



Department for
International Trade

Public consultation on trade negotiations with New Zealand

Summary of responses

18 July 2019

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Foreword from the Secretary of State for International Trade and President of the Board of Trade



The United Kingdom is on the cusp of a new era in our great trading history. For the first time in nearly 50 years, we will have the freedom to pursue an independent trade policy to build a stronger, fairer and more prosperous country, more open and outward-looking than ever before.

The Government, led by my Department for International Trade, has been preparing for the United Kingdom to have an independent trade policy after we exit the European Union. We have made great strides forward. We have opened 14 informal trade dialogues with 21 countries from the United States to Australia to the United Arab Emirates. We have also been working closely with our existing trading partners to ensure the continuity of European Union trade deals. The United Kingdom's trade with countries with which we are seeking continuity¹ accounted for £139 billion or 11 per cent of the United Kingdom's trade in 2018.²

We have already signed a number of these continuity agreements which replicate the effects of the existing agreements, as far as possible. This includes Switzerland, which is one of our key trading partners and worth 2.3 per cent³ of the United Kingdom's total trade. Other agreements have been signed with Israel, the Palestine Authority, Chile, the Faroe Islands, Eastern and Southern Africa, Caribbean countries, Iceland and Norway, Fiji, Papua New Guinea, Colombia, Peru and Ecuador.⁴ We have also agreed in principle an agreement with Korea which will be signed shortly. In addition to this, we have also signed Mutual Recognition Agreements with Australia, New Zealand and the United States. We will continue to work tirelessly to deliver the maximum possible continuity and certainty for when we leave the European Union.

In addition, we have made significant headway on the United Kingdom's future independent membership of the World Trade Organization: we have submitted our proposed commitments on goods and services; established our own independent trade remedies system (the Trade Remedies Authority); and published the Export Strategy and launched 14 working groups and a number of trade reviews with key partners.

The Government is determined to build a new economic relationship with the European Union. One which sees the United Kingdom leave the Single Market and the Customs Union to seize new trading opportunities around the world, while protecting jobs, supporting growth and maintaining security co-operation. We recognise that our Future Economic Partnership with the European Union will have considerable and immediate implications for the way the United Kingdom can develop its future trade policy, in terms of its trading agreements with the rest of the world. We will continue to listen and respond to our stakeholders' views on this as we develop our own independent trade policy in parallel with the direction of the future relationship negotiations with the European Union.

¹ This excludes Turkey (plus San Marino and Andorra) which is part of a customs union with the European Union, and excludes Japan, as the Economic Partnership Agreement only came into force on 1 February 2019.

² UK total trade: all countries, non-seasonally adjusted, October to December 2018.

³ UK total trade: all countries, non-seasonally adjusted, October to December 2018.

⁴ The trade continuity agreement with Iceland and Norway would only apply in a No Deal scenario. All others would apply after the proposed Implementation period as well.

An independent trade policy means we can negotiate trade agreements specifically tailored to the United Kingdom, building links with old friends and new allies, enabling the United Kingdom to take advantage of emerging sources of growth and to deepen ties with our established partners to create shared and sustainable growth.

In July last year, we launched consultations on new free trade agreements. The consultations demonstrated the United Kingdom's intention to seek free trade agreements with the United States, Australia and New Zealand, as well as the United Kingdom potentially seeking accession to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP, a plurilateral agreement with 11 existing members).

We have engaged fully with the devolved administrations, and consulted extensively with stakeholders across the business community, civil society, academia and the general public on priorities for trade negotiations to ensure we represent the interests of the whole of the United Kingdom in any future negotiation.

We have received 601,121 responses to the four consultations on future trade agreements. I would like to thank all those who took the time to contribute to this consultation. The Government is committed to an inclusive and transparent trade policy, so today, I am publishing a summary of the consultation responses we received across the four consultations.

A handwritten signature in blue ink, appearing to read 'Liam Fox', with a stylized flourish at the end.

The Rt Hon Dr Liam Fox
Secretary of State for International Trade and President of the Board of Trade

Introduction

Background

1. As the United Kingdom (UK) leaves the European Union (EU), we will have an independent trade policy for the first time in nearly 50 years. This will give us the opportunity to forge new and ambitious trade relationships around the world, and to enter into new Free Trade Agreements (FTAs) with other countries or groups of countries.
2. The Government remains committed to building a deep and special trading partnership with the EU, but through our new independent trade policy, we can also take advantage of shifts in the global economy: According to the IMF, 90 per cent of the world economic growth over the next five years is forecast to come from outside the EU⁵; and 54 per cent of the UK's exports of goods and services are now traded outside the EU⁶, compared with only 46 per cent in 2006.
3. Through negotiating FTAs, we can work with our trading partners around the world to break down barriers to trade in goods and services, ensure that UK businesses are treated fairly, and protect our right to regulate and maintain high standards, creating the conditions for individuals and businesses to prosper. Our ambition is to:
 - Increase economic growth and productivity, through increased trade and investment, promoting greater competition and innovation.
 - Provide new employment opportunities, including higher-skilled jobs, from greater specialisation, increasing wages and opportunity across the UK.
 - Deliver a greater variety of products for consumers at a lower cost while maintaining quality.

Why this Free Trade Agreement?

4. An early priority for the UK's independent trade policy will be to negotiate a comprehensive FTA with New Zealand. New Zealand is one of our closest allies, sharing the same head of state, HM the Queen, and a country the UK already cooperates extensively with in a wide range of multilateral forums including the United Nations (UN), the World Trade Organization (WTO) and the Commonwealth. New Zealand has a reputation for negotiating high-quality FTAs. An FTA with New Zealand would be an opportunity to set an ambitious precedent for future agreements and to identify where we can collaborate to promote open markets around the world. It would also build on our strong trade relationship with current UK-New Zealand trade worth £2.8 billion in 2018.⁷ The UK exported £1.4 billion worth of goods and services to New Zealand in 2018.⁸

⁵ DIT calculations based on the IMF World Economic Outlook database, updated April 2019.

⁶ Source: ONS Balance of Payments 2019Q1.

<https://www.ons.gov.uk/economy/nationalaccounts/balanceofpayments/datasets/balanceofpayments>

⁷ UK total trade: all countries, non-seasonally adjusted, October to December 2018.

⁸ UK total trade: all countries, non-seasonally adjusted, October to December 2018.

A transparent and inclusive trade policy

5. As set out in the Trade White Paper *Preparing for our future UK trade policy* published in October 2017, the Government is committed to pursuing a trade policy which is inclusive and transparent. To ensure that any future FTA works for the whole of the UK, the Government is therefore committed to seeking views from a broad range of stakeholders from all parts of the UK. In July 2018, the Government published DIT's *approach to engagement for the pre-negotiation phase of trade negotiations* setting out its plan for pursuing new trade negotiations collaboratively by engaging with the widest range of stakeholder groups, as it takes forward its free trade agenda. For new FTAs, we have run broad open consultations. We will continue to engage as widely as possible as we look ahead to negotiations potentially starting soon.
6. On 20 July 2018, the Department for International Trade (DIT) launched four 14-week public consultations seeking views on potential FTAs with the United States (the US), Australia and New Zealand, and potential accession to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP). To support this, the Government ran a series of events around the UK to promote the consultations. All four consultations closed on 26 October 2018. This document sets out the findings from the responses received.
7. DIT welcomed feedback and comments from all interested parties to the consultations. Across the four consultations, the Government received over 600,000 responses including those submitted by campaigns. They have been analysed and are informing the Government's overall approach to the four potential future trade deals. The consultation feedback will also support the Government in meeting its commitment to delivering a UK trade policy which will benefit the UK economy, and businesses, workers, producers and consumers.
8. While many respondents welcomed the opportunities that an independent trade policy will bring as we leave EU, many respondents also mentioned the importance of the UK's future economic relationship with the EU. We recognise that the UK's future trade policy, including our ability to negotiate FTAs, will depend on the scope and substance of our future economic relationship with the EU. While comments on the UK Government's vision for the Future Economic Partnership (FEP) with the EU were outside the scope of the questions asked in this FTA consultation, they have, however, been included in our analysis.

What we asked

9. Each consultation was based on a series of questions concerning the respondent's priorities and concerns regarding the relevant agreement. The questions were broad to ensure the consultation exercise was inclusive and would encourage participation from a wide range of stakeholders. We received responses from individuals, businesses, business associations, public sector bodies, trade unions and other non-governmental organisations (NGOs). The online survey covered a range of policy areas which are typically included in any comprehensive FTA.

These were:

Tariffs	Rules of Origin (RoO)	Customs Procedures	Services	Digital
Product Standards, Regulation and Certification	Sanitary and Phytosanitary (SPS) Measures	Competition	Government (Public) Procurement	Intellectual Property (IP)
Investment	Labour & Environment	Trade Remedies and Dispute Settlement	Small- and Medium-sized Enterprise (SMEs) Policy	Other

Respondents were also able to submit additional comments not related to the areas listed above. A full list of all the questions asked during this consultation is available in Annex A.

This report

10. This document is a summary of what respondents said in the *consultation on trade negotiations with New Zealand* (the consultation). The evidence provided from the responses to this consultation (as summarised in this document), will inform the Government's overall approach to our future trading relationship with New Zealand, including our approach to negotiating any trade agreement. As we look ahead to finalising our negotiating objectives, we will continue to actively consider the consultation feedback to inform this work. Decisions made as a result of this consultation will therefore be published alongside our negotiating objectives before potential negotiations start. This report, therefore, does not set out Government policy with respect to future trade policy, but simply provides a summary of what consultation respondents have told us. The Government will take all responses to this consultation into account. A number of respondents raised points which fell outside the scope of this consultation. However, they have still been included in the statistical analysis.
11. We also received a large number of responses from outside the UK. The views provided in these responses will be analysed carefully and considered.
12. This document does not contain a list of the respondents or contain any personal or organisational details of the respondents. Their views are summarised in the following sections of this report but are not attributed to any individual respondent or business. The figures in this document refer to those who responded to the consultation, so should not be treated as statistically representative of the public at large.

13. The Government does not intend to publish any individual consultation responses it received. Many organisations have published their own responses independently.
14. DIT commissioned the research agency Ipsos MORI to analyse responses for all four consultations and produce statistical analysis with a summary of the overall findings. This analysis supplements the review of consultation feedback undertaken by the Government. Ipsos MORI developed a code frame to allow for systematic statistical analysis of the responses. The codes within the code frame represent a ‘theme’ based on an amalgamation of responses submitted and are intended to comprehensively represent all responses. The code frame and methodology, produced by Ipsos MORI, have been published alongside this report.

Overview of the responses

15. On the closure of the consultation on a potential UK-New Zealand trade deal, the Government had received 146,245 responses, submitted via the online survey and by email or post.

Table 1: A breakdown of the overall response numbers

Total number of emails, letters and online survey responses received	146,245
Online survey responses	271⁹
Post	1
Emails [non-campaign]	68
Emails [campaign]	145,905

16. Respondents were categorised into one of the following five groups:
- **An individual** – Responding with personal views, rather than as an official representative of a business, business association or another organisation.
 - **Business** – Responding in an official capacity representing the views of an individual business.
 - **Business association** – Responding in an official capacity representing the views of a business representative organisation or trade association.
 - **Non-governmental organisation (NGO)** – Responding in an official capacity as the representative of a non-governmental organisation, trade union, academic institution or another organisation.

⁹ The total number of consultees who completed an online response was 273, but 271 were deemed as valid responses.

- **Public sector body** – Responding in an official capacity as a representative of a local government organisation, public service provider, or another public sector body in the UK or elsewhere.

Online consultation portal

17. The Consultation Portal was hosted by Citizen Space (an online software tool) and contained an online survey with a total of 67 questions. This was tailored to each of the five respondent groups with additional questions for certain groups. The survey for each group asked what areas of an FTA respondents viewed as being priorities and concerns and offered respondents the opportunity to select from across 14 trade policy areas relevant to an FTA. Respondents were also given the opportunity to submit supplementary comments and to raise any other issues. In addition, business respondents and business organisations were asked to select their top priority area and top concern. Respondents could simply answer the online survey questions selecting from the 15 options for priorities and concerns with textboxes available for additional comments. While many respondents chose not to submit additional comments after filling in the questionnaire, these responses are still subject to the same analysis and will be taken into account in developing our policy.
18. Of the 67 questions, there were five general questions for all respondents to answer, 11 specific questions for individuals, ten specific questions for NGOs, 17 questions for businesses, 15 specific questions for business associations and nine specific questions for public sector bodies. See Annex A for the full list of questions asked.
19. Table 2 shows a breakdown of the number of Consultation Portal responses per respondent group.

Table 2: Total Consultation Portal responses broken down by respondent group

Respondent group	Number of responses
Individual	172
Non-governmental organisation (NGO)	27
Business	36
Business association	29
Public sector body	7
TOTAL	271

Respondents' demographic profile

20. The online survey gave respondents the option to provide additional data about themselves or their organisation. This included questions such as their geographical location, age, gender, size of business and the number of businesses the business associations represent. Using this data, we have provided a detailed breakdown of respondents' profiles in Annex B.

Responses via email and post

21. Some respondents opted to submit their responses to the consultation via email. On request, questions from the Consultation Portal survey were made available to respondents. In this case, the majority of respondents submitted a letter with specific comments tailored to the needs and circumstances of their organisation. The table below (see table 3) shows a breakdown of the number of responses by respondent group. Over two thirds of the responses sent via email were from business and industry.

Table 3: Total number of email responses broken down by respondent group

Respondent group	Number of responses
Individual	4
Non-governmental organisation (NGO)	10
Business	5
Business association	43
Public sector body	6
TOTAL	69

22. One response was submitted by post from an NGO.

Campaign responses

23. A campaigning group (38 Degrees) organised and actively encouraged responses from its members to the consultation. Nearly 150,000 responses were submitted.

Table 4: Breakdown of the number of campaign responses

Campaigning Organisation	Number of Responses	Title of Campaign
38 Degrees	145,905	<i>Submission to DIT's consultation on future trade deals</i>

24. We have not categorised responses in any way other than how they were received. In the summary of responses section of this document, which summarises the detailed comments

received by respondents, responses have been considered in the relevant policy area where they would be in a typical FTA.

Consultation feedback

Consultation events

25. As part of DIT's work to promote all four consultations, we held 12 'Town Hall' and roundtable events across the UK, seeking views from a broad range of stakeholders. Additionally, the Minister of State for Trade Policy, George Hollingbery MP, chaired a webinar (openly advertised on Twitter) with over 100 people registering. The webinar was specifically designed to discuss FTAs with specific relevance to how Small- and Medium-sized enterprises (SMEs) operate.

Table 5: Location, date and partner organisation of each event

Location	Date	Partner Organisation
Edinburgh	5 September 2018	The Scottish Council for Development and Industry
Manchester	21 September 2018	British American Business
Exeter	28 September 2018	Confederation of British Industry
Birmingham	1 October 2018	British American Business
Norwich	3 October 2018	Confederation of British Industry
Belfast	4 October 2018	Invest Northern Ireland
London	5 October 2018	Confederation of British Industry
Nottingham	8 October 2018	Geldards
Durham	10 October 2018	British Chambers of Commerce
Leeds	12 October 2018	Trades Union Congress
Cardiff	15 October 2018	British Chambers of Commerce
Reading	17 October 2018	Federation of Small Businesses
Webinar	22 October 2018	Federation of Small Businesses

26. The events were intended to encourage individuals and businesses from all parts of the UK to participate in the consultations. We partnered with leading business associations and other representative organisations to host these events with each event adapting to meet the needs and interests of the registered attendees. In total, there were over 300 attendees with a broad spectrum of trade policy interests.

27. The events were chaired by either the Secretary of State, a minister or a senior official from DIT. Leading country and policy team experts from the department were also available to answer questions. These events allowed us to hear first-hand from a range of experts from across business, trade unions, NGOs, consumer groups and other civil society representatives. Events were held under the Chatham House Rule, with comments not attributed to stakeholders. This facilitated an open and honest discussion. Feedback from attendees was positive with the events being reported as informative and valuable.
28. From these events, we gathered the following feedback to all four consultations:
- Appetite for engagement was high. Stakeholders valued the opportunity for a genuine dialogue with ministers and senior officials, an opportunity to exchange views, gather information and to be involved in the policy-making process.
 - Stakeholders welcomed the Government's commitment to an inclusive and transparent trade policy and asked for this transparency to continue throughout the negotiation process. They requested more digital content on trade to be made available, and for the Department to signpost main issues to assist them accessing pertinent information.
 - Levels of general knowledge of FTAs were mixed.
 - Many businesses were engaged but were open about the fact that the FEP with the EU and EU-Exit contingency planning was their main focus. This was consistently seen as the more immediate priority for business.
29. Understanding of FTAs varied across different stakeholder groups, with there being mixed levels of awareness about the impact of trade deals and their wider benefits to the general public. DIT recognises the need to raise awareness of future FTAs and their impact at both local and national level. The insights gained from these events will inform DIT's stakeholder engagement plans for any future stakeholder consultation exercises and for any future engagement during potential trade negotiations. The Government will continue to build upon its commitment to deliver an informed, inclusive and transparent trade policy.

Engagement with Devolved Administrations, Crown Dependencies and Overseas Territories

30. As set out in the Trade White Paper *Preparing for our future UK trade policy* the Government is committed to ensuring the devolved administrations (DAs) have a meaningful role in trade policy after we leave the EU. To develop and deliver a UK trade policy that benefits businesses, workers and consumers across the whole of the UK we will take into account the individual circumstances of England, Scotland, Wales and Northern Ireland. Working closely with the devolved administrations to deliver an approach that works for the whole of the UK continues to be a priority for DIT.
31. During the consultation, we took steps to engage widely in Scotland, Wales and Northern Ireland, including holding round tables in Edinburgh, Cardiff and Belfast.

32. The Scottish and Welsh Governments have provided views on the potential UK-New Zealand FTA via written responses and during discussion with DIT ministers and officials. We welcome and thank both Governments for these views.
33. The Northern Ireland Civil Service has published technical data in relation to New Zealand and trade and discussed this data with DIT officials. We thank them for this information.
34. DIT will continue to actively engage with the devolved administrations regarding any new potential trade deal with New Zealand through a new DIT/DA Ministerial Forum and our regular Senior Officials Group and Policy Roundtables.
35. We recognise the interest in potential UK FTAs from the Crown Dependencies and Overseas Territories, including Gibraltar, and remain fully committed to engaging with them as we develop our independent trade policy for the UK. The Secretary of State for International Trade made this commitment clear in his letter to the Chief Ministers of the Crown Dependencies and Overseas Territories at the launch of the consultations in July 2018. Discussions between DIT and the Crown Dependencies continue on a range of Trade Policy topics.
36. We will continue to seek views from the Crown Dependencies and Overseas Territories, including Gibraltar, during any potential future FTA negotiations to ensure that their interests and priorities are properly taken into account.

Engagement with Parliament

37. The Government is committed to providing Parliament with the ability to inform and scrutinise new trade agreements as we progress with developing our future trade policy. The Secretary of State for International Trade, Minister of State for Trade Policy and the Government's Chief Trade Negotiation Adviser held a briefing session on the FTA consultations, open to all Members of Parliament (MPs), on 12 September 2018. Twenty-four MPs attended, and the questions were wide ranging, covering all four consultations. Comments sent to DIT by MPs on behalf of their constituents were also considered as part of our analysis of the consultation feedback. The House of Commons International Trade Committee also published a report on *UK-US Trade Relations*, to which the Government responded on 10 July 2018. We will consider the Committee's conclusions from its inquiry on *Trade and the Commonwealth: Australia and New Zealand*.
38. On 21 February 2019 there was a debate in Government time in the House of Commons on the four potential new FTAs. The purpose of this was to help the Government to understand parliamentarians' priorities for the new FTAs before formulating our negotiating objectives.
39. On 28 February 2019 we published a paper, *Processes for making a free trade agreement after the United Kingdom has left the European Union*, which sets out proposals on public transparency for future FTAs and the role of Parliament and the devolved administrations. This included confirmation that at the start of negotiations, the Government will publish its Outline Approach, which will include our negotiating objectives, and an accompanying Scoping Assessment, setting out the potential economic impacts of any agreement. The Government stands by its commitment to ensure that Parliament has a role in scrutinising these documents

so that we can widen the range of voices heard and ensure that as many views as possible are taken into account before commencing negotiations.

40. The Government plans to draw on the expertise and experience of Parliamentarians throughout negotiations, working closely with a specific parliamentary committee, or alternatively one in each House. We envisage that the committee would have access to sensitive information that is not suitable for wider publication and could receive private briefings from negotiating teams. This would ensure that the committee(s) was able to follow negotiations closely, provide views throughout the process and take a comprehensive and informed position on the final agreement.

Summary of responses

General Themes

Respondents across all stakeholder groups provided a wide range of comments on their priorities and concerns regarding a future UK-New Zealand Free Trade Agreement. More detailed analysis can be found in the 'Analysis of responses by policy area' section. The summary below sets out the key themes raised within the five policy areas which received the greatest volume of substantive comments. We also received a large volume of campaign responses, not all of which included individual comments. These are summarised in the 'Summary of campaign responses' later in this document.

The UK's existing labour standards and environmental protections should not be reduced or negatively impacted by any future FTA with New Zealand

Across all stakeholder groups, respondents called for the UK to maintain its high labour and environment standards through an FTA with New Zealand. There were concerns that increased trade between both countries would have negative environmental impacts due to increased carbon emissions and potential ramifications for conservation and biodiversity. A number of respondents requested that as part of an FTA, existing climate change objectives should be respected, and current levels of transport emissions should be maintained or lowered rather than increased. Respondents set out that workers' rights and pay should not be undermined or adversely affected through a UK-New Zealand trade deal (with particular reference to those in the sheep and lamb industry); with some requesting a level playing field in relation to labour rights and environmental standards.

There could be benefits to the UK from lowering or removing tariffs with New Zealand, but there may be some industries that would be best supported by maintaining existing tariffs.

The majority of respondents highlighted that the reduction or removal of tariffs and Tariff Rate Quotas (TRQs) between the UK and New Zealand could increase bilateral trade between both countries. Stakeholders also raised the need to balance tariff reduction or liberalisation with the potential negative consequences to the UK's industries such as those in the meat and dairy sectors. It was therefore suggested by some respondents that these and other sectors that were perceived to be sensitive should be protected by maintaining existing tariffs. Some stakeholders also highlighted concerns that removing tariffs could undermine the preferential access to the UK market that some developing countries currently benefit from.

Any UK-New Zealand FTA should ensure a level playing field for UK businesses

Respondents highlighted that an FTA could increase competitiveness for UK products in New Zealand, but that it was important it did not negatively impact UK producers and businesses by exposing them to increased competition. They also noted that it may increase consumer choice and access to New Zealand goods and services. Respondents raised concerns that there could be job losses in certain industries resulting from increased competition, or that a reduction in standards would make UK businesses more open to unfair competition and practices. In relation to lamb and sheep meat, there was a perception that an FTA could lead to a flooding of the UK market with New Zealand imports, which could have an adverse effect on UK businesses.

The UK's existing product standards should be maintained through any future UK-New Zealand FTA

Stakeholders identified the importance of ensuring the UK's high standards were not reduced or compromised through an FTA with New Zealand. Some identified the importance of ensuring that standards continue to be aligned with those applied in the EU and those of other trading partners. Protecting the UK's standards was regarded as important to ensure the quality of goods and to safeguard consumers. It was also viewed as playing a role in ensuring that the UK businesses were not undercut by products of an inferior standard.

The UK's current health, safety and food standards should be maintained and aligned with the EU's Sanitary and Phytosanitary (SPS) measures

Respondents highlighted the importance of ensuring that the UK's high level of animal welfare, food, and health and safety standards were maintained or improved upon as part of an FTA with New Zealand. Stakeholders also reflected on the value of ensuring alignment with current standards applied in the EU. Concerns were raised in relation to the lowering of standards, and the possible detrimental impact on consumer health of accepting goods that did not meet the UK's current standards. Examples of this included accepting produce treated with growth hormones and antibiotics.

Other main themes:

In addition to the above, a number of key themes were reiterated through the responses to the consultation. A significant number of stakeholders raised the importance of protecting public services, with particular reference to the National Health Service (NHS). This was mirrored in the responses received through the 38 Degrees' organised campaign. The Government has made clear that decisions about public services will continue to be made by UK Governments, including the devolved administrations and not future trade partners.

Other key messages included the potential for a UK-New Zealand trade deal to increase services trade between both countries, especially through the inclusion of provisions to support Mutual Recognition of Professional Qualifications (MRPQs) and greater movement of people. In addition, stakeholders raised the importance of protecting the UK's Intellectual Property through any future UK-New Zealand FTA and ensuring that more widely, FTA provisions helped reduce the administrative and financial burdens of trade between both countries.

Stakeholders were positive about the potential for a UK-New Zealand FTA but highlighted that it should not compromise or negatively impact on the FEP with the EU.

Overview of Priorities

Respondents who completed their consultation response via the online survey, were classified into different respondent groups (Individual, NGO, Business, Business Association and Public Sector Body) and asked a series of questions (set out in Annex A).

All respondent groups were asked what they wanted the UK Government to achieve through a UK-New Zealand trade agreement and which of the 14 policy areas provided (as set out below) best described the priorities outlined in their previous answer. Business and business association respondents were also asked what they wanted the UK Government to achieve by reference to the 14 policy areas, and were provided with a supplementary question, asking which of these policy areas is their top priority.

The table below shows the top three policy areas selected as a priority for each of the different respondent groups.

Table 6: Top priorities selected by different respondent groups

Type of respondent (Total number)	First most selected priority (Total selected by)	Second most selected priority (Total selected by)	Third most selected priority (Total selected by)
Individuals (167)	Tariffs 105	Product Standards, Regulation and Certification 96	Customs Procedures 82
Businesses (32)	Tariffs 8	Services/Customs Procedures 4	SMEs/Other comments 4
Business Associations (26)	Tariffs 8	Product Standards, Regulation and Certification 4	Intellectual Property 4
NGOs (26)	Product Standards, Regulation and Certification 16	Tariffs 15	Labour and Environment 13
Public Sector Bodies (7)	Tariffs 5	Competition 5	Investment/Sanitary and Phytosanitary Measures 3

Overview of Concerns

All respondent groups were asked what concerns they had about a UK-New Zealand trade agreement and which of the 14 policy areas provided (as set out below) best described the concerns outlined in their previous answer.

Business and business association respondents were also asked about their concerns by reference to the 14 policy areas, and were provided with a supplementary question, asking which of these policy areas was their top concern.

The table below shows the top three policy areas selected as a concern for each of the different respondent groups.

Table 7: Top concerns selected by different respondent groups

Type of respondent (Total number)	First most selected concern (Total selected by)	Second most selected concern (Total selected by)	Third most selected concern (Total selected by)
Individuals (140)	Labour and Environment 54	Product Standards, Regulation and Certification 53	Tariffs 50
Businesses (25)	Tariffs 6	Services 4	Custom Procedures 4
Business Associations (25)	Tariffs 7	Product Standards, Regulation and Certification 4	Intellectual Property 4
NGOs (22)	Product Standards, Regulation and Certification 10	Tariffs/Labour and Environment/Trade Remedies and Dispute Settlement 9	Sanitary and Phytosanitary Measures/Intellectual Property 9
Public Sector Bodies (5)	Tariffs 3	Competition 3	Rules of Origin/Sanitary and Phytosanitary Measures/Product Standards, Regulation and Certification 2

Analysis of responses by policy area

This section contains a detailed analysis of the free text comments submitted. The feedback has been summarised with reference to the 14 policy areas and other comments provided and grouped by respondent type: (1) Individuals (2) Businesses (3) Business Associations (4) NGOs (5) Public Sector Bodies. Please note that where respondent feedback from across these different groups reflected similar views, comments or issues highlighted might overlap. Technical terms can be found in the glossary located in Annex C.

Tariffs

Overall, respondents were positive about the potential opportunities an FTA with New Zealand could bring, with many stating they would like to see a reduction or removal of tariffs. Several respondents suggested that protecting the UK market should be a priority with no reduction of tariffs on food and agricultural products imported from New Zealand.

Individuals

Fifty-five individual respondents viewed tariffs as a priority in their comments, with most of these respondents calling for a reduction or removal of tariffs. Thirty-seven individuals called for zero tariffs on goods and services. The need to balance tariff reduction, in order to promote an FTA with New Zealand, with the potential negative impacts on the UK's meat and dairy sectors was a point repeatedly made. One respondent noted that low tariff barriers might enhance ties with New Zealand. The ability of New Zealand to impose tariffs to protect its domestic industry if needed, was also raised as a concern by respondents. Respondents also expressed concerns over third countries being able to export their products to the UK via New Zealand in order to benefit from tariff reductions. Other concerns flagged pointed to the potential negative impacts to the UK farming industry from tariff reductions for agricultural products imported from New Zealand. Thirteen individuals raised concerns on tariffs, including protectionism and increased administrative burdens.

Businesses

Twenty-five businesses made comments in relation to prioritising tariffs in an FTA, with 14 respondents stating that they would like to see the removal or reduction in tariffs, highlighting the opportunity this would bring for enhancing trade between both countries. One business respondent stated that they saw tariff reduction or its elimination as having the potential to promote electronic commerce (e-commerce). Two business respondents called for a reduction in tariffs on grain products, albeit without compromising UK agricultural outputs. A need to respect the WTO Pharmaceutical Tariff Elimination Agreement was also raised. One respondent asked for the import of animal skins to remain tariff free after the UK leaves the EU. Ten businesses raised concerns on tariffs, with comments focusing on the affordability of goods, and the impact of removing tariffs on the UK dairy industry.

Business Associations

Forty-two business associations submitted comments prioritising tariffs. Nine of these responses stated that they would welcome tariff-free trade, which could greatly benefit the sectors they

represent, with several respondents requesting reciprocal tariff arrangements. The request for tariff free trade was mentioned in relation to goods most commonly but there were also comments covering specific sectors: cosmetics, spirits, books or journals. Some respondents also commented on protecting the meat and salmon industry, by ensuring the protection of Geographical Indications (GIs). Twenty-five business associations raised concerns on tariffs. Feedback included comments on the potential impact of tariff reduction on UK industries. Some respondents also suggested that tariff-free trade might cause an increase in competition or undermine preferential access to the UK market for developing countries. There were several calls for continued tariffs on food or agricultural products imported from New Zealand.

NGOs

Nine NGOs responded with comments citing tariffs as a priority in a free trade agreement, with seven NGOs raising tariffs as a concern. Several respondents stated that they would like to see the elimination or reduction of tariffs and the elimination of TRQs, with one respondent against any additional TRQs over and above the current arrangements through the EU. One NGO suggested that while opportunities would flow from tariff reductions, cheap imported products may become more competitive, putting pressure on UK produce, limiting the availability of UK products for consumers. Several NGO respondents remarked that a removal of tariffs would erode the margin of preference enjoyed by some developing countries. The point was made that preferential access in the UK for products from developing countries might partly lose its value, as those products would need to compete in the UK market with similar products from New Zealand, once the latter also receive preferential treatment. Potential trade diversion arising from tariff liberalisation on wine was also raised as a concern by NGO respondents.

Public Sector Bodies

Six public sector bodies commented on tariffs as a priority. They focused more on non-tariff barriers, rather than tariffs. Four respondents raised concerns around tariffs, including the impact of removing tariff barriers on UK businesses. One respondent stated that an FTA would not significantly improve tariff conditions for exporters, but they did note that a reduction in tariffs could make seafood imports from New Zealand more accessible to UK processors and consumers, for example, ensuring that blue grenadier (a fish species) continues to enter the UK duty free.

Rules of Origin (RoO)

Overall, there were few substantive responses on RoO, with the focus, particularly for business and business associations, being on the simplification of RoO. Respondents from across the stakeholder groups referenced local content requirements (with one respondent suggesting at least 75 per cent local content to achieve UK or New Zealand origin) and the need to be aware of global supply chains. There were suggestions for harmonising RoO across all future UK FTAs and ensuring they are similar to those in the EU-Canada Comprehensive Economic and Trade Agreement (CETA) and the EU-Japan Agreement. One business association recommended CPTPP's model of self-certification as the least cumbersome for business. Comments were also raised by respondents in this section on GIs, however, in an FTA, GIs are contained within the IP chapter and therefore we have considered the relevant comments within that section.

Individuals

Three individual respondents raised RoO as a priority in their comments, while one individual expressed concerns on RoO. Individual respondents raised concerns around low quality goods finding their way into the supply chain. Many individuals referenced RoO indirectly, with respondents highlighting the role RoO will play in preventing goods from third countries being shipped to the UK via New Zealand and benefiting from preferential tariffs.

Businesses

Sixteen businesses prioritised RoO, with comments including minimising regulations and bureaucracy, cost reductions and ensuring transparency. Eight businesses raised concerns with respect to RoO. Two business respondents called for RoO to be simplified and harmonised across all future UK FTAs and similar to those in EU-Canada CETA and EU-Japan FTA with the suggestion that these rules be reviewed to keep up with innovation. One business called for clear labelling of origin and full traceability of products, although this is not an issue that is covered by RoO provisions in FTAs.

Business Associations

Thirty-one business associations prioritised RoO in their comments. Seven comments were made on customised cumulation or diagonal cumulation, which respondents suggested would enable a UK producer to import a good from New Zealand and treat it as if it was of UK origin no matter whether the product was changed in the UK. Respondents also suggested that the UK should negotiate additional cumulation options in a trade agreement. Ten business associations raised concerns and called for the RoO administrative burden to be simplified and minimised. Some respondents also had a number of specific sectoral asks. For example, the automotive industry suggested cumulation with the EU; co-operation with EU counterparts involved in negotiations with New Zealand; staging periods in application of RoO and that embedded services such as design should be countable in Regional Value Content (RVC) calculations.

NGOs

Three NGOs viewed RoO as a priority, with three raising concerns on RoO. These respondents focused on the lack of transparency and the impact of low-quality imports. One respondent suggested the RoO cumulation requirements or 'cumulative rules of origin' should be set at 25 per cent.

Public Sector Bodies

Three public sector bodies prioritised RoO in their comments. The feedback focused on the impact of low-quality imported products and the need for transparency. Two public sector bodies expressed concerns. Comments included the impact on the UK fishing industry and lack of alignment to EU regulatory standards.

Customs Procedures

Feedback from across different respondent groups focused on the importance of keeping administrative burdens at UK borders as low as possible while prioritising frictionless trade. The need to keep new administrative requirements at borders to a minimum was cited repeatedly in the

feedback as a priority for any future UK customs system, with the impact on SMEs highlighted. Respondents also asked for customs procedures to be standardised to harmonise pre-shipment notifications and reporting requirements.

Individuals

Six individual respondents referenced customs procedures as a priority in their comments, with the focus being on the need to minimise or reduce the administrative burden. Suggestions were made for the necessary controls that should be in place. Four individuals raised concerns, with comments raised around the potential for increased administrative burdens and concerns raised around potentially illegal or counterfeit goods entering the UK.

Businesses

Nineteen businesses in their comments viewed customs procedures as a priority in a trade agreement with New Zealand. A recurring theme from the feedback was the need to reduce the administrative burden. Harmonising standards with WTO or the Organisation for Economic Co-operation and Development (OECD) rules was also raised. Ten businesses raised concerns with the focus being on the increased administrative bureaucracy. The implications for businesses exporting or importing perishable commodities was highlighted. Many businesses shared their experiences around origin declarations on invoices and import permits. It was suggested that a pre-entry system should be available at customs.

Business Associations

Twenty-three business associations viewed customs procedures as a priority, with a focus on minimising bureaucratic processes and avoiding long delays through ineffective or inadequate border controls. Speed and simplicity were viewed as being essential to custom procedures. It was suggested that the minimum provisions in WTO agreements could be used as a starting point in a trade negotiation, to facilitate a smooth transit of goods. Twelve business associations raised concerns, with a focus on the supply chain consequences and higher costs. One business association requested minimising additional and duplicative administration burdens with no expectation of a reliance on an Authorised Economic Operator (AEO) certification.

NGOs

Four NGO respondents commented that customs procedures were a priority, with points made around the need for stringent customs checks for imported food products. Other respondents flagged the need to prevent illegal or counterfeit products from entering the UK, as well as fraud prevention and retaining current procedures or standards. One respondent favoured streamlined customs procedures and higher thresholds for checks. Four NGOs raised concerns in this area, with comments on trade restrictions or inadequate border controls mentioned.

Public Sector Bodies

One public sector body provided comments on priorities for customs procedures, with a comment made on agreeing systems of equivalence in standards for cross-border trade in the healthcare sector. Two public sector bodies raised concerns on customs procedures, with comments on trade restrictions and the potential for increased administrative burdens.

Services

Overall, respondents focused on the importance of professional and financial services as priority sectors. MRPQs, mobility and visas were also key considerations raised by respondents. Respondents also recognised the importance of other areas of any agreement related to services, including digital, IP, investment, environment, SME provision, and access to public procurement. More specific commitments such as visas and the environment were also mentioned by respondents as well as legal and financial services, along with MRPQs. Relevant comments on public services, including the NHS, were also raised in the consultation sections on investment and Government procurement but have been considered in this section. For financial services, respondents covered a broad range of sub-sectors which included asset management, banking, insurance, and financial technology (FinTech). Relevant comments on MRPQs, mobility and the visa system that were raised in the consultation section on labour and environment have been considered in this section.

Individuals

Fifteen individual respondents referenced services as a priority in an FTA with New Zealand and four raised concerns. A recurring theme of the feedback was the call to protect the UK public services sector. Individuals also called for a need to protect the NHS and other public services from foreign investors forcing the UK into unrestricted open competitive tendering for public services. Several respondents welcomed addressing services regulation, including increased mobility of skilled workers and students, with one respondent stating that an FTA should encourage the movement of people for business purposes. Another respondent called for the UK to focus on softening the restrictive movement requirements for key personnel linked to investment as part of an FTA with New Zealand. One respondent suggested that the UK be a part of the Trans-Tasman Travel Agreement (TTTA) to enable easier intra-corporate transfers in areas of mutual benefit to our economies. Two individuals stated that an FTA must include financial services and highlighted the opportunities that a UK-New Zealand FTA would bring to the financial services sector. However, several individuals raised concerns that an FTA focused on trade in financial services would not benefit the UK outside of London.

Businesses

Ten businesses called for services to be prioritised in any future bilateral trade agreement with New Zealand, with two raising concerns. One respondent called for the removal of visa barriers which would allow workers to temporarily move between UK and New Zealand to provide services. Ensuring that MRPQs and the harmonisation of rules and regulations were included in an agreement was also highlighted as being important.

Business also raised concerns over restrictive foreign investment screening practices. On financial services, businesses identified an interest in removing any remaining restrictions on the provision of banking services. Several businesses raised FinTech as a key interest, with respondents stating that New Zealand's smaller market is known for early adoption of technologies which offers opportunities for UK financial technology (FinTech) seeking to enter the market. Insurance was also a key interest, with respondents identifying strong trade links in the insurance and reinsurance sectors. Ensuring regulatory co-operation on financial services was also mentioned as a key priority. Two businesses raised concerns over the privatisation of public services and the postal services.

Business Associations

Twenty-four business association respondents prioritised services trade in their comments. One business association stated that trade in services particularly mattered to small exporters, as SMEs starting to export are more likely to trade in services. Some respondents stated that an FTA should also facilitate the movement of skilled workers and called for a greater recognition of professional qualifications. Respondents noted that this would enable UK businesses to gain access to the best global talent. One business association had concerns about the potential for unrestricted freedom of movement but was of the view that there was a need for a targeted approach where there is a need for specific types of labour. There was a suggestion of a professional mobility programme within the General Work Visa (Tier 2) to facilitate the compliant entry of professionals to the UK, creating a category of UK working visa for which only professional New Zealand citizens working in certain occupational categories are eligible.

Respondents also called for the Government to consider the impact of any visa processing requirements resulting from an end to the freedom of movement for European Economic Area (EEA) nationals. Several respondents emphasised that the UK's high standards in relation to services should be maintained and promoted in an FTA with New Zealand. Several respondents identified potential for exploring wider tools to achieve market access and regulatory coherence in financial services. Some business associations identified that New Zealand's asset management industry is growing rapidly, and respondents were of the view that this growth would provide important opportunities for UK firms. Two comments were made regarding the protection of consultancy services and service design. Eleven business associations raised concerns which included: privatisation of public services, litigation, barriers to services trade and the lack of recognition of standards.

NGOs

Sixteen NGO respondents prioritised services trade in their comments. The feedback was generally optimistic about the potential benefits, with several respondents requesting for MRPs between the UK and New Zealand. The engineering sector in particular recognised the value of MRPs and noted the opportunities available to deliver frictionless movement of services. The inclusion of the technology and innovation services in an FTA was also raised by one respondent as being important. Ten NGOs expressed concerns with points made around the impact that an FTA might have on local government services, legal services and financial services. NGO respondents also identified that the UK is a leader in financial services and called for the UK's high regulatory standards to be protected. One NGO stated that the UK's high educational standards must be maintained. Some NGO respondents were concerned that any trade agreement between the UK and New Zealand might pose a threat to public services, emphasising the need to include rigorous protections for public services in any future FTA. A common suggestion was that the healthcare sector should be exempt from any commitments that could lock-in competitive procurement of publicly funded healthcare services in England or impose competitive procurement in the devolved administrations. Several respondents suggested that to protect public services, including the NHS, they should be excluded from the scope of an FTA. One NGO respondent asked that FTAs with other countries do not limit the digital services already available between the UK and New Zealand.

Public Sector Bodies

Four public sector bodies prioritised services trade in their comments. Most of these respondents were keen for the UK to sign an FTA with New Zealand as they recognised potential opportunities. This included adding to the ease at which financial and related professional services are able to operate their businesses in these markets and use their expertise in New Zealand and across the region. The potential growth to UK businesses that the New Zealand market would bring was also noted.

Several public sector bodies also identified the benefits of free movement of financial services employees and welcomed strong financial services elements in any future FTA. Respondents also identified that cross-border trade in financial services supports competition across financial markets and provides a wide range of choice to customers. One respondent maintained that any new MRPQ regime would need to ensure that the relevant qualification for nursing or midwifery is equivalent to the strong standards of the UK qualification, in order to maintain patient safety. Only one public sector body raised concerns, stating they would not want concessions made in any trade agreement to impact adversely on public health, or place an additional burden on health and social care services. There was also a comment about excluding public services, including the NHS, from the scope of FTA negotiations.

Digital

Overall, respondents asked for a trade agreement with New Zealand to ensure the free flow of data in line with the EU General Data Protection Regulation (GDPR). Respondents also noted that it is important to consider an adequacy agreement with New Zealand. The importance of preventing data localisation was also a point repeatedly made. Respondents were generally against changes to current EU platform liability rules.

There was general support for global rather than national responses to the tax challenges of digitisation and for rules on digital goods not being a barrier to trade. Some respondents asked for non-discrimination clauses to be enhanced to protect 'net-neutrality', as well as guaranteeing better market competition. Many respondents were of the view that New Zealand businesses can already access the Audio Visual (AV) market.

A number of comments focused on how an FTA might adversely affect the UK's AV ecosystem, with one respondent making particular reference to the positive impact of the UK's Public Service Broadcasting (PSB) system to the success of UK businesses abroad. Maintaining 'cultural heritage' was also a consideration. Respondents from the newspaper industry called for there to be no unjustified restrictions on the cross-border publication dissemination of UK newspapers, in print and online, or news brands subscriptions and advertising services. Respondents from the gaming sector emphasised the need to maintain frictionless trade and suggested the focus should be on breaking down barriers where these existed with trading partners. Some respondents also raised the issue of safe harbours, copyright and online infringement. However, in a typical FTA, these are contained within the IP chapter and therefore we have considered these comments in that section of this document.

Individuals

Four individual respondents referenced digital as a priority in their comments. Points raised included, support for existing data privacy protection and sharing, particularly the control of the movement of data and the need for it to be maintained or strengthened. Two respondents called for the harmonisation of standards between trading partners. One comment included a request for there to be no barriers at all to digital trade. Three individual respondents raised concerns with comments focusing on data protection and privacy.

Businesses

Fifteen business respondents prioritised digital services in their comments. Three businesses called for free flow of data exchange (in line with GDPR). A further three respondents called for data protection standards to be harmonised. Two businesses asked for an open market, without barriers for digital services. One respondent requested a replacement to the UK's participation in the EU-New Zealand mutual adequacy agreement for personal data (however, there was a view that adequacy with the EU is potentially more important). Seven business respondents expressed concerns related to digital services with the main focus, raised by five respondents, being around data protection. A small number of business respondents expressed concerns on the consequences of harmonising standards and flagged misuse of data concerns. Other points made included calling for data localisation to be prevented and for cross border data flows to be enabled, subject to reasonable safeguards.

Business Associations

Seventeen business associations referenced digital services as a priority in their comments. Seven business associations called for the free flow of data to be in line with GDPR requirements. Four business associations suggested that any future agreement should benefit both trading partners equally, with three of these respondents asking for greater harmonisation of standards, including a request to retain existing European standards set by the European Telecommunications Standards Institute (ETSI). Respondents from the creative industries had specific requests. These included asking for a UK-New Zealand FTA to go further than the United States-Mexico-Canada Agreement (USMCA) and ensure Value Added Tax (VAT) is removed on digital products. They also suggested greater collaboration through FTAs on anti-trust issues, for example, monopolisation of e-book platforms. Co-operation was also seen as being important to data ethics and Artificial Intelligence (AI).

Ten business associations raised concerns around digital services. Similar to business respondents, these tended to relate to data protection and privacy (four comments). Other points made included the burden to business of adding any extra administrative requirements. A business association raised concerns that FTAs might predominantly favour large technological companies. There was also a request for the UK Government to consult at a detailed sectoral level throughout the negotiation process.

NGOs

Three NGOs referenced digital services as a priority in a UK-New Zealand FTA. Comments ranged from calls for digital trade to remain untaxed and include provisions to stop governments from imposing requirements that limit digital services, to requests to maintain current levels of data

protection. Three NGO respondents expressed concerns related to digital services. These included a lack of transparency on complex data issues in negotiations, concerns over the compatibility of an FTA's data provisions with commitments to GDPR, worries about restriction of content, with one comment raised on the influence of big tech companies and another on data protection.

Public Sector Bodies

Four public sector bodies referenced digital services as a priority in a UK-New Zealand FTA. They suggested that any FTA covers the latest cutting-edge technology, that both partners increase co-operation around digital issues and that access to international markets was key for digital services. No public sector bodies raised concerns on digital.

Product Standards, Regulation and Certification

This policy area covers technical regulations, voluntary product standards and the procedures to ensure that these are met. Standards and measures to protect humans, animals and plants as well as to regulate food, animal and plant safety are discussed under the SPS section of this report.

The terms 'standards' and 'technical regulations' are used frequently in trade agreements when addressing 'technical barriers to trade'. While the word 'standard' is used informally to mean a level of quality or attainment, in the context of trade agreements 'standards' have a formal technical meaning. 'Standards' in this sense are voluntary documents developed through consultation and consensus which describe a way of, for example, making a product, managing a process, or delivering a service. While standards are voluntary, when cited in a regulation, their use can become compulsory. Standards are not set or controlled by the Government. 'Technical regulations' are mandatory requirements set out in the legislation and they are controlled by governments and legislators (Parliament in the UK). For regulated products and services, standards can be used to support compliance.

The importance of maintaining the UK's current high standards and continuing to align these with standards used across Europe was highlighted in comments from all respondent groups. A number of sector specific international standards were outlined in responses with a request for these regulations to be maintained or improved upon. Relevant comments on standards and levels of protection that were submitted to the consultation section on labour and environment have been considered in this section.

Individuals

Twenty individuals prioritised product standards, regulation and certification in their comments. Nine individuals advocated in their response that European standards be retained or improved upon in any FTA with New Zealand. Other comments included ensuring alignment of UK product standards with both European and non-European trading partners. Fourteen individuals raised concerns about product standards, regulation and certification, with many of these comments centred around the implications of having unaligned standards.

Businesses

Twenty-one businesses prioritised product standards, regulation and certification in their comments. Most respondents focused on ensuring the alignment of standards between trading

partners and the use of international standards. Maintaining or improving existing standards between the UK and New Zealand was also emphasised as being important by business respondents, with one referring to the need to maintain current CE marking requirements. There was also a request from one respondent to include sectoral annexes in an FTA which would help promote international regulatory convergence. Six businesses raised concerns around product standards, regulation and certification, with one respondent highlighting their concern over the impact on standards relating to product labelling, for example on alcoholic beverages which could be covered in individual sector annexes of an FTA. A lack of harmonisation of standards was also highlighted as a primary concern by business respondents, as some were of the view that a lack of harmonisation might result in unnecessary costs to industries.

Business Associations

Thirty-three business associations prioritised product standards, regulation and certification in their comments. Seven of these respondents highlighted the importance of international regulatory harmonisation. The importance of maintaining the UK's current high standards and ensuring that these align with European standards was also emphasised in feedback from business associations. Continued alignment with standards and regulations applied in the EU, including future co-operation with the European Medicines Agency (EMA), was expressed as a top priority by pharmaceutical industry associations. Fourteen business associations raised concerns in relation to product standards, regulation and certification. One business association called for the UK Government to protect UK farmers from competitive pressures from importers who are potentially not subject to the same high standards. There was an expectation that UK farming might need to be protected by Government from any damage due to increased imports from New Zealand.

NGOs

Fourteen NGOs viewed product standards, regulation and certification as a priority in their comments. Eight respondents were of the view that existing standards should be maintained or improved with four respondents talking of the need to protect consumers. Two respondents called for greater harmonisation with international standards. One respondent asked for the UK's current approach to be maintained regarding the precautionary principle, with respondents highlighting New Zealand's differing approach to this. The different regulatory regime operated by New Zealand was also flagged by one NGO respondent. Another respondent also suggested that it should be a priority for the UK to implement the EU-New Zealand Mutual Recognition Agreement (MRA). Twelve NGOs raised concerns about product standards, regulation and certification, with five of these respondents concentrating on the impact that an FTA could have on standards, levels or protection and consumer rights. Other issues raised by NGOs included traceability and the quality of imported products.

Public Sector Bodies

Two public sector bodies viewed product standards, regulation and certification as a priority in their comments. One respondent requested high standards be maintained to protect consumers, as well as maintaining or improving standards related to product labelling, particularly on standards for pharmaceutical and medical products. Two public sector bodies had concerns with points made around the lack of mutual recognition of standards, lack of alignment or harmonisation of standards between trading partners, and concerns about sustainability.

Sanitary and Phytosanitary Measures (SPS)

This policy area covers standards and measures to protect humans, animals and plants as well as to regulate food, animal and plant safety. Voluntary product standards and the procedures to ensure that these are met are discussed under the product standards, regulation and certification section of this document.

A range of issues on SPS were highlighted across the different respondent groups. A key focus was animal welfare and the concerns around the potential lowering of food standards. Business respondents were generally of the view that the existing SPS agreements in place with New Zealand and the EU should be used and built upon. Maintaining regulatory alignment with the current EU standards was a recurring theme in the consultation feedback.

Individuals

Twenty-two individuals viewed SPS as a priority, with many emphasising the importance of maintaining or improving animal welfare standards. Health and safety and standards for agricultural products and food were also raised. Ten individual respondents expressed concerns with comments including the potential risk from chemicals in food and uneasiness around “hormone injected beef”, antibiotics in meat and additives or preservatives in food.

Businesses

Fifteen businesses commented on SPS as a priority with the focus being on the need to align standards between trading partners and maintaining existing EU standards. One business respondent suggested that tariffs should only be removed when SPS measures are materially equivalent. Comments were also made around the need for rules applying to grain and non-grain feed to not be more stringent than existing EU requirements. Three businesses expressed concerns about the potential impact on the UK dairy industry, as well as on UK food standards and animal welfare.

Business Associations

Twenty-three business associations viewed SPS as a priority in their comments, with respondents focused on the need to maintain high food and animal welfare standards and agricultural and farming practices. Eleven business associations raised concerns around animal welfare and the potential impact on food standards was a recurring theme of the feedback. Restrictions on poultry imports applied by New Zealand due to the impact of Infectious Bursal Disease was also raised as being a potential regulatory barrier which needed to be addressed in the negotiations. Biosecurity Risk Screening Levy and the Import Entry Transaction Fee were other barriers to trade highlighted by business association respondents.

NGOs

Fourteen NGO respondents raised SPS as a priority, with 14 raising concerns. NGO respondents were against imports of food stuffs that fell below the UK or EU standards, hormone treated beef and the use of antibiotics. Representatives of the farming sector shared evidence about the causal factors behind recent outbreaks of Mycoplasma bovis cattle disease. Respondents also called for greater harmonisation between trading partners. The importance of protecting the WTO

precautionary principle was also raised. The Cartagena Protocol on Biosafety (under which the UK and New Zealand share international obligations regarding risk assessments) was raised as being important in addition to maintaining Genetically Modified (GM) food labelling. The UN World Health Organization (WHO) Food and Agriculture Organization (FAO) One Health Antimicrobial Resistance (AMR) strategy was also flagged as being important.

Public Sector Bodies

Two public sector bodies referenced SPS as being a priority in their comments with two raising concerns about SPS. One respondent focused on the potential impact on public health. A local authority was concerned about the impact of a greater volume of imported produce from New Zealand on the farming industry in their county, at a time of transition for the sector.

Competition

Although the terms 'competition' and 'competitiveness' are sometimes used interchangeably, they have distinct technical meanings. Competition policy covers the rules and regulations concerning the way businesses operate within a market and the enforcement of such rules. Competition laws, for example, typically cover anti-competitive agreements between firms, abuse of a dominant position and merger control. Competitiveness refers to the general ability of a firm to operate in a market compared to other firms that operate in the same market, or the strength of a whole industry or economy relative to another.

Overall, most respondent groups focused on the impact of FTAs on competitiveness, not on competition policy or legal regimes. There were detailed comments regarding competition within responses across the stakeholder groups.

Individuals

Twenty-eight individual respondents referenced competition as a priority in their comments. The feedback was focused on the importance of protecting the competitiveness of UK industries. Respondents also called for the protection of current health and safety regulations to ensure that British producers and businesses can compete. Ten individual respondents stated that UK agriculture and farming should be protected, noting agriculture as being a key sector which could be impacted. Four respondents had specific concerns around the import of New Zealand meat, particularly lamb. Some respondents were concerned that liberalising markets might lead to increased international competition, resulting in job losses in certain industries. However, seven respondents were positive about the increase in choice of goods and services that would follow from markets being more opened-up. Twenty-eight individual respondents raised concerns around competition, with 13 comments made on the potential negative impact on the UK agriculture sector.

Businesses

Nineteen business responses prioritised competition in a UK-New Zealand trade agreement. Points made included the opportunity for the UK-New Zealand FTA to become a benchmark agreement in digital, services, and telecommunications sectors by ensuring market competition and greater liberalisation. Two respondents called for UK businesses to be protected from foreign competition, with references to “demolishing corporate monopolies”. Twelve businesses raised

concerns around competition, which focused on perceived unfairness. Respondents were also concerned about the potential negative effects importation of food into the UK would have on the dairy industry and local businesses.

Business Associations

Twenty-eight business associations prioritised competition in their comments. Feedback included suggestions that an FTA might lead to the removal of current import duties, making UK exports more competitive in New Zealand. Some respondents also highlighted the impact for counter-seasonal industries. Respondents recognised that the need to ensure no unfair competition for UK businesses must be appropriately balanced against allowing greater access to more competitively priced goods and services. Several business associations were of the view that allowing greater mobility of skilled workers might attract and retain the right talent to the UK which would ensure that UK businesses and industries would remain competitive. Twenty-four business associations raised concerns on competition, with many comments focusing on the competitiveness of agri-food (specifically relating to the import of lower-standard produce). There was a request for an impact assessment on the UK domestic market to be carried out. A point was made around the opportunity to create better product definitions (eg 'whisky') to ensure consumers are not deceived or misled.

NGOs

Ten NGOs prioritised competition in their comments. For some of these respondents, protection of public healthcare services and the farming industry was of paramount importance. Several respondents also called for competition to be encouraged and protected with increased consumer choice being a potential result. Eleven NGOs raised concerns on competition, with respondents highlighting the potential increased competition for developing countries. Some NGOs also flagged the efforts of UK farmers and fisheries to protect the environment and had reservations about the impact increased competition for the meat, dairy and egg industries might have on this.

Public Sector Bodies

Five public sector bodies prioritised competition in their comments. Opportunities were identified by these respondents, which included the lowering of trade restrictions on services leading to increased competition across and within financial markets, which would result in higher growth and investment. One respondent focused on the need to promote innovation. Three public sector bodies highlighted the potential benefits of competition, including a wider range of choice for consumers, with two stating that encouraging tighter pricing and offering financial incentives could encourage competition further. Six public sector bodies raised concerns about competition, mainly centred around ensuring health and social care provisions are excluded from requirements for fully open competitive tendering or onerous procurement requirements, while adhering to WTO rules on fairness and transparency. Similarly, the impact of increased competition on local markets was viewed as being important with requests for measures to be put in place to protect local businesses, industries and markets. Two respondents focused on the impact on beef and pork industries, with concerns also expressed about the impact on UK agriculture. Other concerns focused on domestic and local industries becoming exposed to unfair competition from countries that have lower standards, laws and rights.

Government (Public) Procurement

There were diverging views across the different respondent groups. While some advocated opening up central and local government procurement markets for foreign bidders, others favoured the UK authorities prioritising local suppliers. Comments relating to public services, including the NHS (which emerged as a very high priority for all respondents) have been discussed in more detail in the services section of this document. To note, the term 'public procurement' was used in the consultation, however, the term 'government procurement' is more commonly used in the international trade context and will be used henceforth.

Individuals

Six individual respondents referenced government procurement as a priority in their comments with feedback centred around protections for public services, including the NHS. Two individuals raised concerns in this area, with the impact on public services flagged. One individual suggested closer co-operation on military procurement.

Businesses

Ten businesses viewed this area as a priority in their comments. Feedback included points around the promotion of high standards in government procurement, with open, fair and transparent rules needed to support the interests of industry, commissioning public authorities and the general public. It was suggested this be combined with simplification of applications and procedures and the use of one portal for all contracts to enable all eligible companies, including SMEs, to bid and compete on a level playing field. One respondent was of the view that SMEs should be actively supported by UK authorities through preferential purchasing policies. Moreover, transparent information should be shared with the public regarding winners of public contracts. Some respondents were of the view that a UK FTA with New Zealand could potentially open-up additional opportunities for UK companies in areas such as in the life sciences and pharmaceuticals sector. They asked for the UK Government to help them navigate through New Zealand's public policy and regulatory frameworks on government procurement. Six businesses raised concerns on government procurement. Comments included national interest considerations restricting access to procurement opportunities, particularly in the defence sector. There were also concerns around limited access to information which might put UK companies (as foreign bidders) in a disadvantaged position.

Business Associations

Eleven business associations viewed government procurement as a priority in their comments, with one raising concerns. There were requests for broad market access coverage of both goods and services in government procurement and a desire for access to central, regional and local government contracts. It was suggested that New Zealand's offer might go beyond the country's commitments under the WTO Government Procurement Agreement (GPA). One respondent thought an FTA could open-up access to New Zealand's procurement market for UK companies, opportunities which are already enjoyed by companies from countries which have an FTA with New Zealand. Some respondents suggested that removing barriers to government procurement could create new business and employment opportunities and facilitate access to medicines for patients worldwide. They also requested a level playing field domestically, given that UK

companies face competition from foreign bidders in our relatively open domestic market but do not have a comparable access to third countries' procurement opportunities.

Feedback was received from specific sectors, eg railways, construction and financial services, where UK companies have interests in New Zealand government procurement opportunities. Many respondents also highlighted a request for transparency and greater access to information about procurement opportunities. One respondent raised a concern about an increase in protectionist policies that sought to reserve local procurement for local companies and/or any derogation from national treatment. Some respondents raised general concerns about protectionism and a lack of public procurement frameworks. A further suggestion advised the UK Government to make more use of Article 58 of the EU Utilities Directive and restrict market access for bids with more than 50 per cent of content originating in a third country, where the UK has no FTA.

NGOs

Nine NGO respondents prioritised government procurement in their comments. Many respondents considered it important to have clauses in the agreement enabling the UK Government and other public authorities to prioritise purchases from local suppliers (eg food industry) to support local economic development, pursue social and environmental objectives, and support ethical procurement. In this context, six NGO respondents expressed concerns about government procurement issues. One respondent was of the view that the UK should be advocating opening up of government procurement contracts between the UK and New Zealand, on a non-discriminatory basis and equal (national) treatment of financial services, legal and consultancy companies.

Public Sector Bodies

Two public sector body respondents prioritised government procurement in their comments, with two raising concerns. Echoing feedback from other respondent groups, they suggested excluding public services as far as possible from requirements for competitive tendering or onerous procurement requirements, while adhering to WTO rules on fairness and transparency. This concern was also raised by other respondent groups.

Intellectual Property (IP)

Overall, most respondents highlighted the need to protect UK standards on IP protection. Other common issues raised included mutual recognition of IP rights, copyright protection and access to medicine. Relevant comments on GIs, copyright, safe harbours and algorithms were also raised in the consultation section on RoO and digital respectively but have been considered in this section.

Individuals

Four individual respondents prioritised IP, with comments focused on the need to protect and maintain GIs. Respondents also called for the protection of copyright, trade marks and patents. One respondent stated that illegal and counterfeit goods should be properly dealt with, in any potential trade deal with New Zealand. No individuals raised any specific concerns in their comments relating to IP.

Businesses

Twenty-one businesses prioritised IP protection in their comments and six businesses raised concerns. Feedback focused on protecting copyright, patents and trade marks. One respondent commented on the opportunity for the UK to negotiate IP provisions in FTAs beyond the minimum levels of IP protection found in the WTO's Trade-Related Aspects of Intellectual Property (TRIPS) agreement. Businesses also highlighted the importance of effective dispute and enforcement mechanisms against IP infringement. Rules on patent term extension was another issue raised by some businesses. Business respondents also commented on the need to protect UK GIs and local brands.

Business Associations

Thirty-seven business associations prioritised IP, with most focusing on the need to maintain the UK's IP regime and calling for the promotion of high IP standards. Other issues raised on IP included: protecting GIs, exploring how SMEs can access support from IP offices, the transparency of IP registration processes and for increasing the length of copyright protection after a creator's death to 70 years. Seventeen business associations raised concerns about IP, with respondents concerned about enforcing against counterfeit goods and pirated content entering the UK market. Several associations also warned against implementing limitations to liability for online platforms that host IP infringing content. Businesses also had concerns relating to the consequence of safe harbours.

NGOs

Ten NGO respondents referred to IP in their response as a priority, with seven raising concerns. Six NGOs advocated that copyright, patents and trade marks should be protected in a trade agreement with New Zealand. Two further comments stated that copyright terms of 70-years after the death of an author or creator should be maintained or extended. Several NGOs also highlighted the importance of Artists' Resale Rights.

Public Sector Bodies

Four public sector bodies referenced IP as a priority in their comments while two raised concerns. Comments included: safeguarding and promoting patient access to medicines, protection from unfair competition in relation to low IP rights, and for mutual respect to IP ownership. One respondent commented on the need to protect GIs in any trade agreement with New Zealand.

Investment

Overall, many respondents saw an opportunity in the future trade agreement to boost investment and indicated specific sectors where this could be beneficial for the UK. However, it was important for many respondents across all groups of respondents to protect public services, including the NHS. However, in a typical FTA, public services are contained within the services chapter and therefore we have considered relevant comments in the services section of this document. Some respondents expressed support for investment protection provisions and including ISDS, as they were of the view that it could provide reassurance for investors, as well as facilitate investment. Many other respondents had reservations about the inclusion of an ISDS mechanism in a future FTA. These respondents were concerned that an ISDS mechanism could restrict the

Government's right to regulate in the public interest, discriminate domestic investors compared to foreign ones, and impose high costs of proceedings. Relevant comments on ISDS that were raised in the consultation section on trade remedies and dispute settlement have been considered in this section.

Individuals

Six individual respondents prioritised investment in their comments, and one raised concerns. Three respondents were of the view that an FTA with New Zealand could encourage investment, eg in financial services. Respondents expressed concerns around the ISDS mechanism, as they were of the view that it may restrict the right of Government to regulate in public interest and, if ISDS is included, it should guarantee transparency of proceedings and public security. There were also views that an investment chapter should guarantee a balance in the protection of interests of all parties.

Businesses

Eleven business respondents prioritised investment in their comments. Six businesses raised investment as a concern, with comments including the impact of foreign investment and potential unfairness surrounding access to investment information for UK businesses. Respondents were of the view that an FTA with strong investment provisions could facilitate investment, particularly in manufacturing. Respondents asked for investment rules to be transparent, stable and predictable to ensure fair treatment of investors. Some business respondents were supportive of investment protection provisions being included in a future FTA, as they were of the view that they could play a role in facilitating future investment. Other respondents expected the remaining barriers to investment, such as requirements related to local content, to be removed and equal (national) treatment of investors ensured. Some respondents called on the Government to provide information and advice to UK companies (eg about the partner countries' economic and regulatory environment, including taxation) to facilitate their investment decisions. In their view, lack of or restricted access to important information may lead to mistaken investment decisions or increase investment-related risk. One respondent flagged that ISDS mechanisms are costly and inaccessible for small businesses. However, larger businesses tended to be in support of including ISDS.

Business Associations

Thirteen business associations prioritised investment in their comments. Eleven business associations raised concerns on investment, with three comments focusing on the impacts of foreign investment. Points made included requests for transparent and stable investment rules, fair treatment of investors and removal of the remaining barriers to investment. It was also suggested that investors should be allowed to transfer their investment-related capital between the UK and New Zealand. Several respondents recognised the opportunity in an FTA to boost investment, for example, in construction and publishing. Other respondents warned that opening the UK market for investment should not be at the expense of domestic business and income. There was generally a positive response to the inclusion of a dispute settlement mechanism from business associations, with one respondent noting that investor protection and access to formal ISDS mechanisms is important. They, and other respondents were of the view that the Government should focus on resolving disputes quickly and fairly, while ensuring that it does not restrict the Government's right

to regulate in public interest. Some respondents were concerned that ISDS mechanisms are costly and inaccessible for small businesses.

NGOs

Eight NGO respondents commented on investment as a priority in their comments and six as a concern. Many respondents referred to a need to preserve the right of the Government to regulate in the public interest (eg regarding working conditions, environmental and food standards, public health and healthcare services) and expressed a concern that ISDS could undermine it. In their view, ISDS should be excluded from an FTA. Several respondents were of the view ISDS might also introduce discrimination of domestic investors as compared to foreign ones and would not increase investment flows. In addition, some respondents thought that its inclusion results in high arbitration costs for the Government to cover, irrespective of the ruling. Respondents viewed UK and New Zealand investors as having access to fair and impartial domestic legal systems to protect their rights, emphasising that there should be no so-called 'kangaroo courts'. It was also perceived by some respondents that New Zealand is critical of ISDS mechanisms. In this context, respondents suggested alternative methods of dispute settlement or protecting investor's rights, for example, mediation, insurance against potential political risks, state-to-state dispute settlement or WTO mechanisms. Some respondents stressed investment policy should be consistent with the country's commitments on business and human rights and an investment chapter should follow the latest international practice, for example, provisions on responsible business conduct and its inclusion into an FTA should be preceded by a broad public debate. Some respondents stated that an FTA may encourage investment, for example, in research and development (R&D).

Public Sector Bodies

Four public sector body respondents referenced investment as being a priority in their comments. Comments included Foreign Direct Investment (FDI) playing a role in creating new jobs and the need to encourage the sharing of technology and innovation between companies. It was also suggested that anti-competitive behaviours should be identified and addressed. Two public sector body respondents raised investment as a concern, with comments on not including ISDS provisions into an FTA between two developed countries with robust legal systems, as investors may turn to national tribunals if they consider their rights have been violated, and ISDS could undermine the Government's ability to regulate in the public interest. Respondents noted that if investment protection is included in an FTA, the system should be transparent and balance interest of investors and public.

Labour and Environment

Overall, respondents from all respondent groups called for the Government to maintain the UK's high labour and environmental standards. Many respondents identified the opportunity of increasing the movement of workers between New Zealand and the UK but emphasised that labour laws need to be protected. Particular concerns were raised on the environment and climate change, where many respondents were concerned that increased trade with New Zealand could lead to increased emissions. Many comments were also raised by respondents in this section on MRPQs, mobility and the visa system. However, in an FTA these are contained within the services chapter so relevant comments have been raised there. Respondents also raised comments on human rights, public health, quality of life and impact assessments in this section. As these are

social aspects of an FTA, relevant comments have been raised in the other issues section of this document. In this section, respondents also commented on standards beyond labour and the environment. These comments have been addressed in the standards section of this document.

Individuals

Sixty-two individual respondents prioritised labour and environment in their comments with the majority of responses focusing on labour issues. Two respondents asked for labour rights to be improved as a result of a trade agreement with New Zealand. Two respondents were concerned that pay and wages might be impacted. Thirty-nine individuals raised concerns on labour and the environment. Fifteen respondents commented on the geographical distance between New Zealand and the UK, with increased trade potentially resulting in increased carbon emissions. Thirteen respondents asked for current environmental standards to be maintained or improved, including specific calls for climate change objectives to be respected and for transportation emissions to be maintained or lowered.

Businesses

Sixteen businesses prioritised labour and environment in their comments, with five raising concerns. One business respondent stated that a future FTA with New Zealand should include a social and environmental chapter (or a sustainable development chapter) with an effective enforcement mechanism and provisions committing the trading parties to uphold high levels of consumer, labour, environment and animal protection. Six comments by business respondents called for the maintenance of environmental standards, with three respondents noting their concerns over the impact a trade agreement could have on the environment. One respondent recognised that an FTA with New Zealand might bring about opportunities to contribute to the UN's Sustainable Development Goals.

Business Associations

Twenty-nine business associations viewed labour and environmental issues as a priority, with the need to maintain current standards a recurring theme across the feedback. Some business associations from the agriculture sector were positive about the opportunities to co-operate with counterparts from New Zealand in addressing global issues. Fourteen business associations raised concerns around labour and the environment. In particular, several respondents raised environmental concerns on the potential impact on conservation and biodiversity. Concerns around workers' rights and barriers to free movement for workers were also raised as being important. Respondents asked for a robust 'level playing field' inclusive of labour rights and environmental standards within a trade agreement.

NGOs

Twenty-three NGO respondents prioritised labour and environmental aspects of a trade agreement with NZ in their comments. Seven NGO respondents focused on the need for environmental standards to be maintained or improved. Seventeen NGO respondents commented on labour aspects with the need to protect labour rights a point repeatedly made. It was suggested the Government engage with trade unions and employers on this. The potential impacts for the lamb and sheep farming industry were singled out in the comments. Fourteen NGO respondents viewed labour and environmental issues as being a concern with the focus on environmental issues

including climate change, global warming and sustainability. One NGO also recommended for environmental provisions to be enforceable through adequate procedures including through citizen and civil society mechanisms.

Public Sector Bodies

Five public sector bodies viewed labour and environmental aspects of a UK and New Zealand trade agreement as a priority. Feedback was consistent with comments from NGOs. Four public sector bodies raised concerns on labour and the environment, which included concerns around emissions potentially increasing and the negative environmental impacts from this. Several respondents asked for assurances that any future trade agreement would not undermine their key industries by exposing UK producers to unfair competition from producers in countries that have lower food quality standards and regulations, labour laws and environmental standards. One respondent was concerned about a trade agreement having a negative impact on worker pay and conditions due to competitive pressures.

Trade Remedies and Dispute Settlement

Overall, respondents commented on state-to-state dispute settlement mechanisms and on including trade remedies in any UK-New Zealand FTA. Comments were also raised by respondents in this section on ISDS mechanisms. However, in an FTA, ISDS is contained within the Investment chapter and therefore we have considered these comments in that section of this chapter. During the consultation, trade remedies and dispute settlement were considered within the same section, however these are different policy areas contained within different chapters of an FTA. Given we have received distinct comments relating to these issues the analysis has been split according to the issues below.

Seven individuals noted trade remedies and dispute settlement as a priority, and two individuals raised concerns in these areas. Sixteen businesses raised trade remedies and dispute settlement as a priority in an FTA with New Zealand and six businesses raised these areas as a concern. There were 19 business associations which raised comments on trade remedies and dispute settlement as a priority, while ten business associations raised concerns in these areas. Eleven NGOs raised comments on trade remedies and dispute settlement as a priority while ten NGOs indicated they had concerns in these areas. One public sector body raised comments on trade remedies and dispute settlement as a priority, while one public sector body raised these areas as a concern.

The numbers above reflect those who have highlighted trade remedies and dispute settlement as a priority or concern. The detailed analysis below focuses on the specific comments received relating to either trade remedies or dispute settlement.

Trade Remedies

Individuals

On trade remedies, individuals voiced support for trade liberalisation, but were concerned by the possible negative impacts of opening our borders to New Zealand, including specific concerns

about harm to domestic industry from increased liberalisation and competition from New Zealand business. One respondent expressed specific concern over lamb, butter, and wool imports.

Businesses

One business association noted in their response that trade remedies were one of their top priorities. The responses were positive about their inclusion and were broadly in agreement that trade remedies should be an essential component of any FTA, with provisions equivalent to those set out in EU FTAs.

Business Associations

There were around 12 business associations which referenced or touched upon trade remedies in their responses. Several respondents expressed a preference that the trade remedies chapter should reaffirm parties' obligations to WTO rules on anti-dumping, countervailing and safeguards, and two other respondents specifically expressed a request for anti-dumping and countervailing provisions. Some respondents called for provisions committing our negotiating partner countries to apply the Lesser Duty Rule and an economic interest test in calculating anti-dumping and countervailing duties. The same respondents also expressed a need to include bilateral safeguard provisions which (a) facilitate consultation between the parties before the imposition of a measure, (b) require compensation to be provided to the exporting party, or enable the exporting party to suspend equivalent concessions, and (c) provide recourse to the FTA's dispute settlement mechanism. There was an emphasis on the importance of transparency provisions in a UK-New Zealand trade remedies chapter, such as notification requirements and information-sharing. Opinion was divided on whether WTO trade remedies provisions affirmed in the FTA should be included in the FTA's dispute settlement mechanism or excluded (in which case WTO dispute settlement mechanism would be the only recourse). Two respondents stated that any requests to agree not to use trade remedies against imports from New Zealand should be rejected.

NGOs

Three NGOs provided views on trade remedies, largely expressing concerns about the need to maintain standards given the increased competition in goods that an FTA would lead to. The impact of trade liberalisation on the domestic sheep and lamb industry was of particular interest. One respondent sought protections for domestic industry, with detailed data provided on the disparity in production, exports, and demand between the UK and New Zealand. They noted that, should the UK not be able to impose trade remedies, the lack of protection for the sheep industry could have wider economic, environmental, and social impacts.

Public Sector Bodies

One public sector body provided content relevant to trade remedies, expressing concern regarding an increase in imports of bovine, porcine and ovine meats as a potential impact of a UK-New Zealand FTA, which could lead to a decrease in UK production. They indicated that they may seek to request protection for domestic industry, with a preference for tariff-rate quotas.

Dispute Settlement

Individuals

One individual made a specific comment on state-to-state dispute settlement; they were concerned that any new procedures might limit the choices future UK Parliaments want to make with regards to dispute settlement.

Businesses

Thirteen businesses commented on state-to-state dispute settlement: they were overall supportive for the inclusion of dispute settlement mechanisms in a UK-New Zealand FTA and expressed their desire for a mechanism to be similar to the WTO's dispute settlement mechanism. Businesses also highlighted that they would like to see a fair, simple and transparent dispute settlement mechanism, which could respond to harmful trade practices. One of the issues raised by businesses was the length of time it takes to resolve a dispute, so they would like to see a system which can resolve disputes quickly. One business proposed the inclusion of mediation within the dispute settlement mechanism. Transparency was a strong theme that businesses highlighted; they would like to see a level playing field and having a transparent process in place would enable this.

Business Associations

Most business associations were supportive of the inclusion of a dispute mechanism, one association highlighted that it could help build greater trust between parties with its inclusion. Business associations would like to see a dispute mechanism which resolves disputes quickly and that the system is fair for all parties involved. Some business associations specifically requested the ability for the dispute mechanism to include the ability for referral of a dispute to the WTO. One business association focused on the risks of the UK moving away from the current system for resolving disputes.

NGOs

The majority of NGO responses related to ISDS and not state-to-state dispute settlement. As mentioned above, ISDS-related comments have been addressed in the Investment section of this report. Other feedback argued establishing a mechanism for civil society participation and the disputes mechanisms should go further than state-to-state resolution on environmental matters.

Public Sector Bodies

There was one public sector body who commented on state-to-state dispute settlement and highlighted the importance of an effective dispute resolution mechanism, particularly in deep trade deals.

Small- and Medium-sized Enterprise (SME) Policy

Overall, respondents generally recognised that SMEs have specific needs that need to be considered. Business associations gave the most detailed responses, including suggestions to include the cost of new administrative procedures and support for SMEs to take advantage of any FTA. Other points raised included lowering tariffs and the impact of additional agricultural quotas.

Individuals

Four individual respondents prioritised SME policy in a UK-New Zealand FTA, with respondents highlighting the potential opportunities for UK SMEs from greater market access if a UK-New Zealand FTA was agreed. Some individual respondents highlighted the negative impact that leaving the EU might have on UK SMEs, with comments emphasising the additional support that SMEs might need to take advantage of the opportunities from an FTA with New Zealand. Two individuals raised concerns about SME policy, including comments on potential restricted access to markets for SMEs.

Businesses

Twelve businesses viewed SME policy as a priority in their comments. Most business respondents viewed tariff reductions and a mutual recognition of rules as a beneficial result of an FTA with New Zealand. However, there were concerns from six businesses, in particular about a lack of support for SMEs and the administrative burden placed on SMEs when importing from and exporting to New Zealand.

Business Associations

Nineteen business associations prioritised SME policy in their comments. The majority of business associations recognised the potential benefits, but three respondents suggested that SMEs would need additional support to take full advantage of an FTA with New Zealand. Suggestions for support included providing market information, access to professional advice, allowances for non-tariff barriers which disproportionately impact SMEs and a simplification of administrative processes and the red tape involved in an FTA. Ten business associations raised concerns about SME policy, particularly around the lack of support for SMEs.

NGOs

No NGOs raised SME policy as a priority in their comments. Two NGOs raised specific concerns, such as the potential impact of UK unilateral implementation of grace periods on SMEs and the negative impacts on agriculture and farming.

Public Sector Bodies

One public sector body prioritised SME policy in their comments. They were concerned about the impact of increased competition on local business. One respondent called for SMEs to have appropriate resources and funding. No public sector bodies raised concerns on SME policy.

Other policy issues raised by respondents

Respondents made many other points that were outside the scope of the trade policy areas provided. Recurring comments included: an emphasis on a FEP with the EU above others; the gravity model of trade, cultural and historical ties with trade partners, transparency, parliamentary scrutiny and animal welfare. Other comments raised less frequently were gender equality, immigration and the UK's withdrawal from the EU. Relevant comments on human rights, public health, quality of life and impact assessments that were raised in the consultation section on labour and environment have been considered in this section.

Individuals

One hundred individuals raised comments on other priorities, such as the need to retain close links with the EU over and above New Zealand. Comments were made by respondents who were concerned by the geographical distance between the UK and New Zealand especially for the transportation of agricultural products, with seven respondents noting that as a result, there should be an encouragement to buy local goods and produce. Five individuals noted that increasing the volume of trade between the UK and New Zealand should be a priority in an FTA with New Zealand. Eleven respondents also raised concerns that that UK is too small to negotiate an FTA on its own, with four individuals concerned that the pressure to secure an FTA with New Zealand would result in a trade agreement which would not be in the best interests of the UK. The size of New Zealand was also raised a concern by respondents as they were of the view that due to its small size, New Zealand would be an insignificant trading partner. Several individuals advocated that regulatory standards for civil liberties should not be lowered. Five individuals also commented that the wellbeing and health of individuals should be improved or maintained as a result of a trade agreement and should not be compromised. Ensuring that human and civil rights are maintained was also mentioned by two respondents along with immigration law also being raised as a concern. Other individuals also raised concerns on animal welfare.

Businesses

Twenty-two businesses raised comments on other priorities. Many business respondents referred to the importance of a FEP with the EU with some concerned about the costs of exporting to New Zealand, in part due to the geographical distance. Some businesses also highlighted that the common language and historical ties between the UK and New Zealand could help to facilitate an FTA. One respondent raised a concern over the small size of the New Zealand economy. There was a call for a focus on anti-corruption, bribery and fraud in any trade agreement. Businesses also called for a trade agreement to be fair and unbiased. Two respondents stated that negotiations must involve professional bodies, experts and businesses. Respondents also raised concerns over the impact of a UK-New Zealand FTA on UK public health policy. One business focused on the need for collaborative answers to global challenges such as Ebola, Zika and other pandemics.

Business Associations

Fifty business associations raised comments on other priorities, with many focusing on the significance of the EU as a trading partner and expressing concerns around the impact of a UK-New Zealand FTA on UK trade with the EU. Four business associations also noted the importance of negotiations being open and transparent. Several comments were made on the negative impact that a UK-New Zealand FTA might potentially have on UK agriculture. Other concerns included the UK making too many concessions, the negative impact a trade deal would have on UK businesses and industries and a concern expressed around leaving the single market.

NGOs

Twenty-eight NGOs responded with other priorities, with several raising transparency and parliamentary scrutiny as being paramount in potential FTA negotiations with New Zealand. There were calls for a greater release of information as negotiations progressed. Six NGOs focused on social aspects including quality of life, health and wellbeing as well as on human rights protections

(four comments). Four respondents raised concerns over the length of time that negotiating an FTA with New Zealand may take. Some NGO respondents expressed concerns about the eroding of preferential access for developing countries into the UK market, due to tariff liberalisation between the UK and New Zealand. Four NGOs commented that there should be a focus on sustainable development.

There was also a recognition that provisions across FTAs (including for example labour standards, IP, and procurement and regulation of public services) can have positive social impacts, including on gender equality. Respondents noted that women are often at a financial disadvantage in the labour market, with four raising concerns about trade liberalisation increasing the gender wage gap. A call was made for a UK FTA with New Zealand to protect and promote strong labour rights, as well as uphold international commitments on gender equality and other human rights. Some NGO respondents asked for the monitoring of gendered impacts over time, and for impact assessments to be conducted which cover issues including gender equality, human rights, labour rights, environment and the economic impacts of trade agreements in the UK and third countries.

Public Sector Bodies

Eight public sector bodies made comments on other priorities, with some stating that any trade agreement should not compromise existing trade agreements with the EU and other trading partners. Single comments were also made highlighting concerns around the geographical distance of New Zealand, lack of transparency in negotiations, and the potential for concessions to be needed to achieve an FTA with New Zealand.

Summary of campaign responses

One campaign group, *38 Degrees* encouraged their members to submit a response to the consultation.

38 Degrees <i>Submission to DIT's consultation on future trade deals</i>
<p>145,905 members submitted a response to the consultation. Of these, 52,396 respondents included specific individual comments in addition to the campaign's proposed template response.</p> <p>The template response called for the protection of the NHS in future trade agreements, expressing concerns about allowing companies from other countries to deliver NHS (healthcare) services, and undermining the principles of the NHS, removing caps on how much money companies could charge to deliver NHS services and on the potential increase in the price of medicines. The template response asked for laws to be introduced to protect the NHS in future UK trade agreements.</p>
38 Degrees <i>Additional comments</i>
<ul style="list-style-type: none">• Most additional comments made by 40,565 individuals commented on the need to protect the NHS. Respondents commented that the NHS should remain free at the point of use.• 683 comments were raised with regards to EU-Exit, with some stating their desire to stay in the EU and 90 comments were raised regarding a second referendum.

We also received one petition on the consultation:

- 'Don't put our NHS up for Negotiation' – 38 Degrees - 229,699 signatures. This echoed the issues raised above, calling for the "NHS is kept out of any future trade deals after Brexit".

DIT recognises that respondents who elected to reply via a campaign hold strong views and opinions on the issues highlighted in those campaigns. For this reason, DIT has already made the following commitments:

- The Government will not compromise the high quality of British food or agricultural standards in any UK-New Zealand free trading relationship. We are committed to maintaining high standards on animal welfare and food safety after the UK leaves the EU.
- The NHS will never be privatised, and any future trade agreements will not change that.

- The Government will continue to ensure that decisions about public services, including the NHS, are made by the UK Governments, including the devolved administrations, and not our trading partners. Protecting the UK's right to regulate public services is of the utmost importance. The UK's public services are protected by specific exemptions and reservations in EU trade agreements and, as we leave the EU, the UK will continue to ensure that the same rigorous protections are included in trade agreements to which it is party.
- The Government will ensure that Parliament can inform the Government's approach to negotiations and scrutinise new trade agreements.
- The Government will develop an inclusive and transparent future trade policy for the UK.

There were other issues raised by respondents, which were discussed in the Government's White Paper *Preparing for our future UK trade policy*. For instance, the Government's commitment to supporting developing countries to reduce poverty through trade, including through enhancing market access, tackling barriers to trade and promoting investment to allow better uptake of trading agreements was detailed in this White Paper. In other areas flagged by respondents as a concern, the Government is already undertaking work to address many of the issues identified. For example, the Government is focused on promoting gender equality through trade, with activities planned to support these efforts.

Next Steps

The Government is carefully considering the points raised from the public consultations as it develops a new independent trade policy for the UK.

We recognise the importance of developing a trade policy that commands broad public support, with policy objectives that can be met while mitigating the concerns raised by respondents and maximising the benefits felt across UK society and its regions.

The public consultations attracted significant public interest. DIT was grateful to those who took the time to submit responses and attend events. We recognise the strength of feelings on some of the topics raised. The purpose and use of the response feedback gathered from this consultation will be to inform our overall approach to negotiating a potential new trade agreement with New Zealand. Decisions that are made as a result of this consultation will therefore be published alongside our negotiating objectives before potential negotiations begin. The Government also intends to keep views expressed by respondents in mind for future development and review of trade policy.

DIT worked closely with other government departments during the consultation period and subsequently to analyse the consultation feedback. Prior to entering into any formal negotiations with New Zealand as part of a follow-up Government Response, the Government will publish its conclusions from this consultation. The Government has also made clear that an Outline Approach, setting out the UK's high-level negotiating objectives, will also be published before negotiations commence.

In preparation for the start of any potential negotiations, DIT is undertaking a programme of work helping to shape the UK's overall approach to negotiations; considering what organisational mechanisms and structures are needed to facilitate trade negotiations and engage effectively with stakeholders throughout. Suggestions made by respondents in this consultation and issues raised will be considered as part of this work.

We will explore ways in which we can build upon the consultation engagement activity. Plans are already in place to work with a range of experts and practitioners to help shape our future trade policy and realise opportunities across the UK. The membership of the Strategic Trade Advisory Group representing a cross section of interests and expertise from civil society, businesses, workers, consumers and academics was announced on 3 April and held its first meeting on 6 June. The group provides a forum for high-level strategic discussions on trade policy matters. The Minister for Trade Policy, George Hollingbery MP, has also announced the first wave of Expert Trade Advisory Groups that will be used to ensure that detailed expert knowledge is available on specific sector and thematic areas to contribute to our policy development at a technical level. The structure and membership of these stakeholder groups will evolve over time according to the needs of the UK's trade negotiations.

We will continue to engage and take into account views from devolved governments, business, civil society groups and consumers to ensure we build a trade policy that works for the whole of the UK.

We recognise there is strong public interest around issues raised in this consultation. The Government will continue to engage with stakeholders in order to understand their concerns and to help develop UK trade policy. The Government will continue to promote the benefits of free trade and to raise public awareness on trade and inform consumers and businesses about the opportunities that reducing barriers to trade can bring, alongside the broader economic and social welfare gains.

Annex A: Consultation Questions

Provided below are the questions that were asked via the online portal on Citizen Space to the consultation on a trade deal with New Zealand.

Questions 1-5 were asked to all five respondent groups (Individuals, NGOs, Business, Business Associations and Public Sector Bodies). Different questions were then asked to each respondent group based on their answer to question 5, who they were responding as.

The answers to each question were either provided by a tick box or a free text box. A combination of a tick box and free text box was also used on multiple questions. These options have not been displayed below. Only the questions asked is provided.

An overview and a privacy and confidentiality section were also provided before the survey.

1. Do you consent for the voluntary information you provide in this consultation to be used as part of the Government's published consultation response?
2. Do you consent for the Department for International Trade, or organisation working on their behalf, to contact you regarding the responses you have given?

Who are you responding as?

3. What is your name (first name and surname)?
4. What is your email address?
5. Please tell us who you are responding as?
 - o An Individual/Non-Governmental Organisation/Business/Business Association/
Public Sector Body

Individual

Individual – about you.

1. Where do you currently live (your main address)?
2. What was your age at your last birthday?
3. What is your gender?
4. To which of these ethnic groups do you consider you belong?
5. Are you a member, supporter or donor of an organisation with an interest in trade?
6. If you are a member, supporter or donor of an organisation with an interest in trade, has that organisation contacted you about UK trade talks or a possible free trade agreement with New Zealand?

Individual – The UK's future trade relationship with New Zealand – priorities.

7. What would you want the UK Government to achieve through a free trade agreement (or related trade talks) with New Zealand, and why?
8. Which of the areas of a free trade agreement best describes the priorities that you have outlined above? (the survey listed the 14 policy areas plus Other. The respondent was able to select all that apply).

Individual – The UK's future trade relationship with New Zealand – concerns.

9. What concerns, if any, do you have about a free trade agreement (or related trade talks) with New Zealand, and why?
10. Which of the areas of a free trade agreement best describes the concerns that you have outlined above? (the survey listed the 14 policy areas plus Other. The respondent was able to select all that apply).

Individual – The UK's future trade relationship with New Zealand – other comments.

11. Is there anything else that you would want to say about the UK's future trade relationship with New Zealand?

Non-Governmental Organisations (NGOs)

Non-Governmental Organisations (NGOs) – about you,

6. What is the name of the organisation (eg trade union, interest group, charity or academic institution) you are responding on behalf of?
7. Which area does your organisation represent?
8. How many members does your organisation represent in total?
9. Does your organisation have a presence in, or operate in, New Zealand?

NGOs – Questions about the UK's future trade relationship with New Zealand.

10. Have any of your members been in contact with your organisation about the prospect of a free trade agreement (or related trade talks) with New Zealand?

NGOs – The UK's future trade relationship with New Zealand – priorities.

11. What would you want the UK Government to achieve through a free trade agreement (or related trade talks) with New Zealand, and why?
12. Which of the areas of a free trade agreement best describes the priorities that you have outlined above? (the survey listed the 14 policy areas plus Other. The respondent was able to select all that apply).

NGOs – The UK's future trade relationship with New Zealand – concerns.

13. What concerns, if any, does your organisation have about a free trade agreement (or related trade talks) with New Zealand, and why?
14. Which of the areas of a free trade agreement best describes the concerns that you have outlined above? (the survey listed the 14 policy areas plus Other. The respondent was able to select all that apply).

NGOs – The UK's future trade relationship with New Zealand – other comments.

15. Is there anything else that you would want to say about the UK's future trade relationship with New Zealand?

Businesses

Businesses – about you.

6. What is the name of your business?
7. What is your Company Number with Companies House?
8. Is your business a subsidiary of a company whose headquarters are based outside the UK?
9. If your business is a subsidiary of a company whose headquarters are based outside the UK, in which country is your parent company's headquarters?
10. Approximately how many employees are currently on your business's payroll in the UK across all sites?
11. Does your business currently employ people in New Zealand?
12. In what sector does your business predominantly operate in?

Businesses – Exporting, Importing and Investment.

13. Which of the following has your business done or tried to do outside the EU in the last 12 months?
14. Which of the following has your business done or tried to do in New Zealand in the last 12 months?
15. If you said you did not try to export to, import from or invest in countries outside the EU, or specifically to New Zealand, is this something that you would like to do in the future?
16. If you said you have (or attempted to) export to, import from, or invest in countries outside the EU, including New Zealand, did you get assistance from the UK Government in any form?
17. What existing Government or business association-led initiatives, if any, support you in doing business with New Zealand?

Businesses – The UK's future trade relationship with New Zealand – priorities.

18. What would you/your business want the UK Government to achieve through a free trade agreement (or related talks) with New Zealand? The options below are structured around the typical content of a free trade agreement. Where possible please provide information on the importance of this issue to your business.
 - Tariffs – What would you want the Government to achieve in this area?
 - Rules of Origin – What would you want the Government to achieve in this area?
 - Custom Procedures – What would you want the Government to achieve in this area?
 - Product Standards, Regulation and Certification Information – What would you want the Government to achieve in this area?
 - Sanitary and Phytosanitary Measures – What would you want the Government to achieve in this area?
 - Services Trade – What would you want the Government to achieve in this area?
 - Digital – What would you want the Government to achieve in this area?
 - Competition – What would you want the Government to achieve in this area?
 - Public Procurement – What would you want the Government to achieve in this area?

- Intellectual Property – What would you want the Government to achieve in this area?
 - Investment – What would you want the Government to achieve in this area?
 - Social, Labour and Environment – What would you want the Government to achieve in this area?
 - Trade Remedies and Dispute Settlement -- What would you want the Government to achieve in this area?
 - Small- and Medium-sized Enterprises (SME) Policy – What would you want the Government to achieve in this area?
 - Other - What would you want the Government to achieve in this area?
19. Which of these areas is your top priority? (the survey listed the 14 policy areas, plus Other and Don't Know. The respondent could select only one).

Businesses – The UK's future trade relationship with New Zealand – concerns.

20. What would be your concerns about a free trade agreement (or related talks) with New Zealand be? The options below are structured around the typical content of a free trade agreement. Where possible please provide information on the importance of this issue to your business.

- Tariffs – What would your business's concerns be, if any, in this area?
- Rules of Origin – What would your business's concerns be, if any, in this area?
- Custom Procedures – What would your business's concerns be, if any, in this area?
- Product Standards, Regulation and Certification Information – What would your business's concerns be, if any, in this area?
- Sanitary and Phytosanitary Measures – What would your business's concerns be, if any, in this area?
- Services Trade – What would your business's concerns be, if any, in this area?
- Digital – What would your business's concerns be, if any, in this area?
- Competition – What would your business's concerns be, if any, in this area?
- Public Procurement – What would your business's concerns be, if any, in this area?
- Intellectual Property – What would your business's concerns be, if any, in this area?
- Investment – What would your business's concerns be, if any, in this area?
- Social, Labour and Environment – What would your business's concerns be, if any, in this area?
- Trade Remedies and Dispute Settlement – What would your business's concerns be, if any, in this area?
- Small- and Medium-sized Enterprises (SME) Policy – What would your business's concerns be, if any, in this area?
- Other - What would your business's concerns be, if any, in this area?

21. Which of these areas is your top concern? (the survey listed the 14 policy areas, plus Other and Don't Know. The respondent could select only one)

Businesses – The UK's future trade relationship with New Zealand – other comments.

22. Is there anything else that you would want to say about the UK's future trade relationship with New Zealand?

Business Association

Business Association – about you.

6. What is the name of the trade association or businesses representative organisation that you are responding on behalf of?
7. What business area does your organisation represent?
8. How many businesses does your group represent in total?
9. Do you have a presence in, or operate in, New Zealand?

Business Association – Exporting, Importing and Investment.

10. Approximately what proportion of your members export to / invest in New Zealand?
11. Approximately what proportion of your members have indicated they would like to do more exporting to / investment in New Zealand?
12. Approximately what proportion of your members import from / have investment from New Zealand?
13. Approximately what proportion of your members have indicated they would like to do more importing from / seek investment from New Zealand?
14. What existing UK Government or regional / business group-led initiatives, if any, have your members said support them in doing business with New Zealand?

Business Association – Questions about the UK's future trade relationship with New Zealand.

15. Have your members been in contact with your organisation about the prospect of a free trade agreement (or related trade talks) with New Zealand?

Business Association – The UK's future trade relationship with New Zealand – priorities.

16. What would your organisation want the UK Government to achieve through a free trade agreement (or related talks) with New Zealand? The options below are structured around the typical content of a free trade agreement. Where possible please provide information on the importance of this issue to your business.
 - Tariffs – What would you want the Government to achieve in this area?
 - Rules of Origin – What would you want the Government to achieve in this area?
 - Custom Procedures – What would you want the Government to achieve in this area?
 - Product Standards, Regulation and Certification Information – What would you want the Government to achieve in this area?
 - Sanitary and Phytosanitary Measures – What would you want the Government to achieve in this area?
 - Services Trade – What would you want the Government to achieve in this area?
 - Digital – What would you want the Government to achieve in this area?
 - Competition – What would you want the Government to achieve in this area?
 - Public Procurement – What would you want the Government to achieve in this area?

- Intellectual Property – What would you want the Government to achieve in this area?
- Investment – What would you want the Government to achieve in this area?
- Social, Labour and Environment – What would you want the Government to achieve in this area?
- Trade Remedies and Dispute Settlement – What would you want the Government to achieve in this area?
- Small- and Medium-sized Enterprises (SME) Policy – What would you want the Government to achieve in this area?
- Other - What would you want the Government to achieve in this area?

17. Which of these areas is your top priority? (the survey listed the 14 policy areas, plus Other and Don't Know. The respondent could select only one).

Business Association – The UK's future trade relationship with New Zealand – concerns.

18. What would your organisation's concerns about a free trade agreement (or related talks) with New Zealand be? The options below are structured around the typical content of a free trade agreement. Where possible please provide information on the importance of this issue to your business.

- Tariffs – What would your organisation's concerns be, if any, in this area?
- Rules of Origin – What would your organisation's concerns be, if any, in this area?
- Custom Procedures – What would your organisation's concerns be, if any, in this area?
- Product Standards, Regulation and Certification Information – What would your organisation's concerns be, if any, in this area?
- Sanitary and Phytosanitary Measures – What would your organisation's concerns be, if any, in this area?
- Services Trade – What would your organisation's concerns be, if any, in this area?
- Digital – What would your organisation's concerns be, if any, in this area?
- Competition – What would your organisation's concerns be, if any, in this area?
- Public Procurement – What would your organisation's concerns be, if any, in this area?
- Intellectual Property – What would your organisation's concerns be, if any, in this area?
- Investment – What would your organisation's concerns be, if any, in this area?
- Social, Labour and Environment – What would your organisation's concerns be, if any, in this area?
- Trade Remedies and Dispute Settlement – What would your organisation's concerns be, if any, in this area?
- Small- and Medium-sized Enterprises (SME) Policy – What would your organisation's concerns be, if any, in this area?
- Other - What would your organisation's concerns be, if any, in this area?

19. Which of these areas is your top concern? (the survey listed the 14 policy areas, plus Other and Don't Know. The respondent could select only one).

Business Association – The UK's future trade relationship with New Zealand – other comments.

20. Is there anything else that your organisation would want to say about the UK's future trade relationship with New Zealand?

Public Sector Bodies

Public Sector Bodies – about you.

6. What is the name of the public sector body you are responding on behalf of?
7. What area does your public sector body represent?
8. Does your public sector body have a presence in, or operate in, New Zealand?

Public Sector Bodies – Questions about the UK's future trade relationship with New Zealand.

9. Have any of your members been in contact with your public sector body about the prospect of a free trade agreement (or related trade talks) with New Zealand?

Public Sector Bodies – The UK's future trade relationship with New Zealand – priorities.

10. What would you want the UK Government to achieve through a free trade agreement (or related trade talks) with New Zealand, and why?
11. Which of these areas of a free trade agreement best describes the priorities that you have outlined above? (the survey listed the 14 policy areas plus Other. The respondent was able to select all that apply).

Public Sector Bodies – The UK's future trade relationship with New Zealand – concerns.

12. What concerns, if any, does your public sector body have about a free trade agreement (or related trade talks) with New Zealand, and why?
13. Which of these areas of a free trade agreement best describes the concerns that you have outlined above? (the survey listed the 14 policy areas plus Other. The respondent was able to select all that apply).

Public Sector Bodies – the UK's future trade relationship with New Zealand – other concerns.

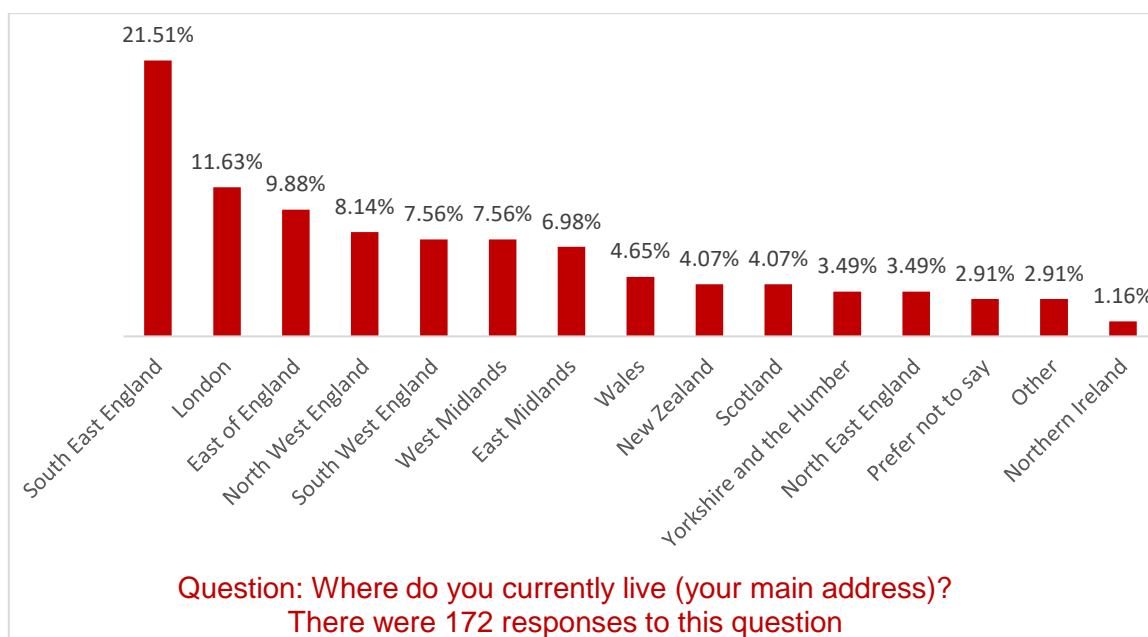
Is there anything that you would want to say about the UK's future trade relationship with New Zealand?

Annex B: Demographics

Individual respondents' demographic profile

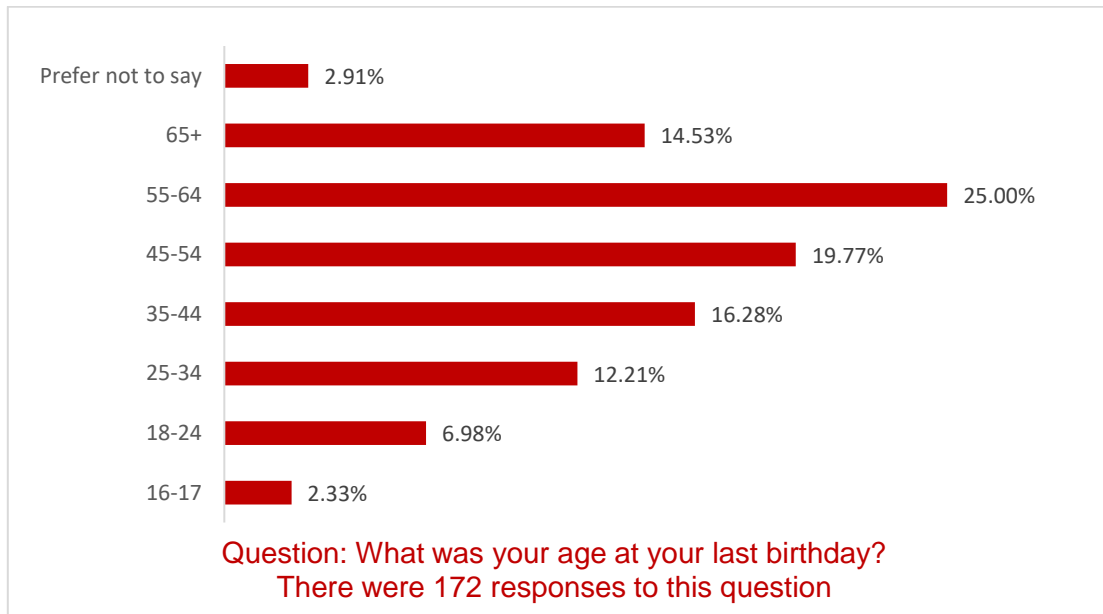
1. The geographical location of respondents varied with responses received from across the UK and New Zealand. The highest levels of participation were in the South East of England, making up over one in five (21.51 per cent) of responses. We also had a number of online respondents based in New Zealand (4.07 per cent) who submitted a response to the consultation. See Figure 1 for an overview of the respondents' location.

Figure 1: Location of individuals who responded to the consultation online



2. The age of respondents to the Consultation Portal varied. Nearly 60 per cent (59.3 per cent) of respondents were 45 years old and over and more than one in five (21.52 per cent) of online respondents was under the age of 35. See Figure 2 for a breakdown of the ages of respondents.

Figure 2: Age of individuals who responded to the consultation online



- Just less than three quarters (74.85 per cent) of individuals who responded online were male, with one in five (21.05 per cent) were female. The reason for the lower response rate from women is unclear and the Government has identified a need to review our engagement strategy to ensure any future consultations have greater participation from women. The Government is committed to creating a framework for trade that supports female exporters and upholds gender equality.

Table 8: Gender of individuals who responded to the consultation online

Gender Group	Percentage of Responses
Male	74.85%
Female	21.05%
Other	0.00%
Prefer not to say	4.10%

Question: What is your gender?
There were 171 responses to this question

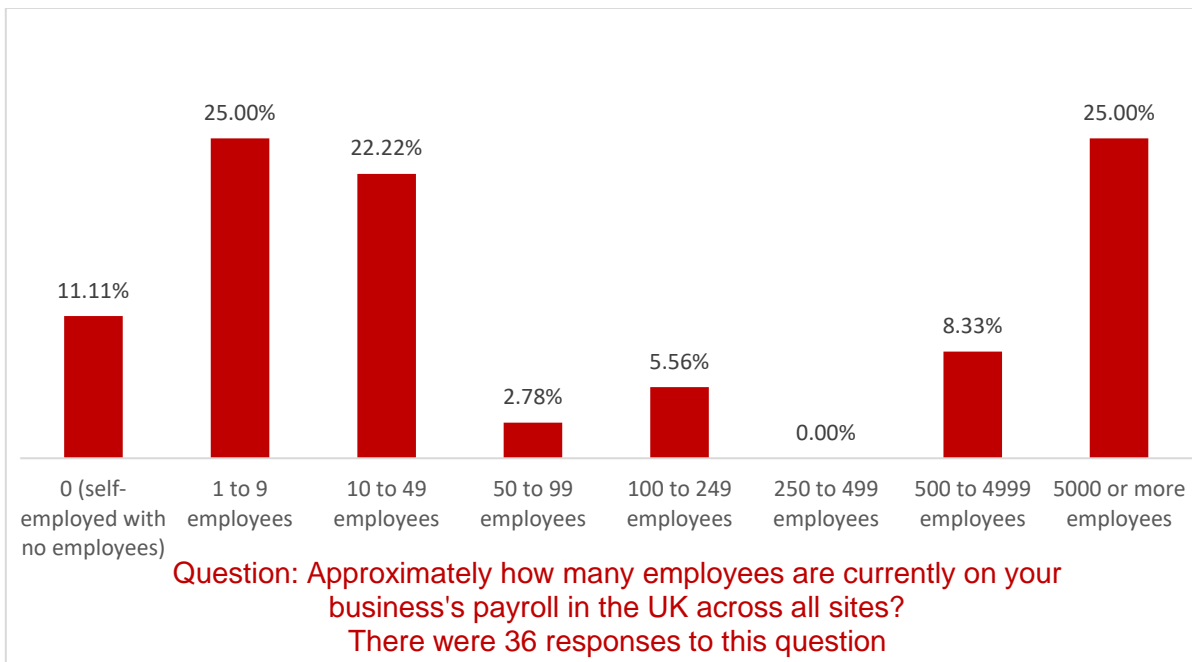
Organisation respondent profile

Figure 3. Total number of members that the NGO represents.



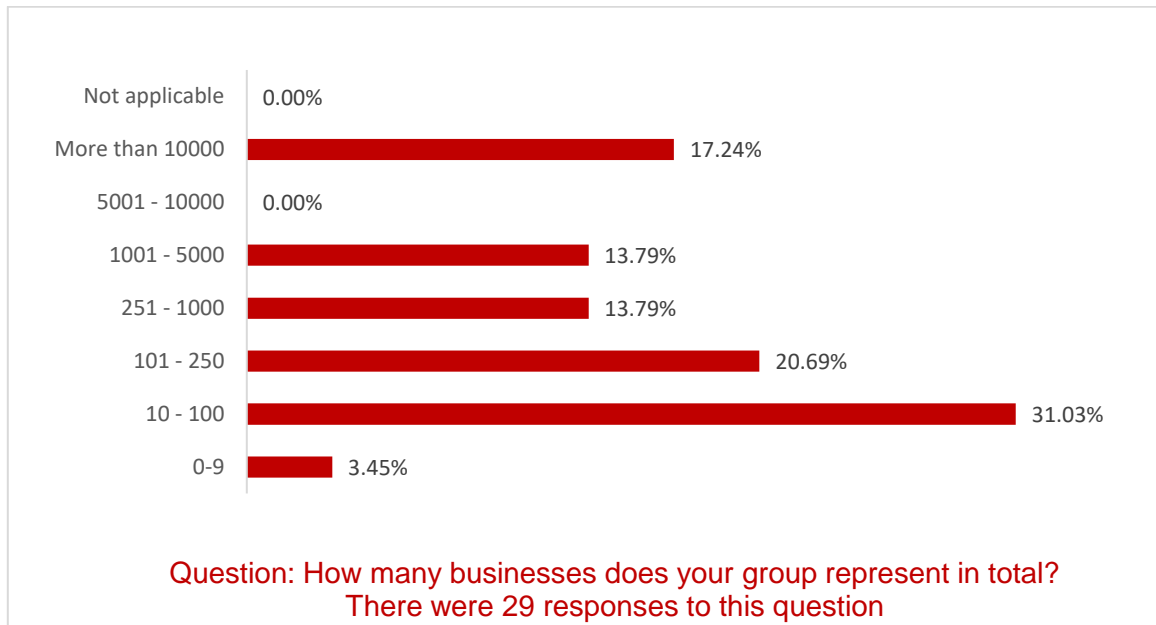
4. Over 70 per cent (70.37 per cent) of NGOs who responded online had more than 1000 members. 3.70 per cent of organisations had 100 or less members.

Figure 4. Number of UK employees per business



5. A quarter of businesses who responded online had 1-9 employees and a quarter of businesses had 5,000 or more employees.

Figure 5. Number of businesses the business association represents



- Under half (44.82 per cent) of businesses associations who responded online represented 251 or more businesses.

Annex C: Glossary

This glossary contains general descriptions of some commonly used trade and investment terms. Some of the terms have meanings that vary within different areas of trade and investment, or between different trade and investment agreements. The descriptions in this glossary are intended to provide a general approximation of these meanings and therefore will not always align with legal definitions or references in legal texts; or with the meaning of these terms in a particular context or area of trade.

Term	Definition/Description
Accession	Means to join or become a part of – eg accession to an international trade agreement by new members, accession to an international organisation or a state's accession to a multilateral treaty already negotiated and signed by other states.
Anti-dumping duty	Under WTO rules, countries can counteract the practice of 'dumping' by imposing additional duties on imported goods found to be 'dumped' and causing injury to domestic producers, after having conducted a domestic investigation (see also Dumping below).
Applied tariffs/Applied rate	Duties that are actually charged on imports of goods. These can be the same, below, but not above, the bound rates (see also Bound Tariffs/rates).
Artist's Resale Rights	The Artist's Resale Right (ARR) is a specific form of copyright, which gives the author of an original work of art the entitlement to royalties each time one of their works is sold through an art market professional (such as an auction house or art gallery). This royalty has the same duration as copyright; life or the author plus 70 years.
Bilateral agreement	An agreement negotiated between two sides. One or both sides could be made up of multiple states, eg the EU-CARIFORUM FTA which has more than 40 parties.
Bilateral Investment Treaty (BIT)	An agreement between two states in which each state affords certain protections to the other state's investors and their investments. This normally includes an obligation not to discriminate or expropriate without compensation. Investors may be provided with a right to enforce these provisions through Investor-State Dispute Settlement, ISDS (defined below). Modern FTAs often include a separate Investment chapter which will have similar provisions.
Bound Tariffs (also known as bound rates)	The maximum rate of duty (ie tax) that can be applied by a WTO Member to an imported product from another WTO Member. Each WTO member has a goods schedule in which it sets out its commitment to these most favoured nation rates.

Business Representative Organisation (BRO)	An administrative body who acts for or on behalf of businesses they represent. Usually runs a membership programme.
CE marking	A certification mark on products traded on the extended Single Market in the European Economic Area (EEA). 'CE' signifies that the product has been assessed and meets the EU's safety, health and environmental protection requirements.
Commercial presence	In the services trade context, refers to having an office, branch or subsidiary in a foreign country. It refers to mode 3 supply of services (see also Mode of supply for services).
Common market / single market	This is a deeper level of economic integration than an FTA. It is a free trade area established between states to give free movement of goods (without tariff and quotas), services, capital and labour between them.
Competition	Ensuring businesses are treated fairly in each other's markets, including the application of competition law, the role of state-owned enterprises and the use of state aid and subsidies.
Competitive Tendering	Competitive tendering is a procurement method where firms bid for the right to run a service or gain a certain contract.
Conformity Assessments	Tests on goods and services to see if they meet the standards required by the country they are to be sold in. In the UK, these tests are carried out by various assessment bodies accredited by the UK Accreditation Services (UKAS).
Cost, Insurance and Freight (CIF)	A recognised international trading term (see Incoterms) meaning the value of goods, including insurance of the goods and transport to the point where they are lifted over the ship's rail at the port of importation. The equivalent for transport other than sea is CPT (cost paid to).
Countervailing Measure (CVM)	Additional duties that WTO rules authorise countries to impose on imported goods to offset state subsidies received in the country of export after having conducted a domestic investigation and establishing that the subsidised imports are causing injury to the domestic industry.
Crypto-assets	Crypto-assets or 'cryptocurrency' are cryptographically secured digital representations of value or contractual rights that can be stored, transferred or traded electronically eg Bitcoins.
Cumulation	When determining the origin of goods for customs purposes, this means the capacity to include materials and/or processing from other countries as qualifying content in determining if an imported good is an 'originating good' and consequently qualifies for preferential tariff treatment.

Customs authority	<p>A government body that administers laws and regulations relating to goods crossing a border, particularly import, export, movement and storage of goods. This can be by:</p> <ol style="list-style-type: none"> 1) Collecting duties and taxes. 2) Controlling import & export of restricted goods, eg animals, and weapons. <p>In the UK, Customs functions are undertaken by HM Revenue & Customs and Border Force.</p>
Customs Duty	A charge imposed by a country on the import or export of goods.
Customs procedures	Processes and procedures applied by customs authorities to control the export, import and transit of goods. Their improvement and simplification may lower costs and facilitate trade.
Customs union	Distinct from agreements on regulatory alignment, or single market regulatory integration, a customs union treats two or more countries as a single customs territory, eliminating duties and most other restrictive measures on substantially all trade in goods between its members, and collectively applying substantially the same duties and other measures to trade in goods from third countries.
Designation of Origins	See Geographical Indications.
Dispute settlement	The term is commonly used in reference to the formal state to state mechanism for resolving disputes where one or more parties consider that there has been a breach of obligations under the relevant international trade agreement and it has not been possible to resolve the dispute informally.
Distortion	This refers to a situation in which prices and production are higher or lower than levels that would usually exist in a competitive market.
Domestic support	Where a country acts to maintain producer prices at levels above those dominant in international trade.
Dumping	Dumping occurs when goods are exported at a price less than their 'normal value', generally meaning they are exported for less than they are sold in the domestic market or are sold in export markets below the cost of production. WTO rules authorise action to counteract the practice of dumping when dumped imports are shown to cause injury to domestic producers (see Anti-Dumping Duty).
Duty-Free Quota-Free (DFQF) access	This refers to preferential market access for goods, free of import duties or quotas. DFQF on a lasting basis for all "least developed countries" or "LCDs" is included as a target in the UN Sustainable Development Goals. DFQF can be offered

	unilaterally to developing countries, under the WTO 'Enabling Clause'.
Economic Operator Certification	Documentation for the authorisation of a party involved in the international movement of goods in whatever function that has been approved by a national customs administration.
Electronic commerce (e-commerce)	Production, advertising, sale and distribution of products via telecommunications networks.
Environmental Goods Agreement (EGA) / Green Goods	A proposed agreement being negotiated by a group of WTO members seeking to end tariffs for environmentally beneficial products.
European Patent Convention	The European Patent Convention is a multilateral treaty finalised in 1973 establishing the European Patent Organisation, an intergovernmental organisation (non-EU body) that grants European patents.
Excise Duty	A tax or duty on the manufacture of goods. Excise applies in the UK to goods which contain alcohol, mineral oils or tobacco. The charge to excise is payable on purchase or importation.
Ex works	A recognised international trading term (see Incoterms) meaning the value of goods at the point that they left the factory without the addition of any transport, insurance or other costs.
Fair dealing	'Fair dealing' is a UK concept and relates to limited situations set out in UK legislation where the use of a work, protected by copyright, does not require permission or a licence from the rightsholder so long as the use is also considered 'fair'. There is no statutory definition of fair dealing - it will always be a matter of fact, degree and impression in each case.
Fair use	'Fair use' is a defence against a claim of copyright infringement in the US. It constitutes any copying of copyrighted material done for a limited and 'transformative' purpose, such as to comment upon, criticise or parody a copyrighted work.
Financial Technology (FinTech)	Providing or enabling financial services using software and modern technology
Food security	Refers to a situation where the nutritional needs of a country or population are met consistently.
Foreign Direct Investment (FDI)	Investment by an entity in a foreign operation, or establishment of a new operation in another country ("greenfield investment"). Foreign Direct Investment implies significant control of the operation by the foreign entity.
Free circulation	A customs status relating to goods which have had all the taxes and duties paid, are not subject to any other restriction or

	prohibition and can therefore move freely within the relevant customs territory.
Free Trade Agreement (FTA)	A treaty among two or more countries to form a free trade area. This means having zero tariffs (or reduced tariffs) and reducing other regulatory restrictions on trade in substantially all goods and/or services.
Free trade area	Describes territories that have liberalised trade between them in most areas of trade in goods (similar arrangements for trade in services are known as economic integration agreements). Each participating territory applies its own independent trade policy with territories that are not part of the free trade area.
GATS	General Agreement on Trade in Services, a WTO agreement governing trade in services.
GATT	General Agreement on Tariffs and Trade, a WTO agreement governing trade in goods.
Generalized System of Preferences (GSP)	Measures applied by developed countries granting unilaterally preferential (reduced or nil rate) tariffs to imports from developing countries.
Geographical Indications (GIs)	An identification of a product from a particular country, region or locality where a given quality, reputation or another characteristic of the product is essentially attributable to the place where it is produced. For instance, 'Cornish Pasty', 'Welsh Lamb', 'Scotch Whisky' or 'West Country Farmhouse Cheddar Cheese' are UK GIs.
Government procurement	Procurement by government or other public entities of goods and services from the private sector. This usually covers both goods and services, and purchasing, leasing and acquiring by other commercial means.
Government Procurement Agreement (GPA)	A plurilateral WTO agreement, currently among 19 parties, covering the procurement of goods and services by governments and other public authorities.
Gravity model of trade	The prediction of joint trade flows based on the economic sizes and distance between two states. GDP measurements are often used to measure economic size.
Green Finance	Financial instruments or investments in environmental and sustainable projects and infrastructure
Harmonized System (HS)	Forms the basis of how most countries describe and classify goods for the purpose of applying customs tariffs. A system, managed by the World Customs Organisation, that gives different categories of goods a 6-digit number so their characteristics can be recognised and understood.

Import Entry Transaction Fee	The payment charged to process and risk assess imported goods.
Import licensing	Administrative procedures requiring the submission of an application or other documentation (other than those required for customs purposes) to the relevant administrative body as a prior condition for importation of goods.
Import quota	A trade restriction that sets a limit on the quantity of a good that can be imported into a country. Import quotas are generally prohibited by the GATT, other than in limited circumstances.
Incoterms	International commercial terms that are standard terms developed by the International Chambers of Commerce and in common use that define the responsibilities of the seller and the buyer for the sale and delivery of goods. Examples include ex works, FCA (free carrier), CIF (cost insurance and freight), DDU (delivered duty unpaid) and DDP (delivered duty paid).
Intellectual Property (IP)	Creations of the mind, such as inventions, literary and artistic works, designs, and symbols, names and images used in commerce. These creations are protected by law by a variety of intellectual property rights such as patents, copyright, trade marks, design rights and geographical indications.
Investor State Dispute Settlement (ISDS)	A mechanism that allows a foreign investor to bring legal proceedings and seek compensation from a state, if the state has breached its obligations under a Bilateral Investment Treaty (defined above) or an Investment chapter in an FTA. The legal proceedings are usually brought via an arbitration process that is independent of each state's domestic courts.
Inward Processing Relief (IPR)	A customs procedure that allows goods to be temporarily imported duty-free on the condition that they are to be processed and re-exported.
Labour and Environment	In the context of a trade agreement, protection of workers and the environment, consistent with international commitments of a country.
Market access	Conditions set by governments to control which goods or services can or cannot enter their domestic market.
Mode of supply of services	This describes how international trade in services is supplied and consumed, with mode 1: cross - border supply (eg a user in country A receives services from abroad through its telecommunications or postal infrastructure); mode 2: consumption abroad (eg nationals of country A travel or move to country B as tourists, students, or patients to consume the services); mode 3: commercial presence (eg the service is provided within country A by a locally-established affiliate, subsidiary, or representative office of a foreign-owned and controlled company in country B); and mode 4: movement of

	<p>natural persons (eg a national of country B provides a service within country A as an independent supplier (like a consultant or health worker) or employee of a service supplier (like a consultancy firm or construction company)).</p>
<p>Most Favoured Nation (MFN)</p>	<p>A non-discrimination principle enshrined in many WTO rules that prohibits a WTO member from treating some WTO members more favourably than others. The MFN obligation requires each WTO member, in its trade with all other WTO members, to give the best (“most-favoured”) treatment that it accords in trade with any other WTO member. If, for example, a country lowers tariffs on goods from India, it must also do so on similar goods from Argentina. Exceptions to the MFN principle exist under WTO law, such as in the form of Customs Unions, Free Trade Agreements, Generalized System of Preferences and certain trade remedies.</p> <p>FTAs often contain their own MFN commitments between the treaty partners.</p> <p>Bilateral Investment Treaties also include MFN obligations to investors and their investments from each participating state (party). Under MFN, a host state may not treat an investor from a BIT party less favourably than it does a foreign investor from another country.</p>
<p>Multilateral agreement</p>	<p>An agreement among several countries. At the WTO, multilateral agreements normally refers to agreements reached by all WT members.</p>
<p>Mutual Recognition Agreement (MRAs)</p>	<p>An international agreement by which two or more countries agree to recognise one another's conformity assessments (see conformity assessments above).</p>
<p>Mutual Recognition of Professional Qualifications (MRPQ)</p>	<p>Enables individuals to have their professional qualifications recognised in a state other than the one in which the qualification was obtained.</p>
<p>National Treatment</p>	<p>A non-discrimination principle enshrined in many WTO rules that prohibits a WTO member from treating imported goods or foreign services and services suppliers less favourably than domestic goods or services and services suppliers in its domestic market. The national treatment obligation helps ensure imported goods and services are not unfairly disadvantaged compared with their domestic counterparts. Such obligations may also be included in FTAs between the country parties.</p> <p>Bilateral Investment Treaties also usually contain provisions that parties should not discriminate between domestic and foreign investments.</p>

Natural persons	Refers to people, as distinct from juridical persons such as companies and organisations.
Non-Tariff Barriers (NTBs) or Non-Tariff Measures (NTMs)	Any policy that restricts exports or imports other than a simple tariff.
North America Free Trade Agreement (NAFTA)	North American Free Trade Agreement, comprising Canada, Mexico and the US. This FTA may be replaced by the United States-Mexico-Canada Agreement (USMCA).
Outward Processing Relief	A customs procedure that allows goods to be temporarily exported for processing with goods in another country and then re-imported. On re-importation the element that constitutes the original exported goods in the final imported product are imported free from duty.
PBS	Professional and business services
Plurilateral agreement	An agreement between more than two parties. At the WTO, plurilateral agreements typically refer to agreements reached by several, but not all, WTO members.
Products standards, regulations and certification	<p>'Standards' are documents developed through consultation and consensus which describe a way of, for example, making a product, managing a process, or delivering a service. Compliance with standards is not mandatory. Typically, they are not set or controlled by government or legislators but can be used by legislators to establish a basis for compliance with the law. The term 'standard' is also used informally to refer to a level of quality or attainment.</p> <p>'Regulations' are legal requirements. In the context of international trade, the term 'Technical Regulations' is used frequently in trade agreements when addressing 'technical barriers to trade'. Technical Regulations are mandatory requirements set out in law – they are controlled by governments and legislators.</p> <p>Certification is the provision by an independent body of written assurance (eg a certificate) that the product, service or system in question meets specific requirements.</p>
Protected Geographical Indications	See Geographical Indications.
Quantitative Restrictions (QRs)	Specific limits on the quantity or value of goods that can be imported (or exported) during a specific time period).
Red tape	Excessive regulation or rigid conformity to formal rules that is considered redundant or bureaucratic and hinders or prevents action or decision-making. In trade relations, it imposes an administrative burden on economic operators that will frequently involve additional costs and may have the effect of limiting trade.

Regional Trade Agreement (RTA)	A free trade agreement between a group of countries. Although originally used to describe such agreements when concluded among countries that shared common borders or were located within the same region, it is now often used more generally. For example, in mega-regional free trade agreements such as the CPTPP, the parties do not all border each other.
Regional Value Content (RVC)	A percentage that indicates to what extent a good is produced in the producer's local region. This can be affected by the origin of the good's components or materials.
Regulatory Data Protection	A period during which Company B cannot refer to data produced by Company A to support B's marketing authorisation for a pharmaceutical (generic) or agrochemical (eg a pesticide) drug. This authorisation is a requirement for the generic drug to reach markets.
Rules of Origin (RoO)	Rules used to determine where goods are "from", for example, where they have been produced or had substantial work done to them. This is used in determining appropriate tariff rates, access to preferential trade arrangements or application of trade sanctions.
Safeguard Measures	Actions taken to protect a specific industry from an unexpected build-up of imports. They are generally governed by Article 19 of GATT and the Agreement on Safeguards.
Sanitary and Phytosanitary Measures (SPS)	Measures to ensure that food is safe for consumers, and to prevent the spread of pests or diseases among animals and plants.
Schedule	In WTO context, this is a WTO member's list of commitments to other WTO members regarding how much market access it is prepared to offer and its bound tariff rates.
Small- and Medium-sized Enterprises	Businesses with fewer than 250 employees.
Small- and Medium-Sized Enterprises (SME) Policy	Policy designed in a way which supports Small- and Medium-Sized businesses.
Special and Differential Treatment	WTO agreements contain special provisions which give developing countries special rights and allow other members to treat them more favourably than non-developing members.
Supply chain	The sequence of processes involved in the production and distribution of a good.
Sustainable Development	Development that meets the needs of the present generations without compromising the ability of future ones to meet their own needs. It contains three pillars: economic development, social development and environmental protection.

Tariff binding	A commitment by a country not to increase a customs duty beyond a specified level. (See Bound Tariffs).
Tariff Rate Quota (TRQ)	The application of a higher tariff or tax on certain goods once an agreed quota (amount) of imports is reached.
Tariffs	Refers to customs duties on imports of goods, levied either as a percentage of value or on the basis of a formula (eg 10 per cent or £7 per 100 kg).
Technical Barriers to Trade (TBT)	These are regulations, standards, testing and certification procedures applied to imports and exports which could obstruct trade. The WTO's TBT Agreement aims to ensure that these do not create unnecessary obstacles to trade.
Trade liberalisation	The removal or reduction of restrictions or barriers to trade.
Trade remedies	Measures which allow WTO members to operate a safety net and protect domestic industry from injury caused by unfair trading practices or from injury caused by surges in imports. They are taken in response to subsidies, dumping and import surges. These usually take the form of additional duties on those imports.
Transatlantic Trade and Investment Partnership (TTIP)	The Transatlantic Trade and Investment Partnership is a proposed trade agreement between the European Union and the United States.
Treaty	A treaty is an agreement under international law between states or international organisations.
WTO	The World Trade Organization.
WTO Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPs)	The Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPs) is the principal WTO agreement on intellectual property (IP) rights and applies to all WTO members. It covers key types of IP, including copyright, trade marks, geographical indications and patents and provides for the minimum standards of IP protection that each member needs to provide.
WTO Trade Facilitation Agreement	The WTO agreement which aims to simplify, modernise and harmonise procedures and controls governing the movement of goods across borders by WTO members.

The Department for International Trade (DIT) helps businesses export, drives inward and outward investment, negotiates market access and trade deals, and champions free trade.

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