

Summary of Public Consultations on a UK-New Zealand Free Trade Agreement

June 2020

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Executive summary

Introduction

Since 2017 the United Kingdom (UK) and New Zealand have shared an intention to launch negotiations on a free trade agreement following the UK's departure from the European Union (EU).

From November 2018 – February 2019 the Ministry of Foreign Affairs and Trade (MFAT) ran a 12 week pre-negotiation public consultation process seeking New Zealanders' views on a free trade agreement with the UK to help inform the future direction of New Zealand's trading relationship with the UK. In March 2019, the UK and the EU agreed to extend the period for finalising the Brexit Withdrawal Agreement to January 2020.

On 31 January 2020 the UK formally exited the EU allowing it to enter into FTA negotiations with third countries.

In March 2020, MFAT commissioned PublicVoice, an independent research organisation, to analyse and report on all written views received during this initial stage of public consultation on a UK-New Zealand FTA. This document summarises the written responses and feedback received during this pre-negotiation consultation process.

What did people say?

The major themes arising from the written submissions were:

- The mutual benefits that might be expected through deepening trade ties with the UK, including growing our domestic economies, increasing consumer choice, supporting our counter seasonal partnership and diversifying current trade structures.
- Key concerns for submitters were a potential loss of regulatory autonomy, protecting New Zealand's environment, worries about the UK pursuing privatisation of New Zealand's public services and concerns about a protectionist UK approach to agricultural trade, including UK agricultural subsidies.
- Many submitters talked about what New Zealand should prioritise in a trade agreement. A broad range of views were received but common themes included: market access, trade facilitation, sustainable development and inclusive trade provisions to advance the interests of Māori, women and small businesses.

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- A large number of submitters, particularly individuals indicated their interest in improved visa access for New Zealanders to work and study in the UK. Some of these issues are not typically covered by trade agreements, and some submitters expressed concern about the impact of any visa changes on job opportunities and unemployment in New Zealand.

The consultation process

The Ministry sought the views of New Zealanders' on a UK- New Zealand free trade agreement between 23 November 2018 and 11 February 2019. A 'Have Your Say' website was developed (<https://www.haveyoursay.mfat.govt.nz>) which contained a discussion paper, an online submission form and two online polls. New Zealanders were invited to submit either through the Have Your Say website or directly by email to a dedicated Ministry email address set up for this purpose.

Most submitters to the Have Your Say website were individual members of the public. The website portal posed the following six discussion questions aimed at stimulating engagement on trade with the UK:

- What New Zealand should prioritise in a future FTA with the UK;
- Any areas where the UK and New Zealand could cooperate more closely;
- Trade barriers that New Zealanders may face, or are concerned about, in trading with the UK after Brexit;
- Specific industries, businesses or products that New Zealanders think could have better access to the UK's market;
- Other outcomes that will make it easier for New Zealanders to do business in the UK, including access to the right type of visas;
- Any concerns New Zealanders have with a possible free trade agreement.

However, submitters were not restricted to these topics and were free to respond with their views which did not touch on these topics as they saw fit.

The majority of submitters who opted to email the Ministry directly were industry bodies, professional bodies, businesses and civil society groups. These submitters elected to provide their views by letter setting out in detail their priorities and concerns regarding a free trade agreement with the UK.

Online poll questions

The multi-choice questions in the online poll were designed to prompt public discussion and feedback on New Zealand's future trade policy with the UK and should not therefore be regarded as scientific or statistically representative. The results from the online polls are included for interest and completeness and can be found on pages 25-26 of the report.

The poll questions were:

1. What should New Zealand prioritise in a trade agreement with the UK?
2. Are there any changes that would make it easier to do business with the UK?

Poll Question 1: What should New Zealand prioritise in a trade agreement with the UK?

In answering this poll, submitters could pick any of the following policy areas:

- (a) Preserving NZ's right to regulate;
- (b) Quicker Customs clearance;
- (c) Lower tariffs for NZ exporters;
- (d) Improved conditions for investors and service providers;
- (e) Environmental and Labour standards;
- (f) All of the above;
- (g) None of the above;
- (h) Other.

If submitters answered (h) they were then asked to provide their own thoughts on what they thought NZ should prioritise.

Poll Question 2: Are there any changes that would make it easier to do business with the UK?

In answering this question, submitters were given the option of choosing "Yes", "No" or "Unsure". For each of those answers submitters could then provide an explanation supporting that answer if they chose. The table at page 26 reflects the responses of all submitters who answered yes to this question and the supporting explanation given.

Analysis methodology

As a result of the two consultation processes, two separate types of data were collected. They were:

1. Written submissions (received via the Have Your Say website or emailed directly to the MFAT dedicated email address provided)
2. Online poll responses.

Written submissions

Written submissions were received via the 'Have Your Say' website or sent directly to MFAT. Written submission data was imported into MAXQDA, a specialised qualitative data analysis program where responses were coded and categorised into themes. Tables illustrating the frequency of codes associated with each theme have been included to demonstrate the significance of each theme. It is important to note that in some cases a submission may be coded more than once with the same code as the coded element might have been mentioned multiple times in a single submission. Blank submissions made which did not include any written content were not included.

Online poll responses

The completed responses to the online polls have been reported using frequency analysis and reported as bar charts. Online poll results are not to be regarded as scientific or statistically representative.

Summary of submissions

A total of 240 written submissions were received. Of those, 204 were received through the Have Your Say website¹ with 35 sent directly to the Ministry's dedicated email address. Of the submissions sent directly to the dedicated email address, 12 were from New Zealand industry groups,² 12 from individuals, 2 from New Zealand professional bodies; 3 from New Zealand businesses, 2 from New Zealand trade unions, 2 from UK industry groups, and 1 from a Māori collective submitter. A list of all but individual submitters is set out in Annex 1 of this report. A breakdown of all submissions received is detailed below:

Submitter type	Count
Individual	215
New Zealand industry group	17
New Zealand professional body	2
New Zealand trade union	2
New Zealand business	3
UK Industry	2
Māori collective	1

Definition of Submitter types:

Individual: submitter who provided views in his or her personal capacity and not on behalf of a company or other body

Industry Group: submitter providing views on behalf of a group of companies, whether a business organisation more generally, or in relation to a specific sector

Professional Body: submitter providing views on behalf of a group of members practising a profession

Trade Union: submitter providing views on behalf of an organised association of workers

Business: submitter providing views on behalf of an individual company

Māori collective: submitter who provided views on behalf of a collection of whanau with shared ancestral lineage

¹ The total number of submissions the Have Your Say website registered was 212. 8 of these were blank or duplicate submissions.

² Two industry submitters submitted via the Have Your Say website.

















































Benefits	Frequency raised	
boost trade ties		34
grow bilateral relationship with UK		27
support for the rules based trading system		13
increase consumer choice		11
grow the economy		11
seasonal complementarity		11
complete negotiations quickly		10
strengthen Commonwealth ties		8
UK as a progressive trade partner		6
potential to increase R&D collaboration		4
stepping stone toward accession to CPTPP		4
Priorities	Frequency raised	
market access		86
removal of tariffs		55
removal of non-tariff barriers		31
trade facilitation		75
addressing technical barriers to trade e.g. standards, labelling		40
regulatory coherence		22
addressing sanitary and phytosanitary issues		8
expedited Customs clearance		5
sustainable development		51
protect New Zealand ecology and environment		39
maintain New Zealand biosecurity standards		12
Māori interests		17
benefit Māori economy and global indigenous economy		7
Treaty of Waitangi provisions		6
protect Māori intellectual property, taonga, customs		4
inclusive trade provisions		15
ensure wider New Zealand society benefits		12
safeguard affordability of goods for New Zealanders		10
regional economic growth and SME engagement in trade		9
gender equity		6
transparency of negotiations		4
human rights		9
intellectual property protection		12
movement of business persons		12
investment		11
digital trade		5
mutual recognition of qualifications		4
Concerns	Frequency raised	
preserve right to regulate		31
uphold New Zealand's labour/business standards		20
concerns about UK protectionist approach and bid for 'special treatment'		13
protect New Zealand brand		12
concern about Investor State Dispute Settlement (ISDS)		6
protect NZ public services, including health sector		11
concerns about UK approach to WTO Tariff Rate Quota (TRQ) commitments		7
safeguard New Zealand jobs		4
concerns about state of UK economy		2
Other	Frequency raised	
Visa access		36

Figure 1 Overview of theme structure

FTA Benefits

The majority of submitters recognised and commented on a range of benefits and opportunities for the economy, business and people arising from a free trade agreement with the UK. The most frequent related to potential economic gains through free trade. Another common benefit was the opportunity to re-establish our historical and cultural ties with the UK. Several industry submitters highlighted New Zealand’s unique seasonal complementarity with the UK and how this could be used to further collaborate in each other’s markets.

Many submitters felt that a UK FTA would signify support for the international rules based trading system. Others were of the view that an improved trading arrangement with a partner like the UK would allow New Zealand to diversify its range of trading partners. Some submitters made points about free trade leading to more competition and enhanced consumer choice for New Zealanders. A number of submitters set out the ways in which a free trade agreement would lead to more trade with other trading partners and thereby benefit the economy.

There were a number of individual submitters who raised the importance of working swiftly with the UK to complete negotiations on a high quality comprehensive agreement. Many submitters seeking a swift negotiation were concerned about the impact of Brexit and asked the New Zealand government to assist New Zealand exporters in minimising any disruption in global supply chains caused. Several submitters commented that a UK-New Zealand FTA would benefit the UK as it worked towards its aspiration to accede to the CPTPP.

Theme	Frequency raised
boost trade ties	34
grow bilateral relationship with UK	27
support for the rules based trading system	13
increase consumer choice	11
grow the economy	11
seasonal complementarity	11
complete negotiations quickly	10
strengthen Commonwealth ties	8
UK as a progressive trade partner	6
potential to increase R&D collaboration	4
stepping stone toward accession to CPTPP	4

Figure 2 FTA benefits breakdown of subthemes

Boost trade ties

A significant number of individuals, industry and business submitters strongly supported a free trade agreement with a partner like the UK, with many submitters setting out the range of benefits to be derived from an enhanced trading relationship with one of our oldest trade partners. Submitters expressed the view that a UK-New Zealand FTA agreement with a post Brexit UK would preserve the trade interests of both New Zealand and the UK, maintain parity with competitors in the UK (and vice versa) and generate new benefits for New Zealand and UK businesses and consumers. Many industry submitters noted that a high quality agreement would not only deepen economic ties but provide certainty to businesses in both countries about the trade rules that apply, particularly, in what one industry submitter described as, this “unpredictable turbulent trade environment”.

The UK is already a very significant trade and investment partner for New Zealand: it is a top export market, and a very important source of imports. A closer trade relationship would offer significant new opportunities to both sides to expand business in agriculture and food as well as technology, services (including tourism, education and environmental services), niche and high-value manufacturing, research and investment.

ExportNZ

Grow bilateral relationship with UK

Many submitters viewed an FTA with the UK as an exciting opportunity to deepen connections with the UK through our shared history, cultural connections and values. There were a number of references to the UK as an “old friend” as well as comments seeking to embrace our shared collective history (such as defending Britain in two World Wars), in addition to similar values and ethics. There was an overwhelming sentiment from submitters that a UK-New Zealand FTA was a natural extension of an already long standing, positive and collaborative relationship.

We are family, we speak the same language. We drive on the same side of the road. NZ came to help in [sic] hour of need, this should never be forgotten.

Have Your Say submitter

I totally support the principle of an early FTA with the U.K. This is a massive opportunity to secure a high value FTA with a country that has shared values and standards.

Have Your Say submitter

Of significance to this organisation and our members however, are the close UK/NZ bilateral relationships encompassing the supply of goods and services, the collaborative work some companies undertake in third country markets and two-way investment. We need to preserve and grow these beneficial aviation relationships, to mutual economic advantage.

Aviation NZ

We agree wholly that the UK and NZ are old friends with a history of valuable trade and wider working relationships. As two globally important sheep farming nations we enjoy complementary research and development and trade experiences in both sheep meat and wool, and the sharing of sheep farming work experiences between our countries continues to be of immense value.

National Sheep Association

Support for the rules based trading system

Seven industry submitters raised the importance of a rules based system and of WTO principles in order to effectively manage risk and facilitate trade. One industry submitter encouraged the New Zealand and UK governments to develop frameworks based on international science-based trade

rules. Another industry submitter specifically mentioned the role of International Plant Protection Convention (IPPC) as an example of an international framework currently being utilised by the UK and New Zealand to facilitate safe trade where producers and the public can benefit.

The sector is of the view that an ambitious, high quality and comprehensive bilateral FTA which builds on WTO foundations and enhances current rights and commitments, will demonstrate the United Kingdom's and New Zealand's global trade liberalisation leadership ambitions and serve as a useful reminder about the importance of the rules based trading system at a time when protectionism is taking centre stage.

Beef + Lamb NZ and Meat Industry Association

Increase consumer choice

Five Industry submitters, one business and six individuals raised the additional benefits to the consumer through a more competitive market and additional supply chains.

A UK-New Zealand FTA has the potential to increase these levels of investment, movement of people as well as the flow of goods and services between the two nations. This will be beneficial to agricultural, and wider, producers and consumers in both the UK and New Zealand.

Federated Farmers

Grow the economy

Industry bodies in the agriculture, dairy, wine, aviation and music sectors outlined the potential economic benefit through a high quality free trade agreement. Several industry submitters outlined the ways in which the benefits of free trade contributed to regional economies and jobs in New Zealand, providing figures and case studies to illustrate their point. The New Zealand wine sector noted the value derived by the UK economy through current global supply chains. Individual submitters were also clear in indicating they saw a free trade agreement as helping to increase New Zealand's export returns and in doing so, the New Zealand economy.

New Zealand exporters will benefit from an enhanced opportunity to export their products to one of the world's largest dairy import markets (which has been liberalised to imports from European Union producers for over 40 years), with flow-on benefits to New Zealand regional economies and jobs

Dairy Companies Association of New Zealand

As a result of vertical integration of value chains, just over 40% of that wine is exported in unpackaged format and then bottled in the UK. The value added in the UK provides an economic benefit in terms of jobs and profits to the UK economy.

NZ Wine

Seasonal complementarity

Seven industry submitters and two individuals raised the mutual benefits presented by New Zealand's counter-seasonal production through complementary production and supply in the agriculture and horticulture sectors. Industry submitters provided examples of ways in which UK and New Zealand producers were utilising this counter-cyclical production to work together to supply a high quality product all year round in a range of markets. One industry submitter provided a case study to illustrate how imports and exports of their New Zealand product peak, fall and diversify in the UK market throughout the seasons and how that is being successfully managed. Another industry submitter noted the situation in regard to shoulder seasons, commenting that this is generally offset by strong mutual interests in maintaining continuity and the overall benefits derived from seasonal complementarity. Submitters were in agreement that the benefits of seasonal complementarity included: maintaining market stability through maintaining price levels throughout the year and increased opportunities to work together on marketing and development.

Given that New Zealand is counter-seasonal to the UK, there are complementary opportunities for our respective agricultural sectors. Asian distributors and consumers expect year-round supply of products, such as lamb, beef and dairy products. Our counter-seasonal industries would help maintain year-round supply and contribute to the growth of the sectors in both countries without being in competition. Furthermore, this diversification could also provide opportunities for UK firms to leverage NZ business relationships in markets like China for mutual benefit.

ExportNZ

Complete negotiations quickly

Four industry submitters and six individuals called for negotiations with the UK to commence quickly in order that the benefits of a trade agreement are felt as soon as possible. Many of these submitters caveated the priority of concluding negotiations quickly with the view that any agreement reached should be high quality and comprehensive. Several submitters' desire for negotiations to be completed quickly was driven by a concern over minimising the adverse impacts on New Zealand exporters that might be caused by the UK formally leaving the EU Single Market and Customs Union without a deal.

Get it done sooner rather than later to help NZ exporters

Have Your Say submitterNZIBF recommends that the New Zealand Government pursue a substantive and mutually-advantageous outcome to the negotiations as quickly as possible, with a view to an early conclusion to the negotiating process.

NZ International Business Forum

Strengthen Commonwealth ties

Eight individuals raised the possibility of an FTA with the UK creating an opportunity for New Zealand to strengthen its ties to other Commonwealth countries, such as Canada, Australia, India and African Commonwealth nations. These submitters suggested that closer cooperation between Commonwealth countries would increase trade and global influence for mutual benefit, with some referring to the example of the Closer Economic Relations Trade Agreement between New Zealand and Australia.³ Three of these individuals asked whether a UK FTA might be a positive step towards a CANZUK alliance.⁴

I want the UK-NZ agreement to be just like the NZ-Australian CER agreement (i.e. freedom of movement of citizens, goods, services and capital), AND, I want it to include Canada & Australia. I want freedom of movement of citizens, goods, services and capital between all four countries.

Have Your Say submitter

UK as a progressive trade partner

Four industry bodies, one business and one Māori collective submitter referenced the UK as an ideal trading partner with which New Zealand might look to pursue an ambitious trade agreement. Particular mention was given to developing trade provisions with the UK that were more inclusive, socially responsible and protected the environment. Other areas raised in which the UK and New Zealand might look to develop modern provisions fit for the 21st century were: intellectual property, regulatory coherence and the digital economy. One industry submitter caveated its specific request for inclusive provisions in recognising that some solutions around inclusivity lie outside the immediate scope of trade policy. One Māori collective submitter raised the unique relationship between Māori and the UK, and the way in which a free trade agreement might open up opportunities between Māori and UK business through a shared understanding and respect for tikanga Māori principles.

In theory, a trade agreement between Māori and the UK should involve teaching all of us how to maximise profits by following principles of tikanga, morality and justice.

Patuharakeke o Te Parawhau

Potential to increase R&D collaboration

Two New Zealand industry submitters, one business and one individual submitter thought an FTA with the UK could open up opportunities to cooperate with the UK's research and development institutions

³ <https://www.mfat.govt.nz/en/trade/free-trade-agreements/free-trade-agreements-in-force/nz-australia-closer-economic-relations-cer/>

⁴ Some made reference to the CANUKCANZUK International concept, see <https://www.canzukinternational.com/>.

to develop new products, services and solutions, within both the primary and non-primary sector industries. Submitters referred to a variety of ways in which New Zealand and UK industries could learn from one another. Submitters outlined the possible benefits through greater product innovation in agriculture, food, technology, tourism, education and environmental sectors.

In any negotiations with the United Kingdom about a free trade deal New Zealand must focus on the opportunities to co-operate with research and development institutions within the United Kingdom to develop new products, services and solutions.

Have Your Say submitter

This cooperation takes place on a number of levels, from exchanges of farmers to learn from one another, to collective action to support the nutritional role of meat in a balanced diet, through to cooperation in developing methodologies for assessing the environmental impacts of livestock production. For example, arising from an international sheep meat forum held in Brussel in 2013, New Zealand coordinated the development of a global greenhouse gas footprint methodology for sheep meat to farm gate level. This methodology has since been adopted by the International Meat Secretariat.

Federated Farmers

Stepping stone toward accession to CPTPP

Three industry submitters and one individual commented that an FTA with New Zealand would be a useful first step for the UK in preparation towards Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) accession.

For the UK, negotiating an early FTA with New Zealand would demonstrate its trade-liberalising credentials and serve as a solid preparation for and building block towards its aspiration to joining the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP).

NZ International Business Forum

Figure 3 FTA benefits - selected quotes

FTA Concerns

New Zealanders voiced a range of different concerns over the possible effects of a free trade agreement with the UK. A major concern for submitters was in ensuring that New Zealand maintained its right to regulate for the public good. There were also clear concerns about possible inclusion of an investor state dispute settlement clause. This concern was followed up by submitters who asked that the New Zealand Government ensure that New Zealand's labour and business standards were not compromised in any agreement with the UK. A number of submitters also voiced concerns about the UK taking a less liberal approach than New Zealand or seeking preferential treatment without reciprocation. Protecting New Zealand's clean, green image and reputation for high quality products was a reoccurring theme which tied into requests that the agreement incorporate strong

environmental protections. Several individuals raised concerns about the impact of Brexit on the UK's ability to negotiate a trade agreement with New Zealand.

Theme	Frequency raised
preserve right to regulate	31
uphold New Zealand's labour/business standards	20
concerns about UK protectionist approach and bid for 'special treatment'	13
protect New Zealand brand	12
concern about Investor State Dispute Settlement (ISDS)	6
protect NZ public services, including health sector	11
concerns about UK approach to WTO Tariff Rate Quota (TRQ) commitments	7
safeguard New Zealand jobs	4
concerns about state of UK economy	2

Figure 4 FTA Concerns breakdown of subthemes

Preserve right to regulate

Preserving New Zealand's right to regulate in the public interest was a dominant concern expressed by 27 individuals, two industry sector groups, one professional body and two trade unions representing over 320,000 individual members between them. One sector body stipulated that an FTA with the UK needed to protect the ability of government to legislate, regulate and plan for health promotion, deliver equitable health care, including for future unanticipated health issues. Another group raised the importance of retaining New Zealand's sovereign right to protect human, animal and plant life. A third group raised the importance of preserving the right of governments to regulate in the public interest, including for national land markets, taxation of multinational businesses and public services

Agreements should not restrict the government's ability to legislate, regulate or make policy for issues that could affect health, including future unanticipated ones.

NZ Medical Association

Uphold New Zealand's labour/business standards

Twelve individuals, three industry submitters, two trade unions and one Māori collective submitter raised concerns about potential erosion of privacy, civil and labour rights and standards through a UK FTA. Some individuals referred to the importance of ensuring both imports and exports were fairly and ethically produced. Others noted that maintaining socially responsible standards was crucial to maintaining reputations and leadership in both markets and the wider international community. One trade union (representing over 320,000 members) sought a comprehensive labour chapter including commitments to ILO Core Conventions and other relevant international conventions. The same union raised concerns around the impact of labour laws in respect of government procurement and sought employment, health and safety protections in any procurement processes included in the FTA. One industry submitter noted the importance of access to skilled labour, and the importance of fair labour standards in this regard.

Environmental & labour standards are crucial to maintaining a responsible image to the UK & the rest of the world. NZ also needs to put these concerns ahead of monetary interests because we are a country which looks beyond economics to the wider global picture.

Have Your Say submitter

Concerns about UK protectionist approach and bid for ‘special treatment’

Eleven Individuals and one industry submitter raised a variety of concerns about the UK’s treatment of New Zealand in the 1970s when it joined the EU. Some individuals sought assurances that New Zealand would not be put at a disadvantage again by an FTA with a post Brexit UK. Some of these submitters indicated that New Zealand should not be swayed by sentimental attachments to the UK due to historic and colonial associations, but should instead prioritise trading partners based on merit and compatibility. Two individual submitters felt that the UK might face a reduced economic outlook following its departure from the UK and there may be little advantage to be gained from a UK trade agreement. Several submitters specifically referred to concerns about UK agricultural subsidies. One industry body representing 5,000 businesses raised the use of domestic horticultural subsidies by the UK, exported either to New Zealand or to other markets, in competition with New Zealand product and the adverse impacts such subsidised competition can have.

Subsidisation of horticultural production disconnects the real price of production from the consumer. This limits improvements in productivity, preventing focus on costs from the impact of farm inputs and environmental performance, and contributing to food waste due to the disconnect between food production and consumption

Horticulture New Zealand

The direct subsidies paid to UK farmers by the UK government will be a problem as there will not be a level playing field in agriculture.

Have Your Say submitter

Protect New Zealand brand

Five individuals and two industry bodies raised the importance of ensuring New Zealand’s brand as a producer of high quality products within a sustainable, responsible “clean green” environment was not compromised. Some wanted to see this enhanced through any future trading agreement. One industry body, representing over 2,000 members noted the value a free trade agreement could have in raising the profile of each partner in the eyes of consumers, manufacturers, service providers and investors in the others economy. The horticulture industry representing over 5,000 members, highlighted the reliance it placed on New Zealand’s excellent biosecurity status and importance this held for market access opportunities through New Zealand’s reputation as a global leader in productivity, innovation, sustainability and high quality production.

With a small antipodean country like NZ they get the highest quality fruit, produce, wine meat, vegetable and amongst the best seafood in the world. Premium product, premium price.

Have Your Say submitter

We need to support our trade by reducing barriers to trade without jeopardising quality.

Have Your Say submitter

Concern about Investor State Dispute Settlement (ISDS)

Five individuals and one trade union (representing 320,000 members) voiced opposition to ISDS, highlighting fears about international corporations and their ability to sue the New Zealand government through an ISDS mechanism. These submitters expressed concern that this would give unwarranted power to corporate interests and in doing so would encroach upon New Zealand's sovereignty.

Our opposition to ISDS is widely shared and well known. We support the Government's position of opposing ISDS in agreements and seek assurance this will be non-negotiable case in these negotiations.

NZ Council of Trade Unions

Protect New Zealand public services, including health sector

Some submitters raised concerns about the possible impact of services liberalisation on public sectors which cover non-commercial objectives such as health, social, cultural and environmental purposes. Some worried that the UK might have particularly aggressive interests in privatising New Zealand's public services, warning that the right of government to regulate for the public good must be maintained. Three trade unions focused on this issue in particular, asserting that commercial interests not be prioritised over protecting New Zealand's public sectors. One trade union pressed for a more explicit exclusion clause that would ensure public services such as the education, health and social security sectors could not be privately acquired by states or investors.

The UK's many privatised industries such as water, electricity and rail, despite being highly controversial in the UK, similarly may lead to aggressive interests in these areas, bringing pressure to increase private provision of public services. Its large finance sector could bring further pressures to further deregulate or against strengthening regulation, which would increase dangers of financial instability. We would be very concerned if any of these risks were increased in an agreement.

NZ Council of Trade Unions

Concerns about UK approach to WTO Tariff Rate Quota (TRQ) commitments

Four industry bodies and one business raised strong concerns in respect of EU-UK proposals to split WTO TRQs, including for sheep meat, dairy products and beef, following the UK's formal departure from the EU. These submitters set out clearly the way in which the proposed reductions would reduce

flexibility and practical market access for New Zealand exporters, contrary to bound WTO commitments. Submitters were of the view that an FTA with the UK should build upon New Zealand's current market access into the UK by eliminating tariffs, not be required to regain a loss of access caused through the UK's departure from the EU. One industry submitter advocated for a more consultative process to be undertaken on WTO TRQs, with another noting the importance of Geneva based engagement continuing in order to reach an outcome which leaves New Zealand no worse off.

Federated Farmers strongly opposes the joint EU-UK position to apportion the TRQ between the UK and the remaining 27 EU member states upon the exit of the UK from the EU. The EU decision to apportion the EU tariff rate quota will reduce flexibility and practical market access for New Zealand exporters and is in violation of the EU's commitments under the WTO. We support the New Zealand Government, along with many of the trading partners of the EU and UK in advocating for a more consultative process to be undertaken.

Federated Farmers

Safeguard New Zealand jobs

Three individuals and one trade union raised concerns about the impact of a UK FTA on New Zealand jobs. The trade union cautioned about any agreement that might raise expectations for increased student and working holiday visas into New Zealand, and the impact this could then have on New Zealand unemployment. Two individuals echoed similar concerns about how a bilateral agreement with the UK might encourage an influx of low skilled workers into New Zealand, taking New Zealand jobs. In contrast, one individual focused on New Zealand's 'brain drain', suggesting ways to keep highly skilled jobs in New Zealand through local-producer investor cooperatives.

Essential for NZ's fiscal integrity is reversing the 1980s-to-2000s flow of NZ jobs to overseas.

Have Your Say submitter

Immigration levels have resulted in increased unemployment and wages as a result of previous trade agreements on student and working holiday visas.

New Zealand Council for Trade Unions

FTA Priorities

Theme	Frequency raised
market access	86
removal of tariffs	55
removal of non-tariff barriers	31
trade facilitation	75
addressing technical barriers to trade e.g. standards, labelling	40
regulatory coherence	22
addressing sanitary and phytosanitary issues	8
expedited Customs clearance	5
sustainable development	51
protect New Zealand ecology and environment	39
maintain New Zealand biosecurity standards	12
Māori interests	17
benefit Māori economy and global indigenous economy	7
Treaty of Waitangi provisions	6
protect Māori intellectual property, taonga, customs	4
inclusive trade provisions	15
ensure wider New Zealand society benefits	12
safeguard affordability of goods for New Zealanders	10
regional economic growth and SME engagement in trade	9
gender equity	6
transparency of negotiations	4
human rights	9
intellectual property protection	12
movement of business persons	12
investment	11
digital trade	5
mutual recognition of qualifications	4

Market access

A wide range of industry, business, professional and individual submitters asked the Government to prioritise the elimination of tariffs and reduction of non-tariff barriers in a trade agreement with the UK, noting the importance for New Zealand's economy of freer trade. A number of industry submitters provided specific figures and examples to illustrate the point. Goods which received specific mention for tariff liberalisation were: beef, sheep meat, dairy products, fish and seafood, honey, wine, beer, spirits, processed foods, wood, wood products and horticultural products, including apples and pears. Many submitters referenced the way in which economic liberalisation through the reduction in New Zealand's tariffs had improved the efficiency and competitiveness of New Zealand's exports to the benefit of New Zealand consumers. Both industry and individual submitters pointed to the opportunity a post Brexit UK had to achieve similar benefits. A large number of individual submitters expressed the view that 'free trade should mean free trade', with the post-Brexit UK identified as an ideal potential trading partner with which to strive for this level of liberalisation. A number of submitters noted consumer interest in "high quality" UK products, with some pointing out that free trade would make imported products from the UK more affordable for New Zealanders.

NZIBF would want to see a comprehensive and ambitious market access outcome involving the elimination of all tariffs including all in-quota tariffs; the significant expansion leading to the elimination of tariff rate quotas, and the removal of other barriers to trade including regulatory barriers

NZ International Business Forum

Reducing tariffs has been very beneficial to NZ consumers and made NZ producers more competitive over the past 30 years. Post-Brexit, the opportunity exists to reduce tariffs between the UK and NZ, and achieve more of the same benefits for both countries.

Have Your Say submitter

Trade facilitation

All industry, professional and business submitters, together with 20 individuals raised trade facilitation as an important area of focus in a UK-New Zealand FTA. Industry and professional submitters called for WTO-plus provisions in relation to technical barriers to trade, phytosanitary rules and a focus on robust regulatory coherence provisions. Many submitters referred to the importance of standards and regulations that are 'science based' and 'outcome focused'. Some industry submitters mentioned their support for the inclusion of sectoral annexes and cited CPTPP as a reference point for recognition of practices or standards. Three industry submitters raised the UK-New Zealand Veterinary Agreement as an illustration of strong mechanisms already agreed between the UK and New Zealand supporting regulatory coordination and alignment. Two industry submitters requested streamlined customs administration procedures and flexible, simple and transparent approaches to Rules of Origin in order to minimise costs and foster global value chains. Individual submitters referred to more efficient processes for customs clearance allowing New Zealand and UK product to reach both markets more quickly, reducing overall costs for exporters, importers and consumers.

A UK/NZ FTA should include mutual recognition of medical technology standards, conformity assessment and good manufacturing practices e.g CE Certificates.

Medical Technology Association of NZ

NZAPI requests MFAT ensures provisions of a NZ-UK FTA meet the obligations of the international agreements that our countries are signatory to, particularly in regard to trade and sanitary and phytosanitary (SPS) requirements.

NZ Apples and Pears Inc

It would be advantageous for New Zealand to fast track imports and exports between here and the UK through a separate customs area at both ends to enable quicker turnaround times for both sides

Have Your Say submitter

Sustainable development

A significant proportion of individual and industry submissions referred to the importance of incorporating environmental protections and standards within an FTA with the UK. Many submitters asked that the Government consider including provisions which protect New Zealand's unique eco system and environment. Particular mention was made of climate change. Both individual and industry submitters raised the importance of maintaining New Zealand's internationally recognised biosecurity standards to protect New Zealand's delicate eco system. One industry submitter noted that these high standards both protected the environment, and were beneficial in promoting market opportunities through having world renowned biosecurity standards.

Promoting sustainable development across key areas such as the environment and labour will result in a range of benefits that support biosecurity, conservation, appropriate use of finite natural resources, and the atmospheric domain.

Horticulture New Zealand

Agreements must be coherent with climate policy and support efforts to reduce activities that cause climate change.

NZ Medical Association

Any UK exports to NZ must recognise our unique biodiversity and respect our biosecurity rules. [...] This FTA should not weaken NZ's biosecurity standards/requirements.

Emailed individual submission

Māori interests

There were a number of issues raised by submitters surrounding the impact of an agreement on Māori and Māori customs and rights. These included ensuring New Zealand could uphold its Treaty of Waitangi obligations, protecting taonga, and working to ensure the Māori economy would benefit.

Benefit Māori economy and global indigenous economy

Four industry groups and one Māori collective submitter asked that the New Zealand Government include provisions for fostering Māori economic growth in a UK trade agreement. One industry submitter pointed out the correlation between the dairy sector and the Māori economy with 10% of its industry's assets being Māori owned. Another industry submitter specifically proposed consideration of a chapter on Indigenous issues in a UK FTA similar to that within ANZTEC.

Treaty of Waitangi provisions

Two industry groups, two individuals and one trade union underlined the importance of provisions in a UK FTA enabling the New Zealand Government to uphold its Treaty of Waitangi obligations to Māori. One trade union was of the view that New Zealand's standard Treaty of Waitangi exception requires revising and strengthening.

Protect Māori intellectual property, taonga and customs

One industry group, one business and one Māori collective submitter raised the protection of Māori rights and traditional knowledge in any trade agreement.

With each agreement New Zealand is party to, we should always strive for inclusion of comprehensive and progressive chapters, including recognition of the Treaty of Waitangi.

Horticulture New Zealand

In theory a trade agreement between Maori and the UK should involve teaching all of us how to maximise profits by following principles of tikanga, morality and justice.

Patuharakeke o Te Parawhau

Inclusive trade provisions

Many submitters were concerned to ensure that the benefits of trade were felt by all New Zealanders, particularly Māori SMEs and Māori women. Submitters commented that a UK New Zealand FTA should actively support small and medium sized exporters to compete on an international level.

Ensure wider New Zealand society benefits

Eight individuals, two industries and one trade union (representing 320,000 members) asked that the benefits of a trade agreement reach all New Zealanders. A number of individuals requested that an agreement work for wider society and not just big companies or investors. The two industry submitters concurred with this sentiment, noting the importance of incorporating inclusive provisions in trade

agreements.

Safeguard affordability of goods for New Zealanders

Ten individuals raised concerns about the price of both New Zealand produced and imported products in New Zealand compared to overseas. A number of individuals felt that more trade would increase competition and make products cheaper for New Zealand consumers. Others queried whether New Zealand should produce more and import less, or introduce other measures to ensure New Zealand products like meat, dairy and vegetables are affordable for New Zealanders.

Regional economic growth and SME Engagement in trade

Three industry submitters, one trade union, one business and two individuals advocated making trade more accessible for small and medium sized businesses, as well as fostering economic growth in regional communities.

Gender equity

The same bodies seeking inclusive provisions promoting Māori and SME engagement, also sought similar provisions advancing women's participation in trade.

Transparency of negotiations

Two unions, one industry body, one professional body and two individuals raised the importance of meaningful public engagement during trade negotiations. One trade union requested access to negotiating texts to the extent possible.

Human rights

Seven individuals, one industry submitter and one trade union referenced human rights. Individuals asked that trade agreements not compromise human rights standards in favour of business interests. The trade union submitter asked about whether trade agreements could limit the Government's ability to restrict goods from other countries on human rights grounds and expressed the view that the general exception provisions in the WTO trade agreements did not sufficiently protect human rights.

Inclusive regional economic growth, poverty reduction and sustainable job creation [are essential for being considered in a UK-NZ FTA].

NZ Public Service Association

From encouraging regional and Māori businesses to begin exporting, to empowering women in business, to supporting an environmentally sustainable export industry, we want to see all parts of New Zealand profit from a free trade agreement.

Wellington Chamber of Commerce & Business Central

Intellectual Property protection

Five industry and one business submitter sought fair, transparent and enforceable intellectual property protection in an FTA. Industry submitters referenced other free trade agreements as helpful starting points for negotiations with the UK, with particular reference to CPTPP. The music industry pointed out the critical function of copyright protection for its growth and sustainability with detailed figures in support. A pharmaceutical business strongly opposed the introduction of any form of patent term extension for pharmaceutical patents in New Zealand. Other specific industries mentioned with respect to intellectual property were: aviation, horticulture, plant seeds, wine and spirits. Some submitters sought fair processes for recognising both UK and New Zealand specialised products through use of geographical indications. However, one industry submitter warned about an approach that restricted use of generic names for products already widely in use in New Zealand. One individual asked for reduced intellectual property protections and technology patents.

On intellectual property, NZIBF supports approaches that are trade-enabling. The CPTPP is a useful model in that regard.

NZ International Business Forum

Movement of business persons

An industry body representing New Zealand's export, manufacturing and service sectors (from the dairy, meat, seafood, kiwifruit, software and service industries) asked the Government to seek improved visa access which would allow business people to temporarily move between UK and New Zealand to provide services. One individual called for more streamlined processes at the UK's border control for New Zealand business people.

In addition, ambitious outcomes should be pursued in services trade-facilitating measures relating to Mode 4 business mobility (e.g. business visas), commercial presence and mutual recognition of qualifications and licensing.

NZ International Business Forum

Investment

Six industry submitters, four individuals and one Māori collective submitter raised investment as an area of interest in submissions. All industry submitters supported increased investment (outward and inward) with the UK. Industry submitters highlighted the benefits of cross-border investment in increasing productivity and innovation, creating jobs and raising living standards.

On investment, NZIBF is a longstanding strong supporter of foreign investment in New Zealand and of provisions in our trade agreements which provide appropriate protection and certainty for foreign investors and investment (both inward and outward), while also recognising the Government's continuing right to regulate in the public interest.

NZ International Business Forum

Digital trade

Four industry submitters referenced digital services as a priority for inclusion in an UK FTA. Industry submitters highlighted the need to preserve recognition of each other's data protection regimes to increase digital trade and reap the benefits and opportunities presented by the digital economy. One individual raised concerns about data security.

New Zealand and the United Kingdom have the opportunity to set new benchmarks for the digital economy, an area where global rules frameworks are lagging behind technology and commerce, but which is increasingly reshaping traditional business models. Central to these will be robust rules for the free flow of data across borders, including a prohibition on forced data localisation or other data flow restrictions, while also ensuring that legitimate objectives including privacy, consumer protection and cybersecurity are met in the least trade-restrictive manner. We note the EU's recognition of New Zealand's "adequacy" status for the protection of personal data, and would want to see an approach at least as ambitious put in place by the UK.

NZ International Business Forum

Mutual recognition of qualifications

One industry submitter and two individuals suggested that a UK FTA include provisions to support mutual recognition of professional qualifications.

I strongly believe that it is time for New Zealand and the different UK legal professional regulators to negotiate mutual-recognition agreements.

Have Your Say

Other concerns

Theme	Frequency raised
Visa access	36

Visa access

Free trade agreements are generally limited to specific categories of access for business people, such as intra-corporate transferees or specialist professionals. One industry submission raised this – refer to the section on movement of business persons above. In addition, 42 individuals and six industry groups raised improved access for other visa categories not typically covered by trade agreements (e.g. New Zealanders wishing to work, study and live in the UK more generally, particularly for young people). Concerns identified by the majority of these individuals were about reduced access over recent years to work visas, the increased costs of access and difficulties arising from the need to secure work sponsorship. Many submitters suggested loosening the age restrictions and lengthening the two year length of stay for the UK Youth Mobility Scheme (Tier 5) visa. Other submitters referenced the UK's General Work Visa (Tier 2) calling for specific exemptions for New Zealanders. Twenty-one individuals called for full free movement of people between countries. Five individuals felt New Zealand would benefit from skilled UK migrants to assist with New Zealand labour shortages,

with specific mention of the construction, health and education sectors. One individual advocated a UK working visa for New Zealand professionals.

There are many kiwis with family to the UK, and many UK residents with family here. Movement of people and residency should be easy. Similar to the ability for kiwis to live work and access services in Australia could and should be at the heart of any deal. It enables business to grow and trade to increase. Many kiwis would relish the opportunity to have work and residency rights in the UK, with many Brits also wanting the same thing. The transfer of skills, experiences will enrich NZ.

Have Your Say submitter

When I was younger NZ'ers had EASY work and residence access to the UK. These entitlements were largely lost with UK entry to EU. They need to be re-established. Young NZers get great experience and ideas being able to live and work in the UK.

Have Your Say submitter

Online poll results

The multi-choice questions in the online poll were designed to stimulate public discussion and engagement on trade policy and should not therefore be regarded as scientific. Nevertheless, the results from the online polls are included for interest and completeness.

Online poll questions

What should New Zealand prioritise in a trade agreement with the United Kingdom?

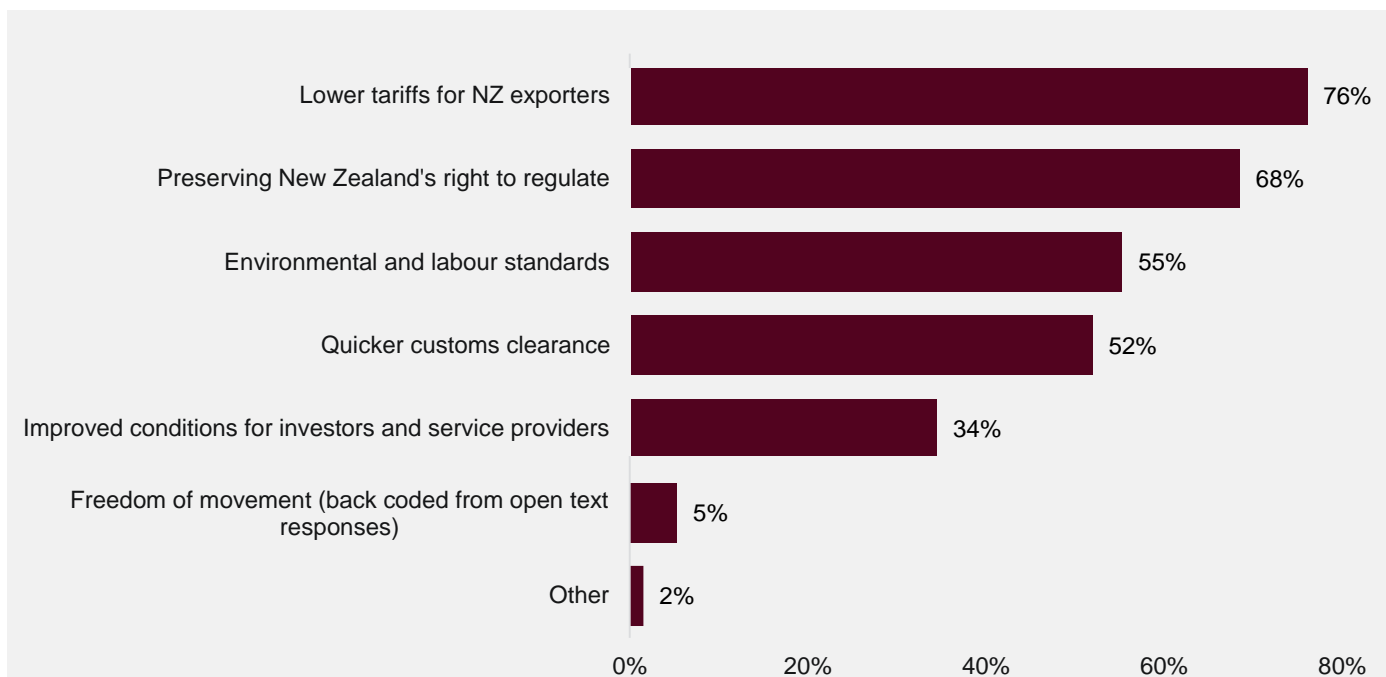


Figure 5 Answers to Q: What should New Zealand prioritise in a trade agreement with the United Kingdom?

Are there any changes that would make it easier to do business in the United Kingdom?

Following this question, submitters were given the opportunity to provide a written comment detailing what changes they would make.

Any additional comments made by those submitters who answered yes have been coded separately, and a frequency chart of key themes is included below. However, the number of these responses was limited, so it is not possible to make any in-depth conclusions based on them.

Theme	Frequency raised
FTA Benefits	5
strengthen Commonwealth ties	2
increase consumer choice	1
support for the rules based trading system	1
complete negotiations quickly	1
FTA Priority Areas	10
market access	4
removal of tariffs	3
removal of non-tariff barriers	1
sustainable development	2
protect New Zealand ecology and environment	2
intellectual property protection	1
movement of business persons	1
investment	1
mutual recognition of qualifications	1
FTA Concerns	1
concerns about UK protectionist approach and bid for 'special treatment'	1
Visa access	2

Figure 6 Are there any changes that would make it easier to do business in the United Kingdom? - Key themes

Annex 1

Submitter details

NZ industry group	Membership information
New Zealand Apples & Pears Inc	Membership includes all known growers in New Zealand of pipfruit for sale.
Dairy Companies Association of New Zealand	Members account for around 98% of the milk processed in New Zealand.
New Zealand International Business Forum	Members are business leaders from the dairy, meat, seafood, kiwifruit, software and services industries representing companies and sectors with a combined turnover of \$30 billion.
Medical Technology Association of New Zealand	Members supply approximately 95 percent of all non-pharmaceutical products used in New Zealand healthcare facilities.
Wellington Chamber of Commerce	Represents 3,400 members and three brands: Wellington Chamber of Commerce, Business Central, and Export New Zealand Wellington.
Horticulture New Zealand	Represents 5,000 commercial fruit and vegetable growers. Supported by 11 other horticulture industry groups.
Aviation New Zealand	Over 300 aviation business members and 1360 stakeholders.
The Corporate Taxpayers Group	A group of over 40 of New Zealand's largest businesses.
ExportNZ	2,000 members across two brands.
Federated Farmers of New Zealand	Represents 13,000 farmer members
New Zealand Winegrowers	Represents approximately 1,400 grape growers and wine makers.
Recorded Music New Zealand	Represents the interests of New Zealand record companies, distributors and over 3000 individual recording artists.
New Zealand Plant Breeding & Research Association	Represents a group of seed and research companies engaged in the development and marketing of plant intellectual property for the New Zealand arable and pastoral sectors
Beef + Lamb New Zealand Ltd	Farmer-owned, industry organisation representing sheep and beef farmers.
Meat Industry Association of New Zealand Inc	Represents sheep and beef processors and exporters operating 60 processing plants and employing over 25,000 people.
New Zealand Grain and Seed Trade Association	Represents breeders, processors, and marketers of seed products
Indigenous Taiwan Aotearoa New Zealand	Business Council set up to increase indigenous trade between Aotearoa New Zealand and Taiwan

NZ Trade Union	Membership information
New Zealand Council of Trade Unions - Te Kauae Kaimahi	320,000 individual members across 27 affiliated unions.
New Zealand Public Service Association - Te Pūkenga Here Tikanga Mahi	75,000 individual members.

NZ Professional Groups	Membership information
Chartered Accountants Australia and New Zealand	Professional body comprised of over 120,000 members
New Zealand Medical Association	Pan-professional medical organisation representing the collective interests of all doctors.

NZ Business	Information
Fonterra Co-operative Group	New Zealand dairy company
Douglas Pharmaceuticals Ltd Pacific Aerospace Limited	New Zealand pharmaceutical company New Zealand aircraft manufacturing company

UK Industry group	Information
National Sheep Association	An organisation that represents the views and interests of sheep producers throughout the UK
United Kingdom Accreditation Service	Recognised by the UK Government for the accreditation of organisations providing calibration, testing, certification, inspection and medical diagnostic services

Māori Collective	Information
Patuharakeke o Te Parawhau	Patuharakeke are a collective Māori group from the far north.

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