

22 April 2025

Committee Secretariat  
Justice Committee  
Parliament Buildings  
Wellington  
[justice@parliament.govt.nz](mailto:justice@parliament.govt.nz)

## Retail NZ submission: Policing Amendment Bill

### Overview

1. Retail NZ is a membership organisation that represents the views and interests of New Zealand's retail sector. We are the peak body representing retailers across Aotearoa, with our membership accounting for nearly 70% of all domestic retail turnover. New Zealand's retail sector comprises approximately 30,000 businesses and employs around 222,000 Kiwis.
2. Retail NZ consulted our membership in the preparation of this submission.
3. Retail NZ supports this Bill and its intent to clarify the Police's ability to record images and sounds in public places for lawful purposes, and to expand Police's temporary road closure powers.

### Part one - recording images and sounds

4. Retail NZ is in complete support of the Bill's intent to clarify Police's ability to record images and sounds in public places and collect personal information for lawful purposes.
5. The New Zealand public has the right to record images and sounds in most public places. It is vital Police also have this right, to keep our communities safe from harm and assist officers in their intelligence gathering work. We support this right being written explicitly in the legislation, including the appropriate use, storage and destruction of images and recordings that Police have taken.
6. Retail NZ also supports the clarification in this Bill that Police can also record anything they see or hear while lawfully in any private place or in/on a vehicle, and can continuously record other forms of images and sounds when it is for lawful purposes.
7. We agree recordings should be made reasonably and not obtained by surveillance devices. We are satisfied the restrictions listed in 45D appropriately outline the parameters under which Police can, and can't, record information, images and sounds for intelligence-gathering purposes.
8. Retail NZ's 2023 Crime Report found more than a third of all retail crime is committed by repeat offenders. Our members believe it is important Police have the ability to capture images, sounds and information that can help with their intelligence gathering work and ultimately assist them in catching the most prolific offenders. Without this ability, we are concerned retail crime rates could rise.
9. We recommend the Committee also take this opportunity to consider explicitly allowing police to use license plate recognition technology for intelligence and evidence-gathering purposes, and clarify that it be able to be recognised as evidence in court.

### Part two - expanding road closure powers

10. Retail NZ supports the expansion of Police's road closure powers and creation of new offences for non-compliance.
11. It is important Police have the ability to temporarily close roads to ensure the safety of our communities, and to enforce such closures. Without the proper enforcement and deterrents

in this space - such as being able to issue fines, charge people, or detain and move people on who refuse to comply - people may not be sufficiently deterred to comply with police road closures, putting people's safety at risk.

## Conclusion

12. Thank you for the opportunity to make a submission.
13. Retail NZ supports this Bill and its intent to clarify Police's ability to record images and sounds in public places, private property where they have lawfully entered, and to take continuous recordings for lawful purposes in specific circumstances.
14. Retail NZ also supports the expansion of Police's temporary road closure powers and the creation of new offences to ensure they can appropriately enforce such closures.
15. Retail NZ is happy to discuss any aspect of this submission further and would like the opportunity to make an oral submission to the committee.
16. No part of this submission should be withheld under the OIA.

Sincerely,



Carolyn Young  
CHIEF EXECUTIVE  
[carolyn.young@retail.kiwi](mailto:carolyn.young@retail.kiwi)