Food Act Report

Year ending 30 June 2015

Government of South Australia

SA Health

Contents

1. SOUTH AUSTRALIAN FOOD LEGISLATION

The Food Act 2001

The objectives of the *Food Act 2001* are defined in Section 3 of the Act as:

- Ensuring that food for sale is safe and suitable for human consumption.
- Preventing misleading conduct in connection with the sale of food.
- Providing for the application of the Food Standards Code.

The *Food Act 2001* closely follows the content and structure of national model food provisions, which provide for the consistent administration and enforcement of food legislation in Australia. This uniform approach to national food legislation was formalised by the Inter-Governmental Food Regulation Agreement 2002. Under the Agreement all states and territories have adopted the Australia New Zealand Food Standards Code (the Food Standards Code, 'the Code') through their Food Acts. While the Act contains important legal and administrative issues, such as defining offences and penalties, the Code details the specific requirements with which food businesses must comply.

The Food Standards Code ('the Code')

The Code is a bi-national document that details labelling, composition and food safety laws that apply to foods and food handling business. It is set out in four chapters:

- **Chapter 1 — General Food Standards:** General labelling and composition standards applying to all foods.
- **Chapter 2 — Food Product Standards:** Standards applying to specific foods or categories of foods.
- **Chapter 3 — Food Safety Standards (Australia only):** The Food Safety Standards include specific requirements for food businesses and food handlers that, if complied with, will ensure food does not become unsafe or unsuitable.
- **Chapter 4 — Primary Production Standards (Australia only):** Primary Production and Processing Standards for seafood, meat, dairy, eggs, sprouts and wine.

Primary Industries Legislation

The Primary Produce (Food Safety Schemes) Act 2004 is administered by Biosecurity SA (a branch of Primary Industries and Regions South Australia (PIRSA)) and the Dairy Authority of SA (DASA). The Act implements food safety requirements in the meat, dairy, seafood, sprouts, egg and citrus industries. This Act and the Food Safety Scheme regulations under this Act are recognised by (regulation under) the Food Act as they implement equivalent food safety requirements to those required by the Food Act.

South Australian food legislation forms part of a bi-national food regulatory system which is described on the following page.

2. THE BI-NATIONAL FOOD REGULATION SYSTEM

The food regulatory system is established by the Inter-Governmental Food Regulation Agreement 2002 between the State, Territory and Australian Governments. New Zealand's role and participation in the system is established by the Australia New Zealand Joint Food Standards Agreement between Australia and New Zealand, creating a joint food standards system.

The system consists of three major components:

1. Policy development by the Australia and New Zealand Legislative and Governance Forum on Food Regulation (the Forum), based on advice of the Food Regulation Standing Committee (FRSC).
2. Standards Development by Food Standards Australia New Zealand (FSANZ).
3. Administration of food legislation.

The 'Overarching Strategic Statement for the Food Regulatory System' which provides the strategic context for the bi-national food regulation system was endorsed by the Forum in 2008. The document articulates the scope and objectives of the system, the approach that will be taken to policy development, standard setting and implementation. The statement is available from the Food Regulation Secretariat website www.foodsecretariat.health.gov.au

Policy Development

The Australia New Zealand Ministerial Forum on Food Regulation (the Forum)

The Forum is primarily responsible for the development of domestic food regulatory policy and the development of policy for setting of food standards. It has the capacity to adopt, amend or reject standards recommended by FSANZ and to request that these be reviewed.

The Forum comprises Health Ministers from most Australian states and territories and the Australian Government as well as other Ministers from related portfolios (Primary Industries, Consumer Affairs etc.) where these have been nominated by their jurisdictions. Currently all jurisdictions, except New South Wales (NSW) and New Zealand, have nominated a Health Minister as Lead Minister for voting purposes. NSW has nominated the Minister for Primary Industries and New Zealand has nominated the Minister for Food Safety as Lead Minister. Under the Food Regulation Agreement the Australian Government Health Minister chairs the Forum. South Australia is represented by the Minister for Health and Minister for Agriculture, Food and Fisheries. The Minister for Health is the Lead Minister.

Communiques of Forum meetings can be found on the Food Regulation Secretariat website http://www.health.gov.au/internet/main/publishing.nsf/Content/foodsecretariat-communiques.htm

Some of the key initiatives of the Forum during 2014-2015 include:

- ***Forum Response to 'Labelling Logic', the Final Report from the Review of Food Labelling Law and Policy (December 2011)***: Implementation of this response continued to be a focus in 2014-2015. A progress report was updated in December, 2014, and can be found at http://www.foodlabellingreview.gov.au/internet/foodlabelling/publishing.nsf/Content/Progress_report_December_2014

- ***Health Star Rating System (front of pack labelling):*** In June, 2014 Ministers formally released the finalised Health Star Rating System (HSR). The system provides an interpretive Star Rating (maximum five stars) that can be presented on the front of packaged foods to assist consumers to make healthier food choices. Along with the option of including nutrient information icons for energy, saturated fat, sodium, sugars and one positive nutrient such as calcium or fibre. The implementation of this voluntary labelling system is being supported and monitored by the Health Star Rating Advisory Committee for a period of five years, with a formal review in June 2016 to assess industry implementation. The Director of Public Health Services, SA Health, is Chair of this advisory committee. Work on the effective uptake and implementation of this system, as well as consideration of anomalies, will continue.
  In January 2015, the Forum agreed to amend Standard 1.2.7 – Nutrition, Health and Related Claims – of the Code to exempt the relevant components of the HSR system that would have otherwise been made exempt by an endorsing body.
  During the reporting period, a number of stakeholder workshops have been rolled out across the country on the use of the system and an information campaign was launched in December 2014. More information can be found at www.healthstarrating.gov.au).

- ***Raw Bath Milk:*** The Forum considered the issue of consumption of unpasteurized (raw) cow's milk that is sold as bath milk. The Forum noted current action being taken by jurisdictions and agreed that a national approach is required to prevent consumption of this product, which can result in illness and even death. A working group has been formed to look at urgent measures to protect public health.

- ***Low THC*** **(delta 9-tetrahydrocannabinol)** ***Hemp:*** The Forum considered the review undertaken by FSANZ on an application to permit low THC hemp as a food. At their meeting in January 2015, the Forum rejected the application based on concerns around law enforcement, roadside testing and marketing. It was agreed that further work would be undertaken to consider these issues in more detail in consultation with relevant Ministers during 2015.

The Food Regulation Standing Committee (FRSC)

FRSC is responsible for coordinating policy advice to the Forum and ensuring a nationally consistent approach to the implementation and enforcement of food standards. It also advises the Forum on the initiation, review and development of FRSC activities.

Membership of FRSC reflects the membership of the Forum and comprises the heads of departments for which the Ministers represented on the Forum have portfolio responsibility, as well as the President of the Australian Local Government Association and FSANZ as observers. The Director of Public Health Services represents the department at FRSC.

FRSC Working Groups

The department participated in the following FRSC working groups during 2014-2015.

FRSC Working Group: Strategic Planning (SPWG)

This working group has responsibility for advising FRSC on annual priorities, documenting an annual work plan and liaising with the Implementation Sub Committee for Food Regulation (ISFR). In 2014-2015, the SPWG updated the FRSC Strategic Plan 2012-2017 and also developed new Terms of Reference for the working group.

In 2014-2015, the SPWG continued work to assist with the development of the Review of Strategic Directions for FRSC. This review identified the need to reshape the focus of the food regulation system to ensure that it is equipped to deal with future challenges. The FRSC Strategic Plan 2012–2017 defines the key outcomes to be delivered and the work programs that will be undertaken. These include food safety management and implementing the Forum Response to Labelling Logic, the final report of the Review of Food Labelling Law and Policy.

The plan is available on the Food Regulation Secretariat website
www.health.gov.au/internet/main/publishing.nsf/Content/foodsecretariat-strategic-plan.htm

FRSC/ ISFR Working Group: Monitoring and Enforcement Strategy for Food Labelling

This working group is tasked with developing a bi-national, risk based, consistent framework for monitoring and enforcement of food labelling, consistent with the recommendations of the Review of Food Labelling Law and Policy. The working group has considered existing and best practice policy and regulatory approaches to monitoring and enforcement of food labelling and in addition, existing coordination efforts between regulators to achieve a consistent approach to compliance and enforcement. Consultation with key stakeholder peak bodies was held in May 2015 on the findings and conclusions of the working group along with the draft Food Labelling Compliance and Enforcement Framework. A final report on this work is awaiting agreement from ISFR and FRSC. The working group held five face to face meetings during the reporting period.

Standards Development

SA Health's Advice to FSANZ regarding Proposed Amendments to the Australia New Zealand Food Standards Code

SA Health Food Safety and Nutrition Branch provided comment to FSANZ on the development of Food Standards. A total of 21 applications and proposals were finalised during the 2014-2015 financial year, resulting in amendments to the Code, as set out below.

Table 1. Finalised applications and proposals (1 July 2014-30 June 2015)

Application or Proposal	Brief Description	Outcome
A1039 – Low THC Hemp as a Food	To approve the use of *Cannabis sativa* with low levels of tetrahydrocannabinol, in both seed and seed oil, as a food.	Review requested by Forum 14/12/2012. Approved draft variation rejected by Forum 12/2/2015.
A1088 – Sodium Hydrosulphite as a Food Additive	To include sodium hydrosulphite (sodium dithionite) as a food additive to be used in the processing of canned abalone.	No review requested by Forum. Gazetted 4/12/2014 (Amendment 151).

Application or Proposal	Brief Description	Outcome
A1090 – Voluntary Addition of Vitamin D to Breakfast Cereal	To permit the voluntary addition of vitamin D to breakfast cereal.	Notified to the Forum 1/6/2015. Response due 31/7/2015
A1091 – Enzyme Nomenclature Change – Carboxyl Proteinase to Aspergillopepsin I & II	To seek amendments to the processing aid Standard to update the current entry for the enzyme carboxyl proteinase.	No review requested by Forum. Gazetted 4/12/2014 (Amendment 151).
A1092 – Irradiation of Specific Fruits & Vegetables	To seek permission to irradiate 12 specific fruits and vegetables (apple, apricot, cherry, nectarine, peach, plum, honeydew, rock melon, strawberry, table grape, zucchini and scallopini (squash) for phytosanitary purposes.	No review requested by Forum. Gazetted 26/2/2015 (Amendment 153).
A1094 – Food derived from Herbicide-tolerant Cotton Line DAS-81910-7	To seek permission for food derived from herbicide-tolerant cotton genetically modified to provide resistance to 2,4-D and glufosinate-ammonium.	No review requested by Forum. Gazetted 30/10/2014 (Amendment 150).
A1096 – Xylanase from B*acillus licheniformis as a Processing Aid* (Enzyme)	To approve a genetically modified strain of *Bacillus licheniformis* as a source for the enzyme xylanase for use in the bread-making industry.	No review requested by Forum. Gazetted 26/2/2015 (Amendment 153).
A1097 – Food derived from Herbicide-tolerant & Insect-protected Corn Line MON87411	To seek approval for food derived from a genetically modified glyphosate-tolerant and corn rootworm-protected corn line.	Notified to the Forum 26/5/2015. Response due 27/7/2015.
A1098 – Serine Protease (Chymotrypsin) as a Processing Aid (Enzyme)	To seek approval of a new enzyme, serine protease (chymotrypsin), sourced from a genetically modified strain of *Bacillus licheniformis* as a processing aid in the production of protein hydrolysates.	Notified to the Forum 26/5/2015. Response due 27/7/2015.
A1099 – Serine Protease (Trypsin) as a Processing Aid (Enzyme)	To seek approval of a new enzyme, serine protease (trypsin), sourced from a genetically modified strain of *Fusarium venenatum* as a processing aid in the production of protein hydrolysates.	Notified to the Forum 26/5/2015. Response due 27/7/2015.
A1101 – Commencement of Dietary Fibre Claim Provisions	To delay the commencement of provisions in Standard 1.2.7- Nutrition, Health and Related Claims for nutrition content claims about dietary fibre from 18 January 2016 for 12 months i.e. 18 January 2017.	Notified to the Forum 26/6/2015. Response due 25/8/2015.

Application or Proposal	Brief Description	Outcome
A1103 – Citric & Lactic Acids as Food Additives in Beer & related Products	To permit the extension of use of citric and lactic acids as food additives in beer.	Notified to the Forum 26/6/2015. Response due 25/8/2015.
P1022 – Primary Production & Processing Requirements for Raw Milk Products	To consider further permissions for the production and sale of raw milk products.	No review requested by Forum. Gazetted 26/2/2015 (Amendment 153).
P1025 – Code Revision	To revise the *Australia New Zealand Food Standards Code* to improve legal efficacy and for related purposes.	No review requested by Forum. Gazetted 10/4/2015 (Amendment 154).
P1029 – Maximum Level for Tutin in Honey	To develop a permanent maximum level for Tutin in honey.	No review requested by Forum. Gazetted 15/1/2015 (Amendment 152).
P1033 – Code Maintenance XII	To make minor amendments including the correction of typographical errors, inconsistencies and formatting issues and updating of references.	No review requested by Forum. Gazetted 30/10/2014 (Amendment 150).
P1035 – Gluten Claims about Foods containing Alcohol	To permit nutrition content claims about gluten in relation to foods (including beverages) containing more than 1.15% alcohol by volume.	Notified to the Forum 26/6/2015. Response due 25/8/2015.
P1036 – Code Revision – Consequentials & Corrective Amendments	To update the P1025 – Code Revision version of the Code to account for variations to the existing Code made in A1092, A1096, P1022 and P1029 and to correct errors.	Notified to the Forum 26/6/2015. Response due 25/8/2015.
P235 – Review of Food-type Dietary Supplements	To review food-type dietary supplements.	Abandoned.
P274 – Review of Minimum Age Labelling of Foods for Infants	To review the minimum age labelling of foods for infants. Standard 2.9.2 requires a label on an infant food to include a statement indicating the minimum age, expressed in numbers, of the infants for whom the food is recommended.	Rejected.
M1010 – Maximum Residue Limits (2014)	To consider varying certain maximum residue limits for residues of agricultural or veterinary chemicals that may occur in food.	No review requested by Forum. Gazetted 30/4/2015 (Amendment 155).

More details on all applications and proposals can be found at the FSANZ website www.foodstandards.gov.au

Administration of Food Legislation

States and territories have enacted Food Acts based on model food provisions as agreed under the Food Regulation Agreement 2002. Also under the agreement, states and territories have adopted the Australia New Zealand Food Standards Code (the Code) through their Food Acts. The model for administration of Food Acts differs between jurisdictions with either state and territory governments taking sole responsibility or responsibility being shared between State Government and Local Government.

The Australian Government Department of Agriculture (DoA) is responsible for the control of imported food which must also comply with the Code.

States and territories have traditionally regulated food safety in the domestic meat, dairy and shellfish industries under Primary Industry Acts, administered by primary industry departments. In recent times there have been moves in some jurisdictions to integrate this legislation into single Primary Industry Acts or modified Food Acts, with corresponding changes in administration. DoA has responsibility for food safety regulation of the export meat, dairy and shellfish industries. Some jurisdictions, in some industries, share enforcement responsibilities between DoA and states/territories.

Implementation Subcommittee for Food Regulation (ISFR)

ISFR was set up as a sub-committee of the Food Regulation Standing Committee and is responsible for developing and overseeing a consistent approach across jurisdictions to the implementation and enforcement of food regulations and standards.

ISFR members are either heads of their agencies or operational experts at senior level with capacity to make and implement decisions about enforcement issues in their jurisdictions. The membership comprises up to two representatives from each state and territory and New Zealand; one representative from each of the Commonwealth Departments (Health, Agriculture, FSANZ) and one representative from the Australian Local Government Association. SA Health is represented by the Director of Food Safety and Nutrition Branch.

ISFR has a '*Strategy for consistent implementation and enforcement of food regulation in Australia'* endorsed by the Forum. The strategy is available at the Food Regulation Secretariat website www.foodsecretariat.health.gov.au

The strategy has been re-organised into three key work programs, Implementation, Monitoring/Surveillance and Evaluation, and National Response.

ISFR reports at each FRSC meeting on progress of its work.

SA Health contributes to the work of ISFR in a number of ways, including participation in working groups and in nationally co-ordinated surveys and incident responses.

ISFR Working Groups

In 2014-2015 the department participated in the following working groups.

ISFR Nutrition, Health and Related Claims Working Group:

This working group was set up by ISFR to provide guidance on the consistent implementation and enforcement of Standard 1.2.7., as well as providing a forum for industry consultation and feedback on material developed to assist industry comply with Standard

1.2.7. The working group completed its development work in March 2015. Development work for stage 3 identified long-term and ongoing activities which is the current task of the working group. The group held five face to face meetings during the reporting period.

ISFR Food Safety Management Working Group (FSMWG)

In 2011 the revised Ministerial *Policy Guideline on Food Safety Management for General Food Service and Closely Related Retail Sectors* (PG) was endorsed by the Legislative and Governance Forum on Food Regulation to provide guidance and to ensure any additional regulatory interventions that may apply to the retail/food service sector are justified and implemented effectively, efficiently and consistently. The PG establishes policy principles to guide the process for determining and implementing appropriate risk management tools (between Food Safety Standards 3.2.2 and 3.2.3 and Food Safety Programs) for specified retail / food service sectors.

In February 2013, ISFR approved the formation of the FSMWG to implement the revised PG. The working group has representation from all jurisdictions and local government and is responsible for completing the phases of work in the development of a food safety management framework as identified in the 'Strategy for Implementation of the Ministerial Policy Guideline on Food Safety Management for General Food Service and Closely Related Retail Sectors'. The group held two face to face meetings and four teleconferences during 2014-2015.

The revised policy guideline may be found at the Food Regulation Secretariat website at: http://www.health.gov.au/internet/main/publishing.nsf/Content/4DCF744789D1AF64CA257BF0001C9622/$File/FoodSafetyManagement%202011%20Policy%20Guideline%20Dec%2011.pdf

ISFR Food Medicine Interface Working Group

This working group developed a Food-Medicine Interface Guidance Tool that can be used to work out whether particular products are likely to be therapeutic goods or not. It is designed to take the user though the relevant definitions in the Therapeutic Goods Act. The protocol was implemented during 2014 and its effectiveness will be considered after it is triggered a number of times.

In February 2013, ISFR agreed to a change in direction in implementing a toolkit to aid consistency and interpretation of food regulatory issues for local government. It was agreed that rather than mandating generic national guideline documents, the working group would develop minimum agreed principles, models and frameworks to be used as the basis for developing consistent (not uniform) documents and a register of available resources for local government.

During the reporting period, the working group continued to develop a consistent reporting framework and establish common tools for local government. Of particular focus, was the development of high level principles for nationally consistent food premises inspection, based on work from SA and Victoria, which will be presented to ISFR for endorsement later in 2015. The working group also contributed to the Undeclared Allergen Investigation Protocol which was endorsed by ISFR in March 2015. Reporting on annual local government reporting parameters, developed by the working group, also occurred for the first time at ISFR in March 2015. The working group met by teleconference three times during the reporting period.

Implementation of ISFR guidelines and policies

In addition to participating in ISFR working groups, SA Health supports the work of ISFR by implementing guidelines and policies agreed by ISFR.

New documents in 2014- 2015 are:

Undeclared Allergen incident and investigation protocol (2015)
This protocol was published in March 2015, to provide procedures for investigating and reporting of complaints of undeclared food allergens, supplementary to standard food investigation protocols. It contains guidelines and checklists for retail/food service, manufacturing and food import businesses.

'Getting your claims right' – A guide to complying with the Nutrition, Health and Related Claims Standard of the Australia New Zealand Food Standards Code. (2014)
This guide was published in September 2014, and includes templates and checklists to help businesses demonstrate due diligence in complying with the requirements of the Standard. It is scheduled to be reviewed and updated in 2016.

Health claims and enforcement (2015)
This document was developed in April 2015, by ISFR, and describes the material that food regulators will use to assess compliance with the Nutrition, Health and Related Claims Standard (Standard 1.2.7) of the Australia New Zealand Food Standards Code, including a description of how the Australia New Zealand Food Regulation Enforcement Guideline will be applied to nutrition, health and related claims. This publication also provides an outline of all relevant publically available information that may be used by food industry in complying with Standard 1.2.7.

Existing documents which continue to be used are listed on the Food Regulation Secretariat website (www.foodsecretariat.health.gov.au) and include:

Implementation of the National Food Safety Audit Policy and Regulatory Guideline
ISFR endorsed this Guideline in 2009 which was developed to provide guidance to food regulators on the consistent implementation of the National Food Safety Audit Policy (the Policy).

SA Health has developed and maintains approval systems and auditor guidelines consistent with the requirements of the Policy and Regulatory Guideline.

Australia and New Zealand Enforcement Guideline (2009).
SA Health continues to use this Guideline as the basis for its risk based, graduated and proportionate approach to enforcement.

This document has also being used in the development of a SA state-wide enforcement policy with the aim of facilitating consistent enforcement across local councils in SA.

The national guideline is available from the Food Regulation Secretariat website.
http://www.health.gov.au/internet/main/publishing.nsf/Content/foodsecretariat-enforcement-guideline.htm

3. SOUTH AUSTRALIAN GOVERNMENT INITIATIVES

Food Safety Rating Scheme

In October, 2014 a state-wide, food safety rating scheme was released under pilot to 10 local government areas who volunteered to assist SA Health in testing the new scheme for 12 months.

The volunteering councils are:

- Adelaide City Council
- Adelaide Hills Council
- City of Salisbury
- City of Tea Tree Gully
- City of Holdfast Bay
- Mid Murray Council
- District Council of Mount Barker
- Rural City of Murray Bridge
- City of Onkaparinga
- Wattle Range Council

The scheme involves businesses being rated for their food safety compliance as part of their routine food safety inspection and this rating being displayed to the public, in the form of a certificate. The display of the certificate is voluntary by businesses.

The primary objective of the scheme is to provide information to the public on the results of inspections carried out by local government officers on medium/ high risk food service businesses (P1 and P2), such as cafes and restaurants. It is also anticipated that these businesses will improve food safety compliance.

The results of the pilot scheme will be released in late 2015 and will inform development of an ongoing voluntary scheme in South Australia. Full details of the scheme and supporting documents are available on the SA Health website. www.sahealth.sa.gov.au/foodsafetyratingscheme.

4. ADMINISTRATION OF THE FOOD ACT 2001 IN SOUTH AUSTRALIA

In South Australia, the *Food Act 2001* (the Act) and the Australia New Zealand Food Standards Code (the Code) are administered jointly by the Department for Health and Ageing and Local Government.

Responsibilities of the Department for Health and Ageing

The department is responsible for the following:

- Oversight of administration of the Act.
- Monitoring compliance with labelling, composition, microbiological and chemical requirements of the Code throughout SA.
- The safety and suitability of food sold, and monitoring and enforcement of compliance with Food Safety Standards in unincorporated areas of the state (85% of the geographical area of SA).
- Monitoring food safety related incidents and initiating appropriate responses
- Audit of Primary Production and Processing (PPP) operations captured by the Act and businesses captured under Food Safety Standard 3.3.1 Food Safety Programs for Food Services to Vulnerable Persons.
- Providing advice to local governments dealing with minor foodborne disease outbreaks in their areas and leading investigations and remediation of more significant outbreaks.
- The exercise of emergency powers to remove, prevent or reduce the possibility of a serious health risk including initiation and coordination of food recalls.
- Providing advice, support and assistance to local government.
- Providing advice to food businesses and the public on food issues.
- Advising the Minister on issues pertaining to the application of the Act and food issues generally.

Food Safety and Nutrition Branch (FSNB)

FSNB is responsible for the day-to-day administration of the Act, as described above (except for the role of the Health Protection Operations as described below). More specifically, the branch prepares advice to senior department staff and the Minister for Health on food issues, development of legislation and proposed amendments to the Code. The branch monitors compliance with the Code and the results of surveys undertaken for this purpose are published on SA Health's web site.

The branch conducts environmental investigations of major food poisoning outbreaks. This involves an immediate response to stop the supply of suspected food, the collection of food and environmental samples, analysis of food handling procedures to determine the cause of an outbreak and follow-up enforcement actions.

The branch also participates in the development of state and national food regulatory policy and contributes to national programs which facilitate a consistent approach across jurisdictions to the implementation and enforcement of food regulations and standards. The branch also provides advice on significant issues and assistance to the food industry in the implementation of significant new legislation.

Communicable Diseases Control Branch

Under the *South Australian Public Health Act 2011* laboratories and medical officers are required to notify occurrences of foodborne disease to the department's Communicable Diseases Control Branch (CDCB). Monitoring and analysis of these reports by CDCB

provides an alert for foodborne disease outbreaks in the community. CDCB also conduct follow-up interviews with affected persons, including an assessment of foods eaten during the days prior to the onset of the illness to trace potential causes of a foodborne disease outbreak. The application of statistical tools can assist in identifying the likely food or business responsible for the outbreak.

Health Protection Branch

Environmental Health Officers (EHOs) from Health Protection Operations administer the Act in the 'Out-of-Council Areas' within South Australia ('unincorporated' and Aboriginal Lands; not serviced by a local council). These areas are typically very remote and account for approximately 85% of the state. Health Protection Operations is responsible for the following functions:

- Monitoring and enforcement of compliance with Food Safety Standards and of the safety and suitability of food.
- Routine and follow up inspections of food businesses to ensure that the premises, equipment and standard of food handling will result in the supply of safe and suitable food.
- Food safety audits of businesses providing food to vulnerable populations.
- Responding to complaints about food businesses and investigating food poisoning and disease outbreaks.
- Monitoring and taking action as appropriate to ensure efficiency with which food is recalled for health and safety reasons, and/or is removed from sale.
- Receiving food business notifications for new businesses or change to business details.
- Provision of food safety advice and delivery of educational programs and resources to food businesses, schools and communities.

All Health Protection Operations staff authorised under the Act are qualified EHOs with extensive regulatory experience in rural, remote and Aboriginal communities. The vast distances and extreme weather conditions associated with outback South Australia provide a challenging environment for both food business operators and regulators alike. In the majority of cases however, the risks associated with the environment and logistics of such locations are well managed and compliance is maintained.

Statistics about food businesses, staff and surveillance activities are provided below.

Table 1. Authorised Officer Details

Authorised Officers	Environmental Health Qualifications	Full-Time
	4	4

Table 2. Food Businesses Surveillance Activity

Food Businesses and Surveillance Activity	**Number**
Businesses	130
Routine Inspections	117
Follow-up Inspections	4
Food Safety Audits	7
Complaint Inspections	2

Table 3. Enforcement Actions

Enforcement Actions			
Business Type	Warnings	Improvement Notices	Expiations
Hotel/Pub/Tavern	2	1	0
Roadhouse/service station		1	1
Restaurant	1	0	0
Total	**3**	**2**	**1**

Roles and Responsibilities of Local Government

Food regulation in South Australia is a partnership between state and local government. The Memorandum of Understanding (MOU) between the Minister for Health and the Local Government Association of SA (LGA) for the exercise of functions under the Act establishes the roles and responsibilities of the department and local councils.

Local government is responsible for the following functions within its jurisdiction:

- Safety and suitability of food sold, and monitoring and enforcement of compliance with Chapter 3 of the Australia New Zealand Food Standards Code, including undertaking appropriate food premises inspections.
- Managing minor foodborne disease outbreaks within council boundaries and assisting the department with investigations into any significant foodborne disease outbreaks within SA.
- Monitoring and taking action as appropriate to ensure efficiency with which food is recalled for health and safety reasons, and/or is removed from sale.
- Receiving notifications from food businesses.

EHOs representing local councils are the front line for food safety in South Australia. EHOs routinely inspect food businesses to ensure that the premises, equipment and the standard of food handling will result in the supply of safe and suitable food. A key part of their role is the provision of advice and educational materials to food businesses. They also respond to complaints about food businesses and investigate food poisoning outbreaks independently, or with the assistance from officers of the department.

Effective Administration

SA Health – LGA Work Plan 2014-2016

The MOU between the Minister and the LGA includes an agreement to establish a joint work plan to continuously improve food safety and the effectiveness of the Act. A working group with representatives from the Food Safety and Nutrition Branch, LGA, local government and Environmental Health Australia (EHA) released a revised joint work plan in April, 2014. SA Health continues to lead and support the working group overseeing this work plan as well as the detailed work being undertaken within each of the work plan projects.

During 2014-2015 work progressed on the following six projects contained within the current work plan.

Risk Classification and Inspection Frequency (SA Food Business Risk Classification System)

Under Project 1 of the work plan, a state wide system for food business risk classification and inspection frequency has been developed based on the National Food Safety Risk Profiling Framework. This system was piloted in 2012-13 and implemented in 2013-14 with a two year transition period for local government to risk classify food businesses. In 2014-2015 EHOs commenced risk assessing food businesses against the new classifications during routine inspections.

This risk classification system is science based, reflecting risks inherent to the food associated with ingredients or processes applied and the potential for control of these risks by the food business. It also sets a frequency range for inspections for each risk classification with business performance determining the frequency of inspection in the range assigned by that risk.

Two training sessions were held in 2014-2015 as part of our ongoing commitment to ensure consistent implementation of the system. The focus of the training is to support EHOs to identify and classify inherent food risks within food business and ensure that the food processing and handling of higher risk products is adequate to produce safe food.

The South Australian Food Business Risk Classification can be found at: http://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/protecting+public+health/food+standards/priority+classification+of+food+businesses/priority+classification+of+food+businesses

Food Act Toolkit

SA Health achieved significant progress under this project in 2014-2015 developing a comprehensive resource that assists the consistent interpretation, monitoring and enforcement of the Act. Results from a comprehensive consultation period were released in the Enforcement Project Report and based on these findings, SA Health have prepared an Enforcement Framework to provide guidance on the use of the various enforcement tools available to authorised officers. Further guidance and supporting materials will be made available in 2015-2016.

Food Safety Rating Scheme (FSRS)

An update on the FSRS project has been provided in section 3.

National Food Regulation Reform

This project identifies any local government related work being undertaken at the national level. The work of the ISFR Local Government and Food Safety Management Working Groups were identified as relevant during the reporting period and regular updates were presented to the working group from SA Health members who represent SA on these ISFR working groups. Updates on these committees are outlined in section 2.

Review of Notification

In 2014-2015, SA Health, working closely with the LGA, developed a range of options to address the local government concerns surrounding food business notifications. The SA Food Regulations are being formally reviewed late in 2015 and therefore the Minister for Health has directed that the concerns regarding this process should, where possible, be addressed under this review.

Audit and Inspection Fees

The main objective of this project is to ensure audit and inspection fees charged by government are set at an appropriate level. As of 1 July, 2014, all fees were linked to the Consumer Price Index. Further work to review the maximum available charge for food inspections by local government, is being led by the LGA and is still progressing.

Food Special Interest Group of the SA Division of Environmental Health Australia (Food SIG)

Environmental Health Australia (EHA) conducts bimonthly Food Special Interest Group (Food SIG) meetings for the purpose of providing professional development to EHOs relating to food safety and food legislation. SA Health has continued to maintain an association with the Food SIG and attended six meetings in 2014-2015.

The group consists of EHOs as members of EHA together with invited representatives from SA Health. The goal of the group is to draw on the depth of knowledge and to promote new ideas and thinking in relation to food safety monitoring, enforcement and assessment.

The Food SIG holds regular discussions on the interpretation of various components of the Food Safety Standards to encourage consistent monitoring and enforcement of legislation. Other major topics routinely discussed by the Food SIG during the reporting period include:

- Promoting effective communication and improved understanding of roles between Commonwealth, state and local regulators.
- Providing guidance or clarification to local government on the consistent interpretation of food standards in relation to practical field issues.
- Providing updates on consistent interpretation and enforcement of mandatory food safety programs and audit requirements of Standard 3.3.1.
- Providing food technology advice and information.
- Promoting effective communication with the national food industry.
- Development and support for smaller working parties to discuss concerns around technical matters.
- Food bulletin and survey discussions.

Establishing Roles and Responsibilities with Biosecurity SA (a Branch of PIRSA)

To maintain food safety through all stages from primary production to the consumer, the responsibilities and cooperative arrangements between SA Health, Biosecurity SA and Local Government are defined through the following:

1. MOU between SA Health and Biosecurity SA for Surveillance, Incident Response and Regulation of Food Safety in the Primary Industry Sector in South Australia.

2. MOU between the Minister for Agriculture Food and Fisheries, Minister for Health and Local Government Association of SA: ‘Regarding Management of Food Safety at Accredited Meat Processors in South Australia’.

5. ACTIVITIES OF THE FOOD SAFETY AND NUTRITION BRANCH

Monitoring Compliance with the Food Act 2001

The Food Safety and Nutrition Branch (FSNB) conducts sampling surveys of various foods that are of public health concern, or to confirm compliance with the compositional and labelling requirements of the Code. A key performance indicator has been established to analyse 800 food samples per year. For the Year 2014-2015, a total of 800 food samples were taken consisting of 521 routine survey samples, 179 samples as part of foodborne illness investigations and a further 100 in relation to surveillance of compliance with the Code.

The surveys completed by the Branch in 2014–15 include:

I. Microbiological Integrity of Chicken Meat

II. General labelling Compliance Survey

III. Microbiological Integrity of Soft Cheese

IV. Survival of Salmonella Typhimurium in Commercially Prepared Aioli

V. Survey of Allergen Free Claims

Past and current surveys listed above can be found on the SA Health web site at http://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/about+us/legislation/food+legislation/food+act+reports

Follow Up Snapshot Surveys

Egg Catering Pack Survey

The external shell of eggs may contain harmful bacteria such as *Salmonella* which can be found in the intestines of birds and other animals. Cracked and dirty eggs pose a higher food safety risk as they have a higher chance of carrying bacteria and in turn, significantly increase the risk of food poisoning.

SA Health recently completed a five year sampling plan of whole eggs available for retail sale that assessed the microbiological integrity. 99% of 4834 eggs assessed did not detect *Salmonella* species (reported in Food Act Report year ending 30 June 2014).

A snapshot follow-up survey was conducted this year. Whole eggs available for sale in tray packs from wholesale produce retail type businesses were sampled.

150 eggs from four different producers were collected. All eggs were visually examined for cleanliness and candled to identify any cracks. If any dirty eggs (where there was visible surface contamination) or cracked eggs were identified, these were analysed for the presence of *Salmonella* individually.

For other eggs that were acceptable (i.e. not dirty or cracked), a random sample of 10 eggs were selected from the tray. The external shell and contents for these samples were analysed separately for the presence of *Salmonella*. All samples were sent to the SA Pathology Food and Environmental Laboratory for *Salmonella* analysis.

18 dirty eggs (12%) and 2 cracked eggs (1%) were identified and analysed for the presence of *Salmonella*. The external shell and contents of 50 acceptable eggs were analysed for the presence of *Salmonella*. No *Salmonella* was detected on any of the samples analysed.

Kilojoule Labelling

As part of continuous monitoring of kilojoule labelling, Food Standard Surveillance Section of SA Health conducted random inspections of multisite food businesses across Adelaide CBD, surrounding metropolitan suburbs and country areas of South Australia in 2014-2015.

Compliance issues identified were addressed at store level and where required, with the franchiser head office. SA Health also monitored multisite food business who met the criteria to be captured under the kilojoule labelling legislation due to the opening of new stores in South Australia or nationally.

In 2014-2015, a new café chain had been captured by the legislation with the introduction of their twentieth store in South Australia. There is a provision in the legislation for 12 months extension for any new business to comply with kilojoule labelling requirements. The business was informed via official letter in advance and some of their stores were inspected after the extension period was over and found to be compliant.

SA Health continues to provide guidance and advice to any multisite food chain so that they can comply with the legislation with in the desired time frame. A total of 27 inspections were carried out in 2014-2015 and 23 (85.15%) stores were compliant with the legislations. Two main areas of concern were identified.

- Multisite cafe chains selling some of their products without kilojoule values displayed on them. The follow up visits to these stores confirmed that all noncompliant products were either labelled or removed from sale by the businesses.
- A new challenge in kilojoule labelling compliance has evolved with the introduction of new printing technologies especially the introduction of dynamic digital menus which are replacing old static display menu boards. SA Health is working closely with industry and other jurisdictions to address the new compliance issues arising due to the display of kilojoule content on these digital menus

South Australian Participation in National Food Surveys — the ISFR National Coordinated Survey Plan

The ISFR national coordinated survey plan consists of surveys which are selected to gather information on current national issues of food safety and compliance. The Food Surveillance Network consists of representatives from FSANZ, States and Territories.

Investigation of Food Safety Issues 2014-2015

Food safety related issues come to the attention of the Food Safety and Nutrition Branch (FSNB) from a variety of sources including routine food surveys, complaints from members of the public, reports from the food industry itself, EHOs in local government, other regulatory agencies, or notification of illness from the Communicable Disease Control Branch (CDCB). During the year 2014-2015, a number of significant issues were investigated and are summarised below.

SA Health coordinated or led a total of 6 foodborne illness investigations after notification from the CDCB. Of these SA Health investigated a total of 6 outbreaks as the lead

jurisdiction and coordinated a further 19 outbreaks and 8 clusters with the assistance of local council EHOs.

Details of some of the major outbreaks can be found on page 25 of this report.

Investigations included onsite assessment of food practices of the food business, sampling of food and environmental swabbing. The primary objective of these investigations is to remove any risk to public health, establish the cause of the outbreak, ensure food businesses implement short and long term corrective action and to determine if an offence has been committed against the Food Act.

As a result of several outbreaks SA Health conducted a number of investigation surveys of fresh vegetables and sushi which had been possibly implicated in these outbreaks.

Sushi

A total of 40 sushi samples were purchased from 11 sushi outlets where consumers had eaten food which was a possible sources of their *Salmonella* contamination. As part of the survey additional information on the source of the eggs, meat, chicken and rice used as fillings in the sushi was also collected to determine if any of the fillings were the source of the salmonella contamination. No *Salmonella* was detected on any of the samples analysed.

Brussel Sprouts

In a survey of loose and packed Brussel sprouts, 25 samples were collected from 21 individual retailers. The Brussel sprouts were tested for coliforms, *E. coli* and *Salmonella*. No *Salmonella* was detected and all other test results were within satisfactory limits.

Baby Spinach

A survey was conducted of baby spinach available for sale in retail outlets in the metropolitan area. 51 packaged baby spinach samples were sent to the SA Pathology Food and Environmental Laboratory to be analysed for the presence of *E. coli*. All samples tested <3 organisms per gram which is the lowest detectable level.

Food Recalls

Food recalls conducted by a state or territory agency are nationally coordinated by Food Standards Australia and New Zealand (FSANZ). The food business undertaking a recall is responsible for ensuring that the recall is carried out as soon as an issue is identified. Standard 3.2.2 requires a food business that engages in the wholesale supply, manufacture or importation of food, to have a system in place to ensure the recall of unsafe food. This usually includes advertisements in newspapers informing consumers of the recall. SA Health informs EHOs state wide of the recall and requests that they check food businesses in their local council area to ensure food businesses are complying with the recall.

FSANZ acted as coordinator for 68 food recalls during the 2014-2015 financial year. This consisted of 10 trade level recalls, where the company has only provided product to distribution centres, wholesalers and food services. As the product has not been released in retail stores and could easily be retrieved a consumer level recall was not required.

A further 58 recalls were consumer level recalls, where it was necessary to recover product from retail outlets and/or consumers. South Australian food businesses were responsible for one recall in this period. In total South Australia was affected by twenty 23 recalls where recalled product had been distributed in this state.

Table 1. Type, reason and the states involved in each of the recalls

Type of Recall		Reason for Recall		SA Not Affected	National	SA & Other States Affected	SA Only
Consumer	58	Microbiological	25	45	18	5	0
Trade	10	Labelling	25				
		Foreign Matter	16				
TOTAL	**68**	Chemical	2				

Food Safety and Nutrition Branch (FSNB) Enforcement Actions

Local Government is responsible for the conduct of routine food business inspections to verify compliance with chapter 3 of the Code. FSNB is responsible for food industry compliance with Chapters 1 & 2 of the Code and also becomes involved with compliance matters associated with Chapters 3 & 4 in the course of audits, surveys, complaints and investigation of illness.

Where FSNB identifies noncompliance issues in food businesses, corrective actions are addressed through a graduated and proportionate response. Where warning letters are issued or reduced frequency of audit applied; once effective corrective action is confirmed no further enforcement action is undertaken. Should non-compliance remain unresolved, enforcement action can be escalated.

Table 2. Enforcement Activities

Letters of Warning	Expiations Issued	Improvement Notices	Prosecutions
8	0	0	0

Complaints/ Enquiries Received

FSNB receives complaints and enquiries from a number of sources throughout the year.

Table 3. Nature of Compliant and Enquiries

Category	No of Enquiries	Percentage
Risk Classification Interpretation	45	1
Alleged Food Poisoning	62	4.5
Contamination	110	8
General Enquiries	348	25
Incidents	18	1
Labelling	183	13
CDCB Referrals	299	22
New Business Information	77	6
Food Recall	7	0.5
Food - Resources Required - General	163	12
Food - Standard 3.2.2	82	6
Food - Standard 3.2.3	19	1
Total	**1413**	

Allocation of Enquiries

Table 3 has been extracted from records to quantify the nature of communication received by Food Standards Surveillance (FSS). All enquiries are recorded, allocated an action officer and a time frame for completion.

Food Safety Management

Food Safety Programs (FSPs)

Food safety programs have been mandated nationally for businesses providing food to vulnerable populations in hospitals, aged care facilities, childcare centres, and via delivered meals organisations such as Meals on Wheels.

National Food Safety Standard 3.3.1 (audited mandatory food safety programs for food services to vulnerable persons) became enforceable in South Australia in October 2008. The department has continued to liaise with industry, local government and food safety auditors to develop monitoring and review systems, to ensure effective management of the audit process in SA food businesses to whom this standard applies.

In 2014–15 the department has continued to conduct food safety audits of public hospitals, Department for Communities and Social Inclusion (DCSI) businesses such as Disability Services and Domiciliary Care and not-for-profit delivered meals organisations including Meals on Wheels. These facilities are audited at the frequency determined by the performance of individual sites, in line with the priority classification for these businesses.

Table 4. Vulnerable Population Routine Audits

Risk Classification	No of Businesses	Routine Audits
Public hospitals	72	76
Not for profit delivered meals organisations	46	44
Aged care / childcare audited in regional areas/ DCSI	13	13

Food Safety Program Information Sessions

To continue to support the consistent interpretation and enforcement of Standard 3.3.1 the department has conducted information sessions and presentations for stakeholders on the progress and common outcomes of food safety program auditing. In particular:

- The Institute of Hospitality in Health Care Country Conference – Clare.
- Flinders University Nutrition & Dietetics Students
- Country Health Local Health Network

Auditor Training for Department for Health and Ageing and Local Government Officers

The annual SA Health auditor forum was held on the 7 November 2014 to assist with improving consistency of interpretation and professional development for the auditor workforce.

The department continues to facilitate the Lead Auditor in Food Safety Management Systems training sessions. One training session was held 29 September – 3 October 2014 for 15 participants.

Food Safety Presentations

Food Safety and Nutrition Branch provided food safety, food legislation and SA Food Business Risk Classification presentations to interested groups and organisations including;

- Environmental Health Australia Food Special Interest Group (SIG).
- Environmental Health Australia Public Health Manager's Forum.
- Flinders University nutrition students on food law in general, and the process involved in development of food standards.
- Adelaide University medical students incorporating an overview of food regulatory system, the causes and investigation of foodborne illness outbreaks and food safety tips.
- Catholic Safety Health & Welfare SA to educate volunteers on food safety for food being provided at charity events.
- Food SA meeting to present information on the new Health Star Rating System (HSRS) for food products.
- OzFoodNet – Face to Face Meeting - Adelaide
- Infant Nutrition Council and Australian Food & Grocery Council (AFGC) / The Australian Institute of Food Science Technology (AIFST) seminars on food labelling.
- The Yorke Peninsular Producers Workgroup, conducted by the Yorke Peninsular Regional Development Board, on food safety regulation.
- The South Australian Sub Branch of the World's Poultry Science Association (WPSA) poultry industry day to discuss Salmonella issues in the food sector.
- National Environmental Health Australia Conference delegates on egg processing.
- scosa, Spastic Centres of South Australia to educate volunteers on food safety.
- Hope Valley Bowling Club to educate volunteer food handlers on food safety.
- In collaboration with The University of Adelaide and Biosecurity SA, pilot workshops about Salmonella in the egg industry were conducted for regulators and egg producers. This provided information relating to research findings on Salmonella and an opportunity for a variety of regulatory sectors and industry to discuss topics relating to the management of Salmonella throughout the food chain.
- Northern Environmental Health Group – Kapunda

Food Safety Week

Food Safety Week is a national event organised by the Food Safety Information Council (FSIC), Australia's leading disseminator of consumer targeted food safety information.

The theme of this year's message was "Temperature Danger Zone". To help promote Food Safety Week in council areas, SA Health provided promotional material to assist councils who planned information booths, events in or provide lectures to interested community groups in their council areas. The promotional material included jute bags, sandwich containers, pizza cutters, krazy graters, egg shaped cruets, liquid hand sanitisers and silicone hot mats. These products all displayed a food safety message about temperature control of food, hand washing requirements and the correct storage of perishable foods.

The FSNB Food Safety Fundamentals DVD to promote safe food handling and preparation practices to the food industry and general public was also provided. A Food Safety video by Adam Liaw is available at the following web link:

http://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/health+topics/health+conditions+prevention+and+treatment/food+safety/keeping+your+food+safe/preventing+food+poisoning+at+home

Communication and Consultation

To facilitate communication and consultation with stakeholders, the department adopted a number of different mechanisms this year:

Food Regulation Inter-Departmental Committee

The SA Government Food Regulation Interdepartmental Committee (IDC) was established in October 2005 to facilitate improved communication and consultation between relevant government organisations regarding food regulation matters.

The South Australian government departments represented are:

- Department for Health and Ageing (Chair, secretariat).
- Department of Premier and Cabinet.
- Department of Primary Industries and Regions South Australia (PIRSA).
- Attorney General's Department.

The Terms of Reference are:

- Consider food regulation, policy and industry compliance issues.
- Actively share information that may be relevant or of interest to South Australian Government agencies in relation to food regulation and policy.
- Consider issues referred to it by Government or Ministers.
- Advise the Minister for Health and other relevant Ministers on food regulation and policy issues.
- Contribute to the formulation of a 'whole of SA government' position as required.

SA Meat Food Safety Advisory Committee

The department continues to participate as a member of the Committee under the Primary Produce (Food Safety Schemes) (Meat Food Safety Advisory Committee) Regulations 2005. The committee considers issues pertinent to management of the Primary Produce (Food Safety Schemes) (Meat Industry) Regulations 2006 under the Primary Produce (Food Safety Scheme) Act 2004.

The role of the Committee is to provide advice to the Minister for Agriculture, Food & Fisheries on matters relating to food safety in the primary production sector in South Australia. The Committee met once during 2014-2015.

This financial year The Department of Premier and Cabinet requested a review of the membership of the Advisory Committee to reduce its membership. A restructured Advisory Committee will reduce the membership from 17 to 12 members.

The Regulations stipulate specific representation from industry and regulatory organisations; however there have been changes to some industry structures that are referred to within the regulations. This can allow for amalgamation of some Committee representations. SA Health will continue to be represented on the Committee.

Other

FSNB provides briefings as required for South Australian members of:

- The Council of Australian Governments (COAG) working groups and sub- committees.
- COAG Health Council.
- The Australian Health Ministers Advisory Council (AHMAC) and principal committees.
- The National Health and Medical Research Council.

6. FOODBORNE DISEASE INVESTIGATIONS IN SOUTH AUSTRALIA, 2014-2015

Epidemiological investigations into foodborne and suspected foodborne disease outbreaks within South Australia (SA) are coordinated by the Disease Surveillance and Investigation Section (DSIS) and OzFoodNet staff who are based within the Communicable Disease Control Branch (CDCB) of SA Health. OzFoodNet is a national body that conducts enhanced foodborne disease surveillance.

OzFoodNet and other CDCB staff work in collaboration with a range of stakeholders when investigating outbreaks. SA Pathology conducts microbiological testing and molecular typing of isolates from humans and food and environmental samples. Local Government EHOs and the SA Health Food Safety and Nutrition Branch undertake environmental and food premises investigations. Biosecurity SA staff assist with trace back investigations and implement control measures with primary producers where appropriate.

OzFoodNet and other CDCB staff conduct interviews with cases to obtain a food history when a cluster of suspected foodborne disease is detected. This information is used to identify frequently consumed food items that can sometimes lead to further investigations. When further investigations are required, it is often in the form of analytical studies that aim to demonstrate a statistical association between illness and the consumption of a particular food item, eating at a particular premise, or an environmental exposure. When a food and/or premise are suspected on epidemiological grounds, laboratory evidence (e.g. microbiological testing of food and environmental samples) can support observed epidemiological associations.

The specific food vehicle or source of an outbreak is often difficult to identify. An implicated food item may no longer be available or suitable for microbiological testing, making it impossible to provide laboratory evidence for the source of an outbreak. Cases may also have difficulty in remembering foods consumed or premises visited if too much time has passed between the exposure and the initiation of the investigation.

During the period of 1 July 2014 through to 30 June 2015, SA Health investigated nineteen outbreaks of gastrointestinal illness that were known or suspected to be foodborne in which a common source was identified. Ten of these outbreaks were associated with restaurants, five outbreaks were associated with private residences, and one each was associated with a takeaway shop, bakery, school function and workplace function.

Eight clusters of illnesses were also investigated during this timeframe that were potentially foodborne but no common source could be identified. Seven of these clusters were caused by *Salmonella* and one by *Campylobacter*. Hypothesis generating interviews were conducted with the majority of cases.

Clusters or outbreaks that were suspected to be person-to-person or animal-to-person have not been included in this summary. All investigation data are subject to change, as this is the nature of clusters and outbreaks.

A summary of outbreaks investigated during July 2014 to June 2015 and their settings are presented in Table 1; clusters investigated are listed in Table 2.

Outbreak Investigations

An outbreak is defined as an event where two or more people experience a similar illness after eating a common meal or food and epidemiological evidence indicates the meal or food as the source of the illness.

Outbreak No. 1: *Salmonella* subsp 1 ser 4,5,12:i:- - Private residence

Four cases of *Salmonella* subsp 1 ser 4,5,12:i:- were reported in September 2014 and found to have attended an engagement party at a private residence. Approximately 100 people attended the party and 18 individuals were reported to be unwell with gastroenteritis following the event. The four confirmed cases all reported eating roast pig-on-a-spit, which was described to be under-cooked. All four cases had the same MLVA profile; 04-15-12-00-490.

Outbreak No. 2: *Salmonella* Typhimurium phage type 44 – Restaurant

Twelve cases of *Salmonella* Typhimurium phage type 44 were reported in September 2014 linked to a restaurant in metropolitan Adelaide. During interview, eleven cases reported eating different types of eggs (e.g. scrambled, poached, fried) as part of a breakfast meal at the same restaurant on one weekend in late August 2014. The final case was a chef at the restaurant who prepared the eggs on that weekend. The chef provided inconsistent information regarding his onset of illness therefore his role in the outbreak is unclear. An inspection of the restaurant was carried out and the restaurant was shut down until various improvements were made. Several food samples (including eggs) were collected from the restaurant and a sample of breadcrumbs used to coat meat and zucchini was positive for *Salmonella* Typhimurium phage type 44. All cases and the positive food sample from the restaurant were found to have the same MLVA profile; 03-10-08-09-523.

Outbreak No. 3: *Salmonella* Typhimurium phage type 9 – School

Five individuals were reported with *Salmonella* Typhimurium phage type 9 from a rural area of South Australia within a two week period in early September 2014. All cases were students or teachers in a home economics class at the local High School and had cooked and eaten a chicken burger prior to becoming ill with gastroenteritis. The burger ingredients were raw chicken mince and raw egg combined to make the burger patty, served with various salads, apple mayonnaise (made using commercial mayonnaise) and a hamburger bun. MLVA results showed a highly similar pattern (03-24-24-10-523 for four cases, the remaining case was 03-24-23-10-523).

Outbreak No. 4: Suspected Food Poisoning – Workplace

Approximately 25 people were unwell with fever, watery diarrhoea and lethargy following a catered workplace training event during October 2014. Cases had either attended the event or ate leftover food from the event. The premise that prepared food for the training event was inspected and it was found that a staff member involved in the sandwich preparation was previously unwell with gastroenteritis and had not observed the recommended 48 hour exclusion period from work. Five of the unwell people from the training event submitted specimens. All specimens were negative for standard bacterial and viral pathogens.

Outbreak No. 5: *Salmonella* Typhimurium phage type 9 – Restaurant

Seven cases of *Salmonella* Typhimurium phage type 9 were linked to a café in metropolitan Adelaide in October 2014. The index case was the owner and a food handler at the café, whose onset of illness was 2-8 days before the onset of the other cases. Upon investigation of the premises a further three food handlers were found to be unwell with gastroenteritis,

however specimens were not collected from these individuals. All six customers of the café reported eating sandwiches including a raw egg mayonnaise made onsite at the café. Samples collected from the café including eggs and raw egg mayonnaise tested negative for *Salmonella.* It is unclear whether the food handler was the source of the illness or the raw egg mayonnaise. All cases were found to have an identical MLVA profile; 03-15-08-11-550.

Outbreak No. 6: *Campylobacter* – Restaurant

A call was received from a doctor about three children with gastroenteritis who had eaten in a group of 22 people at the same hotel on the evening of 18th October 2014. A case control study was conducted by contacting individuals on the booking list from the hotel on the 18th of October. Seventy-four interviews were undertaken with 22 people reporting diarrhoea after the event. Five of these people tested positive for *Campylobacter*. Multivariate analysis indicated consumption of freshly cooked prawns was significantly associated with diarrhoeal illness (adjusted OR 8.45; p=0.000; 95% CI 2.56-27.85). An additional case of *Campylobacter* was identified who ate at the hotel on the 19th October, bringing the total number of cases with *Campylobacter* for this investigation to six and the total number of cases with diarrhoea to 23. An environmental inspection was conducted and no issues were identified at the premises. A trace back indicated that the batch of prawns used at the hotel was distributed to other food businesses, but no cases were associated with any other premises. Interviews were conducted with other cases of *Campylobacter* notified during the outbreak period and prawns were not consumed by these cases.

Outbreak No. 7: *Salmonella* Typhimurium phage type 9 – Restaurant

Eleven cases of *Salmonella* Typhimurium phage type 9 were associated with a café in Adelaide in December 2014, including four people who were hospitalised. Environmental investigations of the food premises identified a number of food handling and preparation practices that could have contributed to the outbreak. A raw egg aioli made at the café tested positive for *Salmonella* Typhimurium phage type 9. All cases and the raw egg aioli sample from the café were found to have an identical MLVA profile; 03-14-06-12-550.

Outbreak No. 8: *Salmonella* Typhimurium phage type 9 – Private residence

There was a report of gastrointestinal illness following a function at a private residence in December 2014. Twenty-four of the twenty-five individuals that attended the function were interviewed and fourteen reported experiencing diarrhoea following the event. Eight cases were confirmed to be *Salmonella* Typhimurium phage type 9. Most of the food at the function was home-made, except for some quiches which were purchased from a bakery. A cohort study was undertaken to identify the source of the illness using an online survey. Multiple food items were significantly associated with illness in the univariate analysis. Multivariate analysis revealed that a home-made tiramisu was the only food item significantly associated with illness (adjusted RR= 11.2; 95% confidence intervals 1.7-75.9; p=0.0004). Further information about the brand of eggs used to make the tiramisu was unable to be obtained. All cases were found to have an identical MLVA profile; 03-24-13-10-523.

Outbreak No. 9: *Salmonella* Typhimurium phage type 9 – Restaurant

Seven cases of *Salmonella* Typhimurium phage type 9 were identified who had eaten at a café in metropolitan Adelaide over a four day period in December 2014. No common food item was consumed at the café by all of the cases. An environmental investigation was undertaken, food samples taken from the café were found to be negative for *Salmonella*. Advice was provided to the staff and owner of the café on the production, storage and

handling of raw egg products. All cases linked to this outbreak were found to have MLVA profile 03-15-06-12-550, this profile was highly similar to the other outbreak linked to the same brand of eggs reported in the same month (Outbreak 7, one repeat difference at the second locus). An inspection at the common egg processing plant demonstrated control of relevant food safety practices.

Outbreak No. 10: *Salmonella* Typhimurium phage type 9 – Restaurant

Eight cases of *Salmonella* Typhimurium phage type 9 were identified in December linked to a café located in rural South Australia. The cases reported eating a variety of different foods. An environmental investigation found that most of the menu items at the café were served with raw egg aioli. Advice was provided to the owners about the safe handling, preparation and storage of the aioli. All cases were found to have the same MLVA profile; 03-24-13-10-523.

Outbreak No. 11: *Salmonella* Typhimurium phage type 135 – Restaurant

Seven cases of *Salmonella* Typhimurium phage type 135 were notified in February 2015 who had eaten at a café in rural South Australia, including one hospitalisation. One case was a food handler who worked at the café with a similar disease onset to the other cases. All cases reported eating at the café, and five (including the food handler) reported eating sundried tomato aioli that was made in-house and contained raw eggs. Inspections were carried out and advice was provided to café staff about the safe handling, preparation and storage of raw egg products. All seven cases had an identical MLVA profile; 03-12-09-11-523.

Outbreak No. 12: *Salmonella* Typhimurium phage type 9 – Restaurant

Seven cases of *Salmonella* Typhimurium phage type 9 in March 2015 were associated with eating at a hotel in metropolitan Adelaide. Two cases were hospitalised. EHOs visited the hotel, where food and environmental samples were taken for testing. *Salmonella* Typhimurium phage type 9 was isolated from three swabs taken from internal components of the stab mixer used to prepare raw egg aioli, soups and dressings. All seven human cases and the positive environmental swabs had an identical MLVA profile; 03-24-13-10-523.

Outbreak No. 13: *Salmonella* Typhimurium phage type 9 – Restaurant

Seven cases of *Salmonella* Typhimurium phage type 9 in March 2015 were associated with eating at a café in metropolitan Adelaide. Two of the cases were hospitalised. One case occurred in a café staff member who had not been involved in food handling and had a later date of onset than the other cases. No common single food item was identified, however five cases reported consumption of eggs in poached, scrambled, or omelette form at the café. EHOs provided advice to the staff and owner of the café on the production, storage and handling of egg products. The MLVA profile 03-15-06-11-550 was identical for five of the seven cases with the remaining two results pending.

Outbreak No. 14: *Salmonella* Typhimurium phage type 9 – Takeaway

Four cases of *Salmonella* Typhimurium phage type 9 were associated with a takeaway outlet in metropolitan Adelaide during March 2015, one of whom was a food handler at the shop. The reported date of onset of the food handler preceded the onset of other cases, however, it is uncertain if the food handler worked while symptomatic. MLVA profiling confirmed a match (03-14-08-11-550) between the food handler and one other case, with a further two MLVA typing results pending.

Outbreak No. 15: *Salmonella* subsp1 ser 4, 5, 12: i:- – Private residence

There was geographic clustering of *Salmonella* subsp 1 ser 4, 5, 12: i:- identified in April 2015. Interviews identified three people who had attended a work function at a private residence where pig and lamb were roasted on a spit. Grilled chicken was also served. There were reportedly another three people who were also unwell but were not tested. The source of the illness is unknown.

Outbreak No. 16: *Salmonella* Typhimurium phage type 9 – Restaurant

A report of an outbreak of gastroenteritis amongst guests at a hotel was received in April 2015. Eight cases of *Salmonella* Typhimurium phage type 9 (MLVA 03-24-11-10-523) and one additional case of gastroenteritis were identified. All of the cases had eaten eggs from a buffet breakfast at the hotel on the same day. Food samples are routinely retained by the hotel. The samples from the day of common exposure amongst the cases were tested. Scrambled eggs and cheese samples were positive for *Salmonella* Typhimurium phage type 9.

Outbreak No. 17: *Salmonella* Typhimurium phage type 135a – Private residence

There was an increase in *Salmonella* Typhimurium phage type 135a notifications in April 2015. Four cases had attended a party at a private residence in rural South Australia. All cases ate the same foods at the party including cold rice paper rolls with a sauce, but the source of the infection is unknown. The four human cases all had the same MLVA profile; 03-11-12-14-523.

Outbreak No. 18: *Salmonella* Typhimurium phage type 108 – Private residence

A *Salmonella* medical notification was received that mentioned multiple people who were unwell following a family gathering in May 2015. Further investigation identified nine out of 22 people who were unwell. Five people tested positive for *Salmonella* Typhimurium phage type 108. All of the food was prepared at home and included chicken and veal schnitzels, meat balls, pasta and salads. Raw chicken and veal schnitzels that were left over from the meal were stored in a freezer. The schnitzels were tested and both were positive for *Salmonella* Typhimurium phage type 108. The chicken and veal schnitzels were made at home using raw eggs, home-made bread crumbs and parmesan cheese.

Outbreak No. 19: *Salmonella* Typhimurium phage type 9 – Bakery

An outbreak of *Salmonella* Typhimurium phage type 9 occurred in June 2015. Thirty cases reported consuming Vietnamese rolls that were purchased from two bakeries that were owned by the same family. Ten additional people were reported to have gastroenteritis following eating at the bakery, but were not tested. The rolls were made with raw egg butter and an environmental investigation identified multiple poor practices in relation to handling the raw egg butter. An improvement notice was issued.

Table 1: Summary of foodborne disease investigations in South Australia during the period 1 July 2014 to 30 June 2015

No.	Month and Year	Organism	Location	No. ill	No. laboratory confirmed	Transmission	Evidence
1	Sept 2014	*S.* subsp 1 ser 4,5,12:i:-	Private residence	18	4	Suspected foodborne	D
2	Sept 2014	STm 44	Restaurant	12	12	Foodborne	M
3	Sept 2014	STm 9	School	5	5	Suspected foodborne	D
4	Oct 2014	Suspected food poisoning	Workplace	25	0	Suspected foodborne	D
5	Oct 2014	STm 9	Restaurant	10	7	Suspected foodborne	D
6	Oct 2014	*Campylobacter*	Restaurant	23	6	Foodborne	S
7	Dec 2014	STm 9	Restaurant	11	11	Foodborne	M
8	Dec 2014	STm 9	Private residence	14	8	Foodborne	S
9	Dec 2014	STm 9	Restaurant	7	7	Suspected foodborne	D
10	Dec 2014	STm 9	Restaurant	8	8	Suspected foodborne	D
11	Feb 2014	STm 135	Restaurant	7	7	Suspected foodborne	D
12	March 2015	STm 9	Restaurant	7	7	Foodborne	M
13	March 2015	STm 9	Restaurant	7	7	Suspected foodborne	D
14	March 2015	STm 9	Takeaway	4	4	Suspected foodborne	D
15	April 2015	*S*. subsp 1 ser 4,5,12:i:-	Private residence	6	3	Suspected foodborne	D
16	April 2015	STm 9	Restaurant	9	8	Foodborne	M
17	April 2015	STm 135a	Private residence	4	4	Suspected foodborne	D
18	May 2015	STm 108	Private residence	9	5	Foodborne	M
19	June 2015	STm 9	Bakery	40	30	Suspected foodborne	D

D – Descriptive; M – Microbiological; S – Statistical
STm – *Salmonella* Typhimurium

Cluster Investigations

A cluster is defined as an increase in a specific infection in terms of time, person or place, where the source and mode of transmission remains unknown.

Cluster No. 1: *Campylobacter* – Community

An increase in *Campylobacter* notifications was seen in a rural area of South Australia with onset of gastroenteritis from mid-June to early July. Of seven cases, six were interviewed with hypothesis-generating questionnaires, with commonly eaten foods being bread (6 cases), chicken (5 cases) and carrots (5 cases). Living on a rural property and having dogs as pets was also common (5 cases). Two cases were found to have eaten different meals at a common restaurant during their incubation period. The restaurant was referred to the local Environmental Health Officer for further investigation.

Cluster No. 2: *Salmonella* Hessarek – Community

Three cases of *Salmonella* Hessarek were notified in the first two weeks of September, corresponding in time to the identification of *Salmonella* Hessarek in chicken environment samples. Two cases ate chicken based meals from the same food court. Two further cases were identified in December and one of these cases also ate chicken based meals from the same food court. It was not possible to identify an individual premise at the food court for public health follow up. Three further cases were reported in January. Interviews with these cases found that all three had eaten the same brand of eggs at home during their incubation period. Overall, there were eight people in the cluster and seven had consumed chicken and six had consumed eggs during their incubation period.

Cluster No. 3: *Salmonella* Bovismorbificans phage type 4a – Community

In November 2014, two cases of *Salmonella* Bovismorbificans phage type 4a were notified in one week. The Australian *Salmonella* Reference Centre had begun reporting phage type 4a in July 2014. As this was a new phage type, an investigation was launched. There were nine cases reported during November 2014 to January 2015 and all were interviewed. Frequently eaten foods were different types of beef, chicken and milk (seven out of nine cases). From the cases notified in November and December, two of the cases ate at a common restaurant and three cases not linked to the restaurant all purchased fresh produce from specialty grocery store in the same area where the restaurant purchased some of its fresh produce from. A range of foods were sampled from the restaurant and no *Salmonella* was detected.

Cluster No. 4: *Salmonella* Saintpaul – Community

Eighteen cases of *Salmonella* Saintpaul were reported between the end of November 2014 and early February 2015. Sixteen of the cases were interviewed. Two of the cases were children who attended the same child care centre. Gastroenteritis was reported in some other children (24 hour duration) at the child care centre, but no specimens were collected and there were no further cases *reported*. Of the remaining 14 cases, 12 had consumed beef (steak: 10 cases, mince: 8 cases), ten had consumed chicken, and nine had consumed eggs and broccoli.

Cluster No. 5: Salmonella Typhimurium phage type 9 – Community

In December 2014, an increase was observed in notifications of *Salmonella* Typhimurium phage type 9, not associated with any point source outbreaks. A total of 68 sporadic cases were notified between 11 December 2014 and 9 January 2015 with dates of illness onset ranging from 7 December to 2 January. Frequently consumed foods identified through hypothesis generating questionnaires were chicken (47 cases), bread (42 cases), cheese (40 cases), milk, tomatoes and eggs (38 cases), and carrots (34 cases). There were two major MLVA types within this cluster: 03-24-13-10-523, and 03-14/15-06-12-550. This investigation has developed into a case-control study examining the risk factors for sporadic infection with *Salmonella* Typhimurium phage type 9. Questions focus on the consumption of eggs and raw egg products, the role of personal health behaviours and food handling practices in the home. This case-control study is ongoing at the time of reporting and will most likely continue until the end of 2015.

Cluster No. 6: *Salmonella* Typhimurium phage type 135a – Community

Four cases of *Salmonella* Typhimurium phage type 135a were reported within a single week in February 2015, of which three occurred in the same geographical region, prompting further investigation. Two of the four cases reported eating at a café in the outer metropolitan

region of Adelaide and were found to have an identical MLVA profile of 03-13-10-10-523. Of the remaining two cases, one had a closely-related MLVA profile of 03-14-10-10-523 and the other result is pending. Neither of these latter two cases had reported attending or consuming food at the cafe. The café was referred to local EHOs for further investigation.

Cluster No. 7: *Salmonella* Virchow phage type 8 – Community

Fifteen cases of *Salmonella* Virchow page type 8 were reported between the May 18 and June 8, when the average yearly number of notifications (2010-2014) was 4.6 notifications per year. Hypothesis generating interviews were conducted with the cases. Three restaurants were identified where two or more cases had eaten; restaurant A (2 cases), restaurant B (2 cases) and restaurant C (4 cases). All of the premises were inspected by an Environmental Health Officer. Frequently eaten foods within the home were eggs (11 cases), banana, carrots (10 cases) and chicken (9 cases). Seven people had consumed coriander, with five cases eating coriander in food from one of the restaurants and two at home. Suppliers of fresh herbs to each of the three restaurants were identified. The trace back did not identify any further information about a possible source. Samples of food (garlic, lettuce, spring onion, cucumber, mint, coriander, bok choy, ginger and basil) from suppliers were collected, but *Salmonella* was not detected in any of the samples. It was not possible to identify the source of the infection.

Cluster No. 8: *Salmonella* Virchow phage type 34 – Community

The *Salmonella* Reference Centre notified an unusual cluster of four cases of Salmonella Virchow phage type 34. An investigation was launched. A total of eight cases were reported in the cluster from May 27 to June 17. Five of the cases had consumed chicken and rye bread. The rye bread was different brands and purchased from different locations (e.g. large supermarket chains and small local bakeries). Three of the cases were children who attended the same child care centre. An environmental inspection was conducted.

Table 2: Summary of cluster investigations in South Australia during the period 1 July 2014 to 30 June 2015

No.	Month and Year	Organism	Location	No. ill	Transmission	Evidence
1	June 2014	*Campylobacter*	Community	7	Unknown	D
2	Sept 2014	*S*. Hessarek	Community	8	Unknown	D
3	Nov 2014	*S*. Bovismorbificans 4a	Community	9	Unknown	D
4	Nov 2014	*S.* Saintpaul	Community	16	Unknown	D
5	Dec 2014	STm 9	Community	68	Unknown	D
6	Feb 2015	STm 135a	Community	4	Unknown	D
7	May 2015	*S.* Virchow *8*	Community	15	Unknown	D
8	June 2015	*S.* Virchow *34*	Community	8	Unknown	D

D – Descriptive; M – Microbiological; S – Statistical

STm – *Salmonella* Typhimurium.

7. LOCAL GOVERNMENT ACTIVITIES UNDER THE FOOD ACT 2001

Under the *Food Act 2001* (the Act) it is a mandatory requirement for local government to provide the department with information on their activities. For the purpose of this Annual Report, a request for information was circulated to all councils. Councils are empowered under Parts 4 and 5 of the Act to ensure that hygienic standards are maintained in relation to the manufacture, transportation, storage and handling of food for sale under Chapter 3 of the Australia and New Zealand Food Standards Code. They are also responsible for taking measures to prevent the sale of unfit food and to investigate complaints related to the sale of unfit food. EHOs are authorised under the Act to issue orders and notices and take action for breaches.

Authorised Officers

All EHOs must be authorised under Division 3, Section 94 of the Act to be able to enforce the Act. EHOs must have the necessary skills and knowledge to effectively perform their food related responsibilities to gain authorisation.

Table1.Authorised officers' details

Authorised Officers	**Full-Time**	**Part-Time**
(Currently working in local government)	114	52*

* Numbers may be duplicated where EHOs are employed in more than one council

Inspections

To gain a better understanding of how inspections are organised and undertaken by local government, it is necessary to establish the number and make up of food businesses across South Australia. The following tables establish how many food businesses exist and the proportion of businesses by food safety risk categories. These figures have been combined with the number of inspections conducted by local government to ensure that planning and inspection frequencies are appropriate and maintained.

This year SA Health commenced implementation of the Food Business Risk Classification (FBRC) based on the national food safety risk profiling framework that allocates food businesses into risk classifications, based on their likelihood of contributing to foodborne disease and potential magnitude of that contribution.

The FBRC allows council resources for monitoring and enforcement to be aligned with the inherent food safety risk of the business, taking into account the performance of the business. During this year councils commenced transition from the former system using low, medium and high risk groups to the new FBRC (Refer to, "Risk Classification and Inspection Frequencies, Page 15).

In this overlap year, councils began reporting against both the former and the new priority classification in 2014-2015 reporting period. As a consequence, this year's report contains information relating to food premises inspections and enforcement actions in two separate formats that are not able to be amalgamated.

Table 2. contains information relating to the former Low- Medium –High classification system.
Table 3. contains information relating to the new risk classification system. As from 2015-2016 all food businesses inspected will be reported in the new risk classification system only.

Table 2. Former Food Business Risk Classification

Inspections	Food Safety Risk Classification			Total
	High	Medium	Low	
Number of Businesses	287	2284	1163	**3734**
Inspections Conducted	257	838	358	**1453**
Follow-up Inspections	148	301	25	**474**
Inspections from Complaints	19	66	11	**96**

Table 3. New Food Business Risk Classification

Inspections	Food Safety Risk Classification				Total
	P1	P2	P3	P4	
Number of Businesses	4274	3538	1742	1187	**10741**
Inspections Conducted	3928	2751	808	187	**7674**
Follow-up Inspections	1939	770	113	22	**2844**
Inspections from Complaints	391	128	24	1	**544**

Inspection Fees

The *Food Regulations 2002*, Part 4 Section 11 makes provision for enforcement agencies to impose an inspection fee. Following is a summary identifying the policy of Councils regarding imposing an inspection fee.

Table 4. No of Councils Charging Inspection Fees

Council Inspection Fees	No. of Councils
Charging Fees	35
Not Charging Fees	29

Audits

Since 5 October 2008 businesses captured under Food Safety Standard 3.3.1 (Food Safety Programs for Food Services to Vulnerable Persons) have required regulatory food safety audits.
In 2014-2015 local government food safety auditors have continued to conduct food safety

audits of aged care, child care and private hospitals at a frequency determined by the performance of individual sites, in line with the priority classification for these businesses.

Table 5. Local Government Audit of Aged Care, Child Care and Private Hospitals

	Aged Care		Child Care		Private Hospitals		Others		TOTAL
Number of Captured Businesses	**282**		**289**		**36**		**48**		**654**
Number of Businesses Audited	**259**	92%	**249**	86%	**25**	69%	**36**	75%	**569**

*Businesses may receive > one audit per annum

The table below identifies the policy of councils regarding the charging of a fee for audits.

Table 6. No of Councils Charging Audit Fees

Council Audit Fees*	No. of Councils
No of councils carrying out audits	24
No of councils charging audit fee	12

* Not all councils conduct audits and as a result do not charge for audit services.

Complaints

Consumer enquiries and reports of illness, non-compliant businesses or food, constitute an important source of information. In addition, they provide: opportunities for the public to interact with EHOs first hand, a ‘shop window’ for food safety and give EHOs the opportunity to promote food safety. All complaints are logged and generally risk classified to ensure that the most serious cases are dealt with as a priority. Table 7 has classified complaints/reports into a list of most likely sources, in addition to reporting on whether the complaint and investigation was found to be valid or verified by an authorised officer.

Table7. Breakdown of Enquiries by Category

Type	Complaints/Reports	Verified
Foreign Matter in Food	100	33
Micro Contamination	107	25
Chemical Contamination or Residue	13	3
Alleged Food Poisoning	241	12
Confirmed Food Poisoning	64	38
Unclean Premises	124	50
Personal Hygiene or Food Handling	156	56
Pest Infestation	60	33
Refuse Storage	57	36
Labelling Issues	19	10
Others	141	59
TOTAL	**1082**	**355**

Enforcement Actions

The *Food Act 2001* makes provision for authorised officers to apply enforcement actions to improve food safety outcomes for the public. Enforcement actions may take the form of written warnings, improvement notices, prohibition orders, expiations or prosecutions. These actions are applied using a graduated and proportionate response.

Table 8 addresses enforcement actions relating to inspections conducted under the former risk classification system detailing enforcement actions applied to each food industry sector.

Tables 9 to 12 addresses enforcement actions relating to inspections conducted under the new system described on page 15. Written warnings making up the largest single action applied, progressing to improvement notices and expiations as food businesses fail to respond or issues became more serious.

It should also be noted that the numbers in Table A differ from the numbers recorded in Tables B, C and D as warnings, improvement notices and expiations may contain multiple issues resulting in a variation in numbers.

Tables 13-15 remain collective totals from all inspections or audits conducted under Food Safety Programs.

Table 8. Number of Enforcement Actions by Food Industry Sector

Business type	No. written warnings issued	No. improvement notices issued	No. of Prohibition Orders issued	No. Expiations issued
Aged care	13	1	0	0
Bakery	50	31	0	4
B&B/motel	6	1	0	0
Café	104	28	1	4
Canteen	13	1	0	0
Caterer	4	3	0	0
Charitable	10	1	0	0
Child Care	11	1	0	0
Club	34	0	0	0
Deli	10	8	0	0
Delivered meals	0	0	0	0
Distributor	0	0	0	0
Farm Gate Sales	0	0	0	0
Fishmonger/seafood	1	1	0	0
Fruit and veg	13	9	0	4
Function centre	7	2	0	0
Hospital	1	0	0	0
Hotel/pub tavern	33	23	0	11
Liquor store	43	6	0	0
Manufacturer	0	1	0	0
Mobile food van	1	0	1	0
Restaurant	23	39	1	24
Service station	87	13	0	3
Snack bar/kiosk	13	10	0	2
Stall	4	1	0	0
Supermarket	2	6	0	13
Takeaway	34	38	1	16
Temporary Business	92	19	0	4
Other	12	1	0	1
Total	**621**	**244**	**4**	**86**

Table 9. Number of Enforcement Actions by Retail Sector

Retailer	No. written warnings issued	No. improvement notices issued	No. of Prohibition Orders issued	No. Expiations issued
Bakery products	0	0	0	0
Bakery products Perishable fillings	3	4	0	1
Continental Type Delicatessen food	0	0	0	0
High risk food - perishable	5	2	0	0
Low risk packaged food	0	0	0	0
Medium risk food - perishable	0	0	0	0
Raw Meat & Poultry	0	0	0	0
Seafood(excludes Processing of Bivalve mollusc)	0	0	0	0
Total	**8**	**6**	**0**	**1**

Table 10. Number of Enforcement Actions by Food Service

Food Service	No. written warnings issued	No. improvement notices issued	No. of Prohibition Orders issued	No. Expiations issued
Catering offsite activity	0	0	0	0
Catering onsite	5	2	0	2
Medium risk foods perishable	71	3	0	0
Restaurants and takeaway RTE Food-Prepared in advance	70	57	0	13
Restaurants and Take away food RTE food - Express order	20	10	0	10
Restaurants and takeaway RTE Food-no raw preparation	1	0	0	0
Bakery products, perishable fillings processing	0	1	0	0
Prepared in advance	0	0	0	0
Total	**167**	**73**	**0**	**25**

Table 11. Number of Enforcement Actions by Food Transporter

Food Transporter	No. written warnings issued	No. improvement notices issued	No. of Prohibition Orders issued	No. Expiations issued
Bulk flour storage distributor	0	0	0	0
Bulk milk collection distributor	0	0	0	0
Dairy produce distributor	0	0	0	0
Dry goods and beverages distributor	0	0	0	0
Frozen food distributor	0	0	0	0
Fruit and vegetables distributor	0	0	0	0
Perishable ready to eat, packaged, medium risk food distributor	0	0	0	2
Perishable, ready to eat, packaged, high risk food distributor	0	0	0	0
Processed meat distributor	0	0	0	0
Seafood distributor	0	0	0	0
Total	**0**	**0**	**0**	**2**

Table 12. Number of Enforcement Actions by Processor / Manufacturer

Processor / Manufacturer	Written warnings issued	Improvement notices issued	Prohibition Orders issued	Expiations issued
Bakery products Perishable fillings processing	1	4	0	0
Baby Food processing	0	0	0	0
Beverage processing	0	0	0	0
Canned food processing	0	0	0	0
Canned food processing very small producer & high acid food	0	0	0	0
Chocolate processing	0	0	0	0
Chocolate processing small producer	0	0	0	0
Cereal processing	0	0	0	0
Confectionary processing	0	0	0	0
Cook-Chill food Short shelf-life processing	0	0	0	0
Cook-chill food extended shelf life processing;	0	0	0	0
Cook-frozen food processing	0	0	0	0
Dairy processing (not including soft cheese)	0	0	0	0
Dairy processing - Soft cheese processing	0	0	0	0
Egg Processing	0	0	0	0
Fruit and Vegetables processing	0	0	0	0
Fruit and vegetable processing frozen	0	0	0	0
Fruit juice, Pasteurisation processing, shelf stable processing	0	0	0	0
Fruit and vegetable processing Frozen Blanch /Small producer	0	0	0	0
Infant formula product processing	0	0	0	0
Meat Processing, Abattoir/ Boning Room	0	0	0	0
Meat Processing, Fermented meat Processing, Small Goods Processing	0	0	0	0
Oils and fats processing	0	0	0	0
Peanut Butter processing	0	0	0	0
Peanut Butter processing Small Producer	0	0	0	0
Poultry processing	0	0	0	0
Prepared not ready to eat food processing	0	0	0	0
Prepared ready to eat food processing	4	0	0	0
Seafood processing	2	0	0	0
Seafood processing RTE and shelf stable	0	0	0	0
Seafood processing -Mollusc processing	0	0	0	0
Snack chips processing	0	0	0	0
Spices and dried herbs processing	0	0	0	0
Spices and dried herbs processing small producer	0	0	0	0
Sprout processing	0	0	0	0
Sushi processing	0	1	0	0
Vegetables in oil processing	0	0	0	0
Total	**7**	**5**	**0**	**0**

Table 13. Enforcement Actions by Number - Referenced to Standard 3.2.1 (Food Safety Program (FSP)

Reason for enforcement activity	Written warnings	Improvement notices	Prohibition Orders	Expiations	Prosecutions
FSP not prepared, implemented, maintained and monitored	1	2	0	0	0
FSP not audited at the frequency determined by the auditor	0	0	0	0	0
FSP not revised so as to comply with the regulations	0	0	0	0	0
FSP audit report not retained by business for four years	0	0	0	0	0
Sub-Total	1	2	0	0	0

Table 14. Enforcement Actions by Number - Referenced to Standard 3.2.2 Requirements

Reason for enforcement activity	Written warnings	Improvement notices	Prohibition Orders	Expiations	Prosecutions
Skills and Knowledge	28	35	0	2	2
Notification	18	5	0	2	0
Food Receipt	29	20	0	4	1
Food Storage	216	146	1	17	1
Food Processing	55	88	1	4	0
Food Display	64	28	0	3	0
Food Packaging	7	6	0	2	0
Food Transportation	13	0	0	0	0
Food Disposal	3	6	0	2	2
Food Recall	7	1	0	0	0
General Req of Food Handlers	17	18	0	1	0
Health & Hygiene of Food Handlers	33	62	0	7	0
General Duties of a Food Business	16	38	1	2	0
Cleanliness	142	240	2	29	2
Cleaning and Sanitising	267	115	1	4	1
Maintenance	266	68	1	2	0
Temperature measuring devices	58	44	0	1	0
Single use items	21	14	0	0	0
Animals and Pests	34	47	2	6	1
Alternative methods of compliance	0	4	0	0	0
Sub-Total	**1294**	**985**	**9**	**88**	**10**

Table 15. Enforcement Actions by Number - Referenced to Standard 3.2.3 Requirements

Reason for enforcement activity	Written warnings	Improvement notices	Prohibition Orders	Expiations	Prosecutions
General Requirements	13	58	2	0	1
Water supply	12	4	0	0	0
Sewerage & waste water disposal	11	10	0	0	0
Storage of garbage & recyclables	38	7	0	0	0
Ventilation	23	3	1	0	0
Lighting	25	7	0	0	0
Floors	32	38	2	0	0
Walls and ceilings	44	50	3	0	0
Fixtures, fittings and equipment	124	84	2	2	0
Hand washing facilities	186	77	2	4	0
Storage facilities	28	29	0	0	0
Toilet Facilities	16	10	0	0	0
Food Transport vehicles	4	2	0	0	0
Others	10	10	0	31	2
Sub-Total	**566**	**389**	**12**	**37**	**3**
Total of Tables 14 & 15	**1860**	**1374**	**21**	**125**	**13**

Editorial Note

Due to unforeseen circumstances data from the District Council of Wakefield Plains is not shown in the above tables.

Prosecution Register

SA Health publishes on its website details of businesses or individuals that have been found guilty by a Court of a breach of the *Food Act 2001*. This website is intended to provide information to the community regarding successful Food Act prosecutions, the most serious action available, undertaken by local councils and SA Health. Since the last reporting period three additional businesses has been added to the prosecution register and two business removed as the period of notification has expired. This information can be viewed on “The Food Act Prosecutions Register” on the SA Health website:

http://www.sahealth.sa.gov.au/wps/wcm/connect/Public+Content/SA+Health+Internet/About+us/Legislation/Food+legislation/Food+prosecution+register

Highlights of other Local Government activities

Local government undertakes additional food safety programs in support of their statutory roles. These programs include food safety training courses, food compliance surveys, presentations to food handlers and primary school students, and special activities for National Food Safety Week.

Adelaide City Council

The objectives of instigating a new software record management system were inclusive of improved record keeping, increase communication with proprietors, enable inspection mobility (in terms of onsite data input) and synchronisation with Council's corporate systems. The introduction of a mobile software solution (Health Manager) has reduced the administrative burden of EHOs, threefold, for food inspections. Not only has the Health Manager module enabled quicker turn-around time between inspection and report dissemination it has also improved consistency amongst EHOs, on the way observations and actions required are recorded (both on the server and to food businesses).

Health manager, which captured necessary detail of businesses, including risk rating, has also enabled the Food Safety Rating of the business to be captured. This scoring system along with risk will enable considerations to be made when prioritising inspections whilst demonstrating the need for EHO presence. Having improved software and mobility is not only a benefit to Environmental Health for day-to-day functions but is also a benefit to businesses and the general public with improved turn-around response time, quick access to educational material and easier reporting that is necessary by internal/external stakeholders. Since implementation, Council has found ways to enhance the off-the-shelf product to improve efficiency and effectiveness of the product. In the short timeframe it has been in place Council has been requested by four SA Councils for demonstrations. One Council has requested and obtained some setting that have been created and one advised will be requesting enhancement of their own system to match.

Council commenced the SA Health led, voluntary food safety rating scheme in conjunction with nine other Councils in October 2014. The developed inspection form was applied to the Health Manager module to create ease in adding inspections to the record management system, whilst also ensuring continuous efficiencies were realised in obtaining new software. Additional benefit has included that any non-compliances observed are recorded only to the linked/related questions, which creates consistency within the team.
EHOs have commented that the new inspection form has changed the focus of inspections from the high focus of ascetics (cleaning, structure etc.) to food processing and safety.

EHOs conducted a number of proactive food safety presentations to a variety of audiences. Presentations are tailored to audiences and cover relevant aspects of food safety. Presentations conducted include:

- Food safety and environmental health profession in general at Christian Brothers College, Food & Hospitality Classes as well as to students through Adelaide City Councils Economic Development Program.
- Food safety & handling presentation to the Chinese Welfare group.
- Various pre-event meetings with food vendors, operating temporary stalls, particularly at community events.

Food safety information packs are sent to all known food stalls, mobile vendors (from intra and interstate) participating at events or in the 'Splash' (street vendor program) within Adelaide City Council jurisdiction to ensure food handlers are aware of their food safety requirements. Furthermore, meetings with event organisers, and where necessary, presentation with food stall holders, are conducted pre-event. EHOs visit a number of events and undertake inspections of food stalls to ensure compliance.

Adelaide Hills Council

In conjunction with TAFE SA Adelaide Hills Council conducted two food safety short courses in November 2014 and March 2015. These three hour, accredited courses held at the Council Offices were offered at a cost of $95 and cover basic food safety aspects such as potentially hazardous foods and temperature control, food handler hygiene and legislation. They have been attended by employees of local food businesses as well as members of community groups and sporting clubs. Feedback has been very positive. These courses have had a noticeable effect on food safety awareness in many food businesses and it is expected that they will continue into the future.

Alexandrina Council

TAFE Food Safety Training was held on 23 February 2015 and 9 June 2015. This project was undertaken as Alexandrina want to educate food businesses in this region of the importance of food safety. TAFE SA had been engaged to undertake the training as this provided certification to those that attended a valuable asset for those working in the food industry. Alexandrina also funded part of the course to bring down the cost to food handlers in the community attending this course. TAFE SA with the assistance of the Environmental Health team was able to deliver informative sessions which ran for three hours. Following the training, participants were required to undertake a questionnaire to ensure their understanding of the topics covered. TAFE SA marks the questionnaires and the participants are mailed a certificate. Approximately 100 people undertook the course in total this year.

Barossa Council

Council continues to combine with TAFE Regional SA to deliver an accredited food safety short course. Prospective participants are contacted by mail advising of the availability of the course together with relevant information on the Council website. The three hour course explains the intent of the Food Act, Regulations & Food Standards Code as well as reminding participants of their legal responsibilities and giving an easy-to-understand presentation on basic food science.

In 2014-2015 two courses were facilitated by Council and attracted 27 attendees including representatives from local retail, manufacturing, primary schools and community service groups.

City of Charles Sturt

In the 2014-2015 reporting period, 59 food businesses were awarded with Deliciously Safe (full compliance). Since the program’s inception in 2009, a 25% increase in compliance with the Food Safety Standards amongst food businesses within the City of Charles Sturt has been observed.

The delivery of food safety education information to food businesses continued throughout this reporting year with the ‘Food News’ newsletter distributed bi-annually. Food News provides interesting articles and information to assist food businesses to meet the requirement of the Food Act. The latest edition of Food News focused on food handlers not attending work when ill.

City of Holdfast Bay Council

The City of Holdfast Bay ran a very popular series of hand washing demonstrations to primary school children, preparing our future potential food handlers with one of the key food safety fundamentals. This was done using the glitter bug hand washing kit and was popular with both the children and the adults.

We also continue to run the highly successful I'm Alert online food safety training program which to date has trained and given certificates to 2302 food handlers.

City of Marion

The City of Marion has provided food handler training at a cost for a Child Care Centre and a nursing home, who wanted to ensure that their staff had adequate skills and knowledge. A Certificate of attendance was provided to the attendees.

City of Marion EHOs have provided many informal education/presentation sessions regarding safe food handling upon request. This included school groups, community groups and adult education sessions through the City of Marion's Neighborhood and Community Centers.

EHOs hosted a workshop for students enrolled in the Post Graduate Diploma in Environmental health on the principles of carrying out a food inspection.

City of Mitcham

The City of Mitcham continued delivering free food safety training sessions to food handlers within the Council area this financial year. Each session covers the basics of food safety and the responsibilities of food handlers under the relevant legislation.

The training program was well received by participants and continues to be in very high demand as per previous years. The sessions provide participants with critical food safety information and a hands-on opportunity to develop skills such as the correct use of a thermometer and safe storage of food items in cool rooms. Upon completion of the training session the participants receive a Certificate of Attendance and take home with them a comprehensive food safety workbook and various fact sheets.

The Environmental Health team also provided additional food safety training sessions where possible to various businesses including Flinders University SA, TAFE SA – Urrbrae, Cafes/Restaurants, local schools and Child Care Centres. In total, our EHOs conducted 24 food safety training sessions to various key food handlers in the local area this reporting period.

A quarterly food safety newsletter was developed by the Environmental Health team during the reporting period and is provided to food businesses within the Council area through the post. The newsletter allows Council to have regular contact with food businesses and aims to create a greater awareness of food safety responsibilities, issues and hot topics. This initiative was implemented during this financial year and will continue on in the future. General food safety information and advertising of the training sessions was also conducted through Mitcham Community News and our website.

City of Mount Gambier

City of Mount Gambier's Environmental Health staff in partnership with TAFE SA conducted a number of Food Safety Short Courses for local food handlers. There were 4 sessions held which were well attended with a total of 76 food handlers completing the accredited course. This year there was a strong focus on attendees taking the educational resources back to their workplace and sharing with staff as a refresher. In addition to this training, Council continues to promote the I'm Alert Food Safety online training available via Council's website. Council's subscription to provide this free online training option was accessed by 635 individuals during the 2014-2015 financial year.

The SA Community Foodies program was held locally in Mount Gambier at the beginning of 2015. This is a South Australian nutrition program that aims to educate volunteer community members on making healthier food choices. Participants who graduate from this course, 'foodies', then help to spread this knowledge locally through a number of activities and classes. Council's Community Health officer conducted the Food Safety module of the course to help make participants aware of the Food Safety Standards and provided educational resources for them to take away.

City of Port Lincoln

Council has recently commenced protein swabbing of food contact surfaces in regulated food premises. Pro-Clean (Rapid Protein Food Residue testing) swabs are used on surfaces which are cleaned infrequently throughout the food handling period. The science behind the rapid response swabs is explained to food handlers present and the effectiveness of their cleaning regime assessed. The purpose of the swabbing is to encourage deeper thinking by food handlers into their cleaning methods and help to instil confidence in the use of sanitising solutions. So far the exercise has been well received and others yet to be inspected have requested it. One of the schools has incorporated the chemical reaction occurring within the swab into the Year 12 hospitality course.

Eastern Health Authority (EHA)

During 2014-2015 a review of EHA food training program 'Preventing Kitchen Nightmares – A Guide to Food Safety Fundamentals' was reviewed. The purpose of the review was to identify the types of food business that commonly attend the training and provide up to date and relevant information of food safety matters specific to these groups. The review is also aimed at identifying alternative methods of training and new target groups. During this time two public training sessions were made available and one private training to a not for profit organization was provided.

During the year the 'EHA Special Events' information booklet and fact sheet was reviewed. The booklet was condensed to a two sided information sheet along with a notification form for both event organisers and stall holders to complete. The change made to the booklet was aimed at encouraging event organisers and stall holders to actively read the food safety information and submit the required notification forms. Our Constituent Council event organisers have advised that following the release of the updated booklet, the return rate for the notification forms has significantly improved. This has enabled officers to have a better understanding of how many stall holders and what types of food is being sold at these events prior to the day of the event. It has also enabled stall holders to get a better understanding of their responsibilities when selling food at events.

Kingston District Council

Council continues to offer to all food premises the FoodSafe Program. The majority of businesses have embraced the program and some have completed and others are currently working towards completing the program. The aim is to declare Kingston a FoodSafe town.

In conjunction with TAFE SA, Council supports these courses to be offered to the Region. Every year the venue is rotated between Robe and Kingston. Unfortunately no session was held in Kingston this year due to lack of numbers registered.

Mid Murray Council

Mid Murray Council continues to be proactive with food safety education and has facilitated two well attended accredited food safety training courses for food handlers. A total of 37 people completed this training.

Councils Environmental Health Officer presented a 4 hour food safety training session to the Community Foodies group who promote healthy eating to the community at large. The modules presented included a power point presentation and a hands-on food preparation activity.

The distribution of quarterly news letters to all food businesses highlighting issues identified in recent inspections, updates on various matters and information about certain bacteria.

The Mid Murray Council is one of nine Councils in SA that have volunteered to participate in the Food Safety Rating Scheme, an initiative piloted by SA Health.

District Council of Mount Barker

Council continued with its partnership with TAFE SA offering accredited food safety training sessions to food handlers. Two sessions were held during the year with 20 food handlers from commercial and volunteer organisations attending. Participants were awarded a certificate upon completion of the session. Council provided funding to Hills Volunteering for the purpose of conducting food safety training to volunteer food handlers. Two sessions were run: Food Safety and Handling and Food Safety and Hygiene.

District Councils of Mt Remarkable & Peterborough

Council continue to provide temperature validation tabs (accurate to within +/- 1 degree centigrade). The thermal temp-tabs are distributed to certain food businesses to assist in the mitigation of risk from potential transmission of harmful pathogens. Temp-tabs may assist food businesses in mitigating risks through allowing for thermal operational checks on equipment such as dishwashers and equipment used for laundering services associated with food preparation and food service. For example this may be associated with laundering of protective clothing, dish clothes and cotton food service drying towels, or to assist in validation of other thermal pasteurisation steps being undertaken in connection with the business operation. Food operators continue to provide positive feedback for Councils assistance in risk mitigation through providing Temp-Tabs to monitor measureable outcomes.

Council continue to offer Food Safety Information Sessions, run by Council's Environmental Health Practitioner for those operators who have had little or no food safety knowledge training. The sessions are also attended by food handlers who have not kept up with current food safety requirements and advancements. Since its inception in 2009 feedback from attendees support continuation of the program particularly in remote regional areas.

District Council of Orroroo Carrieton

The Environmental health section continues to run Food Safety Information Sessions made available for assisting food business operators and food handlers in aspects of the safe food handling and covering food standards such as food handling practices, food temperature control and safe delivery, storage, manufacture and sales of food related products.

District Council of Robe

Council continues with promoting the FoodSafe Food Handler's Training Program. Currently there are food premises undertaking the Program. It is hopeful more food businesses complete the Program and are awarded with the FoodSafe accreditation.

The successful partnership between TAFE SA and the Robe Council for the delivery of food safety training has gone from strength to strength with sessions available over the coming months in Millicent, Penola, Mount Gambier, Naracoorte, Wattle Range Council, Kingston, and this year expanding to areas such as Meningie and Mannum.

The Robe Council supports this important initiative to address the needs of local businesses and community groups and improve the level of food safety awareness in the region. This nationally accredited training will assist food handlers in developing the required skills and knowledge to ensure food is handled in a safe and hygienic manner. The training covers a number of competencies including food handling and storage, the legal requirements of food safety, personal hygiene, temperature control and the prevention of food contamination.

The training session can assist businesses in the induction of new staff members, especially those employees who may be new to working in the food sector. It is also of value to existing staff that may need to refresh their skills and knowledge. Participants, upon successful completion of the training unit will receive a statement of attainment.

On 20 March 2015, Robe hosted an afternoon training session. It was well attended with 14 people registered and some of these participants that came along were from Kingston. This course was held free due to state funding available for remote townships.

Sandwiches with high risk fillings, mostly chicken were purchased as part of a food sampling program and forwarded to the Food and Environmental Laboratory SA Pathology for analyses. Samples were purchased in various food outlets in Robe on 27 October 2014. The food purchased included, four chicken sandwiches, one ham wrap, one egg sandwich and one ham croissant. There were four different microbiological test conducted on the samples and these included Listeria, Faecal Coliforms, E coli and Coliforms.

All laboratory results showed that there was no detection of pathogenic organisms found in any of the foods purchased. It is a great indicator of how food is being prepared, handled and stored and also shows how effective their cleaning and general hygiene practices are. All food businesses involved received a letter informing them of the food sampling results and copies of the laboratory results were also attached.

Council owned buildings such as the Works Depot, Caravan Park, Casuarina Lodges – rental units, sports grounds – netball, golf, football are connected to rainwater tanks.

There has been an extra 2 samples added to the monitoring program since last year where Council again took rainwater samples of all the rainwater tanks to determine suitability. A total of 13 samples were taken and sent to SA Pathology to check for potability. There was one sample that had a high E.coli count of 2,400 organisms per 100ml. This tank was decontaminated and re-tested and results showed no further contamination. Signs have been placed on external and internal taps where drinking water is sourced by rainwater.

District Council of Tatiara

The Councils EHO has prioritised implementation of the South Australian Food Business Risk Classification system throughout the 2014-2015 financial year. More than 80% of notified businesses have had risk based analysis completed and are now classified according to food sector type and risk.

Food safety training was offered throughout the district during the past 12 months. More than 50 food handlers successfully completed the training package, increasing individual skill sets and contributing to the overall safe handling of food within the district.

City of Playford

The 2014-2015 year saw the City of Playford's Environmental Health Team restart our bi-annual "Playfood" food safety newsletter for food businesses. Distributed to over 500 food businesses in the Playford area, the first edition of the revamped publication featured articles on:

- Australian Food Safety Week
- The temperature danger zone for potentially hazardous foods
- Using thermometers correctly
- Cooling food safely
- Accepting food deliveries

This edition also featured an introduction to all our EHOs including the designated food work areas, contact details, and information on how EHOs can assist food businesses with meeting their food safety obligations. In order to encourage environmentally friendly practices, the issue also featured a competition where food businesses could subscribe to the publication via email or view on our website rather than receive a paper copy, with the prize being a probe thermometer complete with 12 months calibration certificate.

Previously the City of Playford only offered the "I'm Alert" online training course to assist food businesses and food handlers with meeting their skills and knowledge requirements. While the online training had been fantastically received, with over 2,000 participants, EHOs found that the course to be very basic and not really helping to explain the Food Safety Standards. Thus food businesses were still struggling to meet the skills and knowledge requirement and getting lots of non-compliances at inspections.

In a proactive approach in assisting and supporting City of Playford food businesses and food handlers, EHOs developed an intensive food safety training program with 3 courses being run in the 2014-2015 year. Attendees consisted of food handlers from businesses, volunteers and community groups. The course focusses on how food handlers and businesses can meet the legal requirements for food safety and explains why these requirements are so important when selling food to the public. A comprehensive take home manual is also provided along with a certificate of participation for attendance.

Participant evaluations indicate that 100% of respondents felt they would be able to easily apply what they learnt into their food handling activities. Inspections at premises where food handlers have attended training have noted improvements in general food handling and safe practices

City of Salisbury

The City of Salisbury published an edition of ‘Salisbury Food’ in the reporting period as part of our initiatives to educate food businesses. The publication was distributed to all food businesses in the Council area. The publication covered a range of food safety topics including SA Health Food Safety Rating Pilot, recent prosecutions, rice food safety and effective sanitising.

City of Salisbury participated in the SA Health Pilot Food Safety Rating Scheme which commenced in October 2014. A total of 242 rating assessments were completed for eligible businesses.

Coorong District Council

During this reporting period, two Food handling and Safety Training Courses were organised. The two courses were hosted by Council and presented by TAFE SA with over 40 participants. The use of an accredited training organisation provides the participants with a recognised certificate of achievement that assists business owners in providing relevant professional development to their staff.

Council takes every opportunity available to promote its food hygiene and food safety programs including talks at the local schools during Pet Awareness Workshops and attending Special Event Days such as the Tintinara Wool Show and Auction, the Family Fun Day at Meningie and the Coonalpyn Show.

Rural City of Murray Bridge (RCMB)

The Council continues to be proactive with food safety education and has facilitated three accredited food safety training courses for food handlers; a total of 46 people completed this training during 2014-2015.

RCMB Aboriginal Health Fair 2014 – coincided with Food Safety Week and was supported with a stall promoting food safety with food related activities for children. The fair was well attended and assorted trinkets with food safety messages were included in a show bag for around 100 children.

Council`s Environmental Health Officer presented a 4 hour food safety training session to the Community Foodies group who promote healthy eating to the community at large. The modules presented included a power point presentation and a hands-on food preparation activity.

Councils EHOs also provided presentations to schools and community groups to promote the importance of safe food handling practices.

The Rural City of Murray Bridge is one of nine Councils in SA that have volunteered to participate in the Food Safety Rating Scheme initiative piloted by SA Health at the request of the Minister for Health.

Wattle Range Council

The successful partnership between TAFE SA and the Wattle Range Council for the delivery of food safety training has gone from strength to strength with sessions available over the coming months in Millicent, Penola, Mount Gambier, Naracoorte, Kingston, and this year expanding to areas such as Meningie and Mannum.

The Wattle Range Council supports this important initiative to address the needs of local

businesses and community groups and improve the level of food safety awareness in the region. This nationally accredited training will assist food handlers in developing the required skills and knowledge to ensure food is handled in a safe and hygienic manner. The training covers a number of competencies including food handling and storage, the legal requirements of food safety, personal hygiene, temperature control and the prevention of food contamination. The training sessions can assist businesses in the induction of new staff members, especially those employees who may be new to working in the food sector. It is also of value to existing staff that may need to refresh their skills and knowledge. Participants, upon successful completion of the training unit will receive a statement of attainment.

On 11 May 2015, Millicent hosted a morning training session. It was the biggest ever number of attendees that enrolled for the Course. There were 42 people that participated and some came as far as Kingston to attend. This course was held free due to state funding available for remote townships.

Sandwiches of high risk fillings, mostly chicken, were purchased and then forwarded to the SA Pathology in Adelaide for analyses. Samples were purchased in Beachport, Penola and Millicent on 30 April 2015.

Four different microbiological tests were conducted on the samples to detect the presence of Listeria, Faecal Coliforms, E.coli and Coliforms. All laboratory results showed that there was no detection of pathogenic organisms found in any of the foods purchased. It is a great indicator of how food is being prepared, handled and stored and also shows how effective their cleaning and general hygiene practices are. All food businesses involved received a letter informing them of the food sampling results and copies of the laboratory results were also attached.

City of West Torrens

The City of West Torrens continued to provide informal training sessions and presentations on hygienic food handling practices and food safety to community groups, organisations and other interested businesses. The sessions are focused on improving the skills and knowledge on food handling to the attendees. The I'm Alert food safety training program continues to be provided on Council's web site. The program is promoted to businesses and individuals during inspections, audit and presentations to community groups.

The Environmental Health Team undertook a campaign to encourage food premises to maintain their garbage and recyclable storage areas in accordance with the Food Safety Standards. This was prompted by officers identifying that food premises were neglecting that these areas are considered as part of their food business. A letter was sent to all food premises detailing their obligations relating to the storage of garbage and recycling materials. A public health fact sheet on this topic was develop and included in the mail out. The aim of the fact sheet was to inform food businesses of their requirements and encourage compliance. An A3 poster was also developed, which has been distributed to food premises during inspections. This has been used as an opportunity for the officers to discuss the storage of rubbish and recyclable material with the proprietors/managers of the food premises and improve any deficiencies that may be present.

City of Whyalla

Food Business Newsletters are devised and distributed to all food businesses at least 6 monthly, more frequently when important information needs to be widely disseminated. Feedback from business owners/managers is that the newsletters are a great source of information and that they find them useful as an aid in training staff.

Whyalla Council continued its partnership with TAFE SA Regional to deliver food safety training courses to food handlers within Whyalla. Two sessions were offered during the reporting period and both were fully subsidised by Council meaning they were offered to food handlers at no charge. Participant feedback indicates that people find the sessions informative and useful to their operations.

Council's EHO conducted two food safety training session for a community group; the presentations were received well by participants who found the session informative. Participants stated that they enjoyed the interaction with the EHO which help to break down the barriers between the groups and the enforcement authority.

Activities Undertaken By Councils During Food Safety Week

Alexandrina Council

The theme for Food Safety Week was “Temperature Danger Zone”. Alexandrina Council endeavour to engage the community in most areas within our region with information sessions held in Strathalbyn Library and Goolwa Council Chambers. The information sessions were advertised prior to food safety week, and information sheets were developed by EHOs informing those in attendance of the importance of keeping hot foods hot and cold foods cold. The advertising material provided by SA Health was placed in bags along with further information provided by Alexandrina Council and was handed out at the sessions. The attendance was reasonable at both venues the target audience were mainly people operating home activities and food businesses.

Barossa Council

Council participated in Food Safety Week in collaboration with the Town of Gawler, District Council of Mallala and Light Regional Council by utilizing the main office foyer to distribute promotional material and by advertising in local newspapers and on the Council website.

City of Charles Sturt

National Food Safety Week was held on the 9-16 November 2014 with this year’s theme focusing on “Temperature Danger Zone”. To celebrate the event and raise awareness of the importance of keeping hot food hot and cold food cold, a stall was displayed at a Council run event on the 15 November 2014 for National Recycling Week.

Eastern Health Authority

Food Safety Week was held on 9 -16 November 2014. The theme this year was “Temperature danger zone” with a focus on keeping hot food hot and cold food cold. SA Health offered a range of promotional material free to EHA. In supporting the week, EHA visited local primary schools and discussed lunch box safety with children. The Food Safety Week initiative was well received by both staff and children. Many of them were unaware of risks involved in leaving potentially hazardous food in lunch boxes for long periods of time. The students were interactive by actively answering EHOs questions and seeking advice or clarification on how to ensure their food was safe to eat. The promotional material was distributed to students who showed interest by asking questions and participating

Flinders Ranges Council

The Council’s EHO took part in Food Safety Week and held food safety training sessions. As part of the Food Safety Week council provided free information sessions on the theme of understanding food safety requirements with an emphasis on the “Temperature Danger Zone”– Keeping Food Hot and Cold. A free goodies bag was given to attendees.

City of Marion

As part of food safety week the City of Marion set up a display stand at a local shopping centre to educate the community about food safety. Pamphlets and brochures were available along with merchandise that was provided by SA Health. The display was well received by the members of the public who were very interested in food safety issues.

City of Mitcham

Mitcham Council participated in Food Safety Week during November 2014. A food safety stall was set-up at a busy local supermarket and promotional material was provided to the

public. The food safety topic focussed on was “Temperature Danger Zone” and the public appreciated Council’s efforts in providing the information and materials.

District Council of Mallala

Food Safety Week which was initiated by SA Health was promoted throughout the period of 9 – 16 November 2014. Mallala Council collaborated with Gawler, Barossa and Light Councils for the event which was promoted through the local print media and Council’s website. There was an ongoing food safety video presentation and free sample bags. The event held in the Two Wells Library was well attended by members of the public and curious school children and will no doubt increase the local community’s awareness of food safety issues, especially in the domestic situation.

District Council of Mount Barker

Council once again held a stand at the local Woolworths shopping centre to promote Food Safety Week. Food safety information and promotional material was handed out to shoppers.

City of Mount Gambier

The City of Mount Gambier participated in Food Safety Week 2014 in our public Library. An information display was set up to highlight the theme “Temperature Danger Zone” and promotional giveaways from SA Health were provided throughout the week. Environmental health staff also attended the Toddler Time sessions in the library to teach young children about the importance of hand washing. An interactive session was held using a UV light and glowing gel so children could see how effectively they washed their hands.

City of Playford

To celebrate the 2014-2015 Australian Food Safety Week, EHOs held a booth at our largest shipping complex to chat with the community about purchasing cold and hot foods, keeping hot and cold food separate, using cooler bags and ice bricks when transporting cold food, checking fridges to ensure they are keeping food at or below 5^{0}C and not leaving food out on the bench top after a meal. The community response and participation was excellent and they received fact sheets, pizza cutters, salt and pepper shaker, silicon hot mats, sandwich containers, reusable shopping bags and other freebies with food safety messages.

City of West Torrens

The City of West Torrens participated in Food Safety Week with the Environmental Health Team setting up a stall in the Council library during Food Safety Week. EHOs manned a stall on numerous occasions, specifically coinciding with baby and toddler activity sessions. SA Health promotional merchandise was offered at the stalls.

Mid Murray Council

Food Safety Week was supported with a stall in the main street of Mannum promoting food safety awareness. Shopping bags, drink bottles and around 200 assorted trinkets each containing relevant food safety messages were given away to the general public.

Whyalla City Council

Food Safety Week November 2014 – Whyalla Council devised a Food Safety Week Newsletter that was sent to all food businesses highlighting the key message of ‘Temperature Danger Zone’, we also devised sandwich shaped flyer for the community and schools detailing basic food safety tips to ensure school and work lunches from home remain safe. Promotional materials received from SA Health were distributed to the community.

8. BIOSECURITY SA ACTIVITIES UNDER THE FOOD ACT 2001

Biosecurity SA is a division of the Department of Primary Industries and Regions SA (PIRSA)

The *Primary Produce (Food Safety Schemes) (Meat Industry) Regulations 2006* require retail butcher shops to be accredited with Primary Industries and Regions SA. Audits of accredited retail businesses are carried out by officers of Biosecurity SA.

Under the Memorandum of Understanding (MoU) with SA Health a number of Biosecurity SA officers have been appointed authorised officers under the *Food Act 2001* to look at other foods (besides meat) in retail butcher shops.

Throughout 2014-2015, 1122 audits were conducted on retail butchers shops, where a component of audits addressed other retail activities under the *Food Act 2001*.

During the audits at retail butcher shops 88 Corrective Action Requests (CARs) were issued which related to their food safety program, hygiene or construction and required follow up visits. No expiation notices were issued.

Food Safety Survey Report June 2015

Microbiological Survey of Chicken Meat

Author:
Cherylyn Stevens, Project Officer, SA Health

A Microbiological Survey to Assess the Presence of Salmonella and Campylobacter on Raw Chicken Meat for Retail Sale in South Australia.

Aims and scope of the survey

The purpose of this survey was to assess the presence of pathogenic *Salmonella* and the total count of *Campylobacter* on a meal-size portion of raw poultry meat being presented for sale in South Australia (SA).

This survey was intended as a snapshot survey to provide some indicative results to assess if any continuous improvement initiatives implemented from the results of a similar survey carried out in 2013 had made a difference in the primary production sector.

Supplier information was gathered and compared to establish if there were any significant differences in the frequency or distribution of *Salmonella* or *Campylobacter* on poultry meat to drive continuous improvement in the primary production sector.

This survey also aimed to attribute the risk to consumers of infection from cross contamination, based on the type of *Salmonella* or number of *Campylobacter* organisms likely to be present on poultry meat handled in a family kitchen through the use of risk assessment modelling.

Background to the survey

A high proportion of cases of foodborne illness reported to SA Health can be attributed to *Salmonella* and *Campylobacter* bacteria.

While other meats and much less commonly other foods carry these bacteria, raw chicken is an important source as most raw chicken will carry one or both of these bacteria. Previous surveys conducted by Food Safety and Nutrition Branch (FSNB), SA Health have provided data on the presence of *Salmonella* and *Campylobacter* in raw poultry. Cooking will destroy these bacteria but undercooking and cross-contamination from raw chicken (or its juices) to ready-to-eat foods can result in foodborne illness.

This survey was carried out as a joint survey between SA Health and Biosecurity SA. Food Safety Program, Biosecurity SA regulates primary production facilities such as poultry meat processors.

Standards

The *Food Act 2001* requires food businesses to sell food that is safe and suitable for human consumption.

Standard 4.2.2 of the Australia New Zealand Food Standards Code (the Code) sets out a number of food safety requirements for the primary production and processing of poultry meat for human consumption. Businesses that produce or process poultry meat must implement food safety schemes.

What foods were tested?

100 samples of fresh chicken meat were collected over an 8 week period from April to June 2015. The samples included approximately 500gm of skin-off breast and skin-off thigh fillets (49 breast and 51 thigh samples). These types of fillets were selected as these are commonly sold products and also require the maximum amount of handling and/or exposure to machinery.

Samples were purchased from retail outlets located across metropolitan Adelaide. At the time of purchase, the retailer was asked to identify the supplier of poultry meat being purchased. Samples were purchased either pre-packaged from display cabinets or packaged to order at service counters and placed under refrigeration for transportation to the laboratory.

Samples were packaged product directly supplied from 3 different companies and 4 processing plants (3 from SA and 1 from Victoria). These samples represent the majority of fresh poultry meat supplied into the SA market. These are plants which slaughter and debone poultry meat and are referred to as processors.

What did we test for?

The samples of poultry meat were tested for the presence of *Salmonella* and the counts of *Campylobacter* by SA Pathology's Food and Environmental Laboratory.

A surface rinse method was used to test for the presence of *Salmonella*. Where *Salmonella* was present, *Salmonella* colonies were sent for serotyping. Where serotyping results identified colonies as *Salmonella* Virchow (*S*.Virchow), phage typing was also performed.

Phage typing are tests that allow further classification of organisms. These test results are then able to be used to identify if any of the samples possess a known human pathogenic strain which could potentially grow to sufficient numbers in the kitchen environment and contaminate ready-to-eat food.

A surface rinse method was also used to estimate the total number of *Campylobacter* organisms on a sample, with a lower limit of detection of 100 organisms per sample. This allowed an analysis of risk to be carried out based on information regarding infective dose levels of *Campylobacter* and considering whether the levels found would be high enough to be easily transferred to ready-to-eat food (as *Campylobacter* is unable to multiply outside of the living animal).

Results

Salmonella

36 out of 100 samples (36%) were positive for *Salmonella.* From those 36 positive samples, 7 different *Salmonella* serotypes were isolated. These are summarised in Table I.

Table I – Summary of *Salmonella* results

Serotype	Breast meat	Thigh meat	Total
*S.*Sofia*	8	6	14
*S.*Virchow	3	7	10
*S.*Infantis	2	4	6
*S.*Mbandaka	1	1	2
*S.*Montevideo	2	0	2
*S.*Adelaide	1	0	1
*S.*Zanzibar	1	0	1
*S.*Typhimurium[#]	0	0	0

**S.*S.*Sofia is not considered to be pathogenic for humans.
[#]*S.*Typhimurium is the most commonly notified serotype in human notifications in SA (refer Table IV).

*S.*Typhimurium (*S.*Tm) is the most commonly notified serotype in human notifications acquired in SA. *S.*Tm was not isolated from any samples during this survey period. Other serotypes found in the samples of concern from a human health perspective were *S.*Virchow and *S.*Infantis at a level of 10% and 6% respectively.

*S.*Virchow serotypes can be further classified into phage types. Table II lists the phage type for *S.*Virchow serotypes detected.

Table II – Summary of phage types for *S.Virchow* serotypes

Sample type	Phage Type
Thigh	S.Virchow phage type 23
Breast	S.Virchow phage type 23
Thigh	S.Virchow phage type 25
Thigh	S.Virchow phage type 25
Thigh	S.Virchow phage type 25
Thigh	S.Virchow phage type 25
Thigh	S.Virchow phage type 25
Breast	S.Virchow phage type 25
Thigh	S.Virchow phage type 34
Breast	S.Virchow phage type 34

Campylobacter

The results for the whole samples for the counts of *Campylobacter* are listed in Table III.

Table III - Summary of results for *Campylobacter* counts

Ranges of counts	Range as $\log_{10}$	No. of samples			Risk*
		Total	Breast	Thigh	
< 100 – 1,000	< 2 – 3	49	34	15	Low
> 1,000 – 5,000	> 3 – 3.7	38	14	24	Moderate
> 5,000	> 3.7	13	1	12	High

*see discussion for details of risk assessment modelling

Discussion

This survey has provided some useful information regarding the risk from *Salmonella* and *Campylobacter* on raw poultry meat, presented for sale in South Australia during the survey period (April to June 2015).

Salmonella

The results were compared with human *Salmonella* notifications received in SA around the survey period. These included notifications received from 28 April to 16 June 2015. Figure 1 gives an overall look at the proportion of samples that were negative for *Salmonella* and for those that were positive for *Salmonella*, which ones had the same serotype and subtypes as human notifications reviewed.

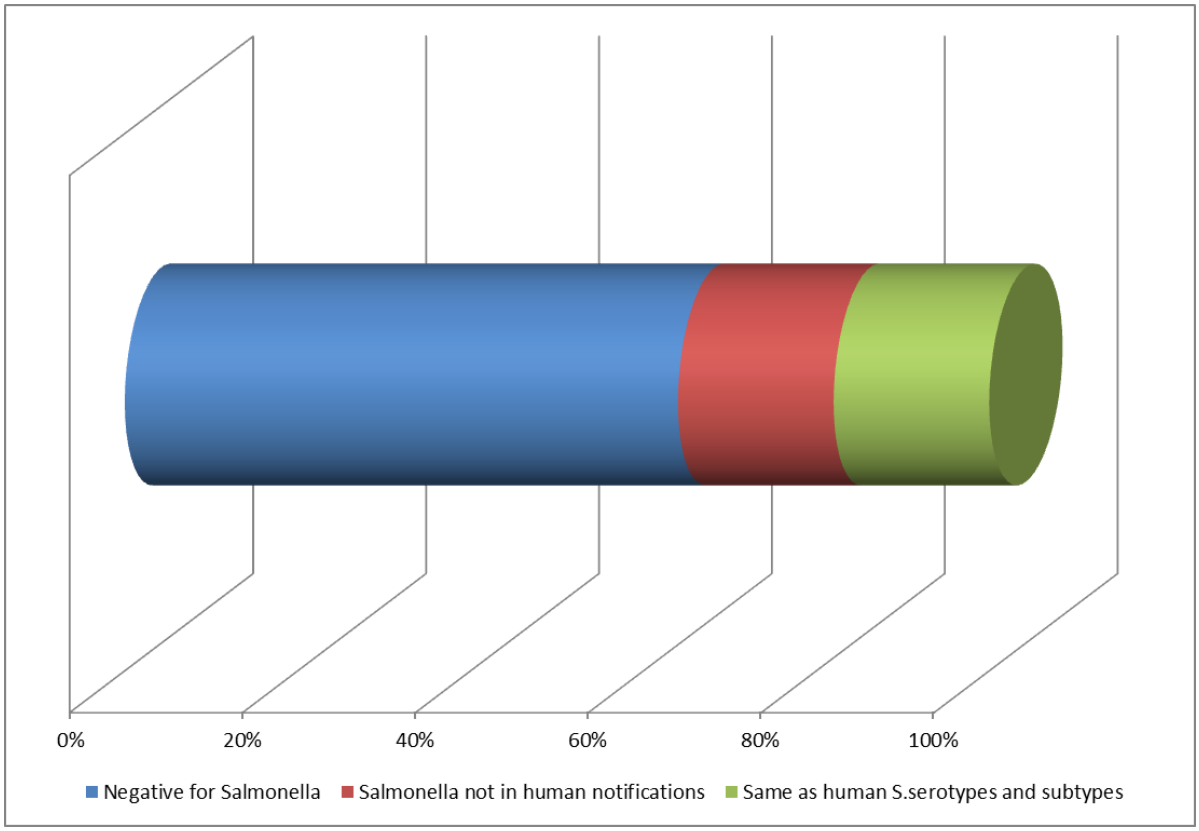

Figure 1. Proportion of samples that were negative, positive but not related to known human serotypes and positive that were related to known human serotypes and subtypes.

18 of the 100 sample total (18%) had *Salmonella* serotypes which appeared in human notifications during the period reviewed. No *S.*Tm serotypes were detected in the samples this survey period. This remains in line with the results from 2013 where any *S.*Tm isolates detected were from samples attributed to interstate suppliers.

These categories were associated with a total of 35 human cases or 16% (35 out of 220) of the total number of notifications in this period. Comparisons are detailed in Tables IV and V.

Table IV - Comparison of human notifications (28 April to 16 June 2015) in South Australia of locally acquired *Salmonella* serotypes and those found on the poultry meat samples during the sampling period.

***Salmonella* serotype**	**Number of notifications in humans**	**% of total notifications of *Salmonella* in humans**	**Number of isolates from chicken samples**
Typhimurium	127	57.7	0
Virchow	31	14.1	10
Enteritidis	13	5.9	0
subsp 1 ser 4512:i:-	5	2.3	0
Chester	4	1.8	0
Stanley	4	1.8	0
Mbandaka	3	1.4	2
Not further typed (no serotype)	4	1.8	(0)
Oranienburg	3	1.4	0
Weltevreden	3	1.4	0
Bovismorbificans	2	0.9	0
Hessarek	2	0.9	0
Muenchen	2	0.9	0
Newport	2	0.9	0
Paratyphi B var java	2	0.9	0
Potsdam	2	0.9	0
Corvallis	1	0.5	0
Derby	1	0.5	0
Havana	1	0.5	0
Infantis	1	0.5	6
Javiana	1	0.5	0
Kottbus	1	0.5	0
Orientalis	1	0.5	0
subsp 1 ser 310:r:-	1	0.5	0
subsp 1 ser 912:-:15	1	0.5	0
subsp 3b ser 48:z52:z	1	0.5	0
subsp 3b ser 53:z10:z35	1	0.5	0
Total	**220**	**100.0**	**18 from 100 samples**

Note: *Salmonella* serotypes Sofia, Montevideo, Adelaide and Zanzibar were detected in chicken meat samples however no human notifications were acquired in SA during the comparative period.

Table V - Comparison of human notifications (28 April to 16 June 2015) in South Australia of *Salmonella* Virchow phage types and those found on the poultry meat samples during the sampling period.

Phage type	Number of notifications in humans	% of total notifications of *Salmonella* Virchow in humans	Number of isolates from chicken samples
8	18	58.1	0
34	8	25.8	2
23	4	12.9	2
25	1	3.2	6
Total	**31**	**100.0**	**10 from 100 samples**

These results do not indicate that chicken was identified as the cause of the illnesses but rather the possible exposure risk and highlights the importance of careful handling and adequate cooking of poultry meat. The dataset also informs industry of the need to continue to eliminate these serotypes from their operations.

Campylobacter

Risk assessment modelling enabled the preparation of dose-response curves i.e. probability of human infection related to the dose ingested. These models suggest a 5-50% probability of infection with a dose of 100 organisms and a 50-80% probability of infection with a dose of 10,000 organisms (Heymann 2008)[1].

From this information the results were categorised into levels based on the perceived risk of portions of raw meat (approximately 500g) being a source of cross contamination to food handling equipment, food handling surfaces and any ready-to-eat foods in a kitchen environment. For counts below 1,000 colony forming units (CFU's – the total count of *Campylobacter* on the whole portion of meat), the risk was considered to be sufficiently low as it would be too difficult for a sufficient number of organisms to be transferred from the raw meat to a ready-to-eat food to cause food poisoning. On the other hand, counts over 5,000 CFU's could transfer a sufficient number of organisms to cause food poisoning and hence would be a likely source of cross contamination to ready-to-eat foods.

The levels of risk categories are summarised below in Table VI. 49% of the samples fell into the low risk category, 38% in the moderate risk category and 13% in the high risk category, with 12% in this category being thigh meat.

Table VI – Levels of risk categories

Ranges of counts	Range as $\log_{10}$	Risk*
<100 – 1,000	< 2 - 3	Low
1,000 – 5,000	3 - 3.7	Moderate
>5,000	> 3.7	High

The sample results for 2015 had a mean *Campylobacter* count of 3661 CFU's per portion of poultry meat (with the assumption that the counts which were actually less than 100 were taken as being 100). This is higher than the 2013 mean count of 1,364 CFU's but not

statistically significant. A previous retail survey completed in 2005 and 2006 (Pointon et al. 2008)[2] had a mean count of around 5000 CFU's per portion. Whilst the mean count for 2015 results is higher than 2013, it is lower than the survey carried out in 2005 and 2006. Because of the limited data available, it is difficult to establish a reason for the variation.

The counts were also compared in various ways to determine if any significant findings that could be used to inform industry for continuous improvement purposes.

The 2015 results for all fillet samples and for breast and thigh fillet samples separately were compared with respective results from 2013. As expected from the mean counts, there was a significant difference between the results for all fillets when 2015 results were compared with 2013 results when analyse statistically. This is presented on a log scale in Figure 2. The lower limit of detection is $\log_{10} 2$ which correlates to 100 organisms.

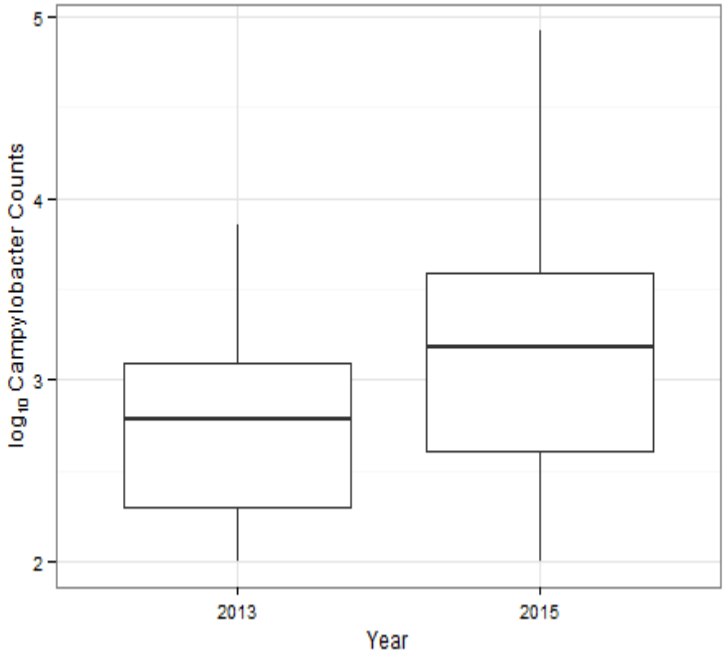

Figure 2. Graphical representation of the significant statistical difference in *Campylobacter* results between 2013 and 2015.

Comparisons between the 2013 and 2015 results for all fillet samples, breast fillet samples and thigh fillet samples were also made on an individual producer level to observe if there were any differences that could be provided as feedback to processors for continuous improvement purposes. Significant difference found was for thigh fillets from one particular producer (which in turn found a significant difference for all fillets from the producer) when the 2015 results were compared with the 2013 results. This is presented on a log scale in Figure 3.

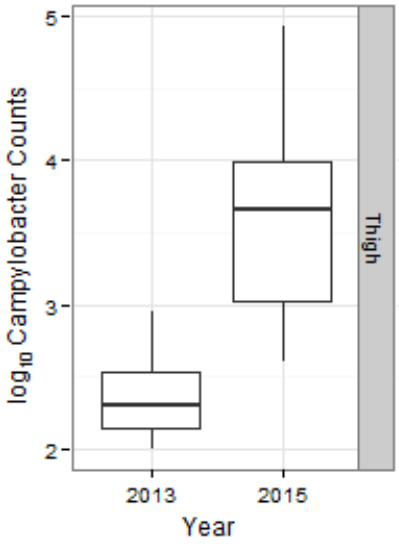

Figure 3. Graphical representation of the significant statistical difference in *Campylobacter* results between 2013 and 2015 for thigh fillets from one producer.

Conclusion

This survey has been a collaborative effort between SA Health and the Biosecurity SA (Food Safety Program) and provides a very good example of how pooling resources has more effectively informed the departments of the risks of raw retail poultry meat presented to the consumer and aided a regulator in targeting improvements in a food industry.

From the findings of this survey, recommendations can be made to poultry meat processors regarding potential for improved hygiene practices and cleaning and sanitising of equipment. It is important to keep in mind that although industry is making improvements, there is still a risk of *Salmonella* and *Campylobacter* being present on raw poultry meat so care needs to be taken when handling in the in commercial kitchens and in the home.

This was a snapshot survey and as such requires further data before being able to establish if there have been improvements in industry and reduced risk to consumers; however these results are important to indicate trends.

References

1. Heymann, D (ed.) 2008, *Control of Communicable Diseases Manual*, 19th edn, American Public Health Association.

>

2. Pointon, A, Sexton, M, Dowsett, P, Saputra, T, Kiermeier, A, Lorimer, M, Holds, G, Arnold, G, Davos, D, Combs, B, Fabiansson, S, Raven, G, McKenzie, H, Chapman, A & Sumner, J 2008, 'A Baseline Survey of the Microbiological Quality of Chicken Portions and Carcasses at Retail in Two Australian States (2005 to 2006)', *Journal of Food Protection*, vol. 71, no. 6, pp. 1123 – 1134.

Food Safety Survey Report June 2015

Labelling Compliance of Packaged Food

Author:
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A Survey to Monitor Labelling Compliance of Packaged Food

Aims and scope of the survey

The aim of the survey was to measure the level of compliance of packaged food labels against the Australia New Zealand Food Standards Code (the Code). Products sampled included baked goods, confectionary, sweet & savoury snacks, fruits & vegetables, beverages, various meats including fish, herbs & spices, pasta & noodles, rice, milk, oils and condiments.

From July 2014 through to June 2015, food samples were assessed against the labelling requirements outlined in the Code.

Background of the survey

Food Standards Australia and New Zealand (FSANZ) research shows that most consumers regularly read food labels to obtain information. In Australia, the information on a food label is governed by the Code. The aim of the Code is to ensure that foods are labelled with adequate information to allow consumers to make informed choices.

Standards

The Code requires packaged foods to contain the following ten key elements:

1. Name of Food
2. Name and Address of Supplier
3. Mandatory Advisory Statements and Declarations
4. Labelling of Ingredients
5. Date Marking of Food / Lot Identification
6. Directions for Use and Storage
7. Nutrition Information Panel
8. Legibility Requirements
9. Characterising Ingredients and Components of Food
10. Country of Origin Requirements

The code does not require certain foods to bear a label, these include:

- Food made and packaged on the premises from where it is sold (for example at a bakery).
- Food packaged in the presence of the customer (for example foods purchased from a delicatessen or take away food shop).
- Packaged whole or cut fresh fruit and vegetables (but not bean sprouts) where you can see the fruit or vegetables through the package.
- Food delivered packaged at the customer's request (for example home delivered pizza).
- Food sold at a fund raising event for charitable purposes like a school fete.
- Individual serve packages that are sold in a large package such as a 12 pack of corn chips, although the information has to be on the outer package.
- Also, foods in very small packages (less than 100cm^2) or foods with minimal nutrition such as herbs, spices, tea and coffee do not require nutrition information panels.

What foods were tested?

A total of one hundred and three (103) samples were collected. There was no specific category of food targeted but rather random samples were purchased from various retail outlets across metropolitan Adelaide.

What did we test for?

This survey involved the visual assessment of the information contained on a food label. The information was then assessed against the requirements of the Code for compliance.

Results

Table I. Summary of Labelling Compliance Rates – Sample Total: 103

Labelling Elements	Compliant	Non-Compliant	Not Applicable	% Compliant	%Non-Compliant
Name of Food	103	0	0	100%	0%
Lot Mark &/ OR Date Marking	103	0	0	100%	0%
Name & Address of Supplier, Importer or Manufacturer	98	5	0	**95%**	**5%**
Mandatory Advisory & Warning Info	72	0	31	100%	0%
Labelling of Ingredients	102	0	1	100%	0%
Direction for Use & Storage	101	0	2	100%	0%
Nutrition & Info Requirement	100	1	2	**99%**	**1%**
Legibility Requirement	103	0	0	100%	0%
Characterising Ingredients	46	0	57	100%	0%
Country of Origin	103	0	0	100%	0%

Figure 1. Summary of Labelling Compliance Rates

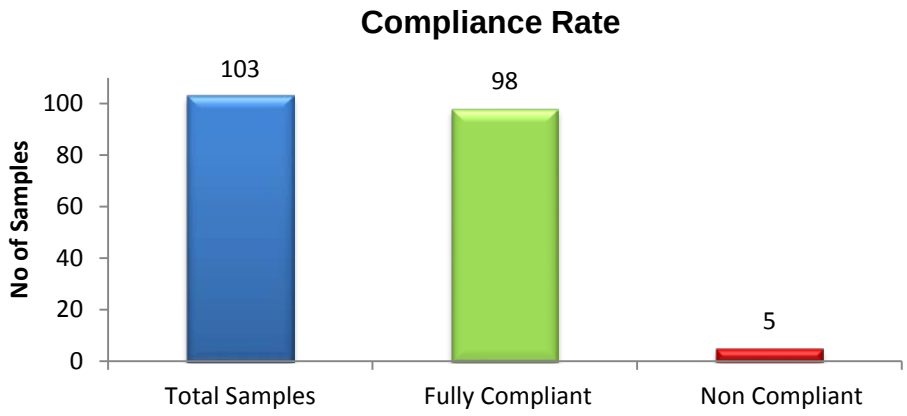
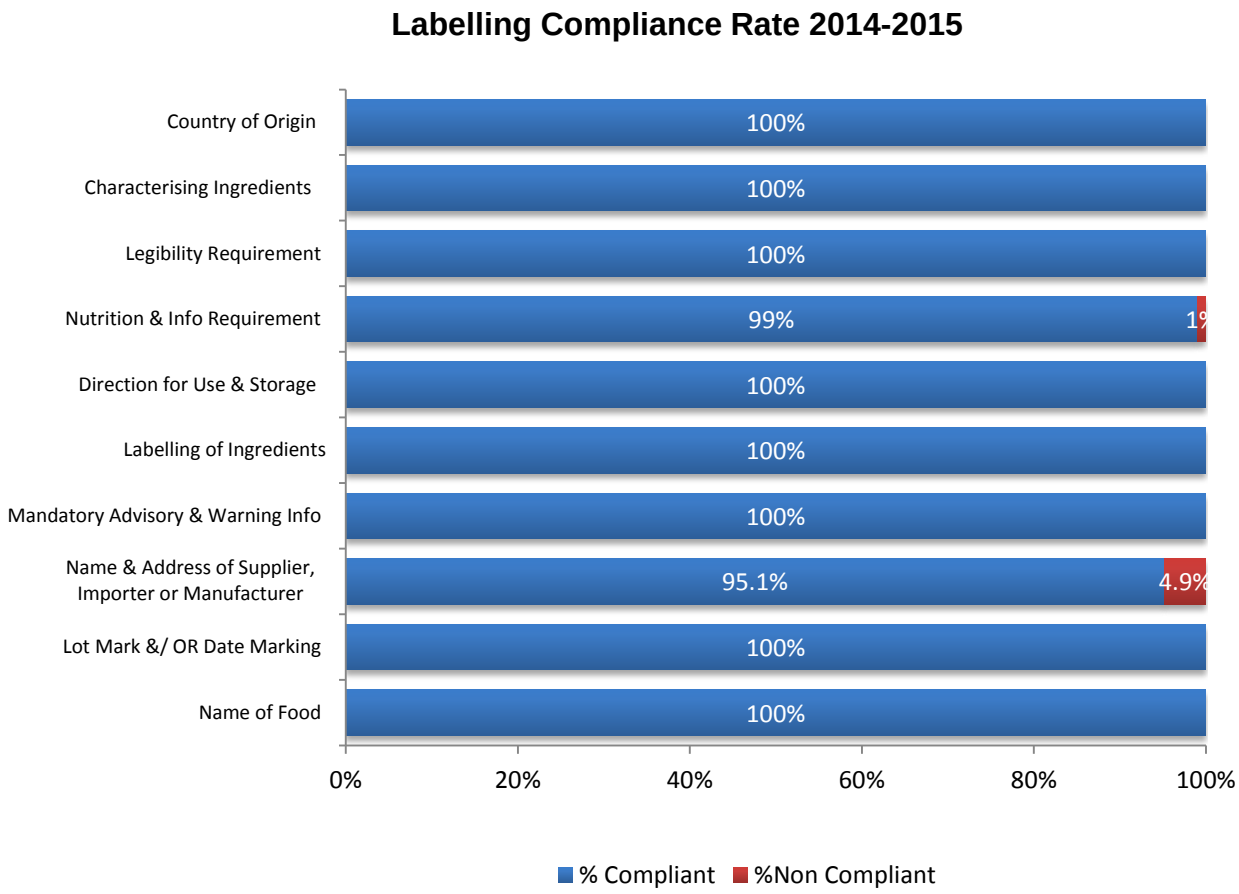


Figure 2. Percentage Compliance Rate

Figure 3. Compliance of Labelling Elements



Discussion of results

The results indicate that there is a relatively high level of compliance. Out of 103 food samples checked 98 (95.1%) were fully compliant with all the ten elements of the labelling, 5 samples (4.9%) were found to be noncompliant (See Table 1).

Among the five noncompliant samples, one sample failed to comply with the following two labelling elements

- Name and address of supplier on the product label
- Nutrition information panel(NIP) on product label

The other four samples failed to comply with correct declaration of name and address of supplier on product label.

All packaged food products do not require compliance with each of these 10 elements of labelling. In some products requirement to comply with certain elements of labelling do not apply either due to absence of that parameters of labelling or exemption provided in the Code. In this survey there were 31 samples identified where display of mandatory advisory and warning information was not required due to absence of any ingredient in the product which requires this information. Similarly 57 samples do not have characterizing ingredient so percentage labelling is not applicable. One sample did not require an ingredients list

because it was a single ingredient product and ingredient name was specified in the name of the product. Two samples did not required direction for use and storage and NIP on the label due to exemption provided in the Code.

It is worth mentioning that when assessing the food labels the following observations were considered non-compliant - label elements not in the prescribed format, labels in a language other than English or label elements missing entirely from the label.

Corrective action & follow up activities

All non-compliant labels were followed up with the responsible business either directly in-store or through an advisory letter which was then followed up at a later date to confirm that the required corrective actions had been completed. In cases where the business or its head office was located interstate, the matter was referred to the home jurisdiction for investigation.

Conclusion

In this survey, a total of 103 food products were sampled and assessed against key labelling requirements set out in the Code.

Overall, there is a high level of compliance and majority of food sampled in South Australia contained all the key information for consumers to make safe and informed choices. The main concern area identified was unavailability of correct supplier information on the product label which is the key for traceability in the event of a product recall.

There are many evolving food concepts and new imported products featuring in the market. Continuous monitoring is essential to monitor the integrity of information provided to ensure that consumers are given accurate information with regard to the safety and suitability of food presented for sale in South Australia. SA Health will continue to routinely monitor food labels.

Food Safety Survey Report June 2015

Microbiological Integrity of Soft Cheese

Author:
Jamie Woodward, Scientific Officer, SA Health

A Survey to Measure the Microbiological Integrity of Soft Cheese's Available for Retail Sale

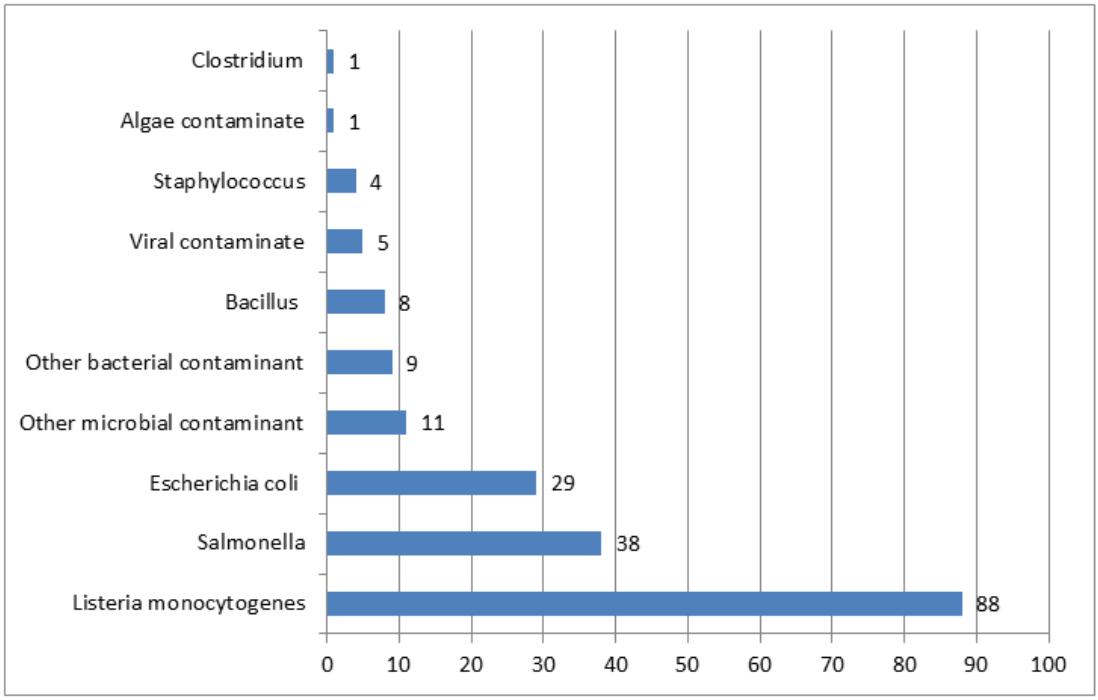
Aims & scope of the survey

The purpose of this survey was to assess the microbiological compliance of cheese products namely the absence of *Listeria monocytogenes* in cheese products available for retail sale in South Australia. Products sampled in 2014-2015 included soft and semi-soft cheese's which were purchased from supermarkets and retailers throughout South Australia

Background to the survey

SA Health Food Standards Surveillance continued pro-active surveillance of high-risk foods such as soft cheese.

Figure 1: Microorganisms associated with National microbial recalls from 1 January 2005 to 31 December 2014.



Since 2005 *Listeria monocytogenes* has been the most commonly associated microbial contaminant associated with food recalls. Of the 88 National food recalls for *Listeria monocytogenes*, 22 were associated with dairy produce.

For the 2013-2014 period, Food Standards Australia New Zealand (FSANZ) reported 8 food recalls due to *Listeria monocytogenes*, 4 of these were associated with soft cheeses.

For the 2014-2015 period in which the survey was conducted FSANZ reported 3 food recalls due to *Listeria monocytogenes*, 1 of these was associated with soft cheese (FSANZ)

Standards

Standard 1.6.1 specifies microbiological criteria for nominated foods or classes of foods. These criteria apply when food for sale is tested to determine its safety. The standard was recently amended to establish microbiological limits for the presence of *Listeria monocytogenes* based on the capability of a ready to eat food to support the growth. A nil tolerance is maintained for ready to eat foods that support the growth of *L. monocytogenes.* Ready to eat foods (RTE) that do not support the growth of *L. monocytogenes* are permitted a tolerance of 100 colony forming units per gram.

Figure 2: Food Standards Code: Standard 1.6.1 (as at February 2015) Schedule - Microbiological Limits in food*.

Food	Microbiological agent	The minimum number of sample units which must be examined from a lot of food as a specified	The maximum allowable number of defective sample units as specified	The acceptable microbiological level in a sample unit as specified	When exceeded in one or more samples would cause the lot to be rejected
Ready-to-eat food in which growth of *Listeria monocytogenes* can occur	*Listeria monocytogenes*	5	0	Not detected in 25g	20 / g

*abridged table

What foods were tested?

Soft cheeses are a ready to eat foods in which the growth of *Listeria monocytogenes* can occur. During the sampling period a total of 80 samples were collected aiming to capture a representation of these products available for retail sale in South Australia.

- Different types of soft and semi-soft cheese
- Different brands.
- Different production sites.
- Different production batches.

All original manufacturers' packaging was assessed against the Food Standards Code, Part 1.2 for Labelling compliance and no non-compliances were identified.

What did we test for?

All samples were sent to the SA Pathology Food and Environmental Laboratory in Adelaide for analysis. Samples were analysed initially for the presence/absence of *Listeria spp*. Where *Listeria spp* was detected, further testing was carried out to identify the species.

All cheese samples where purchased and directly stored in vehicle refrigerators at or below 5^{o}C and were stored under temperature control until delivery to SA Pathology in Adelaide.

Sample temperatures were recorded upon transfer to SA Pathology custody and processed. A representative portion of the sample is weighed (25gm) and placed into a stomacher bag with 225ml of *Listeria* enrichment broth. The bag is then placed in a 30^0C incubator for 24 hours to allow the bacteria to grow. After the 24 hours has elapsed 0.1ml is pipetted into a selective enrichment broth (Fraser Broth) and incubated for another 24 hours at 30^0C.

ELISA assay (Enzyme Linked Immune Assay) is performed next, if *Listeria* is present it will produce antigens, these antigens will attach to *Listeria* antibodies which have been placed in wells. The laboratory technician then looks for a *Listeria* antigen-antibody reaction. If the reaction is positive, the Fraser broth is streaked on a Listeria selective agar plate and incubated at 37^0C for 48 hours.

Typical *Listeria* growth appears brown on the agar plate and the laboratory will proceed to perform confirmatory tests to identify which of the *Listeria* species is present in the sample.

Results

A total of 80 soft and semi-soft cheese samples were obtained and submitted for analysis by SA Pathology in Adelaide. *Listeria monocytogenes* was not detected in any of the samples submitted for the 2014-2015 survey period.

Discussion of results

The survey aimed at capturing different brands and sizes of soft and semi soft cheese available for retail sale in South Australia.

The survey has not identified any level of *Listeria monocytogenes* contamination.

Follow–up activities

No follow ups were required as a result of this survey. While the incidence of *Listeria* monocytogenes is low the potential impact, particularly for immune compromised sectors of the public is severe. The scope of testing will be broadened to RTE to reflect amendment's to the standard.

Conclusion

All samples were measured against the recently amended Code, Standard 1.6.1 Microbiological Limits in Food. The overall microbiological quality of soft and semi-soft cheese at the point of sale in South Australia at the time of sampling was acceptable.

References

FSANZ – August 2015, Food Standards Code, Standard 1.6.1 Microbiological Limits in Food, http://www.foodstandards.gov.au/industry/foodrecalls/recalls/Pages/default.aspx?page=6, last accessed 3rd August 2015.

FSANZ – August 2015, Food Recall Statistics (Australia only), http://www.foodstandards.gov.au/industry/foodrecalls/recallstats/Pages/default.aspx, last accessed 3rd August 2015.

Food Safety Survey Report June 2015

Survival of *Salmonella* Typhimurium in commercially prepared aioli

Author:

Jamie Woodward, Scientific Officer, SA Health

Survival of *Salmonella* Typhimurium in Commercially Prepared Aioli

Aims and scope of survey

SA Health and its research partners sought the assistance of food businesses to participate in a project intended to provide guidance in the safe preparation of raw egg dressings in restaurants, cafes and catering venues in South Australia.

The objectives of the study were twofold. The first objective was to survey aioli samples prepared using raw eggs from food service establishments for the presence of *Salmonella spp*.

The second objective was to artificially inoculate these samples with *Salmonella* Typhimurium phage type 9 in order to investigate the potential for growth or the organism's survival over a period of time. The impact of acidity (pH), temperature and water activity was also to be considered. *S.* Typhimurium phage type 9 was selected as this phage type has been previously linked to raw egg-related product outbreaks within South Australia.

Background

At the time of this report, there has been an increase in Salmonellosis in South Australia. So far in 2015 there have been 861 cases, compared to 785 at the same time last year and 628 in 2013. These numbers are continuing to grow.

Investigations into the cases identified that many were related to preparation of dressings such as aioli which use raw eggs as ingredients and other lightly cooked foods such as omelettes and scrambled eggs.

During investigations it has been noted that a wide variety of practices are being used by food handlers to prepare, store and use these products. This has prompted SA Health to undertake research with the assistance of Biosecurity SA, Food Safety Program and the University of Adelaide to establish conditions that allow the survival or growth of pathogens, namely *Salmonella* and the implication any findings may have on preparation and handling practices in commercial kitchens and homes.

Methodology

Local Council assisted in identifying food businesses that prepare raw egg dressings, such as aioli.

Invitations to participate in the research project were provided to a number of food businesses throughout the Adelaide CBD, participation was voluntary. Each business was invited to provide samples of aioli using their standard recipe and method of preparation to reflect usual practice.

Food businesses were informed that basic information would be sort regarding their method of preparation of the products, to allow assessment of performance of a number of different formulations.

Collection and preparation of aioli samples

SA Health Food Standards Surveillance (Officers) collected samples from various food service establishments throughout Adelaide and surrounds. Samples provided were typically around 1 to 1.2 litres of aioli.

All samples were freshly prepared on the day of collection and in the presence of the Officers. Additionally background information such as formulation ratios, ingredients, suppliers, temperatures and acidity (pH) were also recorded.

Samples were collected in sterile containers using the food businesses utensils, with two lots of 100mls being provided to SA Pathology to verify that the samples were *Salmonella* free prior to experimental inoculation, and approximately one litre being provided to the University of Adelaide for the inoculation component of the research.

Samples were transported and stored under refrigerated conditions prior to commencement of the experiment.

SA Pathology conducted presence/absence testing using TECRA AOAC 998.09 method on all samples. Testing was initiated on the day of sample collection and tested again after 3 days storage at 8^{o}C.

The University of Adelaide also conducted a presence/absence test prior to inoculation to verify all samples were *Salmonella* free. Samples were then processed by filling six 250 mL sterile specimen containers with 50 g aliquots of the samples. Each container was allocated to a treatment group in preparation for inoculation and incubation. Treatment groups included control and inoculated groups at 4°C, 22°C and 37°C.

Incubation and enumeration

Samples which did not identify the presence for *Salmonella* were inoculated with *S.* Typhimurium at the dose rate of 10^{6} colony forming units per ml (cfu/mL).

Control and infected samples were incubated at three temperatures, 4°C, 22°C and 37°C, for 96 hours. The count of *Salmonella* in each sample was determined at 4, 8, 12, 24, 48, 72 and 96 hours post inoculation.

Salmonella colonies were then counted and expressed as cfu/ml. In samples where no survival of *Salmonella* was observed, samples were screened again using the *Salmonella* enrichment.

Measurement of pH and water activity

Water activity and pH of samples was observed throughout the experiment at 24 hour intervals from hour zero onwards and are summarised in the figures below.

Survival of *Salmonella* in samples submitted to SA Pathology

Salmonella spp. was not detected in any of the samples submitted to SA Pathology at day one and day three intervals.

Survival of *Salmonella* in samples submitted to University of Adelaide

S. Typhimurium phage type 9 was inoculated into aioli samples prepared in food service establishments.

- Out of eight samples bacterial survival was not recorded in three samples post inoculation (Figure 1; a), b) & h).
- In two of the remaining five samples bacteria survived better at 4°C than 22°C, bacteria did not survive at 37°C (Figure 1; d), e), f) & g).
- When results were combined for statistical analysis there was no significant difference in *Salmonella* survival at room temperature versus 4°C.
- Each sample was prepared individually and was unique.
- No bacterial growth was observed in any of the aioli samples under any experimental conditions above the original inoculation dose rate of 10^6 CFU/mL (Figure 1).

The following graphs demonstrate that acidity has a significant effect on survival. *S.* Typhimurium did not multiply in any samples tested, however the survival rate at 4°C, 22°C and 37°C in was greatest in the range of pH 4.1 to pH 5 and progressively least in samples with a pH <3.5.

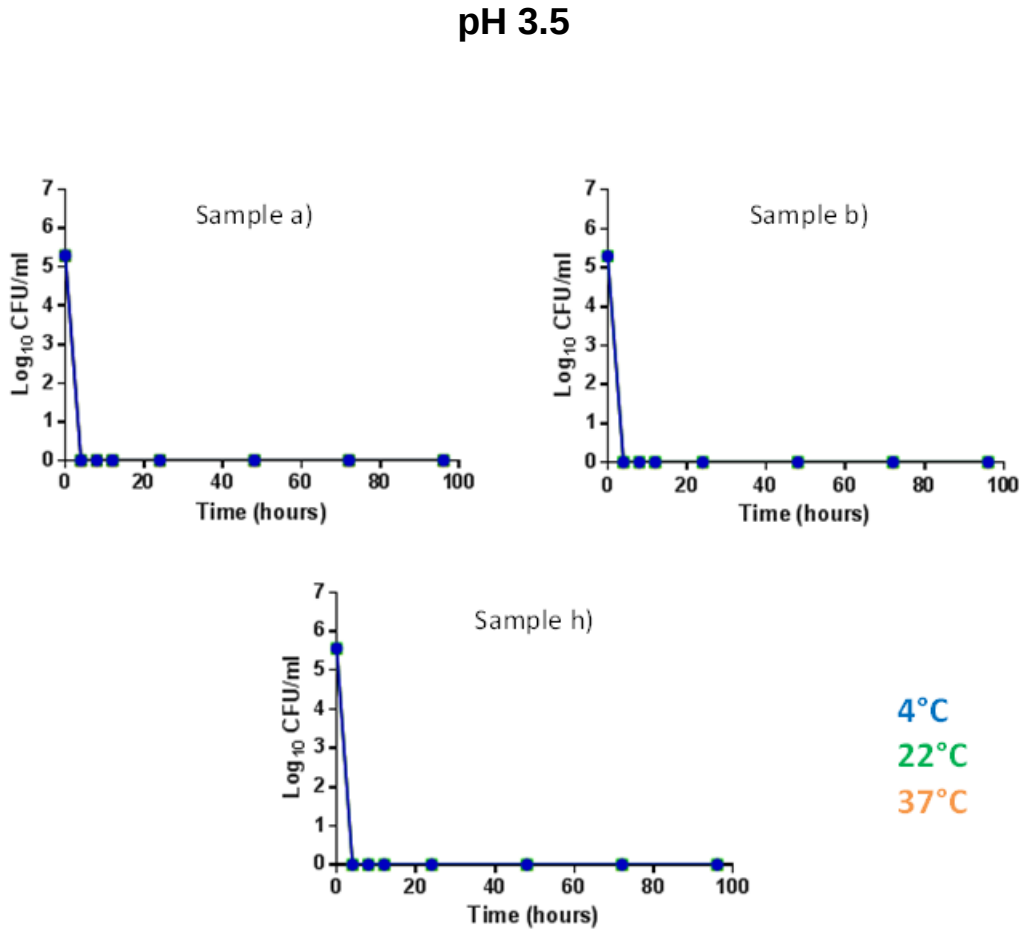


Figure 1: comparison of pH (<3.5) and bacterial survival at different temperatures

pH 3.6 – 3.8

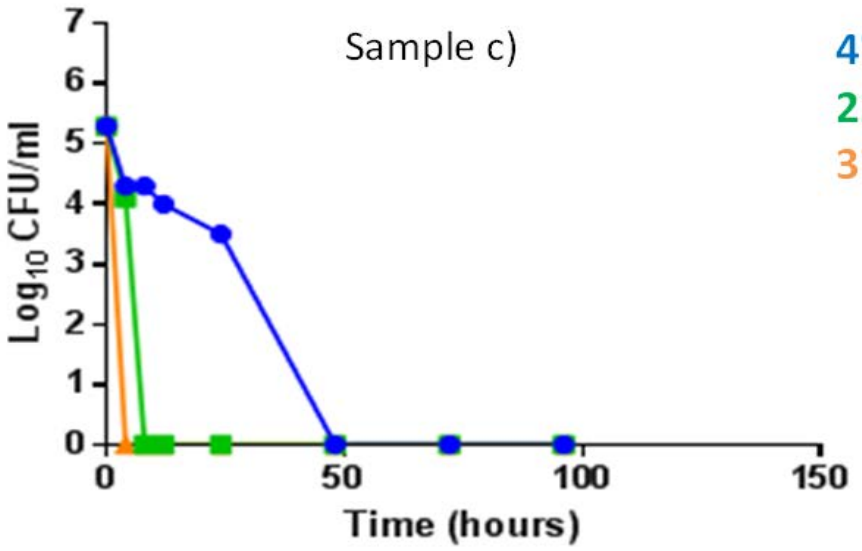


Figure 2: comparison of pH (range 3.6-3.8) and bacterial survival at different temperatures.

pH 4.1 – 5.0

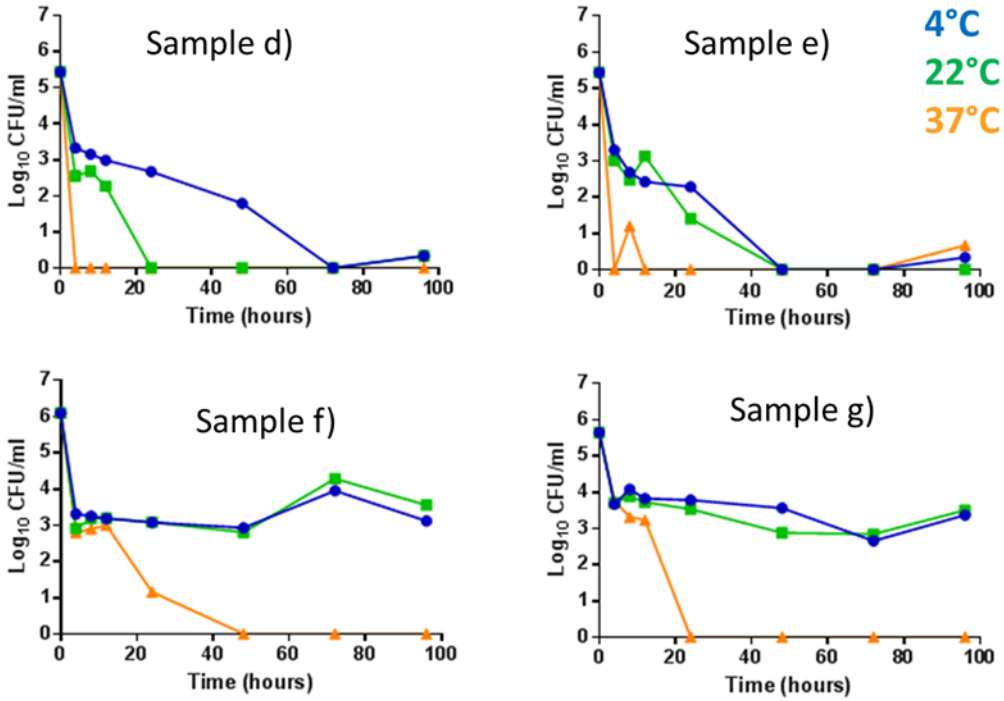
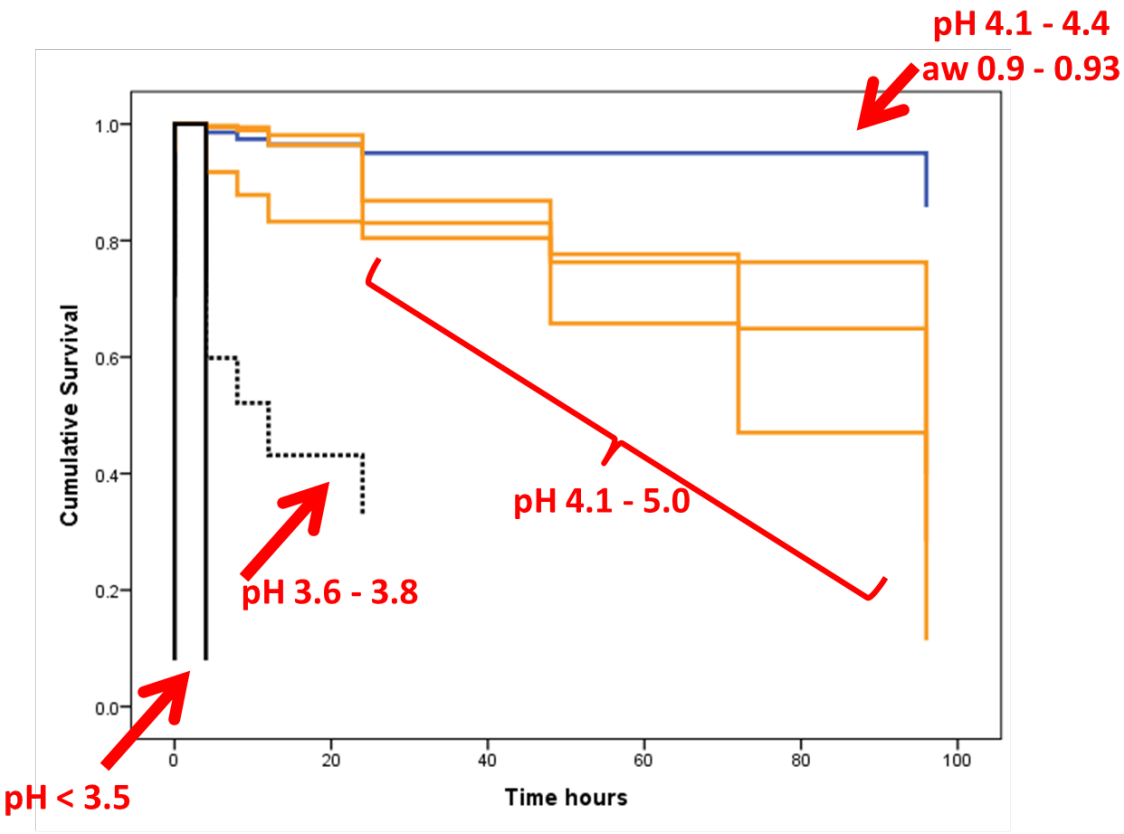


Figure 3: comparison of pH (range 4.1-5.0) and bacterial survival at different temperatures.

Figure 4: Sample-wise survival of *S.* Typhimurium within aioli across all temperatures from 0 to 96 hours.



Results were assessed to determine if there was an association of pH, water activity, or temperature with *Salmonella* survival.

- Cumulative bacterial survival indicated that pH and water activity were significantly correlated with bacterial survival, and a significant interaction between pH and water activity was observed.
- Overall temperature was not significantly correlated with survival. Samples incubated at 37°C, however, exhibited a significantly higher probability of bacterial death.

Discussion of results

All samples sent to SA Pathology and Adelaide University underwent testing to determine if *Salmonella spp* was present in the initial sample provided by the food establishment, *Salmonella* was not detected in any of the samples prior to inoculation at either laboratory.

In addition to tests conducted on day one by SA Pathology, an additional test was conducted three days after sample collection to determine if *Salmonella* may have been present at numbers too low to detect at day one. Remaining samples were stored at 8^0C for 3 days to determine if *Salmonella* could survive or multiply to detectable levels under these conditions. *Salmonella spp* was not detected in any of these samples in this group, suggesting that cross-contamination did not occur during preparation.

Acidity appears to be the most important factor in safe preparation of aioli; however increased acidity and resulting tartness may be resisted by chefs and consumers. Chefs reportedly replace some or all of the vinegar content with lemon juice. The antimicrobial activity of lemon juice is less than that of vinegar. As a result further testing would be required to establish the potential for survival or growth of *Salmonella* in this medium. It is significant that the only sample below pH 4 that displayed any survival of *Salmonella* after zero hours did use lemon juice, suggesting that lemon juice on its own is less effective in controlling *Salmonella* survival than a combination of vinegar/lemon juice or vinegar alone.

Sample e) with pH 3.4 or less did not support bacterial survival over the course of the experiment. Aioli preparations with pH 3.6 to 3.8 survived for >20 hrs while pH 4.1 to 5.0 survived for the course of the experiment. Water activity was found to be lower in sample e). Water activity for samples was similar and ranged between 0.92 and 0.98.

During this study, it is important to note that inoculated samples with strains of *S*. Typhimurium did not multiply over time in any of the samples. *S*. Typhimurium reportedly has the ability to develop into a Viable But Non Culturable (VBNC) state after exposure to stress, e.g. low temperatures, low water activity and nutrient limiting conditions for prolonged periods of time (Gupte et al., 2003). Lack of detection after negative plating during this study could be attributed to a VBNC state of *S.* Typhimurium, however further investigation is necessary.

Follow up activities

Each business has been given feedback on how their sample performed and has been provided with a certificate of analysis from SA Pathology.

All sensitive information gathered (business name and formulations) is treated as confidential and is de-identified when presented as summaries of results and recommendations.

Conclusions

Little or no contamination of the product appeared to occur prior to inoculation as all samples tested, did not detect *Salmonella* in the original samples. Samples were subjected to minor temperature abuse (three days & 8^{o}C) and *Salmonella* was not detected in any of these samples suggesting that *Salmonella* survival may be influenced more by acidity (pH) than temperature. The potential for non-detection of *Salmonella* as a result of VBNC was not considered during this survey.

After eight hours post-inoculation *Salmonella* survival decreased rapidly at 37°C. There was no significant difference between survival at 4°C and room temperature. Survival was also reduced in samples with increased acidity; aioli below pH 3.5 exhibited the fastest decline of bacteria. Water activity did not vary significantly over time. However storing aioli samples at ambient temperature would be inappropriate as spoilage or other organisms can make the product unacceptable.

Acidity appears to be the most significant factor in *Salmonella* survival with low acidity (pH<4) increasing speed of die off. The type of acid used is also important as citric acid appeared less effective than vinegar at a similar pH.

Although this study has provided some important insights into appropriate preparation and storage of aioli products, there are a number of limitations in the experimental design. The

aioli samples were gathered from outside sources and the composition of the samples varied greatly from one establishment to another.

It is intended to conduct a future study where aioli samples will be prepared using a standard base recipe. This will allow for adjustment of specific variables such as type of acid used, pH and water activity. Variables will then be assessed individually regarding their impacts on *Salmonella* survival in a controlled environment. This will hopefully lead to the creation of clear guidelines regarding the safest possible preparation and storage of aioli products for the benefit of the consumer.

Observation of the VBNC phenomenon may mean that *S.* Typhimurium was still present in samples but could not be detected by the test method used. It is possible that placing *Salmonella* under stress for example by acidification or refrigeration may result in survival of *Salmonella* in the VBNC state. This may have significant implications for routine microbiological testing and for detections of *Salmonella* in food samples and environmental swabs during outbreak investigations. Further investigation of the properties and implications of the VBNC state is required.

References

Gupte, A.R., De Rezende, C.L., Joseph, S.W., 2003. Induction and resuscitation of viable but nonculturable *Salmonella* enterica serovar Typhimurium DT104. Applied and environmental microbiology 69, 6669-6675.

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Appendix V

Food Safety Survey Report June 2015

Survey of Allergen Free Claims

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A Survey to Assess the Accuracy of Specific Allergen Free Claims Made in Relation to Foods for Retail Sale in South Australia

Aims and scope of the survey

The purpose of this survey was to assess the accuracy of specific allergen free claims made on foods at the retail level. It was also to check compliance against the Code at the point of sale.

Background to the survey

Consumers with food allergies or intolerances rely on food businesses to correctly advise whether a particular allergen is present in food or not.

43% of food recalls in 2013-2014 were due to labelling issues concerning allergens – most were related to undeclared allergens and one was connected to a dairy free claim, however the product had dairy in it.

There appears to be a recent consumer trend on lifestyle diets such as gluten free diets or dairy free foods for those on vegan diets. It may also be possible that more businesses are selling these products.

Previous compliance surveys of gluten free labelling had been carried out in 2005 and 2009 to investigate the accuracy of manufacturer's gluten free claims. The compliance rate for both surveys was 98%.

Standards

The Food Act 2001 requires food businesses to sell food that is safe and suitable for human consumption.

What foods were tested?

In this survey a total of 50 samples were collected from supermarkets, specialised retail stores (e.g. organic or gluten free stores), markets, bakeries and cafes. Foods selected were labelled with free claims and were a combination of both locally produced and imported products. Table I below shows the spread of samples across food categories.

Table I – Samples collected categorised by food categories.

Food Category	Number of Samples
Bakery	21
Cereal/Grain/Premix	6
Condiment	5
Dairy	5
Pasta	4
Savoury Snack	4
Convenience Meal	3
Bread	1
Noodles	1

What did we test for?

Samples were analysed for the presence of the substance which the food claimed to be free from. Where samples claimed to be free from a number of substances, samples were analysed for presence of each substance.

Results

From the 50 samples collected, 47 samples did not detect the substance which the food claimed to be free from. The range of free claims made on samples included gluten free (48), lactose free (3), egg free (6), soy free (2) and peanut free (2). Ten of the samples collected had more than one free claim on them.

Discussion

The compliance rate for this survey was 94%. Of the 50 samples, three samples did not comply due to the detection of gluten in trace amounts indicating cross-contamination rather than direct contamination. The ingredients for these were gluten free and produced by the same manufacturer.

Follow-up activities

The three samples that detected gluten were biscuit products made in South Australia. A follow-up with the manufacturer was conducted. The follow-up revealed that the manufacturer produces the product from gluten free ingredients however products with gluten were also produced in the same facility. There was not a process in place that separated the two activities to allow effective prevention of cross-contamination. The proprietor was informed to consider alternative procedures to achieve compliance. Due to the first non-compliant sample, the same product, along with similar gluten free products, was tested again. On the second occasion gluten was not detected in the initial product. Gluten was detected in trace amounts in samples of another product again indicating cross contamination rather than direct contamination. The manufacturer advised that changes to the label were made for the affected products, this was verified. As the products were of low volume and intended to be consumed soon after purchase, a recall was not deemed necessary.

Conclusion

There was a compliance rate of 94% of free claims made on foods at the retail level. Three samples by the same manufacturer detected the presence of gluten in trace amounts. The manufacturer has been advised and informed that further sampling could occur for non-compliance the Food Standards Code.