Food Safety Emergency Sub Plan

A Sub Plan of the NSW Emergency Management Plan

18 March 2021

Contents

1   Introduction

1.1   Purpose

The aim of the NSW Food Safety Emergency Sub-plan is to:

- identify the strategic emergency management arrangements, and

- ensure that resources within the NSW Department of Primary Industries (NSW DPI) and those available from participating and supporting agencies are effectively and efficiently coordinated;

in response to, and recovery from, the impacts and effects on public health and businesses in the food supply chain from a food safety emergency.

1.2   Authority

This Plan is written and issued under the authority of the *State Emergency and Rescue Management Act 1989* (NSW) ('SERM Act') and the NSW State Emergency Management Plan (EMPLAN). In addition to these instruments, the following Acts and Regulations apply to managing food safety:

- Food Act 2003

- Food Regulation 2015

- Biosecurity Act 2015

The NSW Food Authority has legislative responsibility to respond to food safety incidents. Staff are employed by its central agency and are within the NSW DPI. NSW DPI has the responsibility to provide coordination and control of the mobilisation of food-related resources to emergencies in NSW.

This plan is a Sub-plan to the NSW State Emergency Management Plan (EMPLAN). It was approved by the Director General DPI, which is the designated Combat Agency for food safety, on 24 November 2020 and was endorsed by the NSW State Emergency Management Committee (SEMC) on 18 March 2021 (SEMC Meeting 120).

1.2.1   Revision history

Version	Date endorsed	Amendment notes
Version 1	October 2004	First issued
Version 2	November 2009	Complete rewrite
Version 3	March 2021	Complete rewrite in new SEMC template

1.3 Activation

The arrangements in this plan are active at all times and do not require formal activation.

The NSW DPI (inclusive of the NSW Food Authority) as the combat agency will use this plan for major food safety emergencies. The plan will not normally be activated for commonly occurring incidents which are within the capacity of the NSW DPI to deal with through its day to

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day operational activities and are covered by Memoranda of Understanding or protocols (refer to section 1.7).

When this Sub-plan is activated, the NSW DPI will nominate an Incident Controller and an Incident Management Team for the response.

Triggers for use of this plan include:

- Exotic and/or widespread pathogen affecting large numbers of people or food businesses/farms, usually detected from increased presentations to NSW Health.

- Potential for or actual introduction of a harmful pathogen or substance in the food supply chain, usually identified by external intelligence.

- Alerts for events with international implications or origins provided under International Health Regulations 2005 or the INFOSAN (International Food Safety Authorities Network), both under the auspices of the World Health Organisation.

Where exotic pathogens are present on farms, the simultaneous activation of the Biosecurity (animal and plant) sub plan may be necessary if the pathogen is also referenced under the *Biosecurity Act 2015*. In this circumstance a single Incident Action Plan will be developed.

If there are cross border implications where the NSW Food Safety Emergency Sub-plan is activated, the National Food Incident Response Protocol will also be triggered to provide coordination across jurisdictions, with Food Standards Australia New Zealand (FSANZ) providing secretariat support. FSANZ, as the national contact point for INFOSAN, will also provide alerts to international countries that may be affected through food exports.

This plan may also be activated where the NSW DPI is requested to provide support to emergency operations controlled by the State Emergency Operations Controllers (SEOCON) or another Combat agency, for example, in food bioterrorism or tampering emergencies.

1.4 Scope

The arrangements specified in this plan are applicable to a food safety emergency where the NSW DPI is the combat agency and may be applicable to other emergencies where the State response is coordinated under EMPLAN and food safety related issues arise.

This plan describes the state-level emergency management arrangements for food safety hazards affecting NSW. It includes:

- the potential risks and consequences of the emergency to the social, economic, and natural environments
- the policy and programs in place to mitigate these risks before, during and after an emergency
- the control and coordination arrangements for managing a food safety hazard impact
- an outline of the approach to managing a food safety hazard impact and the agencies responsible for managing specific strategies
- the multi-agency management arrangements at the state, regional and local levels, and
- links to sources of information where the reader can obtain further detail

This plan provides the basis for the response to an emergency that endangers, or threatens to endanger, the safety or health of persons in NSW from issues such as:

- Microbial, chemical or physical contamination of food deemed to pose a risk to consumers; or

- Contagious zoonotic disease outbreak in animals used for the production of food for human consumption.

The following areas are not within the scope of this plan:

- Bioterrorism, sabotage, or extortion involving food products (this area falls under the remit of NSW Police); or

- Food Security as the result of a major event or threat (e.g. flood, drought, disease pandemic, financial hardship).

This plan does not include detail about the operational activities of individual agencies.

1.4.1 Assumptions

This plan is based on the following assumptions:

1. all the agencies and organisations with a role or responsibility included in this plan maintain their own capability; including detailed operational plans, adequately trained personnel, and sufficient resources to fulfil their role
2. *triggers for an emergency will be detected through instances such as:*
    - Increased presentations to hospitals and reported by NSW Health
    - Intelligence from other jurisdictions (including international sources) that warrants an emergency response

1.5 Goals

The goals for food safety emergency management are to:

1. Protect public health and safety

    Identify cases of illness or intoxication linked to the emergency; prevent further harm to human health by removing or mitigating the food safety risk.

2. Prevent widespread contamination of food or farms

    Implement measures (quarantine, prohibition on trade or manufacture, mandate additional process or control steps) to prevent spread or contamination of the food supply

3. Protect domestic/international market access

    Minimise or isolate any potential contamination to localised areas or food businesses so that domestic and export markets are protected

4. Prevent loss of confidence in the food supply

    Take swift action to prevent further risk to public health and market access so that consumers and external customers are able to enjoy a safe food supply

5. Promote industry recovery

    Partner with affected food industry sectors and peak bodies to implement corrective actions and assist with market access

1.6 Audience

The audience for this plan is the NSW Government and agencies within the emergency management sector, including non-government organisations (NGOs) business and community groups with a significant role in emergency management.

Other agencies at Commonwealth level include:

- Food Standards Australia New Zealand (FSANZ)
- Australian Government Department of Agriculture, Water and the Environment (DAWE)
- Australian Government Department of Health (DoH)

Although the wider community is not the primary audience, community members may find the contents of this plan informative.

1.7 Linkages

This plan reflects current legislation, the arrangements in the EMPLAN, the strategic direction for emergency management in NSW and the accepted State practice for emergency management. The EMPLAN arrangements have not been repeated unless necessary to ensure context and readability. Any variations from these arrangements have been identified and justified.

Other supporting arrangements and plans include:

- NSW Health/Food Authority Memorandum of Understanding (and NSW Health/DPI Investigation of Foodborne Illness Response Protocol)
- National Food Incident Response Protocol (NFIRP)
- NSW Food Regulation Partnership (Urgent Food Safety Response)
- NSW DPI Emergency Response and Recovery Manual (ERRM)

1.8 Maintaining the plan

The NSW DPI will keep this plan current by:

1. ensuring that all emergency service organisations, functional area and officers included in this plan are made aware of their roles and responsibilities;
2. conducting exercises to test arrangements;
3. reviewing the contents of the plan;
   a. after significant food safety response operations;
   b. when there are changes to the machinery of government;
   c. when there are changes that alter agreed plan arrangements; and
   d. as determined by the NSW SEMC.
4. This plan will be reviewed no less frequently than every five years.

2 The emergency risk context

2.1 The hazard

This plan may be needed under circumstances where there is a major, cross border foodborne disease outbreak which results in mass morbidity and/or deaths, loss of export markets, and

decreased confidence in the food supply.

Such an event has the potential for widespread threat to human health and concern in the general community, food industry, and international market access.

The potential scale and damage of a hazard will be determined through the use of risk estimation tool, which considers the specific threat and cost/benefit of interventions to manage this.

2.2 Consequences

The following may occur as a result of the above hazards:

- Significant loss of life or morbidity resulting in a high burden on the public health system;
- Widespread contamination of the food supply, quarantine of farms, factories and other businesses for an extended or indefinite period;
- Loss of domestic or export markets resulting in major damage to food businesses, NSW, and national economies; or
- Loss of consumer and industry confidence in government and ability to cope with significant emergencies.

3 Prevention

*Our **strategy** is to ensure food safety risks are managed proactively* *The **outcome** is a food industry with appropriate food safety regulations and controls to reduce hazards*	***Actions** we will take to achieve the strategy are:* As part of NSW DPI, the NSW Food Authority licenses, audits and inspects primary production, manufacturing, and handling of food. Businesses classified as high risk are required to implement additional programs to manage hazards.
*Our **strategy** is to provide advice and warnings to consumers of food safety hazards* *The **outcome** is consumers are well informed and able to make safe food choices*	***Actions** we will take to achieve the strategy include* raising community awareness through the provision of information regarding safe food practices.

4 Preparedness

Preparedness includes arrangements or plans to deal with an emergency or the effects of an emergency. Preparedness activities are undertaken by:

- agencies and organisations that have responsibilities before, during and after an emergency; and
- communities, businesses and households that are likely to be affected by food safety emergencies.

4.1 Emergency planning

Strategy	Actions
Maintain NSW DPI Emergency Response and Recovery Manual (ERRM)	1. The ERRM is reviewed annually so that it remains fit for purpose as an operational document for NSW DPI in responding to food emergencies
Participate in national food regulatory working groups, including the ISFR Food Incident Response Working Group	2. Participate in national food regulatory working groups. Continue to Co-Chair the ISFR Incident Response Working Group
Assist with review and refinement of National Food Incident Response Protocol (NFIRP) after each incident	3. Ensure the National Food Incident Response Protocol is an effective tool for coordination of emergencies
Participate in regular reviews of the NSW Health/DPI Foodborne Illness Response Protocol	4. Ensure key operational documents with NSW Health are reviewed and current
Maintain links with key industry stakeholders (retailers, commodity sectors, peak industry bodies, Australian & State/Territory government agencies, local government)	5. Maintain contact lists for key contacts 6. Participate in scenario exercises with government and industry partners through the National Food Incident Forum, or NSW specific exercises

4.2 Operational readiness

NSW DPI will maintain specialist officers in food incident investigations and response. This team will be responsible for oversight of investigations and training of other staff to increase capability.

All field staff will be provided with Emergency Field Operations training.

Senior staff and team leaders will be provided with incident management and emergency supervisor training based on the Australasian Inter-service Incident Management System. Skills will be maintained though participation in exercises (or responses) once every two years.

Equipment for investigations (e.g. PPE, sampling gear) will be maintained and reviewed for operational readiness to ensure there are sufficient stocks on hand.

For significant responses, NSW DPI coordination and control centre facilities will utilised.

The NSW DPI case management system will be utilised to collect and report on textual and spatial information relevant to the emergency response.

4.3 Community resilience

Community resilience is enhanced through the provision of safe food practices information, such as food handling, and information on food that has been recalled.

Information will be provided through various channels, including website, social media, and news networks.

Where necessary, targeted information will be provided in the form of fact sheets, face-to-face community sessions, and meetings with affected food businesses.

5 Response

NSW Health and NSW DPI have established procedures for responding to food safety threats and outbreaks, which are detailed in the NSW Health/DPI Investigation of Foodborne Illness Response Protocol.

NSW Health, under the *Public Health Act 2010*, has responsibility for the investigation of human disease/poisoning to determine a likely source or cause.

NSW DPI, as the combat agency, will control any physical or on the ground response (e.g. inspection and sampling of farms, food manufacturing sites) and take appropriate action to remove or mitigate any threat to public health.

Formal coordination and investigation of an outbreak will occur through a joint NSW Health/DPI Outbreak Investigation Coordination Committee.

The community will be kept informed through coordinated media releases or warnings (e.g. advisories or food recall notices).

Food Tampering, Food Bioterrorism
This plan may also be triggered in the event of a large scale food tampering or terrorism incident. In this event, NSW DPI will be a support agency to NSW Police.

5.1 Concept of operations

Containing the outbreak/hazard and protection of public health and safety

- NSW Health will typically detect an increase in human disease or intoxication and conduct an investigation under the Public Health Act (*Public Health Act 2010*). Information indicating a potential food source or company will be provided to NSW DPI as the combat agency for resolving food safety threats.

- The NSW DPI will appoint an incident controller, who will be responsible for preparing and implementing an incident action plan.

- NSW DPI will provide emergency management coordination and resourcing through actions specified in the Emergency Response and Recovery Manual.

Prevent widespread contamination of food and farms

- Prevention of further risk to public harm and contamination of farms/food will be achieved through use of regulatory tools such as Prohibition Orders (requiring a business to shut down for a specified time until controls are implemented),

Biosecurity Directions (which may result in farm quarantine), and Food Recalls (warning consumers and businesses to discard affected batches of contaminated food).

- These measures can be complemented by public warnings, or advice to international markets through INFOSAN (undertaken by Food Standards Australia New Zealand).

Protect domestic/international market access; prevent loss of confidence in

the food supply

- Isolation of the hazard to a specific food business, commodity, and/or region will enable the incident to be contained and provide assurances to trading partners and the general public that there is no ongoing threat to other commodities or businesses.

Promote industry recovery

- Affected businesses and commodity groups will lead industry recovery efforts. These can be supported by NSW DPI through surveillance and compliance activity, communication, and ongoing research programs.

5.2 Control and coordination

NSW DPI will retain control as the combat agency for any response and will develop and maintain incident response plans detailing objectives and execution.

An Incident Controller will be appointed by the CEO NSW Food Authority as hazard owner under the NSW DPI ERRM.

Where complexity and impact require an Incident Management Team, a Local Control Centre (LCC) will be established. For larger emergencies, multiple LCCs may be established with individual Incident Controllers that report to the State Coordination Centre, as outlined in the ERRM.

NSW Health will support the response by providing real time information on public health impacts, including number of people affected, information on disease/poisoning, geographical spread, ethnicity/age profile.

Local government environmental health officers can be utilised for additional field and operational support under the Food Regulation Partnership agreement.

5.3 Emergency information and warnings

The NSW DPI will develop and oversee distribution of warnings to the public and other stakeholders, specifically around advice about what foods to avoid (typically through food recalls), or dietary advice and handling information.

Warnings will typically be distributed through media outlets, social media, websites, and through other stakeholder networks.

5.4 Inter-jurisdictional support

Support from other jurisdictions and the Commonwealth may be requested through the National Food Incident Response Protocol (NFIRP). This could include assistance in risk assessment and planning, or operational assistance.

5.5 Impact Assessment

An emergency risk profile will be developed to outline the initial impact, and projected impact. This will take into account potential and actual impact on public health (number of people affected, healthcare costs) and economic impact (loss of domestic/export market, value of lost sales, equipment, livestock).

Impact information will be provided to peak industry bodies and sector interest groups responsible for recovery as the emergency develops.

5.6 Withdrawal from response

The response phase would normally be stood down when:

- the source of a pathogen or contaminant has been removed and there is no further risk to public health

- the threat of harm to consumers or industry has been resolved or determined to be no longer a threat.

As part of the demobilisation plan, the relevant documentation, control measures, public health and economic impacts, decision logs and any other relevant information is collated for the purposes of an after action review or incident debrief.

Any ongoing tasks, such as compliance with Biosecurity Directions or Prohibition Orders are transitioned to the appropriate agency for action as part of normal business arrangements.

6 Recovery

The arrangements for recovery operations in New South Wales are outlined in the NSW State EMPLAN and further described in the NSW Recovery Plan.

7 Logistics and finance

Logistics and financial arrangements are described in EMPLAN Part 10 and detailed in NSW DPI supporting operational guidelines.

Emergency management financial delegations for incident management roles and are relevant when an incident management team is established for coordination and control.

Appendix A—Roles and responsibilities

The following roles and responsibilities are in addition to the roles and responsibilities described in the EMPLAN and relate to food safety emergencies.

Agency/Group	Roles and responsibilities
Bi-National Food Safety Network (BFSN)	Coordinates consistent operational response activities, collation and sharing of information across jurisdictions and Commonwealth agencies. Secretariat provided by Food Standards Australia New Zealand.
Food Regulation Partnership	Responsible for consistent, risk-based approach to monitoring of retail food businesses in NSW. Local government environmental health officers may be utilised as a resource for major food incidents.
Food Standards Australia New Zealand	Provides secretariat functions for the BFSN and the National Food Incident Response Protocol. Responsible for drafting of an emergency risk profile for national incidents.
NSW DPI	Provides field officers and technical expertise in food safety investigations and enforcement. Also provides technical specialists for other zoonoses incidents. Encompasses the NSW Food Authority. Provides staff and technical expertise for emergency coordination, stakeholder engagement and communications, disaster recovery, rural resilience.
NSW Health	Conducts human health epidemiological investigation and risk assessment to determine the likely source and impact of a disease or hazard.
NSW Local Councils	Provides Environmental Health Officers to assist with field investigations and enforcement.

Appendix B—Glossary

Readers should refer to EMPLAN Annexure 9 – Definitions. Additional terms not found in the EMPLAN are defined below:

Bi-national Food Safety Network   The Bi-national Food Safety Network is made up of state and territory (and New Zealand) food safety agencies, the Australian Government Department of Health, Department of Agriculture and Water Resources and Food Standards Australia New Zealand (FSANZ). FSANZ provides the secretariat for the bi-national Food Safety Network and its role is to coordinate activities, collate and share information. The National Food Incident Response Protocol may be activated to ensure the national response is timely, appropriate and consistent.

Food Security   A measure of the availability of food and individuals' ability to access it. According to the US Department of Agriculture, household food security exists when all members, at all times, have access to enough food for an active, healthy life. It does not include short term unavailability of select food items where there are other choices for a healthy diet.

Implementation Sub-Committee for Food Regulation (ISFR)   A subcommittee of the Food Regulation Standing Committee, where Australian and New Zealand food regulators meet to discuss and determine common approaches to implementing food standards and responses to food safety incidents.

National Food Incident Forum (FIF)   The Food Incident Forum is a government-industry group established in 2016 to discuss food incidents/issues. Membership includes Australian food industry (associations, groups, sectors, businesses) and Australian government food agencies, as well as the New Zealand Ministry for Primary Industries. Food Standards Australia New Zealand (FSANZ) is the Forum Secretariat.

National Food Incident Response Protocol (NFIRP)   A guide for the coordination of Australian government agencies responsible for food safety and food issues in the event of a national food incident.