Ministry for Regulation
Te Manatū Waeture

APPENDIX D : Part III

What we heard from submissions – Options for change

Hospitality Review

July 2026

Introduction and Context

This set of slides presents a summary view of the quantitative and qualitative information received by the Hospitality Regulatory Review (the Review) during the third round of targeted engagement. It is a summary and synthesis of submitters' views and opinions, and therefore will not fully reflect the views of any one submission, nor has it been fact-checked for the purposes of these slides.

This summary is not the Ministry's view on the regulatory systems that affect the hospitality sector. The information received through this engagement process was analysed alongside other evidence to inform the Review's priorities, help us to identify regulatory issues, and form our recommendations.

Survey construction

Two surveys were presented on the potential options for change – one to the sector (including territorial authorities) and one to territorial authorities only.

The sector survey allowed input from sector representative groups, hospitality businesses, territorial authorities, district licensing committee (DLC) members, and others. There are two topics covered in the survey to these parties: food and alcohol.

The territorial authority specific survey asked targeted questions regarding two more topics: fees & levies and information flows.

We understand sector representative groups who responded to our survey, surveyed their members and collated responses. As a result, these entities have not always taken a single strong position and instead discuss the merits of each option. For these reasons, and because the regulator responses far outnumber those of sector representative groups, we have not directly compared the two respondent categories in most cases.

Some territorial authorities responded to only one of the two surveys. Their responses are only included for the survey they completed. For territorial authorities that submitted more than one response, we have only counted that as one response. However, some territorial authorities did not disclose their region in their response, meaning it is possible that some responses we have counted are from the same territorial authority.

All response information is broken down across the four categories: alcohol, food, fees and levies, and information flows.

ONE

Who submitted to this targeted engagement?

Who submitted to targeted engagement?

Role of submitters in the hospitality sector

Group	Number
Hospitality businesses	6
Organisations representing the sector	6
Territorial authority (or employee thereof)	39
District Licensing Committee member	7
Other interested parties	2
TOTAL	**60**

For the purposes of this analysis and to maintain submitter anonymity, parties have been grouped into two categories – regulators and regulated parties. Regulators include the territorial authorities and DLC members, and the organisation that represents the interests of the regulator. Sector representative groups represent the interests of hospitality businesses.

Which territorial authorities have we heard from?

Councils and associated DLCs

Far North District Council
Auckland Council
Hamilton City Council
Waipa District Council
Taupō District Council
New Plymouth District Council
Ruapehu District Council
Marlborough District Council
Palmerston North City Council
Masterton District Council
Porirua City Council
Kāpiti Coast District Council
Nelson City Council
Tasman District Council
Queenstown Lakes District Council
Southland District Council
Invercargill City Council

Thames-Coromandel District Council
Tauranga City Council
Whakatane District Council
Opotiki District Council
Gisborne District Council
Wairoa District Council
Hastings District Council
Napier City Council
Central Hawke's Bay District Council
Carterton District Council
Hurunui District Council
Upper Hutt City Council
Hutt City Council
Wellington City Council
Waimakariri District Council
Ashburton District Council
Waitaki District Council
Dunedin City Council
Clutha District Council

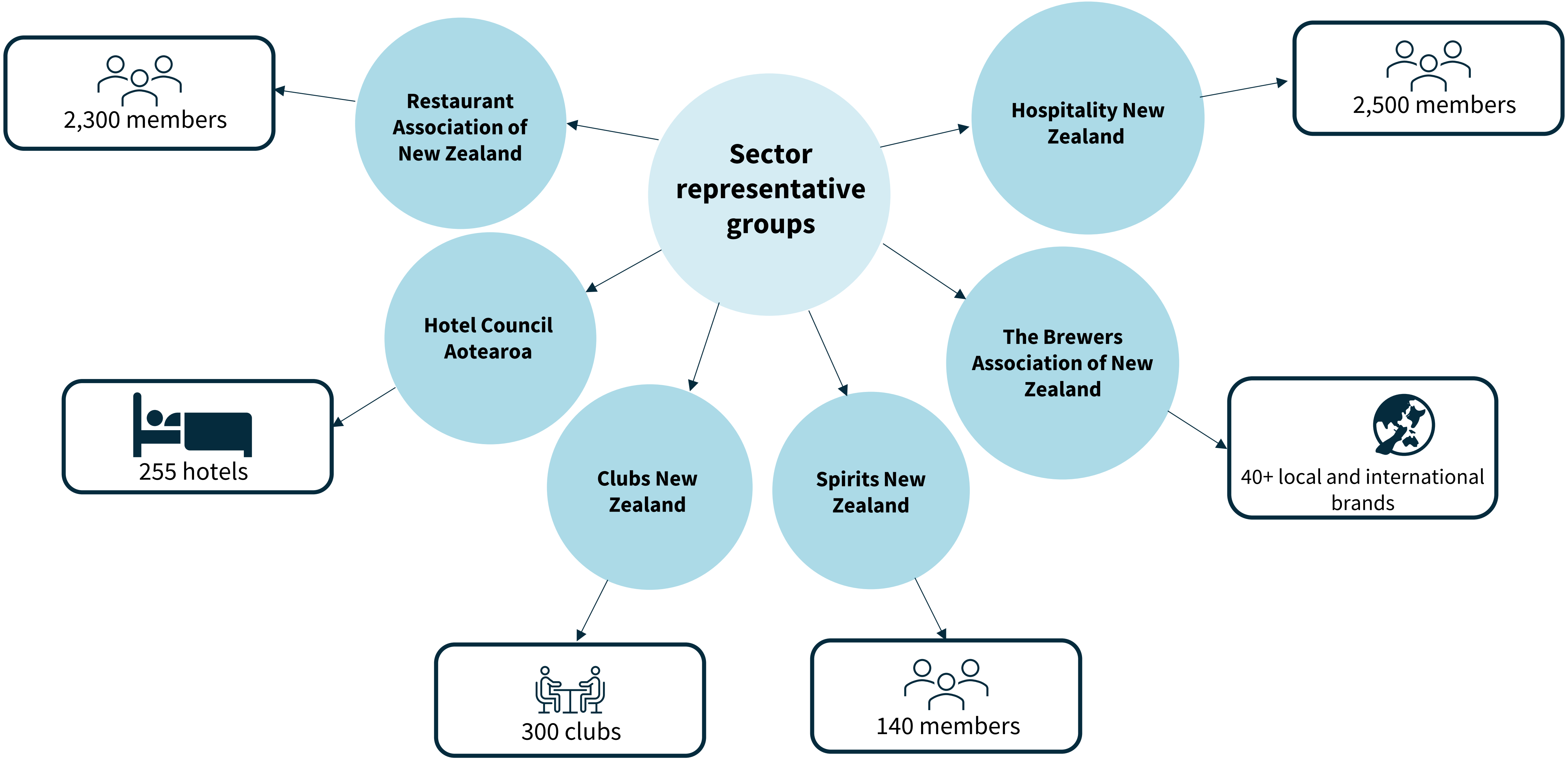
66% of responses were from the North Island*

34% of responses were from the South Island*

*This is representative of the distribution of local authorities across the North Island and South Island

Who is representing the hospitality sector?

Sector representative group membership



TWO

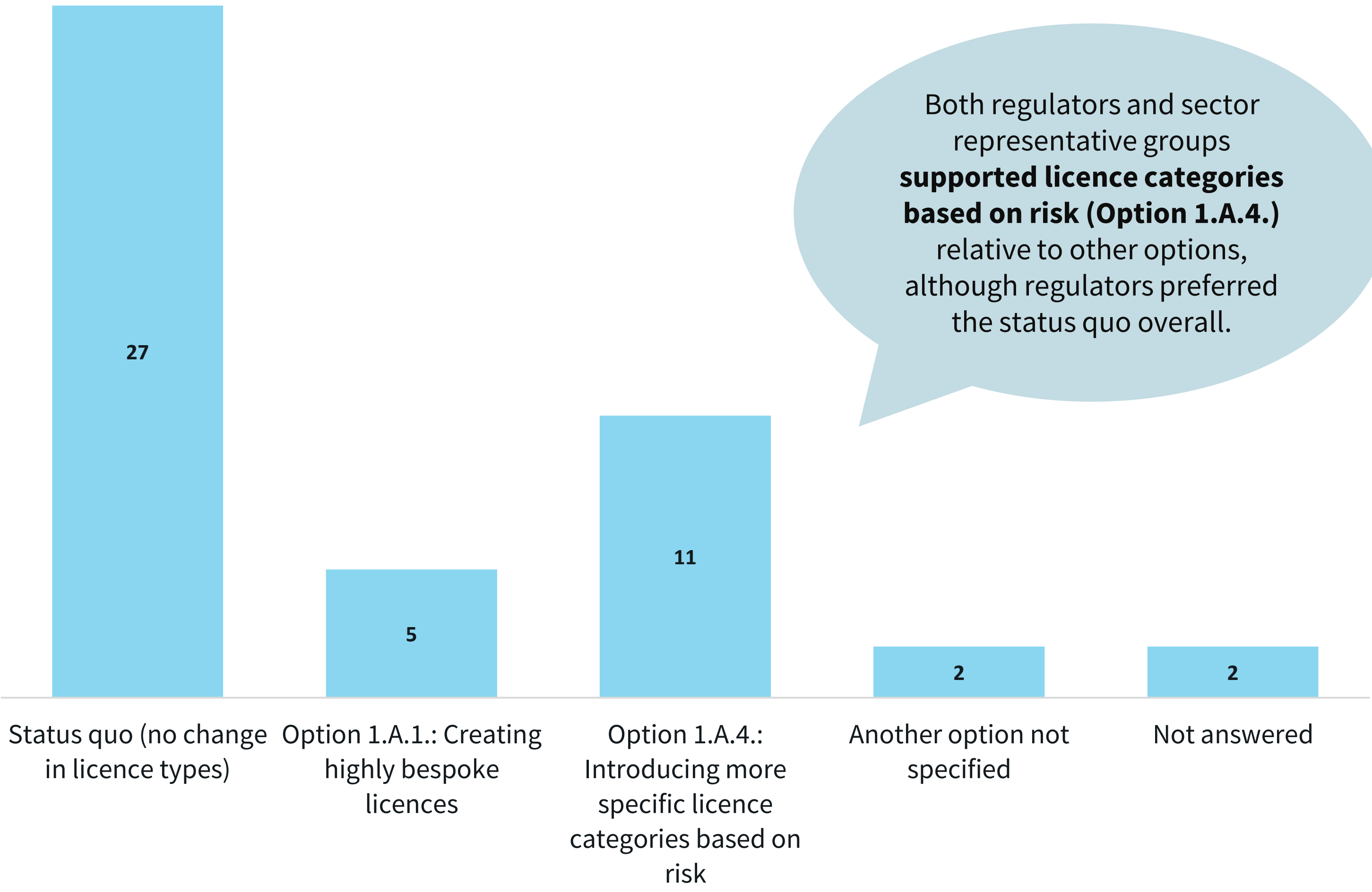
Options for change in the alcohol regulatory system

Alcohol

Options to make licensing requirements more proportionate to risk

Options for changing the flexibility of the alcohol licensing system

Regulator preferences for changing core licence types



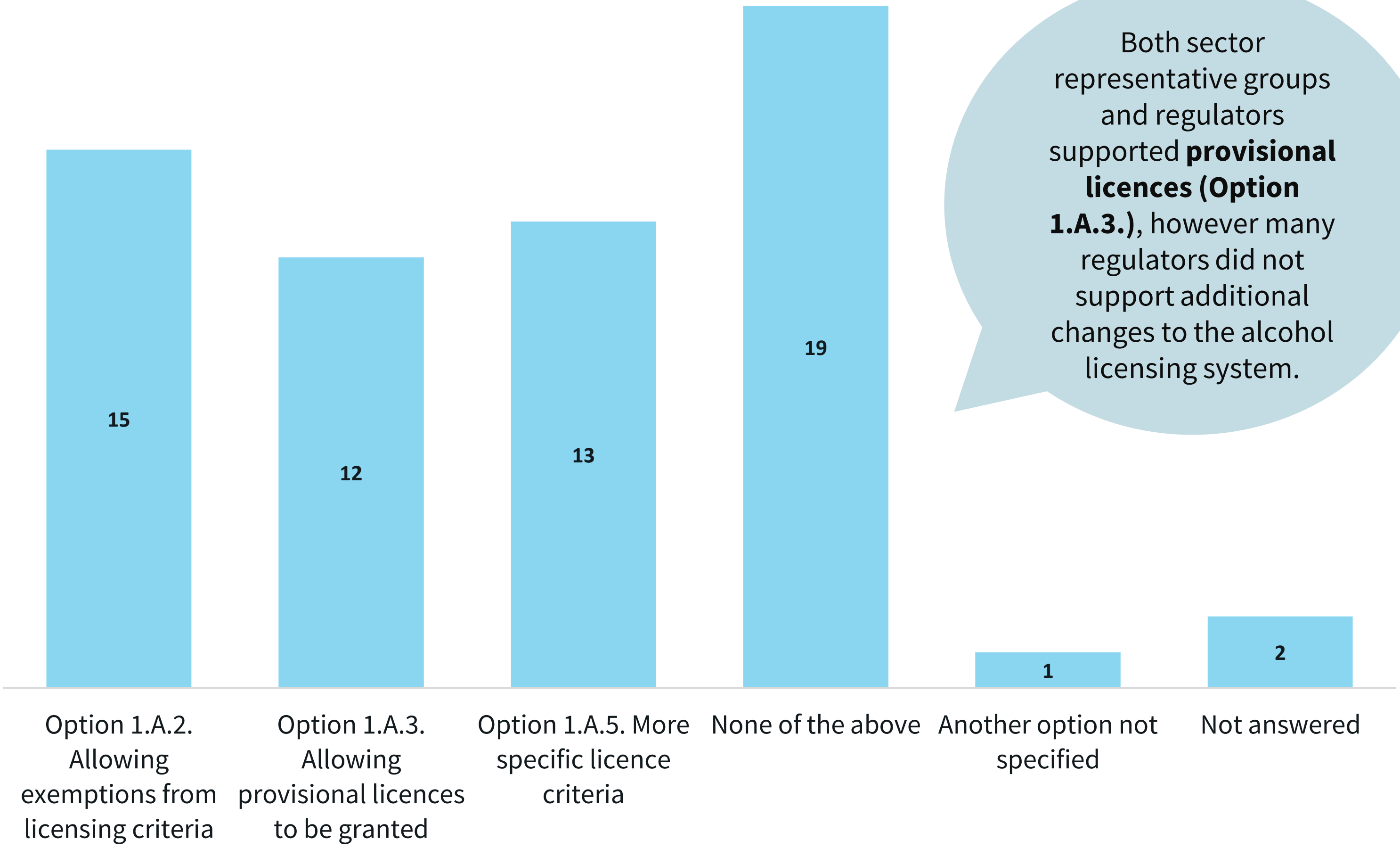
Both regulators and sector representative groups **supported licence categories based on risk (Option 1.A.4.)** relative to other options, although regulators preferred the status quo overall.

Sector representative groups' preferences for changing core licence types

- All sector representative groups generally preferred **licence categories based on risk (Option 1.A.4.).**
- Instead of changing the licensing types, Spirits NZ preferred a more simplified licensing system.
- Clubs NZ also believe club licences should be retained.

Other options for changing the flexibility of the alcohol licensing system

Regulator preferences for additional options for changing the flexibility of the alcohol licensing system



Both sector representative groups and regulators supported **provisional licences (Option 1.A.3.)**, however many regulators did not support additional changes to the alcohol licensing system.

Sector representative groups' preferences for additional options for changing the flexibility of the alcohol licensing system

- All sector representative groups generally supported **provisional licences (Option 1.A.3.).** Spirits NZ support the definition of usable licensing criteria that better define what a 'good' and 'bad' operator is.
- Brewers Association, Clubs NZ, Hotel Council Aotearoa and Hospitality NZ supported **exemptions from licensing criteria (Option 1.A.2.).**
- Only Hospitality NZ and the Star Group supported **more specific licensing criteria (Option 1.A.5.).**

Other themes from feedback on options to make requirements more proportionate to risk

views from regulators

views from sector representative groups

shared views

An appropriate licensing regime is likely to benefit ‘good’ or ‘well-behaved’ operators.

Regulators mainly prefer the status quo because either they believe the current system works well, or they are concerned about the cost or confusion that may prove a barrier for setting up a new system.

The current system does not adequately take into account the actual risk a business or activity presents, and it would be able to if the system could be tailored to specific circumstances.

The current licence categories do not fit how their businesses actually operate – the status quo does not effectively consider outliers.

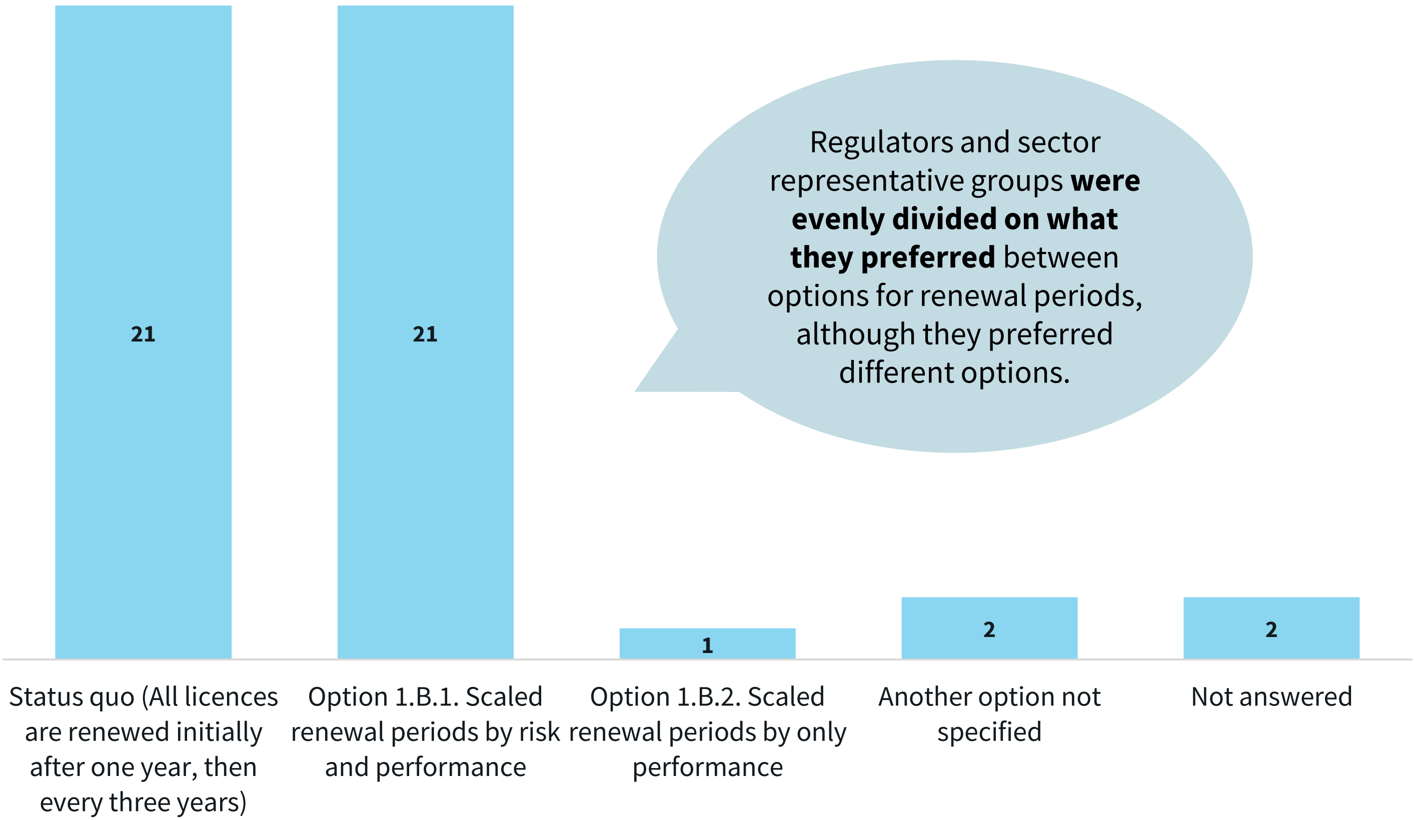
It does not make sense that holders of an on-licence cannot sell off-licence without holding that licence type.

Alcohol

Options to make the licensing process more efficient

Options for renewal periods

Regulator preferences for scaling renewals



Regulators and sector representative groups **were evenly divided on what they preferred** between options for renewal periods, although they preferred different options.

Sector representative groups' preferences for scaling renewals

- Sector representative groups were split on two options.
- Clubs NZ, Restaurant Association, and the Star Group supported **risk and performance-based renewal periods (Option 1.B.1.).**
- Brewers Association, Hospitality Council Aotearoa, and Hospitality NZ supported **only performance-based renewal periods (Option 1.B.2.).**

Other themes from feedback on options for renewal periods

- views from regulators
- views from sector representative groups
- shared views

Some regulators wanted longer renewal periods, but with better monitoring and enforcement.

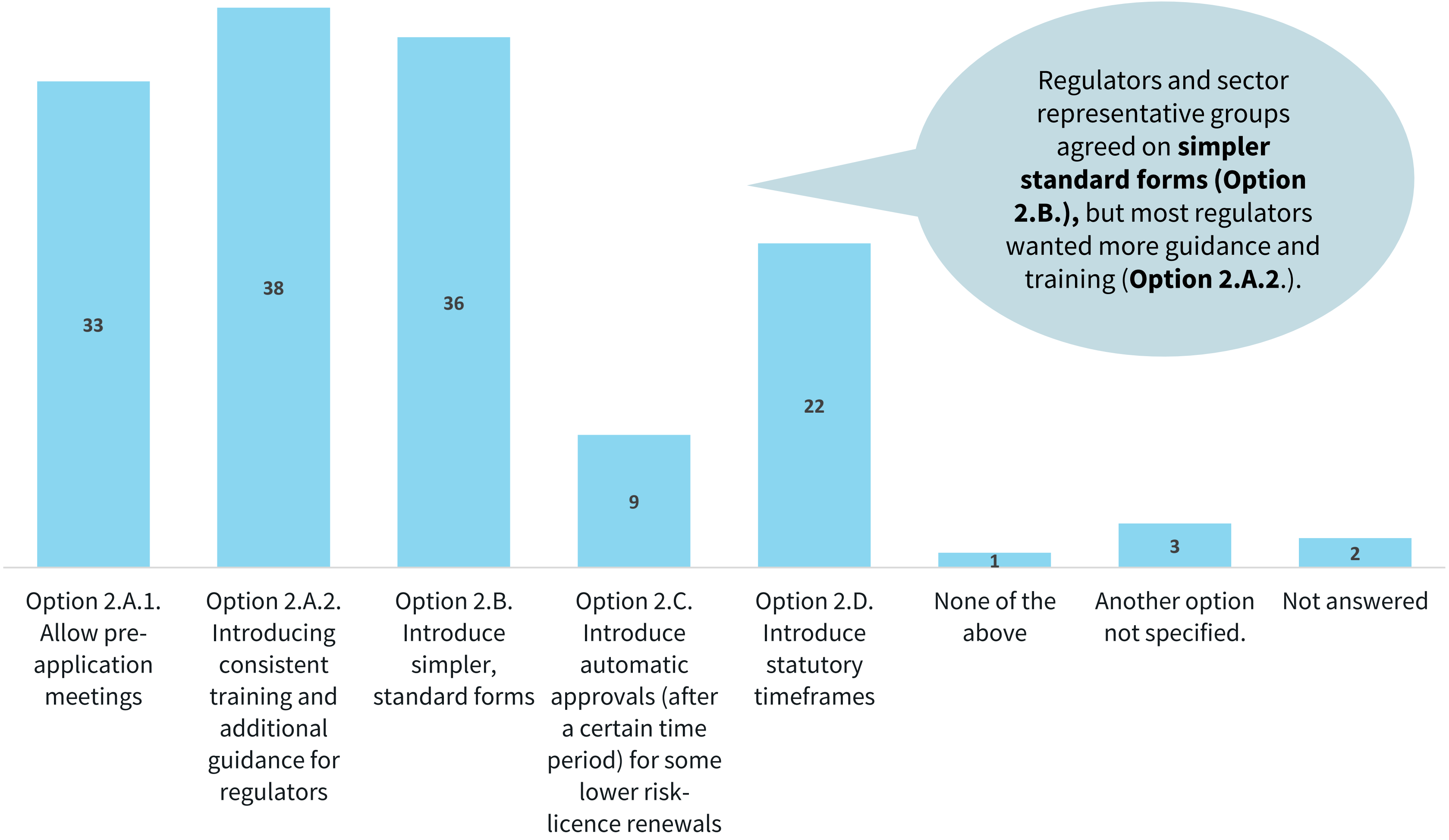
Submitters agree that a scaled approach is beneficial for the framework which supports good actors and continues oversight on ones that need improvement.

The renewal process is valuable and suggests going too long between inspections can mean that negative changes are unseen for too long.

Sector representative groups support a system that reduces regulatory burden on good performers while maintaining oversight on poor performers.

Options for improving the efficiency of the licensing process

Regulator preferences for improving process efficiency



Sector representative groups' preferences for improving the efficiency of the alcohol licensing process

- All sector representative groups were supportive of all proposed options to improve efficiency.
- Hospitality NZ and Brewers Association emphasised **simpler standard forms (Option 2.B.) and statutory timeframes (Option 2.D)** are of the highest importance for the industry.
- Spirits NZ cautioned unclear 'risk' interpretations for **automatic approvals for lower risk-renewals (Option 2.C.)** could add a layer of complexity to the licensing process.

Other themes from feedback on options for improving the efficiency of the licensing process

views from regulators

views from sector representative groups

shared views

Regulators support having more training to help upskill and improve consistency with their inspectors and DLCs.

Sector representative groups agreed the application processes are broadly the same across the country.

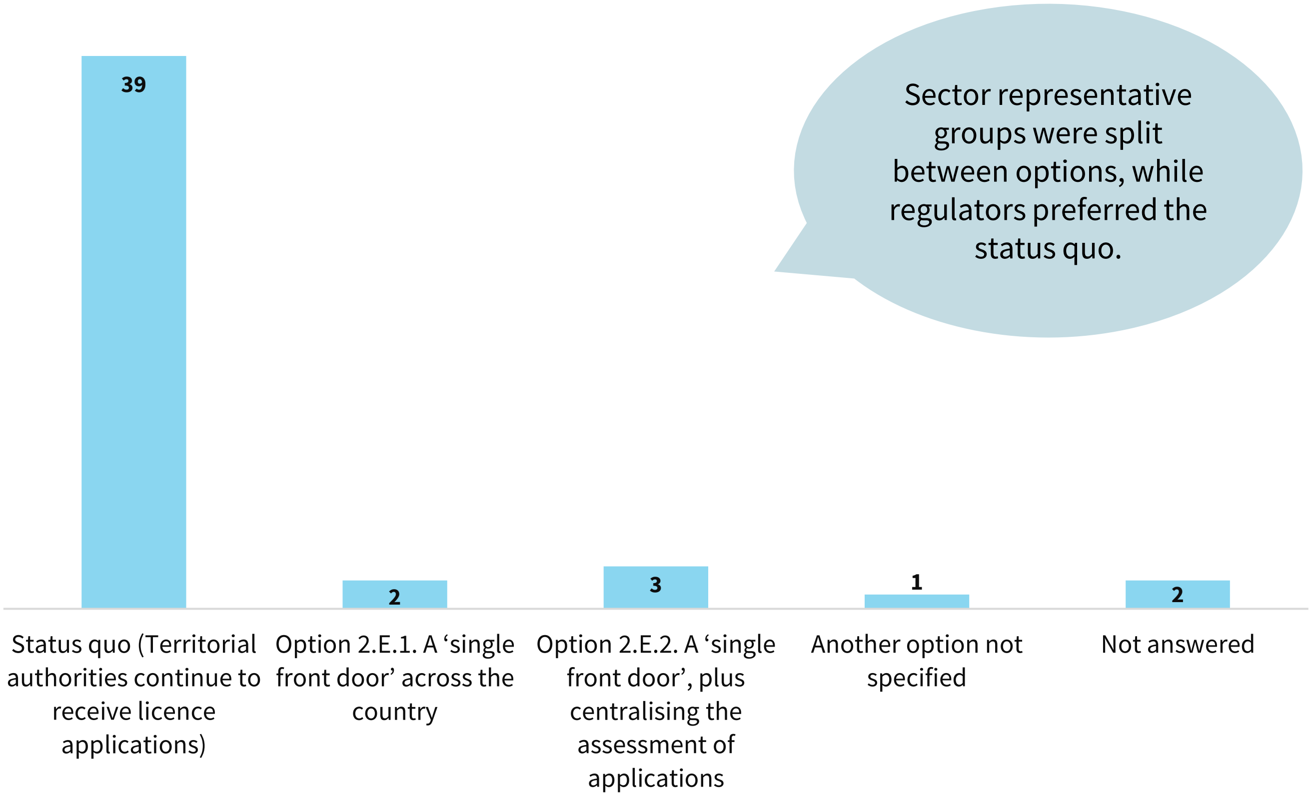
Regulators were cautious regarding automatic approvals as this could affect their ability to provide meaningful oversight.

Submitters advised generally pre-application meetings already happen and there is no need to formalise these meetings.

Regulators said the issue is not the form or processes itself, but that applicants submit incomplete information and this can stretch out the timeframes and expense in evaluating an application.

Options for centralising some administrative and assessment functions

Regulator preferences for centralising some functions



Sector representative groups’ preferences centralising some administrative and assessment functions

- Most sector representative groups wanted to see consistency across the assessment process.
- Brewers Association, Hospitality NZ and Hotel Council Aotearoa supported **a ‘single front door’ (Option 2.E.1.).**
- Spirits NZ and the Star Group supported **‘single front door’ + application assessment (Option 2.E.2.).**
- Clubs NZ want to maintain **territorial authorities receiving licence applications (status quo).** Clubs NZ see the value in a single front door, but are concerned that centralised assessments could reduce local understanding of the role clubs play in communities.

Other themes from feedback on options for centralising some administrative and assessment functions

views from regulators

views from sector representative groups

shared views

Consistency could be improved by centralising some functions.

Centralisation may increase time delays and bottlenecks.

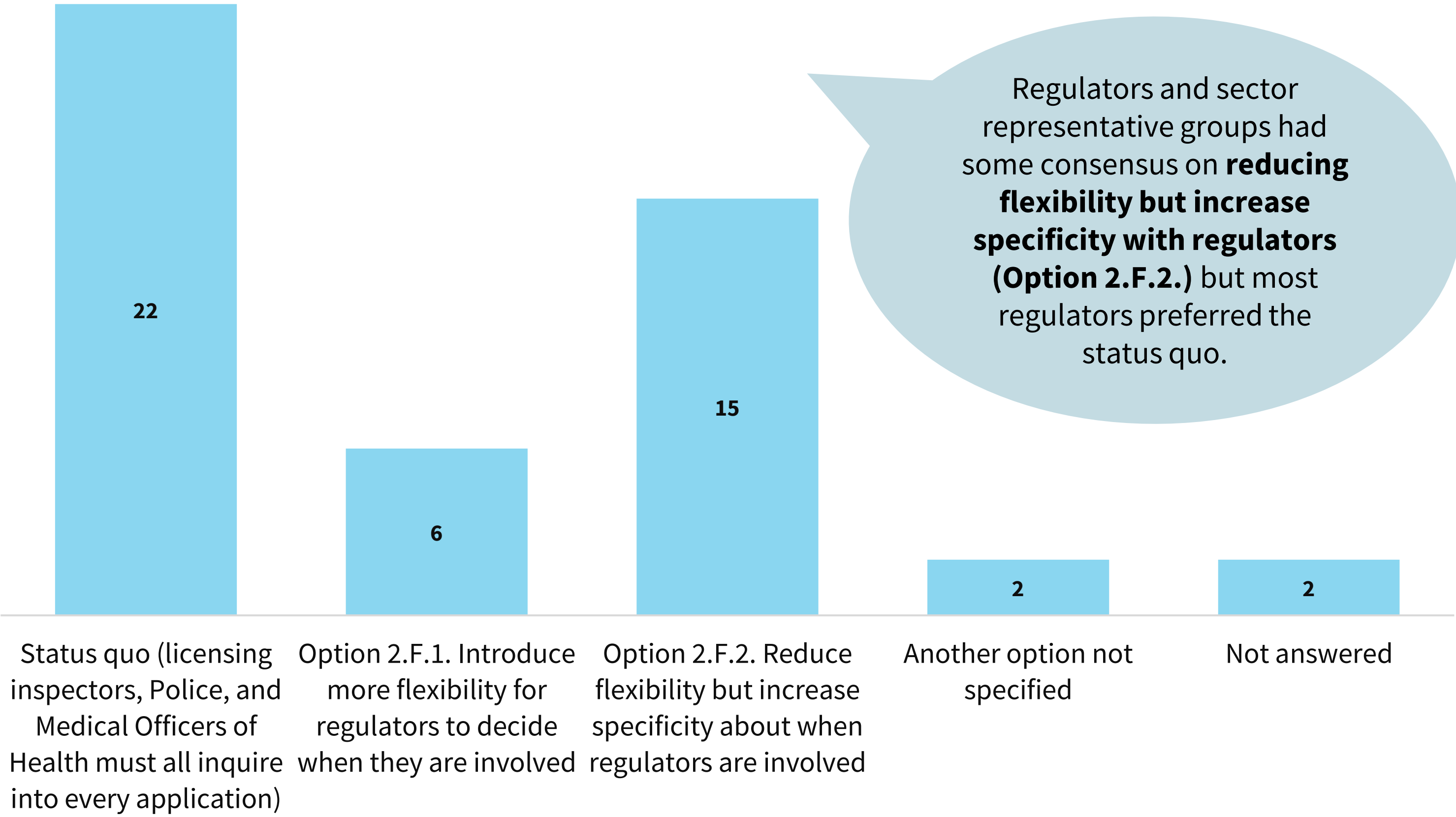
Knowledge of the local community would likely be lost at a central government level.

Sector representative groups want to reduce the administrative burden on territorial authorities to improve efficiency.

Standing up a central agency could involve significant cost, both in the start up of the agency and working out problems with implementing the new system.

Options for changing regulator involvement in the licensing process

Regulator preferences for changing regulator involvement in the licensing process



Regulators and sector representative groups had some consensus on **reducing flexibility but increase specificity with regulators (Option 2.F.2.)** but most regulators preferred the status quo.

Sector representative groups' preferences for changing regulator involvement in the licensing process

- Most sector representative groups supported **reduce flexibility but increase specificity with regulators (Option 2.F.2.).** Introducing clear criteria.
- Restaurant Association preferred retaining **involvement from licensing inspectors, Police, and Medical Officers of Health (status quo).**
- Spirits NZ did not have strong opinions on any of the options.

Other themes from feedback on options for changing regulator involvement in the licensing process

views from regulators

views from sector representative groups

shared views

Regulators generally preferred the status quo to prevent inconsistencies.

Submitters believe there should be some flexibility for involvement from regulators.

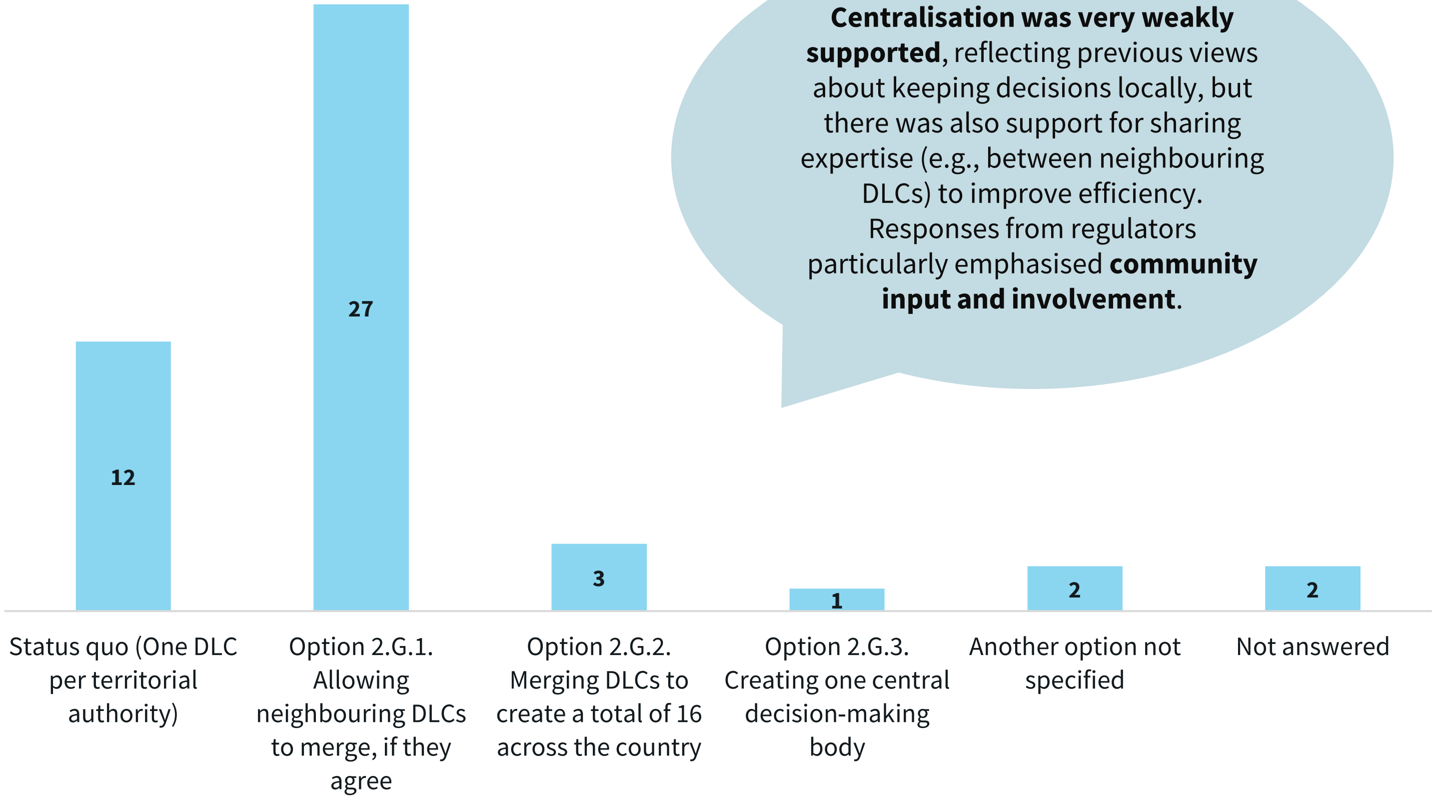
Most regulators value the role of the Police and Health, but there is more support for retaining Police involvement, with only enquiries from Health on an as-needed basis.

Mandatory involvement from Police and Health is unnecessary and should be used in a more targeted way.

Limiting involvement from Health and Police would likely increase harm.

Options for increasing the capacity of decision-making bodies

Regulator preferences for increasing the capacity of decision-making bodies



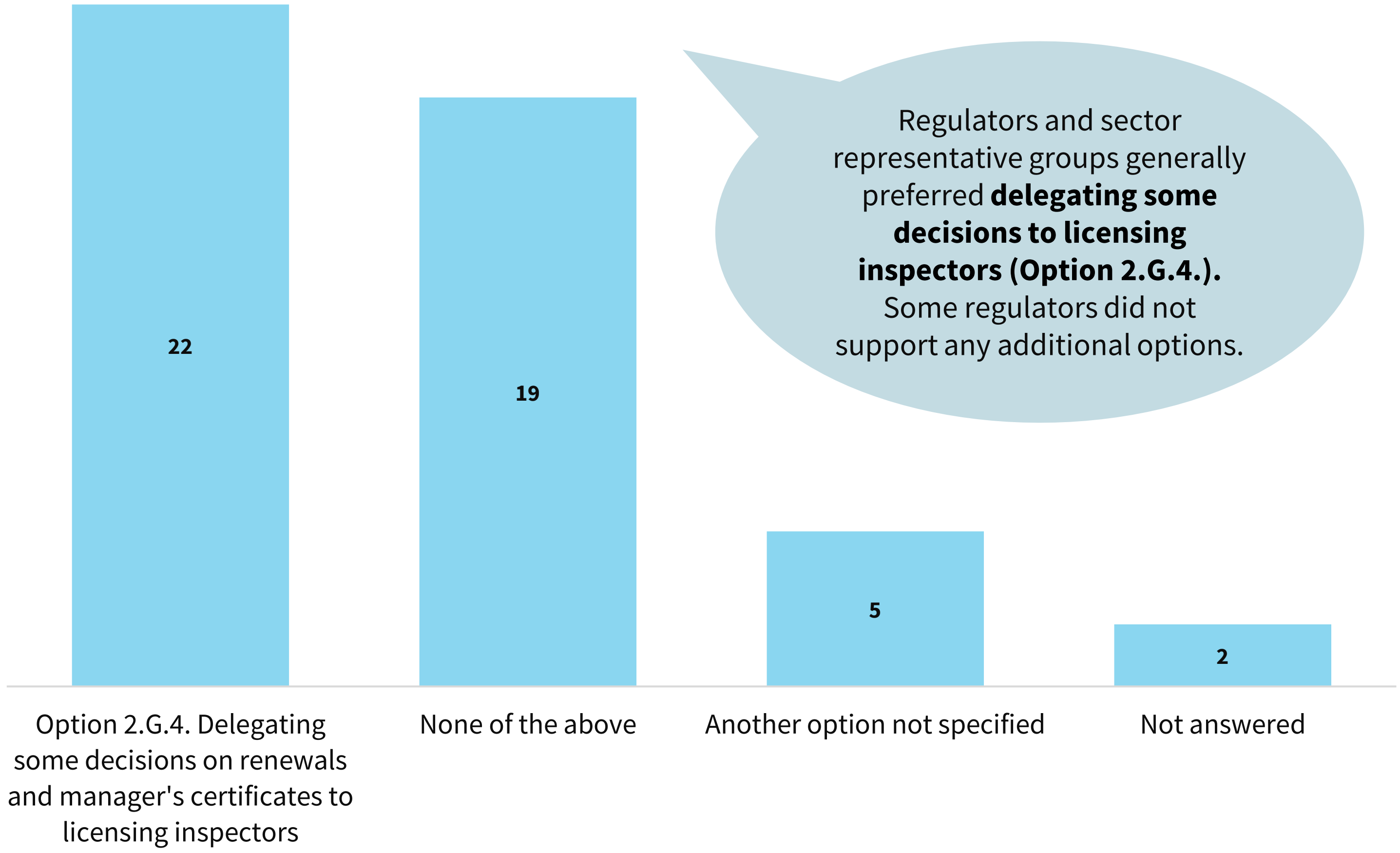
Centralisation was very weakly supported, reflecting previous views about keeping decisions locally, but there was also support for sharing expertise (e.g., between neighbouring DLCs) to improve efficiency. Responses from regulators particularly emphasised **community input and involvement**.

Sector representative groups' preferences for increasing the core capacity of decision-making bodies

- Sector representative groups were largely split on options for decision-making bodies.
- Brewers Association, Hotel Council Aotearoa and Hospitality NZ supported **Option 2.G.2. (merge DLCs to create 16).**
- Restaurant Association, Spirits NZ, and the Star Group supported **one central decision-making body (Option 2.G.3.).**
- Clubs NZ preferred **merge neighbouring DLCs, if they agree (Option 2.G.1.).**

Other options for increasing the capacity of decision-making bodies

Regulator preferences for additional options to increase the capacity of decision-making bodies



Regulators and sector representative groups generally preferred **delegating some decisions to licensing inspectors (Option 2.G.4.).** Some regulators did not support any additional options.

Sector representative groups' preferences for additional options to increase the capacity of decision-making bodies

- Most sector representative groups supported **delegating some decisions to licensing inspectors (Option 2.G.4.).**
- Spirits NZ did not support any of the additional options. Spirits NZ believed that centralising the licensing would be more efficient.

Other themes from feedback on options for increasing the capacity of decision-making bodies

- views from regulators
- views from sector representative groups
- shared views

Delegating some decisions to inspectors could reduce costs and improve processes by freeing up DLC time for more complex or important applications.

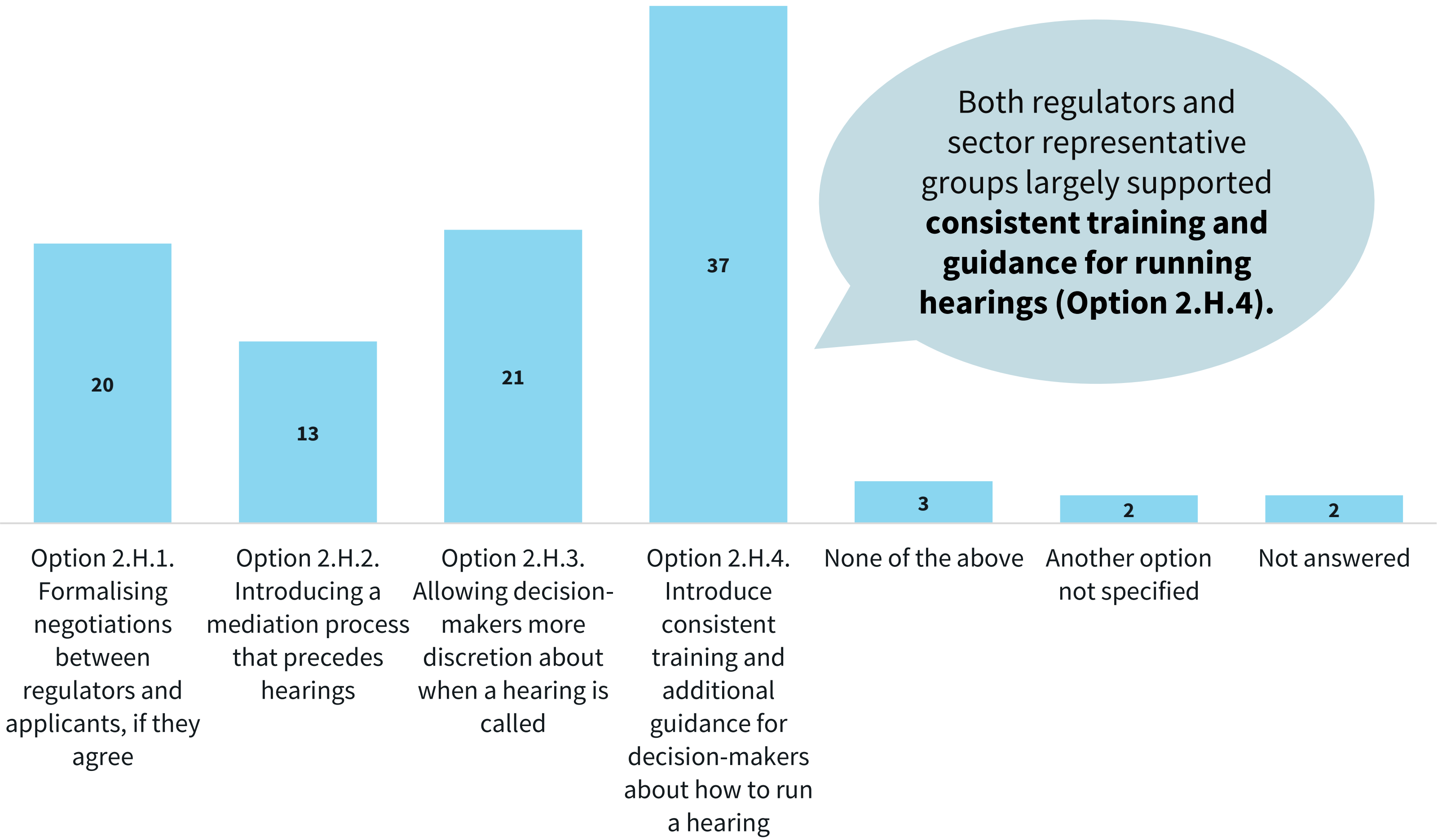
Some decisions should be delegated to inspectors, because inspectors are well-placed to assess low-risk matters like renewals, and they are a closer point of contact for applications.

Regulators have always had the opportunity to merge if they wanted but some have not done so, and so forcing a merger makes sense.

Regulators most strongly supported allowing DLCs to merge if they like, and a strong second to that was maintaining status quo. This supports their desire to improve efficiency where practical, but maintain autonomy when it better serves their community.

Options for introducing an alternative pathway to hearings and/or improving hearings

Regulator preferences for changing hearings



Both regulators and sector representative groups largely supported **consistent training and guidance for running hearings (Option 2.H.4).**

Sector representative groups' preferences for changing hearings

- All sector representative groups supported **a mediation process before hearings (Option 2.H.2.)** and most supported **consistent training and guidance for running hearings (Option 2.H.4)**.
- Hospitality NZ, Hotel Council Aotearoa, and Star Group, also supported **giving decision makers more discretion for calling hearings (Option 2.H.3).**
- Clubs NZ supported **formalising negotiations with regulators and applicants, if they agree (Option 2.H.1.).**
- Spirits NZ also suggested objectors should have to contribute to the cost of a hearing to disincentivise repeat objections.

Other themes from feedback on options for introducing an alternative pathway to hearings and/or improving hearings

views from regulators

views from sector representative groups

shared views

Regulators support increased training and guidance on running hearings, but express concern that the cost of this training should not be borne by local committee members and regulatory staff.

Sector representative groups support more consistent, transparent, and faster processes.

Hearings should be transparent and used only when necessary.

Many regulators said they already hold pre-hearing meetings.

Some regulators believe there should be more discretion when hearings are required, but there are concerns this may reduce community voice.

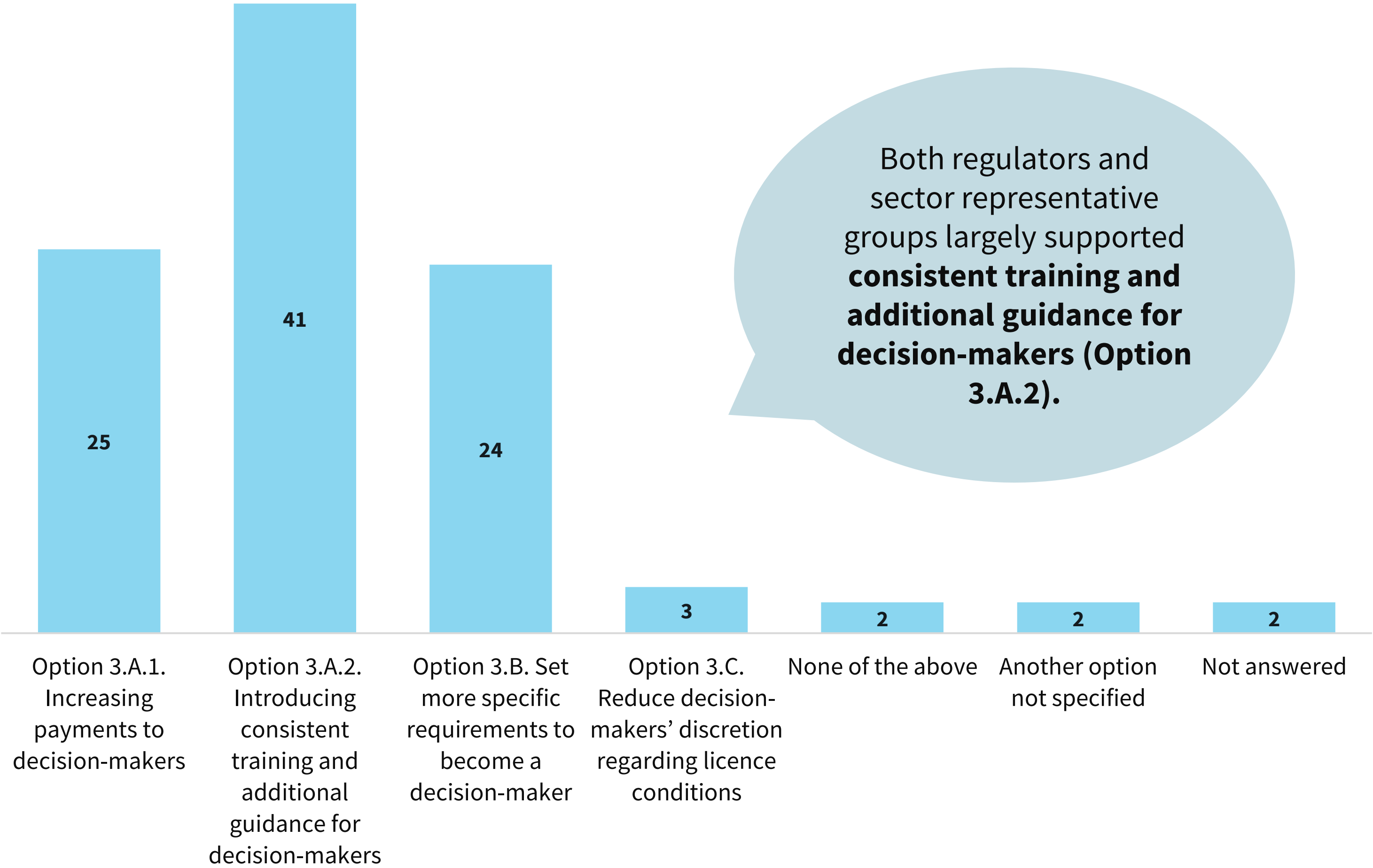
There should be alternative pathways to hearings (e.g., mediation).

Alcohol

Options to improve decision making about licenses

Options for improving decision making about licences

Regulator preferences for decision making about licences



Both regulators and sector representative groups largely supported **consistent training and additional guidance for decision-makers (Option 3.A.2).**

Sector representative groups' preferences for decision making about licences

- All sector representative groups supported **consistent training and additional guidance for decision makers (Option 3.A.2).** Most supported **more specific guidance to become a decision maker (Option 3.B)** and **reducing discretion on licence conditions (Option 3.C.).**
- Brewers Association, Hotel Council Aotearoa, and Hospitality NZ also supported **increasing payments for decision-makers (Option 3.A.1).**
- Spirits NZ also suggested there needs to be more data on performance of decision-makers across the country.

Other themes from feedback on options for improving decision-making about licenses

views from regulators

views from sector representative groups

shared views

Submitters agreed that consistent training and guidance would improve outcomes for all parties.

Regulators wanted to maintain the ability to make local decisions.

Sector representative groups stressed the importance of consistent decision-making for regulated parties.

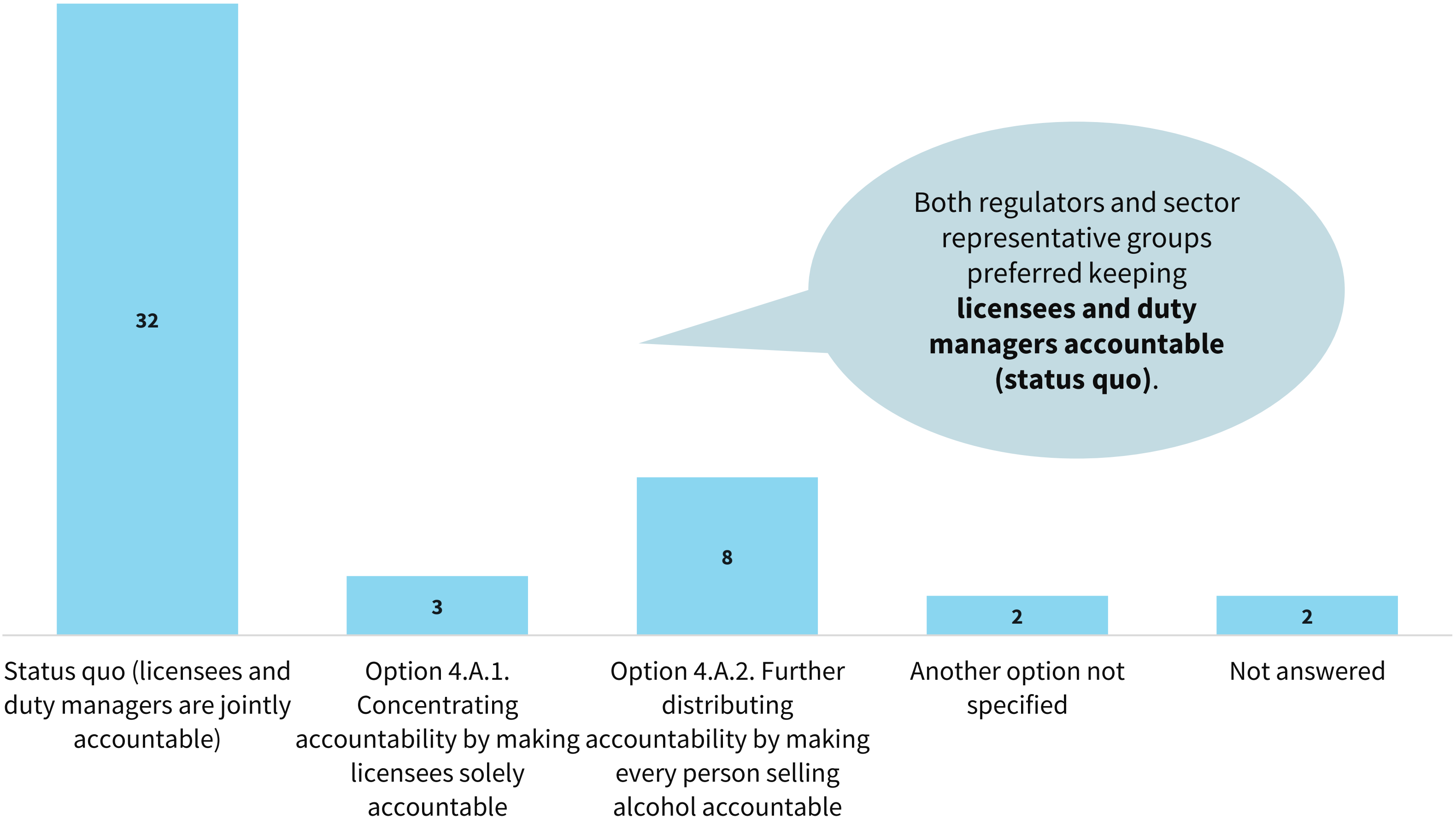
Increasing payments for decision makers would attract and retain quality decision makers.

Alcohol

Options to make the supervision of the sale and/or supply of alcohol more effective

Other options for making the supervision of the sale and / or supply of alcohol more effective

Regulator preferences for making supervision more effective



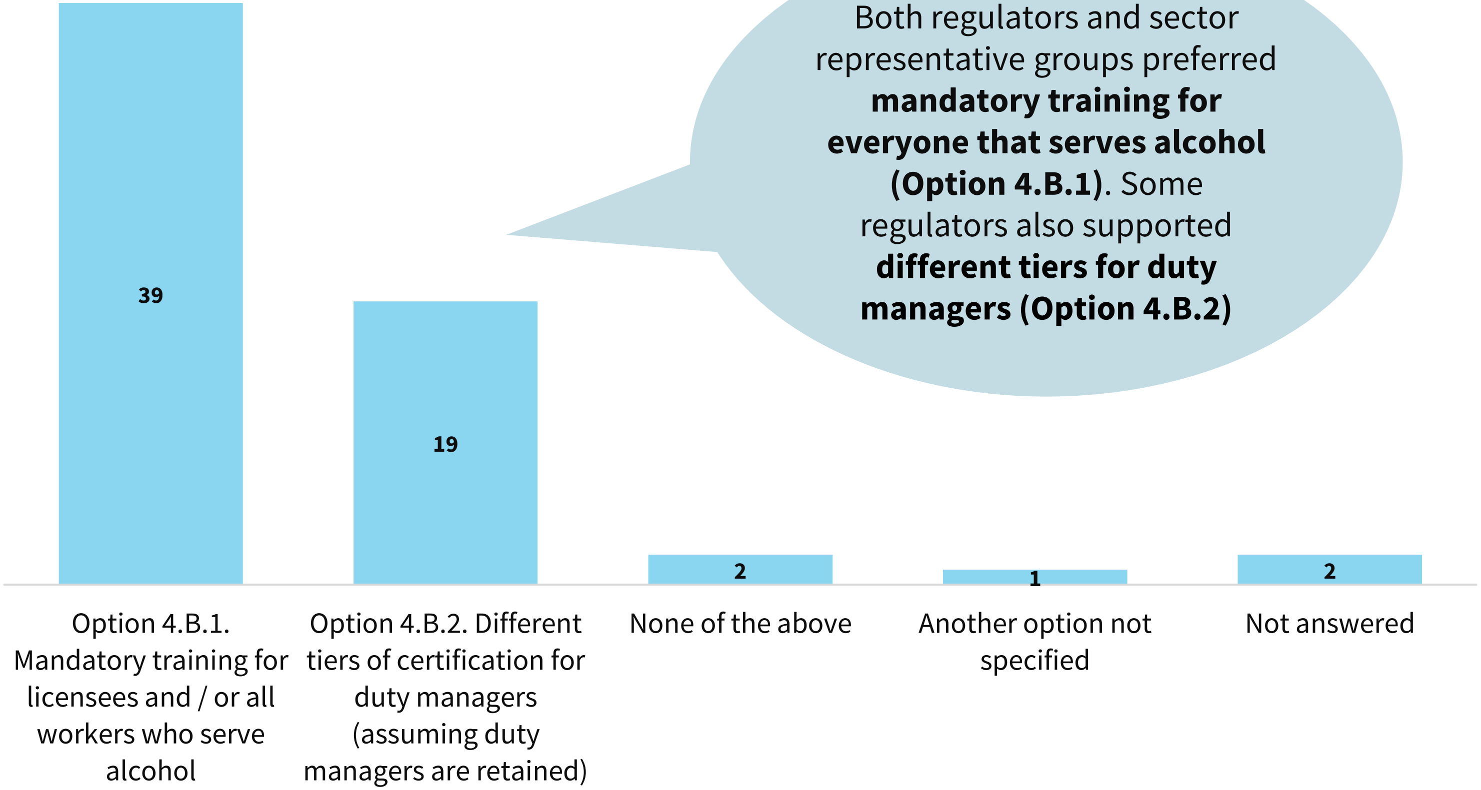
Sector representative groups' preferences for decision-making about licences

- Most sector representative groups supported keeping **licensees and duty managers accountable (status quo)**.
- Spirits NZ did not have a strong preference for any of the options.

Other options for making the supervision of the sale and / or supply of alcohol more effective

Regulator preferences for additional options to make supervision more effective

Both regulators and sector representative groups preferred **mandatory training for everyone that serves alcohol (Option 4.B.1)**. Some regulators also supported **different tiers for duty managers (Option 4.B.2)**



Sector representative groups' preferences for additional options to make supervision more effective

- Most sector representative groups supported **mandatory training for everyone that serves alcohol (Option 4.B.1).**
- Clubs NZ and Restaurant Association also supported **different tiers for duty managers (Option 4.B.2).**
- Hotel Council Aotearoa had concerns with Option 4.B.2 due to the sector's high reliance on overseas workers.
- Spirits NZ did not have a strong opinion for any of the options.
- Brewers Association highlighted the structural barriers of the duty manager framework in terms of the six month residency requirement and the inability to have a shared duty manager across venues.

Other themes from feedback on options for making the supervision of the sale and / or supply of alcohol more effective

views from regulators

views from sector representative groups

shared views

Regulators are broadly in support of keeping duty managers.

There is very little support for making licensees solely accountable, as many are too far removed or unavailable to the businesses.

Sector representative groups generally favoured the status quo. Distributing or concentrating liability is not considered viable due to labour constraints (e.g. volunteer or short-term staff), whereas training is a more effective way to improve outcomes.

Training requirements should be increased for all staff.

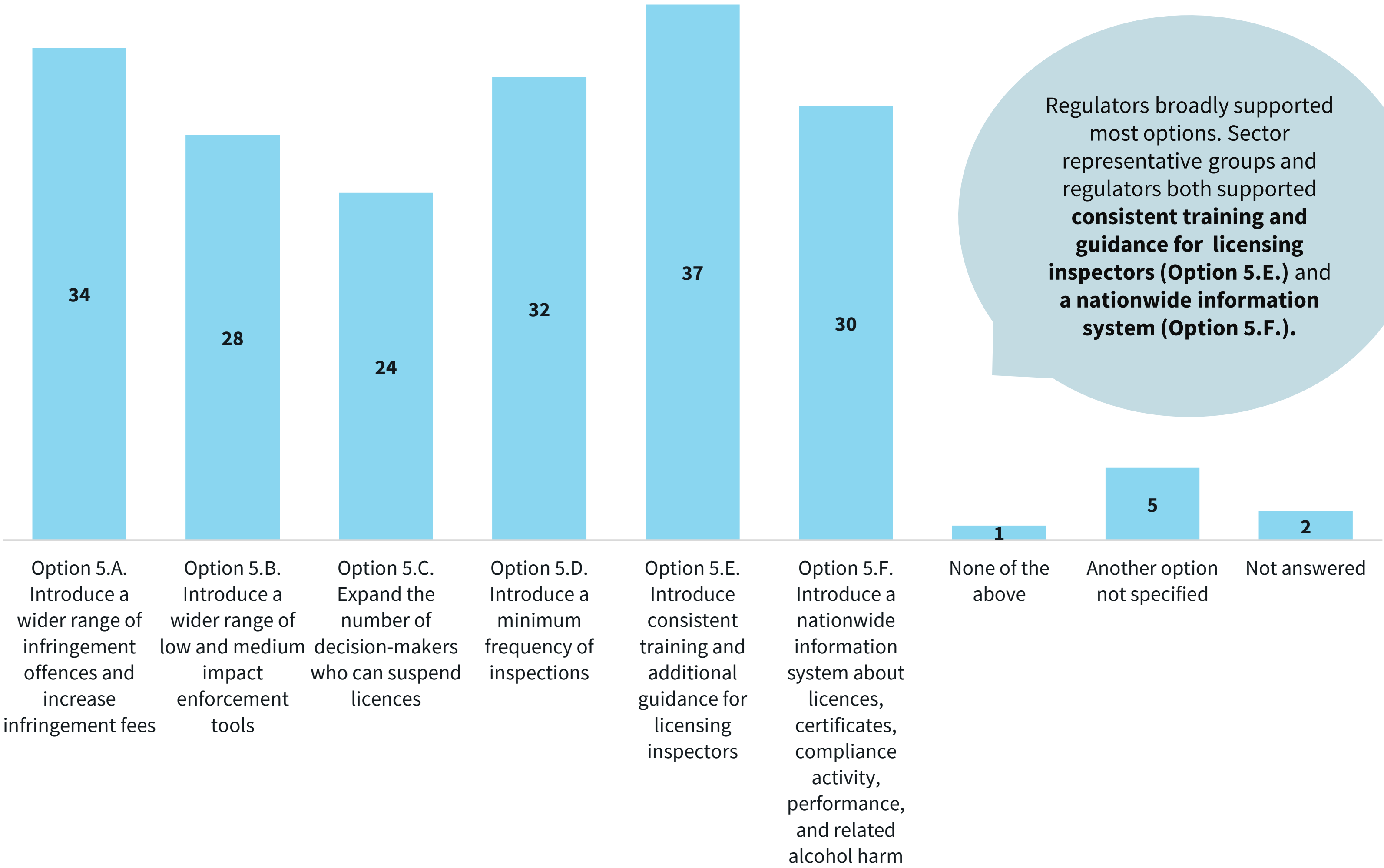
Some regulators believe that all staff are already accountable for selling alcohol

Alcohol

Options to make monitoring and enforcement less variable and more effective

Options for making monitoring and enforcement less variable and more effective

Regulator preferences for improving monitoring and enforcement



Regulators broadly supported most options. Sector representative groups and regulators both supported **consistent training and guidance for licensing inspectors (Option 5.E.)** and **a nationwide information system (Option 5.F.).**

Sector representative groups' preferences for improving monitoring and enforcement

- All sector representative groups supported **consistent training and guidance for licensing inspectors (Option 5.E.)** and **a nationwide information system (Option 5.F.).**
- Brewers Association, Clubs NZ, Hotel Council Aotearoa, Restaurant Association and Hospitality NZ also supported **a wider range of infringement offences and fees (Option 5.A.).**
- Brewers Association, Clubs NZ and Hospitality NZ also supported **a wider range of enforcement tools (Option 5.B.).**

Other themes from feedback on options for making monitoring and enforcement less variable and more effective

views from regulators

views from sector representative groups

shared views

Regulators suggested allowing territorial authorities to collect infringement money/appropriate enforcement standards.

Submitters broadly supported a nationwide information system for licensees.

Regulators support a nationwide information system, but want to ensure privacy concerns are appropriately managed.

Sector representative groups support a graduated enforcement framework to address non-compliance.

While regulators wanted more enforcement tools, this would also require infrastructure, time, and money to enforce.

Consistent training and guidance would help reduce variation in regulatory practice between districts and improve confidence in enforcement decisions.

THREE

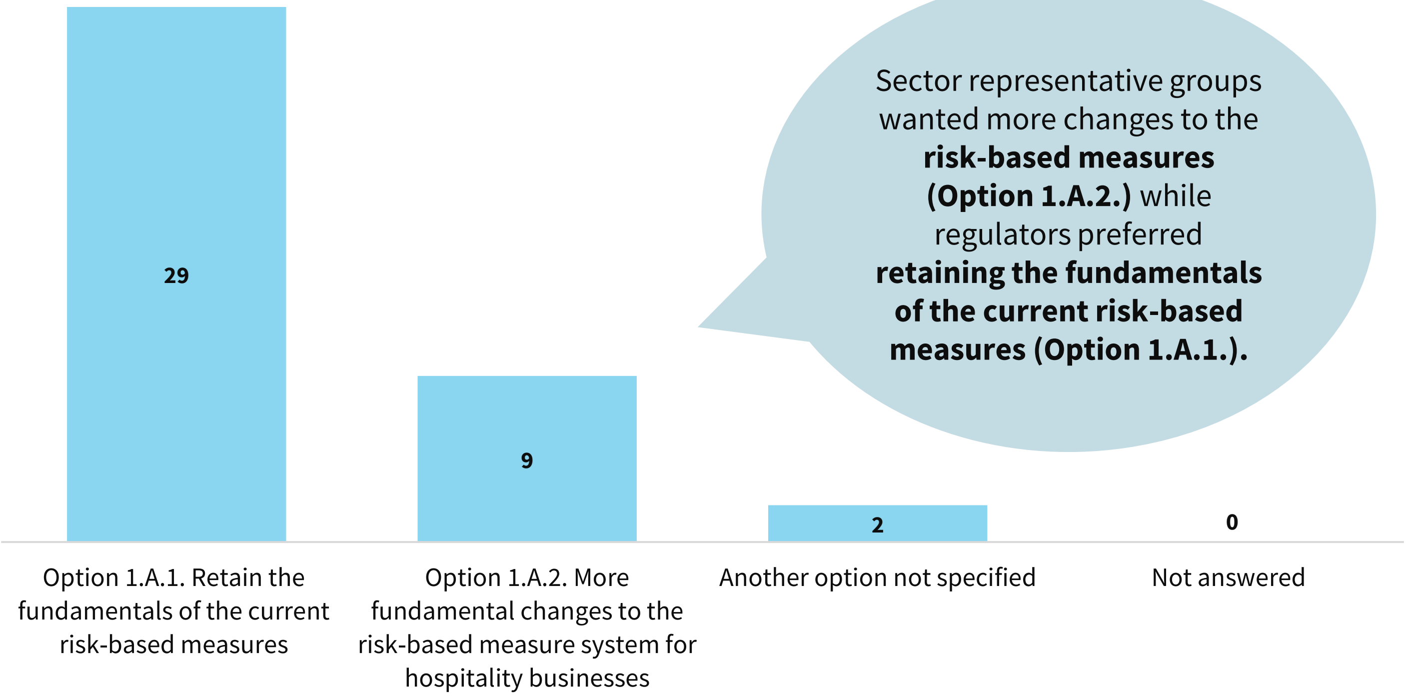
Food safety

Food

Options to make requirements more proportionate to risk and easier for regulated parties to understand

Options for making requirements more proportionate to risk and easier for regulated parties to understand

Regulator preferences for making core requirements proportionate to risk and easy to understand



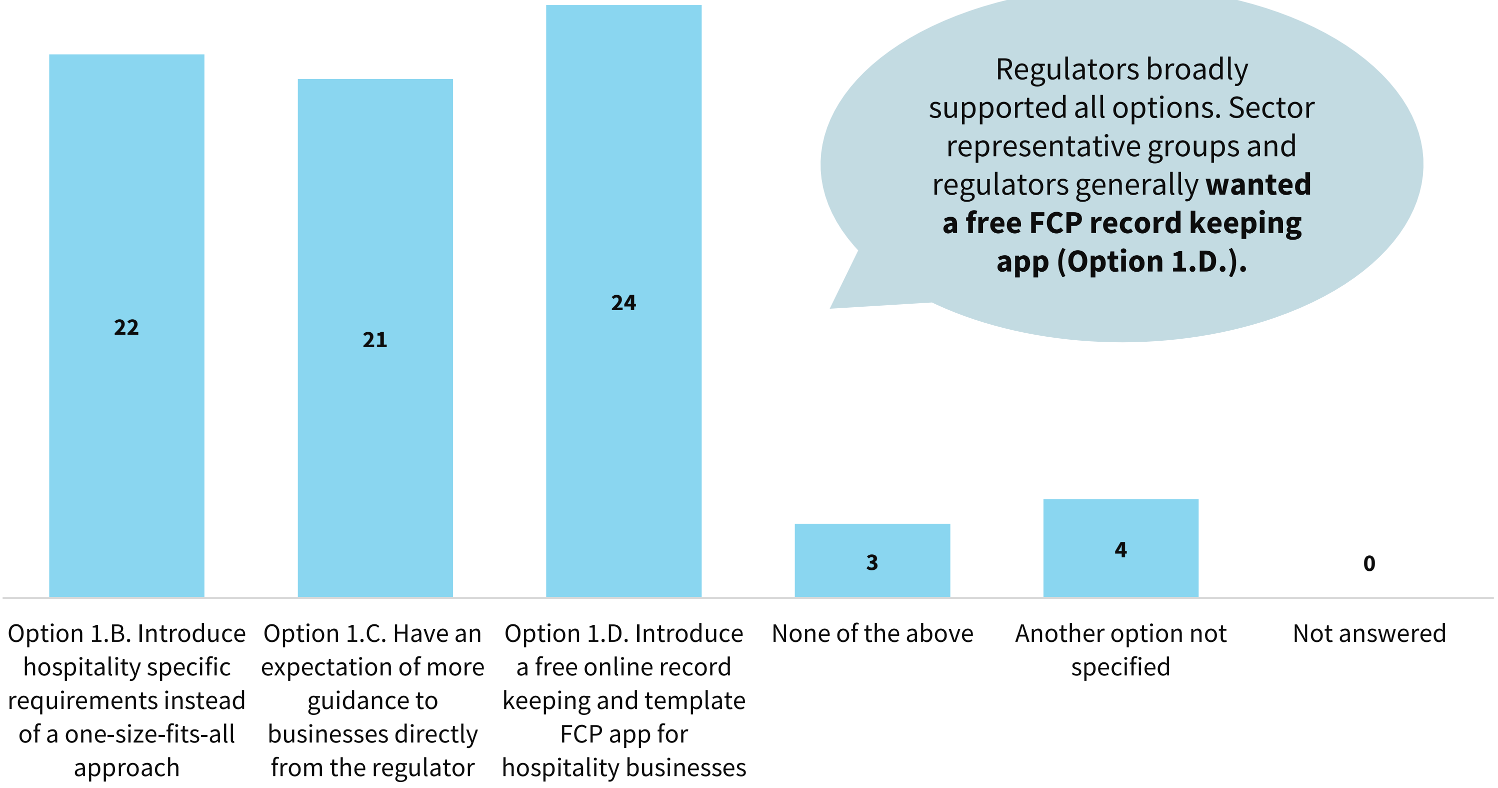
Sector representative groups wanted more changes to the **risk-based measures (Option 1.A.2.)** while regulators preferred **retaining the fundamentals of the current risk-based measures (Option 1.A.1.).**

Sector representative groups' preferences for making requirements proportionate to risk and easy to understand

- Most sector representative groups supported **more fundamental changes to the risk-based measures (Option 1.A.2.).** Restaurant Association saw merit in this option, but are cautious about how risk is defined and applied.
- Restaurant Association supported **retaining the fundamentals of the current risk-based measures (Option 1.A.1.).**

Additional options for making requirements more proportionate to risk and easier for regulated parties to understand

Regulator preferences for making additional requirements proportionate to risk and easy to understand



Regulators broadly supported all options. Sector representative groups and regulators generally **wanted a free FCP record keeping app (Option 1.D.).**

Sector representative groups' preferences for making additional requirements proportionate to risk and easy to understand

- Most sector representative groups supported **the introduction of hospitality specific requirements (Option 1.B.)** and **a free FCP record keeping app (Option 1.D.).**
- Clubs NZ, Hotel Council Aotearoa, and Hospitality NZ also supported **more guidance directly from the regulator (Option 1.C).**

Other themes from feedback on options for making requirements more proportionate to risk and easier for regulated parties to understand

views from regulators

views from sector representative groups

shared views

Most submitters said the current framework offers enough flexibility to be tailored to business type and risk.

Submitters supported offering more support and guidance upfront rather than when a problem occurs.

Some sector representative groups believe the current system does not reflect the diversity of the hospitality sector and believed an activity-based system would be more effective.

Businesses regularly change their practices and do not let regulators know when those changes happen.

There was broad support for a free online record keeping system, but there are concerns about the cost of maintaining the systems.

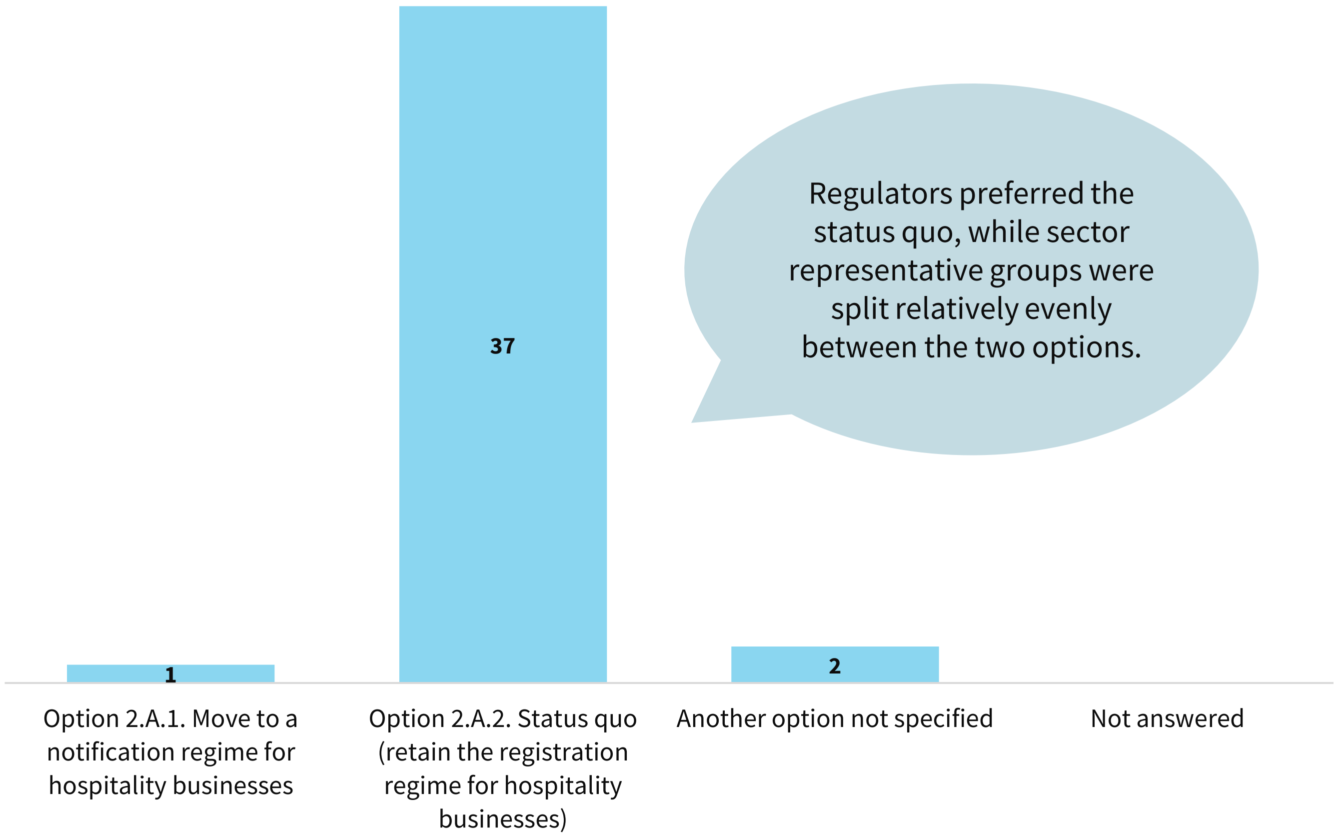
A proper redesign of risk-based measures would better reflect how different hospitality businesses operate and focus regulatory effort where it matters most.

Food

Options to improve the initial registration process and reduce the administration associated with registration

Options to improve the initial registration process and reduce the associated administration

Regulator preferences for improving the core registration process



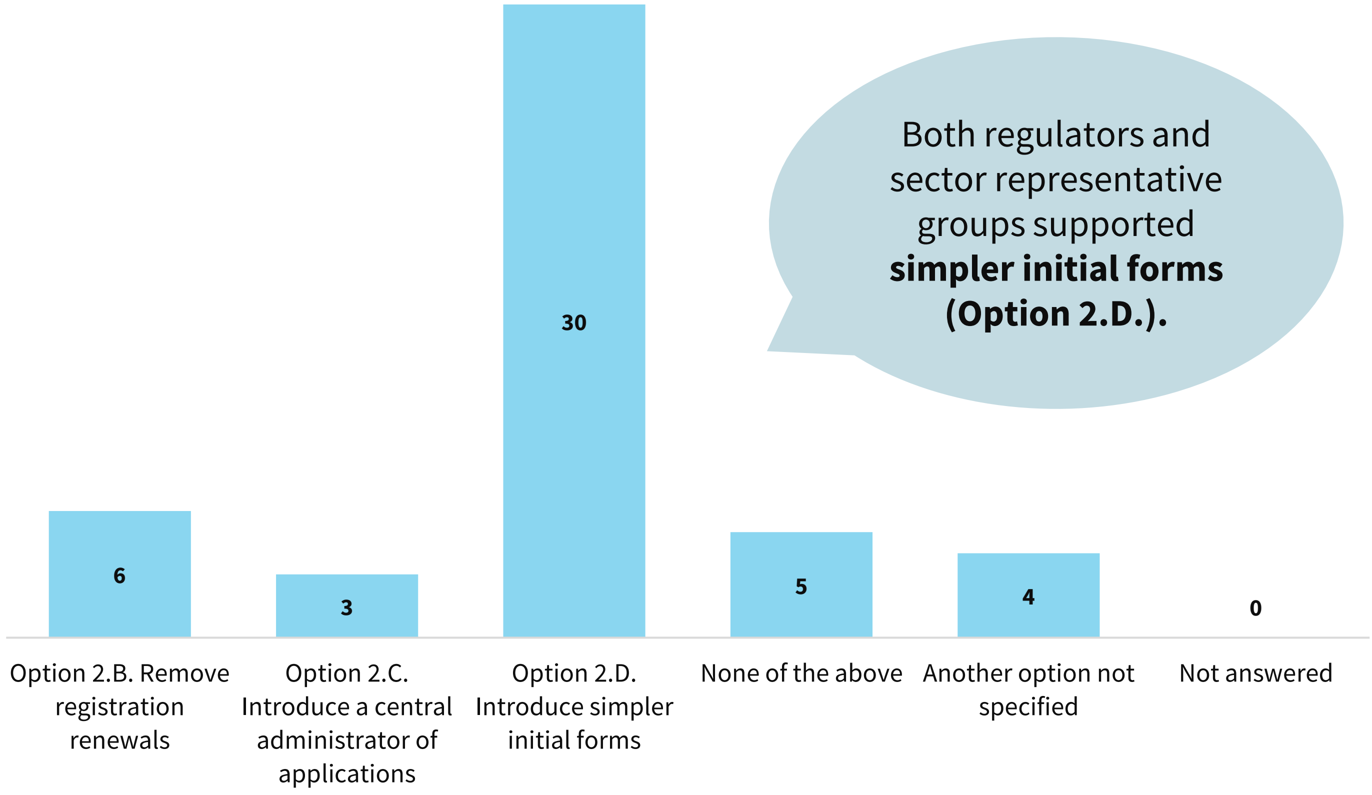
Regulators preferred the status quo, while sector representative groups were split relatively evenly between the two options.

Sector representative groups' preferences for improving the core registration process

- Clubs NZ, Hotel Council Aotearoa and the Star Group preferred **a notification regime (Option 2.A.1).**
- Restaurant Association and Hospitality NZ preferred **retaining registration regime for hospitality businesses (the status quo).** Hospitality NZ said renewals and inconsistency are the main issue, not registration.

Additional options for improving the initial registration process and reducing the associated administration

Regulator preferences for additional options to improve the registration process



Sector representative groups' preferences for additional options to improve the registration process

- All sector representative groups supported **removing registration renewals (Option 2.B.)** and **simpler initial forms (Option 2.D.).**
- Hospitality NZ and Hotel Council Aotearoa also supported **a central application administrator (Option 2.C)**. Restaurant Association also saw some merit in this option.

Other themes from feedback on options for improving the initial registration process and reducing the administration associated with registration

views from regulators

views from sector representative groups

shared views

The renewal frequency and inconsistency from regulators is more of a problem than registrations.

A standardised national template would improve consistency, and a simple preliminary form to help businesses identify their registration category or pathway.

Regulators strongly support the status quo.
The current process improves operators' understanding of obligations, particularly in higher-risk areas (e.g., allergen management), and renewal processes help mitigate risks from unnotified changes.

The current system is overly complex and has limited benefit to food safety outcomes.

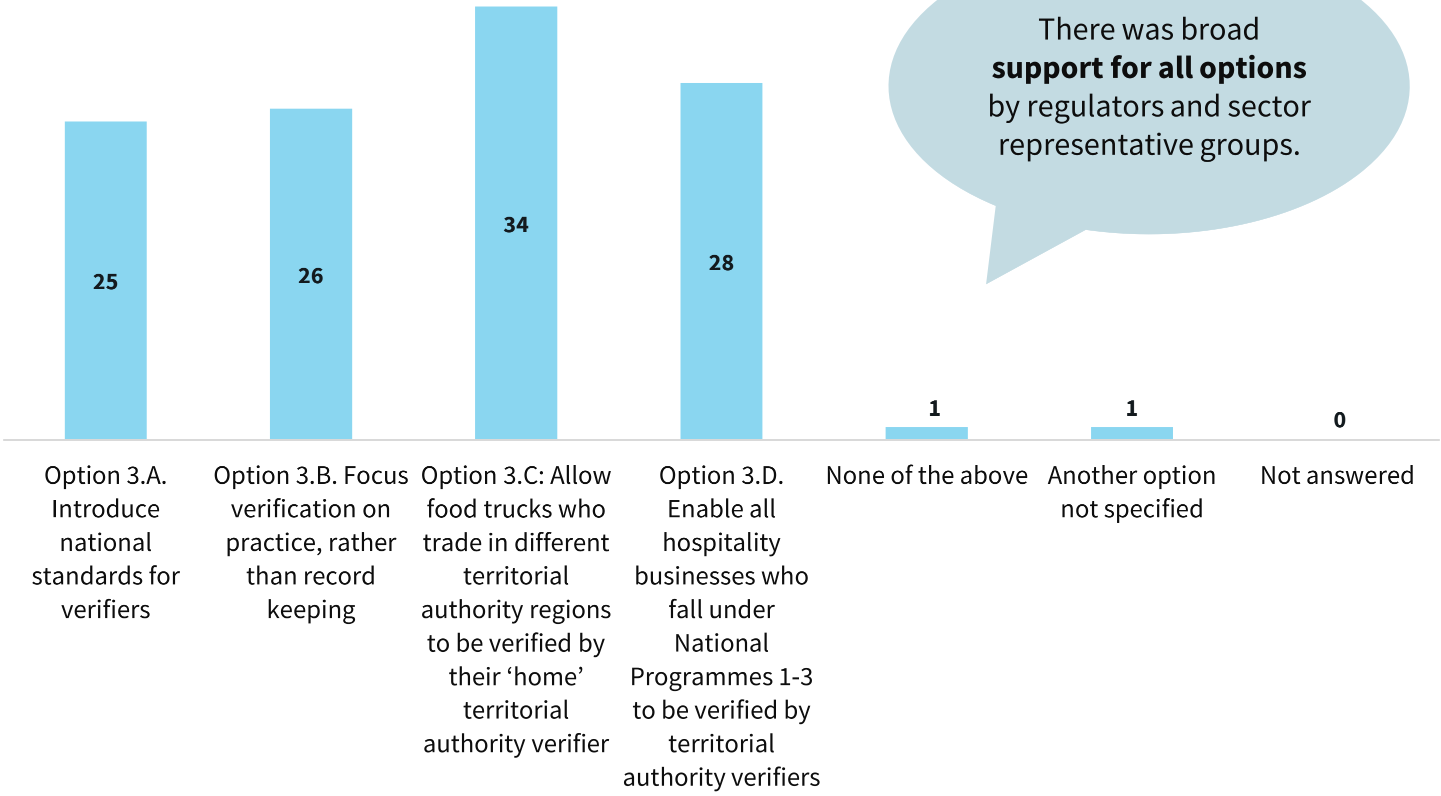
Simplifying the language would benefit the process. Forms are difficult to understand and/or highly technical, which is inappropriate for some businesses and especially difficult for those with English as a second language.

Food

Options to improve verification practices and the effectiveness of the verification process

Options for improving verification practice

Regulator preferences for additional options to improve the verification process



There was broad **support for all options** by regulators and sector representative groups.

Sector representative groups’ preferences for additional options to improve the verification process

- All sector representative groups supported **having national standards for verifiers (Option 3.A) and (Option 3.B.).**
- Clubs NZ and Hotel Council Aotearoa supported **territorial authority verifiers to verify National Programmes 1-3 (Option 3.D.).** Restaurant Association also supported this option, but noted most members are under Food Control Plans.
- Hospitality NZ, the Star Group and Restaurant Association also supported **food trucks to be verified by their ‘home’ verifier (Option 3.C).**

Other themes from feedback on options for improving verification practice

views from regulators

views from sector representative groups

shared views

Submitters believed that national standards would improve consistency across verifiers.

Territorial authorities should be able to verify lower risk businesses while reducing the unnecessary cost of third-party verifiers.

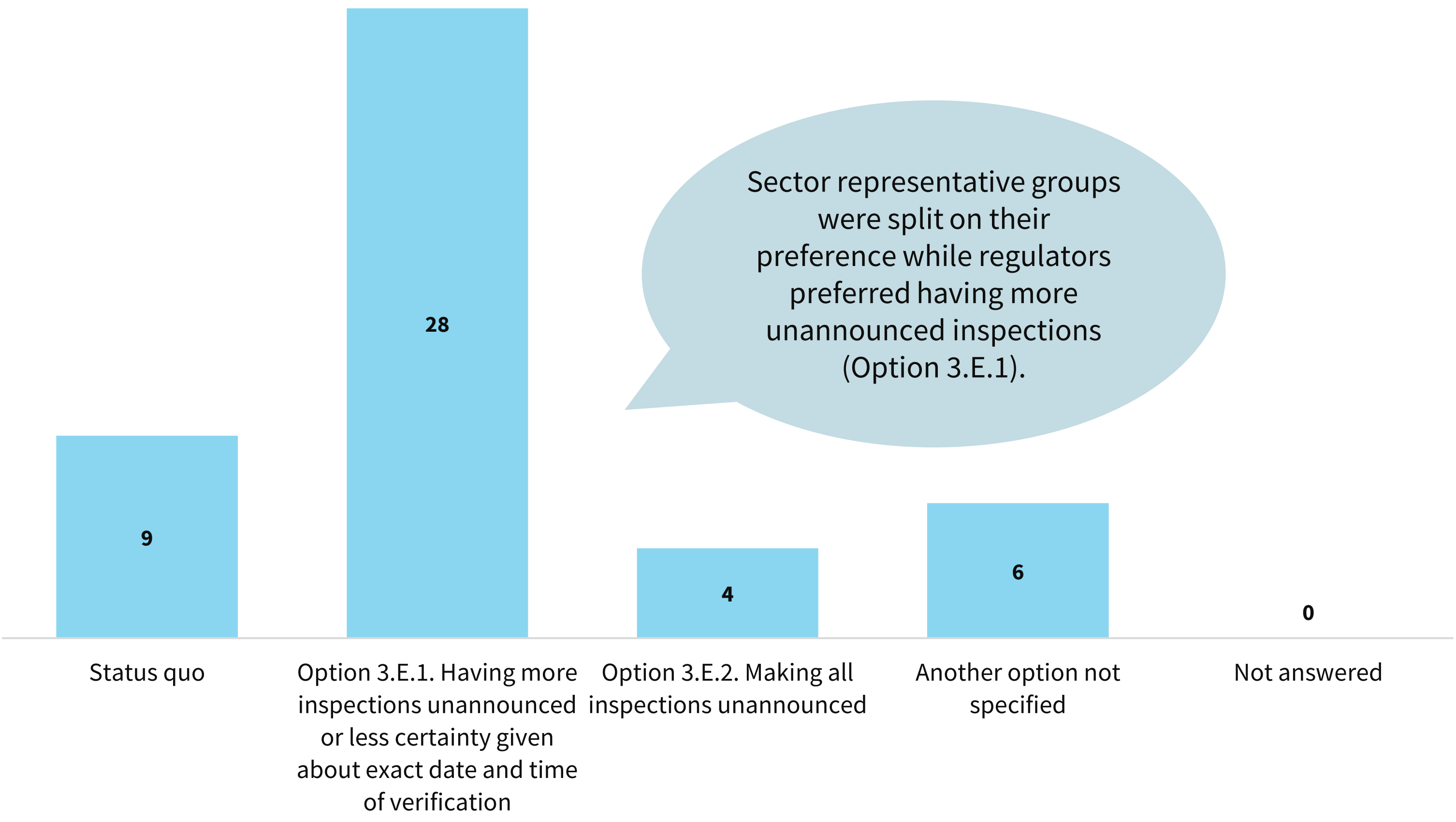
Allowing local authorities to verify NP 1-3 would simplify the food verification practices and improve relationships with the businesses.

Regulators supported the ability to verify NP 1-3, but acknowledged Quality Management System requirements would either need to be removed or granted to territorial authorities to be accredited.

Allowing food trucks to be verified by their ‘home’ verifier is a practical fix to a genuine problem for food truck operators.

Options for providing verifiers with more opportunity to observe kitchen behaviour and practice

Preferences for giving verifiers opportunities to observe kitchen operations



Sector representative groups' preferences for giving verifiers opportunities to observe kitchen operations

- Sector representative groups were generally split between **retaining announced inspections (status quo)** and **having more unannounced inspections (Option 3.E.1).**
- The Star Group preferred keeping inspections announced, but with less administration.

Other themes from feedback on options for providing verifiers with more opportunity to observe kitchen behaviour and practice

- views from regulators
- views from sector representative groups
- shared views

More unannounced inspections would encourage ongoing compliance and be more efficient for scheduling regulators in rural areas.

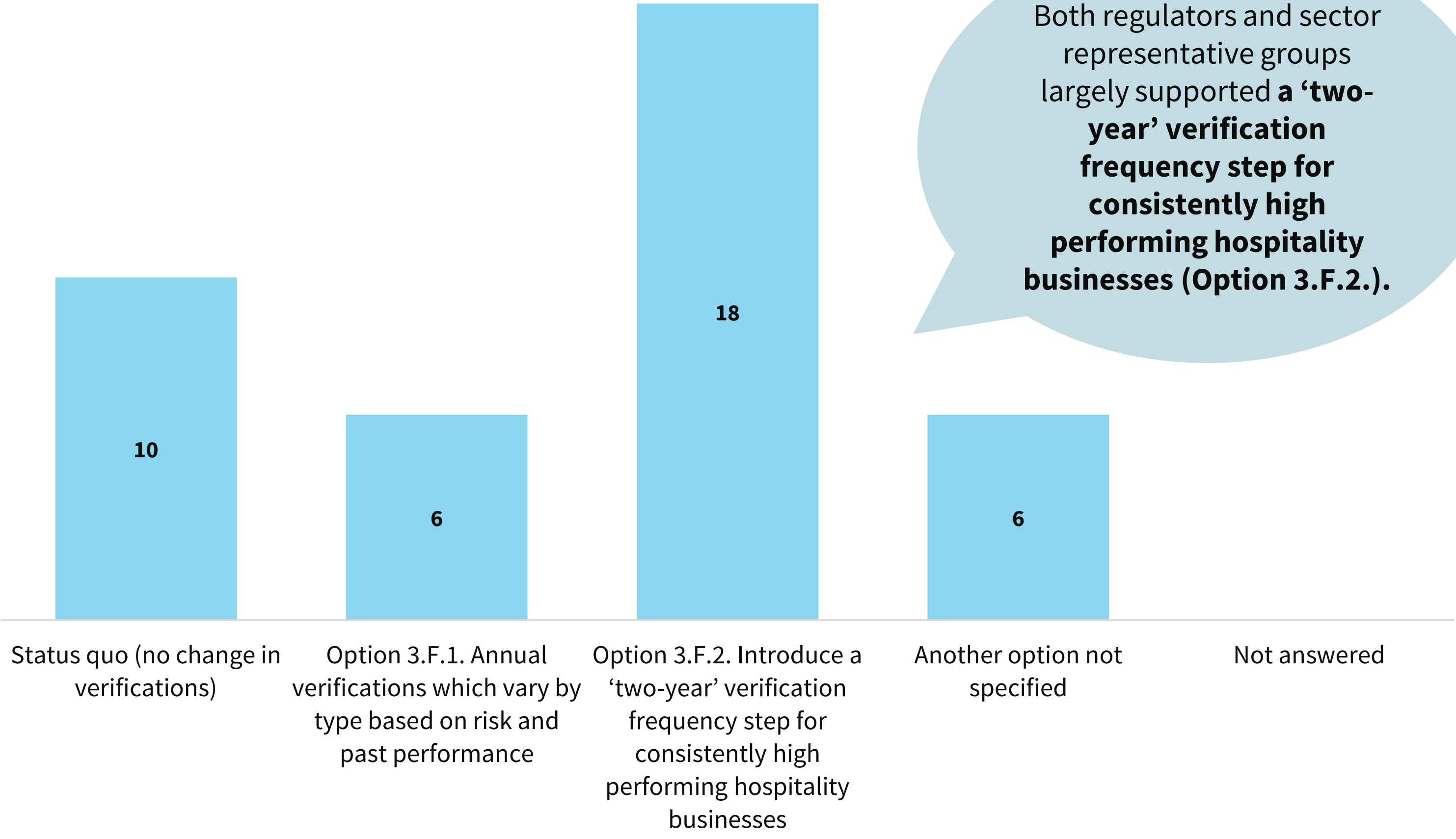
Fully unannounced inspections could be disruptive for businesses if the manager was unavailable or during peak times.

Unannounced inspections have their place for poor performing operators, but should not be routine for good performers.

No issues with the current framework only the cost of compliance.

Options for providing more certainty to well performing businesses

Regulator preferences for varying verifications based on performance



Both regulators and sector representative groups largely supported **a ‘two-year’ verification frequency step for consistently high performing hospitality businesses (Option 3.F.2.).**

Sector representative groups’ preferences for varying verifications based on performance

- All sector representative groups supported **a ‘two-year’ verification frequency step for consistently high performing hospitality businesses (Option 3.F.2.).** They agreed that a two year verification frequency is proportionate for consistently high performing businesses.

Other themes from feedback on options for providing more certainty to well performing businesses

views from regulators

views from sector representative groups

shared views

Maintaining verification frequency is essential to food safety.

High-performing, low risk operators should not be subject to frequent verification.

A two-year cycle is appropriate and a clear incentive. This would motivate businesses to maintain high standards and encourage good behaviour not only to pass inspections.

A two-year verification interval may be too long, as corrective actions are still identified even at 18-month intervals.

Food

Options to improve the effectiveness and efficiency of the enforcement of the food safety system

Options for making enforcement fairer, more efficient, and more effective

Regulator preferences for improving enforcement

Sector representative groups' for making enforcement fairer, more efficient, and more effective

- Clubs NZ, Hotel Council Aotearoa and Hospitality NZ supported **wider infringement offences (Option 4.B.).**
- Clubs NZ and Hotel Council Aotearoa also supported **local Food Safety Officers to take enforcement action in their jurisdiction (Option 4.A).**
- Restaurant Association supported proportionate, practical, and nationally consistent enforcement that focused on improving food safety outcomes.

Other themes from feedback on options for making enforcement fairer, more efficient, and more effective

views from regulators

views from sector representative groups

shared views

Businesses would benefit more from clearer guidance that addresses risks instead of an increase in regulatory enforcement tools.

More infringement notices would promote a more graduated enforcement model. This is the most efficient and lowest cost solution.

More infringement notices would provide incentives for businesses to comply, but one business raised concerns that actions need to be evidence-based, not subjective.

Faster enforcement with a broader range of tools would improve fairness and ensure poorly performing operators are identified.

Allowing Food Safety Officers to take faster enforcement action would help ensure fair and timely response to non-compliance.

Four

Fees & Levies

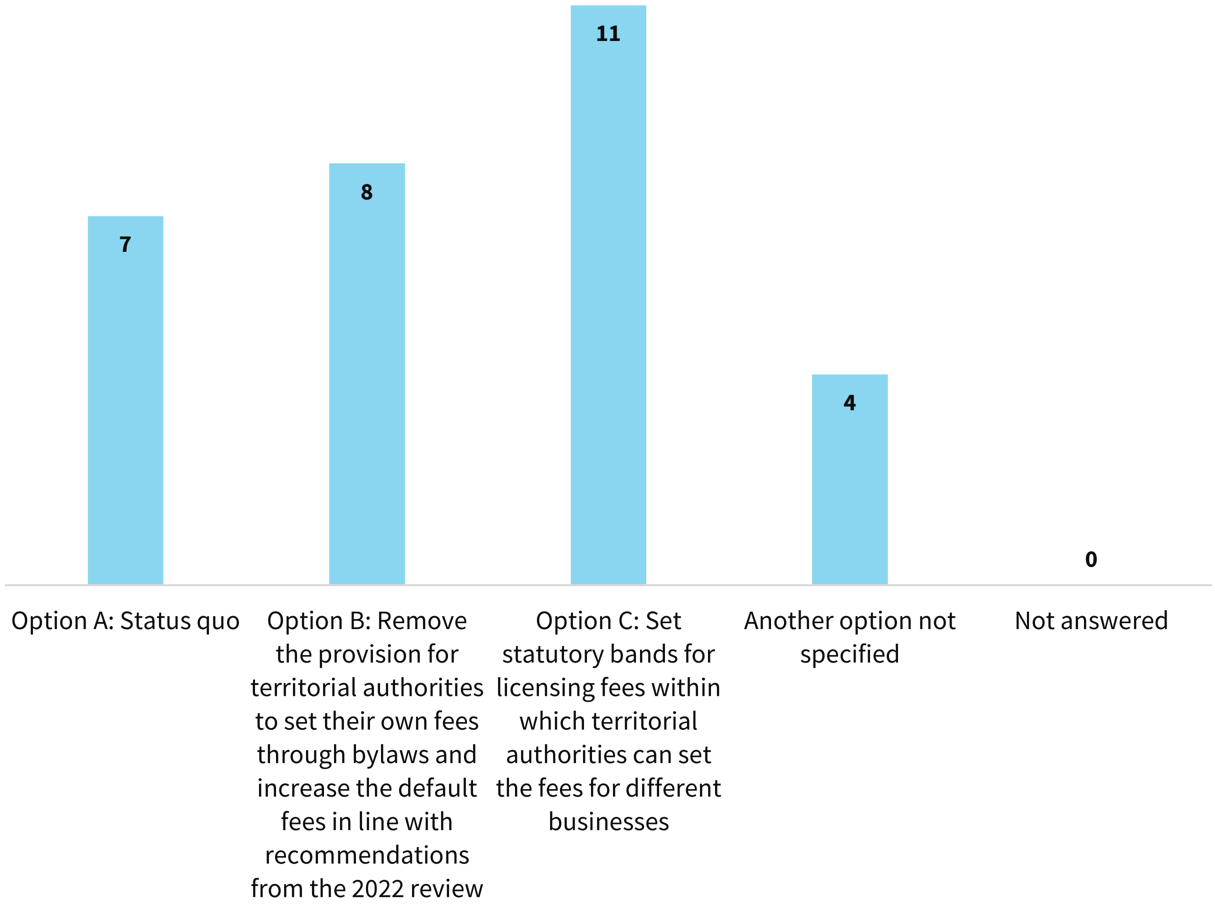
This section only includes responses from territorial authorities

Fees & levies

Options for changing the alcohol licensing fees framework

Options for changing the fees framework for alcohol licensing

Core preferences for changing the fees framework



Territorial authorities also supported some complementary options for changing alcohol licensing fees…

- 69% of territorial authorities supported requiring the default licensing fees to adjust annually with changes to the Consumer Price Index (Option D).
- 41% of territorial authorities supported setting a statutory timeframe for the cost recovery reporting that is required from them.
- There was limited support for replacing annual fees with inspection fees and reducing renewal fees (Options E and F), which were supported by 10% and 3% of territorial authorities respectively.

Regulators also told us that...

The burden of a shortfall in alcohol licensing fees often falls on rate payers.

Fee setting is necessary to recover costs for regulatory activity.

The fees framework outlined in the Sale and Supply of Alcohol (Fees) Regulations 2013 are outdated and territorial authorities are not cost recovering for regulatory activities.

They want the flexibility to set fees and cost recover more effectively. Many submitters believed that bands need to be wide and indexed to be supported.

Requiring statutory timeframes could improve accountability and transparency.

Reducing fees would undermine cost recovery.

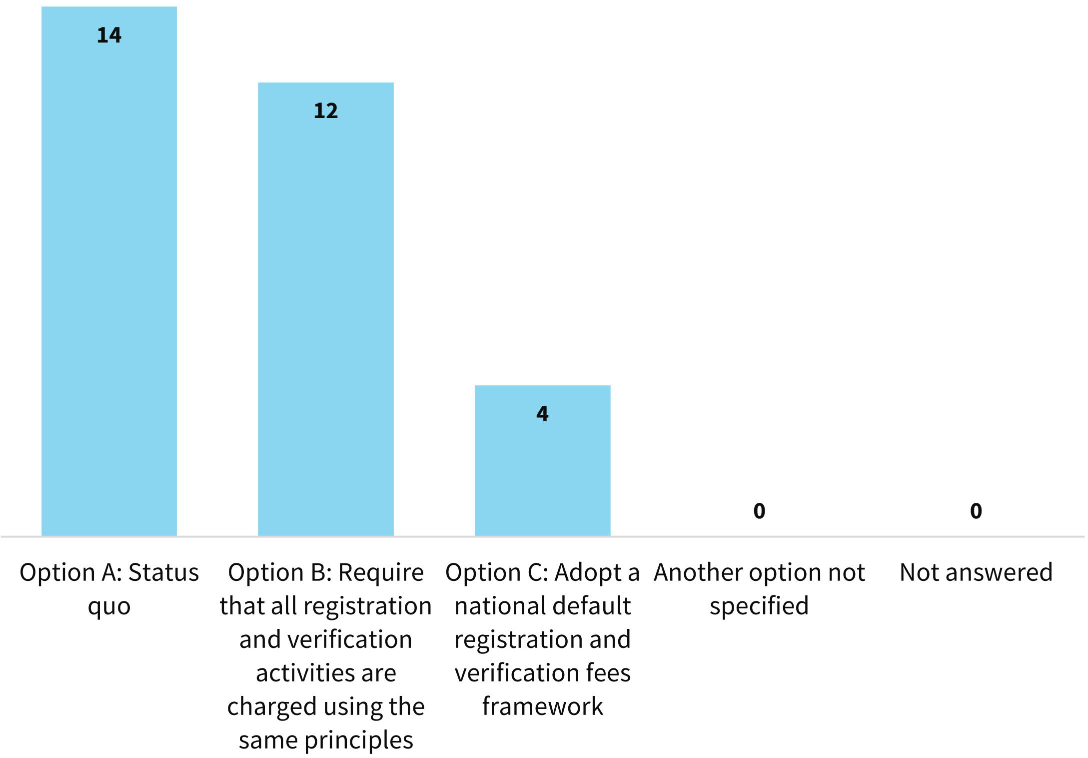
Fees should be adjusted for inflation.

Fees & levies

Options for changing the food registration and verification fees framework

Options for changing the way fees are set for food registration and verification

Core preferences for changing registration and verification fees



Territorial authorities also supported some complementary options for changing registration and verification fees…

- 72% of territorial authorities supported requiring registration and verification fees to adjust annually with changes to the Consumer Price Index (Option D).
- 24% of territorial authorities supported introducing a statutory requirement for cost recovery reporting by local authorities (Option E).
- 24% of territorial authorities supported implementing consistent invoicing practices across all regions (Option G).
- Only 14% of territorial authorities supported the option to remove renewal fees (Option F) and to combine invoicing across regions for both the food safety and alcohol licensing regulatory systems (Option H).

Regulators also told us that…

The current fees framework already enables cost recovery and local decision-making.

Renewal fees cover ongoing costs associated with food safety regulation, monitoring complaints, educating food businesses, and supporting broader regulatory functions.

Most territorial authorities already adjust hourly charges annually to reflect inflation and consumer price index to maintain cost-recovery.

They support improvement for national consistency and transparency in principle and adds value to the customer experience.

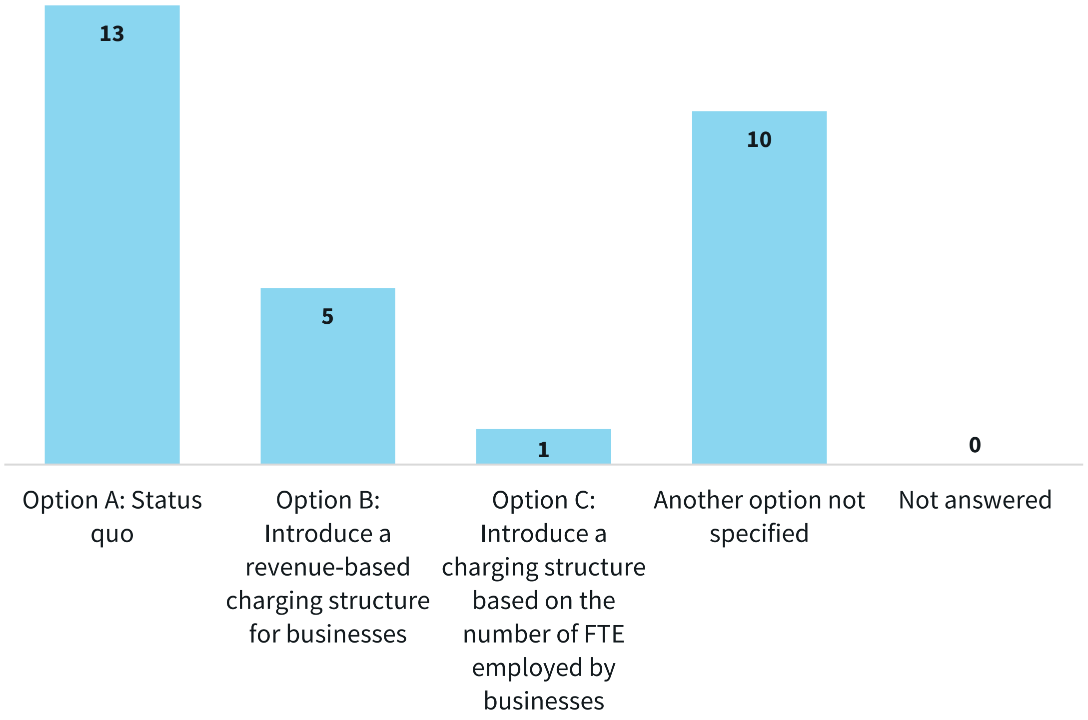
Submitters said they would prefer better guidance to improve transparency rather than making systemic changes.

Fees & levies

Options for changing the food business levy

Options for changing the charging framework for the food levy

Core preferences for changing the food levy



Territorial authorities also supported some complementary options for changing the food levy…

- 93% of territorial authorities supported centralising the levy collection mechanism (Option D).
- 41% of territorial authorities supported introducing a statutory requirement for annual reporting on levy income and expenditure (including the performance of the FAIP) by MPI (Option E).

Regulators also told us that…

The food levy charges should be risk based.

Businesses do not understand why they pay the food levy.

Councils / rate payers are responsible for collecting the food levy, but receive no direct benefit.

Food levy collection should be centralised (either through MPI or IR), to reduce administrative burden on territorial authorities.

There was some support for annual reporting as it would enhance transparency and accountability, but submitters emphasised any reporting requirements should be clearly defined.

Five

Information Flows

Submitter views on solutions for improving access to information on regulatory requirements

- The majority of submitters supported improvements to existing tools such as ‘My Food Rules’ and *Compliance Matters*. Two submitters told us they didn’t realise tools like *Compliance Matters* existed until the Review.
- Most submitters emphasised the need for consistency across regulators, forms, and requirements. Another submitter told us there should be standard forms that councils can adapt.
- Some submitters recommended MPI endorse an AI tool to supplement education and guidance.
- Two submitters said there needs to be better access to translations and interpreters to help provide better business support.
- One submitter recommended pre-application meetings should be required similar to the resource consent process.
- One submitter said improvements cannot focus on tools alone, content needs to be improved (e.g., step-by-step business guides in plain language, clear checklists, and real-world examples) and clear ownership of responsibility.

Submitter views on solutions for improving the provision of compliance information to regulators

- Submitters reiterated the need for national standardisation of forms, verification reports, guidance and training for verifiers. Five submitters also said the amalgamation of council functions may improve standardisation.
- Submitters want a national integrated digital platform that would enable centralised document storage and ensure it is compatible with existing council systems or invest in a shared platform. One submitter said this would enable a “tell us once” approach.
- Seven submitters wanted improved functionality of Business Connect/Form Builder.