

DRAFT FOR CONSULTATION - 31 JULY 2023

Collaboration and Sustainability Guidelines



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Purpose

- 1 The purpose of this guidance is to assist businesses to understand when collaboration with competitors for sustainability objectives may raise competition issues and, if so, what steps they can take to comply with the law.
- 2 This guidance is aimed at collaboration between businesses who would usually be expected to compete.

Introduction

- 3 The purpose of the Commerce Act 1986 (Commerce Act) is to promote competition in markets for the long-term benefit of consumers in New Zealand.¹ Competition is the process of rivalry between firms that leads them to offer better products, lower prices and drives them to innovate. The Commission's competition functions include educating consumers and businesses, and investigating and enforcing provisions of the Commerce Act that are designed to protect competition. These include provisions that prohibit anti-competitive agreements, mergers, and misuse of market power. The Commission also carries out market studies.
- 4 The Commission has a range of specific guidance relating to conduct that may substantially lessen competition, or may breach competition laws in other ways.² This guidance is provided in addition to the Commission's general competition guidance due to the scale of queries it is receiving from industry relating to competitor collaboration on sustainability initiatives.

Role of the Guidelines

- 5 This document provides general guidance about what to consider when collaborating with competitors to achieve sustainability outcomes. It is intended to assist businesses considering how potential collaboration for sustainability purposes may and may not impact competition, how competition law applies (including the application of exceptions and the clearance and authorisations processes) and factors to consider when designing your collaboration.
- 6 Not all types of competitor collaboration will affect competition. This guidance also explains when collaboration for sustainability purposes is unlikely to affect competition.
- 7 In addition to collaboration between competitors, other types of business arrangements may also affect competition. For example, mergers, conduct by a single firm with substantial market power, and vertical arrangements between firms at different levels in the supply chain. This guidance does not cover these types of conduct.³
- 8 These guidelines are not law and are not intended to be legally binding or to replace legal advice. They are not an exhaustive guide to the interaction between collaboration for the purpose of achieving sustainability objectives and the Commerce Act.
- 9 Businesses can email the Commission at competition@comcom.govt.nz to discuss proposals. Alternatively, businesses may wish to seek legal advice if they are concerned that their proposal may breach the Commerce Act.

1 Commerce Act 1986 s1A.

2 Commerce Commission: *Mergers and Acquisitions Guidelines* (May 2022); *Authorisation Guidelines* (June 2023); *Misuse of Market Power Guidelines* (March 2023); *Competitor Collaboration Guidelines* (January 2018); *Business Collaboration in Response to an Emergency* (March 2023).

3 In some circumstances, such conduct may be authorised on public interest grounds, despite substantially lessening competition. Our authorisation process is briefly described at the end of this guidance.

Competition and Sustainability

- 10 Competition is a key driver of value, innovation, and productivity in markets, and generally creates better outcomes for New Zealanders. Competition can incentivise businesses to innovate to meet consumer preferences for sustainable products and services.⁴
- 11 Sustainability refers to the practice of future-focused development to ensure future generations have access to the resources needed to meet their needs. Sustainability balances economic, social, and environmental considerations. While the concept is mostly associated with environmental protection, it may, for example, include issues of inequality, food security, responsible consumption, and labour rights.⁵
- 12 Given the scale and urgency of the issue, this guidance focuses on environmental sustainability, which includes initiatives to reduce greenhouse gas emissions and adapt to the effects of climate change.⁶ However, this guidance can also be applied to the wider definition of sustainability.
- 13 In our [Statement of Intent 2023-2027](#), the Commission notes the impact of climate change on key sectors of the economy and the need for a whole-of-system approach that delivers an appropriate level of resilience over the long-term. We are paying attention to how climate change affects how markets are working, and impacts on the lives of New Zealanders.
- 14 Many businesses are considering how to implement sustainability initiatives, such as decarbonisation. This may require changing industry production techniques to reduce emissions or reducing the environmental impact of production, packaging, distribution, and disposal. In doing so, businesses may want to collaborate with businesses they compete with. For instance, competitors might want to work together to reduce their carbon footprint or to improve the environmental standards of their products. This type of collaboration may be helpful to achieve sustainability goals (e.g., to reduce or share costs, to avoid first mover disadvantage, or achieve the scale needed to address industry-wide environmental issues). However, in some circumstances it may raise competition issues.
- 15 Businesses may also want to compete on environmental outcomes as a point of difference with their competitors. For competition to work well, consumers must have access to the information they need to make well-informed choices about which goods and services to buy. Many consumers rely on the representations of manufacturers about the sustainability characteristics of their products. All businesses must make sure their sustainability claims are substantiated, truthful, and not misleading to avoid breaching the Fair Trading Act 1986. For more information, see our [Environmental Claims Guidelines](#) to help retailers and manufacturers understand their obligations when making environmental claims.⁷
- 16 The Commission does not want to unnecessarily deter businesses from lawfully collaborating to promote sustainability out of fear of breaching competition law. This is because industry collaboration is likely to be necessary to meet New Zealand's international commitment to reducing greenhouse gas emissions by 2050.⁸
- 17 Competition law is not the primary policy tool for promoting sustainability in New Zealand, however, it can contribute to sustainability by preventing conduct that unnecessarily undermines competitive innovation.
- 18 The Commission will not tolerate sustainability being used as an excuse for anti-competitive behaviour.

4 For example, the development of electric vehicles began slowly and in response to consumer preferences for more sustainable vehicles, the market has now grown. Competition between manufacturers has resulted in innovation through research and development, the expansion of charging infrastructure and rapidly increasing electric vehicle sales. [https://one.oecd.org/document/DAF/COMP/WD\(2020\)62/en/pdf](https://one.oecd.org/document/DAF/COMP/WD(2020)62/en/pdf).

5 Sustainability and Competition (2020) – Note by Australia and New Zealand [https://one.oecd.org/document/DAF/COMP/WD\(2020\)62/en/pdf](https://one.oecd.org/document/DAF/COMP/WD(2020)62/en/pdf).

6 For more information see: <https://environment.govt.nz/what-government-is-doing/areas-of-work/climate-change/about-new-zealands-climate-change-programme/>.

7 Commerce Commission *Environmental Claims Guidelines: A Guide for Traders* (July 2020).

8 Climate Change Response (Zero Carbon) Amendment Act 2019.

Collaboration and the Commerce Act – a snapshot

- 19 Collaboration between competitors can negatively affect the competitive process. It may raise potential issues under the Commerce Act if the collaboration involves cartel conduct (section 30), or substantially lessens competition (section 27).⁹
- 20 A cartel is where two or more businesses agree not to compete with each other. Cartel conduct may take many forms, including agreements to fix prices, share markets, rig bids, or restrict output. Cartel conduct is illegal, punishable by fines, and up to seven years in prison.
- 21 Other agreements between businesses that have the purpose, effect or likely effect of substantially lessening competition, can also breach the law.
- 22 In certain circumstances, conduct that might otherwise be prohibited under the Commerce Act will be permitted when:
 - 22.1 Exceptions to the cartel prohibition for collaborative activities are satisfied.¹⁰
 - 22.2 Authorisation or clearance is granted.¹¹
- 23 The following sections provide further explanation to assist businesses to consider how competitor collaboration may interact with the Commerce Act.
- 24 Further guidance on avoiding anti-competitive behaviour is available on our [website](#).¹²

Collaborative sustainability initiatives unlikely to affect competition

- 25 Collaboration between businesses is unlikely to breach the Commerce Act if the collaboration does not affect competition between businesses. For instance, if the collaboration does not impact on the dimensions of price, quantity, quality, service, choice, or innovation that drive businesses in the relevant sector to compete. Some examples of collaboration that are unlikely to raise competition concerns are provided below:
 - 25.1 A joint campaign to raise awareness about sustainability issues within the industry or among customers.
 - 25.2 An agreement to engage in training activities for people working in the industry to improve sustainability outcomes.
 - 25.3 An agreement about policies relating to the internal conduct of businesses that does not affect capacity or output. For example, an agreement to use better environmental practices for handling hazardous chemicals on business premises.
 - 25.4 A transparently developed industry-wide common framework for reporting climate-related information.

9 Conduct by a single business with a substantial degree of market power may also have competition implications. For further information on how competition law applies to businesses with substantial market power, see our *Misuse of Market Power Guidelines*, March 2023. Parties should also consider whether the collaboration may fall under section 47 of the Commerce Act if the legal structure used to give effect to a collaboration could be caught by the merger regime. See our *Mergers and Acquisitions Guidelines* (May 2022).

10 Commerce Commission *Competitor Collaboration Guidelines* (2018).

11 Commerce Commission *Authorisation Guidelines* (2020).

12 Commerce Commission website: *Avoiding Anti-Competitive Behaviour* <https://comcom.govt.nz/business/avoiding-anti-competitive-behaviour>.

Collaborative sustainability initiatives that may impact competition

- 26 It is not possible to identify and categorise all types of conduct that may be at risk of breaching the Commerce Act. However, examples of competition considerations that may arise through different types of collaboration include:

26.1 Industry commitments to sustainability related standards. Sustainability standards agreements might specify requirements for manufacturers, retailers or service providers to meet in relation to their products or services. However, if the standards are mandatory, not timebound or stricter than necessary to achieve the sustainability objective, they may impact on the ability of businesses to offer goods or services that are different from, or improve on, the agreed standard. This can remove the incentive to compete on this aspect of their products or services and reduce the incentive to innovate. Open consultation around the standard setting process or agreement can assist in mitigating competition issues.

Example

Car emissions technology

The European Commission imposed fines of €875 million on car manufacturers for colluding on technical development in the area of nitrogen oxide cleaning. The Commission found that car manufacturers avoided competing on using the technology's full potential to reduce harmful emissions by agreeing to meet the standard required by law, and no more, despite more advanced technology being available.

The parties avoided competition on green innovation that would have improved outcomes for consumers.

- 26.2 Supply chain restrictions** (including not dealing with businesses that have unsustainable practices). An agreement by a group of purchasers not to purchase from a specific supplier might harm competition for the provision of the final product if, for example, that supplier's product or service was provided at a lower cost and constrained the price that other sustainable suppliers charged.
- 26.3 An agreement to share infrastructure with a view to reducing environmental footprint.** An agreement to share infrastructure might have significant environmental benefits. Generally, sharing infrastructure may also achieve efficiencies and cost reductions. However, in certain circumstances, such as where infrastructure is an important dimension of competition between the parties, it might also remove the incentive of parties to achieve efficiencies and reduce costs in respect of their own infrastructure.
- 26.4 Product stewardship.** This describes the situation where manufacturers, importers, distributors, and retailers of a product, share responsibility for reducing the environmental impact of their products. This can have significant environmental benefits, for example, the disposal of batteries or chemicals. This can impact competition when the parties seek to coordinate on the recovery of costs associated with the scheme. We have published a Fact Sheet on [Product Stewardship Schemes](#).¹³
- 27 Whether conduct is at risk of breaching the Commerce Act will depend on the particular facts relating to each collaboration and involve an assessment of factors described in the following sections.

13 Commerce Commission *Product Stewardship Schemes* (2019).

Cartel conduct

- 28 As described above, a cartel is where two or more businesses agree not to compete with each other. Cartel conduct can result in higher prices and a reduction of choice and quality for consumers.
- 29 Cartel conduct can take many forms including:
 - 29.1 **Price fixing** – where two or more businesses agree prices to avoid having to compete with each other. Price fixing is not limited to agreements between competitors setting a specific price for goods or services – it also includes competitors agreeing to fix any part of a price, or to set price according to an agreed formula.
 - 29.2 **Bid rigging** – an agreement among some or all of the bidders about who should win a bid. Such an agreement prevents open and effective competition and means procurers are unlikely to achieve best value for money for their business, customers, and in some cases, taxpayers.
 - 29.3 **Market sharing** – when businesses collude to carve up markets and not compete for the same customers. This could be in relation to the sale of a specific product, a geographic area, or a particular type of customer.
 - 29.4 **Restricting output** – when two or more competing buyers or sellers agree to prevent, restrict, or limit the goods or services they are buying or selling, or the goods or services that would likely be bought and sold, in competition with one another.

Example

In 2022, we issued warnings to a company and one of its directors following an investigation into an attempted customer allocation agreement in a fast-growing sustainable packaging industry.

It is the Commission's view that the conduct was likely to be an attempt to enter into a cartel agreement to allocate existing customers between the company and the competitor.

Businesses may have legitimate reasons to communicate with each other, including for sustainability objectives, but these are not opportunities to try to reach unlawful cartel agreements with competitors, which can harm the potential for industries to innovate and develop products and services at the lowest cost and highest quality.

- 30 Cartel conduct can be cleared or authorised in certain circumstances. Further information about how cartel conduct can be cleared is provided in paragraphs [35] and [36] below.
- 31 Further information on the authorisation of cartel conduct is provided in paragraphs [46] to [52].
- 32 For further detail about cartel conduct see our [Cartel Conduct Factsheet](#).

Exceptions and Clearances

- 33 The Commerce Act contains an exception to the cartel prohibition for 'collaborative activities'. This applies to situations where, as part of the collaboration, the parties might agree a cartel provision.
- 34 To satisfy the exception for collaborative activities the parties must show (among other things) that:
 - 34.1 a cartel provision is reasonably necessary for the purpose of the collaboration; and
 - 34.2 the dominant purpose of any collaboration is not to lessen competition between them.¹⁴
- 35 Parties are able to self-assess the application of this exception. However, if they are unsure about whether it applies, they can apply to us for a 'clearance' to engage in the conduct.
- 36 It is important to note that where a party self-assesses, section 31 is not an exception to the general section 27 prohibition on agreements that substantially lessen competition. Similarly, for a clearance to be granted, we must be satisfied that the conduct would not substantially lessen competition in the relevant market(s).
- 37 For further detail about the collaborative activity exception, see the Commission's [Competitor Collaboration Guidelines](#).¹⁵ These guidelines also set out the clearance application process for cartel conduct.

Example

A collaborative activity includes arrangements between competitors to jointly dispose of harmful wastes, such as paint, batteries, and refrigerant gas, including agreeing to impose levies on consumers. A key consideration will be whether agreeing to charge levies is reasonably necessary to achieve the disposal of the harmful waste.

14 In contrast to other parts of the Commerce Act, the words 'lessening competition' are not qualified by 'substantially'. All that is required is a dominant purpose of lessening competition between the parties.

15 Commerce Commission *Competitor Collaboration Guidelines* (2018).

Agreements that substantially lessen competition

- 38 Agreements that substantially lessen competition can have many effects. The businesses that are party to the collaboration might be able to charge higher prices, lower the quality of their goods, reduce services, reduce choice, or reduce innovation without fear of losing their customers.
- 39 Our approach to assessing whether collaboration has the purpose, effect, or likely effect of substantially lessening competition in a market under section 27 is set out in more detail in our [Agreements that substantially lessen competition Fact Sheet](#).
- 40 When assessing the effect or likely effect of conduct on competition, the Commission will usually undertake a ‘with or without test’. This compares the likely state of competition ‘with’ the relevant conduct to the likely state of competition ‘without’ the conduct, to isolate the effect of the conduct on competition.
- 41 Whether or not the collaboration is at risk of substantially lessening competition will always depend on the individual circumstances of the collaboration. We consider how the collaboration affects competition between the businesses that are party to the collaboration in the context of all the other factors that influence competition in the relevant market.

Factors to consider when assessing the effect, or likely effect, of substantially lessening competition in a market

- 42 Examples of some of the factors that may be relevant to deciding whether the collaboration is likely to substantially lessen competition include:
 - 42.1 **The nature and extent of the impact on competition, including the effect on price, output, quality, and innovation.** The collaboration is less likely to harm competition when it does not affect the competitive offerings, in terms of price or quality, of the participating firms and it does not threaten independent initiatives or innovation by competitors in the market.

Example

Soft drink multi pack handles

The Netherlands Authority for Consumers and Markets (ACM) agreed with some soft-drink suppliers and supermarket chains that arrangements regarding the discontinuation of plastic handles on all soft-drink and water multipacks would help to realise sustainability goals and not have any negative effects on consumers.

Soft-drink multipacks consist of, for example, six bottles of soda, wrapped in plastic with a plastic handle on top. By removing the handles on these multipacks, they become more recyclable and less plastic is needed. With this joint agreement, over 70% of multipacks will no longer have handles.

In reaching its decision, the ACM took into account evidence from suppliers that the handles do not play a role in the competitive process. The ACM also noted it was important that the arrangements would not prevent suppliers from making their own commercial decisions, including how and when to discontinue the handles.¹⁶

16 Authority for Consumers and Markets, ACM is favorable to joint agreement between soft-drink suppliers about discontinuation of plastic handles, 26 July 2022, <https://www.acm.nl/en/publications/acm-favorable-joint-agreement-between-soft-drink-suppliers-about-discontinuation-plastic-handles>

- 42.2 The extent to which the collaborating businesses have collective market power in the relevant market.** Competition is likely to be affected if the collaboration allows the participating firms to exercise market power over suppliers, customers or competitors. The greater the market power, the more likely it is to harm competition.
- 42.3 The proportion of the market affected by the conduct.** Collaboration is less likely to be harmful when it only covers a small portion of the market. For example, two competitors might agree to collaborate to use more sustainable packaging for one of their products. If they hold a small share of the market for that product, it is unlikely to affect the prices and choices available to consumers, as they can choose products from other businesses.
- 42.4 Barriers for businesses entering or expanding into markets.** Competition is likely to be affected if the collaboration makes entry or expansion into a market difficult for potential entrants.
- 42.5 The duration of the conduct.** The longer the duration of the conduct, the more likely harm to competition may occur.
- 42.6 The ability for parties to act independently.** For example, in the case of an agreement to develop new standards for a particular product, competition is less likely to be harmed if the parties remain free to sell products not subject to the standard and if they are free to take steps which go beyond the minimum set by a standard.
- 42.7 The ability for non-parties to participate.** For example, in the case of an agreement to introduce a new sustainability labelling system, competition is less likely to be harmed if other businesses are able to take advantage of the system on non-discriminatory terms.
- 42.8 The exchange of competitively sensitive information.** The agreement is more likely to harm competition if competitively sensitive information is shared that is not necessary for the collaboration.

Standard setting

- In some circumstances, sustainability standards might restrict competition. This can occur through price or quality coordination, foreclosure of alternative standards, or the exclusion of other competitors.
- Measures that could mitigate this risk include ensuring that:
 - The parties to the sustainability standard do not agree to increase prices to recover any increased costs arising from implementation of the standard.
 - The procedure for developing the sustainability standard is transparent and all interested competitors, including potential competitors, can participate in the process leading to the selection of the standard.
 - The sustainability standard is not mandatory.
 - Participating businesses remain free to adopt for themselves a higher sustainability standard than the one agreed.
 - The parties to the sustainability standard do not exchange commercially sensitive information that is not necessary for setting the standard.
 - There is effective and non-discriminatory access to the standard.

Pro-competitive efficiencies

- 43 The assessment of whether a collaboration substantially lessens competition in a market involves a consideration of the pro-competitive effect of the conduct.
- 44 This assessment might take into account sustainability factors. For example, to contribute to sustainable development, competitors may wish to agree to replace non-sustainable products or processes with sustainable ones. Competitors might enter into a standardisation agreement to achieve this. As part of this, the competitors might introduce a label or logo to demonstrate that they meet the requirements of the standard. By using a logo or label, which provides information about the sustainability characteristics of their products, consumers can be more confident that products or services meet their sustainability preferences. This might, thereby, increase sales of the relevant product.
- 45 In assessing whether the conduct has, or is likely to have, the effect of substantially lessening competition, we will consider any in-market pro-competitive effects of the conduct. In practice, the Commission finds it helpful for parties to identify pro-competitive effects to the Commission as early as possible in the investigation process. Any out of market pro-competitive effects can only be considered under the authorisation process.

Authorisations

- 46 Where collaboration does impact competition, and businesses might be at risk under the Commerce Act, the parties to the collaboration can apply to the Commission for an authorisation of their collaboration. Authorisation is available for collaborations that may involve cartel conduct or may otherwise lessen competition.¹⁷
- 47 We can authorise a collaboration if there are public benefits that arise which outweigh the detriment that results from the loss of competition. Sustainability is a benefit that could be taken into account in this regard.¹⁸
- 48 We, and other regulators, have considered sustainability considerations in several authorisation decisions to date. In these cases, the sustainability issues considered were environmental benefits that were claimed as arising from the various proposals. Some of these examples are set out below.
- 49 The effect of an authorisation, once granted, is that the conduct will not be prohibited and cannot be challenged by the Commission or third parties.
- 50 The Commission is also able to authorise conduct, on an interim basis, so that the parties can give effect to the proposed agreement while we continue to consider the application for authorisation.
- 51 Our [Authorisation Guidelines](#) explain how we assess applications to authorise agreements in the public interest.¹⁹
- 52 In addition to authorising agreements, we can also authorise other conduct that would otherwise breach the Commerce Act. For example, unilateral conduct that would be likely to have the effect of substantially lessening competition in a market. If there is sufficient public benefit to outweigh the competitive harm arising from the conduct, we can authorise it.

17 Authorisation is also available for mergers and unilateral conduct. For further details see our Collaboration Guidelines.

18 For further details of how this approach works see: Sustainability and Competition – Note by Australia and New Zealand, 1 December 2020, at [https://one.oecd.org/document/DAF/COMP/WD\(2020\)62/en/pdf](https://one.oecd.org/document/DAF/COMP/WD(2020)62/en/pdf).

19 Commerce Commission *Authorisation Guidelines* (2023).

Refrigerant License Trust Board

In 2011, we considered environmental benefits in the Refrigerant License Trust Board authorisation decision. The refrigerant wholesalers sought to agree to supply refrigerants only to customers that are trained and certified to safely handle refrigerants. The primary benefit that we took into account was increased compliance with safety regulations and a reduction in the release of potentially hazardous substances into the atmosphere. Flowing from this, our view was that the likely net benefit for the public outweighed any detriment (due to the exclusionary provision), and that the arrangement should be authorised.

Nelson City Council and Tasman District Council

In 2012, Nelson City Council and Tasman District Council adopted a Joint Waste Management and Minimisation Plan. As part of this plan, the Councils agreed to jointly make the most effective and efficient use of their waste management services in the wider Nelson-Tasman region. In 2016, the Councils sought authorisation from the Commission to form a business unit to jointly operate the two landfills in the Nelson-Tasman region.

We authorised the arrangement. As part of our assessment, we considered the reduced greenhouse gas emissions that would result from lower waste volumes.

Soft Plastics Taskforce (ACCC)

In November 2022, Australia's Competition and Consumer Commission (ACCC) approved an interim authorisation to allow major supermarket retailers to form part of a recycling "Soft Plastics Taskforce". The supermarkets lodged an urgent request to cooperate following the suspension of the country's only return-to-store plastics programme.

The decision allowed the retailers to cooperate for a limited period to develop and implement a short-term solution for storing, transporting, processing, recycling, and managing soft plastics. The ACCC noted the approval responded to the urgent need to address the environmental risk of the existing stockpile and future waste and recognised the public benefit of the initiative for all consumers.²⁰

On 30 June 2023, the ACCC granted authorisation, with conditions to ensure there is continued transparency and that the public are kept up to date, for a period of 12 months. The ACCC considers that the conduct is likely to result in significant public benefit which would outweigh any likely public detriment.²¹

²⁰ <https://www.accc.gov.au/media-release/supermarkets-can-cooperate-in-soft-plastics-taskforce-after-redcycle-pauses-recycling-program>

²¹ <https://www.accc.gov.au/public-registers/authorisations-and-notifications-registers/authorisations-register/coles-group-on-behalf-of-itself-and-participating-supermarkets-2>

What businesses considering collaboration can do

Sustainability is an important policy goal and we do not want concerns about competition law to unnecessarily deter initiatives. Businesses considering collaboration for sustainability purposes can follow the process below:

1. Read this guidance carefully to understand the potential impacts of the collaboration on competition.
2. Consider whether the collaboration is at risk of breaching the Commerce Act:
 - Will the collaboration be between actual or potential competitors?
 - Will the collaboration affect the competitive process?
 - Will the collaboration restrict the ability for businesses, or other entities, with an interest in the functioning of the market in that sector to input?
 - Will any information be shared between competitors that is not strictly necessary for the collaboration?
 - Will the collaboration take place for an unlimited time?
 - Will the collaboration amount to cartel conduct?
 - Will the collaboration be likely to substantially lessen competition?
3. If the answer is yes to any of the questions above, or you are not sure, consider getting legal advice.
4. Consider the benefits of collaboration and whether authorisation or collaborative activity clearance might be appropriate.

Contact us at competition@comcom.govt.nz if you are unsure how to apply this guidance or wish to discuss your proposal further. While we are unable to provide legal advice, we can discuss the various options.



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This is a guideline only and reflects the Commission's view. It is not intended to be definitive and should not be used in place of legal advice. You are responsible for staying up to date with legislative changes.

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