

## Circular

**Title:** Food Safety Standards  
**Document ID:** C23010  
**To:** All Clubs  
**Date:** 12<sup>th</sup> December 2023

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Does your club operate a canteen or kitchen?

If yes, you're likely to be captured by the new food safety Standard 3.2.2A which requires clubs to:

1. Make sure food handlers complete a food safety training course and/or show that they understand and can demonstrate safe food handling, food contamination, cleaning and sanitising and personal hygiene.
2. Appoint a food safety supervisor and make sure they're available to oversee food handling operations.
3. Show that they're managing key food safety controls through keeping records or otherwise showing their authorised officer.

Additional information is attached.

For more information speak to your local council Environmental Health Officer or visit:

[www.sahealth.sa.gov.au/foodsafetymanagement](http://www.sahealth.sa.gov.au/foodsafetymanagement)



# FOOD SAFETY STANDARD 3.2.2A WHAT DO YOU NEED TO KNOW?

## FOOD HANDLER TRAINING

Food handlers must do a food safety training course in **OR** show that they understand:

- safe handling of food
- food contamination
- cleaning and sanitising equipment
- personal hygiene

Applies to **CATEGORY 1** and **CATEGORY 2** businesses

## FOOD SAFETY SUPERVISOR

A food business must have a food safety supervisor who:

- is qualified
- has a supervisor's certificate
- can give advice to people who make food
- is reasonably available

Applies to **CATEGORY 1** and **CATEGORY 2** businesses

## SHOWING THAT YOUR FOOD IS SAFE

A food business must show that they are making safe food by:

- keeping a record of important food safety controls/activities/processes
- demonstrating safe food handling practices

Applies to **CATEGORY 1** businesses **ONLY**

## BUSINESS CATEGORY TYPES

### CATEGORY 1

Businesses that make and serve food that is unpackaged.  
Examples may include:

- restaurants
- bakeries
- fast food outlets
- caterers

### CATEGORY 2

Businesses that sell ready-to-eat food that is unpackaged and not made by the business.  
Examples may include:

- delis
- service stations
- supermarkets
- seafood and meat retailers

	CATEGORY 1	CATEGORY 2
Food Handler Training	✓	✓
Food Safety Supervisor	✓	✓
Keeping or demonstrating evidence	✓	X



[www.sahealth.sa.gov.au/foodsafetymanagement](http://www.sahealth.sa.gov.au/foodsafetymanagement)



Government of South Australia  
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# Food Safety Management Tools for not-for-profit organisations

The following information is to help not-for-profit organisations understand how Standard 3.2.2A may affect their food service activities.

## What is Standard 3.2.2A - Food Safety Management Tools?

[Standard 3.2.2A](#) is a new national Food Safety Standard to assist food businesses in handling and processing food in a way to ensure it is safe to eat.

It requires category one and category two food businesses to implement up to three new Food Safety Management Tools:

- > **Food handler training** – making sure food handlers complete a food safety training course in, or be able to show they understand, safe handling of food, food contamination, cleaning and sanitising equipment, and personal hygiene.
- > **Food safety supervisor** – appointing a qualified food safety supervisor to oversee food handling activities.
- > **Evidence of key food safety controls (category one only)** – showing they're meeting the food safety standards for temperature control, food processing and cleaning and sanitising of food preparation surfaces and utensils.

## How will Standard 3.2.2A affect not-for-profit organisations?

Not-for-profit organisations will have to implement the tools that apply to their category.

Not-for-profit organisations who operate less frequently are given some flexibility around implementing the food safety supervisor tool, while the Standard will not apply for some activities.

## Not-for-profit organisations who don't need to implement Standard 3.2.2A

**Standard 3.2.2A does NOT apply to not-for-profit organisations who:**

- > do not sell food
- > handle and sell low risk food
- > handle and sell packaged food only
- > provide food for or at \*fund raising events

\* Fund raising event is defined in the Food Standards Code, see below.

<b>Examples</b>	<ul style="list-style-type: none"> <li>&gt; A community organisation that offers meals only on special occasions (e.g. Christmas, Easter, Australia Day) throughout the year.</li> <li>&gt; A sporting club hosting a movie night with popcorn, fairy floss and coffee.</li> <li>&gt; Fund raising stalls at a school fair.</li> <li>&gt; A charity or community group running fund raising barbeques.</li> <li>&gt; Selling low-risk or shelf stable foods, such as jam, cupcakes and cookies.</li> <li>&gt; Giving away food for free to the disadvantaged.</li> </ul>
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Note: Regardless of whether an organisation is captured by or exempt from Standard 3.2.2A, if they are selling food, they must still meet the general Food Safety Standards 3.2.2 and 3.2.3.



## Not-for-profit organisations who operate infrequently

A not-for-profit organisation that operates on an ongoing basis at regular times, but not most days of the week, can have some flexibility in applying the food safety supervisor tool.

Examples	<ul style="list-style-type: none"><li>&gt; A sporting club that provides meals/canteen/barbeque only on training nights and/or game days (i.e. 1-3 days a week).</li><li>&gt; A church group that provides a meal after church services a few times a week.</li><li>&gt; A school canteen that only operates one or two days a week.</li></ul>
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These not-for-profit organisations must have a qualified food safety supervisor who is either onsite or contactable by phone when food handling occurs. The food safety supervisor is responsible for overseeing the not-for-profit organisation's food handling operations and ensuring:

- > all other food handlers have appropriate skills and knowledge
- > safe food handling processes are in place.

Example	A sporting club runs a canteen and barbeque on Saturdays and Sundays. A roster of volunteers (parents, friends, and club members) are the food handlers. One club member who already organises the canteen is nominated as the food safety supervisor (FSS). This person has obtained FSS certification within the last five years from a registered training organisation and is responsible for ordering the food for the club, rostering the volunteer food handlers and ensuring food safety standards are met (i.e. by making procedures for other volunteers to follow). The FSS volunteers in the canteen regularly and when not onsite is contactable via phone when the canteen and barbeque are operating.
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## Not-for-profit organisations who operate frequently

Any not-for-profit organisation where food handling occurs on most days of the week throughout the year or period/season it operates, will have to implement Standard 3.2.2A. These food handling operations are generally similar to regular (for profit) food businesses and operate frequently at regular times. Their food handlers may be paid or volunteers.

Examples	<ul style="list-style-type: none"><li>&gt; A sporting or community club that offers meals in a manner like a pub, restaurant or café, and operates most days of the week.</li><li>&gt; Delivered meal organisations making and delivering food for vulnerable persons.</li><li>&gt; School canteens and Out of School Hours Care (OSHC) making and serving potentially hazardous foods to children most days of the week.</li></ul>
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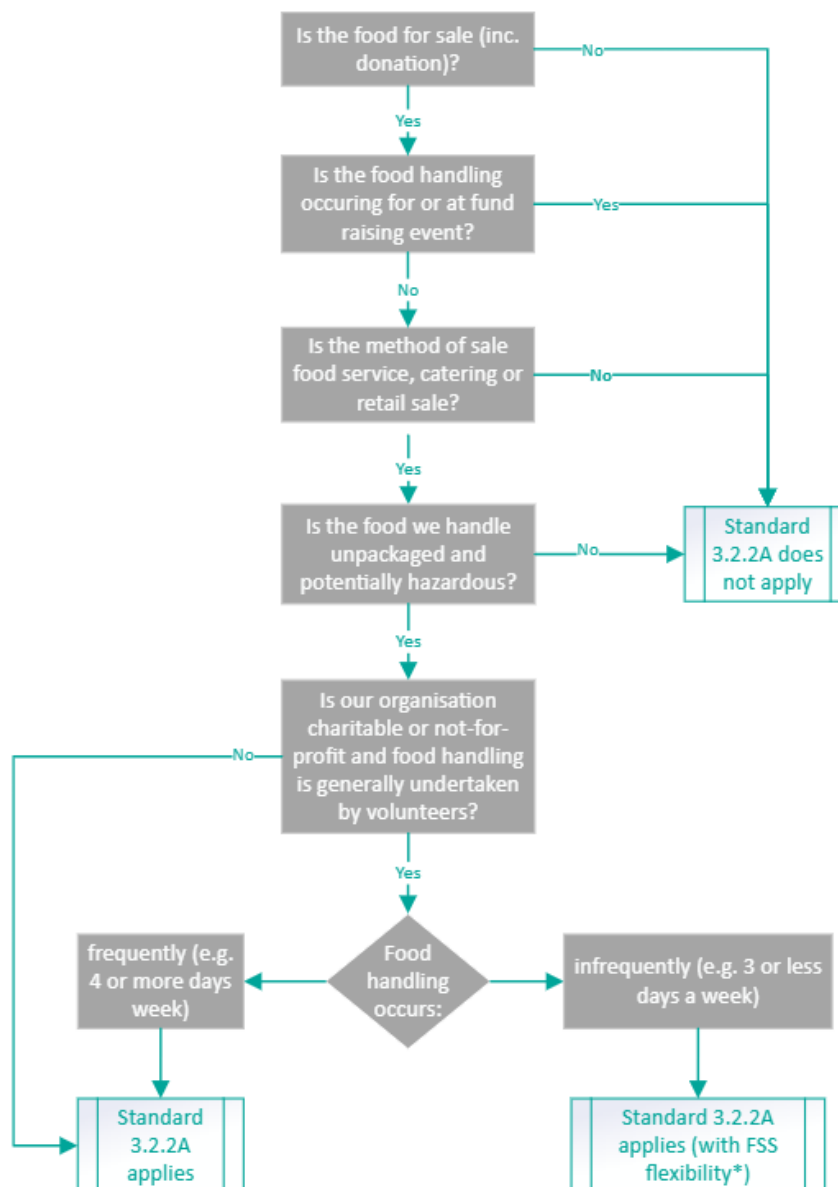
## Summary table: Standard 3.2.2A and not-for-profit organisations

Setting/ organisation	Activity	Std 3.2.2A category	Typical food handler type	Typical days of operation	Does Std 3.2.2A apply?
Church or community group	Giving away foods for free to disadvantaged persons (e.g. soup kitchen, Foodbank)*	Either	Volunteer	4-7 days a week	No
Church or community group	Fund raising barbeque (ad hoc/infrequent) (e.g. Rotary, Lions)	Category 1	Volunteer	Once-off or 1 day occasionally	No
Church or community group	Catering for events (ad hoc/infrequent)	Category 1	Volunteer	Once-off or 1 day occasionally	No
Church or community group	Providing meals after service/event	Category 1	Volunteer	2-3 days a week	Yes - with FSS flexibility**
Church or community group	Providing meals in a café	Category 1	Volunteer	4-7 days a week	Yes
Delivered meal organisation	Preparing and delivering meals to older persons	Category 1	Volunteer	5 days a week	Yes
School	Fund raising event (fete, fair)	Either	Volunteer	Once-off or 1 day occasionally	No
School	Canteen	Either	Either	5 days a week	Yes
School	OSHC providing meals/potentially hazardous snacks	Category 1	Paid	5 days a week	Yes
Sporting club	Occasional fund raising barbeque	Category 1	Volunteer	Once-off or 1 day occasionally	No
Sporting club	Catering for events (ad hoc/infrequent)	Category 1	Volunteer	Once-off or 1 day occasionally	No
Sporting club	Barbeque (training/ game days)	Category 1	Volunteer	2-3 days a week	Yes - with FSS flexibility**
Sporting club	Canteen (reheat pies, pasties, nuggets, etc.)	Category 2	Volunteer	2-3 days a week	Yes - with FSS flexibility**
Sporting club	Meal service (training/game days)	Category 1	Volunteer	2-3 days a week	Yes - with FSS flexibility**
Sporting club	Licensed or unlicensed venue with pub or café style meal service	Category 1	Paid	4-7 days a week	Yes

\* where food is provided free of charge the activity is not a food business as defined by the *Food Act 2001* (the Act) therefore the organisation is not required to comply with the Food Standards Code or the Act.

\*\* more information about applying flexibility to FSS requirements is available on page 2

## Flow chart: Is my not-for-profit organisation captured by 3.2.2A?



## Definitions

### Category one business

Under Standard 3.2.2A-6 a **category one business** means a food business that:

- (a) is a \*caterer or a food service; and
- (b) processes unpackaged potentially hazardous food into a food that is:
  - (i) potentially hazardous food; and
  - (ii) ready-to-eat food.

### Category two business

Under Standard 3.2.2A-7 a **category two business** means a food business that offers for retail sale a food that is:

- (a) potentially hazardous food; and
- (b) ready-to-eat food; and

where that food:

- (i) was received unpackaged by the food business or was unpackaged by the food business after receipt; and
- (ii) was not made or processed (other than slicing, weighing, repacking, reheating or hot-holding the food) by the food business.

## Charity

Under the [Charities Act 2013 \(Cwth\)](#) **charity** means an entity:

- (a) that is a not-for-profit entity; and
- (b) all of the purposes of which are:
  - (i) charitable purposes (see Part 3) that are for the public benefit (see Division 2 of this Part); or
  - (ii) purposes that are incidental or ancillary to, and in furtherance or in aid of, purposes of the entity covered by subparagraph (i); and
- (c) none of the purposes of which are disqualifying purposes (see Division 3); and
- (d) that is not an individual, a political party or a government entity.

Source: <https://www.acnc.gov.au/for-charities/start-charity/legal-meaning-charity>, Australian Charities and Not-for-profits Commission

## Fund raising event

Under the Food Standards Code, [Standard 1.1.2](#) a **fund raising event** is an event that raises funds solely for a community or charitable cause and not for personal financial gain. Generally, fund raising events will occur on a once-off or infrequent basis where organisations will raise awareness of and/or funds for other charities (license from [Consumer Business Services SA](#) may be required) or for their own charity or community organisations' purpose.

## Not-for-profit

A not-for-profit (NFP) is an organisation that does not operate for the profit, personal gain, or other benefit of particular people (e.g. its members, the people who run the organisation, or their friends or relatives). An organisation can still be a NFP if it provides a benefit to a member while genuinely carrying out its purpose. A NFP can make a profit, but any profit it does make must be allocated towards its purposes.

Source: [www.acnc.gov.au/for-charities/start-charity/not-for-profit](http://www.acnc.gov.au/for-charities/start-charity/not-for-profit), Australian Charities and Not-for-profits Commission.

## Potentially hazardous foods

Are food that must be kept at certain temperatures to minimise the growth of any pathogenic microorganisms that may be present in the food or to prevent the formation of toxins in the food. Examples of foods that are normally considered potentially hazardous include:

- > raw and cooked meat/poultry or foods containing raw or cooked meat/poultry e.g. curries, kebabs, pâté and meat pies
- > foods containing eggs (cooked or raw), beans, nuts or other protein-rich food e.g. batter, mousse, quiche and tofu
- > dairy products and foods containing dairy products e.g. milk, dairy-based desserts, fresh cream or custard filled bakery products (exc. yoghurt as it is acidified)
- > seafood (exc. live seafood) and foods containing seafood e.g. sashimi, cooked prawns
- > sprouted seeds e.g. alfalfa
- > prepared fruits and vegetables e.g. sliced fruits, salads and unpasteurised juices
- > cooked rice and fresh and cooked pasta
- > foods that contain any of the above foods, e.g. burgers, sandwiches, pizzas and sushi rolls.

## More information

For more information on meeting Food Safety Standards, contact your local council Environmental Health Officer or visit [www.sahealth.sa.gov.au/foodsafetymanagement](http://www.sahealth.sa.gov.au/foodsafetymanagement)

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