

2018-19 Annual report on local government activities under the Food Act 2006

October 2020



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An electronic version of this document is available at <https://www.health.qld.gov.au/public-health/industry-environment/food-safety/resources>

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Summary

In relation to reportable elements of the food regulatory system in Queensland, the *2018-19 Annual report on local government activities under the Food Act 2006* presents:

- statistical information on annual activities for each local government
- consolidated information by region
- an examination of trends for standard parameters since 2011-12.

Highlights from 2018–19 reporting period

- The number of licensed food businesses in Queensland was 31,296 representing a 2.4% increase from the previous reporting period. About two thirds (67%) of these businesses are from the Brisbane and Moreton region.
- 94.1% of licensed food businesses have a nominated food safety supervisor, compared to 95.3% in the 2017-18 reporting period. This statistic does not include data from the City of Gold Coast which could not be provided due to the introduction of a new information technology system by this local government.
- The statewide percentage of licensed food businesses who require and have an accredited food safety program is 99%. This is a marked increase from the previous report where only 86.6% were accredited.
- A total of 35,710 inspections were conducted in the 2018-19 reporting period. Licensed food businesses were inspected an average of 1.1 times per year, which is consistent with previous years.
- A total of 3,169 complaints were received by local governments regarding Queensland food businesses, representing a 4.8% decrease from the previous year.
- The total number of employees committed to food regulation is 0.6 persons per 100 licensed food businesses. This statistic has been consistently reported since 2011-12.
- 46% of local governments reported that they use contractors to perform some food regulation tasks.
- Enforcement activities showed a:
 - 14.2% decrease in improvement notices issued
 - 5.4% decrease in prescribed infringement notices (PINs) issued
 - 22.7% increase in the number of prosecutions undertaken by local governments
 - 61.1% decrease in immediate licence suspensions.

1 Introduction

The *Food Act 2006* (the Act) is the primary food safety legislation in Queensland and applies to Queensland food businesses (excluding public hospitals, state schools, prisons and other State food businesses). The objectives of the Act are to ensure food for sale is safe and suitable for human consumption, to prevent misleading conduct in relation to the sale of food and to apply the *Australia New Zealand Food Standards Code* (the Food Standards Code).

The Department of Health (the Department), Hospital and Health Service Public Health Units (PHUs) and local government are responsible for enforcing compliance with the Act. As such, these agencies are accountable to the community for ensuring that acceptable food safety standards are being achieved by food businesses.

In Queensland, local governments are responsible for licensing food businesses, routine inspections and enforcement of food safety standards in retail, manufacture and food service sectors, complaint investigations relating to a food business, collaboration on foodborne illness investigations and accrediting food safety programs for certain high-risk food businesses under the Act. Local government have responsibility for enforcing specified offence provisions of the Act and Chapter 3 – Food Safety Standards of the Food Standards Code

Section 28 of the Act allows the Department to request information from local government relating to the administration and enforcement of the Act. As a partner in the administration of the Act, section 29 enables the Department to provide a report on the administration of the Act to local government.

Since 2010, the Department has collected information annually from local government about the key services they provide in relation to the Act. To foster transparency of governance, the subsequent report is published on the Queensland Health website.

The information regarding food regulatory activities provided to the Department by local government contributes directly to the development and overall administration of the Act and informs the status of food safety in Queensland. In turn, this information allows the Department to respond to requests and enquiries from the Minister for Health and Minister for Ambulance Services, the Director General or appropriate Commonwealth agencies.

2 Regions and local governments

There are 77 local governments and the Weipa Town Authority¹ in Queensland, which is included as a local government for the purposes of this report.

To align with previous local government reports, the data for the 2018–19 reporting period has been grouped into nine geographical areas. These are based on the local government regions used by the Australian Bureau of Statistics (Table 1).

Table 1 Local government regions

Region	Local governments
Brisbane and Moreton	Brisbane, Gold Coast, Ipswich, Lockyer Valley, Logan, Moreton Bay, Noosa, Redland, Scenic Rim, Somerset and Sunshine Coast
Mackay and Fitzroy	Central Highlands, Gladstone, Isaac, Livingstone, Mackay, Rockhampton and Woorabinda
Wide Bay Burnett	Banana, Bundaberg, Cherbourg, Fraser Coast, Gympie, North Burnett and South Burnett
Far North	Aurukun, Cairns, Cassowary Coast, Cook, Croydon, Douglas, Etheridge, Hope Vale, Lockhart River, Mapoon, Mareeba, Napranum, Northern Peninsula, Pormpuraaw, Tablelands, Torres, Torres Strait Islands, Weipa, Wujul and Yarrabah
Northern	Burdekin, Charters Towers, Hinchinbrook, Palm Island, Townsville and Whitsunday
Darling Downs	Goondiwindi, Southern Downs, Toowoomba and Western Downs
North West	Burke, Carpentaria, Cloncurry, Doomadgee, Flinders, Kowanyama, McKinlay, Mornington, Mt Isa and Richmond
South West	Balonne, Bulloo, Maranoa, Murweh, Paroo and Quilpie
Central West	Barcaldine, Barcoo, Blackall-Tambo, Boulia, Diamantina, Longreach and Winton

A map of the nine geographical areas is provided in Appendix 1, with a more detailed map of individual local government boundaries provided in Appendix 2.

¹ Rio Tinto is responsible for the administration of the town of Weipa which it carries out through the Weipa Town Authority (WTA). The WTA acts in the role of a Local Authority, with staff that would normally be associated with a local government.

3 Requesting information

The Department provided a notice under section 28 of the Act to all local governments, requiring information regarding activities undertaken in the administration of the Act for the period 1 July 2018 to 30 June 2019. A copy of the Local government request form (request form) for 2018-19 is included as Appendix 3.

Two sets of data, standing parameters and annual parameters, are collected each year. Standing parameters are a core group of questions consistent with previous reporting periods, which provide a level of consistency in the data collected across reporting periods and allowing statewide trend analysis to be undertaken. Annual parameters result from questions about contemporaneous issues, such as those raised by local government with the Department or which affect national food safety policy decisions or work being undertaken by national bodies. Annual parameters may differ between reporting periods, and may, or may not, be included in the Report.

For the 2018-19 reporting period, four additional questions were included in the request form to obtain information about how local governments use information technology and data capture to monitor and enforce the Act (Appendix 3). This information will be used to inform and contribute to work relating to the use of technology to support consistent management of food safety as outlined in the Queensland Audit Office findings into *Managing consumer food safety in Queensland* (tabled in Parliament on 14 May 2019). It has not been reported on in this Report. Information about risk-based profiling of food businesses, handling of raw and partly cooked eggs and egg products, and food safety education and training was obtained in 2017-18 but not in 2018-19.

To reduce the number of requests for data from local government, the request form also included information regarding mobile food businesses. This information has been collated and a register of mobile food premises is available at www.publications.qld.gov.au/dataset/mobile-food-premises.

4 Considerations and limitations of the report

This report provides data on the activities of local government for the 2018-19 financial year. It is not a performance review of local governments across Queensland in the administration of the Act.

- The data in this report is presented by geographical regions defined by the Australian Bureau of Statistics. Across the State, there is major variation in population density and distribution, distribution of food establishments, capacity of local governments and other factors which limit regional comparisons. For example, the Brisbane and Moreton region captures data from six of the largest and most densely populated areas of Queensland.
- Data provided in this report is not used as the single measure for performance by local government in the administration of the Act.
- Targeted compliance and regulatory actions undertaken by local governments are determined by local priorities and are not prescribed by the State. This provides local government with the discretion to target regulatory compliance activities within their boundaries and contributes to the variation in food safety compliance activities between local governments.

- The Act does not bind the Crown. Therefore, food businesses in State government facilities, such as schools, prisons and hospitals, are not regulated by local government and are not captured in this report.
- Whilst this report provides activity data on select types of regulatory action undertaken by local government, it does not include a full range of strategies and tools (such as voluntary food safety training) regulators may use to assist and engage with food businesses to achieve and maintain food safety compliance with the Act.
- Some businesses or activities are not licensable under the Act, including:
 - businesses selling only pre-packaged food
 - the sale of whole fruit and vegetables or drinks such as tea, coffee, soft drink and alcoholic beverages
 - primary producers of eggs, dairy, meat and seafood that are accredited by Safe Food Production Queensland under the *Food Production (Safety) Act 2000*.

Businesses not required to hold a licence are not captured by this report.

- The methodology for collecting the data consists of a self-reporting survey that may be subject to misclassification or user error. While every care has been taken to clarify potential data discrepancies, some errors may not be easily identified and may therefore remain.

5 Results

Queensland's population is clustered around the cities and coastlines. Less than 5% of the population live in remote and very remote areas, and over half of the Queensland population live in major cities². This pattern is reflected in the activities reported by the regions.

A summary of the 2018–19 regional results for the standard parameters is presented in Table 2 and is discussed within the relevant sections of the report. Individual local government data for 2018–19 is provided in Appendix 4.

² Australian Bureau of Statistics. *Regional population growth, Australia*, cat. No. 3218.0. ABS: Canberra; 2016

Table 2 Regional results for standard parameters in 2018–19

Region	Licensed food businesses	Average inspections per food business	Food businesses with a food safety supervisor	Food businesses requiring a FSP with a FSP	Improvement notices issued	PINs	Prosecutions	FTE employee committed to food regulation
Brisbane & Moreton	21,085	1.1	14,323	1,650	2,168	417	54	94.6
Mackay & Fitzroy	2,011	1.3	1,739	89	83	8	0	18.3
Wide Bay Burnett	1,811	0.9	1,667	109	45	1	0	13.7
Far North	2,311	1.5	2,290	148	71	17	0	15.2
Northern	1,711	1.2	1,693	114	372	15	0	8.2
Darling Downs	1,645	1.2	1,541	127	226	45	0	9.7
North West	234	1.5	233	23	18	8	0	7.2
South West	321	0.7	321	11	1	0	0	2.5
Central West	167	1.7	167	4	1	0	0	3.2
Total	31,296	1.1	23,974	2,275	2,985	511	54	172.6

5.1 Licensed food businesses

Certain food businesses are required to be licensed by local government under the Act, including:

- food manufacturers (e.g. manufacturers of bakery products)
- food businesses selling unpackaged food by retail (e.g. restaurant or catering business)
- non-profit organisations that sell meals on at least twelve occasions in a year (e.g. Meals on Wheels).

During the 2018–19 reporting period there were **31,296** licensed food businesses in Queensland. This is an **increase of 727 (2.4%)** licensed food businesses from the previous reporting period.

The geographical prevalence of licensed food businesses in Queensland is consistent with the population of each region, and is identified in Figure 1 in descending order:

- Brisbane and Moreton 67% (21,085) of licensed food businesses
- Far North 7% (2,311)
- Mackay and Fitzroy 6% (2,011)
- Wide Bay Burnett 6% (1,811)
- Northern 5% (1,711)
- Darling Downs 5% (1,645)
- South West 1% (321)
- North West 1% (234)
- Central West 1% (167)

Figure 1 Geographical prevalence of licensed food businesses in Queensland

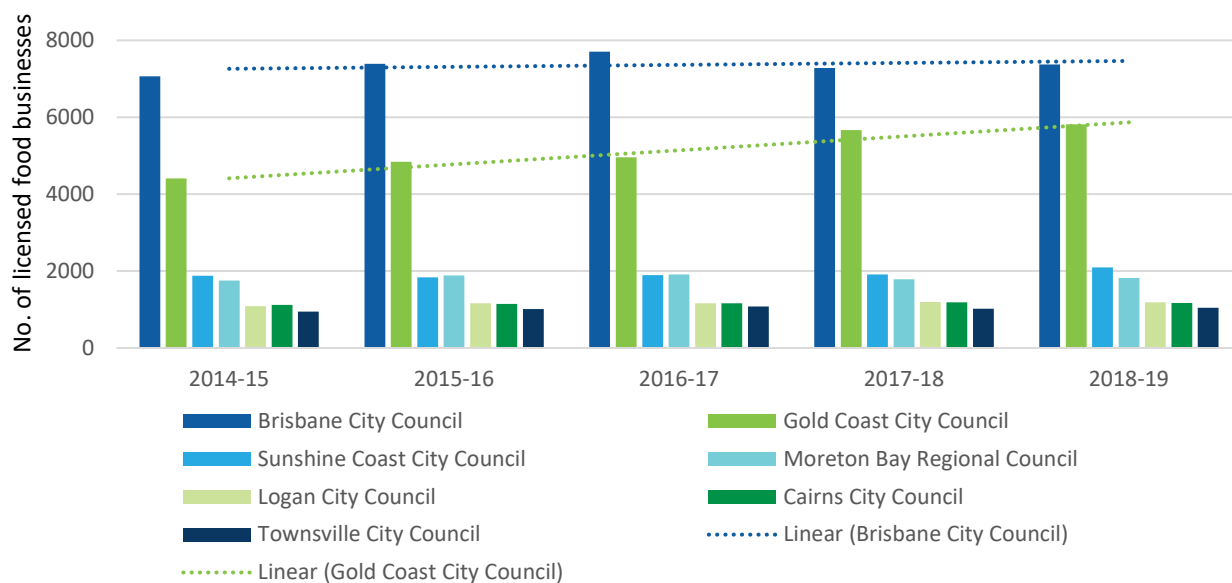


Seven local governments reported that they had zero licensed food businesses. This is a decrease from the previous two reporting periods where 11 local governments reported having no licensed food businesses. This decrease could be attributed to several factors, including an increase in the capacity of regional councils to licence businesses as well as population growth in these areas.

Changes in the number of licensed food businesses, for the seven local governments that have more than 1,000 licensed food businesses within their jurisdiction, are shown in Figure 2. There has been little change in the ranking of these local governments over the reporting periods. This is largely a reflection of location and population density, with the top five local governments located within the Brisbane and Moreton region of South East Queensland. Cairns and Townsville city councils ranked 6th and 7th. The City of Gold Coast has continued to see steady growth in the number of licensed food businesses, following a spike leading up to the 2018 Commonwealth Games.

Figure 3 shows how the number of licensed food businesses in Queensland has increased since 2010. Between 2010 and 2018-19, there was a 30% increase in the number of licensed food businesses in Queensland, and a 38% increase the Brisbane and Moreton region.

Figure 2 Change in numbers of businesses in local government areas having more than 1,000 licensed food businesses

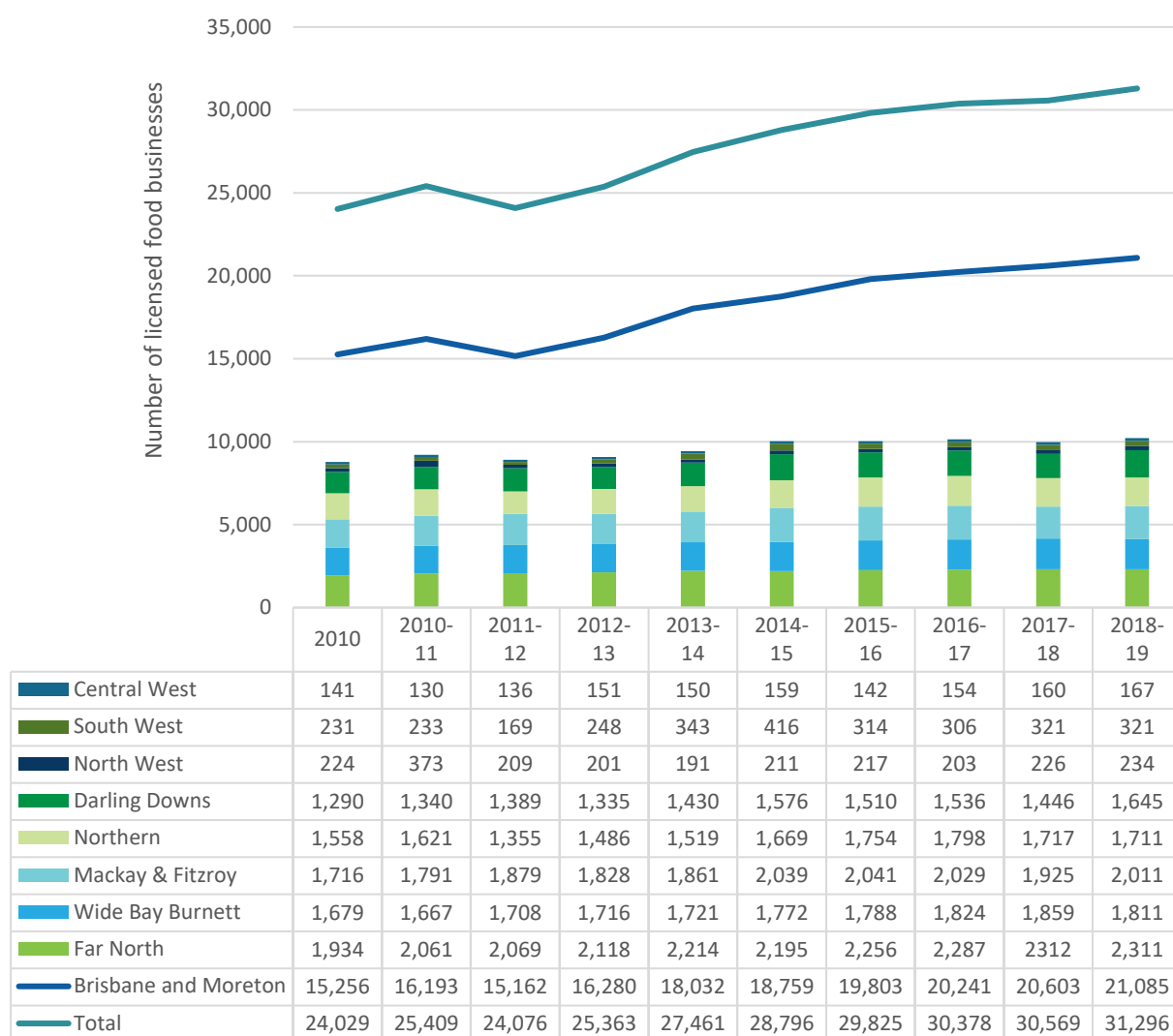


5.1.1 License categories

The Department acknowledges that at times local government have competing priorities which may result from staffing shortfalls, political interests and responsibility for numerous pieces of legislation. Classifying food businesses allows local government to prioritise food safety tasks such as inspections which can assist with planning and ensure that adequate resources are available.

Local governments were asked to provide information on license categories. Of the 61 local governments that had more than one food business, 21 used categories based on business type (e.g. café/restaurant, manufacturer and child care centre), seven used simple risk-based categories (e.g. low, medium and high), four used a combination of risk and function (e.g. temporary, mobile or fixed premises), four used function categories, six used another categorisation method and 19 reported not using license categories. As in 2018-19, the most common systems used to categorise licenses were based on business type and risk.

Figure 3 Number of licensed food businesses in Queensland for reporting periods 2010 to 2018-19



5.2 Food safety supervisors

Section 86 of the Act requires licensable food businesses to have at least one nominated food safety supervisor. Food safety supervisors provide an important role in food businesses and must know how to recognise, prevent and alleviate food safety hazards. They must have skills and knowledge in matters relating to food safety relevant to the food business and have the authority to supervise and give directions about matters relating to food safety to persons who handle food in the food business. Anyone who meets these requirements may be a food safety supervisor, which may include the business owner, the licensee, a manager, employee or a contractor.

In 2018–19 it was reported that **23,974** (77%) licensed food businesses had a nominated food safety supervisor. However, for the second year in a row, one of the largest local governments, City of Gold Coast, was unable to provide this data due to the introduction of a new information technology system. This has had a major impact on results for both the Brisbane and Moreton region and the state. After removing the Gold Coast licensed food businesses from the calculations to allow for this anomaly, the overall compliance with the food safety supervisor provisions was 94.1%. This is a slight (1.2%) decrease from the previous reporting period.

For the second consecutive year, the Central West region reported that 100% of licensed food businesses had a nominated food safety supervisor. The South West region also reported a 100% compliance rate for food safety supervisors in 2018-19. Table 3 shows the 2018-19 food safety supervisor data for each region, compared to the previous reporting period.

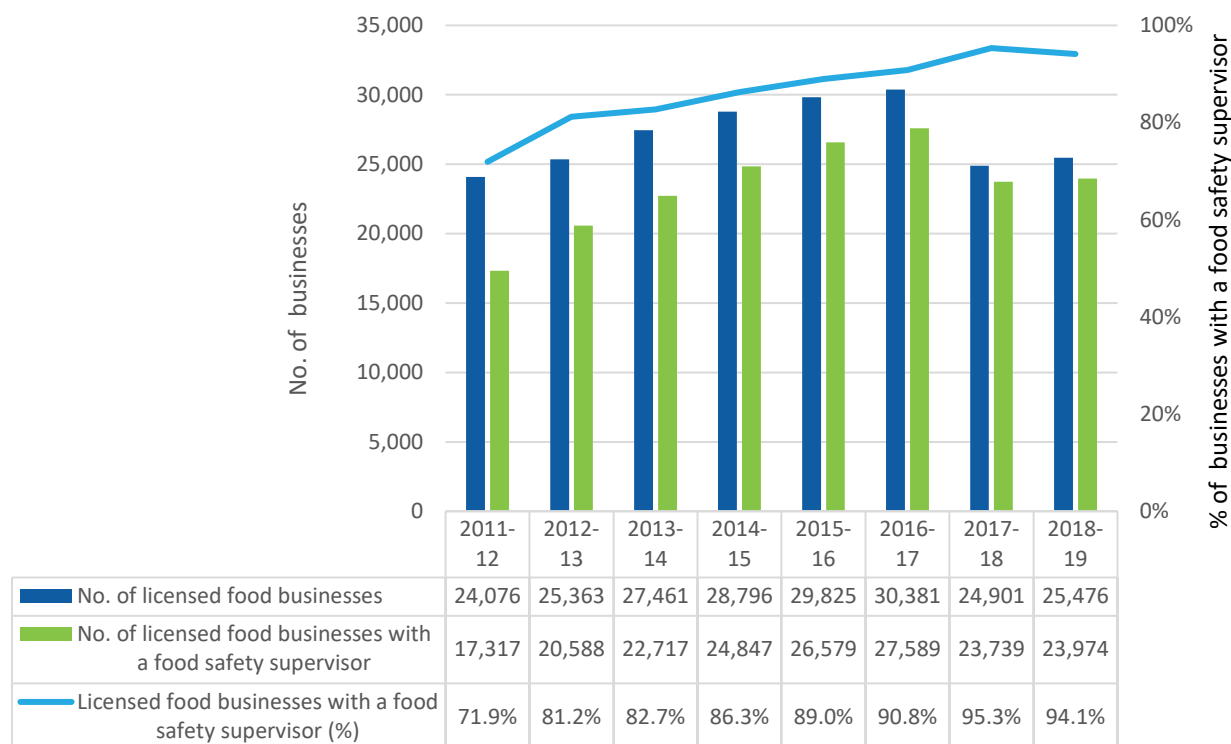
Table 3 Food safety supervisor data

Region	2018 – 19			2017 – 18
	Licensed food businesses	Businesses with food safety supervisor	% businesses with a food safety supervisor	% businesses with food safety supervisor
Brisbane & Moreton*	15,265	14,323	93.8	96
Mackay & Fitzroy	2,011	1,739	86.5	89.1
Wide Bay Burnett	1,811	1,667	92.0	88.6
Far North	2,311	2,290	99.1	99.8
Northern	1,711	1,693	98.9	97.1
Darling Downs	1,645	1,541	93.7	93.5
North West	234	233	99.6	100.0
South West	321	321	100.0	99.4
Central West	167	167	100.0	100.0
Total	25,476	23,974	94.1%	95.3%

* Brisbane and Moreton region without the inclusion of the City of Gold Coast statistics

Since 2011 – 12, there has been a steady increase in the number of licensed food businesses with a food safety supervisor (Figure 4). This can be contributed to the continued efforts of the environmental health workforce and improved interpretative guidance and education by local governments and Queensland Health.

Figure 4 Food safety supervisors in licensed food businesses for reporting periods 2011-12 to 2018-19



Statistics for the City of Gold Coast were not included in 2017-18 and 2018-19 data

5.3 Food safety programs

The introduction of food safety programs for certain sectors of the food industry was part of a national review and assessment which aimed to reduce the incidence of foodborne illness, reduce regulatory burden on the food industry and provide consistent food regulation and standards across Australia.

Under the Act, certain high-risk licensed food businesses are required to have a food safety program accredited by their local government if:

- the food business involves off-site catering
- the primary activity of the food business is on-site catering
- the food business is undertaken as part of the operation of a private hospital or otherwise processes or serves potentially hazardous food to six or more vulnerable persons.

A regional overview of the number of licensed food businesses requiring a food safety program, compared to the number that have been accredited by local government, is provided in Table 4. Results show that only three regions reported an increase in the number of food businesses requiring a food safety program (Brisbane and Moreton, Far North and Darling Downs). Five local governments reported a decrease in the number of businesses requiring a food safety program. This is a stark change from the previous reporting period and has a considerable impact on the compliance rate for the state.

Table 4 Regional food safety program data for the 2018–19 and 2017–18 reporting periods

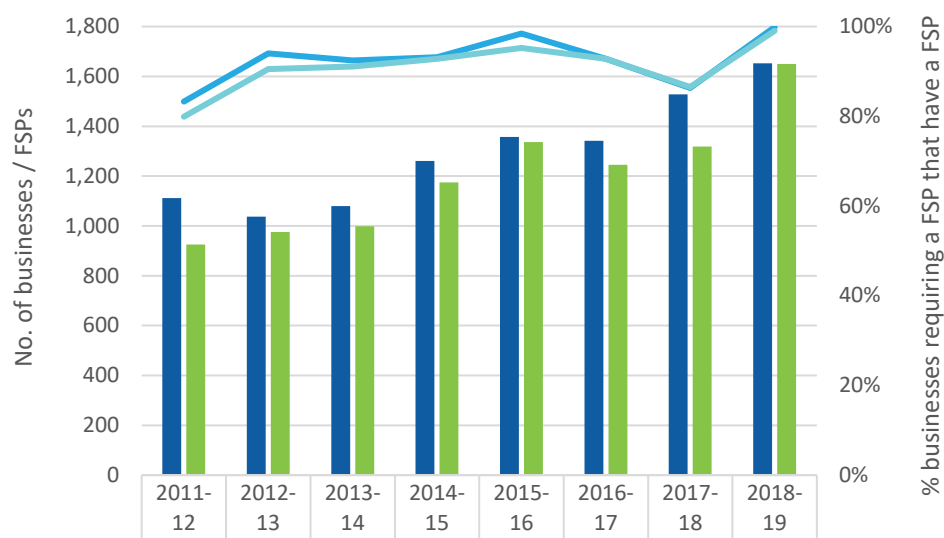
Region	2018-19			2017-18		
	Licensed food business requiring a FSP	Accredited FSP	% businesses requiring a FSP, with accredited FSP	Licensed food business requiring a FSP	Accredited FSP	% businesses requiring a FSP, with accredited FSP
Brisbane & Moreton	1,652	1,650	99.9	1,528	1,319	86.3
Mackay & Fitzroy	90	89	98.9	145	121	83.4
Wide Bay Burnett	114	109	95.6	137	107	78.1
Far North	153	148	96.7	136	133	97.8
Northern	119	114	95.8	123	105	85.4
Darling Downs	127	127	100	108	106	98.1
North West	25	23	92	25	18	72.0
South West	12	11	91.7	23	17	73.9
Central West	5	4	80	6	5	83.3
Total	2,297	2,275	99	2,231	1,931	86.6

The Brisbane and Moreton region have seen a marked improvement in their compliance rate despite reporting an increase in the number of food businesses that require a food safety program (Figure 5). The improvement is primarily due to the increased compliance rate of food businesses in the Brisbane City Council area, which increased from 77% in 2017-18 to 99.8% in 2018-19. The remaining local governments in the Brisbane and Moreton region have maintained their high compliance status with food safety programs.

Whilst the number of licensed food businesses requiring a food safety program decreased substantially in Mackay and Fitzroy, Wide Bay Burnett and South West regions, the number of accredited food safety programs did not decrease to the same extent.

Figure 5 indicates that compliance rates for licensed food businesses requiring a food safety program that have a food safety program in Queensland reflect the Brisbane and Moreton regional statistics, due to the high numbers of these businesses in this region.

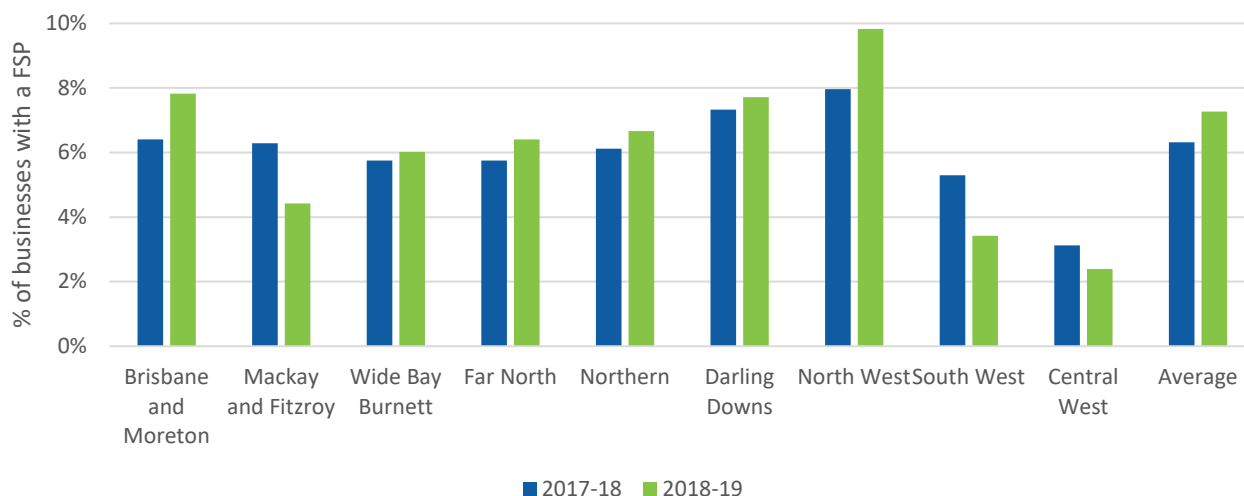
Figure 5 Number of licensed food businesses requiring food safety programs (FSPs) that have FSPs, in the Brisbane and Moreton region and Queensland, for reporting periods 2011-12 to 2018-19



	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
No. of licensed food businesses requiring a FSP in Brisbane & Moreton region	1,112	1,037	1,080	1,261	1,357	1,342	1,528	1,652
No. of accredited FSPs in Brisbane & Moreton region	926	975	998	1,175	1,336	1,245	1,319	1,650
% of businesses requiring a FSP that have a FSP in Brisbane & Moreton region	83.3%	94.0%	92.4%	93.2%	98.5%	92.8%	86.3%	99.9%
% of businesses requiring a FSP that have a FSP statewide	79.9%	90.5%	91.1%	92.8%	95.2%	92.8%	86.6%	99.0%

On average, 7.3% of licensed food businesses in Queensland have an accredited food safety program, ranging from 2.4% in the Central West region to 9.8% in the North West region (Figure 6). This compares with an average of 6.3% for the previous reporting period.

Figure 6 Licensed food businesses with accredited food safety programs (FSPs) in 2017-18 and 2018-19



5.4 Food business inspections

Local governments inspect licensed food businesses to assess compliance with the Food Safety Standards (Chapter 3 of the Food Standards Code) and the licence conditions of the food businesses pursuant to the Act. The Act does not specify the frequency of inspections. Local governments conduct routine inspections based on factors such as the risk category of the food business (e.g. high, medium or low) and the compliance history of the business. The frequency of inspections may provide an indication of a local government’s capacity to assess compliance of a food business with their legislative requirements in relation to food safety.

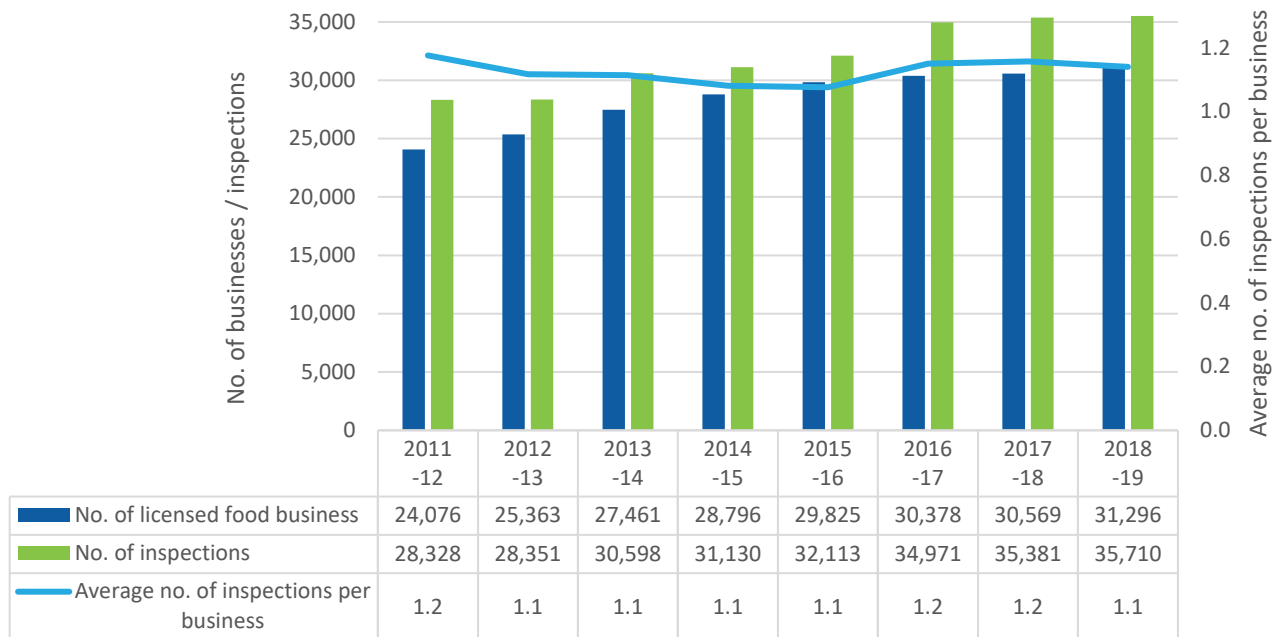
Statewide, a total of **35,710** inspections were reported in the 2018–19 period (Table 5). Licensed food businesses were inspected on average **1.1** times per year, which includes follow up and complaint inspections. This is consistent with the data provided last year.

For the 2018–19 reporting period, two regions (Wide Bay Burnett and South West) recorded inspection rates of less than 1 inspection per food business. Four local governments (Kowanyama, Pormpuraaw, Woorabinda and Wujul Wujul) with licensed food businesses reported that no inspections were conducted within the reporting period. Collectively these local governments only have five licensed food businesses and due to limited staffing capacity, local PHUs provide regulatory oversight for these local governments. Figure 7 indicates that the number of inspections per licensed food business has remained at between 1.1 and 1.2 over all reporting periods between 2011-2012 and 2018-2019.

Table 5 Regional food business inspection data

Region	2018-19			2017-18		
	Licensed food businesses	Total inspections	Inspections per food business	Licensed food businesses	Total inspections	Inspection per food business
Brisbane & Moreton	21,085	23,074	1.1	20,603	23,230	1.1
Mackay & Fitzroy	2,011	2,550	1.3	1,925	1,950	1.0
Wide Bay Burnett	1,811	1,606	0.9	1,859	1,992	1.1
Far North	2,311	3,554	1.5	2,312	3,151	1.4
Northern	1,711	2,119	1.2	1,717	2,005	1.2
Darling Downs	1,645	1,961	1.2	1,446	2,196	1.5
North West	234	348	1.5	226	362	1.6
South West	321	216	0.7	321	265	0.8
Central West	167	282	1.7	160	230	1.4
Total	31,296	35,710	1.1	30,569	35,381	1.2

Figure 7 Average number of inspections per licensed food business In Queensland for reporting periods 2011-12 to 2018-19

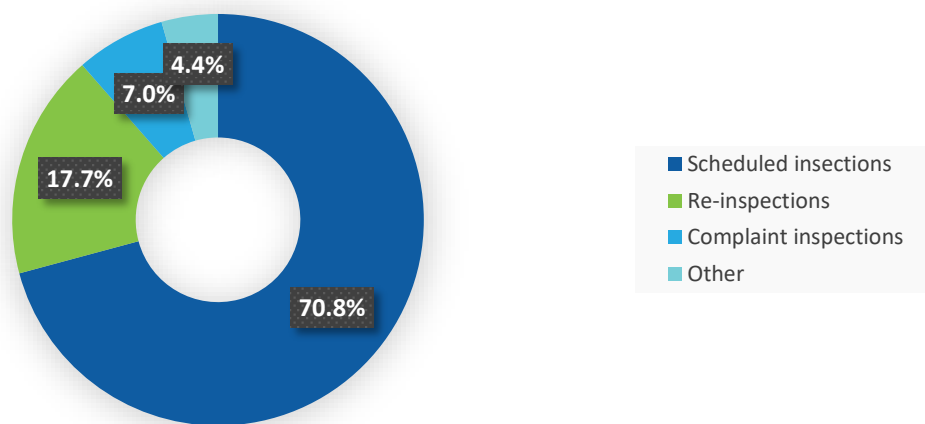


5.4.1 Inspection categories

Local government were requested to categorise inspections as routine or scheduled, follow-up or re-inspection and complaint inspections. Figure 8 shows that in 2018-19:

- 70.8% of inspections were scheduled or routine
- 17.7% were follow-up or re-inspections
- 7.0% of inspections were the result of a complaint
- 4.4% of inspections were for other reasons, which may include license approval or change of ownership.

Figure 8 Types of inspection undertaken in Queensland in 2018-19



Numbers and type of inspections, other than those for which a reason was not given, undertaken in Queensland during 2018–19 are shown in Table 6.

Table 6 Numbers and type of inspections undertaken in Queensland in 2018-19

Region	Total inspections	Scheduled inspections		Re-inspections		Complaint inspections	
		Number	%	Number	%	Number	%
Brisbane & Moreton	23,074	15,479	67.1%	3,943	17.1%	2,157	9.3
Mackay & Fitzroy	2,550	1,942	76.2%	458	18.0%	84	3.3
Wide Bay Burnett	1,606	1,353	84.2%	203	12.6%	50	3.1
Far North	3,554	2,742	77.2%	677	19.0%	117	3.3
Northern	2,119	1,460	68.9%	628	29.6%	31	1.5
Darling Downs	1,961	1,622	82.7%	280	14.3%	59	3.0
North West	348	323	92.8%	20	5.7%	5	1.4
South West	216	186	86.1%	22	10.2%	8	3.7
Central West	282	179	63.5%	99	35.1%	2	0.7
Total	35,710	25,286	70.8%	6,330	17.7%	2,513	7.0

A total of 34 (43.5%) local governments, mainly in Far North, North West, South West and Central West regions, reported that they did not conduct any complaint inspections. A total of 22 (28%) local governments, reported they did not undertake any follow-up or re-inspections. These results are consistent with previous years.

5.5 Complaints

Local government receive a variety of complaints from the public regarding unsafe practices at food businesses or regarding food purchased. Some examples of complaints include dirty or unhygienic food premises, undercooked food, poor food handling practices, vermin or animals in a food premises and alleged foodborne illnesses. The number and type of complaints received can vary greatly.

Local governments were requested to provide the total number of complaints about food businesses that they received during the reporting period. They were not asked to categorise these complaints due to the complexities associated with varying data collection methodologies within individual local governments. Data relating to complaints received in the 2018–19 and 2017-18 reporting periods are shown in Table 7.

Table 7 Regional complaints about food businesses

Region	2018-2019		2017-18	
	Licensed food businesses	Total complaints	Licensed food businesses	Total complaints
Brisbane & Moreton	21,085	2,303	20,603	2,517
Mackay & Fitzroy	2,011	237	1,925	182
Wide Bay Burnett	1,811	146	1,859	152
Far North	2,311	178	2,312	158
Northern	1,711	162	1,717	191
Darling Downs	1,645	123	1,446	99
North West	234	10	226	9
South West	321	8	321	8
Central West	167	2	160	13
Total	31,296	3,169	30,569	3,329

A total of **3,169** complaints were received across Queensland in 2018-19, which is a 4.8% decrease from the previous year. This is the third year in a row that the number of complaints has decreased, despite the number of licensed food businesses increasing. About three quarters of all complaints (2,303) were recorded for the Brisbane and Moreton region. Brisbane City Council received the highest number of complaints at 865, or 12 complaints per 100 licensed food businesses. Eleven complaints per 100 licensed food businesses were reported for 2017-2018.

Logan City Council received the second highest number of complaints with 496, or 42 complaints per 100 food businesses. In 2017-2018 the rate was 48. The system used by Logan City Council does not differentiate between a complaint and a general food business enquiry. They estimate that approximately half of these reported complaints are in fact enquiries which adjusts their complaint rating to about 20 complaints per 100 licensed food businesses. While still higher than other local governments, further discussion with Logan City Council officers attributed this outcome to the high level of cultural diversity within their jurisdiction, resulting in many businesses being unaware of their requirements and residents seeking advice.

Between 4 and 13 complaints per 100 licensed food businesses were reported by the five other local governments that have more than 1,000 licensed food businesses (Table 8). It is unclear what is causing this variation.

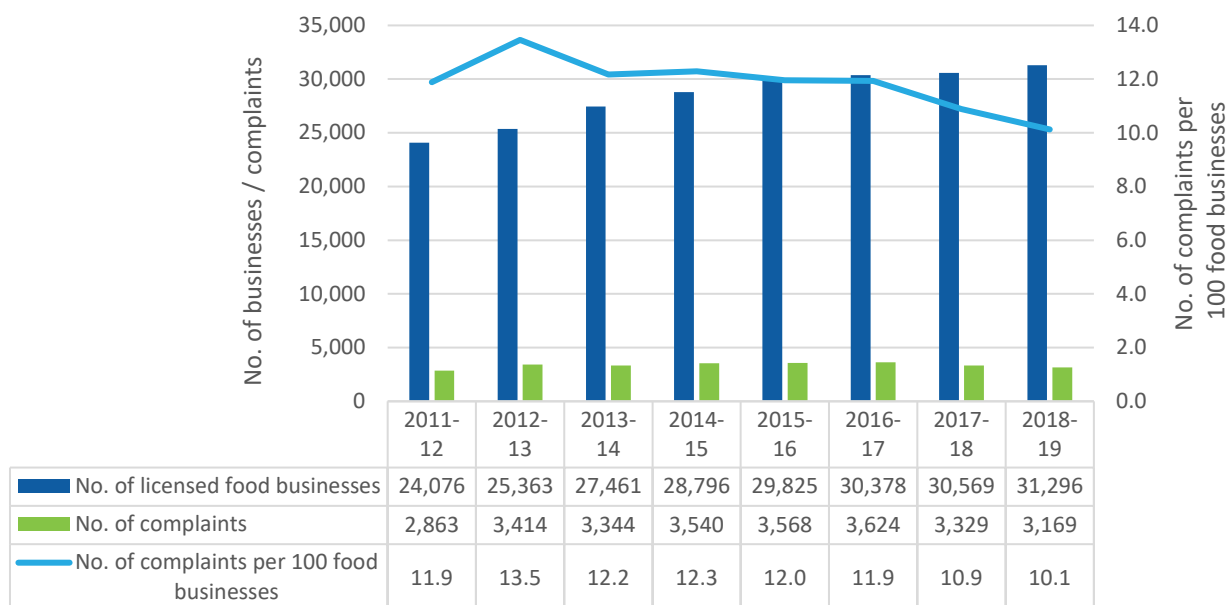
A total of 34 local governments (43.6%) reported that they did not receive any food complaints in the 2018-19 reporting period, which is an increase of 5.6% from the previous report. These local governments are in rural or remote areas, with low numbers, or no, licensed food businesses.

Each year in Queensland more than 3,000 complaints are received about food businesses, although a decline has been occurring since the 2016–17 reporting period (Figure 9). This decline may be attributed to several factors including improved food safety compliance levels and better community education resulting in a reduction in unsubstantiated complaints.

Table 8 Number of food business complaints in seven local governments with more than 1,000 licensed food businesses in 2018-18

Local government	Licensed food businesses	Total complaints	
		Number	%
Brisbane	7374	865	11.7
Gold Coast	5820	458	7.9
Sunshine Coast	2099	93	4.4
Moreton Bay	1860	173	9.3
Logan	1186	496	41.8
Cairns	1170	111	9.5
Townsville	1045	137	13.1

Figure 9 Number of complaints per 100 licensed food businesses in Queensland for reporting periods 2011-12 to 2018-19



5.6 Employees in food regulation

Most local government employees working in food regulation are environmental health officers (EHOs). It is important to note that EHOs are responsible for many areas in addition to food regulation, particularly those in rural and remote locations.

In some rural and remote areas, food regulation is carried out by contract EHOs employed on an as-needs basis. In some of the Indigenous communities, environmental health workers (EHWs) may fulfil this function as part of their duties. To support Indigenous local governments and build the skills of EHWs, EHOs from local PHUs support EHWs by providing advice on food safety issues and inspecting food businesses operating within the area.

While it is common in rural and remote areas for local governments to engage contractors, larger local governments also utilise contractors to backfill permanent staff, undertake targeted enforcement or to complete compliance activities for projects or during busy times.

Table 9 shows the number of full-time equivalent (FTE) employees committed to food regulation for 2018-19 in each region. It should be noted that interpretation of this question in the report form has been mixed and therefore the numbers of FTEs committed to food might be different than what is presented in the table.

Table 9 Employees committed to food regulation per region

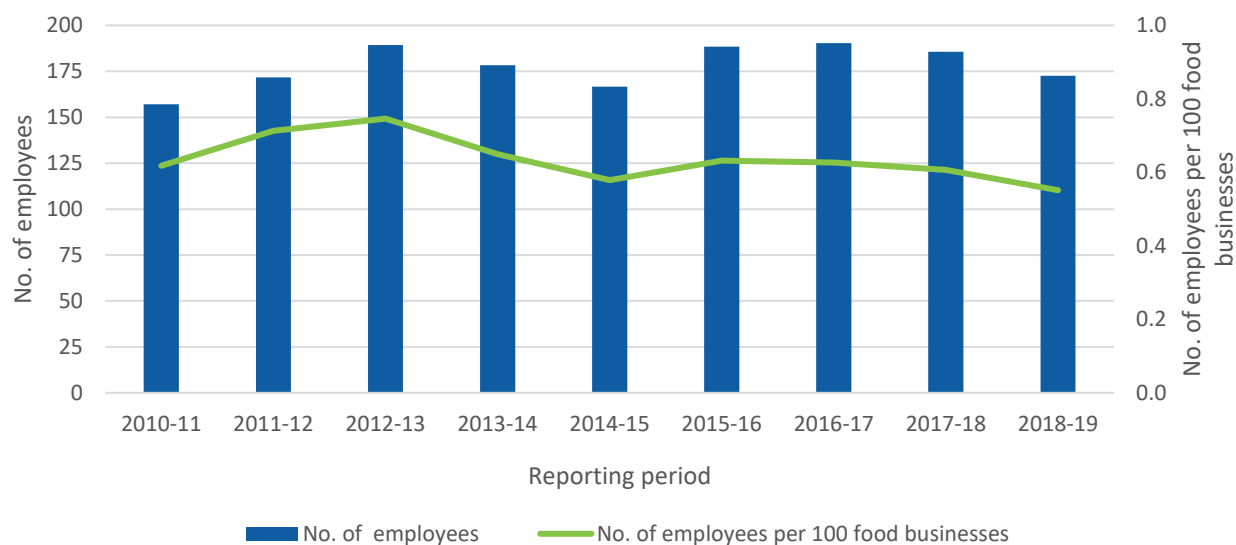
Region	2018-19			2017-18	
	Licensed food businesses	Employees committed to food regulation	Employees per 100 food businesses	Employees committed to food regulation	Employees per 100 food businesses
Brisbane & Moreton	21,085	94.6	0.4	98.7	0.5
Mackay & Fitzroy	2,011	18.3	0.9	15.2	0.8
Wide Bay Burnett	1,811	13.7	0.8	14.3	0.8
Far North	2,311	15.2	0.7	17.8	0.8
Northern	1,711	8.2	0.5	9.2	0.5
Darling Downs	1,645	9.7	0.6	11.5	0.8
North West	234	7.2	3.1	9.3	4.1
South West	321	2.5	0.8	7.5	2.3
Central West	167	3.2	1.9	2.2	1.4
Total	31,296	172.6	0.55	185.6	0.6

Statewide there were **173** employees committed to food regulation for the 2018–19 reporting period, a 7% decrease from the previous report. The number of FTEs committed to food regulation in local government has remained at between 0.6 to 0.7 per 100 licensed food business, as can be seen in Figure 10. The South West region reported a decrease in the number of employees committed to food regulation (67%). However, this represents only 5 FTE, so any decrease should be treated with caution.

In total, 36 (46%) local governments reported using contractors to perform food regulation functions such as inspections, audits and complaint investigations. This is a slight increase from the 33 (42%) local governments who reported using contractors in the previous reporting period.

While most regions reported less than 1 FTE committed to food regulation per 100 licensed food businesses, both the North West and Central West regions had much higher ratios. These regions also reported using contractors to perform food regulation functions which may partly explain their responses.

Figure 10 Number of employees committed to food regulation in Queensland for reporting periods 2010-11 to 2018-19



5.7 Enforcement

The Act provides a suite of enforcement options. The enforcement action taken by a local government should be graduated and proportionate to the severity of the non-compliance observed and any history of non-compliance. When considering enforcement data, it is important to note that in addition to enforcement actions, local governments use non-punitive actions such as education to assist food businesses achieve or maintain compliance with the Act. This report does not capture information from local governments in relation to other strategies used.

It should also be noted that as Queensland Health is the lead agency in the management of foodborne illness outbreaks, misleading conduct related to the sale of food and food labelling and compositional requirements, the statistics in this report do not reflect the total number of enforcement actions undertaken annually under the Act, only those undertaken by local government.

A summary of the enforcement activities undertaken by Queensland local government is shown below in Table 10. Trends in numbers and types of enforcement action undertaken statewide between 2011-12 and 2018-19 are shown in Figure 11. This data will be discussed in the individual sections below.

Table 10 Enforcement activities undertaken by local government authorities in 2018–19

Region	Improvement Notices		Prescribed Infringement Notices		Immediate license suspensions		Total prosecutions	
	Number	Per 100 food businesses	Number	Per 100 food businesses	Number	Per 100 food businesses	Number	Per 100 food businesses
Brisbane & Moreton	2,168	10.3	417	2.0	39	0.2	54	0.3
Mackay & Fitzroy	83	4.1	8	0.4	0	0	0	0
Wide Bay Burnett	45	2.5	1	0.1	0	0	0	0
Far North	71	3.1	17	0.7	2	0.1	0	0
Northern	372	21.7	15	0.9	0	0	0	0
Darling Downs	226	13.7	45	2.7	1	0.1	0	0
North West	18	7.7	8	3.4	0	0	0	0
South West	1	0.3	0	0	0	0	0	0
Central West	1	0.6	0	0	0	0	0	0
Total	2,985	9.5	511	1.6	42	0.1	54	0.2

5.7.1 Improvement notices

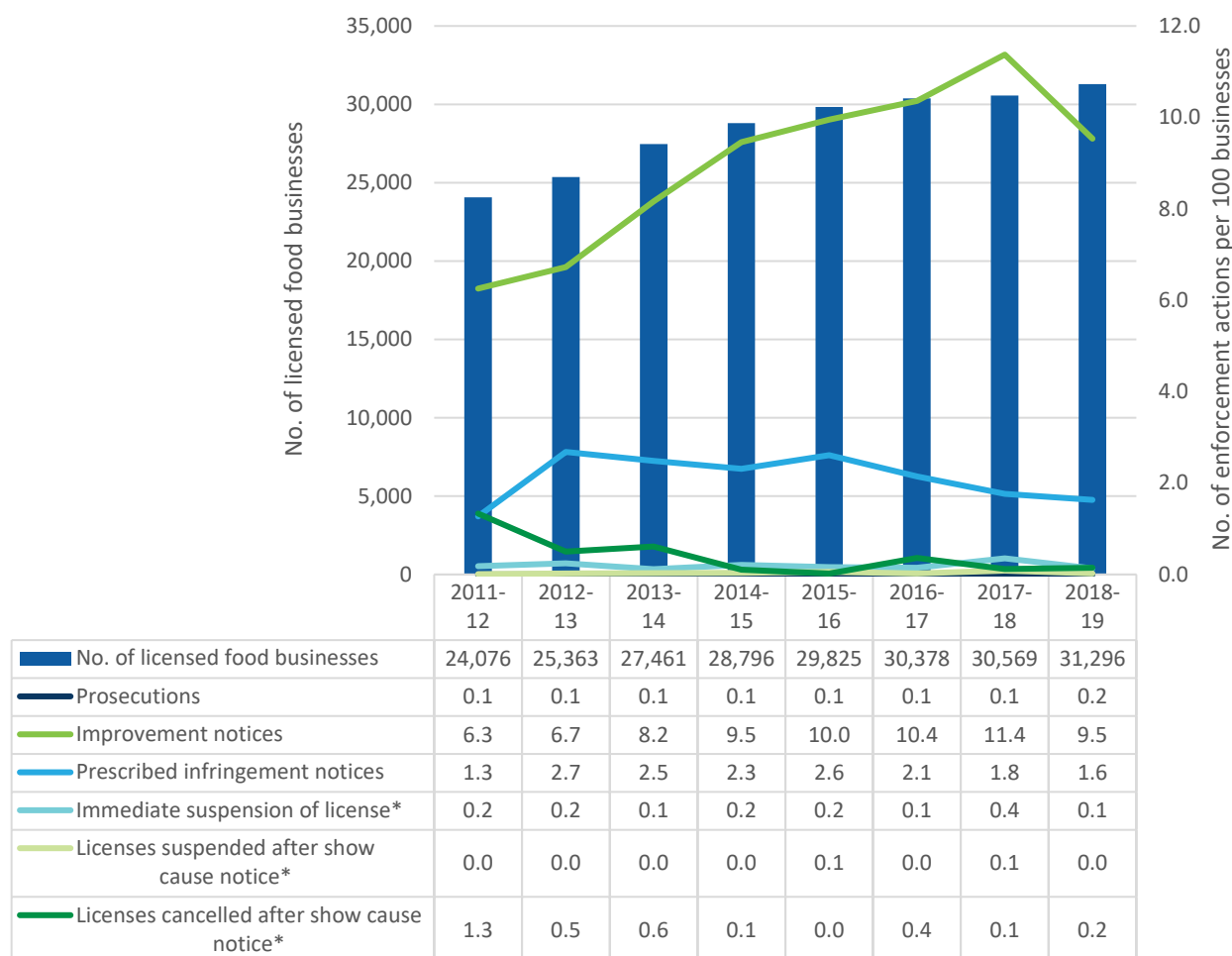
Improvement notices are utilised by local governments to address a variety of non-compliances within a food business. This may include issues such as the need to remedy cleaning, maintenance or structural contraventions or unsafe food handling practices. Improvement notices must provide food businesses with a reasonable timeframe to remedy any stated non-compliance.

Improvement notices remained the most common enforcement action, with **2,985** issued during the reporting period. This is a decrease of 14.2% from the previous period. A total of 44 local governments (56%) issued improvement notices for the reporting period. The local governments who did not issue any improvement notices were in rural or remote areas and often do not have EHOs employed by the local government.

The Brisbane and Moreton Region issued the highest number of improvement notices with 2,168 which is 72.6% of the total. This is not surprising given the substantially higher number of licensed food businesses within this region, though it is a marked decrease (26.8%) from the previous reporting period. It is also acknowledged that metropolitan local governments are often more likely to take enforcement action than their regional and rural counterparts who often tend to use less punitive actions.

The current reporting period is the first time the number of improvement notices issued has decreased since 2011-2012 (Figure 11). While the exact cause of this decrease is unknown, it is likely to be related to the increased oversight and regulation in the build up to the Commonwealth Games in 2018 and improvement of food safety issues following increased education and enforcement which occurred after a substantial increase of foodborne illness outbreaks in 2014-15.

Figure 11 Change in numbers and types of enforcement action undertaken in Queensland, expressed per 100 licensed food businesses, in the reporting periods 2011-12 to 2018-19.



*s82 of the Act

5.7.2 Prescribed infringement notices

Prescribed infringement notices (PINs) may only be issued for offences that fall within the guidelines for eligible offences that have been acknowledged as PIN offences in the *State Penalties Enforcement Regulation 2014*. Only certain offences under the Act have been prescribed as PIN offences. PINs are issued when offences pose a moderate threat to human health and safety, or where there are indications of previous, current and ongoing non-compliance, such as failure to comply with a licence condition (section 51(1)) or failure to comply with the Food Standards Code (section 39(1)). The monetary penalty for PINs increases, depending on the severity of the offence.

A total of **511** PINs were issued by 19 local governments in the 2018-19 reporting period. This represents a 5.4% decrease in the number of PINs from the 2017-18 reporting period, and a continuing decrease in the number of PINs issued annually since 2011-12 (Figure 11). The Brisbane and Moreton region issued most PINs (417 or 81.6%), which is consistent with previous reporting periods and aligns with the number of improvement notices issued. Both the South West and Central West did not issue any PINs for this reporting period.

5.7.3 Suspension or cancellation of licence

Section 78 of the Act allows local government to suspend or cancel a licence when:

- the licensee is not, or is no longer, a suitable person to hold a licence
- the licensee has not complied with the accredited food safety program and the non-compliance is likely to result in a high risk to public health or safety
- the licence was issued under false or misleading representation.

Licences can be suspended or cancelled either immediately or following a show cause notice. A show cause notice must follow the process described in section 79 of the Act. Local government can use the show cause notice provisions prior to taking proposed action such as suspending or cancelling the licence. Table 11 shows the number of licenses suspension or cancellations during each of the last three reporting periods. There was a 61.1% decrease in immediate license suspensions between 2018-19 and 2017-18 to pre-Commonwealth Games numbers (2016-17).

Table 11 Number of license suspensions or cancellations

Activity	2018-19	2017-18	2016-17
Number of licences suspended after show cause notice (s82 of the Act)	6	26	8
Number of licences immediately suspended (s83 of the Act)	42	108	44
Number of licences cancelled after show cause notice (s82 of the Act)	47	37	110

Compared with the issue of improvement notices and PINs, license suspensions and cancellations occur less frequently (Figure 11). In recent years, the number of enforcement actions involving licenses is <0.4 per 100 licensed food businesses.

5.7.4 Prosecutions

Prosecutions are usually initiated if there is a high threat to human health and safety, or if there is a known or expected ongoing non-compliance. Consequently, prosecutions are the least common, most resource-intensive and final enforcement tool utilised by local government.

A total of **54** prosecutions were undertaken in the 2018–19 reporting period. All except one of these, were undertaken by Brisbane City Council, with the remaining prosecution conducted by the City of Gold Coast.

Despite only two local governments undertaking prosecutions, there was a 22.7% increase in the number of prosecutions compared to the 2017–18 reporting period. As is shown in Figure 11, the number of prosecutions has increased from about 0.1 to 0.2 per 100 licensed food businesses in the current reporting period. This does not necessarily represent additional serious offences by food businesses but may be attributed to increased confidence of local government with respect to utilising enforcement powers.

Appendix 1 Map of local government regions

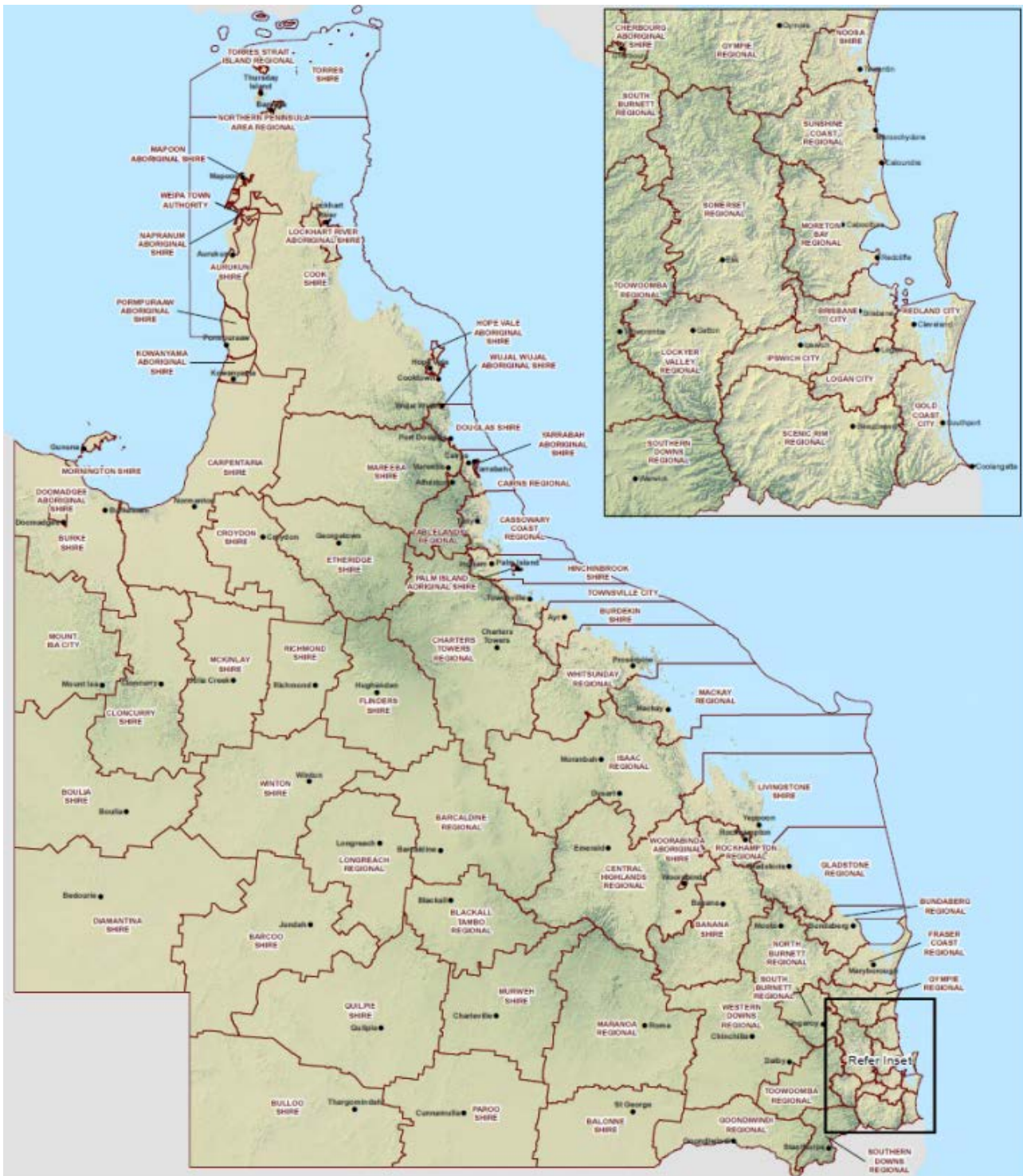


Qld region map 2.PNG was downloaded from <http://www.dlgrma.qld.gov.au/resources/map/local-government-area-boundaries.pdf> on 6 February 2020.

The report uses the Australian Standard Geographical Classification (ASGC)³ defined by the Australian Bureau of Statistics (ABS) for the collection and dissemination of geographically classified statistics.

³ Australian Bureau of Statistics. *Australian Standard Geographical Classification (ASGC) Queensland maps, July 2011*. Cat. No. 1216.0. ABS: Canberra; 2011

Appendix 2 Map of local government boundaries



Local Government Area Boundaries map downloaded from <http://www.dlgrma.qld.gov.au/resources/map/local-government-area-boundaries.pdf> on 6 February 2020

Appendix 3 Local government request form

Food Act 2006 - Section 28
Notice to Chief Executive
Report from local government



This form is to be used by local government when complying with section 28(3) of the Food Act 2006 for the reporting period 1 July 2018 to 30 June 2019.

Contact details	
Local government	
Contact person - name	
- position title	
- phone	
- email	
Please identify a generic email account to which you would like general updates and newsletters to be forwarded (optional).	
Licences	
Number of food businesses licensed as at 30 June 2019	
If licence categories are used, please provide the number of licensed food businesses for each category (e.g. 50 manufacturers).	
Food safety supervisors	
Number of licensed food businesses with a nominated food safety supervisor as at 30 June 2019.	
Is training in the recommended national competencies implemented as a mandatory requirement for food safety supervisors?	
Food safety programs	
Number of licensed food businesses serving to vulnerable persons that required a food safety program as at 30 June 2019.	
Number of licensed catering businesses that required a food safety program as at 30 June 2019.	
Number of food businesses that required a food safety program and that had an accredited food safety program as at 30 June 2019.	
Inspections	
Total number of inspections performed.	
Number of routine or scheduled inspections performed.	
Number of follow-up or re-inspections performed.	
Number of complaint inspections performed.	
Highest number of inspections for one premises i.e. most visits to a premises in the reporting period.	
Complaints	
Total number of complaints received regarding food businesses.	

Employees	
Number of authorised persons as at 30 June 2019.	
Estimated number of employees committed to food regulation expressed as full time equivalents (FTE), as at 30 June 2019.	
Are contractors used to perform food regulation tasks?	
Are contractors used in addition to employees authorised or as an alternative to permanent employees?	
Number of contractors used in 2018-19 expressed as an FTE.	
Enforcement	
Number of improvement notices issued.	
Number of seizures undertaken.	
Number of licences suspended after show cause process.	
Number of licences immediately suspended.	
Number of licences cancelled.	
Number of licences surrendered by the licensee.	
Number of PINs issued.	
Number of prosecutions undertaken.	
Information technology	
<i>We would like to understand more about how local government currently record, manage, store and access data and information relating to the management of the Food Act 2006; and how digital technology is used to support your role.</i>	
What digital technology do your officers use to support their regulatory functions, activities, and how? <i>(eg. tablet with custom application to record food business compliance inspections)</i>	<i>New question</i>
How do you store and access data relating to food business licences and other <i>Food Act 2006</i> matters? <i>(Excel Spreadsheet, SharePoint, OpenOffice, custom IT system, etc.)</i>	<i>New question</i>
What IT platform/s does your local government use for any aspect of management of the <i>Food Act 2006</i> ?	<i>New question</i>
Do you have any feedback on these or other systems you may have used? <i>(this can be positive or negative and can be included separately)</i>	<i>New question</i>
Mobile food vehicle register	
Please complete the mobile food vehicle register on next worksheet	

Please send completed form to:
Food Safety Standards and Regulation
Health Protection Branch, Department of Health
at foodsafety@health.qld.gov.au with
“local government report” in the subject line

Please remember to complete/attach:
MFV Register Information

If you require further information, please contact Food Safety Standards and Regulation on phone 3328 9310 or email foodsafety@health.qld.gov.au

Appendix 4 Summary of local government responses

Local government	Food businesses licensed at 30 June 2019	Businesses with a nominated food safety supervisor	Businesses that require a FSP that have an accredited FSP	Total inspections performed	Routine or scheduled inspections	Follow-up or re-inspections	Complaint inspections performed	Complaints received	FTE employees committed to food regulation	Are contractors used to perform food regulation tasks?	Improvement notices issued	Number of seizures undertaken	Number of licences suspended after show cause process	Number of licences immediately suspended	Number of licences cancelled	Number of licences surrendered by the licensee	Number of PINs issued	Number of prosecutions undertaken
Aurukun SC	3	3	1	3	3	0	0	0	0	"	0	0	0	0	0	0	0	0
Balonne SC	53	53	8	55	54	1	0	0	1	Yes	0	0	0	0	0	0	0	0
Banana SC	121	101	4	139	95	43	1	4	0	No	1	0	0	0	0	0	0	0
Barcaldine RC	39	39	0	78	39	39	0	0	1	Yes	0	0	0	0	0	0	0	0
Barcoo	7	7	0	7	7	0	0	0	0	Yes	0	0	0	0	0	0	0	0
Blackall-Tambo RC	40	40	1	52	33	19	0	0	0	Yes	0	0	0	0	0	0	0	0
Boulia SC	5	5	0	10	10	5	0	0	0	Yes	0	0	0	0	0	0	0	0
Brisbane CC	7,374	6,853	552	6,473	4,501	1,107	865	865	40	Yes	641	0	5	35	3	9	162	53
Bulloo CC	12	12	2	17	15	2	0	0	0	No	0	0	0	0	0	0	0	0
Bundaberg RC	545	479	28	645	606	30	9	56	5	Yes	23	0	0	0	0	73	0	0
Burdekin SC	136	136	7	206	136	62	8	8	2	No	4	0	0	0	0	0	0	0
Burke SC	9	9	0	9	9	0	0	0	1	No	2	0	0	0	0	0	0	0
Cairns RC	1,170	1,170	86	1,983	1,496	424	63	111	6	Yes	36	0	0	1	0	0	7	0
Carpentaria SC	31	31	1	8	5	3	0	2	1	Yes	0	0	0	0	0	0	0	0
Cassowary Coast RC	261	261	15	302	260	33	9	9	1	No	12	0	0	0	42	0	0	0
Central Highlands	207	194	6	135	127	3	5	5	1	No	1	0	0	0	0	9	0	0
Charters Towers RC	86	86	2	27	18	8	1	1	0	Yes	0	0	0	0	0	0	0	0
Cherbourg	3	1	2	4	4	0	0	0	1	Yes	0	0	0	0	0	0	0	0
Cloncurry SC	24	24	2	24	24	0	0	0	1	Yes	0	0	0	0	0	1	0	0
Cook SC	82	78	1	83	65	12	6	7	0	Yes	3	0	0	1	0	3	0	0
Croyden SC	3	2	0	1	1	0	0	0	0	No	0	0	0	0	0	0	0	0
Diamantina SC	6	6	0	29	18	11	0	0	1	Yes	0	0	0	0	0	0	0	0
Doomadgee ASC	0	1	1	12	8	4	0	0	1	Yes	0	0	0	0	0	0	0	0
Douglas SC	229	229	13	314	228	64	4	12	3	No	12	0	0	0	0	0	10	0
Etheridge SC	18	18	0	18	18	0	0	0	0	No	0	0	0	0	0	0	0	0
Flinders	12	12	0	3	3	0	0	0	0	Yes	0	0	0	0	0	0	0	0
Fraser Coast	506	506	36	325	260	54	11	37	4	No	14	0	0	0	0	0	1	0
Gladstone RC	257	207	22	336	299	31	6	79	3	No	11	0	0	0	0	6	4	0

Local government	Food businesses licensed at 30 June 2019	Businesses with a nominated food safety supervisor	Businesses that require a FSP that have an accredited FSP	Total inspections performed	Routine or scheduled inspections	Follow-up or re-inspections	Complaint inspections performed	Complaints received	FTE employees committed to food regulation	Are contractors used to perform food regulation tasks?	Improvement notices issued	Number of seizures undertaken	Number of licences suspended after show cause process	Number of licences immediately suspended	Number of licences cancelled	Number of licences surrendered by the licensee	Number of PINs issued	Number of prosecutions undertaken
Gold Coast	5,820	0	404	6,714	4,045	1,194	474	458	17	No	832	0	0	0	0	0	143	1
Goondiwindi RC	81	79	5	93	81	12	0	0	1	No	58	0	0	0	0	0	0	0
Gympie RC	336	280	22	280	211	61	8	28	3	No	4	0	0	0	0	0	0	0
Hinchinbrook SC	68	68	4	54	52	2	0	2	1	No	2	1	0	0	0	4	2	0
Hope Vale	4	4	1	4	4	0	0	0	0	No	0	0	0	0	0	0	0	0
Ipswich CC	832	813	98	1,450	988	432	30	74	5	Yes	83	0	0	0	0	0	17	0
Isaac RC	162	155	4	232	68	128	36	47	2	Yes	0	0	0	0	0	0	0	0
Kowanyama	1	1	1	0	0	0	0	0	0	No	0	0	0	0	0	0	0	0
Livingstone SC	181	174 - minus water carriers	14	253	198	52	3	8	2	No	7	0	0	0	0	11	0	0
Lockhart	0	0	0	0	0	0	0	0	0	Yes	0	0	0	0	0	0	0	0
Lockyer Valley RC	174	174	22	393	174	214	5	5	1	No	3	0	0	0	0	0	0	0
Logan CC	1,186	1,186	130	2,547	1,725	326	496	496	12	Yes	329	0	0	1	0	0	15	0
Longreach RC	47	47	2	44	40	2	2	2	0	Yes	1	0	0	0	0	0	0	0
Mackay RC	654	654	0	879	780	85	14	52	4	Yes	63	1	0	0	0	0	4	0
Mckinlay	14	14	1	21	21	0	0	0	0	Yes	3	0	0	0	0	3	0	0
Mapoon	0	0	0	0	0	0	0	0	0	Yes	0	0	0	0	0	0	0	0
Maranoa RC	171	171	0	68	60	4	4	5	1	No	0	0	0	0	0	0	0	0
Mareeba SC	238	238	8	241	188	29	24	26	1	Yes	2	0	0	0	0	0	0	0
Moreton Bay RC	1,860	1,667	195	822	519	162	141	173	5	Yes	84	1	0	2	2	0	67	0
Mornington Island SC	0	1	1	12	6	6	0	0	1	Yes	0	0	0	0	0	0	0	0
Mount Isa CC	132	129	15	249	237	7	5	8	2	No	13	0	0	0	0	9	8	0
Murweh SC	39	39	1	39	39	0	0	0	0	No	0	0	0	0	0	0	0	0
Napranum	2	2	1	2	2	0	0	0	0	Yes	2	0	0	0	0	0	0	0
Noosa	517	468	30	756	522	221	13	36	2	No	17	0	1	1	0	0	5	0
North Burnett RC	89	89	9	35	19	15	1	1	1	Yes	1	0	0	0	0	2	0	0
Northern Peninsula	0	0	0	0	0	0	0	0	0	No	0	0	0	0	0	0	0	0
Palm Island	0	0	0	4	1	1	2	2	0	No	0	0	0	0	0	0	0	0
Paroo SC	32	32	0	6	4	1	1	1	1	No	0	0	0	0	0	0	0	0
Pormpuraaw ASC	1	1	0	0	0	0	0	0	1	No	0	0	0	0	0	0	0	0
Quilpie SC	14	14	0	31	14	14	3	2	0	No	1	0	0	0	0	0	0	0

Local government	Food businesses licensed at 30 June 2019	Businesses with a nominated food safety supervisor	Businesses that require a FSP that have an accredited FSP	Total inspections performed	Routine or scheduled inspections	Follow-up or re-inspections	Complaint inspections performed	Complaints received	FTE employees committed to food regulation	Are contractors used to perform food regulation tasks?	Improvement notices issued	Number of seizures undertaken	Number of licences suspended after show cause process	Number of licences immediately suspended	Number of licences cancelled	Number of licences surrendered by the licensee	Number of PINs issued	Number of prosecutions undertaken
Redland CC	650	643	74	936	721	137	78	78	6	Yes	17	0	0	0	0	0	6	0
Richmond SC	11	11	1	10	10	0	0	0	0	Yes	0	0	0	0	0	0	0	0
Rockhampton RC	549	528	42	715	470	159	20	46	6	Yes	1	0	0	0	0	10	0	0
Scenic Rim RC	418	414	16	295	272	11	12	14	1	No	3	0	0	0	0	0	0	0
Sommerset	155	155	6	180	147	22	11	11	1	No	19	0	0	0	0	6	1	0
South Burnett RC	211	211	8	178	158	0	20	20	1	Yes	2	0	0	0	0	10	0	0
Southern Downs RC	317	298	16	237	209	14	14	16	2	Yes	4	0	0	0	0	0	0	0
Sunshine Coast	2,099	1,950	123	2,508	1,865	117	32	93	6	No	140	0	0	0	0	0	1	0
Tablelands RC	237	221	15	326	237	79	10	10	1	No	1	0	0	0	0	0	0	0
Toowoomba RC	958	958	90	1,421	1,135	244	42	101	6	No	148	0	0	1	0	39	43	0
Torres SC	28	28	3	32	29	3	0	1	0	No	2	0	0	0	0	0	0	0
Townsville CC	1,045	1,027	85	1,315	886	421	8	137	4	Yes	345	0	0	0	0	113	13	0
TSIRC	0	0	0	162	162	0	0	1	1	No	0	0	0	0	0	0	0	0
Weipa TA	24	24	0	67	40	26	1	1	0	No	1	0	0	0	0	6	0	0
Western Downs RC	289	206	16	210	197	10	3	6	1	No	16	0	0	0	0	0	2	0
Whitsunday RC	376	376	16	513	367	134	12	12	2	No	21	0	0	0	0	0	0	0
Winton SC	23	23	1	62	32	23	0	0	1	No	0	0	0	0	0	0	0	0
Woorabinda Aboriginal SC	1	1	1	0	0	0	0	0	0	Yes	0	0	0	0	0	0	0	0
Wujul Wujul	2	2	1	0	0	0	0	0	0	No	0	0	0	0	0	0	0	0
Yarrabah ASC	9	9	3	16	9	7	0	0	1	No	0	0	0	0	0	0	0	0
Total	31,296	23,974	2,275	35,710	25,286	6,330	2,513	3,169	173	-	2,985	3	6	42	47	314	511	54

