



Consultation: Proposals for regulations under the Food Act 2014

Ministry for Primary Industries
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Dear Sir/Madam

Submission on Proposals for regulations under the Food Act 2014

Thank you for the opportunity for Regional Public Health (RPH) to provide a submission on the proposals for regulations under the Food Act 2014. We have used the template provided by the Ministry for Primary Industries (MPI) for this purpose; answers to the questions posed by MPI follow this covering letter.

RPH wishes to be regarded by MPI as an affected party for the purposes of targeted consultation on the draft regulations, as indicated on page 2 of the discussion document (MPI Public Discussion Paper No: 2015/01).

Please refer to Appendix 1 for more information on RPH.

RPH understands that all submissions will be available under the Official Information Act 1982, except if grounds set out under the Act apply.

The primary contact point for this submission is:

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EXECUTIVE SUMMARY AND KEY RECOMMENDATIONS

1. RPH is grateful for the opportunity to contribute to the development of regulations under the Food Act 2014. We look forward to regulations that provide practical guidance to food businesses to enable manufacture of safe and suitable food. RPH has commented on questions raised in the discussion document, with the following key recommendations.

2. The discussion document proposes that the MPI chief executive be given the power to waive the requirement for onsite assessment of food business custom food control plans (question #2). RPH recommends that the conditions under which this waiver may be granted are clearly stated in regulations, and that use of a waiver should be under exceptional circumstances only.
3. RPH supports the proposal that food businesses renew their registration annually (question #9). RPH recommends that the annual renewal of registration should also be used as a mechanism to ensure that verification is current and acceptable. This would help ensure that businesses are subject to regular verification, providing further assurance of food safety and suitability.
4. While RPH supports the proposed maximum and minimum verification frequencies for national programme Level 2 and Level 3 businesses (questions #19/20), RPH recommends that maximum and minimum verification frequencies are also applied to national programme Level 1 businesses. The discussion document proposes that horticultural sector businesses are categorised into national programme Level 1, and it is of concern that there appears to be no proposed on-going verification requirements for these businesses, particularly as examples of major food outbreaks in New Zealand in recent years have been linked to the horticultural sector.
5. The proposals provide insufficient detail on management of persons with, or exposed to, infectious diseases communicable through food (question #31). In particular, RPH recommends that the regulations under the Food Act 2014 define the obligations of food business operators who are made aware of employees subject to the Health (Infectious and Notifiable Diseases) Regulations 1966.
6. The proposals for regulations under the Food Act 2014 are silent on the future status of the Food (Safety) Regulations 2002. The Food (Safety) Regulations provide a role for public health officials to protect against sale of food believed to be contaminated by organisms capable of causing food poisoning or communicable disease. RPH recommends that the 2002 regulations are retained in their present form, or that their provisions are included in regulations under the Food Act 2014.
7. RPH wishes to be regarded by MPI as an affected party for the purposes of targeted consultation on the draft regulations, as indicated on page 2 of the discussion document (MPI Public Discussion Paper No: 2015/01).

Yours sincerely

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Service Manager
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Dr Craig Thornley
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Registration requirements for food control plans and national programmes

1. Do you support the proposal whereby evaluation of custom food control plans will require an onsite assessment of the food business?

RPH comment: Yes

2. Do you support the proposal that the MPI chief executive be given the power to waive the requirement for an onsite assessment? If not, why not?

RPH comment: RPH considers that onsite assessments are the default requirement for evaluation of custom food control plans. Without an onsite assessment it would not be possible to confirm that the reality of a food business operation matches that described in paperwork submitted by the business.

RPH is aware of at least two examples where food businesses have submitted documentation for evaluation of their Food Safety programmes (FSPs) that varied significantly from actual food production process and conditions.

In the first example, the FSP documentation neglected to mention that the business operated on multiple sites and the production process required transportation of product between the sites.

In the second example, FSP documentation for a butcher's business failed to mention that there was no roof covering the rendering area in the centre of the premises. Movement in and out of this area needed to be managed as part of the *Listeria* Management Plan for this business.

RPH notes that Annex 1 (HACCP system and guidelines for its application) to the Codex document *General Principles of Food Hygiene* [CAC/RCP 1-1969] states that onsite assessments of process flows should be carried out.

RPH acknowledges that onsite assessment waivers may be appropriate for multi-site businesses in which the arrangement of the food production area and the food production process is virtually identical between the different sites. Waivers should not be provided to businesses that operate on multiple sites that vary in their spatial configuration, layout and therefore workflows: this may happen where a business acquires multiple premises that were not purpose-built for their operation.

Situations under which waivers of onsite assessments can be provided are exceptions to the general approach, and the regulations should precisely describe the conditions under which a waiver can be granted.

3. Do you agree with the proposal that food business operators will be required to validate certain processes and products before they will be allowed to use such processes or sell such products? If not, why not?

RPH comment: Yes. If food business operators wish to introduce novel processes or products, they have an obligation to prove that food safety and suitability will be upheld. This should be at the food business's cost, not that of the regulator.

4. Do you agree with the proposal that validation protocols are employed as an instrument to enable additional data to be gathered before an evaluator recommends that a business is registered?

RPH comment: Yes

5. Do you agree with the proposed content of evaluation reports, and consider it is an effective mechanism to provide assurance that food to be produced is safe and suitable?

RPH comment: Yes

6. Do you support endorsement by the evaluator of the evaluation report and the food control plan outline?

RPH comment: Yes, provided they are competent to do so.

7. Do you agree with the proposals for when changes to a food control plan will be considered to be significant? How will this proposal affect your business? Is it a practical measure, or are the specifications proposed too broad or too narrow?

RPH comment: Yes. RPH agrees with the proposed list of amendments to a food control plan that would be considered significant. This is a practical measure.

8. Do you consider that it is practical to require food businesses subject to food control plans to describe the physical boundaries of the site where they are operating? Do you consider such a requirement overly onerous, or do you agree that it is necessary to achieve the safety and suitability of food?

RPH comment: Yes. RPH agrees that it is necessary for food businesses subject to food control plans to describe the physical boundaries of the site where they are operating, in order to achieve the safety and suitability of food.

This requirement provides a check on whether food businesses are operating on more than one site, as transport of food during the production process may introduce hazards. Food control plans have a focus on process, and it is important to include consideration of the physical boundaries within which the business produces food.

9. Do you agree with the proposal that businesses renew their registration annually? What impact would such an annual renewal have on your business?

RPH comment: Yes. Annual registration renewal is a good mechanism to maintain links with food businesses and to ensure business contact details, records of ownership and food control plan verification are up-to-date. Regular registration of sectors such as the horticulture industry has not been required previously, and lack of accurate registration information resulting from this anomaly has the potential to impede investigation of food safety incidents. It is timely to create uniform registration renewal requirements that apply equally to all food businesses.

Annual renewal of registration also provides an opportunity to ensure that verification is current and acceptable. RPH has recent experience of instituting a recall of food from an inappropriately regulated food business that had not been verified for many years, despite the manufactured food being provided to vulnerable populations. By requiring evidence of verification in order to obtain registration, these problems may have been voided.

10. Do you consider that the objectives of these proposals could be met in another way?

RPH comment: No

11. Do you agree that your food business should be registered with the territorial authority in whose district you are located instead of with MPI?

RPH comment: No comment (not applicable)

12. If you are a mobile or vehicle-based business, do you agree that your business should register with the territorial authority as proposed? Does the proposal present any practical problems for your mobile or vehicle-based food business?

RPH comment: No comment (not applicable)

13. If your food business is a multi-site food business, would you elect to have all your sites registered with MPI under the same registration, or would you choose to register each part of your business separately with the local territorial authority?

RPH comment: No comment (not applicable)

14. Does the way that your business is set up lend itself to registering each part of the business under the same registration?

RPH comment: No comment (not applicable)

15. If your food business is part of an industry programme, do you consider the proposals for registering industry programmes to be workable, or would you rather register your business separately with your local registration authority?

RPH comment: No comment (not applicable)

Verification requirements for food control plans and national programmes

16. Do you consider that a performance-based verification system, whereby verification frequencies are increased for poor performers, is the best way to ensure that food businesses meet Food Act requirements?

RPH comment: Yes

17. Do you agree with the proposed frequencies for new and existing businesses subject to food control plans, and the minimum and maximum frequencies for performing and non-performing businesses?

RPH comment: No

18. Do you consider any of the proposed frequencies should be changed? If so, why?

RPH comment: Yes. The proposals currently allow an interval of up to three months before verification is required for a business subject to a new food control plan. RPH considers that this duration is too long, as these businesses all have critical control points that require monitoring. Ideally, verification should occur before the business first sells food to the public; while this may not be practicable, the maximum interval prior to first verification should be at least equivalent to or shorter than that of a business intending to operate under a template food control plan.

19. Do you agree with the proposed frequencies for new and existing businesses subject to national programmes, and the minimum and maximum frequencies for performing and non-performing businesses?

RPH comment: No – see comment for question #20, below.

20. Are there any aspects of the frequencies for national programmes which you don't agree with?

RPH comment: Yes. As currently worded, the discussion document proposes that national programme Level 1 businesses would not be subject to a minimum verification frequency, and the maximum verification frequency would depend on specific situations such as a recall, increased sporadic illness, adverse outcomes of MPI's food safety monitoring, or other system audits or surveys indicate potential problems. Our interpretation of this proposal is that, in the absence of specific situations arising, established national programme Level 1 businesses would not be subject to verification.

The list of food sectors proposed to be subject to national programme Level 1 requirements include producers of horticultural food and horticultural packing

operations. It is of concern to us that ongoing horticultural operations would not necessarily receive verification in the absence of detected faults or cases of illness.

New Zealand has had experience of outbreaks of severe illness and food incidents where links with horticultural production were either indicated (2002 hepatitis A outbreak linked to blueberries) or strongly suggested (2014 outbreak of *Yersinia pseudotuberculosis*). These examples suggest that the horticultural sector requires regular verification on a preventative basis, irrespective of specific situations arising.

RPH recommends that national programme Level 1 businesses should be subject to a minimum verification frequency of three years, with the flexibility to increase the verification frequency to four years on proof of consistently good verification performance.

Alternatively, RPH recommends that horticultural sector business should be re-classified as national programmes subject to Level 3 requirements which are similar to the industry programme NZGAP. If Level 2 was used for horticulture this would be the same as the USA proposals for their horticulture industry.

21. Do you agree with the differentiation of frequencies between food control plans and national programmes?

RPH comment: Yes; differentiation of verification frequencies between food control plans and national programmes enables greater calibration to risk.

22. Do you agree with all aspects of the process for verification set out above?

RPH comment: No. Initial verification must cover all aspects of a business. Verification scope as described in the text is satisfactory for verifications that occur after an initial verification.

Maximum verification frequency should not be increased until at least 2-3 consistently high-standard verifications have been achieved, whereby confidence in management, food safety behaviour, effectiveness of process controls and control compliance history can be determined. This cannot be determined by just one verification for a new business.

23. Is it clear in which circumstances the verifier will specify either an acceptable or unacceptable verification outcome? Do you agree with these proposals?

RPH comment: Yes, provided that a 'critical noncompliance' is defined.

24. Do you agree with the proposals for the verifier to adjust the frequencies of verification for food businesses subject to food control plans and national programmes?

RPH comment: No. The recommendation to vary should be referred to the regulator and then a decision made. This allows the process to be independent of the business owner

and the pressure placed by the business on the verifier, given that the business owner employs the verifier. Historically, audit reports were sent to public health services to review; on occasion, auditors would proactively contact the public health service in order to confide a general disquiet with a business that did not fit into an audit report.

25. Do you consider that adjusting the proposed frequencies as suggested in Table 5 will encourage businesses to comply with requirements?

RPH comment: Yes

26. Do you agree with the proposed verification frequencies for business subject to food control plans and national programmes?

RPH comment: No. Refer to answers to questions #19 and #20, above.

27. Do you agree with the way in which this document proposes that verification frequencies are varied if businesses do not achieve acceptable verification outcomes?

RPH comment: Yes

28. Are there any aspects of the proposals for verification that you consider should be amended?

RPH comment: Yes. Refer to answers to questions #19 and #20, above.

Food safety and suitability requirements for businesses subject to food control plans and national programmes

29. Are these proposed requirements sufficient to manage food safety and suitability as it applies to places, facilities, equipment and essential services? If not, please identify the additional requirements needed, and explain why.

RPH comment: Yes

30. Are these proposed requirements sufficient to manage food safety and suitability as it applies to supporting systems? If not, please identify the additional requirements needed, and explain why.

RPH comment: No, although the proposed requirements will be very helpful. The regulations should specify that records must be kept in a site that is readily accessible, if not onsite at the premises themselves, and are able to be retrieved in a minimum amount of time.

31. Are these proposed requirements sufficient to manage food safety and suitability as it applies to people?

RPH comment: No. RPH believe that there is insufficient detail on how infectious persons will be managed, even at this 'proposals for regulations' stage.

32. What requirements are necessary for people working with food who are suffering from illnesses that are likely to be transmitted through food?

RPH comment: The Health (Infectious and Notifiable Diseases) Regulations 1966 create particular restrictions and clearance criteria for food handlers who have been diagnosed and reported with communicable diseases, or who are confirmed or potential carriers of communicable diseases. These are operationalised in the *Communicable Disease Control Manual* (Ministry of Health, 2012).

Given the statutory basis for these restrictions, the links between the two sets of regulations (i.e., those under the Food Act and the Health Act, respectively) should be explicitly mentioned in the proposed regulations. Food business operators need to be mindful of the statutory requirements for suspension of infected food handlers and their exposed contacts from contact with food, and clear links to the Health Act would make this clear.

33. Are these proposed requirements sufficient to manage food safety and suitability as it applies to ingredients and other inputs? If not, please identify the additional requirements needed, and explain why.

RPH comment: Yes

34. What current traceability systems does your food business operate? Do you consider that implementing the proposed traceability requirements will be costly to implement? If so, please provide an indication of the costs, and explain why.

RPH comment: Not applicable

35. Are these proposed requirements sufficient to manage food safety and suitability as it applies to production processing and handling? If not, please identify the additional requirements needed, and explain why.

RPH comment: The description of chemical hazards does not appear to include agrichemicals. Explicitly including agrichemicals in the regulations would enable inclusion of horticultural production.

36. Are these requirements sufficient to manage food safety and suitability as it applies to finished products? If not, please identify the additional requirements needed, and explain why.

RPH comment: Yes

37. From your perspective are these requirements sufficient to manage food safety and suitability as it applies to documents, records and reports? If not, please identify the additional requirements needed, and explain why.

RPH comment: No, although the proposed requirements will be very helpful. The regulations should specify that records must be kept in a site that is readily accessible, if not onsite at the premises themselves, and are able to be retrieved in a minimum amount of time.

38. From your perspective are these requirements sufficient to manage food safety and suitability as it applies to corrective action? If not, please identify the additional requirements needed, and explain why.

RPH comment: Yes

39. From your perspective are these requirements sufficient to manage food safety and suitability as it applies to sampling and testing? If not, please identify the additional requirements needed, and explain why.

RPH comment: Yes

40. Where or when do you think sampling and testing should be a requirement?

RPH comment: Sampling and testing should be required when the processes do not control the food safety hazards and also when control is limited by time and shelf life is a part of the control system.

41. If these requirements are not sufficient to manage food safety and suitability as it applies to competency and training, please identify the additional requirements needed, and explain why.

RPH comment: Comments have been made in association with each of the questions asked in this section, and below.

Additional Comment

Regulation 12 of the Food (Safety) Regulations 2002 grants medical officers of health and designated officers with the authority to prohibit the sale of food suspected to be infected with an organism capable of causing food poisoning or a communicable disease. This is an important provision, as it enables public health officials to take action under urgency to prevent sale of food that may have been handled by a person capable of transmitting serious infectious disease.

The proposals for regulations under the Food Act 2014 are silent on the future status of the Food (Safety) Regulations, which is a surprising omission given the importance that the New Zealand public attaches to the role of public health officials in protecting against communicable disease risks. Given the confidential nature of the health information held by public health officials, it is important that these officials are given the legislated ability to utilise this information to protect public health.

RPH recommends that the Food (Safety) Regulations 2002 are retained. If MPI intends to recommend to Cabinet that the Food (Safety) Regulations 2002 are revoked, RPH recommends that provision be made in the new Food Act 2014 regulations to enable public health statutory officers (medical officers of health, health protection officers) to prohibit the sale of food held to have been contaminated by organisms capable of causing food poisoning or communicable disease.

Recognised agencies, persons, and classes of persons

42. What else do you think should be included in the list of sectors or processes that may require specialist technical competencies? What are the reasons for your views?

RPH comment: No comment

43. Do you think verifiers of food importing businesses should be required to meet the same core requirements as other verifiers? What are the reasons for your views?

RPH comment: Yes. Verifiers of imported foods need to understand the control processes required in producing the food that is coming into New Zealand. They will need to assess the quality documents that may come in with the food and to be able to have a good idea of what they are expecting to see in the product being imported.

44. What information do you think should be in the public register of recognised agencies, persons and classes of persons that is not already required by Schedule 5 of the Food Act?

RPH comment: No comment

45. Do you agree that regulations are necessary to set out the core requirements for recognised agencies and persons, or do you think there is a better way to meet the identified objectives? What do you suggest instead and why?

RPH comment: The regulator should set out core requirements.

46. Do you agree that accreditation to ISO 17020 should be mandatory for agencies wishing to be recognised to verify and/or evaluate food businesses operating under custom food control plans? What are the reasons for your view?

RPH comment: Yes. This maintains a nationwide quality standard. If a cheaper, simpler assurance system could be found then this could be considered.

47. Do you agree that agencies applying for recognition to verify food businesses operating under national programmes, or template food control plans (other than those described under section 137 of the Food Act) should be required to demonstrate that they meet the core requirements set out in this document? What are the reasons for your view?

RPH comment: Yes. This is necessary for national consistency and to ensure competent verifiers are employed

48. Is it appropriate that the MPI should itself assess the competencies of some agencies and persons who apply for recognition? What are the reasons for your view?

RPH comment: Yes. MPI is the regulator that sets and monitors standards. Any delegation to a third party would still require MPI to provide oversight.

49. Do you think that accreditations other than ISO 17020 should be able to be used to demonstrate full or partial compliance with the core requirements? What are these? Why do you think these alternatives should be considered?

RPH comment: Yes, but unclear whether alternatives exist.

50. Do you agree that these are appropriate requirements for renewal of recognition by an agency or person? What else do you think should be included? What are the reasons for your views?

RPH comment: Yes. A recognised quality system will help maintain standards nationally.

51. Do you agree that these are appropriate performance requirements for agencies and persons? What else do you think should be included? Should anything be excluded? What are the reasons for your views?

RPH comment: Yes agree with the inclusions

52. Do you agree that someone who has evaluated, or provided consultation or technical advice on the development of, a custom food control plan may not perform verification against that plan within a two year period? What are the reasons for your views? If you disagree, how can any potential conflicts of interest be managed?

RPH comment: Yes. The author or adviser on the development of a food control plan cannot provide independent verification of performance under that plan due to a conflict of interest.

Approved documents, materials, facilities, or persons or classes of persons

53. Do you agree that it is necessary to set out criteria for approvals in a regulation? What are the reasons for your view?

RPH comment: Yes. This is important for national consistency and to provide clear expectations.

54. If you agree that a regulation is necessary, do the three proposed criteria cover the areas that should be considered before an approval is made? Should anything else be included? If so, what and why?

RPH comment: Yes

55. Is there anything else that you think should only be used if it has been approved under the Food Act? What and why?

RPH comment: No comment

Food standards

56. Are there any other criteria that should be considered in determining maximum residue levels?

RPH comment: No comment

57. Do notices specifying maximum residue levels need to provide other information than that identified for inclusion in regulations?

RPH comment: No comment

58. Are these conditions of sale for foods containing residue of agricultural compounds appropriate? Are other conditions required?

RPH comment: No comment

59. Are there any other circumstances where a food containing a residue of a specified substance should be exempt from the conditions of sale proposed for inclusion in regulations?

RPH comment: No comment

Imported food

60. Does the proposed timeframe for importers with a deemed status to register appear appropriate to you?

RPH comment: Yes

61. Are the proposed information requirements appropriate in relation to the safety and suitability of imported food? Are there matters included that you think are not necessary or are there further matters that you think should be included?

RPH comment: No. The regulator should hold information on the scope of products that the business imports, in order to enable more effective searching of the imports register.

62. Are all the key requirements concerning storage and transport requirements of imported food included in the proposed regulations?

RPH comment: Yes

63. Is more detail needed on the directions a Food Safety Officer can give about imported food that requires clearance (for example destruction or re-export of the food concerned)?

RPH comment: No; powers to seize, detain, destroy and to give directions currently exist. It is presumed that re-export can be done using existing powers, if not, this power should be created in regulations.

64. Do these proposals for verification of importers raise any concerns for you? For example, do they under-represent the risk presented by these foods? Should there be a more proactive system of verification (recognising that, if cleared, foods will become subject to relevant risk based measures when traded in the domestic market)?

RPH comment: Regular verification is important. Imported food must meet the requirements of the Food Act and must be verified regularly, in line with requirements on New Zealand-based food producers and manufacturers.

65. Are there other matters concerning the categorisation of imported foods that you think should be included in the regulations?

RPH comment: The general risk-based categorisation of imported foods, as outlined in the discussion document, appears appropriate. It will be important to consider whether private importation of food by consumers for their own consumption should also be addressed by the regulations; it is apparent that this sector is increasing as a result of direct-to-consumer online sales by international food producers.

66. Do the categories proposed for imported foods appear appropriate to you? If not, do you have other suggestions for how they should be categorised?

RPH comment: Yes

67. Are there other matters you think the MPI chief executive should consider in categorising imported food other than those identified?

RPH comment: No

68. Are there any other matters you think should be considered regarding the clearance of high regulatory interest imported food?

RPH comment: There are considerable on-going issues around labelling of imported foods; these should be addressed with importers in the first instance, rather than at the retail level.

69. Is other information required to give greater clarity to the category of imported food of increased regulatory interest and how it will be managed?

RPH comment: No

70. If so, what information?

Exemptions

71. Do you consider that there are any sound reasons, or instances worth investigating, to exclude any food, persons, or operations from the general exemption for businesses trading for charitable, benevolent, philanthropic or cultural purposes?

RPH comment: Any business producing high risk food for vulnerable populations should not be included in any exemption, whether trading for charitable, benevolent, philanthropic or cultural purposes.

72. Do you consider that there are any sound reasons, or instances worth investigating, to exclude any food, persons, or operations from any requirements of the Food Act? Identify whether you consider there are any specific instances to investigate.

RPH comment: No

73. Do you consider there are instances where exemptions for certain food exports should be considered?

RPH comment: Yes, where a food is exported to a country where the food standards differ from New Zealand and the food will not be sold in New Zealand.

74. How would any such exemptions fit in with the Minister's discretion as provided for in the Food Act under section 345?

RPH comment: These exemptions are consistent with the Minister's discretion as provided under the Food Act section 345.

75. Do you agree with the circumstances proposed that would provide for the MPI chief executive or the chief executive of a territorial authority to grant exemptions, waivers or refunds of a fee charge or levy?

RPH comment: Yes

76. Do you consider that there are grounds for considering additional circumstances to be considered relating to certain services or activities? If so, what do you consider those grounds to be?

RPH comment: 'Additional circumstances' should be defined in some way and not left open.

Infringement offences

77. Do you agree that sections 234 (1)(c) and 240(2) offences should be prescribed as infringement offences?

RPH comment: Yes

78. Do you agree with the proposed infringement fees?

RPH comment: Yes

79. Do you agree with the requirements identified and the associated infringement fee in the proposed infringement scheme for the Australia New Zealand Food Standards Code?

RPH comment: Yes

80. Are there infringement offences that you consider should be in place for commencement of the Food Act that are not currently proposed?

RPH comment: No

Transitional matters

81. Do you agree with the proposed transition schedule in the table? Why or why not?

RPH comment: No comment

82. In your view, should businesses participating in the voluntary implementation programme transition with their sectors in the first and second authorised transition periods or the third period? What is the reason for your view?

RPH comment: No comment

83. Do you think a similar option should be offered to all businesses operating with an approved food programme? Why or why not?

RPH comment: No comment

84. Do you support extending the introductory period to 30 June 2019 to align more closely with common financial and planning cycles?

RPH comment: No comment

85. Do you support the proposed expiry dates for deemed recognition? If not, why not?

RPH comment: No comment

Appendix one

Regional Public Health serves the greater Wellington region, through its three district health boards (DHBs): Capital and Coast, Hutt Valley and Wairarapa and as a service is part of the Hutt Valley District Health Board.

We work with our community to make it a healthier, safer place to live. We promote good health, prevent disease, and improve the quality of life for our population, with a particular focus on children, Māori and working with primary care organisations. Our staff includes a range of occupations such as: medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts.