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Domestic Food Review

Survey of Territorial Authorities

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Executive Summary

One of the first stages of the Domestic Food Review is to gather data about the nature, type and distribution of food premises that handle, prepare, manufacture or sell food in New Zealand and to document how food legislation is administered at a local level. The New Zealand Food Safety Authority (NZFSA) developed a questionnaire with which it surveyed all 74 Territorial Authorities (TAs) in New Zealand.

The results of the survey have provided an initial snapshot of food administration at a local level, and revealed inconsistencies in , categorisation of premises, charging and inspection frequencies. The responses also highlighted the different solutions TAs employ to tackle food issues in their area, e.g. not disadvantaging isolated premises or improving hygiene standards in poorly performing premises.

The qualitative form of many of the responses means that the report is more picture building than comparative in nature.

The results showed that there are 22,941 registered food premises and 1684 registered food manufacturers in the 74 TAs. TAs also estimated there to be 5508 non-registered premises, 9440 occasional premises, 3049 exempt premises and 1467 partially exempt premises. It must be emphasised that these last figures are estimates only as the majority of TAs do not collect these data, nor is there any requirement for them to do so.

There are 158 full-time equivalent Environmental Health Officers (EHOs) in 73 Territorial Authorities spending, on average, 45% of their time on food issues. Thirty-four TAs, of which 32 are rural, employ one FTE EHO or less. The majority of EHO time on food-related issues (65%) is spent undertaking premise inspections. TAs investigate approximately 2300 food-business related complaints a year. Nearly a quarter (28%) of TAs use contractors to perform all or part of their food work.

Fees are calculated and charged one of four ways: a flat fee (17 TAs, 11% of premises); risk grouping or risk factor (24 TAs, 30% of premises); by activity type (24 TAs, 31% of premises) or based on ground area or seating numbers (9 TAs, 29% of premises). Twenty-three TAs recover less than 50% of their costs through user charges, however 12 recover 100% and, in two instances, more. Interestingly cost recovery is neither a function of premise numbers registered with a TA nor population size.

Twenty-six (35%) TAs have food-related bylaws, with a further 10 (17%) proposing to put food bylaws in place. The most popular bylaw provision is to require compulsory training/qualifications for food handlers (19 of the 26), followed by provisions for closing premises (12 of the 25).

It is recommended that the NZFSA work with TAs to develop and implement a consistent method for registering and categorising food premises and manufacturers. It is also recommended that the NZFSA work with TAs to establish national standards for data collection and that a national method of evaluating food premises be developed.

Contents

Executive Summary.....	1
1 Introduction.....	4
1.1 Objective.....	4
1.2 Survey development.....	4
1.3 Survey data/collection	4
2 Results and Analyses.....	6
2.1 Benchmarking data.....	6
2.1.1 Regulation 4 food premises	6
2.1.2 Regulation 5(7) food manufacturers	7
2.1.3 Employee numbers	8
2.1.4 Non-registered premises.....	9
2.2 Resource requirements	9
2.2.1 Territorial Authority food activity breakdown.....	9
2.2.2 External resource use	10
2.2.3 Fees and charges	10
2.3 Operational matters	13
2.3.1 Food strategies	13
2.3.2 Performance measures.....	14
2.3.3 Food bylaws.....	15
2.3.4 Food-related community outcomes	15
2.3.5 Registration frequency	15
2.3.6 Food premise inspection frequency.....	15
2.3.7 Hygiene grading scale	16
2.3.8 Investigating food complaints	16
2.3.9 Training	17
2.3.10 Providing information and advice to food premises.....	17
2.3.11 Operational system support.....	17
2.3.12 Food priorities	18

2.4	Issues and solutions	19
2.4.1	Regulatory issues	20
2.4.2	Workload and resourcing of EHO work	20
2.4.3	Geographical issues	21
2.4.4	Language and culture issues	21
2.4.5	The past... ..	22
2.4.6	General comments.....	22
3	Conclusions and Recommendations.....	23
	Appendices	20

1 Introduction

The New Zealand Food Safety Authority (NZFSA) has begun a major review of New Zealand's domestic food controls; the first time in 25 years that this has been undertaken. One of the first stages is to gather data about the nature, type and distribution of food premises that handle, prepare, manufacture or sell food in New Zealand and to document how food legislation is administered at a local level.

Central government has traditionally had very little nationwide data regarding domestic food businesses. Bringing together all central government food responsibilities under one umbrella has provided the impetus to collect information that was previously unavailable.

With this in mind, the NZFSA developed a questionnaire with which to survey all Territorial Authorities (TAs) in New Zealand. See Appendix 1 for a copy of the survey. The responses to the survey form a very large document which is attached as a CD.

The survey is an initial snapshot of the numbers and types of food businesses in New Zealand. The qualitative form of many of the responses means that the report is more picture building than comparative in nature. Given that TAs are not required to hold information in any particular format, and that some information is not required to be held at all, this is not surprising.

1.1 Objective

The survey objective was to collect baseline information on food premises, how TAs implement their responsibilities under the Food Hygiene Regulations 1974 (FHR) and the resources required to do this, and any issues they might have in meeting their food obligations. It was anticipated that the survey data would be used to benchmark the domestic food sector, to help develop and assess any proposals that may come out of the domestic food review and used to risk profile certain food-hazard combinations.

1.2 Survey development

The survey was initially developed in conjunction with Local Government New Zealand (the organisation that represents TAs) and refined to meet survey objectives. It was reviewed in-house for accuracy by the NZFSA-TA working group to assess the practicality for TAs in obtaining the data, and by a Ministry of Agriculture and Forestry (MAF) statistician for consistency, ease of use, and likely data quality.

1.3 Survey data/collection

The survey was mailed to all 74 TAs and followed up by phone to ensure that the survey had been received and that someone within the organisation was responsible for completing it. Some of the surveys were filled out by Environmental Health Officers (EHOs), some by supervising EHOs, some by managers and some by contractors to the TA. Additional follow up phone calls were necessary to clarify responses and to ensure that any unanswered questions that had been left blank were due to a lack of data to elicit a 100% response rate.

As with all surveys, the quality of the results and analyses depends on how well the survey has been planned and designed and how full and accurate the responses are. There was significant variation in the types of responses received.

A number of TAs made a substantial effort to provide as much information as possible to inform the survey. A lot of very interesting and useful information was received, e.g. pamphlets/booklets given to new entrants to the industry, how to meet food obligations, running a fundraising event, and a Food Safety Programme template amongst other things.

These gave a terrific look at some of the work TAs are putting into food safety and public health protection.

2 Results and Analyses

Surveys were sent to the 74 Territorial Authorities (TAs); the NZFSA received all 74 responses.

The survey contained questions that yielded both quantitative and qualitative data and consequently there is a mix of objective and subjective analyses in this report. Analysing qualitative data can never be as clear cut as simple analysis performed on quantitative data. Qualitative answers have been summarised and grouped into common themes in order to build a picture of TA responses and every effort has been made to ensure that results and conclusions presented are a fair and accurate representation of the information TAs provided.

Most quantitative results are presented as simple counts, percentages and graphs. One slightly unusual statistic used is the correlation coefficient, which looks for a linear relationship between two variable ranges. It is expressed as a decimal; the closer the returned value is to 1, the greater the relationship between the variables.

Each TA collects and stores information in a different manner and accordingly some were unable to fill in the survey completely. The number of respondents to each question is clearly indicated throughout the results.

2.1 Benchmarking data

2.1.1 Regulation 4: food premises

The first question of the survey asked for the total number of food premises registered under regulation 4 of the Food Hygiene Regulations 1974 in each TA. All 74 TAs responded to this question, giving a total of 22,941 registered food premises in New Zealand.

The second survey question asked that premise numbers be broken down into any category groupings that the TA may use. Sixty-seven TAs (91%) were able to do this, the seven who left this section blank either do not categorise food premises for registration purposes, or the structure of their database made it overly time consuming and/or costly to extract this information.

The number of food premises in New Zealand drops from 22,941 to 22,487 when the data are reported by category. The 454 premise difference is likely explained by the way that TAs record their data, as many inconsistencies were found between total premise numbers and the sum of categorised premise numbers. It is assumed that TAs would have greater certainty about total premise numbers, and 22,941 is considered to be the more accurate figure for the purposes of this report.

It quickly became apparent that there are as many ways to categorise premises as there are TAs in New Zealand. The most common approaches were to categorise premises by activity type, by floor area or seating numbers, or by risk groups. Eight TAs (11% and accounting for 7% of premises) register premises under multiple categories, and some TAs use such broad categories that it was impossible to differentiate premises within each category. Figure 1 shows the number of premises by category for those categories with greater than 200 premises. Full results can be found in Table 1 of Appendix 2.

The diversity in premise categorisation made it very difficult to collate and summarise the data, and just over half the premises had to be placed into the 'other' category. This included premises with multiple registrations, premises that were not categorised by activity type and premises that were not categorised at all. Of the 8894 'other' premises, only 789 belonged to truly miscellaneous categories.

Of premises that could be categorised, eating houses were the most numerous at 5512 (37% of premises not belonging to the 'other' category) and in city and urban areas were always the

largest category. In rural areas, grocery/dairy or lunch bar/takeaway premises were more common than eating houses.

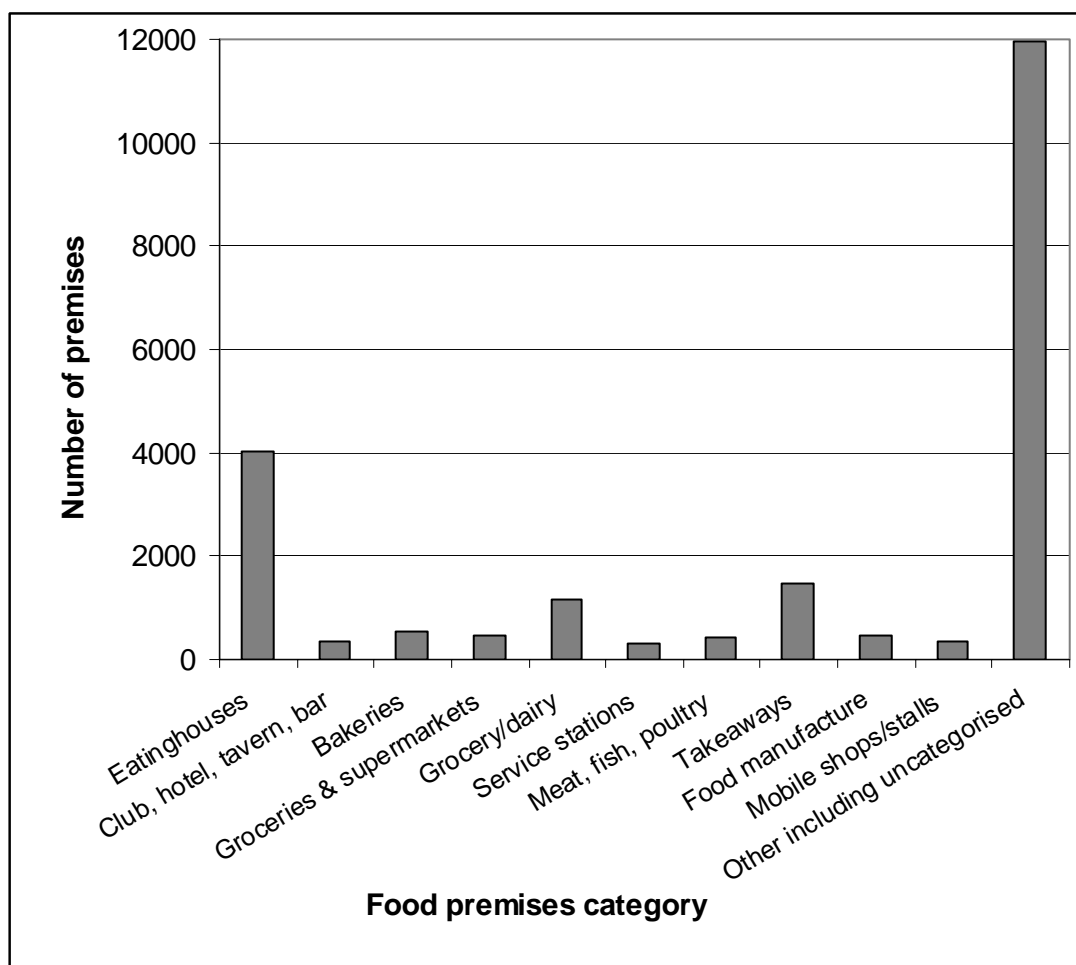


Figure 1: Food premise numbers by category

2.1.2 Regulation 5(7): food manufacturers

The objective of the third and fourth questions in the survey was to determine the number and types of businesses registered as manufacturers under regulation 5(7) of the FHR. The information from these questions was to be included in a risk profiling project analysing the certain food types and their associated food hazards. These were difficult questions to structure, and difficult to answer. They were designed to suit the intended analysis, which unfortunately did not match how most TAs collect and store their data. The responses consisted of a mixture of reporting by raw material and process, as well as listing by food type.

The response to Question 3 was high at 99% with only one TA unable to provide any information on the numbers of businesses registered as manufacturers under regulation 5(7). However, fewer TAs (84%) were able to place their manufacturers into categories.

Thirty-one TAs listed 'manufacturers' under both the regulation 4 and regulation 5(7) questions. We were unable to judge whether these premises were actually registered under both regulations, whether the question had been misunderstood, or whether there were both regulation 5(7) manufacturers and food manufacturers that do not meet regulation 5(7) classification.

Figure 2 shows the number of manufacturers by category for those categories with greater than 25 manufacturers. Table 2 in Appendix 2 contains the full results.

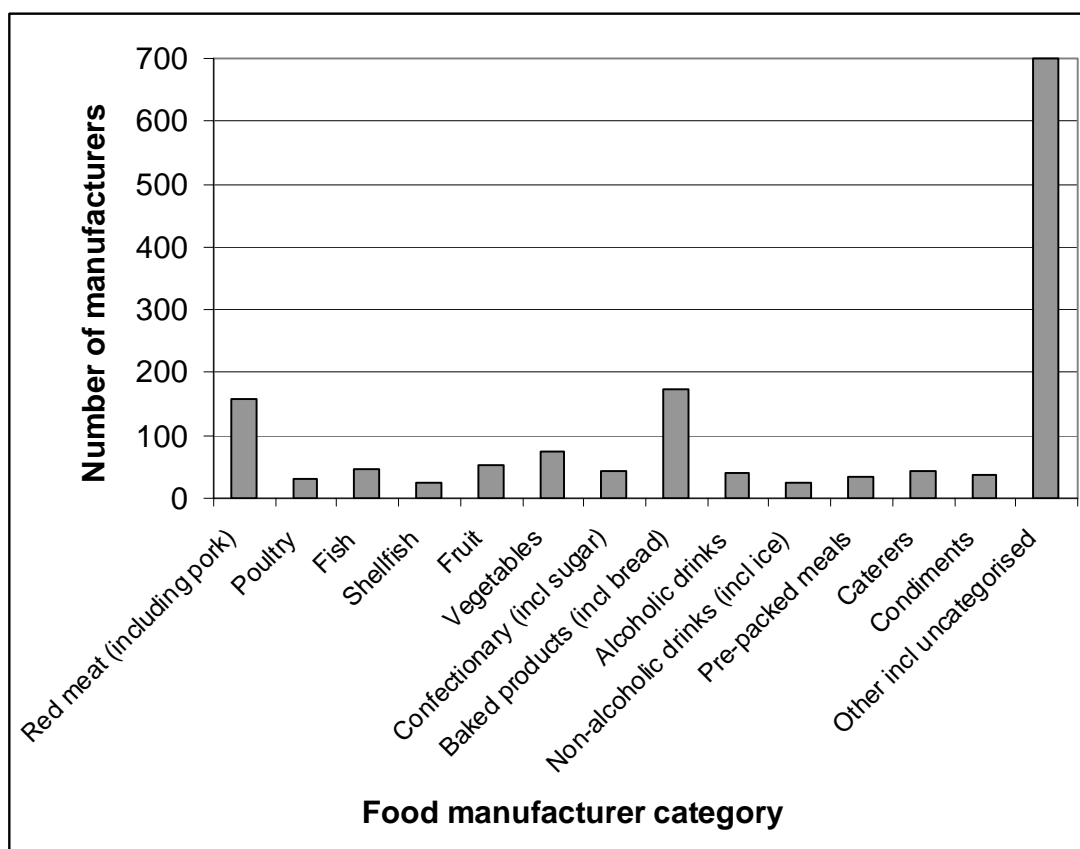


Figure 2: Food manufacture numbers by category

2.1.3 Employee numbers

Question 1 to 4 on food premises and manufacturers also asked for information on employee numbers. It was anticipated that only a few TAs would be able to provide this data. This proved to be the case; only 18% of food premises and 34% of food manufacturers have estimates of employee numbers, shown in Table 1. To boost this information, data was obtained from Statistics New Zealand, which can be viewed in Table 3 in Appendix 2. Given that the NZFSA survey data are very rough estimates, and that the Statistics New Zealand data are categorised and formatted differently, the results are comparable for food premises. The Statistics New Zealand data¹ show 80% of food premises to have less than five employees, the NZFSA data 77%. There is, however, some difference in the results for food manufacturers; Statistics New Zealand data have 56% with less than five employees, the NZFSA data 67%.

Table 1: Food business employee numbers

	Respondents	<3 staff	3-5 staff	>5 staff	Total
Regulation 4 food premises	18 (24%)	1865	1281	860	4006
Regulation 5(7) manufacturers	39 (53%)	236	152	187	575
Stats NZ – food premises		18,798			22,972
Stats NZ – food manufacturers		818			1462

¹ Data from the table building facility on the Statistics New Zealand website: <http://xtabs.stats.govt.nz/eng/TableViewer/>

2.1.4 Non-registered premises

Questions 5, 6 and 7 of the survey requested information on the numbers and types of food premises that are outside the scope of regulations 4 and 5(7) of the Food Hygiene Regulations.

It was expected that many TAs would have to estimate these numbers, an expectation that was reflected by comments from some TAs that these data are not collected as there is no obligation or reason to do so. Table 2 displays figures for non-registered, occasional, exempt and partially exempt premises. The interpretation of what should be registered and licensed varies across the country, with many exempt or partially exempt premises being registered and charged fees. Full results can be viewed in Table 4 of Appendix 2.

Table 2: Non registered food premises

Category	Number
Respondents (response rate)	60 (81%)
Non-registered premises	5508
Occasional food premises	9440
Exempt premises	3082
Partially exempt premises	1467

2.2 Resource requirements

The purpose of this section (Questions 8 to 15) was to discover the amount and type of resources currently used by TAs to fulfil their food-related responsibilities.

From the survey responses, there are 157.8 full-time equivalent Environmental Health Officers in 73 TAs spending, on average, 45% of their time on food issues (from a range of 5% - 90%). Thirty-four TAs, of which 32 are rural, employ one FTE Environmental Health Officer or less. The TA with the least FTE working on food issues has only 0.1 Environmental Health Officers; the most has 14. Sixty TAs employ an average of 1.3 non-Environmental Health Officer administrative and support staff, who spend 22% of their time on food issues.

Correlating the number of registered food premises and the number of Environmental Health Officers employed by TAs returns a value of 0.85, suggesting there is a relationship between the two. This type of information may be useful in the future for estimating the human resources required to implement any changes that may come out of the domestic food review.

2.2.1 Territorial Authority food activity breakdown

The survey sought to determine the amount of time TAs spend on food-related activities in a typical week. As would be expected given the huge range of premise numbers, the amount of time spent on food activities each week varies enormously, from 30 minutes to 474 hours. The 72 TAs who were able to provide data spend 3275 hours a week (170,300 hours a year) on food-related activities. Correlating the number of food hours and number of registered food premises returned a figure of 0.91 suggesting a strong relationship between these two variables.

The survey asked TAs to estimate the proportion of time they spend performing food-related duties in a typical week, the results of which are in Table 3.

Table 3: Activity

Activity	Respondents	Highest %	Median %	Lowest %
Registrations	64	40	10	2
Inspections	64	90	65	9
Investigating complaints	60	21	5	0.4
TA staff training	38	20	5	0
Information and advice to food premises	60	50	10	0
Other activities	24	25	5	2

The proportion of time spent registering food premises as given in Table 3 is a little deceptive. Almost all available time in the three to five weeks surrounding registration dates is spent on registering premises. Outside of this period, especially in areas with low business turnover, registrations take up much less time. Information and advice was considered by many TAs to form an integral part of inspection and registration duties and not easily separated. Activities in the 'other' category include inspection of occasional or exempt premises, food sampling, record keeping, bylaw implementation, and liaison with other food agencies and community groups.

2.2.2 External resource use

The survey also looked at TAs that outsourced food work. Nearly a quarter of TAs contract out all or some portion of their food work (see Table 4). TAs who contract out Environmental Health Officer-type duties do so because they either don't have enough work or enough resource to maintain an Environmental Health Officer position. In addition to these figures a number of TA's reported using contracting services to cover staff leave. The use of laboratory services to test food and water samples was relatively minor.

Table 4: Outsourced activities

	Number	Resource use
Contracting services – Environmental Health Officer and inspection duties	21(28%)	min 0.1, median 0.4, max 3
Laboratory Services – water and food testing	20 (27%)	Mostly infrequent <3 times a year Six TAs use lab service >4 times a year

2.2.3 Fees and charges

Questions 14 and 15 asked TAs to include their fees and charges and total revenue and to estimate how much of the total cost of food work is recovered by user fees. Fees, charges and revenue were so wildly different that it is futile to discuss averages or make statistical comparisons. Table 5 groups TAs by charging regimes. It is interesting to note that those TAs that base fees on an assessment of risk factors cover a greater charging range than all other methods. If this is read alongside section 2.3.6 (Inspection frequency) the links between the charging system and inspection assessment are apparent.

Table 5: Basis for charging fees

Fee basis	Flat fee all premises	Risk-based fee structure ²	Activity type	Ground area or seating numbers
Number of TAs	17	24	24	9
Fee range	\$50 - \$266	\$75 - \$1880	\$25 - \$743	\$115 - \$880
Number of premises (%)	2441 (11%)	6799 (30%)	7080 (31%)	6621 (29%)

Table 7 shows the range of cost recovery, which must be considered estimates as it is unclear whether TAs included overheads in their calculations. Eleven TAs were unable to provide any estimates.

Table 7: Cost recovery

	Minimum	Maximum	Median	Mode
Cost recovery	10%	147%	66%	100% (12 TAs)

Surprisingly, cost recovery is neither a function of premise numbers (with a correlation coefficient of 0.096 – see also Figure 3) nor population (correlation coefficient 0.119). This suggests that cost recovery is more of a policy decision than an economic one; twenty-three TAs, including those with large numbers of premises (see Figure 3) recover less than 50% of their costs.

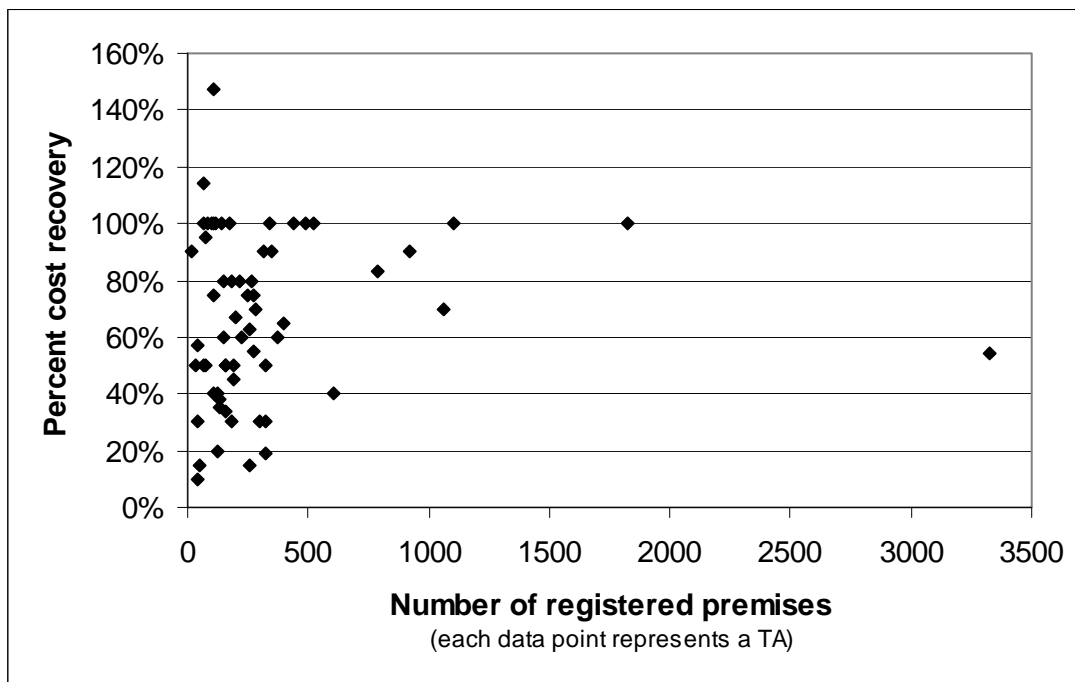


Figure 3: Cost recovery relative to premise numbers

Table 8: Total Revenue TA Food-related issues

² This includes two TAs that charge a flat rate per hour for inspections. Theoretically, the less risky and higher performing the premise, the quicker the inspection.

Size of population	No of TA	Total revenue	Minimum	Maximum	Median
<10,000	12	128,772	2500	28000	9600
10,000-30,000	17	666,379	9500	98500	27951
30,001-50,000	19	1,108,215	15000	333000	42500
50,001-100,000	13	1,237,008	24450	132550	105000
>100,000	7	2,888,245	144800	124300	241000
TOTAL	68	6,028,619			

2.3 Operational matters

2.3.1 Food strategies

Question 16 asked TAs to describe their strategy for implementing food responsibilities in their territory. In hindsight, this question would have benefited from some additional thought about its objective and more clarity in the wording. The responses tended to be very similar to responses regarding food priorities (Question 29), and in a number of cases appeared to express a performance measure or work programme rather than a strategy as such. The huge diversity in responses made it difficult to definitively summarise the comments, however, the table below groups and explains the responses received.

Table 8: Territorial Authority food strategies

Strategies	Number of TAs (percent)
No strategy	16 (22%)
Inspect/monitor food premises <ul style="list-style-type: none"> • Strategies included using inspections to promote environmental health quality and maintaining high standards of food monitoring. 	28 (38%)
Safeguard public health, meet environmental health standards <ul style="list-style-type: none"> • Strategies included safeguarding public health through regulatory controls, education and other methods, operating in a manner that ensures community health and safety and protection from hazards, and promotion of health standards resulting in community protection from risk. 	12 (16%)
Maintaining a high level of food safety awareness <ul style="list-style-type: none"> • Strategies included providing quality advice to improve the standard of food premises, educating people to accept the need for statutory requirements, develop and deliver education programmes, training for ethnic food handlers, implementing food premise excellence awards, and being more proactive with new premises. 	9 (12%)
Food business-related complaints <ul style="list-style-type: none"> • Strategies included ensuring a rapid response to complaints, and ensuring food-related complaints are investigated and resolved. 	5 (7%)
Providing high quality service <ul style="list-style-type: none"> • Strategies included having appropriately trained officers, matching the needs of the community, being effective and efficient in the provision of services, and providing excellent customer service to registered food businesses 	6(8%)
Recover costs <ul style="list-style-type: none"> • Strategies included implementing new food charges and recovering full inspection costs. 	3 (4%)

<p>Contract out food work</p> <ul style="list-style-type: none"> • While six TAs stated this as a strategy, an additional 11 contract out a large portion of their food responsibilities. 	6 (8%)
<p>Regulatory</p> <ul style="list-style-type: none"> • Strategies including providing a consistent interpretation of regulations, reviewing bylaws, and meeting the requirements of the FHR. 	13 (18%)

2.3.2 Performance measures

Table.9 Food Related Performance Measures

Summary of Types of Performance Measures	Number of TA (percent)
<ul style="list-style-type: none"> • Premises inspected annually. 	3%
<ul style="list-style-type: none"> • Register & inspect all registered premises – target % and timeframe. 	19%
<ul style="list-style-type: none"> • Premises inspected regularly. 	3%
<ul style="list-style-type: none"> • Premises inspected according to risk-based or performance based assessment. 	7%
<ul style="list-style-type: none"> • Service Request / Complaint resolved by defined time. 	12%
<ul style="list-style-type: none"> • No of complaints received. 	4%
<ul style="list-style-type: none"> • Surveillance of operations not required to be licensed. 	1%
<ul style="list-style-type: none"> • Premises not reaching Grade criteria. 	6%
<ul style="list-style-type: none"> • Food safety education promotion. 	3%
<ul style="list-style-type: none"> • Food Safety awards conducted. 	2%
<ul style="list-style-type: none"> • Food safety training of business operators. 	3%
<ul style="list-style-type: none"> • Meet legislative requirements. 	5%

• Reporting function's requirement.	5%
• Quality systems improvement.	2%
• Maintain & improve relationships with other agencies.	2%
• Improve & protect the health of residents.	3%

2.3.3 Food bylaws

Question 18 asked TAs to summarise any food-related bylaws in place or proposed. Twenty-six (35%) TAs have bylaws while a further 10 (17%) propose to put food bylaws in place. There were many similarities in bylaw provisions. The most common was a requirement for compulsory training and/or qualifications for food handlers (19 TAs (26%)), followed by provision for closures (12 (16%)), food safety provisions for specific premise types (food stalls, mobile traders etc) (9 (12%)), licensing and registration requirements (6 (8%)), display of premise grading certificate (6 (8%)), and details on premise grading systems (5 (7%)). Just under half of the bylaws contained provision for offences, penalties and appeals.

In addition to, or in some cases instead of, bylaws 13 TAs commented that they had developed information pamphlets on food issues, and many sent in copies. The pamphlets covered a range of topics such as safe handling of food, setting up a food business, running a food stall, transporting food, sausage sizzles, and hygiene standards at food fundraising events.

2.3.4 Food-related community outcomes

Question 19 on food-related community outcomes caused some confusion, mostly by TAs who did not know what was being referred to. Four of the 74 TAs (5%) made reference to community outcomes being part of Long Term Council Community Plans which were still under development. One stated that no food-related community outcomes had been raised during consultation, and another stated that one was being considered for 2004/2005. Of the 10 (14%) that described food-related community outcomes, providing for the safety and well-being of the community emerged as a common theme (also represented as ensuring safe and wholesome food and reducing the level of risk to the community).

2.3.5 Registration frequency

All TAs register food premises on an annual basis, as stated in the Food Hygiene Regulations, though one clarified this by saying annually or as specified on the registration certificate and another stated that premises are registered at least annually.

2.3.6 Food premise inspection frequency

Question 21 asked how frequently food premises are inspected. The responses (73 to this question) show a huge variation in both inspection frequency and decisions on how inspection frequency is determined, and as such it is meaningless to give averages. However, inspection regimes can be divided into three groups:

1. Annual inspections of all premises – carried out by 30 TAs (41%);
2. Twice annual inspections of all premises – carried out by nine TAs (12%);
3. Inspection frequency determined by the risk category or activity type of the premises – carried out by 34 Councils. This has two distinct groups within it:

- a. Basic risk category (A,B,C, low, moderate, high, Class 1, 2,3 etc) generally determined by activity type i.e. food preparation, eating house, butcher, storage, eating house etc – carried out by 26 TAs (36%). The lower risk categories or activities are most commonly inspected annually, while high risk activities are inspected up to four times a year; and
- b. Risk rating based on activity type and set criteria and judged against premises structure, staff conduct, practices, level of training, and cleaning and sanitising – carried out by eight TAs (11%). The risk rating determines the number of inspections a premise would be subject to, which range from once to twelve times annually. For these TAs the risk rating also determines the premises registration fee (section 2.2.3), and its hygiene grading scale (section 2.3.7).

From the descriptions above it is easy to see that similar food premises, or premises presenting similar risks, are subject to differing numbers of inspections depending on where in the country they are. This point is noted by one TA who commented it would like to see a national grading system to obtain consistency throughout New Zealand.

2.3.7 Hygiene grading scale

Question 22 asked TAs whether they used a hygiene-grading scale for public information purposes; 17 responded that they did, four are proposing to introduce one, 50 stated that they didn't and three said that they had a hygiene grading scale, but for internal use only. Those TAs using risk factors in premises assessment are using a hygiene grading system, whether or not the information is publicly displayed.

There were mixed comments about the merits or otherwise of hygiene grading scales. It was the opinion of one TA with a relatively small population (~17,000) that a publicly displayed notice would be counter productive in a small community where there is little real choice available to people on where they can purchase foodstuffs. Another stated that it didn't believe in hygiene grading scales; if a premise is unsatisfactory or presents hazards, it shouldn't be open for the sale of food. On the positive side, a TA who had implemented and actively promoted a grading system 18 months ago has noticed a significant increase in hygiene standards; the number of 'A' grade premises has increased 10% and the number of 'E' grade premises has decreased 70%.

A hygiene grading scale isn't the only way to provide public information, as shown by one TA that issues achievement awards for display to those premises that meet food safety training requirements.

2.3.8 Investigating food complaints

TAs were asked how many food-business related complaints they generally investigated a year. The responses (see Table 10) covered the range from a small TA (population 12,550) that stated it doesn't investigate any complaints (presumably because it doesn't receive any) to the 650-750 investigated by the largest TA (population 415,200).

Table 10: Complaints investigated by Territorial Authorities

TA population group	Average number of complaints investigated by each TA					
	< 5	5 – 10	11 – 15	16 – 25	26 – 50	> 50
< 10,000	7	4	3	1	0	0
10,000 – 30,000	6	5	4	4	2	0
30,001 – 50,000	1	3	4	2	3	1
50,001 – 100,000	0	2	2	3	5	1

> 100,000	0	0	0	0	0	8 (ranging from 50 to 750)
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As an estimate, across all of New Zealand there are around 2288 food business-related complaints a year. This is an approximation as just over half of those that responded to this question gave a range as opposed to an average. Partly this is because of the nature of food complaints, and partly because these data aren't collected by all TAs. Although the figures returned are accepted as rough estimates, it is still interesting to note that correlating the number of food complaints to the number of premises returns a value of 0.91, suggesting that food complaints in a district are a function of the number of premises. While this appears to be a logical result, it is good to confirm for the simple reason that a non-correlation would have been even more interesting and warranted further examination.

2.3.9 Training

TAs were asked (Question 24) how many days are set aside for training employees implementing food responsibilities. The responses were interesting as there seemed no particular pattern to the results. The question wasn't applicable to eight TAs, primarily because they contract out food work. Twenty-seven TAs said that no days were allocated to training. While, as could be expected, around half of the smaller TAs (population <30,000) that answered this question had no training days, a third of medium sized TAs and, surprisingly, a quarter of large TAs (population >100,000) also stated that they had no training days.

What wasn't clarified though was whether staff truly had no allocated training days, or whether through work commitments were unable to undertake any training; it is easy to answer nil if you haven't been on a course, when in fact training may have allocated budget. The largest TAs allocated the most days to training, up to 20.

2.3.10 Providing information and advice to food premises

The survey asked TAs to estimate how many hours a month they spend providing information and advice to food premises (Question 25). The responses confirmed that this is a fundamental service provided by Councils, and is often an integral part of premises inspection. For this reason, 15 responders were unable to provide an estimate. The 59 TAs (80%) that responded to this question devoted 1899.5 hours/month providing advice and information to 16,875 premises i.e. 0.1125 hours/month per premise. Extrapolating this to all 22,941 premises on a yearly basis gives an estimate of 30,913 hours. While this is an approximation, it does suggest that providing food-related information and advice is a significant activity. It is likely that for some premises, inspections are the only contact that premises have with a food safety professional.

2.3.11 Operational system support

The focus of the questions under this heading (Questions 26 to 28) was to find out the types of operational systems that TAs use to help them keep track of their food-related activities.

Fifty-nine TAs (80%) use some kind of information management system for their food-related activities, of which 46 limit access to this information e.g. environmental health staff only, council staff only or access within the bounds of the Privacy Act. The systems themselves range from simple in-house developed spreadsheets and databases to specialised software programmes tailored to suit their requirements such as GEMS, Corporate Vision, Origin Technology and Proclaim.

Around the same number of TAs (57) have a contacts database that records premise-related contact details and lists all registered food premises within their territorial boundaries.

Far fewer TAs (37 or 50%) have any quality management systems related to their food activities. Seven have ISO accreditation with a further three intending to gain accreditation. Of the remaining TAs, 24 run in-house systems that are audited internally by management or other staff, and four are audited externally by Audit New Zealand or IANZ.

It would be easy to assume that smaller TAs, with fewer customers and less resources, are unlikely to have quality management systems. This is not the case. Figure 4 shows that TAs with populations over 50,000 almost always have a quality management system, but so do a number of smaller TAs.

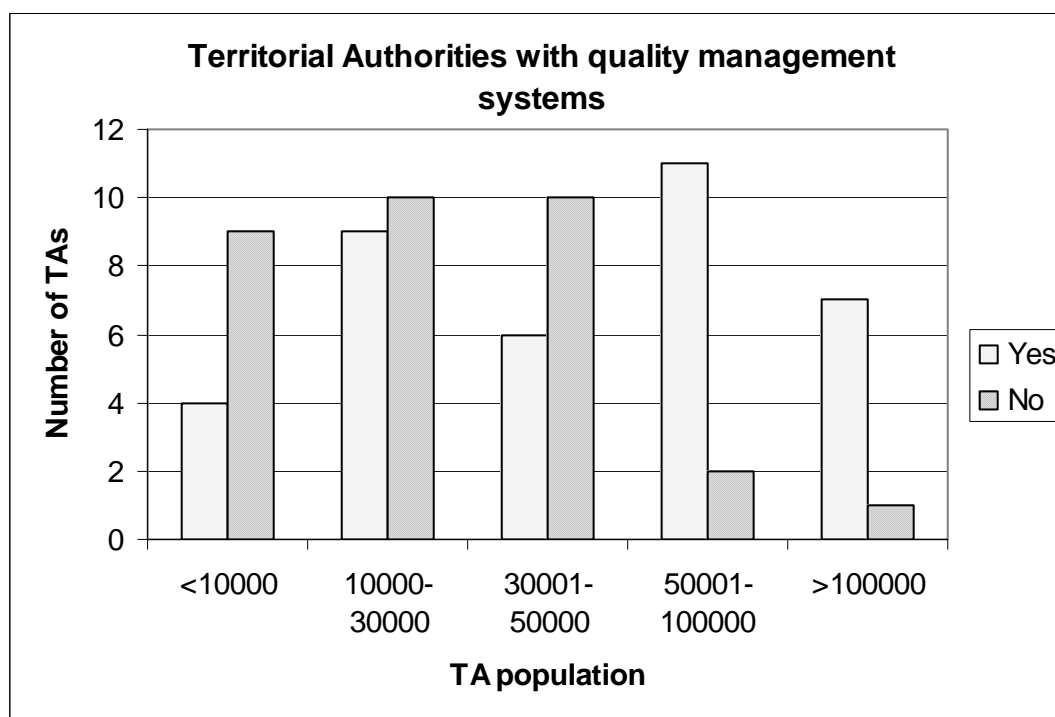


Figure 1: Territorial Authorities with Quality Management Systems by Population

2.3.12 Food priorities

Question 29 asked TAs to list their most important food-related priorities. While there was great diversity in the priorities described by TAs, there were many similarities in the outcomes desired. The table below bands the priorities into broad outcomes and then lists the priority groups beneath.

Table 11: Territorial Authority food priorities

Priority	Number of TAs
No food priorities	13
Premises inspection <ul style="list-style-type: none"> • Inspecting premises according to inspection regime • Implementing risk-based inspections 	36 4
Registering premises (including two TAs that wanted to develop and implement a more proactive approach to identifying food premises)	10
Food-business related complaints	

<ul style="list-style-type: none"> Investigating complaints within guideline criteria Reducing number of complaints Provision of complaint reporting system for public use 	<p>14</p> <p>1</p> <p>1</p>
Regulatory <ul style="list-style-type: none"> Encouraging compliance with Food Hygiene Regulations Promoting Food Safety Programmes Implementing new bylaw 	<p>10</p> <p>3</p> <p>1</p>
Safe food <ul style="list-style-type: none"> Ensuring hygiene practices in premises Protecting community health and welfare Reducing incidence of food-borne illness Reducing the number of poor performing premises and increasing the number of high performing premises Collecting samples from premises 	<p>12</p> <p>7</p> <p>6</p> <p>5</p> <p>1</p>
Food safety awareness (this included promoting food handler training, licensee qualifications, educational campaigns etc)	<p>22</p>
Customer service <ul style="list-style-type: none"> Meeting customer service goals Maintaining working relationships Providing information and advice to premises, including one TA that is focussing on food stalls this year Communicating with ethnic food business owners 	<p>8</p> <p>1</p> <p>5</p> <p>1</p>
Increasing cost recovery	<p>2</p>

2.4 Issues and solutions

This aim of this section, the last in the survey, was to provide TAs with the opportunity to comment on the issues they face in undertaking their food obligations and the solutions they had developed to solve these. Given there were no prompts, there was a large degree of commonality in the responses. There were five key topics discussed: geographical isolation, communication difficulties with premise owners who speak little English, the workload and resourcing of Environmental Health Officer work, the outdated nature of the legislation, and the perceived lack of priority given to food issues by the Ministry of Health.

2.4.1 Regulatory issues

The inadequacy of the current legislation was a popular topic and received substantive comment. Eighteen TAs covered this issue, with most offering the opinion that the Food Hygiene Regulations 1974 are outdated and do not reflect current technology or food safety principles and practice. One summed it up succinctly by saying that the current legislation can at best only provide occasional snapshots of premise quality.

Many gaps were highlighted by TAs. Specific comments mentioned the lack of provisions regarding training qualifications for food handlers and occasional food premises. Most TAs who commented regard the current exemptions under the Food Hygiene Regulations as illogical and not based on risk at all. Several stated that the prescriptive nature of the requirements tends to focus on physical standards rather than risk factors. One TA contrasted the lack of qualification requirements under the Food Hygiene Regulations with the Sale of Liquor Act 1989 which requires certain persons to hold qualifications regarding the sale of liquor. If this comment is read alongside the summary of responses to the bylaw question, it becomes obvious that TAs have responded to the same issues in a similar way; 18 TAs have introduced a bylaw requiring food handler qualifications and/or training.

There was a general consensus that Environmental Health Officers needed more powers regarding the closure of premises, that current penalties are inadequate and that there is a lack of infringement processes. One TA said that it would like the ability to impose instant fines to encourage dirty or poorly performing food premises to comply with the regulations.

Still on the topic of exemptions, one TA stated that premises registering Food Safety Programmes (and thus gaining exemption from the Food Hygiene Regulations) had reduced the income they received and the remaining premises registration fees have had to rise to cover costs. On the one hand they expressed concern that if income continued to drop they would have to reduce Environmental Health Officer numbers, and then on the other hand they stated that they had expanded the services they provide by contracting out environmental health services to other TAs and by providing auditing services for FSPs.

Uncertainty on the future of the legislation is an issue in some areas. One TA stated it has made no attempt to advise registered premises on likely changes to food safety regulation and another stated that the uncertainty has been a stumbling block in educating premises, owners. Some have refused to implement any kind of risk analysis not prescribed by legislation and there is reluctance to accept higher costs and change towards a food safety programme. This opinion was backed up by another TA that said there is no real incentive for food premises to change to a hazard-based approach. Regulatory requirements should be considered complimentary to FSPs otherwise the step is too difficult.

Two TAs did mention some positive attributes about the Food Hygiene Regulations. One stated that the current registration system offers the best administration system for food safety, particularly for small and medium sized businesses, and the other stated that while the Food Hygiene Regulations can be improved, they are basically sound and it is important that TAs retain the function of maintaining food hygiene in their districts. This last comment contrasts other comments made by a TA that stated New Zealand needs a one stop shop for food, and TAs are not necessarily the best place for this. Other TAs commented on the need for a national food grading system and the need for a consistent auditing system for all TAs.

2.4.2 Workload and resourcing of EHO work

Twelve TAs mentioned that their main problems centered on the number and variety of duties covered by Environmental Health Officers, and that there are insufficient staff for the workload. Task allocation is often difficult and TAs with few Environmental Health Officers have to spread them thinly across a wide spectrum of responsibilities, e.g. Building Act, noise control etc. Several comments stated that Environmental Health Officers that have many

other functions have little time to take food safety seriously. This also impacts on training as staff have to maintain skills in many areas.

One TA mentioned the conflict between proactive and reactive work. To cope with this, it was trialling a system to reduce the amount of time spent on non-essential inspection in order to free up time to take on board those food premises that are not required to be registered.

One small rural TA commented that food safety is not seen as a priority because the 30 year old regulations have no profile within management, compared to the high profile of the Building Act since the publicity of 'leaky buildings'.

Contracting was a popular solution for those TAs that either do not have enough work or resources for a full time Environmental Health Officer, or had too much work for the Environmental Health Officers they had. Contractors come from the private sector and from other TAs. One TA mentioned it was also looking at joint service delivery options with other TAs. However, contracting is not the solution for all. One TA did not like the idea of contracting work out; it wanted more administrative staff in order to free up Environmental Health Officer time.

2.4.3 Geographical issues

For small, rural TAs, location and geography has particular challenges and was specifically mentioned by eight TAs. Rurally-centered districts are typified by large areas, low population density, a few small towns and urban areas and long distances between premises. Travel time was significant for the majority of these TAs where it can take several hours of driving for only a few inspections. Several commented that if full costs were charged to these premises it is likely that a number would not survive, which contrasts with Figure 3 that shows that even TAs with low premises numbers can recover all their costs. One TA commented that it didn't want to penalise isolated food premises under a full cost recovery system, so it applies a standard travelling fee, i.e. urban premises are subsidising rural ones.

Food premises in rural areas are typically small, family-owned, and long term; they provide a service just by being there, and the issue of community service versus financial viability has to be considered by rural TAs. This can bring its own problems; a TA that has only one Environmental Health Officer has found enforcement is becoming difficult as local businesses have seen the same Environmental Health Officer for many years.

Two TAs felt that rural areas will always face difficulties and high costs if full audit systems are used as the main regulatory mechanism. One used the challenges of implementing the Building Act as an example and said how difficult it is to hire a private certifier as there are so few in the area. Sourcing external solutions can add significant costs to isolated businesses that already have limited access to modern information and training courses.

2.4.4 Language and culture issues

Seven TAs, all in the North Island, have premises operators with whom they experience communication difficulties due to language capabilities. Working with business owners who do not speak fluent, or technical, English makes it difficult to convey food safety information and responsibilities.

Several strategies were suggested or had been put in place to deal with these. One TA has developed food safety information booklets in several languages that are being used by several other TAs. One TA also uses a local translator. Another TA stated that language difficulties and cultural differences to food safety principles diminish when the business owners make a long-term commitment to living in New Zealand and operating the business.

One contractor who works for four TAs in the South Island, although they made no mention of any problems communicating with persons from other cultures, did suggest that consideration be given to initiatives in different languages.

2.4.5 The past

A number of TAs aired their dissatisfaction regarding the old Ministry of Health (MoH). There were complaints that the MoH had not been proactive and gave examples that highlight the level of frustration and the perceived lack of commitment shown by the MoH on food issues.

One TA stated that the MoH did not improve food controls or provide decent direction and training, which has resulted in the fragmentation of the food control industry, creating a situation where some businesses are inspected by at least three different agencies and private firms. Another TA stated that interim measures should have been put in place to keep the focus on food safety. Another expressed dissatisfaction that they had to introduce solutions using bylaws regarding training requirements and grading of food businesses that they felt should have been driven by the MoH.

While focussing on the past, one response highlighted the continuing lack of information flow from central government and suggested that a central literature resource be developed for TAs and audit bodies to use.

2.4.6 General comments

There are two other noteworthy comments not covered elsewhere. One TA stated that compared to other industries, the food industry has no professional back up: liquor licensing is supported by the Liquor Licensing Authority, the Resource Management Act by the Environment Court, the Building Act by the Building Industry Authority. To ensure that a food licence has similar credibility as a resource consent, a liquor licence and a building consent, there needs to be a national body that issues and supports it.

One TA brought up the issue of cost recovery. In their district they did not recover all food costs, i.e. ratepayer funding is required. They queried how much more the ratepayer or the food operator should pay. It was their view that central government has a public health responsibility and should contribute more funding to enhance services and ensure safe food.

3 Conclusions and Recommendations

The results of the New Zealand Food Safety Authority survey of Territorial Authorities have built a picture of inconsistency and diversity in the implementation of the Food Hygiene Regulations. While diversity is often a cause for celebration, when it is due to a lack of national direction and legislation for the majority that is far removed from the risk-based food safety industry environment we operate in, change is necessary.

The survey reveals a picture of TAs that have spent time and resources developing individual systems and processes to fill the gaps in coverage and food safety tools left by the Food Hygiene Regulations in order to ensure safe food and protect their communities from the risk food borne disease. As a result, inconsistencies in the grading of premises, premises inspection frequency, inspection criteria and fees and charges occur. It has also created a situation where businesses that undertake similar activities, or present similar risks, are subject to differing food regimes by virtue of geographical location.

The Domestic Food Review presents an excellent opportunity to get back to basics in terms of collecting and collating data and the survey results provide an excellent platform for focussing on some of these basics.

It is recommended that the NZFSA work with TAs to develop and implement a consistent method for registering and categorising food premises and manufacturers. It is also recommended that the NZFSA work with TAs to establish national standards for data collection and that a national method of evaluating food premises be adopted. The risk - based assessment used by some TAs appears to be a good starting point for developing a fair method for consistently responding to the complexity and diversity in the domestic food sector. Once these issues have been worked through, it would be valuable to repeat the survey process by asking TAs to collect data about food premises information from the start of a registration year, and comparing the results a year later against the results of this survey.

If the basics are not sorted out now, the risk is that it will not happen. It will be a lengthy and difficult process working to achieve the outcomes of the recommendations above. However, if equitable treatment of food premises and clarity about the make-up of the domestic food sector is desired, then the current situation of inconsistency and diversity is not tenable in the long term.

Appendix 1 – TA survey



DOMESTIC FOOD REVIEW

DECEMBER 2003

SURVEY OF TERRITORIAL AUTHORITIES

The New Zealand Food Safety Authority (NZFSA) has started a major re-think of New Zealand's domestic food controls; the first time in 25 years that this has been undertaken. One of the first stages is to gather data about the nature, type and distribution of premises that handle, prepare, manufacture or sell food in New Zealand and to document how food legislation is administered at a local level. This information will inform the domestic food review, and help develop and assess the impact of proposals that may come out of it. The enclosed brochure provides more information about the review.

The purpose of this survey is to collect some baseline data. There are four parts. These focus on gathering information about food premises, understanding how Territorial Authorities implement their food responsibilities, the resources required to do this, and any issues associated with meeting their obligations.

Some questions in this survey require extra documentation (i.e. questions 14, 16, 17, 18, 19, 21, 22, 29). We anticipate that the information for these questions is held electronically within your organisation, and that you will be able to print and append these to the survey.

If you have any queries about the survey, or would like some assistance to complete it, please contact:

Lisa Winthrop

or

Carolyn Stone

(04) 463 2590

(09) 361 2584

(021) 560 174

(027) 439 3791

Lisa.Winthrop@nzfsa.govt.nz

Carolyn.Stone@nzfsa.govt.nz

Please return completed surveys to:

Lisa Winthrop

Policy and Regulatory Standards

New Zealand Food Safety Authority

PO Box 2835

WELLINGTON

by **Tuesday 20 January 2004**.

Appendix 1 – TA survey

Contact details

Name: _____ **Phone:** _____
Title: _____ **Fax:** _____
Territorial Authority: _____ **Email:** _____

Section 1: Benchmarking Data

The purpose of this section is to estimate the number and sizes of premises in New Zealand that are involved in the manufacture, preparation, handling or sale of food.

Registered food premises

1. How many premises are registered under the regulation 4 of the Food Hygiene Regulations or the Health (Registration of Premises) Regulations 1966 within your territory?
2. Do you register food premises under different categories (e.g. supermarkets, restaurants, fast food franchises, wet fish, butchers, delicatessens, eating houses, service stations etc)? If yes, please list these categories and the number registered within each in the table below. If you are able to provide any information about the number of employees (full and part-time) of these premises, please include this in the last columns of the table below. Estimates are acceptable where actual figures are not available.

Type of premise (please list)	Number registered	Number of employees		
		<3 staff	3-5 staff	>5 staff

3. How many food manufacturers are registered under regulation 5(7) of the Food Hygiene Regulations within your territory?

Appendix 1 – TA survey

4. Please fill in the following table for regulation 5(7) manufacturers as much as possible. For the purposes of this question, 'processed' refers to a manufacturing step that reduces the potential for microbes in that food product, e.g. canning, heat treatment, adding salt, or fermentation. For manufacturers that produce a mixture of food products (i.e. they could be placed in two or more categories), please list them by predominant product type and place the number of mixed product manufacturers in parentheses to separate them from single product manufacturers. If you are able to provide any information on the number of employees (full and part-time) of these manufacturers, please include this in the last columns of the table below. Estimates are acceptable where actual figures are not available.

Type of manufacturer	Number registered	Employee numbers		
		<3 staff	3-5 staff	>5 staff
Red meat (including pork) Fresh/Frozen Processed				
Poultry Fresh/Frozen Processed				
Fish Fresh/Frozen Processed				
Shellfish Fresh/Frozen Processed				
Milk (include cheese producers) Raw Pasteurised				
Egg pulp				

Appendix 1 – TA survey

Fruit				
Fresh/Frozen				
Processed				
Vegetables				
Fresh/Frozen				
Processed				
Other categories (please list)				

5. Please list the number and types of occasional food premises registered (e.g. food stalls, food festivals) in your territory last registration year.

Type of occasional food premises (please list)	Number registered

Premises not requiring registration

6. Within your territory, how many food premises are not required, under regulation 4(4) of the Food Hygiene Regulations, to be registered food premises?

Appendix 1 – TA survey

7. Can you provide information on the types and numbers of exempted and partially exempted food premises (e.g. motels, homestays, prisons, hospitals, work place canteens etc.)? Do not include those premises that are registered under the Meat Act, the Animal Products Act or the Dairy Industry Act. If you do not store the following data, your local knowledge or research would be appreciated.

<p>Exempted premises</p> <p>Prisons</p> <p>Homestays</p> <p>Motels</p> <p>Other premises falling within the non-registerable categories of regulation 4(4) (please categorise)</p>	<p>Number</p>
<p>Partially exempted premises</p> <p>Hospitals</p> <p>Residential homes</p> <p>Educational facilities</p> <p>Work place canteens</p> <p>Others (please list)</p>	<p>Number</p>

Appendix 1 – TA survey

Section 2: Resource Requirements

The purpose of this question is to establish how much, and what type of, resources are currently required by Territorial Authorities in order to implement food-related legislation.

8. How many full-time equivalent environmental health officers are employed by the Authority?
 - a. What percentage (to the nearest 10%) of their time is spent on food-related activities?
9. How many other full-time equivalent staff are involved in meeting food-related responsibilities? (e.g. management, support or other staff)
 - a. What percentage (to the nearest 10%) of their time is spent on food-related activities?
10. How many hours does your Authority spend on food-related activities in a typical week? (We will be scaling this up to an annual figure, so please ensure your week is 'typical').
11. Of the total time your Authority devotes to food activities each week, please estimate the percentage (to the nearest 10%) devoted to each to the following activities.
 - a. Registrations
 - b. Inspections
 - c. Investigating food business-related complaints
 - d. Training and professional development for food staff
 - e. Information and advice for food businesses
 - f. Other activities (please list)
12. Does your Authority employ contractors or consultants to undertake food-related activities?

If yes:

 - a. How many FTEs are contracted?

Appendix 1 – TA survey

- b. What activities are they contracted for (e.g. technical services, administrative support)?

Appendix 1 – TA survey

13. Do you use any food-related services (e.g. laboratory or sampling services)?

If yes:

a. What types of services are used?

b. How frequently are they used?

14. How much do you charge, and what is the associated per annum revenue, for each of the following activities? If you use a graded or risk-based scale for different premises or level of risk, please attach the relevant information, including an explanation of any categories used.

Activity	Charge per registration or inspection	Revenue per annum
Premises registration fees		
Additional inspection fees for food businesses		
Other food-related charges or fees (please list)		

15. What percentage of your total food-related costs are recovered from user charges?

Appendix 1 – TA survey

Section3: Operational Matters

The purpose of this section is to document the strategies used by Territorial Authorities to meet their food-related responsibilities.

Delivery framework

16. Please summarise, or attach, your strategy for implementing food responsibilities in your territory (i.e. from annual and/or business plans, or other documentation).

17. Please summarise, or attach, any performance measures (e.g. key performance indicators) related to administering your food-related responsibilities.

18. Please summarise, or attach, any food-related by-laws in place or proposed (e.g. by-laws on food safety training; how food festivals are to be run etc).

19. Please summarise, or attach, any food-related community outcomes already incorporated, or being incorporated, into planning documentation.

20. How often are food premises required to renew their registration in your territory?

Appendix 1 – TA survey

21. How frequently are food premises inspected? If you use a graded or risk-based scale for different businesses, please attach the relevant information, including an explanation of any categories used. If this is covered by your by-laws, please indicate this.

22. Does your Authority use a hygiene-grading scale for public information purposes? (e.g. for public display in eating houses). If yes, please describe or attach.

23. How many food business-related complaints do you generally investigate in a year?

24. Please estimate the number of days per year allocated for food-related training of staff in your Authority who are involved in food activities (a ballpark figure on the total hours for all staff is sufficient).

25. Please estimate the number of hours per month devoted to providing information and advice to food premises on how to meet their food-related obligations.

Operational systems support

26. Do you have any information management systems support (e.g. databases) for your food-related activities?
 - a. If yes, are there any access restrictions on these systems?

27. Do you have a contacts database that records premises-related contact details?
 - a. If yes, does this include a contacts database that lists all registered food premises in your territory?

28. Do you have any Quality Management Systems related to your food activities (e.g. records, requisitions, tracking etc)?

Appendix 1 – TA survey

- a. If yes, please provide a brief description. If you have ISO accreditation, please specify.

Appendix 1 – TA survey

Section 4: Issues and Solutions

The purpose of this section is to identify any issues and problems Territorial Authorities face in meeting their food responsibilities.

29. Please summarise or attach the three most important food-related priorities for your Authority (i.e. identified in annual or business plans).

30. Do you face significant problems in carrying out your food-related responsibilities? If yes, please provide a brief explanation.

31. Have you identified any solutions for coping with these problems?

32. Do you face any limitations or constraints in implementing these solutions?

Please provide any additional comments you may wish to make

Appendix 2

Table 1: Regulation 4 food premises

Number of respondents	74
Population covered ³	4008760
	Number of premises
Total registered premises (74 respondents (100%))	22941
Most premises	3324
Least premises	15
By categories (67 respondents (91%))	
Population covered 3,802,856	
Eatinghouses including restaurants, cafes, brasseries, and refreshment rooms	5512
Club, hotel, tavern, bar	346
Bakeries	667
Delicatessens	141
Groceries and supermarkets	1018
Supermarkets	149
Grocery/Dairy/Prepacked foods/Health foods	1216
Service stations	304
Meat, fish, poultry	506
Takeaways, fast foods, lunchbars	2077
Fruit & vegetable retailers	332
Food manufacture/preparation/processing/packaging	722
Honey processing/packing	86
Caterers	96
Brewery/winery/bottling plant	12
Distributor	23
Canteens	7
Mobile shops/stalls/hawkers	361

³ All population figures are Statistics New Zealand estimated resident population figures as at 30 June 2003

Appendix 2

Auction marts	11
Trading depots/salesyards	7
Other premises, including those unable to be categorised	8894

Table 2: Regulation 5(7) food manufacturers

Number of respondents (response rate)	71 (96%)
Population covered	3869420
Total	1684
Most manufacturers	236
Least manufacturers	Two TAs had no manufacturers
By categories (62 respondents (84%))	Number of manufacturers
Red meat (including pork)	157
Poultry	32
Fish	47
Shellfish	26
Milk (including cheese)	14
Eggs and egg pulp	18
Fruit	53
Vegetables	75
Confectionary (including sugar)	42
Baked products (including bread)	173
Alcoholic beverages	39
Non-alcoholic beverages (including ice)	26
Pre-packed and cook-chill meals	34
Caterers	43
Nuts	10
Edible oils and fats	11
Coffee beans and tea repackaging	15
Condiments, preserves, vinegar and gourmet foods	38

Appendix 2

Dietary supplements and health foods	16
Flour, cereals and grains	10
Honey	126
Other including those unable to be categorised	699

Table 3: Statistics New Zealand employee size groups in food businesses 2003⁴

Type of business	Full time equivalent size groups					
	0 to 5	6 to 9	10 to 19	20 to 49	50 to 99	100+
Pubs, taverns, and bars	716	308	234	57	7	4
Cafes and restaurants	3041	1111	712	211	32	11
Clubs (hospitality)	231	87	50	21	0	0
Food retailing	7405	874	363	141	72	73
Supermarket & grocery stores	2104	214	66	66	68	69
Specialised food retailing	5301	660	297	75	4	4
Totals	18,798	3254	1722	571	183	161
Manufacturing						
Meat and meat product	107	19	29	34	18	26
Dairy product	35	13	5	5	5	7
Fruit and vegetable	61	5	15	12	6	7
Oil and fat	31	3	2	2	1	0
Flour mill and cereal food	18	5	5	2	1	2
Bakery product	91	33	33	21	9	8
Other food	309	83	67	5	23	21

⁴ Data from the table building facility on the Statistics New Zealand website:
<http://xtabs.stats.govt.nz/eng/TableViewer/>

Appendix 2

Beverage and malt	166	43	32	28	1	8
Totals	818	204	188	109	64	79

Table 4: Non registered food premises

Respondents (response rate)	60 (81%)	Non-registered premises	545508
Occasional food premises	9440	Exempt premises	3082
Food stalls	8170	Prisons	18
Mobile shops	274	Motels/lodges/resorts	559
Festivals, events, fairs	262	Homestays/B&B/hostels	1125
Hawkers	16	Club/hotel/tavern/bar/on-licence	506
Food stalls and mobile shops	217	Camping ground	19
Fundraising/charity	168	FSP exempt	53
Markets	14	School canteen	6
Sausage sizzles	319	Other (<3 including marae, churches, milk depot, farm gate sales)	627
		Exempt premises not specified	169
		Partially exempt premises	1467
		Hospitals	116
		Residential/rest homes	345
		Educational/child care facilities	574
		Work place canteens	373
		Other (<2 respondents including ferries, charitable organisations, public halls)	59

While it was difficult to obtain information to enhance the data relating to the numbers of occasional and exempt/partially exempt premises, the Statistic New Zealand website did provide some numbers of exempt premises. In New Zealand there are:

- 1093 pre-school education facilities;
- 2693 schools;
- 126 post-school educational facilities;

Appendix 2

- 2324 other educational facilities;
- 689 child care services; and
- 1670 community care services.