

# **Submission**

By



To The

**Justice and Electoral Committee**

On The

**Electoral Finance Bill**

**7 September 2007**

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**ELECTORAL FINANCE BILL  
SUBMISSION BY BUSINESS NEW ZEALAND<sup>1</sup>  
7 SEPTEMBER 2007**

**1. INTRODUCTION**

- 1.1 Business New Zealand welcomes the opportunity to comment on the Electoral Finance Bill (referred to as 'the Bill'), released by the Electoral and Justice Committee. Overall, we strongly and unequivocally oppose the Bill, and take the view that it should be reverted back to a full and proper consultative stage with the public before being re-introduced to the Select Committee.

**2. SUMMARY OF RECOMMENDATIONS**

- 2.1 Business New Zealand makes the following recommendations with regard to the Electoral Finance Bill, namely that:

- (a) *That the Bill does not proceed, or at the very least be delayed by way of proper public consultation until after the 2008 general election to ensure it is improved upon to a satisfactory level (p.4);*

**Notwithstanding this primary recommendation, any moves towards changes to the Bill by way of issues relating to third parties should concentrate on the following as a start:**

- (b) *That the proposed regulated period as outlined in the Bill does not proceed, and instead the three month period remains leading up to the day of the general election (p.5);*
- (c) *That clause 5(1) of the Bill is significantly amended to reduce the scope in which an election advertisement is captured (p.7);*
- (d) *That clauses 18(1)(c)(i) and (ii) of the Bill is amended to provide a clearly notion of what is deemed to be offensive and/or likely to cause confusion (p.8);*
- (e) *That the particulars involving those who sign a statutory declaration involving a \$5,000 limit be significantly revised (p.9);*
- (f) *That the maximum amount of third party's total election expenses be significantly raised beyond the \$60,000 as stipulated in the Bill (p.11); and*
- (g) *That the power to issue warrants in respect of illegal practise has a very high threshold. (p.11).*

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<sup>1</sup> Background information on Business New Zealand is attached in the appendix.

### 3. BACKGROUND & GENERAL COMMENTS

- 3.1 The drafting of the Bill was essentially prompted by a few factors, including the *Peters vs Clark* election spending issue, and the Exclusive Brethren spending more than \$1 million campaigning against the current Government before the 2005 general election. While we are not in a position to discuss the issues surrounding these events, we believe attempts via the introduction of the Bill to rectify such issues are poor.
- 3.2 The explanatory notes of the Bill state that the Bill will “*provide more transparency and accountability in the democratic process, prevent the undue influence of wealth, and promote participation in parliamentary democracy*”. These are certainly laudable objectives. Unfortunately, we believe the Bill as it currently stands will not even come close to meeting them. At best, the Bill requires significant rethinking and re-work to get it anywhere near a stage where it should be passed into law. At worst, a clean sheet approach may need to be taken, that involves proper consultation with affected individuals, groups and organisations, to ensure basic democratic rights are not hindered in any shape or form. It is rare for a Bill to be declared ‘draconian’ by Business New Zealand, but we believe it certainly has merit in attaining that title.
- 3.3 The Bill examines issues such as political donations, election expenses, third parties, compliance & enforcement, and broadcasting. Business New Zealand wishes to concentrate the majority of its comments on the parts of the Bill that are devoted to third parties, as this is the area which has the greatest effect on advocacy groups such as ourselves, as well as our Regional Associations, and our 67 Affiliated Industry Groups that we represent.
- 3.4 Of course, the implications of the Bill in terms of free speech and the ability to openly discuss issues of national importance go far wider than incorporated business originations such as Business New Zealand and our direct member associations. We believe that all interest groups will be adversely affected by the Bill, subduing the ability to express opinions.

#### *Business New Zealand – The Voice of Business in New Zealand*

- 3.5 Business New Zealand has been in existence since 2001, and was the amalgamation of the manufacturers and employers federations, both in existence for well over 100 years. Over that time, both the federations and Business New Zealand have consistently taken the approach of what is best for business in New Zealand, as it is the prime driver of growth for the economy. Our advocacy has and continues to be based on policy, not politics, and we regularly comment on regulations and legislation that we believe requires introduction, amendment, or deletion. We are the primary voice of businesses throughout the country, and represent around 76,000 private sector businesses on an extreme wide range of issues, which we are in contact with government officials with on a day-to-day basis. We also have various regular and adhoc forums and groups, which we are either members of or run to enhance and improve policy settings in New Zealand.

- 3.6 Business New Zealand does not oppose an examination of current electoral finance procedures, as the purpose of the investigation ensures the rules governing the process are relevant and that there is a significant level of public transparency regarding funding. However, the Bill simply goes too far in terms of its breadth of definitions and has every potential to radically change the advocacy landscape that Business New Zealand is involved in every three years during an election year.

*No Consultative Process with the Public = Poor Outcomes*

- 3.7 Poor consultation procedures and regulatory processes by the Government are a theme that we are unfortunately finding is increasingly prevalent throughout recent submissions we have sent to the Government. This Bill is no exception. There has been no attempt to release public discussion documents, consult with interested or affected parties, or ask for feedback before any recommendations were proceeded through to a Bill format. History shows such actions are the best policy process to go through to ensure there is effective public consultation. By the time a Bill is introduced to a Select Committee, if proper policy processes have been undertaken, it is usually at a stage where only minor alteration and clarification is required. The current Bill is nowhere near that level of finalisation.
- 3.8 In our submission on the Regulatory Responsibility Bill and our letter to the Regulatory Review Committee, Business New Zealand expressed the idea of an independent regulatory body that would oversee all regulatory practises. This body would effectively also become a 'Gate Keeper' for regulation and legislation, including the proposed introduction of new regulation and adjustments. If such a body were set up in New Zealand, the Electoral Finance Bill would most likely fail any test applied due to poor policy procedure (not to mention severe adverse outcomes).
- 3.9 We note that the Bill has caused a significant amount of discussion amongst various quarters, including other business organisations and associations, interest groups, law commentators, political commentators and other interested parties, because of the wide reaching problems the Bill will cause. In reply to the significant dissatisfaction to the Bill shown by the general public, comments by both the Prime Minister and the Minister of Justice a few weeks after the Bill was introduced have indicated that they 'welcome' changes in its current form. While we would agree that the submission process (both written and oral) provides the typical approach to fine tune and improve the quality of the regulation, this reaction by the Government highlights a regulatory process that has been poorly thought through that such sweeping and dramatic changes are required at the committee stage. Such changes should not occur at a Select Committee stage. It is not the role of the Committee to deliberate on re-designing and intently alter the Bill clause-by-clause, given the Bill is generally poor in quality. If meaningful consultation had taken place, we would not have reached this point.
- 3.10 We also note that the Ministers have stated two primary issues in the Bill involving the regulated time period and the cap on expenditure by third parties, is partly based on offshore third-party advertising regimes, specifically

in Canada and the United Kingdom (U.K). However, it appears the Bill has adopted the worst of both worlds. The Canadian regime has tight spending limits and the inclusion of 'issues' campaigns, but these rules only apply when the electoral campaign formally starts, which does not apply for the entire election year. The U.K regime has a year long regulatory period, but its spending limit for third parties is substantially higher than what is proposed in the Bill – 1 million pounds, or around NZ\$2.6 million, roughly 43 times the amount that is able to be spent under what is currently proposed. While Business New Zealand supports the investigation of regimes and processes when introducing or amending regulation, we would expect outcomes that 'cherry pick' the best of what other countries incur. The decisions reached by officials in regard to the current Bill do neither.

- 3.11 The other issue involves the timing of these changes. We are not examining this issue just after a general election has taken place, which would provide a three year window of opportunity for substantive public discussion and debate. Instead, the first opportunity for public debate was the introduction of the Bill itself, roughly one year before a general election. This would mean the end outcomes of the Bill, as they currently stand, take place in approximately four months time. It goes without saying that from the introduction of the Bill through to the start of the timeframe which incurs the changes represents an extremely confined space for an issue that has such far reaching implications. We do not believe there is anywhere near sufficient capacity for the Bill's problems to be completely rectified by the end of 2007.
- 3.12 Collectively, these broad issues highlight the fact that the Bill should not proceed. Instead, Business New Zealand recommends a backtrack towards a full and comprehensive consultative process with the public, involving transparency of future options and ways forward. Given the timeframes involved for a proper consultative path and the imminent arrival of the 2008 general election, we seek to delay this process until after the 2008 general election.

***Recommendation: That the Bill does not proceed, or at the very least be delayed by way of proper public consultation until after the 2008 general election to ensure it is improved upon to a satisfactory level.***

- 3.13 Notwithstanding the fact that Business New Zealand does not wish to see the Bill proceed, there are a variety of changes that need to be made to get the Bill anywhere near a satisfactory state. Given the direct effect on our organisation, Business New Zealand wishes to concentrate on the following issues in the Bill that relate to third parties.

#### **4. PARTICULARS OF THE BILL**

##### **Clause 4 – Interpretation (Regulated Period)**

- 4.1 Clause 4 of the Bill defines what is meant by a regulated period, which will be whichever is longer: the period commencing on 1 January of the year Parliament is due to expire, or the three months prior to polling day. In reality, this means the regulated period is most likely to be 1 January of an election

year till polling day, given elections in the first three months are typically rare on an historical basis. This would mean a regulated period could be 6 to 11 months in length.

- 4.2 Business New Zealand believes that this time period is far too long, and we cannot think of a viable reason why it would need to stretch out for such an extended period (in many instances being equivalent to 25% of the time period between one election day and the next if the general election were to be held in September). Restrictions for a period of time that will typically stretch well over 6 months, and more likely to close to 9-10 months is simply not warranted, and prohibits the ability for the public to engage in various conversations and debates about policies that shape New Zealand's future. Instead, Business New Zealand recommends that the current time period of three months remains.

***Recommendation: That the proposed regulated period as outlined in the Bill does not proceed, and instead the three month period remains leading up to the day of the general election.***

#### **Clause 5 – Meaning of Election Advertisement**

- 4.3 Clause 5(1)(a) of the Bill defines an 'election advertisement' as '*any form of words or graphics, or both, that can reasonable be regarded as doing one of more of the following:*

- i. Encouraging or persuading voters to vote or not to vote for one or more specified parties or one or more candidates or any combination of parties and candidates:*
- ii. Encouraging or persuading voters to vote or not to vote for a type of party or type of candidate that is described or indicated by reference to views, positions or policies that are or are not held, taken or pursued (whether or not the name of a party or candidate is stated):*
- iii. Taking a position on a proposition with which one or more parties or one or more candidates is associated.*

- 4.4 It seems that in an attempt to cover various scenarios, the definition has significantly stretched beyond what it wants to capture. From Business New Zealand's point of view, point (i) certainly does not apply directly to our organisation, nor probably does it apply to the vast majority of business advocacy groups. Unlike the views that can often be expressed by other lobby or interest groups, it is very rare for a business group to stipulate which party or candidates' voters should vote for. Advocacy groups, such as Business New Zealand, are about policy, not politics.

- 4.5 However, we believe points (ii) and (iii) certainly relate to Business New Zealand in its interpretation. An example that may relate to point (ii) could be a business group compiling and comparing the industrial relations policies of the various parties. A booklet may be produced that seeks to align the views of the political parties with its own independent stance, or may include a summary of the perceived pros and cons of the views of the parties on these issues. Such procedures are common for advocacy groups, to inform their

members (and the general public) where the political parties stand against long held views of their organisation.

- 4.6 Point (iii) provides the most significant concern to Business New Zealand. Its definition is so extremely wide ranging that it covers not only just advertising relating to an election, but any advertising relating to policy or politics in an election year, such as campaigning for or against legislation or Government policy. In turn, this would capture a vast array of what interest and advocacy groups do on a day-to-day basis.
- 4.7 It is the role (and expectation of the general public) that political parties take positions on a wide range of issues. However, the propositions put forward by political parties are often fluid, in that some proposed policies only arise for a certain time period, while others can change or be enhanced upon depending on the political landscape, which means interest groups would have to spend considerable time and effort assessing whether what they do falls under clause 5(1)(a)(iii) of the Bill.
- 4.8 The proposed length of the regulated period (which as expressed above will typically start on 1 January) will cause additional angst for groups. For instance, a political party may have a policy view on an issue at the start of the year, but is all but abandoned in terms of pushing the issue by September. Would a group or individual taking a public position then be counted as an election advertisement? The same holds if this was reversed. Business New Zealand may take a public position on a new issue that arises, which one or more political parties also takes a view on later down the regulated period. Would Business New Zealand then have to retrospectively count this as election advertising? Apart from the confusion and compliance issues this would cause, there is also the potential for gaming by political parties if they wish to circumvent particular groups discussing some issues, by raising them as a formal policy plank. Overall, point (iii) is so broad there is a strong likelihood almost all issues relating to New Zealand would be included.
- 4.9 Clause 5(2) then goes on to exclude a number of publication types from the definition. This highlights how broad the catchment of third party advertising and election expenses will be since it is not a list that actually defines what is included. The exclusion list includes among other things:
- c) *Any content of a newspaper or periodical that has been selected by, or with the authority of the editor of the newspaper or periodical solely for the purpose of informing or entertaining its readership;*
  - d) *Any content of a radio or television programme that has been selected by, or with the authority of, a broadcaster ... solely for the purpose of informing or entertaining its audience;*
  - e) *A book that is sold for no less than its commercial value, if the book was planned to be made available to the public regardless of any election;*
  - f) *A document published directly by a body corporate or unincorporated to its members; and*

- g) The publication of an individual, on a non-commercial basis, on the Internet of his or her personal political views (being the kind of publication commonly known as a blog).*

Parts (e) and (f) have the most relevance to organisations such as Business New Zealand. As an advocacy group, Business New Zealand regularly distributes a variety of communication publications in various forms that examine issues relating to a wide range of economic topics. These include media releases, business update newsletters, 'perspectives' documents, and other adhoc publications (such as the recent *OCR: The Sharpest Tool in the Box?* document). One could argue that such publications would not be excluded, as they are distributed out to both members and the general public as requested (both in terms of hard copies and available on our website), and are freely available, so would not have a commercial value.

- 4.10 Overall, clause 5 has been poorly thought out and applied by officials in terms of capturing the meaning of election advertising. In particular, clauses 5(a)(ii) and (iii) are shoddy, if not a danger to democracy and a persons or groups ability to freely express opinion(s). Therefore, Business New Zealand believes that clause 5 of the Bill requires significant amendments to reduce the scope in which election advertising is captured. A start on the path of improvement would be the significant amendment, or preferable withdrawal, of clauses 5(1)(a)(ii) and (iii) of the Bill.

***Recommendation: That clause 5(1) of the Bill is significantly amended to reduce the scope in which an election advertisement is captured.***

#### **Clauses 14-21– Listing of Third Parties**

- 4.11 Clause 14 of the Bill lists persons eligible to be a third party, which includes:

- a) A registered elector; or*
- b) A body corporate that is not an overseas person; or*
- c) An unincorporated body all of whose members are registered electors.*

- 4.12 Clause 14(1)(b) would basically include companies or incorporated societies, which would cover most business industry groups, such as Business New Zealand and our associated regions and industry groups. Clauses 6-21 outline the necessary processes one has to go through to be formally recognised as a third party, which again involves another compliance issue upon organisations and other groups have to deal with.

- 4.13 On a related issue, the Bill in its current form will not only be compliance heavy for third parties, but also Government departments who have to monitor and enforce the rules outlined in the legislation. There are a large number of advocacy/interest groups that exist in New Zealand, and certainly a wide catchment of issues under the current particulars of the Bill that could be considered election spending. The task that needs to be undertaken by officials regarding monitoring and enforcement would be substantial, especially concerning monitoring of all forms of advertising and exposure, given the broad definitions outlined in the Bill.



### *Application to the Chief Electoral Officer*

- 4.14 If one meets the criteria established in clause 14, the Bill outlines that they can seek to apply to be listed as a third party (*clause 16 – application to be listed as third party*), by way of an application to the Chief Electoral Officer, including notification of an individual who is eligible for appointment under clause 9 as the financial agent of the third party.
- 4.15 Clauses 18 and 19 stipulate that such applications can be refused on what appears to be vague grounds. For example, clause 18(1)(c) states *the name of the promoter is deemed to be offensive or likely to cause confusion or mislead voters*. While Business New Zealand would not condone names that are blatantly offensive or discriminatory, the grounds as outlined in the Bill could mean that any groups that include words in their title such as “National”, “Labour”, “NZ”, “United”, “Future”, “Green” or “Maori” could easily fall under the auspicious of misleading voters, because of the connotations with a political party. One could argue that most (if not all) of these words already has considerable use amongst groups that would have to apply as third parties.
- 4.16 If a groups’ application is refused, they would have to change their name to comply, which in many cases would be an onerous compliance cost, which would effectively be for a 6-11 month period if they wish to revert back to their original name that they may have been known as for many years. This has severe branding and marketing issues, not to mention causing confusion about what messages are coming from whom.
- 4.17 Also, there are often groups that are formed relating to a particular issue that do not have names that are outwardly offensive, but are direct and point to the issue at hand. For example, a group may be called “Fix Wellington Now”. As the Chief Electoral Officer has the power with which to refuse a promoter, they may view this name to be offensive as it in some way it negatively affects the current status of Wellington in a pessimistic tone. Again, a forced name change would mean further compliance headaches for the group in question.
- 4.18 Overall, the current wording of the Bill provides too much leeway to the Chief Electoral Officer in terms of determining refusal of a third party regarding their application to be listed. As a start, Business New Zealand believes one positive way to raise the bar is to significantly amend Clause 18(1)(c), which otherwise could open a Pandora’s box of problems.

***Recommendation: That clauses 18(1)(c)(i) and (ii) of the Bill is amended to provide a clearly notion of what is deemed to be offensive and/or likely to cause confusion.***

### **Clause 53 – Election Advertisements not to be Published in Regulated Period unless Certain Conditions Met**

- 4.19 Clause 53 of the Bill provides the opportunity for promoters, who sign a statutory declaration that they will not spend more than \$5,000 on expenses incurred in respect of all election advertisements will not have to be formally

registered as a third party. While this may have been introduced to minimise the compliance effect on individuals or very small groups, the implication of this is still significantly objectionable. In essence, they are declaring that they will not spend more than \$5,000 for expressing any form of political opinion over what would typically be an extended period of time. In many instances, this could be very difficult. Given the timeframe that in all likelihood would extend back to 1 January of an election year, a group may apply for the provision of a declaration, but find that in six months time an issue arises as part of the election campaigning process that they need to engage the public on, but are tied with the \$5,000 spending cap.

- 4.20 Apart from the monetary cap, there is another potentially large fishhook between the requirements of a registered third party, and an organisation that intends to spend up to \$60,000 and is not incorporated. To be eligible as a third party, all members of an unincorporated body must be registered electors. Therefore, if there is an unincorporated body with at least one 17 year old (or younger) member, they must not be able to register as a third party. If that is the case, then the maximum amount that can be spent significantly reduces from \$60,000 for the regulated period to \$5,000.
- 4.21 This rule defies common sense. While it would be fairly uncommon for business organisations to be unincorporated, there would be many other organisations and interest groups that would be unincorporated, and certainly have one or more younger members, for example those relating to specific youth issues. The fact that there could be one member out of an organisation of literally thousands should not cause an organisation to have to conform to the \$5,000, rather than the \$60,000 cap. In reality, it would be questionable whether various groups would actually adhere to these stipulations, due to the even more severe limitations on expenditure, not to mention the onerous compliance implications. As stated in 4.12 above, the monitoring by officials would also be a relative administrative nightmare.
- 4.22 Lastly, not all organisations have detailed information about their members that include their age (due to standard collection of information, privacy issues etc). Organisations that have a broad membership may inadvertently be breaking the rules with one or more members below voting age, even though they may be taking all possible steps in an attempt to comply.

***Recommendation: That the particulars involving those who sign a statutory declaration involving a \$5,000 limit be significantly revised.***

#### **Clauses 99-118 – Third Party Election Expenses**

- 4.23 Clause 99 of the Bill defines that a third party election activity including activity undertaken by or on behalf of the third party or its financial agent that comprises the publication of an election advertisement in any form (e.g., radio, TV broadcast, notice, poster, pamphlet, billboard, or electronic message) during the regulated period. Clause 100 defines election expenses as the costs of preparation, design, composition, printing, distribution, postage, and publication of an election advertisement, the costs of any material used or applied for an election advertisement, and the cost of

displaying and election advertisement on any advertising space on any land or building used solely or principally for commercial or industrial purposes.

- 4.24 While both clauses 99 and 100 provide interpretations of election expenses that are generally broad, Clause 100(2) then goes on to exclude the costs of travel, the conduct of any survey or public opinion poll, labour that is provided free of charge, and the replacement of material that is destroyed or rendered unusable by persons or circumstances beyond the control of the third party. While Business New Zealand believes that clause 100(2) would help mitigate to a very minor extent the concerns in terms of expenses incurred by advocacy and interest groups, these exemptions are really a small proportion of expenses typically outlaid, which would mean the \$60,000 cap would undoubtedly be easily breached in many instances.

### **Clause 103 – Maximum Amount of Third Party’s Total Election Expenses**

- 4.25 Clause 103 stipulates that total election expenses of a third party in respect of any regulated period must not exceed \$60,000. Business New Zealand believes this amount for a registered third party group is extremely small, especially for larger advocacy groups that could easily fall under the definition of a third party.
- 4.26 As an example, Business New Zealand typically runs a one-day general election function, approximately 2 months before the date of the general election usually held in Wellington. The function is attended by representatives of the main political parties, by members of Business NZ, as well as various forms of media and invited guests. The function provides the opportunity for in-depth discussion of policies stances by political parties, as well as the chance for audience questions. Typically, total cost of the function (which includes among other things hirage of a venue, labour costs, catering, advertising etc) would come to around 50-70% of the total funds allocated under the \$60,000 limit.
- 4.27 For other organisations or groups, a \$60,000 spending limit for the majority of the year would also significantly hamper standard operations as the limit is so low for such a long time period. For instance, a full page advertisement in the New Zealand Herald during a working week costs approximately \$35,000, meaning the \$60,000 limit would not even cover two full page advertisements.
- 4.28 In addition, Business New Zealand also regularly publishes ‘think piece’ booklets, such as our *Perspectives* series, as well as one-off publications. Because these publications always involve issues of economic policy, they will typically set the scene of what has occurred in New Zealand, and will provide recommendations for a way forward. All recommendations that Business New Zealand comes to are done so independently, and after consultation with our wide membership base. Invariably, there will be instances where discussion or recommendations outlined by Business NZ in our publications will align with the views of one or more political parties.
- 4.29 In no way would Business New Zealand consider these publications to be classified as third party advertising. They are non-partisan, and involve

conclusions and recommendations reached by consensus of Business New Zealand's family. However, under the definition of third party advertising, there is every chance they would be, and the costs associated with these initiatives would breach the current rules as stipulated in the Bill.

- 4.30 However, for arguments sake, say there was just one publication that would be clearly defined as third party advertising. This, along with an election conference would likely take Business New Zealand well over the allocated \$60,000 limit. The implication of this is that it would provide no funds for any other publications, seminars, discussion pieces etc that we would usually run in the general day-to-day activities of our organisation. Therefore, the spending limits for a registered third party need to be substantially raised, so as to avoid organisations such as Business New Zealand being severely curtailed in what we typically do as part of our day-to-day business.

***Recommendation: That the maximum amount of third party's total election expenses be significantly raised beyond the \$60,000 as stipulated in the Bill.***

#### **Clause 121 – Power to Issue Warrants in Respect of Illegal Practice**

- 4.31 Clause 121 provides the opportunity for search warrants to be issued in respect of an illegal practice that constitutes an offence under the Act that has been committed, is suspected to have been committed, or is believed to be intended to be committed. While one would hope that use of such action would only occur in exceptional circumstances, we find the possibility of search warrants being issued for such a purpose to be fairly draconian in most instances, and we would want to ensure that the power to issue such warrants in respect of any perceived illegal practice to have a very high threshold.

***Recommendation: That the power to issue warrants in respect of illegal practise has a very high threshold.***

## **5. CONCLUSIONS**

- 5.1 While there is certainly scope for more transparency concerning the election fund process, we believe the proposed Bill has not adequately addressed issues relating to third party advertising, or indeed from comments made by others has improved upon other areas that the Bill seeks to address. This is symptomatic of following a poor regulatory process, and we would not oppose any moves to effectively start again with a clean sheet. Justice Minister Mark Burton stated in parliament that the Government was “*seeking to encourage full and open expression from a diverse range of interests in the run-up to the general election*”. We believe that that goal as far as third party proposes currently stand is merely a dream, rather than reality.

## **APPENDIX**

### **6. About Business New Zealand**

- 6.1 Encompassing four regional business organisations (Employers' & Manufacturers' Association (Northern), Employers' & Manufacturers' Association (Central), Canterbury Employers' Chamber of Commerce, and the Otago-Southland Employers' Association), Business New Zealand is New Zealand's largest business advocacy body. Together with its 67-member Affiliated Industries Group (AIG), which comprises most of New Zealand's national industry associations, Business New Zealand is able to tap into the views of over 76,000 employers and businesses, ranging from the smallest to the largest and reflecting the make-up of the New Zealand economy.
- 6.2 In addition to advocacy on behalf of enterprise, Business New Zealand contributes to Governmental and tripartite working parties and international bodies including the ILO, the International Organisation of Employers and the Business and Industry Advisory Council to the OECD.
- 6.3 Business New Zealand's key goal is the implementation of policies that would see New Zealand retain a first world national income and regain a place in the top ten of the OECD (a high comparative OECD growth ranking is the most robust indicator of a country's ability to deliver quality health, education, superannuation and other social services). It is widely acknowledged that consistent, sustainable growth well in excess of 4% per capita per year would be required to achieve this goal in the medium term.