



10 March 2026

Committee Secretariat
Education and Workforce Committee
Parliament Buildings
Wellington

Submitted via: [Health and Safety at Work Amendment Bill - New Zealand Parliament](#)

Tēnā koutou,

Submission from Rangitikei District Council on the health and Safety at Work Amendment Bill

1. Introduction

1.1 Rangitikei District Council (RDC) is the territorial authority for the Rangitikei District. RDC employs a workforce of around 140 staff and also uses contractors and volunteers to undertake its functions. Like any local authority, RDC's functions are broad and diverse. Critical risks for workers include, but are not limited to, driving, use of heavy plant and machinery, working around water, working alone and in remote areas, working in adverse weather conditions and environments, working with hazardous substances, and human behaviour.

1.2 We are pleased to have the opportunity to submit on the Health and Safety at Work Amendment Bill, and we thank you for taking the time to consider our submission.

2. Overview

2.1 We agree that a review of New Zealand's health and safety legislation, and related regulations, is required. Our view is that the key drivers for such a review should be to:

- a) Enhance workplace health and safety and improve NZ's overall workplace health and safety performance (less worker deaths and injuries)
- b) Increase the clarity of legislative requirements
- c) Promote easier compliance for all PCBU's
- d) Provide more industry specific guidance.

2.2 There are some aspects of the proposed changes that we explicitly support, some aspects that we have concerns about. These are identified below. We do not hold a

strong view either way about proposed changes that are not mentioned in our submission.

3. What we support

3.1 Recreational Access to Land:

We support the proposed clarity around recreational access to land, which confirms that landowners and occupiers are not responsible for health and safety risks to recreational users unless the recreational activity is connected to the PCBU's work or work of the PCBU is occurring at the same time and place. This clarity is helpful to us as local council given that we own / administer a large amount of public land, parks and reserves, and because at times we do not have PCBU level control over the activities that are undertaken at these locations.

3.2 Improved Codes of Practice:

We support the concept of having more approved codes of practice, and more industry specific guidelines. In this light we would like to see increased focus on the development of approved codes of practice for a range of local government activities, such as response to civil defence emergencies.

4. What we have concerns about

4.1 Different Obligations for Small PCBU's:

We are concerned about the proposal that small PCBU's (businesses with fewer than 20 workers) will have reduced health and safety obligations compared to larger PCBU's, due to the proposal that small PCBUs will only be required to comply with Sections 36 to 43 in relation to 'critical risks'. There are two key reasons for our concerns.

1. In principle, we believe that every NZ worker deserves the same level of health and safety protection, regardless of the size of the organisation they work for. We believe that all organisations should be required to effectively identify and manage all risks to health and safety, not just critical risks.
2. We are also concerned that the effect of the proposed reduced obligations on small businesses could shift that obligation and responsibility to large businesses in situations where a joint PCBU relationships exists (such as in the case of a large business contracting a smaller business). We believe this could place an unreasonable burden on larger businesses and may create confusion of obligations within joint PCBU relationships.

Based on the above, we request you to consider not proceeding with the proposal to reduce the health and safety obligations of small businesses. Rather, all PCBU's should have the same health and safety obligations and should be required to manage both critical and non-critical risks to the health and safety of workers.

4.2 Definition of Critical Risk:

The Bill proposes a new statutory definition of *critical risk*, which includes (among other things) the wording 'hazards likely to result in...'. We would like to see clarity of how the legislator defines 'likely'. For example, is 'likely' to be assessed before or after appropriate hazard controls are applied. We feel that having a clear definition of 'likely' is important to enable PCBU's to appropriately identify and prioritise 'critical risks'.

5. Conclusion

Thank you for the opportunity to provide feedback on the Health and Safety at Work Amendment Bill 2026.

Ngā mihi,

A handwritten signature in black ink, appearing to read 'C. Gordon', with a stylized flourish at the end.

Carol Gordon
Chief Executive