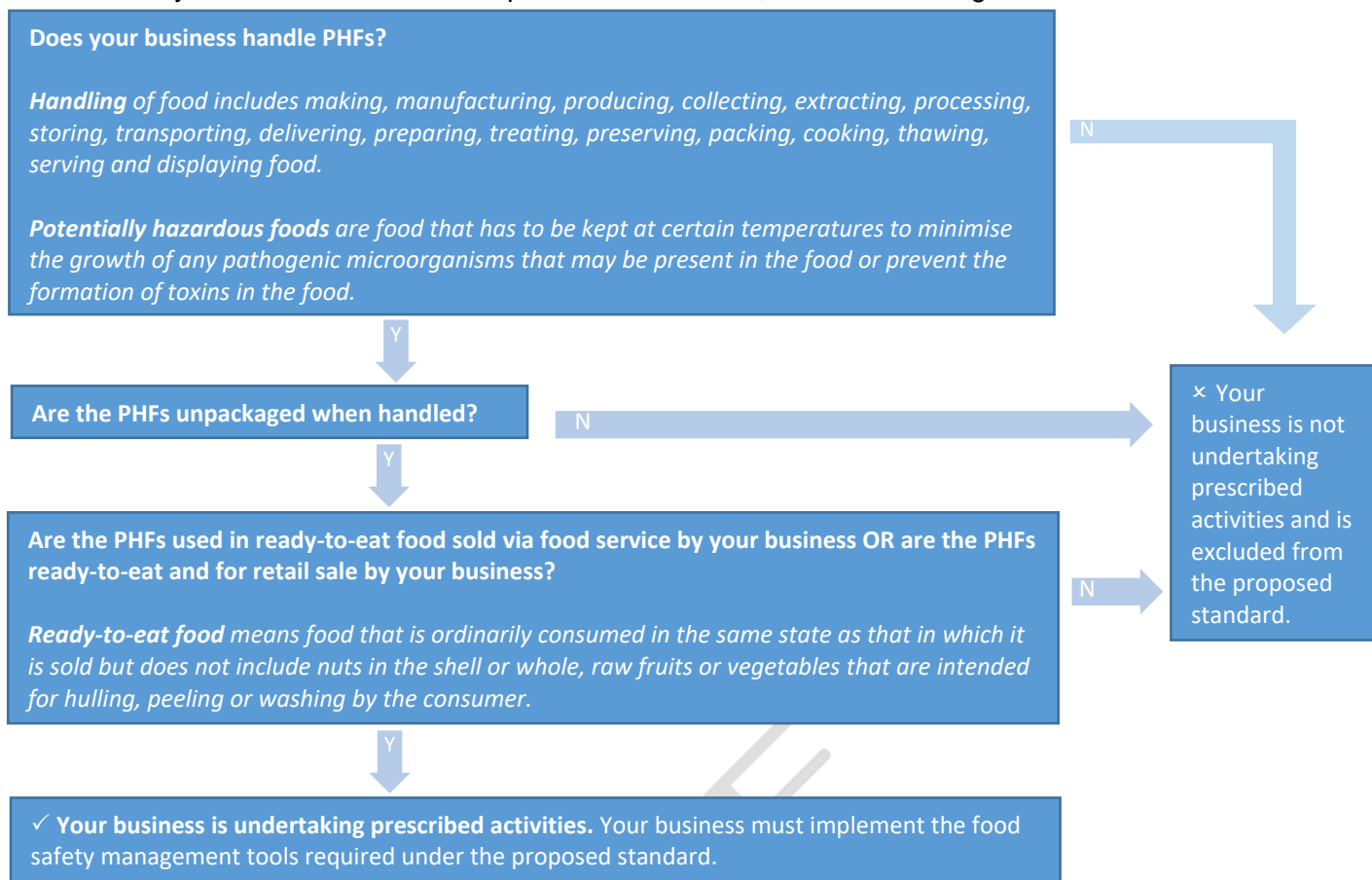
The proposed Standard applies to all food businesses in Australia that are captured as either a category one or two business. Category one and two businesses undertake prescribed activities, which means they handle unpackaged potentially hazardous food and sell it as ready-to-eat (RTE) potentially hazardous food via retail sale or food service. Examples of category one and two businesses include:

- Restaurants, cafés, pubs, and hotels with table service, takeaway & smorgasbords;
- Supermarkets and deli's that process and serve ready-to-eat food e.g. cooking a hot chicken, or that slice, weigh and wrap deli meats;
- Takeaway shops, mobile food vendors and juice bars that prepare, package and serve food to the consumer either onsite or via delivery for consumption elsewhere; and
- *Hospitals, aged care facilities and childcare centres that prepare and serve food.

*These businesses are likely to have already implemented the tools required by the Standard as part of their food safety program requirements.

Businesses that undertake manufacturing or primary production activities are **excluded** by this proposed Standard unless they also conduct activities that capture them as a category one or two business. The handling of food at fund raising events is also excluded from complying with this proposed Standard.

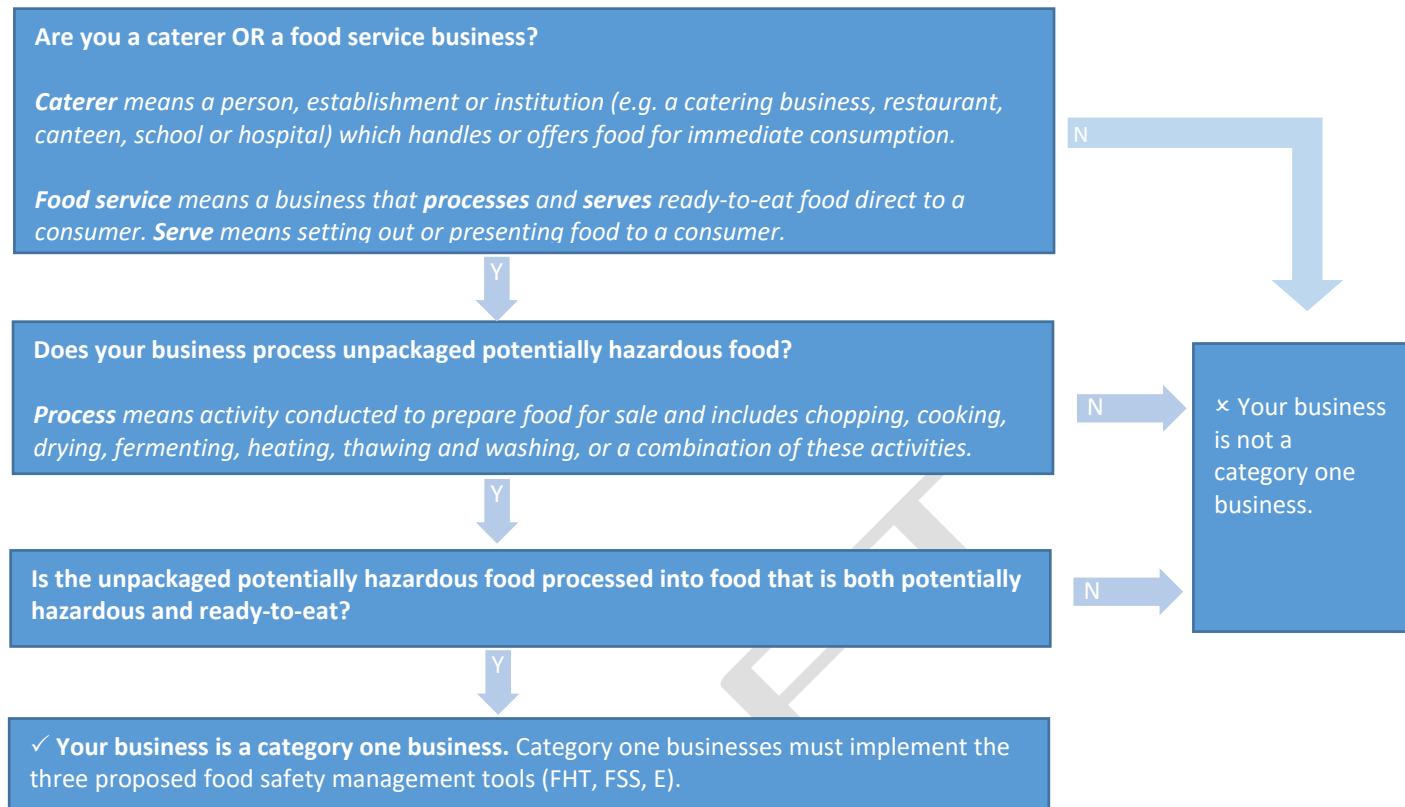
To check if your business undertakes prescribed activities, use the following flow chart:



Businesses that are not category one or two businesses, must continue to comply with the Food Safety Standards (Standards 3.2.2 and 3.2.3) and any other applicable legislation. However, businesses can implement any of the other requirements of the standard voluntarily.

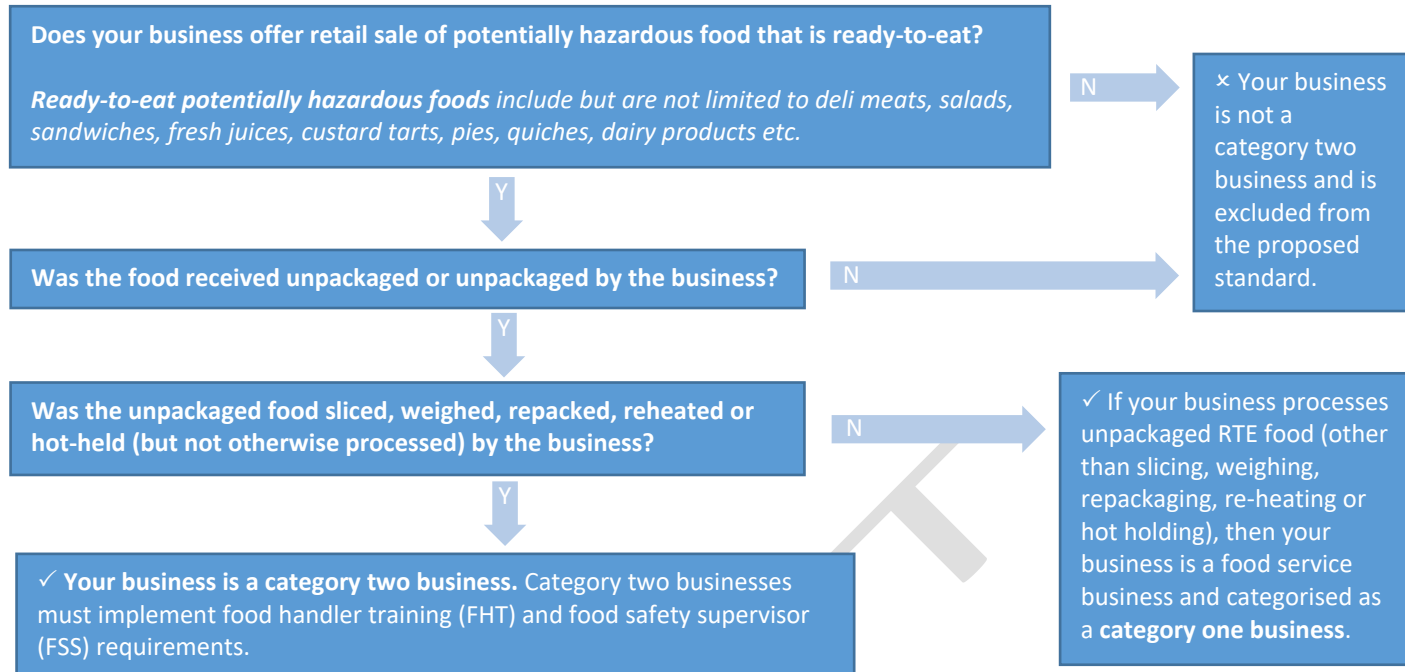
What is a category one business?

Category one businesses are business that make and serve potentially hazardous foods to consumers for immediate consumption. Answer the following questions to check if your business is a category one business:



What is a category two business?

Category two businesses are those that minimally handle, but do not make, potentially hazardous ready-to-eat food before its retail sale.



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Food Handler Training (FHT)

The proposed food handler training (FHT) tool requires both category one and category two businesses to ensure all food handlers have completed a food safety training course before they undertake any prescribed activities, or that they have appropriate skills and knowledge before they start handling high risk foods.

Completing food handler training ensures that food handlers have the knowledge to handle high risk foods safely. A food safety training course must include information on:

- Safe handling of food:
Which includes temperature control measures for potentially hazardous food and the danger zone;
- Food contamination:
Which includes strategies to keep raw and cooked food separate, allergen management, storage, and using separate utensils and chopping boards;
- Cleaning and sanitising of food premises and equipment:
Which includes correct procedure for cleaning, then sanitising using food safe cleaning and sanitising chemicals and using heat as a sanitiser; and
- Personal hygiene:
Which includes obligations for sick employees as well as handwashing, uniforms and grooming.

Where can I find a food safety training course?

Food handler training courses include existing online free training courses hosted by states or territories (such as [DoFoodSafely](#) hosted by Victoria) or local government (I'm Alert Food Safety), and also internally developed company training programs taught to new employees. Internally developed food handler training programs may be tailored to a business' procedures and can be implemented by the Food Safety Supervisor but must cover the above information. These courses do not have to be provided by an RTO but must cover the content listed in the above dot points.

What if a food handler hasn't completed a food safety training course, but knows how to handle food safely?

If a food safety training course has not been completed the food handler can still engage in prescribed activities if they can demonstrate that they have appropriate skills and knowledge to do so. This can only occur in circumstances where a business identifies that a food handler has learnt food safety skills and knowledge through experience in the food industry and/or through other means of education or training. This must be assessed by the business before the food handler undertakes the prescribed activity. The ability to demonstrate adequate skills and knowledge for prescribed activities will be assessed by an authorised officer during a food safety inspection or audit.

If a food handler has not completed a food safety training course and does not have the required skills and knowledge, they must not undertake prescribed activities, but can do other tasks within the business such as cleaning, handling low risk foods, taking orders and/or waiting tables.

Food Safety Supervisor

The proposed food safety supervisor (FSS) tool requires both category one and category two businesses appoint a food safety supervisor before they engage in prescribed activities.

A person appointed as a food safety supervisor must:

- Have a valid **food safety supervisor certificate** (must be issued within the last 5 years);
- Have food safety skills and knowledge, related to the foods that are handled and processes undertaken by the business; and
- Be given authority by the business to manage and give direction on safe food handling to others within the business;
- Be **reasonably available** to supervise food handlers when engaging in prescribed activities.

What is a food safety supervisor certificate?

A food safety supervisor certificate is a Statement of Attainment or similar certificate*, indicating the participant has successfully completed the units of competency of a food safety supervisor course. The course must be delivered by a registered training organisation (RTO) that is accredited through the Australian Skills Quality Authority (ASQA) to provide the following units:

- the retail unit SIRRFSA001 – *Handle food safely in a retail environment*, or
- both hospitality units SITXFSA001 – *Use hygienic practices for food safety* and SITXFSA002 – *Participate in safe food handling practices*.**

* Such as the NSW Food Safety Supervisor certificate

**In 2022 the hospitality units are anticipated to be superseded by SITXFSA005 and SITXFSA006, which will share the same subject titles.

A relevant authority may also recognise a particular organisation to deliver the training course and provide relevant qualifications. For more information contact your [food enforcement agency](#).

For the purposes of this proposed standard a food safety supervisor certificate is valid for five years. Some RTOs may offer refresher food safety supervisor courses for those who have received the qualification previously, alternatively if this is not an option, a complete course will need to be repeated every five years.

What is the role of a FSS?

A food safety supervisor ensures food hygiene and safety standards are maintained within the food business. Using the knowledge gained with the food safety supervisor certificate, an FSS should have the skills to handle food, particularly high-risk food, safely and to recognise, prevent and alleviate potential food safety hazards at the business.

Food safety supervisors must oversee food handling operations in the business, and give direction to and educate other food handlers on safe food handling practices. FSS' should be onsite to supervise food handling and be involved in the day-to-day operations of the food business. They must be **reasonably available** as a point of contact for food handlers and authorised officers. In addition to working onsite, reasonably available can include being contactable via phone if established procedures are in place. It is not reasonable for a business to appoint a non-food handler or non-onsite employee to the role of FSS.

Examples of *reasonably available*

Example

A person works half days, commencing at midday each day and is not contactable outside his or her working hours. Breakfast is served from 8am and lunch preparations commence at 11am. This person would not be considered to be reasonably available to be contacted at all times while the food business is being carried on. However, subject to meeting other criteria, the person may be the food safety supervisor for the afternoon shift, with a different person nominated as the food safety supervisor for the morning shift.

Example

A proprietor has two food businesses in neighbouring suburbs. Each food business has a separate on-site manager and the proprietor works out of either store depending on the spread of staff and customer demand. The proprietor is contactable by mobile phone at all times that each food business operates and written procedures are in place at both sites. The proprietor nominates themselves as the food safety supervisor for both food businesses.

Note, NSW and ACT individuals are only permitted to be appointed as an FSS at one premises.

Example

A sporting club kitchen closes at 9pm but the club remains open until 11pm for entertainment activities. A food safety supervisor would not be required to be available for the period after 9pm even though the business is open.

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Evidence

The proposed evidence (E) requirement applies only to category one businesses. These businesses must maintain **records** or demonstrate via other suitable means to authorised officers that specific **prescribed provisions** in Standard 3.2.2 are being managed or met. The business must show how the prescribed provision has been achieved or verified.

Records

Record, for the purposes of this proposed Standard, means a document or piece of evidence where information has been accurately documented and can be referred to later. Records can include:

- entries onto paper templates or captured electronically;
- standard operating procedures; or
- information on a template, invoice (e.g. a receipt temperature), graph from a 'data logger', or data recorded in any other way that allows the information to be captured, kept for the required amount of time, and produced when requested.

Records should be made on each day the business is open and operating and should have date marking to identify when the record was made and which food, process or procedure the record relates to. The proposed standard requires records to be kept for at least 3 months after it was made. Records must be made available upon request to an authorised officer, therefore should be available at the business at any time the business is operating.

Some record templates are available in Appendix 8 of [Safe Food Australia](#). Businesses can adapt templates to suit their business needs, as long as the record clearly demonstrates that the provision of the proposed Standard is met. Individual councils or state jurisdictions may also have record templates available.

Examples of substantiating matters using records:

- A food handler checks the temperature of meat when delivered using their probe thermometer. The food handler writes the temperature on the delivery invoice and keeps the invoice for the required 3 months in a folder onsite at the business.
- A food business does not have a dishwasher for cleaning and sanitising, hence all food contact surfaces are cleaned and sanitised using detergent, water and a chemical food grade sanitiser. The business already has an established procedure for cleaning and sanitising using chemicals, which all staff conducting cleaning and sanitising are aware of, but this procedure is not documented. The business writes down their procedure, laminates it and places it in the dish washing area. The procedure includes what needs to be cleaned and sanitised and when, what chemicals are to be used and how, and the steps for cleaning and sanitising. The food safety supervisor will run a session for all existing staff to reinforce the procedure and all new staff are trained in this procedure as part of their induction.

Prescribed provisions

The prescribed provisions are specific clauses in Standard 3.2.2 that relate to temperature control and processing of potentially hazardous foods and cleaning and sanitising. Non-compliance with these clauses can directly affect the safety of ready-to-eat potentially hazardous foods, therefore these processes require strict control. Where a food handler identifies non-compliance with a prescribed provision corrective actions must be put in place, corrective actions should be recorded.

The following table summarises the prescribed provisions in the proposed standard, the legal requirements and how your business can meet the requirements:

Prescribed provisions Standard 3.2.2	What do I need to show?	What do I need to record?	Suggested frequency of record
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<p><i>subclause 5(3)</i> A food business must, when receiving potentially hazardous food, take all practicable measures to ensure it only accepts potentially hazardous food that is at a temperature of – (a) 5°C or below; or (b) 60°C or above, unless the food business transporting the food demonstrates that the temperature of the food, having regard to the time taken to transport the food, will not adversely affect the microbiological safety of the food.</p>	<p>The temperature of potentially hazardous foods when received. OR The time temperature arrangement with the supplier showing the food has not been adversely affected.</p>	<p>Food received and its temperature. OR Time taken to deliver food.</p>	<p>Each delivery</p>
<p><i>paragraph 6(2)(a)</i> A food business must, when storing potentially hazardous food store it under temperature control.</p>	<p>The temperature of potentially hazardous foods during storage.</p>	<p>The temperature of potentially hazardous food during storage.</p>	<p>Daily</p>
<p><i>paragraph 7(1)(b)(ii)</i> A food business must, when processing food, where a process step is needed to reduce to safe levels any pathogens that may be present in the food – use a process step that is reasonably known to achieve the microbiological safety of the food.</p>	<p>That a pathogen reduction process/step (killing or reduction step) has been used on potentially hazardous foods to achieve safety of the food (i.e. destroying pathogens potentially present).</p>	<p>The outcome of the pathogen reduction step e.g.</p> <ul style="list-style-type: none"> • temperature of cooked food • pH of acidified/fermented food • Time & temperature of pasteurised or sous vide food • a_w of dried foods 	<p>Per batch and/or SOP.</p>
<p><i>subclause 7(2)</i> A food business must, when processing potentially hazardous food that is not undergoing a pathogen control step, ensure that the time the food remains at temperatures that permit the growth of infectious or toxigenic microorganisms in the food is minimised.</p>	<p>The time that ready-to-eat potentially hazardous foods is in the temperature danger zone (between 5°C and 60°C) is minimised and does not make the food unsafe.</p>	<p>The time taken to prepare and then re-refrigerate ready-to-eat potentially hazardous foods; or the method used to thaw RTE PHFs. This could be demonstrated using an SOP.</p>	<p>Per batch and/or SOP.</p>
<p><i>subclause 7(3)</i> A food business must, when cooling cooked potentially hazardous food, cool the food – (a) within two hours – from 60°C to 21°C; and (b) within a further four hours – from 21°C to 5°C; unless the food business demonstrates that the cooling process used will not adversely affect the microbiological safety of the food.</p>	<p>That cooked potentially hazardous foods have cooled to the prescribed temperatures within the required timeframes.</p>	<p>The time and temperatures of the food during the cooling process i.e. the length of time taken for food to cool from 60°C to 21°C, and the time taken to cool food from 21°C to 5°C.</p>	<p>Per batch and/or SOP.</p>
<p><i>subclause 7(4)</i> A food business must, when reheating previously cooked and cooled potentially hazardous food to hold it hot, use a heat process that rapidly heats the food to a temperature of 60°C or above, unless the food business</p>	<p>That cooked and cooled PHFs are reheated within 2 hours to 60°C or above.</p>	<p>The length of time taken to reheat the food and the temperature the food is reheated to. This could be demonstrated with a record and an SOP or physical</p>	<p>Per batch and/or SOP.</p>

demonstrates that the heating process used will not adversely affect the microbiological safety of the food.		demonstration of the reheating process.	
<i>paragraph 8(5)(a)</i> A food business must, when displaying potentially hazardous food display it under temperature control.	That potentially hazardous food is displayed at 5°C or below; or 60°C or above, or total time out of temperature control does not exceed 4 hours (see 2 hour/4 hour rule).	The temperature of potentially hazardous foods on display OR the length of time foods are on display.	Daily or SOP.
<i>paragraph 10(b)</i> A food business must, when transporting food transport potentially hazardous food under temperature control.	That potentially hazardous foods are transported at 5°C or below; or 60°C or above, or total time out of temperature control does not exceed 4 hours (see 2 hour/4 hour rule).	The temperature of potentially hazardous foods on display OR the length of time food is transported for.	Daily or SOP.
<i>clause 20</i> (1) A food business must ensure the following equipment is in a clean and sanitary condition in the circumstances set out below – (a) eating and drinking utensils - immediately before each use; and (b) the food contact surfaces of equipment - whenever food that will come into contact with the surface is likely to be contaminated.	That eating and drinking utensils and food contact surfaces have been cleaned and sanitised when required.	If using heat, the temperature that is reached to sanitise the surfaces. If using chemicals, an SOP on how and when the chemicals are used to sanitise the food contact surfaces.	Daily or SOP.

Other ways to demonstrate compliance to authorised officers

The default requirement for providing evidence is to have records showing how the business complies with the prescribed provisions, however there is an allowance in the proposed standard for a business to demonstrate compliance in other ways. This can include, physical demonstration of an activity and any other method an authorised officer deems appropriate. If a business wants to explore the use of alternative evidence, they should contact the relevant authority to check whether the proposed method is appropriate. Any alternative evidence must be to the satisfaction of the authorised officer and must clearly demonstrate how the business undertakes the prescribed provision and that the business complies with the prescribed provision.

Examples of demonstrating compliance:

- Standard 3.2.2-10(b) requires all potentially hazardous food to be transported under temperature control. Rather than using temperature control, a pizza shop delivers takeaway pizzas using time as the control. The pizza shop cooks the pizzas, puts them in an insulated bag and delivers them within 10 minutes of cooking. The pizzas are only delivered within a 5km radius (approximately 20 minutes by car). The business has a map showing the 5km delivery radius and all delivery drivers and those collecting phone orders are aware of the procedure to ensure all PHFs are delivered within 30 minutes of cooking.

How will the proposed standard be monitored and enforced?

Compliance with the proposed standard will be monitored during routine food safety inspections or audits by authorised officers.

Authorised officers will review records (where required), observe and ask questions to determine if a business is complying with the standard.

It is not intended that additional inspections or audits will be required as a result of implementing the proposed standard, however it may mean that authorised officers need additional time at the business to complete their audit or inspection.

Case studies

The following scenarios are provided as guidance for food businesses on the proposed Standard 3.2.2A and how its proposed to be implemented across different business types. The scenarios provide several examples, but there may be other business types also covered by the proposed standard. Two 'A day in the life' examples are also provided, to explain the sorts of records or other evidence a business could make to substantiate that their key activities are properly managed.

Examples of businesses the proposed standard would apply to

1. A restaurant

Milo's Sydney restaurant makes and serves a range of meat and vegetarian dishes, for customers to eat there or take away. Milo's restaurant is a **Category 1** business because it both makes and sells meals, which are ready to eat without any further preparation by consumers.

Milo needs to understand and manage many food safety risks before, during and after the restaurant meals are prepared. For example, meat, fish, dairy and egg products need to be received and stored cold. Cooked dishes need to be cooked properly at the right temperature for the right amount of time. Once a dish is ready to eat, it needs to be served within a short time or held at temperatures that keep it safe.

Milo checks the new standard and sees that:

- His business needs to have a qualified Food Safety Supervisor (FSS), but he already has one because NSW already required it.
- His staff that prepare the meals (e.g. kitchen hands) will all need to complete a food safety course (FHT) that covers the specific topics in the standard (they can do this online). This training can be completed for free online.
- His business will also now have to have evidence (E) that shows how they are keeping food safe. This includes the standard operating procedures he already has, as well as records of temperature checks (for food storage, cooking and cooling), and cleaning and sanitising. These will help Milo ensure his business is taking food safety seriously and doing things correctly. The evidence will also help him show regulators he is complying with the standard.

2. A bakery that makes and retails its own products

Kim's bakery in South Australia makes and sells a range of goods on site, including Vietnamese rolls and pastries containing egg-custard and cream. Kim's bakery is a **Category 1** business because it both makes and retails these foods.

Because of the type of food she sells, Kim needs to manage many food safety risks, from receiving and storing ingredients, through processing steps, to displaying and serving the final products. Kim speaks to SA Health to check what she needs to do. For Kim, the new standard means:

- She will have to have a Food Safety Supervisor (FSS). She decides to complete this training herself as she is the one who generally supervises the food handlers.
- The two food handlers she works with will need to complete food handler training (FHT). This training can be completed for free online.

- Her business will have to keep evidence (E) to show how they manage their food safety risks. Staff are already monitoring the temperature of potentially hazardous food (e.g. meat, dairy, egg products) when it is received, stored, and displayed, now they will also record the outcome on a template. Kim knows how long staff take to prepare potentially hazardous foods (e.g. whipped cream, egg butter and custard, shredded salad) out of the fridge on the bench. They have a well-established procedure using the 2-hour/4-hour rule to manage the amount of time these foods are out of temperature control. To provide evidence of this she writes an SOP based on their existing process.

'A day in the life' – bakery making PHF sandwiches (for direct order – prepare/serve)

The example below sets out 'an average day', explaining how a bakery could use the evidence tool and demonstrate to an authorised officer how the evidence tool has been implemented by the business.

A staff member arrives on site and before starting any preparation for the day, checks the temperature of the food in the fridge and/or checks the temperature of the fridge (if a calibrated gauge is used). The food in the freezer is also checked to make sure it is still hard frozen. These checks ensure that any potentially hazardous food (PHF) being used for the day has been stored correctly under temperature control overnight and the food is safe to use.

Food storage – the fridge or food temperature would be recorded on the business's daily temperature record sheet. The staff member checks that the equipment being used for preparation and service is clean and has been stored to prevent contamination. The benches are sanitised before food preparation begins. This may be part of the cleaning instructions and schedule (**cleaning and sanitising**). The bain marie used for chilling is turned on, so it will be cold before placing food items in later that morning.

The staff member sees that the delivery driver has arrived and goes to accept a delivery of ordered food. They wash their hands and sanitise the temperature probe. The delivery contains both dry goods and PHF. The PHF is checked first for labelling and any damage to packaging or potential contamination, then the staff member takes the temperature to ensure it is received under temperature control. A temperature infra-red gun may be used to check surface temperature, or a probe placed between two packaged units (e.g. cryovac meat packets). A probe is used if the package or food needs to be pierced to check core temperature. Once the PHF has been checked, it is immediately placed into the cool room or fridge.

Food receipt – once the PHF is checked the temperature and product name are recorded on the daily temperature sheet.

If this staff member picks up food from the supermarket on the way to the café, they could either check the food temperature on arriving at the café (e.g. if transported in cooler bags with ice packs) or manage food safety using time as a control. A standard operating procedure (SOP) could describe this in relation to food being out of temperature control for less than 2 hours.

The staff member then stocks the bain marie with sandwich ingredients from the fridge. The temperature of the food in the bain marie is checked, to ensure the equipment is maintaining temperature control.

Food storage – the bain marie temperature will then be recorded on their daily temperature record sheet.

Alternatively, the time the food is put into the bain marie is noted, and either

- the food is checked at 2 hours to ensure it is still under temperature control, or
- the food is placed back into the fridge at 2 hours or

- the food is discarded at the end of 4 hours as per the 2-hour/ 4-hour rule.

Minimising processing time – The time that food is brought out of the fridge, and the time it is placed back into fridge or discarded can be recorded. Alternatively, a SOP can be used that shows the process for the bain marie with temperature checks or time that was prepared previously. An EHO can observe this process is in line with the SOP and ask questions to confirm understanding. Temperatures and time would then not need to be recorded routinely.

Processing to achieve microbiological safety of food – Raw chicken is cooked onsite to be cut up and used for sandwiches. The core temperature of the cooked food is checked and recorded. The café is also roasting vegetables and boiling quinoa for the sandwich fillings. Cooking temperatures for these processes would not need to be recorded as the food is either only edible once cooked, or it doesn't become PHF until after it is cooked. For example, a boiled egg in its shell is not considered PHF until it is peeled.

Food cooling – If the food cooked on the day is all consumed within 4 hours or discarded, then cooling does not have to be monitored. If some of the cooked chicken and roast vegetables is cooled for use later in the day, or for the next day, cooling must be monitored. Cooling temperatures can be checked and recorded, or a SOP can be used that shows the standard process for cooling with time/temperature checks that were prepared previously. The EHO can observe this process is in line with the SOP and ask questions to confirm understanding. Temperatures and time would then not need to be recorded routinely. The quinoa is cooled using ice water and a temperature record is not required, as this is a standard process known to rapidly chill grains. The EHO may ask the staff member how it is cooled, to ensure it is meeting cooling requirements.

Reheating – If the café does not reheat any foods to hold hot, no record is needed. If this café uses a pie warmer to keep pastry items warm for service, reheating must be monitored. The products are reheated before placing in the pie warmer. The pie temperature is checked to make sure it is at least 60°C and recorded. As this is a very common practice, it can also be demonstrated by a SOP. The EHO can check the temperature of the pies in the pie warmer and observe this process is in line with procedure, or ask questions to confirm understanding. Temperatures would then not need to be recorded routinely. If the business only reheats food for immediate service (e.g. takes the pie from the fridge and reheats it in an air fryer for 5 minutes), documenting the temperature is not required, as it is not being hot held.

Food display – For direct serve, temperature records would not be required, unless sandwiches were made in advance and food safety was not managed using time.

Food transport – This business does not transport food so does not require this clause to be monitored. If the business decided to become a caterer, or for example, sell food to the local school canteen, time or temperature would need to be monitored and recorded, or a SOP used.

Cleaning and sanitising – Evidence made for this may be a schedule with the important areas to clean that is ticked as the task is completed. It may also include instructions of the chemicals to be used and the process for cleaning and sanitising. This could also include recording a temperature of the dishwasher during operation once a week.

3. An off-site catering business

Alex runs a catering business and is making bulk lasagne for another company running a function later that day and the next day. Alex doesn't sell the lasagne direct to consumers (that is, the business is an off-site caterer). Alex's business is a **Category 1** business, because the lasagne is ready to eat and will be served to people to eat at the function.

Alex needs to manage critical food safety risks with bulk lasagne prepared in advance for the function. For example, raw meat, milk and cheese needs to be received cold and kept cold. The lasagne needs to be cooked properly and then cooled safely. Once prepared, the lasagne also needs to be both stored and transported at a temperature that keeps it safe.

As a Category 1 business, Alex will need to have a certified Food Safety Supervisor (FSS), and the team making the lasagnes will need to have completed food handler training (FHT). The business will also have to have evidence (E) of, or be able to demonstrate, correct food safety controls are in place and monitored.

'A day in the life' – off-site caterer (preparing food in advance)

This example explains how a caterer could implement the evidence tool for prescribed provisions in the proposed draft standard.

Food receipt – The caterer either picks up food from the supermarket, has delivery by a supermarket, or receives food from a distributor the same as above for the café example. The same process applies as the above example for the café.

Food storage – The process is also the same as the café. The food or the cool room, fridge air temperature (or ideally the probe is in water) is checked for temperature control and recorded. If this caterer is quite large, they may also decide to have the cool room/fridge monitored by a data logger or alarm. They do not have to record the temperature monitoring daily but should check that the readings are correct and can show this readout to the EHO upon request.

Achieving microbiological safety of food – The caterer cooks chicken and beef, sous vide in a water bath. The caterer must be able to demonstrate that they know the time and temperature requirements to ensure the food is safe (e.g. 65°C for 10 minutes + 150 minutes, the time taken to heat the 4 cm thickness of food to this temperature for cooking). The batch food thickness and heating + cooking time should be recorded. The caterer cooks trays of chicken Kiev's in the oven. The largest Kiev should be checked to ensure that this is cooked thoroughly to the core and recorded.

Minimising processing time – The caterer prepares bulk sandwiches and also slices the sous vide meat to be used at the event the next day. The caterer has a process where they bring the sandwich ingredients and cooked meat out of the fridge for 1 hour, and after two trays have been filled, put that batch of sandwiches in the fridge before starting on the next two trays. They repeat this process until all the ingredients are used or the 1 hour is reached, and they place the ingredients back in the fridge. Alternatively, they have a chilled bain marie (as per the café requirements) to store their ingredients under temperature control. A SOP could be developed for this and confirmed by the EHO on site. Otherwise, the time the ingredients come out of the fridge, and the time they are used up, or put back in, could be recorded.

Food cooling – Food is cooked by this caterer the day before the event. Cooling requirements would be similar as for the café, with either the largest food volume monitored and recorded for each batch, or a SOP could be used where the size, food type and process is consistent and temperatures previously validated.

Food reheating – The caterer reheats the sliced sous vide chicken and places it in a hot bain marie for plating and service. The temperature of the chicken is checked to make sure it is 60°C or above. This food is all plated, served and consumed within 1.5 hours. If the food was not consumed within 2 hours, the temperature of the chicken would be rechecked and recorded to ensure it was being held under temperature control.

Food display – This caterer does not display food at every event, although on occasions will provide a self-serve option for the client, where bain marie equipment is available.

Requirements are similar to 7(4) above. e.g. If the food was not consumed within 2 hours, the temperature of the chicken would be rechecked and recorded to ensure it was being held under temperature control.

Food transport – This caterer has a refrigerated delivery van to transport the food under temperature control. The caterer may monitor and record the temperature of the van cavity or record the temperature of the food in the van. The caterer also uses a non-refrigerated van when they have large events. Food safety is maintained by packaging food in an insulated cooler or ensuring time out of temperature control is minimised. The temperature of the food on delivery to the event should be checked and recorded, or time recorded if the event was less than 2 hours' drive.

Cleaning and sanitising – Evidence kept for this may be a schedule with the important areas to clean, which is ticked as the task is completed. It may also include instructions of the chemicals to be used (contact time, dilution, rinse or no rinse, etc.) and the process for cleaning and sanitising. This could also include recording a temperature of the dishwasher during operation once a week. Cleaning and sanitising of equipment at the venue may also need to be considered for this caterer.

4. A delicatessen

Robbie owns a deli business in WA that sells cheeses, cured and cooked meats, and cooked seafood. He buys pre-packaged products in bulk, then he and his team open and divide them into smaller portions or slices to sell to consumers. Robbie's business is a **Category 2** business because it doesn't make the deli food, it just minimally processes it (e.g. slices, weighs, wraps it in paper) to sell to consumers.

Robbie and his team need to understand and manage critical food safety risks with the unpackaged deli foods while they unwrap them, portion them out, display and serve them.

Under the new standard, Robbie will need to be or have a qualified Food Safety Supervisor (FSS), and his three staff who directly handle unpackaged deli foods will need to complete food handler training (FHT), which is available for free online. Robbie will not have to keep records of food temperatures or cleaning and sanitising, although this is best practice and would help him to be sure things have been done properly.

5. A café that serves pre-prepared snacks and lunches

Jess runs a small café alongside her art and craft gallery in Tasmania. She sells unpackaged sandwiches, quiches and pre-cut fruits and salads made by another company. Jess doesn't do any of the cooking or other food preparation herself; she just serves out portions to her customers. Jess's café is a **Category 2** business because it doesn't make the food, but minimally processes by taking the sandwich out of the package, or reheats the quiche, before serving.

Under the new standard, as Jess is the only food handler in the business, she will need to be a qualified Food Safety Supervisor (FSS). She doesn't have to do the additional food handler training because the Food Safety Supervisor qualifications cover the FH training content. Jess will not need to keep records of food temperatures or cleaning and sanitising, although this is best practice and would help make sure things have been done properly.

However, if Jess decides to start making her own food she would need to consider whether this food is a potentially hazardous food and would mean that her business becomes a Category 1 business, requiring her to keep evidence of the safe handling of that food.

Examples of where proposed Standard 3.2.2A would NOT apply

1. Service station that sells pre-packaged foods

Jay's service station sells pre-made, pre-packaged sandwiches, sausage rolls and pies prepared by another business. Jay buys these foods in cartons of single-wrapped units and simply places them in a display fridge or hot oven unit ready to sell to consumers. The proposed standard wouldn't apply to Jay's business, because it only sells food that's been kept in its original packaging.

Jay's food safety risks are lower than a Category 1 or 2 business because the food remains packaged. He mainly just needs to safely store and display the food. Jay will still need to comply with the general food safety requirements of Standard 3.2.2 and 3.2.3.

2. Ham manufacturer

A food manufacturer processes bulk raw pork into ham products, including bulk cured ham sold at delicatessens and packaged sliced sandwich ham sold in supermarkets. The proposed standard wouldn't apply to the manufacturer because:

- the business does not serve the food or sell it direct to consumers, and
- the ham products are not in a form that a consumer would normally buy to eat right away. The bulk ham supplied to a deli will be unwrapped and sliced before retail sale. The supermarket packaged ham will need to be unsealed by the consumer to use in sandwiches, salads, etc.

This business will still need to meet the general food safety requirements in Standards 3.2.2 and 3.2.3 and the meat primary production and processing Standard 4.2.3.

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