



Compliance Strategy for Enforcement Agencies – Handling and Sale of Raw Egg-based Products

The sale and consumption of foods containing raw egg have been linked to recent food borne illness outbreaks in WA.

To reduce the incidence of foodborne illness and improve compliance in food businesses in WA, it is important for authorised officers to be aware of the potential risk associated with the use and manufacture of these products and focus on critical food handling practices within the food business.

Examples of foods containing raw egg

The foods linked to recent outbreaks are often condiments, sauces, or desserts and include;

- raw egg mayonnaise, aioli and hollandaise (made on premises)
- Vietnamese pork/chicken roll (made on premises) and
- deserts containing raw egg such as fried ice cream, mousse, tiramisu

Examples of premises selling these foods

- Restaurants (hollandaise, aioli, fried ice cream and other desserts)
- Asian style bakeries with sandwich bars (egg butter and raw egg mayonnaise)
- Cafes (salad dressing, desserts)

Safer Alternatives

Food businesses should reconsider the use of raw eggs in foods that do not receive further processing to render them safe (such as cooking). Safer alternatives to raw or lightly cooked egg products are available to food businesses and include; use of commercially available mayonnaises and sauces, use of pasteurised egg pulp in the manufacture of the sauces, desserts, and other foods.

Correct handling

If a business persists with the use of raw or lightly cooked eggs in food products, it is essential that correct handling and preparation is used. Safe and correct handling involves;

- temperature control (storage, processing and display)
- control over cross contamination
- cleaning and sanitizing (ideally a chemical sanitiser, correctly applied) of food contact surfaces
- good personal hygiene
- use of suitable ingredients (use of clean – no dirt or feathers - and uncracked eggs)

Assessment items (see Assessment Checklist – Raw Egg Use)

Where an authorised officer identifies that raw egg-based products are manufactured or sold within the food premises, the assessment checklist identifies both legal minimum requirements and best practice controls to assess.

Compliance Options

A number of strategies can be utilised by an authorised officer to improve compliance and food safety within businesses selling raw egg-based products. The level of intervention should be based on risk and/or compliance history. Options include;

If correct food handling **controls are in place**:

- Education – use of WA Department of Health Food Unit Notice, Advisory Letter and discussion of risks and alternatives

If correct food handling controls are not in place (use checklist), options include;

- Improvement notice (eg temp control, hygiene, sanitising, cross contamination)
- Infringement notice (as a deterrent, should be coupled with improvement notice)
- Prohibition order (on sale of raw or lightly cooked egg products) – until any defects identified are rectified
- Prosecution

(A worked example of a Prohibition Order is available).

Enforcement action should be graduated (unless serious breaches are observed, as per the Regulatory Guideline). An improvement notice with a short compliance timeframe generally achieves better outcomes than an infringement notice on its own.

For more serious breaches, or where there is a history of non-compliance, improvement notices (with a short compliance timeframe) coupled with an infringement notice can be used. For more urgent matters where a number of serious breaches are observed, or those scenarios outlined in the Regulatory Guideline, prohibition orders can be used.

A flowchart is enclosed to assist authorised officers with decision making processes.

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Authorised Officer Raw Egg-based Flow Chart

