Minister for Regulation

Information Release

Removing Offensive Trades from the Health Act 1956

August 2026

This information release is available on the Ministry for Regulation website at:
https://www.regulation.govt.nz/about-us/our-publications/

Documents in this information release

#	Reference	Type	Title	Date
1	MFR2026-030	Key advice paper	Low Complexity Reviews Summary - February 2026: Offensive trades framework duplicates modern nuisance controls	26/02/2026
2	-	Key advice paper	Offensive trades cost-benefit analysis	07/05/2026
3	MFR2026-126	Key advice paper	Draft Cabinet paper: Removing offensive trades from the Health Act 1956	18/06/2026
4	MFR2026-136	Key advice paper	Talking points for CBC meeting of 6 July 2026	02/07/2026
5	CBC-26-SUB-0032	Cabinet paper	Removing offensive trades from the Health Act 1956	06/07/2026
6	CAB-26-MIN-0032	Cabinet minute	Removing offensive trades from the Health Act 1956	06/07/2026

Information withheld

Some parts of this information release would not be appropriate to release and, if requested, would be withheld under the Official Information Act 1982 (the Act). Where this is the case, the relevant sections of the Act that would apply have been identified. Where information has been withheld, no public interest has been identified that would outweigh the reasons for withholding it.

Sections of the Act under which information has been withheld:

9(2)(a) – to protect the privacy of individual persons

9(2)(h) – to maintain legal professional privilege.

Accessibility

Documents are available in PDF format only.

Briefing

MFR2026-030

Ministry for Regulation
Te Manatū Waeture

Annex 2: Summaries s 9(2)(f)(iv)

ANNEX 2: Summaries s 9(2)(f)(iv) [redacted]

1. "Offensive trades" framework duplicates modern nuisance controls

Context: Legacy Health Act requirements impose regulatory costs with no clear benefit

1. The Ministry for Regulation (the Ministry) received a submission from a pet food manufacturer s 9(2)(ba)(i) [redacted] The business is also required to register annually with its local council as an "offensive trade" under the Health Act 1956 (Health Act). Offensive trades are activities historically associated with effects such as odour, waste, vermin, or other public health and nuisance impacts.[2]

2. The submitter advised that this council registration duplicates controls already applied under the RMP, creating ongoing compliance costs and administrative effort, without a clear improvement in public health outcomes.

Background: The offensive trades framework no longer aligns with how risks are regulated today

3. The offensive trades framework under the Health Act is a prescriptive, activity-based registration regime requiring annual council registration for trades listed in Schedule 3. The list reflects mid-twentieth-century industrial and agricultural practices and has not been substantively updated since the early 1970s, requiring registration regardless of scale, location, or whether risks are already managed under other legislation.

4. Since the framework was established, the regulatory system has evolved significantly. Public health and nuisance risks associated with offensive trades are now largely managed through modern, risk-based regimes, including effects-based controls under the Resource Management Act and national regulatory frameworks such as audited Risk Management Programmes under the Animal Products Act 1999. Reflecting this shift, modern regulatory practice has moved away from universal registration toward more targeted, risk-based oversight.

5. As a result, the offensive trades framework increasingly duplicates controls applied under other legislation[3] and no longer functions as a proportionate risk-management tool in many cases. In practice, councils apply registration requirements because they are legally mandated, rather than because they represent the most effective regulatory response.

6. This duplication results in small but recurring compliance and administrative costs for both regulated parties and councils, without a clear link to improved public health outcomes. Initial engagement suggests approximately 110–180 premises in New Zealand are subject to offensive trades registration while also operating under modern regulatory regimes, indicating a limited but ongoing problem.

[redacted]

[2] Examples include: refuse collection, storage and disposal; tallow melting or fat rendering; septic tank desludging; bone boiling or crushing; tanning, fellmongering, or wool scouring; and fish processing or curing.

[3] Such as the Resource Management Act 1991, Animal Products Act 1999, Building Act 2004, Health and Safety at Work Act 2015, Local Governments Act 2002, and Biosecurity Act 1993.

Problem definition

7. The offensive trades regime no longer functions as an effective or proportionate risk-management tool where modern regulatory frameworks already manage the relevant risks. In practice:

    a. Activities listed in Schedule 3 of the Health Act 1956 are often already subject to comprehensive national and local regulation (for example, MPI-audited RMPs and RMA controls).

    b. Councils apply offensive trade requirements because they are legally mandated, rather than because they represent the most effective regulatory response.

    c. The regime requires annual registration regardless of a business's location, scale, or whether risks are already managed through other legislation, resulting in recurring compliance costs that are not clearly linked to risk reduction.

8. This creates regulatory duplication, system incoherence, and unnecessary compliance burden, that poses a direct and administrative cost to the regulated parties and to local authorities without demonstrable public health benefit.

Options

Option 1 – Status Quo – Retain the current framework

9. Retain the existing offensive trades provisions under the Health Act, including Schedule 3 and the requirement for annual council registration and inspection. This means regulatory duplication continues across all affected trades, and there is no consideration of whether the offensive trades framework remains fit for purpose.

Option 2 –Amend Schedule 3

10. Amend Schedule 3 of the Health Act, via an Order in Council, to remove obsolete trades and introduce a targeted exemption from offensive-trade registration where public health and nuisance risks are already managed under other legislative frameworks. This preserves the overall offensive trades framework while reducing regulatory duplication and delivering near-term relief to regulated parties.

Option 3 – Broader review and reform

11. Undertake a wider review of the offensive trades framework to assess whether it remains fit for purpose, followed by potential primary legislative amendment. This provides an opportunity to modernise the framework but may be disproportionate given the likely scale of the problem. It also may not provide timely relief for regulated parties because there is currently no legislative vehicle for change.

Options analysis

Options	Option 1: Status quo	Option 2: Targeted amendment	Option 3: Review and reform
Effectiveness	- Does not address the problem. Regulatory duplication continues, with no mechanism to test ongoing fitness for purpose.	✓✓ Addresses regulatory duplication; preserves councils' ability to	✓✓ Provides a comprehensive stewardship approach, enabling full assessment of the

		manage public health and nuisance risks.	framework's fitness for purpose.
Proportionality	- Applies uniform regulatory requirements regardless of whether risks are already managed under other regimes.	✓✓ Aligns regulatory burden with risk by limiting relief to situations where risks are demonstrably managed through other regimes.	X May be disproportionate given the likely scale of the problem and the availability of more targeted options.
Efficiency	- Continues unnecessary compliance and administrative effort, with no offsetting benefit.	✓✓ Cuts unnecessary compliance, refocuses effort on higher-risk activities, with limited monitoring costs.	✓✓ Potential longer-term gains depend on successful reform, with delayed and uncertain benefits.
Feasibility	- Highly feasible, as it requires no legislative or operational change.	✓ Low implementation complexity via Order in Council; not currently on the MOH work programme and may require MfR resourcing.	XX Requires a suitable vehicle for primary legislation change; does not align with current MOH priorities, limiting near-term deliverability.

Cost-benefit analysis

12. Using conservative assumptions, the cost-benefit analysis estimates that removing duplicated offensive trades registration requirements would deliver a positive net present value benefit of approximately $313,158 over a 10-year period. This reflects the elimination of recurring registration fees and associated administrative effort, offset by a one-off transition cost for councils in the first year.

Scale of the problem, engagement, and feasibility

13. The Ministry has undertaken initial, targeted engagement to assess the scale of the issue and feasibility of reform. Early input from local authorities indicates the number of registered offensive trades is low, likely no more than 15 per council and much fewer for smaller councils. This supports the view that a targeted intervention is the most proportionate response, while recognising that further validation across a wider range of councils is required.

14. The Ministry of Health (MOH) has confirmed that comprehensive reform of the Health Act is not a current priority and that there is no identified legislative vehicle for broader change. However, targeted technical amendments to Schedule 3 can be done through an Order in Council, subject to legal advice on mechanisms and safeguards, noting that this work is not currently on the MOH work programme.

15. The New Zealand Institute of Environmental Health supports modernising the framework, particularly where there is regulatory duplication. On balance, while there is support for broader reform in principle (Option 3), the limited scale of the problem and current feasibility constraints support proceeding with Option 2 as a proportionate, evidence-based step that delivers near-term benefits while preserving the ability to consider wider reform in the future.

Risks and mitigations

16. There is a risk the amendment could be seen as reducing oversight. This can be managed by clearly explaining that the change only applies where risks are already addressed by other strong regulatory regimes, and by emphasising that councils retain their general powers to manage public health and nuisance issues, including under the RMA.

17. There is also a risk the amendment could prompt calls for wider Health Act reform. This can be managed by keeping the amendment tightly scoped and clearly linking it to evidence that existing requirements are duplicative or outdated.

Recommendation

18. The Ministry recommends Option 2: a targeted amendment to Schedule 3 of the Health Act. This option provides the most proportionate and feasible response to the issues identified. In particular, it:

    a. can be implemented through an Order in Council, without amending primary legislation;

    b. enables obsolete or no-longer-relevant trades to be removed from Schedule 3, improving the coherence and credibility of the framework; and

    c. removes unnecessary regulatory overlap where modern regimes already manage public health and nuisance risks, while preserving councils' ability to intervene using existing powers under the Health Act and the RMA.

19. Option 2 does not resolve the broader question of whether the offensive trades framework remains fit for purpose. Instead, it provides targeted and time-limited relief where regulatory duplication is clear and risks are already managed through other regimes, while enabling evidence to be gathered on the framework's continuing value until a legislative vehicle for broader reform becomes available.

Next steps

20. If you agree, officials will:

    - validate the number of affected operators and councils to strengthen the cost-benefit case;
    - engage further with MOH and MPI on an appropriate amendment approach; and
    - support MOH to progress an amendment, including clarifying ministerial roles, offering to draft the Cabinet paper, and preparing a letter for you to send to the relevant ministers setting out the proposal and delivery timeline.

Offensive trades cost-benefit analysis

7 May 2026

Mid-sized review

1. Background

The offensive trades framework is a regulatory regime focused on managing nuisance and local public health effects such as odour, waste, vermin, and disease. There are 19 'offensive trades' that are specified in Schedule 3 of the Health Act 1956 (the Act).[1] Under the Health (Registration of Premises) Regulations 1966, offensive trades are required to register annually with their local authority, at an annual fee ranging from $240 to $450. Any offensive trades operating without registration may face penalties up to $1000, with continuing offenses liable to further fines up to $100 per day.

There is little evidence that a proactive monitoring approach is necessary to manage nuisances to public health. All offensive trades are regulated under other legislation, including the Health Act, the RMA, and Business Consent, which are sufficient to manage nuisance and local public health effects.

The Ministry of Regulation is recommending all 19 trades are removed from the offensive trades' framework.

2. Factual and counterfactual

The factual is the scenario where all 19 trades are removed from the offensives trades framework and these firms are no longer required to register with their local authority. The counterfactual is the scenario where these requirements remain in place.

3. Benefits

There are several monetisable benefits in the factual.

First, firms avoid annual registration, renewal, transfer, and inspection fees. While fee payments are, in principle, transfers from firms to authorities and therefore not a benefit, we use these fees as a proxy for the underlying real resource costs of administering the regime. These resource costs include staff time spent processing applications and conducting inspections. We assume the regulatory change in the factual will reduce these administrative activities and that the associated resource savings represent a genuine benefit. Given data limitations, we use fees as an estimate of these real resource costs.

Second, firms enjoy time savings from no longer needing to complete applications, prepare for inspections, or engage with follow-up administrative processes. These time savings represent a reduction in real resource use and are therefore included as a direct benefit.

[1] These are listed in Appendix 1.

Third, some territorial authorities do not fully recover costs through fees and subsidise the offensive trades system using ratepayer funds. Removing the framework reduces these unfunded administrative costs, generating additional real resource savings to authorities.

There are also non-monetised benefits. In the factual, the risk of infringement fines is removed. While fines themselves are transfers and thus their removal is not a true benefit, they are associated with real resource costs such as administrative processing, compliance effort, and legal expenses incurred by both authorities and firms. In the factual, these costs are removed.

Finally, removing registration requirements may reduce delays in establishing or transferring businesses, allowing firms to operate sooner. To the extent that the current system creates administrative bottlenecks, this represents an additional (though unquantified) efficiency gain.

3.1 Fee savings for firms

We estimate there are between 200 and 400 offensive traders operating in New Zealand.[2] Each firm is required to either register or renew their offensive trades licence annually. Licence costs vary by territorial authority but tend to range between $240 and $450. Some authorities also charge 'transfer fees'. Transfer fees are levied at the new owner of an offensive trades' enterprise and average $66. We assume that 1-3% of all OT enterprises are bought and sold every year.[3] In the factual, firms are no longer required to pay either the annual fees or the transfer fees. We estimate this is a cost saving to firms of between **$48,000 and $181,584** per year, which represents a real resource saving.

Table 1: fee savings for firms

	values	
description	**low**	**upper**
estimated number of offensive traders	200	400
annual registration fees	$240	$450
transfer of ownership fees	$0	$132
% firms transferring ownership annually	1%	3%
total fee savings per firm	$240	$454
Total registration fees	$48,000	$180,000
Total transfer of ownership fees	$0	$1,584
Combined fee savings for firms	**$48,000**	**$181,584**

[2] We estimate the number of offensive trades firms by multiplying the median count of offensive trade firms per territorial authorities (5) by the number of authorities (67).

[3] Estimated from annual turnover for SMEs in EU and Australia. Calculations can be found here.

3.2 Resource savings for territorial authorities

Some authorities do not completely recover the cost of offensive trades management through fees. Authorities devote resources to reviewing applications, conducting inspections, and monitoring offensive trades. Although 66% of authorities reported full cost recovery, Dunedin City Council only recovers 60% of costs and Taupo reported that their system is "ratepayer subsidised in practice". In the counterfactual, we assume that cost recovery varies from 80%-100%.

Therefore, we multiply the fees charged to firms by 0-0.2 to estimate the costs borne by the authority (and thus ratepayers). We estimate a cost saving to authorities of between $0 and $37,056 (with a midpoint of $18,528) per annum.

Table 2: savings to territorial authorities

	values	
description	**low**	**upper**
proportion of cost recovery	100%	80%
multiplier for authorities	0%	20%
fees charged to firms	$48,000	$185,584
Additional cost for authorities	**$0**	**$36,317**

3.3 Time savings for firms

Firms must complete an application when applying for and renewing their licence. Some firms may also be inspected by their territorial authority. We assume that the time required to comply with the offensive trades requirements is between 2-6 hours per year. This includes filling out a form, preparing for and being present for inspections, answering any follow up questions from authorities, and administrative activities required. We assume that firms will continue to mitigate public health and nuisance concerns (because these will be required by other regulations).

Assuming a wage rate between $35-$45 per hour, this is a cost of $70-$270 per firm.[4] Given 200-400 firms, this is a total monetised time saving of between $14,000 and $108,000 (with a mid-point of $62,750).

Table 3: time savings for firms

	values	
description	**low**	**upper**
estimated number of offensive traders	200	400

[4] $35 reflects the median hourly wage for all full-time employees and $45 is the median hourly wage for male managers in 2025.

time to complete paperwork/prep for inspections	2	6
value of firm time	$35	$45
total time cost per firm	$70	$270
total time cost savings for all firms	**$14,000**	**$108,000**

3.4 Non-monetised benefits

There are additional benefits in the factual that we do not monetise. First, in the counterfactual, firms can be charged with infringement fines for failing to register. Whilst this fine is a transfer between firms and authorities, we assume it is associated with real resource costs (administrative processing, compliance efforts, legal expenses etc.). In the factual, these costs are removed. Removal of fines may also bring some psychological benefits for firms who no longer must worry about infringement fines. Although this risk is removed in the factual, none of the six authorities contacted had issued a fine. Therefore, we expect this benefit to be small and do not monetise it.

Territorial authorities also take time to process the initial offensive trades applications. If this processing time delays firm activity, this could negatively affect firm revenue. However, new offensive trade enterprises are uncommon (Auckland having no new firms in over 12 years). There is also uncertainty over the precise effect of this processing time (as it is plausible that it falls in the lull period before the business operations begin in full). As such, we do not monetise the benefit.

3.5 Total benefits

The total estimated benefits in the factual are between $62,000 and $325,901 per annum, with a mid-point of $193,950.

4. Costs

Removing 19 trades from the offensive trades legislation will likely require a one-off administrative cost between $100,000 and $300,000 for policy design and legal drafting.[5]

We do not estimate any ongoing costs in the factual. Offensive trades will continue to be regulated under other legislation (such as the Health Act, RMA, Building Act), so we do not foresee any material change in the behaviour of firms or additional negative externalities.

5. Net Benefits

In Year 1, the factual has a net benefit of between -$238,000 and $255,901 with a mid-point of -$6,050. In Years 2-10, we estimate a net benefit of between $62,000 and $325,901, with a mid-point of $193,950.

[5] This is around 30% of the cost of drafting a new regulation.

Using a discount rate of 8%, this is a NPV benefit of between $149,307 and $2,261,767 over 10 years; with a mid-point of $1,205,537.

6. Robustness

Re-estimating the 10-year NPV using a 2% social discount rate gives us $268,059 and $2,885,980, with a mid-point of $1,577,019.

7. Appendix

<u>List of offensive trades</u>

Blood or offal treating
Bone boiling or crushing
Collection and storage of used bottles for sale
Dag crushing
Fellmongering
Fish cleaning
Fish curing
Flax pulping
Flock manufacturing, or teasing of textile materials for any purpose
Gut scraping and treating
Nightsoil collection and disposal
Refuse collection and disposal
Septic tank desludging and disposal of sludge
Slaughtering of animals for any purpose other than human consumption
Storage, drying, or preserving of bones, hides, hoofs, or skins
Tallow melting
Tanning
Wood pulping
Wool scouring

Briefing

MFR2026-126

Ministry for Regulation
Te Manatū Waeture

Draft Cabinet paper: Removing offensive trades from the Health Act 1956

Date	18 June 2026	**Priority**	Medium
Security classification	classification	**Tracking number**	MFR2026-126
Attachments	**Annex 1:** Offensive trades listed in Schedule 3 of the Health Act 1956 **Annex 2:** Terms of Reference for the Offensive Trades Sector Review **Annex 3:** Draft Cabinet paper removing offensive trades from the Health Act 1956		

Action sought

Required from	Action	Deadline
Hon David Seymour **Minister for Regulation**	**Approve** the attached draft Cabinet paper to progress for agency consultation. **Agree** to undertake Ministerial consultation on the attached draft Cabinet paper.	19 June 2026
Hon Simeon Brown **Minister of Health**	**Approve** officials to issue drafting instructions to the Parliamentary Counsel Office to draft an Offensive Trades Order. **Approve** the attached draft Cabinet paper to progress for agency consultation. **Agree** to undertake Ministerial consultation on the attached draft Cabinet paper.	19 June 2026

Contact for discussion if required

Name	Position	Phone number	1st contact
Justine Fitzmaurice	Manager, Regulatory Reviews	s 9(2)(a)	☑
Paul Delahunty	Deputy Chief Executive, Reviews and System Capability	s 9(2)(a)	☐

Minister's office to complete

☐ Approved ☐ Declined
☐ Noted ☐ Needs change
☐ Seen ☐ Overtaken by events
☐ See Minister's notes ☐ Withdrawn

Comments

Briefing

MFR2026-126

Ministry for Regulation
Te Manatū Waeture

Draft Cabinet paper: Removing offensive trades from the Health Act 1956

Date	18 June 2026	**Priority**	Medium
Security classification	In confidence	**Tracking number**	MFR2026-126

Purpose

The purpose of this briefing is to seek approval for agency and Ministerial consultation on the attached draft Cabinet paper to remove offensive trades from the Health Act 1956.

Executive summary

Deregulatory action is possible via Order in Council in the short-term

There is strong support to remove offensive trades from disproportionate registration requirements. Our analysis and consultation with relevant agencies found that the offensive trades framework does not align with modern regulation, contains some duplication, and imposes compliance costs without clear public health benefit.

We can make changes in the short-term that will provide immediate regulatory relief by removing all 19 of the offensive trades listed in Schedule 3 of the Health Act 1956. This will effectively 'empty' the Schedule and remove registration requirements for those trades.

We investigated a complete repeal of Schedule 3 and the Health (Registration of Premises) Regulations 1966. We've been advised that primary legislative change would be required to do this, and there is not an appropriate legislative vehicle at this time.

A draft Cabinet paper is attached to seek Cabinet approval for this proposal

We've prepared a draft Cabinet paper (attached as **Annex 3**) seeking Cabinet approval for our proposal. Subject to your agreement, we plan to undertake agency consultation between 22 and 26 June 2026. We recommend that Ministerial consultation is undertaken in parallel.

Recommended action

The Ministry for Regulation recommends that you:

		Minister for Regulation	Minister of Health
a	**note** the attached Terms of Reference for the review	*Noted*	*Noted*
b	**note** we have undertaken consultation with the Ministry of Health	*Noted*	*Noted*
c	**agree** to remove all offensive trades from Schedule 3 of the Health Act 1956	*Agree / Disagree*	*Agree / Disagree*
d	**agree** that an Offensive Trades Order be drafted to delete all 19 listed offensive trades from Schedule 3 of the Health Act 1956	*Agree / Disagree*	*Agree / Disagree*
e	**note** the attached draft Cabinet paper was prepared in consultation with the Ministry of Health	*Noted*	*Noted*
f	**agree** for the attached draft Cabinet paper to progress for agency consultation between 22 and 26 June 2026	*Agree / Disagree*	*Agree / Disagree*
g	**agree** to undertake Ministerial consultation on the attached draft Cabinet paper between 22 June and 26 June 2026	*Agree / Disagree*	*Agree / Disagree*
h	**agree** for officials from the Ministry of Health to issue drafting instructions		*Agree / Disagree*
i	**agree** that the remaining offensive trades provisions are removed at the next opportunity to amend the Health Act 1956		*Agree / Disagree*

		Minister for Regulation	Minister of Health
Proactive release			
j	**agree** that this briefing be released once decisions are made, with some information withheld in accordance with the provisions of the Official Information Act 1982.	*Agree / Disagree*	*Agree / Disagree*

s 9(2)(a)

Justine Fitzmaurice
Manager, Regulatory Reviews
Ministry for Regulation
Date: 18 June 2026

Hon David Seymour
Minister for Regulation
Date:

Hon Simeon Brown
Minister of Health
Date:

Background

1. In February 2026, the Ministry for Regulation (the Ministry) completed a low complexity review of offensive trades listed in Schedule 3 of the Health Act 1956 [MFR2026-069 refers]. Our preliminary assessment primarily focussed on duplicating requirements for animal products manufacturers. We found that the offensive trades framework:
    - does not align with modern, risk-based regulation
    - duplicates modern regulatory regimes in some instances, and
    - imposes compliance costs without clear public health benefit.
2. The Minister for Regulation agreed with our assessment that targeted amendments to Schedule 3 would provide a suitable, near-term deregulatory action. In March, the Minister for Regulation also agreed to undertake a medium-complexity review into offensive trades to consider broader, system-level issues [MFR2026-069 refers].

Legislative background

3. Schedule 3 of the Health Act 1956 (the Act) currently contains a list of 19 trades (see **Annex 1**) that are historically considered 'offensive' to public health. Offensive, in this context, means trades that are likely to cause nuisances[1] to the public or could be injurious to health (such as through noises, odours, vermin, or waste).
4. These trades are subject to the Health (Registration of Premises) Regulations 1966 (the regulations), which requires them to obtain consent from their local authority before establishing their premises. Any offensive trades operating without registration may face penalties up to $1000, with continuing offenses liable to further fines up to $100 per day.[2] Annual registration applies and ranges from $240-$450.
5. Our review focused on whether a complete repeal of the regulations would be appropriate and feasible. We have prepared a Terms of Reference for this review for noting, attached as **Annex 2**.

Further engagement and analysis have been completed

Local authorities do not believe that offensive trades need to be regulated outside the Health Act 1956

6. We undertook targeted engagement with Taupō District Council, Central Hawke's Bay District Council, and the New Zealand Institute of Environmental Health. We also sought information from the Auckland City Council, Wellington City Council, Christchurch City Council, and Dunedin City Council to inform our review.
7. No local authorities we engaged highlighted any risks or concerns with their registered trades and concluded that removing these regulations would have no impact on their operations. Local authorities do not rely on their offensive trades registers to manage public health risks and nuisances and expressed strong support for repealing them.

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[1] s29 of the Act outline nuisances.
[2] s54 of the Act outlines restrictions on carrying out offensive trades.

Historic trades and duplication with other regulatory regimes

8. Two of the trades listed in Schedule 3 are historic activities that no longer exist in New Zealand (flax pulping and flock manufacturing/teasing of textile materials). The remaining trades in the Schedule are now largely integrated into wider industry activities, with a very small number continuing as standalone trades. In general, these fall into the following industry categories:
   - meat and seafood processing
   - animal rendering
   - waste management and recycling
   - wastewater management and sanitation services
   - textile fibre and leather processing
   - wood and paper manufacturing.
9. Based on available data, we estimate that there could be 200-400 offensive traders operating in New Zealand. There are regional disparities which make it challenging to provide an accurate estimate.[3]
10. These industries are subject to a number of other legislative frameworks and regulatory regimes, of which there is a degree of duplication. Most importantly, many are subject to regimes with their own licensing requirements – particularly those subject to the Resource Management Act 1991 and Animal Products Act 1999. The requirement to annually renew their offensive trade registration is an additional regulatory burden which is no longer proportionate to the actual risk they present to public health.

The Act itself is a backstop for public health offences

11. Nuisances and public health risks are mitigated and managed through the wider Act without the need for registering an offensive trade. A suite of reactive powers exists within the Act to address and mitigate nuisances, and penalties apply to anyone committing an offence under the Act regardless of the type of trade they undertake. In our engagement with local authorities, we found that they do not undertake additional monitoring activities for offensive trades outside of pre-registration and re-registration inspections.
12. If the registration requirement were to be removed, local authorities would see no difference in their day-to-day operations. They already collect adequate information from their regular environmental health monitoring activities and can use reactive powers within the wider Act to enforce any nuisances that arise.
13. Only one local authority that we engaged with has had a case of non-compliance with the registration requirement. They do not plan to issue a penalty, given the operator presents no nuisances or risks to public health, and they are able to continue monitoring the operator through their usual environmental health monitoring activities. This confirms that the registration requirement offers no value to councils.

[3] For example, Christchurch City Council has 47 registered offensive traders while Wellington City Council have had 0 for a number of years and instead rely on the Resource Management Act 1991 to manage trades that could be considered offensive.

Ministry of Health comment

14. We tested our analysis with officials at the Ministry of Health, who completed a trade-by-trade assessment to assess whether any public health risks require additional oversight from the offensive trades' regime. Their assessment concluded that:
    - *Public health risks associated with these activities are now largely managed through modern, risk-based regulatory frameworks, particularly the Animal Products Act 1999 and the Resource Management Act 1991.*
    - *These regimes provide both proactive controls (such as risk management programmes and pre-approval processes) and reactive enforcement tools where issues arise.*
    - *Additionally, general powers under the Health Act remain available to address nuisance or public health risks, regardless of whether a trade is registered as an offensive trade.*

There is an opportunity for deregulation in the short-term

We recommend removing all 19 offensive trades from Schedule 3 of the Act

15. We received strong support from local authorities to remove all 19 offensive trades from Schedule 3 of the Act. Typically, this would require primary legislative amendment through a suitable bill to repeal Schedule 3 completely. However, there are no currently available legislative vehicles to action a complete repeal of Schedule 3 of the Act.
16. We therefore recommend 'emptying' the Schedule. This would involve deleting all 19 offensive trades currently listed in Schedule 3 via an Order in Council in accordance with section 3(1)(b) of the Act. This would, in effect, achieve the same policy intent as a complete repeal of Schedule 3 of the Act.
17. The Ministry of Health has agreed with our recommendation to remove all 19 offensive trades from Schedule 3 of the Health Act 1956 to reduce regulatory duplication.

Stewardship considerations

18. While emptying Schedule 3 of the Act would remove the registration requirements from applying to offensive trades, sections 54 and 55[4] of the Act, and the regulations, would remain. Without the listed offensive trades, those legislative provisions will become legally void or spent.
19. Officials will work with the Parliamentary Counsel Office (PCO) to ensure any legislative stewardship concerns are promptly addressed and do not delay implementation progress. We also consider that the remaining provisions relating to offensive trades in the Act can be 'tidied up' through future amendments to the Act. We therefore recommend that the remaining offensive trades provisions are removed at the next opportunity to amend the Act.

Cost-benefit analysis

20. We estimate cost savings to firms (i.e. offensive trades) of between $48,000 and $182,000 per year through savings on registration and transfer of ownership fees. Firms may additionally

[4] s55 of the Act enables appeals against refusing registration.

benefit from time savings (e.g. filling out forms, preparing for and being present for inspections, answering follow up questions from local authorities), which we estimate at $14,000 to $108,000 per year.

21. While local authorities aim to recover all costs of offensive trades-related activities through their fees, some only partially recover them. We estimate that local authorities could save up to $36,000 per year in avoided costs if the requirements are removed. As rates partially fund offensive trades activities that are not recovered by fees, we expect this will also have a small positive benefit for ratepayers.

22. Over a ten-year period and using an 8% commercial discount rate, we estimate total savings between $149,000 and $2,262,000 in net present-term value.

Next steps

s 9(2)(h) [redacted]

[redacted]

[redacted]

A draft Cabinet paper is attached to seek Cabinet approval for this proposal

25. We've prepared a draft Cabinet paper (attached as **Annex 3**) seeking Cabinet approval for our proposal. Subject to your agreement, we plan to lodge the paper on 2 July for the Cabinet Business Committee (CBC) meeting of 6 July 2026.

26. In order to meet this timeframe, we require approval to undertake agency consultation by Friday 19 June. We recommend undertaking Ministerial consultation in parallel between 22-26 June. An alternative consultation period that would still allow us to meet the relevant Cabinet dates is between 24-30 June.

27. A list of Ministers we recommend engaging with is included below.

Minister	Portfolio	Agency
Hon Todd McLay	Minister for Agriculture	Ministry for Primary Industries
Hon Andrew Hoggard	Minister for Food Safety	
Hon Nicola Grigg	Minister for the Environment	Ministry for the Environment
Hon Chris Bishop	Minister for RMA Reform	
Hon Simon Watts	Minister for Local Government	Department of Internal Affairs
Hon Brooke van Velden	Minister for Workplace Relations and Safety	Ministry for Business, Innovation and Employment

28. Following consultation, we will provide a final Cabinet paper to be lodged by 10am 2 July for the CBC meeting of 6 July. Consideration by the Cabinet Legislation Committee (LEG) will follow on 23 July, and final Cabinet consideration on 27 July.

Annex 1: Offensive trades listed in Schedule 3 of the Health Act 1956

Blood or offal treating

Bone boiling or crushing

Collection and storage of used bottles for sale

Dag crushing

Fellmongering

Fish cleaning

Fish curing

Flax pulping

Flock manufacturing, or teasing of textile materials for any purpose

Gut scraping and treating

Nightsoil collection and disposal

Refuse collection and disposal

Septic tank desludging and disposal of sludge

Slaughtering of animals for any purpose other than human consumption

Storage, drying, or preserving of bones, hides, hoofs, or skins

Tallow melting

Tanning

Wood pulping

Wool scouring

Annex 2: Terms of Reference for the Offensive Trades Sector Review

Terms of Reference for the Offensive Trades Sector Review

Purpose

1. The purpose of the regulatory review of the offensive trades sector (the Review) is to reduce unnecessary compliance burden where existing legislation already provides appropriate risk management.

Background

2. Offensive trades are a set of 19 trades that are historically considered as offensive to the public. Offensive, in this context, means trades that are likely to cause nuisances to the public or could be injurious to health (such as through noises, odours, vermin, or waste). We estimate there are around 200-400 offensive trades in New Zealand. Two of these types of trades no longer exist and the remainder fall into wider industry activities, with only a very small number operating as standalone trades.
3. As legislation has evolved, most are subject to multiple enforcement regimes, particularly under the Health Act 1956, Resource Management Act 1991, and Animal Products Act 1999. Under the Health (Registration of Premises) Regulations 1966, these trades are required to register annually with their local authority despite greater risk management protocols existing in other parts of the regulatory system.

Review procedure

Approach

4. For all proposed reviews, the approach is to identify:
   - regulations that are justified;
   - regulations that are not justified but are being addressed by other government workstreams; and
   - regulations that are not justified nor being addressed.
5. To address whether regulations are justified or not, a first principles framework is used. The main components of this framework include consideration of the following questions:
   - What is the rationale for government intervention (i.e., what is the market failure)?
   - If there is a market failure, what is the proportionate response, including if it needs to come from government (e.g., co-regulation)?
   - What are the costs and benefits of regulation and the distribution of those across different parties?
   - How are the regulations working, including compared to equivalent regimes in other countries?

Reporting and oversight

6. The Review team will report to the Minister for Regulation. The Review will provide advice to the Minister that will include the Review's findings and recommendations.

Engagement

7. The Review will seek to hear from a targeted group of stakeholders including local authorities, stakeholder groups, and policy agencies.
8. The Review will primarily engage through online meetings. Consideration will be given as to how we ensure that we consider as wide a range of views as possible.

Scope

9. **In scope** of the Review is regulation applying to offensive trades. Relevant legislation includes:
   - Health Act 1956

- Health (Registration of Premises) Regulations 1966

10. **Out of scope** are wider health reforms that do not apply to offensive trades, including provisions related to nuisances and penalties.

Roles

Cabinet

11. Where appropriate, Cabinet will be responsible for deciding the government's response to the Review recommendations.

Ministers

12. The Minister for Regulation will have oversight and decision-making for the recommendations of the Review. This Review does not affect the portfolio responsibilities or decision-making of other relevant Ministers, and policy decisions on any regulatory changes remain with Cabinet. Other relevant ministers will be informed and engaged as necessary, including:
    - Minister for Health (Hon Simeon Brown)

Agencies

13. The Review will be led by the Ministry for Regulation within its central agency mandate to strengthen the regulatory management system and improve regulatory quality.
14. While the Review will be undertaken with cross-agency and stakeholder input, the Ministry for Regulation retains its independence and the ability to make comments and recommendations that may not be fully supported by other agencies or stakeholders. In saying this, the Ministry for Regulation recognises that change is more likely to succeed and be enduring where there is consensus between Ministers and between agencies. Other agencies will be engaged with where appropriate.

Implementation

15. The Ministry for Regulation will focus on how the Review's recommendations can be implemented. Reviews are independent but findings and recommendations will be socialised with relevant agencies. Recommendations identified through the Review will need to be made with sufficient analysis of implications including costs and resourcing and be agreed to by Joint Ministers and Cabinet where appropriate.
16. The Ministry for Regulation will work in collaboration with the relevant agencies to develop the Review's recommendations.
17. It is expected that Ministers responsible for the regulatory systems will oversee the implementation and prioritisation of any Cabinet decisions.
18. If legislative change is required, it is expected that those changes would be progressed within six months of Cabinet consideration of the recommendations. The responsible portfolio ministers and their agencies are expected to lead the Bill through the legislative process. The Ministry for Regulation may provide some limited support through this period.

Timing and milestones

19. The Review is expected to be launched in **April 2026**, with initial advice on options delivered to the Minister for Regulation in **June 2026**. It is expected that Cabinet will be consulted in **July 2026**.

Annex 3: Draft Cabinet paper removing offensive trades from the Health Act 1956

Not included in information release - superseded by final paper

Aide-mémoire

MFR2026-136

Ministry for Regulation
Te Manatū Waeture

Talking points for CBC meeting of 6 July 2026

Date	2 July 2026	**Priority**	Medium
Security classification	classification	**Tracking number**	MFR2026-136
Attachments	No		

Meeting details

Date	**Meeting type**
6/07/2026	(CBC) Cabinet Business Committee

Contact for discussion if required

Name	**Position**	**Phone number**	**1st contact**
Justine Fitzmaurice	Manager, Regulatory Reviews	s 9(2)(a)	☑
Paul Delahunty	Deputy Chief Executive, Reviews and System Capability	s 9(2)(a)	☐

Aide-mémoire

MFR2026-136

Ministry for Regulation
Te Manatū Waeture

Talking points for CBC meeting of 6 July 2026

Date	2 July 2026	**Priority**	Medium
Security classification	classification	**Tracking number**	MFR2026-136

Purpose

1. This aide-mémoire provides you with talking points to support the Cabinet paper *Removing offensive trades from the Health Act 1956* at the Cabinet Business Committee (CBC) meeting of 6 July 2026.

Talking points

- Following a submission to the Red Tape Tipline, the Ministry for Regulation has identified an opportunity to remove unnecessary, outdated regulatory requirements for offensive trades that will reduce costs for businesses.

Regulatory requirements are outdated and unnecessary

- The offensive trades regime was implemented in the 1960's to manage public health risks associated with business practices that could be offensive, injurious, or a nuisance to public health. This regime is no longer relevant to the modern context.
- Two of these trades no longer exist. The remaining trades are now largely integrated into wider industry activities, with a very small number continuing as standalone trades that are now managed under modern, risk-based regulatory frameworks and general powers under the Health Act.
- In recent years, no enforcement action has been taken against businesses who do not comply with registration requirements, and local authorities confirmed they have sufficient powers under other regimes to monitor and enforce public and environmental health activities without the offensive trades regime. There is therefore no reason to retain these requirements.

Benefits for New Zealanders

- There are an estimated 200-400 offensive trades operating in New Zealand that could save between $48,000 to $182,000 per year on registration and transfer of ownership fees, and could also benefit from administrative time savings estimated at $14,000 to $108,000 per year.
- Local authorities, in practice, do not recover all the costs of administering the offensive trades regime. They could save up to $36,000 per year in avoided costs, and rates can be diverted to other council activities.
- Combined, I estimate between $149,000 to $2,262,000 in total combined savings over a ten-year period as a result of this proposal.

Office of the Minister of Health

Office of the Minister for Regulation

Cabinet Business Committee

Removing offensive trades from the Health Act 1956

Proposal

1 This paper seeks agreement to remove the offensive trades currently listed in Schedule 3 of the Health Act 1956.

Relation to government priorities

2 This work supports the Government's commitment to ensure regulatory requirements are fit for purpose, reduce unnecessary regulatory burden, and maximise economic growth and productivity.

Executive Summary

3 The Ministry for Regulation and Ministry of Health have identified an opportunity to simplify regulatory requirements and reduce costs for businesses currently classed as offensive trades, by removing them from the list of trades required to be registered under the Health (Registration of Premises) Regulations 1966. The offensive trades framework is a legacy, activity-based regulatory regime that does not align with modern regulatory practice.

4 Public health risks associated with offensive trades are now managed through modern, risk-based regulatory frameworks. General powers under the Health Act 1956 are available to address nuisance or public health risks, regardless of whether a trade is registered as an offensive trade.

5 We propose changes to Schedule 3 of the Health Act 1956 that will remove unnecessary compliance costs for businesses and align legislation with current regulatory practice.

Background

6 As the system steward for regulatory management, the Ministry for Regulation has a central-agency role in identifying and addressing regulation that is not fit for purpose, with a clear focus on simplifying requirements and lowering compliance costs for regulated parties.

7 Following a submission to the Red Tape Tipline, an opportunity to simplify registration requirements and reduce costs for businesses classed as 'offensive trades' has been identified. We consider this deregulatory proposal will reduce unnecessary regulatory burden for several trades.

8 Over a ten-year period and using an 8% commercial discount rate, we estimate total savings between $149,000 and $2,262,000 in net present-term value if the registration requirements for offensive trades are removed.

Offensive trades

9 The offensive trades framework is a legacy, activity-based regulatory regime focused on managing nuisance and local public health effects such as odour, waste, vermin, and disease. The trades themselves are a list of 19 trades, businesses, manufactures, and/or undertakings. A list of these trades is attached as **Annex 1**.

10 Offensive trades are listed in Schedule 3 of the Health Act 1956 (the **Act**). Under the Health (Registration of Premises) Regulations 1966, these trades are required to register annually with their local council, at an annual fee ranging from $240 to $450. Any offensive trades operating without registration may face penalties up to $1000, with continuing offenses liable to further fines up to $100 per day.

11 Based on available data, we estimate that there are around 200-400 offensive trades operating in New Zealand.[1] Two of the trades listed in Schedule 3 are historic activities that no longer exist in New Zealand (flax pulping and flock manufacturing/teasing of textile materials). The remaining trades in the Schedule are now largely integrated into wider industry activities, with a very small number continuing as standalone trades. In general, they fall into the following industry categories:

11.1 meat and seafood processing

11.2 animal rendering

11.3 waste management and recycling

11.4 wastewater management and sanitation services

11.5 textile fibre and leather processing

11.6 wood and paper manufacturing

Analysis

12 Historically, the offensive trades regime allowed local authorities to proactively manage nuisances to public health in the absence of modern, risk-based management regimes. In modern practice, offensive trades are subject to other legislative frameworks and regulatory regime with their own licensing requirements, particularly the Resource Management Act 1991[2] and the Animal Products Act 1999.

[1] Stakeholders noted the figure may be lower than estimated as regional differences in regulatory practice make it challenging to provide an accurate estimate. For example, Christchurch City Council has 47 registered offensive trades while Wellington City Council have had 0 for a number of years and instead rely on the Resource Management Act 1991 to manage trades that could be considered offensive.
[2] The Natural Environment and Planning Bills also contain provisions for managing contaminants into the environment to protect public and environmental health.

13 Where these regimes don't apply, the Act contains a suite of reactive powers for managing nuisances and public health risks.[3] In particular, the Act enables local authorities to abate nuisances, regardless of whether they are registered as an offensive trade.[4]

14 An assessment of each trade was completed by the Ministry of Health which confirmed that these powers, and those under specific licensing regimes, are sufficient to manage nuisances and public health risks.

Engagement with local authorities and industry bodies

15 Targeted engagement was undertaken with Taupō District Council, Central Hawke's Bay District Council, and the New Zealand Institute of Environmental Health. Information was also sought from the Auckland City Council, Wellington City Council, Christchurch City Council, and Dunedin City Council.

16 No local authorities highlighted any risks or concerns with their registered trades and expressed strong support for removing registration requirements. They concluded that removing these regulations would have no impact on their operations. They highlighted that the offensive trades regime offers limited powers to manage nuisances or public health risks associated with offensive trades, with enforcement largely relying on other relevant licensing regimes, such as the Resource Management Act 1991, or reactive powers within the Act to address these risks.

17 Only one local authority had a case of non-compliance with the registration requirement. They do not plan to issue a penalty, given the operator presents no nuisances or risks to public health, and they are able to continue monitoring the operator through their usual environmental health monitoring activities. We are not aware of any other uses of penalties under the offensive trades regime.

Cost-benefit analysis

18 We estimate potential cost savings at:

18.1 $48,000 to $182,000 per year for firms (i.e. offensive trades) through savings on registration and transfer of ownership fees. They may also benefit from time savings, estimated at $14,000 to $108,000 per year. This includes the time saved by firms from filling out forms, preparing for and being present for inspections, and answering follow up questions from local authorities.

18.2 $36,000 per year for local authorities in avoided costs.[5] As rates partially fund offensive trades activities that are not covered by registration fees, there may be a small positive benefit to ratepayers.

[3] Section 29 of the Act outlines nuisances. Section 34 of the Act provides local authorities with the power to abate nuisance without notice.
[4] Section 64(a) of the Act provides a general bylaw-making power for local authorities to regulate for the purposes of improving, promoting, or protecting public health, and preventing or abating nuisances.
[5] While local authorities aim to recover all costs of offensive trades-related activities through their fees, some only partially recover them. In practice, these activities are partially subsidised by rates.

18.3 $149,000 to $2,262,000 in total combined savings over a ten-year period, in net present-term value.[6]

19 We do not perceive any unintended consequences of this policy change. Engagement with local authorities and industry bodies has confirmed that the offensive trades regime is outdated, and powers exist elsewhere that more appropriately manage nuisances and risks to public health.

Implementation

20 Schedule 3 of the Act may be amended or omitted through an Order in Council. Following Cabinet's agreement, the Ministry of Health will engage with the Parliamentary Counsel Office to make targeted amendments that will delete the list of offensive trades from the Schedule. This will remove registration requirements from applying to those trades.

21 Sections 54[7], 55[8], 64(p)[9], and 64(q)[10] of the Act will remain in force. As an amendment to the Health Act 1956 is required to amend these sections, officials will consider repeal of those provisions at the next suitable legislative opportunity.

Cost-of-Living Implications

22 This work aims to simplify regulatory requirements and lower compliance costs for regulated parties.

Financial Implications

23 There are no financial implications arising from the proposals in this paper.

Legislative Implications

24 An Order in Council will be drafted to amend Schedule 3 of the Health Act 1956, removing all 19 items currently listed in that schedule (offensive trades).

Impact Analysis

Regulatory Impact Statement

25 The Ministry for Regulation has determined that this proposal is exempt from the requirement to provide a Regulatory Impact Statement on the grounds that the economic, social or environmental impacts are limited and easy to assess.

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6 Calculated using an 8% commercial discount rate.
7 Section 54 of the Act outlines restrictions on carrying on offensive trades.
8 Section 55 of the Act outlines the process of appeal for decisions to refuse registration of an offensive trade.
9 Section 64(p) of the Act allows local authorities to make bylaws regulating the situation of buildings used for or in connection with offensive trades.
10 Section 64(q) of the Act allows local authorities to make bylaws regulating the conduct of offensive trades, and of manufactures and processes which may be offensive or dangerous to the persons employed in or about the same or injurious to health.

Climate Implications of Policy Assessment

26 The Climate Implications of Policy Assessment (CIPA) team has been consulted and confirms that the CIPA requirements do not apply to this policy proposal, as the CIPA criteria are not met.

Population Implications

27 There are no population implications arising from this proposal.

Human Rights

28 There are no New Zealand Bill of Rights Act 1990 or Human Rights Act 1993 implications arising from this proposal.

Use of external Resources

29 No external resources have been used in the development of this proposal.

Consultation

30 The following agencies were consulted on this paper: Health New Zealand | Te Whatu Ora, Ministry for Primary Industries, Ministry for the Environment, Ministry for Business, Innovation and Employment, Department of Internal Affairs, and the Parliamentary Counsel Office.

31 Engagement was undertaken with the Auckland City Council, Taupō District Council, Central Hawke's Bay District Council, Wellington City Council, Christchurch City Council, Dunedin City Council, and New Zealand Institute of Environmental Health in the development of this proposal.

Communications

32 Subject to Cabinet's approval, a joint statement will be issued by the Minister of Health and the Minister for Regulation to announce changes to the offensive trades regime.

Proactive Release

33 We propose to release this Cabinet paper and associated Cabinet decisions following announcement of the proposal, subject to any appropriate redactions under the Official Information Act 1982.

Recommendations

The Minister of Health and the Minister for Regulation recommend that the Committee:

1 **note** that the offensive trades framework is a legacy, activity-based regulatory regime that does not align with modern regulatory practice;

2 **note** that offensive trades are listed in Schedule 3 of the Health Act 1956;

3 **note** that there are costs for businesses and councils to register offensive trades annually, as required by the Health (Registration of Premises) Regulations 1966;

4 **note** that public health risks associated with offensive trades are now largely managed through modern, risk-based regulatory frameworks and general powers under the Health Act 1956 to address nuisance or public health risks;

5 **agree** to delete the list of offensive trades listed in Schedule 3 of the Health Act 1956 by Order in Council;

6 **authorise** the Minister of Health to instruct the Parliamentary Counsel Office to draft an Order in Council to delete the list of offensive trades listed in Schedule 3 of the Health Act 1956;

7 **invite** the Minister for Regulation to report back to Cabinet two years after these regulatory changes take effect and officials have assessed the outcomes of their implementation.

Authorised for lodgement

Hon Simeon Brown

Minister of Health

Hon David Seymour

Minister for Regulation

Annex 1: Offensive trades listed in Schedule 3 of the Health Act 1956

Blood or offal treating

Bone boiling or crushing

Collection and storage of used bottles for sale

Dag crushing

Fellmongering

Fish cleaning

Fish curing

Flax pulping

Flock manufacturing, or teasing of textile materials for any purpose

Gut scraping and treating

Nightsoil collection and disposal

Refuse collection and disposal

Septic tank desludging and disposal of sludge

Slaughtering of animals for any purpose other than human consumption

Storage, drying, or preserving of bones, hides, hoofs, or skins

Tallow melting

Tanning

Wood pulping

Wool scouring

CBC-26-MIN-0032

Cabinet Business Committee

Minute of Decision

This document contains information for the New Zealand Cabinet. It must be treated in confidence and handled in accordance with any security classification, or other endorsement. The information can only be released, including under the Official Information Act 1982, by persons with the appropriate authority.

Removing Offensive Trades from the Health Act 1956

Portfolio **Regulation / Health**

On 6 July 2026, the Cabinet Business Committee:

1 **noted** that the offensive trades framework is a legacy, activity-based regulatory regime that does not align with modern regulatory practice;

2 **noted** that offensive trades are listed in Schedule 3 of the Health Act 1956;

3 **noted** that there are costs for businesses and councils to register offensive trades annually, as required by the Health (Registration of Premises) Regulations 1966;

4 **noted** that public health risks associated with offensive trades are now largely managed through modern, risk-based regulatory frameworks and general powers under the Health Act 1956 to address nuisance or public health risks;

5 **agreed** to delete the list of offensive trades in Schedule 3 of the Health Act 1956 by Order in Council;

6 **authorised** the Minister of Health to issue drafting instructions to the the Parliamentary Counsel Office to give effect to the decision above;

7 **invited** the Minister for Regulation to report back to Cabinet two years after the above regulatory changes take effect and officials have assessed the outcomes of their implementation.

Sam Moffett
Committee Secretary

Present:
Rt Hon Christopher Luxon
Hon David Seymour
Hon Nicola Willis
Hon Chris Bishop
Hon Simeon Brown
Hon Paul Goldsmith
Hon Louise Upston
Hod Todd McClay
Hon Brooke van Velden

Officials present from:
Officials Committee for CBC