The Victorian dairy food safety system

Presentation to the Unilever Sustainability Forum 2012
Overview

Australia’s National Food Safety System
- Standard Development
- National Implementation Framework

DFSV’s Regulatory Approach:
- Licensing & Validation
- Audit & Performance
- Verification & Enforcement

Summary
Australia’s Dairy Food Safety System

Prescriptive Standards

Outcomes-based Standards

Traditional Inspection

HACCP-based Company QA Programs

End point Testing

Whole of Chain Approach

integrity & assurance

(C) Dairy Food Safety Victoria
National Dairy Food Safety Regulatory Framework

Model Food Act

Food Standards Code

Standards (All Foods)
3.1.1 Interpretation and Application
3.2.1 Food Safety Programs
3.2.2 Food Safety Practices and General Requirements
3.2.3 Food Premises and Equipment.

Standard 4.2.4
Primary Production and Processing Standard for Dairy (National Dairy Standard)

User Guide

National Implementation Plan

(C) Dairy Food Safety Victoria
Export Access and Dairy Food Safety Regulation

FOOD SAFETY

EXPORT

STANDARDS

MONITORING & SYSTEM VERIFICATION

HARMONISATION

Data

AUDIT

Certification (DAFF Regulates)

Regulation (SRA Food Safety)

(C) Dairy Food Safety Victoria
Compliance: operating within all regulatory requirements applicable to a licensee or dairy food.

This framework provides a risk-based, systems approach to dairy food safety regulation and:

- *ensures the protection of public health*
- *supports industry innovation by providing a flexible approach*
- *maintains minimum effective regulation*
• Mandatory pre-licensing inspection conducted by DFSV Authorised Officer
• Mandatory approval by DFSV of the business’s Food Safety Program.
• Businesses must have satisfied all requirements of the National Dairy Standard (NDS) and DFSV Code of Practice prior to being granted a licence
• All dairy businesses in Victoria must be licensed by DFSV prior to the sale of any dairy products
Validation & Approval - Farm

Mandatory under National Dairy Standard and HACCP Based

- Physical Contaminants
- Chemical Contaminants
- Microbiological Contaminants
- Dairy Milking Premises
- Hygienic Milking
- Water Supply & Quality
- Cleaning & Sanitising
- Traceability & Records
- Personnel Competency
Integration of Regulatory Requirements into Commercial Supply Arrangements

**Farm Quality Assurance Manuals:**
- Food Safety Requirements
- Other Regulations
  - Occupational Health & Safety
  - Environmental Management
  - Animal Welfare
  - Other
- Milk Quality Assurance System
  - Policy & Procedures
  - Standards & Testing
  - Market Access Requirements

DFSV

Other State Regulators

Milk Companies
DFSV EPA MoU

Dairy Gains Program 2004 - 2009

4 Questions on Effluent Management

EPA

Agreed Arrangement

Manufacturers

Agreed access by EPA to DFSV Audit System*
Manufacturers include 4 Questions in QA program
Manufacturers agreed for EPA to train Food Safety Auditors

Facilitated by DFSV via MoU (3 years in development)

*Individual farm details not provided, Critical Non-Conformances referred to manufacturer
Dairy Gains Questions

• Do you have an effluent system? (pond or direct application)
• Is your effluent contained on site? (does not leave the property boundary or enter surface waters - waterways, drains etc)
• Does your pond ever overflow, become crusted or never need emptying?
• Do you spread or rotate your effluent over at least 10% of farm to avoid nutrient overload?
Validation & Approval - Manufacturers

Additional requirements of NDS for high risk processes

• Application of CODEX HACCP
• Non conformance Control
• Maintenance
• Calibration
• Pest Control
• Testing Programs
• Pathogen Prevention Strategies
• Hold and Release
• Storage & Temperature Controls
• Cleaning & Sanitising Programs
• Product Traceability and Recall
Validation & Approval - Manufacturers

- Rework/product disposal
- Waste disposal
- Competency
- Internal audit
- Management responsibility
- Record retention
- Additional DAFF approved arrangement requirements
Information & Knowledge Products

Fundamentals of Food Safety and Quality – for Dairy Manufacturers

This short course is designed to provide a basic understanding of food safety and product quality to manufacturing staff. The subject matter will be delivered with a dairy industry focus.

This program is a joint initiative between Dairy Food Safety Victoria (DFSV) and the National Centre for Dairy Education Australia (NCDEA), developed to meet a specific training need for dairy factory staff to be educated in these subjects in a timely and effective manner.

TOPICS INCLUDE:
- Personal hygiene
- Good manufacturing practices (GMP)
- Potential sources of product contamination
- Introduction to food safety programs
- Basic HACCP
- Common dairy pathogens
- Support programs –
  - Pest control
  - Calibration
  - Traceability
  - Cleaning and sanitation
  - Water quality
Audit:
- Compliant with National Food Safety Audit Policy and Guideline
- Manufacturer Licensees are audited six monthly by DFSV officers
- Dairy Farms are audited minimum once per 24 months

Performance:
- Data analysis and trending that monitors key control points of the system
# Audit Frequency

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<tr>
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<th>Farm</th>
<th>Manufacturing Establishments</th>
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<tr>
<td><strong>Auditing</strong></td>
<td>Contracted/ Government</td>
<td>State Regulatory Authorities</td>
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<td><strong>Compliance Mechanisms</strong></td>
<td>Corrective Action Requests</td>
<td>Approved Arrangements</td>
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<td>• Minor</td>
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<td><strong>Frequency</strong></td>
<td>&lt; 2 years</td>
<td>6 monthly</td>
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DFSV FARM AUDITING SYSTEM

AUDITOR REQUIREMENTS
Audit Standard
Auditor Competence & Performance

REPORTING
National Dairy Verification Plan

DFSV DEED OF UNDERTAKING
ISC National Food Safety Audit Policy
ISC Australia & NZ Enforcement Policy

MINIMUM FOOD SAFETY REQUIREMENTS

DFSV REGULATES DAIRY FOOD SAFETY

Food Standards Code - Standard 4.2.4
FSANZ 4.2.4 Interpretive Guide
DFSV/TDIA/DASA/DAFF MoU
DFSV/DPI MoU
DFSV/EPA MoU

MARKET ACCESS/COMMERCIAL REQUIREMENTS

DFSV ASSURES* MARKET ACCESS REQTS

DAIRY MANUFACTURER QA PROGRAM

* Assures – verifies that action committed by industry has been undertaken
DFSV Product Testing Program

Results From Jan 2006 to June 2009

Ice Cream Average Coliforms
Jan 06 - Jun 09

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<tr>
<th>Manufacturer</th>
<th>Log (10) Coliforms/g</th>
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Coli Average of all samples (312)
Verification:

- *DFSV review of key elements of the regulatory system to test integrity and effectiveness*
- *National Dairy Verification Plan*
- *Australian Milk Residue Analysis (AMRA) Survey*
National Framework for Food Regulation in the Australian Dairy Industry

National Dairy Verification Plan

- Supports and Measures National Consistency
- State Dairy/Food Authorities
- Chaired by DFSV
- National Templates
- Cross Jurisdiction Audits
- Can be Targeted
- Delivery Review
- National Reporting
The Australian Milk Residue Analysis (AMRA) Survey - Independent Sampling Program

Aims
- Australia’s independent monitoring system
- Facilitates international trade and market access
- Risk identification and risk management of chemical residues
- Measures effectiveness of National System

Scope & Design
- agricultural and veterinary chemical residues & environmental contaminants
- tanker raw milk samples
- Ability to trace back retention samples
DFSV’s Enforcement policy conforms with the National Enforcement Policy and is based on a proportionate and graduated response to non-compliance.
Enforcement Model—escalation of DFSV’s enforcement action response to non-compliance

**STAGE 2. MEDIUM RISK**
- Verbal Warnings
- Written Warnings
- Directives
- Corrective Action Requests (CARs) – Major and Critical*
- Orders*

**STAGE 1. LOW RISK**
- COMPLIANT

**STAGE 3. SERIOUS RISK**
- Tools from stage 2 may be used in addition to:
  - Intensified Audit Frequency
  - Unannounced Inspections
  - Sampling Programs
  - Interviews re breaches
  - Withdrawal or suspension of FSP approval

**STAGE 4. SERIOUS/SUSTAINED RISK**
- Tools from stages 2, & 3 may be used in addition to:
  - Show Cause
  - Amendments to licence conditions
  - Licence Suspension
  - Licence Cancellation
  - Refusal to Renew
  - Prosecution

Key:
- FSP = Food Safety Program
- A = Assessment by Dairy Food Safety Victoria
- * The issue of a Critical CAR or an order will result in an Intensified Audit Frequency

Note: this is a guide only and DFSV will assess each business and their non-compliance(s) on a case by case basis, taking action by using the regulatory tool/s deemed appropriate under the specific circumstances.
**Stakeholder Benefits**

- Protection of Public Health – Especially in Vulnerable Populations
- Harmonisation of National and other requirements
- Ease of doing business with Government
- Supports Innovation
- Recognition, reputation & image
- Customer Assurance
- Minimum Effective Regulation
Concluding Remarks

- DFSV is able to provide assurances through its administration of the food safety system
- Additional components can only be assured after they have been negotiated and agreed (As per EPA MoU example)
- An alternative is individual company certification and a third party assurance system (outside that run by DFSV)
THANK YOU
**Acronyms used in this presentation**

In order of appearance:
- DFSV: Dairy Food Safety Victoria
- PIRSA: Department of Primary Industry and Resources South Australia
- DHSA: Department of Health South Australia
- DPIWE: Department of Primary Industries, Water and Environment (Tasmania)
- WA: Western Australia
- HACCP: Hazard Analysis Critical Control Point
- QA: Quality Assurance
- CODEX: Codex Alimentarius Commission
- DAFF: Federal Department of Agriculture, Fisheries and Forestry
- SRA: State Regulatory Authority
- CARs: Corrective Action Requests