



COVID-19 risk assessment review: DOC Visitor Accommodation

Description: DOC Huts

Date: 30/03/2022

| Hazard | Harm the hazard could cause | Inherent likelihood that the harm would occur ¹ | Level of inherent risk (consequence) | Control measures currently in place ² | Are the controls eliminating or minimising the risk? | Unless stated the control measures are effective and fit for purpose so far as is reasonably practicable: | Comments |
|--|---|--|--------------------------------------|---|--|--|--|
| Visitors becoming infected or transmitting COVID-19 by: Exposure to airborne transmission opportunities/close contacts via direct contact between people (e.g., from visitors who are infected) | Workers or other visitors contracting COVID-19 (which could result in serious illness or death) and in turn transmitting to others. | We originally assessed this as 'almost certain/ likely' given most of the population were assumed to be unvaccinated and Delta was in the community. Harm can still occur regardless of vaccination status and is still almost certain/likely (although vaccination does offer some protection particularly if boosted.) | High | Visitors are encouraged to stay home if showing symptoms. | Eliminating | My Vaccine Pass is currently no longer effective in light of high vaccination rate, high immunity from the Omicron outbreak and given the features of Omicron. | Currently, 95.1% of the NZ population are fully vaccinated which means many people may not have any symptoms, we have herd immunity and Omicron is currently the dominant variant. Omicron has broken through the vaccination barrier. |
| | | | | There is significantly reduced visitor demand and occupancy outside of summer / autumn peak. Some Great Walks close for winter period and huts become non-bookable backcountry huts. ³ | Eliminating | | |
| | | | | Localised controls are available to staff to close hut as required ⁴ | Eliminating | | |
| | | | | Localised controls are available to staff to reduce capacity at huts as required. | Minimising | | |
| | | | | Workers and visitors aged 12.3 years+ are required to hold a My Vaccine Pass (vaccination only) unless exempt. ⁵ This does not apply to students enrolled in a registered school who are part of a school group undertaking organised activities. ⁶ | Minimising | | |
| Cleaning and disinfecting in accordance with guidance from Ministry of Health (MoH). ⁷ | Minimising | Hut users can come from many different geographical areas and do not necessarily all come from the same group/ bubble. It is not practical to expect hut users to wear masks (there is an exemption under the | | | | | |
| Frequently touched surfaces regularly cleaned. | Minimising | | | | | | |

¹ NZ Vaccine data and statistics as at 30 March 2022: 96.3% of ages 12+ have had first doses, 95.1% of ages 12+ are fully vaccinated (3,972,660 people), 72.7% of ages 18+ have had a booster (2,578,129 people). See <https://www.health.govt.nz/news-media/news-items/15918-community-cases-817-hospitalisations-24-icu-14-deaths>

² Visitors to the huts are encouraged to follow good hygiene practices as per the list of control measures.

³ Milford, Routeburn, Kepler, Whanganui and Tongariro Great Walk tracks close 30 April 2022, reopening October/November 2022. Heaphy, Paparoa, Abel Tasman, Rakiura, Lake Waikaremoana Great Walk tracks are open all year round.

⁴ Follow DOC Visitor Vaccination Policy Guidance for localised risk assessment process - DOC-6859907

⁵ DOC COVID-19 Visitor Accommodation Vaccination Policy - <https://www.doc.govt.nz/parks-and-recreation/know-before-you-go/vaccine-policy-for-doc-visitor-facilities/#:~:text=Eligible%20people%20aged%2012%20years.to%20use%20DOC%20visitor%20accommodation>. DOC COVID-19 staff vaccination policy - <https://www.doc.govt.nz/about-us/our-policies-and-plans/covid-19-staff-vaccination-policy/>

⁶ School children exemption – this is a result of an amendment to the COVID-19 public health order which came into effect as of 11:59pm 12 March 2022 – see <https://www.legislation.govt.nz/regulation/public/2022/0062/latest/LMS658217.html#LMS658216>

⁷ <https://www.health.govt.nz/covid-19-novel-coronavirus/covid-19-health-advice-public/covid-19-general-cleaning-and-disinfection-advice> last accessed 29 March 2022

⁹ From 11:59pm 12 April 2022, vaccinated Australian citizens and permanent residents can enter NZ and self-test on arrival. From 11:59pm 1 May 2022, vaccinated people from countries who do not need a visa (visa waiver visitors) or visitors from other countries who already hold a valid visitor visa can enter NZ and self-test on arrival. From July 2022, vaccinated travellers arriving under the Accredited Employer Work Visa categories can enter New Zealand and self-test on arrival. From October 2022, all visa categories will reopen including visitor and student visas.

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|--------|-----------------------------|--|--------------------------------------|--|--|---|---|
| | | | | Physical distancing – workers and visitors at least 1m apart from each other. No more than the permitted number of visitors are allowed into the huts at any one time to allow for physical distancing (this may result in reduced capacity at the huts), and signs placed around the hut advising of these rules. Localised risk assessments are undertaken as appropriate. | Minimising | | CPF framework for this) while sleeping or eating in the huts and it is difficult to physically distance. |
| | | | | Where possible, payments are only accepted online via the DOC booking system | Minimising | | For Great Walks it is not unusual for some groups to have a similar itinerary, sharing huts for more than one night. There is the potential for sustained interactions and more time for incubation. |
| | | | | Alcohol based hand sanitiser is provided at all serviced huts (out of reach of children). | Minimising | | The distance from roads of many huts and the remote nature of the tracks means there is going to be difficulty in transporting people and virtually no means of quarantining an infected person at site. This also increases the risk of infection and transmission (as well harm). |
| | | | | Posters on hand washing are prominent in the serviced huts and hand washing facilities are available in the bathrooms. | Minimising | | |
| | | | | Masks to be worn inside, however not when eating or sleeping. | Minimising | | |
| | | | | Air Ventilation (which exchanges old air for fresh air) – opening of windows and doors to enable free flow of air and introduce fresh air for at least 15 minutes. ⁸ | Minimising | | |

⁸ <https://www.health.govt.nz/covid-19-novel-coronavirus/covid-19-health-advice-public/covid-19-ventilation>

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|--|---|--|--------------------------------------|--|--|---|--|
| DOC workers becoming infected or transmitting COVID-19 by Exposure to airborne transmission opportunities/ close contacts via direct contact between people (e.g., from visitors who are infected) | Workers or other visitors contracting COVID-19 (which could result in serious illness or death) and in turn transmitting to others. | As above. Hut wardens live on site which increases their risk and as they interact with almost all visitors during their stay also increases the risk they may transmit to others and from different groups. | High | All DOC staff who are hut wardens are vaccinated ¹⁰ and required to hold a My Vaccine Pass | Eliminating/ Minimising | See above re My Vaccine Pass. | All DOC workers (includes volunteers) are required to be fully vaccinated to work in the huts. There is significantly reduced visitor demand and some seasonal closures over winter which will require less staff time spent at sites – this will also mitigate (if not eliminate) risk in some huts). The risk profile for DOC staff who are not public facing with visitors – but undertaking servicing tasks (maintenance, cleaning for example at the huts) is less than that of DOC workers who deal with the public. They are also less likely to spend time in the huts, need not be in close proximity with the public and have access to PPE. There is still a risk albeit a reduced one of encountering infected surfaces and if there are any airborne virus particles in the areas which they clean. Ventilation is an important control measure to maintain during cleaning. |
| | | | | Workers have been briefed on symptoms of COVID-19 and have been told to stay home if they are showing symptoms. | Eliminating | | |
| | | | | If workers are a close or household contact of a COVID-19 positive case, workers are required to stay home and isolate for 7 days. | Eliminating | | |
| | | | | Workers have been trained on appropriate measures to take | Minimising | | |
| | | | | Rapid Antigen Tests (RATs) will be supplied to some staff that are working alone in a remote locations and access to RAT kits is difficult logistically. ¹¹ | Minimising | | |
| | | | | If a worker becomes unwell at work, a process is in place to isolate them and arrange for them to be sent home to receive medical attention. District teams have a completed Business continuity planning which will provide direction on process to follow. | Minimising | | |
| | | | | Workers don't have contact with contractors ¹² or other DOC staff who undertake cleaning/servicing. | Minimising | | |
| | | | | Where worker meetings are required, they are held indoors / outdoors with 1m distancing and masks are worn. | Minimising | | |
| Where possible, break times are staggered to minimise the number of workers using break room at one time. | Minimising | | | | | | |
| Other control measures as above for visitors (including masks, general cleaning, and disinfecting). | | | | | | | |

¹⁰ Vaccination of workers is a separate risk assessment

¹¹ <http://intranet/about-DOC/covid-19-information-hub/rapid-antigen-tests-rats/>

¹² Contractors present a similar risk profile to that of DOC staff undertaking servicing or maintenance. Contractors are required to have an appropriate COVID-19 health and safety plan to manage the risks associated with COVID-19.

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|--------------------------------------|--|---|--------------------------------------|--|---|---|--|
| Visitor aggression at huts/campsites | Physical or psychological injury to DOC workers. | Possible - likelihood of visitor aggression could occur at some point as COVID-19 fatigue occurs. | Medium | <p>Visitor-facing staff are provided with de-escalation training as part of their role. A staff safety information sheet is available for staff¹³</p> <p>Nationally DOC huts and campsites experience reduced visitor demand outside summer/autumn peak, meaning less staff time spent at huts across network and less time interacting with visitors.</p> <p>Each site should have localised safety protocols to be acted on in case of aggressive behaviour from visitors.</p> <p>All incidents of aggressive behaviours to be reported to manager as soon as possible and contact details of the aggressive visitor can be located within the booking system.</p> <p>Processes are in place to ban abusive and violent visitors or call NZ Police.</p> <p>Staff have access to psychological support through an EAP.</p> | <p>Minimising</p> <p>Minimising</p> <p>Minimising</p> <p>Minimising</p> <p>Minimising</p> | | There have been a few incidents of visitor aggression which have been handled appropriately in accordance with DOC procedures. |

¹³ Staff safety information for implementing the COVID-19 Visitor Accommodation Vaccination Policy - [DOC-6855667](#)

Description: DOC Campsites

Date: 30/03/2022

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|---|--|---|--------------------------------------|---|--|---|----------------------|
| <p>Visitors/ DOC workers becoming infected or transmitting COVID-19 by: Exposure to airborne transmission opportunities / Close contacts via direct contact between people (e.g., from visitors who are infected)</p> | <p>Workers or other visitors contracting COVID-19 (which could result in serious illness or death) and in turn transmitting to others.</p> | <p>Likelihood of infection occurring is possible as people move between the regions to travel to the campsites. At campsites visitors sleep and mostly interact in their own bubbles and are more frequently in the open air (tents, motorhomes etc) or in an outdoor setting.</p> <p>Common indoor areas such as ablution blocks, kitchen facilities and campsite are areas where the risk is increased but are used sporadically by campsite users.</p> <p>With winter coming up, campsites are usually in less use.</p> <p>On-site managers are likely to have their own accommodation and able to limit and control their interaction with visitors. The risk to them arises from sharing ablution and toilet facilities.</p> | <p>Medium</p> | <p>Visitors/ workers are encouraged to stay at home if showing symptoms.</p> | Eliminating | <p>See above re My Vaccine Pass</p> | |
| | | | | <p>Significantly reduced visitor demand and occupancy outside of summer peak.¹⁴</p> | Eliminating | | |
| | | | | <p>Localised controls are available to DOC workers to close campsites as required.</p> | Eliminating | | |
| | | | | <p>Localised controls are available to DOC workers to reduce capacity at campsites as required.</p> | Minimising | | |
| | | | | <p>Workers and visitors aged 12.3 years+ are required to hold a My Vaccine Pass (vaccination only) unless exempt. (This does not apply to students enrolled in a registered school who are part of a school group undertaking organised activities.)</p> | Eliminating/ minimising | | |
| | | | | <p>Cleaning and disinfecting frequently touched communal surfaces.</p> | Minimising | | |
| | | | | <p>Physical distancing – DOC workers and visitors at least 1m apart from each other. No more than the permitted number of visitors are allowed into the indoor communal areas at any one time to allow for physical distancing (this may result in reduced capacity in some indoor settings), and signs placed around the e campsite advising of these rules.</p> | Minimising | | |
| | | | | <p>Where possible, payments are accepted online.</p> | Minimising | | |
| <p>Posters on hand washing are prominent around the campsite and hand</p> | Minimising | | | | | | |

¹⁴ All 300 bookable campsites are open all year round, except for 3 campsites (Peel Forest, West Kerr Bay and a Gisborne campsite which close for a period over winter). Almost all campgrounds experience significantly reduced occupancy outside the peak summer period.

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|--------|-----------------------------|---|--------------------------------------|---|--|---|----------------------|
| | | | | washing facilities are available in the bathrooms. | Minimising | | |
| | | | | Masks to be worn inside facilities. | Minimising | | |
| | | | | Other controls for workers – as above described for huts. | | | |

Description: Sole occupancy lodges and accommodation

Date: 30/03/2022

| Hazard | Harm the hazard could cause | Inherent likelihood that the harm would occur | Level of inherent risk (consequence) | Control measures currently in place | Are the controls eliminating or minimising the risk? | Unless stated the control measures are effective and fit for purpose so far as is reasonably practicable: | Comments |
|---|--|---|--------------------------------------|---|---|---|--|
| <p>Visitors/ DOC workers becoming infected or transmitting COVID-19 by:</p> <p>Exposure to airborne transmission opportunities/ Close contacts via direct contact between people (e.g., from visitors who are infected)</p> | <p>Workers or other visitors contracting COVID-19 (which could result in serious illness or death) and in turn transmitting to others.</p> | <p>This is unlikely to occur as sole-occupancy accommodation is booked exclusively and there is no or very limited interaction with DOC workers in many instances. There is a possible likelihood of harm to workers who arrive to clean arising from airborne particles or surfaces where visitors have not been regularly disinfecting or cleaning, but this would reduce to unlikely if the accommodation is kept cleaned and disinfected as required by the terms of the booking.</p> | <p>Minor</p> | <p>Visitors are encouraged to stay home if showing symptoms.</p> <p>Workers and visitors aged 12.3 years+ are required to hold a My Vaccine Pass (vaccination only) unless exempt. (This does not apply to students enrolled in a registered school who are part of a school group undertaking organised activities.)</p> <p>Cleaning and disinfecting by visitors whilst staying in the accommodation.</p> <p>A thorough clean is undertaken of the property by staff at the conclusion of each stay.</p> <p>Physical distancing – workers and visitors at least 1m apart from each other. No more than the permitted number of visitors are allowed into the house at any one time to allow for physical distancing and signs placed around the property advising of these rules.</p> <p>Ventilation – as above for huts.</p> | <p>Eliminating</p> <p>Eliminating/ Minimising</p> <p>Minimising</p> <p>Minimising</p> <p>Minimising</p> | <p>See above re My Vaccine Pass</p> | <p>Cleaning and disinfecting between occupancies needs to be thorough and in accordance with MoH guidance. Those cleaning need to wear masks inside. Ventilation continues to be an important control.</p> |

Description: **Conclusions and Recommendations**

Date: 30/03/2022

It is important to keep up to date with the pandemic and to adapt and as rules change.

DOC accommodation are our highest risk facilities because they are shared spaces, often in remote locations, off the grid and bring people together from all locations. The initial COVID-19 health and safety risk assessment for visitors¹⁵ was undertaken in a Delta environment at a time when many of the population were unvaccinated. Our initial focus and the then MoH advice was on transmission of Delta which is highly transmissible and carries a risk of harm (severe disease such as hospitalisation, severe illness, and death). The initial health and safety risk assessment was based on multiple layered control measures which included following MoH guidelines, sanitising or washing hands regularly, where practical wearing a mask and physically distancing around others and staying home if unwell. Relying on advice from MoH, the risk assessment determined that vaccination against Delta also presented a higher level of protection as a control measure and significantly moved the profile of risk down in terms of likelihood of transmission and severity of consequence. Consequently, DOC's COVID-19 Visitor Accommodation Vaccination Policy which came into effect from 15 December 2021 required all visitors to PCL&W aged 12.3 years + who are accessing DOC accommodation to be fully vaccinated¹⁶ and have proof of their vaccination status by way of the My Vaccine Pass. People staying in DOC huts or campsites are encouraged to undertake their own risk assessments for themselves and their group. The control measures we implemented have been effective and fit for purpose.

This review notes that since the risk assessment was conducted, Delta has been overtaken by the Omicron BA.2 sublineage in New Zealand and it is increasingly widespread in New Zealand with the Omicron peak in Auckland recently with smaller waves expected. This means the COVID-19 risk profile has moved. Experts are advising that the emergence of Omicron, an even more highly transmissible COVID-19 variant means that a threat exists for both vaccinated and unvaccinated people; the MoH advises that people who are fully vaccinated have less protection against transmission of Omicron than for Delta, but that vaccination still offers some protection. The MoH also advises that protection against infection with either Delta or Omicron decreases over time. A booster dose at 4 months after the end of the first dose will improve protection against Omicron particularly for protection against severe disease such as hospitalisation although does not result in as many people being hospitalised. Omicron can still cause severe illness and even death especially in people who are at risk of severe outcomes. MoH advice is that getting boosted continues to be one of the most important ways people can protect themselves from Omicron and severe illness. There is a much lower risk of being hospitalised if up to date with vaccinations which for Omicron includes a third of booster dose if eligible. As community transmission of Omicron increases, it is less likely there will be a greater risk of COVID-19 in DOC visitor accommodation than there is in the community.

Some specialist medical and scientific experts including the MoH advise that New Zealanders need to plan for and expect further variants as the COVID-19 virus will continue to adapt to survive, and they warn us that Omicron is not to be underestimated as the impact on the body or the impact of long COVID-19 is not fully understood.

Border controls have recently changed, and the Government no longer requires incoming vaccinated New Zealanders and other vaccinated travellers to self-isolate on entry to New Zealand. Australian tourists who are vaccinated will be able to travel to New Zealand from 12 April 2022. These changes introduce an increased level of risk to New Zealanders as these people may be asymptomatic, but they bring with them the risk of seasonal illnesses including the super cold some Australians are experiencing.

Changes have also been made to the way close and household contacts are managed by MoH under Omicron Phase 3 Red which increases the likelihood of an infectious people being in the community, and hence increasing transmission in the community but significantly this also increases population or herd immunity.

The Government has recently announced that CVCs¹⁷ will no longer be a requirement at any traffic light setting after 4 April 2022 at 11:59pm. This is irrespective of what traffic light setting is in place past this date. The technology for My Vaccine Passes will remain available (and is being updated to include boosters) but there will be no mandate requiring its use. The rationale for this change is that we have moved past the point where CVCs are most effective. This approach is being taken by the Government in light of the high vaccination rate (currently 95.1% of eligible New Zealanders are vaccinated which means many people may not have symptoms at all but still be able to pass on the virus to others), there are high levels of acquired immunity from the Omicron outbreak and given the features of Omicron. Omicron BA.2 breaks through the vaccination barrier. However, MoH advise that vaccination (including boosters) continues to be strongly recommended as one of the key public health measures and it provides significant benefits. The Government has indicated that My Vaccine Passes could become mandatory again in the future if there are different variants or circumstances change.

DOC is still able to close accommodation (and has guidance for this) where there is a high risk that is not easily mitigated and is required to work with iwi, communities, and campsite managers to assess risk for specific sites and support them regarding restrictions or closures needed for public safety.

We cannot predict the future with any certainty as to how the pandemic will unfold. We act on best, most up to date official information available, remain vigilant, keep the health and safety risk assessment under review and ourselves briefed on most up to date health advice from the MoH.

Considering the matters referred to above and bearing in mind we are entering the winter season which usually means fewer people in our accommodation (some of which will be seasonally closed), this review supports retention of all existing control measures in DOC accommodation that is open to the public and/or our workers except for the requirement to provide proof of vaccination status for entry. The rapidly changing nature of COVID-19 means we should retain the ability to require My Vaccine Passes in the future.

Recommendations:

- (1) Visitors to DOC accommodation be permitted entry without having to provide proof of vaccination status with a My Vaccine Pass.
- (2) Retention of the current Vaccination Policy and the ability to use CVCs as part of health and safety. To this end, it is recommended that the Vaccination Policy be suspended as of 4 April 2022 to coincide with the Government's roll back of My Vaccine Passes.
- (3) Alternatively, it is recommended that a new paragraph 35 be added to the Policy to enable DOC to *switch* between 'requiring My Vaccine Passes' as a condition of entry and 'not requiring My Vaccine Passes' when supported by a risk assessment;¹⁸ and suspend the following paragraphs of the Vaccination Policy: 12, 17, 20 – 27, 31-32, 34.
- (4) Continue to monitor official health advice and observe current health risk levels in the community.
- (5) Undertake the formal review of the risk assessment referred to in paragraph 10 of the Vaccination Policy as scheduled on 31 May 2022 (unless there is a need to undertake this sooner).

¹⁵ DOC-6860783

¹⁶ As of 12 March 2022, at 11:59pm, students attending activities organised by a registered school are not required to provide proof of vaccination.

¹⁷ CVC means a COVID-19 vaccination certificate issued under [clause 8](#) or [9](#) of the COVID-19 Public Health Response (COVID-19 Vaccination Certificate) Order 2021.

¹⁸ <https://www.business.govt.nz/covid-19/covid-19-protection-framework/>

APPENDIX

Hierarchy of Controls

