



# Food & Beverage Processing project

## Summary of Feedback, Responses and Actions – Drafts Available public consultation 2

### October 2020

Draft qualifications, units of competency and skill sets for the Food & Beverage Processing project were made available on the [Skills Impact website](#) for a second round of stakeholder review from 24 June – 9 August 2020. Please visit the website to view a full list of the documents that were submitted for consultation during this phase. Feedback was received from a variety of stakeholders around the country via email, the Skills Impact Feedback Hub, at webinars, via phone and email, as follows:

	ACT	NSW	NT	Qld	SA	Tas	Vic	WA	National
<b>Industry (employer / employee)</b>									
<b>Industry association (includes feedback from Industry Advisory Bodies)</b>									*
<b>Union</b>									
<b>Registered Training Organisation (RTO)</b>									
<b>Government department</b>									

*\*Note: two organisations have been included in the “Industry Association” category for the purposes of this report, but it should be noted these organisations are classified as Health Peak Advisory Bodies. General note: Feedback received from a national industry association and an Industry Training Advisory Body, as well as research undertaken by the project team, indicates no relevant stakeholders in the Northern Territory and Australian Capital Territory.*

Below is a summary of the feedback raised during the second consultation phase for the draft qualifications, units of competency and skill sets developed and reviewed for the Food & Beverage Processing project, and how these have been dealt with. This involves a consideration of the information provided, views of industry stakeholders and from people who are part of the Subject Matter Expert Working Group process. Resolutions are constructed to consider the needs and views of stakeholders to the extent possible, and to comply with the *Standards for Training Package 2012*. The resolutions may represent a compromise on one or more stakeholder views with the aim of a workable outcome for industry, State and Territory Training Authorities (STAs) and training providers.

These draft documents will be made available once more during the public Validation phase, due to take place November/December 2020. Please visit the [Skills Impact website](#) to view and validate these documents.

**Acronyms - PC – Performance Criteria, PE – Performance Evidence, KE – Knowledge Evidence, AC – Assessment Conditions, SMEs – Subject Matter Experts, CVIG – Companion Volume Implementation Guide, FBP – Food, Beverage and Pharmaceutical**

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# Summary of feedback on draft qualifications

## Certificate I in Food Processing

Note: the updated *Certificate I in Food Processing* was discussed during consultation webinars where no issues were raised.

### Comments related to suitability of Certificate I in Food Processing

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO - Vic	In the Group B units there is a unit listed twice, was there meant to be a different unit listed? (unit FSKRDG004 Read and respond to short and simple workplace information)	Adopted - duplication deleted.

## Certificate II in Food Processing

Note: the draft made available during the second public consultation phase included a new Good Manufacturing Practice (GMP) unit in its core, which was added based on feedback received during the first public consultation phase. In feedback received during this second public consultation phase, stakeholders highlighted a potential overlap of content in the core due to the addition of the new GMP unit. A mapping exercise was undertaken to investigate this, the final draft of this qualification is proposed to remove *FBOPR2070 Apply quality systems and procedures* unit from the core in order to address this overlap.

### Comments related to Core Units (including suggested additional core units)

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry Association - WA	<i>RE: Qualification description</i> Good description. although many fp [food processing] workers operate machines as well as use equipment.	Adopted - description updated to include machinery and/or equipment.
	<i>RE: Qualification description - specialist components</i> Or perhaps just 'Units'?	Noted, but the 'components' include units, qualifications and skill sets, so just including 'units' would be limiting.
	<i>RE: Packaging Rules</i> Given this Cert is most commonly used for CALD employees I would suggest that more flexibility to use other Units from other	Noted. We're trying to find the balance between allowing enough flexibility to suit a wide range of audiences and not so flexible that the food processing context is lost. There are 4 FSK units that can be chosen from

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	TPs (including Foundation Skills) would be desirable. Especially as pallet truck and forklift operation are not included in A or B. Reduce the core?	Group A and 3 extras could be chosen using the '3 from any other training package' rule, which seems reasonable (or 6 FSK and one that focusses on forklift/pallet truck operation).
	RE: Core Units Why this unit and FBPOpr2XX1 as core? same, same but different?	Noted. The GMP unit is different to <i>FBPOPR2070 Apply quality systems and procedures</i> . But a mapping exercise has revealed quite a bit of overlap between FBPOPR2070 and FBPFSY2001, so FBPOPR2070 has been moved to the elective bank. Additional content addressing this will be provided in the FBP CVIG.
	<i>RE: Core Units - FBPOPR2XX1</i> Is this a proprietary product? The capitalisation implies that it is. If so not all manufacturers will use it.	General Manufacturing Practice is an internationally recognised term. This unit has been developed and added to core following feedback from many stakeholders during Draft 1 of the qualification. Additional content addressing GMP will be provided in the FBP CVIG.
	<i>RE: Elective Units Group A - MSS402080 Undertake root cause analysis</i> Seems a bit advanced for Cert II level.	Noted. This elective unit is coded at AQF level 2 (the 2 denotes the AQF level - 402080) so is suitable for inclusion.
	<i>RE: Elective Units Group A - FBPOPR2XX2 Carry out manual handling tasks</i> I have no problem with this Unit being included but it begs the question of what about non-manual handing eg, pallet truck, forklift operations etc?	Noted. Forklift/pallet truck operations are licensed job tasks and the units for these tasks sit higher than AQF2, but (where appropriate) the units could still be chosen to be part of the qualification through the flexible packaging rule (3 from anywhere as long as the unit contributes to an industry-supported outcome).
Industry - Qld	<i>RE: inclusion of GMP unit in core</i> I think it's a no-brainer [that there should be something about GMP in there]	Noted – thank you for the feedback.
RTO – Vic	Qual/Food safety and GMP as core units in the Cert II, is there too much overlap?? We think there is too much overlap for a Cert II level, needs reviewing.	Adopted. A mapping exercise has revealed quite a bit of overlap between FBPOPR2070 and FBPFSY2001, so FBPOPR2070 has been moved to the elective bank. There remains <i>some</i> cross-over between food safety unit and GMP unit in the core, however each unit exists to cover separate but different requirements. Additional content addressing this will be provided in

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
		the FBP CVIG. Units (or parts of units, particularly the KE) could also be combined for delivery).

## Certificate III in Food Processing

### Comments related to Core Units

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic/NSW	RE: Core Units - traceability I believe the FBPFYSY3XX2 should not be a CORE Cert 3 unit.	Noted. Throughout the process of reviewing this qualification there has been a clear message from industry representatives that the unit should be core.
	RE: Core Units Don't believe at a Cert 3 level that GMP should be a core unit. Should be a General Elective.	Noted. Throughout the process of reviewing this qualification there has been a clear message from industry representatives that the unit should be core.
	RE: Core Units I believe GMP at Cert 3 level should be an elective not a CORE or use the Cert 2 GMP as the CORE for Cert 3.	Noted. Throughout the process of reviewing this qualification there has been a clear message from industry representatives that the unit should be core. A unit tagged as having AQF3 complexity seems appropriate for Certificate III and overall alignment of the qualification must be justified under the Standards for Training Packages 2012.
	RE: Group J - Sales BSBCUS301 Deliver and monitor a service to customers Agree with User 41 - should be general electives	Noted. The units can be chosen as electives, regardless of which group they sit within (wording of packaging rules updated). Sales specialisation is useful for some users.
RTO – Vic/NSW	RE: GMP unit in core GMP should absolutely be there, it is a cornerstone of manufacturing	Adopted.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry association – National	Food allergens unit not in core anymore. Is food allergen management included in any core unit though?	Noted. Whilst the allergens-specific unit has been moved out of the core, allergens requirements have been checked and strengthened within the content of units that appear in the core of qualification, and within other relevant elective units. In addition, information about allergens has been included in the CVIG.
RTO – SA	The traceability unit and GMP unit – do they really need to be in the core at a Cert III? Don't see the benefit of it. Just because a driver for the project, doesn't mean they need to be core. The units are pitched at a reasonably high level.	Noted. Throughout the process of reviewing this qualification there has been a clear message from industry representatives that all workers/operators should know about GMP and traceability. Units pitched at AQF3 and the overall alignment of qualification needs to match the targeted AQF level (and this is checked through the Quality Assurance process, under the Standards for Training Packages 2012).
	<p>The level 2 food safety unit has been removed from the core, so if people are walking into food processing and they've never worked with food before (because there's no entry requirements in this qualification), it's way above their head. They're expected to have a lot of underpinning knowledge and they just won't have it, which is unfortunate.</p> <p>We don't always have the option of putting them into a Certificate II first, it's what the employer wants and they should have that choice.</p> <p>The Cert II Food Safety unit has been in the Certificate III qualification for a very long time. There may be an overlap between Cert II and Cert III and they'd be in training for a very long time which is not feasible.</p>	Noted. The AQF2 food safety unit used to be a prerequisite for the AQF3 food safety unit, and that is no longer the case. All training package qualifications must be appropriately aligned to the target AQF level, according to the Standards for Training Packages 2012 (and nested units/qualifications need be removed). Note the new skill set 'FBPSSXXX05 Supervised Food Processing Operator Skill Set' could be a pathway into the Certificate III.
RTO – Vic	GMP new unit is OK however because FSY3001 is also a core, anywhere where there is repetition could it be removed from FPBFSY3001. We see FSY3001 as the building block to GMP so just removing the crossover would be good.	Adopted. Repetition removed where possible. Also see note about cross-over of content in CVIG.

## Comments related to Elective Units & Specialisations

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry association – WA	<i>RE: Group J Sales</i> I don't see any need for a sales specialisation. Just include these Units in the General electives.	Noted. Sales specialisation is useful and appropriate for some users.
	<i>RE: Group M Other Electives (AQF2)</i> All the current FBPGRA2xxx Units are missing - many are required for stockfeed processing, esp FBPGRA2002. I haven't checked the FBPPBK2 units.	Noted. The units have been temporarily withdrawn from the Food Processing project to be worked on in the <a href="#">Flour milling/High Volume Production Baking projects</a> . They will be 'returned' to the qualification on completion of those projects.
Industry – SA	<i>RE: recommendation for new unit</i> There has been a lot of process in recent years on anti-product fraud and supply chain integrity technology - a new unit would be useful	Noted and suggested for Skills Forecast, thanks. Note there is a unit about food fraud at AQF 5.
Gov – SA	Is there anything in the Sales specialisation around online sales? Given current environment and when we might get out of it – online sales are currently very important? The Retail Training Package has an “Online Retail Coordination” skill set that might have some units suitable for this specialisation.	Adopted. <i>SIRXCEG006 Provide online customer service</i> added to specialisation.
Gov – WA	Recommend including FBPGRA units into the Stockfeed specialisation in the <i>FBP30120 Certificate III in Food Processing</i> .	Noted. The units have been temporarily withdrawn from the Food Processing project to be worked on in the <a href="#">Flour milling/High Volume Production Baking projects</a> . They will be 'returned' to the qualification on completion of those projects.
Industry Association – National	<i>RE: Stockfeed specialisation</i> Positive step in having a unit to cover fish feed production	Noted - thanks for the confirmation.

## General Qualification comments

<b>Stakeholder Comments and Identified Issues</b>		<b>Consideration and Proposed Resolution</b>
RTO – Vic	Cert III looks great	Noted - thank you for the feedback.
Gov – WA	Support the merging of the Food Processing (Sales) qualifications with the new FBP20120 Certificate II in Food Processing and FBP30120 Certificate III in Food Processing.	Noted - thank you for the feedback.
Industry Association – National	Very happy with what has been presented. We believe the core and elective units are suitable for the sectors it covers. The addition of a GMP unit is a positive step. It seems to cover everything required, is of a reasonable standard, and appropriate to the right level.	Noted - thank you for the feedback.

## Summary of feedback on draft Skill Sets

Note: Two additional skill sets have been created to support activities related to introducing and inducting new learners into a food processing environment.

### FBPSSXXX03 Food processing induction Skill Set

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry Association – National	Happy with what has been proposed	Noted - thank you for the feedback.

### FBPSSXXX04 Introduction to food processing Skill Set

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry Association – National	Happy with what has been proposed	Noted - thank you for the feedback.

## Summary of feedback on draft Units of Competency

The focus for this second round of public consultation were on units of competency that required additional feedback due to significant changes having been made since the first draft, or that were developed after the first round of drafts. Units from the first round of drafts were still made available during this period, and responses to those units can be found [further below](#).

### Additional new units

These units of competency were developed *after* the first round of public consultation.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
<b>FBPOIL3XX9 Clean and mill olives</b>		
No feedback requiring action.		
<b>FBPOIL3X10 Operate and monitor a malaxer</b>		
No feedback requiring action.		
<b>FBPOIL3X11 Operate and monitor an olive oil separation process</b>		
No feedback requiring action.		
<b>FBPOIL3X12 Operate and monitor storage of virgin olive oil</b>		
No feedback requiring action.		
<b>FBPOPR2XX1 Follow procedures to maintain Good Manufacturing Practice in food processing</b>		
Industry – National/Qld	RE: PC 2.2 Remove 'and contamination prevention clothing'	Adopted.
RTO – Vic	RE: PE I can't see how we can provide examples of all people removing make up when a lot don't wear it,	Adopted. Dot points removed from PE and reference made to make up, poor personal hygiene and staff illness in KE.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	also same with jewellery and what if a person isn't feeling ill during the unit being assessed.	
RTO – Tas	<i>RE: PE</i> If you are not a wearer of makeup (more than half of the workers) and hadn't had a sick day, then how would you provide evidence of doing this at least once?	
RTO – Vic/NSW	<i>RE: PE</i> Agree with [both comments above] - I think it's important the student is aware of the potential contamination make-up can cause, but the removal of make-up should already be done prior to attending work.	
RTO – Tas	This would be better as an elective unit.	Noted. The unit has been added to the core in response to many stakeholders providing feedback that the unit should be core (From Draft 1).
	<i>RE: PCs 1.1, 1.2 &amp; 1.3</i> If you are ESL or have low LLN skills this will be more problematic. If the workplace is very small (less than 10 people) sometimes this is not easily available to the workers - is in the owner's main office. They comply with the regs, but may not be able to locate them.	Noted. Identifying sources of information and knowing the specific GMP requirements for own work is essential. PCs remain as they are.
RTO – Vic/NSW	<i>RE: PCs 1.1, 1.2 &amp; 1.3</i> In response to [comment above], if the skills are to be transferable then the ability to understand GMP is important in my opinion. I'd also suggest that a	Noted and agreed. PCs remain as they are.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	"supported" program from the employer would enable access to GMP easily	
Industry Association – National	this reflects the skills and knowledge required and are set at the right knowledge level	Noted - thank you.
<b>FBPOPR3X16 Apply Good Manufacturing Practice requirements in food processing</b>		
Industry – National/Qld	<i>RE: PC 1.1</i> add '& beverage' to the end of PC 1.1	Adopted.
	<i>RE: PC1.2</i> I am not sure what you mean by global harmonisation and food processing licences?	Adopted - wording of PC updated to clarify intent. New PC reads: 1.2 Locate sources of information relevant to work role relating to current global harmonisation of GMP compliance and food processing licences.
	<i>RE: PC2.2</i> insert '& beverage' e.g. food & beverage processing	Adopted.
	<i>RE: PC 3.1 &amp; 3.2</i> 3.1 keep 3.2 record test results, observations or data according to workplace reporting procedures and GMP requirements	Adopted.
	<i>RE: PC4.1 Biosecurity</i> Biosecurity??? Not really applicable to GMP in food manufacturing context	Adopted - Element 4 removed.
	<i>RE: PC5.1 Contamination</i> Maybe 5 needs to come before 3 for follow? Apply the GMP stuff, then record the events? After	Adopted.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution	
	reading this, I suggest keeping all of 5 and deleting 3 and 4 all together	
	<p><i>RE: Elements 5 &amp; 6</i> Thinking that 6 needs to come before 5. You could include something about complying with workplace uniform policies</p>	Adopted.
	<p><i>RE: PE</i> insert 'and beverage' after 'requirements to food....'</p>	Adopted.
	<p><i>RE: PE bullet point 3</i> remove 'and reports'</p>	Adopted.
	<p><i>RE: PE bullet point 4</i> Insert 'observation' between 'recording calculations' and 'and test results'</p>	Adopted.
	<p><i>RE: PE bullet point 5, sub bullet 2</i> replace 'components' with 'materials'.</p>	Adopted.
	<p><i>RE: PE bullet point 8</i> remove 'of raw materials and ingredients'.</p>	Adopted.
	<p><i>RE: KE bullet point 9</i> add 'or shared equipment', delete ' concurrent and /or located plants.</p>	Adopted.
	<p><i>RE: KE bullet point 12 - including</i> Including is intended to be example? This is just a</p>	Adopted - dot points removed.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	general question as the list can be quite long with respect to GMP policies and requirements	
	<i>RE: KE bullet point 16</i> Replace 'components' with 'materials'.	Adopted.
	<i>RE KE bullet point 19 - labelling</i> What does this mean?	Adopted – unnecessary dot point removed.
	<i>RE: KE bullet point 20 - sub bullet 7</i> Significance of 'certifying' Not applicable in food processing	Adopted - dot point removed.
	<i>RE: Assessment Conditions</i> Remove 'workplace biosecurity requirements'	Adopted - dot point removed.
RTO – NSW/Vic	<i>RE: KE</i> Where applicable to job role	Adopted - dot point removed.
	<i>RE: KE</i> Would recommend removing	Adopted - dot point removed.
	<i>RE: PE</i> Reference to make up should be removed	Adopted - dot point removed.
	<i>RE: PCs 6.1 &amp; 6.2</i> 6.2 is already a part of 6.1	Adopted - PCs combined (now Element 3).

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<p><i>RE: PC 1.2</i> 99% of employers and students will have no concept of what global harmonisation is</p> <p><i>RE: PC 1.2 (Agree with comment above)</i></p>	Adopted - reference removed from PC.
	<p><i>RE: PE</i> There are no guarantees this will occur; most food manufacturers have regular QC calibration checks and adjustments accordingly performed by the QA team</p> <p><i>RE: PE</i> If a company's QA system is very good, they may never have to identify out – of - calibration equipment? So need to explain the company procedure for reporting?</p> <p><i>RE: PE</i> Agree with [comment above] concerned with reference to specifics. GMP requirements as per work site SWI or SOP or GMP procedures.</p>	Adopted - reference to calibration removed from PC.
RTO – Tas	<p><i>RE: Application</i> Ok as an elective - existing Food Safety core unit covers off general GMP to a reasonable extent. More to do with production than packing requirements.</p>	Noted. Unit has been added to core in response to feedback from Draft 1, from many stakeholders.
RTO – NSW/Vic	<p><i>RE: Application</i> Agree with [comment above]. 'Ok as an elective - existing Food Safety core unit covers off general GMP to a reasonable extent.</p>	

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	More to do with production than packing requirements'.	
Industry Association – National	This reflects the skills and knowledge required and are set at the right knowledge level	Noted - thank you.

### Units with additional revisions

These units had additional changes made to them since the first round of consultation.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
<b>FBPBEV3XX3 Operate and monitor a brewery fermentation process</b>		
RTO – Vic	<i>RE: splitting of FBPBEV3XX3 and FBPBEV3XX7</i> That's perfect	Noted - thank you.
<b>FBPBEV3XX7 Operate and monitor a beer maturation process</b>		
RTO – Vic	Fermentation and maturation now that they are separated are great and will work perfectly for us.	Noted - thank you.
<b>FBPBPG3XX3 Operate and monitor a form, fill and seal process</b>		
No feedback requiring action.		
<b>FBPBPG3XX5 Operate and monitor a high speed wrapping process</b>		

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
No feedback requiring action.		
<b>FBPFSY1001X Follow work procedures to maintain food safety</b>		
Industry – National/Qld	The reference to allergens as contaminants in food is not in line with industry best practice. Some foods that people have an allergic reaction to are actually ingredients in processed food products.	Adopted. References to allergens as ‘contaminants’ removed and replaced with ‘cross-contact allergens’, in line with approach from Allergen Bureau. Information also added to CVIG to highlight the issues to users.
<b>FBPFSY2001 Implement the food safety program and procedures</b>		
Industry – National/Qld	The reference to allergens as contaminants in food is not in line with industry best practice. Some foods that people have an allergic reaction to are actually ingredients in processed food products.	Adopted. References to allergens as ‘contaminants’ removed and replaced with ‘cross-contact allergens’, in line with approach from Allergen Bureau. Information also added to CVIG to highlight the issues to users.
RTO – WA	<i>RE: KE</i> First Aid should not be a measurement of Food safety. First Aid should only be practised by those specifically trained to do so, and they should be trained to work in their specific environment	Adopted - reference to first aid removed.
	<i>RE: KE</i> <i>Clarification of what is meant by appropriate and the context at which level of first aid knowledge required</i>	
Industry Association – National/Qld	<i>RE: KE</i> How does this apply to food safety? What level of first aid needs to be applied to be deemed appropriate. i.e. minor bleeds or loss of limb. Is this it applying or dealing with the result of first	

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	aid having to be applied i.e. type of bandage or PPE requirement	
RTO/Industry Association – National/Qld	<p><i>RE: KE</i> Who decides what the GMP for the work roles are? What are the decisions based on? And how do we assess that? If they are the best practises, they should be part of the Standard Operating Procedures</p>	GMP activity occurs in the context of the workplace/job role (and could be included in SOPs).
	<p><i>RE: KE</i> Can this epistle be broken down somewhat? There is so much in this, how can you assess all of that? Over 10 elements in that statement</p>	Adopted - dot point reviewed, and points separated.
<b>FBPFSY2XX1 Maintain food safety when loading, unloading and transporting food</b>		
No feedback requiring action.		
<b>FBPFSY3001X Monitor the implementation of food safety and quality programs</b>		
Industry – National/Qld	The reference to allergens as contaminants in food is not in line with industry best practice. Some foods that people have an allergic reaction to are actually ingredients in processed food products.	Adopted. References to allergens as ‘contaminants’ removed, in line with approach from Allergen Bureau. Information also added to CVIG to highlight the issues to users.
<b>FBPFSY3XX1 Control contaminants and allergens in food processing</b>		
Industry – National/Qld	The reference to allergens as contaminants in food is not in line with industry best practice. Some foods that people have an allergic reaction to are actually ingredients in processed food products.	Adopted. References to allergens as ‘contaminants’ removed and replaced with ‘cross-contact allergens’, in line with approach from Allergen Bureau. Information also added to CVIG to highlight the issues to users.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
<b>FBPFSY3XX2 Participate in traceability activities</b>		
RTO – NSW/Vic	<i>RE: PE</i> Operator would only work one or two areas.	Adopted - 'including at least two of the following' added to lead-in sentence
	<i>RE: Placement</i> I believe the FBPFSY3XX2 should not be a CORE Cert 3 unit.	Noted. Several industry representative and subject matter experts have considered this feedback and disagree, as there has been a clear message that the unit should be core in the Certificate III,  The intent of this unit is for operators to understand their role in the chain of traceability of a product. Issues around traceability are a major driver for this project and many employers want traceability explicitly addressed.
	<i>RE: Placement</i> Should not be a CORE Cert 3 unit	
	<i>RE: Placement</i> Not a core unit - too many specialist operation - good elective unit	
	<i>RE: PC 1.3</i> Mass Balance is more A Cert IV or Diploma very few if any will be able to do a Mass Balance.	
	<i>RE: PC 1.4</i> We estimate that about 5% of businesses perform this task and even less people would actually understand this. It is a very specialised field which should be an elective at a far higher level, maybe Cert 4 or Diploma.	Noted. Reference to identifying the system used to document mass balance removed from PC 1.3 but remains in KE. Note that the unit does not require the candidate to perform mass balance calculations, but to have knowledge of the concept. The inclusion has been made in response to feedback from industry experts who have provided their expertise on this matter throughout this project.
Industry – National/Qld	The reference to allergens as contaminants in food is not in line with industry best practice. Some foods that people have an allergic reaction to are actually ingredients in processed food products.	Adopted. References to allergens as 'contaminants' removed and replaced with 'cross-contact allergens', in line with approach from Allergen Bureau. Information also added to CVIG to highlight the issues to users.
<b>FBPFSY5XX1 Develop an allergen management program</b>		

<b>Stakeholder Comments and Identified Issues</b>		<b>Consideration and Proposed Resolution</b>
Industry – National/Qld	The reference to allergens as contaminants in food is not in line with industry best practice. Some foods that people have an allergic reaction to are actually ingredients in processed food products.	Adopted. References to allergens as ‘contaminants’ removed and replaced with ‘cross-contact allergens’, in line with approach from Allergen Bureau. Information also added to CVIG to highlight the issues to users.
<b>FBPFSY5XX2 Design a traceability system for food products</b>		
No feedback requiring action.		
<b>FBPOPR2XX2 Carry out manual handling tasks</b>		
No feedback requiring action.		
<b>FBPOPR3003X Identify dietary, cultural and religious considerations for food production</b>		
Industry – National/Qld	The reference to allergens as contaminants in food is not in line with industry best practice. Some foods that people have an allergic reaction to are actually ingredients in processed food products.	Adopted. References to allergens as ‘contaminants’ removed and replaced with ‘cross-contact allergens’, in line with approach from Allergen Bureau. Information also added to CVIG to highlight the issues to users.
<b>FBPOPR3X17 Pre-process raw materials</b>		
No feedback requiring action.		
<b>FBPRBK1001 Finish products (Release 2)</b>		
No feedback requiring action.		

## Proposed Merge of Cleaning units

For this second draft consultation phase, stakeholders were asked if it would be suitable to merge two similar cleaning units: *FBPOPR2064 Clean and sanitise equipment* and *FBPOPR2063 Clean equipment in place*.

Ultimately, at some sites, the job tasks defined by the units are quite separate and often conducted by different workers, so on this basis the units will not be merged (so *FBPOPR2063 Clean equipment in place* and *FBPOPR2064 Clean and sanitise equipment* will be included in the training package as separate units).

**The feedback in this section sought to ask additional questions or provide historical context. Further below are specific responses to the proposed merger.**

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
<b>FBPOPR2XX3 Clean and sanitise food processing equipment</b>		
Government department – SA	Is there any cross-over with this and the new infection control units?	Not really - the <a href="#">infection control skill set</a> is focused more on controlling people to people infection whereas these units focus more on cleaning of equipment and work areas. Note that the new GMP units cover content on personal hygiene and handwashing, but again, in a slightly different context to the new infection control units. Note that advice from Subject Matter Experts warned against adding extra content about infection control to units, as there isn't consensus within the industry about things like wearing masks etc. PPE should address this with whatever is required for the workplace, ensuring the units are suitable for different workplace requirements.
Industry – NSW	The discussion on whether FBPOPR2063 Clean equipment in place and FBPOPR2064 Clean and sanitise equipment should be merged was also quite strong during [previous reviews]. The end result was that while there was recognition that the two units could be delivered in a duplicated way this depended on the particular enterprise's equipment and processes allowing for duplicated delivery. Industry advice in the [previous] review was that there were many enterprises where the	Good to understand the background - thank you for the comments.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<p>two skills were quite different especially plants involved in continuous or large scale batch processing where special skills and knowledge of production equipment and processes were needed for in place cleaning procedures for things like changeovers to a new product where traces of the previous product must be flushed out before production of the new product occurs. In large enterprises the advice was that often FBPOPR2063 was a skill requirement for operators (see PCs 1.6 and 2.1) and FBPOPR2064 was a requirement for specialist cleaners. In SMEs often the one person would need both units but they could still be two processes.</p>	

**Additional feedback in response to this proposal to merge.**

A reminder that, at some sites, the job tasks defined by the units are quite separate and often conducted by different workers, so on this basis the units will not be merged (so *FBPOPR2063 Clean equipment in place* and *FBPOPR2064 Clean and sanitise equipment* will be included in the training package as separate units).

Stakeholder Comments	
<b>FBPOPR2XX3 Clean and sanitise food processing equipment</b>	
RTO – WA	<p>Just had a look at this proposed merge. This is not possible as these are two different processes of cleaning. Unless someone does both processes you would never be able to sign anyone off. CIP is generally only done in beverage and even though in beverage the business does both it is rarely the same person.</p> <p>This merger would mean no employee in non-beverage food manufacturing could do a cleaning unit.</p>
RTO – NSW/Vic	<p>Different job roles if you are an operator of equipment without a CIP system you clean and sanitise if you are an operator of equipment which requires CIP cleaning skills required are different</p> <p><i>and</i></p>

Stakeholder Comments	
	Note units Clean and sanitise and CIP should be separate units.
Industry – Vic	As someone who does both tasks I would say two units
RTO – NSW/Vic	Agree with both comments above <i>and</i> Must remain as two separate units. Clean and Sanitise is different to Clean Equipment in Place.
RTO – SA	I have had a look at the unit and I think it merges really well
Government Department – WA	Support the proposed merger of the two clean and sanitise units into the new unit FBPOPR2XX3 Clean and sanitise food processing equipment.
RTO – Vic	Should we merge OPR2063 and 2064? We have concerns with this and we believe that there is scope for both methods to be available. Not all food businesses use CIP systems and do a lot of manual cleaning of equipment. Everybody manually cleans but not everyone CIP cleans.
Industry Association – National	These should be merged, no additional comments
Industry – NSW	At [our organisation] (large manufacturing site), the two units cover quite different job tasks and are usually carried out by different workers.

Additional feedback on the separated Cleaning units

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
<b>FBPOPR2064 Clean and sanitise equipment</b>		
Industry – National/ Qld	Unit discusses that it covers wet and dry cleaning but this is not called out in the Knowledge evidence section and they are vastly different processes	Adopted - dot point added to Knowledge Evidence.
	Would suggest that there needs to be slightly more detail in the way of confirming the effectiveness of cleaning, rather than just visual inspection. People really should be taught that all parameters related to cleaning can and should be recorded and that additional verification i.e. use of ATP, protein swabbing can also be used	Adopted. PC and KE dot point added to cover cleaning verification checks and methods.
	Cleaning and sanitising are really different things, there could be the opportunity to convey that cleaning is about removing soiling and sanitising is about microbiological control	Adopted - dot point added to Knowledge Evidence.
	The following should be added: Difference between wet and dry cleaning and how they are done Differences between COP and CIP Difference between cleaning and sanitising and why they are done and when I see allergen cleaning is discussed in both – I'd love to know what we mean by this? Cleaning verification – checks that this is effective You could also add in cleaning schedules / cleaning matrixes See my points for the individual units above	Adopted.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
<b>FBPOPR2063 Clean equipment in place</b>		
Industry – National/ Qld	[This unit is] definitely more focused on CIP	Noted.
	A lot of the info in the knowledge evidence is great and probably should also be in FBPOPR2064 for alignment, doesn't matter if it's automated or not, people should still understand the same key concepts	Adopted.
	The following should be added: Difference between wet and dry cleaning and how they are done Differences between COP and CIP Difference between cleaning and sanitising and why they are done and when I see allergen cleaning is discussed in both – I'd love to know what we mean by this? Cleaning verification – checks that this is effective You could also add in cleaning schedules / cleaning matrixes See my points for the individual units above	Adopted.

## Units no longer proposed for removal

This section includes units that were proposed for deletion in Draft 1 but have been reinstated and revised based on stakeholder feedback, and a draft created for this second draft consultation phase.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
<b>FBPDPR3XX5 Operate and monitor a butter churning process</b>	
No feedback requiring action.	
<b>FBPDPR3XX6 Operate and monitor a butter oil process</b>	
No feedback requiring action.	
<b>FBPFAV2001X Apply hydro-cooling processes to fresh produce</b>	
No feedback requiring action.	
<b>FBPFAV3001X Conduct chemical wash for fresh produce</b>	
No feedback requiring action.	
<b>FBPFAV3002X Program fresh produce grading equipment</b>	
No feedback requiring action.	
<b>FBPGPS3XX1 Operate and monitor a creamed honey manufacture process</b>	
No feedback requiring action.	

## Units of competency proposed for removal

Note: *FBPOPR2031 Operate a coating application process* was accidentally omitted from the website during the second public consultation phase. However, this unit has had low/no enrolments and no feedback requesting its retainment was received during the first consultation stage, so this unit remains proposed for removal.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
<b>FBPBEV2001 Operate a deaeration, mixing and carbonation process</b>		
Government department – WA	Support the deletion of the following units due to no enrolments recorded in WA since 2015	Thank you – unit to be removed.
<b>FBPBEV2002 Manufacture roast and ground coffee</b>		
RTO – SA	<p>I am writing in regards to the proposed deletion of the FBPBEV2002 Manufacture Roast and Ground Coffee Unit. From the information provided on the skills impact website we understand that this unit has been marked for deletion due to low enrolment numbers.</p> <p>[Our organisation] saw great opportunity in the unit to provide the many micro businesses in South Australia with formally recognised Training and Assessment in an area relating to their business.</p> <p>Our team undertook a large amount of research and training in addition to their existing experience to develop the learning and assessment tools for the unit as well as purchased a range of equipment to support the delivery and assessment of this unit. We have been delivering it for the past 12 months to industry and as special interest programs alongside our café and barista programs; currently have 104 participants have achieved competency.</p>	<p>Thank you for the feedback and informing us of enrolments to this unit that are not yet captured by NCVER data. This unit will no longer be deleted. Unit has been updated to bring in line with updates to other units in this project.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<p>This unit is still in its infancy, there are very few training options accredited or not for this skill and as such we believe there is more market for this unit and one that is growing in interest, not only for the RTO but also in our [Commercial Café].</p> <p>Is there anything we can do or further information we can provide to support this unit to remain available in the FBP training package?</p>	
Government department – WA	Support the deletion of the following units due to no enrolments recorded in WA since 2015	Thank you – based on the feedback received above, this unit will be retained.
<b>FBPBEV2003 Operate an ice manufacturing process</b>		
Government department – WA	Support the deletion of the following units due to no enrolments recorded in WA since 2015	Thank you – unit to be removed.
<b>FBPCON2001 Examine raw ingredients used in confectionery</b>		
Government department – WA	Support the deletion of the following units due to no enrolments recorded in WA since 2015	Thank you. Note that this unit will not be removed and will instead be superseded to new unit <i>FBP3X14 Receive and store raw materials</i> due to incorporation of some content from the confectionery unit.
<b>FBPGPS2005 Operate a fractionation process</b>		
Government department – WA	Support the deletion of the following units due to no enrolments recorded in WA since 2015	Thank you - Unit to be removed. No enrolments in a very long time.
<b>FBPGPS2010 Operate a winterisation process</b>		

<b>Stakeholder Comments and Identified Issues</b>		<b>Consideration and Proposed Resolution</b>
Government department – WA	Support the deletion of the following units due to no enrolments recorded in WA since 2015	Thank you - Unit to be removed. No enrolments in a very long time.
<b>FBPOPR2019 Fill and close product in cans</b>		
Industry/Union – Vic	This unit is needed please	Thank you - Unit reinstated based on feedback (and included in Certificate II in Food Processing).
Government department – WA	Support the deletion of the following units due to no enrolments recorded in WA since 2015	Thank you - based on the feedback received above, this unit will be retained.
<b>FBPOPR2047 Operate a portion saw</b>		
Government department – WA	Support the deletion of the following units due to no enrolments recorded in WA since 2015	Thank you – unit to be removed.
<b>FBPOPR2049 Operate a reduction process</b>		
Government department – WA	Support the deletion of the following units due to no enrolments recorded in WA since 2015	Thank you – unit to be removed.
<b>FBPOPR2051 Operate a spreads production process</b>		
Government department – WA	Support the deletion of the following units due to no enrolments recorded in WA since 2015	Thank you – unit to be removed.

## General feedback/comments

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – WA	Also the GMP unit is an issue as the GMP terminology is incorrectly used by auditors in Australia the correct terminology by international standards is Pre-Requisite Programs (PRPs) and GMPs are the manufacturing procedures.	Noted. Terminology remains 'GMP' in response to feedback from industry/industry associations. See below for response from Subject Matter Expert for additional feedback on this comment.
Industry – National	<i>RE: GMP vs prerequisite programs terminology</i> Both terms are used, but GMP is better understood. Pre-requisite programs can refer to other things as well. GMP speaks to what it is, whereas other things could fit under “prerequisite programs”. Suggestion of potentially referring to “prerequisite programs” in the Application (as well as GMP) – be a bit careful doing that. “Prerequisite programs” can be different things in different businesses, so you might run into inconsistency in what fits under that. Introducing the language is appropriate because it’s a term that’s used, but I think you’ve got to be careful about being too prescriptive in the definition.	Adopted. Terminology remains GMP.
RTO – Vic	I agree with above comment	Noted and adopted. Terminology remains GMP.
Industry – NSW	I would be very wary of adopting the suggestion on P26 of the Feedback and Summary Report 2nd last row which suggests that "MSS403040 Facilitate and improve implementation of 5S" be replaced with “AHCWRK310 - Provide on-job training support”. ...I can say with certainty that the two units are very different in intent and the RTO that is providing this feedback is either misunderstanding	Adopted. Thank you for the background information. <i>MSS403040 Facilitate and improve implementation of 5S</i> and <i>AHCWRK310 Provide on-job training support</i> will both be included as electives.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<p>the MSS unit or alternatively take a broad interpretation of the AHC unit to cover lean skills. As the RTO commented, the AHC may be better for small workplaces but this is because these companies generally do not implement formal lean processes. Making the suggested change of replacing the MSS unit with the AHC unit though risks exposing Skills Impact to a charge of not understanding processes used for efficiency improvement that are used by larger employers who do implement formal lean processes. The MSS unit is about the facilitation and improvement of a implementation of a process i.e. the lean manufacturing related process of 5S which is the lean 'housekeeping methodology' derived from the Toyota production process i.e. "Sort", "Set In order", "Shine", "Standardize" and "Sustain". The AHC unit is about providing on the job training support and does not mandate any link to quality, efficiency and understanding of manufacturing processes. A better solution would be to offer both units as electives and not have a substitution.</p>	
Gov – WA	<p><i>RE: CVIG</i> all seems good to me.</p>	Noted - thank you.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
Industry association – Qld	<p>Where units say PE has been clarified – can you confirm no inclusion of mandatory performance hours has been added?</p> <p><i>Follow-up response:</i> Regarding performance evidence clarification. Thank you for confirming that there will be no mandatory time requirement for performance evidence other than the two-hour minimum for freezer rooms (which is totally justifiable). I believe these proposed changes will benefit the industry.</p>	<p>The only unit that has reference to a time frame is working in frozen storage. Otherwise most units refer to a “batch” of something being processed. See below.</p> <p>Noted - thank you for the follow-up response.</p>
Industry association – National	<p><i>RE: Use of "cross contamination" language</i> Have a different perspective - strongly disagree</p>	<p>Adopted. The term 'cross contact' incorporated in reference to allergens (not contaminant or cross-contaminant).</p>
Industry association – National	<p>Want food safety to encompass food allergen management, and when you talk about microbial contamination or any contamination, it's cross contamination, and it is still cross contamination with allergens as well, so we felt if we're going to change the culture for food safety to include allergen management, we should be using the same terminology.</p>	<p>Noted. Other Allergens Subject Matter Experts make the point that in food processing, sometimes the allergen or the cross contact allergen is an actual ingredient in the processed food (and not everyone will have an allergic reaction to the ingredient), so to refer to those items as contaminants can be unclear. Agree that culture needs to change around allergens and food safety - need to ensure the language is right so that the approach is sensible for everyone. Context about the language of allergens added to CVIG.</p> <p><i>(Note: The respondents were contacted separately after their feedback was received to discuss and resolve the terminology issues they had raised and the resolution responses provided above reflect the outcomes of these discussions.)</i></p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
RTO – Vic	I've been training and a part of the food industry for 18 years and I've never seen nor heard the term cross contact, potentially it occurs in other states but not in Vic or NSW to my knowledge	Noted. There is a very clear message from the Allergens Subject Matter Expert Working Group that the term 'cross contact' should be used.
Gov – WA	Support the strengthened Allergen content in the units.	Noted - thank you.
Industry Association – National	<i>RE: Revised Units</i> [Industry Association] is comfortable with the changes made to the units listed However, it must be noted that changes made in relation to allergens in those units utilised by feed manufacturers are not relevant and should not be made compulsory. The allergen changes do not make any sense at all for stock feed manufacturing. This is a reason why there should be a stock feed specialty like flour milling. The units have not been reviewed in an holistic nature and political angst/pressure from a number of organisations has resulted in non-specific material included for a sector that does not require it.	Noted, and where suitable, adopted.  The 'Control contaminants and allergens in food processing' unit has been removed from the core of the Certificate III to address the concern that it may not be suitable for all users of the qualification.  References to allergens in core units (for all qualifications) are included as dot points in the Knowledge Evidence to ensure all learners are aware of allergens and how they can be controlled, noting that where the unit has been contextualised for a workplace such as stockfeed manufacturing, the training doesn't need to go much further than that.  In addition, content has been added to the CVIG to reiterate the inclusion of allergens in units of competency and how the training of these points can vary depending on the sector and the work role.
Industry Association – National	<i>RE: units proposed for deletion</i> Happy to have the list deleted if the majority agree.	Noted - thank you.
Industry Association – National	<i>RE: Implementing this training</i> Supportive of the general changes made	Noted - thank you.
Industry Association – National	<i>RE: units moved to other projects</i> Need to confirm that some of the units that have been removed from the FBP also relate to the feed	Noted – We will keep this in mind during the Flour Milling project and will get back to you later about where these will go, which will depend on the outcomes of that project.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<p>manufacturing sector and should not be removed. These include units ending in 2002, 2005, 2007, 2008 and 3004. There needs to be some way of enabling feed manufacturers to maintain access to these units. A possibility is that flour milling and feed manufacturing are segregated together. It is envisaged that this will improve uptake of the courses as a result of segregation.</p>	
RTO – Vic	<p>Qualifications – it appears that the proposed reduced suite of qualifications will continue to provide the desired training across all sectors. I have a concern that it may be possible to achieve the Certificate II with a combination of units that do not actually provide the skills necessary to work effectively in food processing. I request that the packaging rules are reviewed to ensure that all 'allowed' unit combinations will achieve a true vocational outcome.</p>	<p>Noted and rules reviewed. The rules strike the balance between allowing enough flexibility to suit a wide range of audiences and not so flexible that the food processing context is lost. The option to choose 3 units from other training packages and accredited courses allows for flexibility of choice and for units such as SFI and AMP (seafood and meat units) to be included.</p>
	<p>Thank you for detailed documentation of the feedback on the Draft 1.0 materials. This is very useful to confirm that many stakeholders are engaged in the revision process and that ultimately the revised training products will be readily implemented by training organisations and therefore meet the industry's needs for appropriately skilled staff.</p>	<p>Noted - thank you.</p>
	<p>I have sampled a range of units and still have some concerns over the very lengthy lists of required Knowledge Evidence in many units. The response made in your summary document to my initial feedback; "each knowledge evidence dot point does not require a separate assessment 'event' is</p>	<p>Noted. There has been no feedback from Industry representatives or from RTOs indicating any of the KE is unnecessary and some industry representatives have requested additions. Note that several Knowledge Evidence points can be merged into one assessment task, and duplicated points only need to be addressed once.</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	indeed correct. However every dot point must be assessed in a valid manner which may pose considerable demands on training organisations and make delivery of the units not viable in the highly competitive, commercial landscape in which those organisations operate,	
	<p>I note that the Performance Evidence (PE) field of all units has been reviewed to ensure compliance with the Standards. However I did identify remaining instances where the content of this field does not describe assessable evidence e.g. FBPBPG3XX3 Operate and monitor a form, fill and seal process. The PE field of this unit includes the dot point “following safe work procedures”. This would not appear to meet the Standards in that it does not; specify the required product and process evidence or specify the frequency and/or volume of product/process evidence.</p> <p>Of course ‘following safe work procedures’ is essential but this phrase does not specify something that can be assessed and for which the attempted assessment will be defensible by the RTO at audit.</p>	<p>Noted. All units specify volume and/or frequency requirements, usually in a lead in statement that says something like: 'has operated a form, fill and seal process to process at least one batch of goods to specification'. Following safe work procedures is a task that can be observed and assessed as part of the overall tasks to 'produce at least one batch of goods to specification'.</p>
RTO – NSW	Support the creation of the GMP units, and the inclusion of them in the core of the qualifications.	Noted - thank you.
RTO – NSW	<p>Would be good to have a skill set to support people who have been displaced due to COVID-19 layoffs.</p> <p>Support the above comment about skill sets to help workers transition into food processing (which is still doing well considering COVID-19). Something</p>	<p>Adopted. Two new skill sets developed. (See FBPSXXXX05 Supervised Food Processing Operator Skill Set and FBPSXXXX06 Food Processing Operator Skill Set.)</p>

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<p>at a level 3 or 4 could be useful for people who have skills in other areas but want to transition into a slightly different sector. Level 2 could also work for people moving into food processing for the first time from other areas.</p>	

## Additional feedback on draft 1 documents

These documents, whilst not highlighted for feedback in this section consultation phase, received additional feedback during this time.

Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
<b>FBPEGG2001X Work on an egg grading floor</b>		
Government department – WA	FBPEGG2001X Work on an egg grading floor and FBPEGG2002X Operate egg grading and packing floor equipment seem to be unable to stand alone - in which case they should be amalgamated.	Noted. FBPEGG2001X is focussed on quality and egg grading, whereas FBPEGG2002X is focussed on operating equipment. Subject Matter Experts have confirmed the job tasks can be covered by different workers, so the units need to remain separated.
<b>FBPFSY4XX1 Perform an allergen risk review</b>		
Industry Association – National/Qld	The reference to allergens as contaminants in food is not in line with industry best practice. Some foods that people have an allergic reaction to are actually ingredients in processed food products.	Adopted. References to allergens as ‘contaminants’ removed and replaced with ‘cross-contact allergens’, in line with approach from Allergen Bureau. Information also added to CVIG to highlight the issues to users.
<b>FBPFSY4XX2 Provide accurate food allergen information to consumers</b>		
Industry Association – National/Qld	The reference to allergens as contaminants in food is not in line with industry best practice. Some foods that people have an allergic reaction to are actually ingredients in processed food products.	Adopted. References to allergens as ‘contaminants’ removed and replaced with ‘cross-contact allergens’, in line with approach from Allergen Bureau. Information also added to CVIG to highlight the issues to users.
	PCs: suggest the addition of another point to align with the criteria 3.4 identify labelling requirement differences between packaged and non-packaged bulk products	Adopted - PC 3.4 added as suggested.
	KE: the reference to National Allergy Strategy is not appropriate	Adopted - reference removed.

Stakeholder Comments and Identified Issues	Consideration and Proposed Resolution
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**FBPFSY4XX4 Conduct a traceability exercise**

<p>RTO – Qld</p>	<p>First there needs to be a definition of what “traceability exercise” means. There are 3 different activities that can be described as a “traceability exercise”- They are similar but all different in the tasks performed:</p> <ul style="list-style-type: none"> <li>-mock recall: has a trace check as one of a number of activities required i.e. a full practice recall.</li> <li>-mass balance: probably the most important part of a trace check (i.e. count them in &amp; count them out &amp; balance the figures), that many people do not do and actually do not know how to do. Unless you do this task you don’t even know if you have traced all products. This task is not covered at all by this competency- it needs to be included.</li> <li>-trace check: covering the identification of all incoming raw material and packaging (dates, suppliers and quantity), trace everything through all process steps inc production, storage, waste, rework ect and out the door at despatch. Nothing in this competency mentions receival and dispatch records let alone rework, waste....samples taken by marketing.... Calibration records have no relevance to product traceability.</li> </ul>	<p>Adopted. Reference to mass balance added to unit in later draft.</p> <p>Reference to receival and dispatch also added.</p> <p>Reference to calibration in PC removed.</p>
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**FBPFSY5XX1 Perform an allergen risk review**

<p>Industry Association – National/Qld</p>	<p>PCs – swap 2.4 and 2.5</p> <p>KE:</p> <p>Suggest adding - new product development, approved supplier program / vendor assurance, engineering and maintenance.</p> <p>Also suggest adding in:</p> <ul style="list-style-type: none"> <li>-how an allergen management program sits within</li> </ul>	<p>Adopted. Unit updated.</p>
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Stakeholder Comments and Identified Issues		Consideration and Proposed Resolution
	<p>the context of a Voluntary Incidental Trace Allergen Labelling (VITAL) Program</p> <ul style="list-style-type: none"> <li>-units used for reporting results of laboratory tests, including differences between quantitative and qualitative (need something about data, given that it's mentioned in 2.0 and 3.0)</li> <li>-suitable tests for identifying allergens?</li> <li>-typical sampling methods</li> <li>-ongoing sampling plan</li> </ul>	
<b>FBPFSY5XX3 Plan to mitigate food fraud</b>		
RTO – Qld	<p>Whoever wrote this document has just copied a HACCP procedure and substituted the word “food fraud”, possibly even started with FBPFSY3002. A food fraud risk assessment requires a completely different approach. First up TACCP (Threat assessment) is also completely different from VACCP (food fraud assessment) and HACCP (food safety assessment). Each requires different variables within the risk assessment methodology and incredibly different control measures. So need a clear definition of what is included and what is not before anything else.</p> <p>HACCP = likelihood x severity.</p> <p>VACCP = likelihood x Detectability x profitability.</p> <p>TACCP = likelihood x Detectability x motivation.</p> <p>Food safety: HACCP hazards: prevention of unintentional/accidental adulteration</p> <ul style="list-style-type: none"> <li>• Science based.</li> <li>• food borne illness.</li> </ul>	Comments noted and suggestions adopted. Changes made to unit.

**Stakeholder Comments and Identified Issues**

**Consideration and Proposed Resolution**

Food Fraud: VACCP: vulnerabilities

- Prevention of intentional adulteration.
- Economically motivated.

Food Defence: TACCP: threats

- Prevention of intentional adulteration.
- Ideologically motivated i.e. bioterrorism

The identification of food fraud is not required by any regulations- in Aust- but is an increasing market requirement. As an example here are BRC (worldwide retailer std) requirements for suppliers:

3.5.1.1 Documented risk assessment of each raw material that must consider substitution or fraud .

5.4.2 Documented assessment of the vulnerability of the raw material supply chain.

5.4.3 Where raw material are identified at risk then control measures/mitigation measures be put in place.

9.1.1 Documented risk assessment of each raw material that must consider adulteration or fraud.

So these are the key tasks that must be covered in any competency. The emphasis must be on raw material, not finished products. Food fraud is not undertaken by pissed off workers. Food fraud starts at the top and is co-ordinated by the top management within a business. The focus is on the raw material supply chain not within the finished product production process steps, like HACCP is. It is not about changing the process steps within your own production process but understanding your raw material supply chain/country of origin/price changes/history of fraud occurrences within that

**Stakeholder Comments and Identified Issues**

**Consideration and Proposed Resolution**

raw material an that supply chain. The steps required to undertake this task are:

List all raw materials.

- Collect information on every single raw material: List all raw materials, their country of origin, their suppliers (importers/agent/brokers), source manufacturers, pricing trends & all known testing & sampling activities.
- Particularly make sure you have all current certification information on all brokers/agents you buy off & in turn all source manufacturers that actually make the raw materials.
- To get the information on certification read cartons & look for GFSI stds logos, go to companies websites to see what stds they may have implemented. Cross check that information back to the GFSI stds databases or ask the certification body listed.

Risk evaluation: ranking of suppliers and raw materials. The more accurate information is used within the assessment the more accurate answer/ranking will be available to the user.

- This could be as simple as run every raw materials through HorizonScan and see which of your ingredients come out worst in that ranking. This list is likely to be your Top 10 priority for control.
- Some raw materials can be grouped if they are derived from the same plant/animal in the same country of origin (i.e. cinnamon

**Stakeholder Comments and Identified Issues**

**Consideration and Proposed Resolution**

from Sri Lanka) or if they are processed by the same source manufacturer (i.e. same factory) & they have provided you with all test methods & all current certifications- which also include VACCP assessments as mandatory auditable requirements i.e. BRC Food, SQF vs 8, FSSC 22 000 vs 4.1, but not 3rd party HACCP or any ISO stds.

- Evidence of past issue & incidents of fraud for that product must be assessed for each raw material. There are many sources that can be used & it is suggest that worldwide sources be used particularly for recall notices. Price changes & availability of the raw material must also be collected as this will have a large bearing on future fraud likelihood.
- After all raw materials have been ranked between 1 – 125, the VACCP team members will have to make a decision on at what score will additional control measures be allocated. This number will indicate the level of significance.
- Implement additional mitigation strategies & detection methods as required based on your documented risk assessments of both supplier's supply chains & raw materials.
- Document procedures & keep records for each assessment and references.
- Horizon scanning for emerging issues (trigger points for action) & review regularly.
- Keep records of the review.

<b>Stakeholder Comments and Identified Issues</b>		<b>Consideration and Proposed Resolution</b>
RTO – Qld	Also forgot to mention for the FBPF5Y5XX3 Plan to mitigate food fraud- assessment conditions- does not need to be undertaken in a food processing workplace at all. I can sit here on my couch and undertake a food fraud assessment on 80 raw materials without moving, if I have the correct information. What you really need to do this task effectively is access to the internet and a paid subscription database like Horizon Scan.	Noted. The point of the condition is that candidates have access to real workplace-like information and systems.