

Ref: MF23/2951

1 November 2023

Mr Chiang Lim  
CEO, NSW Australian Childcare Alliance  
19 Fennell Street  
PARRAMATTA NSW 2150

[REDACTED]

Dear Mr Lim,

Thank you for your letter of 9 October 2023 to the Hon Tara Moriarty MLC, Minister for Agriculture, expressing concerns about the coming into effect of new national food safety requirements. The Minister has asked me to respond to you on her behalf.

Foodborne illness is a common, costly, sometimes life threatening and a largely preventable public health problem. Children are particularly vulnerable to the serious harms of foodborne illness.

The new food safety standard (Standard 3.2.2A Food Safety Management Tools) aims to strengthen food safety practices in the food service sector. A key reason why food service is the focus of this standard is that of the estimated 4 million cases of foodborne illness each year (costing AUD 2.44 billion), 3.2 million are linked to the sector.

Standards are set by the independent statutory authority Food Standards Australia New Zealand (FSANZ) who consulted publicly on Standard 3.2.2A in February 2020 and February 2022.

Across Australia, a food business is one that handles food for sale. All food businesses must meet the requirements of the Australia New Zealand Food Standards Code (the Code). However, not all early childhood education and care providers are a food business. Those who do not supply food, or offer infrequent educational activities involving food, are not subject to the Code as the Food Authority has already advised.

The NSW Food Authority understands that more time may be needed by some providers to fully implement the new requirements. The NSW Food Authority has asked local councils, which regulate food safety in the sector, to adopt an educational and support role during this transitional period, aimed at assisting food businesses to understand and implement the new food safety requirements.

The NSW Food Authority has developed resources to assist the children's services sector with the implementation of Standard 3.2.2A. These are available on the NSW Food Authority's website at <https://www.foodauthority.nsw.gov.au/retail/standard-322a-food-safety-management-tools>.

To further assist food businesses, a free online course entitled 'Food Handler Basics Training' has been developed by the NSW Food Authority and is available on its website at <https://www.foodauthority.nsw.gov.au/training/food-handler-basics-training>. To date, over 26,000 participants have successfully completed the course.

The NSW Food Authority welcomes further opportunities to provide advice to the ACA on food safety.

Yours sincerely,

A handwritten signature in black ink that reads "John Tracey". The signature is written in a cursive, flowing style.

**John Tracey**  
Deputy Director General  
Biosecurity and Food Safety