

Food Safety Supervisor: the units, the legal requirement, and how the rules differ by state | Complete Hospitality Training

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Product

Product Facts

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Food Safety Supervisor: The Units, the Legal Requirement, and How the Rules Differ by State

Our Food Safety Supervisor course is listed as a one-day class at Level 3, 28 Elizabeth Street, Melbourne. Successful completion leads to Statements of Attainment for SITXFSA005 and SITXFSA006. Check the official course page for current delivery and enrolment arrangements. View our official course details and booking information . Course details checked 2 October 2026.

Course background and related accredited requirements

If you run a food business in Australia, the term Food Safety Supervisor (FSS) appears early and often in your compliance obligations. Yet the rules are not uniform across the country, and a document that satisfies the requirement in Victoria may leave a business in New South Wales exposed to a penalty. We set out the nationally recognised training units, the baseline legal obligation under the Food Standards Code, and the material differences between state regimes — so you can be confident your business is actually compliant, not just approximately compliant.

Two things catch businesses out more than anything else , and both are covered below: Standard 3.2.2A actually imposes three obligations, not one; and the units that satisfy the requirement depend on your sector , not just your state. A hospital and a cafe in the same Victorian class need different units.

Two skill sets, easily confused

Before anything else, settle which one you mean. We hold both and they are different things rather than a typo:

Skill set	Title	Units	On our scope since	What it is for

SITSS00068	Food Handling Skill Set	SITXFSA005	10 June 2022	The food handler level — Tool 1 below. This accredited level is one way to evidence Tool 1; the Standard also accepts commensurate skills and knowledge
SITSS00069	Food Safety Supervision Skill Set	SITXFSA005 + SITXFSA006	10 June 2022	The supervisor level — Tool 2 below. At least one appointed supervisor

The difference between them is exactly one unit, SITXFSA006, and both are held at the extent "deliver and assess" aligned to our registration period ending 30 June 2032. If an employer tells you to "get your food safety certificate", ask which number. The food handler level does not make you a Food Safety Supervisor in any state. See food handling for the handler level, or virtual food handling for the same unit delivered online.

The Two Nationally Recognised Units

For hospitality, Food Safety Supervisor certification is built on two units of competency from the SIT (Tourism, Travel and Hospitality) Training Package:

SITXFSA005 Use hygienic practices for food safety

SITXFSA006 Participate in safe food handling practices

Together these form the Food Safety Supervisor skill set SITSS00069 . These are nationally recognised units delivered by Registered Training Organisations (RTOs). Completion of both results in a Statement of Attainment issued by the RTO.

What each unit actually assesses

This is the part most course listings leave out, and it is the part that tells you whether a course you are comparing is really delivering the unit. The two units are not two halves of the same content; they test different things at different levels.

SITXFSA005 is the personal-practice unit. Its performance evidence requires the candidate to demonstrate hygienic food handling in line with organisational procedures, and to show each of the following on at least three separate occasions :

correct hand washing

appropriate use of uniform and personal protective equipment

effective personal health and hygiene practices

hygienic food service

It also requires the candidate to follow the procedures for reporting unsafe hygiene practices — the reporting duty, not only the practice itself. Three occasions is the reason this unit cannot honestly be assessed by a single multiple-choice quiz.

SITXFSA006 is the whole-system unit , and it is the harder of the two. It requires correct methods of controlling food hazards at each of nine critical control points :

#	Control point	#	Control point
1	Receiving	6	Serving
2	Storing	7	Packaging
3	Preparing	8	Transporting
4	Processing	9	Disposing
5	Displaying		

On top of the nine, SITXFSA006 requires the procedures to calibrate a temperature probe and the procedures for reporting food contamination incidents . That is HACCP-shaped content, and it is the reason the supervisor unit sits above handler training rather than beside it: a handler follows the controls, a supervisor has to know where the controls are, and has to be able to establish that the instrument measuring them is telling the truth.

Two practical consequences. First, probe calibration is the single most useful thing a small venue takes out of the supervisor course, because an uncalibrated probe makes every temperature record on the premises worthless. Second, if a course you are comparing does not mention calibration or the nine control points at all, ask what it is assessing.

SITXFSA005 is also the gateway to nine other units

Worth knowing if anyone in your business may go further than food safety, because it changes how you sequence training. SITXFSA005 is a formal prerequisite for nine units in the current food and beverage stream:

Unit	Title	Other prerequisite
SITHFAB022	Clean and tidy bar areas	—
SITHFAB023	Operate a bar	SITHFAB021 (RSA)
SITHFAB024	Prepare and serve non-alcoholic beverages	—
SITHFAB025	Prepare and serve espresso coffee	—
SITHFAB026	Provide room service	—
SITHFAB027	Serve food and beverage	—
SITHFAB030	Prepare and serve cocktails	SITHFAB021 (RSA) and SITHFAB023
SITHFAB034	Provide table service of food and beverage	SITHFAB021 (RSA)
SITHFAB035	Provide silver service	—

Read that figure as scoped to the food and beverage stream. Across the wider SIT package SITXFSA005 also sits in front of cookery, patisserie, Asian cookery, kitchen operations and inventory units, so a total for the whole package would be a different number about a different set of units. Four units in this stream carry two or more prerequisites — SITHFAB023 and SITHFAB034 carry two, and SITHFAB030 and SITHFAB039 Manage the sale or service of wine carry three — and RSA is one of

them every time. It is worth adding that SITHFAB021 RSA is itself a prerequisite to nine units in this stream, exactly as many as the food safety unit.

So the half of the FSS pair that everyone completes first also unlocks the coffee and service units. A free non-accredited food safety course, by contrast, opens none of them — a prerequisite can only be satisfied by the unit itself. See barista training , restaurant waiting and hospitality package .

The retail alternative

There is a second pathway that businesses often do not know exists. Where a business provides food as a product rather than as a service — takeaways, supermarkets, convenience stores, grocers, delicatessens — the applicable unit is:

SIRRFSA001 Handle food safely in a retail environment

Both New South Wales and Victoria accept either the hospitality pair or the retail unit, chosen according to the nature of the business. Safe Food Victoria goes further and lists the two alternatives in both directions: the hospitality pair satisfies the retail sector as well, and the retail unit satisfies hospitality . So a person holding SITXFSA005 and SITXFSA006 is covered in a Victorian deli or supermarket as well as in a restaurant, which is a good reason to prefer the pair if someone may move between the two.

One caution on availability rather than acceptance: SIRRFSA001 carries an end date of 28 June 2024 on our scope of registration. It remains a unit that people hold and that Safe Food Victoria still names, but it is not a unit we enrol anyone in today. Picking the wrong pathway is a common and avoidable error, and so is assuming a named unit is still on offer.

A Note on the Superseded Code

SITXFSA005 supersedes the older unit code SITXFSA001. The two units carry an EQUIVALENT designation, which means anyone who holds a Statement of Attainment for SITXFSA001 has not lost their standing — no gap training is required. If you completed the older unit, your qualification remains valid for the purposes of the competency requirement, subject to the five-year currency rules discussed below. Western Australia publishes the point explicitly, listing the superseded skill set SITSS00051 (SITXFSA001 + SITXFSA002) among the equivalents it accepts.

Both SITXFSA005 and SITXFSA006 are on the scope of registration of Complete Hospitality Training (RTO 3722) .

The National Baseline: Standard 3.2.2A of the Food Standards Code

The foundation of the FSS obligation across Australia is Standard 3.2.2A of the Australia New Zealand Food Standards Code, which commenced 8 December 2023 . Understanding this standard is essential before examining how individual states build on — or depart from — it.

The duty that existed before it, and still does

Standard 3.2.2A is often described as the moment food safety training became compulsory in Australia. It was not. Clause 3 of Standard 3.2.2 has applied to every Australian food business since 2000 : the business must ensure that persons undertaking or supervising food handling operations have skills in food safety and food hygiene matters, and knowledge of them, commensurate with their work activities .

Clause 3 is outcome-based . It names no course, no certificate, no unit code and no refresher period — it simply requires the competence to be present. Its only carve-out is narrow: it does not apply in

relation to persons handling food for fundraising events at which the only food sold is food that is not potentially hazardous, or is to be consumed immediately after thorough cooking.

Standard 3.2.2A did not change clause 3. It added a prescriptive layer on top of it for category one and two businesses. Two consequences follow, and both matter commercially. A Class 3 or Class 4 Victorian premises with no FSS obligation is not outside food safety training law — it still answers to clause 3. And a category one business answers to both : the prescriptive tools below, and the outcome duty underneath them.

Standard 3.2.2A imposes three tools, not one

This is the structural point most summaries miss. The standard sets out three food safety management tools , and appointing an FSS is only the second of them.

Tool	Clause	What it requires	Category One	Category Two
1. Food handler training	3.2.2A–10	Each food handler must have completed food safety training, or hold skills and knowledge commensurate with the activity, before engaging in it	Yes	Yes
2. Food safety supervisor	3.2.2A–11	Appoint a certified FSS, reasonably available to advise and supervise food handlers	Yes	Yes
3. Substantiation and records	3.2.2A–12	Make a record substantiating compliance, kept for 3 months	Yes	Not applicable

So a category one business complies with clauses –10, –11 and –12, and a category two business with –10 and –11. One clause is the entire difference in obligation between the two categories.

What triggers all three is the same thing: the prescribed activity. A prescribed activity is the handling by the food business of any unpackaged potentially hazardous food that either is used in preparing ready-to-eat food to be served to a consumer, or is itself ready-to-eat food intended for retail sale by that business. Both the handler training and the supervisor appointment must be in place before the business engages in it — which is why "we will book the course next month" is not a compliance position on opening week.

Tool 1 — food handler training. This is a separate obligation from the FSS appointment and it applies to every food handler. It must cover safe food handling, prevention of contamination, cleaning and sanitising of premises and equipment, and personal hygiene. Notably, no refresher period is set by regulation for food handler training, no national VET accreditation is required , and record keeping of it is optional — though the business must still ensure its handlers' knowledge remains adequate. Prior learning may be recognised by the business itself, through competency-based training, in-house education, a food safety induction completed at another food business, or relevant prior industry experience. Note that bar staff are usually food handlers too: anyone handling ice, cut fruit or

unpackaged garnishes is handling food. See bartending .

Tool 3 — substantiation. Category one businesses must make records showing compliance with the prescribed provisions covering receipt, storage, processing, display, transport, and cleaning and sanitising of potentially hazardous food. Records must be kept 3 months and be accessible at the premises. Importantly, the requirement does not apply to a business that can demonstrate compliance to the reasonable satisfaction of an authorised officer on request — so it is a substantiation obligation rather than a paperwork mandate, and an authorised officer may then require the records.

Which businesses are category one and category two?

The definitions are narrower and more precise than "any food business", and the distinction decides whether Tool 3 applies to you.

Category one means a food business that is a caterer or a food service , and that processes unpackaged potentially hazardous food into food that is both potentially hazardous and ready-to-eat. Regulator examples: restaurants and cafes, fast food outlets and takeaways, caterers, bakeries, hospitals, aged care, childcare centres, school canteens, family day care, mobile food vendors, market stalls, and service stations, supermarkets or delis that make and serve food.

Category two means a food business offering for retail sale food that is potentially hazardous and ready-to-eat, where the food was received or unpackaged by the business and was not made or processed by it — other than slicing, weighing, repacking, reheating or hot-holding . Regulator examples: delicatessens, some supermarkets and service stations, seafood retailers, butchers, some market stalls, convenience stores.

That list of five permitted handling steps is the practical test. A deli that slices and repacks is category two; the moment it starts making sandwiches, it is category one and Tool 3 applies.

Two exemptions sit outside both categories: fundraising events raising funds solely for community or charitable causes rather than personal gain, and businesses that do not handle unpackaged potentially hazardous ready-to-eat food at all.

What the Standard Requires of the FSS

The appointed Food Safety Supervisor must:

Hold a food safety supervisor certificate issued within the immediately preceding five years , from an RTO or an organisation recognised by the relevant state authority — the five-year currency rule is embedded in the national standard itself, in the definitions clause 3.2.2A–2.

Have the authority and ability to manage and give direction on the safe handling of food.

Be reasonably available to advise and supervise each food handler engaged in the prescribed activity.

That first limb is worth reading closely, because it is the drafting decision behind every state difference on this page. The Standard defines a food safety supervisor certificate as certification by either (a) a registered training organisation, or (b) an organisation recognised by the relevant authority under the state's application Act. Limb (b) is an invitation, written into the national standard, for any state that wants one to build its own certificate scheme on top of the national units. New South Wales is the only state that has taken it up. Victoria, Queensland and Western Australia rely on limb (a) alone, which is precisely why the artefact in those states is the RTO's Statement of Attainment and in New South Wales it is a separate state document. The NSW scheme is not a departure from the national standard; it is the national standard used as designed, by one state.

On "reasonably available": regulator guidance is that the FSS should work onsite and oversee the handling of high-risk unpackaged food, or be easily contactable, for example by phone. Queensland Health puts it as physically working on site and overseeing day-to-day food handling, or being easily contactable where documented food handling procedures are in place; short absences such as

holidays of up to 30 days are workable on that basis, but extended leave requires another supervisor to be appointed. It is not reasonable to appoint someone who does not regularly handle food as part of their normal duties, or who is never onsite. A name on a register is not an appointment.

The sector trap: which units you need depends on what kind of business you are

This catches out aged care, childcare and hospital operators in particular, and it is worth reading even if you think it does not apply to you.

The SITXFSA hospitality units are not the right units for every setting. Both Victoria and Queensland publish sector-specific minimum standards:

Sector	Required units
Hospitality — restaurants, cafes, hotels, pubs, clubs	SITXFSA005 + SITXFSA006 (or the retail unit)
Retail — supermarkets, convenience stores, grocers, delicatessens	SIRRFSA001 (or both hospitality units)
Health — hospitals	HLTFSE001 + HLTFSE005 + HLTFSE007 , Release 1 of each
Community services — childcare, nursing homes, hostels, Meals on Wheels	HLTFSE001 + HLTFSE005 + HLTFSE007
Food processing — manufacturers, mills, canneries, packers, bakers, breweries, wineries	FBPFSY2002 (or FBPFSY1002 in Queensland)
Transport and distribution — warehouses	The standard for whichever sector the warehouse serves

Note the trap this creates in Victoria. Class 1 premises include hospitals, residential aged care and children's services — precisely the settings that require the three HLTFSE units rather than the hospitality pair. A childcare centre that sends staff to a standard hospitality food safety course has bought training that does not meet its own state's minimum standard.

The same split applies in Queensland: health and community services licensed businesses need HLTFSE001, HLTFSE005 and HLTFSE007; food processing businesses need FBPFSY2002 or FBPFSY1002.

Three points of precision, because this row is commonly stated wrongly:

Standard 3.2.2A itself names no sector units at all. The health and community services requirement is a state determination, published by Safe Food Victoria and by Queensland Health.

New South Wales names no sector-specific units in its published supervisor requirements, so a page telling you the HLTFSE units are mandatory in NSW is telling you something NSW has not published.

Western Australia treats them as an equivalent, not a mandate. WA Health publishes HLTSS00061 — the same three HLTFSE units bundled as a skill set — as an accepted alternative, and does not confine health or childcare businesses to it; those businesses may use SITSS00069 instead.

And the honest disclosure this page owes you. Of the three health units, only HLTFSE001 is on our scope of registration. HLTFSE005 and HLTFSE007 are not, and neither is FBPFSY2002 or HLTSS00061. So if you run a hospital kitchen, an aged care kitchen, a childcare service or a food processing business in Victoria or Queensland, we cannot complete the set your regulator publishes for you, and you need a provider that holds all three health units on scope. Check that on training.gov.au before enrolling with anyone, including us.

This is the single most expensive mistake on this page, and one question before enrolling avoids it.

How the Rules Differ by State

This is where businesses most commonly make mistakes. The national standard sets a floor; states may impose additional requirements on top of it.

The reason they can is structural. FSANZ writes the standards under the Food Standards Australia New Zealand Act 1991, and they are then adopted by reference into each state's food Act — the application Act. On their own the standards have no legal force. The regulatory guidance draws the boundary in one sentence: enforcement, penalties, business classification and any state-issued certificate are matters for the application Act, not for the Code. Everything in the four sections below is one of those four things.

New South Wales

New South Wales operates a state FSS certificate scheme that sits on top of the national training units, and this distinction is critical. The governing law is the Food Act 2003 (NSW), Part 8 Division 3 (ss 106–106J), administered by the NSW Food Authority with enforcement shared with local councils.

The NSW Food Authority approves RTOs to issue the NSW FSS certificate. Completing SITXFSA005 and SITXFSA006 with any RTO produces a nationally recognised Statement of Attainment — but in NSW, that Statement of Attainment alone does not satisfy the legal requirement.

Section 106B(3) defines the certificate itself: a document stating that the holder is qualified to be a food safety supervisor, issued in accordance with the regulations by an approved training organisation.

Section 106H is the approval power — only approved RTOs, trainers and assessors may deliver the training and issue the certificate, and this is the defining feature of the NSW scheme: state approval is required in addition to ASQA registration.

When a learner completes the required training with an NSW Food Authority-approved RTO, that RTO issues two separate documents:

The Statement of Attainment (the nationally recognised training record), and

The NSW FSS certificate (the state compliance document).

It is the NSW FSS certificate — not the Statement of Attainment — that must be kept on the premises and produced on request by an authorised officer. The certificate must have been issued within the immediately preceding five years; it is not permanent. An approved RTO must issue it within 10 working days of successful completion.

The NSW FSS certificate must cover four mandatory key focus areas determined by the Food Authority:

Allergen management

Cleaning and sanitising practices

Safe egg handling

Food Act offences

That fourth one is the one usually left off a list of three, and it is the reason a plain national Statement of Attainment is insufficient in NSW: the approved RTO has to wrap NSW-specific content around the national units.

The structural pattern is worth noting because it recurs across Australian regulation: NSW regulates the provider, whereas Victoria, Queensland and Western Australia regulate the credential. The same split governs Responsible Service of Alcohol, where NSW again requires a state-approved provider and a state-issued card. See RSA in New South Wales.

One person, one premises — the NSW statutory bar

A constraint unique to NSW, and easily missed by multi-site operators: under s 106B(1)(b) , a person who is the food safety supervisor for one premises cannot hold the position for any other premises, or for a mobile catering business.

So a group running four cafes needs four supervisors, not one supervisor covering four sites. All retail, hospitality and food service businesses must appoint at least one FSS per premises where the food prepared and served is ready-to-eat, potentially hazardous, and not sold in the supplier's original package. That reaches cafes, restaurants, quick service venues, takeaways, pubs and clubs with food service, mobile vendors, home-based businesses, caterers, motels, supermarkets selling potentially hazardous food, school canteens, children's services providing meals, boarding schools and correctional centres.

Continuity, the 30-day defence, and the penalty scale

NSW is also the only one of the four states that attaches monetary penalties to the appointment duty itself, and the numbers are worth knowing because they are stated in penalty units rather than dollars.

Duty	Maximum penalty, individual	Maximum penalty, corporation
Appointing an FSS before the food is processed and sold by retail, and continuing to have one at all times	50 penalty units	100 penalty units
Keeping a copy of the certificate on the premises and producing it on request, s 106G	25 penalty units	50 penalty units

There is one narrow statutory defence. Where an FSS has ceased, the food may still be processed and sold by retail on not more than 30 days before a replacement is appointed. That is the whole of the grace period, and it is a defence rather than an entitlement — the safer reading is that a business has a month to fix it, not a month of cover.

For mobile catering, the certificate copy may be kept at the proprietor's business address rather than on the vehicle.

A lapsed certificate has its own mechanics. A recertification course can only be offered up to 90 days after the expiry date; past that, the full course must be completed again. Recertification is available only to someone who already holds or held a NSW certificate, not every approved RTO offers one, and it must be completed with a single approved RTO rather than split across providers. The Food Authority's published list marks which providers offer recertification.

■■ Important Warning for NSW Businesses

In NSW, a Statement of Attainment is NOT an FSS certificate. A food business that holds only the Statement of Attainment on its premises has not satisfied section 106G of the Food Act 2003 (NSW). The absence of the NSW FSS certificate — even where the underlying training has been completed — leaves the business non-compliant and potentially liable to enforcement action.

If you are in NSW and are unsure whether your FSS holds the correct document, check with the issuing RTO. If the RTO that delivered the training is not approved by the NSW Food Authority, the NSW FSS certificate will not have been issued, regardless of what training was completed. The Food Authority maintains a publicly available list of approved training organisations, revised at least annually, and each approved RTO carries a NSW Food Authority approval number that is different from its national RTO code . So verifying a NSW course means checking two registers and two numbers, not one.

Note: Complete Hospitality Training is not currently approved by the NSW Food Authority. NSW businesses requiring the state FSS certificate should confirm that their chosen provider appears on the NSW Food Authority's approved RTO list before enrolling. We can still deliver SITXFSA005 for the NSW food handler obligation under Tool 1, which is a separate requirement.

Victoria

Victoria takes a different approach. Safe Food Victoria — the state's dedicated food safety regulator, established under the Safe Food Victoria Act 2026 — approves a competency standard, effectively a list of unit codes, that defines what training satisfies the FSS requirement. Victoria issues no state certificate . The RTO's Statement of Attainment against the approved units is the compliance evidence. Day-to-day registration of premises remains with the local council .

What the Food Act 1984 actually says

The Victorian test is not "holds a certificate". Section 19G of the Food Act 1984 defines a food safety supervisor as a person who satisfies three limbs, all of them:

knows how to recognise, prevent and alleviate the hazards associated with the handling of food at, or from, the premises; and

has met an appropriate food safety competency standard for premises of the same nature as the premises; and

has the ability and the authority to supervise other people handling food at, or from, the premises, and to ensure that handling is done safely.

A food safety competency standard means a standard approved in writing by Safe Food Victoria , or by a relevant State, national or international statutory or regulatory body. That is the legal status of the unit list above: approved in writing, not merely suggested.

The certificate speaks only to the second limb. The third is the one businesses routinely fail without noticing: a competent casual with no standing to direct other staff does not satisfy s 19G however current their certificate. That is the legal reason the FSS is usually a chef, manager or owner.

Provision	What it does
s 19C	The Secretary may declare classes of food premises and specify whether each class requires a food safety supervisor
s 19GA(1)	Where a s 19C declaration requires one, the proprietor must ensure there is a food safety supervisor for the premises
s 19GA(2)	An FSS is not required where a quality assurance food safety program is used that includes competency-based or accredited training for staff
s 19GA(3)	The food safety supervisor for a premises may be the proprietor
s 19GB	On written request, the proprietor must give the registration authority written details of the name and qualifications of the current FSS within 7 days

And the sanction, which is not a fine

This is the most commonly missed fact about the Victorian scheme. No monetary penalty attaches to s 19GA. Where NSW and Queensland both attach penalty units to the equivalent failure, Victoria's sanction is registration-based : failing to comply with the food safety supervisor requirement is a ground for refusal of registration or renewal , or for revocation or suspension of the registration of the food premises .

That is not the lighter option. A fine is a cost; a suspended registration is a closed business. An operator who reasons that the worst case is a penalty has misread which Act they are under.

The governing law is the Food Act 1984 (Vic), which operates a class-based system for food premises. Councils classify on the highest-risk activity undertaken at the premises. Premises required to have an FSS:

Class	What it covers	FSS required?
Class 1	Premises serving potentially hazardous food to patients, residents or service recipients — hospitals, day procedure centres, multipurpose services, residential aged care, children's services; premises preparing ready-to-eat food for delivery to aged or frail people; supported residential services where residents are mostly aged persons	Yes
Class 2	Premises handling or manufacturing any unpackaged potentially hazardous food, or manufacturing low-risk food with an allergen-free claim — restaurants, cafes, pubs, hotels, clubs, supermarkets, delicatessens, caterers, canteens, fast food outlets, juice bars	Yes (most)
Class 3A	Accommodation-getaway premises preparing potentially hazardous food — B&Bs, farm stays, guesthouses; hot-fill acidic products made at home-based or temporary premises	Yes
Class 3	Unpackaged low-risk food; warehousing and distribution of pre-packaged food; sale of pre-packaged potentially hazardous food	No
Class 4	Lowest risk — pre-packaged low-risk food, community sausage sizzles, packaged cakes at temporary premises, wine tasting, whole uncut fruit and vegetables	No

Safe Food Victoria states the rule as Class 1, most Class 2 and Class 3A premises must have a food safety supervisor. Classes 1, 2, 3 and 3A are registered with council; Class 4 notifies rather than registers.

Three Victorian exemptions are worth knowing:

Class 3 and Class 4 premises need no FSS, though proprietors must still ensure staff have the skills and knowledge for their roles — which is clause 3 of Standard 3.2.2, not a Victorian invention.

Some Class 2 community groups are exempt where all three of the following apply: the proprietor is a community group, the operation runs for no more than two consecutive days at a time, and most people handling food are volunteers. A commercial operator running a two-day event does not qualify.

Premises operating a QA food safety program that includes competency-based or accredited staff training, under s 19GA(2).

Multi-site supervision is permitted in Victoria, which is the mirror image of the NSW bar. One person may be the FSS across a number of premises provided the local council is satisfied with the arrangement, and where the premises sit in different municipalities each council must be satisfied separately. The FSS also does not have to be on the premises at all times, but must be able to know how food is being handled when they are not there.

Because Victoria issues no separate state certificate, the Statement of Attainment from a registered RTO — including Complete Hospitality Training — serves as the compliance document. Retain it on site.

Safe Food Victoria also states plainly that there is no Victorian requirement for a food safety supervisor to undertake training beyond the minimum competencies listed. A provider recommending an extra module for Victorian compliance is recommending something Victoria has not asked for.

One point of nuance on expiry. A Statement of Attainment is a record that competency was assessed on a date, and as a document it does not lapse. The five-year rule is a requirement that the certification be recent, under Standard 3.2.2A. It is worth being precise about where that rule comes from in Victoria: Safe Food Victoria publishes no Victorian renewal or refresher period, and its supervisor guidance notes that prior training does not usually need repeating and that superseded course codes remain valid. The five years reaches Victoria through the Code, applied by the Food Act 1984, rather than through a Victorian instrument. It applies — but if your council cannot show you a Victorian page saying "five years", that is not evidence against it. The practical consequence is the same: a supervisor certified six years ago no longer satisfies the standard, and the fix is fresh training, RPL or a refresher rather than retrieving old paperwork.

Queensland

Queensland ties the FSS obligation directly to the food business licence, rather than to a premises classification system. The governing law is the Food Act 2006 (Qld), administered by Queensland Health with enforcement carried out by local government.

A licensable food business is one that involves the manufacture of food; the sale of unpackaged food by retail by an entity other than a non-profit organisation; or the sale, on at least 12 days each financial year, of meals prepared by a non-profit organisation at a particular place. If the business holds a licence, it must appoint an FSS. Statutory examples in the retail limb include restaurants, delicatessens, catering businesses, takeaway pizza shops, motels supplying meals with accommodation, and businesses selling hamburgers from a vehicle or unpackaged food from a vending machine.

Some activities fall outside licensing altogether. A business needs no licence if it consists only of primary produce production accredited under the Food Production (Safety) Act 2000; the sale of unpackaged snack food that is not potentially hazardous (biscuits, cakes, confectionery, chips, nuts, dried fruit); whole fruit or vegetables; seeds, spices, dried herbs, tea leaves, coffee beans or ground

coffee; drinks other than processed fruit or vegetable juice, including tea, coffee, soft drinks and alcohol; ice or flavoured ice; or certain non-profit meal sales, including simple or self-assembled meals, pre-prepared meals merely heated per the manufacturer's directions, and meals prepared as part of educational or training activities.

Section 86 is the operative provision: a licensee must have a food safety supervisor within 30 days after the licence is issued , and must at all times continue to have one while holding the licence, with a maximum penalty of 50 penalty units . The licensee may be the supervisor, and may appoint more than one.

Queensland issues no state certificate and imposes no state-level approval on RTOs — a Statement of Attainment for SITXFSA005 + SITXFSA006 (skill set SITSS00069), or SIRRFSFA001, from any Australian RTO satisfies the requirement, whether obtained in Victoria, NSW, WA or elsewhere. Queensland Health's position is that it does not matter where the RTO is located.

One Queensland-specific catch on recertification: for category one and two businesses the complete FSS course must be repeated every five years, and recognition of prior learning will not be accepted for that recertification. Queensland Health states it flatly. Some RTOs offer a refresher course for those who have held the qualification previously, but you cannot RPL your way through a five-year renewal in Queensland — and Victoria takes the exact opposite position, actively pointing supervisors toward RPL. A group operating in both cannot run one renewal model.

Queensland also imposes specific notification obligations , of the supervisor's name and contact details :

within 30 days of the food business licence being issued

within 14 days after a person becomes an FSS

within 14 days after a person stops being an FSS

within 14 days after an FSS's contact details change

Each breach carries a maximum penalty of 50 penalty units . Missing these notification windows is a separate compliance issue from the training requirement itself, so businesses should have a process for tracking both.

In Queensland, "reasonably available" also has a second audience: the FSS must be reasonably available to be contacted both by the local government that issued the licence and by the people who handle food in the business.

For food handler training under Tool 1, Queensland accepts DoFoodSafely — a free online course recognised by enforcement agencies — courses from RTOs, or training developed by the food business itself, provided it covers the four required topics. Note that DoFoodSafely produces no Statement of Attainment and therefore satisfies no prerequisite.

Western Australia

Western Australia maps directly onto Standard 3.2.2A with no separate state scheme layered on top, under the Food Act 2008 (WA), administered by the Department of Health WA through its Environmental Health Directorate. WA Health names SITSS00069 as the baseline skill set for meeting the FSS requirement — it is the only one of the four states to name the code rather than describe the outcome.

WA Health has also assessed and published equivalent alternatives:

SIRRFSFA001 Handle food safely in a retail environment, as a single unit

HLTSS00061 Food safety supervision skill set, for community services and health industries —
HLTFSE001 + HLTFSE005 + HLTFSE007

SITSS00051 , the superseded skill set, being SITXFSA001 + SITXFSA002

Interstate certificates are fully recognised. WA's test is a Statement of Attainment from any RTO for the named units, issued within the past five years. Nothing conditions recognition on the state of issue, and online delivery is expressly accepted — WA Health's provider table carries a dedicated online-course column.

One caution: WA's list is not an approval scheme

This matters because it is the same trap as "OLGR-approved" in liquor. WA Health publishes a table of RTOs offering food safety supervision training, including providers based in other states. That table is a convenience listing of self-notified providers, not an approval register. WA requires RTOs to be registered on the national register, not approved by WA, and directs readers there to verify a provider.

Two consequences. A provider absent from WA's table is not disqualified — a Statement of Attainment from any nationally registered RTO is valid in WA. And a provider claiming to be "WA-approved" is describing a scheme that does not exist. New South Wales is the opposite case: there the register genuinely is an approval scheme, under s 106H.

The practical implication is that the nationally recognised Statement of Attainment is the compliance document in WA. There is no state certificate, number, register or fee. See RSA in Western Australia for the same regulate-the-credential pattern applied to liquor.

Summary Comparison at a Glance

State	State Certificate?	Compliance Document	RTO Approval Required?	Notification Requirement ?	One FSS per premises?	Sanction for no FSS
NSW	Yes — issued by approved RTOs only, limb (b)	NSW FSS Certificate (+ Statement of Attainment)	Yes — NSW Food Authority, s 106H	No	Yes — statutory bar, s 106B(1)(b)	50 penalty units individual / 100 corporation; 30-day replacement defence
VIC	No	Statement of Attainment	No	On written request within 7 days, s 19GB	No — multi-site permitted if each council is satisfied	No monetary penalty. Refusal, revocation or suspension of registration
QLD	No	Statement of Attainment	No	Yes — local government, 30 and 14 days	No — more than one may be appointed	50 penalty units, s 86
WA	No	Statement of Attainment	No — the published list is a convenience listing, not an approval	No	Not specified	Not separately stated

			scheme			
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All states are subject to the five-year currency requirement under Standard 3.2.2A. Penalty units are given as counts rather than dollar amounts, because the value of a penalty unit is indexed annually in every jurisdiction.

Recognition, credit transfer and your USI

Two mechanisms, often confused, and the distinction changes what you have to do.

Credit transfer , under Standard 1.7 of the Outcome Standards for RTOs, recognises a unit you have already completed at any Australian RTO. It requires no reassessment — your Statement of Attainment is the evidence. Someone who holds SITXFSA005 from a barista course and now needs the supervisor pair only has SITXFSA006 left to complete. We first verify the evidence and equivalence, check that the units fit your training product, and check for licensing or regulatory restrictions before granting credit. See ASQA's credit-transfer guidance .

Recognition of prior learning , under Standard 1.6 , assesses skills gained without formal training. It is a genuine assessment against the same requirements, not a waiver. Note the Queensland exception above: RPL will not be accepted for a five-year FSS recertification there, and Victoria is the opposite.

Raise either at the pre-training review , which an RTO must conduct under Standard 2.2 of the Outcome Standards for RTOs before enrolment. See skills assessment .

For nationally recognised training, a Unique Student Identifier (USI) is generally required before a qualification or Statement of Attainment can be issued , unless an applicable exemption applies. See the official USI exemption guidance . A USI is free at usi.gov.au . If you already have one, recover it rather than creating another.

Related pages

Food handling covers the food handler level and Tool 1 in depth, and virtual food handling delivers the same unit online. Hospitality package shows how SITXFSA005 sequences ahead of the beverage and service units. SIT40422 Certificate IV in Hospitality lets you complete both FSS units inside a qualification. How long a Food Safety Supervisor certificate lasts in Victoria covers currency in detail, and how long do I need to keep records for covers Tool 3. All courses lists what is advertised, and about us carries the registration record.

About Complete Hospitality Training

Complete Hospitality Training is a Registered Training Organisation (RTO 3722, CRICOS 04242E) delivering nationally recognised hospitality and food safety qualifications. Both SITXFSA005 and SITXFSA006 are on our national scope of registration, as are the skill sets SITSS00068 Food Handling and SITSS00069 Food Safety Supervision . According to our current delivery information, they are available in all eight states and territories. Our scope holds 17 current qualifications, 81 current skill sets and 579 units in total.

Contact details:

Address: Level 3, 28 Elizabeth Street, Melbourne VIC 3000, and 410 Elizabeth Street, Surry Hills NSW 2010

Email: melbourne@cht.edu.au

Phone: +61 3 9654 1554

If you have questions about which units apply to your state and sector, whether a qualification is current, or how to enrol a team member, our team is available to assist. Two limits stated plainly: we are not approved by the NSW Food Authority and cannot issue the NSW FSS certificate; and where your sector requires the HLTFSSE or FBPFSSY units rather than the hospitality pair, only HLTFSSE001 is on our scope, so we cannot complete the health and community services set. Ask before enrolling, and check the provider's scope on training.gov.au.

We link to the relevant course and regulatory sources in this guide. Check those sources for current requirements, and confirm course availability, delivery, fees and entry requirements with us before enrolling.

What is the difference between SITSS00068 and SITSS00069?

Exactly one unit. SITSS00068 is the Food Handling Skill Set, at the food handler level, and contains SITXFSA005. SITSS00069 is the Food Safety Supervision Skill Set and adds SITXFSA006. We hold both, on scope since 10 June 2022. The handler level does not make you an FSS.

What does SITXFSA006 test that SITXFSA005 does not?

Control of food hazards at nine critical control points — receiving, storing, preparing, processing, displaying, serving, packaging, transporting and disposing — plus the procedures to calibrate a temperature probe and to report food contamination incidents. SITXFSA005 is personal practice, demonstrated on at least three occasions; SITXFSA006 is the whole system.

How many obligations does Standard 3.2.2A actually impose?

Three. Food handler training for every handler (clause 3.2.2A–10), appointment of a certified FSS (–11), and — for category one businesses only — substantiation records kept for three months (–12). Most businesses focus on the second and overlook the first and third.

Was there any training duty before December 2023?

Yes, and it still applies. Clause 3 of Standard 3.2.2 has required every Australian food business since 2000 to ensure that people undertaking or supervising food handling have skills and knowledge of food safety and hygiene commensurate with their work activities. It is outcome-based, with no course, certificate or refresher. Standard 3.2.2A added a prescriptive layer on top; it did not replace clause 3.

Does the FSS need to be on-site at all times?

No. The standard requires the FSS to be "reasonably available" to advise and supervise food handlers. Guidance is that they should work onsite overseeing high-risk unpackaged food handling, or be easily contactable by phone where documented procedures are in place. Queensland treats holidays of up to 30 days as workable on that basis but requires another supervisor for extended leave. Appointing someone who never handles food or is never onsite is not reasonable.

Can a business have more than one FSS?

Yes. Many businesses appoint multiple holders to cover shifts. But note the reverse constraint in NSW: one person cannot be the FSS for more than one premises, or for a mobile catering business, under s 106B(1)(b). Multi-site operators in NSW need a supervisor at each site. Victoria permits the opposite, provided each relevant council is satisfied.

Do food handlers need training records kept?

Under the national standard, record keeping for food handler training is optional, no refresher period is set, and the training need not be nationally accredited. The business must still be able to show its handlers' skills and knowledge are adequate for what they do.

We are a childcare centre. Are the hospitality units enough?

No. Children's services, aged care and hospitals sit in the health and community services sector, where the published minimum standard in Victoria and Queensland is HLTFS001 + HLTFS005 + HLTFS007. The SITXFSA hospitality units do not meet it, even though those premises are Class 1 in Victoria. Only HLTFS001 is on our scope, so we cannot complete that set and you should use a provider that holds all three.

Are we category one or category two?

If you process unpackaged potentially hazardous food into ready-to-eat food, you are category one and the substantiation tool applies. If you only slice, weigh, repack, reheat or hot-hold before retail sale, you are category two and it does not.

What happens when the FSS certificate expires?

Currency must be restored before the five-year period lapses. A business whose FSS certification is out of date is non-compliant with Standard 3.2.2A for the period of the lapse. In Queensland a new certificate is required at least every five years and RPL is not accepted (<https://www.qld.gov.au/health/staying-healthy/food-pantry/running-a-food-business/other-requirements/food-safety-tools-standard>); the RTO may use a full course or an available refresher pathway. In NSW a recertification course is available only within 90 days of expiry, only to an existing or former NSW certificate holder, and through an approved RTO that offers recertification. The NSW Food Authority (<https://www.foodauthority.nsw.gov.au/retail/fss-food-safety-supervisors>) says some approved RTOs offer this pathway; it is not limited to one named provider. In Victoria a refresher or RPL is available.

What is the penalty in Victoria for having no supervisor?

There is no monetary penalty. Section 19GA carries none. The sanction is registration-based: refusal of registration or renewal, or revocation or suspension of the premises' registration. That is a larger commercial exposure than a fine, not a smaller one. NSW attaches 50 penalty units for an individual and 100 for a corporation to the same failure; Queensland 50 under s 86.

What makes someone a food safety supervisor in Victorian law?

Section 19G of the Food Act 1984 sets three tests, all of which must be met: knowing how to recognise, prevent and alleviate the hazards at those premises; having met an appropriate food safety competency standard for premises of that nature, meaning one approved in writing by Safe Food Victoria or an equivalent body; and having the ability and the authority to supervise other food handlers. The certificate answers only the second test.

Does the FSS have to be the owner or manager?

No — but in Victoria s 19GA(3) expressly permits it, and the s 19G authority limb means the person must genuinely be able to direct food handlers and rectify issues. The role cannot be nominal.

Is SITXFSA001 still accepted?

SITXFSA001 has been superseded by SITXFSA005, which carries an EQUIVALENT designation. Holders of SITXFSA001 do not need gap training. Western Australia lists the superseded skill set SITSS00051 among its accepted equivalents. The five-year currency clock runs from the date of the original certification, regardless of which code appears on the Statement of Attainment.

Can I use the retail unit instead of the hospitality units?

It depends on your business. SIRRFA001 is the retail pathway, for businesses selling food as a product. NSW and Victoria both accept either pathway, matched to the nature of the business, and Safe Food Victoria accepts each as an alternative to the other. Note that SIRRFA001 carries an end date of 28 June 2024 on our scope, so it is a unit people hold rather than one we enrol you in today.

Does SITXFSA005 unlock anything else?

Yes — it is a prerequisite for nine units in the current food and beverage stream: SITHFAB022 clean and tidy bar areas, SITHFAB023 operate a bar, SITHFAB024 non-alcoholic beverages, SITHFAB025 espresso coffee, SITHFAB026 room service, SITHFAB027 serve food and beverage, SITHFAB030 cocktails, SITHFAB034 table service and SITHFAB035 silver service. SITHFAB023, SITHFAB030 and SITHFAB034 additionally require SITHFAB021 RSA, and SITHFAB030 requires SITHFAB023 as well.

I already hold SITXFSA005. Do I redo it for the FSS pair?

No. That is credit transfer under Standard 1.7 — no reassessment, your Statement of Attainment is the evidence. You complete SITXFSA006 only. The exception is a Queensland five-year recertification, where fresh certification is required at least every five years and RPL is not accepted (<https://www.qld.gov.au/health/staying-healthy/food-pantry/running-a-food-business/other-requirements/food-safety-tool-s-standard>); an RTO may offer a full course or a refresher pathway. We first verify the evidence and equivalence, check that the units fit your training product, and check for licensing or regulatory restrictions before granting credit.

Why does NSW get a state certificate when nobody else does?

Because Standard 3.2.2A allows it. The Standard defines a food safety supervisor certificate as certification by either (a) a registered training organisation or (b) an organisation recognised by the relevant authority under the state's application Act. NSW is the only state that has exercised limb (b). Victoria, Queensland and WA use limb (a) only.

Who regulates food safety in Victoria now?

Safe Food Victoria, established under the Safe Food Victoria Act 2026, is the state regulator. Your local council remains the day-to-day registration authority for premises, and classifies them on their highest-risk activity.

Does a Victorian Statement of Attainment expire?

The document itself does not lapse. The obligation is that your certification be no more than five years old under Standard 3.2.2A, which has the same practical effect. Worth knowing that Safe Food Victoria publishes no Victorian refresher period of its own, and says prior training does not usually need repeating — the five years reaches Victoria through the Code, applied by the Food Act 1984.

Is the WA provider list an approval scheme?

No. It is a convenience listing of self-notified providers. WA requires national registration, not WA approval, and a Statement of Attainment from any nationally registered RTO is valid there whether or not the provider appears on the list. A claim to be "WA-approved" describes a scheme that does not exist.

Can you issue the NSW FSS certificate?

No. We are not on the NSW Food Authority's approved RTO list, so we cannot issue the state FSS certificate. A NSW business needing that certificate must use a provider from the Food Authority's list, and should check the provider's Food Authority approval number as well as its national RTO code. We can still deliver SITXFSA005 for the NSW food handler obligation.

Do I need a USI?

For nationally recognised training, a USI is generally required before your qualification or Statement of Attainment can be issued, unless an applicable exemption applies. We can explain the requirements for your enrolment. See the official USI exemption guidance (<https://www.usi.gov.au/students/create-your-usi/exemptions-usi>). Creating a USI is free; recover an existing one rather than creating another.