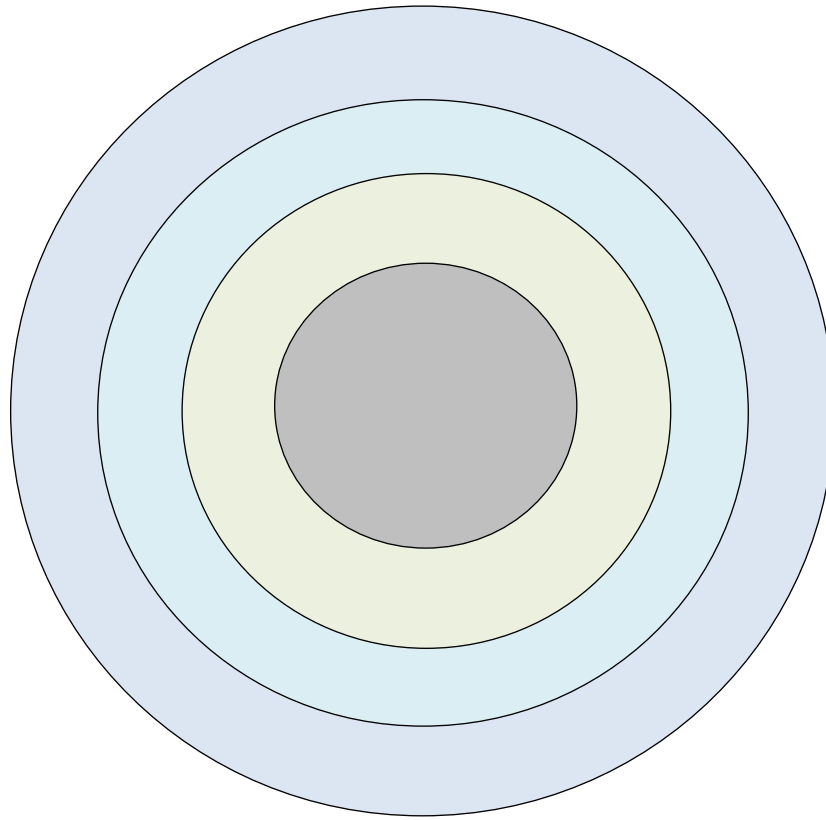


# Regulatory Radar – Key



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:

- Conduct and Culture Review
- Review of the RBNZ Act
- Review of Capital Adequacy Framework
- Credit Contracts Legislation Amendment Bill
- Open Banking
- Sustainability and climate change

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

Project	Priority	Lead agency	Comment	Next Steps
Financial Markets (Conduct of Institutions) Amendment Bill	High	MBIE/FMA	<p>In January 2019 the Ministers of Finance and Commerce and Consumer Affairs <a href="#">announced</a> that the Government would introduce a suite of measures to address gaps in the regulation of financial service providers' conduct.</p> <p>On 30 April 2019 MBIE published the options paper: <a href="#">Conduct of Financial Institutions</a>. The paper proposed a range of options to ensure that conduct and culture in the financial sector is delivering good outcomes for all customers. NZBA's submission on the options paper is <a href="#">here</a>.</p> <p>In June 2019 the regulators <a href="#">confirmed</a> that all retail banks had committed to remove sales incentives for frontline staff and their managers no later than the first performance year beginning after 30 September 2019.</p> <p>In September 2019 Minister Faafoi <a href="#">announced</a> a new regime to regulate the conduct of financial institutions. The measures the Government is introducing include:</p> <ul style="list-style-type: none"> <li>• A new conduct licensing system for banks, insurers and non-bank deposit takers such as credit unions.</li> <li>• A new regime requiring these entities to meet high standards of customer treatment.</li> <li>• A ban on incentives which are based on meeting sales targets.</li> </ul>	<p>In December 2019 the <a href="#">Financial Markets (Conduct of Institutions) Amendment Bill</a> was introduced into Parliament.</p> <p>The Bill is expected to have its first reading in early 2020 and will then be referred to Select Committee.</p> <p>Regulations will also be necessary to support the operation of the licensing regime and incentives prohibitions. Those regulations will be developed following a further policy and consultation process.</p>
Review of the RBNZ Act	High	Treasury	<p>In November 2017 the Government <a href="#">announced</a> 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>In December 2019 Finance Minister Grant Robertson <a href="#">announced</a> the following further Cabinet decisions:</p> <ul style="list-style-type: none"> <li>• Greater powers to monitor banks and hold</li> </ul>

Project	Priority	Lead agency	Comment	Next Steps
			<p>Phase One involved a review of monetary policy, culminating in the <a href="#">Reserve Bank of New Zealand (Monetary Policy) Amendment Act 2018</a>.</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 – <a href="#">Reserve Bank Act Review: Safeguarding the future of our financial system</a> – was published in November 2018. In February 2019 NZBA <a href="#">submitted</a> on that consultation.</p> <p>In February 2019 Treasury <a href="#">published</a> a report summarising the key messages and themes emerging from the submissions received.</p> <p>The second round of Phase Two consultations was <a href="#">published</a> in June 2019. That included a number of in-principle decisions and topics for consultation. In August 2019 NZBA <a href="#">submitted</a> on the second round of the Phase Two consultation.</p>	<p>directors and executives more accountable for their actions.</p> <ul style="list-style-type: none"> <li>• Introducing deposit insurance of \$50,000 per institution.</li> <li>• A Governance Board to oversee financial stability matters.</li> <li>• A Financial Policy Remit will set out matters the Board must have regard to when pursuing RBNZ's financial stability objectives.</li> <li>• Measures to increase transparency at RBNZ, including more oversight for the Auditor-General and the Ombudsman.</li> <li>• 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').</li> </ul>

Project	Priority	Lead agency	Comment	Next Steps
				The changes will be implemented through a Deposit Takers Act (which will govern RBNZ's regulatory powers) and an Institutional Act (which will outline how RBNZ is governed and how it operates). The Institutional Act will be introduced in mid-2020. Final policy decisions on the Deposit Takers Act and the deposit insurance scheme are expected in mid-2020 following further consultation.
Review of Capital Adequacy Framework	High	RBNZ	<p>The aim of the review is 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 May 2017 RBNZ released an <a href="#">issues paper</a> to provide stakeholders with the opportunity to give initial feedback on the intended scope of the review, and issues that might warrant attention. NZBA's submission is <a href="#">here</a>.</p> <p>In July 2017 RBNZ opened consultation on what type of financial instruments should qualify as bank capital. The <a href="#">issues and options paper</a> set out proposed reforms, with the aim of reducing the complexity of the regulatory regime, providing greater certainty about</p>	<p>In December 2019 RBNZ <a href="#">announced</a> its <a href="#">final decisions</a> on the capital review, which included:</p> <ul style="list-style-type: none"> <li>total capital increasing from a minimum of 10.5% now, to 18% for the four large banks and 16% for the remaining smaller banks;</li> </ul>

Project	Priority	Lead agency	Comment	Next Steps
			<p>the quality of capital that banks hold, and reducing the scope for regulatory arbitrage. NZBA's submission is <a href="#">here</a>.</p> <p>In November 2017 NZBA <a href="#">published</a> an analysis of the international comparability of the capital ratios of New Zealand's major banks.</p> <p>In December 2017 RBNZ sought feedback on the options for calculating risk weighted assets: <a href="#">Calculation of Risk Weighted Assets</a>. NZBA's submission is <a href="#">here</a>.</p> <p>In July 2018 RBNZ published its <a href="#">response to submissions on the calculation of risk weighted assets</a>.</p> <p>On 14 December 2018 RBNZ published <a href="#">Capital Review Paper 4: How much capital is enough?</a></p> <p>In May 2019 NZBA <a href="#">submitted</a> on Capital Review Paper 4, recommending that RBNZ:</p> <ul style="list-style-type: none"> <li>• reduce the total capital requirement;</li> <li>• allow a more diverse range of capital instruments; and</li> <li>• create a more realistic transitional framework.</li> </ul> <p>NZBA also commissioned two pieces of research:</p> <ul style="list-style-type: none"> <li>• An <a href="#">independent economic review</a>, undertaken by former Treasury secretary Dr Graham Scott.</li> <li>• An updated <a href="#">review of the international comparability of the capital ratios of New Zealand's major banks</a>, undertaken by PwC.</li> </ul> <p>In June 2019 RBNZ <a href="#">published</a> the submissions received on Capital Review Paper 4.</p> <p>In May 2019, RBNZ commissioned three <a href="#">external experts</a> to independently review the analysis and advice underpinning the capital review proposals. The Terms of Reference for that review can be</p>	<ul style="list-style-type: none"> <li>• the inclusion of AT1 instruments as part of the capital stack; and</li> <li>• a transition period of 7 years (rather than 5 years).</li> </ul> <p>NZBA's media release on RBNZ's decisions is <a href="#">here</a>.</p> <p>In 2020 NZBA will continue to work with RBNZ on the detail and implementation of its decisions.</p>

Project	Priority	Lead agency	Comment	Next Steps
			<p>found <a href="#">here</a>. In June and July 2019 NZBA and Dr Graham Scott met with the external experts as part of their independent reviews.</p> <p>In September 2019 RBNZ <a href="#">published</a> the three external expert reports, along with a <a href="#">summary</a> of their findings.</p>	
Credit Contracts Legislation Amendment Act	High	MBIE	<p>In June 2018 MBIE released a <a href="#">discussion document</a> seeking feedback on a review of New Zealand's consumer credit regulation. On 1 August 2018 NZBA <a href="#">submitted</a> on MBIE's discussion document.</p> <p>In June 2018 <a href="#">Cabinet issued its decision</a> on s 99(1A) of the Credit Contracts and Consumer Finance Act 2003 (CCCFA) and recommended that changes be included in the legislation resulting from the review of consumer credit regulation.</p> <p>In October 2018 the Minister for Commerce and Consumer Affairs released his <a href="#">policy decisions</a> on the CCCFA review.</p> <p>In April 2019 the <a href="#">Credit Contracts Legislation Amendment Bill</a> was introduced into Parliament and referred to the Finance and Expenditure Committee.</p> <p>NZBA made a <a href="#">submission</a> to the Finance and Expenditure Committee on the Bill in June 2019 and appeared before the Committee in support of its submission in July 2019.</p> <p>In September 2019, following public feedback on the Bill at Select Committee, the Minister for Commerce and Consumer Affairs <a href="#">announced</a> that the Bill would also include a 0.8% per day cap on interest rates, in addition to other changes which will strengthen protections for vulnerable borrowers.</p>	<p>In December 2019 the <a href="#">Credit Contracts Legislation Amendment Act</a> passed its third reading and received Royal Assent.</p> <p>In 2020 NZBA will continue to work with MBIE on the development of regulations around affordability and suitability assessments, and responsible advertising.</p>



Project	Priority	Lead agency	Comment	Next Steps
			<p>The Finance and Expenditure Committee <a href="#">reported back</a> on the Bill in November 2019. The Committee recommended several changes to the Bill, including:</p> <ul style="list-style-type: none"> <li>• Introducing an interest and fees rate cap of 0.8 per cent per day for high-cost consumer credit contracts.</li> <li>• New restrictions on providing repeated high-cost consumer credit contracts, and providing high-cost consumer credit contracts to borrowers who already have a high-cost consumer credit contract.</li> <li>• Treating contracts entered into by mobile traders as consumer credit contracts.</li> <li>• Requiring the disclosure of contact details for the MoneyTalks service to be provided to borrowers who have been declined by a high-cost lender, made a hardship application or received an overdue payment reminders.</li> <li>• Requiring lenders to provide statistical information about their business to the Commerce Commission on an annual basis, to improve monitoring and enforcement.</li> </ul> <p>NZBA is also a member of the Responsible Lending Code Advisory Group, facilitated by MBIE. In 2020 the Advisory group will review the Responsible Lending Code in light of the new legislation.</p>	
Open Banking	High	MBIE	<p>On 8 September 2017 MBIE published the cabinet paper – <a href="#">Retail payment systems: update on next steps</a> – which formed the basis of the Minister of Commerce and Consumer Affairs’ (then, Hon Jacqui Dean) letter to industry participants setting out her expectations regarding the future directions of the payments system.</p> <p>The cabinet paper identifies open banking as being a key issue internationally, and considers that industry-led open banking initiatives</p>	<p>The focus is now on banks making 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</p>



Project	Priority	Lead agency	Comment	Next Steps
			<p>would be likely to result in favourable competitive pressures and reduce the need for regulatory action.</p> <p>In March 2018, Payments NZ (<b>PNZ</b>) launched an API pilot involving banks, payment providers and large retailers. The pilot provided valuable insights into the design of a shared API framework and will inform the debate around what open banking means for New Zealand. Further details about the pilot can be found <a href="#">here</a>.</p> <p>On 26 June 2018 the Minister of Commerce and Consumer Affairs <a href="#">gave a speech at the Payments NZ Conference</a> in which he encouraged the progression of the API framework (in particular, with respect to access and use by third-parties) within the next year.</p> <p>The API service was successfully launched to the industry on 23 May 2019. The Minister for Commerce and Consumer Affairs spoke at the launch and, in his address to attendees, congratulated the industry for reaching this milestone but reiterated in the coming months his expectations for the industry:</p> <ul style="list-style-type: none"> <li>• all major banks participating in the API Centre and working with third parties;</li> <li>• broad participation from across the ecosystem, with transparent and affordable commercial terms; and</li> <li>• as much standardisation as possible in terms of APIs used and access to them.</li> </ul> <p>The API service has been transitioned to the API Centre for ongoing management and governance. Further information regarding the API Centre can be found <a href="#">here</a>.</p>	<p>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. The letter also indicates that in 2020 MBIE will start work looking at a possible Consumer Data Right regime in New Zealand.</p>

Project	Priority	Lead agency	Comment	Next Steps
Sustainability and climate change	High	Multiple agencies	<p>Risks around sustainability and climate change are significant and evolving quickly. NZBA sees these are likely to have an effect on New Zealand's economy.</p> <p>RBNZ has published a climate change strategy <a href="#">here</a>.</p> <p>In October 2019 NZBA <a href="#">submitted</a> on FMA's consultation paper: <a href="#">Proposed guidance on green bonds and other responsible investment products</a>. 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: <a href="#">Understanding your business risks and opportunities related to climate change</a>. It sets out proposals for a mandatory principles-based, climate-related financial disclosures regime.</p>	<p>In December 2019 NZBA <a href="#">submitted</a> 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 early-2020 NZBA will meet with the newly formed Climate Change Commission.</p>
Financial Services Legislation Amendment Act and Regulations	Medium	MBIE	<p>The <a href="#">Financial Services Legislation Amendment Act 2019</a> passed its third reading and received Royal Assent in April 2019.</p> <p>NZBA has submitted on the following discussion papers in relation to the Act:</p> <ul style="list-style-type: none"> <li>• New disclosure requirements for those providing financial advice. NZBA's submission can be found <a href="#">here</a>.</li> <li>• Regulations to support measures in the Bill relating to misuse of the Financial Service Providers Register. NZBA's submission can be found <a href="#">here</a>.</li> <li>• Financial advice provider licensing fees and changes to the FMA levy. NZBA's submission can be found <a href="#">here</a>.</li> </ul>	<p>In November NZBA <a href="#">submitted</a> on MBIE's draft Financial Markets Conduct (Regulated Financial Advice Disclosure) Amendment Regulations.</p> <p>FMA started accepting transitional licence applications from 4 November 2019 and the Government has set 29 June 2020 as the start date for the new regime.</p>

Project	Priority	Lead agency	Comment	Next Steps
			<ul style="list-style-type: none"> <li>Proposed standard conditions for transitional licensees under the new financial advice regime. NZBA's submission can be found <a href="#">here</a>.</li> </ul> <p>In May 2019 the <a href="#">Code of Professional Conduct for Financial Advice Services</a> was approved by the Minister for Commerce and Consumer Affairs.</p> <p>In September 2019 NZBA submitted on the wording of the exclusion for advice given to comply with lender responsibilities.</p>	
Complaints Dashboard	Medium	Banking Ombudsman Scheme	<p>RBNZ and FMA, in the findings of their review of banks' conduct and culture in November 2018, noted that banks, regulators and the wider industry should have a view of the issues that cause complaints, and how widespread these are, including the insights from complaints that can improve customer outcomes.</p> <p>The Banking Ombudsman Scheme (<b>BOS</b>) has since begun development of an industry-wide complaints dashboard.</p> <p>All members involved in the Conduct and Culture Review have agreed with, and are contributing to, this initiative and it is being carried out in consultation with FMA and RBNZ.</p> <p>The intention is to release the Dashboard in three stages over six months:</p> <ul style="list-style-type: none"> <li>Stage 1, December 2019: an initial Dashboard based on 12 data items.</li> <li>Stage 2, February 2020: add a further 10 data items.</li> <li>Stage 3, May 2020: add a further 12 data items.</li> </ul>	BOS is currently working with banks on Stage 1 of the Dashboard; an initial Dashboard based on 12 data items.

Project	Priority	Lead agency	Comment	Next Steps
Future of cash	Medium	RBNZ	<p>The Future of Cash – 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> <p>RBNZ consulted on the implications of a contracting cash network in the issues paper: <a href="#">The future of cash use – Te whakamahinga moni anamata</a>.</p> <p><a href="#">Respondents</a> 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 <a href="#">consultation paper</a> 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>	In November 2019 NZBA <a href="#">submitted</a> on RBNZ's consultation paper: <i>The future of the cash system – Te pūnaha moni anamata</i> .
Privacy Bill	Medium	MoJ	<p>The <a href="#">Privacy Bill</a> was introduced into Parliament on 20 March 2018 and had its first reading on 11 April 2018, following which it was referred to the Justice Committee.</p> <p>NZBA <a href="#">submitted</a> to the Justice Committee on 7 June 2018 and appeared before the Committee in support of its submission on 6 September 2018.</p> <p>The Committee reported back to the House on 13 March 2019. The final report can be found <a href="#">here</a>.</p> <p>The Committee made four key recommendations:</p> <ul style="list-style-type: none"> <li>• That the Bill applies to any actions taken by (i) a New Zealand agency (whether inside or outside New Zealand); and/or (ii) an overseas agency carrying on business in New Zealand, in respect</li> </ul>	The Bill passed its second reading on 7 August 2019 and will now proceed to the Committee of whole House.

Project	Priority	Lead agency	Comment	Next Steps
			<p>of all personal information collected or held by that agency in the course of carrying on business in New Zealand.</p> <ul style="list-style-type: none"> <li>Retention of the requirement that agencies remain accountable for personal information, where that information is subsequently held by another agency for safe custody or processing.</li> <li>Increasing the reporting threshold from “harm” to “serious harm” to help reduce the risk of over reporting, provide more certainty to agencies and better align the Bill with overseas jurisdictions.</li> <li>A requirement that the Commissioner publishes details of compliance notices (including the identity of the agency), unless it would cause the agency undue harm that outweighs the public interest.</li> </ul>	
Farm Debt Mediation Act	Medium	Ministry for Primary Industries	<p>In December 2018 <a href="#">Cabinet gave policy approval</a> to establish a statutory scheme for the mediation of farm debt in New Zealand. The proposed scheme would require secured creditors to farm businesses to offer statutory mediation before taking any enforcement action in relation to debt held over that business. It would also allow for farmers to initiate statutory mediation with a secured creditor.</p> <p>In May 2019, NZBA provided feedback to MPI as part of a targeted consultation on the proposed Government Bill.</p> <p>The <a href="#">Farm Debt Mediation Bill (No.2)</a> was introduced into Parliament on 18 June 2019 and had its first reading on 27 June 2019.</p> <p>In August 2019 NZBA made a <a href="#">submission</a> on, and appeared in support of, the Bill at the Primary Production Committee.</p> <p>In October 2019, the Primary Production Committee <a href="#">reported back</a> on the Bill and made a number of recommendations:</p> <ul style="list-style-type: none"> <li>Clarification of some key terms.</li> </ul>	In December 2019 The <a href="#">Farm Debt Mediation Act</a> passed its third reading and received Royal Assent.

Project	Priority	Lead agency	Comment	Next Steps
			<ul style="list-style-type: none"> <li>• Initiation of mediation before a farmer is in default.</li> <li>• Position of guarantors.</li> <li>• Multi-party mediation.</li> <li>• Costs of mediation.</li> <li>• Confidentiality.</li> <li>• Situations of urgency.</li> <li>• Duration of mediation.</li> </ul>	
Financial Action Task Force Mutual Evaluation (AML/CFT)	Medium	RBNZ	<p>In March 2020, New Zealand will be subject to an international review (the <b>Mutual Evaluation</b>) to assess its level of compliance against international anti-money laundering and countering financing of terrorism (<b>AML/CFT</b>) standards (more commonly known as the Financial Action Task Force Recommendations).</p> <p>The Mutual Evaluation will have two primary focuses, firstly, does New Zealand's legal framework meet the international AML/CFT standards and secondly, how well does New Zealand's AML/CFT system operate in practice. The banking sector will be a major component of the Mutual Evaluation. The final report and ratings are expected to be published by the end of 2020.</p>	Members and RBNZ will continue to work closely to prepare for the evaluation.
Protecting Business and Consumers from Unfair Commercial Practices	Medium	MBIE	<p>On 10 December 2018, MBIE released a discussion paper seeking feedback on whether there is a need for additional protections for businesses and consumers against unfair commercial practices: <a href="#">Protecting businesses and consumers from unfair commercial practices</a>.</p> <p>MBIE has published the submissions received on the consultation <a href="#">here</a>.</p> <p>In September 2019 the Ministers for Commerce and Consumer Affairs and Small Business <a href="#">announced</a> measures to address unfair conduct across the economy, and unfair business-to-business contracts:</p>	<p>In December 2019 the <a href="#">Fair Trading Amendment Bill</a> was introduced into Parliament.</p> <p>The Bill is expected to have its first reading in early 2020 and will then be referred to Select Committee.</p>

Project	Priority	Lead agency	Comment	Next Steps
			<ul style="list-style-type: none"> <li>Prohibiting conduct that is 'unconscionable' – this is serious misconduct that goes far beyond being commercially necessary or appropriate.</li> <li>Extending current protections against unfair contract terms in standard form consumer contracts to apply to business contracts with a value below \$250,000 as well.</li> </ul>	
Beneficial Ownership of New Zealand Companies and Limited Partnerships	Medium	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: <a href="#">Increasing the transparency of the beneficial ownership of New Zealand Companies and Limited Partnerships</a>.</p> <p>On 2 August 2018 NZBA <a href="#">submitted</a> on MBIE's discussion paper on beneficial ownership.</p>	Decisions are expected in 2020.
Automatic Exchange of Information/ Common Reporting Standard (AEOI/CRS)	Medium	IRD	In June 2018 NZBA issued media releases on the freezing/closure of bank accounts, in line with AEOI requirements. Those media releases can be found <a href="#">here</a> and <a href="#">here</a> .	NZBA will continue to engage with IRD during the reporting periods to help ensure industry concerns and suggestions on implementation are taken on-board.
Public disclosure of bank breaches of regulatory requirements	Medium	RBNZ	<p>In October 2018 RBNZ published a consultation paper proposing changes to the reporting and publishing of regulatory breaches by banks: <a href="#">Public and private reporting by banks of breaches of regulatory requirements, with consideration of materiality</a>.</p> <p>One of the conclusions of the Regulatory Stocktake, and following the development of the Bank Financial Strength Dashboard, was that</p>	RBNZ is consulting on changes necessary to implement the new regime, which is expected to come into force on 1 April 2020.



Project	Priority	Lead agency	Comment	Next Steps
			<p>banks should be formally required to notify RBNZ of any breaches of their conditions of registration, and that RBNZ should draw on that reporting to publish collated information on bank breaches on a dedicated new page on its website. This consultation paper sought views on the proposed mechanism for putting that conclusion into effect, as well as the option of applying a materiality threshold to the publication of breaches.</p> <p>NZBA <a href="#">submitted</a> on RBNZ's consultation in December 2018 and in June 2019 industry participated in an RBNZ workshop on the proposals.</p> <p>In September 2019 RBNZ published a <a href="#">summary of submissions and final policy decisions</a> on the reporting and publishing of breaches by banks. The new policy will require a bank to report promptly to RBNZ when there is a breach or possible breach of a requirement in a material manner, and report all minor breaches every six months. Only actual material breaches will then be published on RBNZ's website.</p>	
Review of Mortgage Bond Collateral Standards	Medium	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 <a href="#">here</a>. A summary of submission can be found <a href="#">here</a>.</p> <p>On 13 November 2018 RBNZ published an exposure draft of its policy <a href="#">Residential Mortgage Obligations (RMO) - Introducing a high grade residential mortgage backed securities framework for New Zealand</a>. This followed an initial consultation in November 2017 and ongoing discussion with issuers and investors over 2018.</p>	RBNZ has now published submissions and a <a href="#">summary of submissions</a> , on its website. RBNZ is working to finalise the policy framework and will agree an implementation plan for the RMO standard through working groups covering three key areas – loan level data, operational

Project	Priority	Lead agency	Comment	Next Steps
				implementation and legislative processes.
Overseas Investment Act Review	Low	Treasury	<p>In October 2018 Treasury <a href="#">announced</a> that the Government would undertake a further review of the Overseas Investment Act 2005. The Terms of Reference can be found <a href="#">here</a>.</p> <p>In April 2019 Treasury launched its public consultation document on the second phase of its Overseas Investment Act 2005 reforms. It is focused on ensuring New Zealand remains an attractive destination for high-quality productive overseas investment and ensuring such investments are in the national interest.</p> <p>On 24 May 2019 NZBA <a href="#">submitted</a> on Treasury's consultation document, with a focus on ensuring that 'overseas person' is defined in a way that does not capture banks providing financing.</p>	<p>In November 2019 the Associate Minister of Finance, Hon David Parker, <a href="#">announced</a> the Government's decision to introduce two new powers to ensure New Zealand's national interest can be protected: a national interest test and a power to call in transactions involving strategically important assets.</p> <p>A Bill implementing the changes will be introduced in early 2020.</p>
Online gambling in New Zealand	Low	DIA	In August 2016 DIA released a <a href="#">discussion document</a> seeking feedback on how online gambling is affecting the lives of New Zealanders and proposing a number of tools to restrict access to online gambling.	In September 2019 NZBA hosted a workshop with DIA and <a href="#">submitted</a> on the discussion document.
Review of s 36 of the Commerce Act	Low	MBIE	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: <a href="#">Review of Section 36 of the Commerce Act and other matters</a> .	In March 2019 NZBA <a href="#">submitted</a> on MBIE's discussion paper.

Project	Priority	Lead agency	Comment	Next Steps
			That discussion paper follows MBIE's <a href="#">targeted review</a> and cross-submission consultation on the same issue in November 2015 and July 2016, respectively.	
Financial Market Infrastructures Bill	Low	RBNZ	<p>RBNZ consulted in 2013 on its statutory oversight powers for payments and settlement systems which it considered were insufficient and need to be strengthened.</p> <p>In 2015 RBNZ began consultation on proposals to modify the statutory framework for the oversight of Financial Market Infrastructures.</p> <p>In September 2019 NZBA <a href="#">submitted</a> on an exposure draft of the <a href="#">Financial Market Infrastructures Bill</a>.</p>	<p>In December 2019 the <a href="#">Financial Market Infrastructures Bill</a> was introduced into Parliament.</p> <p>The Bill is expected to have its first reading in early 2020 and will then be referred to Select Committee.</p>