Attachment C: Full Submissions

Environmental Health Proposed Fees and Charges Review



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, June 12, 2017 4:08:10 PM **Last Modified:** Monday, June 12, 2017 4:13:37 PM

Time Spent: 00:05:26 IP Address: 203.173.150.226

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Q1: I am giving a submission as:	An organisation	
AGE 2		
Q2: Name of organisation	Southern Bars	
Q3: Would you like to include your name as part of this submission?	No	
AGE 3		
Q4: Full name	Respondent skipped this question	
Q5: Email address		
Q6: Postal address		

PAGE 4

Q7: Do you agree with the Environmental Health	No	
Proposed Fees and Charges Review?		

Q8: Please explain your above answer:

The proposal seems fair when first read however there is no mention of what the costs are or what they could possibly be. As we have seen in Liquor licensing a increase in fees has not made a more efficient service. I would suggest by adding this new proposal we will only see a more complicated and slower processing of our FCP.

Q9: I understand that all submissions will be treated as public information. Your name and comments will be publicly available, however we will not disclose your contact details.



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Tuesday, June 20, 2017 10:06:57 AM **Last Modified:** Tuesday, June 20, 2017 2:59:14 PM

Time Spent: 04:52:17 IP Address: 222.155.140.212

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Q1: I am giving a submission as:	An organisation
PAGE 2	
Q2: Name of organisation	cafe society
Q3: Would you like to include your name as part of this submission?	Yes
PAGE 3	
Q4: Full name	alan mchattie
Q5: Email address	
Q6: Postal address	
PAGE 4	
Q7: Do you agree with the Environmental Health Proposed Fees and Charges Review?	Yes

Environmental Health Proposed Fees and Charges Review

Q8: Please explain your above answer:

We as a small food business wish to comment on the proposed restructuring of Food Safety Fee structure.

We support QLDC proactive approach to assisting Hospitality businesses in the district and certainly appreciate any real cost savings to our business.

The QLDC district is brimming with Cafes and Restaurants and support the authority in making a concerted approach to an uncomplicated, minimal cost sustainable and a transparent system of charge out. As a comparison, Central Otago District Council only charge annual premises registration of \$100.00 and inspections of \$250.00 and grading of such premises is at no extra cost.

As Cafe operators, we totally support and work very hard to comply with the current version of NZ wide Food Safety compliance, however we consider that the system is too comprehensive, over engineered and excessively time consuming and exausting to the point where it becomes stressful on the staff and the business.

Hospitality businesses in the QLDC district are struggling to gain and retain hospitality employees (due to the nature of transients and purely the ability to stay in the district due to cost of living), this alone puts takes a massive chunk of time and resources out of the business to keep up with the FCP. We suggest that QLDC environmental health approach the FCP in a much more universal manner that addresses the relevant and primary concerns of the NZFSCP and should directly reduce the amount of time an environmental representative needs to spend with a business.

In summary, we support the QLDC price reductions and compliance consequences and any compliance streamlines that reasonably reflect all the other price competitive councils in NZ.

Alan Louise Josh

Q9: I understand that all submissions will be treated as public information. Your name and comments will be publicly available, however we will not disclose your contact details.

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COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, June 20, 2017 3:21:33 PM
Last Modified: Tuesday, June 20, 2017 3:32:24 PM

Time Spent: 00:10:51 IP Address: 103.21.194.38

PAGE 1

PAGE 1	
Q1: I am giving a submission as:	An organisation
PAGE 2	
Q2: Name of organisation	Lochy ltd t/as Hamills Restaurant
Q3: Would you like to include your name as part of this submission?	Yes
PAGE 3	
Q4: Full name	Tony Robertson
Q5: Email address	
Q6: Postal address	
PAGE 4	
Q7: Do you agree with the Environmental Health Proposed Fees and Charges Review?	Yes
Q8: Please explain your above answer:	

as we have now fully entered the new regime it is time to review the charges. My only concern is that there is not an indication of proposed hourly charges. Without some form of re-assurance then there is perhaps no "upper limit" to the charges so our fees could indeed be larger than the existing regime. For that reason I would ask for clarification.

Q9: I understand that all submissions will be treated as public information. Your name and comments will be publicly available, however we will not disclose your contact details.



COMPLETE

Collector: Web Link 1 (Web Link)

Started: Monday, June 19, 2017 7:09:51 PM

Last Modified: Wednesday, June 21, 2017 11:16:20 AM

Time Spent: Over a day IP Address: 203.173.151.171

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An organisation
Cherry Blossom Cakes
Yes
Melissa White

No Q7: Do you agree with the Environmental Health **Proposed Fees and Charges Review?**

Q8: Please explain your above answer:

Dear Councillors,

Thank you for taking the time to read over my submission on the proposed fee and charges review for the Environmental Health Services.

Please note, I agree that the fees and charges need reviewing and there are significant issues that need addressing, but I do not agree that what has been proposed does this.

As mentioned in Point 3 of the introduction. The aim of the review is to have a fee structure that reflects the work needed for businesses. This would provide a system where charges are directly related to the size of the business and the grade obtained.

Also point 7 states: The changes reflect redistributing the fees and charges, to better reflect the charges to a business for the work undertaken.

Environmental Health Proposed Fees and Charges Review

Point 12 states that: The second criterion is based on the level (size) of the business, e.g. a coffee cart would be a level 2 while a ski field with multiple outlets would be a level 4 i.e. a higher cost.

Point 13 states that: This system of charging a business according to their size and how well they are performing in relation to food safety is a fairer system to reflect the work undertaken and to reward good food operators.

It also states in point 26. Disadvantages: If the Council does nothing there will be areas of work that are not charged for and areas of work that are over charged. Fees will not be accurately reflecting the work undertaken.

Point 27: Advantages: The fees reflect the true cost of providing the services.

All of these points are very valid and definitely require addressing, but the new proposal does not actually address these issues satisfactory. Many of the points above note, that the new fee structure will provide a system where charges are directly related to the size of the business. But this is not the case. The levels that they speak of are to do with 'risk' factors determined by the Ministry of Primary Industries and nothing to do with size.

For example, my cake business, is considered a level 3 business and although I have requested the council to reclassify me as I am a single operator and a mum, so my business is what you would consider less than 1 full time equivalent worker. So under the present and the new system, I would be paying exactly the same in kitchen verification fees as any single site kitchen in town. My business has an annual turnover (yes, turnover, not profit) of \$55,000 -\$60,000.

I am paying to the council the same fee as any large-scale single site restaurant in town. My guess is that their turn over is in the millions each year. Also when you look at the size and complexity of the kitchens' as well. My kitchen is situated in part of my single car garage at home, there is 1 fridge and 1 freezer, 1 staff member, all of my finished products are shelf stable at room temperature, I cook no meats or any other high risk foods. There is no way that my registration and verification of my food control plan takes as long as restaurants in town with kitchen's 2 – 3 times the size, multiple chilling units, dozen's of staff members that require training, recording temperatures of cooked chicken and other high risk foods.

I have been questioning the cost of the registration with the council all year, and I keep getting the same answers, that are just the way it is, we are looking into it. I don't think they have done this satisfactorily.

One of the arguments presented to me earlier this year was, that all businesses need to pay some fees towards the general running of their company cars and general administration. This means that my business is paying the same dollar figure towards these costs, as the likes of Ferg Burger, Botswana Butchery, the list goes on.

This year the fee for verification was \$720. The previous fee I had paid was \$375 per year (after initial sign up of around \$800, which I paid twice as I have moved kitchens). The increase to \$720 is almost double the previous fee. Another point the environmental health officers used for the latest increase was that this is what the councillors had instructed them to do, ie charge the businesses more for the services. I really believe that the councillors did not realise this would also impact small businesses such as myself, so significantly.

I really don't mind paying a fee that truly reflects the cost of my verification. The new figure of \$576 (My kitchen as had an A grade for the past 7 years), I do not believe is a reflection of the cost to the council of registering my kitchen, especially if anyone else with an A grade kitchen, for example Botswana Butchery, pays the same fee.

If my business was classified as a level one 'sized' business, then I would agree with the new fees. I have spoken to the QLDC about this, although they agree my business is not a high risk level and shouldn't be considered the same as large full scale restaurants, they have said that the levels are set by Ministry of Primary Industries and there is nothing they can do about it. So by not changing the fees due to business size during this fee change, they have not actually said what they are going to do in this proposal.

I have spoken directly to the Ministry of Primary Industries, they said that they can't change my level, but that the council sets the fees and when I told them what I was expected to pay they did think that was high for my type of business but that the council sets the fees and I should talk to them. So I find myself in a catch 22 position.

I have been registered with the QLDC for 7 years, I registered before my business started and have always had a registered kitchen to work from. When I moved into my own kitchen 4 years ago, I voluntarily moved onto a food control plan, early at additional cost to myself so that I would already be complaint when the new law passed. The new law has now passed, and I find that I have to pay even more in fees that before, even through this is supposed to more

Environmental Health Proposed Fees and Charges Review

reflect business size and grading history.

There is very little the council can/has done to monitor other non-registered cake decorators in the area. When questioned on this the council have said in the past, it's just too expensive to do anything about this. Now the line is, they have to wait until next year until another part of the law comes into act. So for 7 years, I have paid my fees, I have been compliant and I am working in an area that is not policed, so my competitors (not all, there is a hand full of people in the same boat as me) operate out of unregistered kitchens and pay no GST, income tax or environmental health fees.

Please, I am asking for your help in addressing some of these issues.

I am requesting, as councillors, you give the QLDC environmental offices the authority to reconsider the fee structure. As it is currently, or the new proposal, it does not reflect the outcome this proposal was set up to provide – ie a system where charges are directly related to the size of the business and the food safety rating.

If they are not able to change the fee structure, then please provide the council with the authority to make exceptions to these fees when they think it is appropriate.

Thank you for your time, and I look forward to presenting my submission in person.

Yours sincerely

Melissa White Cherry Blossom Cakes

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