

The Menu

5th Edition - Summer 2020

Welcome to the fifth edition of The Menu. A newsletter produced by Baw Baw Shire Council to keep you up to date with issues relevant to food safety and best practice contemporary food trading.

Have a question? We're here to help.

Contact our Public Health team on 5624 2411

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Reminder: Food Act registrations are due before 31 December 2019

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Baw Baw Shire Inspection Policy

In this issue we openly share our food premises Inspection Policy and hope it can be used in your food business operations.

Our compliance assessments describe your food premises in our database and build a compliance history. We must report these observations quarterly to the State Government, Food Safety Victoria.

All of our inspections are guided by Australian Standards; specifically, the Food Standards Code (http://www.foodstandards.gov.au/ code/Pages/default.aspx). Every proprietor is encouraged to read this Code.

When an Inspecting Officer interprets the Code, this requires guidance, to ensure a consistent approach to the meanings of categories occurs. Such categories include 'unacceptable' (and likely to cop a fine), 'poor to average' and 'excellent/best practice'.

Continued overleaf...







Inspection Policy continued...

When we complete a food premise inspection, we consider your compliance against the Code as well as against the attached Inspection Policy. We keep our inspection records in a database software program called 'Health Manager', that over 70% of Victorian Councils utilise. This allows food businesses to be placed into the following compliance categories for the purpose of describing a final compliance score.

This compliance score and category gets reported to State Government.

These categories are:

- **Compliant** (fully compliant) 85-100
- Complaint (minor non-compliance) 65–84

• Non-compliant (major non-compliance) 50-64

Critically non-compliant 0-50

These compliance levels are assessed against inspection guidance material and result from:

- All minor non-compliance will result in the Health Manager software deducting 1 point.
- All **MAJOR non-compliance** observations 5 points deducted.
- All Critical non-compliance observations 10 points deducted.

Hints to obtaining a better score.

Clear and available access to your hand wash basin

If you're hand wash area is blocked, this implies that hands are not being washed and this is a major noncompliance.

Five points are deducted.

Have a food safety program in place

Should something occur at your premises and you have no platform of evidence to show you received, stored, prepared, displayed and sold safe food, this is a critical non-compliance.

Ten points are deducted, plus a possible fine.

Keep food in your cool room covered

We often see food stored uncovered, along with unclean refrigeration fan motors that blow bacteria straight onto food. This is considered a major noncompliance.

Five points deducted.

Should any business want to discuss our Inspection Policy, please contact Geoff Fraser, Coordinator Public Health on 5624 2452.



What a Waste!

624 tonnes of food waste each year. (in just 51 food businesses)

A significant Warragul food waste survey has just been completed through a joint project involving Sustainability Victoria, Gippsland Climate Change Network and Snowy River Innovation. The survey developed an effective data collection methodology applicable to food and hospitality businesses and accurately captured the volume of food waste generated by the food industry sector in Warragul.

The research focused on 150 businesses, of which 50 were marked as high priority food waste generators. The survey involved a brief in-person interview, then a photographic assessment of all daily waste generated. It was then

Total

converted to observed litres and kilograms of food waste, using a density conversion table and categorised waste and the business type where the food waste was produced.

A total of 64 Warragul businesses were approached and 51 interviews and assessments were conducted. Of the businesses surveyed, it was estimated that a total of 624,267 kilograms (624 tonnes) of food waste was produced per annum. This research indicated a significant proportion of food waste could be diverted from landfill and alternatively supplied to a composter or dedicated donations could be made to charity.

Below is a breakdown of the amount of waste by each food business.

A wealth of data was gathered to inform the interpretation of such figures and suggested that many Warragul businesses in the food and hospitality sector used sustainable food waste disposal. Many businesses donated the leftover food to charity food banks and others utilised composting, either as an educational method for children at several childcare centres, or as the main waste treatment method for their small business.

FOOD Business Type	No. of establishments surveyed	Kg wasted food / Week	Kg wasted food / Week per establishment
Accommodation	1	33	33
Bakery	3	528	176
Cafés or Restaurants	25	6,354	254
Child Care Centre	3	133	44
Church	1	21	21
Community Group - Club	3	593	198
Nursing Home/Aged Care Facility	3	236	79
School Canteens or Take Aways	8	1,024	128
Supermarket	4	3,085	771
	Businesses Surveyed	Kg wasted food / Week	Kg wasted food / Year





Message distortion – cleaning your message filter

Our health team visit and chat with many food business operators every day, to ensure food safety and food process compliance information is well known.

Sometimes there may be a little confusion about the suggestions and recommendations, our Officers provide to businesses. For example, we suggest things to improve your business operations such as; maybe invest in a new bench, maybe paint the ceiling, maybe install a new floor.

Just to clarify. No authorised Officer can make you do anything. We simply recommend improvements that move you toward best practice compliance (refer to our inspecting guidance material). Here are two examples of the differences in' what was said' and 'what was heard':

You may have heard:

"you will not succeed at this location".

What was said:

"the last two food businesses at this location were not so successful".

The message:

Plan something a little different to the previous two businesses. We are committed to helping clarify a direction or any requirement that is suggested, and work with you for better food safety.

You may have heard:

"you must buy a new stainlesssteel kitchen bench immediately".

What was said:

"continuing to manufacture on that old bench poses a food safety risk, the bench is harbouring bacteria and is non-compliant with the Food Standards Code".

The message:

Whilst the old bench may be fixable, a new bench is better so why bother with the old one?

What is a PIE and what's actually in it?

Australians love eating pies and on average, each Aussie consumes 12 meat pies a year - that's 270 million pies annually. Across the ditch, our New Zealand neighbours love their pies too with the average Kiwi eating 15 meat pies, which is 66 million a year. So, it's no wonder that Food Standards Australia New Zealand (FSANZ) has many visitors to their website seeking information about meat pies.

Much of the interest in meat pies is generally about the age-old question: - how much meat has to be in a pie and what kind of meat can be used?

The Food Standards Code stipulates that a meat pie must contain a minimum of 25 per cent of meat flesh.

According to the Code, meat flesh means:

'The skeletal muscle of the carcass of any buffalo, camel, cattle, deer, goat, hare, pig, poultry, rabbit or sheep, slaughtered other than in a wild state (i.e. not bush meat), plus any attached animal rind, fat, connective tissue, nerve, blood and blood vessels.'

But what makes up the rest of the pie? Well, most of the rest of the ingredients will be pastry, gravy and vegetable protein but, to ensure everyone knows what's in your pie, FSANZ requires pies to have the ingredients listed on the label.



How much meat has to be in a pie and what kind of meat can be used?



Let's Talk: Jimmy D's Diner – Yarragon

Remember food diners from the fifties and sixties? Well thanks to the Hentschel family the diner legend still lives on in Yarragon. A whole new generation gets to enjoy 'old skool' (sic) culture with the most delicious contemporary twist of menu.

We caught up with Kathy, Barry, Nikki and Xavier Hentschel at their new premises in Yarragon at 83 Princes Highway.

Hi guys and gals – WOW! This is a cool place you have here. Give me the background to the inspiration.

Kathy – Thanks! - we love hot rods and cars. Barry's had cars since he was sixteen. We met 33 years ago and have collected 50's memorabilia that whole time. We love it. It was always a dream to have a replica diner. Guess we're now living the dream. We are a close family and we thought if we all got involved, we could 'make it happen'. I can also run my glass studio next door.

As you know, I've been really impressed with the kitchen layout and structure of your kitchen. Can you comment on the design, flow and quality of fittings?

Barry - We wanted our kitchen to be a place where staff wanted to work. We did a lot of research on fixtures, fittings and products before-hand. We always desired the clean lines of modern industrial, the polished concreted and sealed walls, that was all planned at the start. The customer service area is specially crafted (locally) with that stainless-steel edge to replicate the 50's diner whilst meeting all of your food standards requirements. We appreciated working with your public health staff at every stage of fitting out the premises.

What is your current staffing structure and how do you cope if a bus load of tourists walk in?

Nikki – We found that people are pretty patient, and they understand that multiple customers walking in, places demands on getting menu items out. However, we generally have been operating with an extra staff member. We've been coping pretty well.

What hard and fast lessens have you learnt on opening?

We established a business plan before opening and central to that plan was to make every customer feel important. We have learnt that not everyone is easy to please. But thankfully – the best thing we've learnt is that there's a lot of car fans and 50's/60's fans out there.

Have you got any sense yet of the make-up of your customers; what would you say is the local versus tourist, versus 'out of towner' mix?

Kathy – a bit of everything really. A lot of locals and the surrounding area are asking if we can stay open into the night longer and we will be doing that as the days get warmer. We're also going to offer night time dancing lessons.

We are also tying into events at the Holden Museum; the other day when they had their Route 69 event, we offered Torana and Pontiac burgers.

I have to admit to getting stuck into one of your burgers a few weeks ago. I made the mistake of having a milkshake first – and ended up hardly able to finish the burger. It certainly was a mega meal. What sort of quality feedback are you receiving?

Nikki – we're getting great feedback. We're constantly communicating that we offer fresh local produce sourced from the surrounding areas and it is very exciting for Yarragon to have this amount of food offering diversity. We believe we are offering something a little different that showcases what is available in Yarragon.

Okay, here's your chance to talk up Yarragon as a Foodie town – what's your message?

Kathy - Yarragon and the Baw Baw region thrive on the different and eclectic collection of food and art, we are extremely proud of Yarragon and Baw Baw and wish to push it and promote the destination.

This diner has a great vibe and I think Yarragon also has a great vibe. Sort of like the vibe of a well-tuned idling 455 V8 – laughs Kathy "We met 33 years ago and have collected 50's memorabilia that whole time. We love it. It was always a dream to have a replica diner. Guess we're now living the dream."





The essential daily cuppa, are they really free of dairy product?

In early September, the public health team went for a coffee; well....in a different way. Fourteen soy lattes were collected as part of our annual food sampling program.

The 14 different premises were tested to see if the soy lattes were actually free from dairy and lactose contamination. Each of these chemical tests for allergens costs \$316 to perform.

We received quite surprising results.

The good news is that all 14 samples came back lactose free. However, 10 of the samples returned a positive result for dairy contamination.

The presence of dairy proteins within the lattes are due to cross contamination from dairy milk and can present a real problem to customers who have a dairy allergy in comparison to those who are lactose intolerant.

Café and restaurant owners have demonstrated allergen awareness and ensuring that there are different jugs used for speciality milks, which is a wonderful first step. Yet, further focus and effort is required to the steaming wands, as well as how jugs are being cleaned.

Jugs should be washed and sanitised between use. Even with cleaning, specialty milks should be allocated their own jug. Steaming wands should be cleaned after each use as well as additional cleaning before and after specialty milks.



Did you know?

- Usually coffee gets a lot of flak. It can dehydrate you, it can encourage you to drink more alcohol and it can potentially lead you to consume more cigarettes, but it also happens to be the biggest source of antioxidants in an average diet. This means that early morning cuppa is, in fact, helping you fight free radicals.
- If you need to speed up the ripening process of an avocado, put a banana or apple around it. Fruits such as these give off ethylene gas which creates the effect.
- One of the most hydrating foods to eat is cucumber, made up of 96% water. It contains electrolytes, which are minerals that include calcium, chloride, magnesium, phosphate, potassium, and sodium, which helps your body restore what it may have lost through dehydration. It really is the best hangover cure, ever.
- The first product to use bar codes was Wrigleys chewing gum, in 1974 in the States it was a 10 pack of Juicy Fruit.



Food business opportunities

How is your food business travelling? Could it travel? Just a few short blocks to make some extra money?

There is a lot of development activity around Warragul and Drouin. We suggest "don't let those tradies get away". Have you considered:

- Dropping off your menu/your food offerings to work sites
- Sending someone from your business down to take lunch orders
- Handing out an incentive/ voucher – 'free drink – with XXX' that will pull people to your business

• Make sure your menus are listed online to make ordering easier

Also - Register your business on the Visit Baw Baw website. Registration is free and easy to do, simply go to https://www.visitbawbaw.com.au/ register-your-business/

Set up a business profile. You can also list any specials or promotions that you've got on offer. Right now, this sector is spending, don't miss out on your share.



Public Health team Procedure 1 – Food safety inspections – Professional reference.

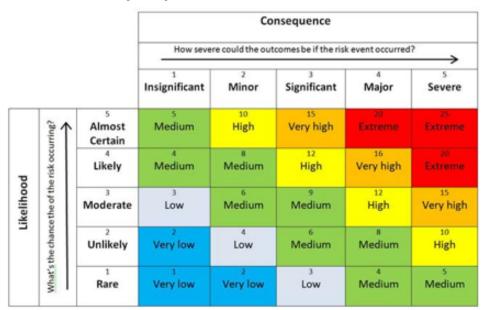
Professional quick reference – food premises inspection guide. This is not a food premises scoring card but can be used to guide Inspecting Officers toward decisions in-field, such as when to seize food, issue notices or close a premise. This guide is for consistency in approach to compliance. However, does not exceed an Officer's professional discretion or need for Officers to liaise with the Coordinator or Manager of Community Safety prior to significant enforcement actions.

Essential – All application of compliance legislation, codes, advice and education to the food sector by way of professional (Officer) decisions must align to reasonable appreciation of risk management, risk to end consumers and the values of Baw Baw Shire Council.

Risk Management – likelihood of an adverse event combined with the potential impact of that event.

Risk to end consumers – Consider the observed non-compliance in the context of the remaining processes within the food chain up until human consumption. For example, if the non-compliance had been witnessed as poor food handling and the operator explains the food is for a Melbourne based festival over the next 3 days; consider the likelihood that the observed noncompliance will result in significantly compromised food quality by the time it reaches consumers.

An Officer must have reasonable confidence in a business and their food operations. How they



handle, process and store foods will translate to the quality of food products available to the consumer. If operations are observed with unacceptable practices by way of not being registered under the Food Act, excessive food volumes, food exposed to risks or handling food in an unacceptable manner, consumers are at risk.

Unacceptable – Dictionary definition. (Any reasonable person can communicate the non-compliance). Risks are assumed very high – extreme. Unacceptable will trigger "Critical' in terms of observation and inspection data entry on Council record keeping systems.

Poor to Average – Limited effort is being made to give food safety assurances. Risks are considered medium to high. Good to Excellent – Dictionary definitions – Industry best practice, leading examples, full reassurance of food safety. Low to minimal risks.

Observed- Officer has seen or photographed the non-compliance.

Compromised food quality- A

detrimental process or event has occurred in the food chain that impacts food integrity and questions if the food should remain in the food chain. The food has been exposed to a chemical, smoke, an infected food handler or temperature abuse and should not remain in the food chain.

Seizure – Focus on the food that is non-compliant. Remove from premise if possible, otherwise take actions to isolate the non-compliant food.

Closure – As per the Food Act. However, closure means CEASING THE TRADE OF FOOD. In some circumstances i.e. a roadhouse selling petro,I the focus must be on the food trade ceasing not the closure of the whole business.

Infringements – where needed, use Department of Health – Guideline on infringement notices under the Food Act.





Food premises - recording of inspections.

Every authorised Officer interaction (at premises, email or phone) with a registered food premises/registered food business operator must be recorded on the HealthManager software; registered premises data base - 'the register' for purposes of section 43 (1) of the *Food Act 1984*.

It is important that all authorised Officers be reminded that all in-field data captured must be recorded on HealthManager and this data is ultimately forwarded to the Department of Health and Human Services (DHHS) quarterly. The municipality also has obligations to report under the Local Government Performance Reporting Framework (LGPRF). All municipal food safety compliance regimes and data are subject to various periodic internal and external audits.

Consistent data entry to HealthManager is therefore important and whilst Officers have many discretions for interpreting risks, this guide assists to ensure inspection, data entry and risk profile consistency. BBSC HealthManager software permits food premises scoring from 100 points and has been set with the following 'Trigger Points':

- All minor non-compliance will result in the HealthManager software deducting 1 point
- All Major non-compliance observations 5 points
- All Critical non-compliance observations 10 points

Overall (summary) food premises Trigger points are:

- Compliant (fully compliant) 85-100
- Complaint (minor non-compliance) 65-84
- Non-compliant (major non-compliance) 50-64
- Critically non-compliant <0-5050/100

HealthManager will not always return a score reflective of Officer observations. It is therefore important for authorised Officers to truly consider each observation both in terms of the food trading risk, the points that will be deducted and the end (summary) score. As public health professionals, Officers will have a good sense of what end HealthManager (summary compliance description - compliant, noncompliant/major non- compliant and critically non-compliant) should apply to each food premise.

Examples of a common inconsistency for inspecting staff: An Officer observes a kitchen wash hand-basin cannot be accessed as boxes of foods, ready for deep frying, are blocking staff being able to reach the basin. The Officer notes four other non-compliant observations.

1/ The Officer may deduct 1 point; "ensure access to the wash hand basin". and four points for the other non-compliances which would return a HealthManager score of 95/100. Or:

2/ The Officer deems that a basin with restricted access infers food handler hands are not being washed, a critical non-compliance deducting 10 points, combined with the ready to fry foods on the floor a further critical non-compliance deducting 20 points. Along with four other observations being 3 minor (3 points) and another 1 major (10 points) return a HealthManager score of 67/100.

There is no right or wrong – only consistent approach and consideration to consumer risk.

The following should be considered the key to food premises inspection, Officer inspection application of the Food Act, related food standards code and overall food safety. The following table along with the proceeding inspection guidance gives a weighting to observations and guides if these attributes should be reported on HealthManager as minor, major or critical;



Food Handling	Unacceptable or poor food handling should be considered critical
Food Volumes	Unacceptable food volumes = critical
Food Processes	Unacceptable processes = critical
Food Product Reach	N/A – but extensive reach – i.e. a large exporter may escalate risk observation from minor to major or major to critical
Food Temperatures	Unacceptable = critical
Cleanliness	Unacceptable may only = minor (take a festival or event – the premises may have a dirt floor cleaning is irrelevant). Equipment cleanliness however may trigger unacceptable = critical
Structure	Likely to only trigger = minor
Operator Respon- siveness	N/A – but is a multiple of other attributes. If an operator is not responding to improvement directions re-consider risks and determinations of compliant, major, critical.
Food Safety Records	Likely to only trigger = minor
Food Safety (staff) Training	Likely to only trigger = minor



	Attribute context = Unacceptable	Attribute context = Poor to Average	Attribute context = Good to Excellent
Food Safety Observation =	Temporary bench space is being used to accommodate excess food preparation volumes.	Hand Wash Basin operational with no soap and no paper towel, cold water only	Hand washing facilities used regularly, staff sighted using facilities.
FOOD HANDLING – including: Staff knowledge. Food preparation. Volumes. Inventory control. Excess food. General food mismanagement. Storage and storage conditions.	Staff have no regard for cross contamination, not just from one surface to another but from one process contaminating another. Hand Wash Basin not operational or not accessible or operational with excessive efforts (i.e. water has to be turned on or malfunctioning auto tap etc). Cuts or skin colour Band-Aids without gloves. Tongs used for raw to cooked foods or bare hands handling ready to eat foods. Premises excessively overstocked or foods stored directly on floor.	Staff not washing hands regularly. Insufficient tongs to ensure separate use for raw and cooked foods Poor stock rotation or insufficient turn over for stock amount stored. Exposed foods, possible contamination. Excessive jewellery, untied long hair. Inadequate labelling on repackaged foods.	Good food hygiene policy implemented. Brightly coloured. Band aids and gloves provided for use if injured. Jewellery policy in place. Gloves used appropriately. Staff wear protective clothing.
	No labelling on repackaged foods. Inappropriate transporting of food (foods not transported in a manner that protects from contamination).		
Guiding notes -Food Handling	 Unregistered (and not previously registered) = Closure (until registration process is complete). Unacceptable = Infringement when any other attribute is average, poor or unacceptable. Foods witnessed as having significantly compromised food quality must be seized. Unacceptable = take photos. Unacceptable = Food Act Formal Notice - Section 19W(3)(a) staff to undertake training within a specified time. Consider other formal warnings to operator. Operator History - if operator noted has previously been observed with unacceptable food handling AND received infringement AND/OR formal notice - further observations of unacceptable food handling = prosecution. Proprietors often state "why are you inspecting when I'm so busy". They need to be reminded Food Handling is the most important aspect of a food business and Officers want to be assured they know good food handling. Remind the business that looking at a kitchens structure and cleanliness whilst important, does not inform an Officer about a handlers food knowledge. Unacceptable observations = Critical. Follow-up On any notice issued, within 14 days to ensure food handling is corrected, within 14 days to ensure operator understands severity of non-compliance. 		
HealthManager documentation notes - Food Handling	Food handling can be considered th safety attribute is average, poor or u food handling should reflect a CRITIC	nacceptable. A premise observe	ed as having unacceptable



	Attribute context	Attribute context	Attribute context
	= Unacceptable	= Poor to Average	= Good to Excellent
Food Safety Observation = FOOD MANUFACTURING PROCESSES	Equipment is not appropriate for the preparation of food. A food preparation process is clearly wrong. Any reasonable person would question the process and 'ought reasonably to know' food safety is being compromised. The food operator is embarrassed when the process, preparation or food manufacturing is pointed out. EHO has questions/doubts the risks if the food being made is available to consumers. Operator appears to be involved in a once off food manufacturing for which they have not well planned ar considered food againt.	Temporary equipment is part of the process to deal with increased demand, but operator is aware to purchase more appropriate equipment and is responsive. Staff are using less than ideal equipment when correct equipment exists on premises and will be used.	Rigid and consistent day to day food manufacturing processes and procedures.
Guiding notes	 or considered food safety. If unacceptable manufacturing processes, consider food seizure. If unacceptable AND any other attribute = Average, Poor or Unacceptable - Seize foods. Average to Poor -consider if food samples should be taken. Average, Poor or Unacceptable sterilization - provide education on sterilization techniques.		
food processing	For food manufacturers provide outline of HACCP and encourage operator to educate themselves on HACCP. Use of non-reticulated water in the food process - Is the food operator aware they are using non-reticulated water? Check the non-reticulated water supply poses no risk to end product and consider water sampling for reassurance of low coliform/E.coli counts. Poor food related commercial decisions - If the premise has compromised food safety because of Poor or Unacceptable commercial decisions - consider Seizure of exposed (non-temperature controlled foods). If changed processes is a higher risk process; changing the Class of the premises upward; Class 3 to Class 2, require that (Class 2) process stops until other attributes of food safety comply (structure, FSP and correct Food Act registration).		
HealthManager documentation notes - Food Handling	Any process observed as unaccepta	ble should reflect CRITICAL on H	ealthManager.



	Attribute context = Unacceptable	Attribute context = Poor to Average	Attribute context = Good to Excellent
Food Safety Observation = CLEANLINESS	Outright filth in food preparation areas. Putrid/rancid built up grease,	Premises likely to have daily dirt still existing.	Premises appears to be in a clean condition including the daily operational mess being cleaned up as they go.
	dirt. Clearly has not had any recent routine cleaning.	Possibly shelving and the like not cleaned regularly enough.	
	No understanding of how equipment or machinery is disassembled to ensure good cleaning.	Built up dirt behind equipment, underneath difficult to move items and in corners.	
	Filth on equipment that Will come in contact with exposed food.	Over-looking difficult to clean equipment.	
		Filth on secondary equipment (equipment not in contact with food – trolley wheels).	
Guiding notes -	 If unacceptable + food handling up 	 Inacceptable – Closure.	
Cleaning	If unacceptable and other attribu	tes poor/average – Infringemen	t.
	If unacceptable and a food chain Corporate office.	(KFC, Coles, Subway etc) advise	Regional Manager or
	Follow-up		
	If Unacceptable, Poor, Average (and 3 working days; premise to be Good		to follow up in not less than
HealthManager documentation notes			
Food Safety	Non- commercial or extensively aged or damaged food	Premises cluttered with excess equipment.	All equipment in good working order.
Observation =	preparation (exposed food) areas. Structure poses a risk to product.	Internal surfaces may require some structural work.	All wall, floor and ceiling surfaces structurally
PREMISE STRUCTURE	Structure does not support or assist any.	Hand Wash Basin operational with cold water only.	sound. No gaps/holes for pests to enter.
	Many damaged surfaces.	Worn flooring surfaces may	
	Many holes throughout premises to allow pests to enter.	require attention. Shelving and the like may	
	Equipment damaged that may cause contamination to food.	require resurfacing in places.	
	Hand Wash Basin not operational or not accessible.		
	Entire premise requires repainting.		
Guiding notes -structure	Poor or average structure can contribute to pathogen growth as dirt/grease/food waste may not be easily cleaned.		
	 Aged structure with a good cleaning regime and all other attributes Good, doe necessarily pose a significant food safety risk. 		
	Always work with the food busines	ss to encourage structure upgra	des.
	• ****A non-working wash hand bas Structure deficiency. It is a Poor or		ithout a basin is not a
HealthManager documentation notes	Premises structure will generally not evolve a HealthManager Major or Critical unless in turn the structure is impacting food process or food handling. Observations will generally be 'minor'.		



	Attribute context = Unacceptable	Attribute context = Poor to Average	Attribute context = Good to Excellent
Food Safety Observation = OPERATOR RESPONSIVENESS	Operator will not accept Officer advice on matters that a reasonable person would know compromise food safety. Prolonged (2 yrs. +) history of sporadic compliance - indicative of unreasonable responsiveness to education and advice.	Staff responsiveness low/ owner and or operator can address.	Staff, operator and business owner all embrace food safety. Operator openly pursues up to date food safety information.
	Within the complex "Food as a business" is clearly secondary – i.e. a petrol station roadhouse. The operators consequently have a mindset of food being less important. History of non-compliance with little efforts to make food safety improvements.		
Guiding notes	 Assess - Operator Compliance his Unacceptable response to a form half or greater of the items on a for Follow-up Consider if Coordinator should account 	al notice = prosecution (if there ormal notice with reasonable tim	ne-frames).
HealthManager documentation Notes	Consider if Coordinator should accompany on joint visit/inspect to stress importance of food safety to food business operator. This is not generally applicable to HealthManager and scoring. However, low responsiveness to direction, advise, improvement suggestions can escalate risk and change a 'minor' observation to 'major'.		
Food Safety Observation = FOOD SAFETY RECORDS. Product traceability. Evidence of FSS. Training. knowledge. Labelling. Product declarations.	 When asked about the history of a food product the operator cannot prove history. Officer suspects food products originated from a domestic or unregistered source. Food Safety Program not on site, nothing implemented. No thermometer or not an approved thermometer onsite. FSS not qualified. No label, no information. No product traceability. High likelihood of undeclared allergen risk. 	FSP on site and half of the records are kept and sections implemented. Minimal records being kept are current. Question if records have been pre-populated. Thermometer on-site but away from obvious frequent use. FSS qualified but not imparting knowledge to staff.	FSP onsite, all records being maintained and appropriate sections being implemented. FSS readily available. Additional programs implemented not required in template. Additional records and site policies in place and clearly being implemented. All staff trained and fully aware of good food safety practices. Demonstrate excellent understanding of requirements. Additional training, certification or quality control standards implemented.
Guiding notes	No label, no information - seize. Records should include evidence of	staff training.	1