

## **Foodborne Illness Strategy Stakeholder Consultation - examining options March - April 2018**

In April 2017 the Australia and New Zealand Ministerial Forum on Food Regulation (the Forum) agreed that one of the three priorities areas for 2017-2021 is to reduce foodborne illness, particularly related to *Campylobacter* and *Salmonella*, with a nationally-consistent approach. Ministers requested the development of an Australian strategy, noting New Zealand has an existing *Campylobacter* strategy.

The Forum asked that the strategy be developed in collaboration with industry. In November 2017 the Forum gave in-principle support for the framework that outlines the vision, approach and objective for Australia's Foodborne Illness Reduction Strategy for reducing foodborne illness in Australia. This framework is included on the next page.

### **Details of Consultation**

- The consultation commenced on 12 February 2018 and closed on 29 March 2018. In response to requests from stakeholders to lodge late submissions the closing date was extended until 6 April 2018.
- Consultation was multi-faceted and utilised existing networks. States and Territories consulted at the local level and Food Standards Australia New Zealand (FSANZ) facilitate national roundtables that brought together industry sectors.
- A total of 48 submissions were received (including four late submissions) from the following stakeholder groups:
  - 17 (seventeen) from industry organisations;
  - 2 (one) from a consumer;
  - 1 (one) from a public health organisation;
  - 8 (eight) from other stakeholder organisations; and
  - 20 (twenty) from government organisations.
- In addition reports from five national forums and eleven jurisdictional roundtables were received.
- The submissions and reports have now been analysed and the following is a list of key issues raised.

**Analysis of Submissions**  
**Summary of issues raised during engagement**

Submitter	Proposed activities	Additional activities to be included in the strategy	How the evidence base could be strengthened
Food & Beverage Importers Association <i>(Not-for-profit association )</i>	Support the proposed actions.	Training and education of mid to low tier operators and food processors. A dedicated and concerted effort to police small independent importers and retailers.	Identified allergen and ingredient content of ethnic foods in small independent retailers should be looked at.
Manassen Foods <i>(Food industry)</i>			
<i>(Consumer)</i>	Support improving food safety culture. Need to focus on states' inconsistency.	Suggest a national Food Act, requiring all businesses have a Hazard Analysis Critical Control Point (HACCP) system and better Environmental Health Officer (EHO) training be included.	Introduce real-time monitoring and surveillance of patients by GPs.
Stanley College <i>(Trainer)</i>		Suggest requiring all businesses to have food safety programs and nationally recognised training.	More stringent guidelines, checks and reporting procedures by EHOs.
<i>(Consumer)</i>	Focus on consumer education and importance of hand hygiene.	Contamination of raw chicken meat should be monitored and reported.	
Port Pirie Regional Council, SA <i>(Government)</i>	Support proposed activities but need national Food Act.	Initiative that results in an accredited and mandatory National Safe Food Production/Handling education program.	Support measures in Table 1.
AUSVEG <i>(Peak industry body)</i>	Support actions however should establish commodity specific food safety experts, so that there is a central, definitive voice. Incorporate industry information into future activities.	Industry collaborations. Develop a resource hub. Engagement with extension networks. Use industry research, and incorporate into industry food safety programs such as Freshcare FSQ.	Makes sure evidence is based in Australian conditions, not adapted from overseas. Gather data from current implementation methods on-farm. Explore ways to enable anonymous reporting of food safety issues.

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Australian Eggs ( <i>Industry service provider</i> )	Education throughout the supply chain as indicated in the proposed mid to long-term action is crucial.	A co-regulatory approach to the industry Quality Assurance (QA) program. Better training and support for EHOs to better recognise the food safety risk in restaurants, cafes and catering.	Regulators should not be swabbing farms but promote farmers do this and implement appropriate actions.
Rawganix Farm ( <i>Food industry</i> )	Suggest investigating current methods which give good outcomes.	Review and evaluate best practice methods.	Look at businesses with best outcomes and see how that is achieved.
Tablelands Regional Council, Qld ( <i>Government</i> )	Strategy is proactive but lacks clarity on required resources and resourcing. Suggests a broader focus may be required (more foods). Legislation may be needed to support information sharing.	Insert measures to reduce illness not industry codes of practice e.g. regular testing and maximum limits of pathogens, supported by regular monitoring programs.	Ensure that data collected is processed and circulated in a timely manner.
Cumberland Council, NSW ( <i>Local Government</i> )	Strategy does not recognise the role that local government can play and whether they have capacity. A nationally consistent approach to the use of high risk food products (e.g. enforcement protocols and a national education campaign) is needed.	Incentives/disincentives for businesses that do the right/wrong thing. Engaging with television to get consistent messages. Increase university training of environmental health professionals. Harmonisation of standards across states. Greater access (format and in several languages) for food businesses.	Access by EHOs and industry to a national database of outbreaks, causes and measures to rectify. Surveying businesses and looking at practices. Survey local government on adoption of enforcement policies.
CCP Technologies ( <i>Private sector</i> )	The importance of technology needs to be highlighted e.g. blockchain, the Internet of Things (IoT).	Strategy should include more practical measures to promote technology adoption at the state level.	Capturing data is the starting point with businesses required to post temperature and other records to a food safety blockchain.

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Food Safety Standards & Regulation, Qld Health <i>(Government)</i>	Queensland strongly supports the core areas and recognises that industry engagement is imperative.	Nil, as discussed above, the activities effectively address a through-chain approach.	Collection of data at a national level from control points along the supply chain is recommended. Existing arrangements for collecting data after the event needs to be augmented by real time collection of data wherever possible.
Dietitians Association of Australia <i>(Public Health)</i>	DAA supports the strategy, however recommends considering national and global approaches re use of antimicrobials.		
Restaurant and Catering Australia Australian Hotels Association <i>(Food industry)</i>	Supports the overarching objective but cautions imposing unnecessary administrative or regulatory burden on the food service sector.	The strategy should prioritise the development of a common set of national food safety standards which are applied and interpreted consistently to businesses operating across all Local Government Areas.	Proper and robust data collection on the causes and sources of foodborne illnesses is needed.
KFC Australia <i>(Food industry)</i>	Supports strategy particularly removing inconsistencies in interpretation, implementation and response across jurisdictions.	Supports the implementation of a National HACCP Accreditation program across the whole food supply chain.	Collection of foodborne illness data to be done consistently and on a regular basis and reported on in a timely manner to assess the impact of the introduced strategy.
Joint Accreditation Scheme of Australia & New Zealand (JAS-ANZ) <i>(Industry)</i>	The strategy omits engaging and collaborating with 'independent' assessors of conformance.	There is an opportunity for the strategy to acknowledge the role and the responsibility of certification bodies to assess the food safety culture.	A vulnerability risk assessment of the food supply needs to be done.
City of Mt Gambier, SA <i>(Government)</i>	Education should be highlighted with food safety training compulsory for all new business.	A national approach to food safety promotion.	

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University of Sydney - ARC Training Centre for Food Safety in the Fresh Produce Industry (University)	Nil.	Externalities such as the social, economic and environmental costs associated with implementation of mitigation strategies, should also be considered.	Providing a suitable framework for the sharing of data is essential.
Environmental Health Australia, NSW Inc. (Not-for-profit organisation)	Promote the strategy to the medical profession.	Suggests compulsory development for regulators and make food safety supervisors mandatory.	Funding for proactive sampling in retail and further research to identify the cause of increase.
Australian Chicken Meat Federation Ingham's Golden Cockerel Australian Duck Meat Association (Food industry)	Supports a national strategy however questions what new initiatives are planned and the linkage between state activities and national activities. Consistent methodology for monitoring and surveillance important.	Include prioritising of activities for resourcing. Identified a number of activities e.g. communication to the medical sector, assessing inconsistent implementation of standards, developing robust sampling protocols.	
Eastern Health Authority (Government)	Improving food safety culture is essential for long term voluntary compliance. Consistent and straight forward education.	Specific training regarding processes needs to be made available to these businesses.	Improved data access through electronic reporting systems.
City of Port Adelaide, Enfield (Government)	Include Government in the implementation/dissemination of this educational material.	Suggest an emphasis on GPs role in sampling and characterisation and reporting. Information on home food safety e.g. preventing cross-contamination, poultry/egg hygiene practices. School education. Engaging with various cultural groups to get advice on influencing cultural change.	Getting doctors to provide more samples for confirmation. Ensure EHOs are part of decision-making.
Food Safety Information Council (Other)	Supports the activities.	Consumer food safety research and education campaigns.	Improved epidemiological data on sporadic cases and outbreaks to inform education.

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Rockhampton Regional Council, Qld (Government)	Support the strategy and suggested ways for information to flow to local government.	Nil.	Focus on the key localities where outbreaks are occurring to determine possible pathways.
City of Onkaparinga, SA (Government)	Consistency is needed within the food regulation system.	Include licencing, compulsory training and record keeping.	Improved access to investigation and monitoring information for councils.
Australian Food and Grocery Council (Industry association)	Supports the strategy particularly the development of strong food safety culture. Monitoring and surveillance should be prioritised to improve understanding of causes of food borne incidents. Food hygiene campaign needed, support for consumer education.	Recommends the immediate reintroduction of reporting of aggregated national data on the incidence of foodborne illnesses.	Support for research be carefully targeted.
Victorian Departments of Health and Human Services (DHHS) and the Department of Economic Development, Jobs, Transport and Resources (DEDJTR) (Government)	Supports the strategy and provided specific guidance for eggs, leafy greens and strawberries.	Suggest exploring options for <i>Listeria monocytogenes</i> management. Suggest series of activities focussed on horticulture including product traceability and communicating advantage of certified food safety systems.	Up to date national reporting and food handler knowledge survey.
CSIRO (Research organisation)	Support the proposed activities.	Consideration should be given to a specific target for reduction of salmonellosis and campylobacteriosis.	It will be important to establish baselines for the pathogens, and data needs to be gathered in a consistent manner for effective comparisons.
City of Playford, SA (Government)	Support the proposed activities however the lack of a consistent regulatory approach is not covered.	Mandatory national registration and training.	Unsure.

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Australian Pork Limited ( <i>Research organisation</i> )	Supports greater information sharing, industry engagement and consolidating information across jurisdictions.	No further suggestions at this time.	Recommend on-going assessment, surveillance and research of foodborne illness risk prevalence in overseas production systems.
City of Tea Tree Gully, SA ( <i>Government</i> )	Questions how success will be measured and effectiveness of actions determined.	Suggests including food safety programs for businesses, record keeping and mandatory training for food handlers.	A national system to track trends.
Voice of Horticulture ( <i>Food industry</i> )	Would support initiatives that upskill authorised officers to close the gap between knowledge and application and improve food safety culture in informal and formal training. The complexity of the Food Act and its interpretation is an issue.		
City of Marion, SA ( <i>Government</i> )	Strategy is a great initiative and supports the activities. Suggest adding food defence and Listeria to the focus.	Promotion of food safety through multiple channels including through school curriculums.	Have research projects available to PhD students with results being available.
Environmental Health Australia (Queensland) Inc. ( <i>Not-for-profit organisation</i> )	Support activities with added focus of developing national competencies, greater information sharing with local government.	Provision of recall information to local government. Suggest more specific activities for horticulture; improve process of disseminating information to local governments.	Surveys of regulators on how they assess skills and knowledge, their provision of education, and resources required.
City of Launceston, Tasmania ( <i>Government</i> )	Support the activities and welcome an overarching education based approach and resources to support food safety culture.	No additional comments, agree with outlined proposal.	No additional comments, agree with outlined proposal.

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Australian Food Microbiology ( <i>Other</i> )			Need One Health approach to <i>Campylobacter</i> (Campy) - no Australian epi data to identify if Campy cases are related to companion animals, food industry.
District Council of Mount Remarkable, SA ( <i>Government</i> )	There is a need for better resourcing, recognition and standardised training for EHOs.	A national registration system with annual renewal dependant on food safety compliance history.	Linking agencies performance based annual audit return for inspections.
Produce Marketing Association Australia-New Zealand ( <i>Not-for-profit organisation</i> )	Supports activities but cautions that more consultation will be needed at a national level on the idea of a national <i>Salmonella</i> plan for horticulture.	Development of training resources and integrated communication between government and supply chain members.	Refer to additional activities.
OzFoodNet and Communicable Diseases Network Australia ( <i>Government</i> )	Suggested prioritising items in a matrix by impact and ease of implementation (resourcing \$ and people). Support the activities noting that risks in the horticultural supply chain should cover many potential pathogens.	To avoid duplication by jurisdictions national guidelines should be developed (a number were suggested). The importance of introducing national consistent strategies for <i>Salmonella</i> was noted as well as the need for considerable resources to be used to educate the public on safe food handling.	Produce a current and timely report on current state of play and seek input/advice from key stakeholders. Conduct investigations to collect any missing information. Evaluate Foodborne Illness (FBI) reduction strategies in NSW and Qld with recommendations for best practice in other jurisdictions.
National Centre for Epidemiology and Population Health, The Australian National University ( <i>Research organisation</i> )	The emphasis on jurisdictional initiatives becoming national initiatives is great, as it reduces overlap and makes use of jurisdictions extensive experience with food safety.	A greater emphasis on the importance and central role of Whole Genome Sequencing (WGS) in generating actionable intelligence.	Developing better models of source attribution and finalising costing of foodborne illness. Better analysis of outbreak data. Nationally connected integrated surveillance of human foodborne infections and food-based pathogens using WGS.



Summary from round table discussion	Industry
<ul style="list-style-type: none"> <li>• Agreed with the vision and objectives and supported the implementation of the proposed activities.</li> <li>• Strongly supported research, industry and regulators coming together and discussing research outcomes and industry initiatives with follow-up discussions amongst regulators to determine what could be implemented nationally and consistently.</li> <li>• Stressed importance of skills and knowledge, specifically re-educating farmers and processors and upskilling EHOs.</li> <li>• Agreed that the primary production and processing standard for egg products did not need to be changed however its implementation should be reviewed.</li> <li>• Identified the need for improved messaging around particular risks e.g. use of cracked eggs.</li> <li>• Supported ongoing consultation with New Zealand on their approach.</li> </ul>	National Egg Industry Consultation
<ul style="list-style-type: none"> <li>• Agreed with the vision and objectives of Australia's strategy and generally supported the implementation of the proposed activities.</li> <li>• Implementation (particularly driving consistency) and evaluation important.</li> <li>• There should be a lead agency in each state feeding into the national strategy.</li> <li>• Inconsistent implementation needs to be addressed to show improvements.</li> <li>• Education should have a stronger focus in the strategy.</li> <li>• Strongly supported research, industry and regulators coming together and discussing research outcomes and industry initiatives with follow-up discussions amongst regulators to determine what could be implemented nationally and consistently.</li> </ul>	National Poultry Meat Industry Consultation
<ul style="list-style-type: none"> <li>• The retail food service sector is a key focus - no entry level of skills and knowledge required.</li> <li>• Role of local government is not clearly recognized in the strategy.</li> <li>• Strategy should address better ways of getting information to the food sector (not just reliant on the EHO).</li> <li>• Regulatory control of raw eggs has delivered success in NSW.</li> <li>• Better education tools are required.</li> <li>• Would welcome an outcome rather than output focus reporting.</li> </ul>	NSW State Liaison Group – Local Government (EHOs)
<ul style="list-style-type: none"> <li>• Agreed with the development of the strategy and recognition of their efforts in promoting the importance of the regulatory system focusing on reducing foodborne illness.</li> <li>• Noting the One Health strategy, interventions need to be assessed for unintended consequences, e.g. if vaccine of flocks is adopted across the board, would that impact on human resistance.</li> <li>• Supported the aim of integrating food safety and human illness data however stressed that genomic data needs to be included.</li> <li>• Development of investigation guidelines throughout the supply chain for regulators.</li> </ul>	CDNA
<ul style="list-style-type: none"> <li>• Viruses and biotoxins are the key concerns.</li> <li>• Approach of national, local and evidence-based intervention is appropriate.</li> </ul>	NSW Shellfish Committee

<ul style="list-style-type: none"> <li>• Workforce issues were the major concern, mainly the changes to the TAFE chef courses causing the chefs' skill sets to become eroded.</li> <li>• Lack of confidence in some industries/commodities - leafy greens, berries sliced and packaged deli meats.</li> <li>• Food handler training now online - not adequate compared to classroom training.</li> <li>• FSANZ should centralise information, such as the NSW translated information, Victoria's food handler training DoFoodSafely, and/or the NT disaster management.</li> <li>• Provide food safety culture support like the NZ MPI, good short videos on key processes such as cooling followed by a very short quiz.</li> <li>• Consistency with interpretation and application of the regulations.</li> <li>• Consistency in food safety/process validation across all states.</li> </ul>	<p>Food service industry – Spotless catering</p>
<ul style="list-style-type: none"> <li>• Skills and knowledge in small business (e.g. roadside stalls) an emerging risk.</li> <li>• Increasing consumer preference for free range production systems heightening food safety/biosecurity risks in the supply chain.</li> <li>• Value in a national egg farm and supply chain investigation protocol.</li> <li>• Standard 4.2.5 – application of cracked and dirty eggs in retail needs some national consistency.</li> <li>• Noted the importance of EHO training.</li> <li>• Australian Eggs happy to support a national EHO training program to allow for risk-based approach to handling, storage and processing of eggs in retail/food service sector.</li> </ul>	<p>NSW Egg Industry Consultative Committee (EICC)</p>
<ul style="list-style-type: none"> <li>• Consistency in food safety standards.</li> <li>• Access to knowledge – too dispersed, need national location.</li> <li>• There is a shortage of food safety skills and expertise in producers, particularly small producers.</li> <li>• Food safety culture is not embedded in all businesses.</li> <li>• Targets for the strategy, and what they are, should be included in the strategy.</li> </ul>	<p>Victoria Horticulture Industry</p>
<ul style="list-style-type: none"> <li>• Focus on consumer education around food safety.</li> <li>• Strategy should include clarity around who is responsible for outbreaks, where the business needs to go for an outbreak.</li> </ul>	<p>Victoria Nut processor - Select Harvest</p>
<ul style="list-style-type: none"> <li>• Lack of expertise within regulation in the very high risk areas such as chilled ready to eat food, is putting too much expectation on EHOs who are not the experts.</li> <li>• Lack of consumer knowledge regarding food safety.</li> <li>• Allergens should be included in the strategy.</li> <li>• Consumer education - opportunity to get the focus on consumers and safe food preparation in the home. Focus on high risk foods and how to manage these.</li> </ul>	<p>Retail sector – Coles (Victoria)</p>

<ul style="list-style-type: none"> <li>• Generally supportive of the strategy and aspects.</li> <li>• Specific mention was made of food safety in the home and its contribution to foodborne illness rates.</li> <li>• Was not clear how jurisdictions currently share mitigation approaches or the barriers for jurisdictions to uptake apparently successful measures.</li> </ul>	OzFoodNet
<ul style="list-style-type: none"> <li>• There should be a focus on the smaller growers and retailers and on farm food safety education.</li> <li>• Consumer education on washing produce at home.</li> <li>• Support for retailers/supply chain to implement supplier assurance programs, as pressure from customers, rather than regulators, is more likely to motivate the growers around food safety.</li> <li>• Food safety skills and knowledge survey of entry level food handlers at the growers and processors.</li> </ul>	Victorian Vegetable processing - Harvest Moon
<ul style="list-style-type: none"> <li>• 98% of food businesses are small to medium enterprises (SMEs) with large knowledge and skills gaps particularly with respect to food science and technology skills.</li> </ul>	NSW Food and Agribusiness Research Organisations
<ul style="list-style-type: none"> <li>• Professional development of EHOs particularly in FBI investigations, develop system to ensure consistency in application of legislation.</li> <li>• Provide better support for EHOs.</li> <li>• Better communication/engagement between Commonwealth, State and Local governments.</li> <li>• Communication education campaign to increase public awareness of FBI to reduce contamination at home.</li> <li>• Strategies to manage the industry qualification standards, possibly mandatory food handlers training (skills and knowledge qualifications).</li> <li>• Coordinated risk-based monitoring (food sampling).</li> <li>• Documented systems (e.g. FSP) in the food industry.</li> <li>• Reviews of legislation from primary industry through to food outlets/services (accountability at all levels).</li> <li>• Strategy should include education (risk training) programs for Local Government Associations (LGAs), food businesses and consumers.</li> <li>• Review existing guidelines, and develop new egg guidelines for handling and storage.</li> <li>• Consistent reporting of FBIs/notifiable diseases (LGAs, GPs/hospitals, labs and public).</li> </ul>	Local Government (Western Australia)
<ul style="list-style-type: none"> <li>• Strategy should include QA systems to be applied across the industry and consideration of new/emerging technologies.</li> <li>• Challenges where regulators don't consider new technologies and would prefer to enforce "traditional methods" as the best way to demonstrate compliance.</li> </ul>	Egg, Poultry, Horticultural, Industry consultants and QA officers (WA)