



Department of
Building and Housing
Te Tari Kaupapa Whare

Streamlining the Licensed Building Practitioner Scheme

August 2009



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Introduction

This consultation document is your opportunity to comment on the Department of Building and Housing's proposals to streamline the Licensed Building Practitioner (LBP) Scheme, including:

- giving greater recognition to trade-qualified practitioners
- simplifying the building categories for the Site and Design licensing classes
- reinforcing the importance of a licensed building practitioner working within their individual competence
- not proceeding with licensing groups of practitioners where the costs outweigh the benefits
- recognition of other statutory registration systems.

Please use the pages at the back for your comments. Please send this to us by **Friday 25 September 2009**

- email to **lbpconsultation@dbh.govt.nz**
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This consultation document is available for download at **www.dbh.govt.nz**

The New Zealand Licensed Building Practitioner Scheme

Background

The Hunn Report into Weathertightness in 2002¹ identified the capability of building practitioners as one of the deficiencies in the building industry that contributed to systemic failure and the weathertightness problem. Licensing was introduced in the Building Act 2004 to lift practitioner performance and productivity, make practitioners more accountable for their work, and provide consumers with access to information to make informed decisions about the competency of the practitioners they engage.

The Licensed Building Practitioner (LBP) Scheme was launched in November 2007. Ten licensing classes² are in place and a further three are currently under development. The LBP Scheme covers 'all of building' work such as site and design management, as well as individual trades such as carpentry and roofing.

The LBP Scheme is voluntary, with a risk-based mandatory element to be defined in regulation through an Order in Council. The mandatory element, known as 'restricted building work' is a subset of building work that is integral to the integrity of a building, and which (based on risk) must therefore be carried out or supervised by a licensed practitioner.

The scheme is administered by the Government (by the Department of Building and Housing). A Government-appointed statutory Board oversees the scheme through the setting of licensing competencies, hearing of complaints, disciplining of negligent practitioners, and hearing of licensing appeals. In turn, the Department issues licences, manages an on-line public register, sets ongoing skills maintenance requirements, and supports the operation of the Board.

The current scheme is competency-based, with applicants assessed by an independent assessment agency, using assessors recruited from the building industry. Industry qualifications are being re-designed to reflect the licensing competencies, and the aim is for the scheme to be primarily qualifications-based by 2015. This means that applicants up until 2015 will not need to hold qualifications – they will continue to be assessed as to their competence. New applicants from 2015, however, would be expected to hold an appropriate qualification.

The scheme is governed by *the Building Act 2004* (the Act), *LBP Rules 2007*, *Building Practitioners (Licensing Fees and Levy) Regulations 2007*, and the *Building (Designation of Building Work License Classes) Order 2007*. Any proposed changes to the LBP Scheme require Government approval and changes to one or more of these.

The Government is focused on quality regulation, and so is determined to remove red tape in the building and construction sector. As part of this, the LBP Scheme has been reviewed to identify opportunities to streamline and simplify it, and in doing so, reduce the cost and complexity to applicants.

This consultation document addresses each of these streamlining opportunities, and seeks feedback on what is proposed, and the potential impacts.

¹ Bond, I., Hunn, D., Kernohan, D. 2002. Report of the Overview Group on the Weathertightness of Buildings in New Zealand.

² The three licensing classes under development, and the subject of a separate consultation paper, are concrete structure, steel structure, and foundations.

Proposal 1: Giving greater recognition to trade-qualified practitioners

Current situation

Currently, LBP Scheme applicants must provide a work history, job records, a completed questionnaire about those jobs, and appropriate referees. Applicants are then assessed as to their current competence (including knowledge of regulatory requirements) by external expert industry assessors appointed by the Department of Building and Housing (the Department).

Each assessment³ involves a desktop assessment of the applicant's work experience and knowledge to date, followed up by a phone interview with the applicant and a discussion of the applicant's work with selected referees. If the assessor is uncertain about the applicant's current competence then a face-to-face interview occurs.

The only recognition given under the scheme to applicants with appropriate trade qualifications is that they do not have to complete the job records questionnaire⁴. For example, the following carpentry trade qualifications (which include both theory and practical elements) are deemed to be appropriate:

- Certificate of Due Completion of Apprenticeship (Carpentry or Carpentry Joinery)
- National Certificate in Carpentry – Level 4
- National Certificate in Carpentry (Advanced) – Level 4
- Trade Certificate in Carpentry
- Advanced Trade Certificate in Carpentry
- NZ Certificate in Building.

Problem

The current practice of exempting trade-qualified applicants from needing to complete a job records questionnaire is only a minor concession that does little to reduce compliance costs for the estimated 30 percent of applicants who are trade qualified.

Proposal

The Department therefore proposes to introduce a 'fast-track', simple, low-cost application process for trade-qualified practitioners.

Under this proposed fast-track process, applicants with an appropriate 'theory and practical' trade qualification would only need to:

- provide evidence of the qualification
- supply appropriate referees who can confirm their experience, and
- demonstrate current regulatory knowledge.

This process would not be available to Site or Design licensing class applicants.

³ except for those relating to Design licensing classes, which are all face-to-face interviews with assessors

⁴ Bricklaying and Blocklaying applicants who are registered Masons have additional exemptions – refer later in this section for detail.

Discussion points

The downside is that practitioners with a relatively old qualification (eg, one that is a theory-only qualification) but who have worked in the sector for a number of years would not be able to be fast-tracked due to their qualification not being an 'appropriate' qualification.

Requirement for referees

The requirement for referees to be supplied provides the Department with assurance that a qualified applicant is also sufficiently experienced – and therefore has the necessary current competence to be licensed.

Requirement for regulatory knowledge

Regulatory knowledge would still be assessed as it is now. In other words, applicants would be sent a regulatory knowledge booklet to study, and an assessor would then ask a small number of questions to check their understanding. This assessment has been retained because of sector feedback that such knowledge is critical to lifting skill and knowledge levels.

Few, if any, qualifications currently have regulatory knowledge as a mandatory element. The need for such an assessment will, however, reduce over time as trade qualifications are revised to include a mandatory regulatory knowledge component.

The alternative to assessing regulatory knowledge at the time of application is for this to be a mandatory component of ongoing skills maintenance. For example, the Registrar could require that licensed practitioners who are fast-tracked must demonstrate their understanding of regulatory knowledge as part of their skills maintenance programme.

Reduced assessment fees

The Department proposes reducing the assessment fee for fast-tracked applicants to reflect the reduced assessment effort that would be required to process applications.

Currently, applicants pay \$275 or \$330 for being assessed (depending on the type of application). It is proposed that this fee be reduced to between \$80 – \$120. The application fee of \$80 and the annual fee of \$170 would still also be payable.

To set these reduced fees, changes will need to be made to the *Building Practitioners (Licensing Fees and Levy) Regulations 2007*.

Fast-tracking brick and block applicants

Currently, applicants for the Bricklaying and Blocklaying licensing class who are registered masons (ie, registered by the NZ Masonry Trades Registration Board (NZMTRB)), need only provide their registration number, complete a 'knowledge of current building and trade practices' questionnaire, and be assessed for regulatory knowledge in order to be licensed.

This fast-tracked process recognises the robust nature of the NZMTRB registration process. This process involves applicants:

- submitting evidence of training/experience
- submitting three separate project audit reports, one completed and signed by a NZMTRB registration auditor, and the other two by appropriately recognised professionals in the sector
- undergoing an examination of their knowledge of relevant Standards NZS 4210 and 4236, and the Building Code.

The Department is currently considering whether other non-statutory registration schemes, or assessment processes run by industry associations could also be recognised in the same way that the NZMTRB process is.

Proposal 2: Simplifying the building categories for the Site and Design licensing classes

Current situation

The LBP Scheme, and in particular the Site and Design licensing classes, is underpinned by a set of three building categories based on a number of different variables.

Problem

The Department has received feedback from the sector that the current building categories need to be simplified due to:

- **Complexity**
The building categories are overly complex, in that a number of variables need to be worked through in order to determine which category a building would fall into. As such, it can be hard to identify which category a building fits into.
- **Lack of alignment with business practice**
The current building categories do not align with the types of businesses that operate in the sector. That is, businesses usually restrict their scope of enterprise based on the use (residential or commercial) and size of a building. However, any building with a given size and use could fall under any of the three existing categories. This lack of alignment with business practice means that some businesses may have to either change their operating model or employ new (appropriately licensed) people to design a building or oversee construction, causing additional compliance costs.
- **Lack of consideration of variations to building work**
Variations or changes that arise during a building project can have the potential to move a building into a different category than what was originally proposed. This could result in the work becoming outside of the scope of the licensed practitioner who is designing the building or overseeing its construction. Again, this imposes extra compliance costs.

Proposal

Following initial discussions with sector groups, the Department has looked at two options to simplify the building categories.

- *Option 1:* moving to a single category for design and site licensing classes, with applicants for such class submitting project records relevant to their area of competence, and then subsequently working within their area of competence
- *Option 2:* retaining three design and three site licensing classes but reducing the number of tests/qualifications needed to determine each category to:
 - the intended use⁵ of the building
 - the height of the building
 - the external envelope risk score of the building.

After considering the merits of each, **option 2** (as set out in Table 1) is the Department's preferred option as it:

- makes the categories easier to understand
- does not require significant transitional arrangements

⁵ As defined by the *Building (Specified Systems, Change the Use, and Earthquake-prone Buildings) Regulations 2005*

- better aligns with business operating practices
- provides applicants with a reference point as to what work they need to be competent in when they apply to hold a licensing class (the 'one category' option does not provide any such reference point)
- provides licensing assessors with a reference point as to what level of competence they should be seeking an applicant to demonstrate
- provides practitioners with a reference point in the area of work they hold a licensing class in
- provides consumers (eg, potential home owners) with more information as to who they should engage to design their house or oversee construction
- provides the Building Practitioners Board with a reference point for the area of work that a licensed building practitioner is able to carry out or supervise
- licensed building practitioners already holding a Design 3 and/or Site 3 licensing class may be reluctant to be in the same licensing category as those holding a Design 1 or Site 1 licensing class.

Table 1: Building categories – current and proposed

| Category 1 | Category 2 | Category 3 |
|--|--|---|
| <p>Current Buildings that are masonry or timber-framed houses with low-risk designs</p> <p>Based on the following variables:</p> <ul style="list-style-type: none"> - Not an ancillary building or outbuilding - Compliance with NZ Standards 3604 or 4229 - Risk (building envelope with total risk score of 12 or less) - Use either SH (sleeping single home) or SR (sleeping residential). If SR, contains no more household units that are adjacent on a horizontal plane, and share a single common wall - Is not an historic place. | <p>Current Range of buildings from more complex houses to moderate-size multi-use buildings</p> <p>Based on the following variables:</p> <ul style="list-style-type: none"> - Is neither an ancillary building or outbuilding - neither a category 1 or 3 building (ie, no more than 10 metres high) can't have more than 500 people at ground level, 250 people at level one, or 100 people at level 2. Tighter limits apply to sleeping occupants, and to crowds. | <p>Current Range of large or special-use multi-use buildings</p> <p>Based on the following variables:</p> <ul style="list-style-type: none"> - Not an ancillary building nor an outbuilding - Importance – has an importance level of level 3, 4 or 5 based on AS/NZS 1170.0: 2002, <i>Importance Levels for Building Types - New Zealand Structures</i> - In excess of stated occupancy load limits for any of the spaces in a single storey, and all spaces in a single storey. These numbers vary by building type. - Is a category 1 historic place. |
| <p>Proposed Option 2 Simple houses with low-risk designs</p> <p>Based on following variables:</p> <ul style="list-style-type: none"> - SH use (sleeping single home) - Weathertight risk score of 12 or less. | <p>Proposed Option 2 Complex houses (SH use) Medium-sized apartment buildings (SR use) Medium-sized commercial buildings</p> <p>Based on the following variables:</p> <ul style="list-style-type: none"> - Houses with weathertight risk score of more than 12 - occupied floor cannot be more than 10 metres in height above the nearest appropriate exit | <p>Proposed Option 2 Multi-storey apartment buildings (SR use) All other buildings</p> <p>Based on the following variable:</p> <ul style="list-style-type: none"> - Where an occupied floor is more than 10 metres in height above the nearest appropriate exit. |

Proposal 3: Reinforcing the importance of a licensed building practitioner working within their individual competence

Current situation

Some occupational regulatory regimes provide general obligations on members to act within their individual competence. For example, chartered professional engineers have an obligation to work within their competency and not to misrepresent it. The effect is that all chartered professional engineers know that, regardless of any specific obligations about competence, they must always only do work they are competent to do.

The *Building Act 2004* (the Act), on the other hand, does not provide any overarching requirement for a licensed building practitioner to work within their individual competency.

However, the Act and the associated LBP Rules provide a number of mechanisms to ensure that licensed building practitioners work within their individual competency. For example, having the LBP Scheme as competency-based, and assessing competencies as part of the application process.

Other mechanisms include:

- The LBP Rules make it a performance indicator for the applicant to explain the importance of, and to operate within the scope of the individual competence, and to recognise when other expertise is required. The Registrar has regard to the performance indicators when determining whether a competency is met.
- The Act allows the Building Practitioners Board to take disciplinary action against a licensed building practitioner that carries out or supervises work for which they are licensed in a negligent or incompetent manner.
- Restricted building work can only be undertaken by a licensed building practitioner with the appropriate licensing class.

An applicant for a licensing class is assessed as meeting the minimum standards of competency for that class. However, this does not necessarily mean that they are competent to carry out or supervise *all* building work within the scope of their class. For example, a licensed building practitioner with a Carpentry licensing class may be competent to construct timber stairs but not be competent to carry out roofing work.

It is important therefore, for licensed building practitioners to operate within the scope of their individual competence, and to recognise when other expertise is required.

Problem

The LBP Scheme does not explicitly require a licensed building practitioner to always work within their individual competence when undertaking work related to the licensing class they hold.

Proposal

It is proposed to make it clear that licensed building practitioners must work within their individual competence (in regard to work within their licensing class), by placing a specific obligation on them. This would ensure they are clear about their obligation to work within their individual competence for work for which they are licensed. This proposal aligns with what the public would reasonably expect from a licensed building practitioner.

Discussion points

Existing offence

Under the Act, the Building Practitioners Board can already take disciplinary action against a licensed building practitioner who carries out or supervises building work in a negligent or incompetent manner.

This in itself may be sufficient to ensure that licensed building practitioners work within their individual competence.

Working outside a licensing class

If a licensed building practitioner undertakes work outside their individual competence for work not related to their licensing class, no licensing action can be taken by the Building Practitioners Board as the Act is currently drafted.

This means that there is no obligation (explicit or otherwise) on a licensed building practitioner to always work within their individual competence if doing non-restricted building work⁶ *outside* of their licensing class (eg, a licensed roofer doing some general low level carpentry work).

The public are likely to assume that by virtue of being a licensed building practitioner, such a person always undertakes work in a competent manner, and can be held to account by the licensing scheme for that work. Imposing a general obligation for a licensed building practitioner to work within their individual competence in *any* work that they carry out or supervise would mean that the public could be assured that any work undertaken by a licensed building practitioner was of high quality, and that licensing action could be taken where this was not the case.

It is unlikely that licensed building practitioners would perform poor quality work outside their licence class and good quality work within their licence class. In addition, expanding the role of the Board raises practical challenges. For example, there is no easy way of determining 'competence' as the licensed building practitioner would not have been formally assessed in relation to work outside the licensing system. It is also likely to significantly increase the cost of running the Board.

⁶ If the work is restricted building work, it can only be carried out or supervised by a licensed building practitioner holding the appropriate licensing class. Non-restricted building work can be undertaken by any person.

Proposal 4:

Not proceeding with licensing groups of practitioners where the costs outweigh the benefits

The Government is determined to only proceed with regulatory interventions where the benefits clearly exceed the costs.

There are two sets of practitioners where it is unclear whether the benefits exceed the costs. The Department therefore proposes that regulation of such practitioners not proceed.

Building Services licensing class

Current situation

The LBP Scheme currently provides for a 'Building Services licensing class' covering the co-ordination or oversight of some or all of the construction of active building services (eg, emergency lighting, lifts, escalators, fire systems, sprinklers, and air conditioning systems).

Problem

Sector consultation to date has highlighted that there is no occupational grouping that covers the oversight of such a wide range of active building systems. All of the people involved specialise in one system. To license such practitioners would therefore involve developing around 20 new licensing classes, at a cost to the Government of approximately \$2 million. The Department does not consider that the benefits of licensing would exceed this cost.

Proposal

The Department therefore proposes that the licensing of this group of practitioners not proceed, and that provision for a Building Services Licensing class be removed from the *Building (Designation of Building Work License Classes) Order 2007*.

Independently Qualified Persons

Current situation

The *Building Act 2004* currently requires that a group of practitioners (known as 'independently qualified persons' or IQPs) be licensed under the LBP Scheme by 30 November 2010.

IQPs are persons who inspect and maintain specialist building systems (such as automatic systems for fire suppression) and issue formal certificates (known as Form 21As) certifying that a particular system has been maintained in accordance with the applicable compliance schedule.

The regulation of IQPs (assessment standards, approvals, and disciplinary measures) is currently managed by territorial authorities. Work is currently underway to standardise the approval process, and establish a national IQP register.

Problem

A 2007 review of IQP licensing requirements concluded that the current IQP sector is not well-suited to licensing under the LBP Scheme, and would require significant change to move from the current fragmented structure to one that would suit licensing. This is because:

- existing local IQP registers set entry criteria for IQPs in relation to each of the specified systems in the Act. In contrast, a competency-based licensing system should be based around occupational groupings that encompass coherent and related sets of skills and knowledge.
- there is a very wide range of inspection and maintenance tasks and a correspondingly diverse range of occupations and competency levels – this necessitates a very large number of licensing classes
- licensing would cover people who carry out a compliance schedule procedure as a very small part of their business – as opposed to licensing for building work where a person is licensed to carry out work for which they do day-to-day
- the LBP Scheme licenses individuals. Such a scheme would disrupt the company IQP arrangements under which a large portion of IQP work is currently undertaken.

Proposal

Rather than impose unnecessary costs on the IQP sector, it is therefore proposed that the licensing of IQPs by 30 November 2010 under the LBP Scheme not proceed and that the Act be amended accordingly. The Department will instead continue to encourage territorial authorities and the IQP sector to work collaboratively towards having standardised national IQP approval processes, and establishing a national IQP register. It will also work with territorial authorities and the IQP sector to examine alternatives to licensing, in line with the Government review of occupational licensing.

Proposal 5: Recognition of other statutory registration systems

Current situation

The LBP Scheme currently automatically treats building practitioners who are registered to carry out building work under specific statutory registration systems as being licensed under the LBP Scheme – unless their registration (or license) is suspended or cancelled.

The purpose of recognising practitioners assessed under other registration systems is to avoid practitioners paying to be licensed under separate schemes, eliminating duplication and ensuring that accountability between statutory registration systems is clear.

As such, under the *Building (Designation of Building Work License Classes) Order 2007*:

- chartered professional engineers under the *Chartered Professional Engineers Act 2002* are treated as if they hold a Design 3 licensing class
- registered architects under the *Registered Architects Act 2005* are treated as if they hold a Design 3 licensing class.

Problem

Chartered professional engineers are already assessed as being competent to manage the construction or alteration of buildings. This equates to a Site 3 licensing class under the LBP Scheme. They are not, however, treated as if they hold such a licensing class and must therefore seek to be separately licensed under the LBP Scheme. This imposes unnecessary compliance costs on such practitioners.

Similarly, plumbers and gasfitters registered under the *Plumbers, Gasfitters, and Drainlayers Act 1976* are already assessed as being competent to carry out or supervise flashings or penetrations work. In other words, to make a hole in a roof or external wall, and subsequently seal that hole.

Under the LBP Scheme, such work would involve a roofing, external plastering or bricklaying/blocklaying licensing class (depending on whether a roof or external wall was being penetrated).

Proposal

The Department proposes that the *Building (Designation of Building Work License Classes) Order 2007* be amended to treat:

- chartered professional engineers under the *Chartered Professional Engineers Act 2002* as if they hold a Site 3 licensing class
- registered plumbers and gasfitters under the *Plumbers, Gasfitters and Drainlayers Act 1976* as if they hold a roofing licensing class, external plastering licensing class, and bricklaying/blocklaying licensing class depending on the nature of the work being undertaken.

In order to make accountability clear, it is proposed that complaints against a registered plumber or gasfitter who carries out or supervises:

- gasfitting and/or plumbing work, where such work necessarily involves building work (eg flashings or penetrations), would be dealt with by the Plumbers, Gasfitters and Drainlayers Board; and,

- roofing or cladding work, and where no plumbing or gasfitting work is involved, would be dealt with by the Building Practitioners Board.



Feedback

Please have your say.

Your feedback will enable the Department to finalise our advice to the Government to streamline the LBP Scheme.

Proposal 1 – Giving greater recognition to trade-qualified practitioners

Do you agree with the proposed fast-track approach for trade-qualified practitioners? If not, why not?

Comments: _____

How would you be affected if the proposed approach was introduced?

Comments: _____

Do you agree that practitioners with an old theory-only trade qualification should not be fast-tracked?

Comments: _____

Should other types of practitioners also be eligible to be fast-tracked, and if so, who and why?

Comments: _____



Should trade-qualified applicants still be required to demonstrate their regulatory knowledge, or should this instead form part of ongoing skills maintenance once they are licensed?

Comments: _____

Is it reasonable that trade-qualified applicants pay the reduced assessment fees?

Comments: _____

Are there some non-statutory registration schemes, or robust assessment processes run by industry associations that could be recognised in the same way that the NZ Masonry Trades Registration Board process is? If so, what issues would arise, and what conditions would need to be applied?

Comments: _____

Should there be some form of fast-tracked process for Site and Design licensing classes? If so, what would this look like?

Comments: _____



Proposal 2 – Simplifying the building categories for the Site and Design licensing classes

Do you support simplifying the building categories?

Comments: _____

Do you agree with the proposed new set of building categories? If not, why not?

Comments: _____

Are the proposed new categories less complex than the current ones? If not, how can they be simplified?

Comments: _____

Do the proposed categories more align with business practices than the current ones? If not, how can they be better aligned?

Comments: _____

How will you be affected if the proposed building categories are introduced?

Comments: _____



Proposal 3 – Reinforcing the importance of a licensed building practitioner working within their individual competence

Should there be a general obligation for licensed building practitioners to work within their individual competence for work for which they are licensed, or are the grounds for disciplining those who carry out or supervise work (related to their licensing class) in an incompetent or negligent manner sufficient?

Comments: _____

Are there sufficient safeguards and incentives on licensed building practitioners to ensure that if they undertake work outside of their licensing class, they do so within their individual competency? If not, why not?

Comments: _____

If no to the previous question, what is the best way to address this? For example, by imposing a general obligation for a licensed building practitioner to work within their individual competence in *any* work that they carry out or supervise?

Comments: _____



Proposal 4 - Not proceeding with licensing groups of practitioners where the costs outweigh the benefits

Do you agree that the licensing of IQPs should not proceed? If not, why not?

Comments: _____

Do you agree that the Building Services licensing class should be removed from the LBP Scheme? If not, why not?

Comments: _____

If the Building Services licensing class is removed, do you think the current consent, inspection and Code Compliance Certificate process is sufficient to ensure specified systems are installed and operate as intended? If not, why not?

Comments: _____



Proposal 5 – Recognition of other statutory registration systems

Do you think treating chartered professional engineers as if they hold a Site 3 licensing class is appropriate? If not, why not?

Comments: _____

Do you think treating plumbers and gasfitters as if they hold a roofing licensing, external plastering licensing, or bricklaying/blocklaying licensing class (depending of the nature of the work being undertaken), is appropriate? If not, why not?

Comments: _____

Are there any other statutory registration schemes that should also be recognised in the same manner? If so, which ones, and why?

Comments: _____

Are there any non-statutory regulatory schemes that should be recognised in the same manner? If so, which ones, and why?

Comments: _____



General

Are there additional streamlining opportunities not outlined in this consultation paper? If so, please provide details.

Comments: _____



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