



ENVIRONMENTAL  
HEALTH  
AUSTRALIA

***Report on the EHA (SA) Incorporated Position  
on a Food Safety Rating Program for SA***

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Final

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## 1. Introduction

This report outlines the Environmental Health Australia (EHA) SA Incorporated Position on the introduction of a Food Safety Rating Program (FSRP) in South Australia. The report has been prepared by the EHA (SA) Inc. Board for the 'SA Health and LGA MOU Work Plan Working Group'.

In South Australia there has been a history of political debate regarding the publication of information regarding poor performing food premises. Currently, successful prosecutions under the Food Act 2001 are published on the SA Health website. In conjunction with various work plans to under the Food Act 2001, the 'SA Health and LGA MOU Work Plan Working Group', is currently examining the implementation of a FSRP, that would provide further information to the public on the outcomes of food business inspections.

The views outlined in this report represent the position of the EHA (SA) Board on a FSRP and do not necessarily reflect the views of local government. This paper has been prepared in consultation with the EHA Food Safety Special Interest Group (SIG) and EHA (SA) members. The scope of this paper did not incorporate an extensive literature review into the benefits and pitfalls of a FSRP, however we have incorporated some research references which provide further information relevant to the views expressed by EHA (SA). EHA (SA) welcomes further input on the specific details of a FSRP as State Government proposals and/or policies are provided for consultation.

### 1.1 About Environmental Health Australia

Environmental Health Australia (EHA) is the peak body representing Environmental Health Officers (EHOs). EHOs are Authorised Officers under the South Australian Food Act and carry out food safety surveillance, education and enforcement.

The mission of EHA (SA) Inc. is to provide a sustainable and effective framework to empower an active and professional membership in South Australia. The organisation is committed to professional development and the enhancement of environmental health standards and services to the community. The Food Safety SIG (of EHA SA), is the key forum for networking, information sharing and policy discussions regarding Food Safety.

### 1.2 Our Understanding of a Food Safety Rating Program

EHA (SA) has prepared this position paper in the absence of viewing a State Government proposal on the specific nature of a statewide FSRP. EHA (SA) has therefore based these views on our knowledge of FSRPs implemented interstate and overseas, as well as voluntary programs currently being used by the City of Salisbury<sup>1</sup> and the City of Charles Sturt in SA. A number of overseas authorities, including the Food Standards Agency in the United Kingdom, have developed an innovative approach to the food inspection process and implemented a rating program called 'Scores on Doors'.

For the purpose of this paper, our broad understanding of a FSRP, is that it is ‘a scaled rating system aimed at assisting and encouraging businesses to meet, not only the minimum food safety standards, but to encourage the implementation of food safety management systems and best practice food hygiene and safety’. The rating of each premise would be determined by authorized officers under the Food Act 2001, based on the outcome of a food business inspection and the demonstrated level of understanding and application of food standards by that business. The rating achieved by the business would be publically displayed, so that consumers may make informed purchasing choices.

## 2. Discussion

EHA (SA) appreciates the potential benefits of the implementation of a centrally coordinated FSRP in SA. EHA (SA) considers that potential benefits include: public health improvements; potential promotional benefits for food businesses; and improved transparency for consumers.<sup>2-6</sup> However, EHA (SA) is of the view that the successful implementation of a rating program will rely on the concurrent implementation of other improvements to food safety regulation in SA, such as the mandating of training for food handlers. A successful statewide program will also require tools and training for EHOs to ensure consistency and the effective resourcing of Local and State Government public and environmental health authorities (such as SA Health).

This discussion paper outlines the EHA (SA)’s views on the potential benefits of a FSRP, possible issues and considerations for the effective implementation of a FSRP.

### 2.1 Potential Benefits of a FSRP

EHA (SA) considers that there are various benefits to the implementation of a FSRP, which are outlined below.

#### Public Health Standards

There are examples highlighted, in the literature on FSRP approaches which have resulted in improved food hygiene standards and compliance.<sup>2-6</sup> Jin and Leslie (2005), highlight that the success of ‘hygiene inspection grade cards’ used in Los Angeles, in improving public health outcomes. A review of a disclosure scheme for food hygiene inspections in Toronto concluded that there had been ‘increased compliance and continuous improvement in food safety’ as a result of the programme.<sup>5</sup>

As reported by Worsfold et al (2007), in the United Kingdom, ‘the Chartered Institute of Environment Health and many environmental health practitioners have expressed the view that consumer information drives up hygiene standards, with low-scoring businesses seeking to raise standards in order not to lose market share’.<sup>6</sup>

EHA (SA) considers that a FSRP would potentially improve public health standards and therefore decrease food contamination and thus food-borne illness. However, we advocate that further literature review research be undertaken to assess the effectiveness of existing programs at improving public health standards.

### **Consumer Confidence and Transparency**

EHA (SA) supports a system which increases consumer confidence and enables the public to make informed choices about where they eat based on hygiene standards. A FSRP would increase public awareness of food safety and offer an effective approach to providing the public with information on food business performance. EHA (SA) considers that a FSRP would potentially relieve the current 'Freedom of Information process', which is cumbersome and lacks context and parity between businesses and across local government areas.

### **Food Business Benefits**

A FSRP would offer a positive incentive for food businesses to address compliance with food safety standards and work towards food safety systems. It would positively promote those businesses that comply with standards and are committed to a high level of food hygiene.

### **Professional Benefits**

A FSRP would positively promote the role of the environmental health profession and public health services undertaken by local government. We consider that it would further raise the profile of the importance of hygiene standards and food safety. There is also the additional advantage of relationship building between food businesses and the authorized agency as businesses aim to improve their understanding of hygiene requirements and engage in the assessment process. Although tension between food businesses and EHOs in small communities is a potential concern with a FSRP.

## **2.2 Potential Issues and Considerations for an Effective FSRP**

Despite the obvious benefits of a FSRP, EHA (SA) is of the view that there are potential issues and complications that would need to be carefully considered in developing the details of a FSRP. Potential issues are summarised below.

### **Resources**

A FSRP would have resourcing implications to local and State government environmental health sections. EHA (SA) members, who work in rural and regional Councils, have raised concerns regarding their capacity to administer a FSRP, especially as they are limited in time and resources to meet all of the requirements of other public health legislation.

A FSRP, is likely to require additional resources to that already allocated to food enforcement activities. Additional resources are likely to be required in the areas of:

- Improving the system for registration and licensing of food businesses (to prevent gaps in the FSRP).
- Training and education of EHOs.

- Training and education of food businesses on the system, including where English is a second language.
- Improvements to the transparency of inspection sheets, particularly if they are to be publically displayed or readily available to customers.
- Requirements for translation of information and provision of information in various languages.
- Meeting inspection schedules and frequencies.

Adequate allocation of resources towards the above requirements, would improve existing enforcement approaches as we potentially work towards a FSRP. However, meeting these resourcing requirements is a challenge due to Environmental Health workforce shortage issues.<sup>8</sup>

EHA (SA) considers that a FSRP needs to be 'centrally coordinated' with sufficient resources allocated to promotional and assessment tools. Independent assistance may also be necessary for EHOs in rural areas.

Consideration needs to be given to the type of inspection that can be used for rating purposes - scheduled or unscheduled. Adequate environmental health resources will also be fundamental to ensuring that inspection frequency targets are met.

Adequate workforce capacity will be important in meeting the requirements of expanding EHO functions and ensuring that there is not a shortage of suitably qualified and experienced EHOs to administer a FSRP.

### **Consideration of Equity for Businesses**

A FSRP could have detrimental effects on those food businesses that receive a lower rating. Loss of income to local businesses may result in decreased employment and may conflict with Council goals of promoting and encouraging businesses within their area. EHA (SA) considers that the FSRP must ensure that the assessment of premise standards is robust and based on visual observation and validation of practices by trained EHOs.

The limitations of the assessment need to be transparent to the public (for example, the assessment is based on standards and practices observed during a food premises assessment as well as evidence of business procedures). The system also needs to allow for renewal of the rating when a business changes hands. For this to be effective, EHA (SA) considers that an improved food business registration system is required.

The impact of customer complaints on the FSRP needs to be considered and understood by the public. Complaints received may be unfounded or without sufficient evidence. Whilst Councils would continue to investigate complaints, they should only impact on the rating if sufficiently validated by the Council.

To develop a robust FSRP, EHA (SA) supports thorough consultation with the food industry in SA on a proposed scheme.

### **Liability to Enforcement Agencies**

There are potential liability issues for local government, in particular where Councils are publically promoting the degree of premises compliance and hence influencing consumer choices. These issues should be explored through consultation with local government to ensure mutual liability insurance (and, if necessary, legislation) continues to protect EHOs.

### **Potential Inconsistency in the Assessment**

Potential for inconsistency in the assessment of Food Safety Standards, between EHOs and enforcement agencies, needs to be minimized. To ensure the effectiveness of current enforcement approaches and the potential implementation of a FSRP, measures to support consistent assessment approaches are needed, such as:

- A more effective food business registration and licensing system that reliably captures all food businesses and changes in business ownership to ensure that authorities can be fair and equitable in the treatment of businesses in their jurisdiction.
- Support for continued EHO training on the Food Safety Standards and their interpretation.
- The development of enhanced consistent enforcement policies across the profession (some work has progressed on this already through the LGA/EHA EHO knowledge base).
- Clear guidelines and training on a FSRP assessment tool.
- Technical support for EHOs as required.

EHA (SA) also proposes that a rating scheme be applied in a uniform manner across and within all authorized bodies, including Biosecurity SA and the Australian Quarantine and Inspection Service, as well as SA Health and local Councils. This will be important for ensuring consistent applicability of the scheme across premises that have various components eg. retail, meat processing, export.

## **2.3 Training – A Key Requirement for an Effective FSRP**

A FSRP has potential to raise awareness on food safety and hygiene across businesses and consumers. EHA (SA) considers that the availability of training and educational materials for a wide range of food business types, is necessary to support an effective FSRP. The introduction of mandatory food hygiene training for food handlers would allow businesses to improve their practices and ensure that businesses are better informed of their legislative obligations.

The increasing diversity of cultures in the SA food industry necessitates training and educational materials to be available in a range of languages. EHA (SA) considers that access to such educational resources in a range of languages would be useful to support EHOs in the field of training businesses on current Food Safety Standards requirements and the implementation of a FSRP.

### 3. Conclusion

EHA (SA) considers that the introduction of a compulsory, uniform and 'centrally coordinated' FSRP in SA would have many benefits, most importantly it would encourage improved food safety standards and potentially reduce foodborne illness. EHA (SA) supports the introduction of a statewide FSRP that improves consumer confidence in the food industry. However, it is crucial that a FSRP is robust and delivered in a fair and equitable manner, through availability of training and education for businesses, and with adequate resources to support Council Environmental Health sections. As we work towards a FSRP, EHA advocates for continued improvements to the current food safety enforcement approach in the State, including:

- A more robust system for the maintenance of food business details (refer to the EHA (SA) position paper entitled 'Notification vs Registration');
- the introduction of mandatory training for food handlers;
- professional training and consistent assessment tools for use by EHOs (to minimise inconsistencies in the assessment of food hygiene standards)); and
- improving accessibility to educational materials for food businesses (through a variety of media and languages).

Without these requirements and resources being met, EHA (SA) considers that there are likely to be issues with the FSRP delivery.

EHA (SA) supports consultation with local government, the food industry and consumer bodies in developing an effective FSRP. EHA (SA) will also consider the effectiveness of existing voluntary programs such as the City of Salisbury trial FSRP and the City of Charles Sturt 'Deliciously Safe' scheme.

### References

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