



Restaurant
& Catering

National Reduction in Foodborne Illnesses Strategy

R&CA Submission

March 2018

RESTAURANT & CATERING AUSTRALIA

Restaurant & Catering Australia (R&CA) is the national industry association representing the interests of over 45,000 restaurants, cafes and catering businesses across Australia. R&CA delivers tangible outcomes to small businesses within the hospitality industry by influencing the policy decisions and regulations that impact the sector's operating environment.

R&CA is committed to ensuring the industry is recognised as one of excellence, professionalism, profitability and sustainability. This includes advocating the broader social and economic contribution of the sector to industry and government stakeholders, as well as highlighting the value of the restaurant experience to the public.



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INTRODUCTION

R&CA welcomes the opportunity to provide a submission to *Australia's Foodborne Illnesses Reduction Strategy 2018-2021+*. As the national industry association representing the interests of over 45,000 cafés, restaurants and catering companies operating throughout Australia¹, R&CA is uniquely well-placed to provide comment on the development, implementation and execution of the proposed national strategy to prevent incidences of foodborne illnesses. R&CA is committed to ensuring that the highest standards of food safety, food handling and hygiene practices are upheld among the foodservice industry, including the café, restaurant and catering sector. To this end, R&CA supports the overarching objective as outlined in the Consultation Document of reducing foodborne illnesses with particular respect to *Campylobacter* and *Salmonella*. However, in light of the recent listeria outbreak associated with contaminated rockmelons leading to multiple deaths in NSW², R&CA would caution against an over-emphasis on these two particular foodborne illnesses.

R&CA strongly cautions the Food Regulation Secretariat against any unnecessary administrative or regulatory burdens being placed on businesses within the foodservice sector as part of the implementation of this national strategy. As part of this, R&CA argues that lower-risk industries such as the café, restaurant and catering sector should not be forced to comply with additional regulations which go beyond their overall capacity to implement significant changes. R&CA believes that the final national strategy preventing foodborne illnesses should incorporate an explicit focus on targeting individual behaviours around food preparation and consumption in the home, including a national consumer education and awareness campaign. Furthermore, R&CA argues that food safety deficiencies among higher-risk industries such as the commercial bakery and food manufacturing sectors must also be addressed as part of the final strategy.

¹ Australian Bureau of Statistics (ABS) (2018) *8165.0 - Counts of Australian Businesses, including Entries and Exits, Jun 2013 to Jun 2017*.

² NSW Food Authority (2018) *Listeriosis outbreak linked to rockmelon*, Media Release, 28 February, <http://www.foodauthority.nsw.gov.au/news/newsandmedia/departmental/2018-02-28-listeriosis-outbreak-link-to-rockmelon>

POLICY PROPOSALS

R&CA welcomes the national focus included as part of the development of this strategy, noting that a 'patchwork' approach varying across jurisdiction is rarely ever effective in achieving optimal policy outcomes. In contributing to the contents of this strategy, R&CA wishes to put forward the following policy proposals to achieve the overarching objective of reducing human cases of foodborne illnesses in Australia:

- Unnecessary administrative or regulatory burdens should not be placed on low-risk industries such as the foodservice sector which go beyond the capacity of these businesses ability to adapt to significant changes; in Australia, it is already a legal requirement that all food handlers must be trained in food safety.
- Proper and robust data collection on the causes and sources of foodborne illnesses is needed as part of the development and implementation of the national strategy;
- A national consumer education and marketing campaign targeting awareness of safe food storage and consumption practices must be a central component of the national strategy;
- The strategy should prioritise the development of a common set of national food safety standards which are applied and interpreted consistently to businesses operating across all Local Government Areas (LGAs); and
- The Food Regulation Secretariat should pursue ongoing engagement and involvement with industry stakeholders including various industry associations to deliver sustained improvements in food safety outcomes across the country.

R&CA acknowledges that there is no singular solution to the outbreak of foodborne illnesses, however believes that a sustained reduction can be achieved through a combination of strategies aimed at improving consumers and businesses' knowledge and awareness of optimal food safety and hygiene practices.

APPROACH TOWARDS DECREASING FOODBORNE ILLNESSES

LOW-RISK PROFILE OF FOODSERVICE SECTOR

R&CA argues that no unnecessary administrative or regulatory requirements should be placed on businesses in the foodservice sector, believing this to be counterproductive in achieving the overarching objective of the strategy in reducing foodborne illnesses. R&CA believes that the national strategy, as outlined in its current form, fails to adequately acknowledge the café, restaurant and catering sector as a lower risk industry in comparison to others such as the commercial bakery and food manufacturing industries. For instance, the Consultation Paper refers to “*clear evidence from recent outbreaks associated with eggs that the behaviour of food services was the critical factor in increasing the number of people who became ill*”.³ This statement has been included in the Consultation Document without any further elaboration as to the source or nature of this evidence.

R&CA also notes that the source of the datasets included within the Consultation Document pointing to a sharp increase in salmonella incidents since 1991 has not been supplied. Whilst the overall statistics of 56,200 cases of Salmonella including 2,100 and 15 deaths⁴ are mentioned, no information is provided as to the proportion of outbreaks amongst the foodservices sector or otherwise. R&CA argues that the utility of this data is limited given that it gives no indication as to the proportion of these outbreaks among individual sectors or industries. R&CA, therefore, would caution against using such datasets as justification for the imposition of additional regulation or costs on foodservice businesses.

R&CA suspects that a significant proportion of these outbreaks would be confined to higher risk industries such as the commercial bakery sector and food manufacturing sectors. R&CA points to recent examples of salmonella outbreaks in the commercial bakery sector including 35 confirmed cases of salmonella linked to sandwiches, wraps, rolls and focaccias sold at a bakery north of Adelaide, including three hospitalisations in December 2017⁵ and 203 documented cases of people

³ Ibid.

⁴ Ibid.

⁵ SA Health (2018) *Gawler South bakery salmonella update*, 2 January, <http://www.sahealth.sa.gov.au/wps/wcm/connect/public/content/sa+health+internet/about+us/news+and+media/media+releases/gawler+south+bakery+salmonella+update>

who presented to hospitals or doctors with gastroenteritis symptoms after eating food linked to a bakery in Sylvania, NSW in January 2016.⁶

Furthermore, R&CA argues that a significant proportion of salmonella outbreaks occur in private residences which has not been adequately discussed in the Consultation Document. A 2017 report from Whiley, Clarke and Ross states that there are '*numerous studies which have demonstrated that a significant proportion of foodborne illness can be attributed to improper food safety practices in the home.*' The report identifies that 28 per cent of egg-associated salmonellosis outbreaks in Australia from 2001 to 2011 were linked to private residences.⁷ The authors conclude that '*this study observed that respondents were potentially not recognizing or not acknowledging risks associated with handling eggs and cooking with raw egg products in the home.*'⁸ The authors point towards 86 per cent of respondents affirming they lick bowls or utensils containing raw egg mixture.⁹ Given the current food preparation and consumption habits of consumers, R&CA argues that addressing this factor must be a central component of this strategy.

Recommendation

- Unnecessary administrative or regulatory burdens should not be placed on low-risk industries such as the foodservice sector going beyond the capacity of these businesses ability to adapt to significant changes.

INCREASED DATA COLLECTION EFFORTS

R&CA believes that the further efforts should be devoted towards robust and proper data collection as part of a national approach towards the reduction of foodborne illnesses. In this regard, R&CA welcomes the proposed mid to long-term commitments as outlined within the Consultation Paper to "*conduct a national benchmark study on food handling knowledge, practices and food safety culture to inform education, training and resource development priorities.*"¹⁰ R&CA argues that the

⁶ NSW Food Authority, (2017) *Box Village Bakery fined for food safety breaches*, Departmental (media releases), <http://www.foodauthority.nsw.gov.au/news/newsandmedia/departmental/2017-12-11-box-village-bakery-fined>

⁷ Whiley, H., Clarke, B., and Ross, K. (2017) *Knowledge and Attitudes towards Handling Eggs in the Home: An Unexplored Food Safety Issue?* Int. J. Environ. Res. Public Health 2017, 14, 48.

⁸ Ibid.

⁹ Ibid.

¹⁰ Ibid, p.11.

current levels of statistical information around food safety and hygiene issues are insufficient in guiding a national strategy to reduce the incidences of foodborne illnesses. In this regard, more concrete and current information is needed as to number of incidences, the source at which the incident occurred, the responsible agent for causing the illnesses, and the level of impact caused to the patient.

Recommendation

- Proper and robust data collection on the causes and sources of foodborne illnesses is needed as part of the development of the national strategy.

CONSUMER EDUCATION AND MARKETING CAMPAIGN

R&CA argues that consumer awareness of food safety and food storage practices is pivotal in ensuring that foodborne illnesses are recognised as a significant threat to public health and that optimal food safety and hygiene practices are adopted. Given that the majority of food preparation occurs in consumers' private residences, this represents the statistically most likely chance of foodborne illnesses occurring. Therefore, sufficient attention must be given to foodborne illnesses arising in private residences to achieve the strategy's desired outcome of reducing outbreaks and the subsequent health and economic impacts. R&CA argues that current levels of consumer education and knowledge is insufficient in achieving this outcome and that R&CA believes that a national food safety marketing and consumer awareness campaign is necessary.

R&CA believes that to maximise the success of such a campaign, there are several structural and design elements which must be adopted as a matter of urgent necessity. First, R&CA stresses that any educational materials produced as part of this consumer and education campaign must be concise, simple for consumers to understand and be produced in '*plain-English*'. R&CA also believes that such a campaign should incorporate as many digital and technological tools as possible to disseminate proper food safety and hygiene messages to consumers, particularly younger consumers who may have wider gaps in food safety and hygiene knowledge. R&CA is pleased that the Consultation Document has already committed to investigating '*the use of technology for targeted consumer education*'.¹¹ This should be in addition to the dissemination of physical educational

¹¹ Ibid, p.14.

materials in more traditional fora such as schools, universities, TAFE colleges, doctors' offices and hospitals.

Recommendation

- A national consumer education and marketing campaign targeting awareness of safe food storage and consumption practices must be a central component of the national strategy.

CONSISTENT APPLICATION OF FOOD SAFETY LAWS ACROSS ALL LGAS

R&CA has long advocated for the development of a set of national food safety laws to be applied consistently across all businesses within the foodservice sector. Businesses, particular those with multiple venues operating across several different Local Government Areas (LGAs) or states and territories, have continually expressed their confusion and frustration with food safety laws being applied differently depending on which LGA their business is located in. R&CA argues that food safety outcomes would be improved significantly across the foodservice sector if the ambiguity surrounding the application of food safety laws is removed. R&CA believes that there may be a correlation between geographical areas with proportionally high incidences of foodborne illnesses and LGAs where food safety laws are not being applied in the correct way.

In R&CA's view, the development of a national set of food safety laws which are then applied in a fair and consistent manner across all LGAs would be helpful in achieving the Review's objective of reducing the incidences of foodborne illnesses. R&CA also believes that this process would be assisted by the publication of clear guidelines to businesses regarding the interpretation of food safety laws. Whilst R&CA is strongly committed to ensuring highest possible levels of adherence to food safety laws amongst the foodservice sector, achieving this outcome is made more difficult when business-owners are unclear on how the relevant food safety standards apply to their business, depending on its location. Therefore, R&CA argues that an updated set of food safety standards and interpretation guidelines should be adopted to prevent confusion among business-owners and avoid outbreaks of foodborne illnesses in LGAs where food safety measures are currently applied inconsistently or incorrectly.

Recommendation

- Development of a national set of food safety laws to be applied consistently across all Local Government Areas (LGAs), alongside clear guidelines on their interpretation.

ENGAGEMENT AND INVOLVEMENT WITH INDUSTRY STAKEHOLDERS

R&CA welcomes the collaborative efforts undertaken by the Food Regulation Secretariat with industry stakeholders on a variety of policy issues to date. R&CA believes industry stakeholders, including industry associations, should be extensively involved at all stages in the consultation and implementation phases of the proposed national strategy aimed at the prevention of foodborne illnesses. In R&CA's view, proper advice from industry stakeholders is needed to ensure the best possible chances of success in achieving the strategy's overarching goals.

In R&CA's view, industry associations provide an essential conduit between government and businesses which can be utilised to achieve optimal policy outcomes. R&CA has already been actively involved on its own accord in promoting optimal food safety practices to its member businesses. For instance, R&CA produces its own 'doggie-bagging' stickers which it distributes to individual foodservice businesses, containing specific instructions to consumers on how to safely store and consume food after they have removed it from the business. R&CA's doggie back stickers which can be attached to individual food containers also have instructions on proper hygiene practices to ensure that foodborne illnesses are minimised. It is vital that businesses in the foodservice sector are equipped with adequate information which they are able to pass on to consumers so to avoid outbreaks of foodborne illnesses from improper handling of safe food.

Recommendation

- Pursue ongoing engagement and involvement with stakeholders including industry associations to deliver sustained improvements in food safety outcomes across the country.

CONCLUSION

R&CA appreciates the opportunity to provide a submission to the *National Reduction in Foodborne Illnesses Strategy 2018- 2021+*. R&CA is committed to achieving outcomes within the foodservices sector which greatly minimise the occurrences of foodborne illnesses such as *Campylobacter* and *Salmonella*. R&CA continually provides its members with best-practice food safety advice as part of its own efforts to minimise the occurrences of foodborne illnesses and supports the articulation of a national approach towards ameliorating this issue. R&CA is cognisant of the critical importance of food safety in supporting its own mission of promoting the overall value of the dining experience to consumers.

As R&CA has already expressed within this submission, the imposition of additional administrative and regulatory requirements on businesses within the foodservice sector should not be pursued as part of this strategy. Rather, R&CA believes that food preparation within private residences should form a key focus of the final strategy, including a national consumer education and awareness campaign regarding optimal food safety and hygiene practices. Such a campaign should be guided by robust data sources which would enable a more sophisticated approach towards changing individuals' food preparation and consumption habits. R&CA also argues that the objectives of this strategy would be best achieved by implementing a common set of food safety standards and interpretation guidelines which are consistently applied to businesses across all LGAs.

REFERENCES LIST

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