

29 April 2026
Education and Workforce Committee
Parliament Buildings
ew@parliament.govt.nz

Retail NZ submission: Immigration (Enhanced Risk Management) 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 the intent of the Bill to increase the effectiveness of the immigration compliance and enforcement system, improve the integrity of the refugee and protection system, and improve the operation of the wider immigration system. However, there are some areas within this Bill that could benefit from further consideration to ensure the balance is right between national security and safety, and humanitarian factors.

Deportation liability

4. Retail NZ supports the proposal to extend the deportation liability timeframes. It is important that all people in New Zealand adhere to the law, and there be appropriate consequences for immigrants when serious offending occurs. This change would provide greater deterrents to non-compliance and helps increase public confidence in the immigration system in knowing anyone who does not follow the law will face consequences.
5. Retail NZ welcomes the clarification of the range of false and misleading submissions that can make a person liable for deportation. We believe this would provide greater deterrents for providing false or misleading information and increase confidence in the immigration system.

Migrant exploitation

6. Retail NZ supports the intent of the Bill to further deter migrant exploitation by increasing the range of tools available to address exploitative behaviours by employers. However, these measures must be proportional and reasonable.
7. We ask the Committee to reconsider the extension of the limitation period to six years from when the infringement offence was alleged to have taken place. While we acknowledge the current six-month window is likely too narrow, extending it to six years is disproportionate and risks increasing the likelihood of compliant employers being

unfairly captured due to reduced reliability of, or access to, records. This change would also lessen the need for officials to act as urgently against allegedly non-compliant employers. It is vital claims of migrant exploitation are investigated in a timely and thorough manner, and we believe there is a further balance that needs to be struck with respect to this change in limitation period.

8. Retail NZ recommends the Committee consider strengthening employers' information-gathering and recording obligations, and increasing audits in this space, with penalties for non-compliance.

Modernising information sharing provisions

9. Retail NZ is generally supportive of the proposal to modernise information sharing provisions and increased use of digital credentials.
10. However, we have concerns the information sharing provisions as currently outlined in the legislation are quite broad. We recommend appropriate checks and balances and safeguards are put in place to ensure personal information remains secure and is only able to be accessed and viewed by people who require it for legitimate purposes.
11. Retail NZ would also support the use of existing government digital identity frameworks, such as RealMe, being used in this space to ensure the protection of information and ensure information-sharing is occurring in a secure manner.
12. We recommend the Privacy Commissioner have oversight of information-sharing agreements and there be regular reporting to the Privacy Commissioner on how the information is being shared.

Conclusion

13. Thank you for the opportunity to make a submission.
14. Retail NZ generally supports the intention of the Bill but recommends that further consideration is given to the areas outlined above with regards to migrant exploitation, recording of information, auditing of information and the security of personal information.
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