

**Auckland Regional Public Health Service**

Cornwall Complex, Floor 2, Building 15

Greenlane Clinical Centre, Auckland Private Bag 92 605, Symonds Street, Auckland 1035, New Zealand

Telephone: 09 623 4600

Facsimile: 09 623 4633

Website: [www.arphs.govt.nz](http://www.arphs.govt.nz)

19 December 2007

Submissions – Domestic Food Review  
C/O Policy Group  
New Zealand Food Safety Authority  
PO Box 2835  
Wellington

**Submission from the Auckland Regional Public Health Service on the Proposal for the New Zealand Food Safety Authority to Manage the Evaluation of Risk Based Management Plans—Discussion Document**

1. Thank you for the opportunity for the Auckland Regional Public Health Service to provide a submission on the Proposal for the New Zealand Food Safety Authority to Manage the Evaluation of Risk Based Management Plans —Discussion Document.
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:

Greg Simmons  
Medical Officer of Health  
Auckland Regional Public Health Service  
Private Bag 92 605  
Symonds Street  
Auckland  
09 6234600 extn 27153  
[gregs@adhb.govt.nz](mailto:gregs@adhb.govt.nz)

## **Introduction**

5. ARPHS is the largest public health unit (PHU) in the country and a significant proportion of its workforce is given over to food safety and other related activities, including investigation of food-borne illness.

ARPHS's food safety and regulation 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 welcomes the opportunity to submit on the framework presented in the Proposal for the New Zealand Food Safety Authority to Manage the Evaluation of Risk Based Management Plans —Discussion Document.
7. ARPHS supports the proposal's aims to improve industry access to evaluation services and to ensure greater consistency in the quality of evaluations. It does, however, have reservations as to whether the proposed system will provide the desired outcomes. ARPHS believes that the problems with the existing system are due not to market failure but to lack of workforce capacity and that taking measures to build capacity rather than interfering with the market would be more efficacious.

## **Existing situation and issues with evaluation**

8. ARPHS agrees with the identification of a small evaluation workforce as one the foremost problems facing the evaluation industry, and acknowledges the difficulty experienced by some industry operators in finding evaluators.
9. ARPHS, however, does not agree with a number of the reasons given for this workforce shortage. The assertion that 'demographics' constrain the number of people entering the workshop is questionable. It is unlikely that the shortage of evaluators can be attributed to population characteristics or geographical location but rather the stressful nature of the job and the lack of incentives to join the profession. ARPHS does not believe that the geographical location of evaluation providers presents a significant impediment to the provision of service considering that the majority of evaluations address a written plan only and site visits are rarely necessary.
10. In terms of the perceived 'shrinkage' of the evaluation market, while some tools have removed the need for evaluation, the industry is still in a position where demand outstrips supply. Given that there are only 36 approved evaluators and a forecasted 1000 evaluations to be carried out in the next five years, this situation looks set to continue.

## **Engagement of third party evaluators**

11. If the NZFSA were to proceed with this proposal, ARPHS has reservations about the inclusion of price as one of the criteria for inclusion on the preferred or panel

list of evaluation suppliers. There exists significant variation in evaluation charges and the proposal that agencies whose charges are 'significantly out of line' may be excluded from the supplier list looks to further diminish a workforce that is already struggling to meet demand.

### **Allocation of evaluation work**

12. ARPHS is concerned that the NZFSA has proposed to both allocate evaluation work and undertake evaluations. Despite assurances that 'there is an existing degree of organisational separation between the VA and other business groups within the NZFSA', this presents a significant conflict of interest risk. ARPHS would like greater clarification of the 'stringent and transparent criteria' for the allocation of evaluation work.
13. NZFSA has recognised that there could be variation in the charges which external parties will make for evaluation services. There is, as it stands, already significant variation in charges made by evaluation providers. ARPHS questions the ability of the NZFSA to equitably balance out these discrepancies. It seems inevitable that if a flat hourly fee is introduced and the NZFSA is collecting disbursements that work will be preferentially allocated to the provider with the lower hourly rate.

### **Competencies for evaluators**

14. ARPHS supports the proposal that the New Zealand and Export Standards Group of the NZFSA set the competency criteria for evaluators (expected to be similar to the existing criteria for recognition) and the performance expectations for evaluators.
15. ARPHS supports the proposal that the Approvals Group of NZFSA will monitor and evaluate the evaluation service provided to industry.

### **Fees**

16. Out of the two options presented, ARPHS would prefer that the NZFSA on-charge the exact hourly charges made by the particular evaluator. While ARPHS acknowledges that industry operators may be reluctant to accept the services of a more costly provider, we believe this is indicative of broader problems that the implication of NZFSA's proposal would engender, namely the removal of choice from the industry operator. While the proposal seeks to remove industry operator difficulties in finding evaluators it also removes their ability to select the service they believe to be the most appropriate and affordable.
17. Given that the NZFSA is proposing to add disbursements to the hourly fees to cover management and travel costs, one solution would be for the operators to set and collect the fees themselves, then provide a percentage of this to the NZFSA for management and quality control costs.

### **Alternative options**

18. ARPHS believes the key to improving industry access to evaluation services lies not in controlling the market, but in improving the capacity of the evaluation

workforce. A number of the proposed measures, particularly the price controls and the exclusive allocation of work by the NZFSA, could act as disincentives to entering the evaluation industry.

19. ARPHS advocates for the provision of incentives for potential evaluators to enter the workforce and the promotion of evaluation as a career choice by training providers.
20. One alternative would be that the NZFSA, on receiving an application for the development of an RBMP, provide the applicant with a shortlist of recommended evaluation providers that the NZFSA believes are best equipped to deal with the operator's requirements. It would then be the operator's responsibility to assess which provider to use.
21. While this proposal may seem similar to the status quo, there are a few significant variations, namely that the NZFSA will still select a pool of providers based on competency with the factor of cost being removed as a selection criteria, and that the provision of a shortlist will give industry operators a valuable steer towards making an informed and appropriate choice.
22. Another alternative would be that evaluators and industry to continue to negotiate the evaluation process, while the NZFSA increases its quality control responsibilities. This would enable the NZFSA to deal with non performing evaluators and consistency issues without unduly restricting the evaluation market.
23. The payment option outlined in the previous section could apply to both of these alternatives, and have the benefits of retaining supplier freedom to set charges while providing NZFSA with the resources for the management and monitoring of evaluation services.

## **Conclusion**

24. Thank you for the opportunity to provide comments at this stage of the process. ARPHS supports the proposal's goals of improved industry access to, and greater consistency and quality control of, evaluation services. ARPHS does, however, hold some reservations as to whether the proposal is the most effective means of achieving these goals and suggests the exploration of alternative measures.

Yours sincerely

Monica Briggs  
**Service Manager**  
**Auckland Regional Public Health Service**

