

Eco Choice Aotearoa values the opportunity to provide feedback on the Commerce Commission's draft Collaboration and Sustainability Guidelines.

The ecolabel's comments are as follows:

1. Eco Choice Aotearoa believes radical collaboration is necessary to limit the effects of climate change and further environmental degradation. As such, it would like to see the Commerce Commission state explicitly at the *beginning* (rather than #16) of the document that the guidelines do not serve to discourage such partnerships but exist to ensure they are fair and transparent in nature.
2. The guidelines could be strengthened by providing more guidance around how businesses could ensure potential collaborations are open and transparent. For instance, making the terms of the collaboration publicly available and ensuring there is an opportunity for other businesses to participate too.
3. The Commerce Commission should consider whether the sustainability outcomes could be reasonably achieved *without* collaboration.
4. The Guidelines should place emphasis on the importance of stakeholder engagement with environmental groups, other businesses, consumers etc., when developing collaborations with sustainability objectives.
5. The guideline should consider where competition, stifles progress and is detrimental for the wider community, such as multiple standards and certifications set up to compete, instead of being able to cooperate for a robust, single standard. This in turn benefits the wider community with consistent and easy to understand best practices.
6. Eco Choice is particularly concerned by draft guideline #26.2. An agreement by a group of purchasers not to purchase from a specific supplier that has unsustainable practices should absolutely be encouraged. This is a key lever in influencing industry to do better and raise the bar. Further, what is deemed 'unsustainable' should be ascertained with evidence-based research and, or existing environmental & social standards.

Should you wish to discuss any of the above points in more detail, please don't hesitate to get in touch.

Ngā mihi

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Eco Choice Aotearoa