

Auditor-General's Report 2 of 2026

## Managing food safety in council areas

Part B: Local government



Auditor-General's Report 2 of 2026

# Managing food safety in council areas

Part B: Local government

---

Tabled in the House of Assembly and ordered to be published, 19 May 2026

---

First Session, Fifty-Sixth Parliament

By authority: T. Foresto, Government Printer, South Australia

---

*The Audit Office of South Australia acknowledges and respects  
Aboriginal people as the State's first people and nations, and  
recognises Aboriginal people as traditional owners and occupants  
of South Australian land and waters.*



[www.audit.sa.gov.au](http://www.audit.sa.gov.au)

Enquiries about this report should be directed to:

Auditor-General  
Audit Office of South Australia  
Level 9, 200 Victoria Square  
Adelaide SA 5000

ISSN 0815-9157



Level 9  
State Administration Centre  
200 Victoria Square  
Adelaide SA 5000  
Tel +618 8226 9640  
ABN 53 327 061 410  
enquiries@audit.sa.gov.au  
www.audit.sa.gov.au

18 May 2026

President  
Legislative Council  
Parliament House  
ADELAIDE SA 5000

Speaker  
House of Assembly  
Parliament House  
ADELAIDE SA 5000

Dear President and Speaker

**Report of the Auditor-General:  
Report 2 of 2026 *Managing food safety in council areas, Part B: Local government***

Under the *Public Finance and Audit Act 1987*, I present this report to each of you. This is one of two reports. This report looks at how the Eastern Health Authority and the City of Tea Tree Gully maintain effective regulatory and other activities that enable food businesses to provide safe and suitable food to the community. The other report looks at how the Department for Health and Wellbeing oversees and supports councils in managing food safety.

This review is a reasonable assurance engagement where we conclude on the performance of the activities against the identified criteria. It is conducted in line with the Australian Standard of Assurance Engagement ASAE 3500 *Performance Engagements*. We complied with the independence and other ethical requirements for assurance engagements.

**Acknowledgements**

The review team for this report was Salv Bianco, Iolanda Telford, Kris Slaytor, Sharon Ryan, Sue Forder and Nicholas Pidd.

We appreciate the cooperation and assistance given by staff of the City of Tea Tree Gully and the Eastern Health Authority during our review.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Andrew Blaskett'.

Andrew Blaskett  
**Auditor-General**



# Contents

<b>Audit snapshot</b>	<b>1</b>
<b>1 Introduction</b>	<b>3</b>
<b>2 Key insights on managing food safety for councils</b>	<b>4</b>
<b>3 Managing food safety by local government</b>	<b>5</b>
3.1 Local government roles and responsibilities	5
3.2 Food safety management fees	5
3.3 Challenges for councils in managing food safety	6
3.4 Overview of food safety management activities we reviewed	6
<b>4 Eastern Health Authority</b>	<b>11</b>
4.1 Executive summary	11
4.2 Overview of the Eastern Health Authority	12
4.3 Governance arrangements findings	15
4.4 Food safety inspection findings	21
4.5 What the Eastern Health Authority did well	22
<b>5 City of Tea Tree Gully</b>	<b>24</b>
5.1 Executive summary	24
5.2 Overview of the City of Tea Tree Gully	25
5.3 Governance arrangements findings	29
5.4 What the City of Tea Tree Gully did well	32
<b>Appendices</b>	
<b>Appendix 1 – Audit mandate, objective and scope</b>	<b>33</b>
<b>Appendix 2 – Food safety framework in South Australia</b>	<b>35</b>
<b>Appendix 3 – City of Tea Tree Gully’s food safety inspection and audit processes</b>	<b>36</b>
<b>Appendix 4 – Food business risk classification</b>	<b>38</b>
<b>Appendix 5 – Response from Eastern Health Authority</b>	<b>40</b>
<b>Appendix 6 – Response from City of Tea Tree Gully</b>	<b>41</b>
<b>Appendix 7 – Abbreviations and terms used in this report</b>	<b>42</b>
<b>Annexure</b>	<b>44</b>
<b>References</b>	<b>45</b>



## Audit snapshot

### Managing food safety in council areas – Local government

#### What we reviewed and why

Food safety is vital to protecting public health and wellbeing. Strong regulatory systems and effective enforcement help to prevent illnesses, hospitalisations and deaths resulting from foodborne diseases.

In South Australia, food safety is managed by both the Department for Health and Wellbeing and local government. They work together to administer and enforce the *Food Act 2001* and the Australia New Zealand Food Standards Code.

We reviewed selected state and local government activities to assess whether food safety is effectively managed in council areas. We looked at how the Eastern Health Authority and the City of Tea Tree Gully maintain effective regulatory and other activities that enable food businesses to provide safe and suitable food to the community.

This is one of two reports. The other report looks at how the Department for Health and Wellbeing oversees and supports councils in managing food safety.

#### What we concluded

The Eastern Health Authority and the City of Tea Tree Gully had a range of effective food safety management activities that enable food businesses to provide safe and suitable food to the community. Key activities included conducting systematic, risk-based inspections and audits of food businesses, and performing comprehensive and timely complaint investigations.

We identified some areas where the Eastern Health Authority and the City of Tea Tree Gully needed to improve the effectiveness of their governance arrangements, such as evaluating and reporting on their performance against set performance indicators.

#### Key facts

At 30 June 2025	Eastern Health Authority	City of Tea Tree Gully
Food businesses operated within the area	1,338	710
Percentage of high- and medium-risk food businesses within the area	68%	70%
Costs recovered from food safety management fees	24%	20%



Government  
of South Australia

Audit Office of South Australia



# 1 Introduction

Food safety is vital to protecting public health and wellbeing. Foodborne illness is estimated to cost the Australian economy around \$3 billion each year.<sup>1</sup> Across Australia, there are about 4.7 million cases of food poisoning, resulting in about 47,900 hospitalisations and 38 deaths each year.<sup>2</sup> Strong regulatory systems and effective enforcement of food safety standards help to reduce food-related illnesses, hospitalisations and deaths.

---

*The Food Act 2001 defines a food business as a business, enterprise or activity (excluding primary food production) that handles food intended for sale or sells food regardless of whether it operates on a commercial, charitable or community basis, or on a single occasion.*

---

In South Australia, food safety is managed by both the Department for Health and Wellbeing (the Department) and local government. They work together to check that food businesses comply with the national food standards to:

- minimise the risk of harmful contaminants in the food they serve and we eat
- ensure food for sale is safely prepared and is suitable for our consumption.

See Appendix 2 for information about the food safety framework in South Australia.

We reviewed the Eastern Health Authority and the City of Tea Tree Gully to assess whether they had effective regulatory and other activities that enable food businesses to provide safe and suitable food to the community. See sections 4 and 5 for the respective review conclusion, findings and recommendations.

We also reviewed the Department's activities that oversee and support councils in managing food safety in their council areas. This is reported separately in *Part A: Department for Health and Wellbeing*.<sup>a</sup>

Our audit mandate, review objective, criteria and scope are provided in Appendix 1.

---

<sup>a</sup> Auditor-General's Report 2 of 2026 *Managing food safety in council areas, Part A: Department for Health and Wellbeing*.

## 2 Key insights on managing food safety for councils

Councils are responsible for enforcing parts of the *Food Act 2001* (the Food Act) in their council areas. Our review revealed insights that all councils should consider when reviewing their own practices, including:

- developing food safety management plans with clear objectives and strategies to achieve legislative compliance and strengthen food safety practices
- setting SMART performance measures and regularly evaluating and reporting on food safety management performance against these measures
- identifying, assessing and managing risks associated with food safety management
- using business risk classifications, compliance history and complaint trend analysis to plan and prioritise inspections and allocate resources efficiently
- maintaining adequate records to document the outcomes of inspections and audits, follow-up actions, changes in risk classifications and complaint investigations
- documenting policies and procedures that outline the roles, responsibilities and processes for consistent food safety inspections, audits and complaints management practices
- implementing strategies to educate food business owners and food handling staff to achieve and maintain high standards of food safety, including:
  - targeted education programs and initiatives that address the specific needs of food businesses to ensure that they fully understand and can achieve food safety legislative requirements
  - accessible guidance materials, such as fact sheets and checklists, written in multiple languages to help food businesses understand their food safety responsibilities.

See the case studies in sections 3.4.1 and 3.4.2 for more insights.

## 3 Managing food safety by local government

### 3.1 Local government roles and responsibilities

---

Councils are responsible for managing food safety in their council area, including:

- inspecting food business premises to check they meet the requirements of the food safety standards
- ensuring food businesses serving vulnerable people in their council area are audited when they are due
- investigating complaints from the public about food businesses
- managing minor foodborne illness outbreaks and helping the Department investigate major outbreaks
- ensuring food recalled for health and safety reasons is removed from sale
- receiving notifications from food businesses about their operations.

Environmental health officers (EHOs) are authorised to perform these activities for councils. Some of their broader responsibilities are educating businesses about food safety standards and helping them comply with these rules.

The Department conducts food safety audits of public hospitals, SA Health businesses and not-for-profit organisations that provide meals to vulnerable people. The council where the food business is located remains the enforcement agency.

The Department is also responsible for the safety and suitability of food sold and monitoring the enforcement of compliance with food safety standards in unincorporated areas of South Australia.

### 3.2 Food safety management fees

---

Councils can charge the following fees to help cover the cost of managing food safety in their area:

- inspection fees set in line with the Food Act
- audit fees determined by the council employing the food safety auditor
- expiation fees for offences set under the Food Act.

#### 3.2.1 Food safety inspection fees

The maximum inspection fees that can be charged by local government for food inspections are prescribed by the SA Government under the Food Act. In 2024-25 the maximum food inspection fee for small food businesses (employing up to 20 FTE food handling staff) was \$144. The maximum fee for other food businesses was \$361.

### 3.2.2 Food safety audit fees

Councils may set fees to recover the costs of performing food safety audits for the food businesses that engage them. Audit fees may vary according to the nature of the food business being audited (for example, private hospital, aged care facility or childcare centre), and travel costs incurred. Audit fees can be set at an hourly rate or fixed-fee basis.

See sections 4.2.3 and 5.2.4 for more information about the food safety management costs for the two publicly funded bodies we reviewed.

## 3.3 Challenges for councils in managing food safety

---

Councils face many challenges in managing food safety, including:

- shortages in qualified and experienced EHOs
- food businesses failing to notify them of their business details before starting their operations and changes to those details
- increasing diversity and complexity in the types of food businesses, such as mobile and home-based food operators
- increasing workload to support more food businesses owned and operated by people where English is a second language and cultural food safety practices differ
- assessing a food business's compliance with the requirements for food allergen management
- managing and coordinating responsibilities shared with the Department
- working with complex and changing food safety laws, leading to an increase in EHOs' workloads where inspections take longer to complete, extra follow-up visits are needed and there are more administrative tasks<sup>3</sup>
- information sourced from the local government bodies detailed in this report show that the fees cover only a small fraction of the cost of their food safety services, with the balance funded from general income.

## 3.4 Overview of food safety management activities we reviewed

---

### 3.4.1 Food safety inspections

EHOs are employed by councils to perform food safety inspections in their area to ensure food businesses comply with legislative requirements, including the food safety standards. EHOs assess the food business's hygiene, safe food handling and storage practices, temperature control and the condition of equipment and facilities. Inspections are mostly unannounced at a frequency based on the South Australian food business risk classification. See Appendix 4 for information about these risk classifications.

In 2024-25, there were more than 18,000 food businesses operating in South Australia. In this time, councils performed nearly 10,000 routine inspections and more than 2,700 follow-up inspections. Most food safety inspections were for high-risk food businesses (85%).<sup>4</sup> Case study 1 shows the Eastern Health Authority's inspection process that led to an immediate closure of a food business.

## Case study 1: Immediate closure of a food business due to serious public health risk

### Background

An EHO conducted an unannounced food safety inspection of a food business. The owner advised the EHO that the business was being sold and would stay open for one more week. After discussions with a senior EHO, the inspection continued to ensure the food business met food safety requirements until it closed.

### Inspection findings

The EHO found several breaches of the food safety standards, including:

- no soap or paper towels at handwashing stations, preventing proper hand hygiene
- the handwashing basin was used for washing dishes, increasing the risk of cross-contamination
- poor staff hand hygiene practices, such as not washing their hands after using mobile phones
- expired food items, including dairy products past their use-by dates, posing foodborne illness risks
- incorrect food storage practices, such as storing raw prawns next to ready-to-eat fruit, increasing the risk of cross-contamination
- no pest control records, raising concerns about unchecked infestations
- inadequate cleaning practices, with grease build-up and unclean food contact surfaces that may harbour harmful bacteria.

### Escalation

Due to the number and severity of breaches, a senior EHO attended the site to assess whether the business could continue operating safely. The senior EHO identified more high-risk non-compliances, including:

- rodent droppings under food shelves, increasing the risk of salmonella
- sanitising chemicals not properly diluted, reducing their effectiveness
- food stored at unsafe temperatures, including cooked pasta left unrefrigerated for several hours, increasing the risk of bacteria growth.

The EHOs gave practical advice to address each breach, including showing the business owner the correct handwashing techniques, safe food storage arrangements and proper chemical dilution.

### Enforcement action

The EHOs determined that the extent of the non-compliances posed an immediate and serious public health risk. Given the food business had upcoming bookings, continuing to operate could expose customers to unsafe food. After consulting the Eastern Health Authority's Chief Executive Officer, the EHOs requested that the business owner close the business immediately until these issues were resolved. The owner was reluctant to close voluntarily.

An emergency notice under the *South Australian Public Health Act 2011* was verbally issued onsite, allowing immediate action to address public health risks efficiently and ensure legal compliance until closure and protect the community. The emergency notice was effective for 72 hours to allow the EHO to return to the office to prepare and issue the prohibition order under the *Food Act 2001*.

### Key insights

Ongoing risk assessment during food safety inspections allows EHOs to identify and prioritise the most serious risks and take immediate actions to prevent them from worsening.

Involving senior EHOs early in inspections supports faster decisions and actions to address complex or high-risk cases.

Enforcement tools should be selected based on the urgency and severity of the public health risk, such as issuing an emergency notice, to provide an effective option where immediate action is needed.

## 3.4.2 Food safety audits

Food businesses that serve vulnerable people must have food safety programs and are audited by an approved food safety auditor. These audits are planned, systematic and comprehensive to verify a business has:

- complied with its food safety program and the food safety standards
- addressed identified hazards with appropriate controls.

In 2024-25, local government food safety auditors conducted 642 audits.<sup>b</sup> The numbers of food businesses for each type of facility were:

- 231 aged care facilities
- 395 childcare centres
- 16 private hospitals.<sup>5</sup>

See Appendix 3 for information about the food safety audit process.

Case study 2 shows the City of Tea Tree Gully's approach to ensuring food safety audits are conducted when they are due.

### Case study 2: City of Tea Tree Gully's approach to ensure food safety audits are done when they are due

The Council's target for audit completion is within one month of the due date. Audit due dates are recorded in the Council's Health Manager database.

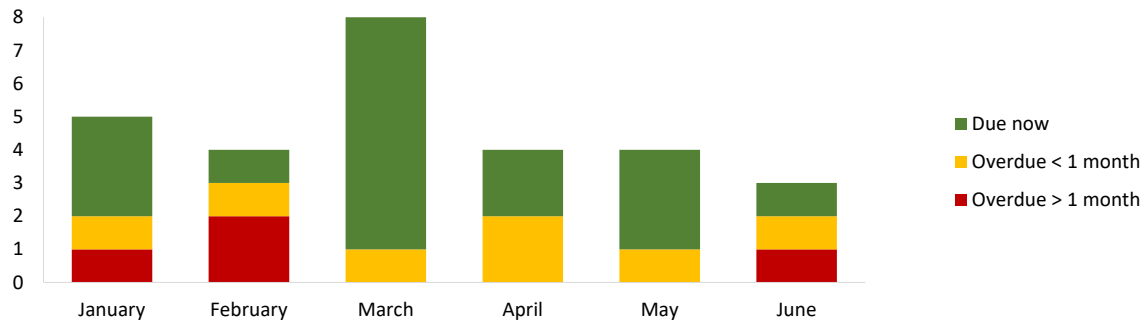
#### Monitoring performance

The team leader created a dashboard to show the number of food safety audits that are due and overdue each month, even if the Council is not responsible for the audit.

---

<sup>b</sup> Some facilities were audited more than once during the financial year.

The chart below is an extract from the dashboard.



Notes: All audits overdue more than one month relate to auditors external to the Council. Information provided by the Council. We did not audit this data.

Audits exceeding the Council’s target are shown as red and remain so until it is completed. The dashboard is reviewed by the team leader each month to identify and schedule overdue audits, identify any that were missed and obtain the relevant audit report to update the Health Manager database. This allows the Council to comply with regulatory requirements, maintain quality standards and reduce food safety risks.

### Reporting performance

The team leader uses the information from the dashboard to report to management on the timeliness of food safety audits.

### Key insights

A single, reliable data source is critical, as performance monitoring depends on the quality of the underlying data.

Regular, routine reviews improve the timeliness of audits and reduce risk by preventing them from becoming overdue and high risk.

Councils remain accountable for oversight, even when audits are not performed by their auditors.

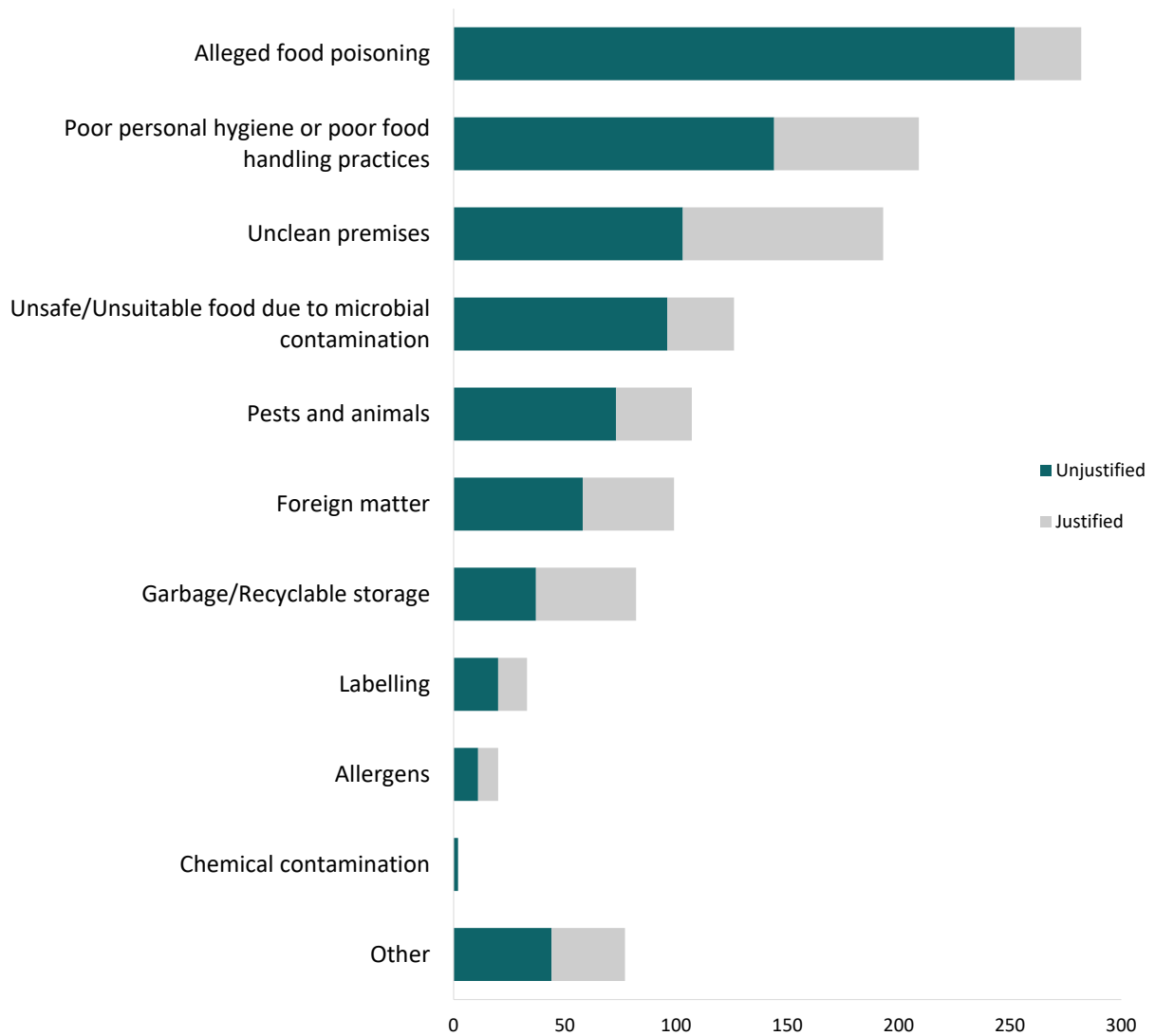
Visual reporting highlights performance issues quickly, allowing managers and decision makers to clearly understand the risks, results and performance issues.

The dashboard allows the team leader to easily demonstrate performance against the Council’s targets.

## 3.4.3 Investigating food complaints

Councils manage food safety by investigating complaints made by the public about food-related illness or the unsafe practices of food businesses. Figure 3.1 shows the number and type of complaints received by councils in 2024-25. It shows how many of these complaints were found to be justified by EHOs when investigated by them.

**Figure 3.1: Food complaints received by councils in 2024-25**



Source: Department for Health and Wellbeing Annual Report 2024-25 Appendix 1 *Local government activities under the Food Act 2001 2024-25*, page 60. We did not audit this data.

As shown, most food complaints were about alleged food poisoning, poor personal hygiene or food handling practices and unclean premises. EHOs found that only a third of these complaints were justified as food safety concerns.

## 4 Eastern Health Authority

### 4.1 Executive summary

---

#### What we concluded

We assessed whether the Eastern Health Authority (the Authority) has effective regulatory and other activities that enable food businesses to provide safe and suitable food to the community.

We concluded that the Authority had a range of effective food safety management activities, including:

- implementing a food safety management plan that aligns with its food safety objectives and outcomes
- systematic, risk-based inspections of food businesses
- comprehensive and timely complaint investigations
- audits of food businesses serving vulnerable people
- supporting food businesses to understand and comply with legislative requirements.

We found two areas where the Authority needs to improve the effectiveness of its governance arrangements by:

- reporting on its performance against set key performance indicators
- documenting its assessment of food safety management risks.

Addressing these areas would improve its oversight, accountability and continuous improvement in food safety management.

#### What we recommended

We recommended that the Authority should:

- evaluate and report on its food safety performance against its key performance indicators
- review its practices to identify and assess all its food safety management risks and document and report on these assessments as required by its policy.

#### Eastern Health Authority's response

The Authority accepted our findings and told us how it would action our recommendations. Its response to each recommendation is included in sections 4.3.2 to 4.4.1. The Authority's overall response to this report is in Appendix 5.

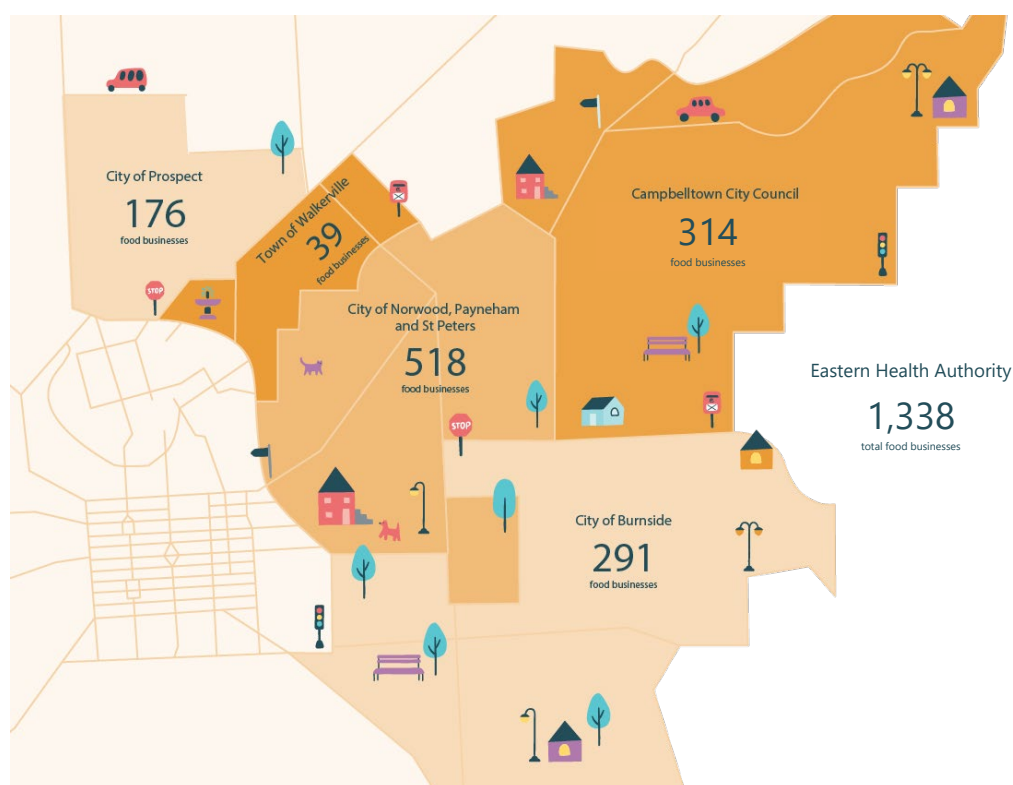
## 4.2 Overview of the Eastern Health Authority

### 4.2.1 About the Eastern Health Authority

The Authority is a regional subsidiary established under section 43 of the *Local Government Act 1999* to provide public and environmental health services mainly to and within its constituent council areas<sup>c</sup> (the Authority's area). Food safety regulation, immunisation programs, environmental health inspections and investigation of community concerns are some of the key services it delivers. These services aim to protect and promote public and environmental health in the community.

At 30 June 2025, there were 1,338 food businesses operating within the Authority's area, as shown in figure 4.1.

**Figure 4.1: The number of food businesses by council area**



### 4.2.2 Food safety activities

The Authority's role in managing food safety in its area includes:

- conducting inspections and audits for food businesses
- taking enforcement action when needed to ensure compliance with law
- responding to food enquiries, complaints and recalls
- educating food businesses about effective food safety practices.

<sup>c</sup> The Authority's constituent councils are the City of Norwood, Payneham and St Peters, City of Burnside, Campbelltown City Council, City of Prospect and The Corporation of the Town of Walkerville.

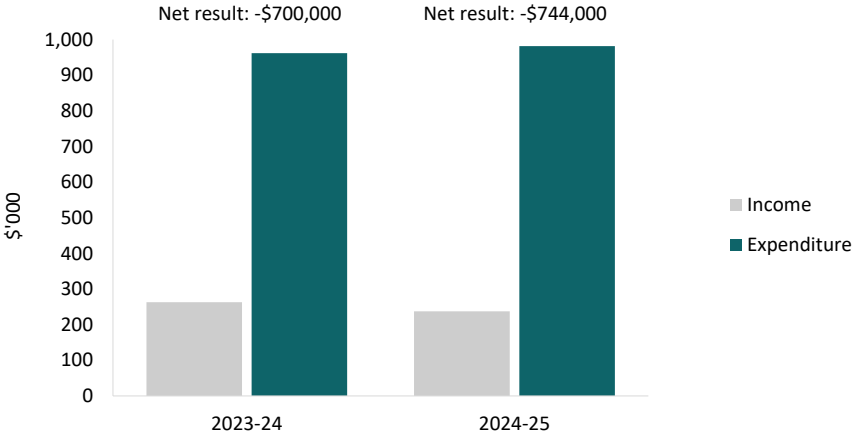
### 4.2.3 Food safety management fees

The Authority charges food businesses a fee to help cover the cost of performing inspections and audits. It can also charge expiation fees for offences under the Food Act. While the Authority has discretion over the fee that can be charged for audits, maximum fees for inspections and expiations are prescribed under the Food Act.

The Authority’s income from inspections, audits and expiation fees decreased from \$263,000 in 2023-24 to \$237,000 in 2024-25. This was mainly due to a temporary staff shortage leading to a decrease in the number of audits being performed.

Expenditure includes employee costs and administrative expenses in carrying out food safety management activities. It increased from \$962,000 to \$981,000 in 2024-25, due to the write-off of expiation and inspection fees that could not be collected from food businesses over several years. As a result, income from these fees covered 27% of costs in 2023-24 and 24% in 2024-25 with the shortfall covered by the constituent councils’ contributions. The Authority’s net result is shown in figure 4.2.

**Figure 4.2: Income and expenditure for food safety management**



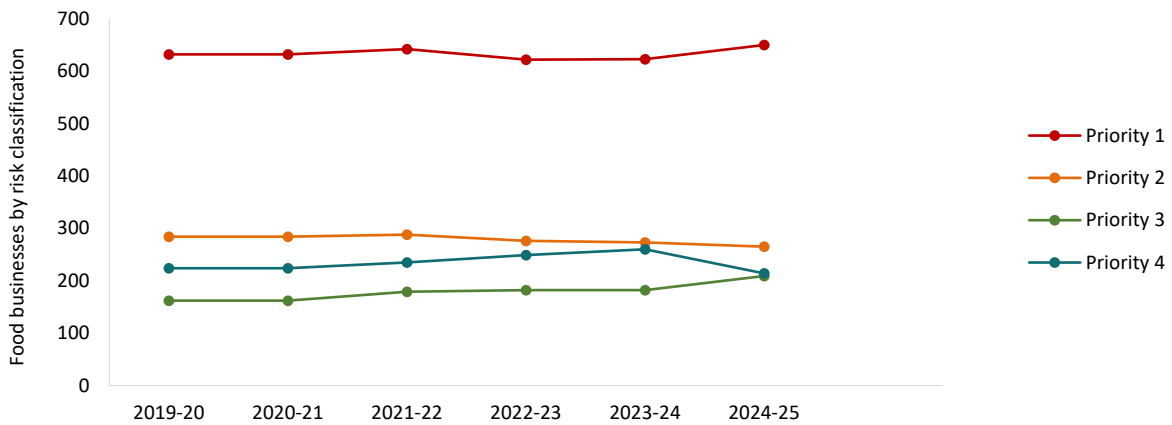
Source: Based on data from the Eastern Health Authority. We did not audit this data.

### 4.2.4 Food businesses by risk classification

There were 1,338 food businesses operating within the Authority’s area at 30 June 2025. 49% of these food businesses were classified as the highest risk (P1) in 2024-25, as shown in figure 4.3. The total number of food businesses remained consistent over the five years to 2024-25. The number of lowest risk (P4)<sup>d</sup> businesses reduced from 260 to 214 in 2024-25, because the businesses either closed or stopped selling food.

<sup>d</sup> P4 food businesses only have re-inspections relating to complaints, recalls or risk changes.

**Figure 4.3: Food businesses by risk classification in the Authority's area**



Source: Based on data from Eastern Health Authority's annual reports. We did not audit this data.

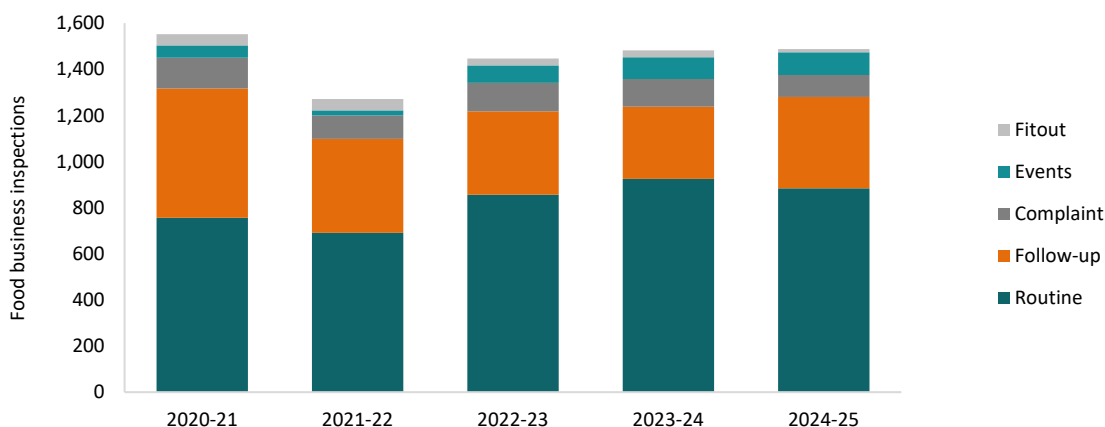
See Appendix 4 for more information about the risk classifications of food businesses.

### 4.2.5 Food safety inspections

The Authority performs food safety inspections to ensure food businesses comply with food standards.

Routine and follow-up inspections made up 86% of the total in 2024-25, as shown in figure 4.4. The total number of inspections decreased by 64 over the five years mainly due to fewer follow-up, fitout and complaint inspections, while routine and event inspections increased. The largest decrease was in 2021-22 due to the impact of the COVID-19 pandemic on resources.

**Figure 4.4: Total food business inspections**



Source: Based on data from Eastern Health Authority's annual reports. We did not audit this data.

### 4.2.6 Food safety audits

Food businesses are responsible for engaging their own food safety auditors. These audits help ensure that businesses serving vulnerable people comply with food safety standards. Figure 4.5 shows the number of audits of food businesses in its area over the five years to 2024-25.

Figure 4.5: Audits of food businesses within the Authority's area



Source: Based on data from the Eastern Health Authority's Food Act 2001 – Annual Report Questionnaire. We did not audit this data.

## 4.2.7 Food safety initiatives

The Authority has implemented food safety initiatives to support food businesses in maintaining food safety standards. These include:

- offering complimentary pre-opening inspections to new food businesses and, if requested in advance, reviewing design plans to help ensure premises' structure and fitout meets food safety standards
- providing a welcome pack to new food businesses, which outlines the legal requirements, food safety practices, fitout standards and information and staff training on hygiene, temperature control and cleaning requirements for home or temporary businesses. It includes self-assessment checklists, fact sheets and the Authority's contact details
- making food safety resources available to food businesses and the community through the Authority's website, including educational videos, fact sheets and a biannual food safety newsletter, supported by social media messaging
- offering regular and free food safety fundamentals training to food businesses in its area, combining theory and interactive activities designed to improve food handling practices.

## 4.3 Governance arrangements findings

---

### 4.3.1 Background

The Authority's *Towards 2033* strategic plan outlines its vision, mission and priorities, including a key priority to strengthen food safety practices across its region. The strategic plan informs the objectives, priorities and key performance indicators (KPIs) set out in its annual business plan and budget. The Authority monitors and reports on the progress of the annual business plan, priorities and outcomes to the Board and its constituent councils. The Authority's integrated planning and reporting framework is shown in figure 4.6.

**Figure 4.6: The Authority’s integrated planning and reporting framework**



Source: Based on information provided by the Authority.

### 4.3.2 The Authority had not evaluated its performance against its key performance indicators

#### Recommendation

The Authority should evaluate and report on its food safety performance against established KPIs, including a clear and systematic comparison of actual outcomes to the specific KPIs set out in the business plan.

#### Finding

The Authority's Charter requires it to prepare an annual business plan that supports and informs its annual budget and includes specific performance targets. The Charter also requires the Authority's Board to review whether the business plan has been achieved against these targets at least once every financial year.

To support this oversight, management provides the following reports to the Board:

- An environmental health activity report, which summarises food safety activities such as the number of food inspections and audits performed, the nature and total number of non-compliance with food safety standards, enforcement actions and food complaints.
- An annual business plan review report, which includes the results of food safety activities against the relevant strategic objectives, such as the total number of routine inspections, food complaints and educational activities.

While these reports explain the Authority's food safety activities for the reporting period, they do not show how the Authority is performing against the set KPIs.

Figure 4.7 is an example of how performance against the KPIs can be reported. This approach differentiates between activities and outcomes, identifies performance gaps and supports informed and timely decision-making. It also highlights areas where targets are not being met. This allows the Board to identify trends, allocate resources more efficiently and make decisions to improve service delivery and public health outcomes.

**Figure 4.7: Performance reporting examples**

KPI	Example 1			
	Target	Actual	Status	Notes
Inspect at least 90% of high-risk food businesses every 12 months	≥90%	95%	✓	Met target, strong performance
Resolve 90% of complaints within 10 business days of complaint received	90%	88%	⚠	Slightly below target

### Example 2

KPI	Target	Complaints received	Resolved within 10 days	% resolved within 10 days	Status
Resolve 90% of complaints within 10 business days of complaint received	90%	45	41	91%	✓ on track

By effectively evaluating and reporting performance against KPIs, the Authority can:

- clearly identify underperformance and inform timely and evidence-based actions to improve results
- support effective governance and accountability by providing the Board and the constituent councils, with reliable performance information.

### Eastern Health Authority's response

*EHA acknowledges the importance of accurately measuring and reporting performance against its key performance indicators. While the annual business plan review report detailed the number of inspections conducted for high-risk food businesses, it did not include a calculation of performance against the relevant target, representing a reporting oversight.*

### 4.3.3 The Authority's key performance indicators were not specific, measurable and time-bound

#### Recommendation

The Authority should revise its KPIs to be more specific, measurable and time-bound to effectively assess the performance of its food safety activities against its objectives and outcomes.

### Finding

The Authority's food safety management strategy outlines strategic objectives, outcomes and KPIs aimed at strengthening food safety practices across its region. Although the Authority's KPIs provide a framework for measuring performance, they lack specific targets and measurable outcomes.

The KPIs could be improved by including the specificity, measurability and time-bound elements to allow more effective monitoring of achievement of food safety objectives and outcomes. See figure 4.8 for examples of how the current KPIs could be updated to make them more specific, measurable and time bound.

**Figure 4.8: Examples of changes to current KPIs**

Current KPIs	Revised KPIs
Meeting all food safety inspection requirements for higher-risk food businesses.	Routine inspections: Inspect at least 90% of high-risk food businesses every 12 months
Investigating all food safety complaints in accordance with EHA’s service standards and SA Health instructions.	Food safety complaints: Resolve 90% of complaints within 10 business days of complaint received
All new food businesses receive an EHA welcome pack following notification.	100% of new food businesses receive an EHA welcome pack within five business days of notification.

By making KPIs specific, measurable and time-bound, the Authority can:

- more accurately track progress and measure how well it is performing against its food safety objectives and outcomes
- clearly identify underperformance and take timely, evidence-based actions to improve results
- support effective governance by providing the Board and its constituent councils with reliable performance information, enabling management to demonstrate accountability and effectiveness
- support a culture of continuous improvement in food safety management.

#### Eastern Health Authority’s response

*EHA acknowledges that its KPIs were not sufficiently specific, measurable, or time-bound. In response, EHA has applied the KPI examples provided by the AOSA when developing revised KPIs for inclusion in the 2026/2027 Annual Business Plan, which is currently in draft form. These revised KPIs are intended to support clearer performance monitoring and reporting against EHA’s food safety and other public health protection objectives.*

#### 4.3.4 The Authority has not documented its food safety management risk assessments

##### Recommendation

The Authority should:

- review its practices to identify and assess its food safety management risks
- identify and evaluate the effectiveness of its current controls in reducing risks to an acceptable level
- record risk assessments and treatment plans that are needed to monitor and report on these risks
- report these risks as required by its policy.

## Finding

The Authority's risk and opportunity management policy and framework outline the key elements of a sound risk management process, including defined roles and responsibilities, processes and reporting requirements. Most importantly, management is responsible for implementing the framework, managing risks within their area of responsibility and documenting the risk assessments.

While the Authority advised us of the risks relating to its food safety management activities, its assessment of those risks was not documented in a risk register as required by its policy. This includes risks such as:

- failing to perform inspections and audits within required time frames
- food businesses failing to notify the Authority when they commence operations
- failing to respond to complaints promptly.

Without documented risk assessments, management cannot effectively demonstrate whether:

- risks have been adequately assessed and treated, and whether residual risk levels are acceptable to the Authority's Board
- current controls and other risk treatments are appropriate and operating effectively
- risks are reported to the Chief Executive Officer, audit committee and Board, as required by the Authority's policy.

## Eastern Health Authority's response

*EHA acknowledges that it has not documented a detailed food safety management risk assessment to the level identified by AOSA.*

*Enquiries with other Food Safety Enforcement Agencies (South Australian councils) have indicated that food safety management risks are generally assessed at a higher program level rather than through detailed, activity-specific risk assessments.*

*Notwithstanding this, EHA recognises the importance of clearly identifying, assessing, and documenting food safety management risks to support effective governance and reporting. Accordingly, EHA intends to progress the development of a more detailed food safety management risk assessment framework.*

*Given that food safety management risks are common across all South Australian Food Safety Enforcement Agencies, EHA will raise this matter with the Local Government Association of South Australia and Environmental Health Australia (SA) with the aim of supporting a sector-wide risk assessment of food safety management risks. In parallel, EHA will consider interim options for documenting and reporting food safety management risks in accordance with its risk management policy.*

## 4.4 Food safety inspection findings

---

### 4.4.1 The Authority did not have a food safety inspection policy and procedure

#### Recommendation

The Authority should develop and implement a food safety inspection policy and procedure to provide its staff with clear guidance to help ensure consistent inspection and record-keeping practices. It will also support compliance with the *Food Act 2001*, Food Safety Standards and SA Health requirements.

#### Finding

Policies and procedures are important for maintaining good governance and efficient practices. They should provide sufficient information to:

- guide staff in making decisions and overcoming problems efficiently
- support consistent practices and decision-making across the Authority to mitigate bias risk and promote confidence in the food safety activities
- provide a clear understanding of roles and responsibilities and accountability of the Authority and its staff.

While the Authority has several key policies and procedures, we found that these documents do not provide for:

- the use of standard checklists and documentation tools, including those required by SA Health
- when to issue food safety inspection and follow-up reports
- actions to be taken following non-compliance, such as issuing improvement notices when critical risks are identified
- guidance for time frames for follow-up inspections, such as when to consider the nature and number of non-conformances and the level of risk to the community
- record-keeping requirements to ensure consistency and transparency in processes
- internal reporting requirements to maintain accountability and compliance.

#### Eastern Health Authority's response

*EHA acknowledges that it does not currently have a standalone Food Safety Inspection Policy and Procedure.*

*EHA does, however, operate under a suite of governance instruments that support consistent and risk-based inspection activities, including:*

- *a food business inspection fee policy aligned with South Australian Food Business Risk Classification*
- *an enforcement policy guiding authorised officers on enforcement decision making standard operating procedures for the management of expiations.*

*EHA also promotes consistency and a measured approach through regular reviews at each team meeting between EHOs to discuss different elements of inspection practices and possible associated non-compliances. When matters are particularly obscure, EHOs consult one another in the first instance and seek further advice through SA Health and/or industry based Special Interest Groups as required. Officers are encouraged to use their professional judgement throughout the process.*

*While training is provided to new staff, and reviews of the current practices are consistently held, EHOs are expected and encouraged to exercise their professional judgement and autonomy in their food safety functions.*

*EHA recognises that the development of a consolidated Food Safety Inspection Policy and Procedure would strengthen clarity, consistency, and governance oversight.*

*Principle 4.18 of the Memorandum of Understanding between the Local Government Association and the Minister for Health under section 96 of the Food Act 2001 states that “enforcement agencies will strive for appropriate consistency and align compliance activities with relative food safety risk”.*

*EHA notes that enquiries with other South Australian Food Safety Enforcement Agencies did not identify any Food Inspection Policies addressing the gaps identified by the AOSA. To that end, EHA intends to raise this finding with the Local Government Association of South Australia, SA Health, and Environmental Health Australia (SA) and request that they support and facilitate the development of a Food Safety Inspection Policy and Procedure template that could be used on sector-wide basis.*

*In parallel, EHA will consider and implement interim measures to further document and support inspection consistency.*

## **4.5 What the Eastern Health Authority did well**

---

### **4.5.1 The Authority’s strategic management plans include food safety objectives and outcomes**

The Authority’s *Towards 2033* strategic plan incorporates food safety objectives that focus on strengthening food safety practices across its region. This, together with the annual business plan and budget, includes:

- food safety objectives and outcomes aimed at reducing foodborne illnesses and ensuring compliance with food safety standards and legislation
- resource allocation including staffing and budget considerations
- strategies for education, enforcement, and monitoring of food safety standards
- a risk-based approach for inspections based on business type and compliance history
- monitoring and maintaining a register of all food businesses, including mobile and home-based operations.

#### **4.5.2 The Authority provides clear and accurate information and guidance to food businesses about food safety**

The Authority provides clear and accurate information and guidance to support food businesses in understanding and meeting food safety requirements. This includes:

- providing guidance during routine inspections to help food businesses address issues and improve their food safety practices
- providing the inspection or audit reports to food businesses with clear feedback and actionable recommendations
- delivering tailored food safety training sessions and forums for different food business groups
- offering educational resources, such as fact sheets and instructional videos, with extra support for food businesses experiencing language barriers
- maintaining comprehensive online resources, including guidelines, fact sheets, training materials and newsletters, accessible to all food businesses.

#### **4.5.3 The Authority had effective food safety inspection activities**

Authorised EHOs perform risk-based food safety inspections for businesses in its constituent council areas. Inspections are documented and recorded, findings are reported to the food business and follow-up actions are taken when required.

See section 3.4.1 for a case study about how the Authority's inspection process led to the immediate closure of a food business due to a serious public health risk.

#### **4.5.4 The Authority had effective food safety audit activities**

The Authority performs audits of food businesses that serve vulnerable people at the food business's request. Auditors approved by SA Health perform these audits and ensure all records and results are reported in line with regulatory requirements.

#### **4.5.5 The Authority investigates food safety complaints timely**

The Authority has established processes for prioritising complaints, conducting investigations and resolving issues timely.

# 5 City of Tea Tree Gully

## 5.1 Executive summary

---

### What we concluded

We assessed whether the City of Tea Tree Gully (the Council) has effective regulatory and other activities that enable food businesses to provide safe and suitable food to the community.

We concluded that the Council had a range of effective food safety management activities in place, including:

- setting food safety targets and planning key regulatory activities
- documented policies and procedures for the complaint investigations and audits
- systematic risk-based inspections of food businesses
- auditing food businesses serving vulnerable people
- comprehensive and timely complaint investigations
- supporting food businesses to understand and comply with legislative requirements.

We found that the Council had not documented its assessment of all food safety management risks during the review period. In September 2025, while we were conducting our review, the Council's management updated the risk register for its assessment of these risks. As a result, it has addressed this finding.

We identified two other areas where the Council needs to improve the effectiveness of its governance arrangements by:

- providing clear direction on how its food safety performance will be monitored and reported, including the data needed to support the evaluation
- evaluating and reporting on its performance against set performance indicators.

Addressing these areas would improve the Council's oversight, accountability and continuous improvement in food safety management.

### What we recommended

We recommended that the Council should:

- update its documents to provide clear direction on monitoring and reporting on food safety performance, including the data required to support its evaluation
- regularly evaluate and report on its performance against all food safety performance indicators
- implement processes to collect relevant and accurate data and information to support the performance evaluation.

### City of Tea Tree Gully's response

The Council accepted our findings and told us how it would action our recommendations. Its response to each recommendation is included in section 5.3. The Council's overall response to this report is in Appendix 6.

## 5.2 Overview of the City of Tea Tree Gully

### 5.2.1 About the Council

The Council covers an area of around 95 km<sup>2</sup> in the outer north-eastern suburbs of Adelaide. On 30 June 2025, there were 710 food businesses operating within the Council’s area.

Food safety regulation is one of the many functions the Council delivers. Its strategic plan focuses on creating a thriving community with a quality lifestyle that values its people and natural environment.

### 5.2.2 The Council’s planning and reporting framework

The Council’s planning and reporting framework outlines its strategic direction and the arrangements for managing and reporting on its food safety activities, including inspections, audits and complaints. The framework is shown in figure 5.1.

**Figure 5.1: The Council’s planning and reporting framework**

<b>Corporate</b>	Customer experience strategy Enforcement policy	KPI for responses Graduated approach
<b>Regulatory Services Department</b>	Business plan	Food education initiative Food safety is business as usual
<b>Community Safety Division</b>	Community safety policy	Food safety priorities Target for timing inspections Target for timing audits Target for complaint response
<b>Environmental Health Team</b>	Food business inspection procedure Food safety audit procedure Annual work program Dashboards for timeliness Investigations of food complaints Issuing improvement notices Enforcement for non-compliance	Following up and reporting Reporting to SA Health Scheduling audits and inspections Performance reporting Response times Procedure for notices Graduated approach
<b>Databases</b>	Health Manager Content Manager	Recording inspections, audits and complaints Recording correspondence

Source: Based on information provided by the Council.

### 5.2.3 Food safety activities

The environmental health team’s role in managing food safety in the council area includes:

- conducting inspections and audits of food businesses
- taking enforcement action when needed to ensure compliance with law
- responding to food enquiries, complaints and recalls
- educating food businesses about effective food safety practices.

### 5.2.4 Food safety management fees

The Council charges food businesses a fee to help cover the cost of performing inspections and audits. It can also charge expiation fees for offences under the Food Act. While the Council has discretion over the fee that can be charged for audits, maximum fees for inspections and expiations are prescribed under the Food Act.

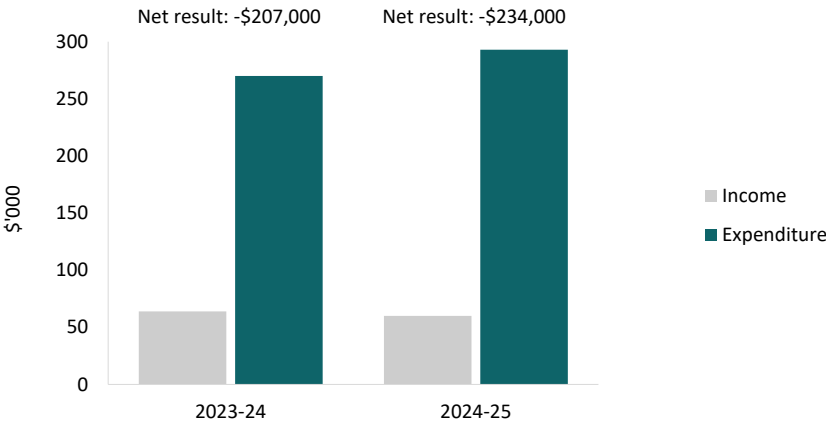
The Council’s income from inspections, audits and expiation fees decreased from \$64,000 to \$59,000 in 2024-25, mainly due to:

- lower fee revenue resulting from a reduction in routine inspections
- fewer audits of food businesses located outside of the Council’s area, which are charged at a higher rate to cover additional costs such as travel.

Expenditure on food safety management activities, which comprises employee costs and other administrative expenses, increased from \$270,000 to \$293,000 in 2024-25. This was mainly due to increases in employee costs.

As a result, income from these fees covered 24% of its costs in 2023-24 and 20% of its costs in 2024-25, with the shortfall covered by other sources of Council income. The Council’s net result is shown in figure 5.2.

**Figure 5.2: The Council’s income and expenditure for food safety management**

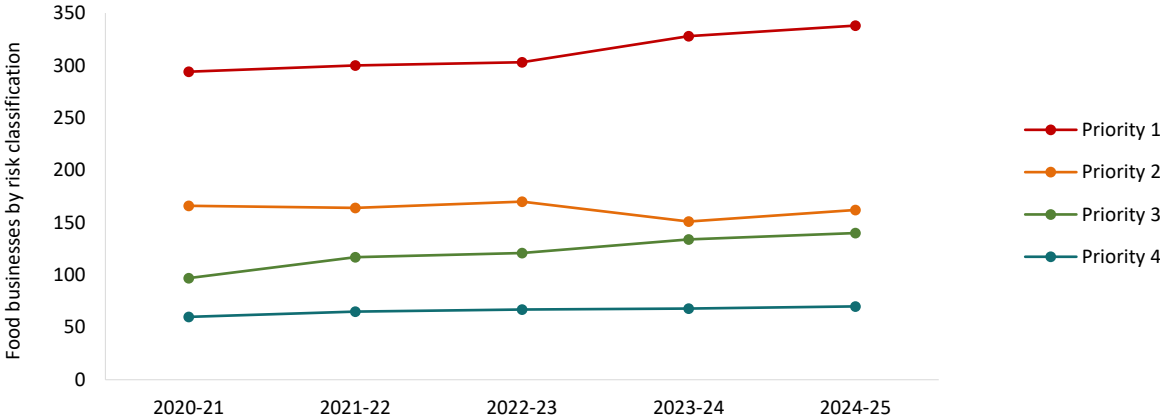


Source: Based on data provided by the Council. We did not audit this data.

### 5.2.5 Food businesses by risk classification

There were 710 food businesses operating in the Council’s area at 30 June 2025. 45% of these food businesses were classified as the highest risk (P1) in 2024-25, as shown in figure 5.3.

**Figure 5.3: Risk classification of food businesses in the Council area**



Source: Based on data from the Council’s annual food reports. We did not audit this data.

Figure 5.3 shows that the number of P1 food businesses increased from 294 in 2020-21 to 338 in 2024-25 (15%). The largest increase occurred in 2023-24 when it rose by 8%. Medium- to high-risk (P2) food businesses decreased from 170 to 151 (12%) in 2023-24, partly due to the reclassification of food businesses as higher risk. Medium- to low-risk (P3) food businesses increased by 31% over the five-year period.

See Appendix 4 for more information about the risk classification of food businesses.

### 5.2.6 Food safety inspections

The Council performs food safety inspections to ensure food businesses comply with food standards. Routine and follow-up inspections make up over 90% of the total in 2024-25, as shown in figure 5.4.

**Figure 5.4: The Council’s total food business inspections**



Source: Based on data from the Council’s annual food reports. We did not audit this data.

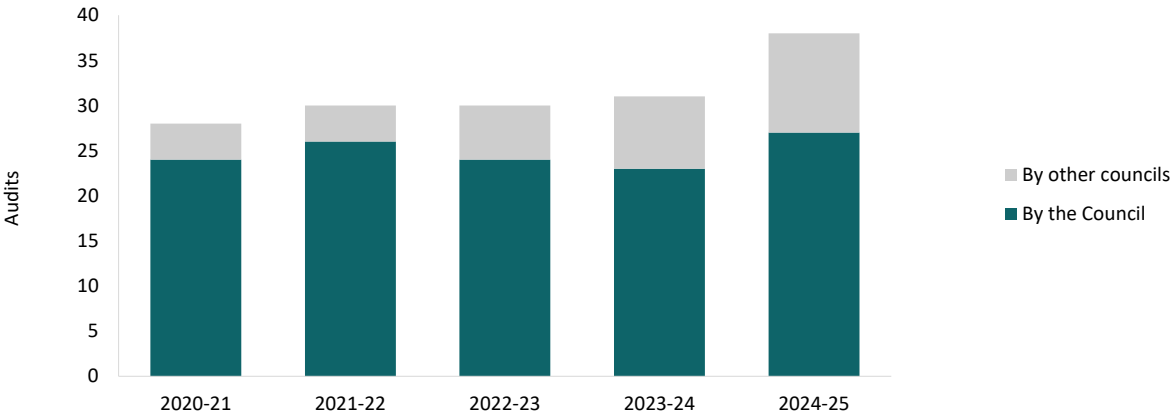
The number of routine inspections varies annually due to the differing inspection intervals for some food businesses. The number of complaints and follow-up inspections also varies with:

- inspections relating to complaints increased by almost 60% in 2024-25
- follow-up inspections increased by over 40% in 2024-25.

### 5.2.7 Food safety audits

Food safety audits help ensure that businesses serving vulnerable people comply with food safety standards. Audits of food businesses serving private hospitals, aged care facilities and childcare centres increased by 28% over the five years to 2024-25. Figure 5.5 shows the distribution of these audits performed by the Council and by food safety auditors from other councils. It shows that, while the number of audits the Council performed slightly increased between 2021-22 and 2024-25, these audits made up a smaller proportion of all audits performed across its area (73% in 2024-25 compared with 83% in 2020-21).

**Figure 5.5: Audits of food business in the Council's area**



Source: Based on data from the Council's annual food report. We did not audit this data.

The Council advised us that this reflects an increase in childcare centres in the area, and a decrease in audits of aged care facilities as most aged care providers choose to engage a single food safety auditor to audit all their facilities across multiple council areas.

### 5.2.8 Food safety initiatives

The Council has implemented food safety initiatives to support food businesses in maintaining food safety standards. These include:

- conducting inspections at the fitout stage and reviewing design plans
- giving tailored information to new food businesses when they start operating
- providing online information with detailed food safety requirements
- sending information to food businesses about new food safety requirements, such as allergen management and new food safety standards.

## 5.3 Governance arrangements findings

---

### 5.3.1 The Council had not documented how it will monitor and report on performing its food safety activities

#### Recommendation

The Council should update its documents to provide clear direction on monitoring and reporting its food safety performance, and the data required to support its evaluation.

#### Finding

The Council's planning and reporting framework for food safety management is embedded across several documents. We found that, while these documents outline the food safety strategy, such as the objectives, strategies and outcomes, they do not specify the performance monitoring and reporting requirements and the information and data needed to support the performance assessment.

Documenting these requirements helps staff assess the performance of food safety activities and confirm that strategies are effective and objectives are met.

#### City of Tea Tree Gully's response

*Council acknowledges the requirement to update documentation to ensure staff have a clear direction on the requirements, information and data need to support performance monitoring and reporting.*

*Council has committed to develop a framework to document to all food safety objectives, strategies, outcomes, and performance monitoring and reporting requirements.*

### 5.3.2 The Council did not evaluate the performance of some of its food safety activities

#### Recommendation

The Council should regularly evaluate and report on performance against all of its food safety performance indicators.

The Council should implement processes to collect relevant and accurate data and information to support the performance evaluation.

## Finding

For food safety activities to be effective, inspections, audits and investigations into complaints and incidents must be conducted promptly and to a standard that ensures compliance with food laws.

The Council has established performance indicators to evaluate the effectiveness of its food safety management activities. We found that:

- the Council is not monitoring and reporting on all its performance against these indicators. For example, performance in responding to food safety complaints is not evaluated or reported
- the Council's monitoring and reporting is limited to identifying on-time and overdue inspections and audits
- certain data needed for performance reporting was not captured, such as the date the complaint investigation started.

By effectively evaluating and reporting performance against all performance indicators, the Council can:

- clearly identify underperformance and take timely, evidence-based actions to improve results
- support effective and accountable governance by providing reliable performance information to help manage risks.

## City of Tea Tree Gully's response

*Council acknowledges the need to regularly evaluate and report on its performance against all food safety performance indicators.*

*To address this, Council will implement improved processes to collect relevant and accurate data and information.*

*This will include providing clearer direction on how food safety performance will be monitored and reported, as well as strengthening evaluation and reporting against established performance indicators.*

*Council, with the assistance of its IT team, will update its systems to include mandatory fields for complaint investigations, specifically the "Date Investigation Started." This will enable measurement of "Time to Respond," rather than relying solely on "Time to Close."*

*In addition, Council will develop a performance dashboard to provide real-time monitoring of key performance indicators, including:*

- *percentage of complaints responded to within defined timeframes;*
- *percentage of high-risk inspections completed on time; and*
- *training completion rates for officers.*

*Automated alerts will also be implemented to notify the Team Leader when a complaint or inspection is approaching its due date, enabling proactive management rather than retrospective identification of overdue matters.*

### 5.3.3 The Council had not documented its assessment of some food safety risks during the review period

#### Finding

The risk register for the Council's Regulatory Services Department includes an assessment of the significant food safety risks, including non-compliance with legislation, failure to promptly respond to a foodborne outbreak and difficulties recruiting and retaining staff.

While the Council advised us of its food safety management risks, we found that the risk register did not include documented assessments of all food safety risks during the review period. These risks included:

- inadequate training of EHOs
- failure to respond to food safety complaints
- inconsistent enforcement approaches
- delayed inspections of high-risk food businesses
- misclassification of a food premises' risk level.

Without a documented risk assessment, the Council's management cannot effectively demonstrate that:

- risks were adequately identified, assessed and treated, and the residual risk levels are acceptable to the Council
- current controls and other risk treatments are appropriate and operating effectively
- risks are reported to the Council's executive management team in line with the Council's policy.

In September 2025, the Council updated its risk register to include these risk assessments. As a result, it has addressed this finding.

#### City of Tea Tree Gully's response

*During the course of AuditSA's review, Council's Regulatory Services' team updated its risk register in September 2025 to reflect a revised assessment of relevant risks.*

*Accordingly, Council considers that this matter has been addressed during the review process.*

## 5.4 What the City of Tea Tree Gully did well

---

### 5.4.1 The Council has policies and procedures for its food safety activities

The Council has policies and procedures that document its processes for conducting food safety inspections and audits, and for investigating food safety complaints and incidents.

### 5.4.2 The Council has effective food safety inspection activities

The Council performs risk-based food safety inspections for food businesses in its area. Authorised EHOs perform these inspections, records are maintained, findings are reported, and follow-up actions are taken when required. See Appendix 3 for the Council's food safety inspection process.

### 5.4.3 The Council has effective food safety audit activities

The Council performs audits of food businesses that serve vulnerable people at the food business's request. Auditors approved by SA Health perform these audits and ensure all records and results are reported in line with regulatory requirements. See Appendix 3 for the Council's food safety audit process.

### 5.4.4 The Council has investigated food safety complaints timely

The Council has processes for prioritising complaints, conducting investigations and resolving issues timely.

### 5.4.5 The Council provides clear and accurate information and guidance to food businesses about food safety

The Council provides clear and accurate information and guidance to support food businesses in understanding and meeting food safety requirements. This includes:

- providing guidance during routine inspections to help food businesses address issues and improve their food safety practices
- providing the inspection or audit reports to food businesses with clear feedback and actionable recommendations
- offering educational resources, such as fact sheets and instructional videos, with extra support for food businesses experiencing language barriers
- maintaining comprehensive online resources, including guidelines, information sheets, templates and training materials, accessible to all food businesses.

# Appendix 1 – Audit mandate, objective and scope

## Our mandate

The Auditor-General has authority to conduct this review under section 32(1)(c) of the *Public Finance and Audit Act 1987*. This section allows the Auditor-General to review the efficiency, economy and effectiveness of the activities of a publicly funded body, including councils and their subsidiaries.

This review is a reasonable assurance engagement where we conclude on the performance of an activity against the identified criteria. It is conducted in line with the Australian Standard on Assurance Engagement ASAE 3500 *Performance Engagements*.

## Our objective

The objective of our review was to assess whether the publicly funded body has effective regulatory and other activities that enable food businesses to provide safe and suitable food to the community.

Our review covered the period from 1 July 2023 to 30 June 2025.

## What we reviewed and how

We considered whether the publicly funded bodies we selected to review had:

- governance arrangements to achieve their food safety objectives and outcomes and manage the associated risks
- processes to effectively monitor compliance with food laws through food business inspections/audits and management of complaints.

We assessed whether the two publicly funded bodies we selected to review are effectively managing food safety against the criteria in figure A1.1.

**Figure A1.1: Performance audit sub-objectives and criteria**

Sub-objective 1: Is the publicly funded body effectively managing its food safety activities through its governance arrangements?

Criteria 1.1	The publicly funded body has a comprehensive food safety management strategy/plan or equivalent that will achieve its food safety objectives and outcomes
Criteria 1.2	The publicly funded body provides information to those charged with governance to oversee performance against its food safety outcomes or activity targets
Criteria 1.3	The publicly funded body has a clear framework for identifying, assessing, treating and managing risks and this was implemented for its food safety management risks

Sub-objective 2: Is the publicly funded body effectively monitoring and assessing compliance with food laws through its inspections, audits and investigation of complaints?	
Criteria 2.1	The publicly funded body conducts systematic risk-based food safety inspections and audits of food businesses in its area
Criteria 2.2	The publicly funded body is receiving, prioritising and investigating complaints/incidents in a timely manner using a risk-based approach
Sub-objective 3: Is the publicly funded body effectively assisting food businesses' understanding of food safety laws to encourage compliance and the supply of safe and suitable food in its area?	
Criteria 3.1	The publicly funded body has strategies/activities to help food businesses understand and comply with legislative requirements and responsibilities about food safety, including the importance of notifying the publicly funded body of its operations or changes in business details
Criteria 3.2	The publicly funded body provides clear, accurate information and guidance to food businesses about food safety that is readily available and accessible
Criteria 3.3	The publicly funded body designs educational activities based on the results of inspections, audits and investigations to prioritise areas of greatest risk

We reviewed documents in detail and held discussions with staff. We considered:

- legislative requirements, including the *Local Government Act 1999* and *Food Act 2001*
- chapter 3 of the *Australia New Zealand Food Standards Code* (food safety standards)
- the publicly funded body's food safety plan, management policies and procedures
- risk management processes based on ISO 31000:2018 *Risk management guidelines*
- the publicly funded body's risk management policies and procedures.

## What we did not review

Food safety involves a broad range of activities. The areas we did not review include:

- aspects of the Food Act and regulations about food labelling, food composition, food packaging and equipment
- the management of foodborne disease outbreaks, investigations and food recall processes
- audits of food businesses in the council area performed by the Department for Health and Wellbeing and others
- the accuracy and completeness of the publicly funded body's food business register
- risk management practices across all the publicly funded body's functions. We focused on risks relevant to food safety management activities
- the accuracy of financial data concerning the cost of providing food safety services.

# Appendix 2 – Food safety framework in South Australia

## A2.1 South Australian food safety framework

South Australia's food safety framework is based on a national framework. See Appendix 2 in *Part A: Department for Health and Wellbeing*<sup>e</sup> for more information about the framework.

The key components of the framework for local government are the:

- *Food Act 2001* (the Food Act)
- Food Regulations 2017
- Chapter 3 of the Australia New Zealand Food Standards Code (the Code).

## A2.2 *Food Act 2001* and Food Regulations 2017

The objectives of the Food Act are to:

- ensure that food for sale is safe and suitable for human consumption
- prevent misleading conduct in connection with the sale of food
- provide for the application of the Code in South Australia.

The Food Act contains provisions about the legal and administrative regulation of food in South Australia and prescribes offences and penalties for not complying with them.

Food safety regulation in South Australia is jointly administered by state and local governments. A memorandum of understanding was established in 2014 between the Minister for Health and Wellbeing and the Local Government Association of South Australia. It defines the roles and responsibilities of the Department, Local Government Association of South Australia and councils for the exercise of the functions under the Food Act.

The Food Regulations 2017 contain details about the administration of the Food Act and adopt the Code for use in South Australia.

## A2.3 Australia New Zealand Food Standards Code

All food that is sold, processed or handled for sale in Australia and New Zealand must comply with the Code. It outlines requirements to safeguard the public and ensure consumers have accurate information about their food.

Chapter 3 of the Code contains food safety standards that apply to all Australian food businesses with additional requirements for those serving food to vulnerable people. Local government monitors compliance with these standards by:

- regularly inspecting food businesses
- auditing food safety programs of high-risk food businesses (private hospitals, aged care facilities and childcare centres)
- investigating complaints from the public about food businesses
- responding to food safety incidents and investigations
- participating in national and local food sampling programs.

---

<sup>e</sup> Auditor-General's Report 2 of 2026 *Managing food safety in council areas, Part A: Department for Health and Wellbeing*.

# Appendix 3 – City of Tea Tree Gully’s food safety inspection and audit processes

## A3.1 Food safety inspection process

Figure A3.1: Food safety inspection process

<b>Schedule</b>	Each month inspections due are allocated to team members for scheduling. Priority is given to P1 businesses and ensuring no P1 or P2 businesses are more than 3 months overdue
<b>History</b>	History of previous inspections is accessed for any outstanding items and whether the food business is in scope for the stars rating scheme
<b>Attend</b>	A thorough inspection is carried out by observation, taking temperatures and asking questions that refer to Safe Food Australia, and Food Safety Standard of Practice. Notes and photos are taken. Any ownership change is noted. The risk rating and frequency going forward is considered
<b>Report</b>	A report is completed with any non-compliance recorded and corrective action required. This is sent to the food business and to SA Health if they are participating in food safety rating scheme
<b>Follow up</b>	If there are non-compliances detected, a follow-up inspection occurs on the date marked on the report. The outcomes are marked on the original report and signed and dated
<b>Recording and billing</b>	The outcomes and any further action taken are recorded in the health manager database and next inspection date is set. An invoice is raised for Council’s set fee. The email with the invoice and report is recorded
<b>Enforcement options</b>	
Where non-compliance is serious, repetitive or excessive, the following enforcement options are available:	
Warning    Improvement notice    Expiation notice    Prohibition order    Prosecution	

## A3.2 Food safety audit process

Food businesses that serve vulnerable people must have a food safety program that documents:

- the potential hazards that may reasonably be expected to occur based on examining its food handling operations
- control measures to manage those hazards and corrective actions if they fail
- how controls will be monitored
- record-keeping requirements and review processes.

These programs are audited by an approved food safety auditor. The food safety audits are planned, systematic and comprehensive and verify a business has:

- complied with its food safety program and food safety standards
- addressed identified hazards with appropriate controls.

While any approved food safety auditor can perform the audit, the council where the food is provided remains the enforcement agency, and it is responsible for:

- making sure audits are done on time
- evaluating the audit results
- promptly addressing serious food safety risks by taking necessary enforcement actions.

Figure A3.2 outlines the food safety audit process.

**Figure A3.2: Audit process for food businesses serving vulnerable people**

<b>Notification by Food business</b>	The food business notifies the relevant council’s EHO who sets the audit frequency
<b>Food safety program is created</b>	The food business develops its food safety program and appoints an approved food safety auditor
<b>Food safety program is audited</b>	The appointed auditor conducts the audit at the required frequency and the auditor’s report is provided to the relevant council and SA Health
<b>If non-compliance detected</b>	Where a critical non-compliance is identified, the auditor halts the audit
<b>Enforcement agency attends</b>	An EHO from the relevant council will make sure urgent action is taken to rectify the issue
<b>Audit is completed</b>	When the EHO is satisfied that the issue is rectified, the auditor will restart the audit, provide the audit report to relevant council and next audit due date is set

# Appendix 4 – Food business risk classification

Figure A4.1 shows the inspection frequency of food businesses in South Australia based on their risk classification. It shows inspection intervals range from three months to two years.

**Figure A4.1: Frequency of food businesses inspections in South Australia**

Classification	Inspection frequencies (every x months)		
	Starting	Maximum	Minimum
P1	6	3	12
P2	12	6	18
P3	18	12	24
P4	Initial inspection to confirm risk level Re-inspect on complaint, recall or risk change only		

Source: The South Australian Food Business Risk Classification, December 2023.

Risk ratings are determined by the potential risks food products pose to consumers and the sector the food business operates in. Figure A4.2 shows the types of food businesses by risk classification.

**Figure A4.2: Types of food businesses by risk classification**

**Priority 1 (P1) – Highest risk**  
 Inspection/audit frequency: every 3–12 months

Food businesses that serve vulnerable people. They include hospitals and healthcare food services, such as aged care kitchens, hospital kitchens, and childcare centre kitchens.

Food business that handle high-risk foods. They include:

- restaurants and takeaway outlets that prepare food from raw ingredients onsite and require holding prepared food before serving it, including cooling or keeping food hot or cold
- bakeries preparing potentially hazardous foods that contain dairy products like cream-filled cakes and custard-based items
- ready-to-eat meat processors
- businesses handling raw oyster
- business that prepare sushi
- caterers producing large volumes of high-risk food
- supermarket delicatessens that cook chicken.

Priority 2 (P2) – medium- to high-risk  
Inspection frequency: every 6–18 months

These businesses handle foods that support pathogen growth but involve lower vulnerability or less complex processes than P1 businesses. They include:

- restaurants and cafés that prepare food from raw ingredients through cooking or typically operate as cook-and-serve or make-and-serve establishments, with food intended for immediate consumption
- takeaway and fast-food outlets, such as delicatessens, fast-food outlets, juice bars and sandwich outlets.

Priority 3 (P3) – Medium- to low-risk  
Inspection frequency: every 12–24 months

Businesses handling mostly low-risk or moderately risky foods and have less complex processes. They include:

- supermarkets (general grocery sections)
- retailers selling shelf-stable packaged foods
- coffee shops with minimal food preparation
- bakeries producing non-hazardous products, such as bread and dry pastries.

Priority 4 (P4) – Lowest risk  
Inspection frequency: Complaint-based, recall-driven, or when risk changes

These businesses handle low-risk, non-hazardous pre-packaged foods only. They include:

- convenience stores selling pre-packaged foods only
- bottle shops and liquor stores
- newsagents selling confectionery
- retailers selling shelf-stable packaged snacks.

Source: The South Australian Food Business Risk Classification, December 2023.

# Appendix 5 – Response from Eastern Health Authority



101 Payneham Road,  
St Peters SA 5069

PO Box 275  
Stepney SA 5069

T 8132 3600  
eha@eha.sa.gov.au

www.eha.sa.gov.au  
ABN 52 535 526 438

Our Reference: D26/5270

24 April 2026

Mr Andrew Blaskett  
Auditor-General  
Audit Office of South Australia  
Level 9  
State Administration Centre  
200 Victoria Square  
Adelaide SA 5000

Dear Mr Blaskett

## **Review of Food Safety Management**

I am writing in response to your letter dated 21 April 2026 regarding the draft report to parliament on your Review of Food Safety Management in South Australia. I can advise that we have no further comments on the draft.

The review offers valuable independent assurance and practical recommendations to enhance our governance, risk management, and operations. These findings will help Eastern Health Authority (EHA) and the local government sector strengthen food safety systems and support commitments to community wellbeing.

The EHA Board of Management and Executive thank the Audit Office of South Australia for their collaborative and professional approach to the audit process.

Yours Sincerely

Peter Cornish

**Chair**  
**Eastern Health Authority**

# Appendix 6 – Response from City of Tea Tree Gully



**CITY OF TEA TREE GULLY** 571 Montague Rd, Modbury SA 5092  
T (08) 8397 7444 W [cttg.sa.gov.au](http://cttg.sa.gov.au) S [fb.com/teatreegullycouncil](https://fb.com/teatreegullycouncil) ABN 69 488 562 969

---

Andrew Blaskett  
Auditor-General  
Audit Office of South Australia  
Level 9, State Administration Office  
200 Victoria Square  
Adelaide SA 5000

28 April 2026  
Our ref: D26/29390

Email: [records@audit.sa.gov.au](mailto:records@audit.sa.gov.au)

Dear Mr Blaskett,

## **Review of Food Safety Management**

Thank you for providing Council with a copy of the final report to be submitted to Parliament in relation to the review of food safety management.

This letter responds to the findings and recommendations of the Audit Office of South Australia and acknowledges that the Parliamentary report will be finalised by Audit SA. The report provides valuable insight into both the strengths of Council's existing food safety management practices and the areas where further improvement can be achieved.

Council welcomes the opportunity to comment and confirms that it has no additional responses beyond those previously provided.

Council is committed to implementing the actions outlined in the report to address the recommendations and strengthen controls associated with food safety activities. Of the three (3) recommendations identified, one (1) has already been implemented and the remaining two (2) have been accepted.

Council remains committed to continuous improvement in this area and will be guided by the report's recommendations to further strengthen its policies, systems and practices going forward.

Yours sincerely



Ryan McMahon  
**Chief Executive Officer**

## Appendix 7 – Abbreviations and terms used in this report

Abbreviation/Term	Description
Authority/EHA	Eastern Health Authority
Code	The Australia New Zealand Food Standards Code. This sets out the food standards. This report focuses on chapter 3, which contains the food safety standards enforced by councils and the Department in South Australia.
Council	City of Tea Tree Gully
Department	Department for Health and Wellbeing
EHO	An environmental health officer performs inspections as they have appropriate qualifications or experience. They are employees of the council or the Department.
Enforcement agency	Each council in South Australia is responsible for enforcing food safety laws in their areas. This includes food safety audits that others perform. The Department enforces food laws in the unincorporated areas of South Australia.
Food Act	<i>Food Act 2001</i>
Food business	A business, enterprise or activity (excluding primary food production) that handles food intended for sale or sells food, regardless of whether it operates on a commercial, charitable or community basis, or on a single occasion.
Food safety audit	An audit of a food business's food safety program and assessment of its compliance with the requirements of the food safety standards. Only food businesses that serve vulnerable people are audited. Other food businesses are inspected.
Food safety auditor	An EHO approved by the Department to perform food safety audits.
Food safety inspection	Is conducted by an EHO to assess compliance with the food safety standards for food businesses other than those serving vulnerable people.
Food safety program	This documents the potential hazards for a food business serving vulnerable people and the control measures to manage them. It also records how controls will be monitored and the requirements for record keeping and reviews. The program must be audited at least annually by an approved food safety auditor.
Food safety standards	Chapter 3 of the <i>Australia New Zealand Food Standards Code</i> . They provide details of how food businesses are to handle, prepare, store and sell food safely to protect public health.
FTE	Full time equivalent

Abbreviation/Term	Description
KPI	Key performance indicator
LG Act	<i>Local Government Act 1999</i>
Service level	The level of service the council wants to deliver to its community
Vulnerable people	Those that are in hospital, aged care facilities or childcare centres, and clients of delivered meal organisations

# Annexure

Information will be published on the Audit Office of South Australia's website

Section 32(6) of the *Public Finance and Audit Act 1987* allows the Auditor-General to publish information on a website. I have published a video summarising the results of this review on the Audit Office of South Australia's website – [www.audit.sa.gov.au](http://www.audit.sa.gov.au).

# References

---

- <sup>1</sup> Food Standards Australia New Zealand (FSANZ) 2025, *FSANZ updates estimate of annual cost of foodborne illness*, media release, 2 July, available at: <<https://www.foodstandards.gov.au/news/fsanz-updates-estimate-annual-cost-of-foodborne-illness>>, viewed 12 January 2026.
- <sup>2</sup> Australian National University 2022, *The annual cost of food-borne illness in Australia*, report prepared for Food Standards Australia New Zealand, Australian National University, Canberra, p. 40, available at: <<https://www.foodstandards.gov.au/sites/default/files/publications/Documents/ANU%20Foodborne%20Disease%20Final%20Report.pdf>>, viewed 25 March 2026.
- <sup>3</sup> Whiley, H & Ross, K 2024, *Implementation of the new food safety standard 3.2.2A*, report prepared for the 2024 external round of the Local Government Research and Development Scheme, Flinders University, Adelaide, p. 13, available at: <[https://www.lga.sa.gov.au/\\_\\_data/assets/pdf\\_file/0033/1886262/Implementation-of-the-new-Food-Safety-Standard-3.2.2A-Final-report-190325.pdf](https://www.lga.sa.gov.au/__data/assets/pdf_file/0033/1886262/Implementation-of-the-new-Food-Safety-Standard-3.2.2A-Final-report-190325.pdf)>, viewed 25 March 2026.
- <sup>4</sup> Department for Health and Wellbeing 2025, *Annual report 2024–25*, Government of South Australia, Adelaide, p. 58, available at: <<https://www.sahealth.sa.gov.au/wps/wcm/connect/dab6ffb1-5591-4f79-9820-b2252484e898/Appendix+1+-+Local+government+activities+under+the+Food+Act+2001+in+2024-25.pdf>>, viewed 25 March 2026.
- <sup>5</sup> Ibid



