

# Submission

to the

Ministry of Business,  
Innovation and Employment

on the

Review of Section 36 of the  
Commerce Act and Other  
Matters

29 March 2019

## About NZBA

1. NZBA works on behalf of the New Zealand banking industry in conjunction with its member banks. NZBA develops and promotes policy outcomes that contribute to a strong and stable banking system that benefits New Zealanders and the New Zealand economy.
2. The following seventeen registered banks in New Zealand are members of NZBA:
  - ANZ Bank New Zealand Limited
  - ASB Bank Limited
  - Bank of China (NZ) Limited
  - Bank of New Zealand
  - MUFG Bank, Ltd
  - China Construction Bank
  - Citibank, N.A.
  - The Co-operative Bank Limited
  - Heartland Bank Limited
  - The Hongkong and Shanghai Banking Corporation Limited
  - Industrial and Commercial Bank of China (New Zealand) Limited
  - JPMorgan Chase Bank, N.A.
  - Kiwibank Limited
  - Rabobank New Zealand Limited
  - SBS Bank
  - TSB Bank Limited
  - Westpac New Zealand Limited

## Background

3. NZBA welcomes the opportunity to provide additional feedback to the Ministry of Business, Innovation and Employment (**MBIE**) on its discussion paper: *Review of s 36 of the Commerce Act and Other Matters (Discussion Paper)*.
4. If you would like to discuss any aspect of the submission further, please contact:

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## NZBA notes and reiterates earlier submissions on proposal to amend s 36 of the Commerce Act 1986

5. On 21 July 2016 NZBA submitted on MBIE's cross-submission consultation: *Targeted Review of the Commerce Act 1986*. That submission can be found [here](#).
6. NZBA continues to share the views expressed by ANZ in its submission dated 9 February 2016 on MBIE's earlier consultation: *Targeted Review of the Commerce Act 1986*. That submission can be found [here](#).