

Ministry of Justice

Proactive release of material related to submissions on proposed changes to political donation rules

Date of issue: 20 January 2023

Some information has been withheld on the basis that it would not, if requested under the Official Information Act 1982 (OIA), be released. Where that is the case, the relevant section of the OIA has been noted and no public interest has been identified that would outweigh the reasons for withholding it.

No.	Document	Comments
1	Consultation submissions (277) – members of the general public (275) and various targeted stakeholders (2)	<p>Some information withheld under section 9(2)(a) to protect the privacy of natural persons.</p> <p>Some of the organisations who provided submissions have already published their submissions online, which are not included in this proactive release. The organisations and their submissions are listed below:</p> <ul style="list-style-type: none">Chartered Accountants Australia & New Zealand (CAANZ) - charteredaccountantsanz.com/news-and-analysis/advocacy/policy-submissions/submission-on-consultation-on-political-donations-reformsNational Māori Authority - maorieverywhere.com/single-post/call-for-political-donation-reform-consider-fully-funding-elections-to-avoid-corruptionTransparency International New Zealand - transparency.org.nz/blog/submission-political-party-donations-consultation
2	Consultation submission - Proposed changes to political donations rules (New Conservative Party)	Released in full.
3	Consultation submission - Proposed changes to political donations rules (New Zealand National Party)	
4	Consultation submission - Proposed changes to political donations rules (Social Credit Party)	
5	Internal File Note - Proposed changes to political donations rules (meeting with ACT Party)	
6	Internal File Note - Proposed changes to political donations rules (meeting with Green Party of Aotearoa New Zealand - Greens)	
7	Additional notes from the Green Party of Aotearoa New Zealand - Greens	Released in full.

No.	Document	Comments
8	Internal File Note - Proposed changes to political donations rules (meeting with New Zealand Labour Party - Labour)	Some information withheld under section 9(2)(b)(ii) to protect the commercial position of the company that is the subject of the information.
9	Internal File Note - Proposed changes to political donation rules (meeting with New Zealand National Party - National)	Some information withheld under section 9(2)(a) to protect the privacy of natural persons.
10	Internal File Note - Proposed changes to political donations rules (meeting with Outdoors and Freedom Party)	Released in full.
11	Internal File Note - Proposed changes to political donations rules (meeting with Sustainable New Zealand - SNZ)	
12	Additional notes from Sustainable New Zealand (SNZ)	
13	Internal File Note - Proposed changes to political donations rules (meeting with The Opportunities Party - TOP)	
14	Internal File Note – Proposed changes to political donations rules (meeting with Chartered Accountants Australia and New Zealand - CAANZ)	
15	BDO notes from meeting with External Reporting Board (XRB)	Some information withheld under section 9(2)(a) to protect the privacy of natural persons.
16	Internal File Note - Proposed changes to political donations rules (meeting with Professor Jonathan Boston and Dr Simon Chapple - Victoria University of Wellington)	Released in full.
17	Internal File Note - Proposed changes to political donations rules (meeting with Professor Andrew Geddis - University of Otago)	
18	Internal File Note - Proposed changes to political donations rules (meeting with Associate Professor Timothy Kuhner - University of Auckland)	

Response ID ANON-VKQE-1UVG-T

Submitted to Proposed changes to political donation rules in our electoral law

Submitted on 2022-01-17 09:46:46

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

It is good that these issues are being addressed.

However, they do not go far enough.

In this modern day-and-age it should not be onerous to develop a real-time register of all donations of any kind of any size to be available publicly at all times.

From: s9(2)(a)
To: electoral
Cc: s9(2)(a)
Subject: Please reform campaign contributions
Date: Thursday, 13 January 2022 5:30:21 pm

Kia Ora,

Please eliminate 'access dinners' and other selling of ministers' time.

Please restrict donations to individuals (no organizations).

Please restrict the total of all contributions and individual can provide --- say \$2000.

Please establish a public fund from which election expenses can be allocated.

Sincerely,
s9(2)(a)



Response ID ANON-VKQE-1UWE-S

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-23 10:53:37

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes. Transparency is vital.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I agree with all proposals.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Transparency is vital. If anonymous what is to stop someone making 100 small anonymous donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I am keen on publicly funded election campaigns that remove the need for donations.

Response ID ANON-VKQE-1UVX-B

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-17 14:13:11

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I support the proposals. Political donations to me border on corruption. We must make things as transparent as possible to ensure people and organisations aren't attempting to procure undue influence.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think this is essential. The only reasons to justify anonymity in political donations are nefarious.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1U2R-1

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:31:57

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

These proposed changes do not go far enough. Only individual registered voters should be able to donate to political parties. Businesses, trusts, unions, foundations, NGOs, lobby groups, etc, should not be able to donate at all. No overseas donations.

i.e. if you can vote, you can donate.

There should also be a maximum donation permitted within a 12 month period. Say \$5,000 to \$10,000.

If political donations were outlawed altogether, it would not be bad thing. Even if each registered political party was allocated a modest amount of government funding just prior to each election.

Proposal 3, should be scrapped. The public need to know immediately when wealthy individuals or groups are donating large sums regardless of previous donations.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

If there are loopholes, they will be found and exploited.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

All anonymous donations should be illegal, period. No exceptions. And the onus on the political party to prove the identity of all donors, to prevent people donating under false names, etc.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Merely reporting isn't enough to clean up politics. Certain donations need to be completely outlawed.

Industries, corporations, unions, lobby groups, trusts, foundations, NGOs, charities, churches, etc, should not be allowed to fund political parties at all.

There should be a modest maximum limit on donations from wealthy individuals as well (e.g. \$5,000 to 10,000).

Proactive Release

Response ID ANON-VKQE-1U3H-R

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 20:19:02

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes. This will stop behind the scenes fraudulent behaviour.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Fraudulent behaviour behind the scenes by big business.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Implement them as soon as possible

Response ID ANON-VKQE-1U5H-T

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:25:20

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes for 1, 2 and 4. Not sure what 3 is about.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes to all.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

There shouldn't be any.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

These all seem good:

Capping political party donations to \$1500 per donor
Requiring political parties to identify donors for donations over \$100
Calling for all 'in kind' donations to be shared with the public
Stopping businesses from being able to donate

Response ID ANON-VKQE-1U5K-W

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:38:13

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I agree with 1, 2 and 4 but think 3 is contrary to the goal of transparency and openness. I don't understand the benefit of removing the rule and believe that much lower donations -- perhaps \$500 -- should be included.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I think donations should not be anonymous.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Allowing for anonymous donations is contrary to transparency, and so should not be permitted.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

All "in kind" donations to be shared with the public and if businesses are allowed to donate, that information needs to be declared to the public.

Response ID ANON-VKQE-1U5Q-3

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:34:02

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

There should be NO donations for politicians from corporations or churches or we will end up like america. All parties should get a certain amount of money from the country to run their elections. This may be a short term expense to the country but having corporations and churches dominating our elections will cost us a lot more with politicians becoming corrupt to a higher degree.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

NO. There is still room for corruption in politics. The government is suppose to work for the people not corporations or churches.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Corruption will skyrocket.
People will loss faith in their governments.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1U6K-X

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 16:08:06

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

In order to create a just democracy that is based in voting rather than financial power, I believe we need a ban on corporate donations, a ban on anonymous donations, and a cap on the amount any one individual can donate.

Response ID ANON-VKQE-1U23-2

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:20:52

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes. Absolutely.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Rather obvious!

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

No.

Response ID ANON-VKQE-1U24-3

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 15:36:11

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes. I believe reducing the limit, increasing frequency and including in-kind donations will close many loopholes that businesses or those with plenty of money can use to avoid being named as supporting particular parties. The identification of groups through these new disclosure rules should allow better transparency between donations and any potentially favourable changes the govt puts through when in power.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I agree that anonymous donations should be banned. It makes it simpler and also discourages people finding ways to split their money up to keep under a threshold to allow anonymity. It should also simplify reporting as political parties then just hold a single list and know to report all donations, rather than trying to obfuscate some but not others.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

My only concern is how you avoid people using trusts etc to hide who the actual donors are.

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 14:32:40

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

#s 1, 2, 4 are positive changes.

DO NOT REMOVE THE #3 REQUIREMENT.

MORE TRANSPARENCY NEEDED AROUND LARGE DONATIONS.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes to #s 5,6, and 7.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

The whole point of supervising and exposing political donations is to minimise the secret control of parties and of governance by private individuals and corporations and groups that want to secretly control government.

I would back a ban on anonymous donations to politicians, would-be politicians and political parties.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1U26-5

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 14:14:12

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I think the proposed changes are a good idea so that the influence of commercial interests can not outweigh what is best for the people. All proposals will do this 1-4 except 3 which is rendered a moot point by the others.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

The reported changes 5-7 will support compliance as it will be more difficult to use deceptive practices hiding possible influence.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations allow commercial and/or private individuals pursuing self interest through bribery of public servants (politicians) to succeed in subverting the greatest good to the greatest number - utilitarian social well being is the right function of government and the natural outcome of democracy when it has not been subverted by the needs of the Fortune 500.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

About time.

Response ID ANON-VKQE-1U29-8

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:53:21

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I agree and encourage all of the above changes to offer more transparency to what appears to currently be a very easily corruptible system.

When the people with the most affluence are allowed to offer large donations and influence political parties, it shapes the choices of our decision-makers in favour of those who already have more than everyone else. This creates an even greater imbalance of power in what should be a fair and democratic government system.

We need a political system that is fair and transparent and represents all of us, regardless of how much money we can donate to political parties.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I agree and encourage all the above changes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

The size of anonymous donations should be limited, as the fact that whether it is truly anonymous is very hard to determine, which then undermines the whole point.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1U64-7

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 17:39:19

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes but would prefer ALL donations are declared, even those below \$1500.

Anonymous donations should not be allowed.

This should apply to local body elections as well, and if donations to candidates are by political parties - they should also account for the money as per money laundering requirements. Eg Ginny Andersen Petone rent rort where Ginny rented from NZPFU as 'Petone Labour' then secretly sublet to herself as MP. The sublet cost was then submitted as an expense to Parliamentary Service. Labour Party did not know about it at all, nor did the NZPFU who was renting (in their minds) to 'Petone Labour' (but tenancy signed only by Ginny Andersen - Petone Labour did not exist).

Consider how your proposed framework would create transparency in that situation. Ginny declared donation to her electoral campaign as being from 'Hutt Labour'. 'Petone Labour' funds were not put through 'Hutt Labour' minutes.

Yes political parties should provide accounts publicly. As should individual candidates.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes in part. All donations should be named - anonymous donations should not be allowed.

Yes all financial statements, and a declaration stating original source of funds is from a legitimate source should be made by all electoral candidates.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Do away with them. Not transparent and being used to influence NZ and local body politics. Also to hide the true source of money.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Donations in kind should include use of buildings for campaigns, eg Ginny Andersen uses NZPFU office as her campaign base. It is not declared on her declaration - or it is deliberately undervalued so is below thresholds of reporting.

Use of a commercial room in Petone would be at least \$10 an hour, but yet her use of four or so hours a night 12 hours+ a week for four weeks is less than the threshold?

Any other candidate would have to use their own home or hire rooms to run their campaign. This gives her an advantage over other candidates who do not have access to backhanders or donated 'offices'.

The same office is also paid for by parliament rent so definitely blurred lines here!

Proactive Release

Response ID ANON-VKQE-1U65-8

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 19:41:24

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

3. Removing the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000

I support this. Ideally it should be lower than \$30,000, the limit should be set around \$10,000 to \$15,000.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I support banning anonymous donations at or above \$5.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

There should be an online platform that openly shows political donations. All reported data should be easily accessible. For example, NZ Transport Agency's Open Data Portal.

Response ID ANON-VKQE-1UB9-R

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 12:48:04

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, although removing the requirement to disclose the identity of very large donations seems like a step in the wrong direction

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I don't necessarily think these changes will have much of an effect on compliance; that depends more on the punishments and auditing procedures than anything else. No doubt the people responsible for the reports will find ways to obscure the information that is already obscured.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations under a certain threshold should be allowed; to keep in line with other proposed changes I'd say anything under \$1,500 should be allowed to be anonymous. (Also that amount is low enough that someone - possibly - wouldn't bother making multiple small donations to amount to a large donation)

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UBB-1

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 08:33:48

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UBZ-S

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 16:44:41

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes I agree, but note that that these changes re reporting on large donations.may address the transparency issues, but not that of influence so gained politically.

Maybe some disclosure of the background of the donors is needed so that their possible influence in particular sectors of policy or action can be detected.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Items 5m 6, 7 ... Yes but as per 1-4 that may offer a lot of info, but how will their possible influencing of politicians etc be traced/ known about ?

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Some form of letting voters know of who may be interested parties in some legislation or policy making, and likely to seek to bring influence to bear.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Just as stated we need transparency re donors, and some aid in 'watchdogging' who may be doing what to unduly influence decision makers.

Response ID ANON-VKQE-1UTK-V

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-15 12:23:48

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes. Transparency is key and will decrease the chance of corruption, particularly needing to disclose details and donations over \$1500

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes to all proposals. Make this business as usual. No trying to get around reporting

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Make everything transparent. No hidden agendas. With a high level of responsibility comes a need for ethical and transparent practice

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UTR-3

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-15 08:48:21

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1UU6-8

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 16:32:44

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Yes. I believe donations should be capped at \$1500.00 per donor. All donors over \$100.00 should be identified.

4 All 'in kind' donations should be shared with the public.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. The identity of all donors making donations over \$100.00 should be disclosed.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think anonymous donations should be banned so that the public are fully informed about who is possibly influencing political parties.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I think businesses, especially n'big' companies should not be able to donate and potentially use this to influence the decisions our politicians make. It would help prevent corruption.

Response ID ANON-VKQE-1UU9-B

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 15:39:11

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I think the proposal to change the reporting amount to \$1500 is excellent, but doesn't go far enough- I think all donations of any amount, including 'in kind' donations should have to be disclosed. New Zealanders deserve to be aware of who and what is influencing or aligning with our political parties.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Openness, transparency, and accountability. People should know who is supporting political parties

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UUJ-V

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 16:47:53

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Agree with Proposals 1, 2 and 4 as they increase transparency.

Disagree with Proposal 3. Donations of this size can significantly affect policy positions. Given the reduced time frame of an election period, they need to be disclosed as soon as possible for increased transparency.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Support Proposals 5, 6 and 7 as they increase transparency.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations can be coordinated by a single source, allowing a company or 'mega-donor' to circumvent the intention of the law.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UV4-7

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-18 18:43:39

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

They will be ineffective. The Labour party will continue to use art auctions to hide their donors.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

They will be ineffective. The Labour party will continue to hide donors by using art auctions and fundraising dinners.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

There should be no such thing as an anonymous donation.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Shame on you all.

Response ID ANON-VKQE-1UVC-P

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-19 23:06:29

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Agree with 1, 2 4 and don't agree 3

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

As SFO is investigating most parties it is obvious that there needs to be more transparency. Where do donations come from? How are auctions used to "gain", donations?

Response ID ANON-VKQE-1UW6-A

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 20:33:59

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Ban all corporate donations
2. Ban anonymous donations over \$100
3. Cap the amount an individual donor can donate

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

1. Ban all corporate donations
2. Ban anonymous donations over \$100
3. Cap the amount an individual donor can donate

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

1. Ban all corporate donations
2. Ban anonymous donations over \$100
3. Cap the amount an individual donor can donate

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

1. Ban all corporate donations
2. Ban anonymous donations over \$100
3. Cap the amount an individual donor can donate

Response ID ANON-VKQE-1UWA-N

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-23 11:27:14

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I think capping donations to political parties to \$1500 would make more a more fair system. Without it, the views of poorer people would end up not being represented to the same extent as the rich

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I think the reporting requirement should be lower still. Perhaps \$100

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

All "in kind" donations should be shared with the public

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Prevent businesses from donating to political parties. Businesses are not voting entities and the interests of businesses is money where as it should be the interests of people that are represented

Response ID ANON-VKQE-1UWH-V

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 10:59:26

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I think they would be an improvement but are still too generous

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I agree with the ban on anonymous donations

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UWX-C

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 09:51:32

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Ban all corporate donations.

Ban anonymous donations over \$100

Cap the amount an individual donor can donate.

Maintain the disclosure of donations over \$1500 and make them available on a public register and easily accessible to the NZ public.

I think in the interest of NZ citizens that all political parties should be funded from a tax payer political funding pool. Banning donations all together. Individual or corporates and country financial influence on political parties and their secret agendas would be eliminated.

New and existing parties would have a set minimum allowance to encourage and allow new parties to form. Similarly, political parties that represent the low economic groups could be shielded from financial limitations and finally have suitable funding to present their case to the general public.

The sway of national and international corporations and interest groups have an unfair and detrimental effect on the will of NZ citizens. Their influence detrimentally affects achieving policy change and the rate of that change.

Any other reporting that allows more transparency and openness is welcomed and greatly needed.

Political parties should never allow themselves to be placed in a position to provide political favours, just to obtain more finance for the said party. This only distorts legislation away from the will of the citizens it purports to represent.

Adequate and equitable PUBLIC FINANCING of political parties is the elegant solution to these corruptive forces.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes to points 5,6, and 7. I believe a lot of Finance influence exists in our political arena.

Any extra reporting to uncover the instigators of this influence is greatly needed.

The existing reporting does not serve NZ citizens well and allows the high possibility of corruption entering our political front.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Ban anonymous donation over \$ 100.00

This corruption has already resented itself on numerous occasions in the last couple of elections.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I have previously answered this reply on earlier question and have copied it to this question in case it has been missed.

In the interest of NZ citizens, all political parties should be funded from a tax payer political funding pool. Banning donations all together. Individual or corporates and country financial influence on political parties and their secret agenders would be eliminated. New and existing parties would have a set minimum allowance to encourage and allow new parties to form. Similarly, political parties that represent the low economic groups could be shielded from financial limitations and finally have suitable funding to present there case to the general public. The sway of national and international corporations and interest groups have an unfair and detrimental effect on the will of NZ citizens. Their influence detrimentally affects achieving policy change and the rate of that change.

Any other reporting that allows more transparency and openness is welcomed and greatly needed.

Political parties should never allow themselves to be placed in a position to provide political favours, just to obtain more finance for the said party. This only distorts legislation away from the will of the citizens it proports to represent. Adequate and equitable PUBLIC FINANCING of political parties is the elegant solution to these corruptive forces.

Proactive Release

Response ID ANON-VKQE-1UZ7-E

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 12:25:41

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Lowering the public disclosure threshold for donations to \$1500

Yes, transparency should be increased. A threshold closer to \$500.00 would be better. This would enable people on relatively modest incomes (particularly those in politically sensitive positions such as public servants) to enjoy anonymity. Donors of larger amounts should be named. This is to discourage a situation where political donations are given with the expectation of a reward in the form of policies and or decisions that politically favour the donor or the donor's "class".

2. Increasing frequency of donation reporting

This is definitely a good idea. It is in the public's interest to know who is making donations to political parties for the reason noted in (1) above.

3. Removing the requirement to disclose within 10 days the identity of donors giving over \$30,000

This requirement should only be removed if, as proposed change 2, all donations are reported in less than 10 days. If no provision is made for all donations to be reported more frequently, consideration could be given to the requirement to disclose large donations (i.e. \$30,000 plus) immediately i.e. in less than 10 days.

4. Requiring greater disclosure of in-kind donations

Clearly there is potential for such donations to be used to circumvent laws requiring disclosure of financial donations. In-kind donations should be subjected to the same disclosure requirements as financial donations.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. Introducing reporting requirements for non-anonymous donations under \$1500

-

6. Introducing public disclosure of party financial statements

Because political parties play an important role in the democratic process it is in the public interest to know the state of their finances, including how each

party's finances compares to the other.

7. Introducing reporting on candidate loans

There is potential for donations to be disguised as loans so this seems like a good idea.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Donors contributing more than \$500 p.a. should be identified in my opinion.

Furthermore, I believe consideration should be given to hard limits relating to how much may be donated by any one individual or organisation. For example, the maximum donation permitted per annum could be as low as \$2,000.

Serious consideration should be given to restricting or prohibiting donations from people who are not NZ Citizens on the Electoral roll.

I support any reforms which will improve transparency, and reduce the opportunity for those with above average capital and/or incomes to have an undue and/or corrupting influence on policy and laws in Aotearoa New Zealand.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Anonymous donations pave the way to undue influence and this undermines trust in democracy.

Governments which are influenced by the privileged, invite growing disillusionment, social instability and social unrest. Problems such as poverty, unemployment, violence and crime flourish. A growing number of families and individuals are facing overwhelming obstacles to securing their basic needs.

As the wealth and influence of the well-off with vested interests increases, disillusionment spreads.

The disparity between rich and poor is ever-widening in this country and unless we find a way to more evenly distribute wealth, seriously negative consequences will, in time, impact on us all.

Response ID ANON-VKQE-1UZF-W

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 20:55:57

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Yes, any donation of \$1,500 or more to a party OR any a particular individual within a party should be made public information.
2. Yes, any move towards greater transparency is critical in maintaining our democracy.
3. I recommend the 10 days be increased to 30 days to allow those involved time to prepare any returns or update any registers.
4. Yes, I would recommend that these requirements be scrupulous to ensure all details about in-kind donations are made public.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes to proposed changes 5-7. I recommend this information not only be available but easily accessible, to ensure all New Zealanders see the proposed changes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

A sincere thank you for proposing and considering these changes. They are essential to the sanctity of our democracy and especially important now, in the age of the climate crisis and the severe environmental degradation we are witnessing in New Zealand. It is critical in these uncertain times that we, as the New Zealand public, can trust our government to make decisions in our interest, and not corporate interests.

Response ID ANON-VKQE-1UZQ-8

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 09:44:52

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Number 3 is clearly not going to increase transparency.

You know what would increase transparency? banning donations entirely and publicly financing elections - they are little more than bribes anyway.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations should be banned.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UZT-B

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 16:42:31

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

It is MOST important to have all public donations kept low , \$1500 is okay. All donations must be notified , and if the donor is making repeated donations that should be noted, and a running total of the amount should be shown alongside it. When this total reaches a significant level , to be decided by the committee, that donor should be banned from further donations.

The total amount any party receives should be at a level that prevents the ability of any donor or group of donors to BUY INFLUENCE over Party policy and government policy and decisions.

Indeed parties should be limited in how much they can spend on elections and advertising between elections.

Those elected to office should have no other source of income, or receipt of gifts or other forms of remuneration, but their Member of Parliament salary . Salaries should increase to compensate for this.

The aim should be to prevent lobbying and buying government favour.

It would also be a levelling of the donation field if MPs were banned from gifts donations and other forms of income once retired from Parliament . This would call for a suitably compensatory retirement pension.

We might then get legislation and MPs which put the good of the country as a whole in first place.

To really sort the levelling up of representation, we need to change our vote for our MP to a form of proportional voting. We still vote for them using FPP and we know from past experience that can lead to capture by minorities.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I would vote for all of these changes

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations would come through bank accounts . These should be tagged and a running total kept of the amounts , as I outlined in my first note. Capped at an amount the committee would consider fair.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

We really need to get more variety of people into Parliament...too many groomed by parties. There are ways to do this as well as from the suggested controls of payment to parties.

We need to encourage more parties to develop so that we do not have this continual see-saw swing of the two party system we have embedded . As we saw in the last election , when one party implodes the electorate really has little choice but to have one all powerful party in control . That is not democracy. We need to change the voting system too if we want to get more parties and a fairer representation of the huge variety of voters out there who have no say because their vote is lost under FPP. We cannot get a properly working Mixed Member PROPORTIONAL Representation Government until we get rid of FIRST PAST the POST.

Proactive Release

Response ID ANON-VKQE-1UZV-D

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 10:58:11

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

No - point 3 does the opposite. It would hide significant donations and lead to political parties being able to hide their biggest influencers.

Other points, 1, 2, 4 are OK. Point 3 seems out of place.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes. All financials should be open and reported on.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Political donations should not be anonymous. Political parties become beholden to donations and the public should have the ability to view who the donors are and, by proxy, the influence they possess.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UDA-2

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-07 19:11:33

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1, 2, 4 improves transparency and openness since they allow the public to more visibly scrutinise and be informed about party donation sources, including visibility into donors who typically donate \$1,500~15,000.

3 reduces transparency and openness since major donations may be related to an event of public significance, and delaying prompt disclosure might mean such relations are obscured or lost.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

6, 7 supports compliance as the public can notify the Electoral Commission if, after reviewing a financial statement or loan, the public suspects something. Public scrutiny encourages better compliance as illegal or questionable activity are harder to hide.

5 is too difficult to comply without a reasonable lower limit, as recording each miniscule donations (\$200 or less) manually would be extremely tedious.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

1. Privacy concerns regarding storage of (potentially) personally-identifiable information:

- if easily accessible to public, such information can be used to harass, discriminate or bully small donors, potentially reducing civic participation.
- if easily accessible to public, such information can be used by companies to target influence political views for selfish gain, as well as indirectly capture industry regulators. The same applies to state actors and national defense.
- information should only be accessible by government, media/research institutions or OIA requests.

2. Donation reporting process:

- reporting should be thoroughly safe against tampering, if not already.
- should be easily implemented by any party, with both digital and non-digital methods, if not already
- if digital reporting, an official government app could be created with software open-sourced under a strong copyleft license, for parties to incorporate into their own non-profit apps if needed.

3. Cross-party civic education strategy should be prepared beforehand so donors understand why parties are no longer allowing anonymous donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Penalties for failing to comply should be proportional to donation amount, instead of a flat penalty.

Consider a soft cap on overall donations for each party, e.g. \$3 million, to check against rampant political spending. After \$3 million, donations can be split between the intended party and the Electoral Commission to fund election administration — scaling administration resources with increasing compliance enforcement costs.

Perhaps a 'New Party Starter Fund/Loan' so eligible new parties can get a kick start to election preparation, while ensuring new parties abide by all election rules as a condition of eligibility.

Proactive Release

Response ID ANON-VKQE-1UDC-4

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-09 14:13:02

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Re #1: Lowering public disclosure threshold for donations to \$1500 for parties would certainly increase transparency. It makes sense to align party donations with individual candidate donations. It's important for the protection of our democracy and trust in the system (as well as being within the public interest) to know who is making donations, who they are making them to, and how much they're donating.

In terms of #4: Transparency around in kind donations is absolutely appropriate. Especially when people are donating their specialised skills/expertise which they charge a premium for on the open market. This goes to supporting #1 too as donating goods and services rather than cash is within the public interest. It's important to know who is trying to influence our democracy.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Re #5: people getting around the rules by making repeated anonymous donations under \$1500 is a very real concern and therefore makes sense to close this loophole. If we're able to see it and report on it, then that can only be good for trust in the system and prevent bad actors.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I'm concerned about people funneling their donations through organisations as well as making repeated anonymous donations under the \$1500 threshold to ensure they aren't subject to public disclosure.

The public has a right to know who is supporting which parties and candidates, regardless of the amount of the donation.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UDR-K

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-06 18:10:39

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I support proposed changes hopefully it will help to achieve transparent democracy.
Each party should have transparent bank account which public can view, donors should be visible as well.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Reporting should be on all donations of any value.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

All donations must be public. Politicians are public people, lobbyists must be public as well. Transparency = democracy.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Heavy fines and punishment should be introduced for both party and responsible person.

Response ID ANON-VKQE-1UXR-7

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-15 13:23:59

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I support all the proposals.

- Allowing donors to donate large amounts anonymously is antithetical to the rule of law and democratic norms. Lowering the threshold will increase openness and transparency by making the identity of significant donors discoverable. If this reduces the money available to political parties, so be it: there is already far too much spent by parties on advertising and technology targeting voters
- Donation reporting should be routine and regular and political parties should be fined for not making reports on time or in full. The leader of the party, not a person in an administrative role, should be required to sign-off on the accuracy of each report.
- All in-kind donations should be disclosed: name of donor and recipient, date, description and estimated monetary value of the donation. If full details of in-kind donations is not made, what is to stop a donor purchasing \$100,000 of TV advertising and donating it to a political party without disclosure?
- Parties should be required to make disclosures wherever required to maintain the spirit of the law: if there is any uncertainty as to whether the disclosure criteria are or are not met, they should be required to disclose the donation. This is to avoid non-disclosure on technical or definitional grounds

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Proposals 6 & 7: both these proposals will help support compliance by making information available to the public that is not currently available. As much as politicians protest that money doesn't buy influence, there is no doubt that it does - human nature works this way. When this information is publicly available, politicians will find it easier to push back against donors who explicitly or implicitly expect the politicians to make decisions in favour of the donor that are not the best decision for society as a whole.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

- If donations are permitted to be anonymous under a certain level, there will no doubt continue to be large donors who split donations into smaller chunks. This suggests anonymous donations should be banned.

- If anonymous donations are banned, then it is likely the level of donations to political parties will fall. This would not be a bad thing. It just means parties will need to work harder to secure donors who are prepared for their identities to be known. There is nothing anti-democratic about this.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

It is clear from looking at the US and the UK, that high levels of donations to political candidates and parties have extremely negative effects - driving increasing partisanship and illogicality in political decision making.

Donations are one tool that individuals, lobbyists and interest groups use to secure outcomes that would otherwise not eventuate. It is of course very difficult to provide hard evidence of this, but it is undeniable to any reasonably observant person.

Covered under the donation rules should also be "fund raising" events, such as dinners and events where people can effectively buy access to politicians. These events should be banned; if not banned, all attendees names and the amount any paid to attend should be published immediately after the event.

Proactive Release

Response ID ANON-VKQE-1UXX-D

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-15 14:44:57

Have your say

Tell us about yourself

What is your full name?

Name:

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I do not think all 4 of the changes above are adequate as they don't go far enough.

Every dollar of donation should have the name of the donor named and be disclosed to the public before an election no matter how that dollar comes into the parties hands. ie through an auction of items, Whoever brought the items or gifts should be named.

No loans should be allowed to run a campaign unless it is disclosed who is paying back the loan amount before an election.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

No, again they do not go far enough. no donation should be allowed to be anonymous.

There should be total transparency in any financial dealings of political parties.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

That anonymous donations should not be allowed. Where ever money comes into the hands of a political party the public has a right to know about it. These people are supposed to be representing us, I want to know if they are instead representing the person who is giving them money.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Our democracy is at stake by politicians being brought and paid for by the highest bidder.

From: s9(2)(a)
To: [electoral](#)
Subject: Political donations rules
Date: Tuesday, 25 January 2022 7:30:34 am

Hi,

I want to make my views heard that this law and changes is highly unethical and another step further away from a fair clean country. You must know this. I believe on the below 3 points to give transparency and equality to this nation.

1. **Ban all corporate donations**
2. **Ban anonymous donations over \$100**
3. **Cap the amount an individual donor can donate**

With a government already corrupt we don't need more reasons for bribery and sell outs.

s9(2)(a)



out of scope

From: s9(2)(a)
Sent: Thursday, 13 January 2022 12:21 pm
To: electoral
Subject: Electoral donation reform.

I support the proposed reforms to political donation regulations because I transparent democracy is dictatorship.

s9(2)(a)

Proactive Release

out of scope

From: s9(2)(a)
Sent: Friday, 21 January 2022 9:04 pm
To: electoral
Subject: Submission on political donations

Dear Justice Dept,

I would like to say that I do not think Corporate sponsorship donations should be anonymous at any amount and should be restricted to \$30,000.

As well I think any donations above \$250 should be public and the donor listed.

I think this level of publicity and acceptance for political donations would contribute to a healthier democracy.

Thank you for considering these points.

Yours truly,

s9(2)(a)

Sent from [Mail](#) for Windows

Proactive Release

Response ID ANON-VKQE-1UW2-6

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 10:27:47

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

where the donation may be from a person of interest , that could be from criminal organized states. Yes Transparency on all levels

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes reporting donations by anonymous donations gives the public alot to view on which country or groups the donation is from , no 5, the oxymoron has levels that many donations could be frm 1 source.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Criminal elite has a damaging effect on all economic conditions on any country bribed

Or taken advantage of by a select elite class of crimes pupertrated around the world

Yes Transparency is important to weigh in an educational mind of younger generations that believe they can try to improve the status of the household & community they grew up in. Transparency means they those that hide under there veil of secrecy can no longer live in the illusion of power.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

my expertise in any political field is not great at all. I had to re-read what a donation is & still in the dark a lil. But if it is Justice asking then Justice will be answered. No matter for now how it is related. Transparency will improve the overall view of this dialog , we can get pass the Red Tape . We can see how the relationship is between the charity & the party. We can stop all future works frm being blowing over budget

Response ID ANON-VKQE-1UZD-U

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 21:47:20

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1, 2, and 4 seem like good changes to increase transparency.

3 seems like it does the opposite.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I support the proposed changes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Allowing anonymous donations undermines the transparency of our democracy. I support this change.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

- Cap political donations per donor per year, perhaps as low as \$1500.
- Require parties to identify donors over \$100
- Require all 'in-kind' donations to be shared with the public.
- Stop businesses from being allowed to donate.

These changes will further increase the transparency and democracy, including that political will could no longer be 'bought'.

Response ID ANON-VKQE-1U6Y-C

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 17:44:47

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Unless I am misunderstanding it, Item 3 seems to have an obvious "loophole" which enables a handful of extremely wealthy donors or organizations to pump endless amounts of money into campaigns without the donation(s) being disclosed. One would simply need to first donate \$30,000.01 to the campaign of your choice and report it, and then pump millions into the campaign. All the commission and the public will be able to infer is that entity's total sum of donations within the 12 months following likely exceeded \$30,000 until the 30th of April, and by then an important election may well be over.

This is disastrous and would ensure that largest donors deserving the most transparency and openness go undisclosed for almost an entire year, and can heavily lobby and influence our political system and subvert democracy; the will of the people; with money until it is too late for the public to respond.

Items 1, 2, and 4 on the other hand would appear to improve transparency and openness. However they do not outweigh the opacity and secrecy item 3 would introduce into the campaign financing system.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Compliance is determined not just by the complexity of the law but also enforcement. If well enforced with serious consequences, such that the potential benefits multiplied by the odds of not being caught are massively overshadowed by the costs of being caught multiplied by the odds of being caught, these changes should not impact compliance in the slightest. Anyone perturbed by the changes and who no longer wish to comply would find it far more worthwhile to simply not donate.

If these laws are poorly enforced and / or with lax punishment, they could marginally reduce compliance, but at that point compliance would already be low enough to be a serious problem regardless. Therefore I would not even consider compliance when worrying about these three proposed changes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

A complete ban on anonymous donations would void most secrecy when it comes to party affiliation, and would lead to increased amounts of politically motivated coercion or harassment.

On the other hand, it would make it harder for individuals to influence politics by bribing politicians with large "anonymous" donations unbeknownst to the commission and the public. Donors can currently skirt rules and inform only the recipient politicians they intend to bribe that they paid an "anonymous" donation via banking statements and similar documents.

If this is a serious issue that is difficult to balance the pros and cons, it might be better to perform a complete overhaul of the campaign financing system, such as banning typical donations and relying solely on a donation voucher system used in places like Seattle that ensures that the one person, one vote rule applies to party's policy via campaign finance as equally as the actual election vote.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1UXC-R

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:14:17

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes - politics should be about ideas, not who can get the biggest donations

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes, people should know how parties are financed

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I see no reason donations should be anonymous, other than small donations that may be given in person should not require the burden of admin

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:02:51

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Agree.
2. Agree
3. Any donation should be considered a potential bribe. Removing the requirement to disclose donations over \$30,000 within 10 days is therefore unacceptable.
4. All contributions should be declared, especially 'in kind' contributions. See 3.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. Agree
6. Agree
7. Agree

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

No donations should be anonymous.

Anonymous donations may appear so on the books, however how anonymous are they in practice? One or both parties may want to keep a large donation under the radar and agree with recipient/donor to make multiple small 'anonymous' donations. Again corruption comes to mind...

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Any existing or new loans, and access to share trading and/or active share trading by parties or any individual decision makers, should need to be declared.

Proactive Release

Response ID ANON-VKQE-1UAH-6

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-21 19:45:23

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Self

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I am not a politician and never will be.

I love my country New Zealand, and believe that we are truly blessed with our nation of wonderful people.

I am totally against lowering donations from companies to political parties.

I am also against giving a threshold on donations.

Some companies are not all about profit but are also concerned about the way this present government is stuffing up this country.

Some of these companies may jeopardies their future by having their names advertised, because this government would not take lightly to any contradiction.

We do not only have climate change issues, but Health, education, poverty, crime, and housing problems.

This incompetent government has not only done nothing to ease these problems, but has wasted the tax payers money on non essential spending.

They are the ones that have been donating money to try to get votes. I can go on about how they have dished out millions of dollars to try an get favour.

I hope that people will donate as much money to any other party other than this government.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

No, people will have no say, and there needs to be a voice that can improve this country

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

There should be no problem with anonymous donations

Why must you announce someone's name and make it illegal to anonymous

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1UT9-A

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-15 14:06:38

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

These are largely good but do not go far enough.

We need:

Capping political party donations to \$1500 per donor. This would allow people to support parties but also make sure that no one person exerts too much influence on political party decision making.

Requiring political parties to identify donors for donations over \$100. Basically no one drops more than \$50 in a Koha jar. This would allow for small scale non identified donations so small parties are not penalized while ensuring maximum transparency.

Calling for all 'in kind' donations to be shared with the public. Donating a rental space or vehicle should be declared.

Stopping businesses from being able to donate. No business should be able to hold large financial influence in politics. If individuals want to donate that is great.

Frankly I'd be of the view that all elected political parties should receive the same amount of government funding and only use such funds for campaigning. I genuinely do not believe that any elected party should be able to campaign using donated funds as it turns campaigns into a contest of "who has the most donors?" as opposed to "who has the best ideas?" Sadly, I don't imagine National or Labour would agree to this.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

No donations above \$100 should be anonymous.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1U55-5

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:00:29

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Increased reporting on monetary and in-kind donations is important to ensure our democracy is fair, transparent, and representative. I support proposals 1, 2 and 4. I only support proposal 3 as a technical change, where the disclosure of large donations is captured by increased reporting requirements for all donations. I think the requirements to promptly disclose large donations should be protected to ensure accountability and to give other parties opportunities to raise corresponding amounts as needed.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I think all of these proposals (5-7) help support compliance. I would also support reporting of all donations over \$100, including anonymous donations. Loans to candidates and to parties should be disclosed, including loans from trusts and other corporate bodies, with the possibility of excluding loans from registered banks made on typical commercial terms. The aim is not to restrict access to finance when needed but to capture disclosure of loans used for campaign management.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I oppose anonymous donations in principle. The voting public are entitled to know how political parties are funded, and importantly if particular interests might be seeking influence through financial support. This could be through donations from individuals or corporate bodies including trusts, clubs and societies, businesses or charities. I would like to see all donations disclosed and publicly reported.

However, low levels of anonymous donations, such as cash donations made at public events, up to \$100 per donor, would be onerous to report individually but could reasonably be reported and disclosed as a total for each event.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I'd really encourage a public campaign to seek feedback from as broad a sector of society as possible. I'd love to see direct approaches to iwi groups for input. This isn't going to be a headline grabbing issue, but it's vital to protect against disenfranchisement. This is foundational stuff for our democracy and it's so important to get right for all of Aotearoa New Zealand. I support pushing out the closing of submissions by several months to carry out a public engagement campaign.

Proactive Release

Response ID ANON-VKQE-1UD5-P

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-07 22:10:19

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, support 100%

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes, support 100%

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

not sure I'd support a ban, but I'd support a very low threshold of say \$100, and for any online site for donations to require a donor under the threshold (say \$99) to declare that they'd made no other donations to that Party.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

please get on with it in time to get this sorted for 2023. Need to address the over-priced 'wine auction' type scenarios as well, to make sure there is full and prompt disclosure regards who's investing in politics in that way.

Response ID ANON-VKQE-1UZX-F

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 23:49:03

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Proposal 3: Do not remove this requirement. If this requirement were to be removed donors of large sums of money could stay anonymous.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

These 3 proposals make sense.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I support a ban on anonymous donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Ban all corporate donations to limit how large companies can influence decisions made by politicians.
For the same reason, cap the amount an individual donor can donate.

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 22:24:01

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Fully support 1), 2) and 4.

Not clear what 3 means - since proposal would make it impossible for donations of \$30,000

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Support 5 and 6 in interests of transparency.

Re 7, not be sure. Does this relate to personal loans? That seems a bit restrictive.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Crucial to ban anonymous donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Pleased to see this murky area being cleaned up. A world leader, I suspect.

Response ID ANON-VKQE-1UVQ-4

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-17 16:53:42

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I do feel disclosure of any and ALL donations would improve transparency, as donations to political parties is high-risk for corruption. However, the third point of "Removing the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000" does not help, as without replacing it with more strict requirements would appear to allow individuals to donate large amounts of money with less oversight.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

All of this would help, but at a minimum any and all political donations should be publicly disclosed, and/or capped to a small amount per person.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

My position is that any and all donations should be disclosed and/or capped. Capping or stopping donations to political parties is ultimately the only way to prevent corruption through donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

New Zealand should move to purely public funding of elections and BAN ALL POLITICAL DONATIONS. Political donations can be abused and manipulated to allow for corruption and bribery. A perfect example are the 'pay-to-play' dinners that the parties have, that allow people access to politicians, allowing them to influence policy (corruption)... If political donations are not banned, they should be capped at \$100 per person per election cycle, with political "paid plate dinners" being banned.

out of scope

From: s9(2)(a)
Sent: Thursday, 13 January 2022 4:50 pm
To: electoral
Subject: Submission on Political Donations

I wish to submit for checks to be made to our laws so that the wealthiest few do not have a stronger voice on issues that political parties represent through political donations.

Instead I want to advocate for a fairer and transparent process that represents all of us not just strong vested interests.

To ensure this I support the following;

- Capping political party donations to \$1500 per donor
- Requiring political parties to identify donors for donations over \$100
- Calling for all 'in kind' donations to be shared with the public
- Stopping businesses from being able to donate

I also want transparency to ensure that the situation where wealthy donors could evade transparency by making multiple donations under a certain threshold is not allowed to continue into the future

Regards

s9(2)(a)

[Send a submission now using the online feedback form.](#)

Sent from [Mail](#) for Windows

Response ID ANON-VKQE-1U6H-U

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 15:40:00

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I feel keeping it anonymous encourages lobbying.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UB3-J

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 09:21:34

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I think all the proposals except proposal 3 would improve transparency and openness, as all of them require more reporting of donations rather than less.

I do not understand how proposed change 3 (Removing the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000) could ever be described as improving transparency. It reduces it. I oppose change 3

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I think all the proposed changes would support transparency. I am not sure how the changes themselves improve compliance. The existence of any new reporting requirement on its own does not mean it will be complied with. Only some kind of financial or other penalty to the party or individual who does not comply with the proposed new reporting changes would ensure compliance. I support the new reporting requirements, and suggest they be accompanied by some kind of penalty for noncompliance.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

There is no place for anonymous donations in politics. The only reason that an individual or organisation would not wish for their political donation to a party to be known about is if they fear reputational damage from their association to that party - i.e. that they want to support a publicly unacceptable or distasteful political position whilst simultaneously being shielded from the consequences of that support. This should not be possible or allowed. Actions in the public sphere must have consequences. If an individual or organisation does not want their political views known to the public, they can choose not to donate at all. All political donations by individuals or organisations of either money or in-kind benefits should be recorded and should be permanently-available publicly-accessible records.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I would like to request that the following changes are also added to the political donation rules.

- All political party donations should be capped at \$1500 per donor per election cycle. This would apply as a total amount over the entire election period, so repeated donations of lower than the cap amount would breach the rule if the total amount was more than \$1500. This would prevent a small number of wealthy individuals or organisations from having undue influence over a party, and encourage parties to seek financial support from larger numbers of the less wealthy - an inherently more democratic behaviour.

- If anonymous donations are not forbidden entirely, political parties should identify and place in the public record all donors giving donations over \$100. As most financial transactions are electronic now, this would not present an undue compliance burden to the parties and would increase transparency.

- Similarly, all 'in kind' donations (such as cash for access dinners, or donations of goods for auctions) of over \$100 should be identified and placed in the public record.

- Businesses should be banned from making political donations. Businesses have greater wealth than most private individuals, so are able to donate larger sums. Therefore allowing businesses to donate inherently gives them much greater influence over political parties than individuals. This, coupled with the innate bias of businesses to value law changes that benefit them and their profits above benefits to society, means that allowing businesses to donate to political parties is inherently detrimental to good societal governance. There is no benefit to society in allowing a single sector with narrow interests to have an outsized influence on that society's governance. In fact, it is antidemocratic.

Proactive Release

Response ID ANON-VKQE-1UTW-8

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-15 14:46:28

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I think we should know who money is coming from. Transparency may help avoid too much corruption. Sorry I'm not up with all the changes but donations from business can sway decisions and that isn't helping equity issues which are getting worse.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

We need systems that don't allow hidden money.
Money can influence decisions.

All elections cost money.
Money is spent only once.
Spending money often creates emissions and other pressure on the environment.

We need money for other stuff too.
There is a limit for the money spent on health, on nature, on conserving water.
There should be a limit for the money spent on elections.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

We need systems that don't allow hidden money.
Money can influence decisions.

All elections cost money.
Money is spent only once.
Spending money often creates emissions and other pressure on the environment.

We need money for other stuff too.

There is a limit for the money spent on health, on nature, on conserving water.
There should be a limit for the money spent on elections.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

What do we want? I want equity. I want a healthy planet. These are best served by rules that support the least well-off.
I want wellbeing. And think is best served by systems that allow strong debate and hearing each other in controlled situations.

Proactive Release

Response ID ANON-VKQE-1U22-1

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 14:45:01

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes.

1 it will make it easier to spot doners doing multiple donations as they will have to spread them even further, It also opens up and shows donations for the "Average" doner.

2 Gives a better idea of how frequently parties are being influenced by their doners especially when certain issues are raised. This will help identify bought politicians and parties.

4 I feel would refinitely increase transperancy around who is influencing politics in NZ

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think banning anonymous donations entirely is the most effcent way to show transparency in NZ politics.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UZ1-8

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 15:11:00

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Political parties should only be allowed to take donations from individuals not businesses. When business interests are at stake in government decisions it leads to serious conflicts of interests. Significant amounts from anyone should always be disclosed to the public within a reasonable timeframe, such as 10 days, \$1500 or higher is an appropriate threshold.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I can see how these will improve reporting.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think the amount is crucial. I believe individuals should be allowed make anonymous donations but for an amount under a threshold, somewhere in the region of \$100 or less to remain anonymous.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I am concerned to see proposed changes on donating to political parties not addressing the main issue of conflicts of interest affecting government decisions. It is clear business have vested interests in political parties for their own financial gain and this often puts politicians over a barrel on many important issues.

Response ID ANON-VKQE-1UVP-3

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-18 11:22:20

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Lowering public disclosure threshold for donations to \$1,500 for parties

--I think that NZ political parties should follow the practice of other democracies and declare all donations. The secrecy about donations is exploited by bad actors. Even better, would be if our political parties were fully subsidised by taxpayers, as they are in the Netherlands.

Increasing frequency of donation reporting

Agree with this measure.

Removing the requirement for parties to publicly disclose, within 10 days, the amount donated, and identity of the donor, in cases where the donor has donated over \$30,000 within the previous 12 months

Transparency is crucial. Parties must keep proper records of donations, regardless of the amount.

Introducing requirements for parties and candidates to disclose more details about in-kind donations.

All forms of subsidy and income in kind must be declared by political parties. Not to do so is a political risk. For example, if an individual is paying for a staffer in an MP's office, this is a form of political donation and should be declared.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. Introducing reporting requirements for non-anonymous donations under \$1,500

Yes, agree with this proposal.

6. Introducing a requirement to publicly disclose financial statements

Yes, an essential change. More transparency equals stronger democracy.

7. Introducing a requirement to publicly report on candidate loans.

Yes, this is a form of income and must be declared.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

All donations should be transparent. We have seen in the case of donations to the National Party via the Zhongshan Association that up to ten anonymous donations adding up to \$100,000, with funds originating in China, were channelled via donations that were under public reporting amounts.

Anonymous donors should also not be allowed to hide behind NZ-registered companies. National Party MP Todd McClay's Rotorua Electorate account received a \$150,000 donation from a non-NZ PR foreign citizen whose China business was part-owned by the Chinese state, via a NZ-registered company.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

NZ should provide state funding for political parties to prevent foreign interference in our political system. The Netherlands has an efficient system for this that would be a good model for NZ.

Proactive Release

Response ID ANON-VKQE-1UDE-6

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-07 16:47:54

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I believe that proposals 1, 2, and 4 will improve transparency and openness. I don't understand how proposal 3 would in any way help transparency, however, as the way it is written makes it sound as if donations over \$30,000 will no longer need to be disclosed or have the donor identified. If this is simply to clean up the legal language and they will still have to disclose all of the above information publicly, then I am understanding. Overall, I am in favour of political parties having to disclose all donations to the public, in order to ensure that the wealthiest among us aren't being treated differently by politicians because they can give more money.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I believe that the only downside to banning anonymous donations is the potential for people to be treated unfairly by friends or family members for donating to parties that they don't like. Aside from that, I don't see a downside as this will make it harder for structuring of lots of smaller donations to take place.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UTC-M

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-16 20:07:26

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. I would favour a lower threshold for disclosure of donations, say \$200- as a non-trivial minimum requiring disclosure. All donations at and above this level should not be anonymous.
2. Yes, increased frequency of reporting would improve transparency which I favour.
3. There should be a cap on the size of donations. This should be well below \$30,000-, say \$5,000-. All donations above \$200- should be disclosed to the Electoral Commission within 10 days.
4. Yes, in-kind donations should be fully disclosed if their value is above \$200-

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. All donations above \$200- should not be anonymous and should be reported.
7. Candidate loans should be publicly reported.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Yes, I would favour a complete ban on anonymous donations. Full transparency is needed. Only named individuals should be allowed to donate.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 21:12:47

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

#1 -The threshold should be even lower. If someone wants to donate more than they spend on milk each year, then they should be willing to disclose it publicly.

#2 -Good, and not just in election years. We need to see who is influencing our politics.

#3 -This seems to counteract the goals of improving transparency and openness, and as such is a bad idea. We should be lowering that limit, not removing it.

#4 -Good.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes to all these three. All donations should be publicly available information. We need to see who is influencing our politics. These changes, particularly #6 would increase compliance and make it more difficult for parties/politicians to hide or obfuscate their funding.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations should be banned unless under \$150.

Any alternative to banning or severely capping anonymous donations has the potential to be exploited.

It should be a right for an individual to donate anonymously if they wish, however it needs to be strictly limited.

Any corporation or entity other than an individual should not be allowed to make any anonymous donations of any sum.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Corporate donations should be banned entirely, or at the very least tightly restricted to a reasonable sum- an amount based on the average Kiwi's finances. Corporations, particularly those owned by overseas investors, have no place influencing our politics, but if it has to happen, they should have no more influence than a typical kiwi would be able to afford.

Government contractors, trusts, and overseas donations should be likewise limited.

I'd suggest, as a reasonable amount for the above, a sum of \$10,000- which is roughly 10% of the median annual salary in NZ.

A cap encompassing all individual donors should be set at the same rate, with the only exceptions being for estate donations granted in the wills of the deceased- although perhaps those could be capped per annum.

Amounts above that are unfeasible and/or unbelievable as a donation sum for the majority of the country, and we're supposed to be a free democracy with equal representation. Parliament should not be representative of the desires and influence of the wealthy and of corporations.

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:54:08

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes too many times we have seen donations affect policy from government. Cameras on fishing boats and alcohol policy comes to mind. The best democracies are those most protected from undue influence over politicians and parties. I agree with the proposals above.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Transparency is important and therefore, disclosure.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Again transparency. Why would donors wish to remain anonymous except to intentionally blur the influence they wish to bring to bear? Recent revelations regarding foreign governments wishing to "steer" NZ policy should make anonymous donations all the more unacceptable.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Why not measure the current rate of donations pro rata each party and allow government funding to replace the current donation model in equal measure? In that way voters become the lobbyists for all the best reasons

Response ID ANON-VKQE-1UAV-M

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-21 19:34:02

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1UD3-M

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-06 19:31:23

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I am in support of the proposed changes numbered 1, 2, and 4 (lowering the donation threshold for parties, increasing the frequency of reporting, and requiring detailed reporting of non-cash donations).

The current regulations around thresholds and non-cash donations essentially grant high-value donors a level of anonymity that the spirit of the law arguably did not intend.

I am less certain about proposed change number 3, that is, removing the requirement of parties to promptly reveal the identity of donors who gift more than \$30,000.

I realise this is intended to be read in conjunction with proposal 2 (increased reporting frequency), but my instinct is to say that, in an ideal world, we do not want to give political parties any opportunity to obfuscate the data.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I am in support of proposals 5, 6, and 7 (introducing reporting requirements for non-anonymous donations under \$1,500, require public disclosure of financial statements, and and require disclosure of loans).

I realise that the laws protecting donor anonymity were introduced with good intentions; that is, to protect donors from the retaliation of their employers and/or the general public. That said, so long as we allow anonymous donations, we are providing a loophole which can be used political parties to conceal large donations.

In terms of the public disclosure of parties' financial statements, it seems somewhat scandalous to me that we have not historically required this. We expect this level of disclosure from universities, crown institutions, and state owned enterprises - so why not political parties?

Finally, in terms of loans, I feel it would be naïve to think that a loan to a candidate or party in the run-up to an election is, in fact, just a loan. In reality, I suspect that many of these are donations by any other name, but without a reporting requirement, we will never know for certain.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

As I noted in my comments in the previous section, I am deeply sceptical about the idea of anonymous donations. So long as anonymous donations are permitted in any form, I think it quite likely that political parties will find ways to conceal their largest and most controversial donors.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1UZ9-G

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 13:43:38

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes to all.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes.

5 will prevent drip feeding large amounts under the radar.

6 will keep things clean and reduce opportunities for political sabotage via the media

7 will help ensure that a candidate is not beholden to another party rather than the electorate.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Donations should never be anonymous. It is not a cash society any more so tracking of donations is straight forward.

Anonymous donations could easily be drip fed to get around the reporting requirements.

The public needs to know if any organisation has a hidden agenda.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

People elect governments.

Companies don't get a vote and hence don't elect governments.

Companies don't reflect the views of all the people who make up that company.

If companies can influence elections with large donations, it is not that far removed from the days of Rotten Boroughs where one super-rich elector chose

the representative.

Companies are often partly foreign owned so a donation could be considered foreign influence.

A company donation provides a form of anonymity.

A company does not have the interest of the environment or the people at heart, but seeks to reform legislation that will return a greater profit to its shareholders.

Donations should only be from individuals and open to scrutiny.

Political parties need enough money to run a successful campaign.

Such money should be equitably provided in bulk by the taxpayer with limits on individual contributions over and above that.

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:52:15

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Please select

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

It seems pretty clear to me that all four of these changes would improve transparency. Because the wealth inequality in NZ has grown so much the risk of current settings is that they allow a minority (rich people) to have more influence than the majority of people, who couldn't afford a \$15,000 political donation, and they allow that minority to do so without scrutiny. The idea that, for example, the dairy industry- which is financially huge but equally as big an environmental problem- could donate up to \$15,000, possibly multiple times, without it being disclosed and thereby influence laws around regulation of that massively polluting industry is very concerning and off-putting to me. Likewise in-kind donations- if a company is able to provide such a donation that is very high in value and translates to a large sum of money I feel like as a member of the public I want to know about that, or at least know that the information is all there for people to scrutinise.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes I think these would help compliance. 6 and 7 both seem like straightforward ways to achieve accountability for where money comes from and how it is spent. And I think the more reporting there is on all donations the better.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

In principle I like this idea. Though I do see that there could be situations where revealing ones political preference could be compromising to an extent. But again- most people can't even think about donating to a political party they just wouldn't have the money to spare so I think by allowing anonymity we're protecting one portion of society (a wealthier portion) while not giving the rest of us the transparency we deserve if this is truly a democracy that in theory should represent and advocate for us all. For example- housing in NZ is a known crisis. We need more regulation to make housing accessible, but people who own homes are generally better off than those who don't, so if they have that money to make donations and also can be vocal about not bringing in regulation (like CGT), but we never get the details about those donations to see the patterns there could be forces and patterns at work that we're ignorant to as a society that are driving the crisis and increasing our dismal inequality without us even seeing it. To clarify- if a political party gets \$1 million in anonymous donations of under \$1500 there could be clear commonalities in the donors that the party can see but we can't- homeowners as per the previous example, they could be Pākeha, they could be mostly from a certain area, etc- if the party sees those patterns they could influence their

policies and decisions.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

More transparency is better. Definitely. Make all of the changes.

Proactive Release

Response ID ANON-VKQE-1UZH-S

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 23:22:11

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

3 seems like a step backwards for transparency. Frankly I'm shocked the amount is as high as \$30,000. I think this should be removed, if anything I think the current requirement should be decreased to \$10,000.

All other points seem valid

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I think all of the above are fair and would make the process more transparent

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think anonymous donations do provide a sense of security for vulnerable New Zealanders who may not want many people to have access to their private information for whatever reason.

All though I personally do not think there is an issue regarding security I can empathise with their concerns.

I think allowing anonymous donations under \$100 is fair but anything above cannot be made anonymously.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1U5T-6

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:51:42

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I definitely think all the proposed changes to disclosure rules would significantly improve much needed openness also transparency.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Introducing all these proposed changes about reporting would be much more upfront and honest.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Some donors prefer to be anonymous, so they do not get pestered later by others wanting donations if donor names are made public. However, anonymous donations are suspicious if they are just under the threshold needing to be declared. In this case there should be a ban on such donations that avoid compliance and adversely affect transparency.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Democracy relies on a level playing field, not just the rich helping the party of their choice. These proposed changes are essential for Aotearoa, NZ to remain a democracy.

out of scope

From: s9(2)(a)
Sent: Thursday, 13 January 2022 3:03 pm
To: electoral

To whom this may concern,

I wish to share my responses about the proposed changes to political donations.

If we value a vibrant, transparent democracy, we may want to talk about:

- Capping political party donations to \$1500 per donor
- Requiring political parties to identify donors for donations over \$100
- Calling for all 'in kind' donations to be shared with the public
- Stopping businesses from being able to donate

We want a more fair, just society when the majority is impoverished and struggling to meet daily costs of living and feeling disenfranchised. The risk of not bothering to invest their voting rights to elect a political party only to know that it will not matter if a super wealthy minority influences and shapes the political decision making process persists.

We don't want Aotearoa to be ruled by oligarchy.

Thanks for your attention to this matter,

Warm regards

s9(2)(a)

Response ID ANON-VKQE-1UZ2-9

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 22:44:51

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Not enough. We need to ban all corporate and anonymous donations, and cap the amount of money an individual can donate. I oppose removing the requirement for parties to publicly disclose, within 10 days, the amount donated, and identity of the donor, in cases where the donor has donated over \$30,000 within the previous 12 months.

Corporations are not New Zealanders. They are businesses that have a profit motive and a vested interest in protecting their bottom lines. In a healthy democracy companies should not be able to buy political influence. We should all be able to trust that our leaders are acting in the best interests of the people of Aotearoa, not the best interests of big business.

Corporate political donations must be banned and there is already precedent for this. The Ministry of Justice states that when it comes to restricting or banning certain types of donations, including corporate donations "there is precedent and merit for these types of restrictions as they restrict the influence of vested interest". Globally there is certainly precedent. As of 2012, around 36 countries had a ban on corporate donations.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

barely

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think we need to think about how when donations are anonymous, foreign donations can wean their way in.

Last year MOJ said "Banning anonymous donations (similar to the existing ban on overseas donations) could be a significant and principled shift towards transparency."

I agree. All donations over \$100 should be public.

I oppose the proposal to "remove the requirement for parties to publicly disclose, within 10 days, the amount donated, and identity of the donor, in cases

where the donor has donated over \$30,000 within the previous 12 months.” As noted in this submission Greenpeace recommends a ban on anonymous donations above \$100 and a cap on the amount any individual donor can give at around \$10,000. However, if these changes are not made, then at the very least, prompt disclosure of large donations must remain a requirement.

Furthermore, the Government has in theory banned foreign donations in 2019, but in practice has failed to do so. The Government’s own advice points out, by allowing anonymous donations there is no way to be sure that this ban is being adhered to. Prior to the ban on foreign donations, Ministry of Justice officials stated, in their briefing paper on the issue, that: “Lowering the threshold or banning overseas donations without also amending the threshold for anonymous donations may undermine the intent of the change. This issue is also raised by IDEA, who state that “it is unclear how a ban on foreign funding can be enforced if anonymous donations are allowed.”

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Corporate donations are the key thing that should be banned. They have no place here.

Proactive Release

Response ID ANON-VKQE-1UZS-A

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 21:48:23

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1, 2, and 4 - yes, they'll make the influence of donations on political parties more visible, which it should be for a robust democracy.

3 - no. Why remove disclosure requirements? That's the opposite of transparency.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I support the proposed changes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I support banning anonymous donations. Anonymous donations undermine the transparency and hence the robustness of our democracy.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

The proposal is a good start, but I also suggest that you:

- Cap political party donations to \$1500 per donor
- Require political parties to identify donors for donations over \$100
- Require all 'in kind' donations to be shared with the public
- Stop businesses from being able to donate

We need a transparent, robust democracy that represents all of us, regardless of how much money we have. The current system allows the rich to disproportionately influence politicians - a situation which has led to a climate crisis, a housing crisis, and increasing income inequality. This needs to change.

Proactive Release

Response ID ANON-VKQE-1UW5-9

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-23 16:33:27

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Donations should be made publicly available immediately upon receipt in a publicly accessible register for all parties maintained by the government. This removes the anonymity issue, obviates the frequency and time limit issues. Donations in kind can be treated this way also.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Candidate loans would be part of the donations register mentioned above.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Ban them. Support for candidates should be public at all times in the interest of limiting money's power to sway elections. Voters should know who is backing candidates financially.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

The sooner the better.

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 21:33:58

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

A reasonable start but there should be a cap on total spending so as not to give parties with whale donors an unfair advantage over smaller ones.

Smaller parties need to be included in debates as there some really great ideas out there that need to be in front of voters. Small parties a where the fresh ideas come from, arbitrary rules to exclude these parties from debates is almost undemocratic.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UVR-5

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-17 11:27:36

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

This is an improvement but I don't think it goes far enough:

I believe the disclosure threshold should be \$100.

'In kind' donations should be disclosed to the public.

I do not understand the rationale behind no 3. It seems on the face of it a backward step.

All of this because of the harmful potential for the donors to influence decision makers.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes I support these changes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I would support a ban on anonymous donations. Again in the interest of transparency.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I believe that businesses should not be able to donate. Again because of the potential impact on decision making.

Response ID ANON-VKQE-1U67-A

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 12:44:32

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, I support all these changes except for (3). The requirement to disclose donations that exceed \$30,000 within 10 days should be retained.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I support these (5,6,7)

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Only citizens and permanent residents (potential eligible voters) should be entitled to make anonymous donations, and only subject to the \$1,500 threshold. This would exclude corporations, trusts, and other legal persons that are not a natural person from eligibility to make anonymous donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Kiwis deserves a fair go and keeping big/money out of the system ensure it is fair to everyone not just the rich.

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 20:04:24

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes

But am not comfortable with proposed rule number 3 as I believe that all donations should be identified and not anonymous

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes - a good start towards transparency

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I agree fully with banning anonymous donations and in kind donations as it will help reveal any potential corrupting influences

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1U5E-Q

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:47:35

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

All donations worth 1500 or more , in kind and cash should be disclosed

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

All donations over \$99 should show who donated. The donation paid regularly over a year should be disclosed as one amount

I support other proposed changes

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

All donations over \$99 should be disclosed

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Stop businesses from being able to donate, all donations should be from people as individuals and limited to \$30,000.

Response ID ANON-VKQE-1UUF-R

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 17:02:29

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Any move to limit the influence of the wealthy on our democratic system is welcome. The proposed rules will go a long way to limiting that unfair influence and with greater transparency the culprits may find that the embarrassment of having their names published is not what they want. There needs to be cross party agreement on this but that is wishful thinking.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Such reporting needs to be detailed as to the actual person giving the money. Trusts and like entities should not be allowed unless all the trustees are named in person.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

If there are anonymous donations allowed even \$1500, with money exchange so easily organised on it would be feasible to make 1000 separate transactions of \$1500 .

This also needs to be addressed.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

The background to political donations and their influence is well covered by Thomas Piketty in his work 'Capital and Ideology' . Although a massive amount of research is covered by him his conclusions are irrefutable, money talks and has so for possibly centuries. It needs to stop.

Response ID ANON-VKQE-1UUD-P

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 10:43:30

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I support the proposed changes to rules and thresholds.

I would also like there to be a cap on funds available for electioneering. The money wasted on face recognition and (plastic) placards everywhere is money that could be better spent for the common good., ie social services etc.

In this climate crisis, and during Covid times we should not tolerate rich people funding the political party they want to keep them wealthy.

Is there a way that a limited amount of public money could be allocated for information rather than PR spin?

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I can imagine that there are ways to rort the system and people will employ lawyers to find them.

How can you get an insiders view on this???

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I consider transparency more important than the right to privacy. No doubt there will be donations by Mickey Mouse etc but these can be investigated.

People need to have trust in the political system to follow the Laws that are passed, and transparency is one of the pillars for this.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I urge you to consider making electioneering money limited and preferably Govt funded.

People can donate money to Parties for research, or anything else that isnt actually for elctioneering.

Proactive Release

Response ID ANON-VKQE-1U59-B

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:25:37

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. I SUPPORT lowering public disclosure threshold to \$1500 for parties.
2. I SUPPORT increasing frequency of donation reporting.
3. I OPPOSE removing the requirement to disclose to the Electoral Commission, within ten days, the identity of the donor and amount for donations that exceed \$30,000.
4. I SUPPORT introducing requirements for parties and candidates to disclose more details about in-kind donations.

All of my above positions are in the interest of transparency and openness and I consider that so obvious as not to need further explanation.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. I DO NOT CARE either way about introducing reporting requirements for non-anonymous donations under \$1,500. BECAUSE that amount is low enough to be inconsequential.
6. I SUPPORT introducing a requirement to publicly disclose financial statements. BECAUSE that is in the interests of transparency and openness.
7. I SUPPORT introducing a requirement to publicly report on candidate loans. BECAUSE that is in the interests of transparency and openness,

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

1. If not BANNED, anonymous donations must be limited to a SMALL AMOUNT eg. \$1,500 as above:
2. The limitation to small amounts is only viable if MULTIPLE donations by the SAME DONOR are prevented:
3. Which requires the recipient of donations to IDENTIFY ALL DONORS even if that identity need not be publicly disclosed:
4. Existing mechanisms for AML/CFT make identification easy to implement:
5. Given all of the above, the restriction of political donors to be natural persons on the NZ ELECTORAL ROLL (for party donations) and on the ELECTORATE ROLL (for candidate donations) is both feasible and desirable.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

1. I believe that political donations should be restricted to natural persons on the electoral roll in the the same way, and for the same reasons, that voting is so restricted.
2. It should be an offence for any person to accept money from any other person or organization in order to make a political donation in their own name.
3. New Zealand is not yet subject to extreme political corruption in the style of many other jurisdictions.
4. The example of extreme political corruption in the USA (in particular) is likely to followed rather soon unless urgent and effective action is taken to prevent that.

Proactive Release

Response ID ANON-VKQE-1UZ8-F

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 13:19:27

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I support the proposals, with the proviso that all donations, whether monetary or in kind, must be publicly disclosed within 10 days of the date of donation, and cannot be anonymous.

I add that political affiliations of donors must also be disclosed, whether they are residing domestically or overseas.

No corporate donations of any size or kind to be allowed.

These proposals and my suggested amendments should be designed to eliminate the current excessive power of wealth on political outcomes, which is corrosive and counter to any meaningful exercise of democracy by all members of our society.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

The most basic requirement for a functioning democracy is publicly available, easily accessed and uncensored information.

The proposals will enhance the ability for us to understand candidates' and political parties' agendas, so I support them.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I believe hidden agendas and foreign influence on democratic outcomes are the most important issues to consider with regard to all donations of all kinds.

No anonymity can be countenanced.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

If an individual donation has actually come via that individual from a third party individual or organisation (or other entity), that must be disclosed subject to severe penalties.

Proactive Release

Response ID ANON-VKQE-1UA3-H

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-21 19:19:02

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Possibly. Im sure however that the parties and donors would find ways around this. for example with change 1. they could just spread a large donation over several people. e.g just get 100 people to donate \$1499 and you have essentially still an anonymous \$150,000 donation. Reducing this threshold to say \$100 would make this process a lot harder. What is the harm in knowing the identity of all donors??

How about capping the maximum amount that any one person or corporation can donate.

I think change number 3. goes against increasing transparency unless I am reading it wrong.

Possibly a better way forward would be to just ban all corporate donations.

All parties have the same amount of taxpayer money for campaigning and that is it - gives an even playing field and removes any corporate influence on decisions for the parties that get in. so they get in on merit of what they offer not how much they are able to influence the public by having a bigger campaign pot of money.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I think every financial aspect of a campaign should be publicly available. then it ensures accountability.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Yes anonymous donations should 100% be banned.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Hopefully feedback will actually be listened to and acted on unlike other recent government related feedback submissions

Proactive Release

Response ID ANON-VKQE-1UBS-J

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-15 07:59:07

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, it is a step in the right direction. Politics should not be governed by the biggest check book. I actually think all donations should be disclosed. (item1). All donations should be disclose including in kind (item 4)

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

There should be no anonymous donation all donations should be reports (Item 5). All financial statements should be made public (item 6) All loans should be reported (item 7) Political parties and politicians are public figures we should know where there money comes from and where it is going, this will increase trust by the general public and keep things honest

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Ban all anonymous donations, these do not belong in our political system, it is an avenue for corruption.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

These changes are good but do not go far enough.

Response ID ANON-VKQE-1UWY-D

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 20:57:09

Have your say

Tell us about yourself

What is your full name?

Name:
Dr Mark Craig

What is your email address?

Email address:
markcraig@doctors.org.uk

Are you providing feedback as an individual or on behalf of an organisation?

Organisation

What is the name of your organisation?

Organisation:
Evidence based eating nz

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Mostly yes. Crucial for open democracy. And corporate influence for their favour.
Item 3 we disagree with as it seems to reduce transparency.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes as above to trace the sources of financial influence. Crucial changes to uphold democracy.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Yes. Again crucial to protect democracy.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

These are crucial to stop us becoming like the USA where money determines political decisions.

Response ID ANON-VKQE-1UWF-T

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-23 21:52:27

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes I do think that this will improve openness - anyone donating to political party is potentially influencing the party and this influence needs to be publicly disclosed. NZ elections should be democratic, and not biased to the wishes of those with large amounts of cash to spend on donations. I fully support lowering the disclosure threshold but think the \$1500 threshold is too high - why have any threshold at all? I think all donations should be disclosed.

Likewise I think that anonymous donations should be prohibited. If anyone is trying to influence a political party then they should be willing to identify themselves. Allowing anonymous donations allows a loophole through which lobbying individuals can make multiple anonymous donations in secret. Donating via the Electoral Commission should be publicly disclosed to allow third party observers to identify political lobbying via donations.

I support the increase in frequency of reporting, and feel that 3 months is reasonable given the proposed relaxation of the 10 day reporting time for donations over \$30k.

I support the reporting of in-kind donations and candidate loans.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I support the reporting of all donations to prevent large donations being split up into multiple small donations, and the public reporting of all loans and donations.

Parliament is supposed to server the people so there must be transparency of political influence so the the people on NZ can be confident that political parties and candidates are behaving democratically.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I support a ban on anonymous donations.

I see no creditable reason to allow anonymous political donations. Allowing such donations opens are loophole whereby large donations can be split into multiple smaller anonymous donations. When a political party enters parliament the public needs to have confidence that the party will be acting for all of NZ and not just a wealthy subset.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1UT3-4

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-15 10:27:49

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I think the proposed changes to disclosures and thresholds begin to improve transparency and openness but do not go far enough.

1. I agree with the principal of lowering of the public disclosure threshold for donations to parties. However, this should be significantly lower (\$0-\$50) as this is more realistic of what the average citizen is likely to donate. This will better inform the public about political donations (and by extension lobbying by special interests).
2. I agree with the proposal to increase the frequency of reporting. This is better for data collection and informed decision making.
3. I disagree with the proposal to remove the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000. This requirement should be kept and the threshold lowered to \$10,000 for improved transparency and openness.
4. I agree with the proposal to introduce requirements for parties and candidates to disclose more details about in-kind donations.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I agree with the proposals to:

5. Introducing reporting requirements for non-anonymous donations under \$1,500,
and
6. Introducing a requirement to publicly disclose financial statements,
and
7. Introducing a requirement to publicly report on candidate loans.

These measures will strengthen openness and transparency in our democracy.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Two thirds of the parties in Parliament since 2017 are facing charges from the Serious Fraud Office over their political donations. They're variously accused of not declaring donations, filing returns too late, deception around obtaining donations or illegally concealing the donors' identities - <https://www.rnz.co.nz/programmes/the-detail/story/2018799972/the-secrecy-and-fuzziness-around-political-donations>.

Introducing a ban on anonymous donations should reduce the incidence of issues around political donations by ensuring transparency and openness around the political donation process - who is involved, how much they are donating, and to whom.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

As it currently stands, political parties are the ones who write the rules for themselves. Greater democratic participation by citizens to determine the rules around political donations to political parties is an important part of a healthy democracy. This consultation is an important step in this process and further involvement by citizens around proposed changes to political donation rules in electoral law such as further consultation, public referendum (possibly during an election year such as with cannabis reform), and after implementation - a review.

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:16:05

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Lowering public disclosure threshold for donations to \$1,500 for parties

-> I want political party donations capped at \$1500 per donor. Political parties to have to identify donors for donations over \$100.

I do not want businesses to be able to donate.

2. Increasing frequency of donation reporting

-> Good

3. Removing the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000

-> No, this hides large donations and is undemocratic !!!!

I think all political party donations should be capped at \$1500 per donor.

I want political parties to identify donors for donations over \$100 and businesses to be unable to donate.

4. Introducing requirements for parties and candidates to disclose more details about in-kind donations.

-> Yes, I want all 'in kind' donations to be shared with the public

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. Introducing reporting requirements for non-anonymous donations under \$1,500

Good.

I want capping of all political party donations to \$1500 per donor and Requiring political parties to identify donors for donations over \$100.

Calling for all 'in kind' donations to be shared with the public

Stopping businesses from being able to donate

6. Introducing a requirement to publicly disclose financial statements

Yes, good.

7. Introducing a requirement to publicly report on candidate loans.

Yes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Yes, it is vital that ALL donations over \$100 are identified.

It is also important to me that businesses are not able to donate.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1UU7-9

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 15:09:31

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

N/A

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes but they do not go far enough.

You should lower the public disclosure threshold for donations to \$500 for parties

You should NOT Remove the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

You should introduce reporting requirements for non-anonymous donations over \$500

6 agree

7 agree

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Currently many anonymous donations are channeled through Trusts, this should be banned and all anonymous donations over \$100 should be banned

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UTQ-2

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-15 10:51:20

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. I believe that all political donations should be public, there should be no anonymous donations
2. Agree with increased frequency of reporting
3. If all donations are public (no anonymous donations) including donations in kind, then there may be no need for additional administratively burdensome reporting
4. It is important that opportunity to obfuscate donations is removed, such as "auctions". The principle of full transparency must be prioritised. Transparency of donations is essential to democracy.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. A simple requirement for public reporting of ALL donations and abolishing anonymous donation is needed. This would be a very simple rule.
6. Public disclosure of financial statements would ensure all sources of income (and therefore influence) were transparent, and that rules for full reporting of all donations (no anonymous donations) were being followed.
7. Agree

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations should be banned. The principle of transparency in political process must outweigh any wish for individual anonymity. The ability for wealthy individuals or businesses to wield influence anonymously must be curtailed. The democratic principle of every person having equal representation must be protected from distortion by anonymous donations. Voting should be anonymous but buying other peoples votes should not, nor should buying any form of political influence over others. Individuals who wish to be active politically in this way should be prepared to be identified and stand by their convictions and actions.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

1. Donation caps should be introduced similar to Canada so that very wealthy people don't have the opportunity to distort the democratic process
2. Reform of funding for political parties is needed including prevention of use of parliamentary services funding for electoral purposes
3. Funding of broadcasting for election advertising needs to be reformed to reduce the disproportionate advantage to parties already in parliament
4. Electoral commission recommendations for changes to MMP threshold and abolition of coattailing should be implemented to improve representativeness and democratic principles that each vote has equal value.

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 16:43:58

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, I think disclosing substantial donations publicly is important. I think that the tit for tat with large donations is the thin edge of the wedge of corruption

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes. Political donations need to have a reasonable limit, and be transparent

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Just the upper limit, and also that one party can't make many donations to the same political party.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Seeing what happens in the US, I'd say the less vested interest money in politics the better

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 17:19:09

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes I think all changes would improve transparency and openness. They ensure more complete and timely disclosures.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes. More formal and precise reporting requirements will give greater confidence that the Commission will be able to ensure compliance.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I believe it is wise to ban anonymous donations, which otherwise go against the purpose of transparency and openness.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Yes, in relation to the proposal to remove the requirement for parties to publicly disclose, within 10 days, the amount donated, and identity of the donor, in cases where the donor has donated over \$30,000 within the previous 12 months.

While replacing this with 3- or 6- monthly reporting makes good sense during non election years, I believe more frequent reporting is desirable in the lead up to an election.

I would recommend that as soon as an election is called there should be reporting within 10 days of any yet to be disclosed donations, and within 10 days of any subsequent donations up to the date of the election.

Response ID ANON-VKQE-1UAZ-R

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-21 23:48:11

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Example of abuse. The Australian Liberal Party is part funded by the coal industry. In return the ALP subsidises coal. This is corrupt, like laundering Govt. funds to fund the ALP.

Consequently, I support the proposed changes. My personal view is that there should be strong penalties for abuse including MP or candidate dismissal, party disqualification, fines of 10 x the value of the financial abuse and ultimately jail sentences.

Sincerely,

s9(2)(a)

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Ditto

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

All donations should be open and auditable

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

All donation should come from citizens, and Not:

Corporations,

those with vested interest

Foreign parties, interest and government.

Response ID ANON-VKQE-1UD6-Q

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-07 11:33:29

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes (1, 2, and 4).

No for 3 but I understand that this change is to remove unnecessary compliance after the change outlined in 2.

I agree with the rationale outlined in the briefing to Minsiter Faafoi (ELP-15-02). I also agree with the idea of removing anonymous donations completely. The counter argument presented in the briefing (the need to protect donor privacy in respect of political affiliations consistent with the secrecy of the ballot) is weak. Attributing likeness between voting for a political party and donating to a political party is counter intuitive. Voting ensures every New Zealander (of the applicable age) has the right to have a say on how their country is governed. Political donations simply allow privileged individuals to sway politicians even more so. A fair system would remove political donations completely and provide political parties with a set amount of Govt funding for electioneering.

The second part of the counter argument, the potential dampening effect a ban could have on donor participation for those who value anonymity above this form of political participation makes little sense as this is a problem for political parties not the NZ public and the point of the electoral law is not to make things easy for Political Parties but to make things clear and transparent and fair for the NZ public.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes.

I see no reason why political parties (and their candidates) should not have to report on every donation they receive with information about who donated and how much was donated.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I see no reason for anonymous donations to exist. Political parties are not charities. They are organisations that, if successful, hold a great deal of power. Because of this the level of transparency associated with the process of them obtaining that power needs to be as high as possible and anonymous donations decrease transparency.

In general I do not agree with the level of privacy we attribute to our political system. Politicians and voters alike should be held accountable for their choices. However, while I can agree with political votes being a private affair I see no reason for political donations to be private.

I also question the concern that by removing anonymous donations will reduce funding for political parties. Firstly they are not entitled those donations, they are a privilege not a right. And secondly, the intent behind an anonymous donation is always in question. Removing anonymity helps to reduce this issue.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1U6T-7

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 18:37:47

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

In my opinion, points 1, 2 and 4 will result in improved transparency and openness. I think that proposed change 3 would result in a decrease of openness and transparency.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Enacting upon point 5 would likely introduce administrative work and may create issues with compliance initially, but the outcome would be increased openness and transparency. \$1500 is a large amount to donate to a political party for no return.

I support enacting points 6 and 7. These will add minor administrative tasks to be done to matters that the general public would likely be interested in.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Up to \$1500 is a lot of money to donate to a political party without any return.

There is potential for Thurs to be abused or data falsified, so increased reconciliation of transaction standards or association with a registered person on the electoral role should be required.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Donations should be associated with a person who is registered on the electoral or a NZBN or other code to be able to be traced.

Response ID ANON-VKQE-1UV5-8

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-19 15:15:49

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

n/a

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I believe that lowering the public disclosure threshold (1) and increasing the frequency of donation reporting would improve transparency - both would make it clear when candidates are accepting donations from special interest and religious groups that held potential values clashes with a voter's.

I also believe having to disclose more details about in-kind donations would lead to more transparency, and would prevent special interest and religious groups from finding ways around the current disclosure rules.

I can't see how removing the requirement to disclose donations of \$30,000 to the Electoral Commission would increase transparency - it sounds like it would have the opposite effect.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I think all of the proposed reporting changes could support compliance, however, I'm not sure it's fair to political candidates to require them to publicly disclose financial statements and loans in all situations. I'd like to see more discussion about which situations it would and wouldn't be appropriate in.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think the size of each individual donation is important, as is the total sum of all anonymous donations a candidate receives.

I believe that there are other factors that would also be important, but I'm not sure what they are, and would like to see some discussion on the topic.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Proactive Release

Response ID ANON-VKQE-1U5U-7

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:33:12

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Lowering public disclosure threshold for donations to \$1,500 for parties. Yes I support this. I also think that companies should not be donors.
2. Increasing frequency of donation reporting. Not sure - I note that frequent reporting requirements encourage people to find ways to minimise the effort and depth of integrity.
3. Removing the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000. Not sure - I don't understand the significance of this move.
4. Introducing requirements for parties and candidates to disclose more details about in-kind donations - Yes! Absolutely. Otherwise donations becomes a game of how to hide it.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. Introducing reporting requirements for non-anonymous donations under \$1,500. Yes, every piece of accountability matters. Democracy, as we can see around the world, is very fragile. I note that the United States is no longer rated as a democracy, in large part because of the power of money to influence results.
6. Introducing a requirement to publicly disclose financial statements - Yes! Definitely!
7. Introducing a requirement to publicly report on candidate loans. - Yes. This is another loophole that can be exploited.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations may be promised by a donor, with a smoke screen that it is anonymous in the accounts.
Why would somebody donate anonymously? What are they seeking to shield themselves from?

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I would like to see:

- Capping political party donations to \$1500 per donor
- Requiring political parties to identify donors for donations over \$100
- Calling for all 'in kind' donations to be shared with the public
- Stopping businesses from being able to donate

Proactive Release

Response ID ANON-VKQE-1UVU-8

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-17 15:38:28

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

It should be clear where political parties are receiving their funds from. I feel the donor and amount for donations should be disclosed in all instances over \$1500.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I think that it should be made really clear where donations are coming from and public disclosure will help this

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I do not feel any donation to a political party should be anonymous.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UBD-3

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 08:03:51

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

-

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I strongly support provisions 1,2 & 4 for improving transparency & openness, but find #3 contradictory. Potentially this seems to encourage large donations (> \$30K) which would NOT be reported ie could be "secret" or at least "obscured".

The power of transparency & honesty in monitoring political donations is essential in developing a fairer system, by limiting the influence of larger donors.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I support all these proposed changes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I strongly support the concept of a BAN on ALL anonymous donations, and those that can't be easily attributed (ie donations made through third parties of "other" entities).

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

-

Response ID ANON-VKQE-1UD8-S

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-07 08:44:42

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Lowering public disclosure threshold for donations to \$1,500 for parties:

-This has relatively obvious effects of increasing transparency and I would argue that the threshold is set too high in the proposal. I believe the threshold for disclosure should be set at a number that will avoid capturing small personal donations but capture those by organisations or wealthy individuals. For the vast majority of people in Aotearoa NZ a \$1500 donation to a political party is well out of reach given an median household gross income of just over \$100k. The number would be more appropriate around the \$500 mark.

2. Increasing frequency of donation reporting:

3. Removing the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000:

-These two proposals go hand in hand and to do the third without the second would be counter to the stated goals of transparency and openness.

4. Introducing requirements for parties and candidates to disclose more details about in-kind donations:

This is very important to increase transparency. At the moment there is widespread public perception that political parties avoid the rules around donations and disburse indirect donation schemes.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

All three of proposals 5-7 are very important for transparency and compliance of political parties. It is a very fundamental part of any representative democracy to have oversight and disclosure of potential sources of influence over elected representatives.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Political donations should not be anonymous as it is very important to be able to see the sources of influence on elected representatives.

There is the potential for a need for limited exceptions to this to allow all people in New Zealand to participate equally in the political process. I.e. for those whose professional roles preclude them from openly endorsing a political party such as civil servants.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

The changes are a good step towards a more transparent and open democracy. However care needs to be taken to not exclude new political parties from participating in the political process via introduction of bureaucracy.

Proactive Release

Response ID ANON-VKQE-1UD2-K

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-10 15:33:27

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1 Agree extremely strongly with 1

2 Any donation over \$20,000 to be reported within 10 working days.

3 Reduce the the level from \$30,000.00 to \$20,000.

4 Any in kind donations should have the same disclosure requirements as cash.

5 No donations from Trusts or Companies or any other contrived structure or entity can be accepted. Extremely punitive anti avoidance provisions. Only donations permitted are those from natural persons or NZ Registered Companies.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. Happy for these to remain anonymous provided if no other donations are made in any financial year from the same person or related entity.

6 Excellent idea. Transparency.

7 This has been used as a way of avoiding disclosure and this should apply not only to candidates but to parties.

In return there must be a doubling or even tripling of tax payer funding of political parties.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Transparency and it helps destroy the conspiracy theorist rumours.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

The main opposition will be arguments these rules and the further amendments suggested by myself will reduce funding.

I think taxpayers doubling or tripling taxpayer funding for political parties is far better for a transparent democracy than allowing anonymous donations or allowing avoidance schemes to continue.

Proactive Release

Greenpeace Aotearoa submission on changes to political donation rules in the Electoral Act

INTRODUCTION

KEY RECOMMENDATIONS

[Ban all corporate donations](#)

[Ban anonymous donations over \\$100](#)

[Cap the amount an individual donor can donate](#)

INTRODUCTION

“In all regions of the world there is a deeply worrying trend of money in politics drowning out the voices of ordinary citizens.”¹

- The International Institute for Democracy and Electoral Assistance (**IDEA**)

Greenpeace Aotearoa welcomes the opportunity to submit on the proposed changes to the political donation settings. We are deeply concerned about the influence wealthy companies and rich individuals can exert on our political system via the current political donation rules.

Every New Zealander deserves to have a say in how our country is governed, regardless of how much money they have. Big business and rich individuals should not be allowed greater access to political power and influence simply because they have more money than others. We should all be able to trust that in Aotearoa our leaders will act in the best interests of the people and the environment on which we depend, not in the best interests of companies or rich individuals that have donated to them. And voters have a right to know who is funding political parties when they go to the polling booths.

But as it stands, the rules on political donations do not ensure that these democratic principles are built into our political system in Aotearoa. Currently wealthy companies and rich individuals can exert influence over political parties and important decisions they make about Aotearoa through making large, at times undisclosed, political donations. These corporate and anonymous political donations are fundamentally corrosive to our democracy.

IDEA is an intergovernmental organisation that works to strengthen democratic institutions and processes worldwide. They state: “For a democracy to be healthy, it must revolve, first and foremost, around the citizen. And for a democracy to be sustainable, it requires transparent, accountable and inclusive political parties that can channel the demands of the people and truly represent them.”²

¹ <https://www.idea.int/sites/default/files/publications/funding-of-political-parties-and-election-campaigns.pdf>

² International Institute for Democracy and Electoral Assistance, 2014. “Funding of Political Parties and Election Campaigns A Handbook on Political Finance” pp. VI. Accessed 10/1/22 at idea.int

It has never been more important than right now to strengthen our democratic system and reduce the influence of money from big business and rich individuals on our political leaders. Most of our native fish, birds and other wildlife are on the brink of extinction. The pollution of our rivers, lakes and drinking water is at an all-time high.³ There is less than a decade left for political leaders to make the policy decisions that will slash emissions and allow us to escape the worst impacts of the climate crisis. Without urgent political action we risk losing the very things on which we depend for our survival, like clean water, sufficient food, and safety from extreme events like wildfires, storms and floods.⁴

Decisions our leaders make about the climate and biodiversity crises must not be influenced by political donations from the very polluting and extractive companies driving these crises.

Greenpeace is calling for a ban on corporate donations, a ban on anonymous donations above \$100, and a cap on the amount any one individual can donate to a political party or candidate.

KEY RECOMMENDATIONS

Greenpeace Aotearoa supports

1. A ban on all corporate donations to political parties and candidates.
2. A ban on anonymous donations above \$100.
3. A cap on the amount an individual donor can donate
4. Greenpeace Aotearoa also supports the following changes that have been proposed:
 - a. Introducing requirements for parties and candidates to disclose more details about in-kind donations
 - b. Introducing a requirement on political parties to publicly disclose financial statements
 - c. Introducing a requirement to publicly report on candidate loans.

Greenpeace Aotearoa opposes

5. Removing the requirement for parties to publicly disclose, within 10 days, the amount donated, and identity of the donor, in cases where the donor has donated over \$30,000 within the previous 12 months.

³ MFE and Stats NZ, 2019. "New Zealand's Environmental Reporting Series: Environment Aotearoa 2019." Wellington: Ministry for the Environment.

⁴ Intergovernmental Panel on Climate Change, 2018. Mitigation Pathways Compatible with 1.5°C in the Context of Sustainable Development. In: Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C.

Ban all corporate donations

"There's no need for anyone other than New Zealanders to donate to our political parties or seek to influence our elections."⁵

- Justice Minister Andrew Little, 2019.

Greenpeace agrees with this principle stated by the labour-led Government in 2019 when it moved to ban foreign donations. However, the current rules are at direct odds with this principle because corporate political donations are still allowed.

Corporations are not New Zealanders. They are businesses that have a profit motive and a vested interest in protecting their bottom lines. In a healthy democracy companies should not be able to buy political influence. We should all be able to trust that our leaders are acting in the best interests of the people of Aotearoa, not the best interests of big business.

IDEA states that "donations seen as an investment by corporate interests have been reported from virtually all regions."⁶ Researchers have found that larger polluters tend to be larger political contributors, suggesting that such corporations may be seeking to manage the political risk caused by their operations⁷

When companies give political donations it greatly undermines trust and confidence in our political system and creates an uneven playing field in our democracy. Voters can no longer be sure that elected parties will then act in the best interests of the people of Aotearoa or whether they will instead act in the best interest of their wealthy backers.

Corporate political donations must be banned and there is already precedent for this. The Ministry of Justice states that when it comes to restricting or banning certain types of donations, including corporate donations "there is precedent and merit for these types of restrictions as they restrict the influence of vested interest".⁸ Globally there is certainly precedent. As of 2012, around 36 countries had a ban on corporate donations.⁹

In the absence of a ban, large corporate political donations are occurring here in Aotearoa. In the lead up to the 2017 election, Talley's, one of Aotearoa's largest fishing companies, was the second biggest donor to election campaigns¹⁰.

"An RNZ investigation revealed that the managing director and company made donations totaling tens of thousands of dollars to the New Zealand First Foundation, which was found to have been bankrolling the New Zealand First Party... The foundation received \$26,950 from seafood giant Talley's and from managing director Sir Peter Talley between 2017 and 2019. It received the money from Talley's in four amounts - all of which were below the threshold for public disclosure. As well as donating to the

⁵ <https://www.beehive.govt.nz/release/government-ban-foreign-donations>

⁶ International Institute for Democracy and Electoral Assistance, 2014. "Funding of Political Parties and Election Campaigns A Handbook on Political Finance" pp. V. Accessed 10/1/22 at idea.int

⁷ Cho, C. H., Pattern, D. M., & Roberts, R. W. 2006. "Corporate political strategy: An examination of the relation between political expenditures, environmental performance, and environmental disclosure." *Journal of Business Ethics*, 67(2), 139–154.

⁸ Ministry of Justice, 2021. "Package of potential changes to political donation settings prior to the 2023 General Election" Proactive release V5 of briefing paper. Accessed at <https://consultations.justice.govt.nz/>

⁹ International Institute for Democracy and Electoral Assistance, 2012. "Political Finance Regulations Around the World An Overview of the International IDEA Database" Accessed 10/1/22 at idea.int

¹⁰ <https://www.nbr.co.nz/analysis/chance-change-talley-s>

foundation, Talley's made a \$10,000 candidate donation to NZ First Cabinet Minister Shane Jones in 2017 and another \$2000 donation to fellow NZ First MP Fletcher Tabuteau. Talley's donated a total of \$40,000 to eight other candidates during the 2017 election campaign - seven from the National Party and one from Labour - giving each of them \$5000."¹¹

While we are not suggesting there is a direct connection between Talley's political finance activities in 2017-2019 and the fisheries management decisions that were made by the Government, we are deeply concerned about the impact corporate donations like these may have on our democratic process.

Furthermore, by continuing to allow corporate donations the Government has created a significant loophole in the ban on foreign donations announced in 2019. As experts have pointed out, a donation from a company registered in New Zealand is not currently considered a foreign donation, even if that company is wholly owned by people outside New Zealand.¹²

Greenpeace strongly recommends the Government ban all corporate donations to political parties and candidates. While we appreciate this will take work and require additional anti-avoidance rules, we believe the issue must be prioritised. Given the urgency of a robust political response to the climate and biodiversity crises, the influence of vested interests in our political system must be heavily restricted immediately. Greenpeace urges the Government to ban corporate donations before the 2023 election.

Ban anonymous donations over \$100

"Banning anonymous donations (similar to the existing ban on overseas donations) could be a significant and principled shift towards transparency".

- Ministry of Justice, 2021¹³

Greenpeace agrees with this statement made by the Ministry of Justice in their briefing on the package of potential changes to political donation settings. Greenpeace urges the Government to lower the public disclosure threshold for identifying donors to \$100 for both political parties and candidates.

The Government's own stated intention with this package of proposed rule changes is to "improve the overall transparency and openness of political funding."¹⁴ Allowing large anonymous donations to continue is at direct odds with transparency and openness.

Voters have a right to know who is funding political parties when they go to the polling booths. If a political party or a candidate has received donations from a company or a rich individual, voters need to know, so that they can assess the potential motivations of those they are voting for. Large anonymous donations are fundamentally harmful to our democracy. They erode public trust and confidence in the system.

¹¹ <https://www.nz.co.nz/news/in-depth/410299/concerns-over-secret-fisheries-donations-to-nz-first-foundation>

¹² <https://www.theguardian.com/world/2019/dec/03/new-zealand-bans-foreign-political-donations-amid-interference-concerns>

¹³ Ministry of Justice, 2021. "Package of potential changes to political donation settings prior to the 2023 General Election" Proactive release V5 of briefing paper. Accessed at <https://consultations.justice.govt.nz/>

¹⁴ Ministry of Justice, 2021. "Possible changes to political donation rules in the Electoral Act. Factsheet" Accessed 10/1/22 at consultations.justice.govt.nz

According to IDEA - “It is common for money in politics to operate behind closed doors and involve shadowy practices. The exact amounts and origins of donations to political parties or candidates are often unknown. This creates a system that is open to abuse by big business... which contributes money in return for influence.”¹⁵ As a result many Governments around the world have implemented bans or caps on anonymous donations.¹⁶

Additionally, the current threshold for public disclosure is set so high that it facilitates the splitting up of large donations in order to remain anonymous and this is eroding public confidence in our political system. This is evident in the several recent charges made by the Serious Fraud Office in relation to political party donations. The charges relate to splitting large donations up into amounts that sit below the threshold for public disclosure thereby concealing the full amount of the donation and the identity of the actual donors to several political parties.¹⁷ These were not small sums of money but were to the tune of tens of thousands of dollars. Greenpeace argues that setting the threshold at \$100 is low enough to discourage this kind of donation splitting.

Greenpeace also opposes the proposal to “remove the requirement for parties to publicly disclose, within 10 days, the amount donated, and identity of the donor, in cases where the donor has donated over \$30,000 within the previous 12 months.” As noted in this submission Greenpeace recommends a ban on anonymous donations above \$100 and a cap on the amount any individual donor can give at around \$10,000. However, if these changes are not made, then at the very least, prompt disclosure of large donations must remain a requirement.

Furthermore, the Government has in theory banned foreign donations in 2019, but in practice has failed to do so. The Government’s own advice points out, by allowing anonymous donations there is no way to be sure that this ban is being adhered to. Prior to the ban on foreign donations, Ministry of Justice officials stated, in their briefing paper on the issue, that: “Lowering the threshold or banning overseas donations without also amending the threshold for anonymous donations may undermine the intent of the change.”¹⁸ This issue is also raised by IDEA, who state that “it is unclear how a ban on foreign funding can be enforced if anonymous donations are allowed.”¹⁹

We should be able to trust that our elections are safe from foreign interference. Our elections and our democracy should be by and for the people of Aotearoa. By allowing anonymous donations to continue, the Government has kept the loophole open for foreign donations and is thereby risking foreign interference in our elections.

Greenpeace does not believe the anonymity of donors to political parties should continue to be prioritised over and above the need for transparency in our political system, the right for voters to know who is funding political parties, and the need to reduce the risk of foreign interference in our elections. However, Greenpeace does support allowing anonymous donations up to \$100, because smaller donations are unlikely to create

¹⁵ International Institute for Democracy and Electoral Assistance, 2014. “Funding of Political Parties and Election Campaigns A Handbook on Political Finance” pp. V. Accessed 10/1/22 at idea.int

¹⁶ Ibid. pp21

¹⁷ <https://www.rnz.co.nz/news/on-the-inside/442589/sfo-charges-an-indictment-on-political-parties-not-the-system>

¹⁸ Ministry of Justice, 2019 “Impact Summary: Mitigating foreign interference through party and candidate donations”. Pp. 6 Accessed 10/1/22 at justice.govt.nz

¹⁹ International Institute for Democracy and Electoral Assistance, 2012. “Political Finance Regulations Around the World An Overview of the International IDEA Database” pp. 13. Accessed 10/1/22 at idea.int

improper influence on political parties. This will also allow the tradition of small fundraising activities like bake sales and passing the hat around to continue.

Cap the amount an individual donor can donate

*It is not fair "if some in the community use their relative wealth to exercise disproportionate influence in determining who is to govern and what policies are to be pursued"*²⁰

- The 1986 Royal Commission on the Electoral System

We should all be able to trust that our leaders are acting in the best interests of the people of Aotearoa, not in the best interests of those with the biggest bank accounts.

IDEA states that "if large corporations and rich individuals are able to buy greater influence through large campaign donations, then citizens can lose faith in, or be marginalized from, the political process."²¹

Right now, the complete absence of a cap on the amount that an individual, or company, can donate is undermining the integrity and fairness of our political system. Greenpeace Aotearoa recommends that the total amount any one donor can give in a calendar year to a political party is capped. This will help to restrict the influence money has on our political system. Greenpeace recommends this cap should be set around the order of \$10,000.

IDEA states that "sufficient access to funding that is provided with no strings attached is crucial to the overall vibrancy of an electoral and democratic system."²² The Royal commission on electoral system points out that political parties do need sufficient resources to develop and communicate policies to voters.²³

In order to ensure parties have sufficient resources to carry out their role in an MMP system, Greenpeace recommends a mixed funding model where political parties receive some money from donors and some state funding.

ENDS

SUBMITTER INFORMATION

Organisation: Greenpeace Aotearoa, Inc.

Address: 11 Akiraho Street, Mt Eden, Auckland 1024

Email: gtoop@greenpeace.org

Phone: 09 630 6317

Contact: Gen Toop, Head of Campaigns

²⁰ Royal Commission on the Electoral System, 1986. "Report of the Royal Commission on the Electoral System 1986, Chapter 8: Political Finance." pp. 183 Accessed at elections.nz

²¹ International Institute for Democracy and Electoral Assistance, 2014. "Funding of Political Parties and Election Campaigns A Handbook on Political Finance" pp. iii. Accessed 10/1/22 at idea.int

²² Ibid pp1.

²³ Royal Commission on the Electoral System, 1986. "Report of the Royal Commission on the Electoral System 1986, Chapter 8: Political Finance." Accessed at elections.nz

out of scope

From: s9(2)(a)
Sent: Monday, 24 January 2022 10:02 pm
To: electoral
Subject: Submission re Political Donations

SUBMISSION REGARDING POSSIBLE CHANGES TO POLITICAL DONATIONS IN THE ELECTORAL ACT :

I maintain that the most fair and open method is to negate the problem by initiating state funding to political parties for campaigns.

The reasons are obvious and I won't waste your time by stating them.

I do concede the resultant need for vetting of recipients' accounts, and acknowledge the complexities involved.

s9(2)(a)

Proactive Release

Response ID ANON-VKQE-1UU5-7

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-15 15:12:07

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I agree with the proposal to lower the threshold for donations to \$1500. Pubic disclosure at this level will improve transparency.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I agree with all these proposals. Making these requirements will enforce compliance.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think there should be no anonymous donations. I want donors to be publicly known.. Otherwise donors could hide and their identity and possible influence would be unknown.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

There is no mention of donations by businesses. I think there should be no donations from businesses, because of the likelihood of undue influence on political decisions.

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-18 17:48:40

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1 Lowering the threshold helps, but it should be even lower to avoid multiple non disclosable amounts being used. I'd suggest \$500.

2 Increasing frequency helps hold parties accountable in a timely manner BEFORE elections, so support this.

3 This seems the opposite of accountability UNLESS the reporting frequency is at most every 30 days.

4 More details the better especially around the highest donors as to what their vested interests are.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5 Agree

6 100% agree

7 100% agree

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

The amount is important the higher the amount the more important that the public sees who is influencing a party, it's also important that measures are taken to prevent the breaking up of large donations into smaller amounts by using other people's names who aren't donating their own money.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Proactive Release

Response ID ANON-VKQE-1UAY-Q

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-21 21:49:00

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

NA

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Point 01.- Lowering the threshold would not close the major loophole of allowing multiple contributions under the threshold to avoid public disclosure. In the interests of transparency, all donations to political parties and to election candidates should be open to public disclosure irrespective of the sum.

Point 03.- No reasonable argument has been put forward to remove this requirement.

Point 04.- All details about in-kind donations should be open to public disclosure.

General observation.- The proposed changes appear to make an effort towards transparency but, in reality, provide enough wiggle room to enable parties and politicians to avoid real accountability. I believe that all voters have a right to know fully all details of who (and by how much) is providing material support to those who seek to represent them. Anything less is not true transparency.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Points 05, 06, 07 are covered by my previous comments/

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations should be disallowed.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UZA-R

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 16:42:57

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I support 2, and 4, as increasing the frequency of reporting gives more ongoing transparency, as does disclosure of in-kind donations. I add, I would like to see all political parties required to report on all in-kind donations.

I would also like to see:

- political donations to all parties capped at \$1500 per donor.
- all political parties being required to identify donors for donations over \$100.
- all businesses and industry and infrastructure lobby groups banned from donating to political parties.

I believe this kind of approach is necessary to diminish the influence, whether conscious or unconscious on the part of parties and MPs, of wealthy individuals, interest groups and businesses. Democracy is fragile and needs more rules to protect it. These rules should also help restore some equality in our population.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I support 5, 6, and 7 as they should improve compliance, which is clearly needed.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I would support a ban on anonymous donations in the interests of true transparency.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UDV-Q

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-06 23:22:26

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes they would. There have already been several domestic examples of donations being broken into smaller amounts to attempt to flout disclosure. I would argue that the disclosure threshold should be even lower bearing in mind what an average wage earner makes in a year and would be able to donate to a political party would be in the 10s or 100s and not 1000s. And in-kind donations will obviously skyrocket if the threshold is reduced so increased reporting will be required on this.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

This changes will in themselves help to bring the new legislation into the forelight for at least the next decade, and any attempts to claim ignorance in flouting them (as appears common) would become laughable

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Yes, anonymous donations should be done away with as the additional vulnerabilities they afford our often fragile democracy are far to great.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1U55-7

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:52:53

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Our governments have r

Repeatedly abused this area of funding, they constantly get a pass with this fraud, I think that all monies should be documented and a cap of \$1500.00put in place

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

All donations should be named, I see no reason for anonymous donations, the govt is a public servant, not a free enterprise business,, all its dealings are, should be open to public inspection

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

They have to be named. There is absolutely no reason for them

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Pointless and untraceable spending has to stop, the books should be sent to non government accountants that are vetted

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-07 12:07:22

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Change 1/ yes, it would would increase transparency, by removing some anonymity.

Change 2/ might improve transparency depending on timing.

Change 3/ I am worried about this . A donor might be able to make a large donation that could fund advertising within 10 critical days of an election and keep donation a secret until after polling day. Reporting should be within 2 hours

change 4/ In kind donations should definitely be disclosed, and anyone intend to donate in-kind should disclose it beforehand.

Unfortunately, my cynical attitude to those who fund and try to manipulate the electoral system is as a result of underhanded behaviour by some people in the past. Some people have an entitled attitude and believe they can and should manipulate elections.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Change 5/ Yes, those who wish to disclose should be able to.

change 6/ Yes, definitely if disclosure is frequent, and maybe weekly in days before election, and backed up by heavy penalties.

change 7/ Yes, disclosure would help remove suspect dealings

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Freedom and responsibility.

A person should have the FREEDOM to support a party or a position in a referendum, but only if the person is RESPONSIBLE in being open about it.

Sorry if I sound purist.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:59:28

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

The proposed changes would do a little to improve transparency and openness but do not go far enough.

1. The threshold for public disclosure of donations to parties should be lowered to \$100. There is no reason for higher amounts to be anonymous.
3. This proposal seems to be making it easier for parties to hide who their donors are and should be scrapped.
4. All in-kind donations should be fully disclosed publicly.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

These proposals will certainly help support compliance.

On 5.: reporting should be required for all donations over \$100.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Actually, there could be an outright ban on anonymous donations, but perhaps those up to \$100 could remain anonymous. Of course, political parties will resist making donations of more than \$100 publicly disclosable by law, saying they will then not receive sufficient funds to operate. In an open and free society there can be no valid reason to be able to donate to political parties anonymously, as anonymous donations can only really have one aim: to influence a party's politics away from public view, thus giving those who can donate more influence than those who cannot. There MUST also be a .limit on how much individuals can donate to any party and a ban on companies making donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

No donations to parties of more than \$1500.
All donations over \$100 to have full public disclosure.
Donations to parties by companies to be made illegal.
In-kind donations to have full public disclosure.

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:01:09

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, because why should only a few wealthy individuals have so much influence on so many political outcomes that affect everyone?? It should be for everyone who is eligible to vote.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Why should we allow international influences to have a say on what WE do in our own country?? How many other countries allow this to happen to themselves?? Why us!?!?

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-18 18:57:22

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

The thresholds are too high. Anything over \$50 should be reported.

For 3. Why would removing a reporting requirement improve transparency?

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Thresholds are far too high. \$50 max

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

All anonymous donations should be banned.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Donations to political parties should be banned altogether.

Political parties should be publicly financed via taxes.

Response ID ANON-VKQE-1UUAU-K

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-21 19:18:24

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Help2Grow

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1&2 make sense

3 appears to be a relaxing of rules unless Ive missed the more rigorous alternative. Sums of that size must be transparent

4 yes but some care about the thresh hold

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5&6 yes

7 No- other than bankruptcy or dodgy behaviour, candidates financial position is their business- donations etc should be subject to some scrutiny.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

A ban on all anonymous donations is not needed just individually significant ones and or where lots of wee ones from same source

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

You probably can make a case for zero donations and all political activities are funded by the taxpayer which would lead us away from the presidential type of election we seem to be heading towards and by which we are poorly served

Response ID ANON-VKQE-1UX3-8

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-15 21:21:29

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I believe that the current rules for donations to political parties are suitable, but that the problems occur when breaches are found long after they have occurred, and it is too late to rectify any damage to public confidence that has happened.

I suggest that a solution to this problem, and one that would boost public confidence in the donation rules, would be to introduce a system of regular, random audits of the accounts of all political parties by the Electoral Commission.

This would ensure that all parties pay close attention to the donation rules, because they will not know when these audits will happen. Any breaches of the rules will be quickly identified and resolved, rather than being found much later.

All political parties, and the public, will know that the rules are being followed.

Thank you.

s9(2)(a)

Ministry of Justice
electoral@justice.govt.nz

22 Jan 2022

Submission: Political Donations

Q 1: Disclosure rules and thresholds. Yes, I support a lowered disclosure threshold level to \$1500. This will certainly increase transparency of where political parties' donations are coming from. It doesn't mean that individuals/businesses/corporates can't donate to more than one political party, or make multiple donations, but it makes their donation activity and that of their receivers more accountable. It also lines up political party donation thresholds to be the same as for candidate rules.

It will also increase both accountability as well as reporting tasks at the political party level. It may possibly reduce donation levels overall. If you support a particular political party it shouldn't make any difference at all, or how large the donation is – that is simply democratic engagement.

I personally don't think anyone/or vested interest body should be buying favours of political parties to persuade them to deliver policies favourable to the funder/lobbyist's interests, whether funds are given anonymously or not. We know that when it has occurred – eg such as from the tobacco industry, and alcohol industry lobbying, or by the fishing industry lobbying to continue to use seabed bottom trawling or to use cheaper overseas labour – it is neither transparent to the public, nor is the weight of 'evidence' given as so-called justification directly contestable. Direct lobbying actions to persuade uptake of particular activities/policies and providing funding/donations to mask this direction should be banned outright.

Q 2. Proposed changes to reporting. Yes I agree with proposed reporting changes, the given timelines, the requirement for political parties to disclose their financial statements, and that candidate loans are publicly disclosed.

Q 3. Anonymous donations. This is a tricky one. What if someone donates an amount just under \$1500, but intends to do so every month? I support there being a total annual limit on anonymous donations. So in the example given I would expect there to be a named disclosure after receipt of more than \$1500 total per year. This gives consistency and transparency.

Other matters

- (a) Will named donor disclosure lists by the political party to the Electoral Commission and/or any auditor also mean this information is publicly available to individual members of the general public? Would these donor lists and the amounts given by each be attached to annual reports, or would the enquirer have to make an OIA request from each political party?

(b) Why can't donations to political parties be made tax deductible? This might increase the donation rate overall and reduce some of the avoidance steps that are taken to hide these amounts.

Thank you for this opportunity to provide comment.

Proactive Release

Response ID ANON-VKQE-1U5F-R

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:47:53

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I would like to see the following:

- Capping political party donations to \$1500 per donor
- Requiring political parties to identify donors for donations over \$100
- Calling for all 'in kind' donations to be shared with the public
- Stopping businesses from being able to donate

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I support a ban on anonymous donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UWU-9

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 10:47:34

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I dont believe there should be any anonymouse donations ,it should be all above board ,

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

1. Ban all corporate donations
2. Ban anonymous donations over \$100
3. Cap the amount an individual donor can donate

I think all theses hould apply ,please try to make it happen .

Response ID ANON-VKQE-1UVA-M

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-19 14:28:00

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

yes.

At the present time wealthy donors are hidden from view

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

transparency is required at all levels in a democracy

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UT6-7

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-15 16:44:22

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

These changes do not go far enough to create a fair and equitable democracy.

If you have the money, you can donate as much as you like.

We need a cap on donations like Canada. Capped at \$1,500 or whatever amount an average citizen can afford.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

No anonymous donations under \$500. Cap donations at \$1,500

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymity rules should be comprehensive and robust enough so someone can't work around them but donating regularly just under the threshold.

But a cap on donations would help a lot

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Political donations are only part of the issue.

The Electoral Commission must have the power to end arbitrary and exclusionary practices by mainstream media (and community groups) that provide

incumbent parties with significantly greater representation and access to the public.

The 2020 small parties debate was a joke, with Advance NZ only there to provide the comic relief. The Labour vs National debate was a farce, with obvious TV tricks to downplay Jacinda Ardern and uplift Judith Collins. Round robin debates including all parties would avoid this level of media control of our democracy.

Proactive Release

Response ID ANON-VKQE-1UBH-7

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 09:58:06

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

(1) I fully support lowering the threshold to \$1500. At present parties seek to hide the identity of those donating large amounts by breaking donations into smaller amounts to get under the existing threshold. With this much lower threshold it will be much less tempting to try and do this, since it will be much harder to get away with it. This will improve transparency as we will be able to see who is donating to a party, and closely examine any possible quid pro quo.

(4) More disclosure of in-kind donations are also important. Auctions of donated art works, which can be bought at inflated prices, can currently be used to hide large donations. Transparency will be improved if the identity of successful bidders, of bids over the threshold, are required. The donor of the art work is much less important.

(7) Reporting on candidate loans is also important to improve transparency. Otherwise, Donations can be masked as loans of indefinite (possibly infinite) duration.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

None of the above items (5-7) would seem to support compliance. Though item 3 would remove a special case to make all donations able to be reported in the same way, which should make compliance somewhat easier.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think it is overly onerous to have to collect donor information for myriad small donations (say less than \$100). This does allow larger donations to be broken up into smaller ones to get under the threshold, however, if they are truly anonymous, then there should be no way for the party to know if a particular individual has made such a donation. The obvious way that this can be circumvented is using the donation amount. For example, a large donor who wishes to be anonymous agrees to make a hundred donations of a specific amount eg \$89.64. This is an unlikely amount to normally be donated, so could be used by the party to clandestinely check that the secret donation has occurred. This could be mitigated somewhat by banning cents from donations, but that may prove awkward to implement.

It is more important to ensure that other means are not available to obscure donations. For example, a trust accepts donations for some manufactured reason (eg a conservation issue), and then goes on to amalgamate those donations to a single large donation to the party. If the disclosure rules mean that the trust does not have to disclose the original donors, merely the trustees, then it has failed.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I support these changes.

Proactive Release

Response ID ANON-VKQE-1UA7-N

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-21 19:10:26

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

-Ban all corporate donations

-Ban anonymous donations over \$100

-Cap the amount an individual donor can donate

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

-Ban all corporate donations

-Ban anonymous donations over \$100

-Cap the amount an individual donor can donate

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

-Ban all corporate donations

-Ban anonymous donations over \$100

-Cap the amount an individual donor can donate

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

-Ban all corporate donations

-Ban anonymous donations over \$100

-Cap the amount an individual donor can donate

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 18:45:04

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Lowering the threshold is definitely an improvement, but I'm not familiar enough with the existing patterns of political donations to say what the limit should be. Whatever limit is in place, people will probably game the system (e.g. repeated donations of \$1499), so it might as well require full disclosure regardless of amount.
2. What is the current frequency? What would it be increased to? It should be often enough to provide transparency/accountability without creating busywork.
3. This seems contrary to the rest of the proposal.
4. A party shouldn't be able to "hide" donations by having donors pay for events etc. Such things should be treated the same as cash donations.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. As I said before, it's probably worth making all donations reportable.
6. Does this mean the party's tax returns and the like?
7. The relevance probably depends on the type of loan, and whether it's unusual in comparison to the "average" NZer. A mortgage is not remarkable, but holding several mortgages might be significant.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

It makes sense to have thresholds for anonymous donations, but I don't think you should eliminate them entirely. If there's no way the party can trace the source of a donation, then arguably there's no way they can be said to be influenced by it.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

The fact that such things are being discussed is a good sign. We want to minimise the government being influenced by lobbyists behind closed doors.

Proactive Release

Response ID ANON-VKQE-1U31-1

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 20:22:31

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

REPLY:

1, Good.

2, Fine.

3, Against. It would be a loophole for foreign interference in our elections. A New Zealand company may be controlled by or subject to the instructions of a foreign government. As far as I know, the CCP United Front leaders in New Zealand set up and formed many local trusts and companies. So we oppose this amendment.

4, Okay.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5, Good.

6, Good.

7, Good.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

REPLY:

It is right to ban anonymous donations, but there is still a huge loophole where local organisations controlled by foreigners can still donate.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

REPLY:

We request that□

1. Political donations from local organizations controlled by foreigners should be banned.

2. This regulation should be retained: a report must be made by the parties to the Electoral Commission within 10 days if get more than NZD15000 donation from same one.

3. The MMP system should be fixed by removing the right of PR to vote in general elections. New Zealand is probably the only country in the world which allowed Foreign citizens have the right to vote in general elections.

Proactive Release

Response ID ANON-VKQE-1U2U-4

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:42:10

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Transparency and equality are vital if the electoral system is not to be used (and abused) by those with greater economic power than others. I would prefer limits on what a party can spend, regardless of how much they are able to raise from their backers. Then there would be an objective and fair presentation of arguments rather than an advantage to those with access to advertising far beyond the resources of other parties. We have seen examples of lies and 'spin' in other countries - for example, the UK over how much would be saved weekly by Brexit. NZ has an opportunity to avoid similar situations if thresholds and openness are safeguarded here.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I believe that requirements to report would have a beneficial effect on electoral spending honesty.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Complications of origin and authenticity need to be resolved e.g. Trusts, company donations, breaking down amounts into legal quantities to avoid showing an aggregate overall figure. There are too many loopholes for doners to use to evade identification.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UX7-C

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-16 07:32:36

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

(1) Lowering the disclosure threshold and (2) increasing the frequency of donation reporting is a good step towards improving transparency and openness. As is proposal (4).

I don't understand how proposal (3), will improve transparency and openness by removing the requirement to disclose the identity of donor and amount of large donations. Transparency about donations and donors is essential for addressing underlying power imbalances in our society. So large donations in particular should be open and transparent, and the public should have access to this information.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations allow people with wealth and power to exert a greater influence on elections. This is not very democratic when some people are awarded greater influence in elections over others. We must therefore disclose all donations, so that there is a greater public awareness around such power relations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I would really like to see a more fair and open democracy. People with wealth currently have greater access to democracy, and the anonymity that comes with political donations masks this influence from the public. A more open and transparent system would help to increase public awareness.

Response ID ANON-VKQE-1UAE-3

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 01:36:00

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I believe that proposal 1,2 and 4 will help improve transparency. Number 3 sounds as though it is removing the conditions to advise of large donations.

The public should be able to see what party has received any amount of money and how regularly.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

These will allow more transparency. With the public being able to see where the money is actually coming from

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Why would a person or company be wanting to anonymous donate without wanting to hide something. The public should be able to see where the money is coming from otherwise how can we vote on a party fairly if they have a bias we don't know about

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

out of scope

From: s9(2)(a)
Sent: Friday, 14 January 2022 9:28 pm
To: electoral
Subject: Feedback on political donation rules

Dear Sir/Madam,

New Zealand's electoral system is undermining the health of our democracy, public trust in the political system and citizen engagement with the political process. The Opportunities Party submits that significant and urgent reform of our electoral laws is needed.

New Zealand's political system should be based upon the fundamental democratic principle that all citizens have equal political power, with equal ability to contribute to and influence political outcomes. Our electoral laws however utterly fail to uphold this core principle and addressing this should be of paramount importance for the Justice Committee.

In particular, our electoral rules allow money to play too significant a role in our political system which undermines public trust and legitimacy of Government; do not ensure free and fair elections, as they provide incumbents with a disproportionate and unjustifiable advantage which the Electoral Commission fails to mitigate; and the excessively high MMP threshold and paradox of the "wasted vote" fails to deliver a truly representative electoral system.

The Opportunities Party requests the Justice Committee to give due consideration to the issues raised in these submissions, and the proposed solutions in order to protect and restore our democracy.

Kindest regards,

s9(2)(a)

Sent from [Mail](#) for Windows

Proacti

out of scope

From: s9(2)(a)
Sent: Tuesday, 25 January 2022 12:13 pm
To: electoral
Subject: RE Proposed changes to the political donation rules in the Electoral Act 1993

Thank you for inviting submissions on this critically important decision. I call it a critically important decision because it will have a massive ongoing impact on the future of New Zealand and possibly even the entire world in the long run.

I believe that any donation whatsoever to any political party or political candidate amounts to corruption. Obviously, businesses, corporations and wealthy people are the most likely to be able to make significant donations, therefore the parties which promote the interests of these groups will obviously be the ones receiving the most money. Therefore these (usually right wing) parties will have the most money to promote themselves with fancy election campaigns, TV advertisements, etc. To me it seems crystal clear that this is the corruption of political democracy, pure and simple. A classic recent example of this corruption here in N.Z. is the large donations totalling \$40,000 made to the N.Z. First party by Talley's fishing company. The result was that a bill calling for cameras on fishing boats was significantly watered down, and Talley's also sent letters to Nash, Jones and Winston Peters threatening to take legal action against the government over new seabed protection rules in the South Pacific. If that is not bribery and corruption, then what is?

The United States of America has ended up with a limited choice of two corrupt right wing political parties, and this is a significant part of the reason why our planet has ended up in a climate crisis with widespread environmental pollution and devastation, and significant loss of biodiversity. It has been estimated that we have lost 83% of all wild mammals and 50% of all plants. And even worse, academics are now beginning to say that the human species itself is at risk of extinction. Political corruption from business interests here in New Zealand has also contributed to our carbon emissions increasing by 57% since 1990 despite our international commitment to lower them by 5% by 2020. This is why we have poverty, massively increasing inequality, and a major housing crisis. This is why our rivers and coastal waters are dying. Because only the interests of corporations, businesses, and wealthy people are being served.

To me it is blatantly obvious that these problems have arisen because our political system has been corrupted by money. We are rapidly losing (or perhaps have already lost) our own democratic integrity. Democracy is supposed to be rule by the people whereby all of the citizens of a country have an equal say. In America they clearly have a plutocracy or rule by the wealthy. And it seems increasingly that we are headed that way too unless we can stop the corruption by getting political donations (i.e. bribery) out of our political process. If we can achieve true democracy then we have a chance of returning to the fairer and more egalitarian society we were not so very long ago. A society that actually cares about people and the environment rather than kow-towing to pressure from greedy business and corporate interests and their all important profits.

We only have one planet and we simply cannot continue kowtowing to these interests. As nice as it would be to have infinite ongoing economic growth, our planet clearly cannot continue to support this. The reality is that our planet has limited resources which are being rapidly depleted due to our collective greed and thoughtlessness concerning the future of our planet and future generations. It is high time that we pull our heads out of the sand and wake up to this essential fact.

The choice is very simple. We can follow the path that the United States of America has taken of kow-towing to rule by a very small clique of extremely wealthy people over everyone else. This will continue the current patterns of environmental destruction, pollution, and in the not too distant future, complete ecological breakdown and the extinction of many more species including the human species.

Or we can choose political integrity, openness, and true democracy more like the Swiss system perhaps, and inspire the rest of the World by proving that it is actually still possible.

It seems very obvious, to me at least, that the latter path is preferable.

Yours sincerely

s9(2)(a)

Proactive Release

Response ID ANON-VKQE-1UBR-H

Submitted to Proposed changes to political donation rules in our electoral law

Submitted on 2022-01-14 08:52:37

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Things to consider from previous page:

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? YES

Do you think the proposed changes to reporting would help support compliance? YES

What factors do you think are most important when considering changes to anonymous donations? ** I don't believe anonymous donations should be allowed. In this important and potentially influential area, full transparency should be the expectation.

Is there any other feedback you would like to provide on these proposed changes? **Clean it up, level the playing field. Transparency and genuine support for a party should be the benchmark, not people, businesses or other countries trying to buy influence.

Answers from this page:

1. Lowering public disclosure threshold for donations to \$1,500 for parties. ABSOLUTELY

2. Increasing frequency of donation reporting: YES

3. Removing the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000: **There shouldn't be donations over \$30,000. It invites corruption and attempts to buy political influence. If there are donations over this amount, they absolutely should be subject to full disclosure to the Electoral Commission

4. Introducing requirements for parties and candidates to disclose more details about in-kind donations. **YES

If you prefer not to answer this question, click continue to move to the next question.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. Introducing reporting requirements for non-anonymous donations under \$1,500: YES

6. Introducing a requirement to publicly disclose financial statements: YES

7. Introducing a requirement to publicly report on candidate loans: YES

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations invite perceptions that people, businesses, or other countries are able to buy political influence, especially when they involve large sums of money. Transparency is vital to protect our democracy and enable all parties, large or small to compete on a level playing field.

Removal of anonymity is especially relevant as overseas actors become more interested in trying to weaken and destabilise democracies around the world. Aotearoa New Zealand needs stronger protections against this destructive activity.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Ideally, I would like to see all parties given an equal allocation of funds upon which to do their campaigning, and that private donations be ruled out. This would bring true MMP politics into being.

Proactive Release

Response ID ANON-VKQE-1UTE-P

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-16 09:22:14

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

N/A

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes = would improve transparency and openness

1) Yes, a donation is a donation regardless of being a candidate or party and the influence it can "buy" In fact a donation may have more influence at Party level rather than candidate.

2 and 3) Yes for 2 to keep this in the public view more regularly and ok to include 3 if it meets the same requirement as 2.

4) Yes, regardless of being a direct monetary donation or in kind it still has the ability to influence a position

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes = help support compliance

5) Yes, a political party needs to be transparent about ALL donations

6) Yes, this allows the public to have faith the total financial statement of a party isn't "Smoke and Mirrors"

7) This I believe is more problematic, an MP has a certain right to privacy regarding a loan, mortgage from a registered lender, a bank for example. Although this shouldn't extend to being more favorable because they are an MP

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations should be banned for a party represented in parliament. They are not transparent and represent undue influence within a party. If you are willing to donate you should have the courage of your convictions otherwise it allows the possibility the donation is attempting undue influence. If

you wish to remain anonymous become a party volunteer. That someone or some body wishes to remain anonymous is the total opposite to transparent

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Your questions were very specific and perhaps limiting although appreciate their is probably a brief to work within. Some other feedback

- 1) Weight the individual submissions higher than organizations or business in these submissions
- 2) Party Membership fees should be limited to maximum amount per person or company with the amount being less as the party obtains greater membership. This allows smaller parties or non parliament parties to gain sufficient funding, yet not allow large parties to allow individual members or organizations to have undue influence.
- 3) Allow sitting MPs to contribute what ever they like or required to their party, although only while a sitting MP and this is noted in the party financial statements although not specific to what each MP donates.
- 4) Sitting parties should be publicly funded no private direct donations at all. All donations go into a central fund, perhaps allow greater tax break to incentivise and this fund is distributed to all parties. As long as parties receive private donations regardless of laws there will be the ability of undue influence and lack of transparency

Proactive Release

13 January 2022.

PROPOSED CHANGES TO POLITICAL DONATION RULES

s9(2)(a)

Deadline: 25 January 2022

Feedback

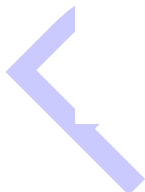
The factors that foster my feedback to the proposed changes to the New Zealand Government's political donation rules are:

- My greater historical awareness of Maori and Crown relations;
- Improved communications; and
- A dominated public of modest means impatient for changes to the desirous attitudes and habits of self-builders of wealth and power.

The changes to the donation rules speak to the sacrifice demanded by all works of governance. The changes move me because I recognise how sharply the riches of the few are in contrast to the values and circumstances which generally colour the dominated public. From a sobering overfamiliarity with their antithesis in domestic life, with sulks and petty disputes, and in politics, with people whose interests crossly decide to pay no heed to the values and circumstance of the public (voters & consumers) and instead cry out chaotically for attention, like jealous and enraged lovers.

The proposed changes to the political donation rules offer a lesson in the benefits of surrendering individual freedom for the sake of a higher and collective scheme, in which all of the people benefit and become better people by contributing to the betterment of Maori and Pakeha. Though the public are creatures inclined to squabble, kill, steal and lie, the rules remind all of us that we can occasionally learn and understand people's ignoble impulses and turn the current inadequate political donation rules into orders that contribute to the appeal of all substantial works of governance and civilisation. So fundamental are the changes that Maori and Pakeha people may fail to grasp their exact meaning; nonetheless, we, the public of modest means, may sense, and delight in, the overwhelming presence of precision and intent to make worthy rules, and wholesome governance that endures.

s9(2)(a)



Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 14:07:56

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Regarding item 1.

It's important for everyday voters to know who the powerful people bankrolling the parties they are considering voting for are. The more money someone gives to a party, the more it indicates that they support their interests and can indicate that they expect the party to act in line with THEIR interests. Ordinary voters should be fully aware of who their chosen party might be financially beholden to. \$1500 is a good amount because most average people can't donate above that amount so it's significant when someone does.

Regarding item 2.

Frequent reporting is good because it means people can't try to slip it in sneakily. Making it more accessible would also be good - having an obligation to publish it somewhere visible to voters not just diehard politicians would be even better.

Regarding item 4.

This is important because support doesn't just come in the form of money, services, barter and influence are all valuable currencies and making sure these have to be announced, it prevents people from hiding anonymous large 'donations' in the form of services, were number 1 to come into effect.

As a voter with an average income and my ability to influence politics being largely limited to voting once every four years, it makes me feel very powerless in our democracy that very rich New Zealanders and companies can hold so much sway by donating large swathes of money to parties and keep it a secret - it feels like there is an entire other system that governs politics and one that most of us don't actually get a part in. My personal preference is that donations are capped, or party budgets are set by the state so all parties have an equal footing but in lieu of that, forcing donors to be public is a good first step. Democracy only functions when those with more resources can't sway it to their favour with those resources.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

That all sounds like a good idea

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think the most important factors for changing anonymity rules is perhaps safety for people who have legitimate reasons for not wanting to appear in public reports (such as people who are hiding from abusers) There might also be a risk of people being harassed in a workplace or social environment if their political leanings are different from the general one of their work/town/clubs. People not participating in democracy because of fear is also bad for democracy.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I'd just really like rich people and rich corporates to stop having such an overstated impact on our political campaigns. New Zealand prides itself on being egalitarian and down to earth but the American influence of 'money talks' is creeping in more and more. As long as people with money have an advantage in supporting their political parties, their interests are going to be more represented than those who don't have money. If we're not going to scrap the donation system altogether then making it clear who is funnelling big money into which pocket is the best next step.

Proactive Release

Response ID ANON-VKQE-1UTN-Y

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-17 08:54:37

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, it should be entirely transparent who is donating to political parties.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

These reporting changes should absolutely happen.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations should be banned. The public should know who is trying to influence policy makers. Even if there is no special treatment happening for donors, the perception of anonymous donations reduces the trust the public has in the leadership of the country.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UDB-3

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-06 17:16:03

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I support the proposed changes, because of their alignment with the candidate donation threshold, improved reporting and removal of the onerous \$30k donor rule

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I support all three proposals, in the interest of more transparency. I volunteer for a political party, and I know that it would be less work to just report all non-anonymous donations, rather than having to aggregate the data (often from multiple sources) to establish the ones exceeding \$1.5k in total.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I support such a ban. While I understand that some donors might prefer to stay anonymous, I don't value that higher than providing transparency and openness to the public. Small donation amounts raised anonymously by cash donations or collections could be reported under the name (individual or organisation) of the event organiser.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I fully support the implementation of all proposed changes in time for the 2023 general election.

Response ID ANON-VKQE-1U63-6

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 11:58:36

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, I support these changes except for (3). The requirement to disclose donations that exceed \$30,000 within 10 days should be retained.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes, I support these changes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Only citizens and permanent residents (potential eligible voters) should be entitled to make anonymous donations, and only subject to the \$1,500 threshold. This would exclude corporations, trusts, and other legal persons that are not a natural person from eligibility to make anonymous donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

These are important changes to protect the integrity of government and the preserve the right of each voter to have an equally meaningful vote.

Response ID ANON-VKQE-1UT5-6

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-16 11:09:48

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Proposals 1 and 2 improve transparency.

Proposal 3 Seems a retrograde step and should be retained and tightened so that donations made by subsidiary companies are included with the parent company.

Proposal 4 In kind donations should be valued and reported on both to the public and the Electoral Commission.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Proposals 5, 6 and 7 would help support compliance.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations should be banned as they can be used to circumvent transparency.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

A public record of all donations over \$100 needs to be set up if there isn't one.

Response ID ANON-VKQE-1UUV-8

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 16:29:45

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Because \$1500 is a paltry sum, all amounts above \$1500 would be caught by the disclosure of the donor, which is the aim of increasing transparency.
2. Frequency of reporting needs to be such that the current situation is current!
3. Logically follows...
4. In-kind donations need to be adequately defined to catch all possibilities - no loopholes.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I think 5, 6 and 7 are all part of the necessary package, if the legislation is to achieve its object.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Whatever the wording, or however it is done, anonymous donations and transparency can not live in harmony!

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UZH-Y

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 10:05:24

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Removing the requirement to disclose to Electoral Commission is going to reduce transparency, it is especially concerning that donor identity and amount exceeding \$30000 can be concealed, potentially opening up opportunities for individual, companies and lobbyists to exploit this as an avenue to influence politicians.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

yes - introducing more reporting will help identifying those who made repeated small donations in order to avoid being shown in reporting. it is also important for parties and politicians to disclose their financial interest so to deter making decisions that would in turn benefiting themselves.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

it should also be taken into consideration that individual should not be using organizations/trusts to hide their tracks in terms of political donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

out of scope

From: s9(2)(a)
Sent: Wednesday, 26 January 2022 12:36 pm
To: electoral
Subject: submission

To: <electoral@justice.govt.nz>

Hello There!

Thank you for inviting submissions on this critically important decision. I call it a critically important decision because it will have a massive ongoing impact on the future of New Zealand and possibly even the entire world in the long run.

I believe that any donation whatsoever to any political party or political candidate amounts to corruption. Obviously, businesses, corporations and wealthy people are the most likely to be able to make significant donations, therefore the parties which promote the interests of these groups will obviously be the ones receiving the most money. Therefore these (usually right wing) parties will have the most money to promote themselves with fancy election campaigns, TV advertisements, etc. To me, it seems crystal clear that this is the corruption of political democracy, pure and simple grim indeed. A classic recent example of this corruption here in N.Z. is the large donations totalling \$40,000 made to the N.Z. First party by Talleys fishing company. The result was that a bill calling for cameras on fishing boats was significantly watered down, and Talley's also sent letters to Nash, Jones and Winston Peters threatening to take legal action against the government over new seabed protection rules in the South Pacific. If that is not bribery and corruption, then what is?

The United States of America has ended up with a limited choice of two corrupt right wing political parties, and this is a significant part of the reason why our planet has ended up in a climate crisis with widespread environmental pollution and devastation, and significant loss of biodiversity. It has been estimated that we have lost 83% of all wild mammals and 50% of all plants. And even worse, academics are now beginning to say that the human species itself is at risk of extinction. Political corruption from business interests here in New Zealand has also contributed to our carbon emissions increasing by 57% since 1990 despite our international commitment to lower them by 5% by 2020. This is why we have poverty, massively increasing inequality, and a major housing crisis. This is why our rivers and coastal waters are dying. Because only the interests of corporations, businesses, and wealthy people are being served.

To me it is blatantly obvious that these problems have arisen because our political system has been corrupted by money. We are rapidly losing (or perhaps have already lost) our own democratic integrity. Democracy is supposed to be rule by the people whereby all of the citizens of a country have an equal say. In America they clearly have a plutocracy or rule by the wealthy. And it seems increasingly that we are headed that way too unless we can stop the corruption by getting political donations (i.e. bribery) out of our political process. If we can achieve true democracy then we have a chance of returning to the fairer and more egalitarian society we were not so very long ago. A society that actually cares about people and the environment rather than kow-towing to pressure from greedy business and corporate interests and their all important profits.

We only have one planet and we simply cannot continue kowtowing to these interests. As nice as it would be to have infinite ongoing economic growth, our planet clearly cannot continue to support this. The reality is that our planet has limited resources which are being rapidly depleted due to our collective greed and thoughtlessness concerning the future of our planet and future generations. It is high time that we pull our heads out of the sand and wake up to this essential fact.

The choice is very simple. We can follow the path that the United States of America has taken of kowtowing to rule by a very small clique of extremely wealthy people over everyone else. This will continue the current patterns of environmental destruction, pollution, and in the not too distant future, complete ecological breakdown and the extinction of many more species including the human species.

Or we can choose political integrity, openness, and true democracy more like the Swiss system perhaps, and inspire the rest of the World by proving that it is actually still possible.

It seems very obvious, to me at least, that the latter path is preferable.

Darkest Regards,

s9(2)(a)

Proactive Release

out of scope

From: s9(2)(a)
Sent: Tuesday, 15 February 2022 1:40 pm
To: electoral
Subject: Proposed changes to political donation rules in our electoral law Submission

Submission as follows:

1. I agree to lowering public disclosure threshold for donations to \$1,500 for parties; I think in fact we should require transparency of all donations over \$100.
2. I agree to increasing frequency of donation reporting.
3. I don't agree with removing the requirement for parties to publicly disclose, within 10 days, the amount donated, and identity of the donor, in cases where the donor has donated over \$30,000 within the previous 12 months. These are substantial donations and the NZ public needs increasing transparency and timely disclosure of all details related to these donations - given they are a political party and NZ's increasing concern in this area.
4. I agree with introducing requirements for parties and candidates to disclose more details about in-kind donations.

I agree with all the recommendations on reporting below:

5. Introducing reporting requirements for non-anonymous donations under \$1,500
6. Introducing a requirement on political parties to publicly disclose financial statements
7. Introducing a requirement to publicly report on candidate loans.

I wholeheartedly agree that we must immediately (before the next election) introduce **ban on anonymous donations**, which would potentially have impacts on transparency and also on compliance and reporting requirements.

I would also submit that it is now, more than ever, essential that all corporate donations are banned. We all deserve to have a say in the decisions made on our behalf - regardless of how much money we have. The world is facing major challenges such as Climate Change and Climate Pollution and degradation that need decisive action. Many would agree it has been lacking for decades due to influence from wealthy companies and individuals who can use their money to influence decisions. Doctors are not allowed to receive donations of gifts yet we allow under the current settings for businesses to

give large political donations to political parties. This risks influencing the priorities that political decisions taken over our environment are based on.

Another additional submission is to cap the amount an individual can donate. Research has shown that around the world, some of the largest polluters are often also some of the biggest election donors. In a healthy democracy, rich individuals and companies should not be able to buy political influence. New Zealanders need to be able to trust that our elected representatives are acting for the health and well being of Aotearoa and its people.

Thank you for the opportunity to submit.

s9(2)(a)

Proactive Release

out of scope

From: s9(2)(a)
Sent: Tuesday, 15 February 2022 1:41 pm
To: electoral
Subject: Fwd: Proposed changes to political donation rules in our electoral law Submission

Submission as follows:

1. I agree to lowering public disclosure threshold for donations to \$1,500 for parties; I think in fact we should require transparency of all donations over \$100.
2. I agree to increasing frequency of donation reporting.
3. I don't agree with removing the requirement for parties to publicly disclose, within 10 days, the amount donated, and identity of the donor, in cases where the donor has donated over \$30,000 within the previous 12 months. These are substantial donations and the NZ public needs increasing transparency and timely disclosure of all details related to these donations - given they are a political party and NZ's increasing concern in this area.
4. I agree with introducing requirements for parties and candidates to disclose more details about in-kind donations.

I agree with all the recommendations on reporting below:

5. Introducing reporting requirements for non-anonymous donations under \$1,500
6. Introducing a requirement on political parties to publicly disclose financial statements
7. Introducing a requirement to publicly report on candidate loans.

I wholeheartedly agree that we must immediately (before the next election) introduce **ban on anonymous donations**, which would potentially have impacts on transparency and also on compliance and reporting requirements.

I would also submit that it is now, more than ever, essential that all corporate donations are banned. We all deserve to have a say in the decisions made on our behalf - regardless of how much money we have. The world is facing major challenges such as Climate Change and Climate

Pollution and degradation that need decisive action. Many would agree it has been lacking for decades due to influence from wealthy companies and individuals who can use their money to influence decisions. Doctors are not allowed to receive donations of gifts yet we allow under the current settings for businesses to give large political donations to political parties. This risks influencing the priorities that political decisions taken over our environment are based on.

Another additional submission is to cap the amount an individual can donate. Research has shown that around the world, some of the largest polluters are often also some of the biggest election donors. In a healthy democracy, rich individuals and companies should not be able to buy political influence. New Zealanders need to be able to trust that our elected representatives are acting for the health and well being of Aotearoa and its people.

Thank you for the opportunity to submit.

s9(2)(a)

Response ID ANON-VKQE-1U5W-9

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 14:27:08

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Not enough improvement of transparency and openness. Few can afford to give \$1,500. \$300 a year would be a more realistic limit, whether in cash, or kind. Those who want to give more than that are likely to be sufficiently committed to be willing to have their affiliation known. Those who give more, but want to be anonymous are more likely to want to improperly influence decisions. Even if 'anonymous' donations are made through the Electoral Commission, there's no way to prevent the donor making known to the politician who made the donation and what benefit is expected. There shouldn't be anonymous donations in excess of \$300. It's not clear from the background papers why the requirement to disclose to the Electoral Commission should be removed. Most funding for political parties should come from taxation and there should be consultation on how it is allocated.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes, yes and yes, but there shouldn't be anonymous donations over \$300 pa.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

There is no way to prevent politicians learning who made the donation and why. At the ballot box all are equal with one vote (except in local elections). Income inequality means that all are not equal. Inequality should be minimised.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Consultations should try to avoid the holiday period.

Response ID ANON-VKQE-1UDZ-U

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-07 15:29:13

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Proposals 1, 2, and 4 definitely will, as they provide much wider disclosure of a party's donations on a much more frequent basis. Proposal 3 seems at-odds with the others - surely it is less transparent and open for the amount of donation by big donors to not be disclosed? This feels like it will lead to a situation where big trusts/co-operatives donate on behalf of others.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

All three proposals will support compliance by bringing more information into the public theatre.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

What is the rationale for people donating anonymously? I can understand some very small donors preferring to not have their political leanings in the public domain --- but this needs to be very carefully balanced with the impact of individuals and companies on our democracy being openly known. Perhaps a limit of \$50/year rather than an outright ban is more appropriate - it would also reduce admin overhead on very small donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

No.

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 10:08:42

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I do not think the proposed changes would enable greater fairness or transparency in NZ Electoral Laws.
I suggest the following changes

*Capping political party donations to \$1500 per donor

*Requiring political parties to identify donors for donations over \$1000

*Calling for all 'in kind' donations to be shared with the public

*Businesses donations subjected to same rules and scrutiny as contributions from
Individual donors

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Number 6 would be useful

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I would support a ban on anonymous donations

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Just to reiterate my previous comment

- *Capping political party donations to \$1500 per donor
- *Requiring political parties to identify donors for donations over \$1000
- *Calling for all 'in kind' donations to be shared with the public
- *Business Donations subjected to same rules and scrutiny as contributions from individual donors

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 11:23:58

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

s9(2)(a)

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I believe that items 1, 2, and 4 will increase transparency and openness because they require more reporting and disclosure. Item 3 would do the opposite, in removing the requirement to disclose the identity and amount for large donations. I believe that all donations to political parties must be disclosed. We have seen again and again that even in democracies, businesses use donations to political parties to try to buy influence and promote government policies favourable to them (for example, the historical example of tobacco companies contributing to US political parties). Item 3 should be revised and all donations ought to be disclosed and not anonymous.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I support these three rules. I believe that the more information is disclosed, the better the public can gage whether a politician is being influenced by financial donations, whether by individuals, interest groups, or businesses.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

We live in a democracy where people and businesses and choose whom to donate to. Every donation ought to be transparent, traceable, and on the public record, to mitigate against the threat of donations corrupting politicians. I personally strongly favour the ban on anonymous donations.

I also favour a ban on donations by corporations, because I believe that they, along with political lobbying by businesses, pose a significant threat to our democracies. I look to the US and Australia and see that donations, especially by corporations, have led to corrupt political decisions, and have prevented legislation that would have helped ordinary people. We have the chance in New Zealand to prevent that kind of corruption.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I see tight regulation around political donations as vitally important to the health and security of our democracy. With most corporations housed overseas, and with foreign corporations able to hide their donations via lawyers and complicated financial transactions, I think that New Zealand needs very strict laws against corporate donations. Our democracy is precious and it relies in part on public trust and goodwill. Politicians being in the pockets of companies - or even being seen as being in the pocket - erodes the community's faith in those very politicians meant to represent us. Now more than ever, we need our democracy to be robust and resilient, and that means having clean politics whose elected officials are above any suspicion of corruption.

Proactive Release

Response ID ANON-VKQE-1UTZ-B

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-15 21:37:29

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes and no. I think it would increase transparency but not enough in my opinion. Certainly lowering the public disclosure to \$1500 is lower than the current amount but I think it still leaves room for multiple donations to be made below the threshold. If it was lowered to \$100 it would make multiple donations that amount to thousands of dollars, to be significantly more arduous to do.

I think ALL 'in kind' donations should be shared with the public.

Businesses should not be able to donate. Businesses donating makes governments biased towards those businesses donating and governments should be independent of influences from businesses.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think they should be banned.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I think it would be a more fair system if there was a cap of political party donations of \$1500 per donor.

I also believe businesses should not be able to donate.

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-21 20:29:38

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I am very concerned about the influence wealthy companies and rich individuals can have on our political system. The current settings allow businesses to give large political donations to political parties. This risks influencing the priorities that political decisions are based on. I would suggest;

1. Ban all corporate donations
2. Ban anonymous donations over \$100
3. Cap the amount an individual donor can donate

Thank you

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I am very concerned about the influence wealthy companies and rich individuals can have on our political system. The current settings allow businesses to give large political donations to political parties. This risks influencing the priorities that political decisions are based on. I would suggest;

1. Ban all corporate donations
2. Ban anonymous donations over \$100
3. Cap the amount an individual donor can donate

Thank you

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I am very concerned about the influence wealthy companies and rich individuals can have on our political system. The current settings allow businesses to give large political donations to political parties. This risks influencing the priorities that political decisions are based on. I would suggest;

1. Ban all corporate donations
2. Ban anonymous donations over \$100
3. Cap the amount an individual donor can donate

Thank you

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 16:49:19

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes. I think this lowers the threshold to a much more reasonable point. I also think the greater requirements for in-kind donations goes a long way to eliminating any potential loopholes

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes! This is much more transparent :D

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think the only way anonymous donations could be allowable is if people made their donations via the Electoral Commission with an instruction to pay them to a particular party / individual. That way, parties would be truly insulated from individual donations e.g. transactions could be aggregated to obfuscate when and how much was donated by an individual

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Perhaps some greater clarity about in-kind donations to family, friends or even business interests of politicians

out of scope

From: s9(2)(a)
Sent: Saturday, 15 January 2022 3:46 pm
To: electoral
Subject: Fwd: Submission on proposed changes to political donation rules

Dear Staff

I'd like to add to my submission - I think the Electoral Commission needs to also make laws that require licencing as a political party of organisations that campaign on political issues but deliberately set themselves up outside of a political party framework so that they can bring in lots of anonymous, possibly foreign funds, that are not subject to the strict rules that political parties have to follow, eg The Coalition for Freedom.

In the UK, groups called 'Political Action Committees' were deliberately formed outside of the political party structure to promote Brexit and were able to pull in vast amounts of funding that had no limits and didn't have to be declared nor the donors named. This has the potential to allow a minority of wealthy people to fund these groups and attempt to upend democracy because they have the money to swamp social media with their messages - we need to do everything possible to stop groups like this in NZ. I can think of, for example, the so-called Coalition for Freedom - it can raise unlimited, anonymous money and make far more noise in proportion to its membership than genuine smaller political parties who have to abide by funding rules.

Legislation could also limit the season for election campaigning of these groups and stop them from taking away the freedom of ordinary citizens by riding motorbikes and taking over public parks like the Auckland Domain and Cramner Square in Christchurch for long periods outside of the election season, which is limiting the freedom of locals to enjoy these precious spaces. There needs to be a distinction between one off 'protest' events and sustained expressions of political opposition, which by its nature amounts to political campaigning. So not trying to stop opposition voices but regulating them to create an even playing field for a range of political opinions to be expressed.

Yours sincerely
s9(2)(a)

Please do not publish my name

----- Forwarded message -----

From: s9(2)(a)
Date: Fri, Jan 14, 2022 at 4:44 PM
Subject: Submission on proposed changes to political donation rules
To: <electoral@justice.govt.nz>

Thank-you for asking for feedback.

1. Disclosure rules & thresholds for political parties

- I think the amount of all donations of over \$100 of either cash, items to be auctioned or tickets "sold" to fundraising dinners or events should be disclosed and the donor identified.
- Businesses should not be allowed to donate, all donations to come from private individuals and private bank accounts so they can be traced by IRD if audits show the same bank account more than once per calendar year.
- Donations should be capped at \$1500 per donor per calendar year, and measures put in place to identify & stop the same donor giving multiple donations of \$1500 in any calendar year.
- The same capped amount of \$1500 should apply to donations to candidates.
- Party candidates should be required to disclose all loans with zero threshold.

2. Reporting & compliance

- Investment should be made into a standard accounting system to track political donations, a system approved by the IRD, that all political parties must use, that is easily audited by IRD via tax receipts issued by the system - I'm sure a company such as MYOB could oblige here.
 - Donors have to set up one profile and one bank account, and declare that the money is from their own earnings and not transferred to them by a wealthy donor seeking to make multiple donations.
- Compliance costs are a red herring - parties should be using a customised accounting programme and employing staff to make sure they are following the rules, smaller parties can surely find a volunteer accountant.
- Parties should disclose their donations at least twice a year, one time being after IRD tax returns are due for businesses, with IRD required to check tax returns for political party donations as they will be given the bank account numbers for all political parties.
 - Parties to be required by law to release their annual financial statements.

3. What factors are most important when considering changes to anonymous donations?

- I think all donations of either cash, items to be auctioned or tickets "sold" to fundraising dinners or events should be disclosed, and only accepted from private donors, as mentioned above.
- The most important factor is to prevent businesses from donating and making sure all donors are disclosed. This will stop a wealthy business owner donating both from his business and from their private accounts, or transferring money to other people to donate on their behalf, which is totally unacceptable in a democracy.
- There should be NO donations from interest groups such as churches and lobbyists. Any donations from individuals using their own money and their personal bank accounts.

4. Other feedback on proposed changes

Just answering your simple four point questionnaire doesn't cut it - it leaves out a lot of potential feedback on specific important issues eg the whole issue of should businesses be allowed to donate. This is **the** most important factor in levelling the playing field.

I think it's better to itemise a lot more points and get feedback on each of them individually rather than ask for general feedback which may not capture the real wishes of the electorate.

Yours sincerely
s9(2)(a)

Please do not publish my name

Response ID ANON-VKQE-1U3Q-1

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 18:35:32

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes. Too easy to bury donations currently.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Lower threshold might make it harder to split donations so they slip under the radar.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

It'll stop people with a vested interest in political decisions from hiding their involvement. Hard to believe some people make big donations without expecting something in return.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Limits should be put on advertising budgets to help level the playing field. People are so easily swayed by persuasive ad campaigns. It's also too easy for parties to manipulate the figures in these campaigns.

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:17:22

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

It is a worldwide phenomenon that political outcomes are skewed towards those with money and lobbying power, this is detrimental to democracy and equality. Therefore it must be regulated to ensure equal access to political parties.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes. Any increase in visibility would encourage politicians to avoid situations which are or appear to be the sale of power.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Firstly only individual voters should be able to donate, not corporates, businesses or groups.
An anonymous donation is a signal that raises suspicion that something is being concealed.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I feel very strongly that parties I have voted for through out my life are more representative of their donors than their voters. It is time for this to be stopped.

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-06 23:57:22

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I think that number 1, 2, and 4 are very good. They would be great for transparency and openness. I'm not so sure about number 3. I suspect that it would still be best to keep the 10 day limit on reporting about large donations like that, especially if the idea is transparency and openness. But on the whole I really like this section.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes! Yes! Yes! Yes! Yes! It would support compliance because it would finally REQUIRE compliance. Yes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

There should not be anonymous donations. I understand the concept of privacy in political leanings, however that is a right for the ballot, not for the finances of politics. If someone is willing to give money in order to support the influencing of others peoples' thoughts and opinions, at that point the expectation to privately donate is not the same as the right to have privacy as to what your cast vote is. Or put another way: the right to privately cast your own vote is not the same as the right to use money anonymously in order to influence the way in which other people vote.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Yes. These changes need to happen. They must happen if this is to remain a democracy. Please make these happen. On 6/12/21 RNZ reported that this submission process is taking place (government-releases-proposals-for-changes-to-political-donations) . In the same article David Seymour is quoted as saying:

"If people think it's a problem that people who break the law are being taken to court, then they don't understand what it is for a law to not be working... The law is working - that's why people are being prosecuted ... we aren't talking about changing the laws around murder because people have been charged with it."

However this is a false logic. Murder and electoral donation laws are not the same because it is not the murderers who write the laws, it is the politicians and legislators who do; so when the person who writes a law then breaks a law this undermines the entire concept of legal legitimacy in a way that a murder (which is inherently outside of law) could never do. Mr. Seymour was using a false equivalency.

If the people who create the laws state that the laws are correct because they are caught and prosecuted for breaking those same laws, then that shows an inherent corruption which must be remedied. If you cannot trust the people who make the laws to follow the laws then the laws mean nothing and in the long term democracy can not exist.

These changes to electoral donations need to happen.

Thank you.

Proactive Release

Response ID ANON-VKQE-1U3T-4

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 21:18:01

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I believe lowering the public disclosure threshold would help increase transparency as it will make it clearer who is funding each party and harder for people to use money to influence political decision making. When you have to be public in your strong support of any one particular party it will hopefully make you think and research the stances of that party as they will reflect on you.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think generally this is a good thing as:

It will ensure those donating are happy to be on record supporting that party (and will hopefully research those parties prior to donating)

Will help prevent those with invested interest in decision making from influencing without note.

The risk is that not everyone is comfortable having their name attached to a donation so might discourage a portion of everyday voters from supporting any party.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I support the idea of limiting donations from businesses (to much chance of influence begin sort).

Even putting a cap on all single donations to something like 5k.

I'm also happy with the idea of a government supplied fund for each party to use in campaigning (monitored of course) with the above suggestions in place for additional funding.

Ultimately smaller donations from a wider range/number of people will increase the amount of reach/work each party has to do to win financial support and will decrease the risk of wealthy people influencing elections cycles.

Proactive Release

Submission on changes to laws around political donations – January 2022

My responses are underneath each of the proposed changes as outlined on this website:

<https://consultations.justice.govt.nz/policy/political-donations/>

(I found this easier to follow in terms of providing feedback than the four questions proposed in the fact sheet, which didn't use the same terminology as below and didn't link back to the webpage above.)

Proposed changes to **disclosure rules and thresholds**:

1. Lowering public disclosure threshold for donations to \$1,500 for parties

I support lowering the threshold from \$15,000 to something more relevant to what the average voter might willingly denote. This change would improve transparency around significant donors to major parties. However, I believe the proposed limit of \$1500 is too low.

I do not think the names of minor donors need to be public. People should be able to donate modest amounts without losing their right to anonymity. This is because some people are in employment e.g. public servants in certain roles, where they cannot declare publicly their political leanings (even though they must declare any conflicts of interest to employers). This means that they are limited to contributing an amount that doesn't require public declaration. This limit of \$1500 would severely curtail their ability to make even relatively modest donations and they would have to watch closely every time they contributed.

I would suggest that the disclosure threshold for small anonymous political donations should be something more like \$3000. This is twice the limit for candidate donations and in relation to the electoral cycle is \$1000 per year for three years. Lowering the limit further (e.g. to the suggested \$1500) would severely impact the modest donations on which some small parties rely. Small parties are an important part of our democratic process.

2. Increasing frequency of donation reporting

Be aware that small parties could be more impacted by donation reporting requirements as they cannot afford the same paid support that the main parties have. However, in general there could be justification for major parties to report more transparently and more frequently so that elections are fairer and voters are aware of who the major donors are.

3. Removing the requirement for parties to publicly disclose, within 10 days, the amount donated, and identity of the donor, in cases where the donor has donated over \$30,000 within the previous 12 months

\$30,000 is a significant amount to donate within a 12 month period (given the average wage) and I think such amounts should be disclosed promptly and within a meaningful time limit given the election cycle and the 3 month spending restriction. I suggest that the report be required within one month of the \$30,000 trigger, as that would make it within a typical financial reporting period where monthly updates are common. This would ensure that there was reasonable awareness of major donors. As the parties receiving most of these donations are large, well-financed and with

support teams, this is not onerous. Small parties would have comparatively modest numbers of these donations to disclose.

4. Introducing requirements for parties and candidates to disclose more details about in-kind donations.

In-kind donations should be treated, as much as practical, exactly the same as monetary donations and so details should be subject to the same reporting requirements. Most things have a market value that is relatively straightforward to confirm. Any attempts to get around the electoral rules governing donations should be able to be investigated. We need to ensure that parties cannot hide the true nature of their political support and particularly those involving significant donations often made to support particular self-serving agendas.

Proposed changes to **reporting**:

5. Introducing reporting requirements for non-anonymous donations under \$1,500

I wasn't sure in what circumstance there would be a non-anonymous donation under \$1500.

I presumed that all donations under a disclosure threshold could be assumed to be anonymous even though using bank transfers etc makes them discoverable.

Requiring disclosure of the volume and total dollar amount of donations under the threshold for anonymity is appropriate but as stated earlier I think the limit of \$1,500 for parties is too low.

However, it would be useful to know the number and total amount of small donations to each party.

6. Introducing a requirement on political parties to publicly disclose financial statements

I support all political parties publicly disclosing their financial statements

7. Introducing a requirement to publicly report on candidate loans.

I support all political parties publicly reporting on candidate loans

We are also interested in your views on whether or not to introduce a **ban on anonymous donations**, which would potentially have impacts on transparency and also on compliance and reporting requirements.

I DO NOT support a ban on anonymous donations.

I do not think the names of minor donors need to be public. People should be able to donate modest amounts without losing their right to anonymity. This is because some people are in employment where they are not able to declare publicly their political leanings. This means that they are limited to contributing an amount that doesn't require public declaration.

It would not serve the public interest to have a complete list of all the donations made to political parties, which would be the result of a ban on anonymous donations. It is also not practical as every donation will need to be recorded.

General comments related to political donations

New Zealand's political system should be based upon the fundamental democratic principle that all citizens have equal political power, with equal ability to contribute to and influence political outcomes.

Our electoral rules allow money to play too significant a role in our political system. Parties that are willing to make deals in the interests of their corporate donors are advantaged, while those who work to improve the position of the disadvantaged are unable to secure funding from their poorly resourced supporters and rely on publicly minded benefactors, most of whom are not rich.

The current rules around almost unlimited donations do not support free and fair elections, and are compounded by other rules related to the allocation of broadcasting spending and clever use of Parliamentary Services resources by incumbents. These all conspire to provide incumbents with a disproportionate and unjustifiable advantage, which the Electoral Commission fails to mitigate.

Our electoral laws do little to address political equality and do not mitigate against the imbalances of financial resources between citizens, let alone the significant wealth of private corporate interests and lobbyists who ordinary citizens also have to compete with. This puts significant influence in the hands of wealthy donors who have a greater capacity to donate, influence political outcomes, and determine who will govern the country than ordinary citizens do.

New Zealand's electoral laws place no limits on the amount of money a party or candidate can receive, or the amount any individual or group can donate (excluding foreign/anonymous donations). There are simply reporting requirements for donations above defined levels, and the inadequate spending limits only apply to a short 3-month period prior to an election. Even the weak attempts to limit spending for the three months before an election come with a number of exceptions (including surveys or opinion polling, travel and some labour), meaning those with significant funds can continue to spend above the upper limits, reinforcing the advantage of their superior financial position.

New Zealand needs to take steps to limit the dominance of wealthy donors and protect political equality through caps on campaign donations, ideally similar to those used in Canada which restrict donations to private citizens. The lower the limits, the more citizens have an equal financial capacity to contribute to the campaigns of their choice and impact political outcomes. This would also prevent parties or candidates from being overly reliant, and therefore more susceptible to the undue influence of, a smaller number of large donors.

The higher than recommended MMP threshold adds to the advantage of incumbents as the paradox of the "wasted vote" fails to deliver a truly representative electoral system.

Response ID ANON-VKQE-1UZJ-1

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 19:42:28

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes. I want to see what companies/people are contributing anything meaningful (frankly I think this amount should be even lower) to the various political parties, so that I know where their interest might lie.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

The only thing that matters to me are whether specific individuals are put at risk (mental, physical, etc) for having to disclose their donations.

I do not care if it puts companies profit or public perception in jeopardy.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UDJ-B

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-08 10:02:38

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, especially any consideration of removing anonymity from donations and lowering the threshold for disclosure.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

The argument for anonymous donations is weak, large donors seeking anonymity should be questioned on their intent and the relationship they have to the party they are donating to.

Money has a large and outsized influence on power and politics, NZ is a democracy so why should any one citizen have and outsized influence and be able to exercise that influence anonymously.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

The removal of anonymous donations is the best step that can be taken to improve transparency.

Response ID ANON-VKQE-1UZW-E

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 14:18:15

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I support all these changes except #3. Tightening the donation rules is an appropriate response to the experience over several elections of parties engaging in dubious fundraising which is not transparent. The public should be able to easily tell who is donating to political parties and engage in action based on that information.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes. These all increase transparency and improve the quality of the candidate and political party fundraising system.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

They should be banned. There is no justifiable reason for people to be able to donate anonymously or through a third party organisation such as a trust. All donations should be attached to a named individual and that information should be publicly available.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UU3-5

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 15:21:00

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Set the maximum allowable donation per donor at \$2,000 annually
2. All donations must be reported
3. Disclose all donations and donor names to the Electoral Commission
4. Disclose all in-kind donations and donor names to the E.C.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. See previous page
6. Yes
7. Yes

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

To be banned

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

A measure of a political party's viability is the financial support it gets from members.

The party's membership and the amount of annual contributions paid by members will determine the party's expenditure.

The current system, allowing big money to hugely influence the outcome of elections, is corrupt and effectively negates the democratic principles of our electoral laws.

Proactive Release

22nd January 2022

Ministry of Justice
Wellington

By email to electoral@justice.govt.nz

**SUBMISSION ON:
THE PROPOSED CHANGES TO POLITICAL DONATIONS RULES**

Contact details for this submission are:

s9(2)(a)

GENERAL COMMENTS

1. I do not believe the proposed changes go far enough. It stands to reason that any political donation undermines the basic democratic principle of one person – one vote. In effect, those with the financial resources to donate or raise loans are influencing outcomes beyond that of their one vote. This is illogical and effectively introduces a bias against those with little or no capacity to donate. The beneficiaries are those with the capacity and will to donate. I believe that all political donations and loans raised, whether by parties, candidates or third parties, particularly for election campaigns, should be banned and election campaigns wholly funded from government revenue (i.e. the taxpayer).

SPECIFIC COMMENTS ON PROPOSED CHANGES

Disclosure rules and thresholds:

1. Lowering public disclosure threshold for donations to \$1,500 for parties.

I strongly support public disclosure of all donations irrespective of whether they are used for election campaigns or otherwise.

2. Increasing frequency of donation reporting.

I strongly support weekly reporting and public disclosure of donations to parties and candidates.

3. Removing the requirement for parties to publicly disclose, within 10 days, the amount donated, and identity of the donor, in cases where the donor has donated over \$30,000 within the previous 12 months.

I strongly oppose this proposal. Each donation should be disclosed publicly as to the donor and the amount including in-kind donations and within a specified timeframe (7 days).

4. Introducing requirements for parties and candidates to disclose more details about in-kind donations.

I support this proposal assuming 'more details' means the donors name, and in the case of a business or other entity, the name of the donors contact person, the value of the donation and any specific conditions or proviso's.

Proposed changes to reporting:

5. Introducing reporting requirements for non-anonymous donations under \$1,500.

It is not clear whether 'reporting' includes public disclosure. As above, I strongly support both reporting and public disclosure of all donations (and a ban on anonymous donations).

6. Introducing a requirement on political parties to publicly disclose financial statements.

I support this proposal provided all donations are clearly coded. But a timeframe has to be applied that is both practicable for the party and meaningful for the public.

7. Introducing a requirement to publicly report on candidate loans.

All my comments above relating to donations to parties apply equally to election candidates.

8. We are also interested in your views on whether or not to introduce a ban on anonymous donations.

I believe that anonymous donations whether financial or in-kind, and whether to parties or candidates must be banned.

The International Institute for Democracy and Electoral Assistance (IDEA) provides some useful comparisons, particularly in relation to donations and loans to political parties and candidates, as well as reporting and public disclosure of these. See

<https://www.idea.int/about-us#node-13> For example <https://www.idea.int/data-tools/question-view/527>

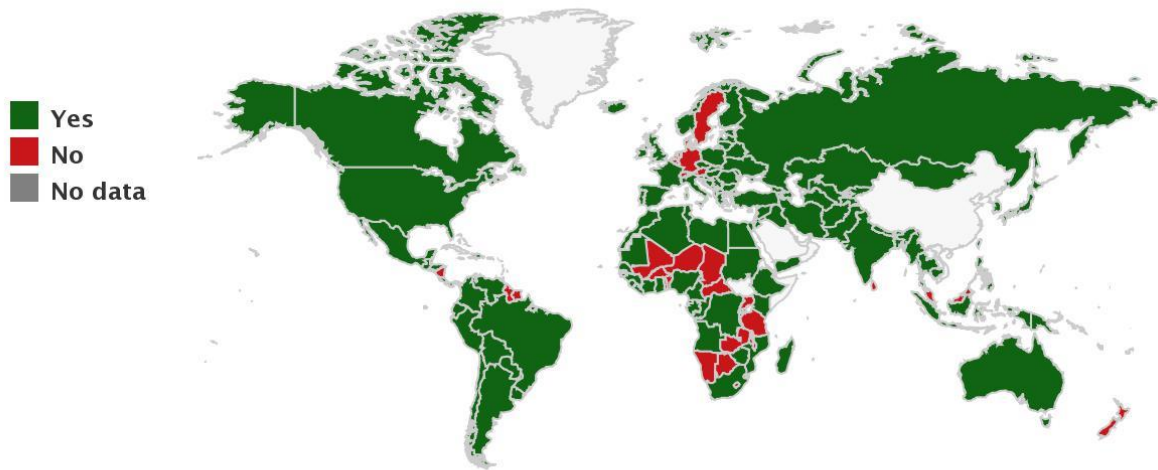
All the maps below are sourced from the International Institute for Democracy and Electoral Assistance website.

Further submission points are in **RED** above each of the map images below. The numbered questions above each map are from the International IDEA.

Election (and non-election) donations from foreign interests should be banned.

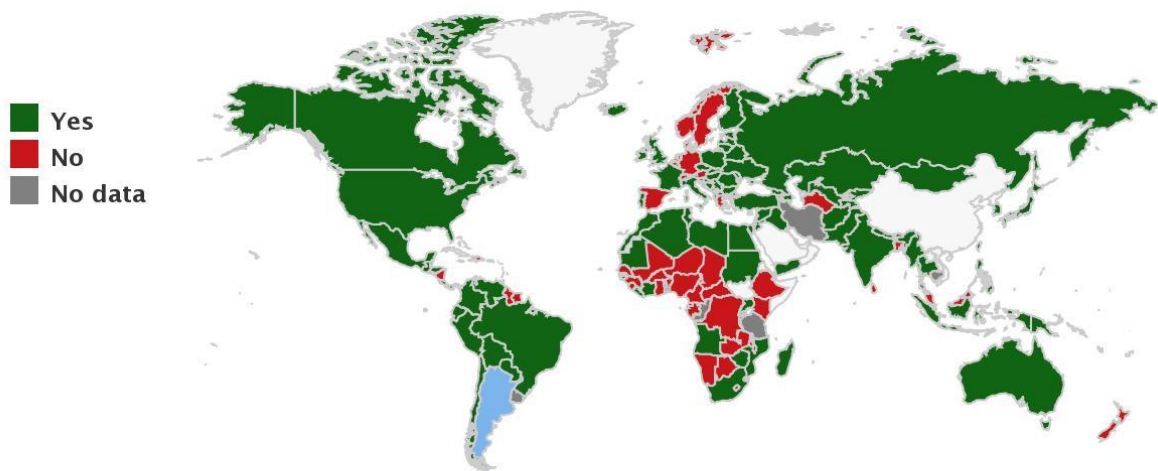
1. Is there a ban on donations from foreign interests to political parties?

Political Finance Database – Bans and limits on private income



2. Is there a ban on donations from foreign interests to candidates?

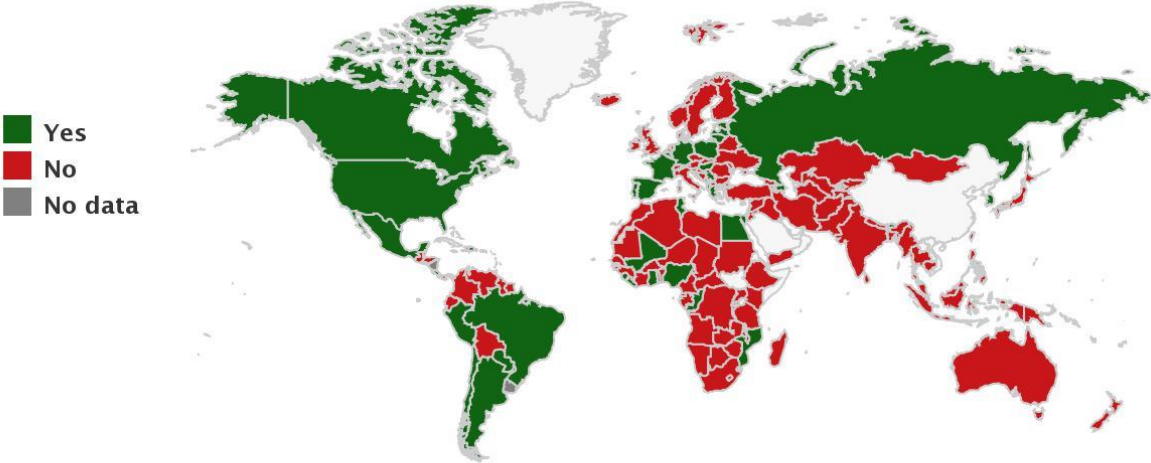
Political Finance Database – Bans and limits on private income



Election (and non-election) donations from corporations should be banned.

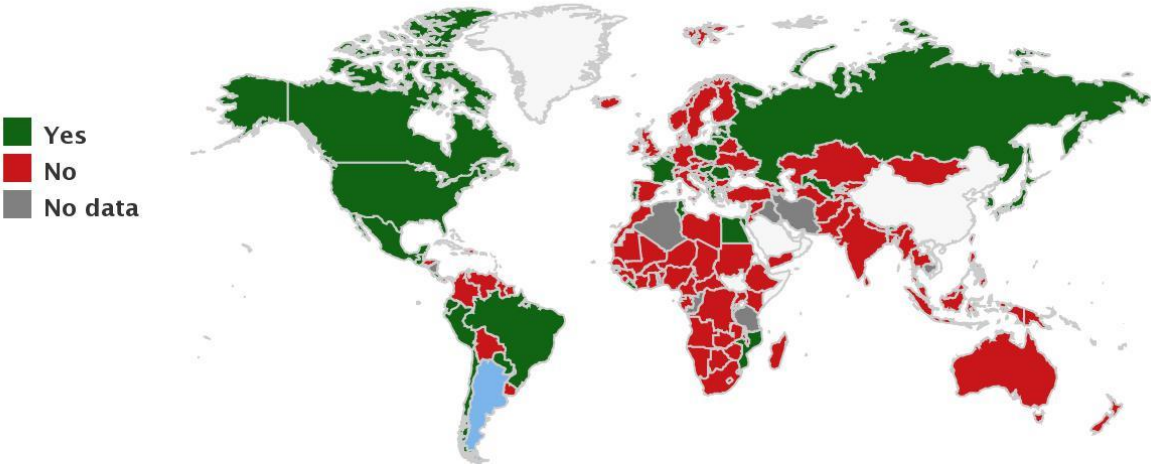
3. Is there a ban on corporate donations to political parties?

Political Finance Database – Bans and limits on private income



4. Is there a ban on corporate donations to candidates?

Political Finance Database – Bans and limits on private income

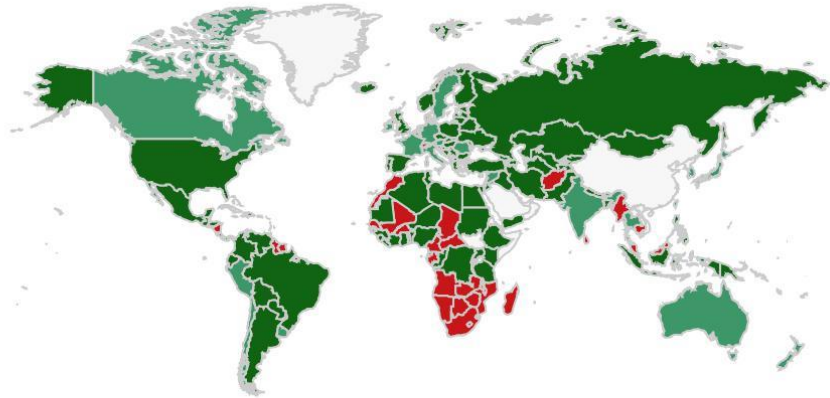


Anonymous election (and non-election) donations should be banned.

7. Is there a ban on anonymous donations to political parties?

Political Finance Database – Bans and limits on private income

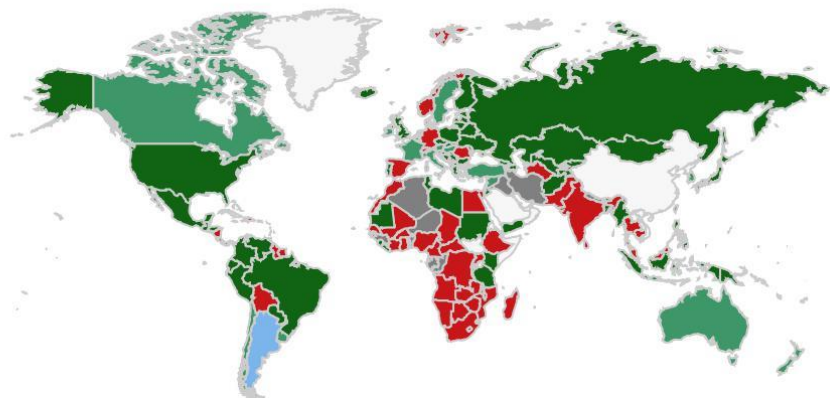
- Yes
- Yes, above certain threshold
- No
- No data



8. Is there a ban on anonymous donations to candidates?

Political Finance Database – Bans and limits on private income

- Yes
- Yes, above certain threshold
- No
- No data

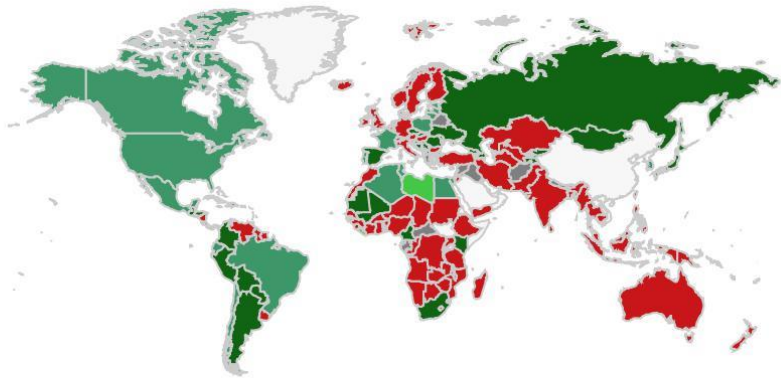


If donations are not completely banned, there must be limits on donations of any type from any source with the limit set at \$1000 increasing with CPI annually.

16. Is there a limit on the amount a donor can contribute to a political party during an election?

Political Finance Database – Bans and limits on private income

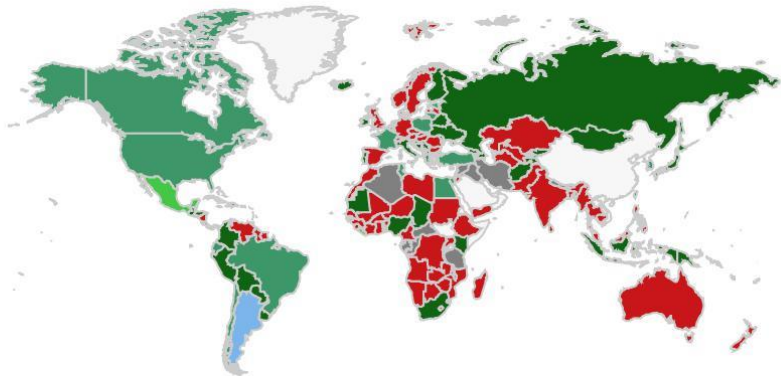
- Yes, for both natural and legal persons
- Yes, for natural persons
- Yes, for legal persons
- No
- No data



18. Is there a limit on the amount a donor can contribute to a candidate?

Political Finance Database – Bans and limits on private income

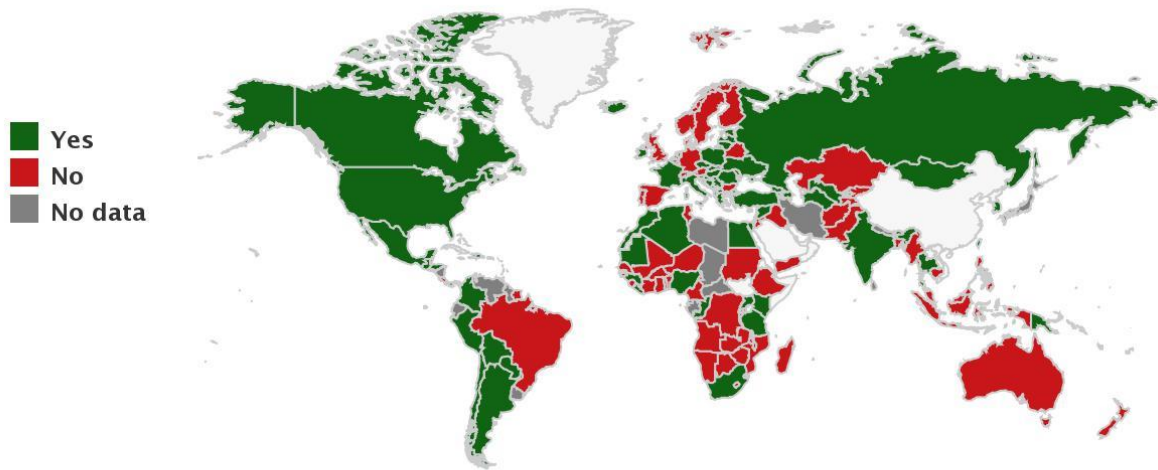
- Yes, for both natural and legal persons
- Yes, for natural persons
- Yes, for legal persons
- No
- No data



In-kind election donations should be banned.

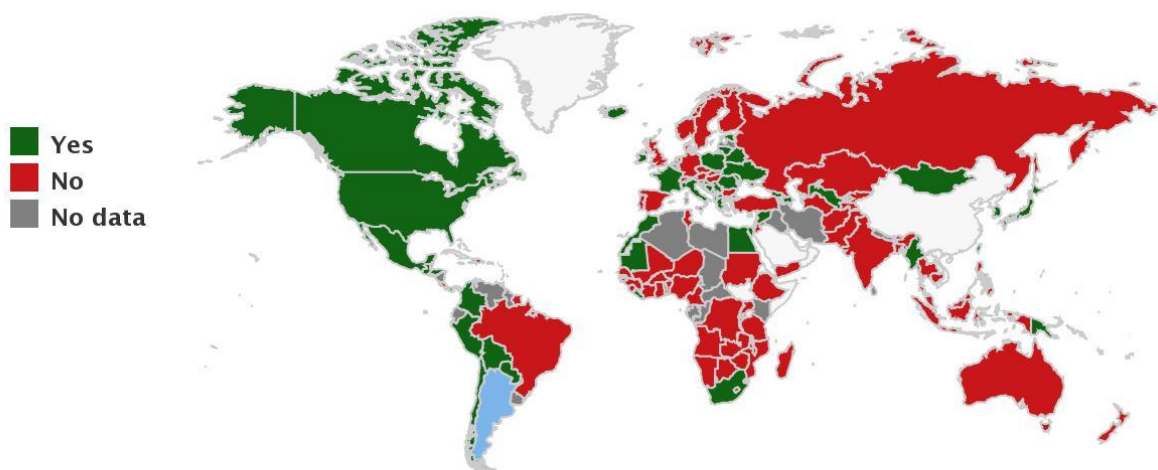
21. Is there a limit on in-kind donations to political parties?

Political Finance Database – Bans and limits on private income



22. Is there a limit on in-kind donations to candidates?

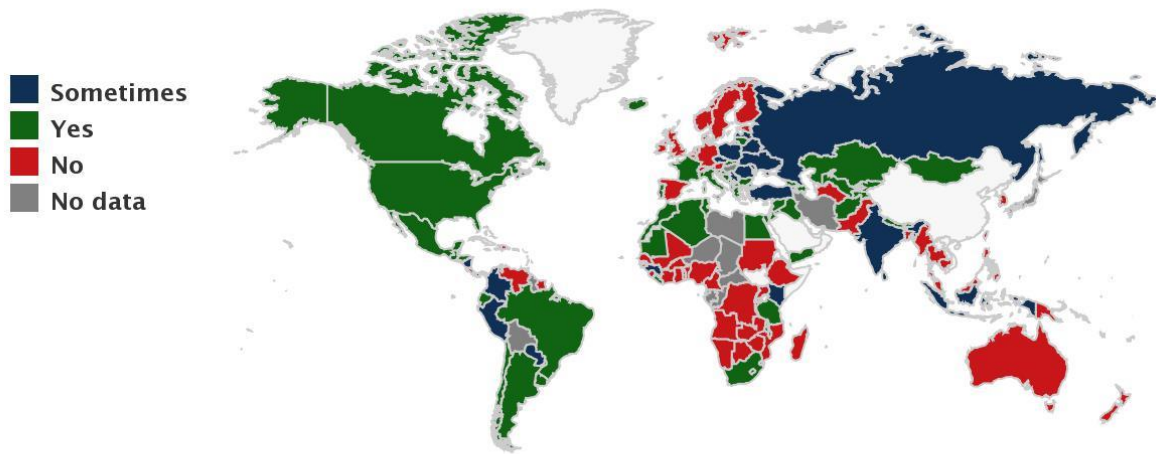
Political Finance Database – Bans and limits on private income



Any donations, if permitted, must go through the banking system.

27. Are there provisions requiring donations to go through the banking system?

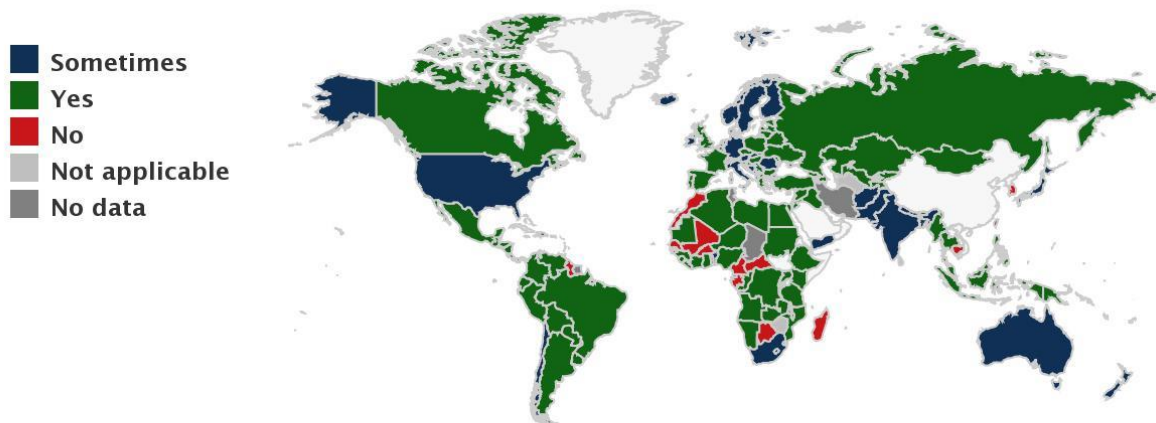
Political Finance Database – Bans and limits on private income



If donations are permitted, reports must reveal the identity of donors and be made public.

52. Must reports from political parties and/or candidates reveal the identity of donors?

Political Finance Database – Reporting, oversight and sanctions



out of scope

From: s9(2)(a)
Sent: Thursday, 13 January 2022 1:27 pm
To: electoral
Subject: Fwd: Political donations

I agree with what Kassie of ActionStation says.

----- Forwarded message -----

From: **Kassie - ActionStation** <team@actionstation.org.nz>
Date: Thu, 13 Jan 2022 at 09:09
Subject: Political donations
To: s9(2)(a)

Kia ora s9(2)(a)

A fair and flourishing Aotearoa is possible when everyone has a say in how our country is governed, regardless of how much money they have.

But right now, our laws enable our wealthiest few to have a stronger voice on the issues that political parties represent through political donations.

Political parties are able to accept large donations, and only need to let the public know if it exceeds \$15,000. The current rules allow for parties to accept 'in-kind' donations (such as cash for access dinners, or donations of goods for auctions) without a public declaration. Fraudulent behaviour has been found with political parties across the board which means these laws are important to hold our politicians to account.^{1, 2, 3}

When the people with the most are allowed to offer large donations and influence political parties, it shapes the choices of our decision-makers.

We need a political system that is fair and transparent and represents all of us, regardless of how much money we can donate to political parties.

The good news is that right now, there is an opportunity to change the law, and level the playing field.

The Ministry of Justice have opened public submissions on their changes to political donation rules - but only until January 25th.

[Have your say on fairer political donation laws now.](#)

If you value a vibrant, transparent democracy, you may want to talk about:

- Capping political party donations to \$1500 per donor
- Requiring political parties to identify donors for donations over \$100
- Calling for all 'in kind' donations to be shared with the public
- Stopping businesses from being able to donate

[Send a submission now using the online feedback form.](#)

Or, send your submission by emailing electoral@justice.govt.nz.

Make sure that you get your submission in before 5pm, January 25th. [More information can be found here.](#)

Ngā mihi,

Kassie and the team at ActionStation

References:

1. [Donations and loans](#). *Electoral Commission*, 2022
2. [Serious Fraud Office charges six people over 2017 Labour Party election donations](#). *Stuff*, 13 May 2021
3. [Former National MP Jami-Lee Ross' fraud charges move to High Court](#). *Stuff*, 8 July 2020

[ActionStation](#) supports everyday New Zealanders to act together to create what we cannot achieve on our own: a society, economy and democracy that serves people and Papatūānuku. We receive no corporate, lottery or government funding, and every campaign we run is entirely supported by voluntary donations. If you'd like to contribute to help fund ActionStation's work, [please donate now!](#)

If you do not wish to receive updates, please [unsubscribe](#).

Authorised by ActionStation, 39 Webb Street, Wellington 6011. [Our privacy policy is here](#).

[Donate Now](#)



--
Warm regards,
s9(2)(a)

Response ID ANON-VKQE-1UUN-Z

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 17:05:01

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, strengthening disclosure rules would aid fairness and democracy.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes but make the recipient groups responsible for reporting not small donors

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

The aim is transparency. Donating should not bring favours to donors by way of policies or benefits

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

The balance needs to be changed so that wealthy groups do not have undue political influence

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 18:58:06

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Proposal 3 appears to reduce transparency.

Why would you remove this obligation?

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

We should ban anonymous donations.

New Zealand is too vulnerable to overseas money.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Item three appears to reduce transparency.

We should make all efforts with reporting to capture any foreign influence in our elections, including funds funnelled through locals and their businesses.

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 15:11:54

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, I think numbers 1, 2 and 4 of these proposed changes would improve electoral transparency and openness.

1. Would significantly increase the number of identified donors to parties.
2. Would make it much easier for the Electoral Commission to keep up to date with the donations a given party has received, or is currently receiving.
4. Would hopefully ensure that the Electoral Commission could determine the (at least approximate) cash value of in-kind donations.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Because political donations by individuals will almost always reflect the voting practices of those individuals, any requirements to publish amounts and donor identities of donations to political parties will have to be balanced against the benefits of preserving the democratically-desirable 'secret ballot' nature of NZ's elections.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

s9(2)(a)

25 January 2022

Kia ora koutou,

Submission on Proposed changes to political donations rules in our electoral law

Introduction:

The proposed changes are minimal and cosmetic. Putting lipstick on a pig would be an accurate description.

They will not address the threat to our democracy from the 1% and their political representatives in the major political parties.

For example there is nothing in these proposals which would deal with the cynical, egregious behaviour of Christchurch mayor Lianne Dalziel who filed an election return which declared her husband as the donor for \$1000 in auction goods (mainly bottles of wine) and the \$39,100 raised from the auction.

Section A2: Candidate Donations (Other)				
List here details of any other donations received that exceed \$1500:				
Date Received	Name of Contributor	Address of Contributor	Description of Contribution	Amount
12 Aug 2019	Robert Davidson	[REDACTED] Christchurch	A fundraising dinner and auction was held by my husband Robert Davidson. The auction items were donated by Robert Davidson.	\$39,100.00
14 Aug 2019	Robert Davidson			\$1,000.00
	Total from Robert Davidson			\$40,100.00
19 Aug 2019	Countrywide Property	[REDACTED] Christchurch	Donation	\$6,500.00

When challenged by myself and local media Dalziel finally produced a list of six donors who paid more than \$1500 for bottles of wine.

Wei Min Lu (\$17,850 donation)
Yong Jiu Chen (\$3920 donation)
Zhi Cheng Tan (\$2800 donation)
Jianping Wang (\$2350 donation)
Grandland Investment/Bing Chen (\$2950 donation)
Yang Xia Wu (\$1750 donation)

These names should have appeared on Dalziel's election return. In the subsequent investigation the Serious Fraud Office said they couldn't identify evidence of intention to mislead by Dalziel and declined to prosecute. This despite the mayor's explanation – she is herself a lawyer with decades of experience running local body and national political campaigns for election – lacking any shred of credibility.

Put simply our current election donation laws are weak and easily evaded and when politicians are caught out they are not treated seriously by our watchdog organisations such as the police and the Serious Fraud Office.

Our election system and our democracy are too important to be undermined by donors and political parties who go to extraordinary lengths to keep their donors hidden from us. We should know all their names. If this means political parties have more trouble raising funds that is no restriction on

democracy – it just means they will have to spend money more carefully and provide decent policies to gain political support. In any case their hands are already deep in the public purse to pay for their political advertisements.

Our response to the proposals:

Regarding the proposed changes to disclosure rules and thresholds.

1. We propose that there be no anonymous donations and that all donations should be declared by a party one week BEFORE election date.
2. We propose that ALL political donations should be publicly notified – down to the last dollar. The electoral commission should maintain a publicly available spreadsheet for each registered political party which the party is required to update on a weekly basis, and a daily basis during election campaigns. A political party must not be able to accept any donations for a political campaign in the final week of the campaign with rigorous safeguards built around this.
3. All citizens should know who is paying for the spreading of political messages BEFORE we vote. At the moment donation and expenses returns are filed many months after elections when it's too late to be of value to voters.
4. We also propose we should follow Canada's example and set a maximum annual amount from any individual or corporate donor - \$1000 would be a sensible amount for Aotearoa New Zealand.

Regarding changes to reporting:

1. Our response is contained above. ALL donations of any size should be reported and declared publicly at least one week BEFORE an election.
2. We agree that political parties provide audited financial statements which are publicly disclosed each year.
3. The issue of a party "borrowing" money to run an election campaign is not acceptable. Such "loans" could be paid back by big anonymous donors well after election expenses returns have been filed and voters have been screwed without anyone knowing about it.

Finally...

The main political parties will strongly oppose our proposals because they are happy to work in a murky grey area where they can bend and twist electoral law to keep voters in the dark. Lianne Dalziel's behaviour is a good example.

It's important to remember that some decades back Labour and National were mass based parties with hundreds of thousands of members. Today they are hollow shells which rely on large corporate donations to run election campaigns rather than the cake stalls and raffles of the past. Now as like never before our democratic values and political polices are up for sale to the highest bidders. It's time to take our democracy out of the hands of our political parties and their big business friends and put voters in the front seat.

Nā,

s9(2)(a)

Response ID ANON-VKQE-1UUT-6

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 17:02:32

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, I agree with 1-4 so that the wealthy donors are more transparent and the parties that are not well resourced have a better chance to compete.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

All good

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

No donations should be anonymous. All donating should be transparent

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

In the past it is alleged that the Brethren Church and other groups have hidden their involvement in politics while spending large amounts of money at election time on promoting a political ideology that benefits specific political parties. In some instances it is alleged that one organisation that spent a great deal of money to support a specific political agenda hid the source of the political pamphlets and some of the addresses on the political campaign documents were empty buildings.

There needs to be guidelines, accountability and control over any religious, wealthy or powerful organisation or individual in New Zealand and overseas to stop them from flooding the country with political literature that supports specific political parties. This literature is in essence a donation to those political parties that the literature supports.

Proactive Release

Response ID ANON-VKQE-1UVK-X

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-18 09:29:53

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

These changes are a drop in the bucket of what's needed to create a fair democracy. We need a cap on donations like in Canada. Capped at an amount an average citizen could afford.

We need stricter spending limits for parties, so each party has a fair chance and incumbents aren't unfairly advantaged.

Parliamentary Services funding needs to be restricted, and calculated towards both donations received by the party, and spending limits for costs incurred.

The Electoral Commission should take responsibility for ensuring free and fair elections, which requires the Justice Committee to propose changes to the criteria that determines the allocation of broadcasting funding.

Direct the Electoral Commission to end arbitrary and exclusionary practices by mainstream media (and community groups) that provide incumbent parties with significantly greater representation and access to the public.

Until these fundamental changes are made to donations & spending, you're just tinkering at the edges with these proposals, and you won't see the real change in our democratic system you appear to be seeking.

I don't understand the reasoning for 3. Removing the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000. this seems to be heading in the opposite direction to helping improve transparency and openness?

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

seem like a good direction, but 5 is useless unless you remove the ability to provide anonymous donations. just makes it look more like a PR stunt that you are improving accountability but not really

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

i think they should be banned.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1U2H-Q

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:32:41

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

No, need to limit donations to \$2000 and no donations from any business

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations should be banned

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1U3K-U

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 19:18:18

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1, Yes the public disclosure should be reduced to \$1500

and

2 Frequency of reporting should be increased and

4 parties and candidates must disclose more details about in-kind donations.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

7, candidate loans need to be visible

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations over \$100 need to be reported and multiple donations from the same source need to be reported

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

The legislation MUST stop businesses from buying influence

Response ID ANON-VKQE-1UTM-X

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-16 11:18:16

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, I agree with proposed changes, as I think they will lead to greater transparency, honesty and less corruption or one sided influencing

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes, I agree with proposed changes, as I think they will lead to greater transparency, honesty and less opportunity for corruption or one sided influencing

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Excellent idea. I agree with the above for the same reasons of limiting corruption or one partisan influencing

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I love this petition

Response ID ANON-VKQE-1UA9-Q

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-21 20:55:49

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes. Large donations are influencing and especially influencing in politics.

Political parties should align their supporters and be transparent.

Besides, large donations come from people or organisations that have the capacity to do so - the wealthy. This means they are more likely to be heard and have their needs met. That's only encouraging inequity.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes. It's important as voters and NZers that we know who political parties align with to determine if they share our values.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

That transparency is important in a democracy.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UB7-P

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 09:08:40

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Democracy needs openness and transparency to thrive. Revealing and limiting special interests attempts to subvert the political process is vital. As such donations should be limited 1500, which seems reasonable, and declared. You just have to look at other jurisdictions like the USA to see what lobbying does to democracy. It is toxic to it.

In kind donations seem particularly pernicious a virtual implication of expected quid pro quo and such should be completely declared if allowed. The value too should be treated as a cash donation and limited thereby.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Obviously all donations should be declared (I understand the need for a under 100 dollar exception but multiple donations to the same Party should count as one) for without openness donations become bribes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Not allowed under any circumstances ever. This is poison to good governance.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

No business or charitable donations. Businesses should not seek special favours and charities should stick to their charitable business or pay taxes if they seek to influence political parties with money that hasn't been taxed.

Response ID ANON-VKQE-1UVS-6

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-17 09:01:31

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

All political donations, monetary or service need to be registered with each party, a central agency, and be clearly transparent to all. The opportunity to influence political parties in our democracy through political donations is a threat to our way of governance. Registration and transparency are essential to preserve our system.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes. The more transparency the better.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Please ban anonymous donations. They can too easily bypass safeguards and transparency.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UV1-4

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-18 13:58:35

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes. 3. becomes redundant if 1. and 2. apply.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. and 6. 7. too far

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Ban would provide ultimate transparency attached to each donation (with accountability of individual donor not under cover of company/organisation name)

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UD1-J

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-07 09:41:18

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Proposal 1: Yes. Lowering the threshold to \$1,500 would increase transparency and openness. The current threshold is too high. Powerful family cheat the system and this can result in massive donations made under family and friends names. 15k buys a lot of ads and if a family of 4 decide to each donate that much anonymously, then that group has influence over public servants that make laws.

I think this limit is okay, but it could be lower - say \$900 or so. The reason for this is purely based on how much ads you can buy on social media for that price point. The less anonymous the more we can see who are the people funding these cheap ads (compared to classic TV or radio).

Proposal 2: Yes. We should increase reporting frequency to weekly. This is not a massive burden because a well run party can make a spreadsheet and have an admin person run it weekly. I'm a software developer, I'd even argue for real-time reporting as donations occur but weekly seems reasonable to smaller parties.

Proposal 3: If increased reporting frequency is less than 10 days then this could be removed. However, if proposal 2 is higher than 10 days then we need this rule. This can lead to situations where during the last couple of weeks a big donation is made and the information might not be public in a timely fashion to allow the media to report on it.

Proposal 4: Yes. This is critically important especially in cases of non-residents offering in-kind donations. Our politicians can take money from foreign actors to try and pass favorable laws for them instead of the people of NZ.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes. This information would be helpful so that media can report on the finances of each party. Money can make all the difference to a political campaign, especially in the world of social media.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think that under a threshold we should be able to have anonymous donations - simply for administration burden. We should discourage people from donating to parties however we should limit the influence a wealthy family/friends can impose on our politicians. If a powerful family of 4 is able to donate 60K anonymously under today's rules that is a problem. It can buy a lot of influence. If the threshold is 4k, then that buys significantly less anonymous power. This can let the media report on conflict of interest when a politician is perusing law change.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Yes.

Can you also consider banning foreign donations entirely and donations that come from a company/trust/non-natural entities that are majority owned by foreign interests.

This loophole allows our politicians to be bought by foreign companies that want to exploit our country. Foreign money has no place in NZ politics.

I would also urge the commission to impose AML/KYC checks on large donations/loans as this seems like an avenue that can be used for money laundering. The AML threshold could be something like 20-50k donations/loans. This affects a very small amount of donors but is critical to the integrity of politics.

Proactive Release

Response ID ANON-VKQE-1UBT-K

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 17:02:49

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

A vibrant democracy requires transparency in donations to political parties. It is too easy for people to 'buy' influence, and we need transparency around it.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

yes

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

It has to be practical and easy to manage reporting as well as to enforce compliance. Managing this could create hardship for those who who are new to politics, perhaps \$500 should be the limit

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UVH-U

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-17 17:30:35

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I don't think think the proposed disclosure rules and thresholds will improve transparency and openness enough. There will be unintended ways round.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Again, they will not support compliance enough.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

State funding of elections would make a ban unnecessary and remove the issues transparency and compliance.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

This morning I read a book review ...

https://www.theguardian.com/books/2022/jan/13/how-civil-wars-start-by-barbara-f-walter-review-sounding-the-alarm?Ref=email&utm_campaign=139500_Sunday

Democracy is now under such threat that tweaking the the rules around political donations is too little too late.

Link to article.

Response ID ANON-VKQE-1UBK-A

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 09:51:04

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Nelson Tasman Climate Forum, Zero Carbon Nelson Tasman, Our Climate Declaration.

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Rules 1 and 4. I favour the highest possible level of public disclosure of donations. I would prefer a system in which election campaigns are publicly funded with no private funding.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Rules 5,6,7. I favour all these rules, because they enable implementation of the disclosure rules.

Rules 6 and 7 would apply if election campaigns were to be publicly funded with no private donations, which is the policy I most favour.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

If there are to be private donations (I favour none under a publicly funded system) there should be no anonymous donations. We, the public, have a right to know who might seek to influence an election and subsequent legislation. The maintenance of democracy demands transparency on efforts to influence.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Aotearoa scored well on measures for low corruption. A publicly funded election system would further enhance this aspect of our national values.

Response ID ANON-VKQE-1U6D-Q

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 10:03:52

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Any changes would improve transparency and openness but what has been proposed is very inadequate compared to many other countries. Businesses should not be allowed to donate and the maximum donation should be \$1500. There should be more frequent donation reporting including all sorts of in-kind donations (example: farmers putting up billboards along main roads.)

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes improved reporting and disclosure rules are very important.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Those who donate money expect to get a big return on their investment and usually do.

If this did not happen they would not continue to give money. It is important for the public to know who are buying Government policies and decisions if larger amounts are being handed over. Anonymous donations up to \$50 or \$100 could be acceptable.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

New Zealand needs to be brought in line with other similar countries and rules introduced that are much stricter than those being proposed.

Response ID ANON-VKQE-1UWM-1

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-23 11:47:38

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, I think this will be a great way to ensure political parties not to be persuaded or manipulated into agreements that do not support public interest but benefit corporate agendas.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Definitely, this has to be in place to support the public.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Transparency is key, there shouldn't be allowed any anonymous donations at all.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1U5M-Y

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:38:36

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

NA

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

YES.

1- yes.Hope it is per identifiable donor. So worse case even if it is split in different names, it may be picked up.

2- yes.No point in finding out annually or after elections.

3- Not sure why it is being removed. I believe it needs to continue.

4. absolutely yes. Calling for all 'in kind' donations to be shared with the public over \$100.

think we need to add

-donations over \$100 - we need to identify donors.

-Stopping businesses from being able to donate since we vote as individuals and this is in the spirit of democracy.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. Hard to monitor. If it is a donation ,any over \$100 (anonymous or non-anonymous, cash or kind).

6 & 7 yes

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

If they go about a bag and collect money for donations whilst door knocking it would get hard to get details. So best have a min amount of say \$100 value when it cant be anonymous and needs to be with details and be it cash/kind.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

business should not be able to donate since democracy is based on individuals.

Proactive Release

Response ID ANON-VKQE-1UZC-T

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 21:57:14

Have your say

Tell us about yourself

What is your full name?

Name:
Freeman Yu

What is your email address?

Email address:
nzva4u@gmail.com

Are you providing feedback as an individual or on behalf of an organisation?

Organisation

What is the name of your organisation?

Organisation:
New Zealand Values Alliance

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

- 1, Good.
- 2, Fine.
- 3, Against. It would be a loophole for foreign interference in our elections. A NZ company may be controlled by or subject to the instructions of a foreign government. As far as I know, the CCP United Front leaders in New Zealand set up and formed many local trusts and companies. So we oppose this amendment.
- 4, Okay.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

- 1, Good.
- 2, Good.
- 3, Good.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

It is right to ban anonymous donations, but there is still a huge loophole where local organisations controlled by foreigners can still donate.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

1. Political donations from local organizations controlled by foreigners should be banned.
2. This regulation should be retained: a report must be made by the parties to the Electoral Commission within 10 days if get more than NZD15000 donation from same one.
3. The MMP system should be fixed by removing the right of PR to vote in general elections. New Zealand is probably the only country in the world which allowed Foreign citizens have the right to vote in general elections.

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 18:42:17

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I think all political donations should be cut off completely. Otherwise there will always be opportunities for misuse and corruption which has been happening by all major parties up until now. If we look at how corrupt the United States political system is, we can see how most of their politicians serve their donors and not their constituents. We must protect New Zealand's democracy so it serves all citizens equally. Not large multi-national and domestic corporations, foreign governments and a few wealthy individuals.

In this modern digital age why are donations necessary to get their message out during campaigning.

Just broadcast it on TVNZ. Have it on social media and TVNZ On Demand. Use media and journalism students if there's a shortage of budget or available people to create the content. Would be a great opportunity for them to show what they can do.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

This must be totally transparent. We need to know who is donating so we can try to find out their motives behind the donations.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations must be banned to protect our democracy.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UDY-T

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-07 11:24:50

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Not Answered

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I do not consider that any anonymous donations are appropriate and serve true democracy. They leave too much room for manipulation of monetary support.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I believe there should be a cap on donations which is the same for major parties and proportional for minor parties

Response ID ANON-VKQE-1UT2-3

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-16 23:35:52

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Lowering the public disclosure threshold for donations to political parties to \$1,500 makes sense. Higher than that, and there's too many secretive back-door shenanigans the put our democracy at risk.
2. Increasing frequency of donation reporting seems to make sense. I'd be in favour of that.
3. Why the heck would you remove the requirement to disclose to the Electoral Commission within 10 days, the identity of donors/amounts over 30k? That's increasing the backdoor-shenanigans index!
4. I'm strongly in favour of introducing requirements for parties and candidates to fully disclose all their in-kind donations. That kind of thing is anti-democratic backdoor shenanigans central, so putting it in the spotlight would hopefully cut way down on that.

And while we're at it, why not introduce a rule making it impossible for businesses to donate. Just individuals only. And I'm personally in favour of all donors of amounts over \$100 being disclosed.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. Good idea.
6. Great idea. Can't believe that's not a thing already.
7. Absolutely.

Would these changes help support compliance? Are you joking? Of course, by their very nature they would.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Yes. No-one should be allowed to donate to a political party, individual etc. anonymously. If you believe in your party enough to want to financially support them, you should be proud to say that you're doing that. Only people/business with shady backdoor political shenanigans in mind would want to hide that they're financially supporting a political party.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

More openness and honesty and transparency = good.

More limitations on amounts able to be donated = good. (Otherwise the rich get to own the politicians in order to get richer, and in the course of history, this has pretty much ALWAYS led to abuses of power, the rich getting richer while the poor get poorer, and environmental abuses. All terrible things for New Zealand/Aotearoa and the world.

Proactive Release

Response ID ANON-VKQE-1UW1-5

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 16:11:38

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I think the proposals are too timid. I think Public disclosure for Party donations should be required at \$200. We've seen parties trying to scam the system by breaking up donations now. Let's make it really difficult for them to be dishonest.

Large donations over \$30,000 need to be publicly disclosed asap.

I agree with other suggestions.

My prime focus is to limit the ability of "big donors and off shore sources," to buy political influence.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

As stated, the focus has to be to limit the purchase of political influence.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations can come in the form of cash or items that may be sold for cash. Artworks for example.

In a fair and open democracy, anonymity hides influencers and corruption. It is not to be permitted.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I've had my say. Many thanks for the opportunity!

Response ID ANON-VKQE-1U6J-W

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 19:47:29

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I agree that a ban on anonymous donations should be put in place, voting for a political party needs to be based purely on votes NOT money/donations or biased paid for promotion.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1U5P-2

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:29:33

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Making them not anonymous for donations above a low threshold, say \$100.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I like what you are proposing. We need more transparency on political donations in order to protect democracy.

Response ID ANON-VKQE-1U6U-8

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 14:25:04

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Q1: This will improve transparency by substantially discouraging corporate/high net worth individuals from making multiple anonymous donations [of \$14,999].

Q2: Reporting of total donations, perhaps quarterly or at specific times of the electoral cycle, should be much more effective than the 10 day reporting of individual donations.

Q3: Covered [as I understand] by answers above.

Q4: Agree this proposal.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Q6: Agree as parties will be well aware that an audit will show any discrepancy in donations.

Q7: While I'm not sure about compliance I totally support the resultant transparency of this proposal.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I consider reporting on very small donations [say under \$100] might be an admin headache, especially for small parties that may have many and rely heavily on these.

Reporting of very small donations would be burdensome for the minor parties while the majors will not need to solicit/record these.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I really appreciate the opportunity to comment - thanks.

Proactive Release

Response ID ANON-VKQE-1UVM-Z

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-19 14:54:39

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Answering Q. 1,2,4.

Yes. At present donors can hide their identity. They can split donations and make it appear that they have originated with different donors. The limit for non-disclosure is presently too high.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Agree with 5 and 7. Would improve transparency.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Transparency is the most important.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UW8-C

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 14:26:12

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

These look like they are going in the right direction except for point #3 "Removing the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000" which seems to be heading in the opposite direction, ie towards less transparency, so I'm not happy with that one. Is the wording correct?

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

"Introducing a requirement to publicly report on candidate loans." can this be expanded to include other kinds of non-cash donations? We have had fringe benefit tax for many years now so we know how to value these things. If someone donates a venue for a political meeting it is still a donation and ought to be reported.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Ideally there are no anonymous donations, but the practicality of tracking every small donation is a challenge. Not as much of a challenge as it was before everything was computerised though.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Businesses can make political donations. This is wrong. They don't get a vote, so they shouldn't be able to donate. Business owners, of course, do get a vote and ought to be able to donate.

Some businesses donate to both main parties on the pretext of enhancing democracy. Sure they do. Seems more like they want to ensure they have

friends in power regardless of the election outcome. I guess individuals might do the same, but it seems like more of a temptation for businesses.

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-06 21:31:24

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

In general I believe that votes and donations should not be anonymous. Anonymity in political participation serves those who want the protection of privacy for their acts of corruption and against public scrutiny.

Proposal 1 would improve transparency and making it harder to donate large amounts anonymously.

Proposal 2 would also improve transparency since frequency could tie donations with a political party's rhetoric. As a citizen I could be better informed on why a certain narrative is being pushed.

Proposal 3 I do not fully understand. How is "Removing the requirement to disclose to the Electoral Commission" improve transparency? Doesn't this conflict with proposal 2? I would not remove this requirement.

Proposal 4 All type of donations should be treated equally. That would help with transparency.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I hope that Proposals 6 and 7 would be introduced and enforced. Whether or not the parties will follow these requirements is up to the Justice Department. I believe this should support compliance as long as the penalties are strict, and the accounting is robust and performed by a third party chosen by the Ministry (or the opposition).

I highly support a ban on all anonymous donations to the political parties.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I support a ban on anonymous donations.

I believe that political parties need to be transparent on all accounts with who they accept donations from, AND who they reject.

This is an essential change needed for a democratic and honest election.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1UX6-B

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-08 16:31:30

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

na

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. The proposed lower threshold should assist, and could be lowered to \$1000. Smaller donations should be exempt so as not to catch your \$10 bill handed in at a meeting.
2. the donation reporting should have a frequent enough requirement to avoid donors potentially evading disclosure.
4. I agree with in-kind donations be made public as any benefit should be disclosed.

In case it is not mentioned later in the survey I believe there should be a requirement for political parties to disclose when donations have effectively been split to avoid the disclosure thresholds

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. There needs to be a meaningful threshold so that the like of cake stalls and minor cash donations do not need to get caught in the bureaucracy
- 6 & 7 these folk should be introduced for the obvious purpose of adding to transparency

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Donations above the threshold for disclosure should all need to identify the donor to avoid any suggestions of corruption

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I am concerned that for example the liquor industry, and the communications industry appear to give large sums of money to both parties so their motive clearly is not to support any political party but to ensure that they receive favourable treatment for their proposals in the future, no matter who is in power. This effectively amounts to bribery to candidates for a favourable result in the future. As an example the Law commission's well reasoned suggestions on steps necessary to reduce New Zealand's alcohol problem were basically pushed aside by whatever party was in power. We seem also to be seeing favourable immigration decisions based on political donations

Proactive Release

Response ID ANON-VKQE-1UXG-V

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-15 10:22:43

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

fdfdsfsa

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

FDSAFDSAF

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

FDSAFDSA

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

FDSAFDSA

Response ID ANON-VKQE-1U3Y-9

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 21:26:56

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Lowering public disclosure threshold for donations to \$1,500 for parties - should be lowered to \$100 and should cap political party donations to \$1500 per donor
2. Increasing frequency of donation reporting - agree, suggest monthly but need to include a running total for the year at each reporting time.
3. Removing the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000 - disagree with this change.
4. Introducing requirements for parties and candidates to disclose more details about in-kind donations. Full details should be provided.

Businesses should not be allowed to donate.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. Introducing reporting requirements for non-anonymous donations under \$1,500 - should be lowered to \$100 and should cap political party donations to \$1500 per donor.
6. Introducing a requirement to publicly disclose financial statements - agree
7. Introducing a requirement to publicly report on candidate loans - agree

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Agree with a ban.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1UUM-Y

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 16:52:20

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Proposal Number One: Lowering it to 1,500 is a step in the right direction, so I will have to agree to it.

As and aside: I consider all donations should be declared, no matter the size.

Party donations scew the political process in favour of those who can afford to donate more, especially while parties are allowed to employ sophisticated public relations professionals and advertising agencies.

At the very least it should be transparent.

Proposal Number Two: Yes. See above for reasons.

Proposal Number Three: Donations should be disclosed, especially these large ones.

Proposal Number Four: Yes. See reasons under Proposal Number 1.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Number 5: They should all be reported for transparency.

Number 6: Yes, for transparency.

Number 7: Lots of scope for murky dealing here, so yes.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

In a democracy we need to be able to see who our political representatives are beholden to.

(Ideally there should be no donation system at all, in the interest of a level playing field).

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Thank you for considering my submission.

Proactive Release

Response ID ANON-VKQE-1UUW-9

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 16:08:28

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Proposal 1. would improve transparency & openness

Proposal 2. might not improve transparency & openness unless the frequency was increased to weekly, fortnightly, or monthly.

Proposal 3. should only be accepted if it is combined with a _general_ reporting frequency increase to once per month or less, otherwise it should be left in place.

Proposal 4. There should not be a concept of "in kind" donations.,

ALL donations OF ANY KIND valued at over \$100 should be reported in the same manner. This includes donations of time, materials, cash, bonds, equipment, meals, transport, etc, basically ANYTHING given to a political party that is worth over \$100 needs to be reported. Time should be charged at at _least_ the average commercial charge-out rate for the type of work being done.

In general, donations of over \$100 should not be allowed to be anonymous and should be declared. Honestly, I don't think ANY donation to a political party (or a religious organization, for that matter) should be allowed to be anonymous AT ALL, but I can understand the difficulty in properly reporting small sums of cash collected in buckets and the like.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I think all four proposals here are good ideas, but NONE of these changes support COMPLIANCE. To support COMPLIANCE you need ENFORCEMENT.

Again, in general, NO donation to a political party should be allowed to be anonymous, and ALL donations over \$100 should be reported.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I agree completely with a ban on anonymous donations, no person should be allowed to assist a political party without declaring who they are publicly. The public deserve to know who is supporting a political party,

Although as mentioned for small donations of under \$100 the reporting requirement may be too onerous, so not needing to to report donations worth less than \$100 might be acceptable.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

It would be good to consider banning of donations from companies, as well as donations from non-New Zealand citizen sources.

Only those allowed to vote in NZ elections should be allowed to donate to political parties in New Zealand.

Proactive Release

Response ID ANON-VKQE-1UB2-H

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 21:15:15

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, but they don't go far enough to creating a fair and transparent democracy - see below.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes, but they don't go far enough to creating a fair and transparent democracy - see below.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Yes, anonymous donations should be banned, without question.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

These changes are a drop in the bucket of what's needed to create a fair democracy. We need a cap on donations like in Canada. Capped at an amount an average citizen could afford.

We need stricter spending limits for parties, so each party has a fair chance and incumbents aren't unfairly advantaged.

Parliamentary Services funding needs to be restricted, and calculated towards both donations received by the party, and spending limits for costs incurred.

The Electoral Commission should take responsibility for ensuring free and fair elections, which requires the Justice Committee to propose changes to the criteria that determines the

allocation of broadcasting funding.

Direct the Electoral Commission to end arbitrary and exclusionary practices by mainstream media (and community groups) that provide incumbent parties with significantly greater representation and access to the public.

Until these fundamental changes are made to donations & spending, you're just tinkering at the edges with these proposals, and you won't see the real change in our democratic system you appear to be seeking.

Proactive Release

Response ID ANON-VKQE-1UWW-B

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 17:45:20

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

No.

Ok for 1. A reasonable level of donation for public disclosure.

OK for 2.

Definitely not for 3. Disclosure required and the limit should be reduced to \$5000.

OK for 4. In Kind donations can be quite significant and should be accounted for.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes in all the above cases.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

There should be no anonymous donations full stop.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UAN-C

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 08:23:29

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1,2 and 4 would increase transparency and openness.
Number 3 would decrease transparency and openness.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5, 6 and 7 would increase compliance. That is good for our democratic system as it makes it harder for wealthy individuals and companies to exert covert influence on parties and politicians. It is becoming more important as we now have developed a larger number of super-rich people and companies. If small anonymous donations are allowed, it will allow a loophole where many small donations could be given by one person or company which add up to a lot. Publicly anonymous donations can still be privately known to the donee (receiver)

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations are very dangerous to the democratic system as they can be a loophole for exerting influence on parties and politicians. Although donations may be publicly anonymous there are ways of making the donor known to the receiver. A democratic system thrives on openness and transparency and anonymity is the opposite of that. We have a safe electoral system- no one need fear for their life - so public disclosure should be the way we operate. Money buys electoral advertising, road trips, staff, goody bags etc which increases the chance of winning votes. It also can be used to buy politicians loyalty and their commitment to causes important to the donor. Just look at all the failed and/or dangerous states overseas.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I would like to stress how important it is to retain transparency and openness in our electoral and political system. We must NOT follow other countries who have, for example, allowed corporations to act like people and give donations to politicians and parties.

Anonymous donations are not necessary for our democracy to function.

All donations should be declared. Rather than wait, the declaration should be done promptly. With computers and good systems this could practically be automatic. There is no excuse for tardiness.

There is no requirement or benefit to New Zealand as a whole for huge donations from one person or company to a politician or political party. The opposite is true- there is more likely to be disadvantages to the country as a whole when just a few people influence what decisions are made. Donations to parties/politicians (whether of money or in kind) can cause this to happen.

By donation I mean money, loans, in kind or anything that brings tangible benefit, such as free accommodation or luxury boat trips.

We are all human and susceptible to bribery.

Proactive Release

Response ID ANON-VKQE-1UUB-M

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 14:55:28

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Fully support lowering threshold for all donations

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

If made illegal to donate over \$1500 anonymously

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Would make it difficult when "the hat is passed around" for low level donations or for similar low level raffles etc

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

No

Response ID ANON-VKQE-1UZE-V

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 16:55:07

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I do not believe the proposed changes go far enough.

It stands to reason that any political donation undermines the basic democratic principle of one person – one vote. In effect, those with the financial resources to donate or raise loans are influencing outcomes beyond that of their one vote. This is illogical and effectively introduces a bias against those with little or no capacity to donate. The beneficiaries are those with the capacity and will to donate. I believe that all political donations and loans raised, whether by parties, candidates or third parties, particularly for election campaigns, should be banned and election campaigns wholly funded from government revenue (i.e. the taxpayer).

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I strongly support weekly reporting and public disclosure of donations to parties and candidates. ALL donations should be fully transparent.

For in-kind donations, reporting should include the donors name, and in the case of a business or other entity, the name of the donors contact person, the value of the donation and any specific conditions or proviso's.

5. It is not clear whether 'reporting' includes public disclosure. As above, I strongly support both reporting and public disclosure of all donations (and a ban on anonymous donations).

6. I support this proposal provided all donations are clearly coded. But a timeframe has to be applied that is both practicable for the party and meaningful for the public.

7. All my comments above relating to donations to parties apply equally to election candidates

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I believe that anonymous donations whether financial or in-kind, and whether to parties or candidates must be banned.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Whilst I commend the initiative to review our rules and thresholds, and think it is well overdue, I do not think these thresholds and rules go far enough to reduce the impact of external corporate influence over our political system.

Rules should be extended and actively enforced around social media, to ensure that people aren't able to get preferential treatment or greater visibility through deals with the social media platform. Social media poses one of the biggest risks to political campaigning, and if we are revising rules, we need to act in this domain also to ensure fairness and anticorruption. There should be profound consequences in place for breaking rules - including disallowing candidates to proceed with their campaign if they breach them.

We are at grave risk of enabling corporations to run our civic life, and in a time when we face existential crises, biodiversity loss and climate change - we cannot allow the influence of corporate money get in the way of the decisions that we must make. This, in effect, makes a mockery of our democratic processes.

As an example of this in a wider context, the COP 26 summit of Nov 2021 (and indeed all COP summits) failed to reach any truly meaningful agreements because vested interests (such as dairy farming lobbyists) were allowed to be present and weigh their influence over the proceedings. Therefore, making it impossible to ever make decisions that are necessary in the wider political landscape.

Proactive Release

Response ID ANON-VKQE-1UBP-F

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 11:05:06

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I support lowering the public disclosure threshold for donations to \$1,500 for parties and introducing requirements for parties and candidates to disclose more details about in-kind donations. \$1500 is a large financial donation which is an option for only the well off and could be a kind of lobbying. In kind donations are also a kind of lobbying I think.

I don't see how removing the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000 would improve transparency and openness.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I support these three changes, and it seems clearly to support more transparency.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I support banning anonymous donations over \$100. Politicians and citizens should be confident that parties are not being influenced.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Aotearoa is already ranked high for political transparency and openness but we can't take it for granted. There needs to be active measures to remove the risk of corruption, remove unequal access to political power in these times of growing inequality, and model how transparent governance can work for the world.

out of scope

From: s9(2)(a)
Sent: Tuesday, 25 January 2022 8:38 pm
To: electoral
Subject: Submission on proposed changes to political donation rules

To whom it may concern,

Please find below my submission on proposed changes to political donation rules (<https://consultations.justice.govt.nz/policy/political-donations/>).

I am making my submission as an individual, s9(2)(a)

Accordingly my remarks are relatively general, and address the related briefing (ELP-15-02) as much as the proposed reforms themselves.

I am broadly supportive of the proposed reforms, given the strong evidence that greater transparency regarding political donations is required. I have, however, some concerns about the reasoning behind the reforms.

In the briefing, p.2 notes the desire to act "without unduly restricting donors' ability to donate" and while preserving "parties' and candidates' ability to raise the funds they need". These are reasonable things to bear in mind, but arguably more important still is the principle of equal political influence. It is surprising that this does not receive more attention in the briefing; indeed equality seems not to be mentioned at all. If the principle of equal political influence (that citizens should have similar influence over political decision-making, in crude terms) is to be taken seriously, and donations are held to create influence, then donations could arguably be restricted very strongly (or transparency applied very stringently) without any "undue" restriction of the ability to donate. Stringent action on donations is also arguably perfectly compatible with preserving party and candidate fundraising options, given that the potential for comprehensive state funding exists, though it is of course not without problems.

The briefing also notes (p.3) that "donations have long been accepted as a legitimate form of political participation in New Zealand". This is true in a minimal sense – there has never been a major drive to eliminate donations altogether – but it is not clear that it is true in any more extensive sense. The extent to which large donations are accepted as legitimate has seldom been established. The most recent research, of which the Ministry is aware, was conducted by the Institute for Governance and Policy Studies in 2021, and shows a substantial majority (over two thirds) supports a package of reforms that would cap donations at \$10,000 and require donor identity to be disclosed for donations over \$1000. A substantial minority would support a still tougher package of a cap at \$1000 and identity disclosure for donations over \$100. It therefore appears that large donations (especially the anonymous kind) are not "accepted as a legitimate form of political participation", and this needs to inform future Ministry work.

In the briefing, p.4 argues there is a need to preserve "freedom of political expression". To what extent donations constitute "freedom of political expression" is, however, unclear. Citizens have multiple ways to express their political views, including voting and publicly stating their preferences. It is not absolutely clear that donations are necessary to protect this freedom, although arguments in that direction can of course be made. Given that wealthier citizens can make larger donations, donations appear a particularly problematic form of freedom of expression, if they are indeed such. At the very least, the Ministry should not unquestioningly

assume that donations represent an important form of the freedom of political expression.

The briefing proposes one reduction in transparency, the elimination of the requirement to rapidly disclose donations over \$30,000 (p.7). Whether this is acceptable, though, depends on the increased frequency envisaged elsewhere. Regular reporting of all donations will have to be at least quarterly, if not more frequent, for this to not constitute a serious decrease in transparency. Moreover, as the briefing acknowledges, the 10-day disclosure of large donations would have to be retained in the lead up to a general election, when voters could be left in the dark if a late surge of large donations changed parties' motives or abilities to campaign, in ways that did not become clear until after the election.

The question of anonymous donations requires careful consideration (pp.8-9). Channelling such donations (where they are over \$1500) through the Electoral Commission is designed to eliminate the potential for influence; indeed some overseas scholars have argued that donations of any size should be allowed (as they currently are in New Zealand) but they should all have to be channelled in such an anonymous manner. However, such provisions are potentially open to abuse: theoretically at least, a donor could prove to a party that they had given a particular sum by making it a number liable to stand out once channelled by the Electoral Commission (e.g. \$21,345.67) or by secretly providing their bank records to the party.

Smaller donations (under \$1500) may not raise the same issues. However, the Ministry appears overly quick to dismiss arguments for reducing the threshold for anonymous donations further, for instance to \$500 or \$1000. This implies there are no differences between donations of, say, \$50 and \$1499, no gradations of potential influence at that level. This, however, appears false. At the lowest level, donations of \$10 or \$20 might represent buying a lottery ticket or attending a fundraising quiz for a candidate. Clearly, no meaningful influence is being exerted here, the amounts given are within the reach of the vast majority of New Zealanders, and there is no valid reason for disclosure; indeed donors at that level have a legitimate expectation of privacy. A donation of \$1499, by contrast, is the kind of amount typically given by relatively wealthy businesspeople for fundraising dinners at which they are given unusual levels of access to politicians and candidates. Far fewer New Zealanders could afford to make such a donation, and the potential at least for influence is clearly far greater in the latter case than the former. It is not surprising, then, that – as above – a substantial minority of New Zealanders support identity disclosure for donations over \$100; clearly such citizens are capable of discriminating between the kinds of donations outlined above. This appears one area where significantly more work is required by the Ministry.

Finally, the briefing notes potential further areas of work, including the rules concerning what kinds of entities can donate. Since this is not immediately under consideration, it is worth noting simply that such rules are extremely important and are overdue a serious examination, especially given that in some other jurisdictions only individual residents or citizens (natural persons) are allowed to donate. Yet further rules, including those concerning caps on donation amounts, also require urgent examination, and it is to be hoped that the Independent Panel will carry out such work.

In closing, I would like to reiterate my support for the general direction of the proposed reforms, while noting that further work is needed in a number of areas.

s9(2)(a)

s9(2)(a)

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 14:18:17

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Mostly, but I disagree with No.3. I think donations over \$30,000 should be revealed within 10 days. Both the amount and the donor's name should be reported.

A large sum like this is likely to make a huge difference to a political party's finances and we should know who is financing them.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes, I agree with all of these.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

A ban on anonymous donations would be a very good step towards transparency.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

No. I want financial support to political parties to be as transparent as possible. Otherwise, we risk becoming like the US with maniacs like Trump in government. Keep NZ corruption free, please.

Response ID ANON-VKQE-1UVN-1

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-20 11:14:48

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

If you send in your support by \$1 or \$1000 or \$10000 you should have your organisation or name on the list. Don't want your name made public? Why not if that is what you believe in? Why would you not want to say it out loud, back your actions? Surely it isn't that difficult to compile and collate.

I think the proposal doesn't go far enough.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Some people therefore won't donate. Some things people will therefore have to let go

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

out of scope

From: s9(2)(a)
Sent: Monday, 17 January 2022 10:18 am
To: electoral
Subject: Electoral Reform

Dear Sir/Madam,

I wish to support the proposal to remove the ability to make anonymous donations to political parties. I believe that it is essential for a good democracy that all donations to political parties can be traced back to the donor;

Sent from [Mail](#) for Windows

Proactive Release

Response ID ANON-VKQE-1U2D-K

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:07:59

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I support the proposal to cap political party donations to \$1500 per donor. It helps address the current inequity in our system.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I support:

- Requiring political parties to identify donors for donations over \$100
- Calling for all 'in kind' donations to be shared with the public
- Stopping businesses from being able to donate

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I support banning anonymous donations and requiring political parties to identify donors for donations over \$100.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I support:

- Calling for all 'in kind' donations to be shared with the public
- Stopping businesses from being able to donate

Response ID ANON-VKQE-1U2G-P

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:09:42

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I support 1,2 and 4 but I still believe that larger donations in excess of \$20,000.00 should be disclosed to the Electoral Commission immediately. Ten days should not prove an insurmountable burden to any party.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I support 6 and 7 but do not support item 5. If a person wishes to donate up to \$,500.00, a modest amount surely, they should be able to do so without exposing themselves to keyboard warriors. This is just an invitation to make anonymous. all donations under \$1500.00. The rationale escapes me.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I have no problem with single donations under \$1,500.00 being anonymous.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

out of scope

From: s9(2)(a)
Sent: Thursday, 13 January 2022 10:08 pm
To: electoral
Subject: submission

Dear Ministry of Justice

I believe we should:

- Cap political party donations to \$1500 per donor;
- Require political parties to identify donors for donations over \$100;
- Require all 'in kind' donations to be shared with the public;
- Stop businesses from being able to donate;
- Ensure that our system of donations to political parties does not allow rich individuals, businesses or organisations to have more political influence than poor individuals, businesses or organisations.

I believe we should not remove the requirement for parties to publicly disclose, within 10 days, the amount donated, and identity of the donor, in cases where the donor has donated over \$30,000 within the previous 12 months.

Yours sincerely

s9(2)(a)

Response ID ANON-VKQE-1U2X-7

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:25:00

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Identifying the donor is the most important factor with party donations. It provides a better understanding to the public as to why parties are advocating for policies and if the policy favours the donor.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

All donors names to be reported without exception

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UXH-W

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-20 09:54:40

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

No it won't make any difference as they will work around any limits by splitting up donations to suit, as shown at the last election when National were caught doing exactly that but got away with it.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Minimally but they should be reporting ALL amounts. All funding by anyone or any entity should be reported to the public as they are trying to be in charge of the public purse so any influence from ANYONE should be made public BEFORE the upcoming election not AFTER it. Consider that all financial transactions have to have KYC information to stop money laundering from criminal activities - this should apply to political donations as well!

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UBV-N

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 10:09:10

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I believe they would with the exception of item 3. No way should donations of thirty thousand dollars be anonymous, for any amount of time. If democracy is to thrive we must lessen the influence of lobbyists and donors. I do not want elections won or lost, based on who can afford the most advertising, or marketing executives. I want policy based, long term strategies to appeal to voters. Not shiny slogans and smear campaigns. The perceived transparency and integrity of our elected officials is vital. The highest standards must be pursued. Democracy is for the general population not company greed. .

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

The more often reports and details of donations are made, in theory makes compliance easier. The cost of this is the cost of a fair democracy. I don't believe any amount of money should be anonymously donated to a political party, ever. It undermines the integrity of the individual or party receiving the money. A record of names of donors should be available to at least a private parliament body. That will maintain the donors privacy and maintain the integrity of the person or party reviewing the donation.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think the privacy of donors can be allowed if the list of their names is only viewed under secrecy. It is still in some parts of society private who you vote for. So yes I guess essentially banning anonymous donations is a good idea.
(What does a rich person buy that a poor person wouldn't think off ? A politician.) yes ban anonymous donations but allow for some privacy?

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

No organisation that does not participate in elections should be allowed to donate to any political party. For example the Brethren group funded the printing of lots of leaflets a while back but none of them even vote. Privately funded groups such as the tax payers union and the maxim institute and trade unions should not be allowed to participate in democracy unless they want to stand for election. Groups acting on the fringes of political influence just muddy the waters and grow division in society. The blatant lies need to be stopped at all levels of politics, we can't slide into the farce that is Britain and USA. Although hopefully more integrity in the funding of parties or politicians will help clean things up.

Proactive Release

Response ID ANON-VKQE-1UWC-Q

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 18:37:54

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes I believe lowering disclosure thresholds, increasing reporting frequency and increasing details around in-kind donations will improve the transparency of donations. Greater transparency will help with public trust but what will help with public trust even more would be to minimize the influence of donors on the parties and candidates they donate to. This can be better achieved by banning corporate and anonymous donations all together and limiting personal donations to an inconsequential amount.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Requiring candidates to disclose loans I believe is a good move. It should also be a requirement that they disclose the source of the loan to help minimize the risk of a candidate being under the influence of a person or corporation that puts up money for a loan.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

The most important factors to consider with regards to anonymous donations is the risk they pose in enabling those with money to use the donations avenue to curry favour with a party or politician. The donor could disclose to the recipient that the funds are from them thus setting up the quid pro quo without the justice department knowing.

I believe anonymous donations should be done away with as the above risk outweighs the benefit to the individual who might want to remain nameless.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Just that they don't go far enough.

The process is broken: those parties who represent the values of corporations and the wealthy are set to receive a greater share of total donations than the number of their followers would suggest. Election funding should come from the government and be funded by taxes and be in proportion of the parties membership.

Proactive Release

Response ID ANON-VKQE-1U3J-T

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 22:29:17

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I presume 3 is replaced by the disclosure requirement in 1, including disclosure being to the Electoral Commission, and within 10 days - that's all good. The result will certainly be an improvement in transparency and openness. Any funding of a politician personally or of a party should be completely disclosed, to ensure voters understand possible sources of bias or recognise the possibility of favourable treatment of a donor. All the proposals will increase transparency..

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5 should be extended to all donations - that is, anonymous donations should be prohibited. 6 will (need to) disclose sources of funding, including both donations and loans - but all donors should be disclosed to the level of individuals - eg, no "trust" donors or other means of aggregating donations prior to the requirement for disclosure, or hiding the true source by attributing the donation/loan to "trustees"

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I unreservedly support the banning of anonymous donations, because as stated. Placing a trigger amount on the size of reportable anonymous donations would only lead to donors devising ways to avoid disclosure. Simplicity in disclosure obligations is always desirable.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

These changes may not go as far as I would like, but they are fundamentally important to the democratic process. qv the US system.

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:54:05

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, the more we see the more we know.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes, it will make them more accountable

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Recording all donors and making their names accessible will add to transparency and fairness.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Please make everything completely transparent.

Response ID ANON-VKQE-1UTT-5

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-15 22:39:14

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

People should be free to cast votes, free of the influence of companies.

Whilst I commend the initiative to review our rules and thresholds, and think it is well overdue, I do not think these thresholds and rules go far enough to reduce the impact of external corporate influence over our political system.

Corporate influence and the effects of external funding in political campaigning is not something we have to take for granted.

Even small amounts of money - \$1500 from a private individual - can have a huge impact on a political campaign, and I should know because in 2011 I ran a national political party campaign. I know how many hoardings you can erect and how many brochures that amount can get. If those messages are 'dirty' and slanderous, slurring a candidate or party - this can create both immediate damage in the polls and long lasting reputational harm even after investigations reveal the information to be false.

Political campaigns should be publicly funded as we already do with the Broadcast allocation, with a base level allocation given to new and emerging parties. We need to be assessing based on the merit of the campaign platform, and direct contact with candidates.

Rules should be extended and actively enforced around social media, to ensure that people aren't able to get preferential treatment or greater visibility through deals with the social medial platform. Social media poses one of the biggest risks to political campaigning, and if we are revising rules, we need to act in this domain also to ensure fairness and anticorruption. There should be profound consequences in place for breaking rules - including disallowing candidates to proceed with their campaign if they breach them.

Why do I take such a resolute position on this?

We are at grave risk of enabling corporations to run our civic life, and in a time when we face existential crises, biodiversity loss and climate change - we cannot allow the influence of corporate money get in the way of the decisions that we must make.

Federated farmers give money to all the main political parties, to keep favour. Yet some of the economic moves that we need to make to reverse the damage to our rivers and lakes will impact on their profitability. We can't have them in the pocket, while we are making decisions on behalf of planet and people. Businesses do not have a right to pollute and profit. Our electoral donation laws allow them unnatural influence. Our politicians need to be free to act, unbound by a sense of allegiance to funders.

People should be able to cast votes, not companies. To remove public and private donations, and to centrally fund - through the tax payer - is the only way we ensure the freedom of our vote. This is as significant to our democracy as giving women the vote was, and we should use the opportunity of this review to carefully examine the influence of external money in politics and whether it should be our future. The answer is clear to me.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I agree with increased reporting, and transparency.

There needs to be easy mechanisms and additional resource/processes offered to support the candidates and parties to comply - as the administrative overheads on the reporting will be significant for candidates and smaller parties.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I STRONGLY agree with a ban on anonymous donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1U5B-M

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:41:56

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1: lowering the public disclosure threshold to \$1500 just makes sense. It's so obvious I have nothing to say except that I sincerely support this being passed into law. So the old \$30K rule is now redundant and should be removed (3).

2: reporting more often increases transparency and I support this.

3. yes, in-kind donations should be disclosed, it needs to be clear who is benefiting, how much, and in what way.

I do think you should consider capping the amount of any donation, whether anonymous or not. Action Station suggest a \$1500 cap but this seems ambitious to me. Some people will want to give more, but maybe cap it at \$10K? That still allows people to feel generous, but there's more restraint.

I also think that political parties should be required to identify donors who give more than \$300.

Most importantly, I think that businesses should NOT be able to donate at all.

Businesses do not vote in elections. People do.

People can donate to support the party of their choice.

Businesses inevitably include and involve and represent people who hold many different political standpoints. A donation by the organisation does not represent them, and the organisation may have much larger resources available for donations than any of the people it employs.

I realise this is a big ask but I think it is very important.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I am not familiar with the existing reporting systems, and also not familiar with the current burden of compliance, so it's hard to comment on this. However, here are my uneducated thoughts.

5: This would add to transparency, and could potentially prevent multiple smaller donations by one individual, or depending on how it's set up, a group or

organisation.

6: Do you mean the financial statements of the political parties, the candidates, or both? The question isn't clear. Could be useful, but how do you balance this with privacy?

7: Yes, if candidates are taking loans, this should be visible.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Again I'm pretty ignorant of the factors at play here. So just thoughts.

With regard to large anonymous donations, I wonder how anonymous they really are? Perhaps information is shared about donations outside of the donation transaction per se.

The value of each anonymous donation still needs to be reported, it's part of the total picture.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Thanks for what you're doing to make our democracy more equitable and transparent. Please have the courage to make changes that will really make a difference.

Proactive Release

Response ID ANON-VKQE-1UZP-7

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 12:44:19

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes. Large donations incentivize politicians to protect the interests of the donor. Voters have the right to know the interests that are being protected by their candidates, and the parties and organizations that are making those donations in pursuit of their own interests.

Specifically, proposed changes 1, 2 and 4 would increase the amount of information available to media and the public, so that we can make more informed choices about our candidates.

The proposed change to remove the obligation of parties to disclose the identity of their donor within 10 days, seems counter productive. As the obvious solution to these changes, for those who wish to hide their donations, is to provide a steady stream of smaller donations that are not required to be reported on, totaling a greater value than \$30,000.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes. Requiring parties and candidates to disclose their financial statements and loans they have taken gives us better opportunities to track their income from donations, and reference that against the disclosed donations to determine how deeply invested they are in the interests of any one party. For instance, an organization that makes up less than 5% of the party's donations has far less influence than one that makes up 20%.

Requiring all significant non-anonymous donations to be actively reported also allows us to better track that income. However, I believe more needs to be done. The concept of anonymous donations, in regards to political organizations that are expected to protect the interests of their people, is ridiculous. Transparency and open communication should be government's number one priority. There should be absolutely no allowance for deception or misinformation.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

As I previously stated, there can be absolutely no room in Government for deception or misinformation.

If a political party is receiving a large enough sum of money, from an organization OR a collection of individuals, that they may experience a conflict of interest between that party and the country they claim to serve, then every voter must be made perfectly aware of that fact. Media must be given the tools to report clearly on the income of each political party and representative, and to clearly outline where their interests lie.

If someone has access to enough capital that they're capable of manipulating the interests of an entire political party, and the desire to contribute such a large amount, I would assume that they have enough capital that their anonymity or protection are of the lowest priority. They have the resources needed to protect themselves and their own interests already.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1U2Y-8

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 14:12:16

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Ensuring more transparency in our political systems, and stopping the wealthy New Zealanders having more influence over political parties.

This relates to point 1. Capping political party donations to \$1500 per donor and stopping businesses from being able to donate, and requiring political parties to identify donors for donations over \$100. This would also increase frequency of reporting as commented in point 2.

Harsher penalties for parties that do break the rules (this is their jobs they ALL do know the rules) and keeping the 10 working day period to report Donor details, point 3.

This relates to point 4. Calling for all 'in kind' donations to be shared with the public, including donors details.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

The same disclosure rules for investigation should stand as the AML rules but with the lowering of the threshold to \$1500.00 for transparency. Commenting on all.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

You cannot make any anonymous cash transfers under the new AML rules therefore this could be another way of laundering money and obtaining political influence which is unacceptable, one rule for all NZers.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

out of scope

From: s9(2)(a)
Sent: Friday, 21 January 2022 9:04 am
To: electoral
Subject: Restricting Anonymous donations to political parties

I respectfully submit the following to the Justice Review on political donations:

1. That a transparent political system must restrict donations to any party to no more than \$1500.
2. That only individual voters (not business or commercial groups) can give donations.
3. That all donors be identified for any donations of \$250 or more.
4. That 'in kind' donations must be quantified and declared to the public.
5. That legal entities established for the purpose of collating sums of money and on lending this money to a political party such monies shall also be caught by these regulations..

s9(2)(a)

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Response ID ANON-VKQE-1U68-B

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 16:57:27

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes they all would improve openness and transparency, so that people can't make donations for services.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

No donations should be anonymous, they should all be registered, even if not publicly reported.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

The changes should go further with requirements for the donors to be on the electoral roll. This would excluded trusts, businesses and foreign donations, and show that it's voters who are being represented

Response ID ANON-VKQE-1U5X-A

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:46:33

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes

All of the proposed changes are desirable in order to promote open democracy and decrease the power and influence of large wealthy donors.

Disclosure - more frequent and inclusive of in-kind donations is to be commended.

The current system allows for large donations to be broken into several 'invisible' transactions and such anonymity is dangerous in a healthy fair electoral environment. Further it is a deliberate avoidance of discovery of important information.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

All of these proposals are important.

Currently the only way of finding this information is through candidate returns - post the elections and often the data is patchy and inadequate.

Where the candidate represents a party then both the candidate, and the local party organisation need to provide the information and make it available to local party members as well.

Political parties must not conceal their role and hand responsibility to the candidate.

Only truly 'independent' candidates can be held fully responsible for the returns made in their names.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Transparency

Open society

Undue and unfair influence of those with wealth

Exacerbation of wealth divide

Secrecy trumping the public's right to know who the backers are

Diminution of the rights and access of those unable to donate

The ability/capacity to donate rests on the notion of one having excess money after living expenses and financial responsibilities

Why should those already cushioned against poverty and adversity add to their privileges of having someone /some party beholden to them?

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Please proceed to make these changes as they will strengthen our democracy

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 20:15:17

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, I think that all four proposed changes will improve transparency and openness, however, I think they are a drop in the bucket of what is required to guarantee public trust in the electoral system.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes, these are fine.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

If I understand correctly, donors can no longer stay anonymous if their donation is over the threshold of disclosure? If so than that is great.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I think these changes do not go far enough to protect the integrity of the NZ electoral system.

The fact there is no upper limit to our donations (provided they are disclosed), is very concerning to me and indicates an oligarchy, rather than participatory democracy.

As indicated by Simon Chapple and Thomas Anderson in their paper on donations, 'Who's donating? To whom? Why? Patterns of party political donations in New Zealand under MMP', business and rich individuals are donating large sums "trying to buy the ear of government".

Wealth inequality is an incredibly important consideration for the integrity of a free democracy in NZ. Looking at political donations from 2021, several

individuals and organisations have donated six figure sums to our political parties. When the minimum wage, full-time employee can earn around \$40,000 per annum - having no limit on political donations makes a mockery of equal and fair elections.

Our democracy will improve by reducing the maximum political donation amount. Reducing the maximum donation amount to, say, \$50 maximum per annum per donor will create a politically level playing field where donations can no longer unduly influence political candidates and political parties. In fact, to get more money, candidates and parties are incentivised to create attractive policies and effectively communicate these via word of mouth and public discourse.

As a side benefit, reporting on donations can be made simpler.

We have implemented a similar policy against foreign donations, so the Government has already acknowledged the threat that money influencing politics brings. The next step is to realise that a) it is not hard to funnel money to appear as legitimately coming from a NZ origin (if there's a will there's a way), b) money in politics is inherently corruptive, c) there is a wealth inequality in NZ - meaning some people have a greater political say than others (under the current rules).

Thank you for your consideration.

Proactive Release

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 16:58:57

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Instead of the proposed rules, I would like to suggest these:

- Capping political party donations to \$1500 per donor;
- Requiring political parties to identify donors for donations over \$100;
- All 'in kind' donations should be disclosed to the public.
- donations from businesses, trusts and other corporate forms should be disclosed to the public.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations of small amounts (less than \$100) are reasonable in my opinion.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 13:29:47

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I agree with all four recommended changes: all four would help to improve the transparency of our democracy.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I agree with all three proposed changes as means of strengthening our democratic system.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations should be banned as a means of making election funding more transparent.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

It's important that NZ is pursuing these proposed reforms given the need to demonstrate internationally that we recognise the need to continue to strengthen our democracy.

Response ID ANON-VKQE-1UWN-2

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 09:42:28

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes I agree with the change but I would suggest you bring the public disclosure threshold down to \$1000. I believe anything over that should be disclosed. I believe people should know who is donating as this increases transparency. I also believe there should be a cap on donations from business of \$10,000. Business shouldn't be able to overtly influence political decisions or bankroll a parties campaign.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I can't see the point in 5. introducing reporting for donations under \$1500. I worry about introducing too much compliance for small parties who shouldn't be disadvantaged. I am happy with everyone over \$1000 requiring reporting but anything less is over the top as long as it's not \$1000/day donations that add up to a lot of money. There should be a cap on the total number of donations to \$10,000 over one year period.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Transparency. Avoiding anonymous corporate donations and big companies 'buying' policies or parties. Making it easier for grassroots campaigns by smaller parties who are already at a huge financial disadvantage.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 09:34:59

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Ban all corporate donations
2. Ban anonymous donations over \$100
3. Cap the amount an individual donor can donate

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 15:00:58

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Lowering the thresholds for political parties to disclose the identity of donors from \$15,000 to \$1,500 (to align with the disclosure threshold for donations to candidates)

I strongly support this proposal as it will significantly improve transparency and openness in political donations.

The disclosure threshold was increased from \$10,000 to \$15,000 in the review of the Electoral Act following the 2008 election. In my opinion this was a move in the wrong direction, as it made it easier for donors to bundle a significant total donation from related entities.

A full and independent review of the whole electoral legislation is due for attention in 2022 with a report in 2023 for the 2026 election. The last time such a review was undertaken was the 1986 Royal Commission on the Electoral System which recommended state funding of political parties along with the MMP system. The latter proposal was adopted by referendum and forms the basis of the 1993 Electoral Act.

Prior to 1993 the law only covered candidate donations and there was opportunity for considerable abuse. In my opinion the other shoe needs to drop from the 1986 Review, as it comprehensively covered all the issues and the present system is a Topsy-grown minefield. However state funding is outside the purview of this exercise and is to be considered in the more substantial review.

However this restriction to \$1500 will likely limit the funds available to political parties for their principal activities of policy development and election campaigning. For the purposes of the present review, it may be appropriate to consider a one-off increase in the current broadcasting allocation for the 2022 election with the Electoral Commission able to determine rules for fairness among the parties and any new entrants.

2. Increasing the frequency of reporting of donations by parties

In my opinion this should apply particularly in the three-month period up till the election as it is important that any significant donations are disclosed before the election and not afterwards.

3. Removing the requirement that the identity of donors making donations over \$30,000 must be reported to the Electoral Commission within 10 days (alongside proposal 2)

This proposal addressed recency and size of donations before an election although the ten-day window still allows for last-minute non-disclosure. If the above proposal of regular disclosure say each month and a final at the beginning and end of the voting period this would make the requirement unnecessary.

4. Requiring more detailed disclosures of in-kind (non-cash) donations

This presumably refers to the practice of auctioning donations such as art works and other memorabilia. s9(2)(a)

that donations such as art works would be declared as from the artist, which was indeed the case. If they were sold, the value of the artist's work should be assessed at a fair market rate, and any other donation from the purchaser would only apply if it sold above that rate. The only other information that might be useful would be prior professional valuation of the work's market value, as I understand is now

the practice.

5. Requiring disclosure of the volume and total dollar amount of donations under \$1,500

I am not sure that this is necessary or useful in the days of on-line fundraising.

6. Requiring parties to release their annual financial statements, and simplifying the audit requirements to make audit reviews more meaningful

I absolutely agree with this and think it is essential.

7. Introducing a requirement for candidates to disclose loans.

Definitely support this.

A ban on anonymous donations is also being considered. If introduced, such a ban would impact on a number of parts of the Electoral Act.

It would be worth knowing what is the size of the problem – how many people make anonymous donations that comply with the threshold limit, and how many donations are made under the protected disclosure regime. I don't recall receiving many such donations. The current provision is certainly cumbersome.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Re 5

This would depend on the minimum level of such donations. Having to calculate how many separate small donations were made in much candidate and party fundraising would be onerous and in my opinion unnecessary.

Re 6

This will assist compliance as it involves clear rules and procedures

Re 7

Will assist compliance as again there will be clear rules

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

A ban on anonymous donations is also being considered. If introduced, such a ban would impact on a number of parts of the Electoral Act.

It would be worth knowing what is the size of the problem – how many people make anonymous donations that comply with the threshold limit, currently set at \$1500? This is the same as the disclosure limit, so effectively all donations under \$1500 are undisclosed to the public.

Also how many donations are made under the protected disclosure regime. I don't recall receiving many such donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UUS-5

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 15:51:19

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Small anonymous donations should be allowed, perhaps not more than \$1,000(?).

Anonymous donations imply to us that they are not telling us because we would make assumptions, like favours given for votes.

It is very hard to determine if that is happening now, but outcomes would seem to indicate so - eg ability to dodge income tax on income from trading property, especially when that activity is causing harm to our society.

Right now only the already rich are able to afford to buy their own house to live in, and others are required to rent at costs increasing far more than their incomes, so the rich get richer and the poor get poorer and more numerous. Not good for general happiness.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Yes.

I believe election funding should come from central government, probably based on the number of members of each party.

There should also be a limit of the amount of spending.

Money buying votes is not good for our society, including money paying for mass persuasion.

Proactive Release

Response ID ANON-VKQE-1UV7-A

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-17 15:21:12

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

All of these measures sound good except that I don't understand why large donations over \$30,000 should not be reported to the Electoral Commission.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

All of these measures sound good.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think there should be a ban on anonymous donations. I don't see that there's any grounds for privacy when it comes to influencing the political process. And we've seen too often that the parties "anonymous" donations are often actually well known to those receiving the donations, anonymity is too easily abused.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-23 22:12:46

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I think these disclosure rules and thresholds (1,2 and 4) would improve transparency and openness, because more donations/donors would be publicly identifiable. The effect of proposal 3 would seem to be obviated in part by the introduction of proposals 1 and 2. I would like to know more about proposal 4 because I imagine these kinds of donations could be very influential/significant.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I think 5. would support compliance, because then such donations would be traceable and influence/money could be identified. I do not have experience to give feedback on if 6. or 7. would support compliance.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I feel it is very important to know who is influencing our national decision makers. I do not know what the impacts on reporting/compliance are likely to be, but the existence of anonymous donors to politicians or political parties makes me concerned that they are operating not as servants of their constituencies but of whoever is paying them.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UWS-7

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 08:06:10

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Very little as they don't go far enough

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

No as they don't go far enough

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

No as they don't go far enough

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Ban all corporate donations

Ban anonymous donations over \$100

Cap the amount an individual donor can donate

Response ID ANON-VKQE-1U3M-W

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 21:46:02

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Proposals 1, 2 and 4 would increase transparency and openness.

I'm confused by Proposal 3 though. What would happen for example if an individual or organization donated a large sum of money to a political party during an election campaign? Could the removal of the requirement to disclose to the Electoral Commission within 10 days mean that the donation was essentially anonymous until after the election? That wouldn't be transparent.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

These all sound sensible

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Individual privacy (for example my employer or landlord or prospective employer or prospective landlord should not be able to look up on a register and identify that I made a small donation to a specific political party, eg that I donated \$20 to the Greens)

Making it so that donations can be anonymous if under \$1500 would be sensible, that is a low enough cap

The reporting should group multiple donations made by the same individual / organization to the same party so that people / organizations cannot split a large donation into small amounts that are under the cap

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1U6N-1

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 21:21:14

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes except for item 3, seems sensible for candidates or parties to report donations of that size quickly. I would even support reporting donations in excess of 2500 in a 12 month period.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes. More reporting can only help to prevent or expose corruption or quid pro quo's

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Democracy is under threat around the globe, one way we can strengthen ours is to remove anonymous donations to our politicians

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UZK-2

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 11:04:13

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I support a ban on anonymous donations above \$100 and a cap on the amount any one individual can donate to a political party or candidate.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I support a ban on anonymous donations above \$100 and a cap on the amount any one individual can donate to a political party or candidate.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I support a ban on anonymous donations above \$100 and a cap on the amount any one individual can donate to a political party or candidate.

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-21 22:33:21

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Yes,they should be banned

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:42:22

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Transparency and openness must be improved if disclosure is required for significant donations and \$1500 seems a reasonable threshold. In-kind donations should have the same threshold as financial donations as they have the same impact on the party's finances.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

6. Financial statements of political parties should be publicly disclosed for full transparency. This would help support compliance. They should include clarity on candidate loans.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

The total donation amount from any anonymous donation should be reported in a list of anonymous donations along with the date of donation? There should be a low threshold on anonymous donations of around \$100 so they don't mask major donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Changes should be designed to minimise advantage to major parties over minor parties.

out of scope

From: s9(2)(a)
Sent: Monday, 17 January 2022 11:25 am
To: electoral
Subject: Ministry of Justice:Proposed changes to political donation rules in our electoral law

To:Ministry of Justice
Submission Re: Proposed changes to political donation rules in our electoral law
From: s9(2)(a)
Closes: 25 Jan 2022

I am submitting my opinions regarding the questions posed.

It is to be hoped that the proposed changes to disclosure rules and thresholds would improve transparency and openness and therefore I support them.

I think that the public has a right to know who is supporting a political party and parties must be required to identify donors.and share all "in kind" donations with the public. The wages of the PM and MP's in Parliament are payed from the public purse.

It is only fair that a cap should be placed on all donations to political parties e.g \$1500 per donor. This cap must include donations from businesses, otherwise it indicates that a.quid pro quo is being sought from government: i.e support for their trading practices whether or not they are in the interests of the common good.

Do I think the proposed changes to reporting would help support compliance? I think the proposed changes have to be adopted and it's a wait and see situation as to whether more compliance will be achieved.

Thank you.

s9(2)(a)

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 11:53:24

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

N/A

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes they should. Why, I don't trust any politician, they often speak with forked tongue.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

No! they should be tougher, I don't trust any politician.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Donald Trump springs to mind. He was a lying sub-human.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1U33-3

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 18:16:18

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I believe this would improve transparency as we'd have greater visibility of where political parties we're getting their money.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I believe that a \$1500 limit on anonymous donations is appropriate. I believe people should be able to donate anonymously, for the same reason I think people should be allowed to vote anonymously.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

No political party is going to be swayed by a single \$1500 donation, but plenty have been influenced by \$30,000 donations, so I think changing this threshold is sensible. Anonymous donations should be allowed if you just want to support a party and their current policies, but if you're donating enough to influence them, I'm interested in who you are.

Response ID ANON-VKQE-1U6E-R

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 18:29:44

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I'm not sure about #3: Removing the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000. I feel like it may be at odds with what is being done here but otherwise all good

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I dont think anonymous donations should be allowed. I do think that making them available for the general public is wise either as it would appear certain factions are trying to stoke the partisan "Us vs Them" bullshit they do in the states (Thank god for MMP)

I just don't really know about this one, on one hand knowing who is sponsoring politics like it is a formula 1 race would be good so we, the public know who is influencing those in charge but on the other hand if the "us vs them" rhetoric becomes stronger in NZ I can absolutely see the information being used in unsavory ways.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1U3S-3

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 17:54:28

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Lowering public disclosure threshold for donations to \$1,500 for parties

YES. This is crucial for any genuine democracy. I understand that currently larger donations can remain anonymous. That is unacceptable.

3. Removing the requirement to disclose to the Electoral Commission, within 10 days, the identity of donor and amount for donations that exceed \$30,000

NO! All donations over \$1500 should be reported to the Electoral Commission within 30 days.

4. Introducing requirements for parties and candidates to disclose more details about in-kind donations.

NO in-kind donations of any sort. If you DO choose to allow these donations, then the details and money equivalent MUST be released to the Electoral Commission within 30 days.

Businesses or Trusts must NOT be allowed to make donations of any type. Businesses are not voters; in a genuine democracy they must have ZERO right to any influence on politics. When we are facing urgent existential crises such as climate disruption, allowing commercial pressure, via donations or indeed via any sort of influence, on party policies or on government decision making is a despicable betrayal of our young people's future.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

5. Introducing reporting requirements for non-anonymous donations under \$1,500

YES - please do.

6. Introducing a requirement to publicly disclose financial statements

CERTAINLY YES.

7. Introducing a requirement to publicly report on candidate loans.

CERTAINLY YES.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

There should simply be NO anonymous donations of any size. Not even \$2.00
Anonymous donors, surely, have suspect and potentially anti-democratic motives.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

After many decades of GDP growth, nations now face unprecedented challenges as we increasingly run up against the implacable laws of physics, and the limitations of Earth's resources. Trust in government and in parliament is increasingly under threat; hence societal division and therefore the chances of a breakdown in democracy are increasing.

We simply MUST NOT allow wealthy individuals and/or commercial interests to have undue influence on the political process.

<https://phys.org/news/2021-11-nations-overusing-natural-resources-faster.html>

<https://www.independent.co.uk/climate-change/mit-1972-prediction-societal-collapse-b1884673.html>

<https://www.msn.com/en-gb/entertainment/news/society-is-right-on-track-for-a-global-collapse-new-study-of-infamous-1970s-report-finds/ar-AAMk2Hs>

<https://phys.org/news/2020-02-multiple-eco-crises-trigger-collapse-scientists.html>

<https://royalsociety.org/topics-policy/projects/people-planet/report/>

<https://www.overshootday.org/>

<http://science.sciencemag.org/content/362/6420/1242>

<https://www.ippr.org/research/publications/age-of-environmental-breakdown>

<https://www.newstatesman.com/politics/staggers/2019/02/it-s-no-longer-climate-change-we-re-living-through-it-s-environmental>

<https://phys.org/news/2020-01-blue-colossal-human-pressure-ocean.html>

Proactive Release

Response ID ANON-VKQE-1UVD-Q

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-17 09:46:18

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, I think the amount donated per donor should be disclosed above \$1,500 (or even less). In fact, I think it's faintly ridiculous that individuals and organisations can use their bank accounts as leverage to promote political parties. It gives off the signal that having money is more important than "one person one vote" in our democracy. I think in an ideal world (which I appreciate we do not live in) I would say that political party campaigns should be run entirely off the taxpayer dollar, as I would feel proud to have my tax dollar used to ensure that our democracy is as fair, clean and corruption-free as possible. So certainly, I'd say that transparency is key so that the public can at least see if any shady lobbying is occurring. Donation reporting and party disclosure is essential to increase transparency, and stricter rules around this are necessary to uphold the integrity of our democracy. \$1,500 is a lot of money to the average person, and so donations above this amount will almost exclusively be coming from the wealthy, who likely have their own financial interests at stake when choosing political parties to donate to. This skews democratic behaviour towards fixing business issues rather than social and economic issues that are pressing concerns to other parts of society. Transparency allows people to understand if a party is being pressured towards fixing business rather than broader social and economic issues (or is more-or-less being bribed) and vote accordingly.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Also important for transparency, in the same ways described previously.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Again, important for the same reasons described previously.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UWV-A

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 11:59:55

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I feel that all politicians are answerable to us and they need to be fully transparent with everything they do and in a manner that the lay person can understand. therefore all of the suggestions above should be put into place. No double dipping, no inside trading, no bribery for decision making of corporations or other businesses we own them they work for us it is not the other way around. How did Cindy (Ardern) amass 21 million dollars in her earnings for the last two terms? that seems to be some corruption payments to start with. Maybe Fauci paid her off to sell 90% of the vaccinations to us come hell or high water, that now seems a stupid thing to do anyway. What about all the other PM's that have sneakily acted in their own interests and not for the people of Aotearoa. Look at Collins and Bridges, let alone other MP's they are all in this for themselves not for the people that thought they were the best choice - shame on them for thinking they are entitled to more - they are Kiwis and that is all. They should also be earning less than \$100K/annum, so that the ones that want to make a real difference are not persuaded by the higher salary, they are there to do a job for the people!! Dont trust a politician!!

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I think they need to have an arbitrator in the place so that they cant weasel out any finance that we dont understand. Grant seems to be putting on weight every time i see him, so that must mean he is earning more than those on bare minimum wages. So loads of money changing hands somewhere that we need to be more aware of. No "Eyes wide Shut" they need to be fully open to halt any of this masking of finances that we do not understand. just juggling figures for the books - is that cooking the books? Next they will all want to be on the new years honours list - why - they are doing their job, i hope!!

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

NO ANONYMOUS DONATIONS AT ALL - PERIOD. everything needs to be transparent and above the line. Lets have independent accountants watching over their shoulder, no matter which party is in power they all seem to be the same once they hit that office!

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

We need to have a third party to keep the Govt honest and listening to those that voted with their feet and pen, not the big pharma and corporations that want control of everything. What about all this debt we now have that our younger generations will be paying for the rest of their lives??? I also think big corporations and large organisations should also be paying their dutiful amount of taxes, so that the middle income earners are not holding the country up financially. Tax is a burden, but necessary for everyone including the highest earners - if we all paid, then life would be different for the future generations. I dont think our politicians probably sleep straight in bed anyway, looking for the deal of the century for themselves. I think the same with many of our all as one people Maori groups, organisations, community networks seem happy to waste our middle income earners tax dollars on so called community projects or affordable housing, which the ones that need that support will not be able to afford!. They also need to be accountable for every cent they use of the tax money or maybe they should be using the money the govt has given them a little wiser for all New Zealanders as we did not make decisions for our forefathers signing the treaty, we may have all thought everything should be shared out, not take everything give nothing! At the time of signing the treaty, the Queen didnt even know there was a signing of a treaty, because she was too busy attending her wedding on that day - so maybe we should sign a new treaty that is fairer to all New Zealanders. At the moment there is a them and us situation and i often wonder why that is when we are all custodians to this country, as we are all New Zealanders, not just Maori, Pacifica - Kiwis. Shame on those that are tearing this country apart.

Proactive Release

Response ID ANON-VKQE-1U6P-3

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-24 16:15:27

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

No the changes don't go far enough, only registered voters should be able to make donations to political parties, I've seen instances where a number of related trusts have made donations under the reporting thresholds so no disclosures are required. Only allowing registered voters to make donations would eliminate this gaming of the rules

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

No anonymous donations should be allowed.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

No anonymous donations should be allowed to keep elections transparent.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Only registered voters should be allowed to make donations to political parties.

Response ID ANON-VKQE-1U2M-V

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 14:33:30

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes all donations over \$1500 should be disclosed this should be done on a regular basis at least monthly. All I kind contributions should be included on the same basis as such contributions are considered as income under tax law. The commission needs greater authority to enforce compliance

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I agree on all these changes

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Why are they anonymous if not to hide the source for political reasons. All anonymous donations should be banned

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-18 17:28:37

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Proposal 1 and 4: Yes, it will improve transparency because the public will know more about the people who donate and the parties that accept those donations and can weigh if the donors match the values the party spouses. It can help in making a more informed decision as to which party to support.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Proposal 6 and 7: I believe any requirement to publicly disclose would help in making the information more readily available and give a change to analyse it and ask the part questions about it.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Add a limit to political donations. No one should be donating more than the median yearly salary.

Response ID ANON-VKQE-1UB8-Q

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-14 11:28:13

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I agree that these proposed changes to disclosure rules and thresholds are important to improve transparency and avoid inequity in influencing political parties and candidates by wealthy / corporate sponsors without public acknowledgement. ALL FOUR points are critically important to enact to ensure Aotearoa improves our democratic ideals, as well as help to ensure transparency with finances and avoiding corruption and fraud.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I agree that ALL THREE proposed changes to reporting are important to enact to improve compliance and transparency, giving the public more robust confidence in the political process and hence better for governance overall

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I absolutely agree that anonymous donations should be completely disallowed. Full disclosure of pecuniary interests in any candidate or political party's financial backers should be publicly available for comment and review.

For a robust example of what happens when anonymous donors are legally allowed to contribute to politicians' campaigns, see the United States of America - formerly the arguable world standard in democratic implementation, and now an eviscerated shell of corruption, gridlock, jingoism and stalemate.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1U2N-W

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 15:05:37

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

1. Yes, as it stands people with money have an undue influence on decision makers. It would be best to cap donations at \$1500 per donor. This would level the playing field and increase democracy.
2. Yes, this would give the public a chance to see immediately who is trying to influence decision making with money.
3. Donations over \$1500 should not be allowed.
4. In kind donations should be fully disclosed.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I would support all of the above proposals.
5., 6., 7. All of these would add to transparency.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

No one should be able to hide behind anonymity. We need to know who is trying to influence decision making.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I commend this effort to improve our laws and enhance democracy.

Response ID ANON-VKQE-1UWJ-X

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-23 19:10:55

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

No. Too trivial to have a number of donations under the cap. The cap should be something like \$50 and the identity of the donor should be identified even at that lower level. If multiple donations such as an AP is undertaken then it should be easy to replicate the donation information. It should be easy to see the summation of a donation stream from an individual. Donations should not be accepted by trusts or other vehicles designed to obfuscate the source of funds. Donations should only come from natural persons who actually live in NZ.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

No donation should be anonymous. The cap should be something like \$50. Public reporting is a good thing and it would be good if it was live not after the event (election) and certainly before the voting period commences. Perhaps donations inside the voting period should be banned.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Donations should only be allowed by natural persons and should never be anonymous.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UA2-G

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 08:00:40

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I agree with Part 1. The level of the donation implies that the donor will expect some kind of consideration.

Part 3 should be removed. It is disingenuous. There is no reason to change the time frame for reporting. A party should be well enough organised to report back. Any discussions about accepting the donation would be had before acceptance and the disclosure should be a matter of procedure. Best to keep a firm reign on this process rather than let it drag on.

Part 4 I thoroughly agree with. Kind favours and entertainment are insidious and costing up to politicians is to be frowned on.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I agree with changes 5 - 7

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

An anonymous donor can wield a lot of power over a politician or organisation.

Anonymity can cause a great distrust in the electorate and it is usually easy to see who is getting his or her own way.

Why would a donor want to be anonymous if it is not to curry favours?

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

I think the process is timely. Most of the proposed changes are long overdue.

Proactive Release

Response ID ANON-VKQE-1UTU-6

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-15 10:42:53

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I would like to see disclosure rules and thresholds to go further:

- Political party donations capped at \$1500 per donor. I do NOT support #3 above.
- Donations of over \$100 to political parties to be publicly identified
- In-kind donations to be shared publicly
- Businesses should not be able to donate

I support #2 above.

My concern is that people on lower incomes feel disempowered and so do not put energy into the democratic process - 'why bother, we can't fight those with the money'.

This is not what democracy is about! People should be encouraged to take part, regardless of financial status.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I support these measures, however I am aware that people are always able to get around 'rules' and 'laws' when they want to. The real shame is that we rely on 'rules' and 'laws' instead of honesty and integrity which comes from the heart, and not from greed (for money or power). This is where the real change has to happen.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I support a ban on anonymous donations.

I do not understand why people are afraid of being transparent. The fear is the issue, not transparency.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Proactive Release

Response ID ANON-VKQE-1UAR-G

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-21 10:31:31

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I wish to support changes 1,2 and 4.

Change 3 is a backward step which I do not support as all large donations should be public knowledge as soon as possible so voters can determine if our political parties are being influenced (bought) by wealthy individuals or organizations .

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I do agree with these proposed changes as for elections to be free and fair there must be transparency to enable voters to determine who is attempting to influence political parties/politicians

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

A ban on anonymous donations would reduce the risk of undue influence on political parties/politicians

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Increasing disparities in wealth provide opportunities for the wealthy to influence/buy political favours for there own benefit rather than our whole society.

If we are not to follow down the path leading to a political system as in the United States of America, a transparent system and reduced ability to influence the political system by those who have resources not available to ordinary citizens are important.

out of scope

From: s9(2)(a)
Sent: Tuesday, 25 January 2022 5:21 pm
To: electoral
Subject: Political.donations

I do not feel that there should be any anonymous donations to any political parties or politicians. This is not democratic, large companies should not have a collective monetary voice. Our democratic societies are becoming something undemocratic, with large companies, wealth and religion all playing a part, we need more transparency and fairness across the board.

Regards

s9(2)(a)


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out of scope

From: s9(2)(a)
Sent: Friday, 14 January 2022 9:36 pm
To: electoral
Subject: Proposed changes to political donations feedback

Kia ora,

In regards to political donations I agree that transparency should be of ultimate importance, and the amount lowered or anonymous donations banned completely. If a person or company is donating to a party it should  be transparent they are doing so.

I also think that individuals, organizations and companies should have a maximum they are allowed to donate. It is unfair if lobbying groups or particular wealthy interest groups get their issues highlighted more than the needs of every day NZer issues and it creates an imbalance of representation if wealthy groups can create well funded parties for better representation while disenfranchised groups cannot do the same.

Transparency is also not great when groups like Celebration Church can funnel large donations to political parties like New Conservatives ie: NewCons 2019 donations PDF states they got \$17250 from PTL Property Trust which takes a bit of digging to find the connection but is identified here:

<https://i.stuff.co.nz/national/99560164/celebration-centre-church-needs-more-openness-exmembers-say>

It should be clear who is funding which parties without having to do time consuming research. I am concerned as to why a church can donate such a big amount to a political party, as having been a member of a few churches myself in the past there is often an understanding that tithes go towards running the church itself, and associated charities. If church mbers felt moved to donate to a party that would be a different situation, but a church making large donations from a subsidiary trust with a different name is super suspicious.

I do also believe that National being bankrolled by large donations contributes to the divisive and increasingly bi-partisan system we are seeing, and that smaller parties are not getting their fair representation. I don't believe MMP can function to its fullest potential when we have huge slants to the system like this.

I do think that donations are a big part of it but that there need to be a number of reforms working together including:

Lowering the MMP threshold

Banning anonymous donations

Putting a limit on donations from one source (individual, and businesses under that person's directorship etc)

And some kind of clarity around the use of donations from trusts so they are not implemented as a smokescreen.

Many thanks for your time,

s9(2)(a)

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 12:29:54

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

- 1 Identity should be given for all donations over \$100
2. agree
- 3 All donors over \$100 should be identified and total from one donor should be capped at \$1,000
4. Agree

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

- 5 agree
- 6 agree
- 7 agree

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Yes agree that there should be a total ban on anonymous donations

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UT1-2

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-15 14:02:40

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes, however I don't understand how point 3 functions in this context. Surely requiring donor info for amounts over 30k would improve transparency so why alter the requirements at all?

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes, I think all of the above proposals are excellent

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I think a full ban is appropriate and necessary to prevent wealthy individuals from funding parties that align with their own interests without risking their reputation, as well as cutting down on cronyism

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

out of scope

From: s9(2)(a)
Sent: Thursday, 13 January 2022 2:09 pm
To: electoral
Subject: Political donation rules

I,d like to see

- Capping political party donations to \$1500 per donor
- Requiring political parties to identify donors for donations over \$100
- Calling for all 'in kind' donations to be shared with the public
- Stopping businesses from being able to donate

Regards

s9(2)(a)

Proactive Release

Response ID ANON-VKQE-1UZU-C

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 09:07:39

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

In general yes, but they don't go anywhere near far enough - we need to remove the need for political parties to seek campaign funding entirely and provide government funding for this (see more in later section). The proposed change to remove the requirement for parties to publicly disclose within 10 days the amount donated, if the donor has donated over \$30,000 within the previous 12 months appears to be a major step backwards.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

I totally support this. It will go a long way to vested interests making major donations by hiding them as anonymous minor donations.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

It is in the best interests of the country if political decisions are evidence based. This means that the subject matter experts should be the voices that are listened to, not those with money who want outcomes that benefit their business.

One of the great things about living in New Zealand is the relatively low level of corruption in most sectors of society. And yet we have a system that encourages corruption at the highest level. When political parties are dependent on public funding for their campaigning, then it is difficult to avoid a desire to keep these contributors happy by developing legislation that they support. Otherwise they are unlikely to continue funding the next campaign. This system puts political parties in a position that could easily be avoided, if there were limits of say \$500 per individual, no business donations and no donations from trusts, where the identity of the individuals doing the funding cannot be established.

I understand that New Zealand also has one of the most lax level of controls on paid lobbyists having access to politicians. These lobbyists are constantly pushing their clients' interests. This coupled with the party funding issues is a recipe for political decision making that is not in the best interests of the country.

I worked for a number of years doing research to try and reduce alcohol-related problems, with a particular focus on the impacts of alcohol advertising (the topic of my doctoral thesis). I am therefore very aware of the power that the liquor, advertising and broadcast industries have on policy decisions in this area. I have worked in other health and social good areas, where similar issues apply.

I believe it is unfair to put political parties in the position where they have to be beholding to vested industry groups and individuals. It would be a tiny amount of the annual government budget to provide government funding for the campaigns of each party. It would seem to be a no-brainer for politicians to want this!

Proactive Release

Response ID ANON-VKQE-1U2A-G

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-13 14:26:20

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I'm uncomfortable with the proposed requirements for Rule 3. I feel that removing the requirement to identify donors and amounts to the Electoral Commission to be a retrograde step and will encourage people to be less than transparent and open.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

I'm okay with these proposals. Why? Because the more discipline parties are subjected to the better.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Couldn't agree more. A ban on anonymous donations should be an absolute fundamental rule.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UAC-1

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-22 07:41:37

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

I do, on all points.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes to all, to avoid anyone attempting to skew actions in their favour.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

It makes large organisations and rich individuals/consortiums think twice about trying to influence Government decisions if their names are out in public domain.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

It is time Government realises it is for the people and therefore acts on the issues they were elected for.

Response ID ANON-VKQE-1UDU-P

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2021-12-06 22:42:49

Have your say

Tell us about yourself

What is your full name?

Name:

s9(2)(a)

What is your email address?

Email address:

s9(2)(a)

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

Yes I do, although I do not think they go far enough.

I would like the threshold for public disclosure to be lowered to \$50 at least.

I would like all anonymous donations banned and all donations from organisations banned as well

I would prefer elections in NZ to be entirely publicly funded and for parties to only receive funding from the taxpayer or from individuals in amounts no more than \$1000 per year and for that information to be publicly available.

I do not have faith or trust in an electoral system that allows parties to be funded by business/special interests or large donations from individuals. It erodes confidence in a democracy when some people have greater sway over the politics in NZ than others due to their financial situation.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

Yes I do, although I do not think they go far enough.

I would like the threshold for public disclosure to be lowered to \$50 at least.

I would like all anonymous donations banned and all donations from organisations banned as well

I would prefer elections in NZ to be entirely publicly funded and for parties to only receive funding from the taxpayer or from individuals in amounts no more than \$1000 per year and for that information to be publicly available.

I do not have faith or trust in an electoral system that allows parties to be funded by business/special interests or large donations from individuals. It erodes confidence in a democracy when some people have greater sway over the politics in NZ than others due to their financial situation.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Yes I do, although I do not think they go far enough.

I would like the threshold for public disclosure to be lowered to \$50 at least.

I would like all anonymous donations banned and all donations from organisations banned as well

I would prefer elections in NZ to be entirely publicly funded and for parties to only receive funding from the taxpayer or from individuals in amounts no more than \$1000 per year and for that information to be publicly available.

I do not have faith or trust in an electoral system that allows parties to be funded by business/special interests or large donations from individuals. It erodes confidence in a democracy when some people have greater sway over the politics in NZ than others due to their financial situation.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Please end anonymous donations, only allow very small donations from individuals only, never business or other organisations. Less than \$50

If people are able to use their financial positions to impact our democracy then how can ordinary citizens ever be expected to trust it?

Proactive Release

POLITICAL PARTY FUNDING SUBMISSION

THE GAMA FOUNDATION
P O BOX 6066
CHRISTCHURCH 8442

gama@xtra.co.nz

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Background and experience
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BACKGROUND AND EXPERIENCE

In 1995 Grant and Marilyn Nelson sold a large business and put the proceeds into establishing The Gama Foundation. Since then they have worked full time in the charitable sector and during this time have witnessed how in New Zealand social and environmental problems have been getting steadily worse because business, farmers and the wealthy use their money and influence to get the Government decisions they want.

In 2012 The Gama Foundation established the Institute for Governance and Policy Studies in the School of Government at Victoria University of Wellington. One of its main objectives was to carry out research on political party funding, lobbying and the other activities of vested interests. Unfortunately, staff decided that they would not do much work in this area and the only significant output has been an issue of Policy Quarterly on vested interests in May 2021. This is an academic journal and the authors of articles on vested interests may not have had any practical exposure to what actually goes on. When we have tried to deal with social and environmental problems, we have often encountered situations where politicians have not done what they said they would do and have made decisions that are clearly not in the best interests of the community and future generations. We have also read about many similar situations. The only possible explanation for what has happened is that vested interests have used donations followed by lobbying and other activities to get what they want.

Attached are news media articles about political party funding that we have copied over the past two years. If some authors of these articles have not made submissions, their articles would be worth reading.

INTRODUCTION

There have been numerous articles and items published and broadcast over many years about the problems facing the environment and society but usually only token gestures have been made towards dealing with them. As the rich grow richer and richer, their control of political parties grows stronger and stronger. This needs to be reversed if democracy is to survive.

Politicians have known for 15 years that housing was becoming increasingly unaffordable but failed to take any worthwhile action. Home ownership is now not possible for the majority of citizens and rents take up a high proportion of incomes. Unlike most other countries New Zealand does not have a capital gains tax so the situation is going to get even worse.

A Newsroom article on 9 December 2020 stated. "Previously, Winston Peters blocked anything that looked like a capital gains tax. Some of his supporters like Conrad Properties (big donors to the controversial NZ First Foundation) had lobbied against it."

When the current Prime Minister was elected in 2017 she said that she wanted to make big improvements in the areas of child poverty, inequality, unaffordable housing, freshwater and climate change. It appeared that big changes were going to be made but during the past few years these problems have continued to get worse, not better. At the same time those who are well off have been given a huge amount of taxpayer money and assistance so there has been a huge transfer of wealth to them.

Sir David Skegg wrote in his 2019 book 'Health of the People' about how the donations and lobbying of the alcohol and tobacco industries got the Public Health Commission abolished. While it spoke out about the dangers of alcohol and tobacco, one of its main functions was to prepare for a pandemic. The demise of the Commission and the underfunding of public health meant that New Zealand was not well placed in early 2020 to deal with the Covid-19 pandemic.

Business New Zealand met with the Prime Minister on 2 March 2020 and they put forward a wage subsidy scheme that was approved by Cabinet two weeks later. By October 2020 businesses had \$22,700 million more in the bank than in October 2019. This was a 24% increase but businesses have never been asked to repay huge overpayments of subsidies. During the past two years we have done a lot of research on the wage subsidy and found that over \$5000 million was wrongly obtained or retained and about half as much again was not actually needed. The Auditor-General said that the MSD had failed to properly investigate and prosecute anyone. This compares to the MSD prosecuting up to 450 beneficiaries each year.

On 7 December 2021 well known economist and commentator, Bernard Hickey, wrote an article for 'The Spinoff' and said that "New Zealand's economic response to Covid was among the worst in the world in terms of widening wealth inequality and the wasteful use of taxpayer funds. Asset owners' wealth is on track to rise by \$872 billion or 50% to \$2.63 trillion within two years of the outbreak. Working families and

beneficiaries who pay rent are now mostly worse off or barely treading water.” This article confirms the research we have done and indicates that the donations, lobbying and other activities of vested interests have won out over the best intentions of the Prime Minister and Government. The Treasury has now advised the government to cut spending .

On 9 January 2022 Newsroom published an article by climate change commentator Rod Oram in which he said that Government climate change plans were almost worthless and involved large taxpayer subsidies to farmers and businesses.

It is clear that what members of Parliament say they would like to happen, takes second place to what political party bosses want if they are to get the money required to undertake a successful election campaign.

The top priority for the main political parties is to gain or retain power and to do this they have to spend a lot of money on social media and election campaigns. Almost all of the money they receive comes from those who are already well off and if they are to continue handing over money each year, they need to get a payback. Large donations can help get access to a Minister who has little time for making decisions. Most Ministers lack the knowledge and experience required for critical decision-making so can easily be persuaded that what a lobbyist wants will benefit the country and the short term interests of the party. (Refer to the attached Bryce Edwards June 2021 cash for access article)

If a politician gave help to those who gave them money or other assistance, those involved could be charged with corruption. To avoid this happening, money is given to political parties and they arrange for help to be given to the whole industry that the donor belongs to. This comes at a huge cost to ordinary taxpayers and society.

The excessive borrowing and wasteful spending by the Government in 2020 and 2021 resulted in a huge transfer of wealth to those who were already well off. The \$50 billion increase in Government debt and the huge increase in house prices has been disastrous for a third of society and for future generations. If urgent action is not taken to curb the power of vested interests, then the situation will continue to get steadily worse.

OVERSEAS EXPERIENCE

Other democracies have experienced the frequent corruption resulting from political party donations, lobbying and the other activities of vested interests so they have introduced far stricter rules than we have here. Our lax rules and complacency mean that unacceptable arrangements can be made behind closed doors without any risk to the participants.

The current New Zealand donation caps are far too high. In Canada for example, citizens are limited to C\$1500 and only up to C\$100 can remain anonymous. Businesses and other organisations are not allowed to make donations

PREDICTED OPPOSITION TO CHANGES

1. Vested interests, who make a lot of money by providing funding for political parties, will make submissions and use lobbying and other means to try to convince the Government and officials that any changes are a bad idea. They will have had the motivation to spend a lot of time and money organising submissions over the Christmas rush and holiday period. On the other hand, members of the public will probably not know about the proposals and, if some do, it is unlikely that they would have the inside knowledge and experience to make a detailed submission. Surveys consistently show that the public has extremely low trust in politicians and most people have a fatalistic attitude to what goes on behind closed doors. Our news media do not have the resources to carry out sting operations and the public have been conned into believing that New Zealand is corruption free so it is unlikely that many people will do the necessary research and make well informed submissions in the short time available.

2. When compared to other countries that are perceived as being more corrupt, New Zealand has very poor regulation of political party donations and no proper regulation of lobbying and the other activities used by vested interests to get the decisions they want. Whenever the need for substantial improvements is raised, it is common for those who are opposed to change or ignorant of what goes on to say that New Zealand is one of the least corrupt countries in the world according to Transparency International. In 2012 we provided some funding to Transparency International New Zealand and since then have monitored its activities but not given any more money. The reason for this is that the main objective of TINZ is to ensure that New Zealand maintains a high perception rating in order to help businesses make more money. When corruption has been exposed, TINZ has refused to comment or has issued a diversionary news media release about corruption elsewhere in the world. The perception rating relates to countries where Government officials receive a low rate of pay and are expected to supplement their income with user pays bribes. This does not happen here so the rating is of little value, particularly as we have far more sophisticated corruption in the form of party donations, lobbying and other activities. The perceptions rating is in reality only the vague ideas of a few people in other parts of the world who lack the time, knowledge and resources to arrive at any sort of meaningful perception. The small size of the New Zealand population, the lack of reporting by TINZ, the false 100% PURE advertising and the reputation of the current Prime Minister could all affect the perception of New Zealand. TINZ does not reveal who funds its work. Its reaction when questioned about the SFO investigations was to say that controls were needed on overseas money and that there was a lot of complacency about corruption and a select committee of politicians should look at making changes. This ignores the fact that when scandals have arisen in the past, the two main parties have only made the changes that suited them.

3. Some people claim that three wealthy people each tried to establish a political party but failed to get over 5% of the vote so this shows that money does not affect election results. This is not correct because the two main political parties have been getting free publicity in the news media on a daily basis for many decades and this gives them a huge advantage. The Green Party is well established and has policies aimed at improving the social and environmental problems that affect most voters

but it struggles to get over 5% of votes at each election. Most people are reluctant to vote for third parties because their vote will be wasted if they do not get over the 5% threshold. Another reason is that right wing parties put some of their large financial and other resources into anti small Party branding. They pay retainers to journalists, commentators and social media influencers who are ready to say whatever is required.

4. Claims are made that any changes would restrict freedom of speech but more money buys more access to voters. In 1936 the New Zealand National Party was formed to look after the interests of businesses, farmers and those on higher incomes. They represent about 20% of the voting population so it is necessary to spend a lot of money to convince other voters to vote for the party. Longtime National M P and retired Minister and Speaker, Sir David Carter told RNZ on 9 August 2021 that "When we did a substantial review after the devastating defeat at the last election, two things were evident in that review." One was the dysfunction of the governance of the party and the other was a lack of money to run a suitable campaign." Published figures show that in 2017 and 2020 the Labour Party received about \$1.6m and \$1.5m and the National Party \$4.6m and \$2.8m. Clearly, the National Party relies heavily on getting a lot of money from vested interests in order to gain and retain power. A large proportion of this money is used for social media and other activities that are not open to public scrutiny. The 2014 book 'Dirty Politics' was able to document some of these activities as a result of a computer hack.

5. Claims are made by party leaders that they do not know who has given money to their party but recordings made by Jami-lee Ross in 2018 clearly show that he and his party leader were well aware of large donations and had dinner with donors and that money could even buy a good place on the party list.

6. Claims are made that those giving money are doing so to support democracy but this seems very unlikely in view of the extremely low levels of trust in politicians and political parties. Vested interests giving money expect to get a big payback so when this is delivered it undermines democracy.

7. Claims are made that SFO investigations show that the system is working but the reality is that politicians and political parties are prepared to circumvent even very lax rules in order to get the money and other assistance they require in order to obtain or retain power. The old saying that "power corrupts and absolute power corrupts absolutely" rings true.

8. Claims have been made that the public would not accept taxpayer funding of political parties but these claims have been promoted to the public by those who get huge benefits from the existing system. If the public were educated about the advantages of taxpayers funding political parties, this would increase support for changes to be made.

THE NEED FOR CHANGE

1. The information already outlined in this submission supports the need for substantial changes to be made starting with rules regarding political party donations.
2. Other developed countries that are perceived by a few people as being more corrupt than New Zealand have much stricter rules to try to prevent the corruption of political parties. They also often have better labour and consumer protection laws and other legislation that puts the interests of the community ahead of business and farming interests
3. There are numerous examples of how New Zealand political parties have assisted vested interests at the expense of the community and future generations. Democracy has been undermined and the situation is getting steadily worse. New Zealand may have a higher level of corruption than many other similar countries on a per head of population basis due to lax rules, complacency and lack of news media investigations.
4. The current investigations by the Serious Fraud Office demonstrate that political parties readily exploit and circumvent even the most inadequate of rules regarding funding.
5. A 2020 survey by Victoria University of Wellington found that 34% of the public believed that corruption was widespread throughout the Government in New Zealand and that 71% had no or very little confidence in how political parties are funded. Only 6% had trust in politicians and political parties. These disturbing findings indicate that action is now required on political party funding and that a Royal Commission of Inquiry is needed to recommend major reforms rather than relying on political parties to decide on what changes they would like to make. Commentators generally agree that stricter reforms than those proposed are needed but they say that politicians cannot be trusted to make the reforms that are in the best interests of the community (Refer to article by Bryce Edwards)
7. Few voters have a good knowledge of the policies of political parties when they vote at an election. Voters are subjected to a lot of misinformation on social media and have been conditioned to not trust anyone and to take the easy way and just vote for the leader they like best. It takes a lot of money to promote this to the public so strict controls are needed.
8. When the proposals were announced, the Prime Minister said “We're genuinely interested in what we could do to really shore up people's trust in their democracy” The only way to do this will be to introduce a range of measures starting with controls on political party donations.
9. Improving transparency, openness and compliance would be useful but the main aim of any reforms has to be to introduce rules that prevent vested interests from handing over money in order to get the policies and decisions they want from political parties who have become increasingly dependent on them. Taxpayer funding would be needed to make up the funding shortfall.

RECOMMENDATION 1

TAXPAYERS TO BE THE ONLY FUNDERS OF POLITICAL PARTIES

If political parties were only funded by taxpayers, it is probable that most Government decisions would be made in the best interests of the community and future generations and the average person or family would be thousands of dollars better off each year.

(Refer to articles by Catriona MacLennan and Simon Chapple)

A public education campaign would be required to show the public that taxpayer funding was in their best interests. An independent panel of overseas experts could regularly report on the honesty of political parties and on how their policies were being implemented. Penalties could be imposed on parties that failed to maintain high standards of honesty and integrity.

If funds were provided to each political party based on the number of individuals being signed up for a \$5 membership fee per election cycle by independent volunteers, this would force political parties to promise and deliver the policies that the average citizen wants rather than go after big money by privately promising and delivering whatever businesses, farmers and well off citizens want.

Political parties know that if they are to receive a continuous flow of money from large funders, they must provide a big payback at the expense of the taxpayer or consumers. Businesses should be banned from giving money and other assistance, as happens in Canada and some other countries, and the maximum payment by individuals should be the \$5 membership fee.

Politicians and political parties have all the wrong incentives so have badly failed voters over recent decades. They are currently not required to work in the best interests of the country but they should be made to do this rather than spending a lot of time trying to please vested interests and get money from them. Total taxpayer funding would protect and strengthen democracy and reduce the chances of voters supporting non establishment extremists like Trump.

RECOMMENDATION 2

If total funding of political parties is not regarded as being acceptable, the following should be implemented:

1. Political parties to disclose the identity of donors for annual donations of over \$200. (Compared to Canada C\$200 and Ireland E100) Donors to be only individual citizens, as is the case in Canada.
2. Increase the frequency of reporting of donations by political parties to once a month.
3. No political party donations made during a three year election cycle to be over \$1500. (Compared to Canada \$1500 and Ireland E2500)

4. Donations over the cap of \$200 to remain anonymous if sent to the Electoral Commission to be amalgamated with other donations before being sent to the nominated political party.
5. Detailed disclosures of in-kind (non-cash) donations to be made. For example, cash for access dinners, donation of goods for auction, providing expertise services or news media general advertising promotion.
6. Political parties to release their annual financial statements and be subject to investigation and audit by the Electoral Commission.
7. Loans to political parties and candidates to be banned in order to prevent political parties being dependent on those who make loans.
8. Businesses, farming and business organisations and trade unions to be not permitted to make donations or give other assistance
9. Determine the total donations received by all political parties in 2018 2019 and 2020. Take the total and work out an average per seat. Multiply this average by the number of seats held by a party to work out their donations spending cap through to the next election. The average per seat would be adjusted for inflation at subsequent elections. Taxpayers would have to top up the shortfall in funding due to the lower donations allowed.
10. All assistance of any kind to political parties to be disclosed and any secret assistance given and received to become a criminal offence.

RECOMMENDATION 3

ANONYMOUS DONATIONS

Political parties to state that donations over \$200 should be sent to the Electoral Commission. These donations would be amalgamated and then sent to the nominated political parties. This would ensure that larger donations were anonymous and would deter those who give money in the expectation of getting a big payback.



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Latest news and upcoming events from the Institute for Governance and Policy Studies

Editorial: Regulating money in New Zealand politics

IGPS Director Simon Chapple on the political donations question

In the aftermath of the controversy surrounding former MP Jami-Lee Ross and opposition National party leader Simon Bridges, discussions have focused on possible reforms of political donations in New Zealand.

My colleagues [Bryce Edwards](#) and [Michael Macaulay](#) have raised the issue of taxpayer funding of political parties. So too has [Minister of Justice Andrew Little](#).

Green Party MP Marama Davidson has suggested the donation threshold for the disclosure of a



donor's name and address be lowered from NZ\$15,000 to NZ\$1,000. She has also proposed banning foreign donations outright and capping individual donations at NZ\$35,000.

Several of these proposals warrant further discussion and contextualisation.

Foreign interference in domestic politics is an increasing phenomenon worldwide.

Currently in New Zealand foreign donations to a party of up to NZ\$1,500 are permissible. Moreover, foreign donations below this amount are not individually or collectively disclosed.

It would be easy for a foreign state or corporate body seeking political influence to channel a large number of donations into the system just under the threshold via numerous proxies. Whether such interference has been happening is unclear, since New Zealanders do not know how much money currently comes in to political parties via foreign actors.

Even if foreign donations are not a problem now, one could rapidly develop. A strong argument can be made that foreign money has no place in democracy, including New Zealand's.

New Zealand would not be going out on an international limb by banning foreign donations. Foreign donations to political parties are not permissible in the [United Kingdom, Ireland and the United States. They are also banned in Canada but unfortunately a **significant loophole** exists. Australia is currently in the process of banning foreign donations.

As noted, the threshold below which political donations can be anonymous could be lowered. A lower threshold would make it more difficult to evade name disclosure rules by splitting donations and attributing each part to a different donor.

Splitting may be what happened to the **alleged NZ\$100,000 Yikun Zhang donation**. The NZ\$1,000 threshold proposed by the Greens would be a huge improvement on the status quo. A donor of NZ\$100,000 seeking to evade legislation and to remain anonymous would have to coordinate 100 individual donors, rather than seven.

But New Zealand could go lower still, to NZ\$200, without being radical. Giving NZ\$200 to a political party is huge for an ordinary New Zealander, and the reality is only a very small minority would need to disclose their names under such a law.

There is international precedent for setting much lower thresholds for



anonymity than the Greens propose. For example, in Canada, the maximum amount of an anonymous donation was set at C\$200 in 2015, while in Ireland it is currently €100.

One concern with non-anonymity is that it delivers public transparency at the cost of private donor privacy. Currently the Electoral Act 1993 contains a mechanism for anyone wanting to donate to a political party and not wanting their identity disclosed to either the public or to the party receiving the donation. To obtain such anonymity, the donation needs to be more than NZ\$1,500.

The Electoral Commission aggregates all such donations. It passes them on to parties at regular intervals. It does not identify the dollar amount of individual donations, or the number or names of donors.

Not many donors use this protected disclosure avenue. For example, between September 2015 and June 2018, the commission passed on only NZ\$150,000 in anonymised money to parties via [this channel](#). At the same time amounts well in excess of NZ\$10 million were passed on by donors identifiable to political parties (but not necessarily to the public).

A preference for identifiable channels suggests current donors get value from non-anonymity. It implies most donors feel they are buying something. The fact that donors feel they are buying something should be cause for concern.

The Greens have suggested NZ\$35,000 as a maximum cap on donations. Again, New Zealand could go much lower without being out of step with other countries. For example, in Canada donations to each political party are capped at C\$1500 a year. Like Canada, Ireland has a maximum annual cap of €2500.

However, Geoff Simmons, leader of the Opportunities Party, has argued that a cap would [make it difficult for small parties to get started](#). Simmons' party was kick-started by large donations from multi-millionaire Gareth Morgan, who was also the party's first leader.

Another possibility for the reform agenda is the Canadian approach of only permitting donations from individual people. Corporate and trade union donations are banned. However this proposal is unlikely to be popular with neither National, which receives considerable corporate donations, nor Labour which traditionally gets significant trade union funding.

All these proposals, inevitably, have pros and cons and possible unintended consequences. They are deserving of wide public debate. One hopes that the current government can provide the public with a credible forum for such discussions, and a clear pathway to sensible future reform.

- This editorial was initially published on [The Conversation](#)

Are Electricity Prices Excessive?

Did you imagine those decades of high electricity prices? According to the first report from the current Electricity Price Review, there is "nothing to suggest distributors are making excessive profits".

It's a startling finding, and IGPS Senior Associate Dr Geoff Bertram has a simple explanation for it: the price review looked only at the past five years of data, from 2013 to 2017. What would we find if we took a longer view? Dr Bertram cordially invites you to a detailed discussion of prices -- reasonable or otherwise -- across the Wellington and Hutt electricity networks over the past three decades.



Date: Monday 12 November

Time: 12:30 pm – 1:30 pm

Venue: RHLT2, Lecture Theatre 2, Rutherford House

RSVP

School of Government events



Advancing Better Government

2018 Sir Frank Holmes Memorial Lecture in Policy Studies

PRC

Professor Girol Karacaoglu, Head of the School of Government, Victoria University of Wellington, has pleasure in inviting you to the 2018 Sir Frank Holmes Memorial Lecture in Policy Studies, given by [Lord Gus O'Donnell](#), former British Cabinet Secretary.



Global problems and national solutions: building better states and better global architecture.

This lecture looks at some of the big, wicked challenges facing advanced countries. It considers whether our governments and our global institutions are capable of finding and implementing solutions in time to continue improving the quality of our lives.

Date: 6.00pm, Monday 12 November 2018

Venue: RHLT2, Lecture Theatre 2, Rutherford House
[RSVPs essential by Thursday 8 November](#)

Doors open at 5.45pm. Lecture starts at 6.00pm refreshments will be served after on the Mezzanine level.

Quixotic or essential: Sir Peter Gluckman on science advice, public policy and the post-truth dynamic

Over the past decade New Zealand has developed a science advisory mechanism to assist the executive of government. This development can be seen as part of an international trend to enhance the science-policy interface (using science in the broadest sense to encapsulate the robust knowledge disciplines). This interface is complex and multidimensional. Scientific evidence assist the decision-making process leading to enhanced choices between policy options, but there are significant issues on the supply side, the demand side and at the interface. There is no area of government where robust evidence cannot advance the policy process. Data alone are not information, information without expert analysis is not knowledge, and knowledge itself only becomes evidence when appropriately applied to the question in hand.

Sir Peter will review current thinking about the processes, structures and skill sets needed to improve the incorporation of evidence into policy. It is essential that these processes are robust; however, the trend towards applying generic policy evaluation methods rather than deep domain expertise can crimp the potential for robust evidence to usefully impact on the policy decisions.



New challenges are emerging. These include the size of the scientific enterprise, the incorporation of different epistemologies, the confused state of accessible and reliable knowledge on the web, and the impacts of digitalisation that will allow Big Data and AI to impact on public policy. While New Zealand has been at the forefront of these latter areas with the Integrated Data Infrastructure programme, major issues have emerged and will continue to emerge, in part because of the failure to get adequate data governance in place.

The so-called 'post-truth' dynamic, which has yet to extensively infect New Zealand, undermines the role of evidence in policy-making. In the current international political climate it is becoming ever-more apparent that robust evidential input into policy is a core part of protecting democracy. Sir Peter will use examples from his experience to explore these issues and reflect on general and emerging principles relating to all-important knowledge brokerage. He will also highlight some research questions he is hoping to address.

Date: Friday, 23 November 2018

Time: 12.00 – 2.00 pm (Lecture commences at 12.15 pm)

Venue: RHLT1, Lecture Theatre 1, Rutherford House, Pipitea Campus, Wellington

RSVP

XXIII International Research Society for Public Management (IRSPM) Annual Conference 2019



School of Government



**ReNewing Public Management for Stewardship,
Innovation and Impact**

**Victoria University of Wellington
16 - 18 April 2019**

Call for abstracts is now open. See the website for a full list of the panels. Abstracts are due by 19 October.

Other Events

How do public managers really use the performance information we all collect so diligently?

What can New Zealand learn from international research, and vice versa?

Every year across the world, public managers and contracted public service providers diligently collect, analyse and publish massive amounts of performance data – what our speaker Donald Moynihan has poetically described as new rivers flowing into the existing sea of data.

New Zealand is a leading jurisdiction in our willingness to publish performance data about how well (or not) we are doing in serving our citizens. But how much influence does all this data, collected with so much system-wide effort, have on our decisions and what are the key success factors?

Please join our internationally renowned expert on Thursday 1 November 2018 for a lively discussion on the how and why of better utilizing performance information and where NZ fits into this landscape.

Moderator: Barbara Allen, Senior Lecturer in Public Management at the School of Government at VUW

Date: Thursday 1 November 2018 at 12.30pm

Venue: CAANZ Building, Level 7, 50 Customhouse Quay

Time: Guests are welcome to arrive between 12.00 and 12.30pm for a light lunch and networking, with the event being held from 12.30 to 1.45pm.



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20 Feb 2020

Cat MacLennan: Time for state-funded political parties to replace donations

1:05 pm on 20 February 2020

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By Cat MacLennan*

Opinion - For donations to two of New Zealand's largest political parties to be investigated by the Serious Fraud Office in the same year appears to be more than an unfortunate coincidence. Rather, it seems like a clear signal that something is seriously wrong with our political party funding rules.



Photo: RNZ / Dom Thomas

The Serious Fraud Office's investigation of large donations to the National Party has resulted in [four men being charged](#). The regulator's [probe of issues](#)

relating to New Zealand First is only just beginning, so an outcome is some time away.

However, what is plain is that our political party funding rules are not fit for purpose. And politicians cannot be trusted to fix them.

Political parties tell the public that money buys neither influence nor policy and that MPs - and particularly party leaders - are kept insulated from donations and do not know who contributes. That has always seemed difficult to believe, since it is obvious that a common reward for donations is access to dinner or meet-and-greets with party leaders or Ministers.

The tape released by Botany MP Jami-Lee Ross of his conversation with National Party leader Simon Bridges showed that Bridges knew not only the names of donors, but amounts. The donors had dined once with Bridges and another meal was planned.



Jami-Lee Ross talks to media after it was revealed the Serious Fraud Office was investigating his complaint about disclosure of political donations. Photo: RNZ / Craig McCulloch

The corrosive influence of money on politics is clearly apparent in other countries. In the United States, gun control and action to address climate change are stymied by politicians' fear of upsetting large donors. The United States' 2018 mid-term elections were calculated to have cost close to \$6 billion.

In the December 2019 British election, the Conservative Party in the first two weeks of the campaign broke the record for the most money raised in an election, with large, pro-Brexit donors pouring £12m into the party's coffers. The Conservatives' Leader's Group rewards people who donate at least £50,000 a year with dinner with the Prime Minister.

In Australia, a 2018 Grattan Institute report showed that up to 40 percent of donations to political parties in the preceding decade came from untraceable sources, with \$AU62.8m in party funding - in 2017 alone - being hidden.

It would be nice to believe that all these donors give money simply to support the democratic process, which is their common explanation. However, the clear correlation between large donations and parties with business-friendly policies suggests a less benign motivation.

It does not have to be like this. New Zealand should accept that there is a problem with our political party funding and remedy it by introducing state funding of political parties. This would place parties on an even footing and make elections a contest of ideas, not dollars.



Photo: 123rf.com

Many other countries have already done this. Public financing of political parties takes place in Canada, Sweden, Germany, Australia, Spain, Austria, Israel, the Netherlands, Poland, France, Japan and Mexico.

The ACE Electoral Knowledge Network says that, out of a sample of 180 nations, 25 percent provide no direct or indirect funding to political parties, while 58 percent give direct public funding. However, the fact that so much secret money still pours into Australian political parties demonstrates that it is not enough merely to introduce public funding. Other safeguards must also be put in place.

It is the public that must demand this. MPs have made numerous changes to donation laws over the years, but their common characteristic has been that they have effectively amounted only to tinkering. They have failed utterly to

address key concerns, or to prevent parties from doing their best to hide donors' identities.

New Zealand political parties have always been reluctant to support state funding as they believe it will be unpopular with the public. That is a poor excuse.

Politicians - and others - need to explain to the public that state funding of political parties is not feathering the nests of already well-paid MPs. Rather, it is an investment in protecting and strengthening our democracy.

*** *Cat MacLennan is a barrister and former political reporter.***

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'THE ROOT OF ALL EVIL IS DEEPLY ROOTED', AS ONE LAW REVIEW TITLE PUT IT. ILLUSTRATION: TOBY MORRIS

Money talks: Why the donations crisis goes to the heart of trust in our politics

Andrew Geddis | Contributing writer
Commentary

Today The Spinoff launches a week-long series on politics and funding. With a host of donations under scrutiny, we'll ask: how did we end up in this predicament, and how might we fix it? Launching the series, Otago University law professor and electoral law expert Andrew Geddis explains why the subject is of such fundamental importance to our democracy.

This series is made possible thanks to Spinoff Members. [Join Members to support more of this work.](#)

As soon as human societies began to accord exchange value to cattle, cowrie shells or shiny pieces of metal, money and politics became linked.

After all, both represent forms of power. Everybody needs money – that's why they call it "money". (A line that admittedly sounds much better when [Danny DeVito says it](#) than it does written on the page.) And politics is, at its core, all about the distribution and deployment of social influence and authority.

The repeated use of one form of power to obtain and buttress the other is then seen across time and place. Political spending in the Roman Republic became so rampant that it arguably [ended that system of rule](#). The [potlach ceremonies](#) among First Nations peoples in what is now northwestern Canada and the US used ritualised gift giving to "display and legitimate class, rank, privilege, kinship, and marriage". President Suharto, the dictator of Indonesia from 1967 to 1998, is estimated to have accumulated some US\$15-35 billion over his time in power.



MONEY TALKS

The crisis in NZ political donations

But the link between the two becomes particularly problematic in the age of liberal democracy, where freely elected representatives are then expected to act in the interests of those they govern.

Money's ubiquity means it is required for virtually any sort of election-related activity. Sure, there may be the odd candidate able to win a local council seat [without spending anything on advertising](#), but even they will incur costs for petrol and the like.

Scale up to nationwide elections, where, in New Zealand's case, you need to communicate a political party's message to some three million voters in a way that will convince them of its merits, and an adequate supply of money becomes critical. It's noteworthy, for example, that all of the last three "big splash" attempts to enter our national political scene share something in common.

Kim Dotcom's "Internet Party". Colin Craig's "Conservative Party". Gareth Morgan's "The Opportunities Party". All basically dependent on the deep pockets of their leader/benefactor.

Of course, each of these examples also proves that while having money may be a necessary ingredient for political success, it is far from a sufficient one. Even spending millions of dollars cannot compensate for a fundamentally flawed product.

Proact





KIM DOTCOM AT THE 'MOMENT OF TRUTH' RALLY. PHOTO: GETTY IMAGES

Equally, a strong political kaupapa may overcome a relative lack of funds, as the [Māori Party's comparative success on the](#) smell of an oily rag showed at the 2008 election. So, any simple claim such as “more money buys more political success” is clearly false.

Which is not to say that an opposite claim – “money is irrelevant to political success” – is clearly true. Any candidate or party who tries to argue this is the case should be asked a very simple question: why do you accept donations from supporters, and are you perpetuating a fraud on them when you do so?

Because it's a pretty safe bet that any candidate or party given the choice of either facing an opponent possessing twice as much money or one with a smaller amount of money will plump for the latter option.

After all, if money *might* make a difference in the contest you're involved in, then you would be a mug to go into it at a significant disadvantage.

That fact creates problems in itself. It generates something of an arms race situation for candidates and parties, where having “enough” money depends upon how much your competitors have.

New Zealand does try to limit this effect by placing caps on how much parties or candidates can incur in “election expenses”. Those caps, however, only apply to relatively narrow range of election activities; in essence, election time advertising. Activities like opinion polling, running focus groups, candidate travel, hiring campaign advisors, hiring campaign offices and the like are not covered. Nor does the cap on spending include any advertising carried out before the three-month pre-election period. Recall why [Simon Bridges was so happy](#) to hear from Jami-Lee Ross about the now infamous \$100,000 donation:

Um, look, I just think we want it for, uh, the advertisements and the like, you know? We want it for the things that we're gonna need to do over the next year or so, sort of outside of the – not outside of the party but um, uh, you know, like I say we want to do some more attack ads – say we want to do another regional fuel one, say we want to do an industrial relations one. We just want to keep doing those things, right?

So, the amounts that candidates and parties incur for “election expenses” each campaign represents but a fraction of the total that they actually spend on seeking election.



SIMON BRIDGES AND JAMI-LEE ROSS (PHOTOS BY HAGEN HOPKINS/GETTY IMAGES)

Getting in enough money to fund those campaigns to a level that is competitive with (or even better, greater than) your opponents then becomes crucial. If you can't self-fund (see Kim Dotcom, Colin Craig, Gareth Morgan), you have to go out to supporters and solicit donations from them.

Which creates a potential problem for a representative democracy like New Zealand. Remember that elected representatives are expected to act in the interests of those they govern. That's the basic deal we make when we vote – you have our consent to exercise power over us, provided you then use it in the right way.

Now, determining what those interests are and how power should be used to serve them can sometimes be, to quote Darryl Kerrigan, “a bit

iffy”. The whole reason politics exists is because different people will have different views on what they are and how they best can be met. There’s a good reason why we have an ACT Party and a Green Party and a Māori Party (and a whole host of other parties) all advocating their different policies.

But one thing that definitely has to be off the table in a properly functioning system of representative democracy is any idea that elected representatives will make decisions based purely on who is paying their bills. Making such explicit transactions – “because you did this good thing for me, I’ll use my political power for you” – is considered to be [a serious crime](#) (as [Philip Field discovered](#) in 2009).

Even absent such direct quid-pro-quo deals, reliance on private funding of our national politics still poses a problem. Because, whisper it, the money that parties seek to fund their activities is not evenly distributed in our society. You only have to look over the list of disclosed donors to [National](#) or [Labour](#) (or [undisclosed donors to the NZ First Foundation](#)) to see that disparity in action. There’s not many amongst us that could even contemplate making a \$15,000 (let alone \$150,000) donation to the political party of our choice.

Yet remember that our governing compact – representatives have our consent to exercise power over us, provided they then use it in the right way – is premised on an assumption that we all should have an equal say in who gets to govern. We’ve long since rejected John Stuart Mill’s proposal that some people deserve to cast more votes because they have better ideas about how to run our society.

Why, then, do we allow for unlimited private funding of those who are competing for public power? Isn’t that a form of potential political influence that is just as important, or maybe even more important, than actually casting a vote? Put it this way, if I were to say to a candidate or party, “I’ll either give you \$100,000 or my vote on election day,” which option do you think would get chosen?

Sure, we may say such “big” donations then have to be disclosed (albeit that such rules are looking a little bit shaky just at the moment), but that doesn’t really address the basic inequity of the situation. There’s a very small group in our society whose wealth alone gives them greater capacity to take part in deciding who will govern us all.



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What, though, is the alternative? Because we can’t hope to take all money out of politics; trying to starve such activities of resources is an invitation for even greater rule bending and outright illegal practices.

Furthermore, we really shouldn’t try to do so. Having different parties and candidates (and other groups as well) all out advocating for their best views of society and its future is A Good Thing for us all. Prevent that from happening and, well, you destroy the entire basis of democracy.

Coming up with a satisfactory solution for all these sorts of issues is not easy. A [1989 law review article](#) (whose title I really wish I’d thought of) defines the problem nicely: “On Campaign Finance Reform: The Root of All Evil is Deeply Rooted”. But these are issues that we really do have to think about.

RFor at the base of it all lies the fundamental question of whether we can have trust in the process that determines how we all will have to live together. Once that trust is lost, then we no longer have a basis for making such decisions. And without that, well, we really don’t have anything to go on at all.

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Political Roundup: Fixing the problem of money in politics

New Zealand has a problem with money in politics. National and NZ First have been the subject of Serious Fraud Office investigations. And now that Labour mayors Phil Goff and Lianne Dalziel have been added to the list of fraud investigations, this should cement in the fact that we have a problem across the political spectrum, and at central and local government levels.

But what to do about the problem? A debate is now underway about how to fix the problem of money in politics. I've written an opinion piece for The Guardian, arguing that we can't trust the politicians to fix this, because their self-interest is precisely what has led to a situation where poor regulation allows wealthy interests to dominate the political process – see: [Vested interests in New Zealand politics are too big to ignore – we need a Royal Commission](#).

We're way beyond the point where tinkering is an option, and I suggest that we can learn from the way that MMP was developed as a solution to problems with our old electoral system: "In the 1980s when a crisis of confidence was developing about the old First-Past-the-Post electoral system, the Labour Government of the time did the right thing by establishing The Royal Commission on the Electoral System. This made the case for our MMP system, which was eventually adopted by voters in a referendum. It's time for a new Royal Commission to take the problems of vested interests in politics out of the hands of politicians and come up with a fundamental rethink of how to deal with money in politics."

Danyl Mclauchlan has also written about politicians being part of the problem: "It's because they literally write the laws, and get to decide what is and is not legal, so the laws around political donations have been written with massive loopholes allowing parties to accept large donations and conceal the identity of the donors" – see: [The donations mess reveals a vacuum in our political system. Who will fill it?](#) He argues that "it's not in the short-term interest of any party in parliament to seriously fix our donation regime".

The problem is also made worse, Mclauchlan argues, by the lack of anti-Establishment forces in politics that might rally for major reform. In the past, this role might have been taken on by NZ First and the Greens, but both are hamstrung by current events or are no longer so radical: "now the Green Party occupies an ideologically incoherent space bounded by technocratic

centrism and campus wokeness, characterised by an obsequious, fawning fear towards Peters and New Zealand First.”

Former United Future leader Peter Dunne has said we simply won't get the necessary reform of wealth in politics because of politician self-interest, and he suggests any likely reform of donation rules will only produce more loopholes and workarounds – see: [Chances of transparent election campaign funding are close to zero because the politicians who call for it really don't want it.](#)

Here's Dunne's main point: “the more the rules are tightened and tinkered with, the more bureaucratic checks that are imposed, the one certainty is the more politicians and political parties will simply engage in even more elaborate ways of getting around them. And the more we should come to expect election years being clouded by the types of funding controversies we are seeing already this year.”

Of course, there has been reform of donation laws in the past, and this hasn't halted the problems or prevented scandals. For more on this, see Max Rashbrooke's [A brief history of New Zealand donations scandals.](#)

Rashbrooke concludes: “Past reformers have contemplated fixing all these weaknesses, but have ultimately shrunk back from the task. In the light of the accelerating pace of scandals, that stance is increasingly untenable.”

So, will we get reform? There are an increasing number of voices calling for big change, including a global anti-corruption watchdog – see Yvette McCullough's [Transparency International warns need for political funding reform is urgent.](#) According to this, “Transparency International is warning the need to reform political funding structures is more urgent than ever - and that complacency is leaving the country more vulnerable to corruption.”

However, the same article quotes Jacinda Ardern denying New Zealand has a problem: “That is not the New Zealand politics, that is not the New Zealand democracy I know. So actually I do reject that, I reject that strongly.” It also reports that an independent inquiry is unlikely: “Although Ardern promised to look at electoral finance laws if she was re-elected, she was inclined to have an in-house review through the normal select committee process.”

Proposed solutions

One of the more radical proposals for reform comes from Peter Dunne, who suggests radical

transparency, in which all donations are publicly declared: “all the financing provisions of the Electoral Act could be abolished and replaced with one simple overarching provision: every donation made to a candidate or a political party, whether in kind or cash, from overseas or within New Zealand, whether it be \$1 or \$1,000,000, should be fully disclosable.”

Dunne also argues that there is already generous state funding of political parties, via the backdoor of parliamentary resources. These are exploited, Dunne says, with the multi-million-dollar budgets actually spent on electioneering, all without any real oversight. He suggests: “a simple requirement for every MP and their party to file an annual audited return of their specific Parliamentary expenditure. The public would quickly prove to be far better monitors of what was reasonable use of public funds by politicians than any set of confusing, ambiguous and often contradictory Parliamentary rules could ever be.”

Most other writers on the topic suggest bans or limits on donations to parties. For example, Action Station’s Laura O’Connell Rapira argues for a cap of \$1000 per year being put on donations, and she suggests banning donations from certain industries that create “harm” – anyone who invests in, say, property, pornography, or banking could be disqualified from donating – see: [To build a new politics, we must break the grip of big money.](#)

O’Connell Rapira also champions greater use of a little-used mechanism for fundraising – the Protected Disclosure regime administered by the Electoral Commission: “Currently, the Electoral Act contains a mechanism for anyone wanting to donate to a political party and not wanting their identity disclosed. The clincher? If you want your donation to be anonymous to the public it also has to be anonymous to the party receiving the donation. How it works is that the Electoral Commission aggregates all of the donations and passes them on to parties. The Commission does not identify the dollar amount of individual donations, or the number or names of donors.”

In fact, this mechanism could be greatly expanded and even made compulsory, according to Liam Hehir, who has long-championed this as the best way to allow donations to occur but without donors being able to gain leverage with the politicians – see: [A step by step guide for compulsory anonymity in political donations.](#)

In his column, Hehir explains: “The basic concept is to funnel all political contributions through a process that makes it impossible for political parties to know who their donors are. The goal is to reconcile the privacy interests of donors with the legitimate right of the public to assurance their democracy is not for sale.”

Similarly, Andrea Vance has written that politicians simply can't be trusted to write the rules of fundraising or even to be part of the fundraising process: "As long as there are secret donations and opaque rules, there will be fundraising scandals. Politicians write the rules they so blatantly flout. The parties manage their own accounts and the cash that flows into them. Now it's pretty obvious they can't be trusted, it's time to take away that power and ban them from accepting donations directly. Is it time to change the laws to keep politicians in the dark over electoral donations?" – see: [Keep politicians in the dark over election donations.](#)

There are also calls to ban all donations and replace them with taxpayer-funded resources. That's essentially the argument of Cat MacLennan, who cites the use of state-funding in many other countries – see: [Time for state-funded political parties to replace donations.](#)

She does point out that hasn't necessarily fixed the problem elsewhere, and therefore additional controls on donations are also needed. Like others, MacLennan emphasises the need for large-scale reform that isn't stymied by politician self-interest: "MPs have made numerous changes to donation laws over the years, but their common characteristic has been that they have effectively amounted only to tinkering. They have failed utterly to address key concerns, or to prevent parties from doing their best to hide donors' identities."

A variation on the state funding proposal is made today by Elisha Watson, who outlines how "democracy dollars" could allow citizens to choose which parties to give taxpayer-funded vouchers to – see: [A novel way to fix our broken political donations system: flood the market.](#)

Watson is unimpressed with the other calls to regulate donations, using the "hydraulic theory of money" to point out that inevitably all such regulations fail, and money gets through in the same way that water eventually gets through the ground.

Here's her argument: "Any clever person seeking influence through money will simply redirect their dollars elsewhere to another point of influence that is currently unregulated – people will then grow outraged about this, new regulations flow, and then the dollars flow to the next influence point, and so on. One option is simply stop fighting – but instead of giving up, do exactly the opposite. Flood the market (in this case the market for political donations) with dollars so that even if rich people did make donations in search of influence, it wouldn't even matter because politicians would be swimming in a proverbial pool of money."

Former Labour MP Tim Barnett also points to democracy vouchers as a potential way forward, and cites their use in Seattle city elections last year in which voters were issued with \$25

vouchers to give to whatever candidate they wished – see: [Political party funding in New Zealand](#).

Barnett's analysis goes much further than this, and says the problem of money and politics requires "fresh thinking coming from outside the parties". He proposes six criteria for which to judge the current system, which mostly fails in his view. Overall, he argues, the political funding system here doesn't work well: "In short, we have ended up with the worst of both worlds – a system full of holes and inconsistencies where the risk of corruption is real, and a skewing towards resourcing the Parliamentary side of organised politics."

There is a school of thought that all the calls for reform are misplaced, given the various investigations by the Electoral Commission and the Serious Fraud Office shows the wheel of justice are in motion. This is essentially the argument of a recent editorial in The Listener, which says we simply need the political parties to obey the law – see: [A simple way to clean up the political donations mess](#).

Here's the magazine's main point: "Just because parties and individuals sometimes fall foul of electoral law does not automatically mean the law needs "reform", just as restaurants falling foul of hygiene regulations does not necessarily mean there is something wrong with the regulations. Improving compliance with electoral law should be political parties' first response to problems with handling donations. From the public perspective, seeing parties and individuals charged and/or investigated indicates that the law is working just fine. The area of donations feels messier than usual partly because of some good investigative reporting by RNZ into donations to the New Zealand First Foundation."

Finally, for the ultimate big picture discussion on why this all matters, see Andrew Geddis' [Money talks: Why the donations crisis goes to the heart of trust in our politics](#).



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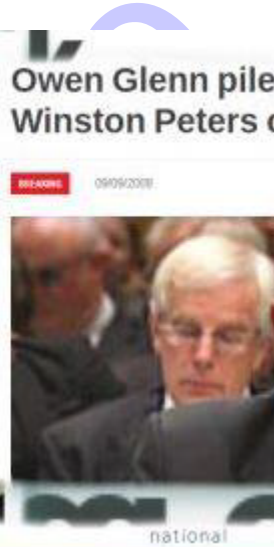
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3:42 PM PDT 5/7/2012 by Daniel Miller



Serious Fraud Office files criminal charges against four in National Party donation probe



Dine-and-dosh: 'Stunningly naive' date v controversial donor Donghua Liu

CHARLIE GATES AND HANNAH MARTIN 09:55, May 06, 2018



A brief history of New Zealand donations scandals



Max Rashbrooke | Guest writer
Commentary

We live, supposedly, in the most open era in New Zealand history. Yet right now scandal swirls around donations to National and New Zealand First. The other large party, Labour, also has form. As part of our [week-long series on electoral](#)

[funding, Money Talks](#), Max Rashbrooke asks: how has it come to this?

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The reason that donations to political parties matter so much, and are the subject of so much current debate, is simple: money talks. Or, at least, it can. Election campaigns cost a lot of cash to run, often in the millions of dollars. Communicating with voters outside of elections also costs money. So politicians need funders. If political parties rely on very large numbers of very small donations, none of those donations is likely to buy undue influence. But if parties, conversely, rely on very large donations from a very small number of people, the obvious danger is that those donations allow the giver an influence over politicians not open to the rest of us.



MONEY TALKS

The crisis in NZ political donations

Of course one has to be careful here. Unlike in other countries, where bags of cash clearly buy favours, it is rare that an individual New Zealand donation can be connected to a particular policy or decision. But it does happen. And the wider concern is that reliance on a small group of wealthy individuals, even if it does not influence one specific law, will still orient policy in their general direction.

And it is noteworthy that the two current national scandals concern alleged attempts to conceal the identity of donors, in the case of donations to National by pretending that the funds from one person came from several, and in New Zealand First's case by questionable use of a foundation to gain anonymity. (In both cases the alleged perpetrators deny wrongdoing.)

Like many stories, this one is partly old, partly new. The pace of the scandals appears to be accelerating, like a train running downhill and out of control. But the scandals themselves are hardly unique to this century.

What we know about donations to political parties is, of course, a function of how much scrutiny they receive – which until the 1980s was very little. [The 1956 Electoral Act](#), for instance, asked only candidates, not parties, to disclose their spending and donations – and in practice the donations disclosure was often dodged. So it is entirely possible that the old establishment subtly exerted undue influence over New Zealand political parties. Nonetheless, [the 1986 Royal Commission on the Electoral System](#) felt able to claim that the system “shows no sign of corruption ... and no excessive reliance by parties on a few special interest groups or institutions.”

But this rosy picture soon grew bleak. In 1987, as the pro-business fourth Labour government sought re-election, corporate donations poured into the party. Totalling [around \\$3 million](#), they represented a colossal sum at the time, far greater than donations from unions or members. Businessman Allan Hawkins openly acknowledged that he alone had given Labour \$250,000. (Hawkins has recently been in the news again after receiving his second jail sentence.) While a controversial 1990 *Frontline* documentary went far too far in implying that such donations directly bought favourable policies and discounted asset sales, there were certainly legitimate questions to be raised about such donations and the relative lack of any controls, or indeed transparency, around them.

These concerns also existed against a wider backdrop. Though sanguine about donations, the Royal Commission had noted the increasing cost and complexity of election campaigns. Meanwhile membership of political parties, which in all likelihood had been an important source of funds, was dwindling.

Since then, both trends have only intensified: the need for more cash, combined with having fewer members to tap, has led to greater reliance on wealthy individuals. “The thing that makes concerns about the donations model greater,” says Otago law professor Andrew Geddis, “is the fact that parties have to some extent been hollowed out. With the membership falling away, the question is, what goes in its place?” The increasing professionalisation of parties only exacerbates these issues. “Things that used to be done by volunteers, you are now hiring companies to do for you. So you need to have more money.”

Responding to such concerns, the 1993 Electoral Act required parties to disclose every donation over \$10,000 and the identity of its donor. (Anything under that threshold was the party’s business alone.) Although the law did not seek to curb how much could be given, it did enshrine a belief that the public had a right to know about large donations, in order to check whether they were leading to undue influence.

The threshold was, however, easily circumvented. Most famously, National used the Waitemata Trust, [described by the *Herald*](#) as “a secretive organisation which has showered [the party] in cash”, to channel hundreds of thousands of dollars in donations from figures who wished to remain anonymous. Labour also received significant sums from “undisclosed clients” channelled through law firms.

These concerns were addressed in the 2007 Electoral Finance Act, although the donation provisions were largely overshadowed by enormous controversy about the parts of the law that sought to restrict campaigning by third-party organisations. After National won office in 2008, the law was repealed, but a compromise between the major

parties largely preserved the restrictions on donations, including the crackdown on the anonymous channelling of large sums and the introduction of real-time reporting of the very largest ones.

What we have now is essentially a result of that compromise.

Parties do not have to declare donations worth less than \$1,500. They do have to report donations – but not the identities of their donors – that are worth between \$1,500 and \$15,000. Above \$15,000, they have to declare the donations *and* the identities of donors. And above \$30,000, they have to declare the donations and the identities of the donors *in real time* on the Electoral Commission website.



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None of the post-1993 reforms, however, has halted the growing pace of donations scandals. Any list of the scandals in this millennium alone would have to include the following:

- Late 2000s – Labour ministers lobby for, and approve, citizenship for Bill Liu, a donor, against the advice of officials
- 2008 – New Zealand First’s Winston Peters is censured by parliament for failing to declare a \$100,000 donation from Owen Glenn, following a firestorm of controversy
- 2010s – Both National and Labour develop schemes (named the Cabinet Club and the President’s Club, respectively) in which donors gain access to ministers
- 2014 – National minister Maurice Williamson loses his portfolios after intervening in the police investigation into party donor Donghua Liu
- 2018 – National MP Jami-Lee Ross alleges a \$100,000 donation to the party was split into a series of smaller donations to illegally avoid disclosure, sparking an investigation in which four people, including Ross himself, have now been charged by the Serious Fraud Office

- 2019 – Chinese citizen Lin Lang avoids curbs on donations by non-residents by (legally) routing a \$150,000 donation to National through a New Zealand-based firm, the Inner Mongolian Rider Horse Industry
- 2020 – The operation of the New Zealand First Foundation, which, as above, appears designed to avoid donor disclosure requirements, is now under investigation by the SFO.

(Meanwhile, at the local level, the SFO is also investigating donations to the Labour mayor of Christchurch, Lianne Dalziel, as well as Auckland Mayor Phil Goff's expenses.)

These scandals persist partly because nothing in the law curbs the amounts that can be given or – as a result – the potential for influence. At best, the law provides some transparency, and frequently it does not even do that. Because the threshold for disclosing a donor's identity is set as high as \$15,000, a donor can donate \$45,000 over a parliamentary term. And they can straightforwardly split, say, \$60,000 into four chunks of \$15,000, pass those chunks onto friends to donate on their behalf, and thus give a huge sum in complete secrecy. The fact that this is illegal does not mean it doesn't happen. Nor does it help that the supposed watchdog, the Electoral Commission, has to rely on parties' declarations and cannot meaningfully investigate their donation records.

Past reformers have contemplated fixing all these weaknesses, but have ultimately shrunk back from the task. In the light of the accelerating pace of scandals, that stance is increasingly untenable.

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NOVEMBER 19, 2020 Updated November 19, 2020

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IDEASROOM

How to drop big money from NZ politics

We have what could be a singular window of opportunity to crack down on political donations and strengthen our democracy, writes Simon Chapple

Money in politics has become a bit of a weeping sore in New Zealand public life. The problems have been confined to neither a single party nor a single part of the ideological spectrum.

In 2020 alone, New Zealand has had Serious Fraud Office (SFO) investigations into political donations to Labour Party-aligned mayors Lianne Dalziel and

Phil Goff, an SFO investigation of allegations the New Zealand First Foundation managed a slush fund for the Winston Peters-led party, and ex-National

MP Jami-Lee Ross up as one of four men facing criminal charges over two \$100,000 donations to the National Party that were allegedly split into smaller amounts to avoid public disclosure of the donor's identity.

We don't know what else has been going on that we don't see publicly, but a well-worn phrase about tips and icebergs probably comes to the mind of many in a cynical public.

That the public is indeed deeply distrustful about the funding of political parties, and has been so for some time, is starkly clear.

Trust surveys undertaken

by Te Herenga Waka—Victoria University of Wellington's Institute for Governance and Policy Studies (IGPS) between 2016 and 2020 indicate about 75 percent

of New Zealanders regularly report not much, or little or no trust in the way political parties are funded. Equally, our 2020 survey indicated only 6 percent

of New Zealanders had trust in political parties as an institution, little more than the 4 percent enjoyed (that might not quite be the right verb) by

bloggers and online commentators.

That's an important pillar of our democracy in clear major crisis.

The Panglossian line run by some (I've heard this from former politicians, for example) is that all these investigations into breaches of the Electoral

Act simply show the overall electoral law and its enforcement system is a well-oiled and effective machine and we should collectively pat ourselves on

our backs. But that's akin to drawing the conclusion a high number of murder investigations indicates it is wonderful we have a law against murder the

police so clearly enforce.

Some might also argue, compared with other jurisdictions, there is not much money involved in New Zealand politics. It is true that, for example, by the

standards of the recent United States elections, where at current exchange rates the extraordinary sum of about NZ\$20 billion was spent, the involvement

of money is much lower. To some degree, however, that merely means influence-peddling is just cheaper - there is a suggestion, for example, in the published

transcripts of Jami-Lee Ross's conversations with then-leader of the National Party, Simon Bridges, that a deft party donation of \$100,000 may generate

enough leverage to help vault a would-be MP into a decent list position in a major party.

And even if it is provisionally accepted for argument's sake that there is not much money involved in New Zealand politics, that it is not currently a

major problem and the public's considerable and ongoing systemic distrust can be discounted and ignored, it is clear the stable door is wide open, and

the money horse is free to bolt. Should that money horse bolt, it will be exceedingly difficult to corral, given the momentum and ability to warp democratic

processes possessed by well-heeled vested interests. Imagine, for example, how much harder it would be to rein down big money in US politics.

Following the general election, with the recently-signed Labour-Green cooperation deal containing a joint commitment to “building and maintaining public confidence in the integrity of Parliament and our democracy” and to consider the issue of electoral finance law, now is a golden opportunity for well-considered and informed efforts to change electoral law to minimise the impact of money on New Zealand representative politics.

We live in a representative democracy and hold to the overarching principle adult citizens and residents have an equal right to participate in that democracy.

Unequally distributed big dollars shouldn't have the right to tilt the democratic playing field. Consequently, we need to follow the Irish example and

put a low maximum cap on annual political party donations and place a low threshold for the public disclosure of the identity of donors. In addition, we should only allow individuals, not institutions like companies, trust or unions, to make donations, creating transparency about from who resources are arising.

The 2020 IGPS trust survey indicated fewer than 5 percent of New Zealanders considered themselves a member of a political party. By legislating big money out of politics via the low maximum donations cap, parties will be forced to shift their resource-raising activities from schmoozing the big prizes of

a few well-heeled donors - lots of money, raised from the few - to energetically engaging with many more ordinary New Zealand voters to obtain their mites of financial support - small amounts of money, from the many.

Expanding their membership bases would be an obvious strategy and also contribute to restoring trust in political parties as they became broader, more

representative institutions within the community. Equally, political party volunteers' time is a resource that is an obvious substitute for big money.

By eliminating the big donations, parties would be forced once again to work toward mass membership so they can access members' time as a resource to pursue political office. And time, after all, is a resource equally distributed across the community - we all have 24 hours a day.

The next three years are a wonderful and perhaps singular window of opportunity to get it right and strengthen our democracy.

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What will campaign finance reform in New Zealand look like?

Dec 2, 2020 | Politics & Society, Referee



By Alexander Campbell

In an election dominated by the response to COVID-19, a line in the Labour manifesto opened the door to campaign finance reform:

"Labour will continue to protect the integrity of New Zealand elections, and voters' access to the polls, including a review of financing rules."^[1]

Campaign finance reform also appeared in the new cooperation agreement between Labour and the Greens which states:

"...it is also the Government's intention to work with political parties from across Parliament (including the opposition) on issues that affect our democracy, including the Electoral Commission's 2012 recommended changes to MMP, electoral finance law, and the length of the Parliamentary term."^[2]

While the loose commitment got very little discussion in the media (one piece was written two weeks after the election),^[3] it is timely given the recent scandals. Last term saw investigations into New Zealand First, National, and Labour related to possible campaign finance violations. The former was accused of using the New Zealand First Foundation to prevent disclosure of donors' identities.^[4] Members of the National Party supposedly split donations to avoid disclosing a donor's identity^[5] while the Labour Party allegedly failed to disclose discounted rent as a donation,^[6] and used donated art to disguise donations.^[7] Nor are concerns limited to political parties: the recent referenda saw concern over the involvement of foreign groups in third-party campaigns.^[8]

These scandals are not a new trend. New Zealand has seen a string of incidents around campaign finance over the past 20 years,^[9] which some have connected

with the decline of political party mass membership and the ensuing move to increasing numbers of high value donors. [10] All this has left some arguing there is a need for a discussion on the current law and its enforcement.

To understand what reforms Labour's review might end up suggesting, it is necessary to discuss the issue implicit in campaign finance reform: whether money in politics is free speech or corruption. Modern politics is anything but cheap, and the place of money in politics has itself become a political issue. How campaign finance is regulated depends on how the line between political speech and corruption is drawn. This is a difficult line to draw, as highlighted by Labour's reforms in 2007. [11]

In theoretical terms, there are three basic arguments for stringent regulation of money in politics. The first is that money in politics should be restricted in order to prevent corruption and undue influence by a select few individuals on the political process. Research suggests that in the United States – a country with a lot of money in politics – law and policy are more responsive to wealthy interest groups than the median voter or mass membership interest groups. [12]

The second is that excessive money in politics means the right to participation loses much of its value if a few individuals with more money can dominate the political conversation. Along these lines, John Rawls proposed that the American constitution should protect equal rights to participation irrespective of social class. [13]

The third reason is that proper regulation of campaign finance protects the democratic legitimacy of the state. This is part of Rose-Ackerman's broader democratic legitimacy approach to corruption, which highlights corruption as endangering democratic ideals because it replaces meritocratic criteria with the criteria of willingness-to-pay. [14] While some may consider corruption to mean things such as petty bribes, legal corruption in the form of political control by wealth is far more concerning to those who agree with the democratic legitimacy approach to corruption.

Those who believe campaign finance should be loosely regulated argue that freedom of speech should be respected and afforded to all political speech, which includes political donations. [15] The Efficient Market Hypothesis line of reasoning argues that donations are part of the democratic obligations on politicians to be responsive to voters, and that ideas prove their worth by competition in the free market. [16] By this reasoning, large donations to gain access to candidates and parties are not corruption but democracy in action. Cases in the United States have argued that limits on money in politics and the idea of undue influence is unconstitutional. [17]

In New Zealand, similar arguments were against the 2007 reforms regarding restrictions placed on third party campaigners. Opponents of the 2007 reforms argued that the restrictions were contrary to freedom of expression and that the aims of the reforms were not sufficiently pressing to justify its heavy-handed approach. [18] Other arguments in New Zealand against further restrictions have pointed to the possible unintended consequences of further regulation. [19] These included the proliferation of litigation around electoral rules, the stifling effect costs of compliance will have on political actors, and the potential for the state to undesirably gain control over debate.

Before considering where Labour's review might take the law, it is also necessary to look at the development of the law until now. The 1956 Electoral Act enabled little scrutiny of donations, with only candidates (not parties) having to declare donations and spending. [20] However, advertising by interest groups was controlled during the election campaign period. The 1986 Royal Commission on the Electoral System found no corruption or excessive influence from certain groups. [21] However eventually it was decided there was a need for reform, given the increasing cost and professionalisation of campaigns and scandals around the Labour party regarding donations for the 1987 election. [22]

This reform brought us the 1993 Electoral Act. It required parties to disclose the identities of donors for donations over \$10,000.^[23] This threshold was circumvented with both Labour and National channelling donations through third parties to keep donors anonymous.^[24] The 2005 election had some of the most high-profile incidents around campaign finance. A report by the Auditor-General found most parties had improperly spent public funds,^[25] and there was controversy around campaigning by the Exclusive Brethren Church against Labour and the Greens.^[26] This led to Labour and its support partners controversially passing the Electoral Finance Act in 2007.

Arguments on the 2007 Electoral Finance Act neatly capture the broader debate about campaign finance. It placed significant restrictions on third party campaigns, requiring registration with the Electoral Commission for anyone spending more than \$12,000 campaigning for or against a political party or political position, or anyone spending more than \$1,000 campaigning for a candidate.^[27] All donations to a third-party campaign over \$5,000 had to be declared^[28] and there was a maximum expenditure of \$120,000.^[29] The Act also increased the length of the regulated period of campaigning to the beginning of the election year.^[30] Identities of donors contributing more than \$1,000 (in lump sum or aggregated form) had to be declared for parties and candidates.^[31] There was a limit of \$1,000 on donations from foreigners.^[32]

Most of the changes were overshadowed by controversy regarding the restrictions on third-party campaigns. Significant opposition was mobilised to argue that the reforms unjustifiably restricted freedom of speech. In 2009 the new National government repealed the Act,^[33] replacing it with one that incorporated weakened versions of the 2007 reforms. The regulated campaign period was shortened to three months.^[34] Third-party campaigns still had to register with the Electoral Commission but could spend more than double what they could under the 2007 Act.^[35] Parties must now declare the identity of donors for donations over \$15,000 in periodic returns, and within 10 days for donations over \$30,000.^[36] In 2019, foreign donations of over \$50 were also banned,^[37] but there remain no limits on donations from government contractors or a limit on total contributions to candidates or parties.

While in the previous term the Labour-led government made some changes to electoral legislation such as the ban on foreign donations, it remains unclear exactly what they want to achieve in their new review. The alleged violations by the political parties suggest there is need for reform of donation disclosure, but concerns were also raised regarding the participation of overseas third parties in referendum campaigns this election. Associate Professor Timothy Kuhner has noted the vulnerability of New Zealand to grand corruption issues.^[38] Labour's previous reform suggests they may want to deal with these issues and impose generally stricter rules, but they did also vote for the repeal of the 2007 Act in 2009.^[39] The first question ought to be who should be making the law. Waldron notes that the authority of laws comes from the "dignity" the legislative process confers,^[40] but it is unclear whether an issue with consequences of such a partisan nature should be dealt with by Parliament. Some have suggested that a citizens' assembly process, such as that used in British Columbia and Ontario, would be more appropriate.^[41] While this would solve the problem of self-interest, some have also questioned whether citizens assemblies are appropriate, given the New Zealand context of Te Tiriti o Waitangi.^[42] It is clear however from the 2007 reforms that consultation and a degree of consensus is a necessary ingredient for long-lasting change.

Bryce Edwards noted that a hands-off approach to regulation would sidestep this issue. The "civil society" approach would prioritise party and citizen autonomy and reduce regulation altogether.^[43] This would supposedly reduce the barriers to

political participation and allow voters to decide for themselves which parties are acting in a legitimate and respectable fashion. The obvious problem with this is that enforcement by vote would require high quality information to be presented to voters, requiring regulation and barriers, and for voters to actively inform themselves.

What substantive form a new law may take is also unclear. It could take a deregulation approach as above – making relatively minor changes akin to the 2007 reforms – or take a more radical approach. Minor changes would most likely take the form of stricter limits on the amounts of donations and the enforcement powers of the Electoral Commission. The Commission currently has limited powers, so reforms to enable it to force those it investigates to hand over information may be useful. More radical approaches tend to focus on making donations a more egalitarian process. A ‘democracy voucher’ system is one example. This would give each voter a voucher for a donation to a political party of their choice.^[44] This could be implemented alongside a ban on other donations, but regardless would certainly increase the ability of many to participate. However, it is not clear if this should be applied to third party campaigns also. It may also go some way to solving the problem mentioned earlier of the decline in party membership by encouraging participation beyond voting. This proposal is essentially a variation on complete state funding which others have proposed, the key issue normally being how state funding should be distributed. Currently parties are partially state funded through the broadcasting allocation and parliamentary services funding, but total state funding could create more issues around the control of the state on political discourse.^[45]

Clearly money in politics is complicated. The combination of partisan interest and the issue of freedom of speech means it will probably always be controversial. This article has not even begun to scratch the surface of the legal issues regarding what is speech and what the role of the state is in political discourse. However, it should be emphasised that something must be done if we want to change low levels of trust in politicians and the funding of politics.^[46]

Footnotes:

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Political Roundup: The Māori Party needs to come clean

How seriously does the Māori Party take issues of corruption and the untoward influence of big money in politics? Not very, based on how it's handling a political finance scandal in which three large donations were kept hidden from the public.

The party is currently making excuses, and largely failing to answer questions, about being referred to the Police for breaches of the Electoral Act for not declaring large donations it received during the election campaign, amounting to what could be corrupt practice.

The news of the Māori Party being referred to the Police is in Claire Trevett's news report yesterday, [**Election donations: Māori Party referred to police over \\$320,000 in undeclared donations.**](#)

As the article notes, "Under electoral laws, political parties must disclose donations of more than \$30,000 within 10 working days." This is so the public, especially during an election campaign, is aware of who is funding the politicians. In this case, the Māori Party decided not to declare, as the law requires, three very large donations, which amount to nearly a third of a million dollars.

The money donated comes from former party co-leader John Tamihere (\$158,224), Aotearoa Te Kahu Limited Partnership (\$120,000), and the National Urban Māori Authority (\$48,880).

It could be that the party didn't have the correct processes in place, in what is a complicated area of operating a political party. Although the law is clear about what needs to be declared, the details of what should be included is a difficult area, especially if the donations amount to an amalgamation of "in kind" contributions and election spending by candidates. As Trevett's article above reports, the party president "said Tamihere paid for some party costs out of his own pocket and the party had not realised it was supposed to treat those as donations."

Nonetheless, the ball is now in the Māori Party's court to reassure the public, and their voters, that they have integrity when it comes to powerful vested interests. Unfortunately, they aren't

providing a lot of the necessary detail.

About half of the money in question came from John Tamihere, who was less than forthcoming or contrite when replying to a journalist's question on why he hadn't been transparent, saying "Because I'm not as perfect as you" – see Tova O'Brien's **[Billy Te Kahika outs himself as second Electoral Commission referral to police over donations.](#)**

Party president Che Wilson is claiming ignorance and a shambolic state of affairs in the party as his excuse – see RNZ's **[Māori Party undeclared donations referred to police.](#)** Wilson is quoted saying, "We took over a party that had broken down and as part of the rebuild as volunteers when we got into the thick of the campaign we misinterpreted how we had to report things".

Similarly, talking to Newshub, Wilson conveys that "they were so focused on issues that needed solving in the lead-up to the election that meant they didn't have the correct processes" – see Rachel Sadler's **[Māori Party undeclared donations: Electoral Commission notified as soon as error was noticed – party president Che Wilson.](#)**

Evaluating the party's responses so far, electoral law expert Andrew Geddis told RNZ's Morning Report: "That doesn't strike me particularly as a good excuse, given that these rules are in place for a good reason. And if you as party secretary are taking on the responsibility then its implicit on you to make sure you know what you are doing and that you've got the processes in place to be able to meet the legal requirements" – see: **[Rules around electoral donations very clear – Geddis.](#)**

Geddis appears to believe a prosecution is required in this case, because "There's no point having these rules if people can just ignore them and just walk away with a slap on the hand with a wet bus ticket." But he adds that a judge might choose a lesser punishment for the party president if there are mitigating circumstances (such as the fact that they have come clean to the Electoral Commission).

Former Labour Party president Mike Williams has spoken out today, saying there's "no excuse" for failing to disclose the large donations, and the "law is perfectly clear" – see Waatea News' **[Māori Party fails to report funding.](#)** According to this article, "Williams says John Tamihere, who is a former MP, would know the rules".

What's more, Williams argues that the Māori Party's failure to disclose its funding during the election campaign may have been politically consequential: "It might have altered votes if people knew John Tamihere chucked in \$158,00 before the election. That should have been reported before the election. That's the point of the law".

Questions raised about who pulls the strings in the Māori Party

The spotlight is now on the three big donors to the Māori Party. On Newshub's Hui TV programme last night, Mihingarangi Forbes challenged the party president about the funding from the National Urban Māori Authority (NUMA), which John Tamihere is the CEO of, and is contracted to the government to provide Whānau Ora services. But Wilson refused to comment saying "We can only talk about what we've done and you'd need to talk to NUMA about that."

Political commentators Shane te Pou and Tau Henare appeared on the programme, and had very different interpretations of this donation. Te Pou, a former Labour candidate, said: "I think it's very important the police investigate. If Whanau Ora money has been used – and I use that word 'if' – I don't think that's a good thing at all. At the end of the day it's taxpayer money... If I was the minister of Whanau Ora, the first thing in the morning I would write to the Auditor-General and I would ask him to investigate" – see Dan Satherley's **'That's the game':**

Māori Party MPs warned attacks will come over donations scandal.

In contrast, Tau Henare called the scandal a "storm in a teacup", and argued that the problem is with the law rather than the Māori Party: "The reality is we have a law that's designed to obfuscate, designed to... hide things... The law needs to be looked at, the law needs to be revamped so everybody is clear about their accountabilities. In terms of the Māori Party, I think it's a bit of a rookie mistake."

Rightwing blogger David Farrar argues today that the matter raises important questions about the Māori Party's funding – especially from the mysterious entity, Aotearoa Te Kahu, which gave a single donation of \$120,000 – see: **Who are the mystery Māori Party funders?**.

Farrar has been digging around to find the background of this donor: "Go to the register of limited partnerships and you find they act on behalf of Aotearoa Te Kahu GP Limited. Their shareholder is ATK Nominees Limited. And their shareholder is Morrison Kent Limited. It is fair to assume Morrison Kent are not the actual shareholders but are acting for someone. So this leaves the question who actually controls and funds Aotearoa Te Kahu and made the decision to donate \$120,000 to the Māori Party?"

Has the Māori Party been a victim of racism?

At the same time that the Māori Party were referred to the Police, the Electoral Commission also said that the National Party had breached the rules by failing to disclose \$35,000 donated last year in three instalments by real estate businessman Garth Barfoot. Che Wilson has suggested, in his interview with Newshub, that because National hasn't been referred to the Police, it's a case of the Māori Party being unfairly singled out: "That's just really sad that the system has its bias and potentially is racist".

However, the Electoral Commission has been reported as saying that the same rules are being applied, but it hasn't yet decided whether to also refer National to the police. In her article, Claire Trevett states: "The Electoral Commission said it had asked for an explanation from the National Party and was still assessing the matter. It did not automatically refer all late donations to the police, but considered issues such as the party's past record and the timeframes involved."

Blogger No Right Turn has backed up the Māori Party on this, suggesting if the Police choose to prosecute, this will reflect discrimination on their part: "In the past the police (as opposed to the SFO) have generally refused to enforce the law (it's not 'real' crime, you see, unlike someone smoking a joint or walking while brown). But given the party involved and the police's culture of racism and subservience to power, maybe we might finally see the law enforced this time, though for entirely the wrong reasons" – see: [**The Māori Party's hidden donations.**](#)

Finally, the Electoral Commission is yet to release the details of the donations received by parties for the 2020 election year, but in February the donations to individual election candidates were published – you can see the details in Claire Trevett's, [**Shane Jones, Christopher Luxon, Anna Lorck – who got the most donations in 2020 election?**](#)



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Political Roundup: Cash for access to politicians continues

Should anyone have trust in politicians, given the manner in which they solicit money from the wealthy? Probably not, since virtually every party in Parliament in recent times has been found to be involved in flaunting the law or accepting dodgy donations from the rich. News reports of questionable donations and fundraising have been building up over recent years, and this year it only seems to be escalating.

This week it's the Labour Government in the spotlight – with revelations that they are continuing to use the fundraising mechanism of the last National Government, whereby the Prime Minister and other senior ministers are advertised to wealthy businesspeople as available for an audience in exchange for cash. This “cash for access” scheme was named the “Cabinet Club” by National, but the Labour Government gives it the name “Labour Party Business Conference” – see Derek Cheng’s [Labour's \\$1795 'business' conference – How much should it cost to chat to Jacinda Ardern and senior ministers?](#).

This all-day fundraising meeting for businesspeople will take place on 30 July in Auckland. The invitation sent out by Labour Party president Claire Szabo promises “interactive sessions” with the top ministers and PM to discuss policies, finishing with “networking drinks” – all for the price of \$2064 (including GST).

Labour's coalition partner the Greens have criticised the fundraising, with Justice spokesperson Golriz Ghahraman alleging that these donations are about privileged access to decisionmakers, pointing out that only the wealthy can gain the ear of the Government ministers. She wants the rules on this kind of fundraising changed: “We keep having these things be revealed to the public, and find that the public is shocked and horrified that these things can happen within the

rules". Furthermore, she complains, "It's all within the rules, so it's really time to change the rules, even though politicians have a vested interest in the rules remaining."

Labour Party general secretary Rob Salmond is reported justifying the cash for access scheme on the basis that other parties do it: "For many years political parties have hosted events which their MPs attend, and sold tickets to those events. There's nothing new in that." However, previously Salmond has been highly critical of National doing the same thing. For example, in 2014 when his opponents denied that Cabinet Clubs were a conflict of interest or a problem, lampooned their denials: "Cabinet Clubs are not clubs, just as high-class prostitutes are not prostitutes, and conflicts of interest are not interests."

This latest dodgy donations scandal was first reported yesterday by Richard Harman, who explains "Labour has obviously carefully designed this so that it falls within Electoral law and also the requirements of the Cabinet Manual" – see: [\\$1795 to meet a Labour Cabinet Minister \(paywalled\)](#). He points out that in terms of selling access to the decisionmakers, "The invitation did not refer to their Ministerial titles but instead described them as 'spokesperson' for their relevant portfolios."

A history of selling access to Cabinet ministers

The Labour Party is quite right to say that their business club fundraising is nothing new. The National Government was infamous for setting up its Cabinet Club under John Key's prime ministership, in which people could pay \$1000-plus to chat to senior ministers. I covered this in 2014, in a column, [Is there 'cash for access' in NZ politics?](#).

In this I drew attention to Labour's use of the term "corruption" in relation to National's fundraising. MP Louisa Wall wrote a piece condemning the practice, saying "This is clearly payment for access and if the price is right a deal can be done" – see: [When does corruption start damaging National?](#).

Once Labour got into power, however, it was quick to emulate National's techniques. In 2017 Labour launched its exclusive "President's Club", which gave wealthy businesspeople a chance to purchase dinner opportunities with Cabinet ministers.

Then in 2018 the Minister of Finance started inviting businesspeople, corporate lobbyists and other wealthy individuals to meet with him in exclusive venues for dinner, where he would speak, signal future policy announcements, and go from table to table for more intimate discussions with donors – see my roundup at the time: [Questions over Grant Robertson's](#)

'cash for access' fundraising.

Other recent revelations about donations

According to Richard Harman, writing about Labour's latest corporate fundraising, the political parties are trying to find new sources of cash, especially after the Serious Fraud Office clamped down on some of their donors: "Both Labour and National are under pressure now to find new sources of funding with their previously lucrative China funding pipelines effectively closed down by the Serious Fraud Office, which has charges before the courts relating to both parties' acceptance of funding from Chinese sources."

Newsroom writer Pete McKenzie has uncovered some other interesting donations involving various parties. Perhaps the most interesting is the donation accepted by the Green Party from someone prosecuted for abuse of animals. McKenzie explains that one of the party's biggest donors was convicted in 2020 for her severe neglect of animals, but despite her donation being processed by the Greens' ethics committee the money was accepted, and the party still refuse to return the money – see: [Greens won't be returning \\$54k donations from animal abuser.](#)

The Greens claim they were unaware of the abuse, but McKenzie says a quick search online uncovered "her history of neglect". And the party argue that the law means the money can't be donated to another organisation such as the SPCA.

Blogger No Right Turn is aghast at the party's stance on this, asking: [How much is the Greens' reputation worth?](#). He argues the case of animal neglect "was fairly high-profile", and he says "I'm surprised that no-one in the party noticed."

The blogger argues the party has the ability to return the donation but is choosing not to, which means the Greens are complicit: "if they refuse to do so, knowing the crimes the donor committed, their supporters are perfectly entitled to conclude that they support those crimes, or are at least willing to turn a blind eye to them for money. And I doubt many of them would find that acceptable."

McKenzie has uncovered another dodgy donation accepted by a Labour MP, who has now returned the money – see: [Minister returns donation from Christchurch attack conspiracy theorist.](#) Here are the basic details: "Phil Twyford has returned a \$2,000 donation after Newsroom found that it came from a man who claimed the Christchurch terror attacks were part of a Jewish conspiracy."

Another Cabinet Minister, Stuart Nash, has received large donations from businesspeople in industries that he oversees. According to McKenzie, “Nash raked in nearly \$50,000 in big money donations for last year’s election – including at least \$25,500 from people who could benefit from decisions he makes as the new minister in charge of forestry and regional development” – see: [Donations create conflict issue for Stuart Nash’s forestry portfolio.](#)

This article quotes researcher Max Rashbrooke arguing that it is “concerning if a minister is accepting or has accepted donations from an industry which he is supposed to be regulating”, and he is “calling on Nash to return the money”. In response, a spokesperson for Nash says the Cabinet Office has cleared Nash’s situation, but McKenzie says the “spokesperson did not respond to questions regarding which interests and potential conflicts the minister disclosed”, and nor did they “respond to questions regarding whether he would recuse himself from any ministerial decisions specifically involving individuals and companies who have donated to his campaigns.”

McKenzie has written another piece for Newsroom in which he focuses on the National Party’s recent fundraising technique whereby the head office appears to collect money on behalf of local election candidates, and then donates the money to an individual’s campaign – see: [Politics rife with ‘dark money’.](#) The speculation is that this is a technique to get around the laws requiring donors to be publicly disclosed as donating to that candidate.

National has responded and is quoted in the article, saying: “Whilst it is easy to hypothesise, allege, and pontificate on the nefarious intent of some in politics, and use that falsehood as an angle to smear other political parties, in the case of the National Party it is frankly just inaccurate and wrong.”

The article also examines the Labour Party’s use of artwork auctions, in which prominent artists donate artwork which is sold to Labour supporters, effectively as an undeclared donation.

McKenzie has also summarised his own conclusions about his series of Newsroom articles, writing for the Guardian, concluding that [New Zealand’s campaign finance laws are broken. That can have enormous consequences.](#) He argues, “An increased appetite for political donations strengthens the political influence of the wealthiest New Zealanders”.

The SFO investigations

Last month the Serious Fraud Office (SFO) announced it was prosecuting six individuals in relation to donations to the Labour Party. This comes on top of an upcoming trial relating to

National Party donations. New Zealand First is also being investigated by the SFO, and Te Paati Māori has been referred for investigation by the Police.

When the Labour prosecution case was announced, Jacinda Ardern responded to say: “This isn’t a good environment for anyone, for no political party, but nor for New Zealanders, they want to have confidence in the system so let’s look at the law.”

That’s “a cop-out” according to RNZ political editor Jane Patterson, who says the “latest charges to be laid by the Serious Fraud Office are a reflection on the players, not the system” – see: [SFO charges an indictment on political parties - not the system](#). She complains that “It’s a default position of political parties to call for a review of the rules when trouble arises.”

Patterson rails against politicians who suggest the problem is with the rules and perhaps with the ability of the politicians and donors to easily abide by these. She suggests the pattern of rule violation makes it clear that those who do so have “a good understanding and knowledge of the rules, rather than offences being committed in ignorance.”

Patterson concludes: “All of this erodes public trust. To have cases linked to National, Labour and New Zealand First, either before the courts or heading for them, is an indictment on the politicians and those parties, not the system.”

Similarly, the Herald’s Audrey Young has described Ardern’s response to the Labour-related SFO charges as being “knee-jerk”, and points out that “Ardern resisted calling for a look at the law when charges were laid in relation to National and New Zealand First donations. That suggestion arose only after charges were laid in relation to Labour” – see: [Jacinda Ardern's knee-jerk reaction to SFO charges \(paywalled\)](#).

Young says Ardern’s attempt to blame “the system” is misplaced when in fact the “law is clear” and is finally working – in bringing charges against those who are allegedly violating the rules. She celebrates that after years of complaints about dodgy donation going nowhere, finally “the system” is prosecuting, and therefore New Zealanders can “have confidence that the system might actually be working”. She therefore advises against the politicians immediately undertaking yet another overhaul of donations law: “The law has been refined many times. Now it is time for it to be tested before the courts.”

Finally, for details on how well the parties did out of donations in 2020, see the report on the official figures disclosed last month – see Michael Neilson, Claire Trevett and Jason Walls’ [National received nearly \\$3m in political donations in 2020 – nearly double Labour](#).



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POLITICS

Donations create conflict issue for Stuart Nash's forestry portfolio
Labour Party MP Stuart Nash raked in nearly \$50,000 in big money donations for last year's election – including at least \$25,500 from people who could

benefit from decisions he makes as the new minister in charge of forestry and regional development.

Max Rashbrooke, a leading scholar on wealth and democracy at Victoria University of Wellington, believes the donations are “concerning” and “inappropriate”, and is calling on Nash to return the money.

“He could have taken those donations in good faith,” Rashbrooke said. “But if you then become minister for the industry from which those donations come, then I think there's an argument that the appropriate thing to do would be to return those donations.”

A spokesperson for Nash said that after the election the Cabinet minister “met with the Cabinet Office to discuss a range of interests and the management

of any possible areas of conflict. The minister continues to ensure that no conflict exists or appears to exist between his personal interests and his

portfolio responsibilities, in accordance with the guidance in the Cabinet Manual.” The spokesperson did not respond to questions regarding which interests

and potential conflicts the minister disclosed.

Nash's acceptance and disclosure of the donations appear to comply with Aotearoa's laws around campaign finance, but critics like Rashbrooke say it is

nonetheless ethically worrying. He argued it was “concerning if a minister is accepting or has accepted donations from an industry which he is supposed

to be regulating. Quite apart from anything else, there's the standard principle that justice must not only be done but be seen to be done".

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* **Politics rife with 'dark money'**

* **Greens won't return \$54k from animal abuser**

Simon Chapple has researched political donations in his role as director of the Institute for Governance and Policy Studies – a Wellington thinktank. According

to him, "It's a matter of moral judgment. [Nash] should face some very strong questioning ... If I was in Nash's position, I would not have taken the money."

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\$9503.80 from Tenon, a Taupo-based timber company; and \$5000 from Red Stag, a Rotorua-based timber processing company.

Nash has a long association with Kelly, who also donated \$5000 for Nash's 2017 campaign and \$31,000 for his 2014 re-election. Kelly was one of two businessmen

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as backing from a friend who "believed in what I was doing".
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Nash has described becoming Forestry Minister as "a long-held ambition". His spokesperson noted that "Minister Nash has an extensive network of contacts

in the forestry sector since first graduating from the University of Canterbury with a forestry qualification in 1993. He ... has worked in the forestry

sector in NZ and overseas at various points in his career".

In his ministerial role, Nash now oversees Te Uru Rākau – the New Zealand Forestry Service. According to Te Uru Rākau's 'Future of Forestry' report, over

the coming years it will focus on the expansion of tree planting to meet Aotearoa's climate goals, the provision of various forms of support to the timber industry, and developing commercial joint ventures between Crown Forestry and timber businesses. Through these activities, Te Uru Rākau will be interacting and negotiating with private timber companies like LumberLink, Tenon and Red Stag.

More broadly, Nash is Cabinet's subject matter expert on forestry and regional development and will have influence over its decisions on policy and regulatory issues in these areas.

Nash also received \$6500 from Shah Aslam, the chief executive and owner of Air Napier. The address disclosed by Aslam for his donation matches that of another of his businesses – the Wellington restaurant Mama Brown. Among its range of services, Air Napier provides passenger services to Hawkes Bay and 'event packages' which include wine tastings, shopping trips and golf outings.

The Government recently unveiled a \$200 million 'Regional Strategic Partnership Fund' (a reformed version of last term's Provincial Growth Fund). Nash will be one of a small team of ministers assessing funding applications of up to \$20 million from the private and public sector in regional Aotearoa. His spokesperson insisted that "every project that will be considered for investment through the new Regional Strategic Partnership Fund will be subject to high levels of scrutiny before it reaches ministers". The spokesperson did not respond to questions regarding whether he would recuse himself from any ministerial decisions specifically involving individuals and companies who have donated to his campaigns.

The great-grandson of Walter Nash – a Labour politician who served as Aotearoa's 27th Prime Minister – Nash has long been an influential figure within the party. A stalwart of Labour's centrist wing, he served as the party's spokesman on forestry and revenue under then-leader Phil Goff, as chief-of-staff

to then-leader David Shearer, and has held senior ministerial roles since Labour's election to government in 2017.

Nash is one of Parliament's most effective fundraisers. His haul of almost \$50,000 in large donations gave him one of Parliament's largest war chests in

the 2020 election. In 2017 and 2014 he received \$27,500 and \$99,000 respectively in large donations, mainly from property and equity investors like Sir

Robert Jones and Caniwi Capital Management.

While he accepted there were many innocent reasons to make or accept donations, Rashbrooke noted: "These are big sums of money in the New Zealand context.

They're big enough to buy influence because they're big enough to fund significant chunks of what political parties do."

Given Nash's influence as a minister and senior party figure, Rashbrooke was emphatic about the potential consequences of Nash retaining donations from

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Proactive Release

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JUNE 9, 2021 Updated 2 hours ago

Pete McKenzie

Pete McKenzie

Pete McKenzie is a freelance journalist focused on politics, foreign affairs & defence and social affairs. He studies Law and Mandarin at Te Herenga Waka—Victoria University of Wellington.

POLITICS

Donations create conflict issue for Stuart Nash's forestry portfolio
Labour Party MP Stuart Nash raked in nearly \$50,000 in big money donations for last year's election – including at least \$25,500 from people who could

benefit from decisions he makes as the new minister in charge of forestry and regional development.

Max Rashbrooke, a leading scholar on wealth and democracy at Victoria University of Wellington, believes the donations are “concerning” and “inappropriate”, and is calling on Nash to return the money.

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A Newsroom analysis of donation returns filed with the Electoral Commission for the 2020 election by parliamentary political parties and their MPs has revealed that our major parties appear to commonly employ tactics that hide the identity of Kiwis donating hundreds of thousands of dollars. Photo: Lynn Grieveson figure end

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JUNE 3, 2021 Updated June 5, 2021

Pete McKenzie

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Pete McKenzie is a freelance journalist focused on politics, foreign affairs & defence and social affairs. He studies Law and Mandarin at Te Herenga Waka—Victoria University of Wellington.

WEEK IN REVIEW

Pete McKenzie: Politics rife with ‘dark money’

In the first of four articles examining political donations in New Zealand, Pete McKenzie reports that leading academics are concerned our major political parties are using ‘barely legal’ tactics to hide the source of large sums of money.

In May, news broke that donors to the Labour Party were being prosecuted by the Serious Fraud Office over breaches of campaign finance laws. Remarkably,

four of the six parties that have recently held seats in Parliament are now involved in investigations or prosecutions by the SFO for such breaches – Labour, National, Te Paati Māori and NZ First.

But with all the attention on violations of our campaign finance laws, little attention has been paid to the more chronic problem of parties circumventing

those laws through lawful but potentially problematic methods – a trend which leading academics and observers decry as “very problematic”.

A Newsroom analysis of donation returns filed with the Electoral Commission for the 2020 election by parliamentary political parties and their MPs has

revealed that our major parties appear to commonly employ tactics that hide the identity of Kiwis donating hundreds of thousands of dollars.

This is apparent from the returns of National candidates who became MPs. While the donation returns for candidates from other parliamentary parties typically show a mix of donations from individuals, businesses and party supporters, returns for National MPs were almost universally limited to donations from the local or central National Party. It is on that basis that Professor Andrew Geddis, a University of Otago academic and New Zealand's foremost expert on campaign finance laws, believes that "the National Party [may be] arbitraging those different disclosure thresholds to avoid having to list all the people who are actually giving money to help the local candidates."

block quote

"I know for a fact that there are National MPs who are not declaring any donations except those channelled from head office, [but] who are nonetheless organising fundraising events."

- Max Rashbrooke

block quote end

Ben Thomas, a public relations consultant and former National staffer, agrees that the reasonable assumption is that "it's a way of avoiding naming donors".

And according to Max Rashbrooke, an expert on democracy and wealth inequality at Victoria University of Wellington, "It's very problematic, because it's obviously concealing the source of donations".

If these experts' diagnosis is correct, National would be circumventing the different disclosure thresholds for donations to individuals and parties. All

donations over \$1500 to individual candidates must be publicly disclosed; for parties, only those over \$15,000 must be publicly disclosed. By channeling

their donations through the party with the expectation that they will be routed to their favoured candidates, privacy-keen donors could contribute almost

ten times as much to individual candidates without having their names publicly disclosed.

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While it is difficult to be certain given parties' tendency towards privacy in this area, Rashbrooke is fairly confident about his diagnosis. "You can't tell me that all those politicians are incapable of fundraising directly themselves. We know that politicians across the board can get donations in the thousands and tens of thousands from constituents. It's totally implausible that those candidates – many of whom are very well resourced, well connected, highly thought of politicians – are unable to get their own funding."

Election year party donations and loans (2020)

National Party

\$2,802,766

- Estate of Gayle Pike

\$50,000

- Christopher and Banks Ltd

\$50,000

- DHC Trust

\$50,000

Labour Party

\$1,510,628

- Dairy Workers Union

\$90,000

- Hon Robert Smellie QC

\$82,500

- Mark James Todd

\$50,000

ACT New Zealand

\$1,227,121

- Dame Jenny Gibbs

\$100,700

- Christopher Reeve

\$70,000

Green Party

\$859,727

- Peter Kraus

\$50,000

- Phillip Mills

\$45,000

NZ First

\$694,450

- WR Peters (loan)

\$180,187

Māori Party

\$389,604

- John Tamihere

\$158,224

- Aotearoa Te Kahu

\$120,000

ONE Party

\$340,018

- Bruce William Black

\$205,000

Advance NZ

\$251,099

- NZ Public Party

\$65,633

Only a small proportion of the bigger parties' funding comes from disclosed donors. Instead, major parties hide the identities of candidates' donors under higher party disclosure caps.

Chart: Newsroom Pro

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Source:

Electoral Commission

•Get the data: Election year party donations and loans (2020)

•

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One example may be Christopher Luxon, the high-profile first-term National MP and former CEO of Air New Zealand. Running in the safe National seat of Botany, Luxon ultimately won his electorate with a majority of 4771 votes despite Labour's red wave in 2020 – indicating he was likely never at risk of losing.

Yet he received \$73,050 from his local party committee: \$30,000 more than any other National MP received from a single source and almost \$45,000 more than he could lawfully spend in a single election. He disclosed no other donations, despite his strong ties to Aotearoa's business community. Luxon did not respond to requests for comment.

A spokesperson for the National Party stated that its MPs' limited donation disclosure was the result of the party's focus on grassroots local electorate committees, which "work hard locally, and have done so for decades, to build strong networks and relationships to engage our members and supporters to raise funds continuously". The spokesperson argued that by channeling donations and community fundraising through local committees, the party was able to support candidates selected at short notice or with less personal wealth or extensive networks.

block quote

"If you use a lame cliché like the Overton Window, then maybe putting in place those [donor] relationships changes your idea of what's possible or desirable in policy areas which are relevant."

– Ben Thomas

block quote end

"Whilst it is easy to hypothesise, allege, and pontificate on the nefarious intent of some in politics, and use that falsehood as an angle to smear other political parties, in the case of the National Party it is frankly just inaccurate and wrong."

The statement did not, however, directly address Geddis and Rashbrooke's concern that channeling donations through local electorate committees to individual

candidates hides the original source of the money. Neither did the statement address Rashbrooke's concern about MPs who received seemingly disproportionate sums from the central party.

"I know for a fact that there are National MPs who are not declaring any donations except those channelled from head office, [but] who are nonetheless organising fundraising events," Rashbrooke said. "And so what they may be doing is organising a fundraising event which is very clearly aimed at helping their own electorate campaign, but which is done in a fashion where the donations technically go to the National Party head office ... what that means is that donations which, had they been given directly to the candidate we would know who was behind them, would become completely anonymous."

The Electoral Commission is responsible for administering campaign finance rules. When asked for comment, it noted that, "Parties can run fundraisers out in the electorates. The rules also allow parties to give donations to their candidates." However it emphasised that, "Candidates can receive party donations that must be transmitted to the party secretary. A party secretary or other party official can receive candidate donations that must be transmitted to the candidate. Whether or not a donation is a party donation or candidate donation depends on the actions, intentions and expectations of the donor, the context in which it is given, and whether the donor indicates they are giving to the party or the candidate."

National is not the only party which may be hiding the source of its donations in ways that could undermine the spirit of our campaign finance laws. Among

the donors listed on the Labour Party's donation return are the names of some of Aotearoa's most prominent artists: Karl Maughan, Dick Frizzell, Bill Hammond, Neil Dawson, Ann Robinson, Michael Hight and John Reynolds. Together they are responsible for \$184,140 in contributions to Labour.

Ben Thomas explains that some of these artists may be part of a longstanding scheme by which artworks are auctioned off to Labour donors: the donation is listed under the artist's name, but they contribute little to none of the money. Instead, the donors who buy these artworks are the real source of the money which ends up in Labour's bank accounts.

Rob Salmond, General Secretary of the Labour Party, insisted that, "Labour has received advice that our art auctions operate within both the letter and the spirit of New Zealand's donation laws. This is a well-established practice that takes place in an open, transparent manner."

But, according to Geddis, such insistence is "a little bit cute, because trying to put a value on a piece of art is very subjective – is this really worth

the amount it's sold for, or are they paying above the odds to support the party they like? And then the second problem is, from the perspective of an ordinary person, you really want to know who's actually given money to the party. It's the money the party really wants, so you want to know the identity of the money."

The flood of dark money to major parties may be having significant impacts on political behaviour in Aotearoa. While neither Thomas or Rashbrooke believe

there is an explicitly transactional relationship (where money purchases policy changes) between donors and most politicians, both believe it affects politicians'

understanding of what is politically desirable or possible. "If you use a lame cliché like the Overton Window," says Thomas, "then maybe putting in place

those [donor] relationships changes your idea of what's possible or desirable in policy areas which are relevant."

"These are big sums of money in the New Zealand context. They're big enough to buy influence because they're big enough to fund significant chunks of what

political parties do," explains Rashbrooke. "It's an expensive business, running a political party. And that creates a reliance on the people who fund these expensive enterprises."

Rashbrooke is emphatic that these loopholes need to be addressed. “I think that is pretty clearly circumventing the rules, and I think that – along with a lot of other things about New Zealand’s political donation regulations – it is something which needs to be looked at. There needs to be a way of preventing it from happening.”

Part two of Pete McKenzie's series on political donations will be running next Tuesday.

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Andrew Riddell

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4 June 2021

The 2017 election spending returns show the same pattern of large donations from National Party Central to candidates, including, IIRC, C Bishop and J Collins.

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Proactive Release

NOTE: The fishing industry has a long history of using its money and influence to get the Government decisions it wants and when Stuart Nash was Minister, cameras on fishing boats and restrictions on fishing were delayed.

Stuart Nash received \$51,000 in donations from Troy Bowker. The minister has a longstanding relationship with the contentious investment banker, who donated to three of his election campaigns and helped him look into establishing a new centrist party to compete with Labour and National.

Stuart Nash, Minister of Regional and Economic Development, received at least \$51,000 in direct and indirect donations from Troy Bowker, the controversial investment banker who recently accused animation entrepreneur Sir Ian Taylor of “sucking up to the left Māori-loving agenda”. In a response to a LinkedIn comment by Taylor celebrating New Zealand’s Pacific heritage, Bowker said: “Another example of European NZers not being proud of their own ancestors ... FFS. Wake up NZ.”

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Nash is a senior Labour Party politician who represents the Napier electorate and also holds the Tourism and Small Business ministerial portfolios. In a statement, he said: “Like others, I find the comments appalling and insulting. Sir Ian Taylor is an eminent New Zealander and deserves more respect for his innovative contributions to Kiwi business and cultural life. I have not spoken to Mr Bowker about his comments. The last donation to the Napier campaign was made more than 14 months ago and was applied to campaign costs at the time.”

Nash’s statement did not address questions from Newsroom about whether he would be returning or donating Bowker’s money.

However Prime Minister Jacinda

Ardern – who called Bowker’s statement “astonishing and appalling” – said that Nash “has made it clear to me that no donations will be received from Mr

Bowker in the future”.

Bowker and Nash have a longstanding political relationship. According to donation records filed with the Electoral Commission, Nash received a total of \$51,000 from Bowker over the 2014, 2017 and 2020 elections – either directly or through Bowker’s investment company Caniwi Capital. Bowker also helped

fund

a 2014 report examining the possibility of establishing a new centrist party, led by Nash, to compete with National and Labour. Nash has repeatedly described

Bowker as a “mate”.

Bowker – who is also a part-owner and board member of the Hurricanes – has been widely condemned for his comments. The Hurricanes have distanced themselves from Bowker and said they cannot control his comments. Hurricanes star TJ Perenara said

Bowker’s comments were “insulting” and showed “underlying racism”. NZ Rugby chief executive Mark Robinson said, “The comments made by Troy Bowker are not supported by New Zealand Rugby in any way”.

A number of Nash’s parliamentary colleagues have also criticised

Bowker’s comments, including Speaker of the House Trevor Mallard and Deputy Prime Minister Grant Robertson. Mallard compared Bowker to rugby administrators during the Springbok tour. “Bowker is doing the sort of damage ignorant rugby administrations did 40 years ago. We made tremendous progress in race relations and rugby is a very big part of that. What he has done, has undone it.” He vowed to boycott Hurricanes matches until Bowker resigned his stake in the organisation.

Robertson has said Bowker’s comments are “appalling” and is also considering boycotting the Hurricanes as a result.

In response to a request for comment, Mallard emphasised his comments were personal and in the context of his past support for the Hurricanes. He said,

“It is not my role to comment on MPs’ sources of donations and I think that would conflict with my role as Speaker.”

Robertson said he stood by his comments, but did not respond to questions about whether he thought Nash should retain Bowker’s money.

Bowker has since doubled down on his comments, and said

to Stuff that, “The calls from the political left for my ‘resignation’ mean absolutely nothing since I am not actually employed by anyone. I own my own

business and have a vast array of investments. I am actually a shareholder and my director position is part of my ownership rights.” He has since either

taken down or made his LinkedIn account private, and attempts to access the website of his business Caniwi Capital lead to error messages.

Bowker’s donation to Nash is the latest in a series of controversial donations across the political spectrum in recent years. Newsroom recently found

that Nash had accepted tens of thousands of dollars from prominent figures in the forestry industry, which he helps regulate and develop policy for as

Minister of Forestry. It found that the Green Party had received

\$53,970 from a person later found guilty of among the worst animal abuse in New Zealand history, and that National and Labour both appeared

to have lawfully circumvented disclosure rules to hide the original source of tens of thousands of dollars in donations.

Newsroom also found that Minister for Disarmament Phil Twyford had received

\$2,000 from a person who had previously claimed that the Christchurch massacre was a Jewish conspiracy (Twyford returned the donation). In addition, Newsroom

reported

last year that ACT had accepted (and subsequently retained) a donation from a far-right extremist who threatened to destroy mosques.

National Māori Authority chairman Matthew Tukaki denounced Bowker's comments. He called on Nash to return or donate Bowker's money, and said: "This guy's views on Māori in particular are pretty horrid. Politicians need to take a cold hard look at the kind of people they take money from."

Proactive Release

West, Nicholas

From: Helen Gould <helen.gould@lawsociety.org.nz>
Sent: Tuesday, 18 January 2022 2:57 pm
To: electoral
Subject: RE: Consultation on Political Donations Reforms

Kia ora Ashley

Thank you for your email. We have consulted several of our committees for feedback on the discussion document on Political Donation Reforms. We appreciate the opportunity you have given us to respond.

Thank you also for the offer of a meeting. At this stage we do not feel it is necessary to meet to discuss the proposals.

Our feedback on the document is relatively limited and is confined to the issue of possible changes to ban anonymous donations, as follows:

The balance between the competing interests of greater transparency and openness versus the protection of individual donor privacy is at play when considering changes to anonymous donations. A ban on all anonymous donations appears to be an intrusion on an individual's privacy (particularly in light of proposal 5 which requires the volume and total amount of donations under \$1500 to be quantified) with little public interest in knowing the identity of someone making low level donations. We are of the view that there is a real prospect that abandoning anonymity for small donations (a donation of \$1500 could be made at a modest payment of \$30 per week) will result in many individuals deciding not to donate if their identity will become a matter of public record.

I do hope this feedback is useful. Please do get back in touch if I can be of further assistance.

Ngā mihi

Helen Gould
Law Reform & Advocacy Advisor
New Zealand Law Society | Te Kāhui Ture o Aotearoa

lawsociety.org.nz

helen.gould@lawsociety.org.nz

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s9(2)(a)

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From: electoral <electoral@justice.govt.nz>
Sent: Friday, 14 January 2022 10:51 am
To: Helen Gould <helen.gould@lawsociety.org.nz>
Cc: inquiries <inquiries@lawsociety.org.nz>
Subject: RE: Consultation on Political Donations Reforms

Kia ora Helen,

I am following up on an email sent to you in December regarding the political donations review.

The Ministry of Justice is still keen to meet with you either in person at the MOJ National Office or via Teams/Zoom before the consultation closes at 5pm on Tuesday, 25 January 2022. Alternatively (or in addition to meeting with us), you can send written feedback by the closing date through our website at <https://consultations.justice.govt.nz/policy/political-donations/>.

Please let me know if you have any queries.

Ngā mihi
Ashley



Ashley Turner

Executive Support to Civil and Constitutional | Policy Group
Ministry of Justice | Tāhū o te Ture
DDI: +64 4471 7431 | **Ext:** 47431
Justice Centre – Level 6, 19 Aitken Street, Wellington
Ashley.Turner@justice.govt.nz | www.justice.govt.nz

From: Denoual, Hayley <Hayley.Denoual@justice.govt.nz>
Sent: Tuesday, 14 December 2021 10:45 am
To: helen.gould@lawsociety.org.nz
Cc: inquiries@lawsociety.org.nz; Turner, Ashley <Ashley.Turner@justice.govt.nz>; Singh, Avi <Avi.Singh@justice.govt.nz>; McKendry, Craig <Craig.McKendry@justice.govt.nz>
Subject: Consultation on Political Donations Reforms

Tēnā koe Helen

The Government is considering whether any targeted changes to the political donation rules should be progressed before the 2023 General Election and we are inviting Te Kāhui Ture o Aotearoa to provide feedback on a package of possible changes.

The Government is interested in improving the transparency and openness of the political donation rules. We have identified a range of potential measures which, collectively, aim to improve the overall transparency and openness of political donations without unduly restricting donors' ability to donate, or parties' and candidates' ability to raise the funds they need. We also have identified opportunities to simplify the administrative complexity of some of the rules.

We are also interested in your views on introducing a ban on anonymous donations, similar to the ban on overseas donations, which would potentially have impacts on transparency and also on compliance and reporting requirements.

We are writing to a range of subject matter experts with particular expertise in the legal framework, and financial reporting or audit requirements, for political donations in New Zealand, with a view to identifying the likely impacts of these changes to disclosure rules and thresholds and reporting requirements.

I have attached our fact sheet which gives you a summary of the proposed changes for your further information.

We would appreciate your feedback on these proposals, and are happy to meet with you either face-to-face or via online hui. To arrange a suitable time, please contact our Executive Support, Ashley Turner, by email: electoral@justice.govt.nz or phone: (04) 471 7431. Alternatively, you are welcome to provide your views in writing to our feedback email address: electoral@justice.govt.nz.

For your feedback to be considered, it needs to be received by **5pm on Tuesday, 25 January 2022.**

If you know other people with relevant experience or expertise who might be interested in commenting on these proposals, please feel free to share the link to our consultation page which gives more information and allows them to submit their feedback online:

<https://consultations.justice.govt.nz/policy/political-donations>.

Please do not hesitate to contact me if you have any queries or require further information.

We look forward to hearing from you.

Nāku noa, nā

Hayley



Hayley Denoual

Policy Manager | Electoral and Constitutional
Civil and Constitutional Policy
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- (1) reply promptly to that effect, and remove this email and the reply from your system;
- (2) do not act on this email in any other way.

Thank you.

Response ID ANON-VKQE-1UZZ-H

Submitted to Proposed changes to political donation rules in our electoral law
Submitted on 2022-01-25 16:06:52

Have your say

Tell us about yourself

What is your full name?

Name:
Daniel Takutaimoana Te Kanawa

What is your email address?

Email address:
dan@maori.org

Are you providing feedback as an individual or on behalf of an organisation?

Individual

What is the name of your organisation?

Organisation:
Tuhono Trust

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

All 4 requirements will be positive provide an improvement to enhance transparency and openness.

If all financial donations were required to be deposited into a dedicated bank account which had automated financial reporting system similar Xero, and donee details provided in the reference and details fields, reporting can be automatically at any time.

Any political donations not passed through the parties dedicated "political donations" bank account, can be treated as an evasion of the rules, and a breach to the rules.

A signed copy of the donees transaction can also be emailed to the political parties dedicated email address for record purposes and reconciliation.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

If automated transaction reporting and analysis was used, it would ensure all revenue was recorded real-time, thereby encouraging compliance.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

Anonymous donations need to be capped at around \$1,000 per bank account for online deposits.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

Response ID ANON-VKQE-1UB6-N

Submitted to Proposed changes to political donation rules in our electoral law

Submitted on 2022-01-14 14:28:42

Have your say

Tell us about yourself

What is your full name?

Name:

Grant Meyer

What is your email address?

Email address:

grant.meyer@newconservative.org.nz

Are you providing feedback as an individual or on behalf of an organisation?

Organisation

What is the name of your organisation?

Organisation:

New Conservative

Disclosure rules and thresholds

Do you think the proposed changes to disclosure rules and thresholds would improve transparency and openness? Why? (Please specify which proposal/s you are commenting on).

Q1:

No.

1; It would increase transparency but at the loss of privacy. So don't think this is warranted. The election process is currently not compromised. \$15,000 is not large anyway, when considering possible undue influence being exerted. Threshold should not be lowered.

2. No other group or charity report more frequently than once a year. All the donations are reported on a yearly basis, so no real improvement in transparency, just in timing, but large increase in costs for parties especially if audits of each report is required. Finding auditors are hard enough at present let alone trying to employ them on a more frequent basis. Increasing frequency is not necessary.

3. Yes, this requirement should be removed. The identity is disclosed during the annual reporting anyway.

4. No change required. if the value is large, it is disclosed in the current process. It would make further work for already over-worked volunteers, with no gain for the party.

Reporting

Do you think the proposed changes to reporting would help support compliance? Why? (Please specify which proposal/s you are commenting on).

Q2:

No.

5. Details are already kept. The value is low and ability to influence party decisions is zero. This sounds like more paperwork for the sake of it. No further reporting is warranted. Also Party volunteer staff are already too busy.

6. Not required as donations and loans are already reported. If full financial accounts were required, the auditing requirement should be similar to charities in that if turnover is low, audits/reviews will not be required. For small parties in particular, this just adds more unnecessary paperwork and consumes more value time of volunteers.

7. Candidate loan disclosure requirements could be similar to those for party loans.

Anonymous donations

What factors do you think are most important when considering changes to anonymous donations?

Q3:

The current threshold for disclosure is satisfactory.

The entire voting system is based on privacy of individuals. ie who we vote for is confidential. Therefore, donations from private citizens should in theory be confidential as well.

The current threshold for disclosure is satisfactory for avoiding any undue influence and providing a balance between privacy and transparency.

Anything else?

Is there any other feedback you would like to provide on these proposed changes?

Q4:

All these potential changes impact the work load and costs to small political parties in particular. But I see no gains at all from them regarding public trust in the electoral system.

The methods of selecting electoral boundaries and vote counting systems are much more likely to impact on public trust.

The 5% threshold for getting into parliament is a serious issue that needs to be addressed to improve public trust.

Proactive Release



25 January 2021

Rajesh Chhana
Deputy Secretary
Ministry of Justice

Via Email – electoral@justice.govt.nz

Dear Rajesh

Thank you for the invitation to submit written feedback on the package of potential changes to political donation settings.

This feedback is submitted on behalf of the National Party and in my capacity as National's Party Secretary - a position I have held for over eleven years. As Party Secretary I have been involved in four General Elections, overseen eleven donation audits and returns, and a significant number of special disclosures. The donations framework is an area I have significant experience in both applying and working with a wide range of volunteer officeholders to ensure the National Party's compliance with.

The National Party is a volunteer-run organisation comprised of 65 electorate entities, numerous special branches, and hundreds of volunteer officeholders across the country. Each electorate, branch, and officeholder, has a role in understanding and complying with the political donation settings and are supported by a small team of paid professionals based at our Service Centre, with 1.5 FTE focused on the finance space.

The volunteer-run nature of our Party makes changes to an already complex donations framework a particular concern for us. We believe a balance must be struck between the need for common-sense regulations that ensure the public has confidence in our democracy with the reality that volunteers are responsible for complying with an already highly technical regulatory framework.

Our view is that the existing donation settings balance this effectively and therefore does not require significant change.

Our feedback on the review's proposals are split into four areas:

- 1) **Concerns on the timeline and appropriateness of reviewing donation settings in isolation.**
- 2) **Concerns on the prospect of proposed changes being made unilaterally.**
- 3) **Reality of implementation.**
- 4) **Detailed feedback on individual proposals.**

This submission contains further detail on the themes raised during our in-person meeting on the 23rd of December 2021 and reiterates our strong recommendation that the review of political donation settings be merged into the announced Independent Review of electoral law.

We struggle to understand why the Ministry has prioritised a review of, and changes to, political donation settings at this time and refute the basis stated by the Ministry that "Recent high-profile incidents involving donations to major political parties or candidates..." justify the proposed changes. The incidents alluded to by the Ministry show that existing donation settings are in-fact working, being enforced effectively by regulating bodies, and are being dealt with in a transparent and judicially prudent manner.

It is important that these incidents are given the opportunity to work their way through the independent judicial process. Pre-empting outcomes while matters are still before the courts does not provide a sound basis for changes to any legal framework, least of all the legal framework that governs our democracy.

Cross-party support and agreement on electoral reform remains critical to public confidence in the integrity and longevity of our electoral system. Cross-party support assures the public that electoral law is derived in the public interest and not the interest of any one governing party.

Thank you again for the opportunity to submit feedback on the review. We look forward to continuing our engagement with the Ministry in this critical area of importance for our democracy.

Regards,



Greg Hamilton

Party Secretary | General Manager

New Zealand National Party

Concerns on the timeline and appropriateness of reviewing donation settings in isolation.

National opposes the Ministry's intent to progress with the specific review of, and changes to, donation settings within the proposed timeline and in isolation from our wider democratic framework. This seems particularly difficult to justify when a holistic review of electoral law has already been announced and is on the near horizon.

We oppose this for two reasons – 1) We do not believe the timeline will enable effective consultation on the existing framework, development of meaningful and sensible changes, or a reasonable window for implementation, and 2) We do not believe donation settings can be considered in isolation from the rest of our democratic framework.

Political parties will begin formally preparing their election campaigns by the middle of this year, 2022, including detailed campaign budgeting. By quarter three of 2022, these preparations will include the selection of candidates, appointment of campaign leaders, and other high-level planning. In earnest, campaigns will take flight in early 2023.

The initial timeline proposed in the Ministry's Cabinet Paper suggests proposed changes will not come into effect until the year of the general election, with implementation beginning just prior to this, or roughly 12 months out from a potential election date. Ministry officials informed us in late 2021 that these dates are likely subject to change given the disruption of COVID-19 on policy development, suggesting they will be further delayed until closer to the election date.

If the intention for delivery of changes to donation settings in time for the 2023 election continues, we are concerned that consultation, detailed proposal development, and implementation will be compromised with a risk that they disrupt parties' ability to operate effectively in the upcoming election. This timeline is insufficient, and unfair to expect volunteer-run organisations to respond and implement complex administrative and regulatory changes in the immediacy of a general election.

This likely timeline also runs counter to the precedent set by the electorate boundary review process that has been determined as too disruptive to run in an election year and therefore must be complete with sufficient time before the beginning of formal campaigns.

It is generally agreed that political parties play an essential role in our democracy – they find and support quality candidates for Parliament, actively uphold their regulatory obligations, hold one another to account and develop and present policies to the public in free and fair elections.

Core to delivering on this role is the ability to effectively raise and spend funds to finance these activities.

The Ministry's proposed changes to donation settings, particularly the proposed changes to disclosure thresholds, will have a significant impact (to a much greater degree than noted in the Ministry's own analysis) on this ability to raise funds. For National, we know the proposals would increase regulatory compliance costs whilst at the same time reducing our ability to raise the funds to meet these.

The consequence of implementing the proposed changes need to be considered alongside the exploration not just of donation laws, but also measures which would reduce parties' costs and regulatory obligations if parties means of administering and upholding them are compromised, or consider alternative funding models for political parties. We note this may on balance present bigger risks to public confidence than current arrangements.

Political donations are a key element of our current democratic system. They are intertwined heavily with parties' ability to fulfil their other democratic functions and the ability of voters to express support through donations. Donation settings must be considered in the wider scheme of electoral law as changes to these settings may have impacts on other components of our democratic system, and vice-versa.

Our concerns with the shortened-timeframe and belief that donation settings should be considered within the wider context of our electoral law, not in isolation, provide basis for this review to be bundled into the announced Independent Review of electoral law. This is an opportunity for a holistic, time-rich, and all-encompassing review of our democratic system, with proposals adequately offset across the system to reduce potential damaging impacts on parties and their ability to meet their democratic responsibilities.

Simple examples of the unintended consequences of completing a review in isolation, and progressing with current proposals, includes making financial donations to registered third parties (that are comparatively less regulated) and individual candidates (with significantly lower expenditure thresholds) relatively more attractive than giving to a political party. These consequences are counter to the intended design of our donation regime that encourages giving to parties, which are relatively less susceptible to influence, given their devolved nature, larger size, and greater expenditure caps.

Concerns on the prospect of proposed changes being made unilaterally.

National believes that at the core of our democratic system must be cross-party support and agreement on the rules that govern our elections. New Zealanders deserve, and expect, a system that is stable and has the longevity to build trust and confidence with the voting public. Implementing a change to donation settings, as a pre-cursor to a wider review, in an election year, is simply inviting the public to dismiss the changes as in the interest of the governing party.

We do not believe building cross-party support has been prioritised by this review which puts at risk the legitimacy, integrity, and longevity of any changes to donation settings. The debate on the Electoral Finance Act 2007 (and its eventual repeal in 2009) provides an example of the consequences of partisan changes to our democratic framework without cross-party consensus and highlights the risk of not placing this consensus at the core of decision-making.

Simply stated, pushing through electoral law without consensus undermines, not enhances, public confidence in the integrity of our elections and risks setting a precedent for future governments to implement new changes or reverse past changes without consensus support.

As you will see in our detailed feedback on the proposed changes, National has concerns with or opposes a majority of the proposals, signifying from the start a lack of cross-party support for their progression.

National is engaging on this topic in good faith. We believe supporting a robust, stable and sufficiently transparent democratic system is critical to building and maintaining public trust in our elections. This is a shared goal across Parliamentary parties, yet the current direction of the review is not enabling this.

Reality of implementation.

We do not believe the Ministry fully understands the significant regulatory burden of the proposals – particularly the lowering of the public disclosure threshold and increasing of donation reporting (particularly if moved to quarterly) – on volunteer-run political parties.

The National Party maintains a small staff (including 1.5 FTE focused on financial matters, including donations) to support and enable a wide range of volunteer officeholders that have significant responsibility for the day-to-day management and operations of the Party. A similar structure is true for all major New Zealand political parties, with smaller parties often having no paid staff and being entirely run by volunteers.

The proposals on public disclosure and regularity of reporting are not offset by significant reductions in other regulatory compliance activities and, as such, will be a large net addition to the workload of volunteer (and more importantly 'amateur') teams. This is an unfair expectation to place on volunteers and will act as a detractor for voters to become involved in political parties due to the burden and legal risk placed upon them.

It is important to keep in mind that volunteer Treasurers, already responsible for complying with existing donation settings, will face the brunt of the increased administrative and regulatory requirements. National sees roughly 50% churn in volunteer Treasurers from year-to-year as individuals shift through the critical, but pressured, complex, and time intensive role. This churn rate makes ongoing training and upskilling difficult to manage and we have concerns that the reviews' proposals would make these roles increasingly untenable for volunteers to manage. Making changes of this significance is particularly high risk in an already busy and complex election year environment.

To offset the impact of the proposed changes National would need to increase expenditure on paid staff and further investment in financial systems to enable compliance in an already complex environment. This is unreasonable

PROACTIVE RELEASE

expectation to place on parties that rely on donations to operate and will reduce parties' abilities to run effective campaigns that engage with the voting public as broadly as possible.

Realistically if the proposals were to be progressed, as suggested, the National Party would need to establish a programme of work outside of business-as-usual, including full-time staff resources, to undertake a detailed review of the impacts of the changes, make recommendations on solutions required, implement these into our organisation - and then an ongoing resource commitment to manage increased compliance costs and complexity. This would represent a significant cost and distraction for the Party that cannot be recouped.

The time to review and implement Electoral law changes is at the beginning of an electoral term, not the end.

Detailed feedback on the specific proposals is provided on the following pages

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Detailed feedback on individual proposals.

Proposed Change	National Party Feedback
<p>Lower public disclosure threshold for donations to \$1,500 for parties (which is currently set for \$15,000 for parties and \$1,500 for candidates).</p> <p>This would also remove the need to report in bands of up to \$5,000 and \$15,000.</p>	<p>National strongly opposes this proposed change.</p> <p>National believes the appropriate level for public disclosure of donations is the level at which the public could reasonably be concerned that a donation may influence a party or candidate, and therefore should be open to public scrutiny. We do not believe that donations to parties of up to \$15,000, when managed in compliance with existing robust frameworks, represent any such risk. Especially where a party can spend up to \$3m in a campaign, the current party donation threshold represents just 0.5% of total disclosable expenditure.</p> <p>Any requirement for public disclosure below the level that a donation could potentially influence a party is an undue restriction on privacy and democratic freedom, as the public interest argument for the disclosure (i.e., to prevent influence) is not present.</p> <p>In the same vein, we believe it is logical for the candidate disclosure threshold to differ to the party threshold. A \$1,500 donation represents 5.5% of a candidate’s total expenditure cap (\$27,500 in 2020) and agree becomes in the public interest for disclosure. A consequential differential between candidate and party donations is an important feature, not a weakness, of the existing donation settings, as it encourages giving directly to political parties rather than individual candidates. This incentive is crucial as a political party is far less susceptible to potential influence or coercion given its size and relative expenditure allocations. Placing parties, as opposed to candidates, at the centre of our donation framework is an outcome we should strive to achieve, and existing settings help achieve this, whereas proposed changes would eat-away at this and make donations to candidates relatively more attractive.</p> <p>This proposal also makes it relatively more attractive for political donors to provide funds to registered third party organisations that participate in election campaigns. These third-party organisations are comparatively less regulated and by decreasing the disclosure threshold for political parties by 90% to \$1,500 there will be an additional incentive to give funds to these groups to remain politically involved and protect privacy over giving to established, regulated, and more transparent political parties. In exploring such changes, consideration must be given to these types of additional issues, which cannot occur when reviewing donation settings in isolation.</p> <p>We are concerned that the Ministry has under-estimated the aversion of donors to being publicly identified and, therefore, the consequences of the proposals on parties’ incomes and ability to fulfil their democratic functions. We estimate that only a small fraction of donors who currently give between \$1,500 and \$15,000 would still be prepared to do so if their privacy were not protected. This is demonstrated by recent electoral returns, with only 14 donors prepared to give amounts of more than \$15,000 to the National Party in 2020, and 25 to the Labour Party.</p> <p>The chilling effect on donations above \$1,500 should the threshold be lowered will have a significant impact on parties’ ability to support candidates, meet regulatory requirements, and run effective election campaigns, with no alternative funding mechanism proposed or in-place to make up for this loss of income.</p>

	<p>We believe that the funding for political parties should come from those who support and would vote for them, and the shift to a \$1,500 limit would significantly impact the willingness of these individuals to give. Reducing the disclosure limit takes a step towards path dependency for state funding of political parties, which we have serious concerns about, and requires a much broader public conversation.</p> <p>National believes that the current disclosure thresholds are appropriate to prevent non-transparent influence. As such, there is no public interest case for reducing thresholds. Yet privacy and democratic freedom mean that there is a significant public interest case for the status quo. The reality is the existing disclosable threshold of \$15,000 represents 0.6% of National’s disclosed expenditure in the 2020 election.</p> <p>National would argue that given inflation since 2010, there may well be a public interest argument for increasing thresholds as opposed to decreasing them, to ensure we are protecting voters privacy and democratic freedom to support political parties as they see fit.</p> <p>We agree with the Ministry’s assessment that lowering the threshold to \$1,500 could potentially and inadvertently encourage donors to split donations to sit below the donation threshold and remain anonymous. This recognises that there is a general aversion from donors to be publicly known and tied to a particular political party, reinforcing our view that this will significantly reduce overall donation income as many donors previously giving between \$1,500 - \$15,000 would be unwilling to do so.</p> <p>We additionally do not understand why the Ministry has proposed \$1,500 as a new disclosure threshold. There does not appear to be any hard evidence to suggest \$1,500 is a significantly better threshold than other options of say \$5,000, \$10,000 or the status quo of \$15,000, and as discussed above, there is no public benefit in this change. We ask the Ministry to consider the justification for this, provide evidence to support this, and consider whether this lines-up with evidence of effective donation settings. Justification that the disclosure threshold for parties be the same as for candidates is simply not a logical move.</p> <p>These significant and wide-reaching impacts of decreasing the disclosure threshold provides additional reasoning to not review donation settings in a vacuum. The impact of changing disclosure thresholds alone will have wide reaching impacts on political parties’ ability to operate in areas that fall outside the scope of this review and are therefore not considered or accounted for.</p>
<p>Increase frequency of donation reporting (e.g., change from annual reporting to 3-or-6 monthly).</p>	<p>National strongly opposes a shift to 3-monthly reporting and finds 6-monthly a more palatable option.</p> <p>The current annual donation return process takes roughly 3 months from end-to-end, including significant work with over 65 volunteer Treasurers and engagement with external auditors. The result is generally a 30,000+ line donation record, amalgamated from our central database, 65 electorates and a number of special branches. The process is run and managed by volunteer Treasurers across the Party and supported by a one full-time staff member overseeing the return, alongside a large amount of time from the Party’s Chief Financial Officer and Party Secretary.</p> <p>Replicating this process four times over the course of a year (or 12 times in an electoral cycle) would place a significant regulatory and administrative burden on all parties. For National it would require the employment of at least one additional full-time staff member dedicated to overseeing the ongoing process along with negatively impacting the availability of the CFO and Party Secretary to complete other critical initiatives/BAU work programmes. This level of regularity would also significantly increase audit costs for parties.</p>

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	<p>An annual donation return provides the same information as a 3-monthly or 6-monthly return process, and as such, we see insufficient benefit of more regular reporting to justify the cost and regulatory burden placed on parties by this proposal. The status-quo should remain, or, if changes are considered essential by other parties, at least not more regularly than 6-monthly.</p>
<p>Remove the requirement that for donations that exceed \$30,000 the identity of donor and amount must be publicly disclosed within 10 days of receipt (via Electoral Commission).</p>	<p>National supports this proposal.</p> <p>We strongly support the recommendation to remove the requirement that for donations exceeding \$30,000 the identity of the donor must be publicly disclosed within 10 days of receipt. The nature of piece-meal donations across a reporting cycle, particularly across different branches of political parties, makes complying with this existing regulation difficult for all parties.</p> <p>We agree with the Ministry that removing this requirement will reduce administrative complexity and risk of inadvertent non-compliance. If this requirement was removed, we would be open to considering an increased reporting threshold for large donations of \$30,000+ in the lead-up to a general election to ensure that voters have knowledge of significant political giving as they make decisions on how to cast their vote. This provides the level of transparency required to maintain confidence in our democratic framework.</p>
<p>Introduce requirements for parties and candidates to disclose more details about in-kind (i.e., non-cash) donations.</p>	<p>National is not opposed to this proposal in principle.</p> <p>Existing donation settings are not entirely clear on how to handle in-kind donations, and parties/candidates rely on advice from the Electoral Commission on how to manage these. As such, they are currently reported on, but operate with less clarity than cash donations.</p> <p>Without a detailed proposal to consider we cannot provide further feedback, however, are not opposed in principle to this being clarified and codified.</p> <p>We further believe that there is opportunity to provide clarity on the handling of event based (e.g., raffles, movie nights, koha, etc) donations by contribution to guide political parties and ensure a consistent approach. This has not been addressed by this review and reinforces our recommendation that consideration of donation settings be included in the broader review of Electoral law.</p>
<p>Require parties and candidates to report on number and total volume of donations under \$1,500 for donations that are not made anonymously.</p>	<p>National is neutral on this proposal in principle.</p> <p>As all donations are amalgamated in the donation return process the data to inform this reporting does exist. However, we do not understand the problem trying to be solved or what the intended public good is of this proposal.</p> <p>We would recommend further investigation through the proposed public consultation during the review of Electoral law.</p>

PROACTIVE RELEASE

<p>Require parties to publicly disclose their audited annual financial statements.</p>	<p>National strongly opposes this proposal</p> <p>Each New Zealand political party operates under their own internal set of rules and constitutions. These rules usually spell out audit requirements, and as such, would impact each party differently, making the proposal difficult to implement effectively.</p> <p>For National, this proposal would require consolidation of all electorate and branch financials (70+ groups) and have these audited. This would likely double audit costs to roughly \$100,000 per annum with significant extra work required from the small professional finance team (1.5 FTE) employed by the Party. We do not see a net public good that offsets the increased administrative, regulatory and compliance costs.</p> <p>Fundamentally, there is no need for parties to disclose their audited financial statements as they are already required to disclose their donations and campaign expenditure. Other income for the National Party comes through membership fees and a small amount of interest income. There is already a requirement in National Party rules for such information on annual financial performance to be reported to members. There is also no expectation from donors that, when making their donations, they will see this information.</p>
<p>Introduce requirement for candidates to report on loans.</p>	<p>National is not opposed to this proposal in principle.</p>
<p>Ban on anonymous donations (similar to a ban on overseas donation).</p>	<p>National is not opposed to this proposal in principle.</p> <p>In principle we are not opposed to a ban of this nature given donations protected from disclosure via the Electoral Commission (whereas the donor is not disclosed to the Party they have given to, and their name is not disclosed publicly) remains a viable option for those wishing to give anonymously in a regulated manner.</p> <p>That said, we are concerned that the mechanism to implement and the process to guarantee a ban would be complex and cumbersome. A ban of this nature is likely to add significant regulatory burden and legal risk to political parties, and volunteers, with very little gain or public benefit.</p> <p>We struggle to understand the Ministry's rationale behind the proposal to ban anonymous donations as we have not seen or been presented evidence to show there are widespread problem cases or concerns arising from current settings. This reinforces the view that the change is likely to see limited public benefit and which may not offset the increase in compliance activity that will be required.</p>



Head Office: 42 Reyburn House Lane, Whangarei Ph 021 922098
Email: secretary@socialcredit.nz Website: www.socialcredit.nz

24th January 2022

Mr Rajesh Chhana
Deputy Secretary Policy
Ministry of justice
Wellington

Greetings Rajesh

Thank you for the opportunity to present our party's feedback on the potential options for changes to the donation rules under the Electoral Act.

Social Credit made extensive and in-depth submissions to the original investigation in the early 1980s to the proposed changes from First-Past-The-Post to Proportional Representation. A major driver of that change was, of course, the 1981 election result which saw Social Credit gain 20.65% of the nationwide vote. That very large block of voters ending up being represented in parliament by only two MPs because of the un-democratic nature of the FPP system.

Our view has always been that the electoral process, and in particular the funding of it, should be as transparent as possible and be heavily biased towards a regime which delivers the upmost benefit to individual voters as against political parties.

We have dealt with the items as numbered on the proposed changes sheet followed by the other issues and lastly some additional thoughts.

1. We support the proposal to lower the public disclosure threshold to \$1,500 for donations to parties, to align it with that currently set for candidates. We agree that the listed merits are of value and while the change could reduce the amounts donated we do not see that as likely to be significantly. We think people who are of a mind to donate sums of that sort (or larger) will likely do so anyway.

The splitting of donations already takes place and those are required to be aggregated and reported on under current law and that would still be a requirement under the proposed change. We do see an issue where donors may now consider that donations to a party and a number of candidates may be a way of getting around the disclosure rules. Making it an offence to not disclose donations of \$1,500 or more in aggregate to a party and/or its candidates may be a way of countering that possibility.

2 & 3. We support the increase in donation reporting frequency from annually to six monthly, however retaining the requirement to report donations that exceed \$30,000 within 10 days during the election period. The six monthly donation reporting change would increase compliance activity and we suggest that a full audit of donations remain on an annual basis as is currently the case.

We agree that proportionate mechanisms for non-compliance need to be part of any change and those could include a short period of grace in the event of a return not being filed on time, to a financial penalty for failure to comply, up to deregistration following significant and ongoing breaches.

4. We support a move to introduce reporting of in-kind donations to both parties and candidates. This could perhaps be set at the \$1,500 level proposed in number 1.

For example, if an individual or company donated an item for an auction that sold for \$1,500 or greater the name of both the donor and the successful purchaser might need to be disclosed. This could also apply to fundraising dinners or meet the cabinet minister type of events where the ticket price was \$1,500 or greater or where companies purchased a number of tickets that came to \$1,500 or greater. In that case the name of the individual purchaser or the company would need to be disclosed.

We suggest also including the situation where somebody with particular expertise is seconded to work for a political party or candidate but is paid by a company, group, or individual to undertake that role. Where the payment was in total \$1,500 or greater or an accumulated amount under different task headings over the reporting period came to \$1,500 or more the name of the payer would need to be disclosed.

5. We support the suggestion to require parties and candidates to report on the number and total volume of donations as outlined. This would not be a significant burden on reporting requirements.

6. We support the proposal to require parties to publicly disclose their annual financial statement, however this could perhaps be done under review requirements rather than full audit.

This has been a requirement of Social Credit as an incorporated society since 1953. The transparency of financial information being available for public perusal, particularly by voters so inclined, we see as an important component of the democratic system.

7. We support the proposal to require candidates to report on loans. While we accept that this would increase compliance activity, which for smaller parties is often a significant burden, and would likely fall on party secretaries, none-the-less loans to candidates are effectively donations albeit ones that are repayable overtime, but these loans could also be written off by the donor and thus becoming donations by another name.

Other issues.

1. The suggestion of considering a tiered system for annual reports to the Electoral Commission we find has some merit. There is a difficulty in finding independent auditors who are prepared to take on the potential risks involved in auditing the accounts of a political party. This means that especially for the smaller parties there is a significant financial burden involved in having to engage one of the major accounting firms prepared to undertake this task. A tiered approach would address those difficulties.

2. Returning to our point at the beginning of this submission that the electoral process should be biased towards voters, we believe that any group who stands candidates for parliament should be required to comply with the donations rules that apply to registered parties. While overseas influence in our electoral process does not, up to this time, appear to have been a concern, we view it to be an increasing one. Unregistered parties might provide a channel for that influence therefore ensuring compliance with the rules that apply to registered parties is a useful way of assisting transparency.

3. We applaud the consideration of applying accountability to unspent donations received by candidates, although our experience is that, particularly for smaller parties, candidates are most likely to spend all of any money donated. Notwithstanding that however, accountability should be in place and our suggestion is that any unspent funds need to be shown on candidate returns and those unspent funds transferred to the candidates' party headquarters account.

Candidates who are selected for the next subsequent election could apply to the party for the return of those funds in the build up to their next campaign. Those transfers of funds should be shown on both party returns and candidate returns. Any funds transmitted to a party account where the candidate does not subsequently stand again could be retained by the party.

4. We believe that in regards to section 208 of the Electoral Act, if a person or entity has given a non-anonymous donation of \$1,500 or more they should not qualify to then give an anonymous donation of whatever sum.

5. We believe consideration should be given to a situation where an individual makes a donation under the proposed \$1,500 threshold and also has effective control of companies which also give donations. In that situation all those donations should be aggregated and disclosed under whatever aggregation requirements those donations total.

6. We strongly support any move to ban anonymous donations, except as under section 208a of the Electoral Act. A democracy can hardly be considered transparent when anonymous donations are allowed.

If donors are sufficiently motivated to make large donations to political parties then they should be prepared to allow that motivation to be made public. In many cases donors donate to more than one political party so a donation does not automatically indicate who they will vote for on Election Day.

7. We made the point in 2. (above) that while overseas influence in our electoral process, up to this time, appears to be minimal, we view with increasing concern.

We therefore believe there is a need for a statutory declaration process for donations, either one-off or in aggregate, of \$30,000 or more by any individual, company, entity, or group. They should be required to declare that they have not been compensated in any form, financially or otherwise, for those donations by any individual, entity, company, or group domiciled either inside or outside New Zealand.

We thank you for the opportunity to present our views on these issues for your consideration and would be happy to discuss any aspects of them with you as you see fit. We are happy for our views, in this submission or subsequent consultation, to be made public

Yours faithfully

Anne Leitch

Party Secretary

Internal File Note

Author	Keeshonn Watene, Policy Advisor	File reference TBC
Date	4:00pm to 5:00pm, Wednesday 2 February 2022	
Location	Zoom	
Subject	Proposed changes to political donations rules (meeting with the ACT Party)	
Participants	<u>MoJ</u> Hayley Denoual, Acting Policy Manager (HD) Craig McKendry, Policy Lead (CM) Keeshonn Watene, Policy Advisor (KW)	<u>ACT New Zealand Party</u> Danae Smith, Party Secretary (DS) Styan Barron, Legal Advisor (SB) Tim Jago, President (TJ)

1. KW, CM and HD met with DS, SB and TJ from the ACT New Zealand Party (ACT). This internal file note briefly summarises the discussion.
2. The discussion forms part of the Ministry of Justice's targeted consultation with the party secretaries of registered political parties to discuss the proposed changes to political donations rules, ahead of any potential legislative change in this area.

A. Introductory/general comments

3. CM introduced MOJ and discussed the scope and structure of the meeting – looking at political donations from a party perspective, and timeframe to make changes to the electoral system.
4. Looking at the existing mechanism and making incremental changes rather than large constitutional changes. Donations returns as they stand now and the impact of potential changes.
5. ACT Party reps then started generally started talking about issues that relate across the proposals.
6. TJ and DS: Compliance with the current settings is huge. A lot of time is required to go over party information but also have it double checked. Huge cost involved.
7. Getting accounts audited takes a lot of time and manpower a lot of back and forth between auditor and members to double check things.
8. TJ and DS: Auditing accounts cost between 15k-20k per occasion. The Party has fixed cost between 45k-60 per annum with a full-time employee under current settings. If frequency of reporting was increased this may need to add another employee adding more cost.

9. TJ and DS: Noted that a lot of the cost are fixed cost and that this doesn't change depending on how much donations come in. some election cycles they may get a lot of donations others it might be significantly less.

B. Comments on proposal #1 (lowering the threshold for political parties to disclose the identity of donors from \$15,000 to \$1,500)

10. DS, TJ and SB: raised the following points on this proposal:
 - a. They disagree with lowering the threshold, this would require too much work to comply with new thresholds. They suggested that the current bands work well.
 - b. They also questioned why the 1,500 thresholds. Their view was that the threshold does not need to be consistent with Candidate thresholds as you are dealing with very different scales in terms of the number of and value of donations received.
 - c. They were concerned about the potential impact of the lower disclosure threshold for party donations on people's desire to donate (anonymously or otherwise) given the general aversion to public disclosure of political affiliation in New Zealand, what impact this could have government contracts for businesses that donate.
 - d. There is no guarantee that people won't be affected through the increased risk of public disclosure.
 - e. The lower threshold would be huge work for a party while also looking over candidates' ones.

C. Comments on proposal #2 (increasing the frequency of reporting of donations by parties)

11. DS: don't agree with this option. Planning for the year is set up around reporting. Auditing takes approximately three months, involves a lot of back and forth. Increased cost as they wouldn't want volunteers involved with this process and having to do it more frequently.
12. Ensuring multiple amounts received from the same donor are aggregated correctly will be very difficult with 3-monthly reporting

D. Comments on proposal #3 (removing the requirement that the identity of donors making donations over \$30,000 must be reported to the Electoral Commission within 10 days [alongside proposal 2])

13. DS: No problems with this proposal.

E. Comments on proposal #4 (requiring more detailed disclosures of in-kind (non-cash) donations)

14. DS: Okay with proposal if it's not too complex. Don't do much in this space e.g. around dinners to meet members.

F. Comments on proposal #6 (requiring parties to release their audited annual financial statements, and simplifying the audit requirements to make audit reviews more meaningful)

15. DS, TJ and SB: Do not support this proposal. Do not see the benefit for the public with this being released to them. Small parties may have higher cost associated with leasing building over owning them. The income streams are narrow.

G. Comments on proposal #7 (introducing a requirement for candidates to disclose loans)

16. DS: No problem with this proposal they don't have them and don't accept them.

H. Other issues

17. DS, TJ and SB: Unspent donations are not an issue as donations are made to the party and are held by the party. Candidates ask donors to donate to the party. Accounting is done centrally with no electorate accounting. Recognise this may be a bigger issue for the larger parties.
18. Raised questions around parties receiving contributions by third parties and people who contribute to those third parties not knowing that this is being passed on to political parties. How are joint contributions ring fenced?

Internal File Note

Author	Avi Singh, Policy Advisor	File reference TBC
Date	3:00pm to 4:00pm, Monday 20 December 2021	
Location	Ministry of Justice	
Subject	Proposed changes to political donations rules (meeting with Green Party of Aotearoa New Zealand - Greens)	
Participants	<u>MoJ</u> Rajesh Chhana, Deputy Secretary Policy (RC) Craig McKendry, Policy Lead (CM) Avi Singh, Policy Advisor (AS)	<u>Greens</u> Miriam Ross, Party Secretary (MR)

- AS, CM and RC met with MR, Party Secretary for the Green Party of Aotearoa New Zealand (Greens). This internal file note briefly summarises the discussion.
- The discussion forms part of the Ministry of Justice's targeted consultation with the party secretaries of registered political parties to discuss the proposed changes to political donations rules, ahead of any potential legislative change in this area.

A. Introductory/general comments

- RC: The purpose of consulting with parties before the Select Committee process is to obtain operational views at an earlier stage of the policy process
- MR: Greens generally supportive of increased transparency being the policy objective in relation to the political donations regime
- MR: But there is a need to be aware of the burden on small parties, particularly those outside Parliament; the Greens are a medium-sized party so can see both sides of this argument

B. Comments on proposal #1 (lowering the threshold for political parties to disclose the identity of donors from \$15,000 to \$1,500)

- MR: Concerns about privacy in terms of what donor details could be disclosed (e.g. residential address)
- MR: Greens use s9(2)(b)(ii) used by many non-profit organisations to track fundraising activity; is an old, clunky system which may make it hard to extract information for increased disclosure and reporting requirements and thereby create a big compliance burden

8. MR: s9(2)(b)(ii) (accounting software used by Greens) do not integrate with each other, so sufficient advance notice needed to adapt systems to any new (particularly increased) reporting requirements
9. MR: Concerned about the form in which reporting would be required e.g. can an exported file or copy-pasted information be provided, or does it need to be manually entered with details presented differently from what the software systems generate?
10. MR: Greens receive lots of donations by automatic payment, so reporting several small donations in aggregate will be easier than every individual transaction
11. MR: Do not want to see inadvertent errors punished e.g. donor changed their address without informing the party, which leaves the party in breach

C. Comments on proposal #2 (increasing the frequency of reporting of donations by parties)

12. MR: Greens want clarity on whether three-monthly reporting would mean reporting for the previous rolling 12-month period every time, or from the beginning of the calendar year, or only for the specific three-month period concerned?
13. MR: Greens process approximately 100 small donation transactions per month
14. MR: Increased reporting frequency also creates a cost concern if this leads to increased auditing requirements

[see paragraphs 15 and 22 for other comments related to this proposal]

D. Comments on proposal #3 (removing the requirement that the identity of donors making donations over \$30,000 must be reported to the Electoral Commission within 10 days [alongside proposal 2])

15. MR: Greens in favour of keeping the 10-day rule alongside the annual donations reporting period
16. MR: The 10-day rule is needed during the regulated pre-election period
17. MR: Greens would support lowering the disclosure threshold under the 10-day rule to \$10,000

E. Comments on proposal #4 (requiring more detailed disclosures of in-kind (non-cash) donations)

18. MR: Support this proposal in principle but hard to fully quantify, requiring estimates which are necessarily malleable
19. MR: Greens National Office helps organise donation returns for all candidates as well as all party branches to help facilitate regulatory compliance

F. Comments on proposal #5 (requiring disclosure of the volume and total dollar amount of donations under \$1,500)

20. MR: In principle, Greens do not accept anonymous donations and are happy to provide this information to the Electoral Commission

G. Comments on proposal #6 (requiring parties to release their audited annual financial statements, and simplifying the audit requirements to make audit reviews more meaningful)

21. MR: Greens support this proposal in principle, but would prefer for a partial financial review to be the audit standard rather than a full audit as this would be very expensive
22. MR: Could audit for donations return and audit for financial statements happen simultaneously? As this has practical implications for dates for reporting to party AGM and publishing financial statements

[see paragraph 14 for other comments related to this proposal]

H. Comments on proposal #7 (introducing a requirement for candidates to disclose loans)

23. MR: Greens support this proposal

I. General comments

24. MR: Registered political parties should be able to retain unspent donations since the party has the power under its constitution to collect donations generally for operational purposes, and also because it can be hard to sometimes distinguish between a donation specifically for an election campaign and a donation generally to the party as these may be intermingled
25. MR: Support prohibition of anonymous donations
26. RC: How many staff do you have?
- a. MR: 13 non-parliamentary staff (including 2 part-time staff) at the National Office, supported by other party staff where possible
 - b. MR: Post-election reporting requirements can break staff and volunteers, particularly since they have also had to manage candidate nominations processes before and during the election campaign in addition to running the election
27. MR: Excessive focus on the pre-election period (despite a big increase in donations during election years) as the Greens see themselves as a three-year rolling entity, and it is good to consider the wider three-year period to make sure there is no deliberate avoidance of donation rules by parties



Miriam Ross
 Party Secretary and General Manager
 Level 1, 17 Garrett St, Wellington

20 Dec 2021

	Ministry of Justice proposals	Green Party response
1	Lower public disclosure threshold for donations to \$1,500 for parties (which is currently set at \$15,000 for parties and \$1,500 for candidates). This would also remove the need to report in bands of up to \$5,000 and \$15,000	We support the intention behind this, but there are a few administrative issues which will need to be carefully worked through. We would need sufficient lead-in time (minimum of 2 months) so we can change our reporting systems. We do have concerns about privacy (will the full name and address of every donor be published on the EC site?) and administration (will we need to provide more than a name and address?; will we need to itemize each donation or can they be collated?; do we need to cut and paste data into the EC documents/portal or can we provide a cvs file exported from our database?; will there be a provision for minor incorrect data such as an out-of-date postal address?)
2	Increase frequency of donation reporting (e.g. change from annual reporting to 3- or 6-monthly)	We have concerns about this because we believe it will create unnecessary administrative burdens and costs. If each donation return needs to be audited (as is the case right now) this will be prohibitive for small parties to operate. Will it be an accumulative total that we report each time and will that be accumulating since the beginning of the calendar year or in the previous 12 months? Our preference, as noted below, is to retain the rolling disclosure scheme.
3	[Along with proposal 2] Remove the requirement that for donations that exceed \$30,000 the identity of donor and amount must be publicly disclosed within 10 days of receipt (via Electoral Commission)	We think it is important to retain the 10 day disclosure as it prevents donors from donating large amounts a few months out from an election (which would still be possible under proposal 2) and not having the disclosure made until after the election. Our preference would be to reduce the threshold to \$10,000, retain the 10 day disclosure, and keep the frequency of further donation reporting to once annually. Most important to us is that quick disclosure requirements around elections are retained.
4	Introduce requirements for parties and candidates to disclose more details about in-kind (i.e. non-cash) donations	We fully support greater transparency in this area but general disclosure of in-kind donations (assuming this would also include volunteer labour) would be administratively impossible. Our preference would be for disclosure around very specific in-kind donations, e.g. auctions, dinners and raffle prizes.
5	Require parties and candidates to report on number and total volume of donations under \$1,500 for donations that are not made anonymously	We already provide this information to the EC and are happy to continue to do so.

6	Require parties to publicly disclose their audited annual financial statements	We already do this on the Companies website and are happy to provide this information for other sites. Currently we provide a financial review rather than a full audit and our preference would be for this to continue as a full audit would be prohibitively expensive. We also provide this information after the end of the financial year and would want a sufficient timeline from the end of the financial year to the reporting date to be in place so that there is sufficient time for the review/audit.
7	Introduce requirement for candidates to report on loans	We do not currently have candidates loan money to themselves and would support reporting on this.
	The effectiveness, efficiency and appropriateness of the current audit approach, including whether or not the system should be 'tiered' for audit purposes (taking into account differing risk profiles and mitigations);	We agree with the current audit approach and feel a tiered system would include an unmanageable administrative cost.
	Issues arising from the absence of accountability rules relating to 'unspent' donations received by candidates, or unregistered parties.	We would support regulations relating to unspent donations received by candidates or unregistered parties but not for registered parties. Our incorporated society rules allow us to collect donations (including during the election period) for a wide range of activities relating to the Party.
	Green Party Other Considerations	<p>Going forward beyond the current considerations, we support:</p> <ul style="list-style-type: none"> ● exploring whether only allowing named-persons to donate would increase transparency i.e. the removal of the ability to donate via trusts; ● a cap on the overall amount someone can donate or loan to a party in a given year; ● the Electoral Commission's recent recommendations for an over-arching "anti-collusion" provision, adding a "failure to transmit" offence, and strengthening the Commission's investigatory, enforcement and sanction powers; ● prohibiting anonymous donations; ● greater public financing for political parties to meet the administrative costs of greater donation transparency

Internal File Note

Author	Avi Singh, Policy Advisor	File reference TBC
Date	10:00am to 11:00am, Tuesday 18 January 2022	
Location	Ministry of Justice	
Subject	Proposed changes to political donations rules (meeting with New Zealand Labour Party - Labour)	
Participants	<u>MoJ</u> Rajesh Chhana, Deputy Secretary Policy (RC) Hayley Denoual, Acting Policy Manager (HD) Craig McKendry, Policy Lead (CM) Avi Singh, Policy Advisor (AS)	<u>Labour</u> Rob Salmond, Party Secretary (RS)

1. AS, CM, HD and RC met with RS, Party Secretary for the New Zealand Labour Party (Labour). This internal file note briefly summarises the discussion.
2. The discussion forms part of the Ministry of Justice's targeted consultation with the party secretaries of registered political parties to discuss the proposed changes to political donations rules, ahead of any potential legislative change in this area.

A. Introductory/general comments

3. RC: The purpose of consulting with parties before the Select Committee process is to obtain operational views at an earlier stage of the policy process
4. RS: Labour's operational arm supports the proposed changes to political donations rules, noting it already prepares audited financial statements and collects the information relating to the volume and total dollar amount of donations under \$1,500 that would be disclosed under proposal #5
5. RS: Proposals #1 and #4 are of the most interest

B. Comments on proposal #1 (lowering the threshold for political parties to disclose the identity of donors from \$15,000 to \$1,500)

6. RS: Support aligning political party and candidate donation thresholds to avoid funnelling of candidate donations through parties
 - a. RS: But consideration could be given as to whether the aligned thresholds could be higher - \$3,000? \$4,000? \$5,000?

7. RS: Some people want to donate only up to the point where they retain their privacy
 - a. RS: Some people have asked us what the threshold is, so there is a chance some people will reduce their donations in proportion to a lower threshold
8. RS: Lower donations make it harder for parties to run election campaigns
9. RS: The Electoral Commission's protected disclosure regime is very difficult for Labour to manage practically, because parties don't know where the money comes from and donors don't usually know about the protected disclosure regime
 - a. RS: Conversations with donors about the protected disclosure regime would be awkward, because they could be viewed as an attempt to circumvent the intended anonymity of the regime and a potential attempt to make a prohibited disclosure¹
10. RS: Could top up the broadcasting allocation² with money lost because of lower donations thresholds?
11. RS: Some donors don't like being publicly associated with a party and their politics
 - a. RS: Some donors note fear of their identity being disclosed is a key factor in reducing their donation
12. RS: Need to ensure parties can still legitimately raise donations to run election campaigns
13. RS: Labour uses s9(2)(b)(ii) to track donations, alongside s9(2)(b)(iii) as accounting software
14. RS: Labour Head Office asks branches to report donations to them in advance of any reporting to the Electoral Commission
 - a. RS: Head Office can view accounts for almost all branches, but reliant on branches for information about donations from raffle tickets and bake sales etc.
15. RS: To set the aligned thresholds for donations to political parties and candidates, test the National Party's approach by viewing their flyers which communicate the best way to help candidates is to donate to the National Party
16. RS: If money goes straight to a candidate, Labour treat this as a candidate donation and treat money going straight to the party as a party donation
 - a. RS: But a Local Electorate Committee's donation to a candidate through bake sale income etc. could be viewed as similar to someone who gives a party \$5,000 to give to a candidate
17. RS: Labour asks candidates to send candidate donation returns to the party before submitting them to the Electoral Commission to help align the returns

¹ Section 208F of the Electoral Act 1993 sets out the offence of prohibited disclosure relating to the Electoral Commission's protected disclosure regime.

² See Part 6, Broadcasting Act 1989.

18. RS: Party secretaries could take on responsibility under the Electoral Act 1993 for preparing and filing candidate donation returns only if the candidate is also still responsible for these tasks

C. Comments on proposal #2 (increasing the frequency of reporting of donations by parties)

19. RS: Three-month reporting hard for volunteers at branches
- a. RS: Volunteers will try to comply, but compliance levels and quality of information provided may be lower than they are now
20. RS: Labour receives most donations directly, but Head Office still needs branch co-operation

D. Comments on proposal #3 (removing the requirement that the identity of donors making donations over \$30,000 must be reported to the Electoral Commission within 10 days [alongside proposal 2])

21. RS: The 10-day rule can continue to be managed by Labour Head Office staff in addition to greater reporting requirements, because Labour do not receive many donations over \$30,000 in a 12-month period

E. Comments on proposal #4 (requiring more detailed disclosures of in-kind (non-cash) donations)

22. RS: Artists usually gift artwork that Labour auctions for sale to raise funds
23. RS: Person who loses value is the donor
24. RS: Labour believes the artist is the donor if the artist gifts a painting worth \$10,000 to the party which the party sells for \$10,000
25. RS: Labour hires two independent valuers who give a range for the market value of each piece of artwork donated to the party
- a. RS: Labour uses the independent valuers' ranges as the basis to estimate the reasonable market value of each piece of artwork
26. RC: Since the people attending a political party's art auction know where the money is going, should the buyer of an artwork be recorded even if there is no gain for them?
- a. RS: Preferably the buyer is not recorded unless they paid an amount above reasonable market value
27. HD: Money aside, in-kind donations are about two parties to a transaction that could potentially influence political parties
- a. RS: Agreed, but it is hard to understand what the market value connection is with each party in some of those transactions

28. RS: Labour's other ways of raising money have included organising a business conference where the ticket price was \$1,800, and a dinner where the ticket price was \$600 but the food cost s9(2)(b)(ii)
- a. RS: Labour treated funds received from these events as market income, not donations, because GST was paid and profit-making is required
29. RS: Labour considers sale of merchandise to be market income
30. RS: Raffles are not recorded that well because of their nature
31. RS: Transparency makes sense, but don't want to inappropriately make someone a donor when they have not donated anything of value
32. RS: Minimum Labour Party membership fee is \$5 for non-wage earners and \$20 for wage earners
- a. RS: This creates a potential issue for GST and tax purposes if a person decides to donate \$100: what recording is required? (e.g. \$20 membership fee, \$80 GST taxable income?)
- b. RS: This is possible to manage in the accounting system, but is complex and Labour usually over-reports its tax obligation to be safe

F. Comments on proposal #7 (introducing a requirement for candidates to disclose loans)

33. RS: Labour's position is that candidate campaign funds are for the campaign, not the candidate personally, so should pass to the next candidate campaign if unspent

G. General comments

34. RS: Public interest in knowing who funds politics outweighs misaligned spending caps because the amounts involved are still proportionally significant in the context of New Zealand political spending
35. RS: Small parties less in danger of spending cap breaches, but for the Labour party secretary, it is hard to get visibility over all branch and candidate activity
36. RS: Labour have a full-time finance person
37. RS: Small parties will struggle with compliance and audit cost of the proposals

Internal File Note

Author	Avi Singh, Policy Advisor	File reference TBC
Date	9:00am to 10:00am, Thursday 23 December 2021	
Location	Ministry of Justice	
Subject	Proposed changes to political donations rules (meeting with New Zealand National Party - National)	
Participants	<u>MoJ</u> Rajesh Chhana, Deputy Secretary Policy (RC) Hayley Denoual, Acting Policy Manager (HD) Craig McKendry, Policy Lead (CM) Avi Singh, Policy Advisor (AS)	<u>National</u> Greg Hamilton, Party Secretary (GH) s9(2)(a), Strategy and Capability Manager (SS)

- AS, CM, HD and RC met with GH, Party Secretary for the New Zealand National Party (National), and SS. This internal file note briefly summarises the discussion.
- The discussion forms part of the Ministry of Justice's targeted consultation with the party secretaries of registered political parties to discuss the proposed changes to political donations rules, ahead of any potential legislative change in this area.

A. Introductory/general comments

- RC: Thank you for meeting with the Ministry for the second time to discuss this topic
- GH: These proposed changes are not a small piece of work and should be considered as part of the wider electoral law review, not consulted on separately over the Christmas period
- GH: Not sure the proposals will address the issues caused by the 'high-profile incidents' referred to in the Ministerial briefing – and in any case, National has only had two such incidents in the 11 years GH has been party secretary

B. Comments on proposal #1 (lowering the threshold for political parties to disclose the identity of donors from \$15,000 to \$1,500)

- GH: Concerned about the potential impact of the lower disclosure threshold for party donations on people's desire to donate (anonymously or otherwise) given the general aversion to public disclosure of political affiliation in New Zealand
 - GH: Threshold needs to consider public interest in transparency against the private interest in freedom of association and freedom of speech/expression

- b. GH: \$1,500 represents less than 1% of the election spending cap, so cannot possibly unduly influence the party receiving it
 - c. GH: The increased likelihood of inadvertent non-compliance due to the increased regulatory burden will only further negatively affect, rather than improve, public confidence in the donations regime
 - d. GH: Quite easy for ordinary party members to end up donating over \$1,500 through attending various events
 - e. GH: Absence of state funding or other mechanism to compensate for lost donations due to lower disclosure thresholds will create financial and operational issues for political parties
7. GH: Disagree with aligning candidate and party donation disclosure thresholds given the different election spending caps for candidates and parties, because the current \$1,500 threshold for candidates constitutes approximately 5-6% of the election spending cap for candidates, while lowering the threshold to \$1,500 for parties would constitute no more than approximately 0.01-0.6% of the party election spending cap
- a. GH: Lack of clarity about the period within which you can donate to candidates could affect extent to which there are unspent donations
8. SS: The high proportion of volunteers across the party branches will make it very difficult to corral all the information proposal #1 would require disclosure of

C. Comments on proposal #2 (increasing the frequency of reporting of donations by parties)

9. GH: Changing fundamental components of the donations regime in an election year such as reporting frequency would be dangerous, and lead to major difficulties with operational compliance in the same manner as those caused by late changes to electorate boundaries
10. SS: Hard to explain regulatory changes to volunteers – approximately 50% of time at National Office spent on ensuring compliance
11. GH: Currently, National's focus on compliance begins when donations of over \$5,000 are received, but lowering the disclosure threshold would change the level National's focus begins at to the \$500 mark, increasing compliance efforts significantly
12. GH: Worried about 3-monthly reporting as currently it takes the equivalent of one full-time staff member 3 months to compile the annual donations return and a further month working with the auditor
- a. GH: Ensuring multiple amounts received from the same donor are aggregated correctly will be very difficult with 3-monthly reporting
13. GH: Six-monthly reporting more possible

14. GH: Noted in confidence that National spends approximately \$50,000 each year on auditing the annual donations return with the total amount being approximately \$2 million, so more frequent reporting would be hard if this meant equally frequent auditing
15. GH: Need to be able to audit annual donations return and financial statements simultaneously as is currently the case for National
16. GH: A financial review could work better than the current audit approach, which leads to qualified audit opinions of limited value
17. SS: National informs donors who are near the current \$15,000 disclosure threshold so they are aware their name may become public if they donate over the threshold

[see paragraph 25 for other comments related to this proposal]

D. Comments on proposal #3 (removing the requirement that the identity of donors making donations over \$30,000 must be reported to the Electoral Commission within 10 days [alongside proposal 2])

18. GH: National supports removal of the 10-day rule, except in election years

E. Comments on proposal #4 (requiring more detailed disclosures of in-kind (non-cash) donations)

19. GH: The current rules are clear relating to auctions, and this proposal could add another layer of complexity
20. GH: National has a donations recording template with instructions on how to process auction items, covering the name of the person buying the item(s), how much they paid for the item(s) and what event(s) they attended
21. GH: The current rules are vague about the dollar threshold at which individual raffle donors' names need to be disclosed
22. GH: Dinners are hard to quantify aside from the costs incurred that can be expensed e.g. how much is the party leader speaking at a dinner worth?
23. GH: Difficult to retain treasurers at branch level (approximately 50% turnover annually) and requiring them to make these kinds of interpretations may increase that turnover level, particularly with volunteers who are not trained accountants

F. Comments on proposal #6 (requiring parties to release their audited annual financial statements, and simplifying the audit requirements to make audit reviews more meaningful)

24. GH: Concerned about how this would work in practice given that National does not prepare a consolidated set of accounts covering all its branches (which it is not required to do as an unincorporated society) – only consolidates accounts down to electorate level

25. GH: Cost of audits would skyrocket
26. GH: What is the public interest in seeing the profit and loss statements of political parties?
- a. GH: Fears this information could be misused in the competitive environment the political 'marketplace' operates in
 - b. SS: Political parties are still private, small-to-medium sized entities so should not need to disclose this information; already face significantly greater media scrutiny which would only intensify
 - c. GH: These two factors make parties different from the majority of incorporated societies (such as local bowls clubs) that publicly disclose their financial statements (which are not necessarily audited)
27. GH: National's most detailed accounts sit at the Board level in terms of visibility
28. GH: Perhaps the Electoral Commission should be able to view the audited accounts of political parties?
- a. GH: However, public disclosure would negatively affect operations given other parties and the media could view their expenditure in detail
 - b. GH: Public disclosure may lead to inconsistency around what is disclosed given parties operate differently and may prepare their annual statements differently

[see paragraphs 14, 15 and 16 for other comments related to this proposal]

G. Comments on proposal #7 (introducing a requirement for candidates to disclose loans)

29. GH: No reason why this proposal could not be introduced
- a. GH: Ideally the disclosure threshold would match the requirements for the pecuniary interest register all Members of Parliament (MPs) must complete
30. GH: In general, the party should be raising money rather than the candidate as often the candidate is not actually confirmed as standing until close to an election
- a. SS: National supports candidates and MPs not being at the centre of soliciting donations, with the party performing this role instead

H. General comments

31. SS: National would need to hire a full-time staff member to run a project to implement these proposed changes and to train all the volunteers across National's 70 branches
- a. SS: would prefer these changes are considered as part of the wider electoral law review, and then there would only need to be one project to implement all the changes arising from that review (instead of the potential need for two projects, one

to implement this package of changes and one to implement electoral law review changes)

32. GH: Need to be putting enduring arrangements in place rather than piecemeal tweaks
 - a. GH: Electoral matters should not be used to play politics, but should instead be the subject of cross-party support
 - b. SS: Bipartisanship on electoral matters is important for the public to trust and have confidence in the system
33. GH: The election campaign is six months in practice, even if the regulated pre-election period is officially three months
 - a. GH: Election year is very busy already with managing candidate nominations etc., so adding these changes would be hard operationally
 - b. GH: Springing these changes on donors who have been used to the current rules for a decade would also be difficult

Proactive Release

Internal File Note

Author	Braedyn Freebairn, Casual Advisor	File reference TBC
Date	2:00pm to 3:00pm, Monday 31 January 2022	
Location	Via telephone	
Subject	Proposed changes to political donations rules (meeting with NZ Outdoors Party)	
Participants	<u>MOJ</u> Craig McKendry, Policy Lead (CM) Keeshonn Watene, Policy Advisor (KW) Braedyn Freebairn, Casual Advisor (BF)	<u>NZ Outdoors Party</u> Alan Simmons, President and Co-Leader (AS) Sue Grey, Co-Leader (SG) Jenn Haakma, Party Secretary (JH)

1. This meeting is between MOJ advisors Craig McKendry, Braedyn Freebairn and Keeshonn Watene, and NZ Outdoors Party co-leaders Alan Simmons and Sue Grey and secretary Jenn Haakma. This internal file note briefly summarises the discussion.
2. The discussion forms part of the Ministry of Justice's targeted consultation with the party secretaries of registered political parties to discuss the proposed changes to political donations rules, ahead of any potential legislative change in this area.

A. Introductory/general comments

CM introduced MOJ and discussed the scope and structure of the meeting – looking at political donations from a party perspective, and timeframe to make changes to the electoral system.

Looking at the existing mechanism and making incremental changes rather than large constitutional changes. Donations returns as they stand now and the impact of potential changes.

Issue of disproportionate funding in disparity of which party gets publicly funded – not in scope.

Return as it stands

AS: The current situation doesn't affect us much because we don't get big donations so it's not a huge task.

In your proposal, it would mean more reporting for us. We agree with your statements on transparency because manipulating of funding is rife. We're interested in that question.

SG: Are you asking how we prepare our returns or something else?

CM: The amount of effort for you to do.

SG: Electoral returns are a nightmare because most of our candidates haven't done it before and the form is confusing.

We had a group campaigning on our behalf and none of the options included that. Jenn had candidates that were confused and didn't want to do it again because of the nightmarish process.

CM: And the actual party return?

SG: The party return wasn't as bad. I just filled it in with our figures. We didn't have a lot to declare.

We still had the problem that each candidate had to allocate which amount was party and which was electoral. The candidates didn't know they had to do that at the start so they didn't think about it. But most didn't need to declare much.

AS: We're not professionals and we don't have a big team.

JH: I had to go in and do everyone's again. The best way to do it is to do the figures myself and send it to all the candidates to sign.

Trying to get the system to do things was a bit frustrating. Sometimes it wouldn't accept and I had to call the office and explain so they could talk me through it. The electoral people were amazing.

CM: Let's talk about the audit side of things. How much does that cost you?

AS: Too much.

SG: Over \$2k. Most of it was because I would submit it and he would fix it and come back to me with it all wrong. There was no way for me to dictate it. Alan was trying to do it again and it cost us too much money for the mess we got.

AS: We got quoted \$6k. For a small party that's a big chunk. To have to do that maybe twice a year is quite a lot. We don't have big donations. When people donate, it's \$50-100. It's not \$30k.

SG: The big companies donate to big parties so they can influence them at some point. They don't donate to us because we won't get in so they don't see us as important.,

A lot of voters don't have the money – a lot of rural Maori who don't have high income and struggle to pay the subscription.

It would be good if there was an auditor that the govt employs and they know what to do and what's required and that's part of the cost of the electoral system. We didn't know we would have to do that, and it was quite a hassle raising the funds. We'd spent all our money.

SG: Our auditor had never done a party before, so Sue's suggestion that there be an auditor appointed within the system actually makes a lot of sense

Proposal to make publicly available financial statements
Are you an incorporated society?

SG: No, we're unincorporated.

CM: So your financial statements wouldn't be publicly available? Is it in your constitution?

AS: No, we haven't thought about that. We have recently discussed becoming an incorporated society. But we have mixed feelings about disclosure of our statements. It would be useful to have big parties disclose their statements but not sure about us.

SG: It should be transparent and everyone should know.

JH: I don't understand why it would be needed. The EC should know what's going on – but why the public? I don't know how it will help us.

SG: We know that big donors find ways to make donations to parties that they can influence the most and get the most benefits. But changing the rules doesn't fix it – if they don't do it through a bank they put it in a brown envelope. If they want to do something, they do it. Big entities can influence political parties. Fishing entities thought it was more cost effective to employ a politician than a lawyer – they made monthly donations to NZ First and other parties and if they needed an MP for a question or a meeting with a Minister, they had an MP that could set it up.

CM: In-kind donations – is that something that changes between big and small parties? Do you get mostly financial donations?

SG: Are you talking about someone helping us with our IT?

CM: No, the bigger events like dinner or auctions.

SG: We don't really have anything like that. I am curious if somebody's already an MP how they can charge to have dinner with them. I thought that was part of the job.

AS: We're keen to see more transparency around this sort of stuff.

SG: Need to make it easier to engage with democracy but also making the paperwork not harder than it needs to be. There should be someone in the government who can do that

rather than external person. Maybe bigger parties don't want that but for a smaller party like us it would be a huge advantage.

AS: Unregistered parties that took money from the public and transferred them into registered party

Advance NZ and NZ First having trusts that funnel money into the main party

Clarity around what's allowed and why

Including under 1.5k returns

CM: Is that something you have on hand or is that a whole new data collection hassle?

SG: We do record it.

AS: They are there. There's no problem reporting them. The issue is knowing that you have to report them to make the records easier. This writing out two cheques for \$15k is ridiculous.

SG: You could just look at the cumulative donations from one source rather than each individual donation. Our system records all the donations but it doesn't report to us what each one is. You'd have to count it – it's just the total, not the individual donation.

AS: I think we agree with changing the limit to 1.5k.

The rationale for the change is to align it with candidate spending. But the difference between spending for candidates and for parties is huge. There's an argument for not going down that low – reducing it down to something higher than 1.5K, maybe from 15k to 10k.

SG: Most of our donations are small. There might be a few generous people that donate 1k. There is one that we can think of that donates 10k. If it's over 1k it doesn't really make a difference to us.

AS: Our concerns are anonymous donations. We don't think there should be donations that are anonymous from anyone.

SG: Also donations should be from voters. A company shouldn't be able to donate because they can't vote. Corporations are the ones that have the big money.

We're supportive of them actually have to disclose who they are.

We think there should be a cap on anonymous donations – maybe 15k. Because there's no reason to have an anonymous donation under that.

Internal File Note

Author	Avi Singh, Policy Advisor	File reference TBC
Date	11:00am to 12:00pm, Tuesday 14 December 2021	
Location	Zoom	
Subject	Proposed changes to political donations rules (meeting with Sustainable New Zealand - SNZ)	
Participants	<u>MoJ</u> Craig McKendry, Policy Lead (CM) Avi Singh, Policy Advisor (AS)	<u>SNZ</u> Vernon Tava, Party Secretary (VT)

1. AS and CM met with VT, Party Secretary for Sustainable New Zealand (SNZ). This internal file note briefly summarises the discussion.
2. The discussion forms part of the Ministry of Justice's targeted consultation with the party secretaries of registered political parties to discuss the proposed changes to political donations rules, ahead of any potential legislative change in this area.

A. Introductory/general comments

3. VT: party secretary a daunting job given the legal liabilities that can arise from inadvertent non-compliance, which is worth bearing in mind when proposing to increase their legal obligations; but the Electoral Commission (EC) are very helpful and reasonable
4. VT: SNZ a new party registered in December 2019 with 11 electorate candidates (10 of whom stood on the party list)
5. VT: Believes in the right of a donor to a certain level of privacy
6. VT: Any legislative reform in this area comes up against the tension between transparency and the compliance burden, especially for small, volunteer parties; a tiered audit approach is needed
7. VT: an audit requirement for financial statements could lead to 'fudged' headings for accounts (such as 'contractors') to avoid disclosing specific details that other political parties would be aware of
8. VT: None of the current court cases appear to be inadvertent, but instead appear to be more due to more deliberate actions; there is a risk of a political response where something needs to be seen to be done

B. Comments on proposal #1 (lowering the threshold for political parties to disclose the identity of donors from \$15,000 to \$1,500)

9. VT: \$1,500 disclosure threshold sensible and proportionate in the candidate context, but making this the disclosure threshold for party donations could be distorting; it is a challenge for a new party to attract donors and this proposal would exacerbate those challenges; some donors may not have given money to SNZ if this proposal had been in force for the last general election
10. VT: SNZ spent approximately \$180,000 on its 2020 general election campaign, but it needed to spend at least \$1 million to gain enough traction to potentially enter Parliament
11. VT: SNZ content and marketing advisor said the engagement with SNZ content was good, but a bigger budget is needed to expand the content's reach to sufficiently have a chance of reaching the 5% party vote threshold
12. VT: A \$15,000 donation to a party is not big in the context of that level of election spending
13. VT: Confidentiality a big reason for donors to give money to small parties
14. VT: \$1,500 disclosure threshold for party donations is too low and will place small, emerging parties at a further disadvantage than what they already face

C. Comments on proposal #2 (increasing the frequency of reporting of donations by parties)

15. VT: Annual cost of donations return audit is approximately \$1,500; this is a non-trivial amount for a small party
16. VT: Because that \$1,500 is a fixed fee, if the frequency of reporting tripled, the cost of audits would also triple; this cost would be hard to cover in non-election years and would result in party funds being depleted purely to cover compliance costs before any opportunity to spend on reaching voters; this would be very hard for small parties
17. VT: A review of the current audit approach is worth looking at, but not sure what the levels/tiers could be
18. VT: Audit quality only as good as the information provided to the auditor, so fraudulent conduct is difficult to pick up in an audit; this means the audit has a negligible practical effect
19. VT: Party income is lumpy and generally comes in late in an election year (1-2 months before an election); if more frequent reporting came into force, there could be gaming by donors to avoid donating within reporting periods due immediately before an election

[see paragraphs 6 and 26 for other comments related to this proposal]

D. Comments on proposal #3 (removing the requirement that the identity of donors making donations over \$30,000 must be reported to the Electoral Commission within 10 days [alongside proposal 2])

20. VT: EC make this requirement very clear, although it can be difficult to keep track if a series of donations over a longer time period add up cumulatively to \$30,000
21. VT: Last-minute spending can dramatically affect undecided/swing voters, so relatively quick disclosure makes sense; but requirement is onerous and hard to manage; perhaps make it a 30-day reporting requirement instead of 10 days?
22. VT: None of the proposed changes address deliberate non-compliance but will increase burden on small parties

E. Comments on proposal #4 (requiring more detailed disclosures of in-kind (non-cash) donations)

23. VT: Neutral on this issue as it only affects big parties who run fundraisers and auctions etc.

F. Comments on proposal #5 (requiring disclosure of the volume and total dollar amount of donations under \$1,500)

24. VT: Neutral on this issue as well as this information is already collected, so as long as the reporting timeframe is reasonable, we have no issues

G. Comments on proposal #6 (requiring parties to release their audited annual financial statements, and simplifying the audit requirements to make audit reviews more meaningful)

25. VT: This requirement crosses over into parties disclosing commercial information
26. VT: An audit of financial statements will cost approximately \$3,000; add this to potentially more frequent donations reporting requiring audits along with the existing donations return audit and audit fees look likely to reach approximately \$10,000; this cost is likely to force the closure of small parties

[see paragraph 7 for other comments related to this proposal]

H. Comments on proposal #7 (introducing a requirement for candidates to disclose loans)

27. VT: Candidate loans can be quite personal, but should be disclosed on the Register of Pecuniary Interests for candidates who are elected to Parliament as MPs
28. VT: Loans to candidates who were not elected to Parliament are nobody else's business
29. VT: Most small parties have to focus on the party vote in any case given the unlikelihood of one of their candidates winning an electorate seat

I. General comments

30. VT: In the table attached to the Ministry's letter to party secretaries, under the 'Merits' column for Proposal #6, it states this proposal "aligns with similar obligations of other entities, such as charities and non-incorporated societies"; presumably this is a typo and is meant to refer to incorporated societies, rather than non-incorporated societies?
- a. AS: Agreed this appears to be a typo and is intended to refer to incorporated societies

Proactive Release

Submissions of the Sustainable New Zealand Party (SNZP) on Proposed Electoral Donations and Loans Rule Changes

1. *Introduction*

- 1.1. The Sustainable New Zealand Party (SNZP) was registered with the Electoral Commission on 4 December 2019. The party stood 11 candidates in the 2020 election.
- 1.2. Assuming the role of party secretary for a New Zealand political party is a daunting prospect. The obligations are significant and the liabilities for a secretary under the Electoral Act 1993 can be serious.
- 1.3. There is a clear public interest in improving transparency of donations and loans but this must be balanced against freedom of political expression, freedom of association and donors' right to privacy unless there is a clear public interest in disclosing their personal information.
- 1.4. As with all legislative reform in New Zealand care must be taken that rule changes aimed at the small number of major players in any realm do not create unsupportable obligations for the many smaller players. Some distinction between the compliance requirements for parties based on size and/or income, risk profiles, mitigations, etc. may be necessary.
- 1.5. The high-profile incidents referred to at paragraph 20 of the ministerial briefing paper of 5 August 2021 are either instances of a deliberate subversion of the existing rules or a failure to comply with the existing rules. Increasing the burden of compliance and requiring greater disclosure and audit will do little to capture those who are willing to falsify records to obtain their ends.
- 1.6. Specific submissions on the proposals are set out below:

2. *Lower public disclosure threshold for donations to \$1,500 for parties*

- 2.1. Start-up parties find it very difficult to attract substantial funding. Anonymity is highly important to donors.
- 2.2. In our own experience many larger donors (i.e. contributing between \$1,500-\$15,000) valued confidentiality. This is understandable when the media will seize upon any perceived connections between parties. Significant donors are likely to also donate to one of the major parties and unfair inferences may be drawn that the new party is therefore a 'prop' to the party with which they have a donor in common. These assertions are easy to make, impossible to counter and unfairly damaging.

- 2.3. A minor party, particularly a new one, will attract donations to the party rather than to individual candidates. Given that the rational strategy for a party that is unlikely to win an electorate is to focus on the party vote this makes the distinction between party and candidate contributions largely academic.
- 2.4. The ambiguity, possible incentives and need to interpret whether a donation is intended for a party or their candidate can be easily resolved by a party secretary or their agent.
- 2.5. The different disclosure thresholds for donations to candidates and parties have not caused significant confusion for SNZP. For most parties the distinction is not meaningful as the rational approach for a small party in an MMP system is generally to focus on the party vote. It is worth considering why the differential limits were set in the first place. The amounts of \$1,500 and \$15,000 are broadly equivalent in their context. A donation to a party is spent in a national context; a donation to candidate is spent only in their electorate. In terms of the relative impact (hence presumed influence of a donor) a donation and corresponding spend on candidate promotion of over \$1,500 in an electorate could be significant. In the context of a national party vote campaign \$1,500 is a small contribution.

3. *Increase frequency of donation reporting (e.g. from annual to 3- or 6-monthly)*

- 3.1. Donation reporting is already a significant obligation in terms of cost and effort expended.
- 3.2. For a small party the cost of auditing is a non-trivial proportion of its operating expenses. Notwithstanding the (generally) unpaid work within the party of collating information, the annual audit cost is ~\$1,500 for an audit. The professional fees for this work are a fixed cost that will not vary by the number of audits per year. The number of audits will simply multiply the audit fees per year. If a set of audited returns were required 4 times per year (i.e. every 3 months), the annual cost of audit would increase from \$1,500 to \$6,000. In a non-election year it is thus entirely possible that the cost of compliance will exceed donations received.
- 3.3. We echo the feedback of other party secretaries that the audit process needs to be analysed in terms of effectiveness, efficiency and appropriateness. As with any legislative reform a balance needs to be struck between the demands that can reasonably be placed on large parties with paid staff and sophisticated infrastructure and small entities run by volunteers dealing with much smaller amounts of money.
- 3.4. A sensible way to do this could be to have different return requirements for differently sized parties based on a party's total donations and loans in the last general election period. For instance, for National and Labour every 3

months, for ACT and the Greens every 6 months, for all other parties every 12 months. This would take account of their respective abilities to absorb the cost of audits and workload of compliance as well as corresponding to the relative public interest in transparency as between the parties. For a party like TOP that would be likely to raise a lot less in an election year compared to their last election year, provision could be made to apply to the Electoral Commission for a change in intervals based on a projection of income.

- 3.5. Ultimately, an audit is only as good as the information provided to the auditors. If the officials of a party are willing to commit deliberate breaches of electoral rules these are unlikely to be picked up in an audit as the same people will be providing the information to the auditor.
 - 3.6. More frequent intervals of reporting will create a new set of incentives for donors wishing to avoid closer scrutiny to donate in the period closest to the election and that will not be disclosed until after polling day. Given that the regulated period is 3 months before polling day, that the bulk of expenditure happens in the 1–2 months prior to an election, and that a large proportion of donations are received close to polling day in any event, this measure will do little to achieve the desired improvement in transparency while significantly increasing compliance effort and expense.
- 4. *Remove the requirement that for donations that exceed \$30,000 the identity of the donor amount must be publicly disclosed within 10 days of receipt***
- 4.1. This did not present an issue for the party in the lead-up to the 2020 election. We had a donation that exceeded \$30,000 and had no difficulty complying with the 10-day reporting requirement.
 - 4.2. However, in cases when multiple donations added up to exceed the limit inadvertently exceed the limit would be better dealt with by extending the reporting period. It is not clear why 10 days is meaningfully better than 30 days, for instance, which would make a significant difference in likelihood of avoiding inadvertent non-disclosure by allowing a more reasonable period for internal cross-checks.
 - 4.3. The splitting or channeling of donations to avoid disclosure is already prohibited under the Electoral Act 1993.
- 5. *Introduce requirements for parties and candidates to disclose more details about in-kind (i.e. non-cash) donations***
- 5.1. We are neutral on this proposal.

6. *Require parties and candidates to report on number and total volume of donations under \$1,500 for donations that are not made anonymously*

6.1. We are neutral on this proposal as the information is already collected and easily collated.

7. *Require parties to publicly disclose their audited annual financial statements*

7.1. This proposal goes well beyond the purported goal of these reforms of improving transparency of donations and loans and crosses into requiring the party to divulge detailed operational information.

7.2. Table 3 states that this will align parties with similar obligations of other entities such as charities and non-incorporated societies. This raises two issues:

(a) surely the reference is meant to be to incorporated societies as non-incorporated societies have no obligations outside those in their own rules whereas incorporated societies must comply with the requirements of the Incorporated Societies Act 1908 and – while section 23 requires that an annual financial statement is delivered to the Registrar of Incorporated Societies – the Act does not require that these statements are independently audited. Many incorporated societies have a provision in their rules not to require an audit of their financial statements on a vote of the members at a general meeting.

(b) The special legal status and tax-deductible status of donations to charities justify increased scrutiny. It is unclear how this analogy with political parties is justifiable.

7.3. The cost of audit is non-trivial. In concert with the increased costs of compliance discussed at 3.2 above, assuming costs of audit of between \$1,500 and \$3,000, a party could be expected to outlay in the vicinity of \$7,500–\$9,000 a year to meet bare compliance requirements. In a non-election year it is thus entirely possible that the cost of compliance will substantially exceed donations received. Some small parties may not be in a position to comply due to lack of funds.

8. *Introduce requirement for candidates to report on loans*

8.1. Loans taken by a candidate are a personal matter that they may not wish to be publicly disclosed.

8.2. In an MMP system the loans made to a party are of greater significance than loans made to an electorate candidate, warranting a higher standard of public disclosure.

Internal File Note

Author	Avi Singh, Policy Advisor	File reference TBC
Date	3:00pm to 4:00pm, Monday 13 December 2021	
Location	Microsoft Teams	
Subject	Proposed changes to political donations rules (meeting with The Opportunities Party – TOP)	
Participants	<u>MoJ</u> Craig McKendry, Policy Lead (CM) Avi Singh, Policy Advisor (AS)	<u>TOP</u> Ray McKeown, Party Secretary (RM)

- AS and CM met with RM, Party Secretary for The Opportunities Party (TOP). This internal file note briefly summarises the discussion.
- The discussion forms part of the Ministry of Justice's targeted consultation with the party secretaries of registered political parties to discuss the proposed changes to political donations rules, ahead of any potential legislative change in this area.

A. Introductory comments

- RM: Takes me around 40 hours to generate info from TOP's systems to prepare annual donations return (noted he works full-time so all time spent on this preparation is done voluntarily in the evenings)
- RM: I was an accountant and an auditor in a past life, so understand how those processes work
- RM: Audits of annual donations returns are a waste of time because qualified opinions are provided which add no economic, legal or democratic benefit; party secretaries are already on the hook legally anyway so qualified opinions do little
- RM: Audit of annual donations return currently costs ~\$3,500 - \$4,000 + GST, and this cost would increase substantially if more frequent donations reporting was required
- RM: Audited annual financial statements would be an even greater cost on top of the existing (pointless) audit requirements for annual donations returns
- RM: TOP uses a Customer Relationship Management (CRM) system which contains information about members and donors but has limited filtering ability; so a manual process is required to accurately assess the origin and total amount of donations received, and then report the required information in the format requested by the Electoral Commission (EC)

9. RM: At the moment, the donations TOP receives are too small to get close to most of the legal thresholds for disclosure

B. Comments on proposal #1 (lowering the threshold for political parties to disclose the identity of donors from \$15,000 to \$1,500)

10. RM: Proposal #1 makes sense from TOP perspective since they have to collect and calculate this information anyway to check what needs to be reported as a matter of law

C. Comments on proposal #2 (increasing the frequency of reporting of donations by parties)

11. RM: Estimates he would need to spend around 30 hours every quarter on donations reporting if reporting frequency became quarterly, so TOP would be worried about the significant increase in time required to achieve compliance

D. Comments on proposal #3 (removing the requirement that the identity of donors making donations over \$30,000 must be reported to the Electoral Commission within 10 days [alongside proposal 2])

12. RM: Makes sense to remove this requirement if proposal #2 went ahead; not sure about keeping the requirement only during the lead-up to a general election as he would not recommend having two separate reporting systems in place
13. RM: Removal of this requirement unlikely to be gamed since bad publicity afterwards would be big – but conversely, a party may have won an election by then so gaming the system could have significant consequences
14. RM: If keeping this requirement only for the lead-up to a general election, recommend increasing threshold for disclosure to \$50,000

E. Comments on proposal #4 (requiring more detailed disclosures of in-kind (non-cash) donations)

15. RM: Considers this a big problem – the amount disclosed should be the amount paid, and the name of both the buyer and the donor of the in-kind item should be disclosed
16. RM: Small parties are exposed in this regard e.g. if a hall is hired for a meeting at a local level and someone pays for the cost of renting it, it is very hard for the party secretary to know about all these little things that may be going on

F. Comments on proposal #5 (requiring disclosure of the volume and total dollar amount of donations under \$1,500)

17. RM: This is easy to implement as TOP collects this information already

G. Comments on proposal #6 (requiring parties to release their audited annual financial statements, and simplifying the audit requirements to make audit reviews more meaningful)

18. RM: We would be interested in what other parties do regarding audits

[see paragraph 7 for other comments related to this proposal]

H. Comments on proposal #7 (introducing a requirement for candidates to disclose loans)

19. RM: Never had to deal with this as most candidates personally pay their election expenses

I. Unspent donations

20. RM: This is not an issue for TOP

J. Anonymous donations

21. RM: Hard to assess if anonymous donations are from overseas or not; the issue from a public perspective is because anonymous donations can go to parties directly, rather than having to go through the EC

22. RM: Anonymous donations only being made through the EC protected disclosure channel would mean any risk of undue influence would dissipate since parties would not know the identity of the donor, and whether they were overseas or not wouldn't matter

23. RM: Would like to see thresholds for maximum donation amounts for overseas (\$50) and anonymous (\$1,500) donations aligned as the disparity makes it difficult to know if compliance is being achieved

24. RM: TOP has to manually try and match email addresses with names of people in its CRM system to ascertain donor identities since most donations are made online

K. General comments

25. RM: Feels like changes are being made to existing regime but what is the underlying problem? Are these proposed solutions actually going to solve the underlying issues?

Internal File Note

Author	Avi Singh, Policy Advisor	File reference TBC
Date	1:00pm to 2:00pm, Tuesday 18 January 2022	
Location	Teams	
Subject	Proposed changes to political donations rules (meeting with Chartered Accountants Australia and New Zealand – CAANZ)	
Participants	<u>MoJ / BDO</u> MoJ Craig McKendry, Policy Lead (CM) Avi Singh, Policy Advisor (AS) BDO s9(2)(a)	<u>CAANZ</u> Zowie Pateman, Deputy Leader – Reporting and Assurance (ZP) Amir Ghandar, Leader – Reporting and Assurance (AG)

1. AS, CM, ^{s9(2)(a)} and ^{s9(2)(a)} met with ZP and AG from CAANZ. This internal file note briefly summarises the discussion.
2. The discussion forms part of the Ministry of Justice’s targeted consultation with subject matter experts with specific expertise/interest to discuss the proposed changes to political donations rules, ahead of any potential legislative change in this area.
 - A. Comments on proposal #2 (increasing the frequency of reporting of donations by parties) and proposal #3 (removing the requirement that the identity of donors making donations over \$30,000 must be reported to the Electoral Commission within 10 days [alongside proposal 2])**
3. ZP: Not sure about increasing the reporting frequency of donations
 - B. Comments on proposal #4 (requiring more detailed disclosures of in-kind (non-cash) donations)**
4. ZP: Transparency of in-kind donations would be improved by requiring demarcation of reporting on return form

C. Comments on proposal #6 (requiring parties to release their audited annual financial statements, and simplifying the audit requirements to make audit reviews more meaningful)

5. ZP: Likely to be micro-entity exemption for incorporated societies to prepare general purpose financial statements (could cover 40% of incorporated societies)
 - a. ZP: Micro-entity likely to be under \$30,000 revenue
6. ^{s9(2)(a)}: Should political parties have to follow Public Benefit Entity (PBE) accounting reporting standards and Generally Accepted Accounting Practice (GAAP) going forward?
7. ZP: For reporting purposes, do parties prepare general purpose or special purpose statements?
 - a. ^{s9(2)(a)}: There is a mix; some parties specifically refer to the type of statements they will produce, but others do not
8. ZP: For charities, need to go through a process of consolidation to determine whether they fall into the Tier 4 (low-level payments around \$140,000) reporting category
9. AG: In Australia, parties follow a returns system with the Australian Electoral Commission (AEC)
 - a. AG: This is common across OECD countries
10. AG: Hard to get around the completeness of audit of donations returns issue through the reporting framework
11. ZP: Special purpose statements designed for specific users
12. ^{s9(2)(a)}: Need a common framework for financial statements for comparability; otherwise not necessarily achieving transparency objective
13. ^{s9(2)(a)}: Would negative assurance report help?
 - a. ^{s9(2)(a)}: Standard on Assurance Engagements (SAE) 3100 is the current standard for assurance reports
 - b. ZP: Electoral Commission does not specify if the assurance should be reasonable or limited
14. AG: Need to try and improve party procedures in terms of accounting controls etc. to have some better review reports
 - a. AG: But should not overpromise and then undermine trust and confidence when promises do not eventuate
15. ZP: Hard to see quick wins within this timeframe
 - a. ZP: Independent Review the main form to consider broader changes

BDO notes from meeting with Anthony Heffernan – External Reporting Board (XRB)
3.15pm – 4.15pm, Wednesday 26 January 2022 via Microsoft Teams

Attendees:

BDO

s9(2)(a)

MOJ

Craig McKendry, Policy Lead

XRB

Anthony Heffernan, Director Accounting Standards

Key takeaways we got from that meeting used to support our report were:

- Agreed with general purpose financial statements rather than special purpose
- In favour of financial statements being public and audited
- Expected there would need to be a 3-4 year transition period and suggested to look at the incorporated societies changes as an example
- Noted that if there was a requirement for political parties to comply with XRB standards that would then give the XRB scope to look at the standards to see if any changes are needed for donation disclosures. We have noted this in our report
- They agreed with the changes we were suggesting to the audit reports and made some suggestions which helped form what we have outlined in our report around the review and agreed upon procedures (AUP) options

Internal File Note

Author	Avi Singh, Policy Advisor	File reference TBC
Date	1:00pm to 2:00pm, Thursday 20 January 2022	
Location	Ministry of Justice	
Subject	Proposed changes to political donations rules (meeting with Jonathan Boston and Simon Chapple – Victoria University of Wellington)	
Participants	<u>MoJ</u> Hayley Denoual, Acting Policy Manager (HD) Craig McKendry, Policy Lead (CM) Avi Singh, Policy Advisor (AS)	<u>Victoria University of Wellington</u> Jonathan Boston, Chair + Professor of Public Policy, School of Government (JB) Simon Chapple, Director, Institute of Governance and Policy Studies, School of Government (SC)

- AS, CM and HD met with JB (Chair of, and Professor of Public Policy at, the School of Government) and SC (Director of the Institute of Governance and Policy Studies [IGPS] at the School of Government) from Victoria University of Wellington. This internal file note briefly summarises the discussion.
- The discussion forms part of the Ministry of Justice's targeted consultation with academics with specific expertise/interest to discuss the proposed changes to political donations rules, ahead of any potential legislative change in this area.

A. General comments

- HD: Gave overview of Independent Review of Electoral Law
- SC: Overall, the proposed changes are good moves in the right direction
- SC: Collective action solution – loss of donations for one political party likely to occur for all parties if there are to be any lost donations as a result of the proposed changes
- SC: Donations are not the only resource for parties; people are also resources
 - SC: Constraining donations makes people more valuable for parties to chase
- SC: Want parties to be as broadly based in the community as possible, rather than shells; so the more people, the better

8. SC: People over money and lots of little amounts of money sourced from broader community, not lots of big amounts of money sourced from very few people
9. SC: What resources can be given to parties to ease their compliance costs with increased transparency requirements?
 - a. SC: There is a public benefit with transparency, so public funding for technological support is warranted
10. SC: Structure and content of publicly disclosed financial statements is key for proposal #6, especially for comparability across parties and across time
11. JB: Most people could not donate more than \$1,000
 - a. SC: A majority of people from the IGPS survey support disclosing the names of donors of amounts under \$1,000
12. SC: Membership fee could be used as a loophole for anonymous donations to parties
 - a. HD: Are different / greater membership fees inherently wrong? Could they be legitimate depending on the circumstances?
 - b. JB / SC: What do people on average donate to charities? That could show the average amount people should donate to parties, and if the average party donation is well above that, this could indicate there should be disclosure of donations of lower amounts
13. JB: Need to make sure in-kind donations do not become a loophole to avoid disclosure thresholds
14. SC: Frequency of donation reporting is not so important, because the public is unlikely to look every quarter to see what donations have been reported
15. SC: Reporting requirements should not be a barrier to entry for smaller or emerging parties

Internal File Note

Author	Avi Singh, Policy Advisor	File reference TBC
Date	10:00am to 11:00am, Wednesday 12 January 2022	
Location	Zoom	
Subject	Proposed changes to political donations rules (meeting with Andrew Geddis – University of Otago)	
Participants	<u>MoJ</u> Hayley Denoual, Acting Policy Manager (HD) Craig McKendry, Policy Lead (CM) Avi Singh, Policy Advisor (AS)	<u>University of Otago</u> Andrew Geddis, Professor, Faculty of Law (AG)

1. AS, CM and HD met with AG, Professor in the Faculty of Law at the University of Otago. This internal file note briefly summarises the discussion.
2. The discussion forms part of the Ministry of Justice's targeted consultation with academics with specific expertise/interest to discuss the proposed changes to political donations rules, ahead of any potential legislative change in this area.
 - A. Comments on proposal #1 (lowering the threshold for political parties to disclose the identity of donors from \$15,000 to \$1,500)**
3. AG: Can see how having one consistent disclosure threshold for both parties and candidates makes sense
4. AG: One threshold takes away the potential to channel candidate donations through the party, and protects the integrity of the candidate donation disclosure regime
5. AG: \$1,500 disclosure threshold for party donations would also likely prevent donation splitting because it would be much harder with the lower threshold, and would only result in the disclosure of approximately 200-300 additional donations each by National and Labour
6. AG: However, a low threshold is likely to capture donations unlikely to be exerting the kind of potential undue influence the public is concerned about / the donations disclosure regime is attempting to mitigate against
7. AG: The worry of political parties being corrupted by donations is relatively low even if the party donation disclosure threshold was \$5,000, let alone \$1,500

8. AG: Potential worries about less privacy for smaller donors due to the lowering of the party donation disclosure threshold are diluted due to the much greater quantity of donor names that would be disclosed, compared to the relatively small quantity of donor names that are disclosed right now
9. AG: Ultimately, striking the balance between privacy and transparency is key

B. Comments on proposal #2 (increasing the frequency of reporting of donations by parties) and proposal #3 (removing the requirement that the identity of donors making donations over \$30,000 must be reported to the Electoral Commission within 10 days [alongside proposal 2])

10. AG: Quarterly reporting and a requirement for donation disclosure either before election day or the start of the advance voting period would mean the 10-day reporting requirement would no longer be needed
11. HD: 3- or 6-monthly reporting are the most likely intervals that would be implemented given accounting and financial reporting cycles and GST return deadlines etc.
12. AG: Generally it is viewed as important that the public know who has donated to which candidate / party before an election
13. AG: Does the public disclosure of donor names and amounts influence voters? Probably not, but could theoretically be an issue in the future
14. AG: Political parties seem to think voters could be influenced by donation disclosures though; a potential example is how one of the major parties appeared to go to great lengths to attempt to (legally) avoid disclosing the identity of its donors in an incident currently before the courts
15. AG: 10-day rule seems to have been hard for parties to comply with because it requires them to disclose donations above \$30,000 over a rolling 12-month period
16. AG: The Electoral Commission appears very forgiving of parties who fail to comply with the 10-day rule, meaning the rule is seen to lack teeth
17. AG: Do late donations actually help parties, given the planning and payment of costs for an election campaign usually have to happen well before the regulated pre-election period begins?
18. AG: How should promises (not necessarily fulfilled) to donate or loan money be reported? This is quite challenging

C. Comments on proposal #4 (requiring more detailed disclosures of in-kind (non-cash) donations)

19. AG: Would define a donation as a gift of money or something of value, unless the party is selling something it has owned for some time (e.g. three years, being one general election cycle) for a fair value

20. AG: Hard to quantify the value of access to political leaders at dinners, as opposed to the actual costs incurred in providing the dinner; therefore, access to a political leader should not be considered to have a market value
21. HD: Could be argued that the public is more interested in who attends a dinner, rather than who pays for it
22. AG: The question of who attends, rather than pays for, a dinner potentially starts to stray from donations law into more general lobbying disclosure rules; need to try as much as possible not to use donations law to regulate matters that are not strictly about donations
23. AG: The media is a potential check on the kind of undue influence that could be exerted by people who attend, rather than pay for, a dinner

D. Comments on proposal #5 (requiring disclosure of the volume and total dollar amount of donations under \$1,500)

24. AG: In principle, no reason why this proposal should not be implemented

E. Comments on proposal #6 (requiring parties to release their audited annual financial statements, and simplifying the audit requirements to make audit reviews more meaningful)

25. AG: Comfortable with the proposition that political parties' financial reporting obligations should be substantively similar to those faced by charities
26. AG: The nature of bodies aiming for public betterment (and take money to attempt to do so) means society has an interest in how that money comes in and what it's used for
27. AG: Political parties are deeply enmeshed in public life to the extent where they have a significant influence and impact on people's lives
28. AG: Parliamentary parties also receive public money through the election broadcasting allocation, so it is difficult to claim they are operating as purely private membership-based entities like they perhaps once were
29. HD: Is there a risk to parties of showing how they receive donations and operate to spend them through the disclosure of their financial statements?
 - a. AG: Parties can turn their financial statement disclosure to their advantage, either by showing how healthy they are financially and how this shows they are worth joining and capable of running the country, or by showing how they are not influenced at all by any third parties and operate for the people's benefit
30. AG: Increased transparency should be the main aim of disclosing financial statements, not just seeking to follow where potential influences on parties are coming from

F. Comments on proposal #7 (introducing a requirement for candidates to disclose loans)

- 31. AG: No strong view, but implementing this proposal would appear to make sense
- 32. HD: Difficulty is in determining what constitutes a loan for the purposes of the Electoral Act loan disclosure regime – not interested in candidate’s personal loans for personal property or personal credit cards, but interested in loans that would aid them in paying for the cost of running an election campaign
- 33. AG: Definitional question for loan raises similar issues that trying to define what a donation is does

G. Anonymous donations

- 34. AG: Do we really care about the identity of donors of amounts under \$1,500? Potential for particularly negative consequences of disclosure in relation to parties’ grassroots retail activities, such as raffles and bake sales
- 35. AG: Anonymity is also important for donors who do not want to be continually chased by parties to donate them money
- 36. AS: Would this issue of avoiding being regularly solicited not be addressed through the Privacy Act requiring parties to stop soliciting former donors once asked to?
 - a. AG: Annoyance of regular solicitation unlikely to rise to a level warranting someone seeking legal intervention to prevent it; more likely to remain a practical annoyance
- 37. AG: Protected disclosure regime seems quite complex for small (e.g. \$50) donations
- 38. HD: A \$50 *de minimis* for anonymous donations would align with the overseas donations *de minimis*
- 39. AG: Alignment makes sense, even if the current *de minimis* thresholds may not be appropriate

Internal File Note

Author	Avi Singh, Policy Advisor	File reference TBC
Date	11:00am to 12:00pm, Thursday 20 January 2022	
Location	Ministry of Justice	
Subject	Proposed changes to political donations rules (meeting with Timothy Kuhner – University of Auckland)	
Participants	<u>MoJ</u> Hayley Denoual, Acting Policy Manager (HD) Craig McKendry, Policy Lead (CM) Avi Singh, Policy Advisor (AS)	<u>University of Auckland</u> Timothy Kuhner, Associate Professor, Auckland Law School (TK)

1. AS, CM and HD met with TK, Associate Professor in the Auckland Law School at the University of Auckland. This internal file note briefly summarises the discussion.
2. The discussion forms part of the Ministry of Justice's targeted consultation with academics with specific expertise/interest to discuss the proposed changes to political donations rules, ahead of any potential legislative change in this area.

A. General comments

3. TK: Interested in Independent Review of Electoral Law and their stakeholder engagement process
4. TK: Is proposal #3 dependent on proposal #2?
 - a. HD: Yes
5. TK: This package of reforms is the perfect response to the political donations scandals covered recently in the media, given the breadth of parties involved (even though the people involved probably knew what they were doing)
6. TK: Communication of changes is key, but it seems good that the Labour Party is not just disadvantaging its competitors
7. TK: These are important changes to challenge public cynicism
8. TK: Anonymous ballot not synonymous with anonymity of financial donations
 - a. HD: Could donor behaviour change?
 - b. TK: Hard to know, but needs to be considered in context of economic inequality

9. TK: Is it a bad thing if some donors become hesitant? This is a question about trade-offs
10. TK: At what level should there not be a right to donor privacy?
 - a. TK: In terms of disposable income, \$15,000 seems a high threshold to reach before public disclosure is required
 - b. TK: Openness is not just about donor participation, but also about people's equal right to participate in democracy
 - c. TK: Higher donations could also overshadow smaller donations and discourage those people making smaller donations from participating in our democracy?
11. TK: Increase the enforcement powers and budget of the Electoral Commission, New Zealand Police, and Serious Fraud Office (SFO) to help enforce political donations laws as a response to the recent scandals?
12. TK: SFO argues it is underfunded relative to equivalent international agencies
13. TK: Political parties are private bodies exercising public functions essential to democracy
14. TK: On this basis, making political parties' financial information available is key to informing voters, especially given the difficulty running as an independent candidate
 - a. AS: Excluding candidates transitioning between political party affiliations (such as Winston Peters when he won the 1993 Tauranga by-election), the last time an independent candidate won an electorate seat in New Zealand was in 1943
15. TK: Lower the threshold for anonymous donations, although \$1,500 does not seem exceptionally problematic aside from the unequal (as opposed to undue) influence it allows
16. TK: Less than 1% of the electorate in the United States of America gives 66% of election funds
 - a. TK: Donation caps are one possible option
17. TK: Rollout of changes is really important to help set the stage for compliance, give tools to help achieve compliance, and also allow fair enforcement
 - a. TK: Perhaps academics such as Andrew Geddis and myself could, on a *pro bono* basis, help educate political parties and candidates about the changes to the rules, and how to comply with them?
18. TK: I have received a Marsden Fund grant for political finance research with a New Zealand case study
 - a. TK: I would be interested to interface with the secretariat of the Independent Review of Electoral Law about my work