



Applying for a Food Business Registration

You can picture it now! Your life as a Primalista! A Primal Alternative apron with your name and state on it! You're getting excited about approaching markets and stockists and busy calculating how much you will be able to earn as a Primalista working from the comfort of your home.

But before you get carried away, there is one administration process that needs to be complete before you can become a Primalista and that is gaining a **Certificate of Registration of a Food Business** from your local council.

You must have this **registration** if you intend to operate a permanent or temporary **food business**. A **food business** is a **business**, enterprise or activity that involves the handling of **food** intended for sale or the sale of **food** (e.g. cafe, restaurant, bakery, market **food** stall, etc).

And eek it is actually an offence to conduct a food business (be a Primalista) at any premises unless the food business (that's you) is registered with the appropriate enforcement agency (your council).

It's doable – but it is a process!

At the time of writing, fifty Primalistas have applied to their local council for a Food Business Registration across all states & Territories except Northern Territory to produce the Primal Alternative range and only one has been refused. This was in Hervey Bay in Queensland. There are a few versions of the Food Act. Each state has its own interpretation of it. Each council has its own interpretation of that and then each Environmental Health Officer (EHO) has their own interpretation of that too.

Quirky Cooking Grain-Free Pastry

To be honest, what we are doing is well weird! We are making products that are called “Bread” but yet not bread at all! This isn’t wheat and water, it is nuts, seeds, eggs and vegetables as a kind of pseudo bread! How confusing for our dear EHO’s! Then came the Quirky Cooking Grain-Free Pastry - super unique and I can guarantee your EHO will never have seen a recipe quite like this before.

Some EHO’s give the green light for the Pastry and other EHO’s don’t. Primal Alternative products are classed as ‘low risk’ because they are baked and ready to eat. The Grain-Free Pastry is raw and needs to be cooked before consumption. Some EHO’s are concerned about the water content of the pastry due to the cooked potatoes. So, some EHO’s won’t Primalistas to produce the pastry from home. This is OK and something I anticipated.

Collaborating with other Primalistas who can produce the pastry is one way to still be able to supply your stockists. Hiring a commercial kitchen with other Primalistas and splitting the hire cost is another potential solution. But stay tuned because there is more to come from the Primal Alternative offering as well as more Quirky Cooking products that you WILL be able to make from your home kitchen.

Cool – so how? How much and how long?

I wish I could compile a ‘how to’ for you but believe me when I say every council has a different process and it really does vary widely! Some councils are a quick inspection \$25 and a tick, but most councils require you to gain planning permission for a business from home first and then an application to the Environmental Health Officer.

Some EHO’s will conduct an inspection – some don’t. Some councils require you to do a Food Safety Supervisor Programme and/or a Food Handling Course. Some courses are in person and some are on line. Anything that you learn, even if it seems like a hassle now, will be really valuable in your new business and help you to grow.

Personalities and cooperation of EHO’s varies too, some may be more pedantic than others. Be sure to keep all your dealings with EHO’s, friendly, polite and concise and be sure to send them love and light when you are meditating!!!!

Oh – and if I had a dollar for every time a Potential Primalista said to me *“my council is notorious for being difficult!”* Everyone thinks the worst when it comes to council stuff. I encourage you to use compassion to look at this one. The EHO is doing a job to protect the public. I feel assured knowing that when I buy food, it has been made in a kitchen that is of a suitable standard – don’t you?

Also – I have had many a concerned message from customers seeking reassurance that we have some kind of standards when it comes to our kitchens. I love to be able to tell them that YES all of the Primalistas kitchens have been passed by their local council and this will be something you will be proud to share too. So, consider reframing it and say *“my council is so great to deal with”* and see what happens!

Time frames vary too, from a couple of days to weeks and into months – so this really needs to be the first thing on your list because a) it is totally the most tedious thing you will ever do as a Primalista and b) you can’t move forward without one.

Cost varies too from the \$25 I mentioned to around \$500. It is usually in a few payments, so once for planning and then for the inspection and then certificate. You will need to renew your certificate every year and there will be more inspections. Keep your receipts, this is a business expense and can be tax deductible.

Getting started

So, first things first – call up your council, ask to speak to an Environmental Health Officer and say, ***“I would like to register as a Food Business please. I would like to produce low risk baked breads, cookies and pizza bases as well as Gellies, which have similar ingredients to jam and also a pastry. I will be producing the range from my domestic kitchen. Can you please let me know what I need to do?”***

From there they will advise you of the process. To assist with your smooth sailing through Food Business registration as much as possible I have a draft letter here to use as part of your application, to help you with correct wording to help jolly things along!

Cut & Paste this letter!!

FAO: Environmental Health Officer.

Re: Food Business Registration

I would like to start the process of registration as a Food Business. I would like to produce low risk baked breads, cookies and pizza bases as well as Gellies, which have similar ingredients to jam and also a pastry. I will be producing the range from my domestic kitchen.

I want to make these products to help people in our community who have dietary restrictions and who are looking for grain free alternatives. I would love to be at Farmers Markets and to supply local health food shops, pizza shops, cafes and small supermarkets.

Below is the product range, ingredients and production method. The products will be packaged and sealed in plastic bags with labels that comply with Food Standards Australia Guidelines. The products will be sold and delivered at ambient temperature.

1.Fruit Toast water, tapioca flour, almond meal, sultanas, linseeds, sunflower kernels, goji berries /Inca berries, walnuts, cashew nuts, coconut oil, lemon juice, chia seeds, spices, baking powder, salt. Baked in a tin at 180 degrees for one hour.

2.Zucchini/Pumpkin Bread: almond meal, zucchini or pumpkin, eggs, tapioca, vinegar, bicarbonate of soda, salt. Baked in a tin at 180 degrees for 30 minutes.

3.Fat & Seedy Bread: almond meal, zucchini, eggs, pumpkin seeds, sunflower kernels, linseeds, sesame seeds, poppy seeds, sea salt. Baked in a tin at 180 degrees for 30 minutes.

4.Pizza bases: almond meal, tapioca flour, eggs, coconut oil, cashews, water, salt, baking powder. Baked on pizza trays at 180 degrees for 15 minutes.

5.Fat & Seedy Pizza Bases: almond meal, sunflower seeds, eggs, coconut oil, cashews, water sea salt, baking powder.

6.Choc Chip Cookies: butter, tapioca flour, almond meal, coconut, sugar, chocolate (cocoa mass, sugar, cocoa butter, natural bourbon vanilla bean), baking powder, salt. Baked on baking trays at 180 degrees for 15 minutes.

7.Gellies: lemon juice, gelatine, honey, beetroot powder, strawberry essence. Gellies are a Gelatine based confectionary alternative with ingredients like jelly or jam. Gellies are boiled at 100 degrees then cooled and set.

8.Grain-Free Pastry: almond meal, potato, tapioca flour, chia seeds, potato starch, olive oil, maple syrup, salt. The pastry is rolled, packaged and frozen and delivered in eskies.

Please advise me if there is anything further I can do to assist with my application. I appreciate your input and look forward to hearing from you soon.

Yours sincerely,

YOUR NAME
YOUR PHONE NUMBER

Pets

A few pet lovers freak out that they won't get council approval without ditching their furry pals but from my research the key is to keep pets and kids (lol) away from the kitchen in production time which is doable.

Refrigeration

The products do not need to be kept refrigerated by you before you take them to the markets or to stockists.

When to start my Food Business Registration?

Most Primalistas start their Food Business Registration AFTER they have signed up to become a Primalista. The timing of council coincides nicely with the time it will take for you to get set up as a Primalista (think tins, ingredients, insurance, labels etc) plus you will have the brains trust that is the Primalistas Facebook Group for any help you may need with your registration.

Good to know...

In the Franchise Agreement it says that if for some reason council say no you can't register as a Food Business then you can get your Franchise Fee back.

You got this!!

Good luck! I absolutely hope this little guide gives you some ease and grace. Be sure to ask for support in Potential Primalistas if you get stuck, there are others there who have done this and walked this path before you. I am here too for any help and advice so make sure you reach out.

Love, H xx

Potentially useful link:

I personally find Government websites a black hole where one can get lost for days. I also find things on state governments that don't reflect what's happening at local government level – so be sure to always call the council first. However, this is a link that may satisfy some of you avid researchers.

<https://www.foodsafety.com.au/resources/articles/everything-you-need-to-know-about-starting-a-food-business>

Here is a real-life example of information required by council. Remember that each council has variations of the same theme. I hope these answers (in red by me) help you with your application.

You can find the labels in the pinned post in Potential Primalistas and on the Primalista Log In Website.

From: "Forsyth, Lauren" <Lauren.Forsyth@wanneroo.wa.gov.au>

Date: 28 August 2017 at 12:34:03 AWST

To:

Subject: Further Information Required - Food Business and Notification Form - Primal Alternative by Caroline Lambie -

Hello Caroline,

I refer to your Food Business Notification and Registration Form proposing to operate a food business from a residential premise located at xxxx.

To further assess your application the following information is requested:

1. Floor Plan, including layout, elevations, equipment specifications and fittings

Do you have your house plans from when you built or moved in?

2. Sample Menu

Remember that PDF I did? This has the 'menu' which is council speak for our range.

3. A complete ingredients list and preparation method for each food PDF has this bit too

4. Copies of food labels where products are to be sold as packaged goods I will email you labels to use in your application

5. Food Recall procedures

We have a batch number and record stockists – so we can use these two bits of info for a

recall

6. Details of storage conditions for raw ingredients and finished product Plastic boxes and plastic bags both sealed

7. Details of how you will determine shelf life of each product (recommended to be done by NATA Accredited Laboratory)

We have determined a shelf life based on experience and have testing underway with a food laboratory

8. Details of cleaning and sanitising procedures

Washing hands, washing up, cleaning kitchen, hair nets, gloves for packing

9. Details of where the products will be sold **Markets and shops**

10. How the food will be transported

Bagged and boxed in a car – no refrigeration required

11. Copy of Public Liability Insurance Certificate of Currency **You are sorting this out with Chicken?**

You are also required to contact the City's Planning Implementation to determine if Development Approval is required to operate a food business from a residential premise. Planning Implementation can be contacted on 9405 5000.

Just give them a call. They need to make sure that your business isn't going to affect the neighbours. So be sure to say no food sold from home – no customers means no cars parked outside your house, and that you will bake during daytime in your kitchen – no noise pollution. I had to do planning permission.

Extra Stuff from H.

As each Primalista asks for assistance with their Food Business Registration I get more and more exposure to the different variations on a theme council has! I will keep adding to this document as I answer different queries, and I really hope you find the answers you need here!!

Food Recall:

We have devised a food recall procedure based on Food Standards Australia Guidelines. The Product Name, Batch number, best before date and retailers/markets are recorded for each batch.

Therefore, should we need to notify retailers or customers of a recall we know which products need recalling and where they are.

We record the ingredients from our supplier with Batch Numbers on our products so that if our supplier has a recall we know which products need recalling and where they are.

In the event of a food recalls we will take the following action to ensure unsafe food is quickly removed from the food supply chain:

1. Notify our customers and retailers by calling in or phoning them or using GS1 Recallnet (we have GS1 barcodes).
2. Notify the public by posting on our website, social media channels and Point of Sale Notifications at retailers.
3. Call the FSANZ Food Recall Coordinator on (02) 6271 2610 (9am-5pm Monday–Friday). If it is outside business hours and our recall needs to be actioned urgently, call 0412 166 965. At this stage FSANZ will need to know: the name and description of the food being recalled.

Why the food is being recalled. Which states/territories (or countries, if exported) the food has been sold in. What types of retail outlets the food has been sold from. Which state/territory the food was manufactured in (or country, if imported).

4. Make a record of all the product that was recalled.
5. Submit a post recall report to Food Standards Australia & New Zealand.
6. Refer to [How To Recall Food Page](#) on the Food Standards Australia & New Zealand Website.

Shelf Life:

Our range currently carries a best before date of 14 days after production. To avoid confusion, this means, if a Bread was baked today, the best before date would be 14 days from today.

We have successfully traded with this best before date across several states in Australia for over 18 months.

We have formal shelf life testing results for the Fruit Toast & Choc Chip Cookies which has a recommended shelf life of 2 weeks.