

Submission by



to the

Ministry of Business, Innovation and Employment (MBIE)

on the consultation document

A draft Minerals Strategy for New Zealand to 2040

31 July 2024

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– SUBMISSION BY THE BUSINESSNZ ENERGY COUNCIL –
A DRAFT MINERALS STRATEGY FOR NEW ZEALAND TO 2040

Introduction

1. Minerals are fundamental to society. They are inputs essential for products we rely on. It is lime in concrete, copper in electrical wiring, iron and chromium in steel, lead and molybdenum in cars, niobium, and titanium in aircraft, aggregate in road infrastructure. Minerals are in dentist drills, smart phones, computers, GPS devices, and heaters. Without the extraction of minerals, society would simply be unrecognisable.
2. With growing mineral demand across global markets, due in part to the manufacturing of renewable technologies, New Zealand should boost the export of minerals and metals currently extracted, and potentially other valuable minerals that remain unexplored. This would provide a small, compared to other markets, but worthwhile contribution. Or alternatively, we could relegate this role to other jurisdictions to fulfil. The latter would be a missed opportunity at the expense of current and future generations' economic and social wellbeing.
3. **We welcome the Government's intention to grow the economy, in part through outlining a strategy to increase investment and output in the mineral sector.** We support the strategy's acknowledgement of the importance of minerals to society and the contribution mining brings to New Zealand.
4. While extraction and use of minerals is an important part of a wider strategy to boost export receipts, improve economic growth and create high paying jobs in an already productive sector across regional New Zealand, it is equally important that mining occurs in an environmentally and socially responsible manner. Therefore, upholding strong community acceptance and social license to mine. Yet achieving this strategy, among many factors, requires an adequate and skilled workforce, sufficient investment, a reduction in knowledge gaps relating to potential reserves and less consenting delays.
5. Overall, **we support most of the actions outlined to achieve the strategy's stated goals.** These actions go a long way in addressing challenges to boost output. However, the overarching aim to double the value of mineral exports encounters some additional challenges that need to be addressed. This submission discusses some challenges and provides recommendations.

Overview of recommendations

- **We recommend regularly collecting and collating data, in a consistent format, on the industry's economic contribution. Data is currently fragmented and difficult to access. Improving data availability and quality will inform the strategy's target.**
- **We recommend the target should be amended to be clear and understandable. Currently, the interplay between both the 7,000 jobs and ten significant mining projects targets with an export value target is unclear.**
- **We recommend policymakers consider issues with an export value target.**
- **We recommend rethinking the current target to double export value as participants note it is unambitious and can be achieved in a shorter period, if the right investment occurs.**

- We **recommend** the Government works directly with the industry to uphold and demonstrate New Zealand's robust safeguards, strengthening the social license of mining and the strategy.
- We **recommend** actions to improve and promote the sector's social licence should be among the strategy's key pillars, demonstrating the sector's value.
- We **recommend** the Government pledge to retain the current approach to mining on conservation land as written in the Crown Mineral Act 1991. The Government should reiterate that it will not remove land designated under Schedule 4 of the Act. This will ease false perceptions and improve social acceptance.
- We **recommend** that the Government collaborates closely with other parties, and groups across society, to achieve cross party support to ensure the strategy is durable and regulatory frameworks remain stable over a prolonged period of time. This will support investment in the sector.
- We **recommend** GNS Science's mineral stocktake should investigate both onshore and offshore areas.
- We **recommend** policymakers consider and assess the difficulty of mining companies to receive finance for projects and its impact on achieving the strategy.
- We **support** the strategy's concept of enhancing a circular economy for recycled minerals but recommend assessing the problem before any decision to intervene and prioritise better waste price information if it is deemed a problem justifying intervention.

The strategy's target

6. We **support** the three main pillars underlying the strategy and the intention to increase the mineral exports. However, we would like to see clarity about the target which better defines its scope. As written, the strategy aims to double the value of mineral exports from the current value of \$1 billion to \$2 billion by 2035.
7. The strategy is not clear about the type of minerals which will be included in the target. The target is also not clear about the baseline year when mineral exports were valued at \$1 billion. We aware that there is currently no official data source that comprehensively provides a snapshot of the industry's total economic and export contribution.
8. Data is difficult to source and remains fragmented. A lack of public data is due in part to commercial sensitivity information. Collating economic data on the sector's contribution, including wider economic contributions in wages, taxes, and GDP, would help inform policymakers on the sector's current contribution and help clarify the Government's target and stated intention. The regular collection of industry data, across a range of sources in a consistent format, would be beneficial. **We therefore support Action 1b to improve the collection of Crown and private mineral data to better understand mineral production statistics.**
9. The draft strategy refers to a 7,000 jobs target and the establishment of ten significant mining operations of \$100 million revenue per annum each. There is currently no clarity to whether both goals would be official targets alongside doubling the value of mineral exports. It is also difficult to determine whether there is a distinction in importance and priority between the targets. For example, whether doubling the value of mineral exports is the primary target, followed by secondary targets detailing employment and ten mining projects. The strategy does not explain

how each target was informed and whether the Government believes the targets is achievable. Clarity about how the strategy's targets were informed would be valuable.

10. **We recommend the target should be amended to be clear and understandable.** It could be beneficial for the strategy to have only one main target to improve and clarify the direction of travel. As read, the main target is doubling the export value of New Zealand's minerals. Industry participants have noted that doubling export value from \$1 to \$2 billion is achievable, however, it remains unambitious and does not adequately reflect New Zealand's mining opportunities.
11. Participants highlight that mining could experience a significant step-change in its current contribution to employment, economic activity, and export receipts, if the right conditions apply and investment is attracted to New Zealand. We deem it appropriate to increase the target's ambition, setting a clear signal to investors that the Crown's promotional intent is not only reflected in the Crown Mineral Act but within the strategy.
12. We highlight that there are issues with an export value target that policymakers should consider when measuring the strategy's success. Export receipts attributable to the mineral sector change frequently. This variability is more common compared to other exported goods and services due to volatile commodity prices and more demand fluctuations. A better metric could be a clear and straightforward export volume target. However, this approach has its own caveats, as volume does not adequately measure economic value and its contribution to New Zealand's economy. Both a value and volume target could be beneficial.

Strengthening the social license to mine

13. One significant challenge facing the success of the strategy is retaining and enhancing the social licence to mine. There is a strong public perception that mining significantly damages the environment, with unacceptable costs to fauna and flora. Historical and international practice has informed some of this perception. There are jurisdictions with substandard or near non-existent environmental and labour protections, coupled with human rights abuses and widespread corruption.
14. Historical and international worst practise undermines support for new developments in New Zealand. This perception has implications for the industry. Receiving finance, discussed later, becomes difficult as institutions are reluctant to fund a 'socially unacceptable' industry. Attracting and retaining employees may also become difficult due to this negative perception.
15. In contrast to public perceptions, mining companies operating or planning to operate in New Zealand must comply with existing and stringent regulations that uphold robust environmental safeguards which require the avoidance, mitigation or remedy of adverse effects, compensation or offset for residual impacts, rehabilitation of sites once closed and labour laws that protect workers on site.
16. Mining activities are approved once a high bar for complying with environmental standards have been met. A criterion of requirements must be met before approval is given. The case-by-case approval process for any activity that impacts the environment, with decisionmakers specifying certain conditions during the process, upholds environmental best practices. One of many specified consent conditions often obliged on participants is site rehabilitation, requiring a new use or return to previous conditions once mining or quarry operations cease.
17. Parts of sites which become exhausted are often filled with rock and topsoil. Land is then replanted with vegetation, waterways restored or treated, and in the case of conservation land or forests, mining companies may translocate wildlife to the area. Alternatively, open pit mines or tailing dams

can be turned into ponds, lakes, or wetlands. The industry in New Zealand has a record of minimising or avoiding the environmental impact of its activities and successfully rehabilitating their sites.

18. One section of OceanaGold's open pit mine near Reefton was turned into a lake which will flow out into a neighbouring creek. Water outflows are treated and maintained, even after the site returns to the Department of Conservation. As of 2020, 800,000 seedlings were planted at the site with the outcome of forest regeneration and promotion of ecological succession.¹
19. Born out of OceanaGold's Macraes operation was a flat trout hatchery, producing between 5,000 to 8,000 trout annually.² The industry also funds community, sport, and educational activities, as well as programmes to help eradicate pests and weeds harmful to indigenous fauna and flora. Other examples include the Stockton mine breeding kiwis
20. **We support robust but workable environmental regulations imposed on the mining sector.** The industry strongly agrees with the sentiment to mine responsibly, acknowledging the important balance between environmental protection and resource development. They rightly understand that to operate the community must accept their activities. The public must be confident regulations and consenting framework are robust, ensuring mining happens in an environmentally and socially responsible manner.
21. Considering misconceptions remain, the industry can do better to communicate its solid environmental management track record. **However, the role of strengthening the social license of the sector extends to the Government.** It is vital the Government works with the industry to uphold and demonstrate New Zealand's robust safeguards, strengthening the social license of the strategy. Rhetoric depicting mining as a choice between either the environment or the economy is not helpful and does not reflect industry best practise exercised in New Zealand. Rhetoric of mining at any cost is equally unhelpful.
22. The industry works hard to ensure positive environmental outcomes and obligations are met. The Government must convey and reiterate this record. **Action 6 in the strategy to increase public knowledge and confidence in the sector is supported.** But we believe it should be a priority and play a larger role than currently indicated in the draft strategy. **We therefore recommend actions to improve the sector's social licence should be among the strategy's key pillars, demonstrating the sector's value.** Action 6c should be amended to ensure the Government works with the industry to share with the public the contribution modern mining makes to the environment and communities.
23. **The Government's responsibility in strengthening the social license of mining extends to protecting Māori interests and rights.** Māori have strong rights and interests in both the protection of natural resources and the extraction of minerals for economic and cultural purposes. **We support Action 3c to ensure constructive engagement with Māori.** Mining companies have strong relationships with iwi and hapū and consult with them closely and regularly. The Crown's strong and meaningful relationship with Māori, upholding rights and pursuing interests and opportunities with Māori, is vital to establishing community acceptance and building a long-lasting social license.

Consenting

¹ OceanaGold, *Reefton Restoration Project*, 2022

² OceanaGold, *The Biggest Catch*, 2022

24. The strategy mentions actions currently underway to reduce the time and cost required for obtaining consent, speeding up a currently slow, costly and cumbersome process. This includes introducing legislation to fast-track approvals for significant projects, amending the Resource Management Act to improve consenting processes, and enhancing the efficiency of permitting functions.
25. Efforts to improve consenting processes is vitally important to achieving the strategy's goals. However, as noted above, this requires balance and should uphold best environmental management practises; be entrenched in the enjoyment of property rights; provide a better recognition of trade-offs on a case-by-case basis; and a more widespread use of cost and benefit analysis. We refer to BusinessNZ's submission supporting the Fast-track Approvals Bill.³ The submission provides a number of suggestions to improve the Bill, ensuring there are clear and transparent decision-making principles in the Bill given the significant power provided to Ministers, as well as wider considerations that should be included.
26. Given some concerns about the Bill and its impact upon the social license of mining, it is important that decisions are informed by comprehensive environmental impact assessments and the process behind the final decision is transparent and guided by clear principles. We believe the strategy should outline and pledge this commitment. As part of the decision making process, incorporating local perspectives is also vital.
27. There is uncertainty and a perception that changes may occur which could potentially loosen current restrictions on conservation areas. The industry does not seek, nor does it support, any changes to the existing regime which would make it easier to mine on conservation land. Prohibitions in Schedule 4 of the Crown Minerals Act 1991 are supported and should remain in place.
28. The current regime's approach which assesses mining applications on conservation land on a case-by-case basis is sufficient and supported. It ensures permits, access arrangements, concessions and consents are obtained before access is granted, upholding environmental standards. **Action 3d, maintaining current permitting and access arrangement settings in relation to public conservation land is therefore supported.**
29. Conservation land outside Schedule 4 has varying value, with stewardship land having no formal assessment of value when included under DOC's protection. The existing case-by-case approach ensures potential mining activities on this land can be assessed on its merits and environmental impacts, allowing for a legal pathway to mine responsibly if certain conditions are met and relevant consents are obtained. A blanket ban on conservation land would provide little to no value as the robust framework to protect environmental values exist.
30. To improve the social license of mining in New Zealand, the Government should continue the current approach for mining on conservation land and reiterate that it does not intend to remove land designated under Schedule 4 of the Act. Neither the Government nor the industry want to mine in collectively treasured natural parks and areas of natural significance. Reiterating and being clear about protecting Schedule 4 land may reduce unease surrounding resource management reforms.

³ BusinessNZ's submission to the Environment Committee on the [Fast-track Approvals Bill](#), April 2024

Critical minerals list and stocktake

31. **We support the development of a critical minerals list, currently underway, and a stocktake of New Zealand's mineral potential.** Both pieces of work will be important for realising more opportunities in the sector. Such opportunities could include the extraction of vanadium, tungsten, lithium, nickel-cobalt, copper, phosphate, rare earth elements, silica, ilmenite, garnet, and antimony, in addition to minerals currently mined such as gold, silver and coal.
32. The assessment undertaken by GNS Science to outline a detailed stocktake of our mineral potential will help the sector better understand where resources are located, the quantity of such resources, the minerals' accessibility and what technology would be required to extract them. This information will inform expectations on possible developments and future investment decisions. Some mining opportunities might not be currently economic to pursue. But as technology evolves and commodity prices change, these opportunities could become viable and the stocktake will help inform these decisions.
33. **We are pleased the stocktake is not only limited to high value minerals often designated as inputs for low carbon technology.** The stocktake will include minerals such as lime, aggregate and sand, minerals vitally important for products used in housing construction and infrastructure such as roads. Lime is also an enabling mineral, essential for the extraction and purification process of other minerals including domestically extracted gold, as well as nickel, copper and lithium internationally. The stocktake's scope should also include the potential for underground storage of gaseous hydrogen. There could be opportunities posed by underground cavities including porous rock.
34. **To assess the full scope of New Zealand's mineral potential, we recommend the stocktake involves investigating both onshore and offshore areas.** The mention of offshore minerals potential remains light in the document. New Zealand's Economic Exclusion Zone is large and there could be opportunities for responsible offshore mining projects to take place. However, the assessment of both onshore and offshore opportunities must apply strategic thinking and trade-offs between areas potentially identified for mining and other competing uses.
35. We emphasise that the critical minerals list should not be limited to minerals designated for domestic consumption only. It should also include minerals demanded globally, which New Zealand may be able to supply. The minerals listed above, such as lithium, copper and vanadium for example, would be supplied to overseas markets as domestic consumption would be low. Instead, demand would be indirect from products that contain minerals.

Investment

36. The smooth and adequate facilitation of investment is crucial to achieving the Government's target. Action 7, to promote and attract investment opportunities to increase scale and pace of development is supported. **We strongly opposed the removal of "promote" in the prospecting, exploration and mining of minerals in the Crown Minerals Act Amendment Bill passed in 2023.**
37. Removing the promotional intent at the centre of the Act's purpose sent a message that the Government did not welcome new mines, reinforcing the existing perception of an anti-mining sentiment sent by the Government. **We welcome the Government's plans to reinsert "promote" and for the Minister to "attract permit applications."**
38. Proactive campaigns, trade missions and New Zealand's presence in international mining events, all with the purpose to promote New Zealand mining opportunities is beneficial. We are aware MBIE

has been allocated resources to promote New Zealand's mining sector. This is a positive development.

39. Fundamentally, New Zealand competes with other jurisdictions for mining investments. Despite the benefits of actively promoting the sector, one of the most important ways to attract investment is for New Zealand to be an attractive destination with commercially viable resources which can be extracted under a workable, robust and stable regulatory framework. Mines have long lifetimes, spanning years to decades. Large investments are required which have extended lead in times. A stable regulatory environment provides confidence that investments can take place without large changes risking the level of return or loss of investment.
40. Despite the Government's positive actions to improve investor sentiment in the sector, sovereign risk is still alleviated due to the possibility of successive Government's reversing or introducing regulatory changes that could restrict activity or burden the sector with unforeseen or unreasonable costs and compliance. A perceived divide which pits groups and political parties into cemented "pro-mining" and "anti-mining" factions is damaging to New Zealand's sovereign risk profile.
41. Investors start to question New Zealand's status as a country with a stable regulatory environment in the future, diminishing investment confidence. The strategy's success is therefore conditional on a multi-party approach, sending a clear signal that mining is supported, and investments will not be significantly undermined by successive Governments. Achieving total consensus is difficult and might not be possible.
42. Nevertheless, **we recommend the Government collaborates closely with other parties to achieve cross party support and ensure the strategy is durable.** The Government's cooperation with other political parties should extend to other groups in society, as noted earlier, communicating the current robustness of environmental regulation while pledging its continuation to ease concern.
43. We are also pleased work is underway to review barriers and restrictions within the Overseas Investment Act 2005 that repel foreign direct investment. BusinessNZ and BEC has long advocated for amending the Act to limit ministerial decision making to national security concerns and to ensure a timely approval process. New Zealand's overseas investment regime is one of the most restrictive in the OECD.⁴ This is problematic in the absence of domestic savings.
44. Overseas investors have been critically important for funding projects that might otherwise have gone unfunded across the entire economy. FDI has a role to play in boosting more investment in the minerals sector. To do this, the approval process must be simplified and straightforward to navigate.
45. The strategy does not adequately acknowledge wider barriers and difficulties experienced by mining companies in the process of applying for and receiving finance. Many financial institutions have increasingly become reluctant to lend capital to participants in emissions intensive sectors because of both regulatory and non-regulatory factors. Participants in upstream oil and gas, and coal mining in particular, have noted difficulty in receiving lending due in part to the industry's perception and emissions profile.
46. The inability or difficulty in sourcing finance required for day-to-day operations, new equipment, expansions, and new developments will impact the Government's stated target. **We recommend policymakers consider the difficulty, and sometimes inability, of mining companies to receive finance for projects and its impact on achieving the strategy.**

⁴ OECD, [FDI restrictiveness](#), 2020

Mineral processing

47. We note that the strategy has expressed the need to “*make informed choices about how we wish to develop our minerals.*” There could be opportunities to process minerals domestically. This could improve the value of exported minerals. However, we believe there are limited options the strategy and Government can adopt to improve the commercial attractiveness of mineral processing in New Zealand. Most minerals, represented in volume, are exported. The exceptions are coal, limestone, ironsands, sands and aggregate. We are aware that opportunities in New Zealand to add value to these minerals are limited. The extraction of other minerals in the future would also likely be exported due to limited demand domestically.
48. If minerals were to be processed in New Zealand, this would be a positive development. However, such opportunities should be pursued privately on a commercial basis. **Direct interventions in the form of subsidies and other financial incentives to develop mineral processing operations is opposed and well beyond the scope of the strategy.**
49. Action 4, outlines the strategy’s intention for the *encouragement of industry to process, refine and uptake downstream capabilities to add value to extracted minerals.* We question what action relating to encouragement would involve, and its value compared to more realistic and impactful actions within the strategy. Encouraging the development of a new mineral processing industry is a not a priority. Setting the right regulatory framework to encourage investment should be the key priority and we are pleased the Government is focused on improving the regulatory environment.

Research, innovation and partnerships

50. **We support the strategy’s actions as they relate to identifying ways to collaborate with the industry on research and innovation opportunities,** including the investigation of funding mechanisms to assist science and innovation in the minerals sector. Research about where minerals are located, how they can be accessed and what technology is required to access them will help discover mining opportunities, and as a result, will facilitate investment decisions.
51. Research extends to investigating opportunities in the extraction of minerals through more unconventional methods. This could include harnessing minerals during the process of extracting and using geothermal steam. Reduced funding for geology faculties across several universities could result in reduced skills and workforce capability in the sector. This could have consequences for achieving the strategy in the long term.
52. Enhancing relationships with trading partners in the mineral sector will be important for realising research and innovation opportunities. Markets with larger mining sectors have expertise, research and workforce capability which would help grow New Zealand’s sector and achieve the targets set within the strategy. While the strategy does not mention the country by name, partnering with Australia to identify opportunities for collaboration and joint initiatives for the international trade of minerals would be valuable.
53. The Australian Government has recently released its programme “A Future Made in Australia” with \$22.7 billion dedicated for the energy sector. It includes significant investment in renewable energy, which could complement New Zealand’s mineral strategy, particularly in the supply of minerals essential for these technologies.
54. Australia aims to become a renewable energy superpower, which aligns with New Zealand’s focus on minerals for a clean energy transition. Collaboration could involve joint research and development initiatives. With both strategies emphasising the importance of developing a skilled workforce, there could be opportunities for cross-country education and training programs, sharing

best practices, and facilitating workforce mobility. **We are pleased to see the Minister of Resources recently visit Australia to retain and grow relationships with mining companies and the Australian Government on opportunities to collaborate further in the sector.**

Mineral recycling

55. **We support the strategy's concept of enhancing a circular economy for recycled minerals, however, we recommend assessing the problem before making any decision to intervene.** Recycling has a role to play in meeting some demand for minerals and reducing some of the need for more extracted supply. We note that mineral recycling already occurs because in many instances it makes commercial sense. Despite the important role of recycling minerals, demand for current and future uses will still require the extraction of new supply.
56. The Government's role, as mentioned in Action 5, to assist the circular economy through several approaches, including possible funding mechanisms, could be worthwhile. However, before coming to any decisions as to the merits or otherwise of regulatory intervention in the market for mineral waste, it is crucial that policymakers take a step back and ask some fundamental questions. These include – but are not limited to:
- Is there a problem in New Zealand with current waste management system relating to minerals (i.e. are there significant issues of "market failure" which need to be addressed)?
 - If there is a problem, is the problem significant?
 - What are the costs and benefits (including unintended costs) of any proposal?
 - What are the potential options for improving outcomes which don't impose significant costs (e.g. improving information, including greater transparency in pricing signals to market participants)?
57. It is possible that potential barriers to additional mineral recycling could include information asymmetries and coordination challenges. Consumers may not have knowledge about the value of used minerals or where minerals can be recycled. There may be coordination challenges between consumers, councils and waste management operators which could impact how much mineral waste inevitably goes to landfill. Assessing whether information asymmetries and coordination challenges exist, and the extent of the problem, would better inform the best options to enhance a circular economy for recycled minerals as emphasised in the strategy.
58. As a general principle, individuals and companies should bear the full costs of their behaviour, with costs being internalised. Waste minimisation is no different. If decisions are to be made about waste minimisation, those involved should ideally bear the costs. Ensuring externalities are internalised should be one of the guiding principles behind any decision to intervene. Currently, at the household level, waste disposal pricing is fraught with difficulty and significant cross-subsidisation, with households generally paying for it out of general rates, with little incentive to ensure they face the true (user-pays) cost of disposal.
59. If more mineral recycling is indeed economic and worthwhile, it will likely occur without the need or presence of funding mechanisms. We note that funding mechanisms to encourage mineral recycling could be costly and risk recycling minerals beyond an optimal level. Beyond a certain point the marginal cost of waste minimisation becomes progressively higher, while the potential returns reduce.
60. 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.

61. **Overall, we consider that addressing the wider problem of sound pricing information which would encourage individuals, households and businesses to make rational choices between recycling and disposal would be more valuable and should be prioritised.** This would also have likely positive spillover effects in waste minimisation beyond efforts to recycle minerals.

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Appendix One - Background information on BusinessNZ Energy Council

About the BusinessNZ Energy Council

The [BusinessNZ Energy Council \(BEC\)](#) is a group of New Zealand energy organisations taking on a leading role in creating an affordable, reliable, and sustainable energy system for New Zealand. The BEC is a division of BusinessNZ, New Zealand's largest business advocacy group and the New Zealand Member Committee of the [World Energy Council \(WEC\)](#). The BEC offers a unique opportunity to shape the New Zealand's energy-system with business leaders, government, and research as well as access to global thinking on energy issues via our involvement with WEC.

About the World Energy Council

The World Energy Council is an independent global organisation that promotes an affordable, reliable and sustainable energy system for all. It is comprised of over 100 member countries. The Council provides impartial information on critical issues that affect society's well-being such as climate change mitigation strategies; energy efficiency; renewable energies; nuclear power; clean coal technologies; rural electrification; energy access; regional integration; urbanisation; geopolitics; innovation; finance; human capital; governance; resilience; hydrogen; storage; digitalisation; mobility; cooling; heating; behaviour change; scenarios; and transition leadership.

About the BusinessNZ

[BusinessNZ](#) is New Zealand's largest business advocacy body, representing:

- [BusinessNZ Energy Council](#) of enterprises leading sustainable energy production and use
- [Buy NZ Made](#) representing producers, retailers and consumers of New Zealand-made goods
- 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 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](#)).

