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Re: Combined submission from NAQ Nutrition Training and Nutrition Australia – Comments on chapter 3 and 4 review

Thank-you for providing NAQ Nutrition Training and Nutrition Australia and with the opportunity to provide comment on the review of Food Standards Code chapters 3 and 4 – Food Safety Management Requirements.

As a key, not for profit, community based, organisation, Nutrition Australia continues to work collaboratively with government, private and other community organisations to ensure safe food supply is achieved and maintained. NAQ Nutrition Training is a Registered Training Organisation (RTO) and sits within Nutrition Australia's Queensland division. NAQ Nutrition Training has operating as an RTO for over 10 years delivering Food Safety Supervisor Training nationally (with the exception of NSW) specifically for people and organizations catering for vulnerable populations and school settings. Training is contextualised for aged care, childcare/early years and school environments (canteens and tuckshops). Our training ensures high quality training and learning that meets the needs of our students.

NAQ Nutrition Training and Nutrition Australia support the current review (of the scope and approach) and would like to offer the following recommendations and comments in response to the review of Food Standards Code chapters 3 and 4 – Food Safety Management Requirements.

Recommendation 1 – Food Safety Supervisor Training

1a Mandatory Food Safety Supervisor Training for Food Safety Supervisors

NAQ Nutrition Training and Nutrition Australia support the call for a nationally consistent approach to food safety supervisor requirements and the requirement for all specified food businesses to have a food safety supervisor. NAQ Nutrition Training and Nutrition Australia recommend that in addition to a requirement for food businesses to have a food safety supervisor, that the Code outline the training requirements for food safety supervisors. As a Registered Training Organisation (RTO) we have noted different training expectations and requirements for food safety supervisors between local government areas within state jurisdictions, for example in Queensland - Brisbane City Council vs Gold Coast City Council that require food businesses to have a food safety supervisor.

NAQ Nutrition Training and Nutrition Australia recommend that food businesses be required to have evidence of completion of nationally recognized competency-based training by their food safety supervisors. Requiring that food safety supervisors have undertaken training with an RTO registered with the Australian Skills Quality Authority (ASQA) has the potential to assist in ensuring that food safety supervisors receive nationally consistent, high quality training and assessment.

Clause 1.7 of the Standards for Registered Training Organisations 2015 states that “The RTO determines the support needs of individual learners and provides access to the educational and support services necessary for the individual learner to meet the requirements of the training product as specified in training packages or VET (vocational education and training) accredited courses”.¹ Additionally ASQA requires that the VET workforce have the appropriate skills to identify and evaluate LLN requirements.² As an RTO who has been operating for over 10 years, we have seen the demographics of those working in the food industry (including those nominated to be Food safety supervisors within vulnerable population settings) to be increasingly linguistically diverse. This highlights the need for nationally consistent training with the appropriate mechanisms in place to ensure RTOs are equipped with the appropriate Language, Literacy and Numeracy skills met within in training.

For a student to demonstrate compliance in any nationally recognised qualification they are required to meet national requirements as set out by the Australian Skills Quality Authority (ASQA) including currency and sufficiency of evidence³. Through the introduction of mandatory Food Safety Supervisor training, this will ensure that those working as Food Safety Supervisors hold the sufficient knowledge, skills and currency of these to ensure safety of the food being provided.

NAQ Nutrition Training has concerns about the quality of some nationally recognized food safety online training options provided. It is recommended that food regulators work together with the Australian Skills Quality Authority to ensure that required units of competency incorporate the appropriate elements, performance criteria and assessment conditions. It is further recommended that food safety supervisors in higher risk businesses be required to attend in person training rather than online training.

Recommendation 1 – Food Safety Supervisor Training

1b Consistency of requirements for food safety refresher training nationally

It is recommended that there be consistency among requirements for food safety supervisor training nationally. For example, currently Food Safety Supervisors in the ACT and New South Wales are required to update their food safety supervisor skill set every 5 years⁴. This has not been recommended in Queensland.

Recommendation 2 - 3.2 Codex General Principals for Food Hygiene

Mandatory training for all Food Handlers

Nutrition Australia has over 20 years delivering food safety training nationally to all types of settings (including vulnerable populations). We support the recommendation for mandatory training for all food handlers. This supports guidelines from other regulatory bodies working with food businesses catering for vulnerable populations. For example ACECQA (Australian Children’s Education and Care

Quality Authority) highlight food safety as a required skill and knowledge as identified in the National Quality Standard Element 2.1.2 - Health practices and procedures (*Effective illness and injury management and hygiene practices are promoted and implemented*).⁵

Comment – Section 3.3 – High Risk Horticulture

High risk horticulture use with vulnerable populations – specifically rockmelon use in childcare and aged care facilities.

Currently there are differences in recommendations nationally around the use of rockmelons for vulnerable population. The NSW Food Authority recommends ‘vulnerable populations should avoid eating rockmelons’⁶ A Qld Government – Department of Health fact sheet ‘Rockmelon Safety for Food Businesses’ does not specify the above recommendation made by the NSW Food Authority.⁷ When delivering nationally recognised training to vulnerable populations it can become confusing for students with different recommendations through the states.

Yours sincerely



Ms Sharyn Deam – CEO NAQ Nutrition Training/Executive Officer Nutrition Australia Qld (*on behalf of Nutrition Australia*)

Please forward correspondence to:

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Reference List

¹ Australian Skills Quality Authority, *Clauses 1.7, 5.4 and 6.1 to 6.6—Supporting and informing learners; managing complaints and appeals*, viewed 23rd May, <https://www.asqa.gov.au/standards/chapter-3/clauses-1.7-5.4-and-6.1-6.6>

² Australian Skills Quality Authority *Updates to trainer and assessor credential requirements to come into effect from April 2019* viewed 23rd May, <https://www.asqa.gov.au/news-publications/news/updates-trainer-and-assessor-credential-requirements-come-effect-april-2019>³ Australian Skills Quality Authority, *Clauses 1.8 to 1.12 – Conduct effective assessment*, viewed 20 May 2019, <https://www.asqa.gov.au/standards/chapter-4/clauses-1.8-1.12>.

⁴ ACT Government – Department of Health 2019, *Food Safety Supervisor Training Guidelines*, viewed 20 May 2019, <https://health.act.gov.au/sites/default/files/2019-03/Food%20Safety%20Supervisor%20-%20Training%20Guidelines.pdf>.

⁵ Australian Children’s Education and Care Quality Authority, *Quality Area 2 – Children’s health and safety*, viewed 20 May 2019, <https://www.acecqa.gov.au/nqf/national-quality-standard/quality-area-2-childrens-health-and-safety>.

⁶ NSW Food Authority information sheet 2018, *Rockmelons*, viewed 20 May 2019, <http://foodauthority.nsw.gov.au/foodsafetyandyou/special-care-foods/rockmelons>.

⁷ Queensland Government, Department of Health, *Rockmelon safety for food businesses*, viewed 20 May 2019, https://www.health.qld.gov.au/data/assets/pdf_file/0021/710193/rockmelon-safety-for-food-bus.pdf