# Submission to the Independent Electoral Review

Stephen Davis

## Introduction

1. My name is Stephen Davis. I have previously been a member of a political party, and I have worked as a local electoral official, however, this submission is my own personal view as a New Zealand voter and does not represent any party or other organisation.
2. This submission covers a range of issues raised in the discussion document, which are largely presented in order as in that document. The largest issue raised in this submission is the issue of decoy lists, a flaw in the mechanisms of MMP that can be exploited to produce deeply disproportionate election results.

## Background

3. I would like to take the opportunity to note the many positive features of our existing electoral system. Elections are run in a way that is both fair and can easily be seen to be fair. Voters have a wide range of options to cast their ballot before or on election day, including not being limited to a single polling booth. The fundamentally secure paper-based system and method of tracking voters on the rolls and ballots while ensuring a secret vote in almost all cases is difficult to improve upon.
4. I'm a strong supporter of proportional representation, as a key feature of any electoral system that can claim to be genuinely democratic. I was glad to have the opportunity in 2011 to vote to retain MMP, and I think this country now supports proportional representation as a key value. In both the 1992 and 2011 referendums, MMP was the only genuinely proportional option and won handily both times.

5. However, MMP was the only genuinely proportional option and New Zealand has never been offered an option of an electoral system that doesn't involve geographic electorates. Although I appreciate that switching from MMP to a different proportional system without electorates is beyond the scope of this review, I do make some suggestions that would significantly alter the role of electorates, and I think that popular support for the existence of geographic electorates shouldn't be taken for granted.
6. A future review should note that MMP is not the only option for proportional representation, and not even the only option that combines proportional representation with geographic representation.

## The voting system – general

7. The discussion document raises several questions around the voting system. I do not have a strong view on the 5%/one-seat threshold in an of itself. However, in combination, this system provides an incentive for minor parties that can realistically win an electorate to also contest the party vote. As I discuss in the section on overhangs, I don't think that this incentive should be removed, either by removing the one-seat threshold or significantly lowering the 5% threshold, unless the issue of overhangs is fixed.
8. The ratio of electorate to list seats should be fixed in order to ensure there are always enough list seats to provide proportionality. My preference is to ensure this by increasing the size of Parliament.
9. I support retaining the three-year term of Parliament. Three years is long enough for voters to judge a government's performance. If governments think that three years is not long enough to complete a certain package of reforms, then it is reasonable for them to renew their mandate at the election or seek cross-partisan support.
10. I support retaining the flexibility of the Prime Minister to choose an election date, but it should be convention to consult the leaders of other parties, and to explain why the date was chosen if it is not the traditional last Saturday in November.

## The voting system – overhangs and decoy lists

11. Although I raise numerous issues in this submission, one that cuts across topics and is the most important is the risk that the proportionality at the heart of

MMP can be undermined through loopholes, key of which is the accidental or deliberate exploitation of overhang seats.

12. The term "overhang" is not used in the Electoral Act, and different people seem to use the term inconsistently. Although it always refers to a situation where the House has more than 120 seats, some people seem to apply this term to proportionately elected list MPs, rather than the electorate MP who caused the overhang. This is the usage in the glossary in the discussion document. However, I think this is the wrong way to look at the issue. The overhang's disproportionality is caused by the electorate winner *not* being entitled to a proportional seat, not list MPs who have genuinely won enough votes to be entitled to a proportional seat.

13. Some commentators have proposed "fixing" the issue of overhang seats by capping the number of list seats to always produce a 120-seat House. However, this supposed solution makes the disproportionality of overhang seats slightly worse, rather than fixing the issue.

14. So in this submission, I will use the term "overhang" seat to refer to the *electorate* seat that caused the overhang, by being awarded to a party that did not receive enough party votes to be entitled to it.

15. Overhangs are not compatible with proportional representation. An overhang seat arises when a party is only proportionately entitled to certain number of seats, but the workings of the electoral system as it stands has given them more than that number of seats.

16. Overhangs have arisen four times in the nine elections held under MMP, at its most extreme in 2008 with two overhang seats. This is still a relatively minor departure from proportionality, and in all cases, the overhang has been an accident for which the party was not to blame. Both parties to have caused overhangs (Te Paati Māori and United Future) have campaigned strongly for the party vote as well as in their electorates, and I don't think there's a big risk of disproportionality coming from accidental overhangs.

17. However, an overhang can be deliberately engineered, and this is a significant risk.

18. A party could choose to run an electorate-only campaign, and this is inherently the case for all independents and unregistered parties. Although no independent or unregistered party has been elected under MMP, our system should be designed to work even if voter preferences change.

19. An even greater risk could come from an existing party with a support base choosing to split itself into electorate-only and party-only wings. Although the two parties are nominally independent, they work together in the election and would typically merge again after the election.

20. This phenomenon is known as a decoy list. The result if one party used this, is that it would receive a huge advantage at the election, a disproportionate boost of dozens of seats (for a major party), often enough to change the balance of power.

21. Because of this huge advantage, other major and mid-sized parties would be forced to follow suit. The end result of the technique is that the Parliament is substantially enlarged as every electorate becomes an overhang, and only the list seats are allocated proportionately. This is effectively the same outcome as occurs under Supplementary Member, an electoral system New Zealand rejected at both the 1992 and 2011 referendums. It also means a significant risk that a bloc can form government despite having received fewer votes than the opposition, an outcome that MMP is supposed to avoid. It would also increase Parliament to 192 MPs.

22. This technique is far from theoretical and has been used overseas in other mixed-member proportional systems. Explicit and deliberate successful uses of decoy lists have been made in general elections in other jurisdictions with MMP-like voting systems vulnerable to the technique, including:

    - in 2001 in Italy,
    - in 2005 in Albania,
    - in 2005 in Venezuela,
    - in 2007 in Lesotho, and
    - in 2020 in South Korea.

23. Other than the latter most recent occurrence, all those countries have since altered their voting system to either fix the overhang issue or simply accept it by explicitly switching to a Supplementary Member system. No country that has seen decoy lists has had the problem simply go away – once one party does it successfully, each other party is forced to follow suit. The proportionality of the system is then permanently lost, unless the system is reformed.

24. Unsuccessful attempts to use decoy lists have also been made in 2007 in Wales and 2021 in Scotland. These jurisdictions that might be expected to have a significant potential influence on New Zealand politics given the political,

personal and cultural linkages between parties in New Zealand and the United Kingdom.

25. No party in New Zealand has yet made a noteworthy attempt at a decoy list, and I believe the major parties would likely consider it dishonourable to attempt. However, the stability of New Zealand's political landscape should not be taken for granted, and should the environment change enough that a major party would attempt this, New Zealand would likely be in the context of other major political shifts or a crisis – a particularly poor time to also have a political/electoral crisis on top. The decoy list issue should be solved now, while it is still theoretical and non-partisan.

26. A decoy list could also arise de facto, where a party with a strong base of support in certain electorates would be a natural coalition partner for one with a significant support base nationally. While unintentional at first, the parties could be tempted to take advantage of a naturally arising situation.

27. There are numerous possible ways to fix the issue of decoy lists. One is to switch to an alternative proportional representation system other than MMP, which I note is outside the scope of this review. However, for completeness and interest, it's worth noting that other proportional systems either largely or completely avoid this issue, including those with large but proportional multi-member electorates. All of the countries to have decoy lists be used have solved the issue (or accepted it) by moving to a completely different system.

28. All methods that fix the issue would, as a by-product, also largely or completely eliminate the ability of independent candidates and unregistered parties to run for election, and so in my discussion of Part 3: Parties and Candidates I suggest some ways to make it easier for unregistered parties and independents to run for election by registering.

29. Some possible ways to fix or mitigate the issue are listed below:

| Solution | Description | Discussion |
|---|---|---|
| Status quo | No mechanism to stop overhangs. | Deliberate overhangs are discouraged by convention, but this is an unstable equilibrium that relies on an unwritten sense of fair play, rather than rules. In a more partisan, distrusting atmosphere it is not guaranteed |

| Solution | Description | Discussion |
|---|---|---|
| | | to hold. It also does not prevent accidental overhangs.<br><br>There is a slight incentive for minor parties to avoid deliberate decoy lists because of the ability of parties to "coat tail" list MPs if they win an electorate. These seats would be lost if a party attempted to use a decoy list and the decoy list party did not get 5% of the vote. |
| (1) Compensatory seats | Provide additional list seats to make up for overhang seats as required. This is used in Germany at present. | Fixes the issue, but is only practical when overhangs are only caused by a relatively small number of votes. In principle, an electorate seat could be won by a candidate who had received only e.g. a tenth of the number of party votes required. Compensating for this would require an impractical tenfold increase in the size of Parliament.<br><br>In the case of an independent or unregistered candidate they would have zero party votes and therefore there is no possible number of seats that would proportionately compensate.<br><br>This therefore can solve minor overhangs but not large-scale deliberate overhangs. |
| (2) Eliminate split voting | Voters only receive one vote, which counts as both a vote for their local electorate candidate and a national party. This was originally | This eliminates most of the possibility of large-scale abuse of overhangs through decoy lists, especially in combination with compensatory seats. |

| Solution | Description | Discussion |
|---|---|---|
| | used in MMP in Germany but has since been removed. | It doesn't completely eliminate the possibility of overhangs, if the outcome from FPP seats is significantly different to the proportional outcome, an inherent risk of FPP and one of the key motivating factors for switching to MMP in the first place.<br><br>However, removing split voting removes a feature that significant numbers of New Zealand voters already make use of, and it undermines the theory of MMP that voters are separately choosing their favoured local representative, independent of party. |
| (3)<br>Require absolute majorities in electorates | An electorate MP can only be guaranteed to be elected with an absolute majority of the vote. Otherwise, electorate seats are allocated to make sure a proportional outcome, even if this means the seat is not awarded to the plurality winner. This is comparable to the system used in 2008 and 2012 in Romania. | Eliminates overhangs caused by a significant number of parties running for electorates. However, this system relies on eliminating split voting, and it means that electorates are represented by a candidate who didn't get the single largest number of votes which may not be accepted by voters as legitimate. |
| (4)<br>Do not award electorate seats where the winner does not get sufficient party votes | A party would only be awarded enough electorate seats to make up the number of seats won through the party vote. Seats would be filled in order of the party list or the electorate vote majority. Any spare | This is the most direct solution, and makes no change to the outcome or voting process in elections where there would not have been an overhang anyway. However, it could be seen as unfair to voters in unfilled electorates, who do not get an |

| Solution | Description | Discussion |
|---|---|---|
| | electorates would be unfilled. They would remain vacant for the entire term and not be filled through a by-election. Parliament would then have an additional list seat to ensure 120 MPs. I'm not aware of any countries using this system. | MP explicitly assigned to their area, unlike voters in other areas.<br><br>This would also require changing the Electoral Act to allow for a term-long vacancy in an electorate seat, to avoid the disproportionality coming in through in a by-election. See also my discussion on the proportionality issues caused by by-elections. |
| (5) Overhang MPs do not get a vote in the House | Similar to the above option, but overhang MPs would nonetheless remain in Parliament as non-voting observers. They could participate in most of the official business of Parliament, but they would not vote in individual votes, their party would still only receive the number of votes they were entitled to in party-line votes, and so on. For example, a party that won 10 seats through the party vote but won 12 electorates would have 12 MPs but get 10 votes on legislation. I'm not aware of any countries using this system. | This is a fairly direct solution, and makes no change to the outcome or voting process in elections where there would not have been an overhang anyway. It provides a local MP for all voters to advocate for them in constituency matters, even if that MP is non-voting.<br><br>However, this raises the question of how to fill the seat in a by-election, and would significantly change business in Parliament by having two different "classes" of MP. |
| (6) Award electorate seats to the next-highest-polling party with | A party would only be awarded electorate seats (in the order of its party list, or by the size of each electorate majority, or some other method) until it had received its fair entitlement. | Possibly the fairest outcome and does not change the outcome or voting process in elections where there would not have been an overhang anyway. However, it could be seen as a very significant departure from MMP |

| Solution | Description | Discussion |
|---|---|---|
| valid seats still to fill | Subsequent electorates would be filled by the highest-polling valid runner-up. This is somewhat similar to the method used in Romania in 2008 and 2012 (see solution 3 above) for those electorates where no candidate got an outright majority[i], and is comparable to the best-runner-up system used in Baden-Württemberg, Germany, although there it is used for list seats rather than overhang seats. | as currently understood for elections where it is relevant.<br><br>The mathematics of this approach are complex and can lead to surprising, albeit still fair results if there are a significant number of overhangs to cure. It also means that, although each electorate gets an MP with a significant amount of support in that electorate, it is not necessarily the highest-polling candidate, which may not be seen as a desirable outcome by voters used to the First Past the Post outcomes for electorates under both MMP and the earlier FPP system itself. |
| (7)<br>Declare suspected decoy lists invalid | The Electoral Commission or another neutral party could reject blatant attempts at a decoy list and deem two parties to be the same party for the purpose of the election. I'm not aware of any countries using this system routinely, but the possible threat of this discouraged an attempt to use a decoy list system in the 2007 Scottish election. | This would solve the most blatant cases of decoy lists, but not subtler methods or large-scale accidents. It runs the risk of the Electoral Commission becoming politicised, and the certainty of it being seen as politicised. |

[i] For a fuller description, see Cosmin Gabriel Marian; Ronald F. King (2010). *Plus ça change: Electoral law reform and the 2008 Romanian parliamentary elections. Communist and Post-Communist Studies, 43(1), 7–18.* doi:10.1016/j.postcomstud.2010.01.004. Note that in the Romanian system there were no list seats and proportionality was achieved only through this method of allocating electorates – however, this system could easily be extended to include list seats and function like our current MMP system where there is no overhang. The Romanian system also grouped electorates into small sub-groups of approximately 5 seats and ensured rough proportionality within each group, which is an optional feature of the system.

30. Each system has both strengths and weaknesses and no one method has every desirable feature. The possible strengths that the public might see for each method are:

    - Does it work in all cases, or at least most cases?
    - Does it produce the same outcome as standard MMP would have if there were no overhang?
    - Does it still give every electorate their own local MP?
    - Is that local MP always the first-past-the-post winner?
    - Does it allow for independent candidates and unregistered parties?
    - Is it an objective outcome without needing a "moderator" to make a decision?
    - Does it limit Parliament to 120 members?
    - Does it avoid having "two classes" of electorate MP?

31. These are summed up for each method in the table below:

| Method | Works in all or most cases? | Same outcome as status quo method when no overhang? | Every electorate gets an MP? | Local MP is always FPP winner despite party? | Allows independents and unregistered parties? | Objective outcome w/o moderator? | Limits Parliament to 120 MPs? | Perceived as single class of electorate MPs? |
|---|---|---|---|---|---|---|---|---|
| MMP<br>Status quo | No | N/A | Yes | Yes | Yes | Yes | No[a] | Yes |
| (1)<br>Compensatory seats | No | Yes | Yes | Yes | Yes[b] | Yes | No | Yes |
| (2)<br>Eliminate split voting | No | No | Yes | No | No | Yes | No[a] | Yes |
| (3)<br>Require absolute majorities in electorates | No | No | Yes | No | No | Yes | Yes[c] | Yes |

| | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| (4) Do not award electorate seats where the winner does not get sufficient party votes | Yes | Yes | No | No | No | Yes | Yes | Yes |
| (5) Overhang MPs do not get a vote in the House | Yes | Yes | Yes[d] | Yes[d] | Yes[e] | Yes | No[f] | No |
| (6) Award electorate seats to the next-highest-polling party with valid seats still to fill | Yes | Yes | Yes | No | No | Yes | Yes | No[g] |
| (7) Declare suspected decoy lists invalid | No | No | Yes | Yes | Yes[h] | No | No | Yes |

Notes:

a. Doesn't automatically limit MPs to 120 but this can be done separately.
b. Optional, but solution doesn't work if independents or unregistered parties win seats.
c. In all but extreme cases that cannot easily be engineered.
d. Yes, but overhang MPs are non-voting.
e. Yes, but non-voting.
f. No, but excess MPs are non-voting.
g. Although there would be no formal difference, MPs who did not win the plurality of the vote might be perceived as being somehow less legitimate.
h. Runs the risk that genuine independents and unregistered parties could be mistakenly declared attempts at a decoy party.

32. My preference, if electorates must remain, is for option 6: to award electorates to the next-highest polling valid candidate. This leaves the current system unchanged for elections where there are no overhangs. It removes the possibility of independent or unregistered party MPs, but no unregistered party has ever achieved a significant number of votes under MMP, and no independent has won or got particularly close to winning since the Second World War. It would mostly lead to reasonably understandable outcomes.

33. If this method had been applied in past elections, only in the 2014 election would it have made the difference between a party being in Parliament or not. In that case, it would have eliminated a party that received 1/121st of the seats

in Parliament despite only gaining 1/455th of the vote – less than a third of the number of votes required to entitle it to a seat.

34. In the 2011 and 2014 elections it would have awarded the overhang electorates (one in each case) to runners-up who trailed the winner by less than 1000 votes.

35. In 2005 and 2008 it would have caused significant changes to electorate winners, but would have cured an over-representation that was largely caused by split votes, and in each case would have tipped the electorate seat to the party that still polled the highest (by far) in the party vote in that electorate. It also would not have changed the outcome of which parties were able to form a government.

36. That said, it is all the more important to cure a disproportional overhang if it were a situation where it would affect who formed the government – as otherwise it would likely mean a government that did not get the support of a majority of voters for parties that made it into Parliament. Public displeasure at such an outcome in 1978 and 1981 was part of the original driving force behind the electoral reform that ultimately produced MMP.

37. However, despite my preference for this method, I believe that curing the risk of decoy lists is by far the most significant issue to fix in the electoral system, and I would welcome any of the other methods, or another method I haven't discussed, if the panel thought that a better option.

38. Regardless of the option used, disproportionality can still be caused by by-elections, and this is a decision independent of the method used for overhangs.

## The voting system – disproportionality from by-elections

39. Disproportionality can also arise at by-elections. This cannot be deliberately engineered at large scale, so is less of a fundamental risk than decoy lists, but it still allows the overall balance in Parliament to be shifted even without reason to think the overall balance of party support nationally has shifted.

40. In cases where the balance of parties in Parliament is close, it also causes difficulties for individual MPs who may no longer want to or be capable of doing the job, but feel forced to stay in order to not risk a disproportionate party swing that risks the government they have confidence in.

41. There are several potential ways to limit or remove the ability of by-elections to cause disproportionality. In these examples, I will call the party that held the seat before the vacancy Party A, and a potential other party winning the by-election Party B.

| Method | Discussion |
|---|---|
| Do not hold by-elections, and fill the vacancy with a member of Party A off the party list. This could be either the next list candidate, or the list candidate based closest to the electorate, or some other method of picking a suitably local MP. | Solves the disproportionality but does not allow local selection of the replacement MP. |
| Do not hold by-elections, and leave the seat vacant. Allow Party A to continue to exercise a proxy vote for the vacant seat. | Solves the disproportionality but does not allow local selection of the replacement MP. |
| Limit candidates in the by-election to only members of Party A. Multiple candidates for the party could stand. Parties could be required to allow any party member to stand, or to have a democratic internal process for selecting nominees, and not to retaliate against candidates who stood against the central party organisation's preferred candidate. This solves the issue, but does not necessarily provide as genuine a contest as one with multiple parties providing candidates. | Solves the disproportionality but limits the options available to voters. It is also likely to be difficult to force Party A to provide suitable candidates to make a genuinely competitive election when it's likely to want a single favoured candidate to win. |
| Limit candidates in the by-election to members of Party A, and current MPs for other parties. If a list MP for another party won the electorate, they would become an electorate MP instead, and Party A would get a replacement list MP. If an electorate MP for another party won the seat, their other electorate would become vacant and another by-election held. | Provides a genuine local contest but gives one party a greater choice of candidates than the others. |
| Allow an open election, but if party control of the electorate changed, re-balance Parliament afterwards. The winning Party B would lose its lowest-placed list MP, and Party A would gain a list MP. | Provides a completely open local contest but raises the possibility that an MP might lose their seat who had no connection with the original vacancy and did not choose to contest the election. |

42. While the risk of disproportionality from by-elections is significantly less, it is still a conceptual flaw in MMP that should be corrected. Any of these options would do so.

43. In the past, MPs who have broken with their parties have sometimes resigned in order to contest the resulting by-election to "gain a mandate" for a new party. Most of these methods would eliminate that possibility, which inevitably changes the balance of power between party and MP. However, I think the consequences of this should be considered in light of the unfairness that list MPs do not have an equivalent mechanism, and so removing this possibility for electorate MPs helps reduce the sense that there are "two classes" of MP.

## Voters

44. A fundamental principle of democracy is that each person's vote counts equally. This has a number of requirements – that votes are not weighted, that electorates are equally sized, and that voters can vote only once.

45. New Zealand adequately handles most of these issues in national elections, although it retains plural voting in some circumstances in local elections. While outside the scope of this review, I think local government elections should be reformed to remove this and provide that each person can vote only once.

46. The same issue of plural voting applies internationally. People who are entitled to vote in more than one country have a greater say than those who can vote in only one, which is not consistent with the one person one vote principle.

47. Comprehensively fixing this issue would require that every country in the world is democratic and joins in an international convention to set consistent rules for which country every person can vote in. This is of course outside the ability of any unilateral action by the New Zealand state and unlikely to happen any time soon.

48. However, we can design our eligibility rules to reduce the practice of international plural voting in some limited situations where voters live overseas and are almost certainly entitled to vote somewhere else.

49. Accordingly, I think the eligibility rules should be changed so that permanent residents (who are in most cases citizens of another country, and likely to be eligible to vote there) are only eligible to vote if they have spent over half of the previous 3 years in New Zealand. An exception should be made for stateless persons and refugees, as they are unlikely to be able to vote elsewhere.

50. Dual citizens should likewise be excluded if they have, in the previous three years, spent more time in their other country of citizenship than in New Zealand.

51. These rules would prevent plural voting while still only applying to situations where a person does not live in New Zealand and would be likely to be eligible to vote in their other country of citizenship, both under the rules that most countries currently apply, and if other rules adopted the same rules as I propose for New Zealand.

## Voting in elections

52. Our current system of voting encourages most people to vote in person, but provides huge flexibility about where and when. There are also options for people who are unable to vote in person. I think this approach provides the maximum flexibility to voters while still providing integrity and no fundamental change is needed. The system for preventing multiple voting is elegant and effective.

53. Counting votes by hand in the presence of scrutineers also removes technological threats to election integrity. The paper system cannot be hacked, and unlike an electronic system it is possible for a layperson to observe and be confident in the integrity of the process.

54. Accordingly, I oppose major change, including widening the availability of postal voting and electronic voting, as these are inherently less secure than in-person voting.

55. However, one option that would promote public trust in the process is for a continuous count of special votes to be released and for any options to be taken so that the return of special votes is sped up. At present, a significant percentage of votes are not counted until well after election day, and a speedy official result helps build trust in the election process. The experience of the United States in recent elections has seen conspiracy theories arise because of a count "on the night" later changing after the return of the equivalent of special votes.

## Parties and candidates

56. I broadly support the current qualifications for parties and candidates. However, as discussed in the section on overhangs and decoy lists, most

solutions to the overhang issue would remove the ability of people to run as independent candidates or for unregistered parties.

57. I think this is reasonable in light of the advantages of retaining proportionality, and even in the event that independents and unregistered parties were to win, they would inherently be non-proportional.

58. Independents and unregistered parties have also historically never been popular. No independent has won a seat in any general election since World War II, nor come close. By far the best performance was in Ilam in 2017, with the independent coming a very distant second. Even in this situation the candidate was pitching themselves as a protest vote in a clearly safe seat for the incumbent.

59. Other than that no independent or unregistered candidate has won a significant number of votes. Even that independent in Ilam and the independent winners of by-elections have all gone on to become part of registered parties, and so it is arguable that they were independents only out of convenience because of the difficulty in forming, registering, or joining a party.

60. In the modern political system, even if a single independent or unregistered candidate were to win a seat, they would still have limited influence in a party-driven Parliament, which relies on being able to form coalitions.

61. However, taking away this possibility still does remove something that a number of voters and candidates do still take advantage of. To make up for it, I suggest making it easier for independents and unregistered parties to become registered.

62. One straightforward way to make this easier, is to reduce the number of members a party needs to have to become registered, from 500 down to 100 or 200.

63. However, ultimately, candidates who cannot organise or join a party and function within it are ultimately unlikely to ever convince enough voters to elect them, or even if they do, to effectively get anything done in Parliament in collaboration with other MPs, and so I think the costs to voters of losing independent candidates are low. This is the same logic used to justify the 5% threshold excluding MPs – that they are simply likely to be ineffective.

## Conclusion

64. I thank the Independent Electoral Review for the opportunity to submit on the workings of our democracy. If the panel have questions around my

submission, I'm happy to speak to it. I am available to meet in Wellington, by video, or answer questions by phone or email. See my covering email for contact information.