

General Circular

General Circular 03/2014

An important update from the NSW Food Authority (the Authority) for all NSW shellfish licensees.

New systems audit model for the shellfish sector

The Authority regularly reviews licensee audit programs to

- ensure the systems apply effective food safety controls; and
- tailor audit programs in sectors with demonstrated sustained levels of compliance.

The Authority has developed a new systems audit model which provides for online reporting that will capture production data and food safety program information to better inform us on shellfish sector compliance. This will enable the Authority to improve its capacity to identify trends in audit findings across the entire shellfish industry and act earlier on incidents of non compliance, resulting in improved food safety outcomes in the shellfish sector.

The new systems audit approach also presents an opportunity to recognise 'earned recognition' as it will provide an overall view of compliance of local area programs and individual licensees.

There will be NO changes to the way licensees conduct their operations. Licensees are still required to submit their product record sheets monthly in line with the current process.

Other benefits of the new model include:

- the ability to **continually** check harvest records throughout the year to ensure no food safety breaches have occurred. These currently take place annually, at the time of audit
- ensures harvesters are informed in a timely manner of any defects so that they can take immediate corrective action
- removes the necessity to assess harvest records against Key Food Safety Indicators (KFSI) when conducting biannual estuary audits (as these will be done continually throughout the year and any issues will be dealt with by phone and/email). This allow for the focus at the time of audit to be on facility and equipment issues sighted during the audit.
- provides the Authority with the ability to focus on estuary wide issues
- provides the Authority with capacity to focus on illegal activity as opposed to normal audit issues.

This new approach will include the ongoing surveillance of the shellfish sector to determine if business systems are compliant and are managing their own food safety program. This will involve the use of KFSI's together with a combination of on site and off site verification methods – detailed below.

System verification and surveillance

The Authority will conduct a system verification program to ensure the integrity of the model. This will involve a combination of:

- scheduled verification audits of estuaries
- surveillance activities based on past history, and
- spot checks.

The Authority will also conduct ongoing surveillance including:

- regular monitoring of KFSl's at the processor / farm level for that local area, and
- staged interventions depending upon risk.

All shellfish primary production businesses will continue to be responsible for the:

- implementation of a food safety program (FSP) depending upon the primary production processing standard (PPPS) with a food safety management statement at a minimum.
- completion of an annual internal audit of their program, and
- compliance with reporting and monitoring requirements as per the systems verification model, such as submitting product record sheets monthly to the Authority.

On site audit

A component of the surveillance program includes an on site audit of a percentage of the shellfish sector each year, with an initial audit of 50% of estuaries. An audit schedule will be developed each year and those estuaries involved will be notified in writing of the audit dates. The audits will include a review of the food safety program, shellfish harvesting records and the inspection of the premises and equipment. All non compliance will be dealt with through additional audit/s resulting in enforcement action if applicable.

Benefits to industry

The Authority is confident that this system will deliver increased compliance outcomes compared with the current audit system. It will enable improved data reporting on compliance to review industry/estuary performance over time. The system is responsive and flexible and will benefit the sector by:

- rewarding sustained performance
- reducing audit costs
- enabling businesses to plan around the audit process.

Enquiries

Please direct any enquiries to:

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