# CVIG additions

# Food allergens

One of the main drivers for this current project has been the need to address allergen management in food processing, especially given that the data on recent food product recalls in Australia are predominantly allergen related ([www.foodstandards.gov.au/industry/foodrecalls](http://www.foodstandards.gov.au/industry/foodrecalls)). Stakeholders have provided a consistent message to say that allergens need to be addressed through food safety. Typically, food allergen management has not been considered part of food safety and there needs to be a cultural shift to ensure that allergens are included under this banner. To that end, many units of competency have had requirements around food safety updated to include allergen management. This is an important change that must be addressed in the training and assessment for the units that have been updated (see unit mapping for details).

Further to updates in current units, the following new units have been developed:

* FBPFSY4XX1 Perform an allergen risk review
* FBPFSY4XX2 Provide accurate food allergen information to consumers
* FBPFSY5XX1 Develop an allergen management program
* FBPFSY5XX3 Plan to mitigate food fraud.

These new units will be added to the elective banks of the following existing qualifications:

* FBP40418 Certificate IV in Food Science and Technology
* FBP50118 Diploma of Food Science and Technology
* FBP40619 Certificate IV in Artisan Fermented Products
* FBP50319 Diploma of Artisan Cheesemaking
* FBP50218 Diploma of Food Safety Auditing

A new skill set has also been developed to manage food allergens:

* FBPSSXXXX01 Manage allergens in food processing.

## The language of allergens

It’s important to note some of the language used around food allergen management. In some contexts, allergens are treated as a ‘contaminant’, like physical, microbiological or chemical contaminants in food processing. The Allergen Bureau takes the approach that some products may be allergenic to some people and not others, and that often allergens are an intended ingredient in a processed food product. The VITAL (Voluntary Incidental Trace Allergen Labelling) Program is a standardised allergen risk assessment process for food industry, developed by the Allergen Bureau**.**

*The VITAL Program produces a ‘labelling outcome’ that summarises the food allergens present in a food due to intentional inclusion as part of a recipe and where food allergens, present due to cross contact, should be included (or not) on the label in the form of the precautionary statement****‘May be present: allergen x, allergen y.’*** ([http://allergenbureau.net/vital](http://allergenbureau.net/vital/)).

The Food Industry Guide to Allergen Management and Labelling, 2019, developed by the Australian Food and Grocery Council also explains:

*Allergen risk review (as defined by the Allergen Bureau) is the thorough investigation of the allergen status of a food product. The investigation process identifies the presence of allergens that are intentionally formulated into a product and quantifies the risk of allergens which may be unintentionally present (cross contact allergens). This information can be used to create or update an AMP or for making allergen labelling decisions. (*<https://www.afgc.org.au/wp-content/uploads/2019/10/FINAL-Food_Industry_Guide_to_Allergen_Management_and_Labelling_ANZ_2019_VD3.pdf>)

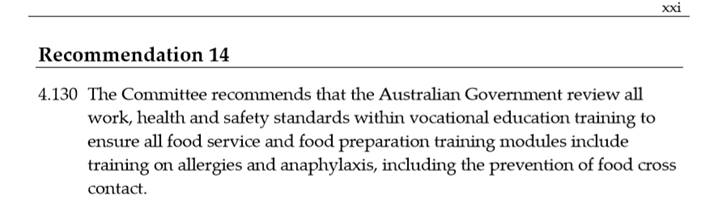
Both guides (the Food Industry Guide to the VITAL Program, Version 3.0 and the Food Industry Guide to Allergen Management and Labelling) note the following definition:

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| *Cross contact allergen:* | *a residue or other trace amount of a food allergen that is unintentionally incorporated into another food. Cross contact sources can be from ingredients, raw materials, personnel, inadequate cleaning of equipment, or concurrent and/or co-located plants.* |

Based on this information, the new and revised units of competency included in the FBP Food, Beverage and Pharmaceutical Training Package, Version 5.0, refer to ‘cross contact allergens’ rather than allergens as ‘contaminants’, wherever possible.

## Parliamentary enquiry into allergens

During the project to develop units that address allergen management, the Parliamentary Inquiry into allergies and anaphylaxis. The recommendations in the final report include the following:



# The final report from the inquiry, titled ‘Walking the allergy tightrope’, is available at <https://www.aph.gov.au/Parliamentary_Business/Committees/House/Health_Aged_Care_and_Sport/Allergiesandanaphylaxis/Report>.

# Traceability

Another driver for this current project has been to address the issue of traceability. This driver also relates to high number of food recalls and the need for workers to understand how traceability systems are incorporated into operational food processing roles. To that end, the following units of competency have been developed within this project:

* FBPFSY3XX2 Participate in traceability activities (included in the core of the FBP30120 Certificate III in Food Processing)
* FBPFSY4XX4 Conduct a traceability exercise
* FBPFSY5XX2 Design a traceability system for food products.

As with the allergen-focussed units, these traceability-focussed units will be added to the elective banks of the following existing qualifications:

* FBP40418 Certificate IV in Food Science and Technology
* FBP50118 Diploma of Food Science and Technology
* FBP40619 Certificate IV in Artisan Fermented Products
* FBP50319 Diploma of Artisan Cheesemaking
* FBP50218 Diploma of Food Safety Auditing

A skill set has also been created:

* FBPSSXXXX02 Check traceability of food products.

# General Manufacturing Practice (GMP) units

The revised versions of the FBP20X20 Certificate II in Food Processing and the FBP30120 Certificate III in Food Processing now include core units that cover GMP:

* FBPOPR2XX1 Follow procedures to maintain Good Manufacturing Practice in food processing FBPOPR3X16
* Apply Good Manufacturing Practice requirements in food processing.

These units have been developed and added to qualifications in response to stakeholder feedback, highlighting that more and more purchasers of processed food products (e.g. supermarkets) require compliance with both GMP and HACCP quality systems. There was some discussion around the term ‘GMP’ vs ‘prerequisite programs’ and most stakeholders agreed that the term GMP was more broadly used and provides the appropriate focus for units of competency.

Some stakeholders provided feedback to say that the new GMP units duplicated some content included in the food safety units. Industry representatives confirmed ???????????????TBC

# Target audience for qualifications

The FBP1XX20 Certificate I in Food Processing is designed for workers that are new to the food processing industry, and who will work under direct supervision.

The FBP20X20 Certificate II in Food Processing is targeted at those who work in food or beverage processing carrying out operational type tasks under general supervision.

The FBP30120 Certificate III in Food Processing is targeted at those who work in operational roles in larger food processing site, where the work is mainly automated and large scale. This does not preclude the qualification being delivered to those who work in smaller, more artisanal settings, providing the selection of units suits the client need and can be assessed in appropriate setting, as specified in the Assessment Conditions of each unit.

# Transitioning delivery

Several units that were coded at AQF2 have been updated to reflect AQF3. All units that have undergone this change are deemed as equivalent to the previous version. This may impact on learners that are currently enrolled in the previous version of the qualification (FBP20117 Certificate II in Food Processing). If learners are not scheduled to complete training and assessment for the previous qualification before the transition date (12 months after endorsement), then RTOs will need to utilise the mapping information and identify whether learners will be transitioned into the FBP20120 Certificate II in Food Processing or the FBP30120 Certificate III in Food Processing, depending on which units have been selected for delivery.

# ‘Batches’ for assessment

The Assessment Requirements of many processing-based units of competency require the candidate to “…produce at least one batch of [product] to meet specifications”. The size of a batch, or the length of time taken to produce one batch will vary enormously for different products over different contexts. Some batches are small and produced in a few hours, others run over several days. The point of the requirements is for candidates to be assessed operating processing equipment for long enough to be able to cover all the elements and performance criteria in the units, to resolve problems as they arise, and to produce a ‘reasonable amount’ of product to ensure that it consistently meets the product specification. How much is a ‘reasonable amount’ will sometimes need to be determined by assessors, where a batch run covers several days.

The requirement must be more rigorous than turning equipment on for a short time and turning it off.

Assessors do not need to be present to watch the production of a whole batch, but they must observe key skills identified for assessment in the Performance Evidence. Where assessors cannot observe the performance of the production of a whole batch, the assessment may be supported by third party reports provided by a workplace supervisor.

# Assessment Conditions

The Assessment Conditions specify that the assessment of skills must be carried out in a *‘food processing [or other specific] workplace or an environment that accurately represents workplace conditions’.* This means an environment that is an actual workplace, or an environment that replicates a workplace fitted out with real work-like processing equipment, health and safety equipment, standard operating procedures, and workplace policies and procedures. This environment is not a domestic kitchen.

The information included in the Assessment Conditions field of Skills Impact Assessment Requirements, has a standard layout:

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| Assessment of skills must take place under the following conditions:   * physical conditions: * *[e.g. a food processing workplace or an environment that accurately represents workplace conditions]* * resources, equipment and materials: * *[e.g. raw product]* * *[e.g. use of specific tools]* * *[e.g. use of specific items of personal protective equipment]* * specifications: * *[e.g. use of specific workplace documents such as policies, procedures, processes]* * *[e.g. use of manufacturer’s operating instructions for specific equipment, machinery, etc.]* * *[e.g. use of workplace instructions/job specifications/client briefs]* * relationships: * *[e.g. client(s), customer(s)]* * *[e.g. team member(s), supervisor(s)]* * timeframes: * *[e.g. according to time specified in job sheet].*   Assessors of this unit must satisfy the requirements for assessors in applicable vocational education and training legislation, frameworks and/or standards. |

Through this project stakeholders have questioned the dot point that says ‘relationships’, saying that candidates do not really ‘build relationships’ with those identified under the dot point. The ‘relationships’ dot point is really intended to introduce the dot point/s below, so in some Food Processing units, what’s required is that the candidate has interactions with his/her supervisor or with team members.