

Tasmanian Government Response to the - Management of Food Safety Risk in Tasmanian Primary Industries Report (*The Sumner Report*)

May 2007

Introduction

Tasmania enjoys a standard of food production that provides safe, high quality products to consumers. To maintain this high standard, the Tasmanian Government is seeking to improve the current regulatory system so as to ensure the continuation of:

- the protection of the safety and wellbeing of the public;
- Tasmania meeting minimum national standards;
- maintenance of access to interstate and international markets; and
- protection of Tasmania's reputation as a producer of clean and safe food;

in a cost-effective and efficient manner.

Hence, the Department of Primary Industries and Water (DPIW) commissioned Dr John Sumner to provide an independent risk profile of potential food safety risks along the supply chain of Tasmania's primary industries. The final report, *Management of Food Safety Risk in Tasmanian Primary Industries* (the Sumner Report), was completed in November 2004.

The Sumner Report provided an account of how food safety risks are managed in Tasmania, the responsibilities of the agencies involved and potential constraints on present food safety regulation. Importantly, it also put food safety regulation in Tasmania into the national context and, in particular, drew attention to the effects of the development of Primary Production and Processing (PPP) Standards by Food Standards Australia New Zealand (FSANZ), the national food standards setting agency. It also indicates that the globalisation of the food industry is driving the harmonisation of regulation and the requirement for a whole-of-chain approach to food safety.

For each industry category the Sumner Report identified specific issues. Of the nine industry sectors examined (excluding honey), the following issues were common to more than one sector:

- (1) A requirement for the compilation of a comprehensive database
- (2) Agency responsibility being uncertain
- (3) A need to establish a "Gold Standard" approach to promote improvement

- (4) A need for proactive training and education
- (5) A need for improved microbiological testing protocols
- (6) A need to develop specific food safety programs

The Sumner Report was presented to Heads of Agencies and the Food Safety Forum (FSF). The FSF represents the collaborative efforts of DPIW, the Department of Health and Human Services (DHHS), the Tasmanian Dairy Industry Authority (TDIA), Local Government and the Australian Institute of Environmental Health - Tasmanian Division in improving the continuum of food regulation in Tasmania. This group was tasked with developing this response to the Sumner Report for the approval of the Minister for Primary Industries and Water and the Minister for Health and Human Services.

As part of the preparation of this response, DPIW also commissioned the University of Tasmania's Tasmanian Institute of Agricultural Research (TIAR) to review the Sumner Report. TIAR's comments are incorporated in this paper.

This response to the Sumner Report principally deals with specific issues identified under the above six categories. However, consideration of the above issues has highlighted the need to review Tasmania's primary industry food safety legislation. The Tasmanian Government is of the view that if Tasmania is to achieve the most favourable outcome in relation to food safety it must put in place efficient and effective primary industry food safety legislation. This system should allow the PPP Standard to be implemented and enforced effectively whilst at the same time removing unnecessary and overlapping regulation. Any regulatory systems adopted will also be required to fit, not only with national, but also with international approaches to food safety management, namely the Hazard Analysis Critical Control Point (HACCP) approach enunciated by the Codex Alimentarius Commission.

The development of the new legislative framework will be taking place as part of the implementation of this response. The development of new legislation will be undertaken in full consultation with industry to ensure that its needs are accommodated.

Issues

1. Comprehensive Industry Database

The Sumner Report states:

“A database is an essential first step in managing food safety within a sector and especially in those sectors identified as high risk, such as smallgoods. If a controlling authority is unaware of an operation and its processes it can only manage reactively. For example, in recent years at least two manufacturers of Uncooked, Comminuted Fermented Meat (UCFM) within the State have operated outside the Food Standards Code.

Without up-to-date information on products and processes it is also not possible to complete a risk profile which has anything other than generalised conclusions. This factor has limited the present report to a qualitative profiling approach to processing of vegetables, fruits, sprouts and some smallgoods.”

Local Government continues to regulate the majority of food businesses operating in Tasmania. Businesses regulated by local government tend to be more diverse and more volatile in nature than those businesses that are administered centrally, and many are considered to be low risk because they do not deal with potentially hazardous foods. Because of these features, it is considered that the establishment of a centralised database containing information on all businesses regulated by local government would prove unwieldy and expensive to maintain. Such a system would not be as cost effective as the existing system of drawing information from the separate databases held in each municipality on a needs basis.

However, in line with a risk-based approach a centralised database will be established of businesses that are subject to the PPP Standards. In order to properly regulate the various industry sectors it will be necessary to know who the participants are, where they are located and the nature of their activities. The database will be maintained by DPIW but will require input and notifications from various sections of DPIW, DHHS and Local Government. Once completed, the database will essentially provide a consolidated list of manufacturers of high-risk foods, and their processes and products as well as filling a number of information gaps for industry sectors that have not previously been subject to food safety regulation.

Specific issues raised are in the shaded text and the Government’s responses are presented after each issue as dot points.

SMALLGOODS

Production of a consolidated list of smallgoods manufacturers, their products and processes with special reference to manufacturers of UCFM.

- DHHS will request Local Government Environmental Health Officers (EHOs) to obtain and provide data based on a standard questionnaire developed by the FSF.
- DPIW will include slaughtering premises licensed under the *Meat Hygiene Act 1985* that manufacture smallgoods.

- The completed database will indicate which smallgoods manufacturers (including butcher shops) warrant specific attention in order to implement Standards 4.2.2 and 4.2.3 (Production of Ready-To-Eat Meat) of the Australia New Zealand Food Standards Code.

GAME MEAT

Cooperate with DHHS and local government to survey use of game meats in the smallgoods sector.

- This can be addressed as above.

POULTRY MEAT

Ensure the list is comprehensive and contains all very small poultry plants.

- Completed at the time of publication of the Sumner Report.

EGGS

Production of a consolidated list of producers and processors.

- Now completed by DPIW in respect to producers for the purposes of the *Egg Industry Act 2002*.
- DHHS will request EHOs to obtain and provide data regarding processors as per smallgoods.

DAIRY

There are numerous small operators within the dairy industry producing a diverse range of products. TDIA and DHHS/Local Government (LG) should, as a matter of urgency, compile a consolidated list of manufacturers and their processes and products.

- The TDIA has always kept a consolidated list of manufacturers and their processes and products. The TDIA is willing (subject to TDIA Board's approval) to share this info with the managers of a "centralised database" subject to confidentiality and disclosure agreement.
- TDIA, DHHS and EHOs will coordinate the compilation of additional information if any information 'gaps' are identified in the same manner as for smallgoods, etc.
- The completed database will indicate which dairy manufacturers warrant specific attention in order to implement proposed Standard 4.2.4 *Primary Production and Processing Standard for Dairy Products* of the Food Standards Code.

SEAFOOD

There are two high risk product categories in the seafood sector, eg, oysters and smoked seafoods. While the former is regulated to a high level of compliance with a Gold Standard by TSQAP, the latter is not and DHHS/LG, in collaboration with DPIW should produce a consolidated list of producers and processors.

- DPIW and DHHS will coordinate the compilation of information regarding marine farmed and wild harvest bivalve shellfish including oysters, mussels, scallops and clams from TSQAP classified waters. The Licensing and Administration Branch of DPIW's Primary Industries Division can provide data on licensed fishers, farmers and processors.
- The completed database will indicate which growers, fishers and processors warrant specific attention in order to implement Standard 4.2.1 *Primary Production and Processing Standard for Seafood*.

- EHOs are to provide smoked seafood processor information to DHHS. However, as smoked seafood falls outside the scope of the PPP Standards this information will be maintained by DHHS.

VEGETABLES

Production of a consolidated list of producers and processors.

- DHHS and EHOs will provide processor information. DPIW's Vegetable and Associated Industries Branch can provide data on producers that undertake processing.
- The completed database will indicate which producers and processors warrant specific attention in order to implement the proposed *Primary Production and Processing Standard for Plant and Plant Products*.

FRUITS

Production of a consolidated list of producers, processors and their products.

- DHHS and EHOs will provide processor information, with emphasis on identifying pasteurised and non-pasteurised juices. DPIW's Horticulture Branch, in collaboration with the Tasmanian Agricultural Productivity Group can provide data on producers that undertake processing.
- The completed database will further indicate which producers and processors warrant specific attention in order to implement the proposed PPP Standard for Plant and Plant Products.

SEEDS/SPROUTS

Production of a consolidated list of producers, processors and their products.

- The focus is sprouts which are high risk due to *Salmonella* outbreaks.
- DPIW (including Extensive Agriculture Branch), DHHS and EHOs to coordinate compilation of a database.
- The completed database will further indicate which producers and processors warrant specific attention in order to implement the proposed PPP Standard for Plant and Plant Products.

2. Agency Responsibility

“Shared responsibility for regulation requires strict definition of respective roles of each party and clear lines of demarcation. Shellfish growing and harvesting is an example of where the responsibility of both entities is both well defined and well regulated. Two officers located within DHHS are dedicated to monitoring and closing shellfish leases, while the Marine Farming Branch of DPIWE is involved in operational and audit functions (via AQIS which is the audit agent). Similarly, while the TDIA operates as an autonomous competent authority, there are shared responsibilities between DPIWE, DHHS and local government. Inspectors of both MHS and TDIA are appointed as Authorised Officers under the Food Act 2003.

In other areas, eg, growing of sprouts, washing of fruit and use of egg products, while there is broad regulatory definition, operational responsibility between DPIWE and DHHS/LG could be improved.”

The implementation of the PPP Standards will provide an opportunity to more clearly define agency responsibility rather than using the concept of ‘substantial transformation’ from the Food Act to attempt to demarcate responsibility. The PPP Standards will also provide regulatory coverage of a range of activities that have not previously been regulated.

The PPP Standards will generally be applied and enforced by DPIW or TDIA due to their subject matter relating primarily to primary production. However, it is proposed that the ‘back door’ of retail will be used as a dividing line for regulatory responsibility with DHHS and Local Government being responsible for the enforcement of the PPP Standards after this point. To ensure the consistent application of the PPP Standards Memorandums of Understanding (MoUs) will be developed. These MoUs will deal with food safety programs (FSPs), auditing and the demarcation of regulatory responsibility for facilities that produce and retail food amongst other issues.

The following sector specific responses are also provided:

SMALLGOODS

The present situation where legislative responsibility is decided by whether there is a slaughter facility linked with a smallgoods manufacture could lead to inconsistency and there is a need for DHHS/LG and DPIWE to consider regularising responsibility for managing the smallgoods sector in Tasmania either under the Australian Meat Standard or the Food Standards Code; this need will become more acute when more than 100 (?) butcher shops are required to implement FSPs.

- Standards 4.2.2 and 4.2.3 of the Food Standards Code will apply from the end of November 2007 and are consistent with the *Australian Standard for Hygienic Production and Transportation of Meat for Human Consumption* (AS4696). Application of either Standard can deliver the same outcomes, so agreement on the methodology of FSP implementation in meat slaughtering premises and butcher shops that produce smallgoods as well as independent (non-integrated) smallgoods manufacturers will be a key preliminary task to obtain regulatory consistency.
- Defining the controlling authority’s roles and responsibilities through an MOU will lead to the identification of regulatory boundaries and/or opportunities for cooperative arrangements, including agreed protocols of reporting.

DAIRY

Currently, TDIA are responsible for all dairy processing except manufacture of ice cream, which is regulated under the *Food Act 2003*. This is considered anomalous and, given the expertise required to audit dairy operations, consideration should be given to defining “ice-cream” and bringing relevant ice cream manufacturers under the *Dairy Industry Act 1994*.

Products such as dips and pates have dairy products as a major component and consideration should be given to regulating manufacturers under the *Dairy Industry Act 1994*.

- The *Dairy Industry Act 1994* applies to all sectors of the dairy industry – farms producing milk, carriers transporting milk from farms to factories, factories processing milk and manufacturing dairy products, and distributors storing and delivering dairy foods to the retail sector. TDIA staff are also authorised AQIS officers under the *Export Control Act 1982 (Cth)* to facilitate dairy exports from Tasmania.
- Ice cream is included in the definition of ‘dairy products’ in the proposed Standard 4.2.4 Primary Production and Processing Standard for Dairy Products. TDIA will apply this Standard via the *Dairy Industry Regulations 2004*.
- TDIA will enter into a MoU with DHHS and Local Government to facilitate implementation of the Standard in premises that are predominantly retail or manufacture dairy products with a significant non-dairy wholesale/retail component. This approach will provide greater consistency with other State Dairy/Regulatory Authorities and AQIS in terms of dairy products regulated, percentage of dairy content required and who is responsibility for mixed operations, etc.

SEAFOOD

The Licensing and Administration Branch licenses premises for resource management purposes while DHHS/LG enforces the *Food Act 2003*.

- DPIW have advised industry of a three-tiered approach to implementing Standard 4.2.1 *Primary Production and Processing Standard for Seafood*:
 - **High Risk** (bivalve molluscs) - licensing of facility and auditing of FSPs;
 - **Medium Risk** (‘on board’ and premises processing, eg, gutting, filleting, packing, etc) - business notification to the controlling authority, random monitoring of fishing vessels, audit/inspection of domestic land-based processors; and
 - **Low Risk** - notification only, no routine monitoring by DPIW, reactionary measures, eg, in the event of antimicrobial residue violations.
- Existing mechanisms for notification will be used where possible so as not to overburden industry. The FSF, in consultation with industry, will determine how the Tasmanian Shellfish Quality Assurance Program (TSQAP) and DPIW’s current licensing of marine farms and issuing of wild harvest licenses and permits can best be utilised as part of the the new Legislative and Administrative Model for Integrated Food Safety Management which is to be developed.

VEGETABLES

There is confusion at the operational level about which entity is responsible for legislating vegetable production/processing which is to be encompassed by a PPP Standard. Because of the definition of primary production, local government consider DPIW responsible but there is no legislation under which DPIW can act.

- FSANZ will develop a PPP Standard for Plant and Plant Products during 2007-08. This standard will be administered and enforced under the new Legislative and Administrative Model for Integrated Food Safety Management which is to be developed.
- The boundaries of regulatory responsibility established by the FSF will be utilised in applying the Standard.
- In the meantime, DHHS and EHOs are able to exercise emergency powers under the *Food Act 2003* in order to investigate or prevent the sale of unsafe food.

FRUITS

There is confusion at the operational level about which entity is responsible for legislating fruit production/processing. Because of the definition of primary production, in some cases local government may consider DPIW is responsible but there is no legislation under which DPIW can act.

- The same response as for vegetables applies.

SEEDS/SPROUTS

There is confusion at the operational level about which entity is responsible for legislating sprout production/processing which is to be encompassed by the PPP Standard. If DPIW are considered responsible, there is no legislation under which responsibility could be taken.

- The same response as for vegetables applies.

3. "Gold Standard" Approach to Promote Improvement

"Among suggested actions for various entities is the establishment of a Gold Standard. This approach has been used by South Australia's Department of Primary Industries and Resources (PIRSA) to identify areas for improvement at South Australia's smallgoods and poultry plants. A Gold Standard is basically a compilation of:

1. *Hazard management*
 - *Process validation*
 - *Verification*
 - *Corrective action*
2. *Factory layout and operation*
3. *Cleandown*
4. *Monitoring of cleandown*

Each plant is assessed for its compliance against a range of criteria under each broad heading.

A similar approach could be undertaken for the activities and operations of food safety risk managers."

Industry and government alike have a strong interest in ensuring food is safe to eat. The Tasmanian Government supports industry implementation of food safety measures, however further information is required to determine whether use of the 'Gold Standard' approach would provide any advantage over the HACCP based approach currently favoured locally and internationally.

Given that HACCP - based food safety management systems are currently required across a number of Primary Industry Sectors, it would be incumbent upon Government to demonstrate clear food safety advantages of a Gold Standard approach prior to encouraging the adoption of an additional layer of food safety procedures.

The following industry specific responses are proposed:

SMALLGOODS

Assessment of the degree to which each manufacturer's processes have been validated. A Gold Standard approach similar to that implemented by PIRSA would be an effective *modus operandi*.

- The Tasmanian Government may consider the promotion of the use of a Gold Standard at a later date if clear food safety advantages can be identified.

POULTRY MEAT

Evaluate the food safety management of all processors against a Gold Standard, similar to that undertaken by PIRSA

Adopt a proactive stance towards industry improvement.

- The same response as for smallgoods applies.

EGGS

Assessment of each operation's management of food safety against a Gold Standard.

- The same response as for smallgoods applies.

DAIRY

- A Gold Standard, or similar approach, currently exists within the dairy industry where licensees are rated according to their performance.

SEAFOOD

There are two high risk product categories in the seafood sector. eg, oysters and smoked seafoods. While the former is regulated to a high level of compliance with a Gold Standard by TSQAP, the latter is not and DHHS/LG, in collaboration with DPIWE should assess each operation's management of food safety against a Gold Standard

- The same response as for smallgoods applies.

VEGETABLES

Assessment of each operation's management of food safety against a Gold Standard.

- The same response as for smallgoods applies.

FRUITS

Assessment of each operation's management of food safety against a Gold Standard.

- The same response as for smallgoods applies.

SEEDS/SPROUTS

Assessment of each operation's management of food safety against a Gold Standard.

- The same response as for smallgoods applies.

4. Proactive Training and Education

Industry's capacity to comply with the applicable food safety standards can be enhanced by addressing skills and knowledge gaps. DPIW and DHHS are already actively involved in food safety skills development. Local governments throughout Tasmania undertake significant food safety training programs that are primarily designed to ensure that entrants to the food industry can gain sufficient basic skills and knowledge to operate safely. Many local governments also provide higher level and refresher training opportunities depending upon demand.

DHHS is involved in the provision of professional development programs for local government and where appropriate it provides direct assistance to industry to enable rapid compliance with new food safety standards. DPIW has been involved in a successful skills development program for sectors of the meat industry through a partnership with TAFE Tasmania. However, some components of primary industries food processing are not underpinned by an appropriate level of training.

The following sector specific actions have or will be undertaken:

SMALLGOODS

A proactive approach to the sector involving training based on MLA's *Guidelines for the safe manufacture of smallgoods*.

- DPIW and Meat and Livestock Australia (MLA) arranged workshops in the State which took place in late 2006, on *Listeria monocytogenes* and its risks and controls, to reinforce MLA's guidelines. EHOs and industry attended.

SEAFOOD

- Seafood Training Tasmania (STT), a "not-for-profit" registered training organisation, will identify and provide quality training to the wild catch, marine farming and processing sectors to educate and develop skills and competence for safe food production and processing and to reduce public health and safety risks.
- DPIW will continue to provide input through its representation on STT to ensure that training opportunities continue to be offered that meet the needs of the seafood sector in respect of food safety.
- The Australian Maritime College also provides quality training to the wild catch, marine farming and processing sectors in relation to safe food production and processing around the State.

DAIRY

- Skills, knowledge and competency of food handlers are requirements of TDIA FSPs.

APIARY

DHHS/LG should review its advice to mothers re feeding honey to neonates.

Use oxytetracycline but only between honey flows (September-November).

- Advice concerning feeding honey to infants under 12 months of age relates to unpasteurised honey and this advice remains current.

- Government will advise industry upon detection of a National Residue Survey violations. This is justifiable due to honey's low risk status.

5. Microbiological Testing Protocols

Microbiological testing is used by industry to validate the capacity of a procedure to produce safe food. It is also the means of verifying the operator's adherence to sound food handling practices.

RED MEAT

In view of the overall compliance of companies and the industry in general with the Microbiological Guidelines which accompany AS 4696 it is recommended that DPIW:

Undertake microbiological product testing of carcasses from small meat premises on an annual basis (note that other States, eg, Queensland have an annual testing regime).

Maintain responsibility for taking samples via officers taking samples (if testing could be linked with audit this would be most cost-effective for MHS and companies).

Arrange for analysis of samples at an authorised laboratory.

Maintain the database on a company and industry basis.

Continue a proactive stance with companies regarding their testing results.

Concentrate testing more towards carcass hygiene rather than surface testing.

- DPIW's Food Safety Branch has maintained the auditing service provided to domestic meat premises licensed under the *Meat Hygiene Act 1985*. Microbiological testing is included in this service.
- All recommendations have been adopted by DPIW since publication of the Report.

POULTRY MEAT

Undertake systematic microbiological monitoring of product from all processors (a survey of 69 samples in 2001 is the sole industry database).

Work proactively with initiatives in other States to radically reduce the prevalence of *Campylobacter* and *Salmonella* in poultry.

- Primary Industries and Resources South Australia (PIRSA) and the New South Wales Food Authority are currently undertaking a study to obtain baseline data for both summer and winter on the prevalence and levels of *Campylobacter* and *Salmonella* spp. on products sold at retail, including whole and portioned poultry meat. PIRSA and NSW initially proposed to expand this study to obtain baseline data for other stages of the supply chain.
- In order to ensure representative baseline data are obtained on the prevalence and levels of *Salmonella* and *Campylobacter* on poultry along the entire supply chain, FSANZ has proposed that the study being undertaken by PIRSA and NSW be expanded to the primary production and primary processing stages.
- This proposal was supported by the Implementation Sub-committee (ISC) Coordinated Food Survey Plan at its meeting on 6 April 2006 and nominations were received from the jurisdictions, including DPIW Tasmania, to assist with the project. FSANZ will coordinate the study and have prepared a detailed survey proposal with the assistance of the project team. DPIW will participate in survey activities late in 2007.

GAME MEAT

Sample product for microbiological testing at all game meat plants (product at some plants has either not been monitored, or very few samples have been taken).

Investigate the recorded prevalence of *E. coli* of 3% (this is much lower than that recorded in other states for kangaroo carcasses) to confirm sampling and testing are being properly carried out.

Collaborate with the Australian Food Safety Centre at the University of Tasmania for example, in establishing appropriate microbiological testing criteria for muttonbird processing, specifically in relation to indicator organisms.

- Sampling at muttonbird processing premises has been completed. Test results have generally indicated that procedures are conducive to a hygienic product.
- The new Meat Standards Committee Guidelines for microbiological testing of game meat require samples to be taken from different sites (ie, 'cutting lines') on the kangaroo (wallaby in Tasmania) carcass to those provided in the previous Guidelines. The second recommendation can be addressed once DPIW has compiled sufficient data under the new procedure.
- In relation to the third recommendation, Mr Chris Lyall, Manager (Food Safety), DPIW now represents the Tasmanian Government on the Centre's Advisory Board. This paves the way for a closer working relationship between the Centre and DPIW to identify risk management options for the respective primary industries food sectors, including preparedness for emerging food hazards. Outcomes from this arrangement can be shared by the FSF.

DAIRY

- Microbiological testing protocols are a fundamental requirement of TDIA FSPs.

6. Food Safety Programs

“Food safety programs (FSPs) are the current tool of choice for managing hazards and risks. They comprise an underpinning of Good Manufacturing Processes (GMPs) and Standard Sanitation Operating Procedures (SSOPs) on which can be erected a HACCP system. Codex Alimentarius has defined how HACCP systems are to be implemented and operated under seven General Principles (Codex, 1997).

In Australia the Food Standards Code requires that, where a State or Territory decides to implement a requirement for FSPs, it must use Standard 3.2.1. However, Standard 3.2.1 lacks definition in several key aspects. While Standard 3.2.1 mentions that a FSP must be based on “HACCP concepts” these are undefined. The Standard refers to Clause 5 for definition of content of the FSP in which there are six elements which align broadly with six of the seven HACCP principles. Missing is Principle 3 (Establish Critical Limits, CLs) an omission without which a HACCP system cannot be operated since it is against CLs that monitoring is assessed and Corrective Actions implemented if CLs are breached.”

To be addressed through Codes of Practice associated with the respective Standards.

“Thus Standard 3.2.1 allows food establishments to have a FSP which is not Codex compliant with respect to HACCP principles. In the present context, Standard 3.2.1 is not mandated in Tasmania but it is open for DHHS and LG to require establishments to implement a FSP system under Standard 3.2.1. Were that to happen in the smallgoods sector it would result in some plants operating under the Australian Standard for the hygienic production and transportation of meat and meat products for human consumption (AS 4696) and others (butcher shops) under Standard 3.2.1; the former would operate Codex-compliant HACCP while the latter would not.”

According to the Ministerial Policy Guidelines on Food Safety Management in Australia: Food Safety Programs, adopted on 12 December 2003, HACCP-based food safety programs should be mandated across the following high risk areas:

1. food service, whereby potentially hazardous food is served to vulnerable populations;
2. producing, harvesting, processing and distributing raw oysters and other bivalves (picked up under the new Standard 4.2.1 which commences by 26 May 2007);
3. catering operations serving food to the general public; and
4. producing manufactured and fermented meat (picked up under the Standard 4.2.3 – Production of Ready-to-Eat Meat, commences November 2007).

HACCP-based food safety programs are also likely to become compulsory in subsequent PPP Standards. Specific industry sectors are discussed below.

SMALLGOODS

A uniform approach to managing food safety risks in the sector based on scheduled and unscheduled audit of the FSP by auditors registered with QSA.

- FSPs will need to be in the form stipulated by Standards 4.2.2 and 4.2.3 of the Food Standards Code.
- Introduction of FSPs into Tasmanian butcher shops producing smallgoods is a major task. Implementation of the Standards and identification of an appropriate audit system requires significant coordination among the controlling authorities and so will be considered by the FSF immediately upon completion of the smallgoods manufacturers database as part of the development of an MOU.

GAME MEAT

Evaluate production at all game meat plants against the FSP.

- This was completed following adoption of FSPs by the muttonbird industry over the 2005 and 2006 processing seasons.

DAIRY

- All dairy licensees, including farms, bulk milk carriers, SMEs and distributors, are required to effectively implement a TDIA-approved FSP based on the internationally recognised principles of CODEX HACCP. These programs are audited by TDIA officers,

SEAFOOD

Currently, food safety programs are not required for domestic processors, despite the potential risk associated with some seafood products (shellfish and smoked products).

- The *Food Act 2003* provides a short-term mechanism to adopt the Seafood PPP Standard, which will allow it to come into operation by 26 May 2007. DPIW officers are already authorised under the Act and can therefore ensure compliance with the PPP Standard. The PPP Standard mandates the adoption of FSPs for high-risk sectors of the industry (bivalve mollusc). Requirements for smoked products will be managed by DHHS through the Food Act as premises and operations processing smoked seafood are identified.
- In the long term it is proposed to develop specific primary production food safety legislation separate from the Food Act, principally administered by DPIW, to administer and enforce the PPP Standard.

VEGETABLES

There is also confusion on the use of treated water. DPIW has developed guidelines for its use but at the production/processing level these guidelines defer to company food safety plans.

- To be addressed during development of the PPP Standard for Plant and Plant Products during 2007-08.

APIARY

B-QUAL is voluntary – only 3 or 4 operators are in the scheme – DPIW should consider promoting (or even mandating) the quality system.

- Honey is not on FSANZ's 'radar' for a PPP Standard and is a low risk business.
- DPIW will not require mandatory participation in the B-QUAL program but will continue to provide support at industry's request.

7. Other Issues

EGGS

Reconciliation of egg production with egg utilisation with special reference to small (non-commercial) producers.

Estimation of cracked egg production and identification of any illegal use (ie, eggs not submitted for heat processing at a recognised establishment).

Cooperation with DHHS and local government to prevent use of cracked eggs in retail and catering, particularly for institutional care.

Communication and collaboration with LG about the new Egg Act and respective roles and functions.

- The FSF will develop an MOU between controlling authorities. The MOU will include formalisation of a requirement for DPIW to alert DHHS and EHOs of major and critical nonconformances detected during audits of egg production programs.
- DHHS publicised hygienic egg handling following Salmonellosis (foodborne illness) incidences in late 2005 that were caused by consumption of egg-based products.
- DPIW has advised EHOs via DHHS on the scope and application of the *Egg Industry Act 2002*.