

REDUCING THE COMPLIANCE BURDEN FOR VICTORIAN FOOD BUSINESSES

Stage 1- Food Safety Programs

- Some businesses will no longer need to maintain a Food Safety Program.
- The reduced requirement does not apply to all businesses universally.

Stage 2 – Reduced Audits

- PrimeSafe is introducing a revised audit schedule for compliant businesses;
- Many businesses will be audited less frequently;
- The reduction does not apply to businesses consistently found to be non-compliant.

PrimeSafe is streamlining its requirements to make compliance easier for almost 7,500 low-risk licensees, while retaining food safety as its number one priority.

Many of the changes bring Victorian food safety auditing requirements in line with other states.

Stage 1- Food Safety Programs

The first stage of this work involves removing the requirement for some licensees to maintain a Food Safety program.

Licensees must continue to ensure food is prepared, processed, transported, stored, and displayed in line with current Australian Food Safety Standards.

Stage 2 – Reduced Audits

The second stage involves the reduction of the number of audits for PrimeSafe licensed businesses and still meeting the requirements of food safety and regulatory standards.

Stage 1- Food Safety Programs

Wildcatch seafood businesses

Wildcatch seafood businesses that catch seafood other than bivalve shellfish will no longer be required to maintain a Food Safety Program, however, they will be still required to monitor the temperature of seafood that is no longer live to a chilled temperature of no greater than 5°C.

All frozen seafood must remain frozen.

Low risk wildcatch seafood businesses will still be subject to periodical vessel inspections to confirm compliance with the Food Standards Australia New Zealand.

A wildcatch seafood business harvesting bivalve shellfish is considered high risk and must therefore maintain a compliant Food Safety Program that will be audited on a scheduled basis.

All PrimeSafe licenced seafood businesses that receive, process, sell or store seafood (i.e. wholesalers, processors and further processors (W licences) and seafood retailers (R licences) must still maintain a compliant Food Safety Program that will be audited as part of PrimeSafe's compliance arrangement.

Small retail facilities

Small retail facilities that handle meat, seafood and pet food will no longer be required to conduct internal audits or management reviews as part of the PrimeSafe licensing requirements.

This change is only applicable to small retail facilities that includes retail butcher shops (T licences), seafood retailers (R licences) and pet food establishments (PF) that have less than 20 workers.

Some businesses may choose to maintain internal audits and management reviews as part of their Food Safety Program to satisfy customer requirements for instance, however these elements will no longer required to be undertaken as part of PrimeSafe licensing requirements and presented at an audit.

Meat transport vehicles

Meat transport vehicles will no longer require a Food Safety Program as part of PrimeSafe licensing requirements.

Monitoring records will no longer need to be presented for review at annual vehicle inspections.

Temperature of meat and seafood must still be monitored during transport so that chilled products have a temperature of no greater than 5°C and frozen products remain frozen during transportation.

Licensees must ensure that vehicles continue to be either fitted with or have access to a temperature measuring device, such as thermometer, data logger or thermograph that is routinely calibrated and operable during transportation of all meat and seafood that is no longer live.

Construction requirements for MTVs will continue to be assessed at vehicle inspections.

Stage 2 – Reduced Audits

Revised third party audit arrangements

A revised audit schedule that is based on inherent product risk is a sensible approach to modernising food safety regulation and reducing regulatory burden where possible.

PrimeSafe already has an existing Reduced Audit Program which acknowledges superior performance by offering a 50% reduction in audits. However, uptake has been poor, with only a small number of businesses submitting a proposal to be considered for a reduction.

Compliance rates at third party audits have been steadily improving over recent years and compliance now exceeds over 97% of licensees. This means that most businesses are complying with the Standards and licensing requirements.

In recognition of this sustained compliance by licensees, and when considering a modernised regulatory approach, PrimeSafe is able to reduce the number of audits that will be required for most PrimeSafe licensed business types, irrespective of their participation in the existing Reduced Audit Program.

Table 1 indicates the current and new audit frequencies that will automatically apply to each licence type, as from 1 July 2023.

Implementation plan for revised audit arrangements

The revised audit arrangements are scheduled to be implemented from 1 July 2023. Implementation of the revised audit frequencies will be immediate for all new businesses commencing operations on or after 1 July 2023, with the next audit for existing businesses after 1 July 2023 to remain as currently scheduled, after which time the new frequency will also apply.

For example, a Retail Butcher shop (no smallgoods) currently on audits every 6 months which had an audit on 1 March 2023, will have its next audit on 1 September 2023, with its following audit due on 1 September 2024. This allows for businesses and auditors to prepare where they may have already created audit plans for this year that do not necessarily capture the full system. Food safety programs can then be fully audited at the final audit before the extended gap of 12 months in between audits comes into effect.

Licensees should also be aware that annual audit costs that were previously spread across multiple audits each year may now need to be charged at fewer audits, such as the annual JAS-ANZ fee.

In addition, as there will be fewer audits for most licence types, licensees can expect the scope of audits to be greater so that the entire food safety system can be assessed in the reduced number of audits. Individual audits may be longer in duration to cover the extended audit period; however the annual audit costs should reduce given the lower number of audits.

Merging of seafood processor and aquaculture licences for some businesses

As of 1 July 2023, PrimeSafe will permit holders of an Aquaculture licence who also hold a licence to operate a Seafood Processing Facility to merge their Aquaculture licence and operate their business under their Seafood Processing Facility licence alone. PrimeSafe will no longer require separate Aquaculture audits to be conducted for the applicable businesses. Items previously covered in an Aquaculture audit will be covered by the third-party audit required for a Seafood Processing Facility licence.

PrimeSafe's verification program for reduced audit arrangements

Given PrimeSafe has removed some regulatory burden around internal monitoring requirements and reduced audits, it will provide additional external oversight (at no cost to businesses) to ensure businesses are still focussed on food safety. This will involve inspections conducted by PrimeSafe officers that may assess general hygiene and sanitation of a facility, as well as a review of Process Hygiene Criteria (PHC) and Critical Control Points (CCPs). These will be conducted in conjunction with existing surveillance activities. Enforcement action will be taken as per the PrimeSafe Compliance and Enforcement Policy where serious non-compliance is identified at these inspections.

Non-compliance

While PrimeSafe has introduced these measures to ease the compliance burden, food safety is still its number one focus. Audit frequency may be increased in instances where non-compliance is identified until the issue(s) are rectified.

Future work

PrimeSafe will continually monitor the impact of these changes to ensure food safety is maintained.

Further changes that are designed to reduce the burden of compliance on the affected businesses will be announced in coming months.

Want to know more?

If you have any questions, please visit the PrimeSafe website www.primesafe.vic.gov.au or contact PrimeSafe info@primesafe.vic.gov.au or by phone on (03)9685 7333.

Table 1- Current and New Audit Frequencies

LICENCE CATEGORY	FREQUENCY	
	Current	New
Domestic Abattoirs	4 per year	2 per year
Pet meat processor (knackery)	4 per year	2 per year
Further meat processor (smallgoods)	4 per year	2 per year
Game meat processor	4 per year	2 per year
Retail butcher shop (smallgoods)	4 per year	2 per year
Seafood business (smallgoods)	4 per year	2 per year
Poultry processor	2 per year	2 per year
Further meat processor (no smallgoods)	2 per year	annually
Prime tallow processor	2 per year	annually
Inedible renderer	2 per year	annually
Retail butcher shops (no smallgoods)	2 per year	annually
Seafood business (processing meat)	2 per year	annually
Pet food establishment	2 per year	annually
Meat processor (packaged meat only)	annually	*Exempt
Seafood business	annually	annually
Harvest vehicle	annually	annually
Field Depot	annually	annually
Aquaculture (bivalve shellfish)	annually	**2 per year
Aquaculture	annually	annually
Wildcatch (bivalve shellfish)	annually	**2 per year
Wildcatch (non-bivalve shellfish)	every 2 or 3 years	every 3 years
Meat Transport Vehicles	annually	annually

*The handling, storage and transportation of packaged meat is exempt from PrimeSafe licensing as from 1 January 2023, following the passing of the Agriculture Legislation Amendment Bill 2022.

** Bivalve shellfish harvesting seafood businesses are high-risk and an increase to a biannual audit frequency is therefore being applied to these licence types. This is also consistent with the National approach to these activities.