



The NSW Food Authority Annual Report 2003/2004

 NSW Food Authority





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Our Minister



The establishment of the NSW Food Authority marks a milestone in the State Government's six-year campaign to reduce foodborne illness in New South Wales.

The NSW Food Authority is Australia's first single agency responsible for food safety from harvest, paddock and catch right through to the consumer.

Estimates indicate foodborne illness costs the State more than \$765 million each year in loss of income and productivity. The NSW Food Authority will help reduce that cost by improving food regulations and helping the industry through better coordination, training and advice.

This agency will work to ensure industry compliance with national food standards, including labelling requirements, and will represent NSW in national policy and standards development. It will also educate consumers about food safety and labelling and respond to enquiries from industry, local government and the community about food regulation and safety issues.

In May 2004, the NSW Food Authority began a wide-reaching and successful campaign to ensure seafood retailers are correctly labelling imported seafood, including fish and prawns.

It has also implemented a crackdown on the practice of "fish substitution", where people deliberately or unintentionally substitute one species of fish for another.

I look forward to seeing the NSW Food Authority continue to develop its role as a national leader in food regulation and safety, to the benefit of industry and consumers throughout our State.

The Hon. Ian Macdonald MLC
NSW Minister for Primary Industries

Letter of Submission



31 October 2004

The Hon Ian Macdonald MLC
NSW Minister for Primary Industries
Level 30 Governor Macquarie Tower
1 Farrer Place
Sydney NSW 2000

Dear Minister

I am pleased to submit the Annual Report and consolidated financial statements of the NSW Food Authority and its private subsidiary corporations, Milk Marketing (NSW) Pty Limited and Pacific Industry Services Corporation Pty Limited for the year ended 30 June 2004.

The Report was prepared under the provisions of the Food Act 2003 and the Annual Reports (Statutory Bodies) Act 1984.

Yours sincerely

George Davey
Director-General

6 Avenue of the Americas, Newington NSW 2127
Postal Address: PO Box 6682, Silverwater NSW 1811 Tel: 02 9741 4777 Fax: 02 9741 4888
Industry and Consumer Contact Centre Tel: 1300 552 406 Fax: 02 9647 0026 Email: contact@foodauthority.nsw.gov.au
Internet: www.foodauthority.nsw.gov.au



Our Director-General

The creation of the NSW Food Authority represents the realisation of a vision to deliver substantially improved food safety outcomes for consumers

The NSW Food Authority was created on 5 April 2004 as the first state through-chain agency in Australia responsible for all aspects of food regulation. This represents the realisation of a vision long held by many in the food regulation field. The establishment of the NSW Food Authority creates a more streamlined, cost-efficient and effective food regulatory framework which will deliver substantially improved food safety outcomes for consumers. Bringing together a wealth of expertise in food regulation and safety, the Authority was created by merging SafeFood NSW with the food regulatory staff and resources of NSW Health.

The building blocks of change

The formation of the Authority was the culmination of four independent reviews over a five year period. These reviews investigated food safety regulation in NSW, nationally and overseas; considered funding models; critically assessed the operation of SafeFood; and recommended how best to integrate the NSW food regulatory system. It is pleasing to note that the recommendations of the Council on the Cost and Quality of Government and Section 73 Review reports have been substantially implemented as part of the establishment of the Authority.

A key recommendation of the Section 73 Review was to facilitate staff transfer through consultative change

management processes. The transfer of staff to the Authority was managed successfully through a joint consultative committee (JCC) formed between SafeFood and NSW Health and the Public Service Association and Health Services Union to share decisions and discuss issues. The work of the JCC was a vital contribution to successful establishment of the Authority and its effectiveness is measured by the support of the staff and unions in merging the two predecessor agencies.

It was important to secure the Authority's funding and this was negotiated before establishment in April. An amount of \$8.25 million, comprising the existing Government funding of SafeFood and an agreed amount covering the cost of transferring NSW Health staff was allocated to the Authority. An amount of \$1.23 million was transferred from the budget of NSW Health to the Authority to cover the cost of food testing services to be provided under a service agreement by the Department's Division of Analytical Laboratories (DAL). Further Government funding of \$890,000 was provided to complete the shellfish harvest area classification and \$1 million per annum over a two year period to introduce, in line with national requirements, food safety programs in high risk areas, including hospitals, aged care, childcare and catering facilities.

The establishment of the Authority also afforded a timely opportunity to realign industry funding. Industry charges, which had not increased since 2001, were linked to CPI movements in April 2004 to enable the Authority to meet cost increases over time.

A sound scientific foundation

The work of the NSW Food Authority is based on sound science. The keystone of our work is risk analysis. We use this methodology to assess, manage and communicate food safety hazards.

The work of the NSW Food Authority is based on sound science

Risk analysis, supported by scientific reviews, applied research projects and surveys, is how we target our efforts to manage risks and ensure that our food industry meets internationally recognised standards for food safety and labelling.

Minister Macdonald's initiative in late 2003 in establishing the Ministerial Scientific Advisory Council to oversee research efforts in his portfolio provided an opportunity to define the Authority's evolving science role. The Authority developed a Science Directions Paper to outline immediate research needs and to prioritise the scientific activities required to support food regulation. With its limited resources, the Authority's challenge in meeting its objectives in the science field will be to develop partnerships with recognised government, university and research organisations with expertise in areas relevant to the work of the Authority.

A strategic approach

The Authority enhances its capacity by collaborating with other agencies to regulate food safety in NSW. A Memorandum of Understanding (MoU) between the Authority and NSW Health and a service level agreement with DAL for laboratory services are both near completion. The MoU between the Authority and Department of Primary Industries will shortly be signed by the respective Directors-General. The MoUs with NSW Health and the Department of Primary Industries will define boundary responsibilities and cooperative procedures in the investigation of outbreaks of foodborne illness and managing on-farm aspects of food safety respectively.

Two-thirds of the State's food regulatory resources reside in local government. It is therefore vital that the Authority works effectively with local councils to manage food safety in the operations of the estimated 55,000 food businesses, including primary producers, in NSW.

A high priority for the Authority is to develop a new model for State and local government collaboration in food regulation. The Authority and local government are exploring a mandated and resourced role for local government within this partnership. Issues under consideration include defining the respective State and local government roles, funding, support and assistance to Councils and coordination by the Authority.



The regulatory framework

The Authority provides the regulatory framework for industry to produce safe and correctly labelled food. The framework is based on national standards and we place a lot of importance on contributing to the development of national food policies and standards, thereby ensuring their appropriateness for NSW.

The Authority is directly represented on the key national bodies and approximately 40 additional national working groups and committees associated with food regulation. This commitment represents a substantial investment in the national processes.

We implement national standards in NSW by introducing food regulations, including food safety schemes, which take account of local conditions.

The risk based process of developing regulations for specific sectors of the food industry commences with risk assessment and a baseline survey of each industry to gain a practical insight into how they operate. The most appropriate regulatory framework is then developed in consultation with industry and consumers. This would usually involve developing food safety program requirements or guiding standards such as a Code of Practice for that industry.

Studies are currently being conducted on eggs, various seafood sectors, plant products, goat dairies, intensive agriculture, hospitals and aged care facilities, childcare and catering businesses. All goat milk producers have now implemented food safety programs in line with new regulatory requirements. The draft Food Safety Scheme regulation for plant products has recently been circulated for public comment and a pilot project for the hospitals and aged care facilities has commenced.

To ensure successful implementation of our food safety schemes, we engage stakeholders in each industry in consultative committees to identify ongoing issues specific to their industry. Each committee includes an independent chair, representatives from the various sectors in the industry and a consumer representative. For example, a Meat

The most appropriate regulatory framework is developed in consultation with industry and consumers

Industry Consultative Council and a Seafood Industry Conference have been established to provide advice on our regulatory approach to these industries. The committees are also able to advise Minister Macdonald on industry developments and concerns.

A review of the structure and composition of the Dairy Industry Conference is currently underway and consultative committees will also be established for other industries as schemes near completion.

A strong community focus

The primary responsibility of the Authority is protection of public health. Consumer information and community education can improve public health by enabling “informed” consumers to reduce their exposure to food safety risks and make food choices which will improve their long-term health. As a first step to develop the Authority’s involvement in consumer information and community education, we have established a Consumer and Industry Contact Centre to handle public enquiries and complaints. In its first few months of operation, the Centre handled, on average, 165 calls per week. Approximately 50% of calls arose from regional NSW. Community access will be enhanced over the next year with programs involving ethnic communities. Consumer contact is further supported by tools such as the website, fact sheets and our involvement in key public events such as the Royal Easter Show.

Consumer information and community education is a key component of the food regulatory system and the Authority is committed to strengthening it into a strategic, collaborative and coordinated approach. Examples of strategies that may be used include introduction of food safety materials in the school curriculum, targeted risk communication campaigns and use of ‘state of the art’ educational materials. To this end, a comprehensive business case will be prepared for submission to Government which considers program design, development and delivery issues.

The Authority’s responsiveness to rural and regional communities will be strengthened by establishing shared offices with the Department of Primary Industries in Lismore, Coffs Harbour, Bathurst, Wollongong, Wagga Wagga, Dubbo, Albury, Queanbeyan and Taree (refer to Figure 8 on p24).

The primary responsibility of the NSW Food Authority is protection of public health

Protecting consumers

When food safety systems break down and individuals or businesses flout the law, our routine compliance work needs to be complemented by a robust program of surveillance, complaint investigation and incident response. Types of corrective action include food recalls, orders and directions to food businesses, licence suspension and cancellation, penalty notices and prosecutions.

During the past year, these powers have been used to protect consumers in response to a range of illegal or unsafe activities. For example, during the year, the Authority issued close to 900 orders or directions to individual businesses, required 72 businesses to show cause why their licences should not be suspended or cancelled and seized unsafe product on 56 occasions (for further details see Table 2 on p20).

The Authority has also acted to prevent consumer deception in the marketplace. In its first major campaign, the Authority cracked down on fish substitution where retailers or wholesalers duped consumers by

selling them incorrectly described or labelled product: for example, Nile Perch described as Barramundi or imported prawns being sold as local product.

A clear future

The Section 73 Review recommended that, within three months of its establishment, the Authority should convene a strategic planning workshop to set the strategic direction for the new agency. A workshop in May brought together a broad cross section of staff which developed a three year strategic plan for the Authority. Aligned with the budget cycle, the new plan will commence on 1 July 2004 and highlights eight key outcomes the Authority strives to achieve. The Strategic Plan is printed on p36, and maps a clear direction for the Authority to all stakeholders.

Acknowledgements

It’s important to note the many people and organisations that have helped turn the vision of a through-chain food regulatory agency into a reality. In particular, I would like to thank Minister Macdonald, who injected enormous energy and enthusiasm into the establishment of the Authority and whose strong leadership, drive and commitment continues to guide us; the former SafeFood Advisory Committee; valued stakeholders in industry, government, public health and consumer bodies and the scientific and research community; and the NSW Food Authority staff for their commitment, talent and dedication.

George Davey
Director-General

Our Highlights

Highlights for the NSW Food Authority for the year 2003/04 included:

- Establishment of Australia's first through-chain State food agency, the NSW Food Authority on 5 April 2004
- Successful merge of SafeFood NSW with NSW Health Food Branch and Public Health Unit food safety officers on 23 April 2004
- Enactment of the *NSW Food Act 2003* on 23 February 2004
- NSW Government funding announced on 22 June 2004 of \$890,000 in 2004/05 for the third phase of the shellfish harvest area classification program
- NSW Government funding announced on 22 June 2004 of almost \$2 million over two years (2004/05-2005/06) to help refine food safety programs for "high risk" sectors, as

part of national requirements. Funding has been allocated to help these sectors, including hospitals, aged care, childcare and catering facilities, meet national food safety program standards by 1 July 2007. The funding will also support the Authority in improving food safety management systems in other sectors

- Completion of the first phase of introducing food safety programs in the seafood industry with around 1000 commercial fishers and oyster processors trained in implementing food safety programs in 2003
- Establishment of a seafood industry consultative committee, representing NSW's \$90 million-plus commercial fishing industry
- Completion of six shellfish harvest area surveys at Nelson Lake, Corrie Island, three areas in Wallis Lake and Twofold Bay and release of the *NSW Aquaculture Shellfish Harvest Area Water Bacteriology and Phytoplankton Survey Data January 2003 - December 2003* reporting on the status of risk assessments completed or in progress for each of NSW's 137 shellfish harvest areas, representing a \$31 million industry producing 60% of Australia's oysters
- Completion of a baseline survey and code of practice for the goat dairy industry and inclusion of this industry in the *Food Production (Dairy Food Safety Scheme) Regulation 1999* as an industry regulated by the Authority

• Completion of a baseline survey, a draft regulation and a model food safety program for the plant products industry and establishment of an industry consultation group representing the 110 identified businesses operating in priority areas of this industry

- Completion of trial food safety audits in 20 hospitals and aged care facilities throughout NSW
- Establishment of the Food Regulation Partnership to explore with local government a mandated and resourced role for local government working in partnership with the Authority to regulate food in NSW and publication of its paper, *Toward A Strong Food Regulation Partnership* which addressed the issues of defining roles, recovering costs, providing support and assistance and coordinating frameworks across State and local governments involved in food regulation in NSW
- Investigation of fish substitution at 75 NSW seafood importers and wholesalers which found a high level of compliance, with 13 warnings issued but only two incidents relating to mislabelling of fish species
- Investigation of imported prawn labelling at 295 food businesses in NSW found that of the 221 businesses selling imported prawns, 121 (55 %) complied on first inspection with 100% complying on reinspection.

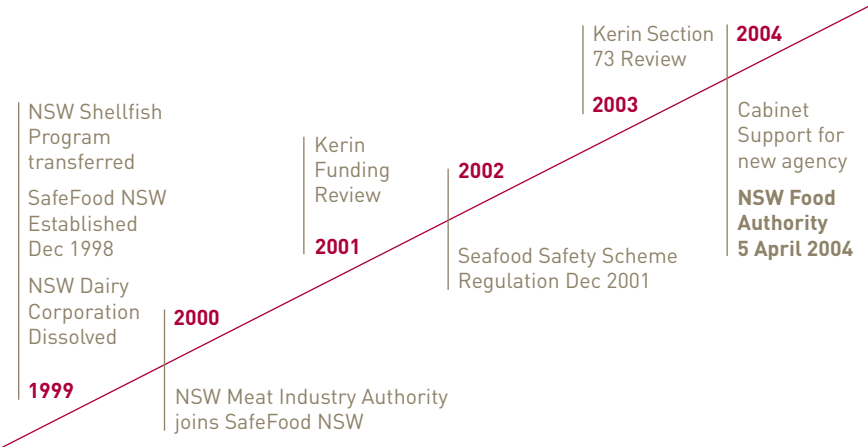


Our Organisation

Our Mission

To ensure that food in NSW is safe and correctly labelled and that NSW consumers are able to make informed choices about the food they eat

Figure 1: Evolution of an Agency



Our History

The Authority was established on 5 April 2004 by merging SafeFood NSW with the food regulatory activities of NSW Health. The Authority regulates all food industries in NSW and, in many cases, has introduced specific food safety scheme regulations. The Authority is responsible to the Minister for Primary Industries.

The NSW Food Authority is Australia's first completely integrated or 'through-chain' food regulation agency, responsible for food safety across the entire NSW food industry, from primary production to point-of-sale.

Our Role

The NSW Food Authority provides the regulation framework for industry to produce safe and correctly labelled food by:

- Contributing to national food policies and standards
- Establishing NSW regulations and food safety schemes
- Developing food laws in consultation with stakeholders
- Auditing, inspecting and enforcing food regulations

In 2003/04, the NSW Food Authority administered the following legislation:

- Food Act 1989 (repealed 23 February 2004)
- Food Act 2003 (commenced 23 February 2004)
- Food Production (Safety) Act 1998 (repealed 5 April 2004)
- Dairy Industry Act 2000
- Meat Industry Act 1978
- Food Regulation 2001 (repealed 23 February 2004)
- Food Regulation 2004 (commenced 23 February 2004)
- Food Production (Dairy Food Safety Scheme) Regulation 1999
- Food Production (Meat Food Safety Scheme) Regulation 2000

- Food Production (Seafood Safety Scheme) Regulation 2001
- Dairy Industry Conference Regulation 1999
- Meat Industry (Meat Industry Levy) Regulation 1999

The Authority also educates consumers on food safety by

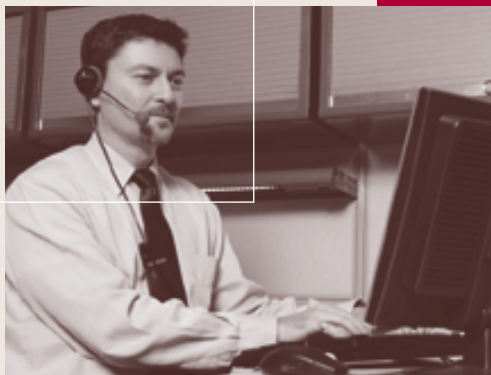
- Cultivating good food handling practices
- Sharing information on food safety
- Providing information on food labelling

The NSW Food Authority works with local government to enforce all aspects of the national Food Standards Code, the *NSW Food Act 2003* and the State's food safety schemes.

Food safety schemes target food safety risks throughout the food supply chain and are tailored to individual industries, sectors or businesses. The schemes incorporate national standards and are introduced by regulation under the Food Act.

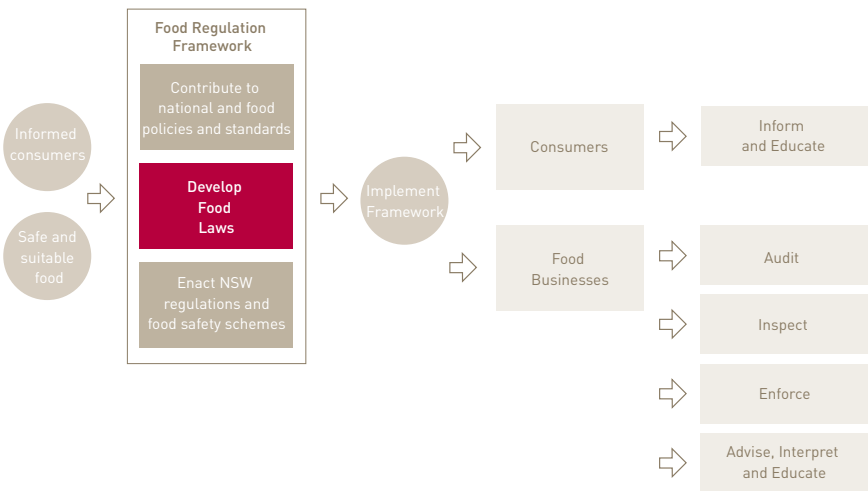
The NSW Food Authority ensures that industry complies with food safety schemes by licensing or receiving notifications of food businesses in NSW, auditing and inspecting their operations regularly and, where necessary, penalising non-compliance.

Case Study: Craig Morony, Manager Consumer and Industry Contact Centre



The Consumer and Industry Contact Centre was established to enable the NSW Food Authority to manage a broad range of incoming contacts by consumers and industry. The Centre began operating from 23 April 2004 when transfer of staff to the new Authority was complete and provides the first point of contact for many types of queries. The Centre aims to resolve calls at first point of contact or, when specialist food safety knowledge is required, to direct calls to the most appropriate Authority officer to manage. By end June, the Centre was receiving between 150 and 200 calls weekly, half of which originate outside Sydney. The Centre is resolving around 40% of queries at first point of contact (see Figures 5-7 on pages 22-23). Processes have been established to record the nature of queries and to respond immediately and effectively to breaking issues. Consumers and industry can contact the Authority by telephone on 1300 552 406, by fax at 02 9647 0026, email at contact@foodauthority.nsw.gov.au or by mail at PO Box 6682 Silverwater NSW 1811.

Figure 2: The NSW Food Authority Regulation Framework



Our Responsibilities

Before the Authority was established, responsibility for food regulation in NSW was divided across a number of State agencies. The establishment of the NSW Food Authority will create a more streamlined, consistent and efficient approach to food regulation in NSW and a single point of contact for both the industry and the public.

National responsibilities

The NSW Food Authority works to ensure the effective implementation of national food standards developed by Food Standards Australia New Zealand (FSANZ) on composition, labelling and contaminants, including microbiological limits for all foods produced or imported for sale in Australia and New Zealand.

State responsibilities

The NSW Food Authority values its vital links with other agencies at State and national levels, particularly NSW Health, the NSW Department of Primary Industries, the NSW Department of Environment and Conservation and the NSW Office of Fair Trading.

NSW Health remains responsible for the notifiable disease system and surveillance of foodborne disease, epidemiological investigation and joint response with the NSW Food Authority to foodborne disease, nutrition policy and health promotion activities.

The NSW Department of Primary Industries remains responsible for the control of animal and plant diseases and pests, livestock identification and traceability, stock foods, use of veterinary medicines and other products and fertilisers.

Local responsibilities

The Section 73 Review conducted by the Hon. John Kerin, which recommended the establishment of the NSW Food Authority, also recommended that the NSW Government explore with local government a mandated and resourced role for local government working in partnership with the Authority to regulate food in NSW.

This role is being developed through the Food Regulation Partnership, established in mid-2003, which comprises representation by the NSW Food Authority, the NSW Department of Local Government, NSW Health, the Local Government Association of NSW, the Shires Association of NSW, the Local Government Managers Association, the Australian Institute of Environmental Health and the Development and Environmental Professionals Association.

Our Management and Structure

Our management team comprises:

George Davey, Director-General



George leads the NSW Food Authority as its Director-General and reports directly to the NSW Minister for Primary Industries on all the Authority's activities which are directed at ensuring food in NSW is safe and suitable. George is a Fellow of the Australian Institute of Food Science and Technology Inc. and a Member of the Australian Society for Microbiology Inc. He holds a Bachelor of Science (Honours) and Master of Science degrees in Food Technology from the University of NSW.

Terry Outtrim, Executive Director Operations



Terry leads the Operations Branch which comprises work units for new industries, enforcement, operations and food safety programs. Food safety programs incorporate audit and compliance functions as well as regional operations, environmental operations (covering the NSW Shellfish Program) and the shellfish classification program. Terry holds a Diploma in Dairy Technology from Hawkesbury Agricultural College.

Terry says: *The role of the Operations Branch is to work proactively with food businesses to ensure highest food safety and hygiene standards and to enforce the requirements of the Food Standards Code. The Branch is focusing on identifying and managing high risk areas in food production and handling in NSW and will continue to lift standards to protect the food chain, meet consumer expectations and achieve world's best practice in foodborne illness investigation.*

Craig Sahlin, Executive Director Policy and Science



Craig leads the Policy and Science Branch which is responsible for advising on strategic direction, undertaking risk assessment and policy development, and coordinating changes to legislation, including the food safety scheme regulations. Craig holds a Bachelor of Arts (Honours) degree from Macquarie University and an LLB from the University of NSW.

Craig says: *The role of the Policy and Science Branch is to ensure that the NSW food regulatory framework is based on sound science and that the Authority's programs are well-targeted and effective. The Branch's priority is to lift the Authority's capacity to identify and respond to emerging issues. A major focus will be to analyse data collected from foodborne illness outbreaks and industry surveillance in order to target the Authority's risk management and risk communication programs.*

Stefan Fabiansson, Chief Scientist Policy and Science



Stefan ensures the NSW Food Authority's food safety management and regulatory approaches are based on sound science. Stefan is a Member of the Royal College of Veterinary Surgeons (UK) and a Member of the International Association for Food Protection (USA). He holds a Bachelor of Veterinary Science degree from the Swedish Royal Veterinary College and a PhD in Meat Science from the Swedish University of Agricultural Sciences.

Stefan says: *The Authority's activities are underpinned by sound science.*

The Chief Scientist coordinates the scientific effort across the Authority including horizon scanning and national collaboration. During the year, much effort will be directed into building links with universities to initiate joint activities covering emerging challenges to the safety of our food supply.

Sian Malyn, Director Finance and Licensing



Sian leads the Finance and Licensing Branch which is responsible for managing all of the NSW Food Authority's financial operations and issuing licences to over 13,000 primary production businesses in NSW. Sian holds a Bachelor of Business in Accounting from the University of Technology, Sydney.

Sian says: *The role of the Finance and Licensing Branch is to provide both strategic and day to day operational financial services, along with providing administrative services in relation to licensing. The Branch is focusing on establishing a secure, appropriate and sustainable funding base for the agency, improving efficiency and effectiveness through process improvement and increased implementation of electronic service delivery and related technology with a view to catering for increasing numbers of Food Authority licensee stakeholders.*

Samara Kitchener, Director Business Services



Samara leads the Business Services Branch which comprises human resources, records management, communications, strategic planning, the NSW Food Authority Consumer and Industry Contact Centre and other corporate functions. Samara holds a Bachelor of Science in Food Science and Technology (Honours) from University of NSW, a Graduate Certificate in Applied Science (Dairy Technology) from University of Melbourne and a Masters of Business Administration (Executive) from the Australian Graduate School of Management.

Samara says: *The Business Services Branch provides the Authority's corporate support infrastructure with responsibility for human resources, administrative support, information management and technology, records management, property management and procurement. The Branch is also responsible for the public interface of the Authority through communications and public relations activities, the new Consumer and Industry Contact Centre and the Customer Management System. Our challenge for the year 2003/04 was developing the systems, structures, corporate identity and branding, technology and accommodation needed to support the staff and responsibilities of the NSW Food Authority. The firm base we have built in achieving these goals will help us make sure our systems continue to robustly support the organisation and strengthen our public interface.*



NSW Food Authority Executive (L - R): Stefan Fabiansson, Craig Sahlin, George Davey, Samara Kitchener, Terry Outtrim and Sian Malyn.

The management team worked with the SafeFood Advisory Committee (SFAC), established under the *Food Production (Safety) Act 1998* until the Act was repealed on 5 April 2004, at which time the Committee ceased to operate.

The SFAC provided expert advice and made recommendations to SafeFood or the Minister on a wide range of matters relating to food or to the operation of the Act or its regulations. The Committee also advised on the making of regulations, particularly those prescribing food safety schemes.

The SafeFood Advisory Committee was appointed by the Minister and chaired by George Davey. Membership comprised Professor Ken Buckle of University of NSW; Dr Michael Eyles of Food Science Australia; Dr Gavin Frost of MBF; The Hon John Kerin AM; and Dr Heather Yeatman of University of Wollongong.

A Ministerial Advisory Committee is enshrined in the organisational structure of the NSW Food Authority and scheduled for establishment after 1 July 2004.

The NSW Food Authority is represented on several international and national bodies and officers participate in approximately 40 national working groups and committees associated with the national food regulatory system. Participation in these groups is as follows:

- *Australia New Zealand Dairy Authorities Standards Committee* (represented by C. Chan)
- *Australian Institute of Food Science and Technology, Federal Council* (represented by S. Kitchener) (ceased on 1 July 2004)

- *Australian Institute of Food Science and Technology, NSW Branch, Food Microbiology Group* (represented by E. Jansson)
- *Australian Shellfish Quality Assurance Advisory Committee* (represented by B. Nelan)
- *Dairy Industry Association of Australia (NSW Division) State Council* (represented by P. Sutherland and G. Davey)
- *Australia New Zealand Food Regulation Standing Committee* (represented by G. Davey)

Authority officers participate in nine (9) working groups of the Food Regulation Standing Committee.

- *National Association of Testing Authorities Australia Ltd Biological Accreditation Advisory Committee* (represented by G. Davey, Chair)
- *Food Safety Information Council* (represented by J. Keune)
- *Food Standards Australia New Zealand National Expert Panel for Uncooked, Comminuted Fermented Meat* (represented by C. Turney)
- *Food Standards Australia New Zealand Primary Production and Processing Standards Development Committee (Dairy)* (represented by C. Chan)
- *Food Standards Australia New Zealand Primary Production and Processing Standards Development Committee (Poultry)* (represented by S. Fabiansson)
- *Food Standards Australia New Zealand Primary Production and Processing Standards Development Committee (Seafood)* (represented by C. Chan)

Authority officers participate in eleven (11) advisory groups, working groups and committees of Food Standards Australia New Zealand.

- *Food Standards Australia New Zealand/Therapeutic Goods Administration Interface Officials Groups* (represented by M. Apollonov)
- *Implementation Sub-Committee* (represented by G. Davey, C. Sahlin)

Authority officers participate in seven (7) working groups of the Implementation Sub-Committee.

- *Industry Compliance Committee, Australian Fruit Juice Association* (represented by B. Porter)
- The NSW Food Authority is represented on several International Dairy Federation Standing Committees, including *Manufacturing Procedures: Microbiological Quality and Hygiene of Milk and Milk Products* (represented by P. Sutherland); *Marketing Microbiological Risk Management* (represented by G. Davey and P. Sutherland); and *Physico-chemical Methods of Analysis* (represented by C. Chan)
- *International Milk Promotion Group* (represented by G. Davey, President)
- *International Symposium on Problems of Listeriosis, Technical Program Committee* (represented by P. Sutherland)
- *Meat Standards Committee* (represented by G. Davey and D. Miles)
- *National Red Meat Advisory Committee, Verification Sub-Committee* (represented by P. Day)
- *Quality Society of Australasia, Food Safety Auditor Panel* (represented by E. Mulhearn)
- *Standards Australia FT-024-00-04 Food Microbiology Committee* (represented by P. Sutherland and G. Davey, Chair)
- *Standards Australia FT-024 Food Products* (represented by P. Sutherland and G. Davey, Chair)
- *Standards Australia FT-024-00-05 Dairy Products Committee* (represented by E. Mulhearn)
- *Standards Australia, Health and Food Sector Standards Board* (represented by G. Davey, Chair)
- *Standards Australia, Standards Development Board* (represented by G. Davey)
- *Technical Advisory Group* (represented by B. Porter, C. Chan)

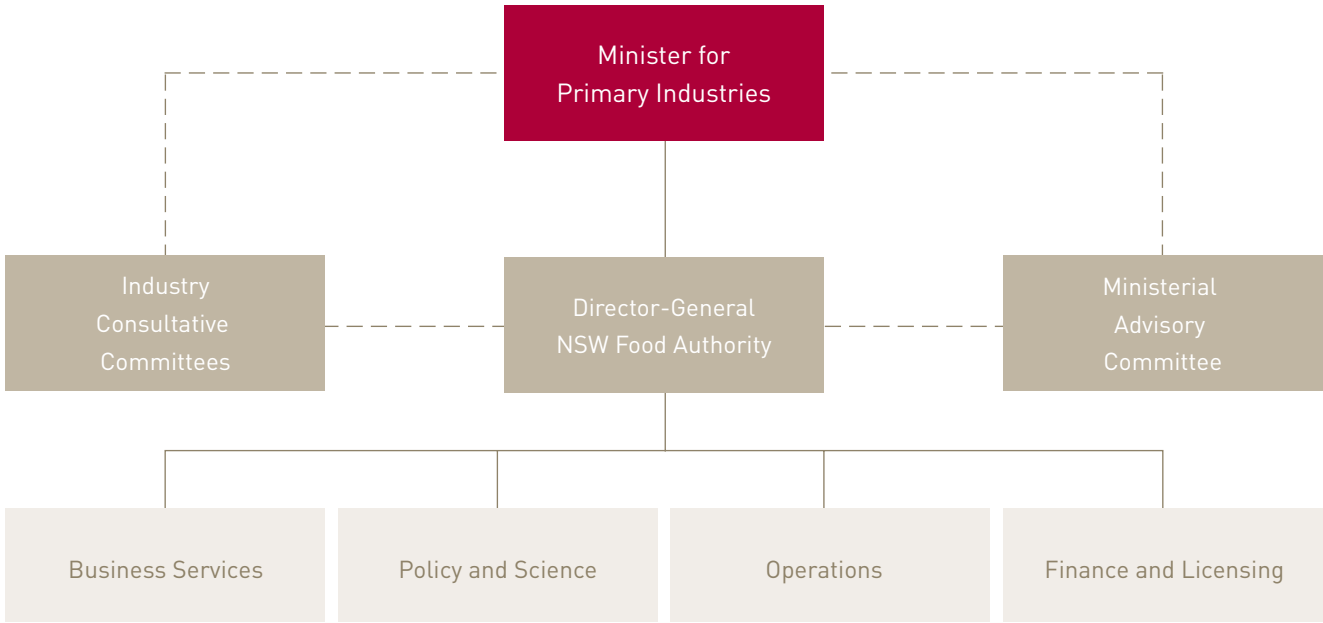
Authority officers participate in four (4) working groups of the Technical Advisory Group.

- *Therapeutic Goods Administration Complementary Medicines Complaint Resolution Committee* (represented by M. Apollonov)

The NSW Food Authority is represented on several NSW committees. Participation in these groups is as follows:

- *Meat Industry Levy Review Group* (represented by T. Outtrim)
- *Ministerial Science Advisory Council* (represented by S. Fabiansson)
- *NSW Dairy Industry Conference* (represented by T. Outtrim)
- *NSW Department of Primary Industries National Livestock Identification Scheme Advisory Committee* (represented by P. Day)
- *NSW Health Enteric Diseases Advisory Group* (represented by M. Tegel)
- *NSW Health Food Advisory Committee* (represented by C. Sahlin) (ceased on 5 April 2004)
- *NSW Health Public Health Emergency Management Sub-Committee* (represented by C. Chan)
- *NSW Interagency Advisory Committee on Gene Technology* (represented by C. Sahlin, C. Chan)
- *NSW Meat Chemical Residue Consultative Committee* (represented by D. Miles)
- *NSW Meat Industry Consultative Council* (represented by G. Davey and T. Outtrim)
- *NSW Seafood Industry Conference* (represented by G. Davey and T. Outtrim)
- *NSW Shellfish Committee* (represented by B. Nelan)
- *Peak Oyster Advisory Group* (represented by T. Outtrim and B. Nelan)
- *Review of Illegal and Black Market Fishing* (represented by T. Outtrim)
- *SafeFood Advisory Committee* (represented by G. Davey, Chair) (ceased on 5 April 2004)

Figure 3: Work areas of the NSW Food Authority



Our Key Result Areas

Under the SafeFood NSW Strategic Plan 2001 – 2004, the NSW Food Authority measures its performance against eight key result areas. These describe our primary objectives and the means by which we can judge the success of our operations. Each of the result areas is a milestone for the Authority to achieve its long term goal.

Our key result areas are:

- 1. Safe food to plate
- 2. Lead NSW food authority
- 3. Risk analysis implemented in all schemes
- 4. Community confidence and recognition
- 5. Uniform approach to all industries
- 6. Functionally aligned structure
- 7. Cooperative working relationships
- 8. Sustainable, knowledgeable and effective people resource

Figure 4: Strategic Plan 2001 – 2004

By December 2003

Scheme harmonisation & integration strategy

- Risk ranking system prepared
- Verification policy (including audit) determined
- Standard framework for fees and charges
- Licensing systems standardised
- Standard approach for scheme rollout

Transition to launch of NSW food agency

- Integrate SafeFood, NSW Health and transition strategic processes
- Relocation to Newington complete

Communication systems enhanced

- Feedback methods for external stakeholders
- Feedback methods for staff
- Communication between branches enhanced

Strategic human resource plan implemented

- Performance Management Development System (PMDS)
- Training plan aligned to agency needs
- Succession plan and recruitment strategy

Comprehensive, effective IT systems in place

- Roles and functions of Customer Management System (CMS) clearly defined
- Enforcement and Shellfish included in CMS
- CMS linked to records management system
- Procedure for ongoing maintenance and training
- Wireless technology incorporated
- Client – web interface established

Records management strategy implemented

Shared services strategy in place

2004 KPIs

- Food safety system (to plate) across all sectors
No system failures leading to foodborne illness
- s73 decision that SafeFood becomes the “relevant authority” under the NSW Food Act
Responsible for all parts of Food Standards Code
- Risk analysis completed for all high risk sectors
Resource allocation aligned to risks
Emerging risks monitored – “no surprises”
- Branding of all licensed premises & vehicles
Surveys demonstrate increased recognition
Customer service unit established
- Uniform operational processes implemented
Uniform cost recovery regime introduced
Consistency of processes confirmed by reviews
- New structure in place
Robust program-based accounting system
All operational staff multiskilled
- MoUs in place with key agencies
Stakeholder relationships demonstrated as “good”
Critical service level agreements met
- Staff profile enables succession
Competency measures across all roles met
Program plans on target

2004 Outcomes

- Safe Food to Plate
- Lead NSW Food Authority
- Risk Analysis Implemented in all Schemes
- Community Confidence and Recognition
- Uniform Approach to all Industries
- Functionally Aligned Structure
- Cooperative Working Relationships
- Sustainable, Knowledgeable & Effective People Resource

Strategic Pathways



Case Study:
NSW Food Authority
Newington Headquarters



In 2002, SafeFood NSW contracted to acquire land and construct a new head office at Newington to accommodate the organisation. This commitment anticipated the evolution of SafeFood NSW into a through-chain agency, as recommended in the Section 73 Review report submitted in December 2002 and was an important step in positioning the agency as the relevant authority for food safety in NSW. The Newington Relocation Committee was established in January 2003 to manage staff aspects of the relocation and the physical move. The building occupies 2300 square metres of office accommodation over three levels and was completed on time in November 2003. Staff of SafeFood NSW and the NSW Health Food Branch relocated to the building on 3 November 2003, prior to official commencement of the NSW Food Authority on 5 April 2004.

Our Achievements for 2003/04

Aim - Safe food to plate

How to achieve it	How to measure success	How to achieve it in 2003/04	Measures of success in 2003/04
Implement food safety programs	Food safety system (to plate) across all sectors No system failures leading to foodborne illness	Implement food safety programs in staged process according to risk Assess lower-risk industries for appropriate food safety management systems	Implemented food safety programs for oyster farmers, oyster processors, commercial fishers and goat milk industries Conducted food safety program implementation workshops for oyster processors and commercial fishers Issued Codes of Practice for transport of primary product and seafood, seafood handling premises, commercial fishers, oyster depuration, goat milk production, goat milk manufacture and bottling of unpasteurised goat milk Developed generic food safety programs for commercial fisher cooperatives, fishers, oyster processors and goat milk producers Issued 11,421 licenses in 2003/04 (See Table 1 on p20)
Ensure effectiveness of food safety programs		Determine compliance through audit and inspection process Conduct targeted investigations of regulated sectors Conduct ongoing unscheduled inspections of food businesses	Conducted 5,913 audits, 23 unscheduled audits, 4,574 scheduled inspections and 1,301 unscheduled inspections in 2003/04 (See Table 2 on p20 and Graphs 1–3 on p21) Investigated compliance with Food Standards Code of labelling imported prawns at retail level. Investigation of 295 food businesses found that of the 221 businesses selling imported prawns, 55% complied on first inspection and 100% complied on reinspection Investigated fish substitution in wholesale and import sectors. Investigation of 75 seafood importers and wholesalers found only two mislabelling incidents
Ensure continued product safety in higher risk industries		Introduce regulation requiring licensing of goat and sheep dairy products for human consumption Introduce Authority surveillance program and industry minimum level verification and report program for high risk ready to eat foods Conduct survey and risk assessment on mercury levels in fish Participate in national surveys Conduct baseline studies in high risk plant products, seafood processors, seafood stores, importers, transporters and aquaculture	All known goat milk producers are licensed and have implemented food safety programs Microbiological verification program recorded 24 failed samples of 700 samples taken in 2003/04 Notified of 13 pathogen detections and investigated all; products recalled and destroyed where required Research contributed to new national dietary guidelines for fish consumption Participated in 6 national surveys including Australian Milk Residue Analysis and 22nd Australian Total Diet Survey Increased understanding of food safety management in plant products industry Completed baseline studies for plant products, aquaculture and seafood stores and processors
Ensure continued safety in notifiable food businesses		Increase food business coverage and maintain currency of existing information in notification database Transfer data from Notification and Food Safety Information System (NAFSIS)	Achieved 75% coverage of likely food businesses through direct mail, reminder notices and targeted industry visits Consulted with industry associations, peak bodies and other government agencies to identify food businesses

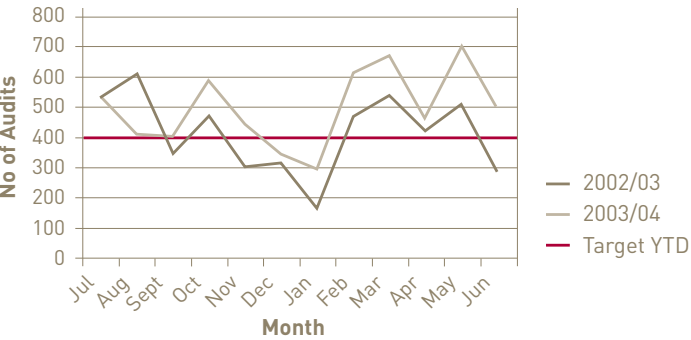
Table 1: Licences issued for July 2003 – June 2004

Activity	Number
Dairy Farms	1155
Milk Factories	95
Milk and Dairy Produce Stores	345
Milk Collectors (from farms)	15
Milk Vendors	825
Meat Abattoirs	94
Animal Food Processing Plants	97
Game Meat Processing Plants	141
Meat Processing Plants	472
Knackeries	6
Rendering Plants	8
Meat Retail Premises	1868
Saleyards	0
Animal Food Vans	69
Game Meat Vans	1388
Meat Vans	3357
Oyster Farms	355
Seafood Businesses	1131
Total of Licences issued	11421

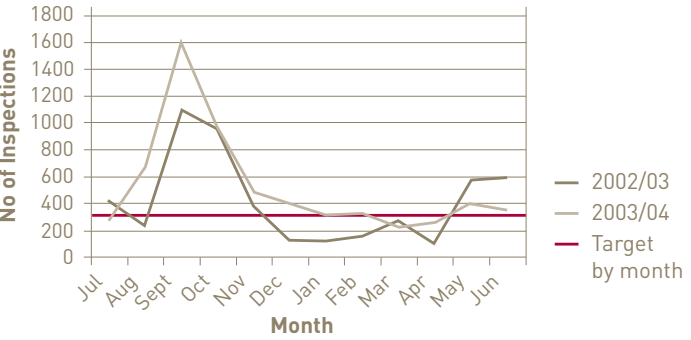
Table 2: Compliance with and enforcement of food safety schemes and plans for July 2003 – June 2004

Activity	Number
Audits	5913
Failed audits	545
Unscheduled audits	23
Scheduled inspections	4574
Failed inspections	86
Unscheduled inspections	1301
Investigations of unlicensed businesses	215
Investigations of other breaches of Act or Schemes	125
Investigations of food borne disease incidents (single)	171
Investigations of food borne disease outbreaks (involving 2 or more people)	76
Direction & improvement notices	875
Prohibition orders	9
Product seizures	56
Show cause	72
Warning	41
Licence cancellations	11
Convictions	11
Mandatory recalls	0
Voluntary recalls	6
Trade retrievals	33
Shellfish harvest area openings	501
Shellfish harvest area closures	457
Microbiological samples taken	700
Failed samples	24

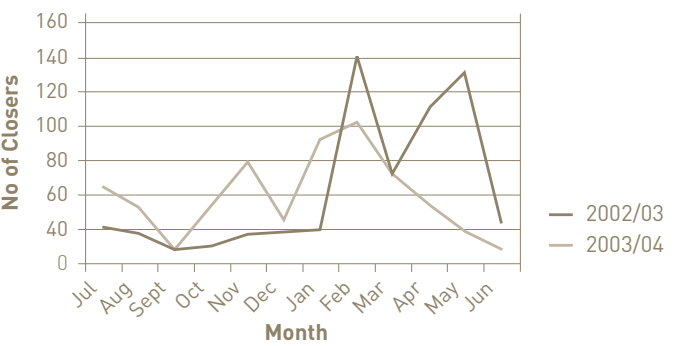
Graph 1: Audits July 2003 to June 2004



Graph 2: Inspections July 2003 to June 2004



Graph 3: Harvest Area Closures July 2003 to June 2004



NOTE: The lower number of estuary closures in the period March to June is attributed to the dry weather.



Aim - Lead NSW Food Authority

How to achieve it	How to measure success	How to achieve it in 2003/04	Measures of success in 2003/04
Establish legislative framework for NSW Food Authority	S73 decision that SafeFood becomes the “relevant authority” under the NSW Food Act Responsible for all parts of Food Standards Code	Amend existing legislation to establish NSW Food Authority	Food Legislation Amendment Act commenced 5 April 2004, repealing the <i>Food Production (Safety) Act 1998</i> which established SafeFood NSW, amended the <i>Food Act 2003</i> to create the NSW Food Authority and transferred relevant provisions, including SafeFood’s Food Safety Scheme regulations, to the <i>Food Act 2003</i> Amended <i>Food Act 2003</i> provides the NSW Food Authority with regulatory coverage of the entire food supply chain
Manage transition to launch of NSW Food Authority		Complete transitional projects to address structure, operation and funding of NSW Food Authority	Developed interim organisation structure for the Authority Established interim foodborne illness response protocol with NSW Health Transferred recurrent annual funding of \$3.75 million from NSW Health and secured \$1.23 million for laboratory services Transferred staff from NSW Health and SafeFood NSW by Ministerial Order with union and staff agreement
Create NSW Food Authority head office		Establish dedicated headquarters to house Australia’s first through-chain State food regulatory agency	Completed construction and fit out of NSW Food Authority head office on time and within budget in October 2003. Most staff relocated in November 2003, with the final stage of food inspectors relocated into the building on 23 April 2004

Aim - Risk analysis implemented in all schemes

How to achieve it	How to measure success	How to achieve it in 2003/04	Measures of success in 2003/04
Assess risk of industries not currently regulated	Risk analysis completed for all high risk sectors Resource allocation aligned to risks Emerging risks monitored – “no surprises”	Identify other priority sectors and products for risk analysis Where risk warrants, introduce food safety schemes in prioritised industries not currently regulated	Developed and presented draft versions of a plant products regulation and manual to industry prior to undergoing statutory public consultation Commenced risk profile for egg industry Completed submission for expert assessment of food safety risks associated with cooking crustacea and use of estuary water for cooling Profiled catering industry prior to initiating formal consultation Completed baseline studies for plant products, aquaculture and seafood stores and processors Reviewed food hygiene practices at random sample of hospitals and aged care facilities throughout NSW
Update risk assessment of regulated industries		Update dairy, meat and seafood risk assessments	Updated risk assessment of dairy, meat and seafood products underway to support development of a consolidated food safety scheme regulation
Monitor emerging risks		Conduct survey of honey samples for presence of nitrofurans Contribute to national survey on <i>Mycobacterium paratuberculosis</i> in the dairy industry Conduct risk analysis for porcine myocarditis syndrome Conduct microbiological sampling of water used in rinsing oysters during shucking	Conducted survey which showed presence of nitrofurans in some samples, Food Standards Code subsequently amended to prohibit presence of nitrofurans in honey Participated in national steering committee surveys and monitoring Completed risk analysis for potential public health significance in collaboration with Department of Primary Industries, NSW Health, industry experts and Commonwealth Distributed general circular to change methods used in businesses opening oysters

Aim - Community confidence and recognition

How to achieve it	How to measure success	How to achieve it in 2003/04	Measures of success in 2003/04
Build the NSW Food Authority brand	Branding of all licensed premises and vehicles	Define the NSW Food Authority corporate identity and apply to relevant community presence	Re-branded stationery, licences, Internet site, communications materials and brochures, newsletters, car signage and building signage by 30 June 2004
Provide a single point of contact for consumers and industry	Surveys demonstrate increased recognition Customer service unit established	Establish a consumer and industry contact centre	Established the Consumer and Industry Contact Centre in April 2004 with 1300 number, e-mail, fax or letter contact points for ease of access (See Figures 5–7 below)

Figure 5: Contact Centre closure rate
(% of calls completed at first contact)

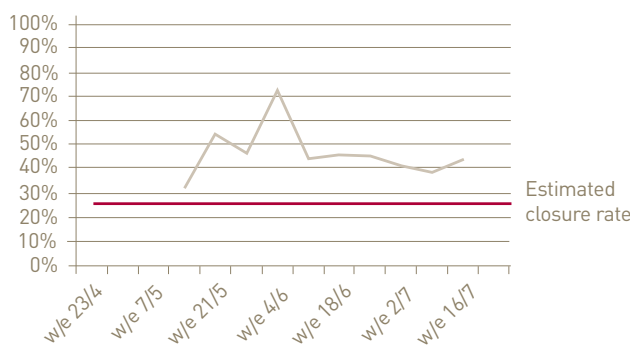


Figure 6: Contact Centre weekly issues logged by issue “type”

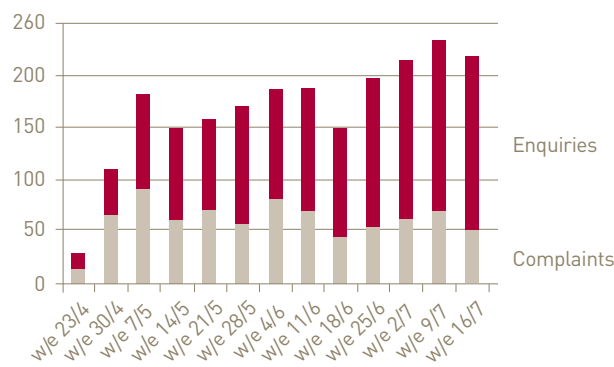
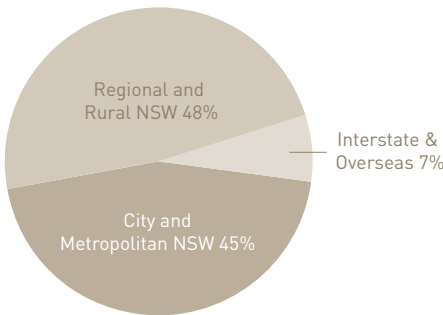


Figure 7: Contact Centre calls by geographic type



Aim - Uniform approach to all industries

How to achieve it	How to measure success	How to achieve it in 2003/04	Measures of success in 2003/04
Standardise legislation regulating food businesses in NSW	Uniform operational processes implemented Uniform cost recovery regime introduced Consistency of processes confirmed by reviews	Merge regulatory provisions of <i>Food Act 2003</i> and <i>Food Production (Safety) Act 1998</i> into single Food Act covering all businesses in the food supply chain Develop consolidated food safety scheme regulation and generic food safety program	Amended <i>Food Act 2003</i> provides the NSW Food Authority with regulatory coverage of the entire food supply chain Changed regulations to standardise licence, audit and travel fees across all regulated industries
Establish a standardised means of recording interaction with industry		Establish a single IT-based Customer Management System Appropriately support food industry notification requirements through the Notification and Food Safety Information System (NAFSIS)	Established a standardised IT operating environment and centralised Customer Management System, which incorporates the Consumer and Industry Contact Centre operations and the Notification and Food Safety Information System (NAFSIS) The Australian Bureau of Statistics has estimated there are 50,000 food-related businesses in NSW and the Food Authority holds details of 40,000 individual notifications

Aim - Functionally aligned structure

How to achieve it	How to measure success	How to achieve it in 2003/04	Measures of success in 2003/04
Design a functionally aligned structure for the NSW Food Authority	New structure in place Robust program-based accounting system All operational staff multi-skilled	Review Branch processes to determine activities, structure and resources Design a functionally aligned structure for the NSW Food Authority	Completed Branch Reviews in February 2004 and submitted for staff consultation Developed interim NSW Food Authority structure based on SafeFood NSW structure endorsed by CCQG in 2003 and introduced on 5 April 2004 Commenced mentoring program Initiated training programs in legislation, foodborne illness investigation, auditing and policies and procedures Reviewed operational polices and procedures documentation

Figure 8: NSW Food Authority regional offices



Case Study:
Karen Krist, Senior Policy
and Science Officer
Local Government
Partnership Project



The Section 73 Review recommended that the NSW Government explore with local government a mandated and resourced role for local government working in partnership with the Authority to regulate food in NSW.

In mid-2003, a Food Regulation Partnership was established, with representation by the Authority, Department of Local Government, NSW Health, the Local Government Association of NSW, the Shires Association of NSW, the Local Government Managers Association, the Australian Institute of Environmental Health and the Development and Environmental Professionals Association.

The Partnership published a paper in November 2003, *Toward A Strong Food Regulation Partnership* which addressed the issues of defining roles, recovering costs, providing support and assistance and coordinating frameworks across State and local governments involved in food regulation in NSW.

An options paper will be available in October 2004 and metropolitan and regional workshops will be conducted during November. A draft report proposing the way forward will be prepared in early 2005.



Aim - Cooperative working relationships

How to achieve it	How to measure success	How to achieve it in 2003/04	Measures of success in 2003/04
Establish consultative arrangements for staff and unions	Memoranda of Understanding (MoU) in place with key agencies Stakeholder relationships demonstrated as “good” Critical service level agreements met	Support operation of the Joint Consultative Committee	Transition of staff from SafeFood NSW and NSW Health was facilitated by a transition Joint Consultative Committee involving both the Public Service Association and Health Services Union. Staff transfer progressed amicably indicating a successful 12 month consultation process NSW Food Authority Joint Consultative Committee operational and assisting in the restructure process
Establish consultative arrangements for industry		Establish and maintain industry consultation mechanisms	Established NSW Seafood Industry Conference Established NSW Meat Industry Consultative Council Established Peak Oyster Advisory Group Established Egg Industry Technical Working Group Maintained NSW Dairy Industry Conference
Establish formal and informal consultation arrangements with other NSW agencies		Establish Memoranda of Understanding with NSW Health and the NSW Department of Primary Industries Continue partnership with other food regulators through TAG, FSANZ, PISC and ISC Develop collaborative model with local government Participate in whole-of-government initiatives Determine opportunity to share corporate services with other agencies	Submitted draft Memoranda of Understanding to NSW Health and the NSW Department of Primary Industries Developed Memorandum of Understanding with NSW Police Rural Crime Unit and conducted joint investigations Published directions paper in collaboration with local government under project to determine mandated role for local government in food regulation Assisted in developing a draft Food Industry Emergency Sub-plan under the State Disaster Plan and hosting a workshop to coordinate response to food emergencies Established regional offices in Lismore, Newcastle, Coffs Harbour, Bathurst, Wollongong, Dubbo, Albury and Taree (see Figure 8 on p24)
Contribute to national food regulation processes		Participate actively in national food regulatory forums and processes Lead process to develop national protocol for interstate complaints referral Share material to contribute to development of national standards	NSW Food Authority and Minister maintained NSW representation at Food Regulation Ministerial Council and Standing Committee, Implementation Sub-Committee and Technical Advisory Group. Officers participate in approximately 40 national working groups and committees associated with the national food regulatory system Completed protocol which has been implemented on a trial basis Contributed NSW Food Authority material developed through NSW Seafood Safety Scheme to assist in developing national seafood standard

Aim - Sustainable, knowledgeable and effective people resource

How to achieve it	How to measure success	How to achieve it in 2003/04	Measures of success in 2003/04
Enact succession planning	Staff profile enables succession Competency measures across all roles met Program plans on target	Establish succession planning scheme	Recruited three new graduates to undergo two-year training program
Enact sound human resource management		Implement strategic human resource plan	Implemented flexible working hours agreement Trained staff in management, dealing with potentially violent people, investigation and intelligence gathering techniques, customer service and performance management Updated human resource infrastructure to incorporate and support NSW Health staff Operated occupational health and safety subcommittee of the Joint Consultative Committee to address initiatives including safety equipment for field staff and conflict management training

Our Other Activities for 2003/04

Research and Development

The NSW Food Authority undertook the following research and development projects in 2003/04:

- A review of oyster processing food safety program
- A review of NSW poultry processing standards
- A review of the NSW Shellfish Program
- A study of the hygiene of oyster shucking
- A microbiological verification (general food) survey
- A survey of mercury in fish
- A risk assessment of mercury in fish
- A shellfish meat and estuary water sample survey
- A goat milk microbiological survey
- A food safety baseline survey of NSW hospitals and aged care businesses
- Control of foodborne listeriosis in health care institutions
- A national fish substitution survey
- A survey of *Listeria monocytogenes* in cooked prawns
- A microbiological survey of Peking duck
- A survey on the use of health claims

Human Resources

The NSW Food Authority recorded the following details on our people:

Table 3: Staff numbers by category in 2003/04

Category	2003/04	2002/03	2001/02	2000/01
Administration	37	25	28*	28
Technical/food safety officers	68	42	41	42
Total non-SES	105	67	69	71
Senior Executive Service	3	3	5	4

* Includes six administration staff of the National Livestock Reporting Service (NLRS), five of whom received severance packages on 30 June 2002 as a result of that service transferring to Meat and Livestock Australia. NLRS also employed 14 market reporters who were contractors and not included in overall staff numbers.

Exceptional movements in wages, salaries or allowances in 2003/04

Effective from the first pay period after 1 July 2003, all Authority staff covered by the Crown Employees (Public Sector – Salaries January, 2002) Award received a salary increase of five per cent (5%). This was the final increase outlined in the Memorandum of Understanding entered into on 2 March 2000 between the Government and the Public Service Association and other public sector unions. The 2002 Award and the Memorandum of Understanding expired on 30 June 2004.

Personnel policies and practices in 2003/04

New provisions for temporary employment under the *Public Sector Employment and Management Act 2002* came into effect on 15 December 2003 and new provisions commenced on 12 April 2004 for casual employment.

The Authority continued its service level agreement for the provision of payroll and leave administration services, together with parts of the recruitment process, with the Central Corporate Services Unit of the Department of Commerce during the year.

A new flexible working hours agreement was introduced on 23 February 2004 to provide greater flexibility in working hours, a fair recognition of the time worked and a balance between work and family life. Separate Agreements for Food Safety Officers and Administrative and Clerical staff were introduced. The parties to the Agreements are the Premier’s Department, the former SafeFood and the Public Service Association of NSW.

The Authority has an Employee Assistance Program in place, which provides free professional counselling to employees and their families.

Industrial relations policies and practices in 2003/04

On 23 April 2004, 25 Food Inspectors employed by Population Health/Public Health Units of Area Health Services in NSW Health and 9 staff members from the Food Branch of NSW Department of Health were transferred to the NSW Food Authority by Ministerial Order with the concurrence of the Minister for Health pursuant to the *Food Act 2003*. A Memorandum of Understanding concerning the industrial relations aspects of the formation of the Authority was concluded. The parties

to the Memorandum were SafeFood, the NSW Department of Health, the Public Employment Office of NSW, Premier’s Department, the Public Service Association of NSW and the Health Services Union.

The NSW Food Authority has continued the operation of its Departmental Joint Consultative Committee (JCC), which will particularly be concerned with the organisational restructure to commence in August 2004. The JCC contains management and staff representatives from a wide cross-section of the organisation and regularly meets to discuss issues of mutual concern.

Consultants

The NSW Food Authority employed the following consultancies in 2003/04:

Table 4: Consultancies in 2003/04

Name	Nature	Purpose	Cost
BioDevelopment Consulting	Policy and Science	Risk assessment of smoked fish	\$12,510
Blackwall Seafoods	Operations	Compile Code of Practice for Seafood Handling	\$2,342
Blackwall Seafoods	Operations	Train Field Staff in Commercial Fishing Practices	\$5,500
FoodLink	Policy and Science	Facilitation of Plant Products Sector working group	\$36,000
Hawkless Consulting	Policy and Science	Prepare cost-benefit analysis for plant products regulatory impact statement	\$19,600
Johnston Graphic Design	Business Services	New corporate identity	\$24,000
Master Fish Merchants Association	Operations	Baseline study – Seafood (retail, processors, stores). Provide industry advice to the Authority and identify sectors to inspect	\$600
Mercer Cullen Egan & Dell	Business Services	Cost study of food inspector health awards and current SafeFood awards	\$15,000
Milliways Consultants	Operations	Customer Management Systems – Operations Review	\$6,875
Operational Concepts	Policy and Science	Development of Complaint and Enquiry Management System	\$22,000
Siller Systems	Business Services	Records management strategy, disposal schedule and thesaurus/classification scheme	\$11,550
Waterfield Consulting	Policy and Science	Strategic Planning Process	\$10,000



EEO

SafeFood and the NSW Food Authority continued to maintain support for the principles of Equal Employment Opportunity and applied them in the people development and succession component of its 2001-2004 Strategic Plan. Two key strategies were the opportunities for development and training across all classifications of the organisation and recruitment processes which saw that of 45 new recruits during the year, 17 were females. This was notable particularly in the Food Safety Officer classification, which in the past has had difficulty in attracting candidates.

Promotion

- Following are presentations and publications of the NSW Food Authority for 2003/04:
- Publications**
- *Executive Outcomes* (electronic newsletter) July 2003 to June 2004
 - *Food S@fety Bytes* (electronic newsletter) July 2003 to June 2004
 - *Transition Times* (electronic newsletter) July 2003 to October 2003
 - *Shellfish News* in July and October 2003
 - *Listeria Monocytogenes fact sheet* on 10 December 2003
 - *Pathogenic Escherichia Coli fact sheet* on 16 January 2004
 - *Salmonella fact sheet* on 5 February 2004
 - *A profile of the NSW Food Authority* in March 2004

Table 5: Staff by Equal Employment Opportunity groups 2003/04

EEO groups in 2003/04	Number
Total staff (non-SES)	105
Male	67
Female	38
Staff who are Aboriginal and Torres Strait Islanders	1
Staff who have a disability	4
Staff of racial, ethnic and ethno-religious minority groups (REM)	2

Table 6: EEO staff groups by level (\$ earnings in 2003/04)

Level	Total staff (non-SES)	Female staff	ATSI staff	Staff with a disability	REM staff
< \$30,146	0	0	0	0	0
\$30,146 – \$39,593	4	1	0	0	0
\$39,594 – \$44,264	10	6	0	1	0
\$44,265 – \$56,012	6	5	1	0	0
\$56,013 – \$72,434	59	18	0	2	2
\$72,435 – \$90,543	24	8	0	1	0
> \$90,543 (non-SES)	2	0	0	0	0
Total	105	38	1	4	2

Table 7: EEO staff groups by employment basis in 2003/04

Employment basis	Total staff (non-SES)	Female staff	ATSI staff	Staff with a disability	REM staff
Full-time	96	33	1	4	2
Part-time	6	5	0	0	0
Casual	3	0	0	0	0
Total	105	38	1	4	2

- *Safe food for vulnerable groups fact sheet* on 18 March 2004
 - *Safe food handling fact sheet* on 18 March 2004
 - *Safe food storage and transport fact sheet* on 18 March 2004
 - *Campylobacter fact sheet* on 25 March 2004
 - *Preventing common foodborne illnesses fact sheet* on 25 March 2004
 - *Fish substitution fact sheet* on 22 April 2004
 - *Food safety risks of doggy bags fact sheet* on 28 April 2004
 - *Nitrofurans in honey fact sheet* on 5 May 2004
 - *Imported seafood labelling fact sheet* on 12 May 2004
 - *Food business notification fact sheet* on 13 May 2004
 - *Dioxins in food fact sheet* on 31 May 2004
 - *NSW Food Authority Internet site www.foodauthority.nsw.gov.au* in June 2004
 - *Recreational shellfish harvest fact sheet* on 3 June 2004
 - *Safe lunches for kids fact sheet* on 4 June 2004
 - *NSW Food Authority status report* on 29 June 2004
 - *SafeFood NSW Annual Report 2002/03* on 31 October 2003 (the Annual Report represents the Statement of Affairs of SafeFood NSW)
 - *Toward a strong food regulation partnership: a directions paper for State and Local Government* in November 2003
- Presentations**
- *Implementation of the Seafood Safety Scheme* by M. Guadagnin and E. Jansson at NSW Seafood Industry Council, Sydney on 11 July 2003
 - *Section 73 Review of SafeFood NSW and adopting of Food Standards Code 3.2.1 in NSW* by E. Mulhearn at the Australian HACCP Conference, Brisbane on 25 July 2003
 - *Food safety proposals affecting farm operations in NSW* by G. Davey at NSW

- Farmers’ Association Annual Conference, Sydney on 22 July 2003
- *Development of food safety standards* by B. Porter and M. Tegel at CWA Convention, Potts Point on 30 July 2003
 - *Implementation strategies for wild shellfish food safety programs* by E. Jansson at Seafood Leadership Development Program, Canberra in August 2003
 - *Establishing the NSW food agency* by R. Smith at Restaurant and Catering NSW, Sydney on 14 August 2003
 - *Development of an egg safety scheme* by C. Chan at consultation meeting with egg industry on 4 August 2003
 - *The role of the International Dairy Federation (IDF) in issues and crisis management* by G. Davey at the IDF World Dairy Summit and Centenary, Brugge, 8 September 2003
 - *SafeFood – Past, Present, Future* by C. Chan at District Veterinarian Conference, Newcastle on 17 September 2003
 - *Milk and Crohn’s Disease – “the missing link?”* by C. Chan at District Veterinarian Conference, Newcastle on 17 September 2003
 - *Development of an egg safety scheme* by C.Chan at Egg Reference Group meeting, Newington, Sydney on 14 October 2003
 - *Food safety – paddock to plate* by G. Davey at Egg Industry Reference Group meeting, Newington, Sydney on 14 October 2003
 - *Issues and Emergency Management in Australia – a coordinated approach* by C. Chan at DIAA NSW Branch Annual Conference, Sydney on 23 October 2003
 - *Food labelling seminar* by B. Porter at Australian Industry Group, Rosehill on 30 October 2003
 - *Trends in Food Safety* by G. Davey at AAB Holdings (Gazelle Foods) workshop at Homebush, Sydney on 27 November 2003
 - *The formation of the NSW Food Authority, mandatory food safety programs and the trial audit program*

- in hospitals and aged care* by C. Bass, published in *Australian Nursing Homes & Extended Care Association (NSW) Newsletter Chronicle* in December 2003
- *SafeFood seafood food safety programs* by N. Stuckey at Industry Development Centre, Newcastle University, Newcastle on 28 January 2004
 - *The NSW Food Authority* by G. Davey to Hospital & Aged Care Reference Group at Newington, Sydney on 8 December 2003
 - *Implementation of the Seafood Safety Scheme* by M. Guadagnin and E. Jansson at NSW Seafood Industry Council, Sydney on 27 January 2004
 - *The new food safety agency* by P. Day at Australian Meat Standards Committee, Sydney on 3 February 2004
 - *The NSW Food Authority and Consumer Attitudes to Food Safety* by P. Sutherland at Pasture Agronomy Conference, Richmond on 23 February 2004
 - *Public health perspective of validation – are we making things better for the public’s health* by S. Fabiansson at International workshop – the brave new world of validation, Meat and Livestock Australia, North Sydney on 22 and 23 February 2004
 - *The NSW Food Authority* by P. Sutherland at the Royal Easter Show, Homebush, NSW on 5 April 2004
 - *Through-chain validation and verification of HACCP plans for dairy processing plants* by P. Sutherland at IDF International Symposium on Dairy Hygiene and Safety, Capetown, South Africa on 1-7 March 2004
 - *NSW Food Authority and management of food emergencies* by C. Chan at State Emergency Management Committee (SEMC), Sydney on 4 March 2004
 - *Food safety programs in hospitals and aged care* by C. Bass at Institute of Hospitality and Health Care, Ballina on 18 March 2004
 - *Implementation of the new Food Act* by B. Porter at OTEN training seminar, Strathfield on 23 March 2004

Case Study:

Brian Biffin,
Regional Manager
Imported Prawn Labelling



The Australia and New Zealand Food Standards Code, which the NSW Food Authority enforces, requires businesses which display seafood for retail sale to also display either the country of origin or the description “imported” at point of sale. From 7 to 20 May 2004, NSW Food Authority officers inspected 295 premises in the North Coast, Hunter, Sydney, Illawarra, South Coast, Mid West, Far/South West and New England regions to determine if they were complying with Code requirements. Officers found 221 of the 295 businesses sold imported prawns, and only 37 (17%) of these, located in the North Coast, Mid West, Far/South West and New England, were labelling prawns correctly. A total of 100 (45%) businesses in Sydney, Hunter, Illawarra and South Coast regions were found to be non-compliant and were given seven days to comply or face legal action under the *NSW Food Act 2003* and possible penalties of up to \$55,000 for individuals and \$275,000 for companies. On reinspection, all 100 (100%) businesses were found to be compliant, a major improvement in ensuring consumers have adequate information to make informed choices when purchasing food.



- *Examples of quantitative risk assessment methodology* by S. Fabiansson at risk assessment workshop, Food Standards Australia New Zealand, Canberra on 29 and 30 April 2004
- *A brief introduction to NSW Food Authority and enforcing food labelling* by M. Apollonov at Nestle, Rhodes on 5 May 2004
- *The NSW Food Authority and Local Government Partnership* by T. Outtrim, P. Sutherland and K. Krist at EDAP Western Group Annual Conference, Dubbo on 7 May 2004
- *Forensic food inspection* by B. Porter at University of NSW, Kensington on 19 May 2004
- *Food inspection in NSW – a brief history* (publication) by B. Porter in Food Australia in June 2004
- *Managing food safety for the Olympics* by C. Chan at meeting with Quindao Olympic delegation, Sydney on 1 June 2004
- *New Food Act workshops for local government* by B. Porter and D. Hook at AIEH, Randwick on 30 June 2004

Officers of the NSW Food Authority made overseas visits for the following purposes in 2003/04:

- G. Davey attended the IDF World Dairy Summit & Centenary in Brugges, Belgium from 8 to 12 September 2003*
 - G. Davey attended the ANZFR Ministerial Council meeting in Auckland, New Zealand on 12 December 2003
 - G. Davey attended the IDF Programme Coordination Committee meeting in Brussels on 7 and 8 January 2004*
 - G. Davey attended the International Milk Promotion (IMP) mid year meeting in Amsterdam on 27 and 28 April 2004 and the IDF Standing Committee on Marketing meeting in Amsterdam on 29 April 2004*
- *Expenses to attend the meetings were met by Milk Marketing (NSW) Pty Limited, Dairy Australia and the organising committees.
- P. Day, G. Moran and A. Zammit attended the New Zealand Shellfish

Conference and the New Zealand Food Safety Authority in New Zealand from 27 March to 4 April 2004

- B. Nelan attended an International Conference on Molluscan Shellfish in Ireland from 10 to 27 June 2004
- P. Sutherland attended the World Health Organisation/OIE/IDF Ubisi 2004 Conference and IDF Standing Committee on Microbiological Hygiene at Capetown, South Africa from 29 February to 7 March 2004

Consumer response

The NSW Food Authority welcomes suggestions, comments and complaints from members of the public. The Authority strives to deal quickly, constructively and confidentially with feedback, particularly complaints. It uses the outcomes of internal reviews arising from complaints to actively inform its service and system improvement processes. All consumer complaints are received initially by the

Figure 9:
Complaints by type (May)

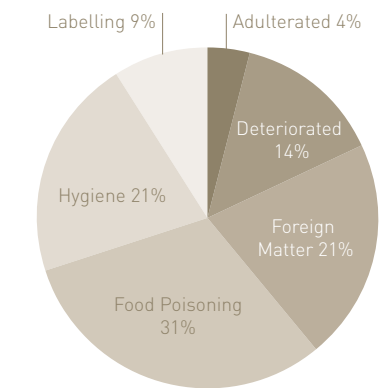
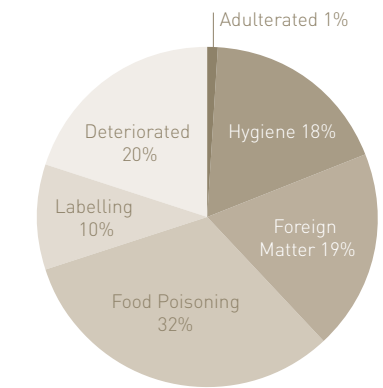


Figure 10:
Complaints by type (June)



Consumer and Industry Contact Centre and logged in the Customer Management System. The Centre resolves queries where possible and averages a closure rate of around 40% at first point of call. Contact requiring specialist food safety knowledge is directed to an appropriate Authority officer for response and further action where required. All details are logged in the Customer Management System.

From 23 April to 30 June 2004, the Centre has received 574 food related complaints, representing around one-third of all calls received. These complaints relate to allegations of food poisoning, hygiene breaches, foreign matter in food, deterioration of food, labelling breaches and adulterated food.

Guarantee of service

The NSW Food Authority has established internal control processes designed to provide reasonable assurance regarding the achievement of its objectives. The internal audit function conducts a program of review to assess these controls. The Authority is committed to delivering appropriate, effective and quality services to its stakeholders.

Risk management and insurance activities

The NSW Food Authority is a member of the NSW Treasury Managed Fund which is a self-insurance arrangement for NSW Government agencies. As such, the Authority is fully covered under NSW legislation and is committed to using risk management principles to minimise risk exposure and premium costs. The management of risk has been a key consideration in the development of the Authority's strategic plan and issue management is carried out as part of its routine operation. The Authority has a tape backup scheduled for IT servers in place. Tapes are stored offsite at the Government Records Repository to

enable restoration of lost data from backup. A disaster recovery build is in place for all servers.

Disclosure of controlled entities

The NSW Food Authority's interest in Pacific Industry Services Corporation (PISC) Pty Limited, a subsidiary company of the former SafeFood NSW which undertook laboratory analyses, was sold in 2001/02 to Silliker-Biomerioux Corp (USA). PISC will wind up during 2004/05.

Milk Marketing (NSW) Pty Limited has continued to function in a limited framework of assistance to the dairy industry. At meetings during 2003/04, it further developed its policies aimed at promoting the quality of NSW milk and promoting the quality and safety of milk and dairy foods.

Through its liaison with the International Dairy Federation and other international contacts, it is now part of an international network for the exchange of confidential information regarding issues which might impact on the image and sales of milk and dairy products.

The company receives regular reports on emerging issues which may have an effect on the NSW dairy industry. It also develops strategies for the management of issues and crises such as the experiences in the UK with Bovine Spongiform Encephalopathy, foot and mouth disease, *Mycobacterium Paratuberculosis* as well as issues such as A2 milk, obesity and animal welfare.

In keeping with its objective, the company has developed systems for disseminating information on emerging issues to stakeholders and opinion leaders. The board of the company, appointed by the Minister, comprises George Davey, Director-General of the NSW Food Authority (Chair) and Robert Grey, representing the dairy industry.

Ethnic affairs priorities statement

This statement confirms the NSW Food Authority's commitment to the NSW Charter of Principles for a Culturally Diverse Society and reflects how services and facilities are accessible to the NSW community.

The Authority works to ensure that food in NSW is safe and correctly labelled and that consumers are able to make informed choices about the food they eat. The Authority's programs will be developed to incorporate the ethnic diversity of the NSW food industry and NSW consumers and service those from culturally and linguistically diverse backgrounds.

This assists the industry in two ways: firstly by ensuring access to the Authority's consultation, regulatory programs and advisory services to all food industry participants, and secondly, by taking ethnic methods of food preparation into account when designing regulatory programs. Training of staff engaged in developing such programs involves fostering recognition of different food handling techniques. It also requires an outcomes approach to regulation, providing more flexibility in achieving regulatory outcomes.

With regard to consumers, access will be ensured through interpretation services contracted by the Contact Centre. Public media statements will be made available to the ethnic media. In the longer term, Consumer Information and Education programs will be developed which take the needs of all NSW community members into account. Training of communications staff on reaching ethnic media and communities has been an important part of developing the communications strategy.

All residents of NSW have access to the NSW Food Authority's services. The needs of the community and industry will be met professionally, equitably and appropriately.

Ethnic affairs action plan

To implement the Ethnic Affairs Priority Statement the Authority will:

Identify ethnic groups within each industry going through a food safety scheme development process and determine the best way of involving those groups though the consultation process

Take ethnic/traditional methods of food preparation into account when considering risk management options for particular food products

Translate key fact sheets of relevance to particular communities

Provide access to a translation service for the Consumer and Industry Contact Centre

Target ethnic media with relevant press releases through the Community Relations Commission ethnic media contacts

Take the needs of people from culturally and linguistically diverse backgrounds into account when developing Consumer Information and Education program proposals.

NSW Government action plan for women

Although the Government's formal Action Plan for Women came to a conclusion in 1999, the Authority continues to encourage the career development of women in the agency, particularly in the food safety officer positions where they are traditionally under represented.

Occupational health and safety

The Authority is committed to ensuring the health, safety and welfare at work of all its employees and operates a dedicated occupational health and safety committee.



The Authority engaged a consultant to review its occupational health and safety policies and practices in June 2004. The consultant will also undertake an assessment of hazards and risks across the organisation having regard to its new through-chain operations. Part of this process will include consultation with representative focus groups across the organisation.

Training for all field and front-line staff in dealing with aggressive and potentially violent behaviour was undertaken during the year.

Waste reduction

The Authority operates in accordance with the NSW Government Waste Reduction and Purchasing Policy (WRAPP). Details of this are reported on to the Department of Environment and Conservation on a bi-annual basis.

Authority policy is to become a model waste manager through reducing waste, increasing recycling and purchasing recycled content products where possible. Initiatives for waste reduction include the increased use of electronic documents in place of paper copies, including email, e-newsletters and electronic record keeping. Double-sided printing and copying are also used where appropriate.

Recycling bins are distributed throughout Authority offices, including specialised bins for secure documents, which are then shredded prior to recycling. Used toner cartridges are also recycled where possible. All copy paper purchased has a minimum 50 per cent recycled content and remanufactured laser printer and fax toner cartridges are also purchased when available.

Additional matters

Code of conduct

The Authority is committed to meeting the expectations of the community to conduct its work with efficiency, economy, fairness, impartiality and integrity. These principles are inherent in the SafeFood Code of Conduct which was adopted unchanged by the Authority.

Annual report production

The NSW Food Authority Annual Report 2003/04 cost \$17,000 to produce 1500 printed copies.

The NSW Food Authority Annual Report 2003/04 is available for free download on the Authority Internet site at www.foodauthority.nsw.gov.au.

Performance and numbers of executive officers

The NSW Food Authority recorded the following details on performance and numbers of senior managers for 2003/04:

Table 8: NSW Food Authority Senior Management for 2003/04

	2003/04	2002/03
Total SES positions	3	3
CEO Level 6	1	1
SES Level 3	2	2
Female SES	0	0

Mr George Davey
B Sc (Honours), M Sc (Food Technology)
Director-General, SES Level 6
Remuneration package \$235,817 per annum (includes employment benefits of \$17,033)

Mr Davey has been Director-General of the NSW Food Authority since establishment in April 2004, and was Chief Executive Officer of the former SafeFood Production NSW since establishment in 1999. Mr Davey has a performance agreement with the NSW Minister for Primary Industries which is reviewed twice a year. For the 2003/04 reporting period the Minister

indicated that he was satisfied that all performance criteria had been met. Under Mr Davey’s leadership, the Authority has achieved substantial progress in many initiatives. These include establishment of Australia’s first through-chain State food regulation agency, successful integration of staff of predecessor organisations into the Authority, enactment of the *NSW Food Act 2003*, securing funding for the Authority and ensuring the responsible management of the Authority’s finances, preparing the first three year strategic plan for the Authority, and continuing to implement a risk-based consultative approach to regulation of the NSW food industry.

Freedom of Information Act

There was one Freedom of Information application received by the NSW Food Authority during the year 2003/04. A determination was made within the required period of 21 days and an amount of \$15.00 was paid by the applicant. The Freedom of Information application related to documents that were exempt under section 25 (1) of the Act.

Privacy Management Plan

In accordance with its obligations under the Privacy and Personal Information Protection Act and the Authority’s Privacy Management Plan, the NSW Food Authority uses personal information in accordance with the purposes for which it was collected. In the main, this personal information comprises the name, address and telephone number of businesses licensed with the Authority in the dairy, meat and seafood industries and food businesses which notify details through the Notification and Food Safety Information System (NAFSIS). This information is used by the Authority to identify businesses for purposes such as conducting audits and inspections and licensing activities.

The Authority is reviewing its privacy management plan to ensure compliance with the *Health Records and Information Privacy Act 2002*. The Authority has issued a privacy policy relating specifically to the protection and use of information held on the Customer Management System.

Government Energy Management Plan

The NSW Food Authority is committed to achieving savings in energy usage and sustained Energy Management principles. It has two main sites, which are expected to move to the Department of Commerce electricity contract to enable the purchase of 6% of electricity from renewable sources. Accountability and responsibility for energy management has been established by the nomination of an Energy Manager and Energy Coordinator.

Where cost effective, the Authority will endeavour to reduce energy consumption in buildings by 25% of the 1995 level by 2005/06.

Table 9 indicates major energy fuels purchased by the Authority in 2003/04. During 2002/03 and 2003/04, there has been a 181% increase in electricity and 22% increase in unleaded petrol consumption. A large proportion of the

increase in electricity consumption was due to the relocation of the head office to new premises at Newington which required a change from tenant services to combined services, and additional electricity usage for finishing and office fitout work in the new building. The increase in petrol consumption was due to additional vehicles joining from Custom Fleet following the merger with NSW Health in the formation of the Authority. Energy cost increased by 41% during this period.

Table 10 shows the comparative energy performance indicators for the last two years.*

*The performance indicators have deteriorated due to formation of the new expanded Authority and relocation to new larger premises at Newington.

The Authority is in constant consultation with the Department of Commerce to keep abreast of latest innovations in energy management that will allow it to sustain the energy saving targets and deliver a pleasing environmental outcome. It is in the process of progressively replacing older office equipment with more energy efficient models, and is planning on introducing at least one hybrid motor vehicle within the next year.

Table 9: Major energy fuels purchased in 2003/04

Fuel	Total (GJ) energy consumed	% of Total energy	Annual cost (ex gst)	Greenhouse gas emission (CO2) (tonnes)
Electricity	1,618	20.6%	\$48,769	429.7
Unleaded Petrol	6,241	79.4%	\$147,200	411.9
Total	7,859	100.0%	\$195,969	841.6

Table 10: Comparative energy performance indicators for 2003/04

Buildings	MJ/m2/a			MJ/person/a		
	2002/03	2003/04	Change	2002/03	2003/04	Change
Sydney	375	468	24.8%	11,704	14,603	24.8%
Newington	N/A	1,052	N/A	N/A	23,448	N/A
Taree	427	468	9.6%	11,960	13,109	9.6%
Transport	MJ/km			L/100km		
	2002/03	2003/04	Change	2002/03	2003/04	Change
Passenger Vehicles	3.81	3.82	0%	8.97	8.96	0%

Case Study: Michelle Guadagnin, Manager New Industries Scheme Development



The NSW Food Authority is progressively assessing several industries for appropriate methods of food safety management. These industries, “new” to Authority regulation, include plant products, eggs, seafood and aquaculture, goat dairies, hospitals and aged care, childcare and catering businesses. Each industry is being assessed for the food safety risks it faces to determine the best means to manage risks, whether by formal regulation and introduction of food safety programs or other methods such as codes of practice. The goat dairy and seafood industries are implementing food safety programs as part of regulation and the plant products industry is undergoing consultation to introduce regulation. The NSW Government allocated \$2 million over two years in its 2004/05 State Budget to help high risk industries, which include hospitals and aged care, catering and childcare services, to meet national food safety requirements by mid-2007.

Our Future

The NSW Food Authority implemented a new Strategic Plan in July 2004. This plan will guide Authority direction over the next three years.

Figure 11: Strategic Plan 2004 to 2007

By June 2005	2007 KPIs	2007 Outcomes
1. Consolidated Food Safety Scheme in place	<ul style="list-style-type: none">Foodborne illness reduced by effective regulatory systemHigh risk industries coveredIndustry complies with operating risk model	Safe Food to Plate
2. Through-chain risk model operational	<ul style="list-style-type: none">Industry aware of requirementsSurveys on compliance with requirements conducted	Suitable and Correctly Labelled Food
3. Foodborne illness investigation and data management systems integrated	<ul style="list-style-type: none">Surveys on knowledge/attitudes/behaviour conductedLess foodborne illness from domestic handlingConsumer information readily available	Informed and Responsive Consumers
4. Consumer education program proposal completed	<ul style="list-style-type: none">FSPs implemented where requiredCompliance with Food Safety Program and Food Standards Code requirementsEffective operation of industry committeesIndustry engages the Authority for expert advice	Industry Embracing Food Safety
5. Food Safety Scheme communications and training program in place	<ul style="list-style-type: none">Local Government Councils services model agreedModel embraces all Local Government CouncilsFunding arrangements establishedCoordination and support mechanisms in place	Effective Local Government Involvement
6. Third party auditor approval and management framework developed	<ul style="list-style-type: none">Other States/Territories emulate our modelA leading influence on national processEffective stakeholder contact on food issues	Recognised and Emulated Food Authority
7. Effective laboratory services in place	<ul style="list-style-type: none">Appropriate skills and age profileSkilled and competent staffRecruitment and succession strategy in placeSkilled & Balanced Workforce	Skilled & Balanced Workforce
8. Local Government model developed	<ul style="list-style-type: none">SecureSustainableDiverse Secure & Sustainable Funding	Secure & Sustainable Funding
9. Integrated communications model implemented		
10. Authority structure in place and resourced		
11. Staff selection, training and performance management program in place		
12. Corporate infrastructure implemented		
13. Results and Services Plan implemented		
14. Scheme development in three key areas complete to target stages		

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Strategic Pathways





NSW Food Authority
6 Avenue of the Americas, Newington NSW 2127
PO Box 6682, Silverwater NSW 1811
Tel: 02 9741 4777 Fax: 02 9741 4888
Internet: www.foodauthority.nsw.gov.au
Consumer and Industry Contact Centre
Tel: 1300 552 406
Fax: 02 9647 0026
Email: contact@foodauthority.nsw.gov.au
Office hours are from 8.30am to 5.00pm Monday to Friday
Photography by Andrea Francolini.