

Submission by



to the

Ministry for the Environment

on the

**Proposed priority products and priority product
stewardship scheme guidelines Consultation Document**

October 2019

**PROPOSED PRIORITY PRODUCTS AND PRIORITY PRODUCT
STEWARDSHIP SCHEME GUIDELINES CONSULTATION DOCUMENT
SUBMISSION BY BUSINESSNZ¹**

1.1 INTRODUCTION

- 1.2 BusinessNZ welcomes the opportunity to comment on the Proposed Priority Products and Priority Product Stewardship Scheme Guidelines Consultation Document ("the Consultation Document").
- 1.3 BusinessNZ acknowledges the objective set out in the Executive Summary's first paragraph, namely that: *The Government wants New Zealand to have a productive, sustainable, inclusive and low emissions economy. The aim is for a more prosperous and fairer society, and economic growth within environmental limits. Part of this process is designing waste out of the system by transitioning from a linear 'throw-away culture' (take-make-dispose) to a circular economy (make-use-return).* (p.7)
- 1.4 The above statement is one the broader business community, suppliers and consumers increasingly aspire to. As the page 3 message from the Associate Minister for the Environment states: *"Over the first 10 years of the Waste Minimisation Act 2008 (WMA), we have seen exemplary efforts by industry and community leaders to minimise waste within a completely voluntary framework".* Industry and others have made a huge effort to look seriously at how their businesses impact on the waste stream and have learnt how changing practices can result in significant environmental gains.
- 1.5 Product stewardship needs to be considered in the context of a circular economy rather than the traditional linear 'take-make-dispose' model. This paradigm shift is gaining traction not only in New Zealand, but increasingly world-wide as resource constraints start to impact on behaviour, along with changing consumer demands.
- 1.6 Waste policy in New Zealand and around the world is coming under increased scrutiny. Local councils have been under the pump for not doing more to encourage recycling.
- 1.7 Plastics use globally is being looked at closely following China's decision to close its borders to the world's low-quality recyclables. More and more countries are imposing specific packaging standards and requiring content recycling as part

¹ Background information on BusinessNZ is attached as Appendix 1.

of normal trading activity. New Zealand is not immune from these developments.

- 1.8 The above issues are quite rightly focusing attention on New Zealand businesses and households and whether they are doing enough to reduce waste and the extent to which more recycling is needed.
- 1.9 The Consultation Document (pp35/36) identifies six products for priority declaration. Under section 10 of the Waste Minimisation Act 2008 this would require the development and accreditation of a product stewardship scheme for each product, the six in question being:
- End-of-life tyres;
 - Electrical and electronic products;
 - Agricultural chemicals and their containers;
 - Refrigerants and other synthetic greenhouse gases;
 - Packaging; and
 - Farm plastics.
- 1.10 Of the Consultation Document's current list of proposed priority products, a number have been looked at several times over recent years. Tyres are probably the most obvious of these with the introduction of the broad category "packaging" a relatively new phenomenon.
- 1.11 As might be expected, BusinessNZ's membership has mixed views on the merits or otherwise of mandatory product stewardship (as opposed to voluntary product stewardship schemes of which there are a number currently in place). While some members are opposed to any form of priority product declaration, many others are receptive to at least one or more of the specified products potentially, over time, being subject to a formalised product stewardship scheme. BusinessNZ has therefore encouraged individual members to make their own submissions raising issues specific to their areas of expertise.
- 1.12 This submission comprises 3 further sections: First, a general discussion of waste policy or more importantly, the framework that should drive any regulatory intervention. Second, the conceptual issues needing to be considered. Third, specific comments on the questions posed on pages 35 and 36 of the Consultation Document.

- 1.13 However, BusinessNZ wishes to reiterate its earlier point that individual members might have a broad range of views on the merits or otherwise of the six priority product areas proposed. For this reason, BusinessNZ has made some general points on the six potential areas rather than necessarily supporting or opposing their inclusion.
- 1.14 BusinessNZ would emphasise that before inclusion can be either supported or opposed, there needs to be far more analysis of the six named products proposed inclusion than has to date been carried out, particularly of broad, undefined areas such as “packaging”.
- 1.15 BusinessNZ would be happy to meet with MfE to discuss our submission in more detail, should officials consider a meeting would be helpful.

RECOMMENDATIONS

BusinessNZ **recommends** that:

Before taking any steps to declare the proposed six products “priority products”, the Ministry for the Environment (MfE) should undertake a comprehensive cost/benefit analysis so that whatever is adopted provides overall net benefits, the objective being to ensure the betterment of New Zealanders’ economic, environmental, cultural, and social well-being.

2.0 GENERAL DISCUSSION

- 2.1 As a general principle, individuals and companies should bear the full costs 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. Waste minimisation is no different. If rational decisions are to be made about waste minimisation, those involved should ideally bear the costs (and benefits) associated with specific options/outcomes.
- 2.2 It is important to understand that there is an optimal amount of waste, just as there is an optimal amount of resource that should be spent on crime prevention etc. Waste cannot be eliminated completely, at least not without great cost. Waste reduction might be possible but beyond a certain point the marginal cost of waste minimisation becomes progressively higher, while the potential returns reduce. Economies of scale are often important when dealing

with certain waste streams, particularly relevant for smaller businesses facing the disproportionate cost of having waste and recycling companies pick up smaller amounts of recyclable or specialised waste.

- 2.3 Business New Zealand understands that the Consultation Document's general intent is to ensure waste is minimised and its potentially adverse effects reduced.
- 2.4 But taking appropriate action will be depend on a range of factors and certainly a one-size-fits-all approach is unlikely to be either efficient or cost effective.
- 2.5 Before any regulatory approach is considered, it is first important to fully understand the nature of the problem, who is affected, the cost involved and who bears that cost. Regulatory intervention should generally be considered a last, not a first, option to be invoked only when all cost-effective approaches have been exhausted.
- 2.6 The following list provides a brief outline of the predominant market failures often quoted in economic literature. These may have relevance when analysing government involvement in the waste market.

Externalities
Public Goods
Information failures

- *Externalities*

- 2.7 Externalities (or spillovers) lead to a divergence between private and social (public) costs or benefits, where private refers to the costs and benefits to those participating in market transactions, and social refers to the costs and benefits to all members of society.
- 2.8 Where there are externalities, market resource allocation may not be efficient. Individuals and firms that do not bear the full cost of the negative externalities they generate will engage excessively in such activities. Conversely, since individuals and firms do not reap the full benefit of activities generating positive externalities, they will engage less in those activities than is socially optimal.
- 2.9 Governments can respond to externalities in several ways. In some cases (mainly involving negative externalities) they can attempt to regulate or impose a levy or (tax) the activity in question. Alternately, a government can

encourage activities where positive externalities are created, for example, through subsidies, cash payments or other support mechanisms to people participating in such activities. Often such encouragements are output-based and intended to increase the production or supply of the positive externalities.

- *Public Goods*

2.10 Perhaps the strongest market failure argument relates to public goods. Public goods are effectively those activities from which people cannot be excluded and where the benefits to one person do not reduce the benefits to another.

2.11 Market participants will under-invest in public goods because they cannot appropriate most of the benefits of investment. So, from society's point of view, firm under-investment will be to everyone's detriment. To overcome this, governments will often step in to produce the goods in question or will contract the private sector to provide the goods for a fee.

2.12 Notwithstanding the above, it is often possible for the private sector to provide what are often considered to be "public goods" (like lighthouses) by providing the ability to tax shipping lines and/or charge port berthing fees.

- *Information Failures*

2.13 There are times in a market for exchange where one participant knows more about the quality of the product than does the other. This asymmetric information is often relevant in relation to health care where doctors, with their superior knowledge, may be able to disguise the quality of the treatment they provide.

2.14 Asymmetric information is not only relevant in the field of health care but also in a host of other markets for goods and services where, generally, government has seen fit not to intervene. Moreover, a direct intervention may often be less warranted or even inefficient compared to just having the government publicise information.

2.15 Given the above considerations, the case for potential waste management market failure, possibly justifying government involvement, will tend to focus on the externalities issue, i.e. where the person or company disposing of the waste does not bear the full costs of disposal.

3.0 CONCEPTUAL ISSUES WHICH NEED TO BE CONSIDERED

- 3.1 Irrespective of the pros and cons of declaring the Consultation Document's six products priority products, there are several issues requiring consideration at a conceptual level.

Legacy issues

- 3.2 Legacy issues, and more importantly, how to pay for them, are important when considering the six products now in line for product stewardship.
- 3.3 For example, tyre stockpiles or on-farm chemical stockpiles may be significant from a cost/management point of view and account will need to be taken of them.
- 3.4 As a general principle, any changes to the law should not apply retrospectively and accepting that, the cost of dealing with legacy issues will become an issue.
- 3.5 While some might consider the individual or company in control of the goods in question should bear the costs of disposal and recycling etc, there will have to be effective incentives to ensure products no longer fit for purpose but potentially hazardous are disposed of properly. Otherwise, if a significant cost is imposed, the policy introduced could, for example, encourage the disposal of hazardous substances inappropriately to avoid expensive compliance costs.
- 3.6 For this reason, it might be necessary to have an amnesty, perhaps funded out of general taxation, for certain products providing for their collection at minimal or no cost to the user. This, to date, is how other environmental legacy issues have tended to be dealt with, generally relatively successfully.

Timing of change

- 3.7 Any changes leading to the adoption of a mandatory product stewardship scheme must reflect the nature of the products and their respective markets.
- 3.8 Again, while not supporting (or opposing) mandatory product stewardship per se, BusinessNZ recommends that before making a declaration on any priority product, care is taken to ensure market processes, and the cost of necessary infrastructure, are clearly understood.

- 3.9 To this end, BusinessNZ is heartened that the Consultation Document accepts the importance of having all the market participants in the room to ensure outcomes are clearly understood if broad buy-in from all sectors is to be achieved to the extent possible.

"This approach should mean the Government can act more quickly and bring in businesses and social enterprise experience as required. Reasons for this include that government intervention can be slow and business can be far more agile in leading innovation in areas of expertise. Unlike the government, business can bring to the design process a deep understanding of supply chains, cost-effective logistics, product design, and stakeholder and customer expectation. For example, rather than specifying exactly how producers should get their products back from consumers and process them at end-of-life, the Government can specify broad requirements for convenient and safe product take-back and management. Producers (with their supply and retail chains) and other stakeholders can then design cost-effective methods to deliver these outcomes.

A co-design process will also benefit from including wider stakeholders. Collectors, recyclers and territorial authorities can inform practical sustainable solutions, and advocates for consumers and environmental and community health can highlight non-monetary costs and benefits. Māori must also be part of the co-design process as kaitiaki of the environment with responsibility to protect mauri and as partners with the Crown in good environmental management. This can help strengthen the 'social licence to operate' for producers and regulated product stewardship schemes, as well as deliver sustainable outcomes for future generations." (p.17)

- 3.10 The Consultation Document also states that co-design has already begun for certain proposed priority products, namely tyres, agrichemicals and refrigerants, with some discussion of the other products as well.

Understanding of geographical and population issues

- 3.11 New Zealand is a relatively small, mountainous country with a relatively low population base (5 million). While, significantly, close to 2 million people live in the Auckland region, the population base is generally widespread, particularly in the South Island, and likely to make product stewardship schemes, or at least ensuring most product is captured within a scheme, at times impractical.
- 3.12 Given a small and widespread population base, it might be economically impractical to require every product sold to abide by product stewardship rules. The sheer cost of moving say, tyres from an isolated area for recovery/recycling

etc. must be considered. As noted, there will be an optimal amount of waste; 100% recovery for products at their end of life will likely be impractical.

Infrastructure requirements

- 3.13 Making product stewardship compulsory without the necessary infrastructure to deal effectively with end of life, or legacy, products would be largely self-defeating.
- 3.14 In the past there has been concern about the cost and viability of the infrastructure required to allow for greater resource recovery/recycling.
- 3.15 Significant infrastructure, with potential taxpayer funding, will likely be necessary given the current doubtful returns from many resource recovery and recycling initiatives.
- 3.16 It may be possible for government in tandem with industry to set up recycling or reprocessing hubs around the country for materials collection, collation, and if need be processing so that:
- Larger quantities for materials can be consolidated locally (i.e. not needing to ship small quantities long distances); and
 - The economies of scale/economic viability for projects are enabled; and
 - Businesses relying on such collected material (i.e. secure steady volumes of certain materials) can be co-located with the same zone or hub.
- 3.17 There needs to be a degree of certainty as to the economics of the infrastructure investments involved, particularly to have the private sector prepared to invest.

4.0 COMMENTS ON THE SPECIFIC QUESTIONS IN THE CONSULTATION DOCUMENT (P.35-36)

Priority products (p.35)

- 4.1 **Do you agree with the proposed scope for priority products declarations for the following product groups?**

Q1: End-of-life tyres

- (a) **All pneumatic (air filled) tyres and certain solid tyres for use on motorised vehicles (for cars, trucks, business, motorcycles, all**

terrain vehicles, tractors, forklifts, aircraft and off-road vehicles).

- (b) All pneumatic and solid tyres for use on bicycles (manual or motorised) and non-motorised equipment.**

Yes/No/Not sure/Why/Why not?

- 4.2 BusinessNZ understands a considerable amount of work has gone into researching opportunities for recycling tyres and that Waste Management has developed a recycling plant in Auckland (with assistance from the Waste Minimisation Fund), which potentially could safely process around 50% of NZ's end-life-tyres.
- 4.3 While end-of-life tyres can be bulky and a bit of an eyesore if stockpiled, there is likely to be some debate as to the actual harm caused if disposed of in appropriate landfills, although the Consultation Document states that: *"Tyre dumping and stockpiling can increase the risk of harm from fire and toxic material entering air, soil and water"*.
- 4.4 Given the infrastructure at least partially exists to deal with a significant percentage of New Zealand's tyres, on the surface at least, it might make sense to include tyres in a nationwide product stewardship scheme.
- 4.5 But the above notwithstanding, the practicality of dealing with isolated pockets of the country where population base is low would need to be considered to ensure the economics of inclusion stacked up.
- 4.6 It is understood MfE has had extensive discussions with the industry as to whether such a scheme would be supported. Obviously, at the end of the day all affected will need to be consulted, including consumers who will ultimately have to pick up resulting added costs.
- 4.7 **Q2: Electrical and electronic products**
- (a) Large rechargeable batteries designed for use in electric vehicles, household-scale and industrial renewable energy power systems, including but not limited to lithium-ion batteries**
- (b) All other batteries (e.g. batteries designed for use in hand-held tools and devices).**

(c) All categories of waste electrical and electronic equipment (WEEE) defined in Annex II of European Directive 2012/19/EU (e.g. 'anything that requires a plug or a battery to operate')

Yes/No/Not sure/Why/Why not?

- 4.8 The government (along with previous governments) has promoted the greater use of electric vehicles in New Zealand making some use of various forms of subsidy to try and increase their take up rate.
- 4.9 With the move, relatively gradual to date, to greater electric vehicle use and other electric-powered mobility choices (such as battery powered bikes and or/scooters), many consumers are concerned that little effort has so far gone into determining how to deal effectively with the greater use of battery operated devices.
- 4.10 Notwithstanding the above, it is noted that batteries from electric vehicles and other sources are already being used as power banks for some industrial and home installations to capture renewable energy onsite. Likewise, some batteries may be swappable between different models of vehicle lines (i.e. Electric Vehicles of different years, potential conversions of fossil fuel vehicles to electric etc) negating the immediate need for disposal after their first "life". These types of "recycling" should be encouraged where appropriate.
- 4.11 Given the above, moving towards a scheme to deal effectively with battery-operated vehicles (big and small) could be considered a very worthy objective ((a) and (b) above).
- 4.12 As with other potential declared products, working with industry participants and suppliers will be crucial to designing a cost-effective scheme.
- 4.13 BusinessNZ notes that requiring anything that needs a plug to be subject to a priority product declaration ((c)) would need to consider how to deal with "legacy products" since there is a vast range of products currently in use or stored in various places at the end of their life.
- 4.14 There are also widespread differences in the harm associated with the various products which require a plug or battery in order to operate, from mainly metal (which may or may not be recyclable) through to waste electrical and electronic equipment carrying significantly harmful substances (e.g. mercury etc).

4.15 Careful consideration would need to be given to the costs and benefits of such comprehensive coverage although having economies of scale would be important in ensuring such product stewardship schemes worked effectively.

4.16 **Q3: Agricultural chemicals and their containers**

Chemicals in plastic containers up to and including 1000 litres in size that are used for:

- (a) any horticulture, agriculture and livestock production, including veterinary medicines**
- (b) industrial, utility, infrastructure and recreational pest and weed control**
- (c) forestry**
- (d) household pest and weed control operations**
- (e) similar activities conducted by or contracted by local and central government authorities**

This includes but is not limited to all substances that require registration done the Agricultural Compounds and Veterinary Medicines Act 1997, whether current or expired, and their contained (packaging) which are deemed hazardous until such time as triple rinsed.

Packaging for veterinary medicines, which includes syringes, tubes and flexible bags, must be phased in under the accredited scheme.

Yes/No/Not sure/Why/Why not?

4.17 There is no debate about the potential costs associated with the mismanagement of agricultural chemicals as outlined in the Consultation Document.

4.18 However, most farmers go to considerable lengths to ensure chemicals are properly stored and disposed of in accordance with good practice at the end of their useful life. Not only does this make good economic sense but farmers realise the importance of making sure their land, pasture, and animals are maintained to a very high standard.

4.19 However, it is entirely reasonable to have good systems in place to deal with both new chemicals coming on the market and with legacy chemicals which are no longer usable or where suppliers have gone out of existence and there is no

obviously safe way of disposal. Issues of cost, and where this lies, will need to be considered.

- 4.20 The big question is still how best to deal with such chemicals in a cost-effective way that minimises the risk of unintended consequences. For example, imposing significant clean-up fees could backfire if the objective is to collect as many harmful chemicals as possible.
- 4.21 BusinessNZ recommends that to understand both the risk and the potential opportunities better, MfE should work with organisations operating at what might be described as the frontline of agriculture, such as Federated Farmers.
- 4.22 Obviously, some differentiation will be necessary when using the broad term "agricultural chemicals" since over the years there have been significant efforts to make many chemicals less harmful to the environment (biodegradable etc) than in the past.
- 4.23 BusinessNZ has no expertise that would allow it to comment on agricultural compounds and veterinary medicines so again, working with practitioners on the ground, including vets and farmers, about the practicalities of introducing a new regime, would be a minimum requirement before MfE moved to declare these priority products.
- 4.24 **Q4: Refrigerants and other synthetic greenhouse gases**

(a) Refrigerants: all gases used for heating, cooling and air conditioning that are ozone-depleting substances under the Ozone Layer Protection Act 1996 and/or synthetic greenhouse gases under the Climate Change Response Act 2002, and products containing these gases.

(b) Methyl bromide and products containing this gas

Yes/No/Not sure/Why/Why not?

- 4.25 BusinessNZ notes that significant progress has been and continues to be made in reducing and phasing down the use of hydrofluorocarbons (HFCs) worldwide.
- 4.26 In October 2016, New Zealand joined around 200 other countries in adopting the Kigali Amendment to the Montreal Protocol on Substances that deplete the

Ozone Layer - HFC's being potent greenhouse gases commonly used in air conditioning and refrigeration.

- 4.27 The Kigali Amendment requires Montreal Protocol Parties to gradually phase down HFC production and use.
- 4.28 While BusinessNZ understands that refrigerant gases are currently within the ambit of the Emission's Trading Scheme (ETS) and therefore costs are paid for their use, it would seem desirable to collect as much of this material at end of life as possible, given some refrigerants have relatively high greenhouse gas effects.
- 4.29 While BusinessNZ has no specific expertise in refrigerant use, it would recommend that MfE consults closely with manufacturers, suppliers, and users of such gases to ensure any regime that might be applied to the sector is realistic and achieves a high percentage uptake. It is understood that several workstreams are already underway.

4.30 **Q5: Packaging**

- (a) Beverage packaging: used to hold any beverage for retail sale that has more than 50 millilitres and less than 4 litres of capacity, made of any material singly or in combination with other materials (e.g. plastic, glass, metal, paperboard or mixed laminated materials).**
- (b) Single-use plastic consumer goods packaging: used for consumer goods at retail or wholesale level made of plastic resin codes 1, 2, 3, 4, 5, 6 or 7, singly or in combination with one or more of these plastics or any non-plastic material, and not designed to be refilled.**

Yes/No/Not sure/Why/Why not?

- 4.31 As stated at the start of this submission, a number of the products which the Consultation Document proposes declaring priority products have been looked at several times over the years - the most obvious being tyres. Other potential priority products, such as the broad category Packaging, are a relatively new phenomenon.
- 4.32 BusinessNZ considers packaging to be so vast a category that the process of deciding on the right approach to take needs to be carefully managed. This includes, but is not limited to, what specific sectors should be looked at first.

- 4.33 It is important that the issues involved are clearly identified, and the right tools applied if success is to be achieved.
- 4.34 For example, one argument associated with the targeting of beverage bottles is their litter impact but many bottles can be recycled and there is generally a viable market for some plastics.
- 4.35 Illegal dumping (littering) should be seen for what it is rather than as a potential justification for mandatory product stewardship. Clearly, dealing with current illegal activity is the starting point before mandatory product stewardship is contemplated.
- 4.36 While it can be considered unsightly to have bottles (either plastic or glass) lying around in public places, the more logical process is to ensure the current law on littering is enforced or if it is ineffective, to look to strengthen it through potentially higher fines/enforcement mechanisms. If properly enforced, the law can be used to deter anyone caught littering, including freedom campers.
- 4.37 The point here is to try and address the problem by using the most appropriate tool.
- 4.38 Under (b) (single-use plastic consumer goods packaging), a range of issues needs to be considered when it comes to determining what should be done to ensure waste is minimised to the extent possible, either through re-use, recycling or other methods.
- 4.39 For example, some products require plastic packaging as a mechanism to ensure product quality, such as consistent water content, enhanced lifespan or for broader health and safety reasons.
- 4.40 The rationale for using different levels (and types) of plastic must be understood when looking to find cost-effective waste management solutions. There is clearly no one-size-fits-all over such a broad range of usage.
- 4.41 It is understood that some supermarkets (and other plastics users) have joined international forums with the specific aim of phasing out the use of certain plastics within agreed timeframes. Knowing that an international commitment to waste reduction has been made is likely to result in clear industry buy-in with industry monitoring providing a good indication of what progress is being made.

4.42 **Q6: Farm plastics**

- (a) **Plastic wrapping materials used for silage or lay, including but not limited to baleage wrap, hay bale netting, baling twine, and covers for silage pits.**
- (b) **Plastic packaging used for agricultural and horticultural commodities including but not limited to fertilizer sacks, feed sacks, and bulk tonne bags made from woven polypropylene and/or polyethylene.**
- (c) **Other plastic packaging and products used for agriculture and horticulture including, but not limited to, protective nets, reflective ground covers, and rigid plastic containers other than containers for agrichemicals, detergents, lubricants or solvents.**

Yes/No/Not sure/Why/Why not?

4.43 See comments under Q3: (above).

4.44 The Consultation Document states on p.41 that an estimated 70 percent of bale wrap and nearly 100 percent of twine, feed bags and crop protection netting are not being collected for recycling, despite a user-pays system for farmers who use pre-paid collection bags.

4.45 BusinessNZ would again recommend that MfE works with appropriate organisations operating at the "coalface" of agriculture, such as Federated Farmers, Fonterra and Horticulture NZ, to understand better the risks and potential opportunities.

4.46 **Ministerial guidelines for priority product stewardship schemes (p.36)**

Q7: Proposed guidelines

Do you agree with the proposed guidelines for priority product stewardship schemes outlined in table 3?

Yes/No/Not sure/Why/Why not?

4.47 BusinessNZ has no specific comments to make on the proposed guidelines. However, individual members may have issues of their own they want to raise in individual submissions to MfE.

4.48 **Q8: Changes to guidelines**

What changes would you make to the proposed guidelines for product stewardship schemes?

- 4.49 The only general issue BusinessNZ believes should be considered in relation to the proposed guidelines (Table 3) is the need to focus on the environmental harm and expected (environmental) benefits associated with the product stewardship scheme. At present there is little recognition of the broader economic, social, environmental, and cultural benefits (and costs) that might result. The broader benefits (and costs) and who bears those benefits and costs must be further investigated.

BusinessNZ's recommends that:

Before taking any steps to declare the proposed six products "priority products", the Ministry for the Environment (MfE) should undertake a comprehensive cost/benefit analysis so that whatever is adopted provides overall net benefits, the objective being to ensure the betterment of New Zealanders' economic, environmental, cultural, and social well-being.

Appendix One - Background information on 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](#)).