

# Standard 3.2.2A guideline for school canteens

*Recent changes to the Australia New Zealand Food Standards Code introduced new food safety requirements for school canteens.*

In NSW, the changes apply from 8 December 2024 and affect school canteens that prepare and sell unpackaged, ready-to-eat food that requires temperature control.

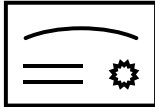
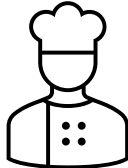

For the purposes of this guideline, a school canteen:

- sells food and drinks to school students through an arrangement with the school on a regular and recurrent basis (at least once per fortnight)
- is run by the school itself, parent groups, other volunteers or a third-party, on school grounds.

It does not include canteens at sporting events or providing food to boarding school students.

## The requirements

Standard 3.2.2A introduces 3 mandatory food safety management tools for food businesses, depending on their food handling activities. These tools are:

 <p><b>1. Food Safety Supervisor</b></p> <p>A business must have a Food Safety Supervisor who:</p> <ul style="list-style-type: none"> <li>• is qualified, and</li> <li>• can give advice to employees who handle food.</li> </ul>	 <p><b>2. Food handler training</b></p> <p>All staff who handle food must have appropriate skills and knowledge of food safety and hygiene.</p>	 <p><b>3. Showing food is safe</b></p> <p>A business must be able to show they are managing key food safety risks by either:</p> <ul style="list-style-type: none"> <li>• demonstrating safe food handling practices, <b>or</b></li> <li>• keeping records.</li> </ul>
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In NSW, local councils inspect most retail food businesses, including school canteens, under the Food Regulation Partnership with the NSW Food Authority. The Food Authority is encouraging councils to initially take an educative approach while businesses adjust to the new requirements.

## Who the requirements apply to

The Standard applies to all food services and businesses that sell or serve food that is:

- potentially hazardous (requires temperature control)
- ready-to-eat, and
- not in its original package.

## Definition of food business

According to the Food Standards Code, a food business is one that handles food intended for sale, or is involved with the sale of food, regardless of whether it is of a commercial, charitable or community nature. Therefore, most school canteens are considered food businesses and the requirements apply.

The definition of 'sale' in the Code is very broad and includes providing food under a contract of service (whether or not the contract is with the consumer).

Further guidance is provided in this document. If you are still unsure whether the Standard applies to your circumstances, phone the Food Authority helpline on 1300 552 406.

## Exclusions



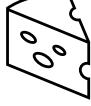



In NSW, Standard 3.2.2A does not apply to the following:

- the handling or sale of food for the purpose of raising funds solely for community or charitable causes, and providing food for free
- food businesses licensed with the NSW Food Authority
- businesses that only manufacture or wholesale food with no direct sale to consumers
- businesses that do not serve or sell unpackaged food that is potentially hazardous and ready-to-eat.

## Potentially hazardous foods

Potentially hazardous foods have certain characteristics that support the growth of bacteria, or the production of toxins, and must be kept at 5°C or colder, or 60°C or hotter, to stay safe to eat. They are foods you would keep in the fridge at home.

Examples of potentially hazardous food include:

 <p><b>Raw and cooked meat and poultry</b></p> <p>Deli meat, burgers, curries, kebabs, pâté, meat pies</p>	 <p><b>Foods with eggs, beans and nuts</b></p> <p>Quiche, aioli, mayonnaise, mousses, tofu</p>	 <p><b>Dairy and foods containing dairy</b></p> <p>Milk, dairy desserts, fresh cream, custard, cheese</p>	 <p><b>Cooked rice and pasta</b></p> <p>Fried rice, plain rice, spaghetti, carbonara, lasagne</p>
 <p><b>Seafood and foods containing seafood</b></p> <p>Sushi, prawns, fish, mussels, oysters, shellfish</p>	 <p><b>Sprouted seeds</b></p> <p>Alfalfa sprouts, clover sprouts, chickpea sprouts</p>	 <p><b>Cut fruits and vegetables</b></p> <p>Cut melon, salads, pre-cut vegetable sticks</p>	 <p><b>Foods containing any of these foods</b></p> <p>Sandwiches, pizzas, rice rolls.</p>

Foods not considered potentially hazardous include:

- raw whole fruit and vegetables
- bread
- biscuits
- crackers and crispbreads
- plain cakes.

For more information, see:

- [Managing potentially hazardous foods](#)
- [Potentially hazardous foods: Foods that require temperature control for safety \(pdf 404 KB\)](#).

## Tool 1 - Food Safety Supervisor

School canteens in NSW must appoint a certified Food Safety Supervisor (FSS) by 8 December 2024 if they prepare and serve food that is:

- unpackaged
- potentially hazardous (requires temperature control)
- ready-to-eat.

An FSS is someone associated with the business who is certified to have skills and knowledge in food safety, especially around high-risk foods.

Food Safety Supervisors give businesses a better level of protection. They:

 <p><b>Oversee day-to-day food handling</b></p>	 <p><b>Ensure food safety risks are managed</b></p>	 <p><b>Share skills and knowledge</b></p>	 <p><b>Promote positive food safety practices</b></p>
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### How to become a Food Safety Supervisor

Food Safety Supervisor training is delivered by approved Registered Training Organisations (RTOs). Training is delivered online, face-to-face, in the workplace, or a combination, and can generally be completed in one full day. Course costs, set by the RTOs, range from \$99 to \$200.

There are 2 learning pathways in NSW to achieve FSS certification – hospitality and retail. School canteen staff and volunteers can qualify to be an FSS through either pathway. In NSW the course **must** include either:

Two hospitality units:

- SITXFSA005 – Use hygiene practices for food safety
- SITXFSA006 – Participate in safe food handling practices

**OR**

- One retail unit: SIRRFSA001 – Handle food safely in a retail environment.

Certification is valid for 5 years, after which the business has 30 working days to ensure their appointed FSS completes recertification training with an approved RTO.

### Nominating a Food Safety Supervisor

Canteens nominate their own Food Safety Supervisor. They must have the authority and ability to give direction on the safe handling of food. They should work onsite to oversee food handling but do not have to be there all the time. It may be the canteen manager, paid staff, a regular volunteer or a teacher who is involved with the canteen at the school.

A copy of the FSS certificate must remain on the premises.

## Steps to complying with the Food Safety Supervisor requirement

1. Choose who will be the FSS.
2. The chosen staff member or volunteer completes the training and assessment through an approved RTO.
3. The FSS receives a Statement of Attainment and a NSW FSS certificate. A copy of the certificate must be kept on the business premises.
4. After 5 years, the FSS completes recertification training and assessment for an updated NSW FSS certificate and an updated Statement of Attainment for the required units of competency.

More information is available on the Food Authority website:

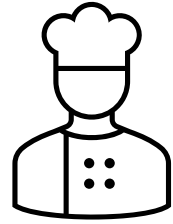
- [Food Safety Supervisors](#)
- [Approved training providers](#)
- [Guideline to Food Safety Supervisor requirements](#) (pdf 555KB)

Figure 1: Example of a Food Safety Supervisor certificate.



## Tool 2 – Food handler training




School canteens handling and serving unpackaged, potentially hazardous food, must ensure their food handlers have appropriate skills and knowledge in food safety and hygiene by 8 December 2024. This is different to the Food Safety Supervisor requirement.



Canteens can choose how food handlers are trained. They may use or recognise free online food safety training programs, past experience, internal training tailored to suit their own procedures, or courses from vocational training providers.

Additional training is not needed if food handlers can already demonstrate adequate skills and knowledge for their duties.

If opting for food handlers to undertake a food handler training course, it must cover:

 <p><b>Safe handling of food</b></p> <p>Temperature control for potentially hazardous food, understanding the temperature danger zone</p>	 <p><b>Food contamination</b></p> <p>Strategies to separate raw and cooked food, allergen management, food storage, and use of separate utensils and chopping boards</p>	 <p><b>Cleaning and sanitising</b></p> <p>Correct procedures for cleaning then sanitising, using food-safe chemicals and/or heat as a sanitiser</p>	 <p><b>Personal hygiene</b></p> <p>Obligations for sick employees, handwashing, uniforms and grooming of hair, nails and skin.</p>
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### Free training available

The NSW Food Authority's free online Food Handler Basics training course can help school canteens meet food handler training obligations under the Food Standards Code.

The interactive short course covers the basic knowledge required and takes about an hour to complete. It is not the same as Food Safety Supervisor training, which is delivered by certified registered training organisations.

- [Access Food Handler Basics training](#)



### Steps to complying with the food handler training requirement

1. Check whether food handlers have an adequate understanding of the above topics. You may wish to refer to the factsheets available at [foodauthority.nsw.gov.au/resource-centre](https://foodauthority.nsw.gov.au/resource-centre).
2. Set aside at least 1 hour for each food handler who requires training to complete the Food Authority's free Food Handler Basics course, or develop and deliver in-house training.
3. It is recommended you keep a record of training food handlers have completed to show authorised officers on request.

### Tool 3 – Showing food is safe

School canteens that undertake higher risk food handling need to be able to demonstrate safe food practices under Standard 3.2.2A of the Code by 8 December 2024. This requirement ensures canteens are actively monitoring and managing key risks related to temperature control, processing, and cleaning and sanitising, which are critical for food safety.

Canteens can meet this requirement by either:


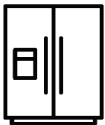

 <p><b>Demonstrating safe food handling practices</b></p>	OR	 <p><b>Keeping records</b></p>
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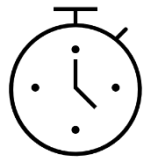

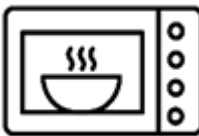

### Who this requirement applies to

This requirement applies to businesses that **process** potentially hazardous food into a food that is ready-to-eat **and** potentially hazardous, and serve it to consumers. “Process” is defined as chopping, cooking, drying, fermenting, heating, thawing and/or washing. For example, the requirement applies to a canteen that cooks meat – such as for a meat and pasta dish, or curry. The raw meat (potentially hazardous food) is cooked (processed) and the food is potentially hazardous when served.

### What needs to be shown

Businesses must be able to show they are monitoring and managing the following (where applicable):

Activity	Food safety requirement
<p><b>Receipt</b></p> 	<p>A food business must take all practicable measures to ensure it only accepts potentially hazardous food (PHF) at a temperature of:</p> <ul style="list-style-type: none"> <li>• 5°C or below; or</li> <li>• 60°C or above, unless the business transporting the food demonstrates the temperature of the food will not adversely affect its microbiological safety due to the time taken to deliver it.</li> </ul> <p><b>What needs to be shown:</b> The temperature of PHF when received OR the time arrangement with the supplier showing that food safety has not been adversely affected during food transport.</p>
<p><b>Storage</b></p> 	<p>A food business must, when storing PHF, store it under temperature control.</p> <p><b>What needs to be shown:</b> The temperature of PHF during storage.</p>
<p><b>Display</b></p> 	<p>A food business must, when displaying PHF, display it under temperature control.</p> <p><b>What needs to be shown:</b> That PHF is displayed at 5°C or below; or 60°C or above, or the total time out of temperature control does not exceed 4 hours (2 hr/4 hr rule).</p>

<p><b>Transport</b></p> 	<p>A food business must, when transporting food, transport PHF under temperature control.</p> <p><b>What needs to be shown:</b> That PHF is transported at 5°C or below; or 60°C or above, or total time out of temperature control does not exceed 4 hours (2 hr/4 hr rule).</p>
<p><b>Pathogen reduction during food processing (cooking)</b></p> 	<p>A food business must, when processing food, where a process step is needed to reduce to safe levels any pathogens that may be present in the food, use a process step that is reasonably known to achieve the microbiological safety of the food.</p> <p><b>What needs to be shown:</b> That pathogen reduction or killing step has been used on PHF to achieve safety of the food (destroy pathogens potentially present). See <a href="#">Processing food safely</a> for guidance.</p>
<p><b>Minimising time during food processing</b></p> 	<p>A food business must, when processing PHF that is not undergoing a pathogen control step, ensure that the time the food remains at temperatures that permit the growth of infectious or toxigenic microorganisms in the food is minimised.</p> <p><b>What needs to be shown:</b> The time that ready-to-eat PHF is in the temperature danger zone (between 5°C and 60°C) is minimised and does not make the food unsafe (see the <a href="#">2-hour/4hour rule</a>).</p>
<p><b>Cooling food</b></p> 	<p>A food business must cool PHF:</p> <ul style="list-style-type: none"> <li>• within 2 hours – from 60°C to 21°C; and</li> <li>• within a further 4 hours – from 21°C to 5°C unless the food business demonstrates that the cooling process used will not adversely affect the microbiological safety of the food.</li> </ul> <p><b>What needs to be shown:</b> That cooked PHF has cooled to prescribed temperatures within the required timeframes.</p>
<p><b>Reheating food</b></p> 	<p>A food business must, when reheating previously cooked and cooled potentially hazardous food to hold it hot, use a heat process that rapidly heats the food to a temperature of 60°C or above, unless the food business demonstrates that the heating process used will not adversely affect the microbiological safety of the food.</p> <p><b>What needs to be shown:</b> That cooked and cooled PHF is reheated rapidly (within 2 hours) to 60°C or above.</p>
<p><b>Cleaning and sanitising</b></p> 	<p>A food business must ensure the following equipment is in a clean and sanitary condition in the circumstances set out below:</p> <ul style="list-style-type: none"> <li>• eating and drinking utensils - immediately before each use; and</li> <li>• food contact surfaces of equipment - whenever food that will come into contact with the surface is likely to be contaminated.</li> </ul> <p><b>What needs to be shown:</b> That eating and drinking utensils and food contact surfaces have been cleaned and sanitised when required (see <a href="#">Cleaning and sanitising surfaces and utensils (PDF, 384KB)</a>).</p>



## Keeping records

'Records' are documents or objects kept for the information they contain, or can be obtained from them. Examples include writing on invoices or templates, photos or footage, data logger information, and verified written instructions, such as a validated recipe or standard operating procedure (SOP).

If making records, they should include the date (and time, if appropriate) and the food or activity it relates to. Records should be made each day the business handles unpackaged potentially hazardous food, unless it can be shown in another way requirements are being met. Once made, records must be kept for 3 months.

## Templates available

A range of free templates are available to help businesses record food temperatures and their cleaning and sanitising activities on the Food Authority website at [Showing food is safe](#).

## Demonstrating safe practices

Records are not needed if the canteen can show in another way it has adequately managed food safety risks. This could include having a written instruction sheet or standard operating procedure, and/or being able to walk and talk an authorised officer through their food handling practices and processes.

## Steps to complying with the showing food is safe requirement

- Ensure food handlers are capable of demonstrating safe food handling practices and processes to an authorised officer, **or**
- Have a written instruction sheet or standard operating procedure that is followed for each of the activities above, **or**
- Keep records of important food safety information, including how you have safely received, stored, processed, displayed, and transported potentially hazardous food, and cleaned and sanitised.

See [Standard 3.2.2A – showing food is safe](#) for more information on this tool.

## Which requirements apply to me?

Which requirements apply to a school canteen depends on the activities they do and the level of risk of harm. For example, a school canteen that cooks and serves meat to children has more controls to implement than one that only reheats packaged food.

Below are some food handling activities that may occur in a school canteen for food for sale and the corresponding requirements that apply. If a business engages in more than one activity, requirements for the highest risk activity apply. If unsure about what applies to your circumstances, please phone the Food Authority helpline on 1300 552 406.

### Definitions:

RTE: Ready-to-eat food

✓ Requirement applies

PHF: Potentially hazardous food

✗ Requirement does not apply

Activity conducted by the school canteen	Standard 3.2.2A requirements		
	Tool 1 - Appoint a Food Safety Supervisor	Tool 2 - Food handlers trained or have relevant skills and knowledge	Tool 3 - Be able to show food is safe
Makes meals and/or snacks from PHF, served as RTE PHF <i>Examples: Cooks meat, fried rice, quiches, bean quesadillas</i>	✓	✓	✓
Makes meals and/or snacks from non-PHF, served as RTE PHF <i>Examples: Cooks dried pasta served with pasta sauce from a jar, cooks rice served with canned tuna</i>	✓	✓	✗
Reheats or hot-holds packaged PHF the business did not make, serves it packaged <i>Examples: Reheats individually packaged lasagnes, pies or sausage rolls from a bulk supplier and serves them to children in their package</i>	✗	✓	✗

Unpackages PHF the business did not make, and slices, repacks, reheats or hot-holds it <i>Examples: Slices cheese or deli meat, reheats bulk or frozen meals, reheats pies, sausage rolls or lasagne, hot-holds meals supplied hot by a caterer, serves food unpackaged</i>	✓	✓	X
Handles and serves unpackaged PHF meals/snacks the service has not made themselves <i>Examples: Makes sandwiches using deli meat, serves pre-cut fruit and vegetables, serves pre-made sandwiches and wraps bought in bulk from a bakery</i>	✓	✓	X
Cuts/slices/chops whole fresh fruit and vegetables <i>Examples: Slices apple, cuts whole carrot into sticks, segments oranges</i>	✓	✓	X
Makes sandwiches with non-PHF ingredients <i>Examples: Vegemite, honey, nut butter, jam</i>	X	✓	X
Chops various whole fruit to make fruit salad <i>Examples: Chops whole watermelon, whole rockmelon, strawberries, banana, apple, orange, mango</i>	✓	✓	X
Serves/sells whole fresh fruit and vegetables for children <i>Examples: Apple, berries and bananas are served whole</i>	X	✓	X
Serves/sells only non-PHF <i>Examples: Popcorn, biscuits, crackers, dried fruit, whole fruit, crispbread, sandwiches with non-PHF ingredients, whole fruit</i>	X	✓	X
Gives replacement food for children who forgot lunch or were supplied unfit food	X	✓	X

## School food education scenarios

The following table outlines how the Standard applies to various food-related initiatives at schools from 8 December 2024.

Scenario	Does 3.2.2A apply?	Why?
A breakfast club in a small remote school is volunteer based and offers food free of charge to children.	No	The food is free to the community – there is no sale.
High school students run a coffee cart/van to fundraise for the school and for hospitality student training.	No	<ul style="list-style-type: none"> <li>The food sold is for fundraising purposes.</li> <li>Heated milk is not captured by 3.2.2A.</li> <li>Non-profit educational activity.</li> </ul>
High school students run a coffee cart/van to fundraise for the school and for hospitality student training. In addition to heating milk, they sell pre-prepared and pre-packaged sandwiches made by the school canteen. They will sometimes operate the cart/van from markets and events outside the school.	No Note: 3.2.2A applies to canteen making the PHF.	<ul style="list-style-type: none"> <li>Food sold for fundraising purposes.</li> <li>Non-profit educational activity.</li> <li>Heated milk is not captured by 3.2.2A.</li> <li>PHF is received and sold packaged (no handling).</li> </ul>
Students produce food for events, including showcases and dinners, as part of their hospitality training. The food they serve is provided free, or for a donation.	No	Non-profit educational activity.
An adult cooking class runs either privately or in cooking schools where participants pay for the class.	Yes	There is a sale of food for profit, as a fee is charged for dedicated food preparation and consumption.

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## More information

- Visit [foodauthority.nsw.gov.au/safetytools](https://foodauthority.nsw.gov.au/safetytools)
- [Changes for school canteens](#)
- Phone the Food Authority helpline on 1300 552 406
- Email [food.contact@dpi.nsw.gov.au](mailto:food.contact@dpi.nsw.gov.au)

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