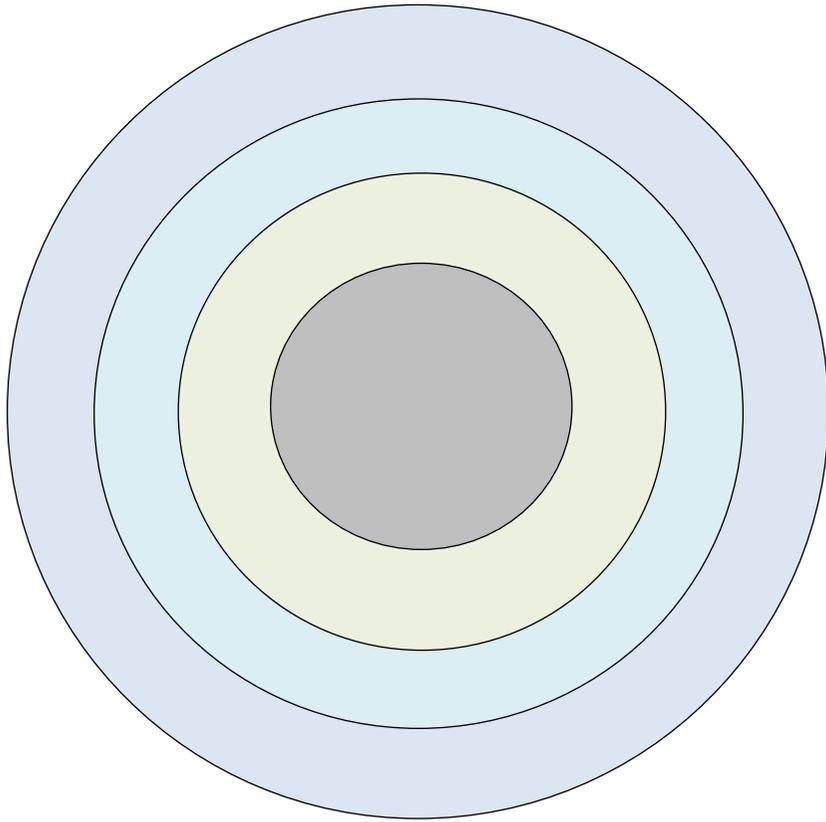


NZBA Priority	
	High
	Medium
	Low

- Current Priorities:**
- Covid-19 response
 - Financial Markets (Conduct of Institutions) Amendment Bill
 - Review of the RBNZ Act
 - Review of Capital Adequacy Framework
 - Credit Contracts Legislation Amendment Act
 - Open data
 - Sustainability and climate change

Regulatory Radar – Key



The location of the item in the diagram indicates how far progressed the policy is. At the outer rim it indicates initial scoping. In the centre it indicates that it is being implemented.

NZBA Priority	
	High
	Medium
	Low



NZBA Priority measure is based on:

- the significance of the impact that the proposals would have on industry; and
- the priority accorded to the work by the Government or relevant agency.

Current Key Priorities lists the priority work areas for NZBA.

Relevant agencies	
MBIE	Ministry of Business, Innovation and Employment
RBNZ	Reserve Bank of New Zealand
IRD	Inland Revenue Department
MoJ	Ministry of Justice
FMA	Financial Markets Authority
LINZ	Land Information New Zealand
MSD	Ministry of Social Development
DIA	Department of Internal Affairs
MfE	Ministry for the Environment

Project	Priority	Lead agency	Comment	Next Steps
Covid-19 response	High	n/a	<p>In March 2020, NZBA announced that its retail members had offered to defer repayments on residential mortgages for up to six months for customers financially affected by Covid-19. This meant that affected customers did not have to make principal and interest payments on their loans. Banks also offered affected customers the option to go interest only, or to extend the term of their loan. Their credit rating was not affected by the deferral, provided they were not in arrears before the pandemic. This scheme was in addition to what banks are doing individually to assist affected customers.</p> <p>In August 2020, NZBA worked with MBIE and RBNZ on an extension to the scheme, meaning that some customers were eligible for a new loan deferral for up to six months or an extension to their existing loan deferral (up to 31 March 2021). NZBA's media release is here.</p> <p>In April 2020, NZBA announced \$6.25 billion in new lending available to Covid-19 affected businesses through the Business Finance Guarantee Scheme (BFGS). NZBA worked with Treasury on significant changes to the BFGS, including extending the maximum loan amount from \$500,000 to \$5 million, and the loan term from three to five years.</p> <p>In December 2020, the Minister of Finance announced that the BFGS had been extended to June 2021. Applications for new loans under the scheme ended on 30 June 2021.</p> <p>The loan deferral scheme ended on 31 March 2021.</p>	<p>In 2021 and 2022, NZBA will continue to work with key stakeholders to support New Zealanders financially affected by Covid-19.</p> <p>NZBA is also working with government on its various Covid-related initiatives as they impact the banking industry.</p>
Financial Markets (Conduct of Institutions) Amendment Bill	High	MBIE/FMA	<p>In January 2019 the Ministers of Finance and Commerce and Consumer Affairs announced that the Government would introduce a suite of measures to address gaps in the regulation of financial service providers' conduct.</p>	<p>MBIE is considering whether to make changes to the Bill through the remaining parliamentary</p>

Project	Priority	Lead agency	Comment	Next Steps
			<p>On 30 April 2019 MBIE published the options paper: Conduct of Financial Institutions. The paper proposed a range of options to ensure that conduct and culture in the financial services sector is delivering good outcomes for all customers. NZBA’s submission on the options paper is here.</p> <p>In September 2019 Minister Faafoi announced a new regime to regulate the conduct of financial institutions. The measures the Government is introducing include:</p> <ul style="list-style-type: none"> • A new conduct licensing system for banks, insurers and non-bank deposit takers such as credit unions. • A new regime requiring these entities to meet high standards of customer treatment. • A ban on incentives which are based on meeting sales targets. <p>In December 2019 the Financial Markets (Conduct of Institutions) Amendment Bill (CoFI) was introduced into Parliament.</p> <p>The Bill had its first reading in February 2020 and was referred to the Finance and Expenditure Committee.</p> <p>In June 2020, NZBA appeared in front of the Finance and Expenditure Committee in support of its submission.</p> <p>In August 2020, the Finance and Expenditure Committee published its report on the Bill. The Committee recommended that the Bill be passed with amendments, many of which NZBA advocated for, including:</p> <ul style="list-style-type: none"> • Providing for a maximum transition period of three years rather than two. • Providing for a statutory review of the regime to ensure that it does not create issues in its interaction with other regulatory regimes. 	<p>stages, in particular around the treatment of intermediaries.</p> <p>MBIE expects the Bill to be passed and regulations finalised by the first half of 2022, with all obligations in the Bill and regulations in force by the end of 2024.</p>

Project	Priority	Lead agency	Comment	Next Steps
			<ul style="list-style-type: none"> • Providing more clarity about the fair conduct principle by inserting a list of factors that are relevant to the concept of fairness. • Amending the provision requiring that financial institutions make their fair conduct programme publicly available. <p>MBIE released two discussion documents in March 2021, one on the regulations to support the Bill, and the other on the treatment of intermediaries under the Bill. NZBA’s submission on these documents can be found here.</p> <p>In October 2021 the FMA released a discussion document: “2021 Review of the Financial Markets Authority Funding and Levy”. This document included proposals around the funding of FMA’s approach to regulating CoFI, and CoFI implementation. NZBA made an industry submission on this consultation, which can be found here.</p>	
Review of the RBNZ Act	High	Treasury	<p>In November 2017 the Government announced it would undertake a review of the Reserve Bank of New Zealand Act 1989 to create a modern monetary and financial policy framework. The review is being undertaken in two phases.</p> <p>Phase Two involves a comprehensive review of the financial policy provisions of the Act that provide the legislative basis for prudential regulation and supervision. It is also reviewing the broader governance arrangements for RBNZ, including the respective roles of the Board and Governor.</p> <p>The first of the Phase Two consultations – Reserve Bank Act Review: Safeguarding the future of our financial system – was published in November 2018. In February 2019 NZBA submitted on that consultation, and Treasury published a report summarising the key messages and themes emerging from the submissions received.</p>	The Government is intending the deposit protection scheme to “go live” around mid-late 2023.

Project	Priority	Lead agency	Comment	Next Steps
			<p>The second of the Phase Two consultations was published in June 2019. That included a number of in-principle decisions and topics for consultation. NZBA submitted in August 2019.</p> <p>In December 2019 Finance Minister Grant Robertson announced the following further Cabinet decisions:</p> <ul style="list-style-type: none"> • Greater powers to monitor banks and hold directors and executives more accountable for their actions. • Introducing deposit insurance of \$50,000 per customer, per institution. We note that since these decisions were released, further Cabinet decisions have been made which amend the deposit insurance limit to \$100,000 per customer (see further comment below). • A Governance Board to oversee financial stability matters. • A Financial Policy Remit will set out matters the Board must have regard to when pursuing RBNZ’s financial stability objectives. • Measures to increase transparency at RBNZ, including more oversight for the Auditor-General and the Ombudsman. • RBNZ will be given the ability to restore solvency or to recapitalise a failed deposit taker by writing down or converting to equity unsecured liabilities (statutory ‘bail-in’). <p>The third of the Phase Two consultations was published in March 2020. It focused on the design of the new prudential framework for deposit takers and the deposit insurance scheme. NZBA’s submission on the consultation is here. Treasury has published submissions it received on this consultation here.</p> <p>The changes will be implemented through a Deposit Takers Bill (which will govern RBNZ’s regulatory powers) and the Reserve Bank of New</p>	

Project	Priority	Lead agency	Comment	Next Steps
			<p>Zealand Bill (which outlines how RBNZ is governed and how it operates).</p> <p>In April 2021, the government announced further details of the Deposit Takers Bill, including:</p> <ul style="list-style-type: none"> • A deposit guarantee scheme which would protect deposits of up to \$100,000 per depositor, per financial institution, in the event of failure. This scheme will be fully funded by levies on member institutions. • A new process for setting lending restrictions such as loan-to-value ratios. This will give the Minister of Finance a role in determining which types of lending the Reserve Bank is able to directly restrict. <p>The Reserve Bank of New Zealand Bill received Royal Assent on 16 August 2021.</p> <p>The Reserve Bank released an exposure draft of the Deposit Takers Bill on 6 December 2021, which can be found here. NZBA will make an industry submission on the exposure draft. Submissions are due by 21 February 2022. The Bill reflects the following policy developed since the April 2021 Cabinet decisions:</p> <ul style="list-style-type: none"> • Substantial detail on resolution powers and ‘No Creditor Worse Off’ provisions, • A decision to not implement statutory bail-in at this time. 	
Review of Capital Adequacy Framework	High	RBNZ	<p>The aim of the review was to ensure that New Zealand has a capital regime that provides a high level of confidence in the solvency of the banking system, while avoiding unnecessary economic inefficiency.</p> <p>In December 2019 RBNZ announced its final decisions on the capital review, which included:</p>	<p>RBNZ has released an updated Capital Review Implementation Timeline. Implementation of new capital rules began on 1 October 2021, with</p>

Project	Priority	Lead agency	Comment	Next Steps
			<ul style="list-style-type: none"> total capital increasing from a minimum of 10.5% now, to 18% for the four large banks and 16% for the remaining smaller banks; the inclusion of AT1 instruments as part of the capital stack; and a transition period of 7 years (rather than 5 years). <p>NZBA's media release on RBNZ's decisions is here.</p> <p>In November 2020, RBNZ announced a further delay in the start of increases in bank capital until 2022 to allow banks continued headroom to respond to the effects of the COVID-19 pandemic and to support economic recovery. The changes mean the increase in the Prudential Capital Buffer will not begin until July 2022. In November 2020, RBNZ began consulting on the details for implementing the final capital review decisions. NZBA's submission on the consultation can be found here.</p> <p>Some of the most significant changes in the consultation include implementing the new rules for capital instruments, and consulting about the RBNZ's response if a bank does not meet capital buffer requirements.</p> <p>The Reserve Bank published its finalised bank capital adequacy requirements on 17 June 2021, outlined in the Banking Prudential Requirements documents.</p>	increases in minimum requirements starting in July 2022.
Credit Contracts Legislation Amendment Act	High	MBIE	<p>The first tranche of regulations relating to the Credit Contracts Legislation Amendment Act were made in August 2020 – the Credit Contracts and Consumer Finance Amendment Regulations 2020.</p> <p>They relate to:</p> <ul style="list-style-type: none"> responsible advertising standards for lenders; the information to be disclosed at the start of debt collection; disclosure requirements when a contract has been varied; and 	<p>The new Responsible Lending Code can be found here.</p> <p>NZBA is continuing to engage with MBIE and the Commerce Commission in relation to the</p>

Project	Priority	Lead agency	Comment	Next Steps
			<ul style="list-style-type: none"> amendments to existing regulations relating to disclosure of information about dispute resolution services and financial mentoring services. <p>The second tranche of regulations were made in December 2020 – the Credit Contracts and Consumer Finance (Lender Inquiries into Suitability and Affordability) Amendment Regulations 2020. They relate to:</p> <ul style="list-style-type: none"> requirements to keep records of affordability and suitability assessments, and how fees are calculated; providing disclosure to borrowers in languages used in advertising language; providing information about disputes resolution schemes and financial mentoring services; requirement for creditors and mobile traders to be certified; regulations setting minimum requirements for affordability, suitability, responsible advertising, debt collection disclosure; and duties on directors and senior managers. <p>The Commerce Commission published draft guidance on the due diligence duties for directors and senior managers of lenders in March 2021. NZBA’s submission on the guidance can be found here. Final guidance was published in early June 2021 and can be found here.</p> <p>The new regulations and most remaining provisions of the Credit Contracts Legislation Amendment Act came into force on 1 December 2021, as did most changes to the Responsible Lending Code. The changes to Chapter 12 of the Responsible Lending Code are due to come into force on 1 February 2022.</p>	implementation of this legislation.
Open data	High	MBIE	In March 2018, Payments NZ (PNZ) announced an API pilot involving banks, payment providers and large retailers. The pilot tested two API	The Government is aiming to make a second round of

Project	Priority	Lead agency	Comment	Next Steps
			<p>standards – Account Information and Payment Initiation – and provided valuable insights into the design of a shared API framework.</p> <p>Following the success of the pilot, an API standards service was launched to the industry in May 2019. The API standards service is an industry-led body responsible for defining roles, governance, minimum standards and API specifications. It has now been transitioned to the API Centre for ongoing management and governance.</p> <p>The API Centre coordinates the ongoing development, management and governance of payment-related API standards and provides supporting services. It is industry led and designed to respond to market needs. Further information regarding the API Centre can be found here.</p> <p>The focus is now on banks continuing to make their APIs available to, and entering into the due diligence and commercial process with, users.</p> <p>In December 2019, the Minister of Commerce and Consumer Affairs wrote to the banks that are involved in the Payments NZ API project, setting out his views on the project and open banking generally. The letter acknowledges progress to date, concerns about certain areas and outlines some expectations to ensure good progress is continued.</p> <p>On 5 August 2020, MBIE published a discussion document seeking feedback on options for establishing a consumer data right in New Zealand. NZBA’s submission on the discussion document is here.</p> <p>In July 2021, the Minister of Commerce and Consumer Affairs announced the Government’s decision to establish a consumer data right framework for New Zealand. The consumer data right will be</p>	<p>policy decisions on the consumer data right framework in late 2021 and will look to introduce legislation in 2022.</p>

Project	Priority	Lead agency	Comment	Next Steps
			rolled out on a sector-by-sector basis. Officials have not yet decided which sectors will come first.	
Sustainability and climate change	High	Multiple agencies	<p>Risks around sustainability and climate change are significant and evolving quickly. NZBA sees these as likely to have an effect on New Zealand's economy.</p> <p>RBNZ has published a climate change strategy here and its 2021 report on its climate change strategy and related work here.</p> <p>In October 2019 NZBA submitted on FMA's consultation paper: Proposed guidance on green bonds and other responsible investment products. The consultation sought feedback on how green bonds and other responsible investment products should be described, labelled and promoted to investors.</p> <p>In November 2019 the Ministry for the Environment began consultation on climate-related financial disclosures: Understanding your business risks and opportunities related to climate change. It sets out proposals for a mandatory principles-based, climate-related financial disclosures regime.</p> <p>In December 2019 NZBA submitted on the Ministry for the Environment's discussion document supporting the adoption of the recommendations by the Taskforce on Climate-related Financial Disclosures.</p> <p>In September 2020, the Government announced that it will introduce mandatory climate-related financial disclosure requirements. The new disclosure regime will require annual disclosure of financially material climate-related risks and opportunities in mainstream financial reports, such as annual reports. It will apply to:</p>	The XRB intends to release a second consultation on "Strategy & Metrics" and "Targets" in March 2022, before releasing a full draft standard informed by feedback on the first two consultations. NZBA will continue to engage with XRB throughout this period.

Project	Priority	Lead agency	Comment	Next Steps
			<ul style="list-style-type: none"> • registered banks, credit unions, and building societies with total assets of more than \$1 billion; • managers of registered investment schemes with greater than \$1 billion in total assets under management; • licensed insurers with greater than \$1 billion in total assets under management or annual premium income greater than \$250 million • equity and debt issuers listed on the NZX; and • crown financial institutions with assets greater than \$1 billion assets under management. <p>The Financial Sector (Climate-related Disclosures and Other Matters) Amendment Bill had its introduction and first reading in April 2021. The Bill is largely consistent with what the Government had previously signalled. The detail of disclosures will be based on the XRB Climate Standards, which are in the process of being developed.</p> <p>The Bill was referred to the Economic Development, Science and Innovation Committee. NZBA made a written submission which can be found here, which formed the basis of NZBA’s oral submission to the Committee on 24 June 2021. The Committee released its report on 16 August 2021. Key recommendations include:</p> <ul style="list-style-type: none"> • exclusion of small, listed issuers (under \$60 million market capitalisation) from the definition of climate reporting entity; • delay of implementation of assurance requirements for a further two years; • removal of disclose or explain provisions. <p>It appears that the earliest date disclosures will be required is FY 2022 – 2023. The Bill received Royal Assent on 27 October 2021.</p> <p>The Climate Change Commission released its final recommendations to the Government in June 2021.</p>	

Project	Priority	Lead agency	Comment	Next Steps
			<p>The XRB opened its first consultation on the climate reporting standards in October 2021. This consultation covered the “Governance” and “Risk Management” components of the standards. NZBA made an industry submission on this consultation, which can be found here.</p> <p>The FMA’s funding and levy review discussion paper (discussed above in relation to CoFI) also included discussion on funding of the FMA’s role as the regulator of climate-related disclosures.</p> <p>NZBA made a submission on MfE’s Discussion Document: Transitioning to a low-emissions and climate-resilient future in November 2021. The submission can be found here.</p>	
RBNZ Macro-prudential Policy	Medium	RBNZ	<p>Finance Minister Grant Robertson and the RBNZ have updated the Memorandum of Understanding on macro-prudential policy to add debt serviceability tools. The RBNZ has consulted on a proposal to further reduce the amount of high Loan-to-Value Ratio (LVR) lending to owner-occupiers. Following consultation, the RBNZ has decided to restrict the amount of lending banks do above an LVR of 80% to 10% of all new loans (down from the current 20%).</p> <p>The RBNZ opened a consultation on the implementation of:</p> <ul style="list-style-type: none"> • Debt-to-Income (DTI) restrictions – which impose a cap on debt as a multiple of a borrower’s income, and • Interest rate floors - on the test interest rates used by banks in their serviceability assessments of borrowers. 	The new LVR requirements apply from 1 November 2021.
AML/CFT	Medium	MoJ	<p>Four sets of amendment regulations were made for the anti-money laundering and countering financing of terrorism (AML/CFT) regime on 8 June 2021. These came into force on 9 July 2021. The RBNZ, FMA and DIA have announced a transitional compliance period from 9 July</p>	Submissions on the statutory review of the

Project	Priority	Lead agency	Comment	Next Steps
			<p>2021 until 29 April 2022, during which their efforts will be focused on assisting compliance, and raising awareness and understanding of the new regulations.</p> <p>The key changes are:</p> <ul style="list-style-type: none"> • Expanded customer due diligence (CDD) obligations where nominee directors, nominee shareholders or nominee general partners are involved (including enhanced CDD for companies with nominee directors). • Longer time periods for audits and risk assessments of AML/CFT programmes. • Amendments to a range of exemptions and definitions. <p>The FMA, RBNZ and DIA recently issued new guidance regarding identity verification. The first is an updated explanatory note to the Amended Identity Verification Code of Practice 2013. The second is a factsheet relating to birth certificates with redacted information.</p> <p>In early October, MoJ released a consultation paper on the statutory review of the Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT Act). The paper covers a broad range of topics, and can be found here. NZBA is preparing an industry submission on this consultation.</p>	AML/CFT Act closed on 6 December 2021.
Financial Services Legislation Amendment Act and Regulations	Medium	MBIE	<p>The Financial Services Legislation Amendment Act 2019 passed its third reading and received Royal Assent in April 2019.</p> <p>In May 2019 the Code of Professional Conduct for Financial Advice Services was approved by the Minister for Commerce and Consumer Affairs.</p>	As of 16 March 2021, anyone applying for a FAP licence must apply for a full licence. The FMA has released target application dates for each class of FAP licence. The target date for Class 3 FAP licence

Project	Priority	Lead agency	Comment	Next Steps
			<p>The Financial Markets Conduct (Regulated Financial Advice Disclosure) Amendment Regulations 2020 were made in June 2020.</p> <p>In November 2020, the FMA confirmed the standard conditions for full Financial Advice Provider (FAP) licences, and the three classes of service.</p> <p>The new financial advice regime started on 15 March 2021. The new Code of Professional Conduct for Financial Advice Services also came into force on 15 March 2021.</p>	applications is 30 June 2022.
Merchant service fees	Medium	MBIE	<p>In September 2020, the Labour Party committed to tightening regulations around merchant service fees charged by banks to retailers and other small businesses if re-elected. This was subsequently confirmed as a Government priority in the Speech from the Throne.</p> <p>In December 2020, MBIE released an issues paper testing its understanding of the issues related to high merchant service fees in New Zealand and gathering information about possible options to remedy those issues.</p> <p>NZBA made a submission on MBIE's consultation in February 2021.</p> <p>On 12 May 2021 Commerce and Consumer Affairs Minister David Clark announced the Government's next steps in relation to merchant service fees, including the development of a Retail Payment System Bill to:</p> <ul style="list-style-type: none"> • Require reductions in interchange fees, including a 0.8% cap on interchange fees for credit card transactions and 0.6% for online debit card transactions. • Enable direct intervention by the Commerce Commission using a broad suite of powers to regulate different participants in the retail payments system. 	The Select Committee report on the Retail Payment System Bill is due on 3 March 2022.

Project	Priority	Lead agency	Comment	Next Steps
			<ul style="list-style-type: none"> Introduce a disclosure and reporting requirement to enable the Commerce Commission to monitor the retail payments system. <p>The Retail Payment System Bill was introduced to Parliament on 11 October 2021 and has been referred to the Economic Development, Science and Innovation Select Committee. The Bill appears to be broadly as signalled by Minister Clark on 12 May 2021. NZBA made a written submission to the Select Committee in November 2021.</p>	
Financial Inclusion	Medium	MBIE and MSD	<p>The Safer Credit and Financial Inclusion Strategy (SCAFI) was launched in September 2019. The Strategy is a collaborative initiative between government, the financial services industry and community sector. Its vision is that ‘people and whānau can meet their needs and achieve their aspirations, free from problem debt’.</p> <p>In September 2021, MSD, MBIE and the Retirement Commission brought the SCAFI work under Te Ara Ahunga Ora Retirement Commission’s 2021 National Strategy for Financial Capability He Rautaki-ā-motu mō te Āheitanga Ahumoni.</p> <p>SCAFI’s three goals directly support and align with the National Strategy’s goal of demystifying money, as financially capable behaviours are influenced by the design and accessibility of financial products, services and support.</p>	There will be two meetings per year for the National Strategy for Financial Capability.
Future of Money	Medium	RBNZ	<p>The Future of Money – Te Moni Anamata – is considering the implications for New Zealanders of falling cash use for every-day transactions, including the impacts on the system that supplies, moves and stores it.</p>	NZBA will prepare industry submissions on the Future of Money consultations.

Project	Priority	Lead agency	Comment	Next Steps
			<p>RBNZ consulted on the implications of a contracting cash network in the issues paper: The future of cash use – Te whakamahinga moni anamata.</p> <p>Respondents to the issues paper submitted that cash has an important role in society and, although cash use is declining, some New Zealanders are still heavily reliant on cash, and many want to maintain the option to use cash alongside other means of payment.</p> <p>Following that, RBNZ published a consultation paper which proposed that the RBNZ take on a more active monitoring and coordination role in the cash system, and be given appropriate information-gathering powers to support this role.</p> <p>In November 2019 NZBA submitted on RBNZ’s consultation paper: <i>The future of the cash system – Te pūnaha moni anamata</i>.</p> <p>In early October 2021, the RBNZ released two consultation papers under its Future of Money project, one focusing on Stewardship, and one focusing on a Central Bank Digital Currency. These consultations closed on 6 December 2021. RBNZ released a further consultation on 30 November 2021 outlining options for cash system reform.</p>	
RBNZ Other	Medium	RBNZ	<p><i>RBNZ Enforcement Framework Consultation</i></p> <p>The RBNZ released a consultation paper on its proposed enforcement framework in October 2021. NZBA’s submission can be found here.</p> <p><i>RBNZ Branch Review Consultation</i></p> <p>The RBNZ is reviewing its policy for branches of overseas banks. It released a consultation paper in October 2021, with submissions due on 2 March 2022. The paper can be found here.</p>	

Project	Priority	Lead agency	Comment	Next Steps
			<p><i>RBNZ Review of Connected Exposures Policy (BS8) for Banks</i></p> <p>The RBNZ is reviewing its Connected Exposures Policy for locally incorporated banks. The key proposals are to align the Connected Exposures Policy with the existing capital adequacy framework and to respond to a recommendation from the International Monetary Fund’s Financial Sector Assessment Programme review in 2017. Submissions are due on 31 March 2022. The consultation paper can be found here.</p>	
Digital Identity Trust Framework	Medium	DIA	<p>In July 2020, Cabinet agreed to establish the Digital Identity Trust Framework in legislation. In February 2021, Cabinet approved policy proposals that underpin the Digital Identity Trust Framework, including the establishment of an Accreditation Authority and Governance Board.</p> <p>In September 2021, the Digital Identity Services Trust Framework Bill was introduced to Parliament. It was referred to Economic Development, Science and Innovation Committee, with submissions to the Select Committee due 2 December. NZBA’s submission on the Bill can be found here.</p>	
Mortgage Bond Collateral Standards Review	Low	RBNZ	<p>On 17 November 2017 RBNZ published a consultation paper proposing an enhanced mortgage bond standard aimed at supporting confidence and liquidity in the financial system. The consultation paper can be found here. A summary of submission can be found here.</p> <p>On 13 November 2018 RBNZ published an exposure draft of its policy Residential Mortgage Obligations (RMO) - Introducing a high grade residential mortgage backed securities framework for New Zealand. This followed an initial consultation in November 2017 and ongoing discussion with issuers and investors over 2018.</p> <p>RBNZ has published a summary of submissions, on its website. RBNZ is working to finalise the policy framework and will agree an</p>	As a result of Covid-19, the Mortgage Bond Collateral Standards Review has been deferred.

Project	Priority	Lead agency	Comment	Next Steps
			implementation plan for the RMO standard through working groups covering three key areas – loan level data, operational implementation and legislative processes.	
Beneficial Ownership of New Zealand Companies and Limited Partnerships	Low	MBIE	<p>On 19 June 2018, MBIE released a discussion document seeking feedback on what requirements there should be on New Zealand companies and limited partnerships to hold and disclose information about their beneficial owners: Increasing the transparency of the beneficial ownership of New Zealand Companies and Limited Partnerships.</p> <p>On 2 August 2018 NZBA submitted on MBIE’s discussion paper on beneficial ownership.</p>	Decisions are expected in 2021/2022.
Review of s 36 of the Commerce Act	Low	MBIE	<p>In January 2019 MBIE released a discussion paper seeking feedback on a proposal to amend the Commerce Act’s prohibition against anti-competitive unilateral conduct (s 36) in line with Australian reforms: Review of Section 36 of the Commerce Act and other matters.</p> <p>That discussion paper follows MBIE’s targeted review and cross-submission consultation on the same issue in November 2015 and July 2016, respectively.</p> <p>In March 2019 NZBA submitted on MBIE’s discussion paper.</p> <p>The Government has agreed to amendments to section 36 of the Commerce Act 1986.</p> <p>Other amendments to the Commerce Act will include:</p> <ul style="list-style-type: none"> • Removing provisions that shield some types of intellectual property-related conduct from being examined under competition law. • Increasing penalties for businesses engaging in anti-competitive mergers. 	The Commerce Amendment Bill was introduced on 10 March 2021 and had its first reading on 16 March 2021. The Select Committee report was published on 14 September 2021 and can be found here .

Project	Priority	Lead agency	Comment	Next Steps
			<ul style="list-style-type: none"> • Technical changes to the treatment of anti-competitive covenants. • Increasing the maximum number of Commerce Commissioners from six to eight to reflect the Commission’s growing responsibilities in recent years. • Making it easier for the Commerce Commission to cooperate with other domestic agencies by sharing information it holds, subject to appropriate safeguards. 	