Food Safety:

The priority classification system for food businesses

A risk-based system designed to classify food businesses into priority ratings based on the risk they present to public health and safety

This information paper outlines the system and describes how to apply it to food businesses

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The Priority Classification System is a scoring system that classifies food businesses into risk categories based on the type of food, activity of the business, method of processing and customer base. Food businesses are assigned a score that relates to one of three priority classifications: high, medium and low. Individual scores for a specified set of risk factors are added to achieve an overall score that determines the priority classification for the food business. State and Territory Governments that implement a food safety program requirement can use the classification system to determine:

1. the food safety program implementation timetable; and

2. the initial audit frequency for food businesses.

The Priority Classification System does not apply to food businesses within the primary industry sector.

2   Background to the system

In July 2000, the Australia New Zealand Food Standards Council (ANZFSC) agreed to the formal adoption of three Food Safety Standards, 3.1.1 Interpretation and Application, 3.2.2 Food Safety Practices and General Requirements and 3.2.3 Food Premises and Equipment into the Australia New Zealand Food Standards Code[1] to replace existing State and Territory hygiene regulations. Nationally consistent implementation of the standards will overcome existing regulatory duplication and overlap between the States and Territories. The standards were gazetted in the Commonwealth of Australia Gazette (No. S464) on Thursday 24th August 2000 and will commence six months from this date.

Standard 3.2.2 Food Safety Practices and General Requirements and Standard 3.2.3 Food Premises and Equipment will require food businesses to:

◗   comply with the requirements for food safety practices and food premises and equipment;

◗   ensure that staff have skills and knowledge in food hygiene and safety matters commensurate with their work activities;

◗   have in place a system for food recall; and

◗   notify the relevant authority about the business.

Standard 3.2.1 Food Safety Programs, which sets out the requirements of a food safety program was put on hold by ANZFSC in October 1999. ANZFSC recommended that a two-year study be undertaken by the Commonwealth Department of Health and Aged Care to assess the cost and feasibility of a mandatory food safety program requirement. While the Territories were generally supportive of a delay

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1   In July 1996 an Agreement between Australia and New Zealand came into effect which established the Australia New Zealand Food Authority. ANZFA is developing joint food standards for both countries to be contained in an Australia New Zealand Food Standards Code. Although the Food Safety Standards will be contained within the Code, they will fall outside the scope of the Agreement and therefore will only apply in Australia. Accordingly the classifications are intended for use in Australia only.

in introducing a mandatory requirement for food safety programs, some States indicated their wish to implement an earlier requirement for food safety programs in their jurisdictions. To minimise the potential for the fragmentation of food safety program requirements between jurisdictions, ANZFSC adopted Standard 3.2.1, in the form of a standard with voluntary implementation at their last next meeting in November 2000

The objectives of the food safety reforms are to provide nationally consistent, efficient and cost-effective regulatory arrangements governing safe and hygienic production, storage, transportation and handling of food. It is anticipated that the reforms will encourage a culture of commitment to food safety in the food industry.

A number of infrastructure initiatives intended to guide the implementation of the Food Safety Standards have been developed. These initiatives include the Priority Classification System for food businesses. The Australia New Zealand Food Authority (ANZFA), in conjunction with Food Science Australia and State and Territory Health Departments, has developed a risk-based system to be used for the classification of food businesses. The system is designed to classify food businesses into priority ratings based on the food safety risks associated with the business.

3 Application of the system

Businesses will be allocated a priority classification by the relevant enforcement agency through a desktop process linked to notification. Businesses will be required to provide information regarding the nature of their business in order to comply with the notification requirements of Standard 3.2.2 Food Safety Practices and General Requirements. Some States and Territories have existing mandatory registration or licensing requirements for food businesses. In these jurisdictions the notification process may be incorporated into any existing arrangements. Where registration does not exist, the notification process will need to be established.

The enforcement agency will use the information supplied by the food business to allocate a priority classification and to notify businesses of their food safety program implementation timeframe and initial audit frequency. Classifications will be assigned using a list of food businesses and corresponding classifications that has been developed by ANZFA in consultation with the States and Territories. The classifications assigned to food businesses have been determined based on the risk factors considered in the Priority Classification System.

The classification of food businesses will occur once in order to support the introduction of a food safety program requirement in the relevant jurisdictions. However, a business classification may be changed by the enforcement agency if it believes that an inappropriate classification has been assigned to the food business. The scoring system will be available to the enforcement agency for reference so agencies can advise food businesses of the basis for the classification that they have been assigned.

Some jurisdictions have indicated that there may also be a role for self-classification of food businesses. ANZFA has agreed to develop, for State and Territory consideration, an appropriate mechanism for self-classification based on the Priority Classification System for food businesses.

4   Why classify food businesses?

Four Food Safety Standards will now be included in the Australia New Zealand Food Standards Code. The classification system will be used to guide implementation of the following requirements of the Food Safety Standards:

◗ If implemented by State and Territory Governments, a food safety program requirement will require food businesses to introduce and maintain food safety programs if they identify one or more hazards in their business. It is recognised that the implementation of food safety programs will need to be phased in by the food industry over a specified time period. The implementation of food safety programs by food businesses will be guided by the Priority Classification System. High-risk businesses are likely to be required to implement food safety programs before medium- and low-risk businesses.

◗ Jurisdictions that introduce a food safety program requirement will also need to implement an audit system infrastructure. The initial audit frequency for food businesses will be based on the same priority classification established for food safety program implementation. The frequency assigned to a food business will be used for subsequent audits until a compliance history can be established. The outcome of two audits will be required to establish a compliance history that may allow the adjustment of audit frequency. The audit frequency model was developed by ANZFA's audit working group (Table 1).

Table 1 The audit frequency model

CLASSIFICATION	AUDIT FREQUENCIES (every x months)		
	Starting point	Maximum	Minimum
Low	18	12	24
Medium	12	6	18
High	6	3	12

5   Factors considered in classification of food businesses

A risk-based classification system aims to classify a food business according to the food safety risks that the business presents. To classify a business in this way, it is necessary to make an assessment of the business against objective criteria and then allocate the business to a priority classification based on how the business rated against the criteria. For practical purposes and equity, it is necessary to have a common set of criteria or risk factors for assessing the risk of individual businesses.

The classification is determined after consideration of the following major risk factors:

◗   food type and intended customer use;

◗   activity of the business;

◗   method of processing; and

◗   customer base.

The system is intended to guide enforcement agencies and provide a consistent approach to food business classification. However, it is the State and Territory Governments that hold the responsibility for food legislation and therefore they have the discretion to use any risk assessment tool that they consider appropriate. For example, some jurisdictions may consider other factors during their risk assessment process, such as the history of compliance with relevant legislation and/or emerging pathogens associated with particular foods, when assigning a classification.

5.1 Food type and intended use by customer

The type of food handled by a food business is important in identifying the hazards that are likely to be present. Some foods are more likely to be contaminated with pathogenic microorganisms and to support their growth. Whether or not the food is intended to be 'ready-to-eat' is also important in determining the severity of the risk. Ready-to-eat food can present a greater risk of causing foodborne illness as it is not intended for further heat processing. Heat processing can destroy any pathogens present in the food.

5.2 Activity of the food business

The amount of handling and whether or not the food is intended to be ready-to-eat are considered in this section and play an important role in determining the potential risk of a food business. Whether or not the food is packaged is also considered.

Businesses that extensively handle the food that they produce are more likely to contaminate food with pathogenic bacteria. If a food business handles unpackaged food the risk of contamination is more likely than if the food is pre-packaged prior to handling by the food business. Again if the food is intended to be ready-to-eat and will not receive further heat processing, it presents a greater risk of causing foodborne illness.

Caterers serving non-shelf-stable food receive an additional score. This is because they prepare and serve food at different locations. The time delay between serving the food and the potential for temperature abuse increases the food safety risks associated with these businesses.

5.3 Method of processing

Processing steps that reduce the level of microorganisms through the application of a well-established pathogen reduction step (such as cooking and pasteurisation) reduce the risk of microbial hazards. Processes that significantly reduce the microbial population (pathogen reduction steps) and are performed by the food business before sale are considered. Businesses using a pathogen reduction step during processing receive a reduction in score.

5.4 Customer base

The number of individuals potentially exposed to a food hazard is an important determinant in assessing the severity of the risk presented by the food business. The number of persons exposed will, in all but fully automated processes, be related to the number of employees required for production. A business producing a large amount of food is likely to employ more people and therefore the business size is used to approximate the size of the exposed population.

Food businesses catering directly to customers such as children under the age of five, the elderly, pregnant women and people with an illness receive an additional score. These groups are vulnerable to foodborne illness and can become very ill from consuming food that is contaminated with low doses of pathogenic bacteria.

6   How the scoring system works

A food business is considered against a specified set of risk factors. Individual scores for each risk factor are added to achieve an overall total score that determines the priority classification for the business. Businesses are assigned a score that relates to one of three priority ratings: high, medium and low.

To determine the feasibility of the Priority Classification System, ANZFA, in collaboration with State and Territory officials, coordinated a trial of the system in South Australia, Tasmania and the Northern Territory. Officers classified food businesses using the system and results indicated that the system produced a consistent classification of food businesses. Feedback received from the trial was used to make refinements to the system and results were used to allocate classifications to food businesses.

7   Key features of the system

◗ Foodborne illness can result from biological, chemical and physical hazards present in food. However, epidemiological evidence suggests that biological hazards (bacteria and viruses) occur most frequently and cause the most severe foodborne illnesses. For this reason, the classification system focuses on the risk of biological contamination when considering food safety risks.
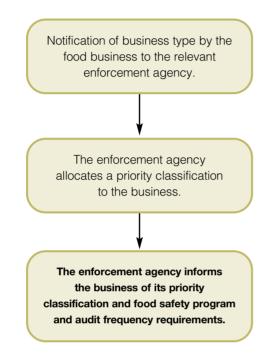
◗ For businesses that handle or process more than one type of food, the food types that present the greatest risks are used to determine the score for that business.

◗ Large businesses with different departments or businesses that are made up of multiple 'businesses' on one premises may receive different priority ratings for each 'business' if it can be demonstrated that each department conducts independent food-handling operations.

◗ Scores for food businesses where more than one food-handling operation is carried out are based on the operation that presents the greatest hazard.

◗ Only businesses directly supplying at-risk groups are given the additional score for vulnerable groups.

◗ The term 'customer' refers to the retail-level customer and food businesses supplied by other businesses or food manufacturers.

◗ When determining the number of employees of a business where casual and part-time employees are involved, their weekly hours are added together and divided by the number of hours per week stipulated in the award for employees of that business. Only staff involved in-food handling operations should be included.

8 How desktop classification will work

◗ Businesses will be required to provide details of the nature of their business when meeting the notification requirements of Standard 3.2.2 Food Safety Practices and General Requirements (Figure 1). The enforcement agency will obtain the information through a series of questions linked to notification.

◗ ANZFA, in consultation with the States and Territories, has developed a list of food businesses and their corresponding classifications for use by the relevant enforcement agency. The enforcement agency will use the information supplied by the food business, combined with the list of food business classifications, to allocate a priority classification.

◗ Food businesses will be notified by the enforcement agency of their priority classification and their subsequent food safety program implementation requirements and initial audit frequency.

◗ Any information supplied by the food business that is used to determine the priority classification will be confirmed during inspection or audit. The food safety auditor will be required to assess the suitability of the initial classification or inform the enforcement agency of any changes to the business or its operations that may indicate that the food business has an inappropriate classification.

Figure 1 Desktop classification of food businesses

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┌─────────────────────────────────┐
│  Notification of business type by the │
│  food business to the relevant       │
│  enforcement agency.                 │
└─────────────────────────────────┘
                │
                ▼
┌─────────────────────────────────┐
│     The enforcement agency           │
│  allocates a priority classification │
│         to the business.             │
└─────────────────────────────────┘
                │
                ▼
┌─────────────────────────────────┐
│   The enforcement agency informs     │
│     the business of its priority     │
│ classification and food safety program │
│   and audit frequency requirements.  │
└─────────────────────────────────┘
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9   The scoring system

9.1 The Priority Classification System for food businesses

This scoring system will be made available to the relevant enforcement agency as a reference which will allow them to explain to food businesses the risk factors considered in allocation of classifications to food businesses. The enforcement agency may use the scoring system to individually classify food businesses if they feel it is appropriate or if an auditor reports that a food business has received an inappropriate classification.

FOOD BUSINESS		PHONE	
ADDRESS		FAX	
PROPRIETOR		DATE	
OFFICER		TIME	

Work through Sections 1 to 4 of the document. Add the scores assigned to the food business in these sections. Use Section 5 to determine the priority rating of the business. Refer to the definitions provided for guidance.

✔ Tick the suitable box in each table

SECTION 1 Food type and intended use by customer

FOOD TYPE AND INTENDED USE BY CUSTOMER	SCORE	✔
High-risk foods that are ready-to-eat	35	
Medium-risk foods that are ready-to-eat	25	
High-risk foods that are **not** ready-to-eat	15	
Medium-risk foods that are **not** ready-to-eat	5	
Low- risk foods that may or may not be ready-to-eat	0	
BUSINESS SCORE		

SECTION 2 Activity of the food business

ACTIVITY	SCORE	✔
High- and medium-risk ready-to-eat foods are handled during processing or manufacturing of food	25	
High- and medium-risk ready-to-eat foods are only portioned before receipt by the customer	20	
Low- risk or non-ready-to-eat foods are handled during processing or manufacturing of food	15	
Storage, distribution or sale of prepackaged food only	5	
BUSINESS SCORE		

Additional points

	SCORE	✔
A catering business prepares and serves food at different locations	15	
BUSINESS SCORE		

SECTION 3 Method of processing

PROCESSING	SCORE	✔
A pathogen reduction step is performed during processing by the food business prior to sale	−10	
A pathogen reduction step is not performed during processing by the food business prior to sale	0	
BUSINESS SCORE		

SECTION 4 Customer base

CUSTOMER BASE	SCORE	✔
The food business is **not** a small business	10	
The food business is a small business	5	
BUSINESS SCORE		

Additional points

	SCORE	✔
Business directly supplies food to at-risk groups	20	
BUSINESS SCORE		

SECTION 5 Priority Classification

RISK	SCORE	✔	BUSINESS SCORE
Low	39 or less		
Medium	40–64		
High	65 or more		

The food business ....

is assigned a priority classification of ....

Proprietor ....

Authorised Officer ....

9.2 Definitions

High-risk food

food that may contain pathogenic microorganisms and will support formation of toxins or growth of pathogenic microorganisms.

Examples are raw meat, fish, oysters, poultry and milk. Other examples include tofu, fresh filled pasta, meat pies, frankfurts, salami, cooked rice and lasagne (these foods pose a particularly high risk if they are not processed or cooked adequately).

Medium-risk food

food that may contain pathogenic microorganisms but will not normally support their growth due to food characteristics; or

food that is unlikely to contain pathogenic microorganisms due to food type or processing but may support formation of toxins or growth of pathogenic microorganisms.

Examples are fruits and vegetables, orange juice, canned meats, pasteurised milk, dairy products, ice cream, peanut butter and milk-based confectionery.

Low-risk food

food that is unlikely to contain pathogenic microorganisms and will not normally support their growth due to food characteristics.

Examples are grains and cereals, bread, carbonated beverages, sugar-based confectionery, alcohol and fats and oils.

Activity of the food business

handling of food that is required to achieve the final product sold by the food business. This may or may not result in changes to the physical or chemical characteristics of the food.

At-risk/vulnerable populations

defined for these purposes as children under the age of five, adults aged over 65, the sick and immunocompromised, and pregnant women.

Food

includes: any substance or thing of a kind used, or represented as being for use, for human consumption (whether it is live, raw, prepared or partly prepared), an ingredient or additive in a substance for human consumption, a substance used to prepare a substance for human consumption such as a processing aid, chewing gum and its ingredients or additives or any substance or thing declared to be a food under section 3B of the Australia New Zealand Food Authority Act 1991.

Food business

means a business, enterprise or activity (other than primary food production) that involves the handling of food for sale or the sale of food, regardless of whether the business, enterprise or activity concerned is of commercial, charitable or community nature or whether it involves the handling or sale of food on one occasion only.

Food-handling operation   means any activity involving food handling.

Food premises   means any premises (including land, vehicles, parts of structures, tents, stalls and other temporary structures, boats, pontoons and any other place declared by the relevant authority to be a premises) kept or used for handling food for sale, regardless of whether those premises are owned by the proprietor, including premises used principally as a private dwelling but does not include vehicles used to transport food or food vending machines.

Handling   of food includes the making, manufacturing, production, collection, extraction, processing, storing, transporting, delivering, preparing, treating, preserving, packing, cooking, thawing, serving or displaying of food.

Pathogen reduction step   a processing step that significantly reduces the microbial population present in a food material. This may be canning, cooking, fermentation or pasteurisation or any other processing step that is capable of significantly reducing the level of pathogens present.

Processing   in relation to food, means activity conducted to prepare food for sale including cooking, drying, fermenting, heating, pasteurising, thawing and washing, or a combination of these activities.

Proprietor   means the person carrying on the food business or, if that person cannot be identified, the person in charge of the food business.

Ready-to-eat food   means food that is ordinarily consumed in the same state as that in which it is sold and does not include nuts totally enclosed in the shell or whole fruit and vegetables intended for further processing.

Small business   a business that employs less than 50 people in the 'manufacturing' sector or which employs less than 10 people in the 'services' sector.

10 How food businesses should be rated

This section provides some examples of food businesses and the priority classification that they could expect to receive. The list will need to be expanded to cover all food businesses. Businesses scoring less than 40 points were assigned a low classification. Businesses scoring between 40 and 64 points were assigned a medium classification. Businesses scoring more than 65 points were assigned a high classification.

10.1 Examples

These worked examples reflect the application of the Priority Classification System to food businesses. The examples classify types of food businesses based on the scores allocated to the risk factors shown in the scoring system (Section 9.1).

RTE = ready-to-eat
LR = low-risk
MR = medium-risk
HR = high-risk

Food Business	Food type	Activity	Caterers	Method of processing	Customer base	At-risk groups	SCORE	PRIORITY CLASS'N
LOW-RISK BUSINESSES								
Bakery producing LR food e.g. bread and cakes	0	15		−10	5		10	low
Bar selling LR food e.g. chips and nuts	0	5			5		10	low
Biscuit manufacturer	0	15		−10	10		15	low
Boning room	15	15			5		35	low
Brewery	0	15			10		25	low
Butcher	15	15			5		35	low
Carbonated beverage manufacturer	0	15			10		25	low
Child care centre supplying LR food e.g. confectionery	0	5			10	20	35	low
Confectionery (sugar-based) manufacturer	0	15		−10	10		15	low
Confectionery (sugar-based) store	0	15			5		20	low
Flour mill and cereal food manufacturer	0	15			10		25	low
Fruit stall selling whole/ uncut fruit	5	15			5		25	low

Food Business	Food type	Activity	Caterers	Method of processing	Customer base	At-risk groups	SCORE	PRIORITY CLASS'N
Grocery section of a supermarket selling LR food e.g. bread and packaged foods	0	5			10		15	low
Low pH sauce manufacturer	0	15		−10	10		15	low
Liquor manufacturer	0	15			10		25	low
Liquor shop	0	5			5		10	low
Milk vendor	25	5			5		35	low
Oil and fat manufacturer	0	15			10		25	low
Service station selling MR RTE food e.g. milk and orange juice	0	5			5		10	low
MEDIUM-RISK BUSINESSES								
Abattoir	15	15			10		40	medium
Bakery producing HR cooked food e.g. pies and quiches	35	25		−10	5		55	medium
Café* (small business) serving HR RTE cooked food e.g. meat pies and lasagne	35	25		−10	5		55	medium
Canned meat manufacturer	25	25		−10	5		45	medium
Chocolate manufacturer	25	25		−10	10		50	medium
Dairy section of a supermarket	25	5			10		40	medium
Dairy/milk factory (pasteurised products)	25	25		−10	10		50	medium
Delicatessen (not manufacturing smallgoods)	35	20			5		60	medium
Deli section of a large supermarket	35	20			5		60	medium
Fruit stall selling cut fruit	25	20			5		50	medium
Fast-food chain (large)	35	25		−10	10		60	medium
Hot dog vendor	35	25		−10	5		55	medium
Ice cream manufacturer	25	25		−10	10		50	medium
Orange juice manufacturer (unpasteurised)	25	25			10		60	medium
Peanut butter manufacturer	25	25		−10	10		50	medium
Poultry processing	15	15			10		40	medium
Restaurant (large business) serving HR RTE cooked food e.g. meat and pasta dishes	35	25		−10	10		60	medium

Food Business	Food type	Activity	Caterers	Method of processing	Customer base	At-risk groups	SCORE	PRIORITY CLASS'N
Restaurant (large business) serving MR RTE uncooked food e.g. prepared salads	25	25			10		60	medium
Salad/ vegetable producer producing RTE salads	25	25			5		55	medium
Sausage sizzle	35	25		−10	5		55	medium
School canteen serving HR RTE cooked food e.g. pies and sausage rolls	35	25		−10	5		55	medium
Seafood processing (not RTE)	15	15			10		40	medium
Service station selling HR RTE food e.g. pies and sausage rolls	35	20		−10	5		50	medium
Take-away store selling HR RTE cooked food e.g. fish and hamburgers	35	25		−10	5		55	medium
HIGH-RISK BUSINESSES								
Airline caterer	35	25	15		10		85	high
Catering company (large business) serving HR RTE uncooked food e.g. oysters and smoked salmon	35	20	15		10		80	high
Child care centre serving HR RTE cooked food e.g. frankfurts and rice	35	25		−10	10	20	80	high
City hotel/Restaurant (large) serving HR RTE uncooked food e.g. oysters	35	25			10		70	high
Hospital caterer	35	25			10	20	90	high
Nursing home	35	25			10	20	90	high
Meals on Wheels	35	25		−10	5	20	75	high
Salami manufacturer (small business)**	35	25		−10	5		55	high
Seafood processors producing HR RTE uncooked food e.g. oysters and cold smoked seafood	35	25			5		65	high

* covers small restaurants, taverns and pubs
** Salami manufacturers have been classified as high risk at the request of the State and Territory Health Departments.