

# GUIDANCE ON AUDITS



Department of  
Primary Industries  
Food Authority

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## Introduction

Audits are conducted for businesses with a licence from the NSW Food Authority. An audit assesses a business's Food Safety Program (FSP) and compliance with the program, as well as any other requirements of the relevant Food Safety Scheme (Scheme) set out in the Food Regulation. This guidance document provides information on the ratings that may be applied to non-conformances when raised as Corrective Action Requests (CAR) during audits.

The aim of this document is to provide authorised auditors with a consistent approach that can be used when conducting audits at licensed food businesses. This guidance document can also be used by food businesses to understand the compliance audit model process, why defects are identified during audits, and their impact on food safety.

This guidance is based on the requirements of the Food Regulation 2015, Australian New Zealand Food Standards Code (the Code) and industry specific standards identified below:

### **Meat transport vehicles, abattoirs, meat processors**

[AS 4696-2007 - Hygienic Production and Transportation of Meat and Meat Products for Human Consumption](#)

[AS 4465-2006 - Construction of Premises and Hygienic Production of Poultry Meat for Human Consumption](#)

### **Retail meat premises**

[NSW Standard for Construction and Hygienic Operation of Retail Meat Premises](#)

### **Dairy processing facilities –pasteurisation**

[AS 3993-2003 - Equipment for the pasteurization of milk and other liquid dairy products – Continuous-flow systems](#)

[ANZDAC – Australian Manual for the Validation and Verification of Heat Treatment Equipment and Processes](#)

### **Shellfish**

[NSW Shellfish Industry Manual](#)

This *Guidance for Audits* document does not provide industry specific guidance for a number of industries regulated by the Food Authority, including game meat business, knackeries, wild shellfish harvesters, food transportation, or primary production business such as dairy, egg, and poultry.

Table 6 below contains guidance which will be used across common elements for all Schemes. The following tables contain industry specific guidance on requirements and issues specific to each Scheme.

Table 7. Meat processing facilities

Table 8. Department of Agriculture specific – meat

Table 9. Dairy processing

Table 10. Department of Agriculture specific – dairy

Table 11. Vulnerable populations

Table 12. Seafood processing

Table 13. Shellfish harvesting



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## What is an audit?

An audit is a process where an authorised auditor visits a facility to assess food safety compliance. During the audit the auditor carries out an inspection of the facility, observes the food handling practices, and reviews food safety documentation (including the food safety program and monitoring).

## Who carries out an audit?

Audits carried out on licensed business will be carried out by an authorised auditor (authorised by the *Food Act 2003*). Authorised auditors may be contracted to carry out audits on behalf of the Food Authority ([Third Party Auditors](#)), or may be employees of the Food Authority. Food Authority employed auditors are also authorised officers under the *Food Act 2003*, and can carry out the functions of an authorised auditor and authorised officer concurrently. Food Authority employed auditors carrying out audits of export registered establishments are also authorised officers under the *Export Control Act 1982*.

## What is in the audit?

During an audit, the auditor will check that:

- there is a food safety program
- all food handling operations have been analysed to identify any critical food safety hazards and procedures are in place to control those hazards
- there are descriptions of all products handled by the business
- there are work instructions and procedures
- there are monitoring forms
- the business has a maintenance and construction process in place for structural issues which may pose food safety risks
- the business has designated supervisors and workers responsible for specific jobs, there is a good manufacturing process – including hygiene, chemical storage, pest control, training, product recall, internal review and customer complaint handling procedures
- the food business is complying with their food safety program and any relevant legislative requirements.

## Rating non-conformances

The auditor has a list of areas that have to be checked. If an area is not of an acceptable standard, the auditor will raise a Corrective Action Request (CAR). Photos are taken as evidence for CARs as well as other general photos. Each CAR is rated and has points allocated to it. The number of points allocated will depend on whether the officer rates the element to be 'critical', 'major' or 'minor'. The points allocated for each of the categories are:

- **Critical defect – 64 points**

A critical defect means a failure to:

- a) Comply with the requirements of Codes of Practice or a Standard that is very likely to result in, or has resulted in, the production of unwholesome food; or
- b) Comply with the requirements of the Standards with regard to labelling or the trade description of food; or
- c) Comply with corrective action request for a major non-conformance within the stated time.



Defects that fall into this category include:

- A severe breakdown in sanitation procedures
- Waste facilities contaminating food, water or equipment
- Use of water (including steam or ice) which is not potable in food handling areas
- Serious pest infestation
- Processed food submitted for sale that does not comply with product standards
- A breakdown in procedures specified in documentation or any non-compliance which will compromise the safety or wholesomeness of the food.

- **Major defect – 8 points**

A major defect means a failure to comply with the requirements of a Standard, Code of Practice and/or legislative requirements that is likely to result in the production of unwholesome food or inaccurately labelled food but is not a critical defect. Defects that fall into this category include:

- Ineffective pest control, inadequate cleaning program
- Major non-compliance with established hygiene standards
- Inadequate control of food or ingredients during preparation or processing
- Variation from the procedures documented, inaccurate calibration procedures
- Another defect which could compromise wholesomeness of processed food or result in inaccurately labelled food

- **Minor defect – 2 points**

A minor defect means a failure to comply with the requirements of a Standards or a Code of Practice referred to in legislation that could result in the production of unwholesome food or inaccurately labelled food but is not a major or critical defect.

When deciding what rating to apply to a non-conformance, an auditor will take into account a number of factors:

- The degree of food safety risk of the non-conformance; including food types, business size and distribution, consumer of the food (general or vulnerable population).
- The overall standard of the facility, the food safety systems, and food safety culture of the business.
- Overall compliance and non-conformance history of the business e.g. is it a recurring issue.
- The business's ability and attitude to taking corrective action in response to the non-conformance.

### **CAR Escalation**

If a business fails to rectify any CAR or defect identified during an audit by the required timeframe, or the same issue is observed by an auditor at two consecutive audits, the CAR rating may be escalated. This means a minor



will be escalated to a major, or a major escalated to a critical. If the failure to implement effective corrective actions is threatening food safety, auditors will use discretion and may escalate an issue directly to the critical category.

In addition, a further CAR or defect may be considered for inadequate corrective action, as the business has failed to implement effective corrective actions to rectify the original issue, or prevent it from recurring.

The tables below are guidelines for audits, based on existing knowledge and data, and are typically the main areas of risk to be aware of. It should be noted that these are guidelines only and intended to be used in conjunction with other available resources and the professional judgement and knowledge of the auditor.

### How is the audit outcome determined?

At the conclusion of the audit, the allocated points are added to give a total rating for the business, from an 'A' to an 'E' rating (shown in Table 1).

**Table 1. Audit rating**

Rating	Total number of allocated points	Audit result
A	0 – 15	ACCEPTABLE
B	16 – 31	ACCEPTABLE
C	32 – 47	MARGINAL
D	48 – 63	UNACCEPTABLE
E	64 and above	UNACCEPTABLE

### How often are routine audits if the business achieves an acceptable audit?

Existing licensed business have regular audits carried out based on the compliance audit model. New businesses are audited based on the licensing audit model, where audits are carried out at a higher frequency to ensure that all new licensees can demonstrate long-term compliance with legislative requirements. Further information about the licensing audit model can be found on the Food Authority website.

The frequency of audits under the compliance audit model will depend upon the type of business (a Priority 1 or 2 businesses) and the rating received at last audit. More information on [Priority Classifications of food businesses](#) can be found on the Food Authority website.

**Table 2. Compliance audit frequency**

Rating	Priority 1	Priority 2
A	12 months *	24 months **
B	6 months	12 months
C	3 months	6 months

\*6 months for Export Registered Establishments

\*\*12 months for Export Registered Establishments



Table 3. Unacceptable audit frequency

Rating	Follow up audit(s)	Unacceptable follow up audit	Acceptable follow up audit
D or E	1 month	Remain on 1 monthly audits and additional enforcement action	Return to original audit schedule (prior to initial D or E rated audit)

Table 4. Recommended enforcement action

Rating	Enforcement Action
A	The Food Authority will implement appropriate enforcement actions to control food safety risks. Possible enforcement actions are outlined in the following section
B	
C	
D	
E	

### Unacceptable audit outcome

If critical non-conformances are identified during an audit, the auditor will record an unacceptable audit outcome and will obtain evidence such as photos, samples and recordings (interview) in order to implement appropriate enforcement action.

Enforcement action will be taken by an authorised officer, in accordance with [Compliance and Enforcement Policy](#). This may include, but is not limited to the following;

A verbal or written warning – the business is warned that further non-conformance may result in further enforcement action being taken

- An Improvement Notice - the business is given a period of time to fix a non-conformance before an authorised officer returns to check that the issue has been addressed and is compliant. The time-frame is determined by the authorised officer based on the food safety risks posed by the non-conformance and the expected time taken to rectify the issue. Time-frames can range from 24 hours up to 12 months. If the non-conformance/s is/are not rectified within the specified time-frame, the authorised officer can issue a Penalty Notice and/or a Prohibition Order (see below). A fee of \$330 is attached to all Improvement Notices to cover the expense of conducting a follow-up inspection to ensure the non-compliance has been rectified. Any additional inspections that may be required to verify compliance with an Improvement Notice will attract further costs.
- A Penalty Notice – the business is given a fine for the non-conformance identified during the audit. Fines range in severity depending on the nature of the offence and multiple fines may be issued. Fines are normally issued



in conjunction with other enforcement actions to ensure that long term compliance with food safety standards is achieved. The business can also be placed on the Name & Shame register which is published on the Food Authority website.

- A Prohibition Order- this can be issued on a business where serious non-conformances are identified. This order means that the business cannot operate at all, produce a specific type of food, use a specific process, or use certain equipment, for a period of time. The time period can range from 24 hours, up to permanent prohibition from operating.
- Prosecution – the Food Authority will commence legal proceedings against a business for continued failure to comply with food safety standards and/or failure to produce safe and suitable food. The business can also be placed on the Name & Shame register which is published on the Food Authority website.

If a business records an unacceptable audit outcome, the Food Authority will conduct further audits, at full cost, until all food safety risks have been controlled and all enforcement actions have been successfully completed. The frequency of audits will be maintained at an appropriate level until the business is able to demonstrate their continued commitment to food safety and their ability to produce safe and suitable food.



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## Acronyms

AA – Approved Arrangement

AO – Authorised Officer

AQL – Acceptable Quality Level

AS – Australian Standard

AW – Animal Welfare

AWO – Animal Welfare Officer

CAR – Corrective Action Request

CPU – Central Processing Unit

DoAW – Commonwealth Department of Agriculture and Water Resources

ERP – Extended Residue Program

EU – European Union

FSC – Food Standards Code

FSO – Food Safety Officers

FSP – Food Safety Program

FSSM – NSW Food Safety Schemes Manual

MAP – Modified Atmosphere Packaging

GMP – Good Manufacturing Practice

HTST – High Temperature Short Time

ID – Identification

MHA – Meat Hygiene Assessment

MICoR – Manual of Imported Country Requirements

MTC – Meat Transfer Certificate

NATA – National Association of Testing Authorities

NLIS – National Livestock Identification System

NSW – New South Wales

NVD – National Vendor Declaration

PGOs – Prescribed Goods Orders

PR – Product Record

RFP – Request For Permit

PHF – Potentially Hazardous Food

RTD – Resistance Temperature Detectors

RTE – Ready-to-eat

SO<sub>2</sub> – Sulphur dioxide (and derivatives)

SRO – Sydney Rock Oyster

TC – Transfer Certificate

TD – Transfer Declaration

UCFM – Uncooked Comminuted Fermented Meat

UV – Ultra Violet

VP – Vulnerable Populations



Table 5. Audit guidelines – Key areas considered during an audit

Facility	Key areas to consider
Abattoir	<ul style="list-style-type: none"> <li>• Legal Requirement: AS4696 Red Meat, AS4465 Poultry, AS4466 Rabbit, plus Animal Welfare.</li> <li>• Food Safety Program: Yes, drafted by business.</li> <li>• Food Safety Controls: <ul style="list-style-type: none"> <li>○ Carcase chilling (refer to relevant Australian Standard).</li> <li>○ Temperatures: <ul style="list-style-type: none"> <li>▪ Carcases no warmer than 7°C on surface.</li> <li>▪ Carcase parts no warmer than 5°C at site of micro concern.</li> <li>▪ During processing surface temp warmer than 7°C, or carried out in environment no warmer than 10°C.</li> </ul> </li> <li>○ Washing and chilling temperatures and residual chlorine in spin chillers (poultry).</li> <li>○ Meat inspection.</li> <li>○ Traceability (e.g. NLIS for red meat).</li> </ul> </li> <li>• Testing: <ul style="list-style-type: none"> <li>○ All – Water, as per FSSM.</li> <li>○ Verification: <ul style="list-style-type: none"> <li>▪ Red meat – Carcase swabbing.</li> <li>▪ Poultry – Work surfaces (as part of Australian Standard) &amp; carcase swabbing.</li> </ul> </li> </ul> </li> </ul>
Meat Processor	<ul style="list-style-type: none"> <li>• Legal Requirement: AS4696 Red Meat, AS4465 Poultry.</li> <li>• Food Safety Program; Yes, drafted by business.</li> <li>• Food Safety Controls: <ul style="list-style-type: none"> <li>○ Temperatures: <ul style="list-style-type: none"> <li>▪ Carcases no warmer than 7°C on surface.</li> <li>▪ Carcase parts no warmer than 5°C at site of micro concern.</li> <li>▪ During processing surface temp warmer than 7°C, or carried out in environment no warmer than 10°C.</li> <li>▪ Cooking, 65°C for 10 minutes (or equivalent).</li> <li>▪ Cooling: <ul style="list-style-type: none"> <li>• Cured meat is reduced from 52°C to 12°C within 7.5 hours; and 5°C within 24 hours of completion of cooking.</li> </ul> </li> </ul> </li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li> <ul style="list-style-type: none"> <li>• Uncured meat is reduced from 52°C to 12°C within 6 hours; and 5°C within 24 hours of completion of cooking.</li> <li>○ Listeria management processes for vacuum or MAP packed RTE meats.</li> <li>○ Special requirements for UCFM processors (approval of each product subject to proforma).</li> </ul> </li> <li>• Testing:           <ul style="list-style-type: none"> <li>○ Verification:               <ul style="list-style-type: none"> <li>▪ Work surfaces.</li> <li>▪ Product specific pathogens outlined in FSSM.</li> </ul> </li> <li>○ Validation:               <ul style="list-style-type: none"> <li>▪ Shelf life.</li> </ul> </li> </ul> </li> </ul>
Retail Butcher Shop	<ul style="list-style-type: none"> <li>• Legal Requirement: NSW Standard for Construction and Hygienic Operation of Retail Meat Premises.</li> <li>• Food Safety Program: Yes, generic program drafted by NSW Food Authority (must be customised).</li> <li>• Food Safety Controls:           <ul style="list-style-type: none"> <li>○ Temperatures:               <ul style="list-style-type: none"> <li>▪ Carcasses and quarters no warmer than 7°C on surface.</li> <li>▪ Carcase parts no warmer than 5°C at site of micro concern.</li> <li>▪ During processing surface temp warmer than 7°C, or carried out in environment no warmer than 10°C.</li> <li>▪ Cooking, 65°C for 10 minutes (or equivalent).</li> <li>▪ Cooling:                   <ul style="list-style-type: none"> <li>• Cured meat is reduced from 52°C to 12°C within 7.5 hours; and 5°C within 24 hours of completion of cooking.</li> <li>• Uncured meat is reduced from 52°C to 12°C within 6 hours; and 5°C within 24 hours of completion of cooking.</li> </ul> </li> </ul> </li> <li>○ Listeria management processes for vacuum or MAP packed RTE meats.</li> <li>○ Special requirements for UCFM processors (approval of each product subject to proforma).</li> </ul> </li> <li>• Testing:           <ul style="list-style-type: none"> <li>○ SO2 testing and sampling will be carried out by the AO on meat products (mince, sausages and other products).</li> <li>○ Verification:               <ul style="list-style-type: none"> <li>▪ Product specific pathogens outlined in FSSM.</li> </ul> </li> <li>○ Validation:               <ul style="list-style-type: none"> <li>▪ Shelf life.</li> </ul> </li> </ul> </li> </ul>

Dairy Processor	<ul style="list-style-type: none"> <li>• Legal Requirement: Food Standards Code 4.2.4 (processing), 3.2.2, 3.2.3 premises and practices. ANZDAC Guideline for Food Safety: Validation and Verification of Heat Treatment Equipment (including AS3993:2003 for HTST pasteurisation).</li> <li>• Food Safety Program: Yes, drafted by business.</li> <li>• Food Safety Controls: <ul style="list-style-type: none"> <li>○ Times and temperatures: <ul style="list-style-type: none"> <li>▪ Pasteurised milk products, 72°C for no less than 15 seconds.</li> <li>▪ Pasteurised milk for cheese, 64.5°C for no less than 16 seconds, and the cheese product stored at no less than 7°C for no less than 90 days.</li> <li>▪ OR equivalent validated time and temperature.</li> <li>▪ Cooling – shock cooling OR cooling within two hours – from 60°C to 21°C; and within a further four hours – from 21°C to 5°C.</li> <li>▪ Raw milk cheeses, specific controls in Food Standards Code 4.2.4.</li> </ul> </li> </ul> </li> <li>• Testing: <ul style="list-style-type: none"> <li>○ Antibiotic.</li> <li>○ Verification: <ul style="list-style-type: none"> <li>▪ Pasteurisation verification (e.g. P-nitrophenol, Flurophos, Charm, etc.).</li> <li>▪ Product specific pathogens outlined in FSSM.</li> </ul> </li> <li>○ Validation: <ul style="list-style-type: none"> <li>▪ Shelf life.</li> </ul> </li> </ul> </li> </ul>
Seafood Processor	<ul style="list-style-type: none"> <li>• Legal Requirement: Food Standards Code 3.2.2, 3.2.3 premises and practices.</li> <li>• Food Safety Program: Yes, generic program drafted by NSW Food Authority (must be customised).</li> <li>• Food Safety Controls: <ul style="list-style-type: none"> <li>○ Temperatures: <ul style="list-style-type: none"> <li>▪ Potentially Hazardous Food 5°C or below; or 60°C or above.</li> <li>▪ Frozen food remains frozen.</li> <li>▪ Pathogens control step is reasonably known to achieve the microbiological safety of the food (e.g. Cooking, 65°C for 10 minutes (or equivalent)).</li> <li>▪ Reheated food rapidly heated to a temperature of 60°C or above.</li> <li>▪ Cooling, within two hours – from 60°C to 21°C; and within a further four hours – from 21°C to 5°C.</li> </ul> </li> <li>○ Special traceability and temperature controls for oyster processing.</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• Testing: <ul style="list-style-type: none"> <li>○ Verification: <ul style="list-style-type: none"> <li>▪ Product specific pathogens outlined in FSSM.</li> </ul> </li> <li>○ Validation: <ul style="list-style-type: none"> <li>▪ Shelf life.</li> </ul> </li> </ul> </li> </ul>
Shellfish Harvester	<ul style="list-style-type: none"> <li>• Legal Requirement: Food Standards Code 4.2.1 and NSW Shellfish Industry Manual.</li> <li>• Food Safety Program: Yes, generic program drafted by NSW Food Authority (must be customised and correct for activities such as harvest and hold).</li> <li>• Food Safety Controls: <ul style="list-style-type: none"> <li>○ All harvest must be carried out when area is in OPEN status.</li> <li>○ Date, time, and harvest area must be fully documented in Product Record (PR) book.</li> <li>○ Temperatures: <ul style="list-style-type: none"> <li>▪ Sydney Rock oysters: <ul style="list-style-type: none"> <li>• After depuration/harvest, stored at less than 25°C up to 72 hours and then placed at less than 21°C.</li> </ul> </li> <li>▪ Pacific oysters, Native Flat oysters, mussels and all other shellfish: <ul style="list-style-type: none"> <li>• After depuration/harvest, are placed at less than 10°C within 24 hours.</li> </ul> </li> </ul> </li> <li>○ Depuration must be carried out for a minimum of 36 hours.</li> <li>○ Full documentation of Relay (minimum 14 days), or Translocation (minimum 60 days) if carried out.</li> <li>○ Special traceability.</li> </ul> </li> <li>• Testing: <ul style="list-style-type: none"> <li>○ Verification: <ul style="list-style-type: none"> <li>▪ E.coli test to be carried out on shellfish once every calendar month in which a depuration is carried out.</li> </ul> </li> </ul> </li> </ul>
Vulnerable Populations Facility	<ul style="list-style-type: none"> <li>• Legal Requirement: Food Standards Code 3.2.1 Food Safety Program, 3.2.2, 3.2.3 premises and practices.</li> <li>• Food Safety Program: Yes, drafted by business.</li> <li>• Food Safety Controls: <ul style="list-style-type: none"> <li>○ Temperatures: <ul style="list-style-type: none"> <li>▪ Potentially Hazardous Food 5°C or below; or 60°C or above.</li> <li>▪ Frozen food remains frozen.</li> </ul> </li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>▪ Pathogens control step is reasonably known to achieve the microbiological safety of the food (e.g. Cooking, 65°C for 10 minutes (or equivalent)).</li> <li>▪ Reheated food rapidly heated to a temperature of 60°C or above.</li> <li>▪ Cooling, within two hours – from 60°C to 21°C; and within a further four hours – from 21°C to 5°C.</li> <li>○ Cross contamination (texture modified foods, allergens).</li> <li>○ High risk foods and processes are controlled (e.g. fresh fruit and veg, eggs, Listeria controls).</li> <li>• Testing: <ul style="list-style-type: none"> <li>○ Validation: <ul style="list-style-type: none"> <li>▪ Short and extended shelf life cook chill products (e.g. CPUs).</li> </ul> </li> </ul> </li> </ul>
Egg Processor	<ul style="list-style-type: none"> <li>• Legal Requirement: Food Standards Code 3.2.1 Food Safety Program, 3.2.2, 3.2.3 premises and practices. Food Standards Code 4.2.5. Pasteurisation equipment as outlined in Chapter 6 of Food Safety Schemes Manual.</li> <li>• Food Safety Program: Yes, drafted by business.</li> <li>• Food Safety Controls: <ul style="list-style-type: none"> <li>○ Pasteurisation as outlined in Food Standards Code 4.2.5. <ul style="list-style-type: none"> <li>▪ Times and Temperatures: <ul style="list-style-type: none"> <li>• Heating: <ul style="list-style-type: none"> <li>○ Egg pulp (without any sugar or salt), 64°C for 2.5 min, then immediately rapidly cooled.</li> <li>○ Liquid egg yolk, 60°C for 3.5 min, then immediately rapidly cooled.</li> <li>○ Liquid egg white, 55°C for 9.5 min, then immediately rapidly cooled.</li> <li>○ OR equivalent validated time and temperature.</li> </ul> </li> <li>• Cooling: <ul style="list-style-type: none"> <li>○ immediately rapidly cooled to &lt;7°C.</li> <li>○ OR within two hours – from 60°C to 21°C; and within a further four hours – from 21°C to 5°C (batch pasteurisation).</li> </ul> </li> </ul> </li> <li>○ OR equivalent process to kill pathogenic organisms.</li> <li>○ Identification and storage of cracked and/or dirty eggs.</li> <li>○ Egg declared on labelling (as an allergen).</li> </ul> </li> <li>• Testing: <ul style="list-style-type: none"> <li>○ Validation.</li> </ul> </li> </ul> </li> </ul>

Fruit and Vegetable Processor	<ul style="list-style-type: none"><li>• Legal Requirement: Food Standards Code 3.2.1 Food Safety Program, 3.2.2, 3.2.3 premises and practices.</li><li>• Food Safety Program: Yes, drafted by business.</li><li>• Food Safety Controls:<ul style="list-style-type: none"><li>○ Temperatures:<ul style="list-style-type: none"><li>▪ Potentially Hazardous Food 5°C or below; or 60°C or above.</li><li>▪ Pathogens control step is reasonably known to achieve the microbiological safety of the food (e.g. sanitiser concentration, Cooking/heat treating 65°C for 10 minutes (or equivalent)).</li></ul></li><li>○ Final product water activity/pH.</li></ul></li><li>• Testing:<ul style="list-style-type: none"><li>○ Verification:<ul style="list-style-type: none"><li>▪ Product specific pathogens outlined in FSSM.</li></ul></li><li>○ Validation.</li></ul></li></ul>
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Table 6: General audit guidance

Category		Minor	Major	Critical
Food Safety Program	Licence		Licence permission incorrect for activities sighted during audit (e.g. other commodity, transport).	Licence permission incorrect for high risk activities sighted (e.g. UCFM).
	Food Safety Program (FSP)	FSP has not been authorised by licensee of the business.	No FSP available at audit but daily monitoring records are available (Generic FSPs only).	FSP not available at audit and no monitoring records completed >2 months (Generic FSPs only).
				No FSP available at audit.
		FSP has not been customised to reflect current operations (minor details missing/changed).	FSP has not been customised to reflect current operations (major process missing/changed e.g. not high risk/RTE product, similar process with similar controls).	FSP has not been customised to reflect current operations (significant/critical processes missing/changed, e.g. addition of high risk/RTE product, new process with critical step).
			Hazards, control measures, or corrective action not sufficiently identified or monitored.	Hazards, control measures, or corrective action not sufficiently identified or monitored (significant food safety risk).
Hygiene & Sanitation	Hygiene	The hygiene system failed to prevent minor or small number of hygiene issues observed.	The hygiene system failed to prevent major or moderate number of hygiene issues observed, including food contact surfaces.	The hygiene system failed to prevent critical hygiene issues observed with significant visible matter/contamination on a large number of surfaces, fixtures, fittings and equipment, including RTE food contact surfaces.
		Hygiene and sanitation program and procedures not adequately documented.	The hygiene program did not identify and/or rectify hygiene issues observed.	



Category		Minor	Major	Critical
	High Risk/RTE Products			High risk food contact surfaces have not been cleaned or sanitised ( slicer, RTE cutting boards, equipment, and RTE storage area).
Construction & Maintenance	Construction & Maintenance	The construction and maintenance system failed to prevent minor or small number of issues observed. Issues unlikely to contaminate food (walls, ceiling, floor, rails).	The construction and maintenance system failed to prevent major or moderate number of issues observed. Issues have increased likelihood to contaminate food.	The construction and maintenance system failed to prevent critical or significant number of issues. Issues pose an imminent food safety risk. No attempt has been made to rectify significant equipment or structural issues.
		Construction and maintenance program and procedures not adequately documented	Construction and maintenance program did not identify and/or provide timely rectification of construction and maintenance issues.	
	Hand Wash	Hand washing facilities are present however one of the following is not present: 1. Hand drying facilities 2. Non-hand operated taps (meat business only).	Hand washing facilities are not provided with warm running water (temporary issue).	Hand washing facilities are not present or are not easily accessible.  Hand washing facilities are not operational.  Hand washing facilities are not connected to or provided with warm running water.
Process Control	Monitoring	Some monitoring records missing or incomplete < 1 week (low food safety risk).	No monitoring records for > 1 week < 2 months (low food safety risk)	> 2 months or no monitoring records at all (low food safety risk), missing or incomplete records (high/critical food safety risk).
		The business has failed to rectify defects identified through monitoring.	Records do not reflect the condition of the premises (hygiene, maintenance and process records are not accurate).	

Category		Minor	Major	Critical
Cooking Temperatures			No cook/cool records of non RTE products (pies, soups, casseroles etc.)	Cooking temperatures have not achieved 65°C for 10 minutes or equivalent.
			No cooking/drying records for RTE products for 5 batches.	No cooking records for RTE products for >5 batches.
			Cooling verification records not carried out at frequency in the FSP	No cooling verification records available
				Cooked food products have not been cooled in accordance with the cooling requirements (or validated alternative).
				Storage equipment in facility is not functional and cannot maintain meat under temperature control.
Ingredients			Products or ingredients/marinades are stored or being used after their use by date.	Products being sold or displayed for sale after the use by date.
Cross Contamination			Tubs on the floor, tub lids not closed, ingredient bags not sealed.	Significant food safety risk was identified.
			RTE products touching fixtures, fittings and not stored in a way that prevents cross contamination.	RTE products visibly contaminated by raw products or other contaminants.
			Business is not preventing cross contamination.	
			Strings/packaging unclean or not used or stored to prevent contamination.	

Category		Minor	Major	Critical
	Disposal of food		Food for disposal is not held/kept separate or identified	
ID & Traceability	Traceability		The traceability program cannot ensure that all inputs, ingredients and outputs can be traced.	No batch coding in place for RTE food products
	Recall		The business does not have a documented recall system (does not apply to retail businesses).	Recall system has not been effective in recalling unsafe food.
	Labelling		No Country of Origin labelling on packaged product	Allergens not identified or declared on labelling
			Important product information missing on packaged product (e.g. Business name and address)	Date labelling altered/tampered on displayed product
			No identification of ingredients and/or marinades on value added product	
			No Nutrition Information Panel on value added product	
Analytical & Testing	Testing	Testing reagents or equipment not within usable shelf life.	Business has not conducted testing in compliance with their FSP/FSSM (pathogen verification testing, water) – 1 test missed	Business has not conducted testing in compliance with their FSP/FSSM - >2 tests missed
		Business has not adequately documented testing	Business has not conducted testing at a NATA registered laboratory	Business failed to implement appropriate corrective action as a result of unacceptable test



Category		Minor	Major	Critical
			Business has not conducted shelf life testing /pH testing/ water activity testing as outlined in the FSP.	The facility has not notified the Food Authority of a failed test (verbal 24 hours, written 7 days)
Pre-requisite Programs	Calibration	Temperature measuring equipment has not be calibrated at frequency identified in the FSP	Thermometer/pH meter has not been calibrated as outlined by manufacturer's instructions or at a minimum of every 12 months	A thermometer is not operational or available
	Pest Control	Treatments not carried out as per the FSP, or no pest control treatments carried out for >6 months.	No pest control system (with no evidence of pests) or no pest treatment carried out for >12 months.	The pest control program has failed to prevent visible pest infestation or high levels of pests activity in facility; <ul style="list-style-type: none"> <li>• Evidence of harbourage</li> <li>• Evidence of breeding</li> <li>• Failure to prevent entry of pests</li> <li>• Inadequate or no pest control programs</li> <li>• Evidence of droppings, smears</li> </ul>
		Some pest treatment reports missing or not sufficiently detailed (pests and areas treated, chemicals used).	No pest treatment reports available.	
	Internal Audit	Internal audit has not identified deficiencies in the Food Safety Systems	No internal audit conducted for >12 months	



Category		Minor	Major	Critical
	GMP	No soap or hand drying available at hand wash	No soap or paper towel available in facility	
		Hand wash basin not exclusively used for washing hands, arms and face	Employee clothing unclean or damaged	
	Training	Staff not identified in the training matrix	Staff are not competent in their duties.	
	Allergens		Allergens not identified or controlled in processing	
	Chemicals	<i>Note: Readily available chemicals (pest control and cleaning) are OK to be used so long as they do not contaminate food or food contact surfaces</i>	Unsuitable chemicals used in facility and/or not used per manufacturer instructions	No cleaning chemicals available in the facility
Corrective Action	Previous CARs	Business has failed to document action taken against CARs raised during previous audit.	Business has failed to rectify MINOR CARs issued at previous audits	Business has failed to rectify MAJOR CARs issued at previous audit



Table 7. Meat processing facilities

General Audit Guidance		Red Meat	Non-red Meat	
Category	Minor	Major	Critical	
	SO2		SO <sub>2</sub> positive field test. Samples and enforcement action will be taken.	
Process Control	Monitoring	Carcase cooling records incomplete.	No carcase cooling records.	
	Temperatures	Temperature of raw product >5°C but <10°C above critical limit. Carcases loaded into transport >7°C quarters or larger, >5°C boxed meat or smaller than quarters.	Temperature of raw product >15°C above critical limit.	
	RTE Products	Temperature of RTE products 5°C -10°C	Temperature of RTE product >10°C	
	Processing		Poultry wash water >18°C (single event/short time period during processing)	Poultry wash water >18°C (multiple event/extended time period during processing)
			Spin chiller water > 4°C (single event short time period during processing)	Spin chiller water > 4°C (multiple event/extended time period during processing)
			Carcases or carcase parts not chilled as outlined in the Australian Standard.	Spin chillers and/or washer do not have a detectable level of free residual chlorine.
<i>Listeria</i> Management		Post pack pasteurisation temperatures not recorded.	Non-compliance with <i>Listeria</i> controls (e.g. post pack pasteurisation)	



	Cross Contamination	Dressing controls failed to prevent significant minor contamination on carcase or carcase parts (not zero tolerance defects).	Dressing controls failed to prevent moderate contamination on carcase or carcase parts (including zero tolerance defects).	Dressing controls failed to prevent significant or large number of carcase or carcase parts being contaminated with zero tolerance defects.
		Staff not correctly sterilising knives	Slaughtering and dressing not carried out in a manner which prevents contamination	
	AQL/MHA		AQL/MHA system is not identifying and removing dressing defects	
	Meat Inspection		Meat inspector not correctly applying inspection procedures or identifying diseases and contamination	
ID & Traceability	Traceability		Condemned animals not documented	Animals slaughtered without a valid NVD or traceability information.
	NLIS		Slaughter data not uploaded to NLIS database < 7 days	No data uploaded to NLIS database > 7days
			ERP check not carried out on all cattle consignments	Animal with ERP status slaughtered and dispatched without system identifying and testing.
	Labelling		Carcase or carcase parts not correctly branded or traceable.	Missing or stolen official marks not reported to the Food Authority within 24 hours
		Inedible and pet food not correctly banded and labelled (red/yellow).		
Analytical & Testing	Testing		Dried meat products have not been tested for water activity levels Jerky/Biltong - <0.85 aW Prosciutto/Speck/Coppa - <0.92 Aw	



Pre-requisite Programs	GMP	Staff not wearing hair and beard coverings		
		Knife kits not clean or maintained free of rust or damage.		
	Training			No evidence of Stun Stick Shackle or AWO training or certification available during audit. #
	Animal Welfare (abattoir only)	Animal welfare controls not sufficiently documented.	Animals not effectively stunned and insensible to pain at slaughter.	Animals not humanely slaughtered.
		Animal welfare checks not documented as outlined in the FSP (< 1 week).	Animal welfare checks not documented as outlined in the FSP (> 1 week).	No animal welfare monitoring available.
		Animal holding areas not effectively maintained.	Animals not effectively restrained to allow for effective stunning.	Staff observed abusing or mistreating animals
		Goads, restrain, stun and slaughter equipment not sufficiently maintained.	Animals not penned/caged to minimise pain, stress, or injury.	Stun, stick and shackle carried out by untrained operator.
		No notifiable disease procedure.	Animals not moved/hung to minimise pain, stress, or injury.	No AWO on site during slaughtering

# Note; Personnel are able to carry out stunning, sticking or shackling prior to completing or receiving certificate for recognised course as long as they have completed on site training and are deemed competent by AWO. Personnel must complete recognised course within 6 months of commencing these tasks.



**Table 8. Export registered meat facilities**

Guidance for specific industries can be found on the federal Department of Agriculture and Water Resources (DoAW) website:

Red Meat – <http://www.agriculture.gov.au/SiteCollectionDocuments/aqis/exporting/meat/market-access-advice/maa-2010/approved-arrangements-guidelines-meat.pdf>

Non-red Meat – <http://www.agriculture.gov.au/SiteCollectionDocuments/aqis/exporting/meat/market-access-advice/maa-2010/poultry-meat-workbook.pdf>

General Audit Guidance		Red Meat	Non-red Meat
Category	Minor	Major	Critical
Registration	Approved Arrangement (AA)		
	Certificate of registration		
	<p>Organisation structure, responsibilities, authorities, and commitment to export legislation not documented.</p> <ul style="list-style-type: none"> <li>• Certificate of registration does not have current personnel, processes, or country listing (if required).</li> <li>• RFP validators not currently on certificate of registration.</li> <li>• Importing country requirements not available for all countries exported to.</li> </ul>		



ID & Traceability	Halal	Halal program is not sufficiently documented or audited (if required).	Halal and non-Halal meat not identified and segregated.	
	MTCs	Not all MTCs reconciled (within 21 days).	MTCs not reconciled (within 21 days). MTC's have not been completed correctly, i.e. product descriptions, weights, types of packaging chilled or frozen etc. MTC signed by person not approved under AA. MTC has incomplete or incorrect market eligibility.	
	Official Marks	Official marks not accounted for or reconciled weekly.	Official marks and marking devices (printers) not secure.	Missing or stolen official marks.
		Official marks and resemblances do not comply with PGOs.	Official marks on product not eligible for export (from non-export chain establishment/process).	
Analytical & Testing	Testing		Non-compliance with importing country testing requirements.	The facility has not notified the Food Authority and DoAW of a failed test (verbal 24 hours, written 7 days)
		Water testing not carried out monthly.	No corrective action taken in response to failed water test (no food safety risk evident).	No corrective action taken in response to failed water test (food safety risk evident or likely).
		Water testing not carried out quarterly.		

Table 9. Dairy processing

Category		Minor	Major	Critical
Process Control	Monitoring		Divert valves not checked daily on continuous flow pasteurisers (<1 week).	Continuous flow pasteuriser records missing or incomplete (>1 week).
				Batch pasteuriser records missing or incomplete (>1 week).
				Head space temperatures not monitored (>1 week).
	Temperature	Temperature of raw milk received >5°C without appropriate corrective action.	Temperature of raw milk received >10°C without appropriate corrective action.	Dairy products have not been heated in compliance with Food Standards Code requirements (chapter 4.2.4). (72°C for 15 seconds –milk/64.5°C for 16 seconds-cheese or validated equivalent).
			Potentially hazardous food dispatched >5°C.	Dairy products have not been cooled in compliance with Food Standards Code requirements (chapter 4.2.4).
	Processing		Dairy products not processed in accordance with AS3993 and ANZDAC guideline requirements (monitoring, time/temperature, pressure differential, leak detection (duo plate only)).	Finished cultured products did not reach a pH <4.5.
	Ingredients		Ingredients or cultures used after their use by date.	
Analytical & Testing	Testing		Pasteurisation validation not carried out on milk and cream (i.e. Phosphatase testing).	

Pre-requisite Programs	Calibration		Thermometer has not been calibrated for 6 months (batch pasteuriser and other thermometers)	
			Thermometers, RTDs, recording pens, pressure gauges and temperature gauges on the pasteuriser have not been calibrated in accordance with AS3993 (HTST pasteurisation only).	Thermometers, RTDs, recording pens, pressure gauges and temperature gauges on the pasteuriser not available or operational at time of audit

Table 10 .Export registered dairy facilities

Guidance for export facilities can be found on the federal Department of Agriculture and Water Resources (DoAW) website, and the Manual of Imported Country Requirements (MICO):

<http://www.agriculture.gov.au/export/food/dairy/dairy-eggs-fish-export-guidelines>

<http://www.agriculture.gov.au/export/food/dairy/pubs-guidelines>

Category		Minor	Major	Critical
Registration	Approved Arrangement (AA)	Organisation structure, responsibilities, authorities, and commitment to export legislation not documented.	Significant change to AA or process has not been communicated to relevant authority.	
	Certificate of Registration	Certificate of registration does not have current personnel, processes, or country listing (if required). Importing country requirements not available for all countries exported to.		
ID & Traceability	TC/TDs		Transfer certificates not correctly completed. Transfer certificates not identifying country eligibility. Transfer certificates not available for incoming dairy ingredients.	
Analytical & Testing	Testing		Non-compliance with importing country testing requirements (e.g. Bulk milk, and pathogen testing every batch for EU).	The facility has not notified the Food Authority and DoAW of a failed test (verbal 24 hours, written 7 days).
		Water testing not carried out monthly.	No corrective action taken in response to failed water test (no food safety risk evident).	No corrective action taken in response to failed water test (food safety risk evident or likely).

Table 11. Vulnerable populations

Category		Minor	Major	Critical
Process Control	Monitoring		No cooking records for 5 batches. No cooling verification records available for 5 batches.	No cooking records > 5 batches. No cooling verification records available for > 5 batches.
	Temperature	Temperature PHF received >5°C without appropriate corrective action.	Temperature PHF received >10°C without appropriate corrective action (discarding).	Food not cooled in accordance with requirements of the Code.
		Frozen PHF not stored at temperatures identified on manufactures label or hard frozen.	PHF stored out of temperature control (>5°C - <60°C) or safe alternative (4 hour/2hour).	
			Cooked chilled food not cooled in accordance with the validated cooling procedure (e.g. extended shelf life cook-chill, short shelf life cook chill).	Food not cooked for a validated time/temperature (i.e. as outlined in the <i>Guidelines for Food Service to Vulnerable Persons</i> or alternative [e.g. extended shelf life cook-chill]).
	Processing		PHF not thawed under temperature control or safe alternative.	Business has not controlled the risks associated with high risk foods (e.g. process, shelf life, listeria).
			PHF thawed, cook chill, leftovers, sandwiches, liquid supplements, not used within a valid shelf life (i.e. as outlined in Guidelines for food service to vulnerable populations or an alternative).	Vitamised food/nutritional supplements have not been maintained under temperature control.
				Vitamised food/nutritional supplements have not been made or used within validated shelf life.
				Vitamised food/nutritional supplements have not been sufficiently heat treated (or reheated).



	Ingredients	Food stored past use by date applied by the business (i.e. after opening or producing).		
Product ID & Traceability	Labelling	Food not labelled as outlined in the FSP (e.g. opened food).		
		Thawed food not labelled for use with 48 hours or thawing (or safe alternative).		

Table 12. Seafood processing

Category		Minor	Major	Critical
Process Control	Monitoring			Any receipt, processing or dispatch records for oysters missing.
	Temperature	Temperature of raw product 5-10°C.	Temperature of raw product 10-15°C. Temperature of RTE products 7-10°C.	Temperature of raw product >15°C. Temperature of RTE product >10°C.
	Cooking Temperature		Cooking verification for crustaceans has not been carried out.	
	Cross Contamination		Unopened oysters have excess mud, sediment or debris (with Improvement Notice to be issued on harvester).	
Product ID & Traceability	Traceability	Unopened/in-coming oysters do not have species, harvest date and location, storage conditions, and name and address of the business (either processor or supplier).	Opened or unopened oysters not identified with either batch or PR numbers.	





Table 13.Shellfish harvesting

This guidance will be used when carrying out compliance audits on shellfish harvesters triggered by harvest data submitted to the Food Authority.

Category		Minor	Major	Critical
Food Safety Program	Licence		License permission incorrect for activities sighted during audit (e.g. other commodity, transport).	Licence permission incorrect for activities sighted (depuration harvest and hold).
	Food Safety Program		Incorrect generic FSP available for activities carried out (harvest and hold).	No FSP available at audit.
Process Control	Monitoring	Estuary or zone not filled in PR book	Time of harvest not filled in PR record (with no closures on that date).	Time of harvest not filled in PR record (with closures on that date).
				Date not filled in PR book.
			Depuration section incomplete density and salinity not recorded.	Depuration section incomplete times or dates recorded.
			Destination section of PR record not filled – 5 occasions.	Destination section of PR record not filled – > 5 occasions.
			Relay or translocation not fully recorded.	Oysters not depurated for minimum 36 hours.
				Relayed oysters sold before 14 days in conditionally approved zone (in open status for fully 14 days).
			Translocated oysters sold before 60 days in conditionally restricted/approved zone.	



	Temperature	Temperature records are not filled in for oysters stored for >12 hours – 5 occasions.	Temperature records are not filled in for oysters stored for >12 hours- > 5 occasions.	Oysters not stored under required temps (SRO <25, others <10)).
	Cross Contamination		Oyster bags/boxes not stored protected from contamination.	Oysters ready for sale (bagged) not sufficiently washed to remove mud.
ID & Traceability	Traceability		Direct harvest oysters not washed.	
	Labelling	No Country of Origin, business name and address, species or storage conditions labels or bags.	Translocated or relayed oysters not identified on lease maps.	Oysters for sale not identified with PR numbers.
			No Country of Origin labelling on oysters for sale.	No harvest date and location on oysters for sale.
			No business name and address on oysters for sale.	
			No species on oysters for sale.	
		No storage conditions on oysters for sale.		
Analytical & Testing	Testing		Depuration tank verification not carried out on first batch depurated after 3 months not using tank.	
Pre-requisite programs	Calibration	Thermometer meter has not been calibrated as outlined by manufacturer's instructions or at a minimum of every 12 months.	Thermometer is not operational or available.	
		UV light life not documented.	UV light not operational at time of audit.	



	Chemicals	<i>Note: Readily available chemicals (pest control and cleaning) are OK to be used so long as they do not contaminate food or food contact surfaces.</i>	Unsuitable chemicals used in facility and/or not used per manufacturer instructions.	
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Table 14. Egg processing

Category		Minor	Major	Critical
Process Control	Monitoring		Divert valves not checked daily on continuous flow pasteurisers (<1week).	Continuous flow pasteuriser records missing or incomplete (>1 week).
				Batch pasteuriser records missing or incomplete (>1 week).
				Head space temperatures not monitored (>1 week).
	Temperature		Processed egg products (pasteurised) not stored under temperature control.	Egg products have not been heated in compliance with Food Standards Code requirements (chapter 4.2.5).
			Potentially hazardous food dispatched >5°C.	Egg products have not been cooled in compliance with Food Standards Code requirements (chapter 4.2.5) (rapidly <7°C or 60°C to 21°C in two hours and from 21°C to 5°C within a further four hours).
	Processing		Egg products not processed in accordance with NSW Food Safety Schemes Manual requirements (monitoring, time/temperature, pressure differential, leak detection(duo plate only))	
Pre-requisite Programs	Calibration		Thermometer has not been calibrated for 6 months (batch pasteuriser and other thermometers)	
			Thermometers, RTDs, recording pens, pressure gauges and temperature gauges on the pasteuriser have not been calibrated in accordance with chapter 6 of the NSW Food Safety Schemes Manual	Thermometers, RTDs, recording pens, pressure gauges and temperature gauges on the pasteuriser not available or operational at time of audit



Table 15. Export registered egg facilities

Guidance for export facilities can be found on the federal DoAW website, and MICoR:

<http://www.agriculture.gov.au/export/food/dairy/dairy-eggs-fish-export-guidelines>

Category		Minor	Major	Critical
Registration	Approved Arrangement (AA)	Organisation structure, responsibilities, authorities, and commitment to export legislation not documented.	Significant change to AA or process has not been communicated to relevant authority.	
	Certificate of Registration	Certificate of registration does not have current personnel, processes, or country listing (if required). Importing country requirements not available for all countries exported to.		
ID & Traceability	TC/TDs		Transfer certificates not correctly completed. Transfer certificates not identifying country eligibility. Transfer certificates not available for incoming egg ingredients.	
Analytical & Testing	Testing		Non-compliance with importing country testing requirements.	The facility has not notified the Food Authority and DoAW of a failed test (verbal 24 hours, written 7 days).
		Water testing not carried out monthly.	No corrective action taken in response to failed water test (no food safety risk evident).	No corrective action taken in response to failed water test (food safety risk evident or likely).

Table 16. Fruit and vegetable processing

Category		Minor	Major	Critical
Process Control	Monitoring		Pathogen control step not recorded for 5 batches (e.g. sanitising).	Pathogen control step not recorded for > 5 batches (e.g. sanitising).
	Temperature		Finished product is not being rapidly chilled.	
	Processing			Pathogen control step not achieving critical limits.
	Ingredients		Incoming product is not being inspected or recorded.	
	Fresh-cut fruit & vegetables		Produce is not being adequately graded and/or trimmed prior to processing.	
			Sorting and washing operations are not separated from processing areas.	
	Seed sprouts		Pre-screening is not being conducted on incoming seeds.	
			Business is not adhering to a documented sampling procedure for seed pre-screening.	
			Alfalfa seeds have not been sanitised for 10 minutes in 20,000ppm calcium hypochlorite solution.	
			Seeds have not been sanitised for 10 minutes in 2000ppm calcium hypochlorite solution.	
Vegetables in oil		Business is not verifying that pH of <4.6 is achieved for each batch.		
Unpasteurised juices		Sorting and washing operations are not separated from processing areas.		
		Product is not sanitised prior to processing.		

**NOTES:**



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