

## **Food Safety Tips, Common CARs and FAQs**



The introduction of the NSW Food Authority auditing of the vulnerable persons food safety scheme FSANZ 3.3.1 has required all aged care facilities providing food service to vulnerable persons to implement a Food Safety Program (FSP) based on the principles of HACCP (Hazard Analysis and Critical Control Points). A review of a sample of member audit reports identified some common issues and corrective action requests (CARs). To assist members the ACS Food Safety Consultancy Team has put together the following Food Safety Tips, Common CARs and FAQs.

### **How to Prepare for an Audit**

Be prepared. Have all documents ready for the auditor to review. Be confident to discuss issues raised by the auditor; Prepare staff for auditor to ask questions. It is to validate what is written in the FSP (food safety program). Staff will need to be able explain their processes. The auditor may ask questions and observe a procedure. For example, Do you puree/texture modify foods? How do you do it, what equipment do you use, do you take any temperatures of these foods, do you cool down any foods if so what? how? OR How do you sanitize fresh produce? Where is it done? How do you do it? How long do you keep it?

The auditor may ask for the following documents:

#### Menus

**The auditor is looking for high risk foods and control measures that the facility has in place e.g. sanitizing fresh produce, are eggs used if so how are they cooked.**

#### Approved supplier list and documents/HACCP certificates etc

**The auditor is looking for high risk foods, control measures and listeria management of RTE high risk foods. They are also looking to verify that you have the documents in accordance with the approved supplier policy as per the FSP.**

#### Pest control reports/service dockets

**The auditor will be looking at frequency, outstanding and ongoing pest control problems, bait station maps, types of chemicals used including are they safe to use in food areas (letter from contactor stating or AQIS approval certificate), MSDS sheets.**

#### Maintenance logs / servicing dockets/Preventative maintenance calendar

**The auditor is looking for the reporting process, ongoing problems, turn around time of repair etc**

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### Chemical Contractor MSDS and Service Dockets

The auditor is looking for current MSDS sheets and evidence that chemicals are food grade (letter from supplier or AQIS Approval Certificate). The service dockets will also evidence dishwasher maintenance and dishwasher temperature checks.

### Calibration Records

The auditor is looking for both hand held probe and fixed gauges such as cool rooms calibration. Hand held probes that are used for hot and cold temperature monitoring need to have both ice and boiling point calibration.

### Food Safety Program Documents

The auditor is looking at currency, do the documents match those in use in kitchen, are you doing what you say you are doing e.g. maintenance procedures, current Approved Supplier Program list (ASP) current HACCP certificates, preliminary steps e.g. have all hazards been identified are the CCP's appropriate are the control measures appropriate are the Critical limits correct (CL) how the documents are managed e.g. old monitoring forms in use.

### Monitoring / records for up to the previous 12 months

All CCP's receipt, storage, preparation sanitation records, food temperatures (cooking, cooling or chilling, reheating, hot holding, service / delivery), appliance temperatures e.g. dishwasher, cool room and freezers. The auditor is looking for temperatures and corrective actions.

### Internal / External Audits

The auditor is looking for verification activities. Evidence that the monitoring records are reviewed, the entire FSP is reviewed at least annually, and verification of the support programs e.g. Maintenance, cleaning, pest control, food handling hygiene, etc

### Illness Records

A document is in place to record staff illness that has the potential to lead to food borne illness.

### Training Records / Orientation Induction Handbook

The auditor is looking for evidence of training attendance for Food handlers. This can also include chemical safety, induction buddy system and any kitchen related competencies e.g. how to clean slicers, hand washing competencies etc. *However, staff knowledge and skills can be verified through the internal audit system and observations during the audit.*

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### Complaints

**The auditor is looking for complaints related to possible food safety issues.**

### HACCP Team Meeting Minutes

**The auditor is looking for evidence of feedback and review. These may be separate meetings or incorporated into existing meetings e.g. CQI.**

## **Common CARs**

### Sanitation

The Vulnerable Person Food Safety Scheme manual page 5 of 26 provides guidelines on the sanitation of fresh produce. If alternative chemicals are used e.g. a Ph product this must be validated with documentation to show that it is equivalent in effect to the NSW Food Authority guide lines. Facilities must **provide evidence that:**

- **Commercially available fruit and vegetables sanitizer is used. The chemical supplier will provide evidence of the food grade chemical and validated chemical preparation requirements.**
- **Only clean, undamaged, fresh produce will be purchased. The fruit and vegetables are stored in the cool room.**
- **A single sink or alternative (bucket) is designated for the washing and sanitizing of fresh produce. The sink is labeled as such.**
- **Fruit and vegetables are washed thoroughly in clean water, to remove all excess dirt, prior to sanitation.**
- **The temperature of the wash water and sanitizing water is slightly warmer (5-10°C) than the produce (<5°C) to prevent water being sucked into the fruit / vegetable.**
- **A dispensing system is installed to ensure appropriate chemical concentration of 100 ppm chlorine. Alternatively, staff have received training of appropriate chemical mixing procedure.**
- **Test strips are used at each sanitizing process to ensure accurate chemical concentration is achieved.**
- **The washed produce is added to the chlorine solution and agitated to ensure all surfaces are wet and there are no bubbles. The produce is soaked for 5 minutes or in accordance with supplier directions.**
- **Do not rinse the produce. The produce is used within 24 hours of sanitizing.**

*Example CAR: No documentation e.g. monitoring records for validation of PPM or contact time for sanitizer.*

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### Calibration

Facilities need evidence of calibration of hand held and fixed gauges. This will include frequency, method of calibration e.g. ice or boiling, identification of pieces of equipment, date of calibration, error. Further information is available in the Vulnerable Person Food Safety Scheme manual page 8 of 9.

**Once a hand-held thermometer has been calibrated, it can be used to check the accuracy of temperature gauges in the cool room and freezers. This should be done at least every 6 months.**

*Example CAR: no boiling point calibration of hand held probes.*

### Menu and high risk foods and Allergens

Facilities need to ensure they have assessed the hazards associated with the service of high risk food and the control measures that are in place for the service of high risk foods. Potentially high risk foods for vulnerable populations that are included on the menu are subjected to control measures to decrease the risk of food contamination.

**Control measures include: Chemical sanitation, Heat treatment (Cooking procedures such that core temperatures reach >75°C) e.g. Eggs are cooked until white and yolk are solid, Purchase from approved suppliers e.g. High risk foods will only be purchased from HACCP certified approved suppliers. Salads will be prepared fresh daily on site.**

**The FSP must also identify hazards associated with allergens including traceability and resident allergy process and procedures.**

*Example CAR: date label put over allergen statement.*

*Example CAR: Resident allergies not documented on assessment diet cards.*

*Example CAR: ASP purchase of high risk processed meat products do not have HACCP certification.*

### Storage times for high risk foods

The NSW food authority recommends that the storage times for potentially hazardous foods e.g. eggs, frozen defrosted meats, coleslaw, opened tinned products, ham, sandwich fillings such as mashed egg, salmon are not kept longer than 24 hours. This storage time also applies to cooked processed meats such as left over chicken roast meats that are cooled for later use.

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*Example CAR: Processed meats stored >24 hours.*

### Vulnerable Persons Food Safety Scheme Manual

Download a copy of the Vulnerable Person Food Safety Scheme manual, review your procedures and FSP in line with the manual. Note and highlight the **MUST** parts of the document and the **SHOULD** parts for compliance. The manual has excellent resources that can be used such as an annual review/ audit appendix 6.

### Food Safety Program tips

Know what your facilities processes. Do you produce cook serve foods, short life cook chill, do you chill/cool foods down to use at a later time? Ensure all Critical Control Point's (CCPs) are documented and monitored for example a cook chill production will have additional Critical Control Points' and different critical limits when compared with a cook serve production.

In general the following are common critical control points/steps;

- Receipt temperature for high risk foods
- Storage temperature (Cool room & freezers) Note. Storage temperature for foods chilled for later use should be 3<sup>o</sup> C
- Preparation (Time and temperature of salads / sandwiches before & after preparation)
- Sanitizing fresh produce (Concentration)
- Cooking core temperature
- Post cook processing (e.g. Temperature at the end of puree process)
- Cooling time and temperatures
- Reheating & hot/cold holding temperatures
- Service temperatures
- Dishwasher rinse cycle temperature

For each of the steps you must document, monitor and understand what the **potential hazards** are.

For each of the steps you must document, monitor and understand what the **control measures** are.

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For each of the steps you must document, monitor and understand what the **critical limits** are.

For each of the steps you must document, monitor and understand what the **corrective action** is.

*Example CAR: Incorrect critical limits documented e.g. 50 ppm for sanitizer*

*Example CAR: inappropriate corrective action documented*

*Example CAR: Incorrect critical limits - storage temperatures documented for cook chill products*

### **Ensure the Preliminary Steps Are Documented in the FSP**

1. Food safety / HACCP Team
2. Scope and purpose
3. Product descriptions and intended use include consumer
4. Flow charts
5. Hazard analysis and hazard control tables

*Example CAR: Product descriptions do not cover range of food types*

*Example CAR: Flow chart does not identify sanitizing fruit and vegetables*

*Example CAR: Hazard analysis and control table does not identify correct critical limit for chilling of cook chill foods*

*Example CAR: Product descriptions do not identify consumer/s*

### **Annual Review of Entire System**

A review must be conducted at least annually this includes the written FSP document and process and food handling operations.

Example CAR: No evidence of verification activities

Example CAR: No annual review of FSP conducted for 2009

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### **Support Programs**

The NSW Food Authority vulnerable person's manual states that the facility must list the following support programs as part of the FSP.

1. Maintenance
2. Approved Supplier
3. Cleaning and sanitation
4. Pest Control
5. Personal Hygiene / health
6. Staff training
7. Calibration
8. Product recall
9. Internal audit
10. Good Handling Practices (labeling policy, thawing, storage, texture modified meals etc)
11. Document and data control
12. Menu design

Common issues with Support Programs' are supporting documentation;

- Pest and chemical suppliers providing evidence that chemicals use are safe to use in food areas.
- Current bait station maps to identify baits and chemicals in use.
- Recall programs not covering the sale of food outside of the facility e.g. meals on wheels, CACPs packages, self care/retirement residents.
- Good Handling Practices not covering thawing and labeling guidelines.
- Cleaning guidelines for specific types of equipment e.g. robot coupe, blenders, meat slicers.

ACS can provide short term and long term Consultancy support for your organisation including annual refresher training in Food Safety for Food handlers, annual internal review/audit of entire production system to meet the requirements of the NSW food authority guidelines, development and implementation of food safety programs and support to overturn corrective action requests and failed audits. Please contact ACS for further information on 02 87540400.