

T:D 102
2018-08/004

August 3, 2018

Ministry of Business
Innovation & Employment
Wellington 6011
By email: corporate.law@mbie.govt.nz

Tēnā koutou

Increasing the Transparency of the Beneficial Ownership of New Zealand Companies and Limited Partnerships

The New Zealand Nurses Organisation *Tōpūtanga Tapuhi Kaitiaki o Aotearoa* (NZNO) takes this opportunity to comment briefly on the above discussion document. NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand, representing over 52, 000 members, ie over half the regulated health workforce and about 5% of women voters. Whilst business and financial regulation is outside our scope of expertise, the impact of globalisation, financial and market deregulation and the influence of multinational corporations on public health systems and equity (which underpins health) is not. We therefore welcome moves to increase transparency with regard to the people who benefit from ownership of companies and limited partnerships, but are concerned that the narrow scope of discussion and options significantly weaken the potential impact of regulation to improve transparency and accountability. In particular, we recommend that tax avoidance be considered as alongside money laundering etc as criminal misuse and that the proposed regulations apply to Trusts as well.

Like many who submitted on the recent Tax Review, NZNO's submission¹ advocated for taxation that is fair (to both Tiriti partners) ie all income is taxed, redistributive, gathers sufficient revenue to support adequate investment in public goods and services, and is transparent and accountable. It is quite clear from the evidence referred to in the discussion document and elsewhere² that various financial instruments including offshoring, cost shifting etc are being used by 'legitimate' companies to avoid taxation and externalise costs, thus placing an ever greater burden on wage earners to meet not only the infrastructural costs of a functioning social democracy, but also the environmental and health costs of unsustainable production

¹ NZNO submission to the Tax Working Group, (April, 2018).
https://www.nzno.org.nz/Portals/0/Files/Documents/Activities/Submissions/1_2018-04%20Tax%20Review_NZNO.pdf

² See for instance [Tax Justice Network https://www.taxjustice.net/](https://www.taxjustice.net/), [Public Service International](#) and various publications such as

practices. We consider that tax avoidance, “which played a key part in generation the recent and global financial crisis”³ is inherently fraudulent and criminal, and should be a focus of any regulation developed to identify the individuals profiting from such financial transactions. Public and media access to information which allows the interrogation of the movement of money in the public interest is key to the protection of a viable democracy.

NZNO supports Option three, but suggests that to be truly effective, regulatory requirements pertaining to the ownership of companies and limited partnerships must also apply to Trusts, assure public access to required information, and that the scope should be widened to identify those who benefit from tax avoidance.

Nāku noa nā
29(1)(a)

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³ Richard Brooks – Nicholas Shaxson *Treasure Islands: Tax havens and the men who stole the world*, (2nd Ed) Vintage Press.(Chat 12)