



14 August 2008  
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c/- Ipswich City Council  
PO Box 191  
IPSWICH Q 4305

Phone: 07 3810 7733  
Fax: 07 3810 6730  
Email: [contact@ulga.qld.gov.au](mailto:contact@ulga.qld.gov.au)

ABN 56 313 355 779  
[www.ulga.qld.gov.au](http://www.ulga.qld.gov.au)

The Hon. Stephen Robertson  
Minister for Health  
GPO Box 48  
BRISBANE QLD 4001

Dear Minister

**Re: Food Safety Program Auditors under the *Food Act 2006***

At the annual conference of the Urban Local Government Association of Queensland held recently in Gympie members resolved that representations be made to the State Government seeking amendment to the requirements for eligibility for approved Food Safety Auditors under the *Food Act 2006*, to recognise the food safety elements of all tertiary courses accredited by Environmental Health Australia for Environmental Health Officers, as being suitable to allow graduates of such courses to apply for accreditation as a Food Safety Auditor.

Provisions under the *Food Act 2006* (the Act) relating to Food Safety Programs for food businesses have now commenced.

Licensed food businesses are required to have an accredited food safety program from 1 July 2008, if:

- the food business involves off-site catering;
- the primary activity of the food business is on-site catering at the premises stated in the licence;
- the primary activity of the food business is on-site catering at part of the premises stated in the licence (eg. a function room used for on-site catering on the premises of a large hotel) catering to 200 or more people on 12 or more times per year.

Due to the fact that there are no approved auditors and the food safety templates have only recently been released by the state, Queensland Health has recommended that local governments now serve Improvement Notices on those businesses which have not complied, allowing until 5 October 2008 for compliance.

Unlike the food businesses above, the following food businesses will be required to have a Food Safety Program from 5 October 2008 -

- Where the food business is carried on as part of the operations of a private hospital under the *Private Health Facilities Act 1999*; or

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- Where the food business processes or serves potentially hazardous food for vulnerable populations including hospital patients, aged care recipients, children in child care centres and vulnerable people receiving other services such as meals on wheels.

Food businesses are required to submit their Food Safety Program to Council for accreditation. The accredited Food Safety Program must be regularly audited by an auditor approved under the Food Act for compliance with the program, the Act and the Food Standards Code. The first audit must be undertaken within six months of the program being accredited and thereafter, at a frequency decided by the local government.

To become an approved auditor, Local Government Environmental Health Officers, in addition to their recognised degree, are required to complete a Certificate IV in Health (Food Safety Programs and Auditing for Authorised Officers) to meet the competency standard.

Given the food safety content already included in Environmental Health Officers tertiary qualification (UG3), the impost of an additional five day certificate course is considered inappropriate by local government.

**Benefits** of no additional certificate training:

- Graduates of Environmental Health Officer courses approved by Environmental Health Australia (formerly AIEH) will automatically be eligible to apply for accreditation;
- More auditors will be approved and ready to implement the legislation;
- A decrease in the financial burden that local governments are facing in the additional training costs and loss of productive time;
- Provides auditors to smaller communities which would otherwise be required to pay costly third party auditors to service their region; and
- Still allows the legislation and its intent to be implemented - with concomitant improved food safety in the community.

**Disadvantages -**

- Nil apparent

Your consideration of the matter and advice in due course would be appreciated.

Yours sincerely

**P PISASLE  
PRESIDENT**