

# Regulatory Delivery Framework Report

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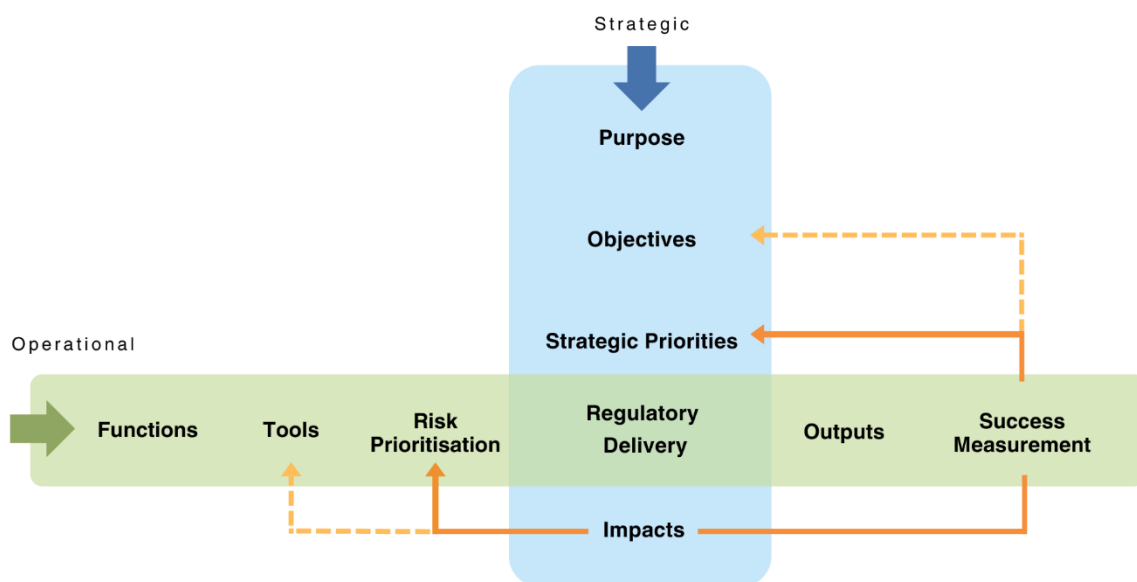
## Background

In 2022, Safe Food commissioned the Public Risk management Institute (PRISM Institute) to review Safe Food’s current regulatory approach. The PRISM Institute’s recommendations, as noted in their report ‘Future Visioning Safe Food Production Queensland’s Regulatory Delivery Model’ (PRISM’s report), will inform the foundations of the new Regulatory Delivery Framework (RDF).

Safe Food’s new RDF is designed to support the agency’s future operating model and strategic priorities, both of which require an outcome based collaborative approach to regulatory delivery.

## Overview

The RDF provides both the structure and adaptability required for the agency to deliver, measure, and report on its regulatory activities into the future as businesses and industry sectors innovate in response to changing industry demands and environmental conditions.



The RDF does not seek change any existing legislative arrangements. Instead, it focuses on how Safe Food can improve our delivery of regulation to better suit industry needs and take a more proactive approach to regulatory delivery.

The RDF was designed with reference to the [Regulatory Delivery Model](#), a conceptual structure that steers effective regulatory delivery and best practices for regulators. While this model provided the structure for the framework, the overarching approach principles to be applied through the framework reflect those necessary to establish a regulatory environment through Outcome Based Collaborative Regulation (OBCR).

OBCR aims to incentivise people and organisations to collaborate to achieve agreed common goals. It aims to combine multiple goals of business, governments, regulators and societies with acceptable risk. OBCR does this by enabling organisations to leverage earned and demonstrated trust as a basis for all activities.



## Purpose

Safe Food's purpose, as fixed by the *Food Production (Safety) Act 2000* (FPS Act), remains to monitor the production and processing of primary produce to ensure produce is fit for consumption and maintains its quality.

Safe Food's secondary purpose, as articulated in its Strategic Plan, is to provide confidence to Queenslanders that food produced in Queensland is safe.

Safe Food's purpose and vision will not shift under this RDF.

We will, however, identify the unique scope of each food safety scheme to the extent that it applies to food manufacturing, wholesaling, and retailing settings, which are predominantly licenced under the Food Act 2006. For the framework to be effective, Safe Food will need to proactively communicate its regulatory role, responsibilities, and accountabilities.

The commitment to follow the Queensland Government Regulator Model Practices will help in this regard, as will the progression of the modernisation of the regulator commitments under the Australia New Zealand Food Regulatory System.

The purpose of this RDF is to support Safe Food in making good decisions, allocating resources, and monitoring food sector industries in the most effective way possible.

## Scope

This report aims to clearly articulate the scope of Safe Food's remit as outlined by the ANZ Food Regulation System, noting how our functions will be applied within the Queensland system. This will help minimise duplication across regulating bodies.

Safe Food will take a risk-based approach to regulatory delivery. Using a range of intervention methods, Safe Food will incentivise compliance and self-assessment for accreditation holders thus minimising direct intervention for compliant businesses and focusing intervention instead on areas of non-compliance.

This will ultimately lessen the regulatory impost for both regulator and industry, which in turn will allow Safe Food to allocate resources more effectively to broader industry contributions.

This RDF will also allow us to better understand how our systems are performing and to seek continuous improvement in all areas.



## Regulatory Objectives

Safe Food’s overarching regulatory objectives are two-fold:

**1. To verify that practices adopted by the regulated sectors meet food safety requirements (compliance focus).**

This objective relates to Safe Food’s compliance activities, including implementing food safety schemes, granting accreditations, monitoring businesses and approving audits – all of which are captured under Safe Food’s future operating model.

**2. To maintain a collaborative regulatory environment that fosters industry and regulatory best practice (system performance).**

This objective takes Safe Food and its accreditation holders beyond a traditional regulatory approach, to one that promotes best practice for industry as a means of achieving sustained compliance, including during times of crisis or change.

These objectives have been designed to reflect current and future needs, such as:

- the objectives of the bi-national food regulation system (in the absence of a Queensland Government food strategy or food regulation agreement)
- the Queensland Government Regulator Performance Framework
- the increasing interrelatedness of supply chains and regulatory systems, and
- the need to balance social, economic, and environmental outcomes.



When these objectives are met, we can expect the following outcomes:

- Practices within regulated sectors demonstrate on-going compliance with food safety requirements.
- Food Safety Schemes are administered in accordance with Safe Food’s regulatory practice principles.

Safe Food will develop a [Regulatory Delivery Plan](#) to inform how these objectives will be met, monitored, and reported on.



## Regulatory Functions

With reference to Safe Food’s regulatory objectives and functions under the FPS Act, and the responsibilities of Queensland Health and local governments the Food Act 2006, Safe Food’s roles and responsibilities as part of the Queensland food regulatory system are outlined in the table below.

Regulatory Function	Roles and Responsibilities
<p><b>To regulate, under food safety schemes, the production of primary produce (PPP) to ensure the produce is safe for human and animal consumption</b></p>	<ul style="list-style-type: none"> <li>• Administer the requirements of the FPS Act and associated regulation, as they apply to Safe Food and its Board of Directors</li> <li>• Investigate and respond to food safety complaints relating to activities captured under a food safety scheme (includes non-accredited activities)</li> <li>• Undertake the functions of the food recall action officer for food recalls relating to foods produced or processed by an accredited activity.</li> <li>• Support Qld Health to investigate and respond to non-compliances with Chapters 1 or 2 of the Australia New Zealand Food Standards Code (as applied under the <i>Food Act 2006</i>), where the non-compliances relate to activities captured under a food safety scheme.</li> <li>• Support Qld Health and local governments to investigate and respond to non-compliances with Chapters 3 of the Australia New Zealand Food Standards Code (as applied under the <i>Food Act 2006</i>), where the non-compliances relate to activities captured under a food safety scheme.</li> </ul>
<p><b>To grant accreditations, and approve documented food safety systems</b></p>	<ul style="list-style-type: none"> <li>• Grant accreditations under the FPS Act, and approve food safety programs and food safety management statements</li> </ul>
<p><b>To monitor the hygiene and operating procedures of PPP businesses</b></p>	<ul style="list-style-type: none"> <li>• Monitor and enforce the requirements of Chapter 3 and 4 of the Australia New Zealand Food Standards Code, as applied under the FPS Act and reg, for activities captured under a food safety scheme.</li> </ul>
<p><b>To approve and train individuals to conduct and review audits to monitor compliance</b></p>	<ul style="list-style-type: none"> <li>• Ensure the integrity of Safe Food’s audit system, through the approval and training of auditors and reviewing the performance of the audit system.</li> </ul>
<p><b>To encourage businesses engaged in PPP to minimise food safety risks by developing and maintaining food safety programs, and developing and adopting quality assurance measures for the primary produce</b></p>	<ul style="list-style-type: none"> <li>• Encourage businesses that undertake the production of primary produce to maintain food safety programs and to adopt quality assurance measures/programs for food safety that align with National food safety standards.</li> </ul>



Regulatory Function	Roles and Responsibilities
<b>To commission research relating to food safety matters for primary produce</b>	<ul style="list-style-type: none"><li>• Undertake, participate, and commission research relating to food safety matters for the production of primary produce.</li></ul>
<b>To advise the Minister about food safety matters relating to PPP and the development or implementation of food safety schemes</b>	<ul style="list-style-type: none"><li>• Advise the Minister about food safety matters relating to PPP and the development or implementation of food safety schemes</li></ul>



## Regulatory Culture

This RDF includes a formal commitment to the five Queensland Government Regulatory Model Practices (RMPs) and their supporting principles:

1. To ensure regulatory activity is proportionate to risk and minimises unnecessary burden
2. Consult and engage meaningfully with stakeholders
3. Provide appropriate information and support to assist compliance
4. Commit to continuous improvement
5. Be transparent and accountable in actions.

These RMPs will support the achievement of policy objectives through better interactions between regulators and stakeholders, resulting in reduced burden and costs for all parties.

These practices and supporting principles will also provide the performance measures against which the agency will monitor and report its performance.

They are consistent with similar principles adopted in other jurisdictions nationally and internationally. The Queensland Government encourages regulators to adhere to the practices, noting the applicability of the practices may vary among regulators, but Safe Food is prepared to formally commit to adhering to all five.

Further information on the RMPs can be accessed [here](#), via the Queensland Government Department of Treasury.

## Regulatory Delivery Model

Safe Food has adopted the UK Department for Business, Energy & Industrial Strategy's Regulatory Delivery Model (the Model) as a foundation for this RDF. The Model comprises three pre-requisites for regulatory agencies to be able to operate effectively:

1. Governance framework
2. Accountability
3. Culture

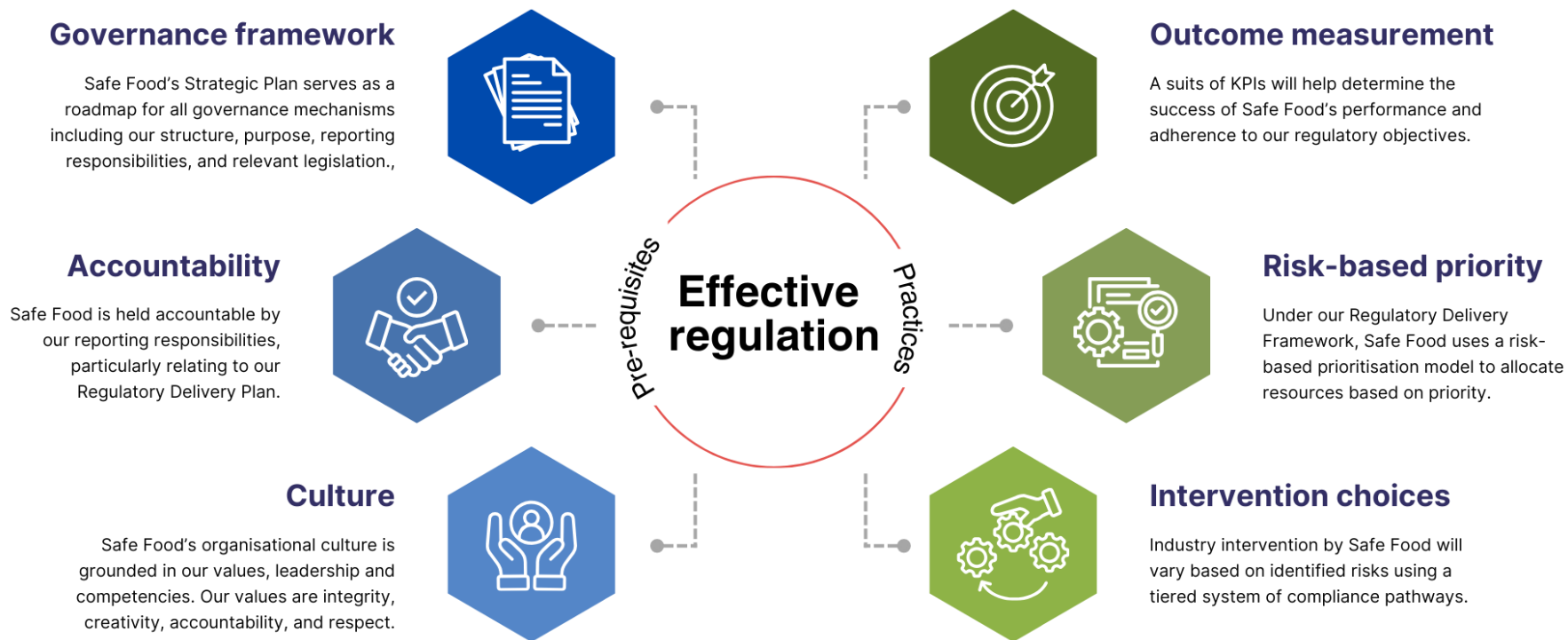
It also identifies three practices that agencies need to deliver societal outcomes:

1. Outcome measurement
2. Risk-based prioritisation
3. Intervention choices





# Regulatory Delivery Model



This report provides a detailed overview of Safe Food's proposed RDF, grounded in these six components of effective regulatory delivery.



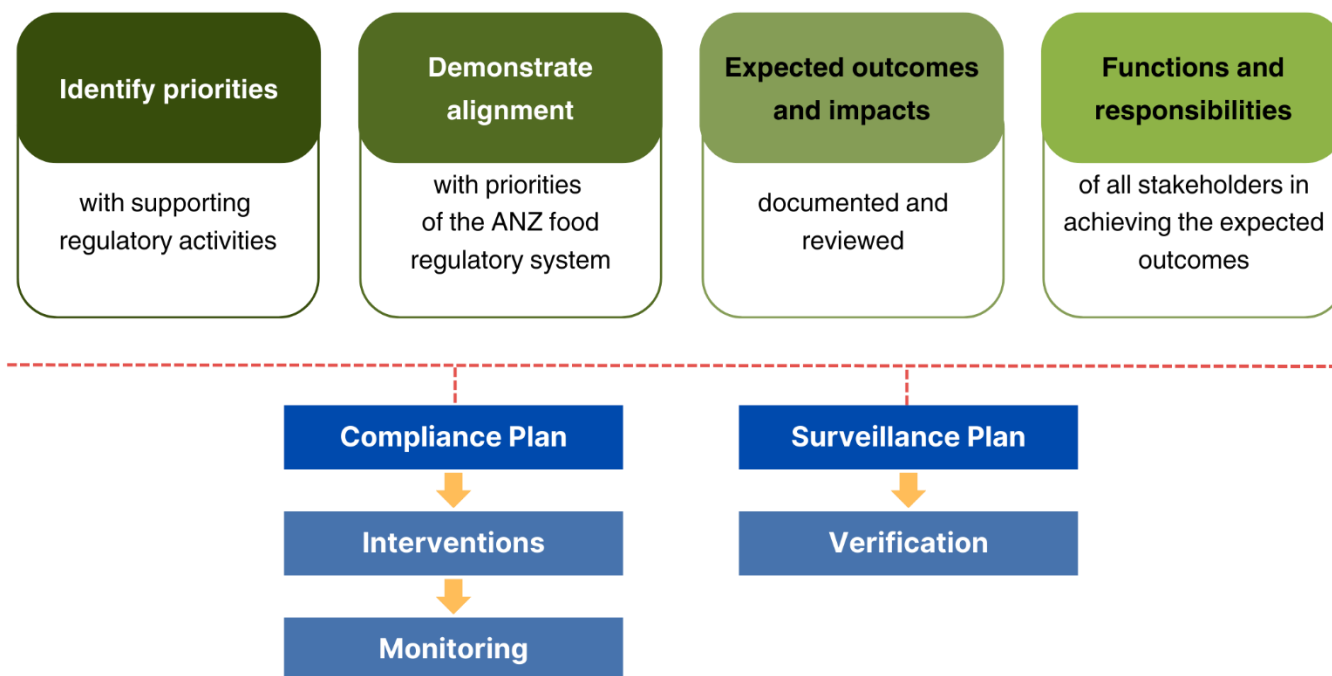
## Regulatory Delivery Plan

The Regulatory Delivery Plan (RDP) will be a unifying plan for all our regulated sectors across the whole of Queensland, capturing activities by Queensland Health, Safe Food, and local governments.

The RDP will identify Safe Food's shorter-term priorities and supporting regulatory activities for the specified three-year and include both a Compliance Plan and a Surveillance Plan. It will also identify the functions, stakeholder responsibilities, expected outcomes and impacts of each regulatory activity in alignment with the bi-national food regulatory system.

The rolling three-year RDP will also seek to drive ongoing industry engagement and collaboration. The RDP will be developed and reviewed annually alongside Safe Food's Business Plan.

The RDP will consist of four key components: Priorities, alignment, expected outcomes and impacts, and functions and responsibilities.





## Success measurement

Safe Food will design a suite of key performance indicators (KPIs) and success measures that will help evaluate the agency's performance in achieving its two [regulatory objectives](#).

The KPIs will aim to evaluate Safe Food activities across four key categories:

	Inputs	Activities	Outputs	Outcomes	Impacts
Effects, impacts and outcomes					<ul style="list-style-type: none"> <li>Decreasing incidents and complaints</li> <li>Decreasing regulatory impost</li> <li>Increasing risk awareness</li> <li>Increasing industry reputation</li> </ul>
Behavioural outcomes			<ul style="list-style-type: none"> <li>No. of businesses assigned to each compliance pathway</li> <li>Rate of progression to lower compliance pathways</li> </ul>	<ul style="list-style-type: none"> <li>Distribution of risk profiles</li> <li>Compliance rates and trends</li> <li>No. of businesses in lowest compliance pathway</li> </ul>	
Activities and outputs		<ul style="list-style-type: none"> <li>Accreditation</li> <li>Auditing and auditor approval</li> <li>Industry program recognition</li> <li>Data analysis and scientific research</li> </ul>	<ul style="list-style-type: none"> <li>Number of accreditations</li> <li>Number of audits</li> <li>Guidance on emerging risks</li> </ul>		
Resource efficiency	<ul style="list-style-type: none"> <li>No FTEs</li> <li>Budget</li> </ul>		<ul style="list-style-type: none"> <li>Regulatory functions</li> <li>Responsibilities with Queensland food regulatory system</li> </ul>		

This wide scope of evaluation will provide a complete understanding of agency performance.



Outcome measurement will also help Safe Food identify the effectiveness of specific compliance activities and adapt strategies and decisions as required to support regulatory objectives.

The KPIs will include leading and lagging indicators that can be shared exclusively with businesses to indicate their performance relative to industry averages. That data can then be used to report on trends in food safety across the regulated sectors and to interpret overall performance of the regulatory system.

This will also provide indicators for regulator best practice, which will be supported by data collected through Safe Food's RPM.

### **Risk Prioritisation Model**

The fundamental shift in this RDF relates to the Risk Prioritisation Model (RPM) that informs resource allocation and regulatory activities and functions based on the thorough assessment of risks associated with individual operations. The RPM will ensure risks are mitigated based on priority level.

The RPM also considers external drivers such as national and state-wide priorities, scientific data, and intelligence on emerging industry risks. It is closely linked with the agency's performance and outcome measurements.

This approach also supports a risk-based fee setting process that incentivises sustained compliance relating to food safety and business practices.

The RPM consists of four main elements: Accreditation, risk assessment, compliance, and surveillance.





## Accreditation

The requirements for business accreditation are prescribed under the regulation and are determined by two key factors:

- the requirements of national standards adopted by the scheme; and
- a system-wide assessment to determine the most appropriate points along a supply chain to apply regulatory interventions.

Accreditation is acquired through a digital application and assessment process by which we collect a range of operational and business data about each business. Accredited businesses will be placed in a legislated risk category (low, medium, or high) based on the data shared with Safe Food and the inherent food safety risks associated with that operation.

Not all activities captured by a food safety scheme require Safe Food accreditation.

## Risk Assessment

Safe Food will apply a risk assessment framework (similar to a risk matrix) to each application for accreditation which will consider both internal and external factors, along with inherent business risks, that may impact the overall risk of the activities being undertaken by each business.

The assessment is supported by data analytics and predictive modelling and relies on the identification of all food safety risks and business behaviours necessary to mitigate those risks.

Using weighted values as part of the risk assessment, each business will be allocated a risk rating based on the analysis of trusted data sources including:

- the business profile information of accredited businesses, including regulatory risk categories
- verification tools (e.g. audit reports, assessments, shared process data)
- compliance tools (e.g. notifications, complaints, show cause notices)
- surveillance and research activities (e.g. sampling surveys)
- response activities (e.g. complaint and foodborne illness investigations)
- external sources including other government agencies (e.g. weather, food recalls, foodborne illness notifications, CPIs, DAFF, third-party programs).

Risk ratings are calculated based on number of variables including but not limited to risk awareness, provisions, and commitment to risk mitigation. Greater weight will be placed on risk mitigation measures.

Safe Food approach to assessing food safety is holistic, assessing risk management by the strategic production chain known as PICMT:

### **Prevent**

Prevention begins with reducing the initial risk from a hazard before it enters the production system using a risk mitigation process.

### **Identify & Isolate**

Where a hazard cannot be removed, a risk management system must be in place to identify the hazard and either segregate affected product or manage the risk effectively to reduce the impact on finished product.



### **Control**

There are a range of systems that ensure ongoing management of potential impact of a hazard, such as procedures, protocols, and programs. Food safety programs that incorporate prerequisite programs are forms of control systems in place.

### **Maintain**

Once the hazard has been identified and controlled, the production process and product are held in the same state so as to not contaminate or alter product in any way that could introduce a new hazard or increase the risk of the product. Implementation of these maintenance processes must include appropriate record keeping and monitoring.

### **Trace**

Traceability systems allow full management of the entire end-to-end production system. They provide an easily available, complete, and accurate way to verify processes and identification, inputs, and outputs from within the production system.

The risk assessment framework can also be applied to activities that do not require an accreditation, although relying on a reduced dataset. This application will help Safe Food provide a more complete assessment of the management of risks outside its accreditation base and to identify unmanaged risks. Unmanaged risks may be managed through the application of compliance tools to accredited businesses at other stages of the supply chain or directly to the unaccredited business.

The risk assessment framework will be reviewed routinely to ensure it remains reflective of current industry conditions.

Through this risk assessment framework, Safe Food's accreditation base can be segmented into categories based on their sector, activity, location, and/or business performance. This will enable Safe Food to implement customised compliance, surveillance, and verification intervention activities.

## **Compliance Pathways**

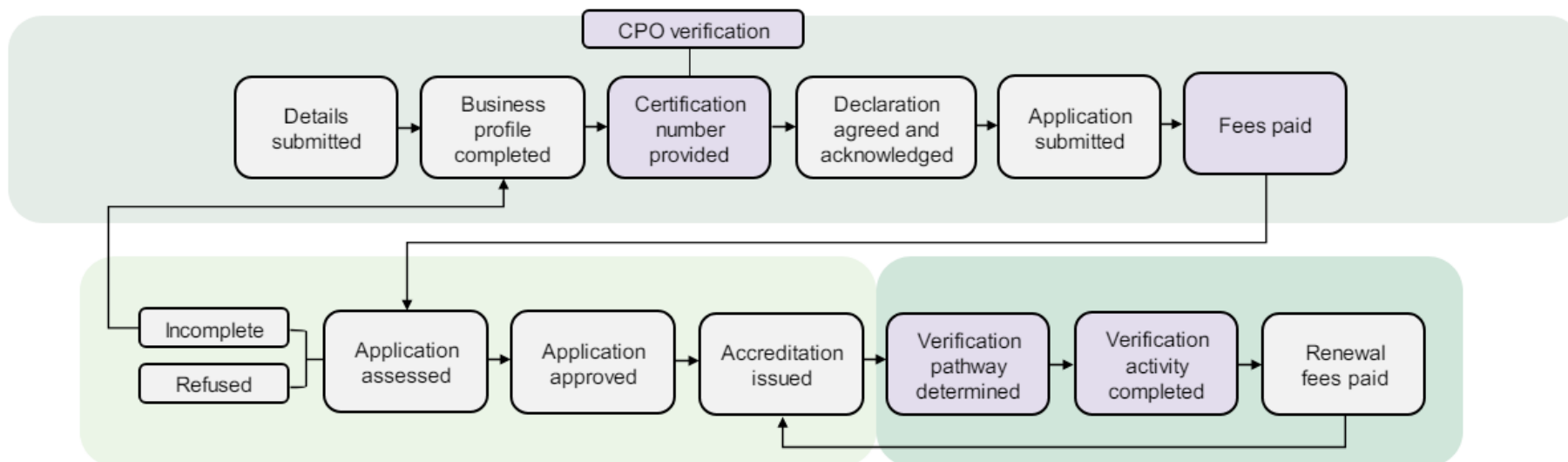
By way of ensuring regulatory delivery is proportionate to business activity, each accredited business will be allocated a compliance pathway based on the outcome of their risk assessment and their assigned risk rating. Compliance pathways will be tiered to allow businesses to rise or fall between levels as their commitment to compliance improves or lessens.

Business with lower risk ratings will be allocated lower-tiered compliance pathways, meaning the intervention by Safe Food will be minimal. This will incentivise compliance and encourage best practice across the regulated sections.



Businesses can undertake two different compliance pathways based on their activities and associated risks. These two pathways are outlined below.

### Pathway 1: Businesses with an approved certification program

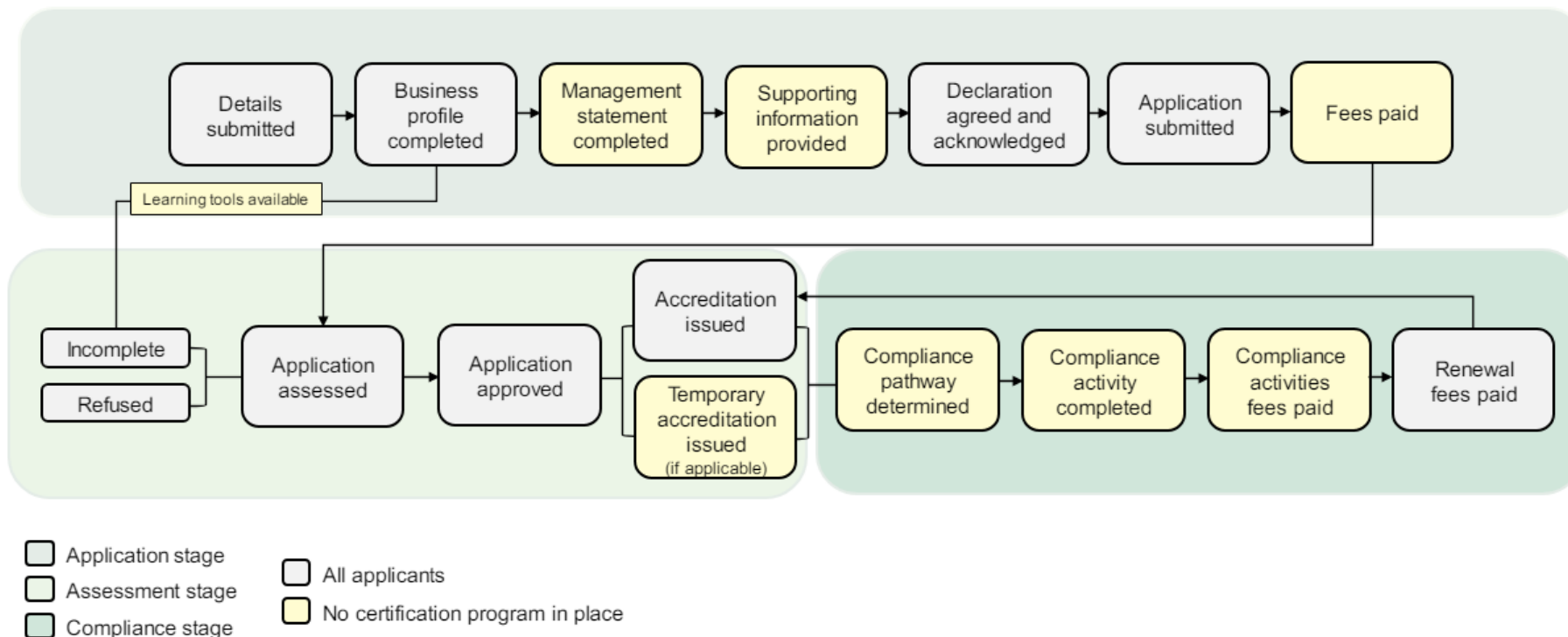


- Application stage
- Assessment stage
- Compliance stage
- All applicants
- Approved certification in place





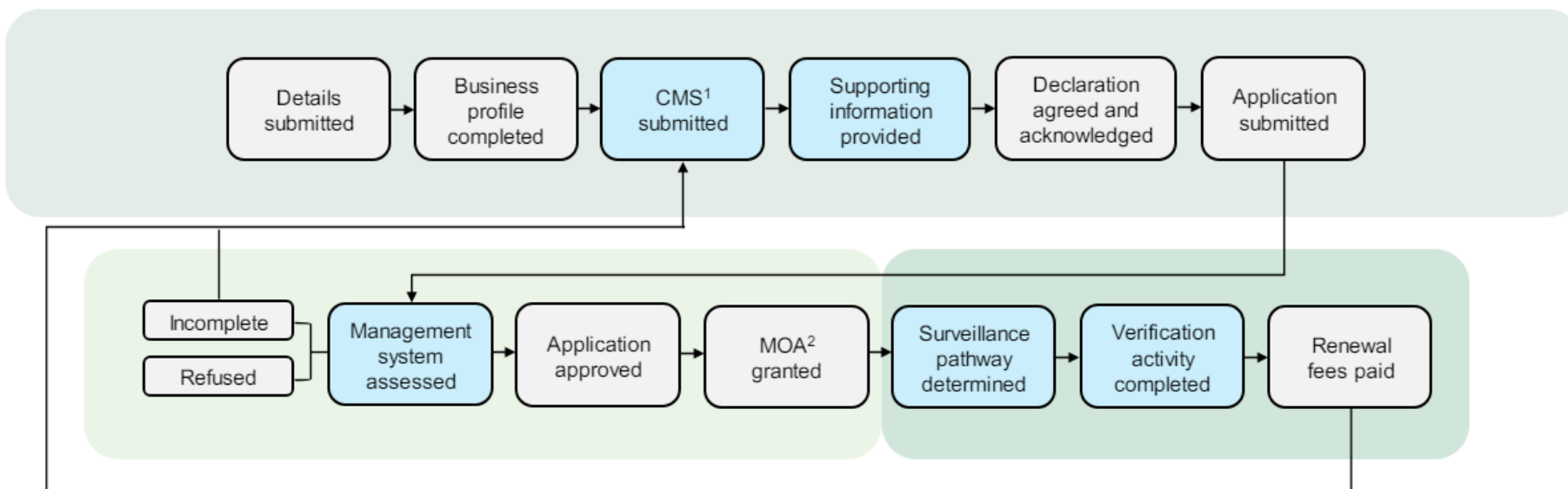
## Pathway 2: Businesses without an approved certification program



For businesses to be accredited under the first compliance pathway, the certification program they operate under must be found compliant by Safe Food. The diagram below illustrates how certification program owners are recognised/approved by Safe Food through a service-level agreement. This agreement will recognise the certification program as part of the accreditation process, including an assessment of said program's compliance with the standards and regulatory requirements.



### Pathway 3: Certification program recognition



- Application stage
- Assessment stage
- Compliance stage
- All applicants
- Approved certification in place

<sup>1</sup> Certification management system

<sup>2</sup> Memorandum of Agreement



## Surveillance Plans

Surveillance plans are designed to support all food safety schemes through a range of verification activities. This is critical to ensuring regulatory compliance, protecting public health interests, and fostering a culture of accountability and continuous improvement across all regulated industries.

The core purposes of surveillance plans are:

- to test and prove the effectiveness of food safety controls administered by Safe Food; and
- to scan the food supply chain for new unmanaged food safety risks that may emerge.

Surveillance and verification activities seek to ensure that:

- auditors are conducting audits to the satisfaction of Safe Food
- approved programs comply with the requirements of their related food safety scheme, and
- the food safety scheme is effective in delivering safe and suitable food for human or animal consumption.

While both surveillance and verification activities under the plan are aimed at ensuring compliance, surveillance plans involve continuous monitoring across a broad scope, whereas verification plans focus on targeted assessments to validate compliance with specific requirements or standards. Both can be informed by the outcomes of scientific research and surveys and by state and national priorities.

Each surveillance plan will be developed collaboratively with specialists, industry participants, and regulatory agencies within Queensland and in other jurisdictions.

## Monitoring and Intervention

The FPS Act gives Safe Food flexibility regarding how it may monitor compliance with food safety schemes provided the method/s are considered appropriate to the nature of the business and the risks associated with the business.

This RDF will allow Safe Food to maintain a toolkit of both monitoring and intervention activities that allow the agency to address risk in a fair and proportionate manner, focusing on incentivising compliance. All intervention activities will be designed to build and maintain trust with industry, consumers, governments, and the public. Each compliance pathway will use a range of intervention activities to capture a full picture of compliance and risk mitigation.

This RDF aims to be agile in response to industry innovations. Existing tools may be refined, and new tools may be developed based on industry needs. This is in keeping with the agency's commitment to continuous improvement.

Refer to our [Operating Model](#) for more information on our intervention activities.

## Operating Model

As noted in the PRISM report, Safe Food's current operating model has "eliminated and reduced inconsistencies, using a cooperative approach with stakeholders, and targets to optimise resources, reduce costs, and create greater efficiencies. The agency's aims to be more science-based incorporating more data and evidence to support decisions, improve outcomes, and look for trends."



Safe Food’s is capitalising on these benefits and opportunities by designing and implementing a refreshed operating model, based closely on the Model for effective regulatory delivery. This operating model will consider the five RMPs that steer Safe Food’s operational activities and its ability to plan, deliver, and describe our success against our regulatory objectives and expected outcomes. The table below details how our actions will support each of the RMPs:

Queensland Government Regulatory Model Practice (RMP)	Supporting action(s) / output(s)
<b>Ensure Regulatory activity is Proportionate to Risk and Minimises Unnecessary Burden</b>	Safe Food will develop, publish, and maintain a rolling three-year <a href="#">Regulatory Delivery Plan</a> (RDP) in collaboration with their stakeholders. This plan will: <ul style="list-style-type: none"> <li>• identify priorities, supporting regulatory activities, and expected outcomes and impacts</li> <li>• identify planned intervention activities to ensure compliance across regulated sectors including businesses and systems</li> <li>• maintain tiered compliance pathways as part of the accreditation process to identify risk-based categorisation of businesses.</li> </ul>
<b>Consult and Engage Meaningfully with Stakeholders</b>	Safe Food will host regular industry engagement meetings to share relevant information with regulated sectors and seek input on subjects of interest.
<b>Provide Appropriate Information and Support to Assist Compliance</b>	Safe Food will maintain and publish a <b>Compliance Policy</b> which will include relevant decision-making guidelines for compliance activities undertaken by Safe Food. Safe Food will also publish information and resources for accreditation holders to support them in maintaining their food safety compliance.
<b>Commit to Continuous Improvement</b>	Safe Food will maintain a transparent reporting structure inclusive of a performance measurement system to help us identify gaps and areas for improvement. The RDP will also lay out clear actions to address these opportunities each year. Success measurement KPIs are available in our Strategic Plan with more specific KPIs to be developed as part of this RDF.
<b>Be Transparent and Accountable in Actions</b>	Safe Food will develop, publish, and maintain a <b>Responsibility and Accountability Statement</b> , which maps all its functions, stakeholders, and their responsibilities for each function within the jurisdiction. Other key reporting mechanisms will be publicly available as usual, as outlined in our <a href="#">Governance Framework</a> .



## Intervention Choices

All intervention activities will align with the RMPs, to provide appropriate information and support to assist compliance. Safe Food will maintain a regulatory toolkit of mandatory and voluntary intervention choices to support compliance and promote best practice food safety management systems, including the provision of timely and targeted information and support.

Through its powers under FPS Act and FPS Regulation, Safe Food has developed, trialled, and implemented a range of intervention choices each designed to be responsive and to minimise regulatory burden. The agency has been fortunate in this regard, as its legislation (while founded on audit as a primary tool) provides a degree of flexibility for Safe Food to apply other monitoring tools provided industry consultation is undertaken.

There is also a degree of flexibility with how and when fees and charges are applied to businesses. Except for application and accreditation fees, fees for service (e.g. audit fees) are set and reviewed by the Safe Food Board and can therefore be adjusted without the need for legislative change.

Compliance to food safety schemes may be monitored by one or more intervention choices appropriate to the nature of the business. Best practice regulation encourages a range of intervention choices to allow for responsive and proportionate intervention, thus allowing more focus on improving culture towards compliance.

Proportionate intervention also allows for the acute identification of reasons for non-compliance, once again focusing our efforts on reducing future risk and encouraging improvement in compliant behaviours.

The following table outlines the intervention tools and activities, including approval, compliance, verification, and surveillance activities, that Safe Food will apply under the new framework:



Intervention Method	Description	Appr	Comp	Verif	Surv
<b>Accreditation</b>	The legal instrument that authorises the production and/or processing of primary produce under the <i>Food Production (Safety) Act 2000</i> . Issued under one of the following food safety schemes – meat; egg; dairy; horticulture; and seafood by way of an application to Safe Food including business profile data. Subject to maintenance conditions.	x			
<b>Food safety program</b>	Documentation that details how an accredited business manages its food safety risks.	x			
<b>Food safety management statement</b>	A business' holistic approach to regulatory compliance including operational practices and food safety systems	x	x		
<b>Food safety audit</b>	A systematic, independent, official examination of evidence that is evaluated objectively to verify an accredited business is meeting their food safety obligations. May be conducted on-site or through a desktop review. Refer to <a href="#">Auditing</a> for more information.			x	
<b>System audit</b>	An audit of a food safety management system to ensure its integrity.				x
<b>Food safety assessment</b>	A systems-based assessment of accredited businesses, which is conversation-based and focusses on the business as a whole and the outcome of procedures. Generally targeted at low-risk accreditations and those with a history of good compliance.			x	
<b>Inspection</b>	A formal or official viewing or examination of activities conducted by a business as part of their accreditation with Safe Food.		x	x	x
<b>Food safety baseline</b>	A document which outlines a food production system, its food safety risks and how those risks are managed.		x		x
<b>Data sharing arrangements</b>	Arrangements with a business to provide regular and timely indicators on individual business' production systems. The indicators are drawn from food safety baselines and may include industry agreed targets.		x	x	x
<b>Food Safety Officer</b>	A person nominated by the accreditation holder with the authority and ability to manage and give directions on food safety matters.		x		
<b>Self-Assessment</b>	An assessment undertaken by an accreditation holder to ensure their risk mitigation procedures are effective.			x	
<b>Industry Program Recognition</b>	Safe Food's recognition of an existing industry certification program/scheme operated by a Certification Program Owner as part of the accreditation process.			x	
<b>Voluntary Compliance Scheme</b>	A non-regulatory food safety scheme for food businesses that do not require an accreditation. The scheme enables the businesses to access a range of tools and benefits available to accreditation holders, such as training courses and industry alerts.	x			



<b>Training elements</b>	Mandatory training courses or activities that must be completed to maintain Safe Food accreditation.	x	x		
<b>Survey</b>	Planned sampling activities regarding food production systems and supply chains.				x
<b>Prevention Plan</b>	A plan that aims to proactively prevent a known or potential threat. Developed by Safe Food in partnership with the affected sector to include self-assessments and guidance documents, among other tools.			x	
<b>Show Cause Notice</b>	A formal warning of non-compliance in response to an alleged offence, offering a chance to respond before stronger enforcement is taken.		x		
<b>Penalty Infringement Notice</b>	A ticket and fine for non-compliance/an alleged offence.		x		
<b>Notification</b>	When an accredited business notifies Safe Food of a food safety issue within the business.		x	x	
<b>Complaint</b>	A notice to Safe Food, either by a business or a member of the public, of a witnessed food safety concern, followed by an investigation carried out using appropriate intervention methods.		x		
<b>Warnings</b>	Written warning to detail the nature of a confirmed breach of the Act, relevant clauses of legislation, and maximum penalty for the offence, and Safe Food's intention to enforce the legislation by appropriate means.		x		
<b>Service level agreements</b>	Agreements between Safe Food and another party, which aim to support Safe Food to meet its regulatory practice principles. As examples, an SLA can document agreed alternative methods of compliance, recognise other systems (such as export systems and industry programs) or enabling the sharing of data between Safe Food and a holder of accreditation.	x	x		

**Approval activities:** Tools to support accreditation assessment, monitoring, and management.

**Compliance activities:** Tool to ensure specific activities are meeting minimum requirements.

**Verification activities:** Tool to verify whole-of-system operations are meeting minimum requirements.

**Surveillance activities:** Tool to verify ongoing compliance.



## Auditing

While auditing is only one intervention choice, there are five types of audits Safe Food, or an approved third-party auditor may undertake to verify a business' compliance to food safety standards:

<b>Annual or Bi-annual</b>	Standard legislative compliance audit based on risk of activity.
<b>Non-conformance</b>	Audit resulting from a non-satisfactory compliance audit. Potential to be specific or holistic.
<b>Spot check</b>	Targeted audit following a notification or complaint.
<b>Verification</b>	Audit to verify compliance of a newly introduced product or procedure.
<b>Export</b>	Audit conducted on behalf of the commonwealth alongside an audit report or export checklist

## Governance Framework

Safe Food maintains a comprehensive governance framework to ensure all operations align with our legislated functions as articulated in the FPS Act.

### Reporting Responsibilities

Safe Food's operations are documented and published across a comprehensive reporting system comprised of six documents:

- Regulatory Delivery Plan (RDP)  
A detailed action plan supporting regulatory model practices to be developed for the whole of Queensland and reviewed annually alongside the Business Plan.
- Business Plan  
Overarching business trajectory of Safe Food as an independent government agency.
- Responsibility and Accountability Statement  
To be developed with input from Queensland Health, DAF, and LGAQ and reviewed annually alongside the RDP. Reflective of our regulatory purpose, objectives, and functions.
- Compliance Policy





To be reviewed to reflect new RDF including regulatory toolkits.

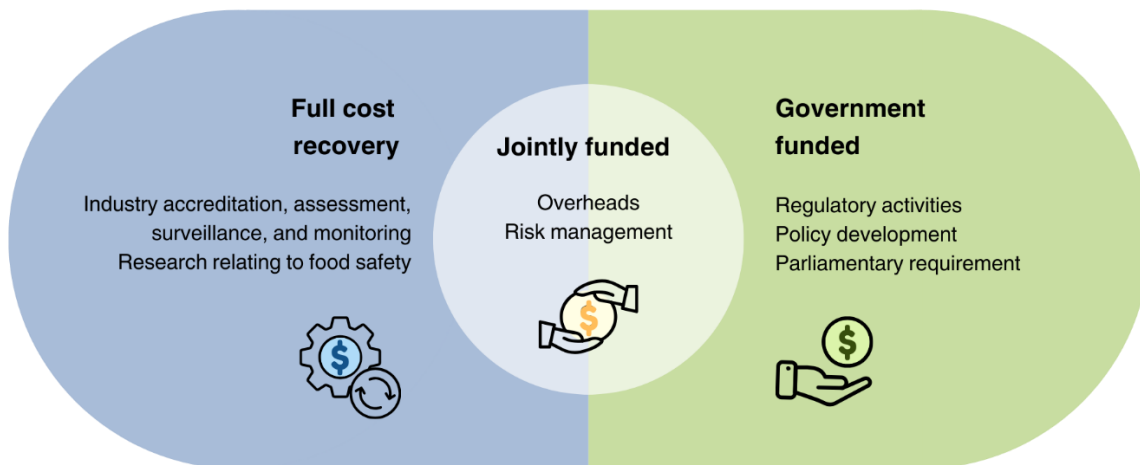
- Annual Report
- Queensland Regulator Performance Report
- Quarterly Report to the Minister

## Funding Model

Safe Food's objectives and functions are governed by the agency's Activity Funding Map.

Generally, activities supporting Safe Food's first regulatory objective (compliance) are cost recoverable, while the activities undertaken to support the second objective (system performance) relate to activities either fully or partially funded by Safe Food's annual grant, which is controlled by the Department of Agriculture and Fisheries.

Below is a summary of Safe Food's current funding governance, which will need to be reviewed under the new RDF.



## Organisational Structure

Safe Food's organisational structure will need to be reviewed in light of the new RDF. This will be considered as part of Safe Food's future Operating Model and Workforce Strategy.

However, current legislative organisational arrangements under the FPS Act, including Board governance and CEO powers, will not need to change.

## Accountability

This RDF seeks to improve transparency and accountability for all stakeholders and will do so through the implementation of a comprehensive success management system, which will be a key component of the RDP. This system will apply a program logic to evaluate four key aspects of Safe Food's operations: Inputs, activities, outputs, outcomes, and impacts.

Clarity around the specific roles and responsibilities of Safe Food as they pertain to each of our regulatory functions will also support accountability across the agency.

Transparency will also be improved through the collaborative regulatory environment that will foster industry and regulatory best practice under this new RDF.

The bi-national food regulatory system has put forward a draft of seven specific commitments that food regulators must fulfil, which Safe Food hereby accepts:



1. Facilitate harmonised food regulation across Australia,
2. Make decisions in line with good regulatory and corporate governance practices,
3. Develop, publish, and maintain a map of current functions and responsibilities to support all regulators' autonomy,
4. Develop, publish, and maintain and rolling three-year Regulatory Delivery Plan in collaboration with stakeholders,
5. Seek continuous improvement through operating models,
6. Operationalise risk-based approaches to regulation, and
7. Maintain appropriate performance indicators.

Our governance model will hold us accountable against each of these seven actions.

These actions also provide greater clarity for stakeholders and support fundamental transparency and accountability across all regulator operations and activities. These actions, along with Safe Food's existing reporting arrangements, have also been considered with reference to the draft Safe Food regulatory principles and the Queensland Government RMPs.

### Sponsors

Safe Food's government sponsors are the Minister and the Department of Agriculture and Fisheries. Under the FPS Act, the Board must report quarterly to the Minister and provide an annual Business Plan. These documents help build Safe Food's capability by highlighting current issues and challenges.