

Auckland Regional Public Health Service

Rātonga Hauora ā Iwi o Tamaki Makaurau



Working with the people of Auckland, Counties Manukau and Waitemata

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Sally Johnston
New Zealand Food Safety Authority
PO Box 2835
Wellington

Dear Sally

Submission from the Auckland Regional Public Health Service on the designation categories for Food Act officers.

1. Thank you for the opportunity for the Auckland Regional Public Health Service to provide a submission on the designation categories for Food Act officers.
2. This submission represents the views of the Auckland Regional Public Health Service (ARPHS). ARPHS provides public health services for the three district health boards in the Auckland region (Auckland, Counties Manukau and Waitemata District Health Boards), with the primary governance mechanism for the Service resting with Auckland District Health Board. This submission represents the views of ARPHS and does not necessarily represent the views of the three District Health Boards.
3. The Service understands that all submissions will be available under the Official Information Act 1982, except if grounds set out under the Act apply.
4. The primary contact point for this submission is:

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Introduction

5. ARPHS's food safety programme delivers food regulatory services in the greater Auckland region, and provides the Central Clearing House for imported foods. The Service's food safety programme is the largest provider of public health food safety in New Zealand due to:
 - the size of the population it serves, and
 - Auckland's role as a major entry point of imported food into the country.
6. ARPHS supports the introduction of the two new designation categories with just a few minor changes. These suggestions are detailed below.

Sampling officer designation criteria

7. ARPHS recommends that the 'General' competencies be copied from the on-call designation criteria to this set of criteria as they are applicable to sampling officers as well. ARPHS believes that it is important that any person exercising statutory powers should have an understanding of the legislative framework within which they are operating.
8. Some of the examples given in the final bullet point under the imported foods work area are no longer applicable. Specifically, designated officers no longer deal with ceramics and the only canned products processed are fish.

On-call officer designation criteria

9. On-call officers will be required to act with respect to imported consignments and therefore require authority under sections 11P, 24, 36 and 38 of the Food Act. Auckland is the major entry point for imported food and 'on call' officers may be required to deal with imported foodstuffs as part of ARPHS's role and responsibilities for imported food. The expectations listed under the 'Imported Foods' work area in the sampling officer criteria should be copied into the on-call criteria with the exception of the final bullet point (competency in processing imported food consignments), as on-call officers will not be required to do this.
10. On-call officers will not be required to act in accordance with Regulation 56 of the Food Hygiene Regulations 1974.
11. On-call officers will be required to act in accordance with Regulation 82 of the Food Hygiene Regulations 1974, which relates to the closure of premises. An additional work area and set of expectations will therefore also need to be included in the competency criteria.

Conclusion

12. Thank you for the opportunity to provide feedback on the suggested designation categories. ARPHS supports the intention of this proposal and has provided some minor suggestions that would ensure that sampling officers and on-call officers are best able to perform their duties.

Yours sincerely

William Rainger
Joint Service Manager
Auckland Regional Public Health Service