

Guidance on Audits

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Introduction

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

The aim of this document is to provide authorised auditors with a consistent approach that can be used when conducting audits at licensed food businesses. This guidance document can also be used by food businesses to understand the compliance audit model process, why defects are identified during audits, and their impact on food safety.

This guidance is based on the requirements of the Food Regulation 2015, Australian New Zealand Food Standards Code (the Code) and industry specific standards identified below:

- **Meat transport vehicles, abattoirs, meat processors**
 - [AS 4696-2007 - Hygienic Production and Transportation of Meat and Meat Products for Human Consumption,](#)
 - [AS 4465-2006 - Construction of Premises and Hygienic Production of Poultry Meat for Human Consumption](#) (available at www.publish.csiro.au)
- **Retail meat premises**
 - [NSW Standard for Construction and Hygienic Operation of Retail Meat Premises \(PDF\)](#)
- **Dairy processing facilities – pasteurisation**
 - [AS 3993-2003 - Equipment for the pasteurisation of milk and other liquid dairy products – Continuous-flow systems](#) (PDF)
 - [ANZDAC – Australian Manual for the Validation and Verification of Heat Treatment Equipment and Processes](#) (PDF)
- **Shellfish**
 - [NSW Shellfish Industry Manual \(PDF\)](#)

This document does not provide industry specific guidance for a number of industries regulated by the Food Authority, including game meat business, knackerries, wild shellfish harvesters, food transportation, or primary production business such as dairy, egg, and poultry.

Table 5. General audit guidance contains information that will be used across common elements for all Schemes. The following tables contain industry specific guidance on requirements and issues specific to each Scheme:

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What is an audit?

An audit is a process where an authorised auditor visits a facility to assess food safety compliance. During the audit the auditor carries out an inspection of the facility, observes the food handling practices, and reviews food safety documentation (including the Food Safety Program and monitoring).

Who carries out an audit?

Audits on licensed business will be carried out by an auditor authorised by the Food Act 2003. Authorised auditors may be contracted to carry out audits on behalf of the Food Authority (Third Party Auditors), or may be employees of the Food Authority. Food Authority employed auditors are also authorised officers under the Food Act 2003 and can carry out the functions of an authorised auditor and authorised officer concurrently. Food Authority employed auditors carrying out audits of export registered establishments are also authorised officers under the Export Control Act 1982.

What is in the audit?

During an audit, the auditor will check that:

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

The auditor has a list of areas that have to be checked. If an area is not of an acceptable standard, the auditor will raise a Corrective Action Request (CAR). Photos are taken as evidence for CARs as well as other general photos. Each CAR is rated and has points allocated to it. The number of points allocated will depend on whether the officer rates the element to be 'critical', 'major' or 'minor'. The points allocated for each of the categories are:

Critical defect – 64 points

A critical defect means a failure to:

- a. Comply with the requirements of Codes of Practice or a Standard that is very likely to result in, or has resulted in, the production of unwholesome food; or
- b. Comply with the requirements of the Standards with regard to labelling or the trade description of food; or
- c. Comply with corrective action request for a major non-conformance within the stated time.

Defects that fall into this category include:

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

Major defect – 8 points

A major defect means a failure to comply with the requirements of a Standard, Code of Practice and/or legislative requirements that is likely to result in the production of unwholesome food or inaccurately labelled food but is not a critical defect. Defects that fall into this category include:

- ineffective pest control, inadequate cleaning program
- major non-compliance with established hygiene standards
- inadequate control of food or ingredients during preparation or processing
- variation from the procedures documented, inaccurate calibration procedures
- another defect which could compromise wholesomeness of processed food or result in inaccurately labelled food.

Minor defect – 2 points

A minor defect means a failure to comply with the requirements of a Standards or a Code of Practice referred to in legislation that could result in the production of unwholesome food or inaccurately labelled food but is not a major or critical defect.

When deciding what rating to apply to a non-conformance, an auditor will take into account a number of factors:

- the degree of food safety risk of the non-conformance; including food types, business size and distribution, consumer of the food (general or vulnerable population).
- the overall standard of the facility, the food safety systems, and food safety culture of the business.
- overall compliance and non-conformance history of the business e.g. is it a recurring issue.
- the business's ability and attitude to taking corrective action in response to the non-conformance.

CAR Escalation

If a business fails to rectify any Corrective Action Requests (CAR) or defect identified during an audit by the required timeframe, or the same issue is observed by an auditor at two consecutive audits, the CAR rating may be escalated. This means a minor will be escalated to a major, or a major escalated to a critical. If the failure to implement effective corrective actions is threatening food safety, auditors will use discretion and may escalate an issue directly to the critical category.

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

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

How is the audit outcome determined?

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

Audit rating

Table 1. Audit rating

Rating	Total allocated points	Audit results
A	0-15	ACCEPTABLE
B	16-31	ACCEPTABLE
C	32-47	MARGINAL
D	48-63	UNACCEPTABLE
E	64 and above	UNACCEPTABLE

How often are routine audits if the business achieves an acceptable result?

Existing licensed business have regular audits carried out based on the compliance audit model. New businesses are audited based on the licensing audit model, where audits are carried out at a higher frequency to ensure that all new licensees can demonstrate long-term compliance with legislative requirements. Further information about the licensing audit model can be found on [the Food Authority website](#).

The frequency of audits under the compliance audit model will depend upon the type of business (a Priority 1 or 2 businesses) and the rating received at last audit. More information on Priority Classifications of food businesses can be found [on the Food Authority website](#).

Compliance audit frequency

Table 2. Compliance audit frequency

Rating	Priority 1	Priority 2
A	12 months *	24 months **
B	6 months	12 months
C	3 months	6 months

*6 months for Export Registered Establishments

**12 months for Export Registered Establishments

Unacceptable audit frequency

Table 3. Unacceptable audit frequency

Rating	Follow up audit(s)	Unacceptable follow up audit	Acceptable follow up audit
D or E	1 month	Remain on 1 monthly audits and additional enforcement action	Return to original audit schedule (prior to initial D or E rated audit)

Recommended enforcement action

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

Unacceptable audit outcome

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

Enforcement action will be taken by an authorised officer, in accordance with [Compliance and Enforcement Policy \(PDF\)](#). This may include, but is not limited to the following:

- **A verbal or written warning** – the business is warned that further non-conformance may result in further enforcement action being taken.
- **An Improvement Notice** - the business is given a period of time to fix a non-conformance before an authorised officer returns to check that the issue has been addressed and is compliant. The timeframe is determined by the authorised officer based on the food safety risks posed by the non-conformance and the expected time taken to rectify the issue. Timeframes can range from 24 hours up to 12 months. If the non-conformance/s is/are not rectified within the specified timeframe, the authorised officer can issue a Penalty Notice and/or a Prohibition Order (see below). A fee is attached to all Improvement Notices to cover the expense of conducting a follow-up inspection to ensure the non-compliance has been rectified. Any additional inspections that may be required to verify compliance with an Improvement Notice will attract further costs.
- **A Penalty Notice** – the business is given a fine for the non-conformance identified during the audit. Fines range in severity depending on the nature of the offence and multiple fines may be issued. Fines are normally issued in conjunction with other enforcement actions to ensure that long term compliance with food safety standards is achieved. The business can also be placed on the Name & Shame register which is published on the Food Authority website.
- **A Prohibition Order** – this can be issued on a business where serious non-conformances are identified. This order means that the business cannot operate at all, produce a specific type of food, use a specific process, or use certain equipment, for a period of time. The time period can range from 24 hours, up to permanent prohibition from operating.
- **Prosecution** – the Food Authority will commence legal proceedings against a business for continued failure to comply with food safety standards and/or failure to produce safe and suitable food. The business can also be placed on the Name & Shame register which is published on the Food Authority website.

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

Acronyms

AA – Approved Arrangement	MICoR – Manual of Imported Country Requirements
AO – Authorised Officer	MTC – Meat Transfer Certificate
AQL – Acceptable Quality Level	NATA – National Association of Testing Authorities
AS – Australian Standard	NLIS – National Livestock Identification System
AW – Animal Welfare	NSW – New South Wales
AWO – Animal Welfare Officer	NVD – National Vendor Declaration
CAR – Corrective Action Request	PGOs – Prescribed Goods Orders
CPU – Central Processing Unit	PR – Product Record
DAFF – Commonwealth Department of Agriculture, Fisheries and Forestry	RFP – Request For Permit
ERP – Extended Residue Program	PHF – Potentially Hazardous Food
EU – European Union	RTD – Resistance Temperature Detectors
FSC – Food Standards Code	RTE – Ready-to-eat
FSO – Food Safety Officers FSP – Food Safety Program	SO ₂ – Sulphur dioxide (and derivatives)
FSSM – NSW Food Safety Schemes Manual	SRO – Sydney Rock Oyster
GMP – Good Manufacturing Practice	TC – Transfer Certificate
HTST – High Temperature Short Time	TD – Transfer Declaration
ID – Identification	UCFM – Uncooked Comminuted Fermented Meat
MAP – Modified Atmosphere Packaging	UV – Ultra Violet
MHA – Meat Hygiene Assessment	VP – Vulnerable Populations

Audit guidelines – Key areas considered during an audit

Table 4. Audit guidelines - Key areas considered during an audit

Facility	Key areas to consider
Abattoir	<ul style="list-style-type: none"> • Legal Requirement: AS4696 Red Meat, AS4465 Poultry, AS4466 Rabbit, plus Animal Welfare. • Food Safety Program: Yes, drafted by business. • Food Safety Controls: <ul style="list-style-type: none"> • Carcase chilling (refer to relevant Australian Standard). • Temperatures: <ul style="list-style-type: none"> ○ Carcases no warmer than 7°C on surface. ○ Carcase parts no warmer than 5°C at site of micro concern. ○ During processing surface temp warmer than 7°C, or carried out in environment no warmer than 10°C. • Washing and chilling temperatures and residual chlorine in spin chillers (poultry). • Meat inspection. • Traceability (e.g. NLIS for red meat). • Testing: <ul style="list-style-type: none"> • All – Water, as per FSSM. • Verification: <ul style="list-style-type: none"> ○ Red meat – Carcase swabbing. ○ Poultry – Work surfaces (as part of Australian Standard) & carcase swabbing.
Meat Processor	<ul style="list-style-type: none"> • Legal Requirement: AS4696 Red Meat, AS4465 Poultry. • Food Safety Program; Yes, drafted by business • Food Safety Controls: <ul style="list-style-type: none"> ○ Temperatures: <ul style="list-style-type: none"> ▪ Carcases no warmer than 7°C on surface.

Facility	Key areas to consider
	<ul style="list-style-type: none"> ▪ Carcase parts no warmer than 5°C at site of micro concern. ▪ During processing surface temp warmer than 7°C, or carried out in environment no warmer than 10°C. ▪ Cooking, 65°C for 10 minutes (or equivalent). ▪ Cooling: <ul style="list-style-type: none"> • Cured meat is reduced from 52°C to 12°C within 7.5 hours; and 5°C within 24 hours of completion of cooking • Uncured meat is reduced from 52°C to 12°C within 6 hours; and 5°C within 24 hours of completion of cooking. ○ Listeria management processes for vacuum or MAP packed RTE meats. ○ Special requirements for UCFM processors (approval of each product subject to proforma). • Testing: <ul style="list-style-type: none"> ○ Verification: <ul style="list-style-type: none"> ▪ Work surfaces. ▪ Product specific pathogens outline in FSSM. ○ Validation: • Shelf life.
Retail Butcher Shop Retail Butcher Shop cont..	<ul style="list-style-type: none"> • Legal Requirement: NSW Standard for Construction and Hygienic Operation of Retail Meat Premises. • Food Safety Program: Yes, generic program drafted by NSW Food Authority (must be customised). • Food Safety Controls: <ul style="list-style-type: none"> ○ Temperatures: <ul style="list-style-type: none"> ▪ Carcasses and quarters no warmer than 7°C on surface. ▪ Carcase parts no warmer than 5°C at site of micro concern. ▪ During processing surface temp warmer than 7°C, or carried out in environment no warmer than 10°C. ▪ Cooling, 65°C for 10 minutes (or equivalent). ▪ Cooling:

Facility	Key areas to consider
	<ul style="list-style-type: none"> • Cured meat is reduced from 52°C to 12°C within 7.5 hours; and 5°C within 24 hours of completion of cooking. • Uncured meat is reduced from 52°C to 12°C within 6 hours; and 5°C within 24 hours of completion of cooking. ○ Listeria management processes for vacuum or MAP packed RTE meats. ○ Special requirements for UCFM processors (approval of each product subject to proforma). • Testing: <ul style="list-style-type: none"> ○ SO₂ testing and sampling will be carried out by the AO on meat products (mince, sausages and other products). ○ Verification: <ul style="list-style-type: none"> ▪ Product specific pathogens outline in FSSM. ○ Validation: • Shelf life.
<p>Dairy Processor</p> <p>Dairy Processor cont..</p>	<ul style="list-style-type: none"> • Legal Requirement: Food Standards Code 4.2.4 (processing), 3.2.2, 3.2.3 premises and practices. ANZDAC Guideline for Food Safety: Validation and Verification of Heat Treatment Equipment (including AS3993:2003 for HTST pasteurisation). • Food Safety Program: Yes, drafted by business. • Food Safety Controls: <ul style="list-style-type: none"> ○ Times and temperatures: <ul style="list-style-type: none"> ▪ Pasteurised milk products, 72°C for no less than 15 seconds. ▪ Pasteurised milk for cheese, 64.5°C for no less than 16 seconds, and the cheese product stored at no less than 7°C for no less than 90 days. ▪ OR equivalent validated time and temperature. ▪ Cooling – shock cooling OR cooling within two hours – from 60°C to 21°C; and within a further four hours – from 21°C to 5°C. ▪ Raw milk cheeses, specific controls in Food Standards Code 4.2.4. • Testing:

Facility	Key areas to consider
	<ul style="list-style-type: none"> • Food Safety Controls: <ul style="list-style-type: none"> • All harvest must be carried out when area is in OPEN status. • Date, time, and harvest area must be fully documented in Product Record (PR) book. • Temperatures: <ul style="list-style-type: none"> ○ Sydney Rock oysters: <ul style="list-style-type: none"> ▪ After depuration/harvest, stored at less than 25°C up to 72 hours and then placed at less than 21°C. ○ Pacific oysters, Native Flat oysters, mussels and all other shellfish: <ul style="list-style-type: none"> ▪ After depuration/harvest, are placed at less than 10°C within 24 hours. • Depuration must be carried out for a minimum of 36 hours. • Full documentation of Relay (minimum 14 days), or Translocation (minimum 60 days) if carried out. • Special traceability. • Testing: <ul style="list-style-type: none"> • Verification: <ul style="list-style-type: none"> ○ E.coli test to be carried out on shellfish once every calendar month in which a depuration is carried out.
<p>Vulnerable Populations Facility</p> <p>Vulnerable Populations Facility cont..</p>	<ul style="list-style-type: none"> • Legal Requirement: Food Standards Code 3.2.1 Food Safety Program, 3.2.2, 3.2.3 premises and practices. • Food Safety Program: Yes, drafted by business. • Food Safety Controls: <ul style="list-style-type: none"> ○ Temperatures: <ul style="list-style-type: none"> ▪ Potentially Hazardous Food 5°C or below; or 60°C or above. ▪ Frozen food remains frozen. ▪ Pathogens control step is reasonably known to achieve the microbiological safety of the food (e.g. Cooking, 65°C for 10 minutes (or equivalent)). ▪ Reheated food rapidly heated to a temperature of 60°C or above.

Facility	Key areas to consider
Fruit and Vegetable Processor	<ul style="list-style-type: none"> • Validation. • Legal Requirement: Food Standards Code 3.2.1 Food Safety Program, 3.2.2, 3.2.3 premises and practices. • Food Safety Program: Yes, drafted by business. • Food Safety Controls: <ul style="list-style-type: none"> ○ Temperatures: <ul style="list-style-type: none"> ▪ Potentially Hazardous Food 5°C or below; or 60°C or above. ▪ Pathogens control step is reasonably known to achieve the microbiological safety of the food (e.g. sanitiser concentration, Cooking/heat treating 65°C for 10 minutes (or equivalent)). ○ Final product water activity/pH. • Testing: <ul style="list-style-type: none"> ○ Verification: <ul style="list-style-type: none"> ▪ Product specific pathogens outlined in FSSM. • Validation.

General audit guidance

Table 5. General audit guidance

Category		Minor	Major	Critical
Food Safety Program	Licence		Licence permission incorrect for activities sighted during audit (e.g. other commodity, transport).	Licence permission incorrect for high risk activities sighted (e.g. UCFM).
	Food Safety Program (FSP)	FSP has not been authorised by licensee of the business.	No FSP available at audit but daily monitoring records are available (Generic FSPs only).	FSP not available at audit and no monitoring records completed >2 months (Generic FSPs only).
				No FSP available at audit.
		FSP has not been customised to reflect current operations (minor details missing/changed).	FSP has not been customised to reflect current operations (major process missing/changed e.g. not high risk/RTE product, similar process with similar controls).	FSP has not been customised to reflect current operations (significant/critical processes missing/changed, e.g. addition of high risk/RTE product, new process with critical step).
			Hazards, control measures, or corrective action not sufficiently identified or monitored.	Hazards, control measures, or corrective action not sufficiently identified or monitored (significant food safety risk).
Hygiene & Sanitation	Hygiene	The hygiene system failed to prevent minor or small number of hygiene issues observed.	The hygiene system failed to prevent major or moderate number of hygiene issues observed, including food contact surfaces.	The hygiene system failed to prevent critical hygiene issues observed with significant visible matter/contamination on a large number of surfaces, fixtures, fittings and equipment, including RTE food contact surfaces.
		Hygiene and sanitation program and procedures not adequately documented.	The hygiene program did not identify and/or rectify hygiene issues observed.	

Category		Minor	Major	Critical
Hygiene & Sanitation cont.	High Risk/RTE Products			High risk food contact surfaces have not been cleaned or sanitised (slicer, RTE cutting boards, equipment, and RTE storage area).
	Construction & Maintenance	Construction & Maintenance	The construction and maintenance system failed to prevent minor or small number of issues observed. Issues unlikely to contaminate food (walls, ceiling, floor, rails).	The construction and maintenance system failed to prevent major or moderate number of issues observed. Issues have increased likelihood to contaminate food.
		Construction and maintenance program and procedures not adequately documented.	Construction and maintenance program did not identify and/or provide timely rectification of construction and maintenance issues.	
Hand Wash		Hand washing facilities are present however one of the following is not present: Hand drying facilities Non-hand operated taps (meat business only).	Hand washing facilities are not provided with warm running water (temporary issue).	Hand washing facilities are not present or are not easily accessible. Hand washing facilities are not operational. Hand washing facilities are not connected to or provided with warm running water.

Category		Minor	Major	Critical
Process Control	Monitoring	Some monitoring records missing or incomplete < 1 week (low food safety risk).	No monitoring records for > 1 week < 2 months (low food safety risk).	> 2 months or no monitoring records at all (low food safety risk), missing or incomplete records (high/critical food safety risk).
		The business has failed to rectify defects identified through monitoring.	Records do not reflect the condition of the premises (hygiene, maintenance and process records are not accurate).	
	Cooking Temperatures		No cook/cool records of non RTE products (pies, soups, casseroles etc.)	Cooking temperatures have not achieved 65°C for 10 minutes or equivalent.
			No cooking/drying records for RTE products for 5 batches.	No cooking records for RTE products for >5 batches.
			Cooling verification records not carried out at frequency in the FSP.	No cooling verification records available.
				Cooked food products have not been cooled in accordance with the cooling requirements (or validated alternative).
				Storage equipment in facility is not functional and cannot maintain meat under temperature control.
	Ingredients		Products or ingredients/marinades are stored or being used after their use by date.	Products being sold or displayed for sale after the use by date.

Category		Minor	Major	Critical
Process Control cont..	Cross Contamination		Tubs on the floor, tub lids not closed, ingredient bags not sealed.	Significant food safety risk was identified.
			RTE products touching fixtures, fittings and not stored in a way that prevents cross contamination.	RTE products visibly contaminated by raw products or other contaminants.
			Business is not preventing cross contamination.	
			Strings/packaging unclean or not used or stored to prevent contamination.	
ID & Traceability	Disposal of food		Food for disposal is not held/kept separate or identified.	
	Traceability		The traceability program cannot ensure that all inputs, ingredients and outputs can be traced.	No batch coding in place for RTE food products.
	Recall		The business does not have a documented recall system (does not apply to retail businesses).	Recall system has not been effective in recalling unsafe food.
	Labelling		No Country of Origin labelling on packaged product.	Allergens not identified or declared on labelling.
			Important product information missing on packaged product (e.g. Business name and address).	Date labelling altered/tampered on displayed product.
			No identification of ingredients and/or marinades on value added product.	
			No Nutrition Information Panel on value added product.	

Category		Minor	Major	Critical
Analytical & Testing	Testing	Testing reagents or equipment not within usable shelf life.	Business has not conducted testing in compliance with their FSP/FSSM (pathogen verification testing, water) – 1 test missed.	Business has not conducted testing in compliance with their FSP/FSSM - >2 tests missed.
		Business has not adequately documented testing.	Business has not conducted testing at a NATA registered laboratory.	Business failed to implement appropriate corrective action as a result of unacceptable test.
			Business has not conducted shelf life testing /pH testing/ water activity testing as outlined in the FSP.	The facility has not notified the Food Authority of a failed test (verbal 24 hours, written 7 days).
Pre-requisite Programs	Calibration	Temperature measuring equipment has not be calibrated at frequency identified in the FSP.	Thermometer/pH meter has not been calibrated as outlined by manufacturer's instructions or at a minimum of every 12 months.	A thermometer is not operational or available.
	Pest Control	Treatments not carried out as per the FSP, or no pest control treatments carried out for >6 months.	No pest control system (with no evidence of pests) or no pest treatment carried out for >12 months.	The pest control program has failed to prevent visible pest infestation or high levels of pest activity in facility: evidence of harbourage evidence of breeding failure to prevent entry of pests inadequate or no pest control programs evidence of droppings, smears.
		Some pest treatment reports missing or not sufficiently detailed (pests and areas treated, chemicals used).	No pest treatment reports available.	

Category		Minor	Major	Critical
Pre-requisite Programs cont..	Internal Audit	Internal audit has not identified deficiencies in the Food Safety Systems.	No internal audit conducted for >12 months.	
	GMP	No soap or hand drying available at hand wash.	No soap or paper towel available in facility.	
		Hand wash basin not exclusively used for washing hands, arms and face.	Employee clothing unclean or damaged.	
	Training	Staff not identified in the training matrix.	Staff are not competent in their duties.	
	Allergens		Allergens not identified or controlled in processing.	
	Chemicals	Note: Readily available chemicals (pest control and cleaning) are OK to be used so long as they do not contaminate food or food contact surfaces.	Unsuitable chemicals used in facility and/or not used per manufacturer instructions.	No cleaning chemicals available in the facility.
Corrective Action	Previous CARs	Business has failed to document action taken against CARs raised during previous audit.	Business has failed to rectify MINOR CARs issued at previous audits.	Business has failed to rectify MAJOR CARs issued at previous audit.

Meat processing facilities

Table 6. Meat processing facilities

General Audit Guidance		Red Meat	Non-Red Meat	
Category	Minor	Major	Critical	
	SO ₂		SO ₂ positive field test. Samples and enforcement action will be taken.	
Process Control	Monitoring	Carcase cooling records incomplete.	No carcase cooling records.	
	Temperatures	Temperature of raw product >10 but <15°C above critical limit. Carcases loaded into transport >7°C quarters or larger, >5°C boxed meat or smaller than quarters.	Temperature of raw product >15°C above critical limit.	
	RTE Products	Temperature of RTE products 5°C -10°C.	Temperature of RTE product >10°C.	
	Processing		Poultry wash water >18°C (single event/short time period during processing)	Poultry wash water >18°C (multiple event/extended time period during processing).
			Spin chiller water > 4°C (single event short time period during processing).	Spin chiller water > 4°C (multiple event/extended time period during processing).
			Carcases or carcase parts not chilled as outlined in the Australian Standard.	Spin chillers and/or washer do not have a detectable level of free residual chlorine.
Listeria Management	Post pack pasteurisation temperatures not recorded.	Non-compliance with Listeria controls (e.g. post pack pasteurisation).		

General Audit Guidance		Red Meat	Non-Red Meat	
ID & Traceability	Cross Contamination	Dressing controls failed to prevent significant minor contamination on carcase or carcase parts (not zero tolerance defects).	Dressing controls failed to prevent moderate contamination on carcase or carcase parts (including zero tolerance defects).	Dressing controls failed to prevent significant or large number of carcase or carcase parts being contaminated with zero tolerance defects.
		Staff not correctly sterilising knives.	Slaughtering and dressing not carried out in a manner which prevents contamination.	
	AQL/MHA		AQL/MHA system is not identifying and removing dressing defects.	
	Meat Inspection		Meat inspector not correctly applying inspection procedures or identifying diseases and contamination.	
	Traceability		Condemned animals not documented.	Animals slaughtered without a valid NVD or traceability information.
	NLIS		Slaughter data not uploaded to NLIS database < 7 days.	No data uploaded to NLIS database > 7days.
			ERP check not carried out on all cattle consignments.	Animal with ERP status slaughtered and dispatched without system identifying and testing.
	Labelling		Carcase or carcase parts not correctly branded or traceable.	Missing or stolen official marks not reported to the Food Authority within 24 hours.
			Inedible and pet food not correctly banded and labelled (red/yellow).	

General Audit Guidance			Red Meat	Non-Red Meat	
Analytical & Testing	Testing		Dried meat products have not been tested for water activity levels Jerky/Biltong - <0.85 aW Prosciutto/Speck/Coppa - <0.92 Aw		
Pre-requisite Programs	GMP	Staff not wearing hair and beard coverings.			
		Knife kits not clean or maintained free of rust or damage.			
	Training			No evidence of Stun Stick Shackle or AWO training or certification available during audit.	
	Animal Welfare (abattoir only)	Animal welfare controls not sufficiently documented.	Animals not effectively stunned and insensible to pain at slaughter.		Animals not humanely slaughtered.
		Animal welfare checks not documented as outlined in the FSP (< 1 week).	Animal welfare checks not documented as outlined in the FSP (> 1 week).		No animal welfare monitoring available.
		Animal holding areas not effectively maintained.	Animals not effectively restrained to allow for effective stunning.		Staff observed abusing or mistreating animals.
		Goads, restrain, stun and slaughter equipment not sufficiently maintained.	Animals not penned/caged to minimise pain, stress, or injury.		Stun, stick and shackle carried out by untrained operator.
No notifiable disease procedure.		Animals not moved/hung to minimise pain, stress, or injury.		No AWO on site during slaughtering.	

Note: Personnel can carry out stunning, sticking or shackling prior to completing or receiving certificate for recognised course as long as they have completed onsite training and are deemed competent by AWO. Personnel must complete recognised course within 6 months of commencing these tasks.

Export registered meat facilities

Guidance for both red meat and non-red meat industries can be found on the federal Department of Agriculture, Fisheries and Forestry (DAFF) [website](#):

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

Table 7. Export registered meat facilities

General Audit Guidance		Red Meat	Non-Red Meat
Category	Minor	Major	Critical
Registration	Approved Arrangement (AA)	Organisation structure, responsibilities, authorities, and commitment to export legislation not documented.	
	Certificate of registration	<ul style="list-style-type: none"> • Certificate of registration does not have current personnel, processes, or country listing (if required). • RFP validators not currently on certificate of registration. • Importing country requirements not available for all countries exported to. 	

General Audit Guidance			Red Meat	Non-Red Meat
ID & Traceability	Halal	Halal program is not sufficiently documented or audited (if required).	Halal and non-Halal meat not identified and segregated.	
	MTCs	Not all MTCs reconciled (within 21 days).	MTCs not reconciled (within 21 days). MTCs have not been completed correctly, i.e. product descriptions, weights, types of packaging chilled or frozen etc. MTC signed by person not approved under AA. MTC has incomplete or incorrect market eligibility.	
	Official Marks	Official marks not accounted for or reconciled weekly.	Official marks and marking devices (printers) not secure.	Missing or stolen official marks.
			Official marks and resemblances do not comply with PGOs.	Official marks on product not eligible for export (from non-export chain establishment/process).
Analytical & Testing	Testing		Non-compliance with importing country testing requirements.	The facility has not notified the Food Authority and DAFF of a failed test (verbal 24 hours, written 7 days).
		Water testing not carried out monthly.	No corrective action taken in response to failed water test (no food safety risk evident).	No corrective action taken in response to failed water test (food safety risk evident or likely).
		Water testing not carried out quarterly.		

Dairy processing

Table 8. Dairy processing

Category		Minor	Major	Critical
Process Control	Monitoring		Divert valves not checked daily on continuous flow pasteurisers (<1week).	Continuous flow pasteuriser records missing or incomplete (>1 week).
				Batch pasteuriser records missing or incomplete (>1 week).
				Head space temperatures not monitored (>1 week).
	Temperature	Temperature of raw milk received >5°C without appropriate corrective action.	Temperature of raw milk received >10°C without appropriate corrective action.	Dairy products have not been heated in compliance with Food Standards Code requirements (chapter 4.2.4). (72°C for 15 seconds –milk/64.5°C for 16 seconds-cheese or validated equivalent).
			Potentially hazardous food dispatched >5°C.	Dairy products have not been cooled in compliance with Food Standards Code requirements (chapter 4.2.4).
	Processing		Dairy products not processed in accordance with AS3993 and ANZDAC guideline requirements (monitoring, time/temperature, pressure differential, leak detection (duo plate only)).	Finished cultured products did not reach a pH <4.5.
Ingredients	Ingredients		Ingredients or cultures used after their use by date.	

Category		Minor	Major	Critical
Analytical & Testing	Testing		Pasteurisation validation not carried out on milk and cream (i.e. Phosphatase testing).	
	Pre-requisite Programs	Calibration	Thermometer has not been calibrated for 6 months (batch pasteuriser and other thermometers).	
Thermometers, RTDs, recording pens, pressure gauges and temperature gauges on the pasteuriser have not been calibrated in accordance with AS3993 (HTST pasteurisation only).			Thermometers, RTDs, recording pens, pressure gauges and temperature gauges on the pasteuriser not available or operational at time of audit.	

Export registered dairy facilities

Guidance for export facilities can be found on the federal [Department of Agriculture Fisheries and Forestry \(DAFF\) website](#), and the [Manual of Importing Country Requirements \(MICoR\)](#)

Table 9. Export registered dairy facilities

Category		Minor	Major	Critical
Registration	Approved Arrangement (AA)	Organisation structure, responsibilities, authorities, and commitment to export legislation not documented.	Significant change to AA or process has not been communicated to relevant authority.	Approved Arrangement (AA)
	Certificate of Registration	Certificate of registration does not have current personnel, processes, or country listing (if required). Importing country requirements not available for all countries exported to.		Certificate of Registration
ID & Traceability	TC/TDs		Transfer certificates not correctly completed. Transfer certificates not identifying country eligibility. Transfer certificates not available for incoming dairy ingredients.	
Analytical & Testing	Testing		Non-compliance with importing country testing requirements (e.g. Bulk milk, and pathogen testing every batch for EU).	The facility has not notified the Food Authority and DAFF of a failed test (verbal 24 hours, written 7 days).
		Water testing not carried out monthly.	No corrective action taken in response to failed water test (no food safety risk evident).	No corrective action taken in response to failed water test (food safety risk evident or likely).

Vulnerable populations

Table 10. Vulnerable populations

Category		Minor	Major	Critical
Process Control	Monitoring		No cooking records for 5 batches. No cooling verification records available for 5 batches.	No cooking records > 5 batches. No cooling verification records available for > 5 batches.
	Temperature	Temperature PHF received >5°C without appropriate corrective action.	Temperature PHF received >10°C without appropriate corrective action (discarding).	Food not cooled in accordance with requirements of the Code.
		Frozen PHF not stored at temperatures identified on manufactures label or hard frozen.	PHF stored out of temperature control (>5°C - <60°C) or safe alternative (4 hour/2hour).	
			Cooked chilled food not cooled in accordance with the validated cooling procedure (e.g. extended shelf life cook-chill, short shelf life cook chill).	Food not cooked for a validated time/temperature (i.e. as outlined in the Guidelines for Food Service to Vulnerable Persons or alternative [e.g. extended shelf life cook-chill]).
	Processing		PHF not thawed under temperature control or safe alternative.	Business has not controlled the risks associated with high risk foods (e.g. process, shelf life, listeria).
			PHF thawed, cook chill, leftovers, sandwiches, liquid supplements, not used within a valid shelf life (i.e. as outlined in Guidelines for food service to vulnerable populations or an alternative).	Vitamised food/nutritional supplements have not been maintained under temperature control.

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

Seafood processing

Table 11. Seafood processing

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

Shellfish harvesting

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

Table 12. Shellfish harvesting

Category		Minor	Major	Critical
Food Safety Program	Licence		License permission incorrect for activities sighted during audit (e.g. other commodity, transport).	Licence permission incorrect for activities sighted (deuration harvest and hold).
	Food Safety Program		Incorrect generic FSP available for activities carried out (harvest and hold).	No FSP available at audit.
Process Control	Monitoring	Estuary or zone not filled in PR book	Time of harvest not filled in PR record (with no closures on that date).	Time of harvest not filled in PR record (with closures on that date).
				Date not filled in PR book.
			Depuration section incomplete density and salinity not recorded.	Depuration section incomplete times or dates recorded.
			Destination section of PR record not filled – 5 occasions.	Destination section of PR record not filled – > 5 occasions.
			Relay or translocation not fully recorded.	Oysters not depurated for minimum 36 hours.
				Relayed oysters sold before 14 days in conditionally approved zone (in open status for fully 14 days).
				Translocated oysters sold before 60 days in conditionally restricted/approved zone.

Category		Minor	Major	Critical
	Temperature	Temperature records are not filled in for oysters stored for >12 hours – 5 occasions.	Temperature records are not filled in for oysters stored for >12 hours- > 5 occasions.	Oysters not stored under required temps (SRO <25, others <10)).
	Cross Contamination		Oyster bags/boxes not stored protected from contamination.	Oysters ready for sale (bagged) not sufficiently washed to remove mud.
				Direct harvest oysters not washed.
ID & Traceability	Traceability		Translocated or relayed oysters not identified on lease maps.	Oysters for sale not identified with PR numbers.
	Labelling	No Country of Origin, business name and address, species or storage conditions labels or bags.	No Country of Origin labelling on oysters for sale.	No harvest date and location on oysters for sale.
			No business name and address on oysters for sale.	
			No species on oysters for sale.	
			No storage conditions on oysters for sale.	
Analytical & Testing	Testing		Depuration tank verification not carried out on first batch depurated after 3 months not using tank.	
Pre-requisite programs	Calibration	Thermometer meter has not been calibrated as outlined by manufacturer’s instructions or at a minimum of every 12 months.	Thermometer is not operational or available.	
		UV light life not documented.	UV light not operational at time of audit.	

Category		Minor	Major	Critical
	Chemicals	Note: Readily available chemicals (pest control and cleaning) are OK to be used so long as they do not contaminate food or food contact surfaces.	Unsuitable chemicals used in facility and/or not used per manufacturer instructions.	

Egg processing

Table 13. Egg processing

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

Category		Minor	Major	Critical
Pre-requisite Programs	Calibration		Thermometer has not been calibrated for 6 months (batch pasteuriser and other thermometers)	
			Thermometers, RTDs, recording pens, pressure gauges and temperature gauges on the pasteuriser have not been calibrated in accordance with chapter 6 of the NSW Food Safety Schemes Manual	Thermometers, RTDs, recording pens, pressure gauges and temperature gauges on the pasteuriser not available or operational at time of audit

Export registered egg facilities

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

Table 14. Export registered egg facilities

Category		Minor	Major	Critical
Registration	Approved Arrangement (AA)	Organisation structure, responsibilities, authorities, and commitment to export legislation not documented.	Significant change to AA or process has not been communicated to relevant authority.	
	Certificate of Registration	Certificate of registration does not have current personnel, processes, or country listing (if required). Importing country requirements not available for all countries exported to.		
ID & Traceability	TC/TDs		Transfer certificates not correctly completed. Transfer certificates not identifying country eligibility. Transfer certificates not available for incoming egg ingredients.	
Analytical & Testing	Testing		Non-compliance with importing country testing requirements.	The facility has not notified the Food Authority and DAFF of a failed test (verbal 24 hours, written 7 days).
		Water testing not carried out monthly.	No corrective action taken in response to failed water test (no food safety risk evident).	No corrective action taken in response to failed water test (food safety risk evident or likely).

Fruit and vegetable processing

Table 15. Fruit and vegetable processing

Category		Minor	Major	Critical	
Process Control	Monitoring		Pathogen control step not recorded for 5 batches (e.g. sanitising).	Pathogen control step not recorded for > 5 batches (e.g. sanitising).	
	Temperature		Finished product is not being rapidly chilled.		
	Processing			Pathogen control step not achieving critical limits.	
	Ingredients		Incoming product is not being inspected or recorded.		
	Fresh-cut fruit & vegetables			Produce is not being adequately graded and/or trimmed prior to processing.	
				Sorting and washing operations are not separated from processing areas.	
	Seed sprouts			Pre-screening is not being conducted on incoming seeds.	
				Business is not adhering to a documented sampling procedure for seed pre-screening.	
				Alfalfa seeds have not been sanitised for 10 minutes in 20,000ppm calcium hypochlorite solution.	

Category		Minor	Major	Critical
	Seed sprouts cont..		Seeds have not been sanitised for 10 minutes in 2000ppm calcium hypochlorite solution.	
	Vegetables in oil		Business is not verifying that pH of <4.6 is achieved for each batch.	
	Unpasteurised juices		Sorting and washing operations are not separated from processing areas.	
			Product is not sanitised prior to processing.	

NOTES:

Copyright and disclaimer statement

The NSW Food Authority is the regulator and source of truth for food safety in NSW, underpinned by science in an evidence-based approach from paddock to plate.

Note: This information is a general summary and cannot cover all situations. Food businesses are required to comply with all provisions of the Food Standards Code and the Food Act 2003 (NSW).

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