National Food Safety Audit Implementation Framework – Consultation Report

A summary and analysis of the comments received on the National Food Safety Audit Implementation Framework Discussion Paper

Prepared by the Implementation Sub-Committee of the Food Regulation Standing Committee
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DISCLAIMER:
This document was prepared by the Implementation Sub-Committee Auditing Working Group for the purpose of summarising submissions made to the National Food Safety Audit Implementation Framework Discussion Paper. This discussion paper was put to public consultation from 24 June 2005 to 12 August 2005.

Typographical errors have been amended and responses have been collated into similar themes to simplify reporting. Submissions have been reported by three key organisational groups, Government (both State/Territory, Commonwealth), Industry, and Food Safety Auditors (which includes submissions from local city councils).
How would you describe the organisation you are providing comments for?

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Number of responses</th>
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<tbody>
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<td>a) Peak food industry body</td>
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<td>b) Professional association</td>
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<td>c) State/territory government department / body</td>
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<td>d) Local government</td>
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<td>e) Certification body or quality system owner</td>
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<td>f) Training industry</td>
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<td>g) Large food business</td>
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<td>h) Small food business</td>
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<tr>
<td>i) Food safety auditor</td>
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<td>j) Environmental health office</td>
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<tr>
<td>k) Other</td>
<td>5</td>
<td>5 - Importer &amp; distributor of food ingredients</td>
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<td></td>
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<td>11 - not specified</td>
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<td></td>
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<td>18 - Provider of Health and Nursing Services</td>
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<td>19 - Research &amp; Industry development</td>
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<td></td>
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<td>37 - New Zealand Food Safety Authority</td>
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Note: Out of 47 respondents, 4 responded with more than one organisation category

These 47 submissions were broken into the following categories. Organisations that identified themselves as (k) Other, were placed in the most appropriate category.

<table>
<thead>
<tr>
<th>Category</th>
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<tr>
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<td>e) Certification body or quality system owner</td>
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<tr>
<td></td>
<td>i) Food safety auditor</td>
</tr>
<tr>
<td></td>
<td>j) Environmental health officer</td>
</tr>
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</table>
## Issue 1: Options for categorising food safety auditors

Need for all state and territory governments to use the same classifications of food safety auditors when approving them to help facilitate mutual recognition and simplify requirements for industry and auditors

### Must include

<table>
<thead>
<tr>
<th>Question</th>
<th>Industry</th>
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<td>15</td>
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<td>12</td>
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<tr>
<td>B: High-risk processes critical to public health and safety that require technical knowledge to audit competently, for example, pasteurisation and retorting (canning)?</td>
<td>12</td>
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<tr>
<td>C: High-risk activities, that is, food service to vulnerable populations, and catering to the general public? Consider whether different skills and knowledge are required to audit these businesses over medium-risk businesses.</td>
<td>10</td>
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<td>D: Broad agrifood industry sector, that is, food retail/service, transport and warehousing manufacturing/processing, primary industries?</td>
<td>6</td>
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<tr>
<td>E: Specific industry sectors, for example dairy products, horticulture, etc. (recommended by ANZFA and currently part of RABQSA auditor scopes/industry groups)?</td>
<td>10</td>
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<td>F: Industry sector technical process knowledge, that is, knowledge of particular industry technical processes (excluding the high-risk processes discussed above) in low- and medium-risk food businesses?</td>
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<td>G: Length of auditing experience, for example Provisional Food Safety Auditor, Food Safety Auditor, Principal Food Safety Auditor? (currently part of RABQSA auditor categories)</td>
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### Desirable Only

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</table>
Comments A: Varying levels of auditors based on competencies to audit varying risk classifications of food businesses?

Must Include

Government
- Criteria for approving food safety auditors should be based on skills and knowledge ideally defined under the National Training System, and based on food business risk classifications
- To ensure the pool of competent approved food safety auditors meets demand, there should be a level for auditors with minimum competencies to audit low risk businesses. Auditors with high levels of expertise should be recognised as being able to audit businesses with high risk classification.

Industry
- Recognising varying auditor competencies will allow newly trained auditors to audit lower risk FSP and experienced and qualified auditors to audit more complex and high risk FSPs.
- The scope of practice that applies to regulatory auditors should be the same as that which applies to non-regulatory (i.e. independent) food safety auditors. This needs to be in line with the proposed RABQSA Criteria for Accredited National Food Safety Auditor Certification (as developed with guidance from the National Food Safety Auditor Scheme Committee - NFSASC)

Food Safety Auditors
- It is important for auditors to know the business they are auditing. Not all businesses are in a high risk category and may require different levels of food safety practices.

Desirable Only

Government
- Specific technical knowledge is the determinant. Industry

Nil comment

Food Safety Auditors
- As all food sectors requiring mandatory FSPs under the Food Act will be high risk (at least initially), categorising auditors according to risk will only have limited benefit as it would be reasonable to expect the greatest demand for auditing to be in those sectors requiring mandatory audits (because this is where the work is) and so this is the category (high risk) most auditors would seek approval for.

Do not include

Government
- All system and compliance auditors without exception should have tertiary qualifications that include specific technical knowledge; there is no point in authorising an auditor that is not competent to assess a high-risk process. Problems can occur when a food processor changes products or processes from low risk processes to a high-risk process and the auditor cannot tell the difference.
- All regulatory food safety auditors should meet the highest level of competency to audit high risk activities in addition to medium and low risk activities and that there should not be different levels within the system for regulatory food safety auditors.

Industry
Comments B: High-risk processes critical to public health and safety that require technical knowledge to audit competently, for example, pasteurisation and retorting (canning)?

Must Include

Government
- Specific qualifications in specific field are recommended.
- Based on the activity of the business and the highest level of competency criteria being reached for regulatory food safety auditors, technical knowledge to carry out audits is essential.

Industry
- Auditors need to have high level technical understanding.
- Need for sector specialisation is required, specifically hospitals, aged care and food production environments are very different

Food Safety Auditors
- Ensures the people most familiar with certain types of industry processes are monitoring and checking systems.

Desirable Only

Government
- Nil comment

Industry
- Nil comment

Food Safety Auditors
- Using the NATA process for accreditation, where a range of tests and methodology can be highly technical and complex, consideration should be given to allowing a "technical specialist" approve a highly technical component of a food processing facility without being qualified as an auditor. It would become impossible to find an auditor who is technically qualified to audit across a range of different equipment that is likely to occur in one factory. The question would then be whether the auditor could call a "technical specialist" and whether the "technical specialist" needs to be certified and by whom.

Do not include

Government
- Nil comment

Industry
- Keep it simple. Regulators have a habit of overcomplicating issues

Food Safety Auditors
• Nil comment

Comments C: High-risk activities, that is, food service to vulnerable populations, and catering to the general public? Consider whether different skills and knowledge are required to audit these businesses over medium-risk businesses.

Must Include
Government
• Nil comment.

Industry
• Auditors need to have high level technical understanding. I feel Medium/High risk auditors need minimum tertiary qualifications at Cert IV Food Tech/Microbiology or equivalent.
• The requirement for auditor competencies will have to be managed carefully to ensure that 'just enough' training occurs to meet the needs for those businesses that are required to or have of their own volition, adopted a food safety plan. Training beyond this threshold would incur additional cost without commensurate benefit - industry should not be called upon to meet the cost of training that is surplus to that required.
• Vulnerable populations are recognised by most State & Territory governments as being a priority sector and therefore businesses set up to predominantly supply these groups (i.e. meals on wheels kitchens, hospital kitchens etc.) ought to be treated similarly to other high risk operations. Another high risk 'bolt on' unit covering common food service processes such as cook/chill, could be easily developed by ANTA to cover this sector. For example: Auditors would need to have knowledge of foods that should not be provided to patients with certain medical conditions, and be aware of potential issues such as patients keeping food outside of meal times.

Food Safety Auditors
• Vulnerable populations are especially at risk of serious complications associated with foodborne illness. When conducting an audit of such premises it is believed that the auditor should possess a sound understanding of the particular "at risk" group and the potential hazards and risks that are peculiar to them.
• In certifying an auditor I believe that industry experience - number of current years in an auditing role - examples of auditing processes used by auditor - provide letters of recommendation from industry leaders or companies that the auditor currently provides services for as to that auditors competency

Desirable Only
Government
• Different skills and knowledge would not be required to audit high, medium and low risk businesses. Competencies should focus on 'types' of businesses and technical knowledge.

Industry
• While it is desirable that auditors of certain food service operations have a high level of understanding of the risks involved, these principles are equally valid in any food business.
Do not include
Government
- The processes in these sectors are not complex and would not require additional technical skill or knowledge beyond general auditing experience and thorough knowledge and understanding of the fundamentals as outlined in Standard 3.2.2 and 3.2.3.
No reason to differentiate between the audits of those activities that provide food service to vulnerable populations and catering to the general public if a business is carrying out activities that are classified as high risk. Different skills are not required as the food safety hazards would be similar.

Industry
- Nil response

Food Safety Auditors
- Nil response

Comments D: Broad agrifood industry sector, that is, food retail/service, transport and warehousing manufacturing/processing, primary industries?

Must Include
Government
- Agreed national competencies across all industry sectors & risk classification. There are different risks for different sectors. Industry
- Specific & specialist area which requires specific knowledge.
- Knowledge and experience in these areas are required to ensure auditors know the industry workings. Food Safety Auditors
- This could provide a broad approach to classification without the need to further complicate the process with industry specific classification.

However, the classification of the whole food industry for the purpose of introducing a requirement to have FSPs is opposed by the AFGC. The AFGC recommends that there is a need to consider the wider application of approved auditors to lower risk sectors on a voluntary basis.

Desirable Only
Government
- Food safety auditors should have industry knowledge in order to effectively conduct audits.
- Demonstrates appreciation of the context in which the food business operates
- Desirable but not essential. It is always for an auditor to have some industry knowledge of the sector he/she are auditing. Industry
- Nil comment. Food Safety Auditors
• Environmental Health Officers feel that specific category needed for technological or highly complex manufacturing/processing sectors but not retail/service/transport.

Do not include

Government
• SFQ believe that the classifying of regulatory food safety auditors should be based on the competency of the auditor (that they meet the highest level of competency to audit high, medium and low risk activities), the technical skills of the auditor and what activity they are auditing. The issue of which agrifood industry sector the business operates in should not be relevant as the food safety hazards in any high risk activity would be similar and likewise the food safety hazards in a low risk activity would be similar.

• Food Safety Auditor skills should be common across industry sectors. Industry
• Nil comment. Food Safety Auditors
• Nil comment

Comments E: Specific industry sectors, for example dairy products, horticulture, etc. (recommended by ANZFA and currently part of RABQSA auditor scopes/industry groups)?

Must Include

Government
• Auditors should only be approved to audit food industry sectors for which they have specific experience.

Industry
• None of the options really suit on-farm QA programs like the Australian Pork Industry Quality Program (APIQ). There should be a separate category for on-farm food safety auditors as on-farm food safety issues differ greatly from the rest of the supply chain, especially livestock, where biological contamination (main focus for the rest of the supply chain) plays a minor role in comparison to chemical and physical hazards. In addition, on-farm audits normally last only a few hours and are conducted by a sole auditor; enterprises are often in remote areas and in most cases auditing is only a side-line activity for the auditor involved, i.e. a very limited source of income. Food safety auditor criteria and cost (as a result of training requirements and annual registration fees) that are based on full-time auditors in urban areas are not feasible for on-farm auditors. It will result in on-farm certification bodies, like APL, not accepting the system, as we will lose too many auditors and those remaining will pass the cost on to their clients producers) making audits too expensive and hence resulting in a drop out of program members. Keep in mind that most on-farm programs are voluntary.

Food Safety Auditors
• The processes and risks attached to each of these sectors are quite unique so it is therefore important to classify different industry sectors.

Desirable Only

Government
• Demonstrates appreciation of the context in which the food business operates
• Subject to being able to have a technical specialist available for assistance. Industry
The use of subcategories in industry sectors should be restricted to those that have special requirements based on demonstrated high risk food safety concerns or those that depend on technical processes to manage high risk food safety concerns.

**Do not include**

**Government**
- SFQ believe that the classification of regulatory food safety auditors should be based on the competency of the auditor (that they meet the highest competency to audit high, medium and low risk activities), the technical skills of the auditor and what activity they are auditing. The issue of which specific industry sector the business operates in should not be relevant as the food safety hazards in any high risk activity would be similar and likewise the food safety hazards in a low risk activity would be similar.

**Industry**
- Nil comment

**Food Safety Auditors**
- Auditor competencies should not be aligned to industry sectors but rather the risk of business that is being audited, i.e., high, medium and low. Therefore, the split should be by risk and not industry sector.

**Comments F: Industry sector technical process knowledge, that is, knowledge of particular industry technical processes (excluding the high-risk processes discussed above) in low- and medium-risk food businesses?**

**Must Include**

**Government**
- Knowledge of particular industry and process necessary to determine whether safety plan is adequate to prevent hazard. Industry need to have high level technical understanding. I feel Medium/High risk auditors need minimum tertiary qualifications at Cert IV Food Tech/Microbiology or equivalent.
- The highly technical and therefore difficult to audit processes that are relevant to the primary industry and manufacturing sectors for which auditor certification is sought.

**Food Safety Auditors**
- Nil comment.

**Desirable Only**

**Government**
- We are trying to simplify the system. Therefore, whilst having specific technical skills is desirable, as a minimum, auditors should have acquired the generic competencies in order to audit particular business risk classifications.

**Industry**
- Less necessary for lower risk businesses; would expect auditors with less experience to conduct these audits.
• Most auditors would be capable of conducting an audit at a commercial bakery (pies /quiches etc.) without needing to be a qualified baker or pastry chef.

Industry and Food Safety Auditors (one representative from each repeated the following comment)
• It would be desirable that the auditor has a working knowledge of the particular business that is being audited and their specific technical processes on the protection of food from physical, microbial and chemical hazards are dependent.

Do not include

Government
• SFQ re-emphasizes that regulatory food safety auditors should meet the highest level of competency and technical skills criteria to audit across industry sectors. The question arises as to how new food safety auditors enter into the system and this would be achieved through "on the job" training to meet the competency and technical skills criteria.

Industry
• Given that it relates to lower risk businesses, knowledge of these technical processes should already be held for auditors of higher risk businesses.

Food Safety Auditors
• Nil comment.

Comments G: Length of auditing experience, for example Provisional Food Safety Auditor, Food Safety Auditor, Principal Food Safety Auditor? (currently part of RABQSA auditor categories)

Must Include

Government
• Length of experience will affect competence. Different levels will also assist with mentoring.
• This may be useful as a safe guard in the approval process, e.g. experience before moving from 'provisional' to 'food safety auditor' status. It may be useful to consider the nature of audits and types of businesses/ processes when considering 'experience' as a limiting factor.
• The requirement here is not for 'length' relative to time, that is, time does not make an auditor competent it is the number of audits and the type of audits. Experience at the lower levels could be a prerequisite of the higher levels but not based on time based on quantity and quality of audit experience.
• Allows the development of sector-specific knowledge in low - medium risk food businesses and does not unduly limit the availability of auditors to particular sectors.

Industry
• Nil comment.

Desirable Only

Government
Technical competencies should be the guiding criteria for auditors, experience while valuable, is not sufficient if not coupled with a technical competency.

Experience is important but should focus on currency and competency. Industry

Whilst experience is important, having the right auditor in the right role is far more critical. Food Safety Auditors

Nil comment.

**Do not include**

Government

The length of auditing experience does not necessarily relate to the skills and knowledge an auditor possesses. Industry Competence is not related to years of experience the categories listed e.g. "principal F.S.A." require specific competencies not a specific number of audits or years.

Competency is a finite concept. If an auditor is competent or not - the competency profile must be sufficiently defined to enable a clear assessment of auditor competency. The assessment of competency must have a life-span (as distinct from competency assessment in the training system). Businesses must be able to be confident that an assessment made by an auditor is correct. Businesses have their commercial success riding on the outcomes of audits and should not have to have these decisions placed in question by 'trainee' or 'provisional' auditors who may not have the full skill set required.

Food Safety Auditors

Nil comment.

Comments H: Experience auditing in teams, for example audit team member, solo auditor, team leader? (currently part of RABQSA auditor categories)

**Must Include**

Government

Nil comment.

Industry

If the length of experience is linked with competency requirements it should make no difference whether they audit solo, in pairs or in a large team.

Food Safety Auditors

Nil comment.

**Desirable Only**

Government

Nil comment.

Industry

Only important where team audit is required; expect team audits are used to train less experienced auditors. Food Safety Auditors
• The majority of small businesses would not require a team (only lead auditors would require experience.)

Do not include
Government
• While it would be desirable for industry auditors, it would be restrictive for enforcement agencies who conduct audits. The skills and knowledge required to lead an audit are not necessarily specific to the skills required to audit a food businesses, e.g. leadership skills. We are of the view that specific criteria do not need to be included in the classification and approval of food safety auditors. If not included, auditing experience can still be used as the basis for employing or contracting food safety auditors. In relation to leading audits, enforcement agencies and auditing businesses can consider factors such as experience without relying on approval mechanisms.

Industry
• An auditor who is competent to conduct an audit of relevant processes and industries should be able to do all audit types. Food Safety Auditors
• Nil comment.

Comments I: Scope of audit, that is, systems audits and compliance audits? (recommended by the National Food Industry Training Council when developing food safety auditor competency standards)

Must Include
Government
• Needed because differences exist between system audits and regulatory audits.
• Difference in complexities of system and compliance audits
• Under the SA Food Act, there are no approval provisions for Food Safety Programs (FSP).
• Different skills are required for systems and compliance audits and some regulators would like the flexibility of asking for either systems or compliance audits to be conducted.

Industry
• Scope is a huge issue given the implementation of food safety plan requirements using a template system in some jurisdictions (Victoria)
  - In cases where a business has implemented a Food Safety Plan using a template that has been approved through some process, it is only valid to assess the businesses compliance with the template. There is some question whether this sort of check should be called an audit at all, however, what is clear is that the template should not be reassessed every time an individual business is ‘audited’. It is suggested that the compliance check methodology, used in Victoria, be enshrined in the framework for businesses in this jurisdiction, and others that use templates as the basis for implementing Food Safety Plans.
• Expectations/requirements vary with type of audit
• This should help to establish clear demarcation between audit types (i.e.: what each audit is looking for)
• The scope of the audit required (i.e. is it a verification/monitoring audit or a full systems audit), needs to be clearly understood and communicated before the auditor selection process can begin. The products & processes covered in the audit also need to be clearly
defined. Regulators may like to consider a complimentary project to encourage a more uniform method of conducting and reporting of audits, so that industry can compare apples with apples when looking at audit reports.

Food Safety Auditors
- This should help to establish clear demarcation between audit types (i.e.: what each audit is looking for.)
- Criteria need to be in place. Different skills needed for various types of audits. Determine whether compliant or system based.
- Should be able to use approved systems & compliance audits specifically designed for a company or a number of companies taking into account their policies & procedures for that organisation
- As stated in the discussion paper, they need to be uniform, clear, simple and practical to audit and implement.
- Differing qualifications and experience are required for the 2 types of audit, with the system audit requiring a higher level of competence

Desirable Only
Government
- All food safety auditors must be able to competently perform all audits.

Industry
- Auditor should have knowledge of both.
- Will this type of audit replace the section of auditing carried out by the Accreditation Agencies for vulnerable populations? If not these auditors should be trained and have the same qualifications as the food safety auditor otherwise there will be 2 standards.

Food Safety Auditors
- Nil comments

Do not include
Government
- All regulatory auditors at complex and general level must be capable of conducting systems audits. Only level auditors would conduct compliance audits
- Food safety auditors should have compliance and systems auditing skills within the food business risk classification and be able to identify food safety hazards, not included in a food businesses food safety program, and be able to initiate the appropriate response, e.g., enforcement action and review of the food safety program. If some auditors only have the skills to conduct compliance audits, it increases the risk that major food safety hazards will not be identified during an audit, giving rise to compliance and public health issues. Inclusion of systems and compliance categories of auditors would further complicate food safety auditor approval requirements and processes.
- Auditor should be competent to fully audit against the system and food safety program requirements pertaining to the risk classification
- If local government auditors are approved FSP's, surely they must be able to audit them.

Industry
- An auditor who is competent to conduct an audit of relevant processes and industries should be able to do all audit types.
- Do not include - makes system overly complicated

Food Safety Auditors
• The AFGC does not support further classification based on scope as this will tied to both the experience of the individual auditor and the business sector that is being audited.
• In tandem with high, medium and low risk audits, there is a need for the auditor to be able to assess the Food Safety Program for risks to ensure that the exact scope is covered

Comments J: Other (please describe and provide reasons)
Must Include
Government
• Regulatory food safety auditors will need to be approved against the relevant legislation
Industry
• Specific industry experience. For example to audit a fish business the auditor must have fish industry knowledge. The competency must be validated, not self declared.
• Consideration should also be given to the 'style' of auditing - e.g. outcome based auditing as opposed to assessment of strict compliance to prescriptive requirements - or a combination of both.
• In Summary: The framework must acknowledge that there are, in effect, three different types of assessments that may be undertaken at this stage. They are an inspection, a compliance check and an audit. Regulators must balance their investment in implementation such that individuals visiting businesses have all of the appropriate skills and knowledge to undertake the type of assessment required yet do not over- invest and attempt to pass on additional charges to business.

Food Safety Auditors
• The NSW Food Authority would not consider auditors who do not have the ability to assess food safety programs and systems for adequacy as a food safety auditor. This is a significant issue for regulatory auditors who must be able to both simultaneously and report regulatory non-compliance. General support is provided for the Auditing Management Framework as proposed. It is noted that the proposed framework is to be limited to regulatory food safety audits in the health and primary industry portfolios and the work is a precursor to the consideration of developing existing and any proposed commercial industry frameworks to achieve equivalence with legislative food safety outcomes. If the latter could be achieved as soon as practically possible, this would be a major step forward and help to achieve improvement in auditing systems in Australia. As indicated in the paper, this was an issue raised in the 1997-98 Blair Review.

Industry and Food Safety Auditors: (one representative from each repeated the following comment)
• Overall there is concern that the system of classification could result in a process of categorisation and sub-categorisation which results in the available number of qualified auditors becoming far smaller and more difficult to obtain.

Desirable Only
Government
• Nil comment
Industry
Nil comment

Food Safety Auditors

Environmental Health Officers may significantly contribute to the auditor workforce as their training and experience provides them with an extensive understanding of food science, food safety and microbiology.
Issue 2: Structuring grades of auditors

Provide suggestions on the best way to structure or organise the various elements of the auditor categories you have selected in Issue 1 into a useful national system.

Government respondents listed; experience, competencies, risk based (high, medium and low), industry sectors and education. Comments included:

- The grades of food safety auditor should be based on the recommendations of the National Food Safety Auditor Competency Project and incorporate the recently endorsed national units of competency for food safety auditors.
- Auditors should be categorised by the industry sectors for which they have the competencies to audit. Where an industry sector contains a high risk component, auditors should also be able to audit this area.
- The most important criteria is possession of general educational qualifications as a minimum, but more importantly, aptitude for the job of auditing that can be built upon by training based on competency standards.
- Three levels of auditors based on business risk (high, medium and low.)

Industry respondents listed; risk based (high, medium and low), experience, food process chain, industry sectors, education. Comments included:

- For each risk level of audit being conducted (high, med, low), there be list of processes appropriate to that risk level (pasteurisation, retort, etc.). For each process, there may be a number of criteria the auditor must demonstrate capability to audit against.
- Classification to an industry sector with additional permissions within an industry sector based on whether a specific industry sector has special business and process knowledge requirements.
- In addition to structuring various grades of auditor based on experience, it would also be useful to structure the categories according to elements of the food process chain (i.e. production; processing; preparation; sale/service)
- Medium and High Risk also require minimum tertiary qualifications in Food Tech/microbiology or equivalent.

Food Safety Auditor respondents listed; education, experience, risk based (low, medium and high), monitoring. Comments included:

- Have the same system in every State and work out the hierarchy of auditors based on the most important requirements e.g.: 1: must have tertiary education 2: must have experience in auditing 3: must have specific industry experience 4: must undertake further training as part of a continuous professional development program.
- Auditor competencies should be split into low, medium and high risk categories in line with low, medium and high risk processes identified in the food industry.
- I would agree with the categories as stated in the discussion paper. However, there would need to be one senior category or enforcement agency to monitor and possibly coordinate auditors.
### Issue 3: Criteria for approving auditors

What types of requirements should be used to assess whether someone is a competent regulatory food safety auditor?

<table>
<thead>
<tr>
<th>Requirements</th>
<th>Industry</th>
<th>FSA</th>
<th>Govt</th>
<th>Total</th>
</tr>
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<tbody>
<tr>
<td>(a) General education, for example high school certificate</td>
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<td>6</td>
<td>6</td>
<td>18</td>
</tr>
<tr>
<td>(b) Higher education, for example university degree</td>
<td>8</td>
<td>9</td>
<td>11</td>
<td>28</td>
</tr>
<tr>
<td>(c) Training qualifications based on competency standards (that is, training packages)</td>
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<td>9</td>
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<td>38</td>
</tr>
<tr>
<td>(d) Industry experience</td>
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<td>10</td>
<td>10</td>
<td>37</td>
</tr>
<tr>
<td>(e) Auditing experience</td>
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<td>13</td>
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<td>(f) References</td>
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<td>7</td>
<td>6</td>
<td>20</td>
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<tr>
<td>(g) Membership of an appropriate professional body</td>
<td>4</td>
<td>6</td>
<td>6</td>
<td>16</td>
</tr>
<tr>
<td>(h) Understanding of relevant legislation</td>
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<td>10</td>
<td>4</td>
<td>31</td>
</tr>
<tr>
<td>(i) Professional conduct and suitability (for example criminal checks)</td>
<td>14</td>
<td>10</td>
<td>13</td>
<td>37</td>
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<tr>
<td>(j) Literacy in English</td>
<td>15</td>
<td>11</td>
<td>14</td>
<td>40</td>
</tr>
<tr>
<td>(k) A code of conduct signed by the applicant</td>
<td>13</td>
<td>10</td>
<td>8</td>
<td>31</td>
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<tr>
<td>(l) Personal attributes check</td>
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</tr>
<tr>
<td>(m) Other</td>
<td>1</td>
<td>2</td>
<td>4</td>
<td>7</td>
</tr>
</tbody>
</table>

### (m) Other:

**Government:**
- Ability to drive
- Food safety knowledge
- No provisions in Discussion Document to manage conflict of interest and other systems an audit organisation should have in place - staff training, peer review, competence of auditors etc.
- Requirements for provisional auditor to initially work under supervision of food safety auditor

**Food Safety Auditors:**
- Details of previous approval by another authority should be provided.
- Qualifications in higher education including as a minimum topics of food science, food safety and microbiology.
- Communication skills (both verbal and written)

**Industry:**
- All the criteria listed are desirable but not all critical
Top five recommended inclusions:
1. Literacy in English
2. Training qualifications based on competency standards (that is, training packages)
3. Industry experience
4. Auditing experience
5. Professional conduct and suitability (for example criminal checks)

Note: Recommendations 3-5 total scores were an equal amount.
Issue 4: How should governments evaluate the suitability of food safety auditors?

4a): In relation to the regulatory approval of food safety auditors, which bodies are most appropriate to evaluate those requirements that regulators can delegate to other organisations?

### First Preference

<table>
<thead>
<tr>
<th>Bodies</th>
<th>Industry</th>
<th>FSA</th>
<th>Govt</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>(i) Food regulators</td>
<td>0</td>
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<td>5</td>
<td>10</td>
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<tr>
<td>(ii) Industry-focused personnel certification bodies, for example</td>
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<td>5</td>
<td>4</td>
<td>16</td>
</tr>
<tr>
<td>(iii) A new JAS-ANZ accredited personnel certification body created (or endorsed) for regulatory purposes</td>
<td>4</td>
<td>1</td>
<td>5</td>
<td>10</td>
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<tr>
<td>(iv) Accredited certification bodies</td>
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<td>2</td>
<td>7</td>
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</table>

### Second Preference

<table>
<thead>
<tr>
<th>Bodies</th>
<th>Industry</th>
<th>FSA</th>
<th>Govt</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>(i) Food regulators</td>
<td>1</td>
<td>3</td>
<td>5</td>
<td>9</td>
</tr>
<tr>
<td>(ii) Industry-focused personnel certification bodies, for example RABQSA</td>
<td>5</td>
<td>0</td>
<td>2</td>
<td>7</td>
</tr>
<tr>
<td>(iii) A new JAS-ANZ accredited personnel certification body created (or endorsed) for regulatory purposes</td>
<td>8</td>
<td>5</td>
<td>5</td>
<td>18</td>
</tr>
<tr>
<td>(iv) Accredited certification bodies</td>
<td>1</td>
<td>3</td>
<td>4</td>
<td>8</td>
</tr>
</tbody>
</table>

**Industry comments:**
- The goal appears to be to achieve accreditation similar to other industries (i.e. CPA's). Disadvantages appear to be manageable.
- Already working in NZ. Consistent with clearly defined roles and responsibilities.
- Accreditation needs to be conducted independently, allowing the regulators to simply approve on the basis of the third party.
• There are many sunk-costs in the establishment and operation of the existing bodies. Therefore these should be utilised as much as possible rather than creating an entirely new body
• Witnessing of auditing skills in ALL industries and sectors for which approval is sought. This is the ONLY form of assessment that is effective
• One system not open for misinterpretation. Internal evaluation does not always work.
• Not sure what the difference between (ii) and (iii) is i.e. what would that achieve except add cost that would be passed on to industry and/or consumers.
• Definitely not option iii) as there is enough audit duplication already
• The only bodies that should be able to evaluate the suitability of food safety auditors are (ii) industry focussed personnel certification bodies. At present RABQSA is the only body in Australia accredited to ISO 17024:2003 (and available) to provide this service. We have selected (iii) as our second choice however we understand that Australia probably does not have a sufficient number of FSA's to warrant more than one personnel certification body, and also the resources required to set up another similar body would be considerable. Food regulators are currently responsible for the competence of their regulatory auditors but we believe that this is part of the problem (as they are not experts in this field), and furthermore this is not their role. In our opinion, Federal, State & local government bodies should all be subject to the same accreditation requirements as certifying bodies
• Food safety must be government legislated and enforced and not set-up through bodies without legal power, or by local shires
• Must be industry focused
• No particular preference as long as they can provide the service in a cost effective way. If the evaluation is conducted by private companies, more than one option available to auditors would beneficial to ensure competition.
• Independent certification bodies are best placed to make this assessment

Food Safety Auditors comments:
• This question is unclear as to whether "food regulators" include Local government
• Reduce costs- no or reduced accreditation fee. Each State looks after their appropriate area but still recognised nationally. Need confidence that regulators have input into outcome. A combination of food regulators and JAS-ANZ desirable
• Two possibilities: expand the RABQSA's power to include, or use an approved accreditation certification body. This could be also secured under legislative requirements
• Food regulators ultimately have legal responsibility for the integrity of the audit system
• Advantages of using RABQSA or similar personnel certification bodies are: already established and have well developed infrastructure and operating systems; can apply relevant AS and ISO standards; able to be nationally consistent and independent; permits international certification.
• The least favoured option is where each Food Regulator independently establishes their own system as it will result in a lack of national uniformity and will fail to ensure that industry and auditors are treated equally based on their skills, knowledge and expertise
• Higher level of accountability with a government sponsored certification body.
• An approval system operated by food regulators could also work effectively provided mutual recognition existed between the jurisdictions

Government comments
• Food regulators would have the best knowledge of what is required to audit particular types of premises within their jurisdiction.

• Regulators require control of the auditor approval process to ensure due diligence is achieved for regulatory compliance auditors. Regulators have ultimate responsibility for auditor approvals and appeals can be made against the regulators decision 1, 2 - independence and national uniformity. 3 – has increased potential for inconsistency (though could be alleviated with nationally agreed criteria). 4 - added cost to the system

• There are too many fingers in the pie already. We don't need a new breed of self-appointed "experts" getting stuck in as well.

• SFQ believe that a single national body that carries out the assessment of food safety auditors and makes recommendations to the regulatory body is the preferred option. Regulators, industry and consumers need confidence in this system. If confidence, through national consistency of approach is unable to be reached then food regulators are the second option

• There are some concerns about the subjectivity of auditors approved by an industry specific certification body e.g. a dairy auditor approved by a dairy certification body. To control costs and ensure an adequate supply of auditors food regulators should be able to approve food safety auditors to conduct specific regulatory audits e.g. Dept of Health could approve EHOs to undertake audits of vulnerable pops and catering but they would not be able to operate beyond this scope unless certified by certification body

• Option (iv) has incorrect terminology - should be accreditation bodies. Option 4 in the Discussion Document does not describe the New Zealand framework and is full of inaccuracies. NZFSA's comments were not included in the document before release. The advantages and disadvantages are also not correct. From a regulatory perspective the proposed framework does not appear to consider how a regulator has input or oversight of the auditor assessment process. It is unclear how regulatory requirements can be assessed and there may be another layer of duplication imposed.

• Would prefer to only use auditors who can also be recognised to audit industry proprietary systems, to reduce multiplicity of audits between regulators and regulatory systems and this can be best achieved by having auditors that are recognised by regulators and industry.

• (i) Food regulators are not necessarily competent to assess personnel. (ii) RABQSA has an industry focused Scheme Committee with regulatory and commercial representation. (iii) Why create a new body? (iv) Accredited certification bodies suitable as well

• Accredited certification bodies should be able to assess competencies including field experience. Food regulators should hold the responsibility for the assessment of personal information checks. Accredited certification bodies advantages outweigh disadvantages.
4b): If all food regulators adopt the same criteria for evaluating food safety auditors, is it critical for all food regulators to use the same types of bodies to evaluate those requirements they do not have to directly evaluate themselves? That is, is a single system required to achieve nationally consistent outcomes?

<table>
<thead>
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<td><strong>26</strong></td>
<td><strong>10</strong></td>
<td><strong>5</strong></td>
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</table>

**Industry comments:**
- National consistency is desirable and important for food safety auditing.
- The main aim is to achieve a nationally consistent outcome, therefore it seems obvious that regulators should be required to adopt the same criteria.
- The Certification Body/s can act as a 'screen' for applicants applying for certification with the Regulatory Authority.
- As long as the certification bodies are applying the same criteria it doesn’t matter, and as a minimum they should comply with relevant Australian Standards and ISO Standards. However, in reality it is unlikely that there will be sufficient number of auditors to support more than a couple of evaluating bodies.
- It must recognise the needs of industry sectors and specialists.

**Food Safety Auditor comments:**
- National consistency is desirable and important for food safety auditing.
- A single system will ensure consistency of approach and a higher level of accountability and also reduce the inefficiency associated with multiple systems.
- This is desirable but not essential. Allows states to have their own system and the mutual recognition laws need to be addressed at this stage.
- It is not necessary to have one body evaluating criteria. E.g.: food regulators may wish to have an in-house evaluation system for EHO’s and then choose to adopt an industry focused personal certification body like RABQSA for third party auditors. It should be up to the individual auditor to decide which evaluation body to go through as long as each body has been approved by the regulatory body/ FSANZ.
- This should allow for one interpretation of the regulations which would hopefully gain consistency from auditors. However, there would be some elements specific to individual industries.
- As long as the certification bodies are applying the same criteria it doesn’t matter, and as a minimum they should comply with relevant AS and ISO Standards. However, in reality it is unlikely that there will be sufficient number of auditors to support more than a couple of evaluating bodies.
- Legislation is national and should receive a national approach.

**Government comments:**
- National consistency is desirable and important for food safety auditing.
- If the criteria for evaluating food safety auditors are clearly outlined, the evaluation process should be consistent. This same situation would exist where two or more service providers operated within the same types of bodies.
- Not necessarily because information can come from one or a number of the above options.
Even by adopting criteria, implementation is not always consistent. A single body may improve cost efficiency.

The criteria are the important common element, provided the criteria are assessed in a consistent manner. Varying types of bodies may conduct the assessment, as long as it is to the same standards.

SFQ believes that one body is utilised and one set of nationally consistent criteria. SFQ is critical of a system that uses a body that has a remit wider than the regulatory system (i.e. quality), due to commercial vested interest reasons. The body has to be independent and able to demonstrate that good public policy is being maintained.

As long as the criteria are consistent the organisation that undertakes the work is not critical.

Introducing a personnel certification body (PCB) into the proposed auditor framework is introducing another layer with additional cost and resource required. Use of one PCB does not allow for competition. However, if this framework is adopted then NZFSA supports inclusion of other PCB’s
4c): Should some classes of food safety auditors be able to apply directly to food regulators for approval as regulatory food safety auditors, for example government enforcement officers who will not audit for quality purposes?

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<td><strong>Total</strong></td>
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</table>

**Industry comments:**
- Maintain consistency based on audit scope rather than accrediting body.
- Consistency is vital - one system should apply to everybody, across all government and non-government auditors.
- The Regulatory Authority should be able to determine approval processes
- There are currently gaps between commercial and regulatory auditors. This process needs to address this issue.
- A consistent system should not provide the opportunity for quasi-autonomous bodies (whether govt or other) to do their own operating guidelines and systems. The purpose of implementing quality control over the auditing process would be defeated by this provision
- Only if the regulator is 15017024 compliant, otherwise consistency and fairness is impossible. Government enforcement officers still need to demonstrate competence in food safety audit.
- This will create a divided system and potentially result in the perception that government enforcement officers are an “inferior class” of auditor. Government officers should be able to demonstrate the same levels of competency as non-government auditors through an independent organisation as this will also enable officers to more easily move between jurisdictions and still retain certification as an auditor.
- They should all have to apply through a single regulatory body and should be auditing for quality at the same time
- This would defeat the purpose of trying to achieve a nationally consistent outcome
- Can be abused.
- Sounds preferable to cut out the red tape.

**Food Safety Auditor comments:**
- Single systems would provide clarity, and uniformity amongst regulators, and potentially avoid ambiguity. Many EHO’s are well versed in low- medium risk food businesses for their areas.
- They should be approved by food regulators. To reduce costs and avoid unnecessary paperwork for approvals. Will be necessary to meet the demand of auditors required. Government regulatory officers currently have the skills and competence to deal with compliance issues pertaining to food safety.
- If the auditor can demonstrate their competency & show a history of food safety auditing then I believe that they could be take the place of current government enforcement officers
- The Quality component would need to be included in sectors where accreditation, certification or quality standards exist as part of the industry sector. There needs to be a move for Accreditation Agencies e.g. Australian Council of Healthcare
Standards, also include a greater part of the food safety compliance requirements into their standards.

- The individual government agency is responsible for training their own staff and hence should be allowed to appoint regulatory food safety auditors. Government auditors would be mostly utilised for verification and enforcement activities which means they will require different skills to those auditors who audit for quality purposes.
- As government enforcement officers have additional roles beyond just auditing FSPs (including accrediting FSPs and taking legal action), it is reasonable for there to be a separate system, if desired by the regulatory agency, to approve government enforcement officers. In this case their approval would also allow them to undertake 3rd party audits across all jurisdictions.

**Government comments:**

- Not to be limited to Regulatory. Accreditation of all food safety auditors should not be limited.
- Local Government enforcement officers require specific qualifications to regulate food and their training is very broad and in-depth in food safety roles. This would be an advantage over other auditors.
- These types of officers/auditors must satisfy certain selection criteria to be employed in government. If they were in local government, and applying to a State government agency for approval, much if not all of the criteria would probably be able to be ascertained by the State agency.
- It is permitted in State legislation
- Many regulators will only want to audit for regulatory purposes while performing duties for their employer. They may not want to make themselves available to the 'open market'. These groups should not be forced to comply with requirements which apply to auditing quality systems which fall outside legislated requirements.
- I wouldn't exclude auditors for quality purposes. I can't see a practical difference between the two.
- This is self-evident
- Regulators can and need to be able to approve all classes of food safety auditors for the purposes of regulatory food safety audits as specified within legislative requirements. An internal management system should be in place to ensure regulatory officers have the appropriate auditing skills and knowledge.
- To ensure sufficient numbers and reduce costs and to encourage EHOs to become auditors.
- There may be some regulatory functions that may not be able to be delegated to approved/recognised auditors e.g. because of market access or legislative requirements including the need to enable regulatory powers
- There should be scope for regulatory-only auditors; however this is not a matter currently being considered by DHS.
- Certified competent food safety auditors should be able to apply for any food safety auditor position, but regulatory requirements may be additional to their current competencies.
- Impact on food regulators & ability of food regulatory officers to approve auditors will need to be further assessed.
Issue 5: Maintaining competence

5a): How can approved food safety auditors demonstrate that they continue to be competent and have remained up to date with changes to legislation and industry practices?

Government comments:
- Minimum threshold of numbers of audits conducted. Assessments, both written and practical (audit to auditor). Proof of ongoing training i.e. legislation training.
- Meetings or training attended to assist in maintaining competencies, proof of membership to an appropriate professional body that would assist in updating skills and knowledge.
- Regular retesting of knowledge competencies
- Performance based assessment system

Industry comments:
- Annual or bi annual recertification training/ testing.
- Use the RABQSA process.
- The Auditor needs to conduct a minimum number of audits of facilities for which they are certified and verified by the regulator having received the reports.
- Witnessed audits by a person who could cover all aspects would be ideal to keep it cost effective. To keep the cost down, online assessment for all auditors with witnessed audits for a randomly chosen sample might be something to consider.
- Verified continuous professional development. Mandatory attendance of workshops.
- Evidence of training and examinations, customer feedback on the auditor’s performance.
- Proof of continual industry work experience, regular net based auditor questionnaire, every 5 years has to re-apply for certification, certification given to individuals not organisations.
- Competency based training plus refresher training, Complaints process and review in case of breaches

Food Safety Auditor comments:
- Knowledge and skill examination on a regular basis.
- Required number of audits preformed/ time period. Competency refresher/ units up to date.
- Automatic recertification should be required when there are any significant changes to legislation. This can be achieved through training course/ workshop attendance, adopting a register of certified individuals or putting in place a system whereby reaccreditation is allowed provided the individual can demonstrate that they have earned enough training points over a particular time period e.g. use indicators such as number of inspections, participation in training, membership in professional society.
- Have a refresher training every 1-2 years on audit and food safety topics provided by State Governments. Enter into certified audited practitioner’s scheme- similar to continual professional development in environmental health.
- Approved food safety auditors must demonstrate that they have had continuing work experience in the field of food safety auditing and have undertaken some professional development.
Competency assessment checks conducted by the regulatory body. To achieve this, auditors could do biannual training and recertification against the standards which would need to be declared to the business that were being audited.

**5b): How can food regulators manage this?**

**Government comments:**
- Need to set up a specific section of government (body) to monitor and maintain competency standards etc.
- Issue auditors with a logbook, periodically request logbook for checking
- Via a personal certification body keeping the regulator informed of recertification of auditors
- Through a check audit system, that validates an auditor's performance.
- Evaluating on-going professional development. Monitoring and managing complaints about food safety auditors. Monitoring audit reports
- Code of conduct and national committee.
- Include in the conditions of approval

**Industry comments:**
- Continuing education requirements; 'auditing the auditors'
- This should be outsourced with the original certification process.
- The system needs to be simple and require the minimum of resources. There needs to be a compulsory element with the ability for the regulator to take punitive action.
- Make it a requirement that food safety auditors must be eligible for grading by RABQSA.
- Auditor professional development logs and Audit logs describing the amount of audits and type of audits conducted. Reviewing of these to be by certification panel.
- Net based, single regulatory body
- Food regulatory bodies should also be accredited as certifying bodies by JASANZ
- Regulators are part of accreditation panel

**Food Safety Auditor comments:**
- Mandatory expiry date on auditor's approval. Need to set up a specific section of government which is sufficiently resourced to monitor and maintain competency standards of auditors.
- Via certification body.
- Food regulators must conduct periodic reviews as part of the auditor approval renewal process. Regulators could also develop their own verification programs that would randomly target approved auditors and assess their performance in the field.
- Make it a condition of registration/ accreditation.
- By having all auditors pay a yearly registration fee & renewal depends of attending refresher course.
- Certification bodies should be responsible for providing further training required by the auditors that are accrediting as this will ensure all auditors are being trained to the same consistent standards. Food regulators can manage this via employment of a central register that is updated and available on-line.
5c): How often should food safety auditors need to demonstrate that they are remaining up to date and competent?

<table>
<thead>
<tr>
<th>Frequency</th>
<th>Industry</th>
<th>FSA</th>
<th>Govt</th>
<th>Total</th>
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</thead>
<tbody>
<tr>
<td>1 year</td>
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<td>2 years</td>
<td>10</td>
<td>5</td>
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<td>21</td>
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<tr>
<td>3 years</td>
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<td>3</td>
<td>3</td>
<td>11</td>
</tr>
<tr>
<td>4 years</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>5 years</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

**Government comments:**
- If it's too often it could add to cost, if it's too infrequent there's a risk that skills and knowledge are not adequately maintained, e.g. Australia develops/ changes standards, auditors should be required to demonstrate knowledge of changes where they are relevant to auditors’ classification.
- The system should not be too onerous for auditors and not significantly contribute to pushing costs up. There may be different competency requirements for different levels of auditors.
- Should be performance based and also linked to business risk classification. Auditors need to have current practice and be reviewed.

**Industry comments:**
- Industry requirements are changing rapidly; auditor skills need to keep abreast of them.
- It may be a staged approach. Auditor hours and customer feedback should be assessed every year, however additional training and personal development maybe better assessed every two to three years.
- Although the simplest system would be an annual requirement in association with an annually renewable registration fee, it may not be possible to provide evidence of comprehensive auditing across all categories for which an auditor is approved within one year. Furthermore, the burden of keeping records and filling reports every year to maintain the current level of approval is excessive. Consideration also needs to be given to level of evidence required for an auditor to upgrade their registration.
- Another equally relevant consideration is the process used by jurisdictions to initiate the removal of approval for an auditor. It is essential that de-registration also provide processes for appeal and administrative review and compensation for wrongful de-registration.

**Food Safety Auditor comments:**
- The food safety auditor should be reregistered or accredited at least once every 2-3 years. The actual timing is not critical however this process should be linked to the annual submissions of documentation showing competencies have been met for instance training attended, hours of auditing, number of audits etc. Competency is reaffirmed after refresher training every 1-2 years.
- By having the updates carried out every two years gives some degree of onus on auditors to keep themselves updated because they know they are due for assessment.
Issue 6: Code of conduct

6a): Should food regulators have a nationally consistent code of conduct for approved food safety auditors?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>44</td>
<td>0</td>
</tr>
</tbody>
</table>

Government comments:

- Everyone is treated the same and has to abide by the same rules. This would be necessary if the auditor was to cross State boundaries.
- A national code of conduct would assist regulators in dealing with auditors subject to misconduct in different States and Territories in a nationally consistent manner. It would also make requirements less confusing for auditors that work for different jurisdictions. Increased consistency from a Code of Conduct may also facilitate national consistency in any disciplinary action.
- Part of the Code should be that auditors will only audit in situations where they are competent.
- Inconsistency between jurisdictions is the main criticism by industry. A consistent code of conduct between jurisdictions would not only remove this criticism but make it easier to have information shared between jurisdictions should an auditor be either put on probation or have their approval revoked/suspended for breach of the code.

Industry comments:

- Common for professional organisations - lends credibility.
- Codes should focus on flexibility and the ability of auditors to deal with their ‘customers’ – businesses. The development of the code will need to have significant industry input and allow for a review process.
- One system means that auditors who have had issues registered and disciplinary action will be transparent across all regulators.
- We strongly endorse this as a minimum effective control of industry and local government EHO-auditors to ensure that a high standard of professional conduct is maintained. The Code needs deal with conflict of interest where auditors may have direct or indirect financial gain from a company. The Code needs to be publicly available, with advice on how to register a complaint about an auditor’s failure to comply with the COP. In development ensure that industry has significant input and that the professional associations support the Code. It needs to be regularly updated and reviewed. This would suggest that the best place for the COP to be located is on the website of professional association and that the professional association is responsible for its development and ongoing maintenance, in consultation with the jurisdictions. If the condition of registration is that the auditor agrees to abide by the COP, this may provide a mechanism for taking immediate punitive action against an auditor that has been found to significantly breach the code.
Food Safety Auditor comments:

- Will assist auditors who work in various states and industries. Should have it as a condition of approval for a food safety auditor.
- Auditors should abide to a code of conduct; however it is not essential that this code of conduct is nationally consistent.
- Given that we are trying to develop a national audit framework, it is imperative that any code of conduct for approved auditors needs to be nationally consistent.
Issue 7: Food Safety Auditor Registers

7a): Given that each Australian food regulator must maintain a publicly available register of food safety auditors they have approved, is a national register necessary?

<table>
<thead>
<tr>
<th>Bodies</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industry</td>
<td>14</td>
<td>3</td>
</tr>
<tr>
<td>Food Safety Auditors</td>
<td>8</td>
<td>4</td>
</tr>
<tr>
<td>Government</td>
<td>6</td>
<td>7</td>
</tr>
<tr>
<td>Total</td>
<td>28</td>
<td>14</td>
</tr>
</tbody>
</table>

Government comments:
- Improve access to all food safety auditors.
- Creates an administrative burden to update a National Register. If the public register is made available on the food regulator's website, and is linked to other food regulator sites, it should not be necessary to have a National register.
- A national register is not essential but would have some benefits. We would support option b (i) concept where there is a central web site with links to each regulatory agencies approved auditors where they need to be available for the public or other jurisdictions.
- A national register would likely reduce administration costs, enhance opportunities for auditors across State boundaries and limit the ability for suspended auditors to continue practicing interstate.
- It may be convenient for national multi-state food businesses but it may slow the updating of the register and administrative protocols would need to be developed.

Industry comments:
- Interstate transfers or national companies that require consistency for auditing complex systems.
- May not be clear which regulator/department approves the auditor. National register may be easier to locate an auditor.
- A national register is necessary because: It enables mutual recognition of 3rd party auditors who are engaged by a company that has operations around Australia to conduct audits in all of their facilities; It enables jurisdictions and companies to verify claims by an auditor that they are approved to conduct certain categories of audits; It reduces the costs of duplication for jurisdictions through having to undertake duplicate registrations and having to independently develop and maintain websites.
- Promote national consistency.
- The long-term cost of maintaining an up to date National register would have to be borne by the independent authority. It would only be matter of time before those costs were passed on or charges for access were applied.
- Yes, most companies selecting FSA's, & particularly national companies, want to be able to look at and compare all auditor options (& costs?). There would need to be some distinction on the register between regulatory and non-regulatory FSA's. A national register may also help with availability & travel cost issues by allowing regional companies to select an auditor that already operates in their geographical region.
Food Safety Auditor

- A national register is required only if auditing certificates are accredited nationally i.e.: an auditor from Adelaide would also be entitled to practice in Queensland without requiring re-training.
- To keep uniformity and consistency. Industry sectors tend to be cynical when it comes to regulation authorities espousing consistency of approach. This move should give confidence that we will be treated the same whether we are in NSW or WA.
- It would be great to have a single list of approved food safety auditors however we don't believe that the cost to develop and maintain such a register is warranted. It would be just as useful to have each food regulator link their register via the internet with other food regulators register.

7b): If you answered YES to (a) above, please indicate your preferences about what type of information should be available on a national register

<table>
<thead>
<tr>
<th>Type of information</th>
<th>Industry</th>
<th>FSA</th>
<th>Govt</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>(i) The registers of state, territory and Commonwealth governments do not need to be consolidated provided they can be accessed on the internet from a single website</td>
<td>7</td>
<td>5</td>
<td>6</td>
<td>18</td>
</tr>
<tr>
<td>(ii) It is important that a single list of approved food safety auditors be maintained and available on the internet with tools to search the information in different ways</td>
<td>10</td>
<td>5</td>
<td>3</td>
<td>18</td>
</tr>
<tr>
<td>(iii) It is necessary for a national register to include both food safety auditors approved under legislation and food safety auditors certified by personnel certification bodies, that is, combine or link both government and industry scheme registers.</td>
<td>8</td>
<td>9</td>
<td>2</td>
<td>19</td>
</tr>
</tbody>
</table>

NB: Some respondents indicated more than one preference.
**Government comments:**

- In (i) above, it would ease administrative arrangements while providing the means for businesses that operate in more than one State or Territory to access the information.
- We believe that a register/s is/are desirable and will assist in avoiding cross boarder jumping, duplication of information and other business reasons. However, SFQ believe that a register is simply a tool and not the driver. It is important that the driver - the system underpinning the management of the register, is implemented so that nationally consistent rules, sanctions, notifications and information sharing protocols exist on the basis that natural justice and due care and process is followed. It is recommended that legal advice is sought to determine the best way to manage the issue of natural justice.
- Option 1 is preferred, utilising linkages and searching of websites.

**Industry comments:**

- One register would be appropriate and easier to access.
- A portal to state-based registers.
- All auditors certified as competent should be registered with relevant regulatory body. Should only have one list (kept by FSANZ) of regulatory approved auditors.
- The national register should be similar to the web based JAS-ANZ register of certified organizations.

**Food Safety Auditor comments:**

- There also could be an appropriate body (ombudsman, adjudicator) to refer appeals to.
- In supporting option iii) it is recognised that the national register may not be a single database but rather a single access point which directs the user to multiple databases (individually held by regulatory agencies and personnel certification bodies). It is also important to recognise that some government approved auditors have no desire to undertake anything other than regulatory (2nd party) audits. In this case they should have the option of not being placed on a public register.
Issue 8:  Introducing new requirements and phasing out existing requirements

Provide suggestions on what transitional arrangements could be used to introduce the new food safety auditor approval requirements and phase out existing requirements.

Government comments:
• There should be a 12 month period prior to the FSP requirements being legislated to train new auditors such as Government enforcement officers, and up skill existing auditors. It would not be appropriate to undertake this training during the 2 year phase in for having a FSP as most of these types of premises already have a FSP and could lodge it immediately the FSPs are introduced and there would be insufficient auditors. The auditing framework should be put in place prior to FSPs being required.
• Set a transition or ‘lead in’ period by which time the four NFSAC levels are reflected in State registers of approved auditors.
• This issue should be left up to the individual jurisdictions to determine the most appropriate mechanisms, sensitive to their needs. We also recommend that the periods for transitioning to the new requirements should be standardised.
• Appropriate transition period to allow training and uptake of new requirements. Allow all auditors who meet the medium risk food businesses be approved only during the transition period to carry out high risk. This may potentially cover those that currently meet the old auditor requirements. All licences should only be issued for the transition period with an expiry date on approval. New application required after transition period to ensure all auditors meet new requirements.
• Recognition of prior learning arrangements and provide adequate time for existing auditors to satisfy any new competency requirements. The QSA requirement for provisional auditors to undertake a number a supported audits would need to be relaxed or removed to allow EHOs who may conduct a limited number of audits (e.g. regional areas).

Industry comments:
• Allow a 2 year transition period and on renewal swap over to be recertified under the new arrangements. In the transition stage provide training and information to allow existing auditors to renew.
• Transition period needs to be as short as is reasonable to reduce confusion amongst the industry around changing auditing standards
• Allow a transition period of dual requirements where the old requirements are accepted, allowing time for auditors to be approved under the new requirements.
• Set a firm timetable for transition and require states and territories to produce implementation strategies that reflect their own situation
• Train local people and subsidise travel and travel time.
• Phasing In and Phasing Out are not practical. Industry should not be subjected to an inspection / compliance check or audit by someone who does not have the skills required to undertake the assessment. Introduction of a requirement should only take place when the enforcement arrangements / compliance mechanism is ready. If the system is in transition - the business involved still has their sustainability at stake.
Food Safety Auditors comments:

- Food Safety Auditors are approved under the Act as a person competent to audit relevant class of food businesses. Determine with which Authority Food Safety responsibility lies (it is this Authority that is best placed to approve and accredit Food Safety Auditors and Food Safety Auditing Bodies. Use Local and State governments to promote understanding. Use "mail out", publish a quarterly newsletter. Clearly state in communication exactly how the new system is different from the old, how the system will work and the timeframe. Establish a website with how to seek help, support and advice.

- Allow enough time for training of Environmental Officers. Allow 12 months for new and existing auditors to meet new requirements. Existing auditors be considered on merit/ experience. Existing Environmental Health Officers with experience in inspecting high risk food businesses be approved to audit high and medium risk businesses providing officer is committed to meet new requirements within transition period. Additional training will be necessary for Environmental Health Officers not experienced in inspecting high risk businesses. Allow Environmental Health officers to become automatic level 2 auditors with training/ courses to level 3. Auditor approvals commence prior to the introduction of the phase in period—anyone auditing must be approved but there needs to be flexibility in the initial approval process to take into consideration lack of auditing experience.

- Transitional arrangements need to be considered on a case by case basis. A reasonable period for phasing in the new competencies needs to be developed, most probably in the vicinity of a 5 year period. Other issues that need to be discussed are who is going to provide transitional training.
Issue 9:  Building a competent auditing workforce

9a): Do you have any suggestions on how food regulators can help build the pool of available competent approved food safety auditors?

Government key themes: Training and Other personnel (EHO) Comments included:
- Encourage and provide incentives, including tools such as generic check lists, for Environmental Health Officers within local government to be trained as food safety auditors.
- Train competent food safety auditors in workplace training and assessment, so more assessors are available.

Industry key themes: Training and Other personnel (EHO) Comments included:
- Work with educational institutions to include some aspects of auditing in degree programs, TAFEs, etc.
- Use local government (EHO's)
- A longer term infrastructure strategy should be developed food safety auditing should be seen as a legitimate and attractive career path.

Food Safety Auditors key theme: Training and Other personnel (EHO) Comments included:
- Consider use of other suitably experienced/ qualified personnel.
- Support and training provided to existing Environmental Health Officers.
- Utilising industry based personnel with industry experience and provide the necessary training to ensure they have all competencies required.
- Work with educational institutions to include some aspects of auditing in degree programs, TAFEs. Ensure that universities provide new graduates with the necessary skills and experience to be automatically approved as an auditor following completion of recognised undergraduate degree courses (e.g. those majoring in Environmental Health).

9b): Do you have any suggestions on how food regulators can help build the pool of available competent approved food safety auditors?

Government key themes: Utilise EHOs, Training, Share resources and State sponsored auditors

Comments included:
- Provide on the job training in these remote areas for Environmental Health Officers and other currently authorised officers to obtain practical auditing experience. E.g. experienced EHO's, meat inspectors, regional mentoring system.
- Food regulators may have to employ Food Safety Auditors that can be accessed by businesses.
- State/ territory governments could play a role in facilitating arrangements where the services of a single food safety auditor are shared between a number of local governments.
- Encourage regional EHOs to become auditors.
- Provide more training in a distance learning format (for example on-line) to rural and regional areas. Also consider professional development of existing resources such as EHOs.
Industry key themes: Training and Subsides
Comments included:
- As a matter of priority begin training programs to train new auditors with the appropriate skills and knowledge.
- Subsidised travel and accommodation. Subsidised training for remote based applicants. Scheduling audits to cover people in an area in one trip. Recognising equivalence.
- Offer courses in regional areas. Run courses 'at cost' (for example: FoodSafety Victoria provided 'one off', no cost courses for food businesses when the new Victorian legislation was introduced). RTO's could be utilised to run auditor training courses in country areas, with the costs being split between surrounding local authorities.

Food Safety Auditor key themes: Resource sharing and Subsidies
Comments included:
- Subsidise cost, taxation breaks.
- Establish a regional mentoring program, and possibly an exchange system whereby auditors in remote areas have regular exposure to businesses requiring auditing - thus ensuring that these auditor do not lose their skills through inactivity. Further, given that it is generally new graduates who go to work in remote areas, ensure that universities provide new graduates with the necessary skills and experience to be automatically approved as an auditor.

To encourage auditors to undertake work in remote locations the food regulator could subsidise travel and audit costs - making it more attractive for experienced approved auditors to undertake these audits.
- Combining regional areas into groups to facilitate regional food audit arrangements and thus reduce costs. Encourage local government authorities to look at resource sharing of auditor for their communities.
Issue 10: Reducing multiple audits

How can regulators help food businesses reduce multiple audits that arise from regulatory and market-driven programs?

Government key themes: System equivalence and Market forces
Comments included:
- Market drive programs are driven by market forces and may contain some food safety elements. If such programs are to be accepted and include all relevant food safety issues, it must be ensured that market forces are not compromising food safety.
- If auditors are approved/recognised for more than one function there are potential efficiencies and economies. If a food safety standard that is acceptable to both regulators and system owners is adopted across all states then this will also help address this issue.
- Encourage recognition of system equivalence; accept third party audits; agree to a national framework for the management of food safety auditors.

Industry key themes: Information sharing and System equivalence
Comments included:
- Ensure that the audits are on a consistent basis that is available to other authorities and other approved organisations.
- Ability to have an auditor carry out both regulatory and commercial audits at the same time.
- Most market driven programs require compliance with regulatory compliance.

Food Safety Auditor key themes: System equivalence
Comments included:
- Encourage businesses (education and industry meetings) to accept the legislative audit in place of their market driven ones. Existing bodies/programs need to incorporate the regulatory requirements of food safety plans.
- Strive for uniform food legislation and "audit one, approval all".
- Regulators can reduce multiple audits by accepting third party audits, both from commercial third party auditors and other government agencies.
Issue 11: Terminology for types of audits.

The recurring comments from respondents throughout Issue 11 were that Australia needed nationally recognised standard terminologies and definitions that were clear and concise.

11a): Preferred term(s) in order of preference, for the process of conducting the first full review of a food safety program to ensure its adequacy and implementation including desk and on-site auditing.

<table>
<thead>
<tr>
<th>Terms</th>
<th>Government</th>
<th>Industry</th>
<th>Food Safety Auditor</th>
</tr>
</thead>
<tbody>
<tr>
<td>First preference</td>
<td>Initial audit</td>
<td>Approval audit</td>
<td>Initial audit</td>
</tr>
<tr>
<td>Second preference</td>
<td>Approval audit</td>
<td>Initial audit</td>
<td>Approval audit</td>
</tr>
</tbody>
</table>

NB Some respondents ticked several boxes in order of preference, others ticked only one box.

*The three ‘other’ terms specified were: Verification audit; Full systems audit; and Desk top audit.

Based on first and second preferences, respondents most preferred term was ‘Initial audit’, followed by ‘Approval audit’. These were general preferences across industry, government and food safety auditing representation.

11b): Preferred term(s) in order of preference, for the periodic review of the food safety program to ensure that the system continues to be effective as a whole.

<table>
<thead>
<tr>
<th>Terms</th>
<th>Government</th>
<th>Industry</th>
<th>Food Safety Auditor</th>
</tr>
</thead>
<tbody>
<tr>
<td>First preference</td>
<td>Verification audit</td>
<td>Verification audit</td>
<td>System audit</td>
</tr>
<tr>
<td>Second preference</td>
<td>System audit</td>
<td>System audit</td>
<td>Full systems audit</td>
</tr>
</tbody>
</table>

NB Some respondents ticked several boxes in order of preference, others ticked only one box.

Based on first and second preferences, respondents most preferred term was ‘System audit’, followed by ‘Verification audit’. These were general preferences across industry, government and food safety auditing representation.

Support for the term ‘System audit’ was on the basis that it is a simple and accurate description of this audit, which is evaluating/reviewing the whole system being used. ‘Full systems audit’ was seen by some as a stronger version of this. ‘Verification audit’ was considered by some government representatives to be more in line with their current legislation, however other government and industry representatives claimed that ‘Validation audit’ was better understood. Mention was made that ‘Validation audit’ was used differently in international contexts. [ed…This indicates some confusion and inconsistency with either ‘Validation/Verification’ term.]
11c): Preferred term(s) in order of preference, for the assessment of whether the food safety program, as documented by the business, is being complied with.

<table>
<thead>
<tr>
<th>Terms</th>
<th>Government</th>
<th>Industry</th>
<th>Food Safety Auditor</th>
</tr>
</thead>
<tbody>
<tr>
<td>First preference</td>
<td>Compliance audit</td>
<td>Compliance audit</td>
<td>Compliance audit</td>
</tr>
<tr>
<td>Second preference</td>
<td>Surveillance audit</td>
<td>Verification audit</td>
<td>Surveillance audit</td>
</tr>
</tbody>
</table>

Based on first and second preferences, respondents most preferred term was ‘Compliance audit’, followed by ‘Surveillance audit’.

Overall, ‘Compliance audit’ was commented on being the most accurate description of the audit. Slightly more government representatives than industry preferred ‘Verification audit’ and considered ‘Compliance audit’ to have too wide a scope. An industry member also noted that the ‘Verification audit’ would fit with Codex terms.

11d): Preferred term(s) in order of preference, for the review before the next scheduled audit in response to audit findings which identify an area of concern.

<table>
<thead>
<tr>
<th>Terms</th>
<th>Government</th>
<th>Industry</th>
<th>Food Safety Auditor</th>
</tr>
</thead>
<tbody>
<tr>
<td>First preference</td>
<td>Non-conformance audit</td>
<td>Follow-up audit</td>
<td>Follow-up audit</td>
</tr>
<tr>
<td>Second preference</td>
<td>Follow-up audit</td>
<td>Non-conformance audit</td>
<td>Re-audit</td>
</tr>
</tbody>
</table>

NB Some respondents ticked several boxes in order of preference, others ticked only one box.

Based on first and second preferences, respondents most preferred term was ‘Follow-up audit’, followed by ‘Non-conformance audit’.

‘Follow-up audit’ was considered to be a clear and accurate description by many from Industry, Government and Auditing bodies, however some Government representatives indicated that ‘Follow-up’ was too broad and that ‘Non-conformance audit’ implies the reason for extra audit.

11e): Are there any other terms describing different types of audits that food regulators should standardise nationally?

Many respondents felt the audits were covered by the terms in a-d, but clear national, definitions of the following terms were also requested:

**Government**

- "Check Audit" has not been utilised - that is a definition for such activities as complaint investigation, check against an auditor, check against 1 or elements of a program or new standard or CCP or even to check for regulatory compliance against another system.
Industry
• Desk audits needs to be defined.
• There seems to be confusion in the QA world about accreditation and certification
  and these two terms are often used interchangeably.
• The framework must acknowledge that there are, in effect, three different types of
  assessments that may be undertaken at this stage. They are an inspection, a
  compliance check and an audit.
• The terms Certification or Accreditation Audit should be used to describe the audit
  that follows the initial evaluation and on which the business is deemed compliant.
• 'GAP audit' needs to be defined and used in a standard manner

Food Safety Auditor
• Compliance assessment – a term to describe the assessment of a food premises by an
  EHO for compliance with requirements for good manufacturing and hygienic
  practices in food manufacturing or primary production and consistent with obligation
  under Food Standards Code, but which is not an audit and for which the EHO does
  not need to be a certified auditor
### Issue 12: Terminology for non-conformances

**12a): Do you agree all food regulators should have consistent terminology for types of non-conformances?**

<table>
<thead>
<tr>
<th>Bodies</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industry</td>
<td>16</td>
<td>1</td>
</tr>
<tr>
<td>Food Safety Auditors</td>
<td>11</td>
<td>1</td>
</tr>
<tr>
<td>Government</td>
<td>13</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>40</strong></td>
<td><strong>3</strong></td>
</tr>
</tbody>
</table>

**12b): Is it appropriate for all Australian food regulators to agree to classify non-conformances as ‘notifiable’ and ‘non-notifiable’?**

<table>
<thead>
<tr>
<th>Bodies</th>
<th>Yes</th>
<th>No</th>
<th>Unsure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industry</td>
<td>11</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>Food Safety Auditors</td>
<td>6</td>
<td>4</td>
<td>2</td>
</tr>
<tr>
<td>Government</td>
<td>9</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>26</strong></td>
<td><strong>7</strong></td>
<td><strong>9</strong></td>
</tr>
</tbody>
</table>

**12c): Are there any issues or problems with food regulators being free to choose different terms for types of non-notifiable non-conformances?**

<table>
<thead>
<tr>
<th>Bodies</th>
<th>Yes</th>
<th>No</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Industry</td>
<td>14</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Food Safety Auditors</td>
<td>8</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Government</td>
<td>9</td>
<td>5</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>31</strong></td>
<td><strong>8</strong></td>
<td><strong>2</strong></td>
</tr>
</tbody>
</table>

**Government key themes:** Support for standardisation of terms nationally. Comments included:
- We agree that there needs to be nationally consistent terminology to describe the non-conformances described as notifiable and non-notifiable.
- Whilst different regulators may have different responses to the more major non-notifiable non-conformances, the terms should be consistent.
- Certainly will not work if terminology is not consistent. We could hardly have Queensland Health having one set of terms for Govt aged care facilities and local authorities having another set.

**Industry key themes:** Support for standardisation of terms nationally. Comments included:
- Consistency is very important as training for industry is nationally consistent and national competency standards are used to underpin training.
- If different terms are used there is unnecessary potential for confusion, particularly where auditors or auditees operate interstate.
- Need consistent terminology to ensure wide acceptance - particularly with customer audit requirements.
Food Safety Auditor key themes: Support for standardisation of terms nationally.
Comments included:
• Open for interpretation everything must be consistent no areas for we think this is better, one rule suits all.
• Different industries require different terminologies, but must be standardised within sector
• This would lead to inconsistency and businesses that have outlets in different states would be left uncertain over actions to be taken and the rectifications that are required.
• Provided that the primary categories of notifiable and non-notifiable are retained then additional subcategories should not pose a problem.

12d): What are your preferred terms for types of non-conformances?

Government key themes: Minor, Major and Critical
Other suggestions included:
• We do not have any preferred terms for types of non-conformances at this stage, but agree that nationally consistent terms are adopted. The Working Group could consider the terms 'immediately notifiable' (i.e. immediately or within 24 hours) and 'notifiable' (i.e. via audit report) for those non-conformances that need to be reported to an enforcement agency.
• Notifiable non-conformance, Non-notifiable non-conformance

Industry key themes: Minor, Major and Critical
Other suggestions included:
• Food safety non-conformance; Non-food safety related non-conformance
• 1: Non-conformance 2: Corrective action 3: Opportunities for improvement.

Food Safety Auditor key themes: Minor, Major and Critical
Other suggestions included:
• Non-compliance, defects
• Serious non-conformance and non-conformance.
Issue 13: Frequency of audits

13a): Is it important for all food regulators to have the same minimum number of food safety audits?

<table>
<thead>
<tr>
<th>Bodies</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industry</td>
<td>14</td>
<td>1</td>
</tr>
<tr>
<td>Food Safety Auditors</td>
<td>7</td>
<td>2</td>
</tr>
<tr>
<td>Government</td>
<td>10</td>
<td>5</td>
</tr>
<tr>
<td>Total</td>
<td>31</td>
<td>8</td>
</tr>
</tbody>
</table>

**Government comments:**
- National consistency is particularly important for businesses and auditors that operate in more than one jurisdiction.
- It is important for food regulators to have the same minimum number of food safety audits; however this should be risk based and also based on food business performance and outcomes achieved during the audit process.

**Industry comments:**
- No, frequency of audits should be risk based.
- Consistency amongst regulators will achieve confidence in the system.

**Food Safety Auditor comments:**
- To ensure all businesses have at least a minimum number of audits over a given time period.
- Should be operated under a risk classification system so while some businesses (e.g. high risk businesses) may be routinely audited every 3 months, other (lower risk) businesses may only require audits every 12 months to 24 months.

13b): If you answered ‘Yes’ to (a), what should be the minimum frequency of food safety audits?

<table>
<thead>
<tr>
<th>Frequency</th>
<th>Industry</th>
<th>FSA</th>
<th>Govt</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yearly</td>
<td>8</td>
<td>5</td>
<td>8</td>
<td>21</td>
</tr>
<tr>
<td>Other (including 3 years or varying the time based on performance.)</td>
<td>4</td>
<td>0</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>6-monthly</td>
<td>1</td>
<td>2</td>
<td>2</td>
<td>5</td>
</tr>
<tr>
<td>2 years</td>
<td>2</td>
<td>2</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>9-monthly</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>18 months</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

Overall preference is for yearly audits.

**Government comments:**
- I agree with minimum frequencies; however this should be risk based. High risk could be 6 monthly, medium risk yearly and low risk every 18 months for example. Food businesses will be rated in relation to food safety risk and it is appropriate that auditing frequency also reflects this risk rating. Not covered in this questionnaire or the discussion document, it is essential that regulators can require increased audit frequency due to poor food safety performance.
• It fits into annual registration and licensing programs.

**Industry comments:**
• Variable depending on risk of process and level of compliance/corrective actions arising from last audit. Higher risk/non-conformance equals higher frequency.
• 12 months seems to be a common sense approach. Possibly a longer time frame would be acceptable for low risk operations and demonstrably good performers, but this may be difficult from an administrative perspective

**Food Safety Auditor comments:**
• All businesses should start with a minimum audit frequency and be assessed upwards in frequency from a minimum base. That is a low risk business would have a longer time between audits than higher risk business.
• If a business is found non-conforming, then the frequency could be increased in relation to the severity of the non-compliance.
Issue 14: Auditing terms to guide jurisdictions

Australian food regulators propose to endorse the list of food safety auditing terms in order to promote greater consistency. Are these terms appropriate to guide Australian governments? Please provide comments on which terms should or should not be included.

Most Government respondents were supportive of the list of terms. The following are only the suggestions for improvements or items of concern.

Government comments:

• The following terms should be based on the Australian Standard for Risk Management and not CODEX: risk, risk analysis, risk assessment, risk assessment policy (?), risk characterisation, and risk communication. Consider including Audit Objectives (as referred to in the definition for Audit Conclusions). Consideration could be given to re-defining some of the definitions in an Australian context, e.g. to refer to Food Safety Programs as opposed to HACCP.

• We do not agree with the complete listing given in Appendix 7 and have specific concerns about specific terms. Some examples include: Audit Client is not needed as Auditee is used; Audit Conclusions should be changed to Audit Report; the definition of Audit Frequency needs amendment; the definition of Corrective Action requires amendment; Food Safety Program is missing; Accreditation is missing; Non-conformance is missing; question why the word Official is used; Validation and Verification definitions need amendment.

• The term "auditor" should be given further consideration. Should this be changed to "food safety auditor" to reflect legislative requirements and the intent of the process? An auditor for the purposes of food safety auditing is more than a person with the competence to conduct audits. Auditors carrying out food safety audits are also approved under legislation to carry out such activities and have specific obligations imposed on them under the legislation.

Most Industry respondents were supportive of the list of terms. The following are only the suggestions for improvements or items of concern.

Industry comments:

• Exclude: Official Inspection systems and official certification systems. Officially recognised system and officially recognised certification systems. Quantitative risk Assessment. Qualitative Risk Assessment. Too confusing- all others should be included.

• No. Is there really a need for the use of the word “official” in association with the words inspection, accreditation and certification system. This seems to be both unnecessarily bureaucratic and redundant.

Most Food Safety Auditors respondents were supportive of the list of terms. The following is only the suggestions for improvement.

Food Safety Auditor comments:

• HACCP should be changed to food safety plan otherwise business will be confused regarding the terms and will not understand the two terminologies.
Issue 15: Forum for resolving national ‘approval’ issues

Food regulators will need to develop a means to deal with national food safety auditor management issues, cross-jurisdictional matters and periodically review the effectiveness of the system and approval criteria.

What is the best way these issues can be nationally managed?

The majority of Government respondents saw the Implementation Sub Committee (ISC) or an organisation to be specifically created for the task to be the best placed to manage these issues nationally.

Government comments included:
- A national committee with representatives of all food safety regulators could meet as required to deal with national and interstate food safety audit management issues. The Implementation Sub Committee could possibly be responsible for managing these issues overall. ISC could form working groups as required or take other actions to undertake the work. Policy issues could be referred to the Food Regulation Standing Committee as needed.
- Establish a committee with representatives from all the relevant parties that would meet when required in order to discuss, review and resolve national food safety auditor management issues.

The majority of Industry respondents saw Food Standards Australia and New Zealand (FSANZ) or an organisation to be specifically created for the task to be the best placed to manage these issues nationally.

Industry comments included:
- As with all the food standards, FSANZ should have responsibility for implementation and in particular consistency of implementation. There should be some means whereby lack of consistency brings some financial penalty to the jurisdiction. The FSANZ process would need to be subject to a transparent industry involvement process.
- Establish a committee to resolve issues. National Conferences, Conference calls, Internet based questionnaires to industry and auditors, Key personnel in each state to champion the system.

The majority of Food Safety Auditors respondents wanted an organisation to be specifically created for the task to be the best placed to manage these issues nationally.

Food Safety Auditor comments included:
- This could be achieved through the agreed national regulatory body, which could be in communication with state jurisdictions.
Issue 16: Mandatory notification of misconduct

If an approved food safety auditor has their approval withdrawn (for example, due to misconduct) and they are removed from a register, should there be mandatory notification to all food regulators?

<table>
<thead>
<tr>
<th>Bodies</th>
<th>Yes</th>
<th>No</th>
<th>Unsure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industry</td>
<td></td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Food Safety Auditors</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Government</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>35</td>
<td>2</td>
<td>4</td>
</tr>
</tbody>
</table>

All Government respondents were supportive of notifying food regulators. The following are additional Government suggestions:

- For general public: maintain a current register. For regulators: have access to a status register list. Containing name and current status such as reason for deregistration.
- Secure web site access for food regulators via password maybe useful for food safety auditor has their approval withdrawn. Yes all food regulators should be notified, so as to ensure that audits are not been carried out by and unapproved auditor.

The majority of Industry respondents were supportive of notifying food regulators. The following are additional Industry comments:

- Maybe after a series, e.g. three, misconducts
- Reason must be stated, as it may be for reasons that are relatively innocuous e.g. non-payment of fees or insufficient professional development. Approval may also be surrendered or simply not renewed. Must also have a formal appeal/grievance system (such as that proposed under RABQSA scheme)
- De-registration is a drastic step with consequences and consideration must be given to enable individuals to seek compensation and damages for wrongful de-registration.

All Food Safety Auditor respondents were supportive of notifying food regulators. The following are additional Food Safety Auditor suggestions:

- This is a very important part of a plan to address the potential ramifications of inadequate auditing. From a national database the most current list of approved auditors should be available. A flagged alert system should notify regulators of these cases to ensure an immediate action plan can be adopted.
- Notify State governments and they notify local government authorities. Auditor details to be removed from register. It is up to the enforcement agency/business owner to research if approval current and exists.