Submission by

BusinessNZ

GROWING PROSPERITY AND POTENTIAL

to the

Ministry of Transport

on

Consultation on Driving Change: Reviewing the Road User Charges System

April 2022

CONSULTATION ON DRIVING CHANGE: REVIEWING THE ROAD USER CHARGES (RUC) SYSTEM
SUBMISSION BY BUSINESSNZ[1]

1.0 EXECUTIVE SUMMARY

1.1 BusinessNZ welcomes the opportunity to comment on *Consulting on Driving Change: Reviewing the Road User Charges System*" (the Consultation Document).

1.2 The Consultation Document's key topics include how:

- RUC might be used to charge for greenhouse gas emissions and other factors beyond damage to the roads (such as noise pollution and congestion)
- Light Electric Vehicle (EV) owners can transition into paying RUCs when the EV exemption ends in March 2024; and
- The RUC's compliance regime can be improved.

1.3 Given the diversity of BusinessNZ membership, some members and sectors will have specific issues they wish to comment on in more detail. Therefore, we have encouraged individual members and sector representatives to make their own submissions raising issues specific to their areas of interest.

1.4 While the Consultation Document addresses several matters of concern, BusinessNZ's comment is largely restricted to one of the document's central themes - how RUCs might be used to charge for greenhouse gas emissions and to factors (externalities) beyond road damage, for example, noise, pollution, accidents, and congestion.

1.5 BusinessNZ is seriously concerned about the use of RUCs as a de facto mechanism for achieving Government objectives, such as promoting greater use of EVs to lower greenhouse gas emissions. The net impact is likely to be less money available for spending on roads as different transport modes are cross-subsidised by petrol- and diesel-powered vehicles. Second, many so-called externalities associated with on-road transport - greenhouse gas emissions and accidents for example - are respectively already covered by the Emissions Trading Scheme (ETS) and by accident compensation (funded by the

[1] Background information on BusinessNZ is attached as Appendix 2.

Motor Vehicle Account via petrol levies, Motor Vehicle Registration levies and vehicle insurance levies).

1.6 There have already been recent media reports of a $350 million shortfall in National Land Transport revenue arising from COVID-related public health measures and their impacts on both fuel consumption (affecting Fuel Excise Duty (FED) revenue) and ability to travel (affecting RUC revenue). While this may prove less of an issue over time, it is a factor that does put at risk the future of some projects under the National Land transport Programme.

1.7 BusinessNZ remains mystified that the Consultation Document starts off lauding RUC as *"world-leading as a distance and weight-based charge for both diesel and heavy vehicles"* before then suggesting that RUC be fundamentally changed to a less effective behaviour change catalyst that can somehow recover the costs of damage to roads while also addressing other issues with little relation to distance travelled or vehicle weight.

1.8 It is noted that the Government has provided a significant subsidy to buyers of new EVs (just under $9,000) to encourage EV take-up. While not commenting specifically on the merits or otherwise of that policy decision (although BusinessNZ has commented in recent submissions that the ETS should be the primary means of encouraging emissions reduction), at least the costs of making the decision are transparent and can be analysed alongside other areas of government expenditure.

1.9 It is also noted that last year's Budget (May 2021) established that from this year, any proceeds from the ETS will be hypothecated to emissions reductions: the Climate Change Minister James Shaw estimated that recycling of ETS revenues could amount to more than $3 billion of investment over the next five years to help meet emissions reductions goals. Again, if the Government is determined to subsidise low carbon emission fuels or technologies, then this ETS fund would seem more appropriate (like general taxation) to fund these initiatives, without using the RUC mechanism which is targeted specifically at the cost of vehicle wear and tear on the roading network.

RECOMMENDATIONS

BusinessNZ **recommends** that:

As greenhouse gas emissions are already covered under the ETS, there is no justification for imposing additional costs on existing road users to promote the greater use of non-petrol or diesel-fuelled vehicles (such as EVs). This is explicitly acknowledged in the Consultation Document *"[Greenhouse gas emissions] are already addressed through the ETS which is included in the price of all transport fuels so accounting for them in RUC rates would duplicate costs" (p.25).*

BusinessNZ **recommends** that:

When it comes to meeting our domestic and international obligations to reach net zero carbon emissions by 2050, the focus should be on:

- **Net emissions and not gross emissions**
- **The ETS as the sole tool except where it can be clearly demonstrated that further interventions will have net benefits**
- **Supporting policies that are outcome-focused and technology-agnostic**
- **Avoiding bans and interventions which typically increase cost for no gain given the ETS cap**
- **Lowest cost abatement, as cost is important to the wellbeing and livelihood of New Zealand families and businesses.**

BusinessNZ **recommends** that:

If, after a thorough review of the RUC system, in the Government's opinion there is a sound public policy reason for the continued cross-subsidisation of any new or existing road users e.g., EV owners (although no obvious reason occurs to BusinessNZ), the nature of the subsidisation should be made transparent, and funding provided from general taxation. The funding will then show clearly in the government accounts, allowing the quality of the expenditure to be judged alongside all other areas of government expenditure.

BusinessNZ **recommends** that:

As greenhouse gas emissions from on-road activity are covered under the ETS, and the impacts of other on-road activity, including noise, pollution etc, are covered by RMA, additional mechanisms to minimise environmental effects are unnecessary and should not be introduced. Rigorous and specific requirements are already imposed on roading infrastructure and any additional requirements would potentially damage New Zealand's ability to build much-needed infrastructure.

BusinessNZ **recommends** that:

Neither an RUC system nor any other mechanism should impose costs in addition to those currently associated with on-road accidents and injuries. Given the ACC scheme (via the ACC Motor Vehicle Account) currently fully funds road injury costs there is no justification for imposing further costs. Even then, the Motor Vehicle Account includes significant cross-subsidisation of road users; motor vehicle owners continue to pay a disproportionate share of the costs arising from motorcycle accidents, while users of other modes of transport (such as cyclists) pay nothing towards road accident costs.

BusinessNZ **recommends** that:

Despite the economic merits of congestion charging as a concept, it is extremely unlikely that it could be satisfactorily included in an RUC system since congestion is generally relatively site-specific, and perhaps more importantly, time-specific. Consequently, a flat RUC system across the country would not, for example, be appropriate.

2.0 DISCUSSION

2.1 Land transport funding in New Zealand ensures that funds generated through fuel excise duty, road user charges and motor vehicle licensing fees are progressively retained for land transport initiatives i.e. are effectively hypothecated taxes. The underlying theme is the importance of retaining competitive neutrality between the different modes of transport.

2.2 BusinessNZ accepts demand management tools such as congestion pricing and tolls will in some cases be both necessary and desirable but considers it is important to understand clearly the rationale for their use. The RUC system is not an appropriate mechanism for dealing with many of the so-called "costs" the Consultation Paper identifies, as these are adequately covered by levies and taxes already in place.

2.3 The current RUC system has been world-leading for a number of decades with a clear objective of internalising the costs associated with using different vehicle types (weight/length etc.) sheeted home to the users of the roading network. The system therefore has a clearly defined objective and undermining that objective by adding on various other charges would seriously damage the system's integrity. Notwithstanding, it is entirely appropriate to review the RUC system from time to time to take account of the different modes of transport using the roading network, ensuring the costs imposed on the network are adequately considered (for example, from the greater use of EVs).

2.4 As a general principle, individuals and companies should bear the full cost of their behaviour (i.e. costs should be internalised) as there will be an over-consumption of resources if costs can be shifted on to third parties. If rational decisions are to be made about motor vehicle use, those involved should ideally bear the costs (and receive the benefits) associated with specific options/outcomes.

2.5 Imposing costs over and above those which individuals and firms ought to bear will result in a misallocation of resources. Costs will rise and individuals will either pay higher prices for goods and services than they otherwise would, or the choice of goods and services available will be inhibited. With roading, if road users do not pay their fair share of the costs imposed on the roading network, the result is likely to be less revenue for crucial roading infrastructure.

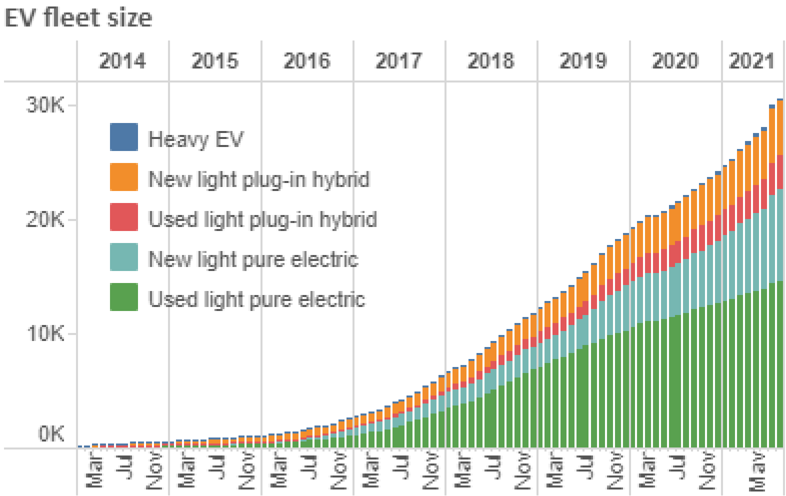
2.6 There have already been recent media reports of a $350 million shortfall in National Land Transport revenue arising from COVID-related public health measures and their impacts on fuel consumption (affecting Fuel Excise Duty

(FED) revenue) and ability to travel (affecting RUC revenue). While this may prove less of an issue over time, it is currently a factor that poses risk to a number of projects under the National Land Transport Programme.

2.7 BusinessNZ notes the Consultation Document outlines some important risks arising from changing the purpose of RUCs (p.24-26) which we strongly agree with. These risks include:

- A lack of information on how important the existing RUC exemptions have been in promoting EV uptake, or on the effect exemptions or discounts would have in supporting the uptake of other low-carbon fuels
- RUC exemptions and reduced RUC rates undermining the key principle of the RUC system; that vehicle owners should pay for the use of roads including pavement damage. Exemptions and rate reductions would reduce incentives to choose vehicle combinations that minimise damage to the road network
- Discounts or exemptions undermining the principle of the RUC system referred to above: that vehicle owners should pay for their road use. Discounts and exemptions would likely lead to a decline in funds available for building and maintaining transport infrastructure (given the additional costs on other road users to offset the expected revenue loss). The probable result would be deferred, or at a minimum delayed, investment in transport infrastructure
- Duplication of costs as greenhouse gas emissions are already covered under the ETS. *"[Greenhouse gas emissions of fuels] …. are already addressed through the ETS which is included in the price of all transport fuels so accounting for them in RUC rates would duplicate costs."*

2.8 Modes of transport are changing in NZ as in other countries. It is, for example, understood that there are around 30,000 EVs registered here, and while still a minuscule proportion of the cars on road (likely to be only around 1 percent of on-road vehicles), this number is increasing all the time in step with changing consumer habits, as can be seen from the table below.



2.9 Given the above, it is important that users of the roading network reflect the costs associated with the different modes of transport, particularly those that do not require registration, or use petrol/diesel, or are not covered through the current RUC system. RUCs and other funds from some road users are already used to fund potentially questionable projects which are of little or no benefit to those currently paying for roading costs.

Greenhouse gases

2.10 BusinessNZ is seriously concerned at the use of RUCs as a de facto mechanism for achieving government objectives such as promoting greater use of EVs to lower greenhouse gas emissions. The net impact is likely to be less money available for spending on roads as different transport modes are cross-subsidised by petrol- and diesel-powered vehicles. And many of the so-called externalities associated with on road transport, such as greenhouse gas emissions are already covered through mechanisms, such as the ETS.

2.11 Provided emissions are adequately covered by the ETS, authorities should be agnostic as to which specific projects (or transport modes) are supported.

2.12 BusinessNZ considers that if government decides, for some rigorously determined public policy reason (although BusinessNZ cannot think of one), that specific road users e.g. EVs or any other road users should be subsidised by other motor vehicle owners, the subsidy should be transparent, funded out of general taxation and explicitly recognised in the government accounts, as is currently government (taxpayer-funded) assistance to low income earners and the elderly (via NZ Superannuation payments) etc. This is consistent with BusinessNZ's submission on the ACC Levy Review 2022-24 in respect to the ACC Motor Vehicle Account's current subsidisation of motorcyclists.

2.13 It is noted that the Government has provided a significant subsidy to buyers of new EVs (just under $9,000) to encourage EV take-up. While not commenting specifically on the merits or otherwise of that policy decision (although BusinessNZ has commented in recent submissions that the ETS should be the primary means of encouraging emissions reduction), at least the costs of making the decision are transparent and can be analysed alongside other areas of government expenditure.[2]

2.14 It is also noted that in last years Budget (May 2021) that from this year, any proceeds from the ETS will be hypothecated to emissions reductions with the Climate Change Minister James Shaw estimating that recycling of ETS revenues could amount to more than $3 billion of investment over the next five years to help meet emissions reductions goals. Again, if the Government is determined to subsidise particular vehicle types, then this ETS fund would seem more appropriate (like general taxation) to fund these initiatives, without using the RUC mechanism which is targeted specifically at the cost of vehicle wear and tear on the roading network.

2.15 Irrespective of government's explicit decision to subsidise the take up of EVs, BusinessNZ is strongly of the view that it is inappropriate for vehicles with similar risk profiles not to be charged levy rates in accordance with those charged to all other road users.

BusinessNZ **<u>recommends</u>** that:

As greenhouse gas emissions are already covered under the ETS, there is no justification for imposing additional costs on existing road users to promote the greater use of non-petrol or diesel-fuelled vehicles (such as EVs). This is explicitly acknowledged in the Consultation Document *"[Greenhouse gas emissions] …. are already addressed through the ETS which is included in the price of all transport fuels so accounting for them in RUC rates would duplicate costs" (p.25).*

[2] See for example, BusinessNZ Submission to the Environment Select Committee on the Natural and Built Environments Bill (August 2021).
"Provided emissions are adequately covered by the ETS, authorities should be agnostic as to which specific projects should be supported. Therefore, when it comes to meeting domestic and international obligations to reach net zero carbon emissions by 2050, we consider the focus should be on:
1. *Net emissions and not gross emissions*
2. *The ETS as the sole tool except where it can be clearly demonstrated that further interventions will have net benefits*
3. *Any supporting policies as outcome-focused and technology agnostic*
4. *Avoiding bans and interventions as typically these increase cost for no gain, given the ETS cap*
5. *The importance of lowest cost abatement as cost matters to the wellbeing and livelihood of New Zealand families and businesses."*

BusinessNZ **recommends** that:

When it comes to meeting our domestic and international obligations to reach net zero carbon emissions by 2050, the focus should be on:

- **Net emissions and not gross emissions**
- **The ETS as the sole tool except where it can be clearly demonstrated that further interventions will have net benefits**
- **Any supporting policies should be outcome focused and technology agnostic**
- **Bans and interventions should be avoided as typically they increase cost for no gain given the ETS cap**
- **The importance of lowest cost abatement as cost matters to the wellbeing and livelihood of New Zealand families and businesses.**

BusinessNZ **recommends** that:

If, after a thorough review of the RUC system, in government's opinion there is a sound public policy reason for the continued cross-subsidisation of any new or existing road users e.g., EV owners (although no obvious reason occurs to BusinessNZ), the nature of the subsidisation should be made transparent, and funding provided from general taxation. The funding will then show clearly in the government accounts, allowing the quality of the expenditure to be judged alongside all other areas of government expenditure.

Other Pollution

2.16 In respect to pollution, BusinessNZ is supportive of a range of mechanisms for improving the pricing signals to consumers, households, businesses and road users about the true costs associated with pollution but notes that given the nature of the roading network and levels of use in different parts of the country, dealing with various forms of pollution and/or waste is complex and goes well beyond simply saying "all pollution is bad and less pollution is better."

2.17 ETS requirements notwithstanding, the impact of roading activity, including noise, pollution etc must also go through a normal Resource Management Act (RMA) process. This often means rigorous and specific requirements are imposed on roading infrastructure with additional mechanisms to minimise effects on the environment. Examples include rigorous consenting requirements that led to significant delays in opening the Transmission Gully highway out of Wellington.

BusinessNZ **recommends** that:

As greenhouse gas emissions from on-road activity are covered under the ETS, and the impacts of other on-road activity, including noise, pollution etc, are covered by RMA, additional mechanisms to minimise environmental effects are unnecessary and should not be introduced. Rigorous and specific requirements are already imposed on roading infrastructure and any additional requirements would potentially damage New Zealand's ability to build much-needed infrastructure.

Accident Costs

2.18 There is no justification for imposing additional costs via RUC or any other mechanism on accidents and injuries on the road, given the ACC scheme (via the ACC Motor Vehicle Account) currently fully-funds costs associated with road injuries. Additional costs via RUC or any other mechanism would represent an unjustified tax and would distort the true costs associated with accidents in NZ as there is a specific requirement current under ACC law for the Motor Vehicle Account (alongside the Work and Earners Account) to be fully-funded.

2.19 BusinessNZ has continuing concerns about the significant degree of cross-subsidisation in the Motor Vehicle Account, particularly in respect to motorcyclists who, as a group, continue to be heavily subsidised by motor vehicle owners. Other modes of transport, e.g., cycling, are not included within the ACC levy framework while other transport modes, e.g. EVs, which do not pay petrol charges, are in effect subsidised by other road users. Greater equity in funding the Motor Vehicle Account is required for existing and potential road users in view of an increasing move to new transport modes, including cycling and other means of transport not using petrol (or diesel), e.g., electric scooters.[3]

BusinessNZ **recommends** that:

Neither the RUC system nor any other mechanism should impose costs in addition to those currently associated with on-road accidents and injuries. Given the ACC scheme (via the ACC Motor Vehicle Account) currently fully-funds road injury costs there is no justification for imposing further costs. Even then, the Motor Vehicle Account includes significant cross-subsidisation of road users; motor vehicle owners continue to pay a disproportionate share of the costs

See Appendix 1 for relevant section on the Motor Vehicle Account from BusinessNZ's Submission to ACC on the 2021 Levy Consultation: Proposed Levy Rates 2022-25 (October 2021)

arising from motorcycle accidents, while users of other modes of transport (such as cyclists) pay nothing towards road accident costs.

Congestion Pricing

2.20 Market economic theory, which encompasses the congestion pricing concept, believes road users should be forced to pay for the negative externalities they create making them conscious of the costs they impose upon each other when consuming during peak demand. But congestion pricing is not, as such, a mechanism that should necessarily be used to pay for new roads. This has been one of the main concerns of road users and taxpayers around the world about the use of congestion charging regimes. Moreover, despite the economic merits of congestion charging as a concept, it is extremely difficult to know how it could be appropriately included within a RUC scheme. Congestion charging generally is relatively site specific, and perhaps more importantly, time specific. A flat road use congestion charge across the country would not, therefore be appropriate.

BusinessNZ **recommends** that:

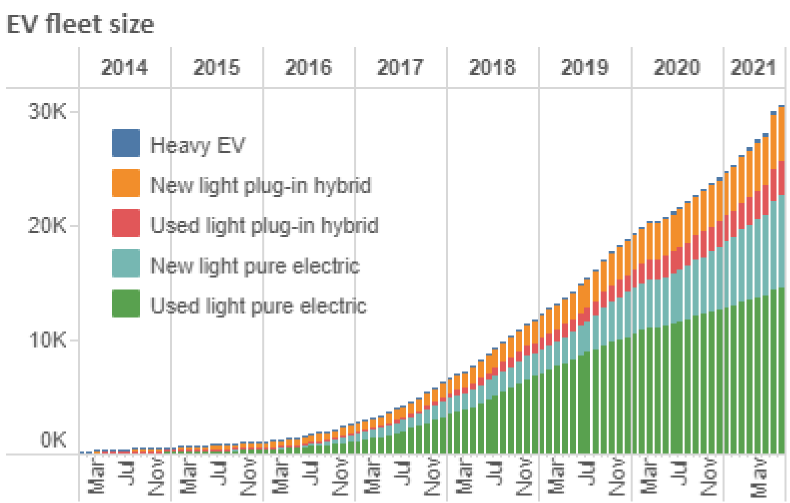
Despite the economic merits of congestion charging as a concept, it is extremely unlikely that it could be satisfactorily included in the RUC system since congestion is generally relatively site-specific, and perhaps more importantly, time-specific. Consequently, a flat RUC system across the country would not be appropriate.

<u>Appendix 1 - Relevant section from BusinessNZ's Submission to ACC on the proposed ACC levy rates to apply from 2022-24 (BusinessNZ October 2021)</u>

"6.0 <u>CROSS-SUBSIDISATION (IN RESPECT TO THE MOTOR VEHICLE ACCOUNT)</u>

6.1 BusinessNZ has continuing concerns about the significant degree of cross-subsidisation in the Motor Vehicle Account, particularly in respect to motorcyclists who, as a group, continue to be heavily subsidised by motor vehicle owners, as noted in the consultation documents. Other modes of transport, e.g., cycling, are not included within the ACC levy framework while other transport modes, e.g. Electric Vehicles are in effect subsidised by other road users given they do not pay petrol charges. Greater equity in funding the Motor Vehicle Account is required for existing and potential road users in view of an increasing move to new transport modes, including cycling and other means of transport not using petrol (or diesel), e.g., electric scooters.

6.2 Modes of transport are changing in NZ as in other countries. It is, for example, understood that there are around 30,000 Electric Vehicles registered in NZ, and while still a minuscule portion of the cars on road (likely to be only around 1 percent of on road vehicles), this number is increasing all the time in step with changing consumer habits, as can be seen from the table below.



6.3 Given the above, it is important ACC premiums reflect the risks associated with different modes of transport, particularly those that do not require registration or use petrol/diesel.

6.4 *There have been moves over the past few years to reduce Motor Vehicle Account cross-subsidisation but these have been tentative to say the least, focusing mainly on removing some of the distortions within each vehicle class (e.g., between small and large motorcycles) rather than dealing with motorists' cross-subsidisation of motorcyclists per se. This process has effectively continued during the current 2022-25 levy consultation round.*

6.5 *There will be motorcycle owners (and other road users, e.g., owners of EVs) who can readily afford to pay the risk-rated premium associated with motor cycling, while there will be car owners who struggle to pay the ACC licensing fee whether they be EV owners or not.*

6.6 *It is not clear from any research that BusinessNZ is aware of, that motorcyclists or owners of EVs, on average, have any more or less ability to pay than other road users, or indeed professional rugby players, in respect to risk-based work levies.*

6.7 *ACC, correctly in BusinessNZ's opinion, risk-rates activities in the Work Account based on actual risk (not fault, as ACC is a no-fault scheme). This means a professional rugby player will pay significant ACC levies for ACC-related claims, given the relatively higher risk of injury to professional rugby players compared with individuals working in less risky environments, e.g., office workers.*

6.8 *It has sometimes also been argued that cross-subsidisation is justified because the motorcyclist is often not "at fault" in an accident involving a motorcycle, that is, does not cause the accident.*

6.9 *In response, the following should be noted:*

- *The "no fault" aspect of the scheme is simply government policy, providing cover for all accidents regardless of fault, with injured persons entitled to compensation without legal recourse.*
- *ACC is attempting to recoup the costs of the scheme from those whose costs are greatest (have the highest accident costs), irrespective of fault.*
- *Motorcycle riders (no external protection, no seatbelt, higher risk of not being seen by motor vehicles when overtaking etc.) are more prone to serious bodily injury than are people in cars. Injuries sustained by motorcyclists are likely to be more extensive whether the collision involves a motorcycle alone or is with another vehicle. Thus, regardless of who is at fault, riding a motorcycle, on average, results in a higher accident cost.*

6.10 *While the levy applying to actual claims' costs would be relatively high (relative to current subsidised rates), BusinessNZ nevertheless considers rates should be more progressively based on risk. However, it is acknowledged that it might take several years to achieve true risk-based levies for motorcycle owners.*

6.11 *Individuals considered in need of taxpayer assistance (generally income-related) receive support via various tax measures, including income support to enable them to purchase essential goods and services.*

6.12 *If government decides, for some rigorously determined public policy reason (although BusinessNZ cannot think of one), that motorcyclists, or any other road users (e.g., cyclists, Electric Vehicle owners etc) should be subsidised by other motor vehicle owners, the subsidy should be transparent, funded out of general taxation and explicitly recognised in the government accounts, as is currently government (taxpayer-funded) assistance to low income earners and the elderly (via NZ Superannuation payments) etc.*

6.13 *In respect to Electric Vehicles, it is noted that the Government has provided a significant subsidy to buyers of new EVs (just under $9,000) to encourage EV take-up. While not commenting specifically on the merits or otherwise of that policy decision (although BusinessNZ has commented in recent submissions that the Emissions Trading Scheme (ETS) should be the primary factor to encourage emission reductions), at least the costs of making this decision are transparent and can be analysed alongside other areas of government expenditure.*[4]

6.14 *Irrespective of Government's explicit decision to subsidise the take up of EVs, BusinessNZ is strongly of the view that it is inappropriate for vehicles with similar risk profiles not to be charged levy rates similar to those charged to all other road users. Again, if the Government sees fit to subsidise the use/uptake of EVs then this should be done in a transparent and open manner, rather than other road users paying for what will, over time, become a bigger accident cost, given the expected continuing growth in EV use.*

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[4] See for example, BusinessNZ Submission to the Environment Select Committee on the Natural ad Built Environments Bill (August 2021).
"Provided emissions are adequately covered by the ETS, authorities should be agnostic as to which specific projects should be supported. Therefore, when it comes to meeting domestic and international obligations to reach net zero carbon emissions by 2050, we consider the focus should be on:

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4. *Avoiding bans and interventions as typically these increase cost for no gain, given the ETS cap*
5. *The importance of lowest cost abatement as cost matters to the wellbeing and livelihood of New Zealand families and businesses."*

BusinessNZ ***recommends*** *that:*

1. ***A thorough investigation of Motor Vehicle Account funding be carried out to enable associated costs to be more closely sheeted home to claimants, based on risk, not vehicle type or transport mode.***

BusinessNZ ***recommends*** *that:*

2. ***If, after a thorough review of the Motor Vehicle Account, in the opinion of the ACC Board and the Government there is a sound public policy reason for the continued cross-subsidisation of motorcyclists or any other new or existing road users e.g., EV owners (although no obvious reason occurs to BusinessNZ), the nature of the subsidisation be made transparent, and funding provided from general taxation. The funding will then show clearly in the government accounts, allowing the quality of the expenditure to be judged alongside all other areas of government expenditure."***

Appendix 2 - Background information on BusinessNZ

BusinessNZ

GROWING PROSPERITY AND POTENTIAL

BusinessNZ is New Zealand's largest business advocacy body, representing:

- Regional business groups EMA, Business Central, Canterbury Employers' Chamber of Commerce, and Employers Otago Southland
- Major Companies Group of New Zealand's largest businesses
- Gold Group of medium sized businesses
- Affiliated Industries Group of national industry associations
- ExportNZ representing New Zealand exporting enterprises
- ManufacturingNZ representing New Zealand manufacturing enterprises
- Sustainable Business Council of enterprises leading sustainable business practice
- BusinessNZ Energy Council of enterprises leading sustainable energy production and use
- Buy NZ Made representing producers, retailers and consumers of New Zealand-made goods

BusinessNZ 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.

In addition to advocacy and services for enterprise, BusinessNZ contributes to Government, tripartite working parties and international bodies including the International Labour Organisation (ILO), the International Organisation of Employers (IOE) and the Business and Industry Advisory Council (BIAC) to the Organisation for Economic Cooperation and Development (OECD)