Dear Food Safety Unit

Healthy Food Options for Class 4 Food Premises

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia, working to promote the health and well-being of all Australians. It is the pre-eminent voice for the public’s health in Australia and seeks to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.

PHAA welcomes the opportunity to provide a submission about the proposed making or variation of a declaration of classes of food premises. Specifically, PHAA endorses the submission and recommendations of Healthy Greater Bendigo and the City of Greater Bendigo to include unprocessed vegetables, when cooked and served immediately as a Class 4 food handling activity. We share the view that the classification changes currently being proposed, and planned development and release of accompanying guiding materials provide an ideal opportunity to promote healthier options at community fundraisers, while maintaining food safety.

The prevention of food borne disease and increasing healthy eating are two important Victorian Government priorities. The latter is one of four priority areas under the Victorian Public Health and Wellbeing Plan 2019-23.

As you are aware the current declaration classifies cooking and serving sausages, with or without onions, as class 4 - the lowest level of regulation. Cooked vegetables are not currently able to be sold under Class 4. We are aware that data provided to the City of Greater Bendigo by the Department of Health and Human Services demonstrates that no food poisoning outbreaks were known to be caused by cooked vegetables from 2013- 2018 (Department of Health and Human Services data request 201925, 2019). Encouraging cooked vegetables to be served at community events demonstrates the Government’s commitment to increasing healthy eating. Providing greater options for those who have a plant-based diet (or wish to limit their meat consumption) also supports the focus area of tackling climate change and health in the Victorian Public Health and Wellbeing Plan 2019-23.

This review also provides an opportunity to ensure that the guidance material provided to community groups promotes the offering of healthy food choices. We understand that the information provided when community groups register their event on Stretrader notes that in addition to cooked sausages, Class 4 ‘also covers things like canned soft drinks and wrapped chocolates.’ While whole (uncut) fruit and vegetables may be sold under Class 4, this is not highlighted in information to community groups.
The Department of Health and Human Services have developed the Healthy Choices Guidelines (2016), which aim to improve the availability and promotion of healthy foods and drinks in the community. This framework is based on a traffic light system to classify foods and drinks according to their nutritional value; with red foods and drinks being the unhealthiest and green foods and drinks being the healthiest.

The guidance material provided should encourage community groups to offer food and drink options from the green (best choice) category. This includes water, vegetables, reduced-salt sauces and whole grain bread. Sausages, sugary soft drinks and wrapped chocolates are in the red category of foods and drinks and should be limited.

Given that Victorian Public Health and Wellbeing Plan 2019-23 includes a strategic action to accelerate the implementation of healthy food and drink supply policies in all key public settings, PHAA believes that the changes recommended by the Healthy Greater Bendigo and the City of Greater Bendigo should be made as part of the current reform process.

These changes will enable people across Victoria to choose healthier food and drink options while supporting their local community groups.

Yours sincerely

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