

Guidance on audits

Table of contents

Introduction	3
What is an audit?	3
Who carries out an audit?	4
What is checked in an audit?	4
Rating non-conformances	4
Critical defect – 64 points	5
Major defect – 8 points	5
Minor defect – 2 points	5
CAR escalation	5
How is the audit outcome determined?	6
Audit rating	6
Recommended enforcement action	6
Unacceptable audit outcome	6
Acronyms used in this document	8
Audit guidelines – key areas considered during an audit	9
General audit guidance	16
Meat processing facilities	23
UCFM manufacturers	27
Export registered meat facilities	29
Dairy processing	31
Export registered dairy facilities	33
Vulnerable populations	34
Seafood processing	36
Shellfish harvesting	37
Egg primary production	40
Licence conditions for the primary production of eggs – control of <i>Salmonella</i> Enteritidis	49
Egg processing	58
Export registered egg facilities	60
Plant products	61
Seed sprouts	70
RTE cut fruit, vegetables and herbs	73
Fruit, vegetables and herbs in oil	76
Unpasteurised juice	79
More information	82

Introduction

Audits are conducted on businesses with a licence from the NSW Food Authority. An audit assesses a business's Food Safety Program and compliance with the program, as well as any other requirements of the relevant food safety scheme set out in the NSW Food Regulation 2025 (the Regulation). This guidance document provides information on the ratings that may be applied to non-conformances when raised as Corrective Action Requests (CARs) during audits.

This document provides authorised auditors with a consistent approach for conducting audits at licensed food businesses. It can also be used by food businesses to understand the compliance audit model process, why defects are identified during audits, and their impact on food safety.

This guidance is based on the requirements of the Regulation, Australia New Zealand Food Standards Code (the Code) and industry specific standards identified below:

Meat transport vehicles, abattoirs, meat processors

- AS 4696:2023 - Hygienic Production and Transportation of Meat and Meat Products for Human Consumption
- AS 4465:2005 - Construction of Premises and Hygienic Production of Poultry Meat for Human Consumption
- AS 4466:1997 - Hygienic Production of Rabbit Meat for Human Consumption
- AS 5010:2001 - Hygienic Production of Ratite Meat for Human Consumption
- AS 4464:2007 - Hygienic Production of Wild Game Meat for Human Consumption

Australian Standards are available at www.publish.csiro.au.

Retail meat premises

- [NSW Standard for Construction and Hygienic Operation of Retail Meat Premises](#) (PDF, 380 KB)

Dairy processing facilities – pasteurisation

- [AS 3993-2003 - Equipment for the pasteurisation of milk and other liquid dairy products – Continuous-flow systems](#) (PDF, 96 KB)
- [ANZDAC – Australian Manual for the Validation and Verification of Heat Treatment Equipment and Processes](#) (PDF, 122 KB)

Shellfish

- [NSW Shellfish Industry Manual](#) (PDF, 653 KB)

This document does not provide industry specific guidance for the following industries licensed by the Food Authority: cold stores, knackereries, rendering plants, wild shellfish harvesters, food transport, or primary production businesses such as dairy, poultry, berries, leafy vegetables and melons.

What is an audit?

An audit is a process where an authorised auditor visits a facility to assess food safety compliance. During the audit the auditor inspects the facility, observes food handling practices, and reviews food safety documentation (including the food safety program and monitoring).

Who carries out an audit?

Audits on licensed business will be carried out by an auditor authorised by the *Food Act 2003* (NSW). There are 2 types of regulatory food safety auditors in NSW:

- auditors employed by the Food Authority, known as authorised officers, who are also authorised under the *Commonwealth Export Control Act 2020* to assess businesses registered for export
 - third party auditors authorised by the Food Authority to carry out regulatory food safety audits on its behalf. Only certain business types may use a third-party auditor, and they must have a suitable audit and compliance history.
-

What is checked in an audit?

During an audit, the auditor will check that:

- there is a food safety program
 - all food handling operations have been analysed to identify any critical food safety hazards and procedures are in place to control those hazards
 - there are descriptions of all products handled by the business
 - there are work instructions and procedures
 - there are monitoring forms
 - the business has a maintenance and construction process in place for structural issues which may pose food safety risks
 - the business has designated supervisors and workers responsible for specific jobs
 - there is a good manufacturing process – including hygiene, chemical storage, pest control, training, product recall, internal review and customer complaint handling procedures
 - the food business is complying with their food safety program and any relevant legislative requirements.
-

Rating non-conformances

The auditor has a list of areas that must be checked. If an area is not of an acceptable standard, the auditor will raise a Corrective Action Request (CAR). Auditors will take notes, photos and collect other information as evidence of both compliance and non-compliance with requirements. Other information and evidence may be gathered to give context and perspective to business operations which may feed into overall risk characteristics and ratings of CARs.

Each CAR is rated based on the risk and the impact or potential impact of the breakdown of food safety systems, either 'critical', 'major' or 'minor'. Points are allocated to each category and tallied to gauge overall system effectiveness. The rating and points allocated for each of the categories are outlined below.

When deciding what rating to apply to a non-conformance, an auditor will consider:

- the degree of food safety risk of the non-conformance; including food types, business size and distribution, consumer of the food (general or vulnerable population).
 - the overall standard of the facility, the food safety systems, and food safety culture of the business.
-

- overall compliance and non-conformance history of the business, for example, is it a recurring issue.
- the business's ability and attitude to taking corrective action in response to the non-conformance.

Critical defect – 64 points

A critical defect means a critical/serious breakdown in food safety systems that results in a failure to:

- a. comply with the requirements of a standard or legislative requirement that is very likely to result in, or has resulted in, the production of unsafe or unsuitable food; or
- b. comply with the requirements of the standards with regard to labelling or the trade description of food; or
- c. comply with Corrective Action Request for a major non-conformance within the stated time.

Defects that may fall into this category include:

- a severe breakdown in sanitation procedures
- waste facilities contaminating food, water or equipment
- use of water (including steam or ice) which is not potable in food handling areas
- serious pest infestation
- processed food submitted for sale that does not comply with product standards
- a breakdown in procedures specified in documentation or any non-compliance which will compromise the safety or wholesomeness of the food.

Major defect – 8 points

A major defect means a major/moderate breakdown in food safety systems that results in a failure to comply with the requirements of a standard and/or legislative requirements that is likely to result in the production of unsafe or unsuitable food or inaccurately labelled food but is not a critical defect. Defects that fall may into this category include:

- ineffective pest control, inadequate cleaning program
- unclean premises, equipment and food contact surfaces
- inadequate temperature control of food or ingredients during preparation or processing
- variation from the procedures documented, inaccurate calibration procedures
- any another defect which could compromise safety or suitability of processed food or result in inaccurately labelled food.

Minor defect – 2 points

A minor defect means a small/minor breakdown in food safety systems that results in a failure to comply with the requirements of a standard and/or legislative requirements that is less likely to result in the production of unsafe or unsuitable food or inaccurately labelled food.

CAR escalation

If a business fails to rectify any CAR or defect identified during an audit by the required timeframe, or the same issue is observed by an auditor at two consecutive audits, the CAR rating may be escalated. This means a minor will be escalated to a major, or a major escalated to critical. If the

failure to implement effective corrective actions is threatening food safety, auditors will use discretion and may escalate an issue directly to the critical category.

In addition, a further CAR or defect may be considered for inadequate corrective action, as the business has failed to implement effective corrective actions to rectify the original issue or prevent it from recurring.

The tables in the following section are guidelines for audits, based on existing knowledge and data, and are typically the main areas of risk to be aware of. It should be noted that these are guidelines only and intended to be used in conjunction with other available resources and the professional judgement and knowledge of the auditor.

How is the audit outcome determined?

At the conclusion of the audit, the allocated points are added to give a total rating for the business, from 'A' to 'E' (shown in Table 1).

Audit rating

Table 1. Determining audit results

Rating	Total allocated points	Audit results
A	0-15	Acceptable
B	16-31	Acceptable
C	32-47	Marginal
D	48-63	Unacceptable
E	64 and above	Unacceptable

Recommended enforcement action

The Food Authority will implement appropriate enforcement actions to control food safety risks. Possible enforcement actions are outlined below.

Unacceptable audit outcome

If critical non-conformances are identified during an audit, the auditor will record an unacceptable audit outcome and will obtain evidence such as photos, samples and recordings (interview) in order to implement appropriate enforcement action.

Enforcement action will be taken by an authorised officer, in accordance with the Department of Primary Industries and Regional Development's [Compliance and Enforcement Policy](#) (PDF, 2 MB). This may include, but is not limited to the following:

- **A verbal or written warning** – the business is warned that further non-conformance may result in further enforcement action being taken.
- **An Improvement Notice** - the business is given a period of time to fix a non-conformance before an authorised officer returns to check that the issue has been addressed and is compliant. The timeframe is determined by the authorised officer based on the food safety risks posed by the non-conformance and the expected time taken to rectify the issue. Timeframes can range from 24 hours up to 12 months. If the non-conformance/s is/are not rectified within the specified

timeframe, the authorised officer can issue a Penalty Notice and/or a Prohibition Order (see below). A fee is attached to all Improvement Notices to cover the expense of conducting a follow-up inspection to ensure the non-compliance has been rectified. Any additional inspections that may be required to verify compliance with an Improvement Notice will attract further costs.

- **A Penalty Notice** – the business is given a fine for the non-conformance identified during the audit. Fines range in severity depending on the nature of the offence and multiple fines may be issued. Fines are normally issued in conjunction with other enforcement actions to ensure that long term compliance with food safety standards is achieved. The business can also be placed on the Name & Shame register published on the Food Authority website.
- **A Prohibition Order** – this can be issued on a business where serious non-conformances are identified. This order means that the business cannot operate at all, produce a specific type of food, use a specific process, or use certain equipment, for a period of time. The period can range from 24 hours, up to permanent prohibition from operating. There is a fee associated with the issue of a certificate of clearance, to lift a Prohibition Order, payable at the time of the order being lifted.
- **Prosecution** – the Food Authority will commence legal proceedings against a business for continued failure to comply with food safety standards and/or failure to produce safe and suitable food. The business can also be placed on the Name & Shame register on the Food Authority website.

If a business records an unacceptable audit outcome, the Food Authority will conduct further audits, at full cost, until all food safety risks have been controlled and all enforcement actions have been successfully completed. The frequency of audits will be maintained at an appropriate level until the business is able to demonstrate their continued commitment to food safety and their ability to produce safe and suitable food.

Acronyms used in this document

AA	Approved Arrangement	MICoR	Manual of Imported Country Requirements
AO	Authorised Officer	MTC	Meat Transfer Certificate
AQL	Acceptable Quality Level	NATA	National Association of Testing Authorities
AS	Australian Standard	NLIS	National Livestock Identification System
AW	Animal Welfare	NSW	New South Wales
a_w	Water activity	NVD	National Vendor Declaration
AWO	Animal Welfare Officer	PGOs	Prescribed Goods Orders
CAR	Corrective Action Request	PR	Product Record
CPU	Central Processing Unit	RFP	Request For Permit
DAFF	Commonwealth Department of Agriculture, Fisheries and Forestry	PHF	Potentially Hazardous Food
ERP	Extended Residue Program	RTD	Resistance Temperature Detectors
EU	European Union	RTE	Ready-to-eat
FSC	Food Standards Code	SO₂	Sulphur dioxide (and derivatives)
FSO	Food Safety Officers FSP – Food Safety Program	SRO	Sydney Rock Oyster
FSSM	NSW Food Safety Schemes Manual	TC	Transfer Certificate
GMP	Good Manufacturing Practice	TD	Transfer Declaration
HTST	High Temperature Short Time	UCFM	Uncooked Comminuted Fermented Meat
ID	Identification	UV	Ultraviolet
MAP	Modified Atmosphere Packaging	VP	Vulnerable Populations
MHA	Meat Hygiene Assessment		

Audit guidelines – key areas considered during an audit

Table 2. Food safety requirements assessed during an audit by industry type

Facility type	Legal requirement	Food safety program required?	Food safety controls	Testing
Abattoir	AS4696 Red Meat AS4465 Poultry AS4466 Rabbit	Yes, drafted by business	<ul style="list-style-type: none"> • Carcase chilling (refer to relevant Australian Standard). • Temperatures: <ul style="list-style-type: none"> — Carcases no warmer than 7°C on surface. — Carcase parts no warmer than 5°C at site of micro concern. — During processing surface temp warmer than 7°C, or carried out in environment no warmer than 10°C. • Washing and chilling temperatures and residual chlorine in spin chillers (poultry). • Meat inspection. • Traceability 	<p>All – Water, as per FSSM.</p> <ul style="list-style-type: none"> • Verification: <ul style="list-style-type: none"> — Red meat – Carcase swabbing. — Poultry – Work surfaces (as part of Australian Standard) and carcase swabbing.
Meat processor	AS4696 Red Meat AS4465 Poultry	Yes, drafted by business	<p>Temperatures:</p> <ul style="list-style-type: none"> • Carcases no warmer than 7°C on surface. • Carcase parts no warmer than 5°C at site of micro concern. • During processing surface temp warmer than 7°C, or carried out in environment no warmer than 10°C. 	<ul style="list-style-type: none"> • Verification: <ul style="list-style-type: none"> — Work surfaces. • Product specific pathogens outlined in FSSM. • Validation: <ul style="list-style-type: none"> — Shelf life

Facility type	Legal requirement	Food safety program required?	Food safety controls	Testing
			<ul style="list-style-type: none"> • Cooking: 65°C for 10 minutes (or equivalent). • Cooling: <ul style="list-style-type: none"> — Cured meat is reduced from 52°C to 12°C within 7.5 hours; and 5°C within 24 hours of completion of cooking — Uncured meat is reduced from 52°C to 12°C within 6 hours; and 5°C within 24 hours of completion of cooking. • <i>Listeria</i> management processes for vacuum or MAP packed RTE meats. • Special requirements for UCFM processors (approval of each product subject to proforma). 	
Retail meat premises (butcher)	NSW Standard for Construction and Hygienic Operation of Retail Meat Premises	Yes, generic program drafted by NSW Food Authority (must be customised).	<p>Temperatures:</p> <ul style="list-style-type: none"> • Carcases and quarters no warmer than 7°C on surface. • Carcase parts no warmer than 5°C at site of micro concern. • During processing surface temp warmer than 7°C, or carried out in environment no warmer than 10°C. • Cooking: 65°C for 10 minutes (or equivalent). • Cooling: <ul style="list-style-type: none"> — Cured meat is reduced from 52°C to 12°C within 7.5 hours; and 5°C within 24 hours of completion of cooking. 	<ul style="list-style-type: none"> • SO₂ testing and sampling will be carried out by the AO on meat products (mince, sausages and other products). • Verification: <ul style="list-style-type: none"> — Product specific pathogens outlined in FSSM. • Validation: <ul style="list-style-type: none"> — Shelf life.

Facility type	Legal requirement	Food safety program required?	Food safety controls	Testing
			<ul style="list-style-type: none"> — Uncured meat is reduced from 52°C to 12°C within 6 hours; and 5°C within 24 hours of completion of cooking. • <i>Listeria</i> management processes for vacuum or MAP packed RTE meats. • Special requirements for UCFM processors (approval of each product subject to pro forma). 	
Dairy processor	<p>Food Standards Code 4.2.4 (processing), 3.2.2, 3.2.3 premises and practices.</p> <p>ANZDAC Guideline for Food Safety: Validation and Verification of Heat Treatment Equipment (including AS3993:2003 for HTST pasteurisation).</p>	Yes, drafted by business.	<p>Times and temperatures:</p> <ul style="list-style-type: none"> • Pasteurised milk products: 72°C for no less than 15 seconds. • Pasteurised milk for cheese: 64.5°C for no less than 16 seconds, and the cheese product stored at no less than 7°C for no less than 90 days. <p>OR equivalent validated time and temperature.</p> <p>Cooling milk products:</p> <ul style="list-style-type: none"> • Immediate cooling step, 5°C or below <p>OR</p> <ul style="list-style-type: none"> • cooling within two hours – from 60°C to 21°C; and within a further four hours – from 21°C to 5°C. • Raw milk cheeses: specific controls in Food Standards Code 4.2.4. 	<ul style="list-style-type: none"> • Antibiotic. • Water • Verification: <ul style="list-style-type: none"> — Pasteurisation verification (for example, P-nitrophenol, Flurophos, Charm. — Product specific pathogens outlined in FSSM. • Validation: <ul style="list-style-type: none"> — Shelf life.

Facility type	Legal requirement	Food safety program required?	Food safety controls	Testing
Seafood processor	Food Standards Code 3.2.2, 3.2.3 premises and practices.	Yes, generic program drafted by NSW Food Authority (must be customised).	<p>Temperatures:</p> <ul style="list-style-type: none"> Potentially hazardous food 5°C or below; or 60°C or above. Frozen food remains frozen. Pathogens control step is reasonably known to achieve the microbiological safety of the food (for example cooking, 65°C for 10 minutes or equivalent). Reheated food rapidly heated to a temperature of 60°C or above. Cooling, within two hours – from 60°C to 21°C; and within a further four hours – from 21°C to 5°C. Special traceability and temperature controls for oyster processing. 	<ul style="list-style-type: none"> Water Verification: <ul style="list-style-type: none"> Product specific pathogens outlined in FSSM. Validation: <ul style="list-style-type: none"> Shelf life.
Shellfish harvester	Food Standards Code 4.2.1 and NSW Shellfish Industry Manual.	Yes, generic program drafted by NSW Food Authority (must be customised and correct for activities such as harvest and hold).	<ul style="list-style-type: none"> All harvest must be carried out when area is in OPEN status. Date, time, and harvest area must be fully documented in Product Record (PR) book. Temperatures: <ul style="list-style-type: none"> Sydney Rock oysters: After depuration/harvest, stored at less than 25°C up to 72 hours and then placed at less than 21°C. Pacific oysters, native flat oysters, mussels and all other shellfish: After 	<i>E. coli</i> test to be carried out on shellfish once every calendar month in which a depuration is carried out.

Facility type	Legal requirement	Food safety program required?	Food safety controls	Testing
			<p>depuration/harvest, are placed at less than 10°C within 24 hours.</p> <ul style="list-style-type: none"> • Depuration must be carried out for a minimum of 36 hours. • Full documentation of relay (minimum 14 days), or translocation (minimum 60 days) if carried out. • Special traceability. 	
Vulnerable populations facility	<p>Food Standards Code 3.2.1</p> <p>Food Safety Program, 3.2.2, 3.2.3 premises and practices.</p>	Yes, drafted by business.	<p>Temperatures:</p> <ul style="list-style-type: none"> • Potentially hazardous food 5°C or below; or 60°C or above. • Frozen food remains frozen. • Pathogens control step is reasonably known to achieve the microbiological safety of the food (for example, cooking, 65°C for 10 minutes or equivalent). • Reheating food: rapidly heated to a temperature of 60°C or above. • Cooling: within two hours – from 60°C to 21°C; and within a further four hours – from 21°C to 5°C. <p>Cross contamination (texture modified foods, allergens).</p> <p>High risk foods and processes are controlled (for example fresh fruit and veg, eggs, <i>Listeria</i> controls).</p>	<p>Validation:</p> <ul style="list-style-type: none"> • Short and extended shelf life cook chill products

Facility type	Legal requirement	Food safety program required?	Food safety controls	Testing
Egg processor	<p>Food Standards Code 3.2.1</p> <p>Food Safety Program, 3.2.2, 3.2.3 premises and practices.</p> <p>Food Standards Code 4.2.5.</p> <p>Pasteurisation equipment as outlined in Chapter 6 of Food Safety Schemes Manual.</p>	Yes, drafted by business.	<ul style="list-style-type: none"> Pasteurisation as outlined in Food Standards Code 4.2.5. Times and temperatures: <ul style="list-style-type: none"> Heating: <ul style="list-style-type: none"> Egg pulp (without any sugar or salt): 64°C for 2.5 min, then immediately rapidly cooled. Liquid egg yolk: 60°C for 3.5 min, then immediately rapidly cooled. Liquid egg white: 55°C for 9.5 min, then immediately rapidly cooled. <p>OR equivalent validated time and temperature.</p> <ul style="list-style-type: none"> Cooling: <ul style="list-style-type: none"> immediately rapidly cooled to <7°C. OR within two hours – from 60°C to 21°C; and within a further four hours – from 21°C to 5°C (batch pasteurisation). <p>OR equivalent process to kill pathogenic organisms.</p> <ul style="list-style-type: none"> Identification and storage of cracked and/or dirty eggs. Egg declared on labelling (as an allergen). 	<p>Validation.</p> <ul style="list-style-type: none"> Water <p>Verification:</p> <ul style="list-style-type: none"> Product specific pathogens outlined in FSSM. <p>Validation:</p> <ul style="list-style-type: none"> Pasteurisation as outlined in FSSM.

Facility type	Legal requirement	Food safety program required?	Food safety controls	Testing
Fruit and vegetable processor (does not include primary processing of berries, leafy vegetables and melons)	Food Standards Code 3.2.1 Food Safety Program, 3.2.2, 3.2.3 premises and practices. Additional Food Authority requirements for seed suppliers and or seed sprout processors: <ul style="list-style-type: none"> seed supplier HACCP based FSP assessed by Food Authority pre-screening requirements for seed soaking alfalfa versus other seeds. 	Yes, drafted by business.	<ul style="list-style-type: none"> Construction and maintenance of facility is adequate for production of high risk RTE food. Adequacy of the hygiene program for production of high risk RTE food. Temperatures: <ul style="list-style-type: none"> Potentially hazardous food 5°C or below; or 60°C or above. Pathogens control step is reasonably known to achieve the microbiological safety of the food (for example sanitiser concentration, cooking/heat treating 65°C for 10 minutes or equivalent). Final product water activity and/or pH (fruit/veg/herbs in oil). Strong consideration of potential cross contamination risks. 	<ul style="list-style-type: none"> Verification: <ul style="list-style-type: none"> Seed and water testing product specific pathogens outlined in FSSM. Validation: <ul style="list-style-type: none"> Traceability (incoming raw ingredients and outgoing finished products).

General audit guidance

Table 3. General audit guidance across all industries

Category		Minor	Major	Critical
Food safety program	Licence		Licence permission incorrect for the business's activities (for example, other commodity, transport).	Licence permission incorrect for high-risk activities (for example, UCFM produced).
	Food safety program (FSP)	FSP has not been authorised by licensee of the business.	No monitoring records <1 month	No monitoring records completed >1 month
				No FSP available at audit.
		FSP has not been customised to reflect current operations (minor details missing/changed).	FSP has not been customised to reflect current operations with a major process missing/changed - not high risk/RTE product (similar process with similar controls).	FSP has not been customised to reflect current operations (significant/critical processes missing/changed), for example, addition of high risk/RTE product, new process with critical step.
			Hazards, control measures, or corrective action not sufficiently identified or monitored.	Hazards, control measures, or corrective action not sufficiently identified or monitored (significant food safety risk).
Hygiene and sanitation	Hygiene	The hygiene system failed to prevent minor or small number of hygiene issues.	The hygiene system failed to prevent a major or moderate number of hygiene issues, including food contact surfaces.	The hygiene system failed to prevent critical hygiene issues with significant visible matter/contamination observed on a large number of surfaces, fixtures, fittings and equipment, including RTE food contact surfaces.

Category		Minor	Major	Critical
		Hygiene and sanitation program and procedures not adequately documented.	The hygiene program did not identify and/or rectify hygiene issues observed.	
	High risk/RTE products			High risk food contact surfaces have not been cleaned or sanitised (slicer, RTE cutting boards, equipment, and RTE storage area).
Construction & maintenance	Construction & maintenance	The construction and maintenance system failed to prevent minor or small number of issues. Issues unlikely to contaminate food (walls, ceiling, floor, rails).	The construction and maintenance system failed to prevent major or moderate number of issues. Issues have increased likelihood to contaminate food.	The construction and maintenance system failed to prevent critical or significant number of issues. Issues pose an imminent food safety risk. No attempt has been made to rectify significant equipment or structural issues.
		Construction and maintenance program and procedures not adequately documented.	Construction and maintenance program did not identify and/or provide timely rectification of construction and maintenance issues.	
	Hand washing		Hand washing facilities are not provided with warm running water (temporary issue). Hand washing facilities are present however one of the following is not present: <ul style="list-style-type: none">• hand drying facilities• soap	Hand washing facilities are not present or are not easily accessible.
				Hand washing facilities are not operational.
				Hand washing facilities are not connected to or provided with warm running water.

Category		Minor	Major	Critical
			<ul style="list-style-type: none"> non-hand operated taps (meat business only). 	
Process control	Monitoring	Some monitoring records missing or incomplete < 1 week (low food safety risk).		
		The business has failed to rectify defects identified through monitoring.	Records do not reflect the condition of the premises (hygiene, maintenance and process records are not accurate).	
			No monitoring records <1 month	No monitoring records >2 months
	Cooking temperatures		No cook/cool records of non RTE products (pies, soups, casseroles etc.)	Cooking temperatures have not achieved 65°C for 10 minutes or equivalent.
				No cooking/drying records for RTE products
			Cooling verification records not carried out at frequency in the FSP.	No cooling verification records available.
				Cooked food products have not been cooled in accordance with the cooling requirements (or validated alternative).
				Storage equipment in facility is not functional and cannot maintain meat under temperature control.

Category		Minor	Major	Critical
	Ingredients		Products or ingredients/marinades are stored or being used after their use by date.	Products being sold or displayed for sale after the use by date.
	Cross contamination		Tubs on the floor, tub lids not closed, ingredient bags not sealed.	Significant food safety risk was identified.
			RTE products touching fixtures, fittings and not stored in a way that prevents cross contamination.	RTE products visibly contaminated by raw products or other contaminants.
			Business is not preventing cross contamination.	
			Strings/packaging unclean or not used or stored to prevent contamination.	
ID & and traceability	Disposal of food		Food for disposal is not held/kept separate or identified.	
	Traceability		The traceability program cannot ensure that all inputs, ingredients and outputs can be traced.	No batch coding in place for RTE food products.
	Recall		The business does not have a documented recall system (does not apply to retail businesses).	Recall system has not been effective in recalling unsafe food.
	Labelling		No Country of Origin labelling on packaged product.	Allergens not identified or declared on labelling.

Category		Minor	Major	Critical
			Important product information missing on packaged product (such as business name and address).	Date labelling altered/tampered on displayed product.
			No identification of ingredients and/or marinades on value added product.	
			No Nutrition Information Panel on value added product.	
Analytical & testing	Testing		Business has not conducted testing in compliance with their FSP/FSSM (pathogen verification testing, water) – 1 test missed. Testing reagents or equipment not within usable shelf life.	Business has not conducted testing in compliance with their FSP/FSSM – >2 tests missed.
		Business has not adequately documented testing.		Business failed to implement appropriate corrective action as a result of unacceptable test.
				Business has not conducted testing at a NATA- accredited laboratory.
				The facility has not notified the Food Authority of a failed test (verbal 24 hours, written 48 hours).
				Business has not conducted shelf-life testing/ pH testing/ water activity testing as outlined in the FSP.

Category		Minor	Major	Critical
Prerequisite programs	Calibration	Temperature measuring equipment has not been calibrated at frequency identified in the FSP.	Thermometer/pH meter has not been calibrated as outlined by manufacturer's instructions or at a minimum of every 12 months.	A thermometer is not operational or available.
	Pest control	Treatments not carried out as per the FSP, or no pest control treatments carried out for >6 months.	No pest control system (with no evidence of pests) or no pest treatment carried out for >12 months.	The pest control program has failed to prevent visible pest infestation or high levels of pest activity in facility: <ul style="list-style-type: none"> evidence of harbourage evidence of breeding failure to prevent entry of pests inadequate or no pest control programs evidence of droppings, smears.
		Some pest treatment reports missing or not sufficiently detailed (pests and areas treated, chemicals used).	No pest treatment reports available.	
	Internal audit		No internal audit conducted for >12 months.	
			Internal audit has not identified deficiencies in the food safety systems.	

Category		Minor	Major	Critical
	Good Manufacturing Practice (GMP)		No soap or paper towel available in facility.	
			No soap or hand drying available at hand wash.	
			Employee clothing unclean or damaged.	
			Hand wash basin not exclusively used for washing hands, arms and face.	
	Training	Staff not identified in the training matrix.	Staff are not competent in their duties.	Staff are not competent in the monitoring or documentation of CCPs.
	Allergens			Allergens not identified or controlled in processing.
	Chemicals		Unsuitable chemicals used in facility and/or not used per manufacturer instructions.	No cleaning chemicals available in the facility.
		Note: Readily available chemicals (pest control and cleaning) may be used as long as they do not contaminate food or food contact surfaces.		
Corrective actions	Approved suppliers	Approved supplier list/documentation not current.	Approved supplier list /documentation not available.	Suppliers are not approved or suitable.
	Previous CARs	Business has failed to document action taken against CARs raised during previous audit.	Business has failed to rectify MINOR CARs issued at previous audits.	Business has failed to rectify MAJOR CARs issued at previous audit.

Meat processing facilities

Table 4. Non-conformances - meat processing facilities

Category		Minor	Major	Critical
Process control	SO ₂			SO ₂ positive field test. Samples and enforcement action will be taken.
	Monitoring		Carcase cooling records incomplete.	No carcase cooling records.
	Temperatures	Temperature of raw product >5°C but <10°C above critical limit.	Temperature of raw product >10°C but <15°C above critical limit. Carcases loaded into transport >7°C quarters or larger, >5°C boxed meat or smaller than quarters.	Temperature of raw product >15°C above critical limit.
	RTE products		Temperature of RTE products 5°C -10°C.	Temperature of RTE products >10°C.
	Processing		Poultry wash water >18°C (single event/short time period during processing) (non-red meat facilities).	Poultry wash water >18°C (multiple event/extended time period during processing) (non-red meat facilities).
			Spin chiller water > 4°C (single event short time period during processing) (non-red meat facilities).	Spin chiller water > 4°C (multiple event/extended time period during processing) (non-red meat facilities).
			Carcases or carcase parts not chilled as outlined in the Australian Standard.	Spin chillers and/or washer do not have a detectable level of free residual chlorine (non-red meat facilities).

Category		Minor	Major	Critical
	Listeria management			Non-compliance with <i>Listeria</i> controls (such as post pack pasteurisation). Post pack pasteurisation temperatures not recorded.
ID & traceability	Cross contamination	Dressing controls failed to prevent contamination on carcase or carcase parts (not zero tolerance defects).	Dressing controls failed to prevent moderate contamination on carcase or carcase parts (including zero tolerance defects).	Dressing controls failed to prevent significant or large number of carcase or carcase parts being contaminated with zero tolerance defects.
		Staff not correctly sterilising knives.	Slaughtering and dressing not carried out in a manner which prevents contamination.	
	AQL/MHA		AQL/MHA system is not identifying and removing dressing defects (red meat facilities).	
	Meat inspection		Meat inspector not correctly applying inspection procedures or identifying diseases and contamination (red meat facilities).	
	Traceability		Condemned animals not documented (red meat facilities).	Animals slaughtered without a valid NVD or traceability information (red meat facilities).

Category		Minor	Major	Critical
	NLIS		Slaughter data not uploaded to NLIS database within 48 hours on one occasion (red meat facilities).	No data uploaded to NLIS database within 48 hours on multiple occasions (red meat facilities).
			ERP check not carried out on all cattle consignments (red meat facilities).	Animal with ERP status slaughtered and dispatched without system identifying and testing (red meat facilities).
	Labelling		Carcase or carcase parts not correctly branded or traceable.	Missing or stolen official marks not reported to the Food Authority within 24 hours.
			Inedible and pet food not correctly banded and labelled (red/yellow).	
Analytical & testing	Testing			<p>Dried meat products have not been tested for water activity levels</p> <ul style="list-style-type: none"> Jerky/Biltong - $<0.85 a_w$ Prosciutto/Speck/Coppa - $<0.92 a_w$.
Prerequisite programs	GMP	Staff not wearing hair and beard coverings.		
		Knife kits not clean or maintained free of rust or damage.		

Category	Minor	Major	Critical
	Training		No evidence of Stun, Stick and Shackle or AWO training or certification available during audit.
	Animal welfare (abattoir only)	Animal welfare controls not sufficiently documented.	Animals not humanely slaughtered.
			Incomplete or no animal welfare monitoring available.
		Animal holding areas not effectively maintained.	Staff observed abusing or mistreating animals. Animals not effectively restrained to allow for effective stunning. Animals not effectively stunned and insensible to pain at slaughter.
		Goads, restrain, stun and slaughter equipment not sufficiently maintained.	Stun, stick and shackle carried out by untrained operator.
		No notifiable disease procedure.	No AWO onsite during slaughtering (red meat facilities).

UCFM manufacturers

In NSW, businesses that produce Uncooked Comminuted Fermented Meat (UCFM) for sale must submit, with their licence application a production process pro forma, which details the ingredients and processing steps used to make the product.

Critical information collected in the pro forma is used to determine if a UCFM production process inhibits the growth of *C. botulinum*, is effective in reducing the numbers of *E. coli* to a safe level and to ensure that the process complies with other requirements outlined in Standard 4.2.3 of the Code.

When approved, a letter of approval for a specific product is issued to the licensee by the Food Authority. **The approval is specific to a distinct product with a specific diameter and a specific casing type**, for example Hot salami (65mm) with fibrous casing.

Please read the '*Manual for manufacturing uncooked comminuted fermented meat (UCFM) in NSW*' carefully – available on [the Food Authority website](#). Compliance with the Manual is a condition of licence for manufacturers of UCFM in NSW.

Table 5: Non-conformances - UCFM manufacturers

Minor	Major	Critical
		A product is made without an approved pro forma.
		A product is made without nitrite or nitrate.
		A product using novel meat (that is, a meat other than pork, beef or lamb) according to an approved pro forma is made, but the manufacturer does not follow the special conditions outlined in the approval letter.
A product is made with a different type of casing than the approved pro forma, but the diameter, ingredients, and fermentation & maturation process are following the approved pro forma.		<p>A product has been made in a way that is not according to the approved pro forma in terms of the:</p> <ul style="list-style-type: none"> • diameter • type & amount of meat & fat • type & amount of curing agent (nitrite/nitrate) • amount of salt • brand or type of starter culture

Minor	Major	Critical
		<ul style="list-style-type: none"> • amount of other ingredients • time & temperature of fermentation & maturation.
		<p>Missing or incomplete records for:</p> <ul style="list-style-type: none"> • raw meat traceability • compliance with special condition • specific batch monitoring • production.
	Business has not conducted testing in compliance with the FSSM – 1 test missed.	Business has not conducted testing in compliance with the FSSM – more than 2 tests missed.

Export registered meat facilities

Guidance for red and non-red meat industries is on the federal Department of Agriculture, Fisheries and Forestry (DAFF) website:

- Red meat – [Meat and Meat products](#)
- Non-red meat – [Australian Animal Welfare Standard and Guidelines for Poultry](#).

Table 6: Additional non-conformances for export registered meat facilities

Category		Minor	Major	Critical
Registration	Approved Arrangement (AA)	Organisation structure, responsibilities, authorities, and commitment to export legislation not documented.		
	Certificate of registration	<ul style="list-style-type: none"> • Certificate of registration does not have current personnel, processes, or country listing (if required). • RFP validators not currently on certificate of registration. • Importing country requirements not available for all countries exported to. 		
ID & traceability	Halal	Halal program is not sufficiently documented or audited (if required).	Halal and non-Halal meat not identified and segregated.	

Category		Minor	Major	Critical
	Meat Transfer Certificates (MTCs)	Not all MTCs reconciled (within 21 days).	MTCs not reconciled (within 21 days). MTCs have not been completed correctly, that is, product descriptions, weights, types of packaging chilled or frozen, etc. MTC has incomplete or incorrect market eligibility.	MTC signed by person not approved under AA.
	Official marks	Official marks not accounted for or reconciled weekly.	Official marks and marking devices (printers) not secure.	Missing or stolen official marks.
			Official marks and resemblances do not comply with PGOs.	Official marks on product not eligible for export (from non-export chain establishment/process).
Analytical & testing	Testing		Non-compliance with importing country testing requirements.	The facility has not notified the Food Authority and DAFF of a failed test (verbal 24 hours, written 48 hours).
		Water testing not carried out monthly (red meat facilities).	No corrective action taken in response to failed water test (no food safety risk evident).	No corrective action taken in response to failed water test (food safety risk evident or likely).
		Water testing not carried out quarterly (non-red meat facilities).		

Dairy processing

Table 7. Non-conformances - dairy processing

Category		Minor	Major	Critical
Process control	Monitoring			Continuous flow pasteuriser records missing or incomplete. Divert valves not checked daily on continuous flow pasteurisers (<1week).
				Batch pasteuriser records missing or incomplete.
				Head space temperatures not monitored.
	Temperature	Temperature of raw milk received >5°C without appropriate corrective action.	Temperature of raw milk received >10°C without appropriate corrective action.	Dairy products have not been heated in compliance with Food Standards Code requirements (Standard 4.2.4) - 72°C for 15 seconds for milk or 64.5°C for 16 seconds for cheese (or validated equivalent).
			Potentially hazardous food dispatched >5°C.	Dairy products have not been cooled in compliance with Food Standards Code requirements (Standard 4.2.4).
	Processing			Finished cultured products did not reach a pH <4.5.

Category		Minor	Major	Critical
				Dairy products not processed in accordance with AS 3993 and ANZDAC guideline requirements (monitoring, time/temperature, pressure differential, leak detection.
	Ingredients			Ingredients or cultures used after their use by date.
Analytical & testing	Testing			Pasteurisation validation not carried out on milk and cream, for example Phosphatase testing.
Prerequisite programs	Calibration			Thermometer has not been calibrated for 6 months (batch pasteuriser and other thermometers).
				Thermometers, RTDs, recording pens, pressure gauges and temperature gauges on the pasteuriser not available or operational at time of audit.
				Thermometers, RTDs, recording pens, pressure gauges and temperature gauges on the pasteuriser have not been calibrated in accordance with AS 3993 (HTST pasteurisation only).

Export registered dairy facilities

Guidance for export facilities is on the federal [Department of Agriculture Fisheries and Forestry \(DAFF\) website](#), and in the [Manual of Importing Country Requirements \(MICORe\)](#).

Table 8. Additional non-conformances for export registered dairy facilities

Category		Minor	Major	Critical
Registration	Approved Arrangement (AA)	Organisation structure, responsibilities, authorities, and commitment to export legislation not documented.	Significant change to AA or process has not been communicated to relevant authority.	
	Certificate of registration	Certificate of registration does not have current personnel, processes, or country listing (if required). Importing country requirements not available for all countries exported to.		
ID & traceability	Transfer Certificates/ Transfer Declarations		Transfer certificates not correctly completed. Transfer certificates not identifying country eligibility. Transfer certificates not available for incoming dairy ingredients.	
Analytical & testing	Testing		Non-compliance with importing country testing requirements (for example, bulk milk and pathogen testing every batch for EU).	The facility has not notified the Food Authority and DAFF of a failed test (verbal 24 hours, written 48 hours).
		Water testing not carried out monthly.	No corrective action taken in response to failed water test (no food safety risk evident).	No corrective action taken in response to failed water test (food safety risk evident or likely).

Vulnerable populations

Table 9. Non-conformances - vulnerable populations

Category		Minor	Major	Critical
Process control	Monitoring		No cooking records for 5 batches. No cooling verification records available for 5 batches.	No cooking records > 5 batches. No cooling verification records available for > 5 batches.
	Temperature	Temperature PHF received >5°C without appropriate corrective action.	Temperature PHF received >10°C without appropriate corrective action (discarding).	Food not cooled in accordance with requirements of the Code.
			PHF not stored at temperatures identified on manufacturer's label or hard frozen.	PHF stored out of temperature control (>5°C - <60°C) or safe alternative (2- hour/4-hour).
				Food not cooked or cooled for a validated time/temperature or alternative, for example extended shelf-life cook-chill.
	Processing		PHF not thawed under temperature control or safe alternative.	Business has not controlled the risks associated with high-risk foods (such as process, shelf life, <i>Listeria</i>).
				Vitamised food/nutritional supplements have not been maintained under temperature control.

Category		Minor	Major	Critical
				Vitamised food/nutritional supplements have not been made or used within validated shelf life.
				Vitamised food/nutritional supplements have not been sufficiently heat treated (or reheated).
	Ingredients	Food stored past the use by date applied by the business (that is, after opening or producing).		
Product ID & traceability	Labelling	Food not labelled as outlined in the FSP (for example, opened food).		
		Thawed food not labelled for use with 48 hours or thawing (or safe alternative).		

Seafood processing

Table 10. Non-conformances - seafood processing

Category		Minor	Major	Critical
Process control	Monitoring			Any receipt, processing or dispatch records for oysters missing.
	Temperature	Temperature of raw product 5-10°C.	Temperature of raw product 10-15°C. Temperature of RTE products 7-10°C.	Temperature of raw product >15°C. Temperature of RTE product >10°C.
	Cooking temperature		Cooking verification for crustaceans has not been carried out.	
	Cross contamination		Unopened oysters have excess mud, sediment or debris (with Improvement Notice to be issued on harvester).	
Product ID & traceability	Traceability	Unopened/incoming oysters do not have species, harvest date and location, storage conditions, and name and address of the business (either processor or supplier).	Opened or unopened oysters not identified with either batch or PR numbers.	

Shellfish harvesting

This guidance will be used when carrying out compliance audits triggered by shellfish harvest data submitted to the Food Authority.

Table 11. Non-conformances - shellfish harvesting

Category		Minor	Major	Critical
Food safety program	Licence		Licence permission incorrect for business's activities (for example, other commodity, transport).	Licence permission incorrect for business's activities (depuration harvest and hold).
	Food safety program			Incorrect or no FSP available at audit.
Process control	Monitoring	Estuary or zone not documented in PR book.	Time of harvest not documented in PR record (with no closures on that date).	Time of harvest not documented in PR record (with closures on that date).
				Date not documented in PR book.
			Depuration section incomplete - density and salinity not recorded.	Depuration section incomplete - times or dates not recorded.
			Destination section of PR record not completed – 5 occasions.	Destination section of PR record not completed – > 5 occasions.
			Relay or translocation not fully recorded.	Oysters not depurated for minimum 36 hours.
				Relayed oysters sold before 14 days in conditionally approved zone (in fully open status for 14 days).

Category		Minor	Major	Critical
				Translocated oysters sold before 60 days in conditionally restricted/approved zone.
	Temperature	Temperature records are not complete for oysters stored for >12 hours – 5 occasions.	Temperature records are not complete for oysters stored for >12 hours - > 5 occasions.	Oysters not stored under required temps (SRO <25, others <10).
	Cross contamination		Oyster bags/boxes not stored protected from contamination.	Oysters ready for sale (bagged) not sufficiently washed to remove mud.
			Direct harvest oysters not washed.	
ID & traceability	Traceability		Translocated or relayed oysters not identified on lease maps.	Oysters for sale not identified with PR numbers.
	Labelling	No Country of Origin, business name and address, species or storage conditions labels or bags.	No Country of Origin labelling on oysters for sale.	No harvest date and location on oysters for sale.
			No business name and address on oysters for sale.	
			No species on oysters for sale.	
			No storage conditions on oysters for sale.	
Analytical & testing	Testing		Depuration tank verification not carried out on first batch depurated after 3 months not using tank.	

Category		Minor	Major	Critical
Prerequisite programs	Calibration	Thermometer has not been calibrated as outlined by manufacturer's instructions or at a minimum of every 12 months.	Thermometer is not operational or available.	
		UV light life not documented.	UV light not operational at time of audit.	
	Chemicals		Unsuitable chemicals used in facility and/or not used per manufacturer instructions.	
		Note: Readily available chemicals (pest control and cleaning) may be used as long as they do not contaminate food or food contact surfaces.		

Egg primary production

Table 12: Non-conformances - egg primary production

Category		Minor	Major	Critical
Food safety program	Licence		Licence permission incorrect for business's activities (for example, additional activities such as grading or more eggs produced).	Licence permission incorrect for activities carried out at facility, for example egg processing (pasteurisation).
	Food safety program (FSP)	FSP has not been authorised by licensee of the business.		No FSP available at audit.
		FSP has not been customised to reflect current operations (minor details missing/changed).	FSP has not been customised to reflect current operations (major process missing/changed such as wet cleaning, storage/transport of cracked eggs for sale to egg processor).	FSP has not been customised to reflect current operations (significant/critical processes or control measures missing/changed, for example requirements of Schedule 8 of the Food Regulation 2025).
			Hazards, control measures, or corrective action not sufficiently identified or monitored.	Hazards, control measures, or corrective action not sufficiently identified or monitored (significant food safety risk).
			No documented procedure for wet cleaning of eggs.	Business not complying with safe wet cleaning procedures.

Category		Minor	Major	Critical
Hygiene & sanitation	Hygiene system	The hygiene system failed to prevent minor issues or small number of hygiene issues observed.	The hygiene system failed to prevent major issues or a moderate number of hygiene issues observed, including food contact surfaces.	The hygiene system failed to prevent critical hygiene issues observed with significant visible matter/contamination on multiple surfaces, fixtures, fittings and equipment.
	Nesting boxes/bird drinkers/feeders		Nesting boxes, drinkers and/or feeders were not maintained/clean.	Business has not stored, handled and/or disposed of waste (including sewerage, wastewater, litter, dead birds, garbage) in a manner to prevent eggs becoming contaminated or unsuitable.
	Spilt feed		Spilt feed not cleaned up effectively.	
	Egg equipment		Egg cleaning, grading, packing equipment unclean (non-food contact surfaces).	Egg cleaning, grading, packing equipment unclean with accumulated matter (food contact surfaces or non-food contact surfaces).
			Equipment used to transport eggs not maintained/clean to prevent contamination of eggs.	

Category		Minor	Major	Critical
	Hygiene program	Hygiene and sanitation program and procedures not adequately documented.	The hygiene program did not identify and/or rectify major hygiene issues observed.	The hygiene program did not identify and/or rectify critical hygiene issues observed.
Construction & maintenance	Construction & maintenance system	The construction and maintenance system failed to prevent minor, or a small number of issues observed. Issues unlikely to contaminate food (walls, ceiling, floor).	The construction and maintenance system failed to prevent major or moderate number of issues observed. Issues have increased likelihood to contaminate eggs.	The construction and maintenance system failed to prevent critical or significant number of issues. Issues pose an imminent egg food safety risk. No attempt has been made to rectify significant equipment or structural issues.
	Nesting boxes		Nesting boxes have not been constructed of materials that are smooth, sealed, impervious and able to be effectively cleaned and sanitised.	
	Construction & maintenance program	Construction and maintenance program and procedures not adequately documented.	Construction and maintenance program did not identify and/or provide timely rectification of construction and maintenance issues.	Egg packing or grading facilities have not been constructed in accordance with requirements of the Code, for example sheds do not comply.
Process control	FSP monitoring records	The business has failed to rectify defects identified through monitoring.	Records do not reflect the condition of the premises (hygiene, maintenance and process records are not accurate).	
			No monitoring records <1 month for example wet cleaning temperature and pH, storage temperatures for cracked eggs for sale to licensed egg processor.	No monitoring records completed >1 month for example wet cleaning temperature and pH, storage temperatures for cracked eggs for sale to licensed egg processor

Category	Minor	Major	Critical
			OR no monitoring records available for audit.
		No storage monitoring records for cracked eggs to be sold to a licensed egg processor.	Cracked eggs to be sold to licensed egg processor not stored or transported under 7°C.
		Note: See Table 13 for additional production area record keeping requirements under Schedule 8 of the Food Regulation 2025.	
	Bird drinking water/cleaning water	Bird drinking water and water used for cleaning is not safe and suitable.	
	Litter	Litter is not sourced, stored or used appropriately OR recycled litter is not appropriately treated.	
	Feed storage	Stock food not stored in a manner to prevent contamination.	Evidence of rodent contamination in stockfeed.
	Sick/injured/dead birds	Dead birds not removed from the growing shed daily. Increase in poultry mortalities had not been investigated.	Sick or injured birds not treated or culled daily

Category		Minor	Major	Critical
	Packaging not stored to prevent contamination		Packaging (egg cartons/egg flats) or plastic egg fillers used to transport eggs on premises not stored in a manner to prevent cross contamination.	Packaging (egg cartons/egg flats) or egg fillers used to transport eggs on premises visibly contaminated with evidence of rodent or wild bird matter (droppings).
	Vet medicines		Vet medicines not used and stored according to manufacturer's instructions.	
			Records not maintained to demonstrate observance of withholding periods for veterinary medicines.	
	Cracked eggs		Business is not preventing cross contamination between leaking eggs and intact eggs.	
			Cracked or dirty eggs for disposal not held/kept separate or identified.	
				Unauthorised sale of cracked/dirty eggs to persons or businesses other than licensed egg processors.
Product ID & traceability	Traceability program		The traceability program does not ensure that all eggs, inputs, and outputs can be traced.	Eggs not produced onsite received with no traceability information.
	Egg traceability			Sale of unstamped eggs without exemption.
				Not all eggs are uniquely identified.

Category		Minor	Major	Critical
	Recall		The business does not have a documented recall system.	Recall system has not been effective in recalling unsafe food.
	Labelling		No Country of Origin labelling on packaged product.	Incorrect production system on egg labelling for example free range instead of cage.
			Important product information missing on packaged product (such as business name and address).	Packaged eggs (in cartons or egg flats) are being sold unlabelled.
Analytical & testing	Testing		Business has not conducted testing in compliance with the FSSM (mandatory SE testing, water testing) with 1 test missed.	Business has not conducted testing in compliance with the FSSM with 2 + tests missed. COAs reported for Salmonella spp. and does not report whether Salmonella Enteritidis was detected.
		Business has not adequately documented testing program.		Business failed to implement appropriate corrective action as a result of an unacceptable test.
				Business has not conducted testing at a NATA- accredited laboratory.
				The facility has not notified the Food Authority of a failed test (verbal 24 hours, written 48 hours).

Category		Minor	Major	Critical
Prerequisite programs	Calibration: thermometers /temperature gauges	Temperature measuring equipment has not been calibrated at frequency identified in the FSP.	<p>Thermometer not calibrated at the frequency required by the FSP</p> <p>OR</p> <p>thermometer has not been calibrated in accordance with manufacturer's instructions</p> <p>OR</p> <p>thermometer has not been calibrated at a minimum of every 12 months.</p>	<p>A thermometer is not operational or available when wet cleaning is being carried out on site.</p> <p>pH meter not operational or available during wet cleaning.</p>
	Calibration: pH meter (when wet washing eggs with addition of chemical sanitiser, pH checks of wash water are required).		<p>pH meter has not been calibrated at the frequency required by the FSP.</p> <p>pH meter has not been calibrated as outlined by manufacturer's instructions.</p> <p>Buffers past expiry date.</p> <p>pH meter not being cleaned in accordance with manufacturer's instructions, for example distilled water.</p>	
	Internal audit		No internal audit conducted for >12 months.	
			Internal audit has not identified deficiencies in the food safety systems.	
	GMP		No soap or paper towel available at grading room hand wash basin.	

Category	Minor	Major	Critical
		Employee clothing unclean.	
		Grading room hand wash basin not exclusively used for washing hands, arms and face.	
	Training	Staff not identified in the training matrix. Staff are not competent in their duties. Staff not adequately trained to complete monitoring records. Staff training program has not identified training needs of staff.	
	Chemicals	Unsuitable chemicals used in facility and/or not used per manufacturer instructions.	No cleaning chemicals available in the facility.
		Note: Readily available chemicals (pest control and cleaning) may be used as long as they do not contaminate food or food contact surfaces.	
	Pest control	External pest control service report has not supplied information about chemicals used, pest activity observed on inspection of each bait station or corrective actions taken to control pests. External pest control service report not available for audit.	The vermin control strategy has failed to prevent visible pest infestation or high levels of pest activity in food handling/food storage or food packaging storage areas (egg packing/grading or packaging storage facilities): <ul style="list-style-type: none"> evidence of harbourage evidence of breeding failure to prevent entry of pests

Category		Minor	Major	Critical
				<ul style="list-style-type: none">• inadequate or no pest control programs• evidence of droppings, smears.
	Pest service reports	Some pest treatment reports missing or not sufficiently detailed (pests and areas treated, chemicals used).	No pest treatment reports available.	
		Note: See Table 13 for additional requirements for vermin control strategy under Schedule 8 of the Food Regulation 2025.		
Corrective actions	Previous CARs	Business has failed to document action taken against CARs raised during previous audit.	Business has failed to rectify MINOR CARs issued at previous audits.	Business has failed to rectify MAJOR CARs issued at previous audit.

Licence conditions for the primary production of eggs – control of *Salmonella* Enteritidis

Table 13: NSW Food Regulation 2025 Schedule 8 licence conditions

Category		Minor	Major	Critical
Production areas	Demarcation		Boundaries of production area(s) are not clearly demarcated.	
			No production area map, or map is inaccurate or has not marked all entrances into production area(s) which are available for use as an entrance.	
	Signage		Production area signage is not displayed at all entrances or is not clearly visible or legible.	No signage displayed.
				Signage does not include a statement that visitors entering production areas must contact licensee for permission before entering production area(s).
				No contact details on signage.
	Information for persons entering production area(s)		Insufficient information available to persons entering production area(s) on measures in place on the premises and production area(s) to control <i>Salmonella</i> Enteritidis.	No information available to persons entering production area(s) on measures in place on the premises and production area(s) to control <i>Salmonella</i> Enteritidis.
				No or unclear instruction on how to follow such measures in place on the premises and production area(s)

Category		Minor	Major	Critical
	Persons entering production area(s)			Persons have entered the production area(s) without permission from the licensee/person in charge.
				Persons entering production area(s) without agreeing to comply with Salmonella Enteritidis control measures in place on the premises.
				Persons have not followed Salmonella Enteritidis control measures in place on premises.
Footwear, hands and vehicle controls	Footwear controls		Insufficient number of shed boots or single use boot covers OR shed boots not maintained in clean condition or boot covers are not single use.	No footwear controls in place.
			Boot cleaning: No device to enable the scraping of soles of boots to remove organic matter.	Boot cleaning: no footbath in place at all entrances to production area(s).
			Boot cleaning: concentration of disinfectant in footbath not effective for disinfection of boots or manufacturer's instructions for disinfectant not followed.	

Category	Minor	Major	Critical
		Boot cleaning: footbaths not inspected daily and maintained to ensure effective disinfection.	
		Footbaths are not being inspected daily to ensure disinfection chemical is sufficient.	Concentrations of disinfection chemical not inspected and maintained with footbaths observed with significant amount of accumulated organic matter.
		Shed boots or boot covers worn outside the production area(s).	Persons not complying with footwear controls (use of footbaths, shed boots or single use boot covers).
		No bin for disposal of single use boot covers on exit from the production area or bin not used to dispose of used boot covers.	
	Hand washing/hand sanitising controls		No hand washing facilities or hand sanitiser stations in place.
		Hand washing facilities are not equipped with single use paper towel.	Hand washing facilities are not equipped with soap and water.
			Persons have not complied with hand washing or hand sanitising requirements on entry to and exit from production area(s).
	Vehicle controls		No wheel wash station for vehicles entering production areas OR

	Category	Minor	Major	Critical
				wheel wash station not able to be operated OR wheel wash station does not provide soap or detergent and equipment for effective removal of organic matter from wheels, wheel arches and footsteps.
				No parking available for vehicles not entering the production area(s) outside the production area(s).
				Vehicles entering or exiting production area(s) or exiting the premises without complying with vehicle controls for example not using vehicle wash stations or soap/detergent to adequately remove organic matter from wheels, wheel arches and footsteps.
Vermin control strategy	Vermin control strategy documentation and implementation		No documented vermin control strategy.	Evidence of rodent activity observed in egg packing/grading areas.
			Vermin control strategy not adequately implemented on the premises with no activity observed.	Vermin control strategy not effective with significant pest activity in poultry housing OR evidence of pest and vermin activity likely to contaminate eggs.
	Control of pest entry		Business has not taken all practical measures to construct poultry housing	Business has not taken all practical measures to prevent rodent entry or harbourage in egg handling/grading areas for example gaps observed in floors, walls

Category	Minor	Major	Critical
		sheds that prevent rodent entry or harbourage.	or ceilings or around windows/doors/conveyors into egg handling/grading area(s).
		Business has not taken all practical measures to construct poultry housing sheds that prevent rodent entry or harbourage.	Feed storage areas or litter storage area observed with rodent infestation.
	Bait stations	Bait stations are not numbered.	Bait stations not located to ensure they are not accessible to poultry.
		No bait station map or existing map does not include or correspond to bait station numbers.	No bait stations or insufficient bait stations placed around the production area(s) to control rodents.
	Control of pest harbourage in and around production area(s)		Bait stations not checked regularly, insufficient bait to control rodents or fresh baits not laid when bait stations are empty.
		Business has not prevented the vermin harbourage in the production area(s).	
		3m buffer zone free from potential vermin habitat (such as overgrown grass/vegetation/stored debris or stored items) around the perimeter of the production area not maintained as far as practicable.	

Category	Minor	Major	Critical
Records		Records are not being completed for all actions taken to comply with the vermin control strategy.	No records of actions taken to comply with vermin control strategy.
		Records not kept of each bait station inspection or records have not identified when there has been rodent activity.	
Control of pest and wild bird entry		Business has not taken all practicable measures to prevent entry of wild birds into poultry housing, egg packing, egg grading and/or packaging storage areas.	
		Business has not taken all practicable measures to limit vermin access.	
		Gaps are not sealed as far as practicable to prevent vermin access or harbourage.	
		Areas of vermin harbourage identified at time of audit.	
			Evidence of vermin or wild bird contamination on egg equipment in egg packing and or grading areas.
		Packaging was not stored in a manner to prevent contamination from vermin or wild birds.	Evidence that egg packaging has been contaminated by vermin or wild birds.

Category		Minor	Major	Critical
	Feed and litter storage controls		Business has not taken all practical measures to prevent wild birds accessing feed and/or litter storage vessels/areas.	
			Business has not taken all practical measures to limit vermin access to egg packing facilities, egg grading facilities, feed storage, packaging storage, litter storage and grading facility buildings.	Evidence that stored feed or litter has been contaminated with vermin or wild bird infestation.
			Business has not taken all practical measures to prevent harbourage of vermin in feed/litter storage areas.	Feed in poultry housing facilities observed contaminated by wild birds or vermin.
	Dead bird storage and disposal controls		Dead birds are not stored in a manner to prevent vermin or other animal access.	
			Dead birds are not disposed of in a manner to prevent vermin or other animal access.	
Production area records	Persons		Incomplete records for persons entering production area(s) OR Records of persons entering production area(s) not completed for 1 month.	No records of dates/persons who have entered production areas or records not kept for 2 years, or records of persons entering production area(s) not completed for > 1 month area(s).
				Records for persons entering production area(s) not kept on site for 2 years.

Category	Minor	Major	Critical
Deliveries and removals		Monitoring records for deliveries into and/or removals out of production area(s) not made or obtained within 1 month.	Monitoring records for deliveries into and removals out of production area(s) not made or obtained for > 1 month OR no monitoring records completed for deliveries into/removals out of production area(s).
		Monitoring records for deliveries into and/or removals out of production area(s) did not include all required details for example, date of, nature and content of, the name of the person/business, the number plate of the vehicle for deliveries/removals into/out of the production area(s).	Monitoring records for deliveries into and/or removals out of production area(s) not kept for 2 years after the date of delivery or removal.
			No records of poultry purchase, sale and/or destocking OR records of poultry purchase, sale and/or destocking do not include dates, quantity of birds, names and addresses/PIC from where poultry was purchased/supplied from or sold/supplied OR records of poultry purchase, sale and/or destocking not kept available for 2 years.

	Category	Minor	Major	Critical
			Missing or incomplete poultry mortality records.	No records of poultry mortalities being kept or available for audit.
				Records not kept on site for 2 years.
Egg packaging	Cardboard egg cartons/flats			Cardboard egg flats and fillers not being heat sanitised as required if being used outside the network of premises.
	Plastic egg flats/fillers			Plastic egg flats and fillers are being used outside the network of premises without being disinfected before use.
	Pallets		Pallets are not being stored in a clean area or area that is potential rodent habitat.	Pallets are not being cleaned to remove all visible organic matter after each use when used outside of the network of premises.

Egg processing

Table 14. Non-conformances - egg processing

Category		Minor	Major	Critical
Process controls	Monitoring			Continuous flow pasteuriser records missing or incomplete (>1 week).
				Divert valves not checked daily on continuous flow pasteurisers (<1 week).
				Batch pasteuriser records missing or incomplete (>1 week).
				Head space temperatures not monitored (>1 week).
	Temperature			Egg products have not been heated in compliance with Food Standards Code requirements (Standard 4.2.5).
				Processed egg products (pasteurised) not stored under temperature control.
				Egg products have not been cooled in compliance with the Code (Standard 4.2.5) - rapidly <7°C or 60°C to 21°C in two hours and from 21°C to 5°C within a further four hours.
				Potentially hazardous food dispatched >5°C.
	Processing			Egg products not processed in accordance with NSW Food Safety Schemes Manual requirements

Category		Minor	Major	Critical
				(monitoring, time/temperature, pressure differential, leak detection (duo plate only)).
Prerequisite programs	Calibration			Thermometer has not been calibrated for 6 months (batch pasteuriser and other thermometers).
				Thermometers, RTDs, recording pens, pressure gauges and temperature gauges on the pasteuriser not available or operational at time of audit.
				Thermometers, RTDs, recording pens, pressure gauges and temperature gauges on the pasteuriser have not been calibrated in accordance with chapter 6 of the NSW Food Safety Schemes Manual.

Export registered egg facilities

Guidance for specific industries can be found on the federal [Department of Agriculture, Fisheries and Forestry \(DAFF\) website](#).

Table 15. Additional non-conformances for export registered egg facilities

Category		Minor	Major	Critical
Registration	Approved Arrangement (AA)	Organisation structure, responsibilities, authorities, and commitment to export legislation not documented.	Significant change to AA or process has not been communicated to relevant authority.	
	Certificate of registration	Certificate of registration does not have current personnel, processes, or country listing (if required). Importing country requirements not available for all countries exported to.		
ID & traceability	Transfer Certificates/ Transfer Declarations		Transfer certificates not correctly completed. Transfer certificates not identifying country eligibility. Transfer certificates not available for incoming egg ingredients.	
Analytical & testing	Testing		Non-compliance with importing country testing requirements.	The facility has not notified the Food Authority and DAFF of a failed test (verbal 24 hours, written 48 hours).
		Water testing not carried out monthly.	No corrective action taken in response to failed water test (no food safety risk evident).	No corrective action taken in response to failed water test (food safety risk evident or likely).

Plant products

Table 16. Non-conformances - all fruit/vegetable seed sprout processing

Category		Minor	Major	Critical
Food safety program	Licence		Licence permission is incorrect for business's activities (for example, other commodity, transport).	Licence permission incorrect for high-risk activities, for example processing RTE meat, seafood, shellfish, eggs without the additional licence permission(s).
	Exemption	Business does not have documentation of exemption in accordance with clause 123 of the Regulation, food safety risk mitigated.	Business does not have documentation of exemption in accordance with clause 123 of the Regulation, food safety not risk mitigated.	Business does not have documentation of exemption in accordance with clause 123 of the Regulation, food safety not risk mitigated, imminent risk. Finished plant products labelled non-RTE without the required exemption.
	Food safety program	FSP has not been authorised by licensee of the business.		No FSP available at audit.
		FSP has not been customised to reflect current operations (minor details missing/changed).		FSP has not been customised to reflect current operations (significant/critical processes missing/changed, for example addition of high risk/RTE product, new process with critical step).
				Hazards, control measures, or corrective action (CCPs) not sufficiently identified or monitored (significant food safety risk).
	CCP documented procedures			CCP procedures not documented or are inadequate to ensure CCPs are controlled.

Category		Minor	Major	Critical
	Non CCPs (support programs)	Support programs (pre-requisite programs) are documented but require updating (minor changes, low food safety risk).		Support programs (pre-requisite programs) not documented.
Construction & maintenance	Floors		Pooling water on floor in food processing area (moderate food safety risk).	Pooling of water in food processing area with significant food safety risk.
		Floors, walls, ceilings damaged in non-food processing areas (low food safety risk).	Moderate damage to sealed floors in facility for example, floor seal worn, floor is pitted or gaps/cracks observed (moderate food safety risk).	Floors do not comply with construction and maintenance requirements and/or are significantly damaged (significantly worn or no floor seal, significant pitting, gaps and/or cracks in floors in food processing areas (high food safety risk)).
	Walls & ceilings	Walls and/or ceilings damaged in non-food processing areas (low food safety risk).	Walls and ceilings are sealed, impervious, smooth and able to be cleaned however, there is moderate damage to floor with moderate food safety risk.	Walls and ceilings do not comply with construction and maintenance requirements, for example not sealed, or impervious.
	Fittings and fixtures			Fittings and fixtures are damaged or unable to be effectively cleaned, providing significant foreign matter or bacterial harborage risk, and are in close proximity to food areas and may cause contamination.

Category		Minor	Major	Critical
	Equipment	Non-food equipment is damaged and unable to be effectively cleaned (low food safety risk).	Non-food contact surfaces of food equipment are damaged and unable to be effectively cleaned.	Food contact surfaces of food equipment are damaged, for example providing bacterial harborage or foreign matter risk to food. Food contact surfaces of equipment are unable to be effectively cleaned.
	Hand washing		Hand washing facilities are present, however, there are not soap or hand drying facilities/paper towels available.	Hand washing facilities are not present or are not easily accessible.
				Hand washing facilities are not operational.
				Hand washing facilities are not connected to or provided with warm running water.
Hygiene & sanitation	Hygiene	The hygiene system failed to prevent minor hygiene issues or a small number observed.	The hygiene system failed to prevent moderate number of hygiene issues including unclean food contact surfaces without accumulated visible matter able to be effectively cleaned at time of audit.	The hygiene system failed to prevent critical hygiene issues observed with significant visible matter/contamination on fixtures, fittings and equipment, including RTE food contact surfaces.
				High risk food contact surfaces have not been cleaned and sanitised.

Category		Minor	Major	Critical
	Program/ procedures	Hygiene and sanitation program/ procedures not adequately documented or require updating (low food safety risk).	Hygiene and sanitation program/procedures not adequately documented or require updating (moderate food safety risk).	No or ineffective hygiene and sanitation procedures documented.
		The hygiene program did not identify/rectify minor hygiene issues at the facility.	The hygiene program did not identify and/or rectify moderate hygiene issues with accumulation of visible matter on food and/or non-food contact surfaces.	The hygiene program did not identify and/or rectify significant hygiene issues identified with accumulation of visible matter on food and non-food contact surfaces.
Process control	Monitoring records		CCP monitoring records incomplete or missing (≤ 3 batches).	CCP monitoring records incomplete or missing (> 3 batches).
			The business has failed to rectify defects identified through monitoring.	Monitoring records indicate critical limits not met with no or insufficient corrective actions recorded.
				Records to not reflect the actual conditions at the facility (hygiene, maintenance, and process records are not accurate).
	Processing		Critical limits observed not being met in compliance with the FSP at time of audit with corrective action carried out but not recorded.	Critical limits observed not being met in compliance with the FSP at time of audit with no or insufficient corrective action carried out.

Category	Minor	Major	Critical
	Ingredient suitability /safety		Raw ingredients observed stored on site past the marked use-by date.
			Raw ingredients are not safe or suitable e.g. heavily soiled, perished or evidence of pest contamination
			Raw ingredients not stored to prevent cross-contamination or were not stored under temperature control (if applicable).
			Raw ingredients being used past the marked use-by date.
	Cooking temperatures		Products sold past the marked use-by date.
		Missing cooking records up to 5 batches missing.	No cook/cool records for RTE products or >5 batches missing.
		Cooling records/verification not completed to the frequency required by the FSP.	Cooked food has not been cooked to the required temperature with no corrective actions.
	Cross-contamination		No evidence of cooling records or verification (whatever is required by the FSP).
		Food containers on floor, food containers left open or uncovered, ingredient bags not re-sealed once opened.	Significant food safety risk identified.
			RTE products are not stored to prevent cross contamination with raw products.

Category		Minor	Major	Critical
				Business is not preventing cross contamination.
				Packaging is not stored to prevent cross contamination.
	PPE (if required by FSP)	There are inadequate controls in place to prevent contamination from clothing or footwear.	Staff have not complied with the FSP in relation to PPE/footbaths when required by the FSP.	PPE unavailable when required by FSP.
			Staff observed not wearing hairnets/beard covers or PPE as required by FSP (if applicable).	Footbath not maintained/sanitiser not made up to manufacturer's instructions.
Product ID & traceability	Traceability			Business is unable to trace raw ingredients to determine the immediate supplier.
				Business is unable to trace where finished products were sold (immediate recipient only).
				No batch coding in place for RTE products.
	Recall		No documented recall system in place.	Recall system has not been effective in recalling unsafe food.
	Food for disposal		Food for disposal not held/kept separate or identified.	

Category		Minor	Major	Critical
	Labelling		Packaged products are not labelled to the requirements of the Code.	Date labelling altered or tampered with.
				Allergens not declared on labels.
				Shelf life not marked on pre-processed foods.
Analytical & testing	Testing	Testing reagents or equipment not within usable shelf life, for example environmental swabs (if applicable), pH buffers.	Business has not conducted testing in compliance with their FSP/FSSM (pathogen verification testing, non-reticulated water) with 1 test missed.	Business has not conducted testing in compliance with their FSP/FSSM with >2 tests missed.
		Business has not adequately documented testing.	Business has not conducted testing at an approved laboratory.	Business failed to implement appropriate corrective action as a result of unacceptable test.
			Business has not conducted shelf life testing/pH testing/ water activity testing as outlined in the FSP.	The facility has not notified the Food Authority of a failed test (verbal 24 hours, written 48 hours).
Prerequisite programs	Calibration	Temperature measuring equipment (thermometers and gauges) have not been calibrated to the frequency required by the FSP.	Thermometer has not been calibrated as outlined by the manufacturer's instructions or at a minimum of every 12 months.	A thermometer is not operational or available.
				Automatic sanitiser dosing pumps/equipment have not been calibrated as required by the manufacturer's instructions/FSP.

Category	Minor	Major	Critical
			<p>pH meter has not been calibrated before each use.</p> <p>pH meter is not operational or available (if applicable).</p>
	Pest control	Treatments not carried out as per the FSP, or no pest control treatments carried out for >6 months.	<p>No pest control system (with no evidence of pests) or no pest treatment carried out for >12 months.</p> <p>The pest control program has failed to prevent visible pest infestation or high levels of pest activity in facility:</p> <ul style="list-style-type: none"> evidence of harborage evidence of breeding failure to prevent entry of pests inadequate or no pest control programs evidence of droppings, smears.
		Some pest treatment reports missing or not sufficiently detailed (pests and areas treated, chemicals used).	No pest treatment reports available.
	Internal audits	Internal audit has not identified deficiencies in the food safety systems.	No internal audit conducted for >12 months.
	Training	No training records available at time of audit.	Training gaps identified at time of audit.
			Staff observed not carrying out their duties in accordance with the requirements of the FSP, for example CCPs not controlled.

Category		Minor	Major	Critical
				Staff are not adequately trained in CCP monitoring
	Approved suppliers	Approved supplier list/documentation not current.	Approved supplier list /documentation not available.	Suppliers are not approved or suitable.
	GMP		No soap or hand drying available at hand wash.	No soap or paper towel available in facility.
	Allergens		Allergens not identified or controlled during storage and processing.	Allergen contamination identified at time of audit.
			Allergen management program not documented.	
	Chemicals		Unsuitable chemicals used in facility and/or not used per manufacturer instructions.	No cleaning chemicals available in the facility.
Corrective action	Previous CARs		Business has failed to rectify MINOR CARs issued at previous audits.	Business has failed to rectify MAJOR CARs issued at previous audit.

Seed sprouts

Table 17: Non-conformances - seed sprouts

Category		Minor	Major	Critical
Food safety program	FSP			<p>CCPs, critical limits and corrective actions not adequately identified or controlled including:</p> <ul style="list-style-type: none"> seed screening for every batch of seed delivered as per NSW FSSM sampling requirements seed soaking concentration (if applicable) sprout sanitising wash water concentration storage/dispatch of finished sprouts under 5°C.
	CCP procedures		<p>No documented procedures, however processing meets requirements for:</p> <ul style="list-style-type: none"> seed screening including correct sampling protocol seed soaking (if applicable) maintaining and checking wash water concentration. 	<p>Procedures not documented or are incorrect/inadequate with critical limits not met in relation to:</p> <ul style="list-style-type: none"> seed screening including correct sampling protocol seed soaking (if applicable) maintaining and checking wash water concentration.

Category		Minor	Major	Critical
Process control	Monitoring records		<p>Missing (≤ 3 batches) or incomplete records including:</p> <ul style="list-style-type: none"> • CCP monitoring records • records that demonstrate compliance with Food Authority requirements for all seeds including alfalfa seeds • seeds (including alfalfa) soaking records • Sprout wash water concentration • Storage temperature finished sprouts • Metal detector/x-ray (if applicable) • Dispatch temperature checks 	<p>Missing (> 3 batches) or incomplete or records including:</p> <ul style="list-style-type: none"> • CCP monitoring records • records that demonstrate compliance with Food Authority requirements for all seeds including alfalfa seeds • seeds (including alfalfa) soaking records. • Sprout wash water concentration • Storage temperature finished sprouts • Metal detector/x-ray (if applicable) • Dispatch temperature checks
				Monitoring records indicate critical limits not met with no or insufficient corrective actions recorded.
	Processing		Critical limits observed not being met in compliance with the FSP at time of audit with corrective action carried out but not recorded.	Critical limits observed not being met in compliance with the FSP at time of audit with no corrective action carried out.
				Seeds including alfalfa seeds have not been received from a seed supplier with an approved HACCP based FSP.

Category	Minor	Major	Critical
			Alfalfa seeds are not soaked in 20,000 ppm calcium hypochlorite for 10 mins or alternative scientifically validated method.
			Other seeds are not soaked in 2,000 ppm calcium hypochlorite for 10 mins other alternative scientifically validated method.
			Seeds are not stored to prevent contamination.
			Sprout wash water was not being checked in accordance with the requirements of the FSP.
			Sprout wash water concentration ineffective to kill bacteria of concern (no evidence of validation).
			Test strips are unavailable or past marked expiry date.
	Calibration		Automatic chemical dosing equipment for sanitiser soaking/wash water not calibrated according to manufacturer's instructions/frequency required by the FSP.

RTE cut fruit, vegetables and herbs

Table 18: Non-conformances - RTE cut fruit/vegetable/herb processing

Category	Minor	Major	Critical
Food safety program	FSP		<p>CCPs, critical limits and corrective actions not adequately identified or controlled including:</p> <ul style="list-style-type: none"> • storage of supplied pre-processed fruit/veg/herbs under 5°C • fruit/veg/herb sanitising wash water concentration • storage/dispatch of finished sprouts under 5°C.
	CCP procedures	<p>No documented procedures, however processing meets requirements for:</p> <ul style="list-style-type: none"> • pre-screening/trimming/culling of fresh produce (to remove produce that is heavily soiled or otherwise contaminated) • sanitising fruit/veg/herbs. 	<p>Procedures not documented or are incorrect/inadequate with critical limits not met in relation to:</p> <ul style="list-style-type: none"> • pre-screening/trimming/culling of fruit and vegetables • maintaining and checking wash water concentration.

Category		Minor	Major	Critical
Process controls	Monitoring records		<p>Missing (≤ 3 batches) or incomplete records including:</p> <ul style="list-style-type: none"> • CCP monitoring records. • pre-processed fruit/veg/herb receival records • fruit/veg/herb wash water concentration • fruit/veg/herbs receiving a pre-cook step not cooked to 65°C for 10 mins or equivalent • cooling records for fruit/veg that have received a pre-cook step to demonstrate cooling as per the requirements of the 2-hour/4-hour rule (from 60°C to 21°C in 2 hours and to 5°C or below within further 4 hours) • storage temperatures pre-processed fruit/veg/herbs and finished plant products • metal detector/x-ray (if applicable) • dispatch temperature checks. 	<p>Missing (>3 batches) or incomplete or records including:</p> <ul style="list-style-type: none"> • CCP monitoring records. • receival temperatures of pre-processed fruit/veg/herbs • fruit/veg/herb wash water concentration • fruit/veg/herbs receiving a pre-cook step not cooked to 65°C for 10 mins or equivalent • no cooking records for fruit/veg receiving a pre-cook step have not been cooled in accordance with the 2-hour/4-hour rule (from 60°C to 21°C in 2 hours and to 5°C or below within further 4 hours) • storage temperature finished products • metal detector/x-ray (if applicable) • dispatch temperature checks.
				Monitoring records indicate critical limits not met with no or insufficient corrective actions recorded.

Category	Minor	Major	Critical
Processing		Critical limits observed not being met in compliance with the FSP at time of audit with corrective action carried out but not recorded.	Critical limits observed are not being met in compliance with the FSP at time of audit with no corrective action carried out.
			Receival temperatures of pre-processed fruit/veg/herbs not checked to ensure <5°C.
			Fruit/veg/herb wash water was not being checked in accordance with the requirements of the FSP.
			Pre-cooked fruit/veg not cooked to 65°C for 10 mins or equivalent.
			Pre-cooked fruit/veg not cooled in accordance with the 2-hour/4-hour rule.
			Fruit/veg/herb wash water concentration ineffective to kill bacteria of concern (no evidence of validation).
			Test strips are unavailable or past marked expiry date.
Calibration			Automatic chemical dosing equipment for sanitiser soaking/wash water not calibrated according to manufacturer's instructions/frequency required by the FSP.

Fruit, vegetables and herbs in oil

Table 19: Non-conformances - fruit/vegetable/herbs in oil

Category	Minor	Major	Critical
Food safety program	FSP		CCPs, critical limits and corrective actions not adequately identified or controlled including: <ul style="list-style-type: none"> • storage of supplied pre-processed fruit/veg/herbs under 5°C • fruit/veg/herb sanitising wash water concentration • storage/dispatch of finished sprouts under 5°C.
	CCP procedures	No documented procedures, however processing meets requirements for: <ul style="list-style-type: none"> • pre-screening/trimming/culling of fresh produce (to remove produce that is heavily soiled or otherwise contaminated) • sanitising fruit/veg/herbs 	Procedures not documented or are incorrect/inadequate with critical limits not met in relation to: <ul style="list-style-type: none"> • pre-screening/trimming/culling of fruit and vegetables • maintaining and checking wash water concentration.
Process control	Monitoring records	Missing (≤ 3 batches) or incomplete records including: <ul style="list-style-type: none"> • CCP monitoring records • pre-processed fruit/veg/herb receival records • fruit/veg/herb wash water concentration 	Missing (>3 batches) or incomplete or records including: <ul style="list-style-type: none"> • CCP monitoring records. • receival temperatures of pre-processed fruit/veg/herbs • fruit/veg/herb wash water concentration • no cooking records/pasteurisation records (if applicable) • no cooling records (if applicable)

Category		Minor	Major	Critical
			<ul style="list-style-type: none"> no cooking records/pasteurisation records (if applicable) no cooling records (if applicable) storage temperatures pre-processed fruit/veg/herbs and finished plant products metal detector/x-ray (if applicable) dispatch temperature checks. 	<ul style="list-style-type: none"> storage temperatures pre-processed fruit/veg/herbs/finished products metal detector/x-ray (if applicable) dispatch temperature checks.
				Monitoring records indicate critical limits not met with no or insufficient corrective actions recorded.
	Processing		Critical limits observed not being met in compliance with the FSP at time of audit with corrective action carried out but not recorded.	Critical limits observed are not being met in compliance with the FSP at time of audit with no corrective action carried out.
				Receival temperatures of pre-processed fruit/veg/herbs not checked to ensure <5°C.
				Fruit/veg/herb wash water was not being checked in accordance with the requirements of the FSP.
				Fruit/veg/herb wash water concentration ineffective to kill bacteria of concern (no evidence of validation).
				Test strips are unavailable or past marked expiry date.
				Water activity is not verified (if applicable).

Category		Minor	Major	Critical
	Cooking temperatures			<p>Cooking temperatures have not achieved required kill step (for example, 65°C for 10 mins or equivalent).</p> <p>Pasteurisation fruit/veg/herbs in oil has not ensured product reaches 90°C for 10 mins (if applicable).</p>
	Cooling			<p>Cooked fruit/veg not cooled in accordance with the 2-hour/4- hour rule.</p>
	Calibration			<p>Automatic chemical dosing equipment for sanitiser soaking/wash water not calibrated according to manufacturer's instructions/frequency required by the FSP.</p>
				<ul style="list-style-type: none"> • pH meter calibration procedure not followed. • pH meter not calibrated before each use. • pH meter non-operational or no pH meter on site.

Unpasteurised juice

Table 20: Non-conformances - unpasteurised juice

Category		Minor	Major	Critical
Food safety program	FSP			<p>CCPs, critical limits and corrective actions not adequately identified or controlled including:</p> <ul style="list-style-type: none"> • storage of supplied pre-processed fruit/veg/herbs under 5°C • fruit/veg/herb sanitizing wash water concentration • storage/dispatch of finished sprouts under 5°C.
	CCP procedures		<p>No documented procedures, however processing meets requirements for:</p> <ul style="list-style-type: none"> • pre-screening/trimming/culling of fresh produce (to remove produce that is heavily soiled or otherwise contaminated) • sanitising fruit/veg/herbs. 	<p>Procedures not documented or are incorrect/inadequate with critical limits not met in relation to:</p> <ul style="list-style-type: none"> • pre-screening/trimming/culling of fruit and vegetables • maintaining and checking wash water concentration.

Category		Minor	Major	Critical
Process controls	Monitoring records		<p>Missing (≤ 3 batches) or incomplete records including:</p> <ul style="list-style-type: none"> • CCP monitoring records. • pre-processed fruit/veg/herb receipt records • fruit/veg/herb wash water concentration • storage temperatures pre-processed fruit/veg/herbs and finished juice products • metal detector/x-ray (if applicable) • dispatch temperature checks. 	<p>Missing (> 3 batches) or incomplete or records including:</p> <ul style="list-style-type: none"> • CCP monitoring records. • receipt temperatures of pre-processed fruit/veg/herbs • fruit/veg/herb wash water concentration • storage temperatures pre-processed fruit/veg/herbs/finished juice products • metal detector/x-ray (if applicable) • dispatch temperature checks.
				Monitoring records indicate critical limits not met with no or insufficient corrective actions recorded.
	Processing		Critical limits observed are not being met in compliance with the FSP with corrective action carried out but not recorded.	Critical limits observed are not being met in compliance with the FSP with no corrective action carried out.
				Receipt temperatures of pre-processed fruit/veg/herbs not checked to ensure $< 5^{\circ}\text{C}$.
				<p>Fruit/veg/herb wash water was not being checked in accordance with the requirements of the FSP.</p> <p>Fruit/veg/herb wash water concentration ineffective to kill bacteria of concern (no evidence of validation).</p>

Category		Minor	Major	Critical
				Test strips are unavailable or past marked expiry date.
	Calibration			Automatic chemical dosing equipment for sanitiser soaking/wash water not calibrated according to manufacturer's instructions/frequency required by the FSP.

More information

- Visit foodauthority.nsw.gov.au
- Contact the Food Authority helpline:
 - Email food.contact@dpird.nsw.gov.au
 - Phone 1300 552 406

© State of New South Wales through NSW Food Authority 2025. The information contained in this publication is based on knowledge and understanding at the time of writing October 2025. However, because of advances in knowledge, users are reminded of the need to ensure that the information upon which they rely is up to date and to check the currency of the information with the appropriate officer of the Food Authority or the user's independent adviser.