

To the Ministry of Justice
Wellington
By email: electoral@justice.govt.nz.

Greetings,

Draft Code of Conduct – Good practice expectations for lobbyists

This letter serves as BusinessNZ's submission on the Draft Code of Conduct. The submission is supported by the Employers and Manufacturers Association (EMA).

Advocacy is a major part of our work and, as such, we regularly attend meetings with Ministers and officials for the purpose of attempting to influence government policy decisions on behalf of business. We also frequently make written submissions to government, both in response to consultations and proactively.

Our belief about our advocacy activities is that they should be open and transparent. Accordingly, our website includes regular updates on our advocacy activities and planned activities. Copies of our submissions are also posted on the website, and the names of all our corporate members and associated industry groups are shown. In addition, our media releases are published on the site.

Further, we welcome details of our meetings with Ministers being released. We also respond positively when government departments and agencies that have received OIA requests ask us if we have any objection to the release of information about our participation in meetings that are in-scope of the requests.

Against this background, we are pleased to note the progress that has been made in developing a code of conduct for lobbyists. We welcome the fact that it is intended to be applied to anyone trying to influence government policy, process or law. We also welcome its emphasis on supporting fair access to public officials for all members of the public. And, most specially, we welcome its emphasis on the importance of practising transparency for the purpose of building public trust.

Lastly, we note that the code is designed as a self-regulated voluntary code that does not require sign-up. This fits with our belief that formal regulation should be avoided as far as possible and that, if it is necessary, it should not be burdensome. Nonetheless, we accept that a less voluntary approach might be necessary, if monitoring demonstrates that a voluntary approach is not achieving fairness and transparency.



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