



February 2008

**Submission from the Dietitians Association of Australia
PROPOSAL P290 - FOOD SAFETY PROGRAMS FOR CATERING OPERATIONS
TO THE GENERAL PUBLIC**

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 3400 members, and branches in each State and territory. DAA is a leader in nutrition and advocates for better food, better health, and better living for all.

Contact person: Ms Annette Byron
Position: Policy Dietitian
Organisation: Dietitians Association of Australia
Address: 1/8 Phipps Close, Deakin ACT 2600
Telephone: 02 6163 5216
Facsimile: 02 6282 9888
Email: abyron@daa.asn.au

DAA appreciates the opportunity to make a submission on Proposal P290 regarding Food Safety Programs for Catering Operations to the General Public. DAA is in agreement with Option 2 to adopt Standard 3.3.2 to mandate compliance with Standard 3.2.1 – Food Safety Programs, by food businesses undertaking catering operations serving food to the general public. This support is given on the basis that the Option is consistent with public health measures to ensure a safe food supply to the general population.

The review of data on food-borne illness in Australia prior to the preparation of Proposal P290 shows that a significant proportion of outbreaks are associated with commercial catering operations, and that specific contributing factors to such outbreaks have been identified.

It is assumed that the exemption of businesses that occasionally cater and on-site caterers where the event is for less than 50 persons is based on an assessment of risk versus burden of compliance, although this wasn't clear from the 2002 Allen Consulting Group report *Food Safety Management Systems*. Anecdotal evidence provided by a DAA member suggests that voluntary food safety programs are generally not adopted by small operators, who may not have the experience or knowledge to implement and follow through a food safety program. For this reason DAA recommends that the exemption of businesses that occasionally cater and on-site caterers where the event is for less than 50 persons be reviewed, and that there be no minimum seating number. This means that all caterers, regardless of size and frequency of catering, be mandated to follow a food safety program. If this is thought to be excessively burdensome or difficult to implement, then DAA strongly

recommends appropriate monitoring of outbreak surveillance data to see that small or occasional operators are not disproportionately represented.

DAA supports continuing cooperation between FSANZ and the implementing jurisdictions to ensure that programs are in place to educate catering businesses about the risk factors, including the development of a template-like tool to assist businesses to write their own food safety programs. DAA also recommends that a concurrent program be designed for community or charitable fundraising events using the existing fact sheets referred to in 12.1.2. The effectiveness of such education programs should be evaluated.