

Q&A

Vulnerable Persons Forum 16 November 2017

Question	Answer
Managing food safety in vulnerable persons businesses	
<p>We serve salamis and sliced meats.</p> <p>The meat is used within 24 hours of slicing and within 48 hours if the whole knob has not been sliced.</p> <p>Is this acceptable?</p>	<p>This is an acceptable process. The key point is that the meat is consumed within a safe time (e.g. 24 hours of slicing) and the process is validated and documented in your food safety program.</p> <p>Refer to pages 16-18 of the Guidelines for food service to vulnerable persons for information on acceptable control measures when serving high risk foods.</p>
<p>How do we manage risk when serving textured modified meals to vulnerable persons?</p>	<p>The Guidelines for food service to vulnerable persons (page 24) sets out procedures for managing risk when serving texture modified food.</p> <p>The Food Authority has also prepared a Preparation of texture modified food fact sheet.</p>

Question	Answer
<p>Can time control (e.g. serve within 2 hours) be used when serving pureed food that is pureed immediately after cooking and then served, therefore not requiring reheating after pureeing?</p> <p>The cook time of the meal, the cook temperature, and the serve time of the pureed food would be recorded in the food safety program.</p>	<p>Texture modification exposes food to the risk of contamination from equipment used for the texture modification process.</p> <p>If food is to be texture modified after cooking and while the food is still hot, it is recommended the temperature be checked after modification to ensure it is above 70°C for 2 minutes or implement a validated equivalent process.</p> <p>If the texture modified food is still above the critical limit, then time as a control measure can be used. If it is below this critical limit, then the food should be reheated prior to serving.</p>
<p>Where can we find guidance about shelf life after opening food with no other information except “refrigerate after opening”?</p>	<p>In relation to lower risk foods (e.g. high acid foods), all opened packages of food should be protected from contamination and used within their ‘use-by’ date and any instructions included on the label by the manufacturer must be followed (e.g. use within 2 days of opening), whichever is sooner.</p> <p>In the absence of label instructions, all opened and leftover food should be used within 48 hours. Some food may be suitable for up to 5 days if the facility can provide documented evidence of such shelf life (e.g. pH/ water activity values, microbial testing at the end of shelf life).</p> <p>Refer to page 19 of Guidelines for food service to vulnerable persons for information on storage of opened packages of food, condiments and ingredients.</p> <p>Higher risk foods (e.g. ready-to-eat meats) may require a shorter shelf life after opening than what the manufacturer recommends. For information on higher risk foods refer to pages 16-18 of the Guidelines for food service to vulnerable persons.</p>

Question	Answer
<p>How do we manage vulnerable persons who wish to consume high risk foods?</p>	<p>The Food Authority recognises residents' choice is a big issue in hospitals and aged care. Certain foods present a higher risk to vulnerable people due to increased potential for these foods to cause food poisoning.</p> <p>These foods require specific control measures to be implemented to minimise the potential risks. If you can demonstrate that the risk is addressed, there are all sorts of solutions available.</p>
<p>Why do the Guidelines for food service to vulnerable persons recommend a shelf life of 7 days for dips?</p>	<p>It depends on the type of dip. Yoghurt or sour cream based dips with a pH of 4.4 or lower will have a longer shelf life due to their acid content.</p> <p>Dips with a more neutral pH will have a shorter shelf life due to less acid in the product and their greater potential for growth of pathogens such as Listeria.</p>
<p>How do we manage residents that have refrigerators in their rooms used to store food brought in by friends and relatives?</p>	<p>While this food is not subject to Food Authority regulation, it is recommended facilities have a policy for managing food brought in from home by friends and relatives.</p> <p>The policy should ensure friends and relatives are made aware of the higher risk foods, and controls that can be commonly used for other foods they may bring in for patients or residents.</p>
<p>How do we manage fetes or fun days held on site at a vulnerable persons business?</p>	<p>Fetes or fun days held on the grounds of a vulnerable persons facility that are open to the public are not prohibited by the Food Authority and not within the scope of the Vulnerable Persons Food Safety Scheme.</p> <p>Facilities that run fetes or fun days should refer to our Markets and temporary events webpage for information about food safety requirements.</p>
<p>Where does the Food Authority stand on electronic monitoring records?</p>	<p>The Food Authority accepts electronic records. However, food businesses must ensure automatically collected data is monitored and corrective action taken when required.</p>



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<p>Which fruit and vegetables need to be washed with a commercial sanitiser?</p>	<p>Melons (rockmelon, cantaloupe, honeydew) should be washed and sanitised using a sanitiser appropriate for fresh produce.</p> <p>Further information about control measures for fruits, vegetables and salads can be found on page 17 of the Guidelines for food service to vulnerable persons.</p>
<p>In relation to cooling of food, in the vulnerable persons industry a lot of food is cooked at lunch-time and cooled into the afternoon. Often there is not sufficient staff to temperature check at the 6-hour mark.</p> <p>Would the Food Authority accept a verification of that process every three months based on some of the varying menu items that may be produced?</p>	<p>The problem with this type of validation is variance of product. There would be better ways of recording, such as using data loggers.</p> <p>Please forward your proposed process in writing to the Food Authority for consideration at contact@foodauthority.nsw.gov.au.</p>
<p>What are the requirements for cooling cooked meat and vegetables?</p>	<p>The requirements for cooling cooked potentially hazardous foods does not differentiate between food types. Food businesses must cool the food from 60°C to 21°C within 2 hours and from 21°C to 5°C within a further 4 hours.</p> <p>Similar products cooked in the same tray can be treated as a single batch for monitoring and recording the cooking and cooling temperatures e.g. a tray of vegetables containing carrots, peas and pumpkin of the same size and density can be treated as a single batch.</p> <p>Different protein types such as chicken, roast beef and fish should be monitored separately.</p> <p>For further information, refer to the Food Authority's Cooling potentially hazardous food fact sheet.</p>



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Is the Food Authority doing anything regarding verification or validation on requirements for using <i>eWater</i> as a cleaning product?	<p>The Food Authority does not approve cleaning products. Food businesses must ensure they use cleaning products suitable for use in the food environment.</p> <p>Look at product labels, product information sheets and have a discussion with your supplier.</p>
If a manufacturer of a high-risk product (e.g. ready-to-eat salads) provides shelf life validation results for 10 days, is this acceptable validation for a vulnerable persons business?	It would depend on the type of testing that was conducted as a part of the shelf life validation by the manufacturer. The Food Authority is happy to review any alternative validation that food businesses may have to assist the Vulnerable Persons industry.
What can we do if a catering service is not complying with food safety regulations?	If you have concerns with a third-party supplier, talk to your supplier about the requirements they must meet when supplying food to you. If this does not resolve your concern, contact the Food Authority to discuss your concerns on 1300 552 406 or at contact@foodauthority.nsw.gov.au .
What validation is required from suppliers when they provide ready-to-eat meats?	<p>All potentially hazardous foods should be received through a supplier who has been approved by your business.</p> <p>Types of approval may include licensed with the Food Authority, or HACCP accredited, or approved through a NSW state government services contract or issued with a food business notification number.</p> <p>To validate this approval, request evidence from your supplier of their appropriate approval (e.g. copy of Food Authority licence).</p> <p>Ensure potentially hazardous foods are received under temperature control:</p> <ul style="list-style-type: none"> ● cold food ≤ 5°C, or ● hot food ≥ 60°C, or ● frozen food to be hard frozen.

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	<p>Foods not received within these temperatures must have corrective action applied. The temperature of a representative food from each delivery must be monitored and recorded.</p> <p>Requirements for receiving food including appropriate validation procedures are outlined on page 8 of the Guidelines for food service to vulnerable persons.</p>
<p>For delivered frozen meals, is it safe for clients to heat their meal, eat half, put the remainder in the fridge then reheat it later in the day or the next day?</p>	<p>This practice is not recommended as a safe option by the Food Authority.</p>
<p>Safe egg handling</p>	
<p>Where is <i>Salmonella</i> found on an egg, outside or inside?</p>	<p>The strains of <i>Salmonella</i> that occur in Australia can be found on the outside of an egg and can penetrate the egg shell if there is a crack, even very fine cracks not visible to the naked eye.</p> <p>Condensation on eggs (egg sweating) can also facilitate movement of microbes inside the shell. Once the <i>Salmonella</i> is inside the egg, it can make its way through to the egg yolk and multiply.</p> <p>To manage this risk, do not use cracked and dirty eggs, serve eggs that are cooked until the white is firm and yolk begins to thicken and only use pasteurised egg in dishes which will not be cooked.</p> <p>Note: A different strain of <i>Salmonella</i>, <i>Salmonella</i> Enteritidis, occurs overseas and this is found inside the egg.</p>
<p>How long can a raw egg that has been cracked for the purposes of further cooking be stored in the fridge before being cooked as a poached egg?</p>	<p>The Food Authority recommends that eggs should only be cracked immediately before use.</p>

Question	Answer
<p>We are using a test egg when boiling eggs. Is there a validation process that could be used to remove the need to do test eggs?</p> <p>Could we validate at certain intervals, e.g. monthly, which will show eggs are being cooked as per procedure and a test egg is no longer required?</p> <p>Can temperature of cooked eggs be validated via periodic temperature monitoring and a validated procedure rather than checking eggs every time they are cooked?</p>	<p>Using a validated process for boiled eggs is acceptable provided the process is initially validated, there is routine monitoring of temperatures (e.g. once a month) and there is a procedure in place to ensure consistency of the process (e.g. volume of water, number of eggs, length of boiling time etc).</p>
Auditing and licensing vulnerable persons businesses	
<p>Can high performing vulnerable persons food businesses move to a bi-yearly audit program?</p>	<p>Audit frequency is linked to audit performance, i.e. the rating at last audit and the priority risk classification assigned to the food business. The Audits in the food industry factsheet outlines the Food Authority's audit frequency criteria.</p>
<p>How do we raise auditor inconsistency with the Food Authority?</p>	<p>If you experience auditor inconsistency, contact the Food Authority on 1300 552 406 or contact@foodauthority.nsw.gov.au to raise your concerns.</p>
<p>How does the Food Authority ensure auditor consistency at a national level especially on the process of validation to comply with Standard 3.2.1, as some auditors do not understand validation processes?</p>	<p>All regulatory auditors in NSW are required to meet minimum qualifications in food science, microbiology and auditing. In addition, the Food Authority regularly undertakes training workshops for all regulatory auditors to ensure auditor consistency across NSW.</p>

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	<p>If you disagree with a Corrective Action Request issued at audit, you can appeal to the Food Authority and we will review the matter.</p> <p>The Food Authority does not manage auditor consistency for interstate jurisdictions.</p>
<p>How do we obtain a history of Corrective Action Requests issued to my food business over the past 6-12 months?</p>	<p>Immediately after each audit, the Food Authority will issue a copy of your audit report that details any Corrective Action Requests that may have been issued. If you are missing an audit report, contact the Food Authority on 1300 552 406 or contact@foodauthority.nsw.gov.au to request a copy.</p>
<p>Are meal delivery organisations that deliver to vulnerable persons and leave meals on door steps subject to the same auditing requirements as other vulnerable persons businesses?</p>	<p>There are two licence types for businesses that deliver meals to vulnerable persons. <i>Delivered Meals Organisation (DMO)</i> will prepare, cook, package and deliver food direct to their customer.</p> <p><i>Food for DMO</i> is a centralised kitchen that will prepare meals for distribution to a Meals on Wheels delivery service.</p> <p>Both these licence permissions are regulated and audited under the Vulnerable Persons Food Safety Scheme and are required to have a food safety program.</p>
<p>If we introduce new food service operations into our food safety program, does the Food Authority need to review these amendments to make sure we are following the right standards?</p>	<p>The Food Authority does not need to review amendments to food safety programs in between audits, the auditor will ask you at your next audit whether you have made any updates to your program.</p>
<p>Why did licence audits move to bi-annually?</p>	<p>To ensure new licensees can demonstrate long term compliance with legislative requirements, they are subject to an increased audit frequency before moving to routine audits.</p>

Question	Answer
	This is a management tool to drive performance and there is now over 95% compliance across the state for licensed businesses. Information about the Food Authority licensing audit program can be found in our Audits in the food industry fact sheet.
After submitting a new licence application, when does the Food Authority complete the first licensing audit from the time of submitting the application?	The Food Authority will assess your application and write to you within 10 working days to let you know if we need any more information. In that letter we will also let you know a timeframe for any audit or inspection that is needed. We aim to finalise your application within four weeks after the audit or inspection. Information about the licensing application process can be found on our Licensing and notifying webpage.
Are there new licensing requirements for Meals on Wheels and Central Production Units businesses?	There are currently no new licensing requirements under the Vulnerable Persons Food Safety Scheme.
Food labelling laws	
Why is there no 'packed on' date label on packaged meat products?	The Food Standards Code does not require a 'packed on' date label. Information about food labelling laws can be found on our Labels & the Law webpage.

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<p>What is the difference between 'Use by' and 'Best before' dates?</p>	<p>A 'use by' date is the date after which the intact, unopened package of food, if stored under the conditions specified on the label, should not be consumed because of health and safety reasons. It is illegal to sell food which has passed its use by date.</p> <p>Foods marked 'best before' are safe to consume provided the food is otherwise fit for human consumption. Foods may experience some quality defects after the 'best before' date. Foods marked best before can be sold after that date, provided the food is not deteriorated or perished.</p> <p>Information about date labelling can be found on our Date marks & storage webpage.</p>
<p>Why is there a difference between states in food labelling and food handling?</p>	<p>All food businesses across Australia must comply with the relevant standards of the Australia New Zealand Food Standards Code.</p> <p>In NSW, the Food Authority has developed Guidelines for food service to vulnerable persons to assist businesses to comply with these standards.</p> <p>Compliance with the suggested control measures in the guidelines is not mandatory.</p> <p>Businesses can choose alternative compliance methods but must demonstrate an appropriately validated equivalent food safety outcome.</p>
<p>Future forums and third-party auditor workshops</p>	
<p>Will the Food Authority run future workshops for Central Production Units, like the third party auditor workshops?</p>	<p>The Food Authority is considering a variety of options for future workshops.</p>
<p>Can vulnerable persons food businesses attend third party auditor workshops?</p>	<p>At this stage, third party auditor workshops are for third party auditors only.</p>

Question	Answer
Should attendance at third party auditor workshops be mandatory?	The Food Authority will be offering a Livestream option for third party auditor workshops in 2018, which will likely increase attendance rates.
Out of scope businesses	
Why are food retailers located within a vulnerable persons facility serving foods to our clientele and are not audited by the Food Authority?	<p>The core business model for these businesses is not food service to vulnerable persons and they are not regulated under the Vulnerable Persons Food Safety Scheme.</p> <p>The Food Authority licensing system is about identifying and managing high risk businesses, and these businesses do not fall into this category.</p> <p>The Food Authority works with local councils to ensure food sold is safe and correctly labelled. Retail food outlets are regulated and inspected by the local council for the area.</p>
Why do other food delivery companies not have to follow the Vulnerable Persons Food Safety Scheme when delivering to the aged and disabled?	<p>It depends on the nature of the meal delivery business; do they solely make and deliver meals to vulnerable persons or do they make meals for the general population and these meals potentially could be ordered by vulnerable clients?</p> <p>Meal delivery organisations that cater for the general population fall outside the scope of the Vulnerable Persons Food Safety Scheme.</p>

Question	Answer
Other questions	
Does the Food Authority regulate dieticians?	<p>The Food Authority does not regulate dieticians. We understand they play an integral part in menu design, making sure the food menus available to patients are nutritionally suitable and meet the requirements of each patient's individual situation.</p> <p>The responsibility is on the facility to make sure the foods they recommend are safe.</p>
Will HACCP be updated to something like ISO22000?	<p>There is no requirement under Standard 3.2.1 Food Safety Programs for facilities to have food safety programs that comply with Codex Alimentarius, HACCP or ISO22000.</p> <p>There are no plans to incorporate these external standards into the national requirements.</p>
What might be some of the contributing factors to the high rates of <i>Salmonella</i> in Australia?	<p>High risk foods such as lettuce and bean sprouts and poor handling practices regarding raw egg products at the retail level have contributed to <i>Salmonella</i> outbreaks. Knowledge gaps in appropriate cleaning and sanitising procedures and production techniques have also been factors.</p> <p>The Food Authority has focused resources to the retail sector including introducing a safe egg handling training module as part of the Food Safety Supervisors training program and Food Safety Guidelines for the preparation of raw egg products, which has led to a measurable drop in <i>Salmonella</i> Typhimurium.</p> <p>In 2016, Food Authority Officers worked with raw produce manufacturers to look at their handling prior to distribution to ensure they had safe process controls in place.</p> <p>At a national level, food regulation Ministers have asked a group of senior officials to develop a strategy for reducing foodborne illness with a focus on reducing salmonellosis and campylobacteriosis.</p>