



14 March 2024

Cost Recovery Directorate- Corporate Branch
Ministry for Primary Industries
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Submitted via email: costrecovery@mpi.govt.nz

Tēnā koe

Submission on Cost Recovery Proposal to Maintain and Expand New Zealand's Food Safety Core Regulatory Services Under the Food Act 2014

This submission is made in support of Taituara's submission and also Manawatū District Council's submission.

Manawatū District Council (MDC) carries out the environmental health function for Rangitikei District Council (RDC). We agree that food safety regulatory services play a crucial role in protecting public health, ensuring food safety, promoting consumer confidence, facilitating international trade, and safeguarding the integrity of the food supply chain. Areas where we hold the same concerns as MDC are:

Implications of Additional Levy on Food Businesses

We agree the potential imposition of a levy on food businesses, could have negative economic and social ramifications, especially in the current financial times and when businesses are still recovering from the impacts of COVID-19. As this cost would have to be passed onto consumers this outcome could have far-reaching consequences for community well-being and our communities ability to afford to ensure they have the basic life necessities. We support MDC's recommendation that MPI align its proposal's objectives with the principles outlined in section 16(d) of the Food Act, particularly the need to minimise compliance costs for food businesses.

Proposal for Territorial Authorities to Collect Domestic Food Business Levy as Part of Existing Registration Processes

RDC also does not support the proposal for territorial authorities to collect the new domestic food business levy on MPI's behalf. RDC also agrees with the submission points raised by Taituarā regarding the collection of the new levy. We further agree with Taituarā that central government needs to independently collect its regulatory fees.

Potential Incurred Costs from the Collection and Transfer of Levy Payments to NZFS

RDC supports Taituarā's submission that the proposal's assumption that it will take councils an average of five minutes of additional work on top of existing registration processes to collate, track and transfer collected levy revenue to MPI is wrong. This is gravely underestimated and will take local authorities longer while also creating an additional administrative burden on Council staff.

Increased Consistency of Training for Verifiers and Provision of Verification Services

RDC agrees with MDC's statement that domestic food businesses benefit from greater consistency of training for verifiers and provision of verification services and that an adequate amount be paid for the services.

RDC thanks MPI for the opportunity to provide feedback on this proposal.

Ngā mihi



Andy Watson

Mayor – Rangitikei District Council