



Headquarters  
New Zealand Defence Force  
Defence House  
Private Bag 39997  
Wellington Mail Centre  
Lower Hutt 5045  
New Zealand

OIA-2022-4412.1

27 July 2022

M. Fitzgibbon  
[fyi-request-19537-71112e97@requests.fyi.org.nz](mailto:fyi-request-19537-71112e97@requests.fyi.org.nz)

Dear M. Fitzgibbon

I refer to your further correspondence of 1 July 2022, under the Official Information Act 1982 (OIA), as follows:

*Thank you for your reply to OIA-2022-4412, however this does not satisfy as an answer to the OIA request:*

*"I refer you to DHD Minute 02/2022- NZDF COVID-19 Vaccination Status Health Assessment, provided to you 18 May 2022 {OIA-2022-4377}".*

*The DHD Minute 02/2022 - NZDF COVID-19 Vaccination Status Health Assessment, is a Health Assessment. It is not a Risk Assessment, which is defined as per the NZDF DFO 081 and DFI 0.81. I outlined the DFO and DFI in the original OIA request.*

*If as you are indicating DHD Minute 02/2022 is being used by the CDF as an Alternative to a Risk Assessment then please answer the other questions in the OIA. If there is no Risk Assessment as defined by DFO 081 and DFI 0.81 being used them as per the OIA, provide all the documents requesting to not use one and Authorising not using one. I have reproduced the other questions asked in the OIA below for convenience:*

*(NOTE: DFO's have the status of secondary legislation, i.e. Laws).*

*1. If a Risk Management Assessment was not used, then please provide the document(s)/or email(s) authorising not using one. (Required by DFO081/DFI 0.81) 2. If a Risk Management Assessment was not used, then please provide the document(s)/or email(s) requesting to not use one. (Required by DFO081/DFI 0.81)*

*OR*

*3. If a Risk Management Assessment was not used, and an alternate risk assessment was used in its place, then please provide that Alternate Risk Assessment and the document(s) or email(s) authorising this change. (Required by DFO081/DFI 0.81) 4. If a Risk Management Assessment was not used, and an alternate risk assessment was used in its place, then please provide the document(s)/or email(s) requesting to use an alternative risk assessment in its place. (Required by DFO081/DFI 0.81)*

As previously advised, DFO(T) 06/2022 Application of NZDF Vaccine Schedule was developed with reference to DHD Minute 02/2022. The Minute was not intended to, and did not, constitute a risk assessment under DFO 81 and DFI 0.81. A risk assessment is not required under the DFO 81 framework for the drafting of Defence Force Orders. Instead, the purpose of the Minute was to

provide specialist health guidance to allow the NZDF to conduct risk assessments at appropriate levels across the organisation. As stated at paragraphs 30 – 33, the DHD Minute was designed to inform these risk assessments.

Given the complexity and variety of NZDF workplace and operating environments, individual workplaces conduct environment-specific risk assessments when the Force Health Protection guidelines set out in DHD Minute 02/2022 cannot be met. These are ongoing to manage individuals in specific work contexts. As stated in DFI 0.81, complexity can be broken down into a number of risk assessments that are clustered according to the level at which the risk is being described and/or managed (Chapter 1 Section 2 paragraph 1.2.e.). Note, as these are generated across the NZDF, it would not be possible to source and provide these en masse without a substantial research and collation effort.

You have the right, under section 28(3) of the OIA, to ask an Ombudsman to review this response to your request.

Yours sincerely



**AJ WOODS**

Air Commodore  
Chief of Staff HQNZDF