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Allergen declarations

A suite of resources on allergen declarations have been developed by the Food Unit and are now available for food businesses, Food Act authorised officers and interested health professionals on the Public Health website.

The resources provide information on allergen declaration requirements under the Food Act 2008 (WA) (Food Act) and the Australia New Zealand Food Standards Code (the Code). Food allergies can be life threatening and are a growing concern in Australia. Sensitised individuals rely on allergen declarations to make decisions on what food is safe for them to purchase and eat.

The following resources may help authorised officers regarding allergen declarations:

- **The Food Act 2008 (WA) - guideline for allergen declarations by food businesses**: designed to assist enforcement agencies on the application of the Food Act in relation to allergen declarations, and to present a practical and consistent compliance and enforcement approach.

- **Food Act 2008 (WA) tool for local government: understanding allergen declarations**: provides some possible scenarios where undeclared allergens may occur and is designed to be used in conjunction with the guideline.

- **Authorised officer allergen declaration checklist**: designed to assist authorised officers in assessing compliance of food businesses with requirements under the Food Act.

Contacts

For contributions, enquiries or feedback regarding the newsletter please feel more than welcome to contact a member of the team.
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The food industry plays a major role in helping to manage food allergies; the resources below are aimed specifically at food businesses. Food Act authorised officers may find these useful to give out during assessments and other visits or refer businesses to these documents.

- **Food allergen declarations information for food businesses**: contains background information on food allergy, statutory requirements on identifying food allergens in their food; and practical suggestions on risk reduction strategies and managing risks.

- **Food allergy: creating safer food choices**: a leaflet for proprietors and food handlers containing basic information on food allergy and anaphylaxis, and the statutory requirements for food business to identify food allergens in their food.

In addition there are links to other sites that have further information regarding food allergens.

### Report on the Food Act 2010-2013

The Food Unit has prepared the **Report on the Food Act 2010 - 2013**. The report includes a comprehensive analysis of data received from Food Act enforcement agencies for the period 1 June 2010 to 30 July 2013, offering an insight into the progress of implementation of the Food Act over the three year period. Data includes number and qualifications of Food Act authorised officers, food business registration and assessment, compliance and enforcement activities, regulatory food safety auditing and food safety education and training.

### Food Unit Communication Strategy

In July 2014 we consulted with our stakeholders as part of the review of our communication strategy. The survey provided valuable feedback on the preferred methods of communication and information requirements of our stakeholders. The **Food Unit Communication Strategy** has now been finalised. The Communication Strategy outlines the Food Unit’s approach to stakeholder communication; details the Food Unit’s purpose, values, roles and responsibilities; and identifies our stakeholders and their role. The Strategy will assist to ensure that effective communication with our stakeholders is delivered to achieve our roles and responsibilities.

Details of our work priorities (such as upcoming events and release of publications) for the coming quarter will be published on the [Public Health website](#). During this current quarter we will be undertaking activities for Food Safety Week which will include a Food Act refresher workshop to discuss a range of food safety related matters including compliance and enforcement, labelling, regulatory food safety auditing, food-borne disease outbreak investigations and more. Further details will be released in the coming weeks.

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**Reminder: Food Act Section 121 Reporting 2013/14**

This year 75% of Food Act enforcement agencies submitted their 2013/14 Food Act report by the 31 August deadline; we would like to thank you for your timely response. Enforcement agencies that have yet to submit their reports should do so as soon as possible. Further information about Food Act Section 121 reporting requirements including the report submission form can be found on the [Public Health website](#).
Guidelines for the Environmental Health Investigation of a Food-borne Disease Outbreak

In Western Australia, the identification, investigation and control of a food-borne disease outbreak requires the coordination and sharing of information between various government agencies including:

- Local Government
- Department of Health (Food Unit)
- Department of Health (OzFoodNet) and
- Department of Health (Population Health Unit).

All government agencies often work simultaneously during a food-borne disease outbreak investigation collecting and sharing information to identify, investigate, control and prevent the continuance of an outbreak.

The Food Unit would like to take this opportunity to remind local government of the Department of Health Guidelines for the Environmental Health Investigation of a Food-borne Disease Outbreak

The Guidelines for the Environmental Health Investigation of a Food-borne Disease Outbreak (the Guidelines) has been developed to assist enforcement agency authorised officers in the investigation and control of a food-borne disease outbreak caused by biological agents. Specifically, the Guidelines provide authorised officers with step-by-step guidance: from the time the local government is notified of a known or suspected food-borne disease case to the onsite investigation and the implementation of preventative measures. The Guidelines clarify each agency’s roles and responsibilities (Section 2), the types of food-borne disease outbreaks and the local government notification process is outlined (Section 3). A comprehensive procedure for environmental health investigations is also outlined (Section 4). Examples of appropriate control measures for food-borne disease outbreaks are detailed (Section 5) as well as useful directions on the laboratory requirements for environmental health sampling and analysis (Section 6). In addition, information on the communication with external stakeholders (Section 7) and the contact details of relevant stakeholders are detailed (Section 8). The appendices contain supporting documentation such as technical advice, instructions and templates that may be useful during the investigation. The Guidelines can also be applied to the investigation of a single case food-borne disease incident.

The Guidelines also includes the Suspected Food Borne Disease Incident(s) Outbreak Assessment Form which has been developed to assist authorised officers in their food-borne disease outbreak investigations. This form is not a food safety assessment form, but rather a form to assist authorised officers in capturing and identifying evidence of past or present activities that may have contributed/are contributing to the suspected food-borne disease incident(s).
Western Australian food-borne disease outbreak investigations in 2013

In 2013, the WA Department of Health (Food Unit and OzFoodNet) together with local government environmental health officers (EHO) investigated 13 outbreaks of food-borne or suspected food-borne disease. Short descriptions of these outbreaks appear in the 2013 OzFoodNet quarterly reports. Most (11/13) of the outbreaks were linked to food businesses including six restaurants (caused by norovirus x1, Salmonella x 2, unconfirmed norovirus-like illness x 3), two commercial caterers (Listeria x 1 and norovirus x 1), one takeaway facility (Salmonella), one school (suspected food-borne toxin mediated) and one aged care facility (Clostridium perfringens). There were two outbreaks at private residences (caused by Salmonella and hepatitis A, respectively).

Outbreaks of note

1. Three cases of Listeria monocytogenes infection in elderly people who had purchased frozen meals from a food home delivery service were investigated in the 1st quarter of 2013. The investigation could not identify the specific food(s) causing the illness. However, a roast beef sample from the food business was L. monocytogenes positive but was a different type to that which caused the illnesses. The EHO worked with the food business to minimise the risk of Listeria contaminating food.

2. There were seven people with Salmonella Infantis infection who had eaten a range of foods (including Asian stir fry and sandwiches) purchased from the same lunch bar in April. Six food samples (egg salad, Thai beef salad and seafood salad, fried rice, coleslaw, rice salad) from the lunch bar were positive for S. Infantis. Due to poor compliance with the Food Act 2008 (WA) the food business was closed until compliance was achieved. The source of the Salmonella was not identified.

3. At least 12 people became ill with Salmonella Typhimurium infection after eating at the same cafe. Food eaten by cases included scrambled eggs, poached eggs, French toast and cake. The environmental health investigation found evidence of a raw egg sauce not under temperature control, undercooking of egg dishes and cross contamination. Egg and food samples were negative for Salmonella and the source of the contamination was not identified.

4. Eight people who had eaten at a hotel in December developed gastroenteritis and three were confirmed to have norovirus infection. Cases had eaten a variety of meals, with hot chips and a side salad common to all cases. On the days people had eaten at the hotel, three food handlers had gastroenteritis while working and had vomited in staff toilets. The EHO observed that many staff-members were overseas travellers and there was no official record of food handling training. An improvement notice was issued and the EHO discussed hand hygiene and food handling with staff. It is likely that one or more food handlers with norovirus infection had contaminated foods that were subsequently eaten by hotel patrons.

The investigations in 2013 highlight the importance of joint investigations and collaboration between the Department of Health and local government to successfully identify and investigate outbreaks and implement public health action to halt transmission and prevent future outbreaks.
Hand washing facilities – best practice approach

Minimum legislative requirements for hand washing facilities in food premises are stipulated in clause 14 of Standard 3.2.3 and clause 17 of Standard 3.2.2 of the Australia New Zealand Food Standards Code (the Code).

It is sometimes evident during food safety assessments that the food business views the hand washing facility as a token fixture that is there because it is required under the Code. Often the design and maintenance of the basin does not promote effective hand washing, including it being inadequately sized, fitted with a standard domestic flick mix tap and there being a long delay in the water becoming warm. Some may consider this a minor issue, however the reality is such inadequate facilities very quickly become the Achilles heel of the food business as food handlers may find the use of the hand washing facility difficult and time consuming. The lack of an adequately sized, user friendly facility may lead to non-compliance with Standard 3.2.2 clause 15 (2), (3) and (4), and potentially cross-contamination and food-borne illness. Size does matter and a general guidance (as provided in Safe Food Australia) is for the basin to have an 11 litre capacity which allows for easy hand access under the water outlet and is sufficient for any splash catchment.

The question of hands-free taps or otherwise is not specified in the Code; however it would be considered best practice to ensure that the same tap does not have to be touched by dirty hands before hand washing, and clean hands after hand washing. This could increase the likelihood of cross-contamination. Whenever a hand wash facility is being replaced, a food premises is being refurbished or a new food premises is being built, the food business should be encouraged to install hands free taps to alleviate the potential point of cross contamination. There a several hands free tap designs available including thigh activated, knee activated, electronic activated and a once only push down activated system. It should however be noted that hands-free taps and basin size dimensions/capacity are not stipulated in the Code and therefore cannot be enforced. However, food businesses may take other measures to achieve compliance.

Staff movements

The Food Unit would like to farewell Marilyn Macfarlane who is retiring after more than ten years of service during both the nineties and the ‘noughties’. Marilyn played an instrumental role with the implementation of the Food Act 2008 (WA) by developing regulations, policies and other supporting materials. Marilyn’s experience, both in the UK and Australia, has been invaluable to the Food Unit and we wish her well with her future endeavours.

If you have any comments or suggestions, or would like to make a contribution to the next edition of the Food for Thought newsletter, please contact the Food Unit at foodunit@health.wa.gov.au or phone (08) 9388 4999.