



## BRIEFING

### Summary of submissions and roadshow feedback for the Work Health and Safety consultation

<b>Date:</b>	20 March 2025	<b>Priority:</b>	Medium
<b>Security classification:</b>	In Confidence	<b>Tracking number:</b>	BRIEFING-REQ-0011312

Action sought		
	Action sought	Deadline
Hon Brooke van Velden <b>Minister for Workplace Relations and Safety</b>	<b>Note</b> the summary of submissions and roadshow feedback for the Health and Safety consultation; and  <b>Agree</b> that the summary of submissions be proactively released following Cabinet decisions.	4 April 2025

Contact for telephone discussion (if required)			
Name	Position	Telephone	1st contact
Nita Zodgekar	Acting Manager, Health and Safety Policy	Privacy of natural persons	✓
Jeremy Schofield	Principal Advisor, International Labour Policy	04 4897 5484	

The following departments/agencies have been consulted
NA

Minister's office to complete:

☐ Approved

☐ Declined

☐ Noted

☐ Needs change

☐ Seen

☐ Overtaken by Events

☐ See Minister's Notes

☐ Withdrawn

Comments



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Date:	20 March 2025	Priority:	Medium
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### Purpose

To provide you with the summary of submissions and roadshow feedback for the Work Health and Safety public consultation, and to seek your approval for this to be proactively released following Cabinet decisions.

### Recommended action

The Ministry of Business, Innovation and Employment recommends that you:

- a **Note** the summary of submissions and roadshow feedback (the summary) for the Health and Safety public consultation.

Noted

- b **Agree** that the summary be proactively released along with other materials following Cabinet decisions on the paper *"Health and safety reform: system-wide changes"* [CBC-25-SUB-0004 refers].

Agreed

Nita Zodgekar  
Acting Manager, Health and Safety Policy  
Labour, Science and Enterprise, MBIE

20 / 03 / 2025

Hon Brooke van Velden  
Minister for Workplace Relations and  
Safety

23 / 03 / 25

## Background

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1. To support your Work Health and Safety reform, in May 2024 Cabinet agreed to release the consultation document *Have Your Say on Work Health and Safety*. This consultation ran from June to October 2024 and was supported by an associated online survey seeking feedback on what is working well and what needs to change. There were 487 submissions in response to the public consultation document and survey.
2. You also undertook a series of roadshows and site visits, inviting discussion and feedback on the performance of the work health and safety regulatory system. The roadshows covered 11 towns and cities, 23 meetings and 15 site visits across the country. Over 600 people attended these meetings, representing a range of stakeholders, including businesses, workers, health and safety professionals, local government and community organisations.
3. Feedback from consultation survey responses and roadshows has been collated into the attached summary document *'Have your say on Work Health and Safety: Summary of feedback from roadshow meetings and submissions to the public consultation – June to October 2024'* (**Appendix 1**).

## High-level summary of submissions and roadshow feedback

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4. Consultation feedback traversed a broad range of sectors, regions, workers and employers, and small and large organisations.
5. Feedback from the survey submissions tended to be relatively evenly split between positive and negative views across the system (such as businesses' experiences with WorkSafe) and with less consensus about specific issues for improvement. Feedback from the roadshows tended to be stronger, with clearer issues and concerns emerging as themes.
6. Feedback on the Regulator from both submissions and the roadshows most often related to WorkSafe rather than the other two designated Regulators (Maritime New Zealand and the Civil Aviation Authority).
7. Collectively, the high-level themes from the roadshows and submissions are consistent with our previous advice on stakeholder feedback. They indicate a range of areas and issues for improvement across the system, as follows:
  - i. ***While the Act is generally working well, there is need to increase certainty within some areas of the system, and to reduce unnecessary compliance and red tape.*** This included outdated regulations such as the Health and Safety at Work (Hazardous Substances) Regulations 2017, updating WorkSafe guidance and Approved Codes of Practice, and addressing ambiguities within Part 2 of the Act (such as in relation to officers' duties and landowner liabilities). The roadshows in particular highlighted that such ambiguity has contributed to a proliferation of complex and costly work health and safety consultancies and paper-based systems, regardless of whether they are practical, useful or proportionate – as businesses look for clarity elsewhere.
  - ii. ***There is need for improvements to WorkSafe.*** Responses from Submitters on their interactions with WorkSafe were sharply divided, indicating a range of positive and negative experiences across its functions. Roadshow feedback was clearer, highlighting a need for more consistency, clarity and support (as opposed to punitive and reactive actions) for businesses regarding their work health and safety obligations.
  - iii. ***There are discrete problems within the Act require attention:*** At a broad level, Submitters were sharply divided about whether the work health and safety regulatory system's settings are correctly balanced. In addition to the need for improved guidance

and certainty relating to certain parts of the work health and safety system, overlaps with other regulatory systems (such as the Land Transport Act 1998) was identified as an issue.

**We propose that the summary be proactively released**

8. We seek your agreement that the summary document be proactively released along with other materials following Cabinet decisions on the paper *“Health and safety reform: system-wide changes”* [CBC-25-SUB-0004 refers].

## **Annex**

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*Annex One: Have your say on Work Health and Safety: Summary of feedback from roadshow meetings and submissions to the public consultation – June to October 2024*

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