



29 March 2019

DOIA 1819-1295

Matt Brown
Email: fyi-request-9734-1f8d67fc@requests.fyi.org.nz

Dear Mr Brown,

I refer to your enquiry of 1 March 2019 regarding the review undertaken by the Ministry of Business, Innovation and Employment (**the Ministry**) on the practice of publishing directors' residential addresses on the companies register.

In that enquiry, you requested, under the Official Information Act 1982 (**the Act**), the following information:

"... any relevant documents, internal working papers, or correspondence related to this review and its findings to date. Additionally please provide any details on the current expected timeline for this review to be concluded and any changes to be enacted."

In a subsequent online exchange with Robert Clarke, a senior policy advisor at the Ministry, the scope of the request was narrowed to key documents that would enable you to better understand where matters stood in this review. You wrote that "the briefings [you have identified] would be an excellent start".

By way of further update, we originally planned to provide recommendations to the Minister of Commerce and Consumer Affairs by the end of 2018. However, this was postponed to the end of March 2019, in order to include recommendations from a separate but related workstream concerning the beneficial ownership of entities. Both director identification and beneficial ownership deal with the same broad policy issue – the trade-off between individual privacy concerns and transparency in business ownership. As such, it is appropriate for the Minister, and thereafter Cabinet, to consider the matters at the same time.



In the meantime, I have identified two documents relevant to your request. The titles, dates and relevant OIA sections for each of those documents are listed below, and redacted copies of the documents released accompany this letter.

No.	Date	Title	Decision	OIA Section/s
1.	30 January 2018	Briefing: Director identification numbers and residential addresses	Release in part	Cover page: 9(2)(a)
2.	2 May 2018	Briefing: Beneficial ownership and director residential addresses (release of discussion documents)	Release in part	Cover page: N/A Main body and annexes: Certain paragraphs are out of scope

As you can see, the only information that has been withheld is either considered to be out of scope of your request, as it concerns beneficial ownership rather than director identification, or falls within the privacy exemption of section 9(2)(a). I have determined that there are no public interest considerations that outweigh the need to withhold this information.

You have the right under section 28(3) of the Act to seek a review of this response by the Ombudsman.

The Ombudsman has an online complaints form at www.ombudsman.parliament.nz/make-a-complaint/make-a-complaint-now/make-a-complaint-online-now. A complaint can also be made by e-mail at info@ombudsman.parliament.nz or by post at:

The Ombudsman
PO Box 10 152
Wellington 6143

Yours sincerely,



Susan Hall
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Ministry of Business, Innovation and Employment