

Preliminary Paper No. 2

**THE ACCIDENT COMPENSATION SCHEME**

A discussion paper

The Law Commission will welcome your comments upon the various issues outlined in this paper.

Some of the financial questions raised in the course of the inquiry at present in progress by the Law Commission appear to require early consideration. It would be appreciated if responses to those questions could be forwarded on or before 8 October 1987 to:

The Director, Law Commission, P.O. Box 2590, Wellington

Comments on other questions may be sent to the same address on or before 11 December 1987.

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## TERMS OF REFERENCE

The Law Commission is asked to examine and review that part of the Accident Compensation Act 1982 which recognises and is intended to promote the general principles of community responsibility, comprehensive entitlement, complete rehabilitation, real compensation and in particular administrative efficiency as propounded by the 1967 Royal Commission Report on Personal Injury in New Zealand.

It may be accepted that those principles are broadly acceptable and deserve to be supported.

The basis upon which the Accident Compensation Corporation or its predecessor has made provision from time to time for the annual amounts needed by the accident compensation scheme for benefits, administration and contingency or other reserves together with the principles and methods applied in their allocation or distribution will form part of the overall inquiry.



## INTRODUCTION

1. It will be seen from the foregoing terms of reference that the Minister of Justice has asked the Law Commission to examine and review aspects of the accident compensation legislation and its administration in practice. Expressly included within the review are the principles and methods used to fix the amounts required as income from year to year and also the nature and scope of benefits and their assessment.

2. During the week ended 4 April 1987 the terms of reference were advertised with an invitation to those who might be interested to make submissions in writing by 30 June. As many as 1200 individual replies have been received. We express thanks to all who have taken trouble to offer assistance in this way. We appreciate as well the opportunity we have had of meeting representatives of some of the groups directly affected by matters within the inquiry.

3. Now we seek further help. In this paper we have attempted to outline some of the matters which have been brought before us and some comment which seems to bear upon them. *Several affecting finance appear to require immediate attention and will become the subject of a preliminary report.*

4. There are a good many other issues which have considerable long term significance. For example -

- . Should there be any changes in the scope or the nature or the level of benefits?
- . Or entitlement to them?
- . Has the private sector any part to play in the system?
- . Are there areas where close administration could effect savings?
- . Or minimise abuse?
- . Is sufficient attention given to safety?
- . And rehabilitation?

For reasons of time a good many of these broad questions, obviously important in themselves, will be dealt with in a second report. To the extent necessary we will at the same stage reconsider any aspect of the preliminary report which is affected by this further group of conclusions.

## IMMEDIATE PROBLEMS

5. The reasons for handling our responsibility in this way can be explained quite shortly.

6. In December 1986 an Order-in-Council was promulgated which increased by about three times the levies to be paid by employers in respect of the financial year 1987/88. The amounts were payable before 2 June 1987. A similar increase was made in the levies to be paid by self-employed persons. Decisions to this effect had been taken against an urgent need to deal with a growing deficit in the income account and a consequential rapid erosion of reserves.

7. In an immediate sense the problem had arisen from earlier pressure by some employer groups for a reduction in the levies then averaging \$1.07 per \$100 of payroll. As a result they were reduced for the year ended 31 March 1985 by no less than 30% to an average of 74 cents. Later this figure was adjusted to 71 cents then to 77 cents. By the end of the three-year period ending 31 March 1987 there had been an effective reduction in reserves of about \$324.6 million.

8. If the levies had remained at the average of \$1.07 then, had an increase been required at all for the 1987/1988 year, it might have been kept to about 50 cents or less. But the situation which had developed could not be undone; and the size of the increased levies announced in December 1986 with the need to make payment within five months resulted in criticism. The matter provides part of the reason for the present reference.

9. There are suggestions that the scheme has been affected by unexpected and considerable increases of costs in real terms. The increasing figures seem to be influenced, as might be expected, by the fact that the system has been maturing since 1 April 1974. We will attempt to examine all aspects of cost. This part of our exercise will begin with our first report to the Government and be finalised at the second stage.

10. In the meantime there is the matter of assessing levies for the coming 1988/1989 year. Normally such assessments are undertaken and a decision announced no later than December in each year. In this situation we must move quickly in relation to these money issues if the inquiry is to be of any assistance by December 1987.

11. Any further comment you have upon any of the matters referred to in this discussion paper will be most helpful. However, because of the pressure of time we would be grateful if we can have your views upon the more immediate issues relating to the matter of levies by Friday 8 October 1987. We would appreciate your comments on other issues by Friday 11 December 1987.



## GENERAL CONSIDERATIONS

12. Although many people put forward suggestions for the scheme's improvement or considered that levies should be handled in some different way, an overwhelming number of the submissions we received (no fewer than 750) expressly supported its underlying concepts. They indicated that its general form should be retained. That may seem a surprising response from those who at the same time were critical of particular aspects of the system. A recent nationwide poll yielded a similar result. Out of a sample of 2,500, 80% supported the Accident Compensation scheme, though many also responded positively to questions which suggested a redistribution of some of its costs.

13. However not everybody will recall what preceded the present scheme. And there is probably a need to have some understanding of the background because the abandonment of older methods and the duties and rights associated with them involved a degree of compromise. The broad and in the end bipartisan consensus which was reached by the time legislation was enacted depended on what many groups and individuals consciously regarded as a kind of compact producing for most people benefits in return for concessions.

14. For example, everybody lost the right to claim damages on grounds of negligence; and employees no longer had automatic rights against individual employers under the workers' compensation legislation. In return there was 24 hour support against the risk of injury for the whole family. At the same time motorists were freed from damages claims as were employers both in respect of work accidents involving negligence and also the problems to be faced when faulty products reached the consumer.

15. This general basis for what has been called a social contract will not have the same significance for every group in the community. It is likely, however, that most of those who were and still are affected by the outcome will feel that it cannot be lightly brushed aside. So what is thought to-day about the matter?

16. To enable a balanced assessment to be made of the various proposals raised in the present review (some of which would take parts of the system back to personal cover with private enterprise insurers on the principle of "user pays") it seems useful to consider very briefly the position in New Zealand prior to 1974.

## THE BACKGROUND

17. The formal reference speaks of the five general principles propounded in the 1967 Report of the Royal Commission on Personal

Injury in New Zealand.\* The Law Commission is informed that those principles are broadly acceptable and deserve to be supported. They have been summarized as –

- . community responsibility
- . comprehensive entitlement
- . complete rehabilitation
- . real compensation
- . administrative efficiency

18. Time has passed since those principles were accepted and used as the appropriate basis for a new all-embracing remedy in answer to the problems of those injured by accident and the fact is relevant in two respects.

19. The first is that people are forgetful while at the same time there is an arriving generation of New Zealanders who have never known any system other than the statutory accident compensation scheme. It is not easy to make valid judgments about the worth of any social institution without remembering how it came to be there. The other is simply that if the five principles continue to be acceptable it is not because they have received support for twenty years but because it is generally thought they can be used today as a sensible and contemporary test of contemporary attitudes and aspirations.

20. Before the Accident Compensation Act 1972 took effect on 1 April 1974 injured people could seek help from three different systems in the public sphere. If somebody else had been at fault damages could be claimed in terms of the negligence action. The workers' compensation legislation provided limited flat rate assistance in the case of work connected accidents. Those able to meet a means test were eligible for a benefit under the social security system.

21. The potential liability of both motorists and employers involved compulsory insurance schemes. In the one case it was to cover the risk of a negligent driver injuring a third party. In the other the purpose was to ensure that an injured worker would receive the automatic compensation under the legislation or common law damages if the worker were able to prove negligence against the employer.

22. These sources of financial recompense or assistance produced very uneven results for injured persons. The drivers of vehicles were not protected by the third party insurance scheme unless it could be proved that another driver had been negligent. Employers themselves were not protected should they suffer a work injury. Many other accident victims were left unaided by any of the systems. And yet it was all very expensive.

23. Apart from any legal and other charges faced by claimants, the compulsory insurance schemes absorbed for administration, legal

\* Referred to in the discussion paper as "the 1967 Report"

expenses and profit over 30% of the premium income in the case of workers' compensation and a good deal more than 40% in the case of motor vehicle third party insurance. In other words it cost \$30 in the one case to put \$70 into the hands of the injured worker and in the other the cost to provide the claimant with \$55 was about \$45.

24. The comprehensive provisions of the accident compensation scheme attempted to meet the disadvantages of the earlier systems. In the practical area of administration and expense the comparison with private insurance seems important by itself. For the 1986/87 year the Accident Compensation Corporation had expenditure of \$578.2 million of which administration costs were \$41.6 million or 7.2%. If the remaining \$537 million had been disbursed on a cost/benefit ratio of 30:70 overall expenditure would have been increased by no less than \$189 million. If the ratio got to 45:55 there would have been a rise of \$398 million above the actual expenditure or an extra 69% above the 1986/87 figures.

25. At the same time the compensation was to be aimed at providing a realistic measure of compensation related to earnings and so assisting to maintain living standards. By this means it was possible to avoid the unfairness of flat-rate benefits and/or the disincentives to save and work associated with the means test.

26. The flat-rate benefit is mentioned in the 1967 Report on the basis that - "it is disheartening for an energetic and skilled tradesman to find that the compensation he must accept [under the Workers Compensation Act] in respect of his lost wages is the same as that provided for the most recent recruit to the industry earning half his income and facing half his losses".

27. It may be worth repeating from the same Report a comment upon the means test:

260. Criticism [of] the means test ... falls under five heads. First, this is a device usually applied to promote economy in the distribution of limited funds at a level of basic subsistence. It could not properly be operated in the assessment of compensation merely to give subsidies, from adequate funds, to a segment of injured persons whose qualification for the subsidy bore no relation to the level of their losses. Second, fair recompense should not be denied to one man because he has been provident; nor over-compensation provided for another with minor injuries but massive debts. Third, income from savings would be taken into account, and we think that a system 'which penalises savings is not only iniquitable but against [the country's] economic interests' (Brian Abel-Smith, *The Reform of Social Security*, p.13). Fourth, the inquiry into means which would become necessary to establish entitlement seems to us an unnecessary intervention and quite irrelevant to any attempt to compensate a man for injury. Fifth, an income-related means

test would be a serious disincentive to rehabilitation and a return to work. In the present context the principle must be compensation for losses, not assistance for need which already is the subject of generous attention in New Zealand."

28. In the 1967 Report there is an explanation of the concept underlying the principle of community responsibility –

"Once it is accepted that it is in the national interest to provide for deserving groups of workers some form of comprehensive insurance which in the long run the public is to support, then any discrimination between people in the same general situation could hardly be justified. In the case of the Workers' Compensation Act it is true that in an immediate sense compensation is provided by compulsory levies upon all employers in the form of insurance premiums. Nevertheless, as the New Zealand Law Society has recognised in its general submissions, it is not difficult to demonstrate that in the end it is the community as a whole which pays. Clearly the premiums are built into the costs of industry and automatically become part of the price to be paid for the product. Since the insurance scheme is a compulsory one the premiums can be regarded as a sort of indirect tax borne finally by us all."

29. Those arguments were accepted by the Government and provided the basis for collecting from employers for the new scheme equivalent amounts in what are called levies and which clearly are taxes assessed against pay-roll.

#### SOME SUGGESTIONS FOR CHANGE

30. In submissions which answered our newspaper advertisement concerning this inquiry there are various proposals for amendment of aspects of the accident compensation scheme. It is convenient to list several of them. We hope that any organisation or person interested in these or other matters touched on in this paper will not hesitate to communicate with us.

31. There are suggestions which would alter the scope of the scheme or the benefits it provides. It is said that –

- . benefits should be subject to automatic increases in order to keep pace with inflation
- . the wage base for 80% earnings related compensation should be no lower than average weekly earnings
- . there should be a more reliable definition of "accident"

- . non-earners should be provided with periodic benefits assessed against a notional income
  - . better provision should be made for occupational diseases
  - . there should be no provision for lump sum payments
  - . lost earning *capacity* should be the basis for compensation
  - . congenital disabilities should be included
32. Other suggestions would enlarge the source of funds:
- . by some form of levy to be provided by citizens generally
  - . or by drivers of motor vehicles
  - . or by sports bodies
  - . or by those embarking upon relatively risky recreational activities
  - . or by part-payment of fees charged by general practitioners and physiotherapists
33. Among questions about the administration of the system is whether there should be -
- . reversion wholly or in part to private enterprise insurance

This can be seen as raising a basic question about the character of the scheme.

34. Our findings and recommendations on these and other relevant issues will take account of their effect upon the scheme as a coherent concept and by reference to the principles mentioned in para.17. We will also keep in mind submissions that nothing should be done which could provide a barrier against eventual extension of the important income maintenance concept to include sickness related disabilities.

### INCOME AND EXPENDITURE

35. For the year ended 31 March 1987 the total expenditure of the Accident Compensation Corporation was \$578.2 million, an increase of \$123.8 million over the previous year. Income in the same year increased by \$80.9 million but in all only to \$423.4 million. So there remained a deficit of \$154.8 million, handled by transfer from accumulated funds (reserves). As we have already explained the

increasing shortfall is the background reason for the large increases in employer and self-employed levies announced in December 1986.

36. It is expected that expenditure for the 1987/88 year will increase to \$798 million. Of this amount 48% is likely to be absorbed by earnings related compensation, 21% by lump sum payments, 14% by medical and hospital treatment (including an amount equivalent to 4% of total expenditure for physiotherapy) and 7% for administration. The remaining 10% will be spent on smaller benefit items, accident prevention and rehabilitation.

37. In 1987/88 the Corporation's total income is estimated to reach the vicinity of \$963 million. If these estimates turn out to be correct there will be about \$165 million which will improve badly diminished reserves. Assessments of the Corporation are that \$674 million (70%) will come in levies from employers and the self-employed; \$126 million (13%) from the motor vehicle levy; \$117 million (12%) from the Consolidated Account; and \$47 million (5%) from investment income.

38. These figures need to be considered in a wider context. Consider for example that it is estimated \$3857 million will be spent on national superannuation in 1987/88 and on unemployment benefits about \$632 million (Estimates of the Expenditure of the Government of New Zealand for the year ending 31 March 1988: Parliamentary Paper B.7(Pt.I)). Comparisons from the private sector must come from earlier years. In 1984/85 accident insurance companies received a premium income of \$402 million (mostly for property damage) and \$290 million was paid in premiums for fire insurance. In 1984/85 employers in three of the industry groups which pay levies to the accident compensation scheme contributed \$82 million to employees' pension, superannuation and welfare schemes. That amount is two and a half times greater than the whole of the levies paid by the same three groups as their contribution towards the \$300 million which was the total income of the Accident Compensation Corporation in that year.

#### SOURCE OF FUNDS

39. At this point something further should be said about the reason why the accident compensation scheme has been largely financed by levies on employers, the self-employed and the owners of motor vehicles. The 1967 Report recognised that a comprehensive system in the field of social security involves community responsibilities which should be accepted by the State and supported by contributions from citizens generally. Although as a matter of immediate impression it accordingly seemed that the scheme should be financed directly from the Consolidated Fund the report stated that a different recommendation would be made. This was done for two reasons which were explained in the following way:

462. First, the comprehensive scheme is intended to embrace two compulsory insurance schemes already operating. To the extent that the necessary insurance premiums can be built into the costs of industry or transport this has long since been done. If these premiums were wholly rebated in favour of a general system of taxation there would be a continuing advantage to industry at the expense of the general taxpayer. A logical argument is an insufficient reason for shifting these costs in such a fashion.

463. Second, to the extent that the amount of these premiums has been passed on by industry their cost is already being shared by the whole community, even though indirectly. Accordingly the broad principle of community responsibility is in this way being satisfied already.

40. The Royal Commission therefore recommended that subject to appropriate adjustments the amounts then flowing into the compulsory workers' compensation and third-party insurance schemes should be made available for the purposes of the proposed comprehensive scheme. Self-employed persons, also, should contribute an amount equal to 1% of net relevant income. The balance of the scheme should be financed directly from general taxation. These recommendations were subsequently implemented by legislation.

41. During the gestation period leading to the enactment of legislation the National Government decided to exclude non-earners from the scheme except in the case of motor-vehicle injuries. And the 1972 Act then spoke of two individual accident schemes supported individually on the basis mentioned. By 1973 a new Government produced a change for those who had been left outside the scheme. They were brought into the system which thus became comprehensive. But to avoid delay in preparing a new Bill which would have enabled the now unnecessary distinctions between the circumstances of different accidents to be removed a third or supplementary scheme was set up. Its needs were met from general taxation. It may be of interest to note in this connection that the payment into that third fund by the government during the first year of operation (the year ending 31 March 1975) was \$2.9 million. Seven years earlier it had been estimated in the Report of the Royal Commission that the new scheme would relieve the Social Security fund (using 1967 figures) of the need to pay invalidity and other benefits of about \$2 million. By 1975 the one figure may well have been balanced by the other.

42. Thus, by an historical accident, the system began and continues to operate on a basis which has often prompted misconceptions that inevitably each of the three schemes has to be self-supporting and independent in an insurance sense. There would seem to be no economic or practical reason for continuing to maintain individual sets of accounts for a system which draws no distinction between beneficiaries once entitlement to compensation is established.

As a direct policy decision, for example, injuries caused by work-related motor-vehicle accidents were taken away as a charge upon the earners' scheme in 1983 and made a responsibility of those who paid levies to the motor-vehicle fund. As expected there was a significant run-down in reserves in the motor-vehicle fund. This has been a factor in the recent large increase in motor vehicle levies.

43. Some accident costs are not borne by the Accident Compensation Corporation. The most significant are public hospital costs which are met through the Health Department system.

### RESERVES

44. It needs to be appreciated that although from its inception the Accident Compensation system began to receive an income similar to the total amount which had been paid to the insurance industry it nonetheless had no backlog responsibilities for earlier accidents. The liabilities it incurred began only with injuries arising from accidents which happened after midnight on 31 March 1974. Thus it was intended to and did achieve a considerable surplus in the first 6 to 8 years with gradually diminishing surpluses thereafter as it moved towards what may be described as a plateau. This is likely to be reached after about 18 years.

45. It was not suggested by the 1967 Report that the collection from the outset of annual income at the level indicated should initiate a "funded" system of financing the scheme in the sense that compensation for an injury received in a particular year would be paid for out of the income received in that year no matter how long the commitment might continue into the future. Instead, it was thought that the expected surpluses would provide a painless way of building up adequate reserves for contingencies. By this means undue fluctuations in cash flow from year to year could be avoided and there would be some provision against unexpected demands on the fund in the event of a sudden disaster such as an earthquake.

46. The 1967 report provided an explanation of the matter -

479. ... Actual income will ... exceed actual payments until the fund has been in operation for a number of years. A decision must be made as to whether a system of funding should be operated or the unused income set aside and invested on the basis that the scheme should be self-supporting from year to year. We recommend that the second of these alternatives be investigated with a view to adoption ... As the scheme will be a Government scheme of social insurance it must in the final resort receive the backing of the State. It is for this reason



that a formal system of funding cannot be regarded as essential to the stability of the whole scheme.

47. That last recommendation does not appear to have been sufficiently analysed when the scheme began operating and producing the inevitable substantial surpluses during the initial years. In any event by the year ended 31 March 1984 the surplus incomes of the preceding years had provided a reserve totalling \$396m. In the same year expenditure totalled \$284.5 million. However, it was about then the maturing scheme began to absorb much larger portions of the levy income; and it was at this very time unfortunately that employers were pressing for a reduction in the levies paid by them (as mentioned in para.7). In December 1983 decisions were taken that levies for both employers and self-employed persons should be reduced by approximately 30%. The employer levy at the time averaged \$1.07 and was reduced to 74 cents for the year ended 31 March 1985. Similar action was taken in respect of levies paid by self-employed persons. Associated with these reductions was a deliberate decision to run down the amount held as reserves. In the result by 31 March 1987 there had been a dramatic reduction in this amount to a figure of \$89.2 million.

## BENEFITS

48. The system aims at the maintenance of living standards by providing earnings-related benefits as the central feature. There is a waiting period of one week. In the case of work related accidents this week is the responsibility of the employer. After the first week the rate of payment during a period of total disability is 80% of lost earnings. At present there is a maximum payment of \$976 per week.

49. The waiting period seems to offer advantages. It may enhance individual responsibility. The employer is given an incentive to prevent accidents. At the same time many employers have sick leave arrangements for their employees which frequently extend to a period of at least a fortnight in each year. For the employee there is a continuity of income although overtime is excluded. The accident compensation system itself is relieved not simply of the compensation which otherwise would be paid out of the fund as earnings related compensation for that first week but also of the considerable administrative burden in handling very many small claims.

50. Against these considerations it is suggested that the waiting period could properly be extended to two weeks. Some submissions would go even further, particularly in relation to non-work accidents. The suggestions rest on arguments that the scheme should focus on more serious or longer term problems than incapacity affecting individuals for relatively short periods. There are other submissions (based on similar reasons) which propose exclusion of permanent but

minor incapacities which have little practical significance for the individual concerned. The Law Commission would be glad to receive any comment upon these proposals from those who have not yet made submissions concerning them.

51. A different issue concerns workers whose wages are below average weekly earnings. It is said that when the factor of 80% is applied to assess earnings related compensation for such a group, particularly should the incapacity last for any length of time, there is inevitable hardship. We are asked to consider whether it would not be right to fix a minimum wage base in the case of an adult worker at a figure no lower than average weekly earnings.

52. Those who suffer permanent physical impairment and others affected by some significant degree of pain and suffering as the result of an injury are entitled to a lump sum payment. There are suggestions that these capital payments should be abandoned either because they are contrary to the income maintenance purpose of the Act or because of increasing cost or both. The relevant maxima are \$17,000 and \$10,000 - figures which are not automatically kept in line with inflation or the increasing cost of living. There have been suggestions that the ceiling upon each of these figures has resulted in a tendency for awards to be made in less serious cases which are too high: that they are moving up in a disproportionate way towards justified awards in cases where the injury has had a much more serious impact.

53. For whatever reason, it is said that the cost of lump sum benefits has been escalating at both an unexpected and unacceptable rate. Tables 3 and 4 in Appendix A set out the annual payments since the scheme's inception. Clearly the annual totals have increased in a marked way. It seems however that until 1978 a backlog of cases awaiting assessment had been building up. A different factor is a 1983 increase to the two figures \$17,000 and \$10,000 from \$7,500 and \$5,000. The question as to how rapidly these costs have been mounting for other reasons is not certain. The average payment for claims registered in each of the last 3 years and paid in that year is: in 1985, \$3,038, in 1986 \$3,503, in 1987, \$4,006.

54. A permanent impairment which is accompanied by lost enjoyment of life and so qualifies for a lump sum payment is one of the components which is provided automatically within the single "schedule type" assessment of the degree of lost physical capacity considered by reference to the average experience of mankind. The economic component is provided, of course, at the same time and on the same basis. This last item then becomes an estimate of the percentage of lost *earning capacity* which a permanent disability of that kind usually produces. The percentage figure is then applied to the maximum periodic benefit to which the individual would be entitled when totally incapacitated. On this approach it is possible to avoid the delays and administrative burden of having to make not only a tailor-made

assessment of the appropriate lump sum payment but of *actual* lost earnings as well.

55. We would be assisted in our consideration of these matters by your opinion –

- . as to whether lump sum payments should be retained
- . as to whether there should be a schedule type assessment of lost earning capacity if lump sum payments were to disappear, and if so
- . whether the encompassing periodic payment which would result should be associated with a discretionary power in the Corporation to commute all or part to a capital sum in deserving cases

## REHABILITATION

56. A main objective of the scheme is the rehabilitation of those who suffer injury by accident. The Corporation is required to take all practicable steps to promote a well co-ordinated and vigorous programme for the restoration of the incapacitated as speedily as possible to the fullest physical, mental and social fitness of which they are capable. In carrying out this duty emphasis has been placed on the visible and desirable achievements of providing house alterations and other aids, and assistance with training to cope with disability or to undertake different work.

57. But is there not a need for the Corporation's rehabilitation officers to do more in helping accident victims who are oppressed by uncertainty over future job prospects, the recovery process, or difficulties with compensation? Should they not take the initiative in monitoring the progress of the more seriously incapacitated? And is it sufficiently appreciated that rehabilitation officers must be seen to be working entirely for the welfare and recovery of accident victims? Is it desirable that they should not at the same time be involved themselves in assessing compensation on the Corporation's behalf?

58. Different aspects of the rehabilitation objectives are affected by the methods of assessing certain kinds of benefit including as an example the matter mentioned in para.54. Is this a factor which should have any influence in decisions as to the value of lump sum benefits?

59. These are a few of the questions that have been raised in this important area.

## THE DEFINITION OF "ACCIDENT"

60. The Accident Compensation scheme covers only disabilities that are the result of "accident". So long as it is necessary to distinguish between accident and illness the method of doing so is of crucial importance. It determines, on the large scale, the total scope and cost of the scheme. On the individual level, it is the basis of every person's entitlement to assistance. If the line at the boundary is uncertain there is likely to be delay, argument and sometimes disappointment.

61. Under the old Workers' Compensation system, compensation was restricted to "injury by accident arising out of or in the course of the employment". To an extent these final qualifying words helped to point towards the occurrence or otherwise of an "accident". The present Act did not need to distinguish between work and non-work accidents. Consequently the qualifying words in the former definition were left out. The Act provides that some specific conditions are to be regarded as "personal injury by accident". Others are not. But the definition does not attempt to be exhaustive or to give any general guidance.

62. Several submissions have suggested that the definition of "personal injury by accident" is not sufficiently clear. Evidence of this is the frequency of litigation about its application in particular cases. This is likely to be a feature of any more detailed but still generalised formula.

63. It may be possible to eliminate a good deal of uncertainty if the kind of "accident" which is to qualify the word injury could be specified in detail. Already such a tabulation exists in the "E Code," in the *Manual of the International Statistical Classification of Disease, Injuries and Causes of Death* (WHO 1977). This code describes not the "condition" or effect of an accident (such as a broken leg), but the "cause" (such as a fall). It is extremely detailed and it is in a form which permits deletions or additions. Only in the doubtful areas would a doctor or other professional need to have resort to it. When it did become necessary either the clearest answer 'yes' would be there, or it would not.

64. As a vehicle to clarify by addition or subtraction consider, for example, occupational disease. Incapacity caused by diseases arising out of employment is included in the present definition, and there is no suggestion that this be changed. There are, however, problems in establishing the connection between an occupation and a disease. Unions in particular are concerned that doctors and patients are often unaware of possible links between industrial conditions and the occurrence of disease, and consider that this may lead to a failure to diagnose disease or to attribute it to occupational causes.

65. This is partly a matter of knowledge and attitude. These could possibly be improved by a schedule approach. Once it had been

accepted that a particular industrial activity or agent was a cause of disease, it could be so listed in the schedule, thereby alerting doctors to the possibility of an occupational link with the condition. (The specific cause would be additional to the broad heading of occupational disease.)

66. It may also be appropriate, as in the case of deafness, to include a statutory presumption that certain illnesses or disabilities are a result of the victim's occupation. A different issue is whether an occupational disease little understood in earlier days but having a very long latency period, (asbestosis is a prime example) should qualify for assistance despite the fact that its origin may have been employment prior to 1 April 1974.

67. Then there is the matter of medical misadventures. Under the present Act, disabilities caused by accidents in medical, surgical and dental procedures are expressly included within the definition of "personal injury by accident". The interpretation of "medical misadventure" has produced problems over the years. Some feel that it has been too restrictive. For example, the Corporation generally rejects claims where the disabilities result from "known risks" of the medical procedure. Is this interpretation justified when, in other areas, the existence of "known risks" has no effect on coverage? The sports injuries area is just one example of this.

68. Others oppose any widening of "misadventure" on the grounds of cost. We note in passing that the inclusion of medical misadventure in the scheme has avoided some of the insurance problems affecting medical practitioners that are common in other countries.

69. Then there are congenital problems. When a child is born suffering from a disability, it is often difficult to determine whether the disability was caused by accident or disease. A question therefore arises as to whether congenital disorders in the very young deserve special treatment. If it was thought appropriate to do so, all disabilities arising in the pre-natal period, whether a result of accident, disease or genetics, could be covered by the scheme, so long as they become manifest within, say, 3 years of birth. This could be done by inclusion in a schedule.

70. Finally, pain and mental suffering which result from accident are covered by the scheme. However, it appears from the submissions that in some cases there are problems in obtaining compensation. Examples mentioned include sufferers of chronic pain and victims of sexual assault and violent crime who are left with psychological and emotional injury. A schedule approach could assist these people also. The cause of the disability ( such as rape ) would be listed in the schedule, automatically entitling the victim to recognition as an accident victim.

71. Other problems raised in this area are not so much problems

of interpretation but of policy and administration. In the area of sexual assault, for example, it is often suggested that the insistence on assessment by a professional of the Corporation's choice, the restriction of payment to "professional" counsellors only, and more generally a failure to appreciate the full effects of sexual assault on a person's life hinder effective rehabilitation. It has also been pointed out that victims of sexual assault are often unaware of their right to compensation. Should the Corporation try to ensure that people are made aware of the benefits available in such cases?

### MEDICAL TREATMENT

72. The benefits under the accident compensation scheme include the cost of medical treatment. For those accident victims who are not admitted to the public hospitals or treated in their casualty departments, the general medical practitioner is usually the "gateway" to medical treatment and, through the provision of a medical certificate in appropriate cases, to earnings related compensation during any period of temporary total disability. While greater certainty as to the circumstances in which injury can be said to be due to an accident would help to keep the scheme within its proper bounds, there are other measures too which might be taken to cut down any abuses.

73. One suggestion, which the Corporation may be able to implement administratively, is to require those seeking medical treatment for an injury suffered as the result of an accident to sign a simple claim form setting out the relevant details. Most people are not prepared knowingly to sign their names to false statements.

74. At present a claim form is required only from those who eventually apply for compensation. Otherwise the bulk billing system, devised to cut down administrative costs, enables a medical practitioner, or a person providing radiological or physiotherapy or other paramedical services, to send in an account for fees certifying only that on a particular date a named patient was treated for personal injury by accident. Though the costs attributable to abuse of medical benefits under the scheme may not be great in proportion to its total cost, any abuse is damaging to its credibility. From this viewpoint the additional expense of processing individual claim forms may well be worthwhile.

75. The Corporation would also be better placed to do more about checking on claims that seem questionable, with the help, if necessary, of the professional associations. It would be an important if incidental advantage if the form enabled better statistics to be kept about the causes of accidents as well as the costs of their treatment.

76. There are other abuses claimed to exist in this area. Employers in particular complain that doctors certify people as "not fit for work" for longer periods than are necessary. It has also been suggested that doctors make too many referrals to physiotherapists, and that too many physiotherapy consultations are taking place. These allegations are difficult to prove or to disprove. There is clearly a need for the highest sense of professional responsibility among those providing health care, as well as a renewed sense of individual responsibility among those with only minor injuries. Sometimes, however, it will be necessary to measure the costs of treatment or of time away from work against the costs avoided through speedier or fuller recovery.

77. One proposal aimed at cutting down the costs of providing medical treatment under the scheme has recently received a good deal of publicity. It has been suggested that accident victims should be required to pay the first \$200 incurred in treating accident injuries in any one year, or as a result of any one accident. The Law Commission would like to know what people think about this proposal.

78. Under the Accident Compensation Act, the Corporation is required to pay the cost of medical treatment, so far as it considers that the amount is reasonable by New Zealand standards. This provision calls for a determination by the Corporation of what is reasonable in the particular case. Difficulties have arisen because, in an effort to hold down costs, the Corporation has not for some time set new "annotation lines". These set the level of fees that will be paid without the justification of special circumstances. As a result levels have now fallen below those generally charged.

79. The providers of health care who present accounts to the Corporation have the certainty of receiving payment. When they are able to bill the Corporation in bulk they also avoid the cost of billing individual patients. Should these advantages be taken into account in determining what fees are reasonable by New Zealand standards? And without improperly eliminating competition, should there be a regular procedure for discussions between the Corporation and the professional associations concerned so that all parties have a full understanding of the considerations that may be relevant?

#### APPORTIONMENT OF THE TOTAL COSTS

80. It has been mentioned that the compensation scheme is simply an aspect of the social welfare system in New Zealand. And also that the earners' scheme and the motor vehicle accidents' scheme were established not for strict actuarial or statistical reasons but as a means of receiving and allocating the global amounts of tax to be raised from each source in the form of levies. However, this step, (and in the case of the earners' scheme the retention of the old

occupational risk classifications) has created an impression that the levies on employers ought to be regarded as insurance premiums based on meeting the cost of injuries suffered by the employees of a particular enterprise.

81. With the recent increase in the total amount of levies many employers have criticised the funding of non-work accidents to earners through the earners' scheme. There are other suggestions that the levies could be reduced by abandoning some kind of benefit.

82. This issue comes into focus when it is realised that the creation of a separate earners' fund has only been a device which for broad policy reasons enables a proportion of the overall cost of the scheme to be met by a levy on payrolls. In the case of the self-employed the assessment is against their real or notional income. The question now is whether this kind of apportionment should remain or be changed. In reality there is no reason for it. The scheme is not dependent upon identifying the number or nature or location of the accidents which are to be paid for from the employers' levies. The pragmatic reasons which led to a transfer of all work related road accidents from the earners' fund to the motor vehicle fund in 1983 illustrates the absence of any principled connection between that source of funds and the work related accident costs it was asked to meet.

83. This is the broad background against which it is necessary to evaluate suggestions that the earners' scheme should fund work accidents and only work accidents. If this were to happen, it becomes necessary to ask: should the costs of work-related road accidents be returned to the earners' fund? Or the costs of the treatment of work accidents in public hospitals (at present outside the accident compensation scheme) become a charge on the same fund? The real questions may be whether there is some broad equity in leaving the total cost of each scheme approximately where it now is; and if so is it possible for sensible savings to be made; and finally is it possible for a degree of redistribution of cost within each group.

84. We will examine all these suggestions although in the end they may not produce a large effect on the overall amount required to support the earners fund.

## RECREATIONAL INJURIES

85. A frequently made suggestion has been to collect additional revenue for the scheme by direct or indirect levies on those who take part in sporting activities and thereby accept the risk of injury. It was said, for example, that there should be a levy on sports organisations, or on individuals taking part in organised sport, or that a tax should be imposed on takings at the gate or on sports equipment.



86. These suggestions probably should be evaluated, bearing in mind the costs of sports injuries in relation to injuries as a whole. They accounted for only 6.2% of total expenditure in 1986/87.

87. It is necessary as well to consider what may be the administrative difficulties and expense which would arise in levying members of the sporting community; or their clubs; or spectators at sporting fixtures. A further question would be where and how to draw the line between the sporting activity which should be levied and other more casual recreational activities that should not, without leaving a serious risk of argument and dissension at the boundary.

88. We would be glad of comment upon these matters.

### DRIVERS OF VEHICLES

89. The 1967 Royal Commission Report proposed that, in addition to the levies paid by the owners of motor vehicles, there should be an annual levy on the holders of drivers' licences as a contribution to meeting the costs of injuries arising from road accidents. The new arrangements under which a driver's licence will be issued for life clearly rule this out.

90. There are submissions that there should be a modest levy on fuel. It is said this would have the advantage of relating payment to use, and so be justified in terms both of equity and efficiency. We would be glad to have comment upon this matter.

### THE EARNERS FUND LEVY

91. Under the heading "Immediate Problems" (see para.5) there is reference to the considerable increases in levies to be paid by employers and by self employed persons for the 1987/1988 year. After a reduction in the variable rate of levy paid by employers to an average of 74 cents for the year ended 31 March 1985 from the average figure of \$1.07 (which had been quite close to the average since the scheme had begun to operate in 1974) there were two minor adjustments. Then levies were increased for the 1987/88 year by a factor of about 3 (an increase of 200%). The reduction in the case of self-employed persons had been to 80 cents but for the following year that figure was increased by 25% to \$1. For the 1987/88 year it became \$3.75, a further increase of 275%. When both sets of levies are calculated together the overall average becomes \$2.47.

92. Under the compulsory workers' compensation insurance

scheme the premiums paid by employers had necessarily been assessed on the basis of the degree of risk supposed to be associated with the particular industry. It was necessary from the point of view of the insurance industry because a greater premium would be needed by an individual insurance company which accepted liability in the case of a high-risk industry than its opposite number which was concerned, for example, with clerical workers.

93. When the new system began to operate this same principle of classifying risk was retained although the reason for it had disappeared. Qualification for a benefit no longer depended upon the origins of an injury. As for the Corporation, the costs it had to anticipate did not have to be related to the statistical incidence of injury by causes. Instead entitlement was extended throughout the country to everybody who suffered injury by accident. As mentioned earlier the compensation scheme is not an insurance system at all but a means of providing one particular form of social welfare payments. And one of the sources of revenue to support it is the employer levy, in essence a payroll tax. Insofar as the earners' fund is used to meet the costs of work-related accidents, this source of income has been kept as a variable levy dependent upon the nature of the industry.

94. In contrast the levy on employers for non-work accidents has always been at a flat rate. And self-employed persons have always paid the same equal amount. As mentioned in para.91 it has recently been increased by 275% to \$3.75. This, of course, is a good deal more than the average levy now charged against employers both in amount and as a proportionate increase. An important question is whether the difference can be justified. Since all self-employed persons are levied at the same rate it might have been thought that the amount they are to pay could properly be equated with the average assessed for employers (as it was until 1985).

95. It should be explained that at present there are four components of both self-employed and employee levies three of which are unrelated in a direct way to the *current* cost of work accidents. If the average overall figure of \$2.47 cents is taken as the figure which will produce the intended income for the earners fund it is made up of the following items -

	\$
to supplement reserves	.48
to meet a payment to the Industrial Safety, Health and Welfare Programme of the Labour Department	.08
for non-work injuries suffered by earners	.81
for work accident injuries	<u>1.10</u>
	\$2.47

There is a question as to whether the second of those items should be collected by the Corporation as part of its own levy requirement but effectively on behalf of the Labour Department. The Law Commission will examine the various components and the overall requirements of the Accident Compensation Corporation.

96. There are three questions concerning the provision of levies by employers and the self-employed which are of immediate relevance. The first is mentioned in para.91. Should the levy to be paid by self-employed persons be reduced to the combined average of their levies and levies paid by employers, at present \$2.47? A second issue, is whether it would not be equitable for all these levies to be paid by instalments rather than by a single payment almost as the financial year begins.

97. The levy setting programme produces some anomalies. Levies are paid in one sum at the end of May for an annual period which does not finish until the following 31 March. One problem arises because the basis for calculating the levy is the payroll for the preceding year, which ended two months earlier. A second is that employers have only five months' notice of the amount they are to pay because rates cannot be announced until December in each year.

98. Other difficulties face the Corporation. It is obliged to forecast expenditure for a period extending as much as eighteen months in advance, taking account of the effect on benefits of future wage and price movements. At the same time it must forecast the payroll base against which the variable levies have to be fixed for each of the classes. It is not easy to be accurate.

99. There seem to be clear advantages in moving to a system of payment by instalments despite some modest increase in costs of collection. We think it should be possible for the levies to be paid in future years by instalments. It appears however that a significant time must elapse before any suitable scheme could be put in place. We are examining, for example, the feasibility of a system which would enable an employer who elected to do so to make the payment at the same time as PAYE instalments are paid.

100. A wider question is whether the overall amount to be obtained from industry for work-related accident costs should be assessed against individual employers in the present fashion: by a purported classification of risk with consequential varying rates for employers in the different classes. Instead, should the required levy intake be obtained evenly from all? We turn to that general subject matter.

## CLASSIFICATION OF RISK

101. Retention of classification of risk involves at present a division of industry into no fewer than 103 classes together with self-employed persons as a separate class. In the case of the employer the recent increase affects all classes of industry. However it is likely that an increase of 80 cents (from 40 cents to \$1.20) in the case of employers of clerical workers could be absorbed rather more easily than the additional \$4.25 required from those in the business of tar-sealing. Or the more than four-fold increase of \$5.25 from \$1.45 to \$6.70 in the case of the meat industry. As an extreme example, there are the few remaining employers of pilots of aerial top-dressing aircraft. They have had to face a new levy of \$27.85, an increase of \$18.40. Each of these amounts is equivalent of course, to a wage increase in the same percentage terms.

102. Large numbers of submissions have been received by the Law Commission complaining of the hard effects upon individual employers which have resulted from the need to find amounts about three times larger (and in some cases a great deal larger) than had been budgeted for.

103. Questions need to be addressed as to whether there is a sufficient base against which statistical calculations can be prepared with any confidence for the 103 different classifications, many of which have numerous industries within them. The numbers employed in particular industries in New Zealand are so relatively small that one or two serious accidents could produce a disproportionate result.

104. It is certainly not difficult to find contrasts in the tables which seem unusual. To begin with, there are 5 classes of industry or occupation in which the number of employers is less than 10; and 37 classes in each of which less than 100 employers are engaged. For some reason a few manufacturers, for example those producing tobacco and cigarettes or batteries or dairy products, have their own class and rate while other manufacturers are grouped in single classes without regard to their differing activities. Similarly there is one class for retailers generally but a separate class for a few retailers, for example, wine and spirit merchants. The rates fixed for particular classes may also be compared. Those who are engaged in the manufacture of explosives, for example, now pay a levy of \$2.75 per \$100 of wages. At the same time the manufacturers of rubber mattresses must pay \$7.45.

105. The basis of classification becomes particularly important when it is realised that it is the past claims in each class that determine the levy rate. Those engaged in an industry with a declining payroll and a heavy load of past claims in respect of which compensation or other benefits are still being paid will have to carry the whole burden formerly shared with firms which have left the industry.

The freezing industry and the aerial top-dressing industry are cases where this is occurring. There seems no ready answer to the dilemma which would arise from allocating accident costs on this classification basis if most of the last few firms left operating in a particular industry were to close their doors. Conversely, so long as risk classification remains, the levies on employers in a new industry with an expanding payroll will not include a share of the costs of all past work-related accidents.

106. If the classification of risk principle were abandoned groups in the service industries would be brought up to an average figure of \$2.33, or \$2.47 if the self-employed were to be included on the same basis, at worst an increase of 106% and for most in these areas it would be much less. On the other hand to the extent that others would gain the benefit would go to those engaged more directly in the production of goods rather than services.

107. In support of such a move there are arguments that there is no economic benefit to be gained by loading considerable levies on to some groups of employers when much less is to be paid by others and that such a method is both inequitable and capable of producing extravagant differences in the levels affecting various classes. There are other claims that to the extent such charges are built into the cost of the product it is the consumer, the ordinary citizen, who finally pays; and the further point that the classification principle is a hangover from insurance concepts whereas the accident compensation system is no more than an element within our social welfare arrangements.

108. Against such a move there are arguments that each industry should be self supporting; that the classification principle promotes safety in the higher risk industries; and that it would be wrong to move away from an established method.

109. But these arguments in turn need to be evaluated against the interdependent nature of most industrial and business enterprise. Goods and services reach the ultimate consumer through a combination of activities carrying varying degrees of risk. Factors having nothing to do with the degree of risk involved affect the extent to which the cost of the levy can be fully passed on as part of the price of each transaction. The fact of interdependence makes the inequity all the greater if, at any one stage of the production and distribution process, the cost of paying the levy at the applicable rate has to come out of profits or, as seems more probable, is passed back to workers through lower wage rates or cutbacks in the numbers employed.

110. The Accident Compensation legislation was preceded by consideration of these various arguments. In the end the Select Committee which reported upon the Bill to the House of Representatives recommended a system of classification on the basis that "the present number of premium classifications be reduced

substantially". The reference is to the compulsory insurance system which had been underwriting the workers' compensation responsibility of employers. The Gair Report, as it has been called, then spoke of "15 or so different rates". The Report made the further observation -

"62. ... If further efforts to develop a satisfactory system of differential premium rates do not succeed, or if the cost of collecting premiums becomes excessive then the Royal Commission's proposal for a flat rate levy can be revived."

It may be helpful to add that it is now 41 years since the United Kingdom discarded the classification of risk principle.

111. It will be for industry to consider whether there should be a flat rate levy for New Zealand. It appears to the Law Commission that there is no other immediate way of alleviating the problems of the many employers who already have made submissions concerning the heavy increases they recently have had to face; and as mentioned in para.12 a large majority wish to have the accident compensation system continue in operation.

112. Cost savings must and will be examined. Those issues however cannot be answered in time for any early and significant change in the income requirements of the Corporation. Since employers who are paying higher levies are hoping for early relief we would be glad to have comment upon this matter of a flat rate levy. In particular, from those who may disapprove, we would like to know whether there appears to be any equitable and speedy alternative.

### SAFETY INCENTIVES

113. We have just been discussing the question whether there should be distinctions for the purpose of the calculation and payment of levies *between* different categories of employers. A different matter is whether there should be distinctions made *within* a category (whether there are 103 or one) based on the accident record of particular employers. Good employers, many contend, should get bonuses, and bad ones bear penalties. This is necessary, it is said, for reasons of safety and of fairness.

114. On its face the Accident Compensation Act 1982 accepts the contention. It empowers the Corporation to double the levies of those employers with bad accident records and halve the records of those with good ones. The power has, however, only rarely been used.

115. The argument has to be considered first in the general context of the methods of promoting safety and second in its own terms.

116. Other ways of encouraging safety have been suggested. Extending the waiting period from one week to, say, two weeks before the accident compensation scheme assumes any responsibility – an idea referred to in para.50 – is seen as one way of putting a greater onus on to the employer.

117. Another approach, but one which still rests partly on financial incentives, is to make employers criminally responsible for the breach of safety standards; but compliance with the law may not eliminate all the practices which give rise to a substantial number of minor preventable accidents such as strains.

118. A quite different approach which has gained support over the last 30 years is the education of management. Employers need to have a full appreciation of the causes of accidents, of hazardous processes and materials and of ways of enlisting the cooperation of all members of the workforce in taking safety precautions. One suggestion is to assess the accident prevention effort of an employer rather than the number and severity of injuries – an audit of the safety management system. As a prospective measure this has merit, but it requires considerable resources.

119. Accident prevention strategies, including the role of the Accident Compensation Corporation, will be discussed more fully in the second part of our work.

120. How is the power to increase or reduce levies for bad or good safety records to be seen against this brief sketch of some of the other incentives towards a safe workplace? Will experience rating act as an incentive to reduce injuries and their cost? There are grave doubts, at least in the general case.

121. First, some accidents and, even more so, the extent of injuries, are beyond the control of employers. Then, if other financial incentives, for example loss of production, spoilage of material, property damage and so on have not induced employers to institute effective safety programmes they may not do so even if charged penal rates. For this reason penal rates have to be very large to be effective, probably too large to be acceptable. Even then penal rates may not induce people to modify their behaviour because their perceptions of risks and outcomes are often wide of the mark. There is also a fear, based on what has happened in North America, that experience rating is counter-productive. Employers' efforts tend to be aimed at reducing claims rather than the number of accidents. This can lead to employers failing to report job injuries and illnesses. There is a recent example where one company was fined over \$US600,000 for under-reporting 121 instances.

122. A practical difficulty in trying to introduce experience rating in New Zealand is the small number of employees in most New Zealand enterprises. Ninety-eight percent of factories have 100 or fewer

workers. Experience rating is based on statistical methods and can only be validly applied where, by reason of the number of people employed, the number of injuries will not reflect the element of chance. Accidents are relatively rare events and the majority who do not have accidents would expect a bonus. The penalties imposed on the few who have accidents at a higher than expected rate could not balance all the bonuses. The base rate of levies would have to be increased to take account of the bonuses that would in due course be paid. For these reasons there is a real question whether experience rating could be applied to the average New Zealand employer.

123. Experience rating also loses its incentive impact if it is applied to the cost rather than the incidence of injuries. A good proportion of the cost relates to incidents of previous years and may be out of line with the current safety effort. Similarly it is generally accepted that such schemes are inappropriate for work related illnesses and diseases, many of which have a long latency period and only manifest themselves years after the original exposure to the offending toxic substance or contaminant.

124. For all of these reasons a system of penalties and bonuses seems unlikely to be effective in promoting safety or in reducing the costs of accidents which still occur despite safety precautions. Nor is there any reason to suppose that experience rating, even if practicable, would be any more effective than industrial classification in achieving equity. To the extent that the penalty or bonus is shifted on to consumer prices or leads to a reduction in the payroll, those responsible for the lack of safety prevention measures do not pay the price.

## PRIVATE INSURANCE

125. There may be misconceptions about the character of the accident compensation scheme which are due to the fact that it replaced systems supported by compulsory insurance provided by the private sector; and then began to receive income from the groups which had been paying insurance premiums. For some it may seem to be no more than an insurance system given over to the public sector. Probably for that kind of reason it has been suggested that aspects of the accident scheme should be given across to private insurers.

126. One underlying assumption is that private insurers would be able to provide comparable cover for less than the cost of the present levies. But in para.24 we compared the Corporation's present administration costs of 7.2% of total expenditure with the 30% or more of premium income absorbed by private enterprise insurance companies for administration, legal expenses and profit under the old workers' compensation insurance and the 40-50% under the motor vehicle compulsory third party insurance scheme. Extrapolating from



these figures, we calculated that if the Accident Compensation Corporation had operated on the same basis the cost of cover would by now have risen by something between \$189 million and \$398 million – that is an increase of 32% to 69%.

127. However, the system is not an insurance scheme any more than other parts of our social welfare system. The income which supplies it is derived from taxes – in part directly from the consolidated fund, as a pay-roll tax from employers, as a form of income tax from the self-employed and as an annual charge on motor vehicles which must be met by the owners. And the benefits it provides are there as of right for those who qualify in terms of the legislation to receive them.

128. Wider questions as to the wisdom or value in our society of moving important parts of the social welfare system into the private sector fall outside the scope of our inquiry. Nor would it be appropriate to anticipate by reference to this injury part of the system the basic conclusions of the Royal Commission on Social Policy which at present is deliberating on these among other major policy issues.

129. It may be useful in the present context, however, to pose a few questions –

- . Would a return to private insurance involve a return to adversary problems of the kind that led to the present statutory accident compensation scheme?
- . What would be the added expense of moving to private insurance?
- . Is the insurance industry itself interested in returning to these areas of personal liability insurance?
- . What is the position in other countries such as Australia, the United States and Britain?
- . If insurance were to become an individual and voluntary responsibility would people be too inclined to leave things to chance – or find other financial claims more pressing than taking out accident insurance for themselves and their families?

\* \* \* \* \*

130. Finally, in this discussion paper we have explained that, if there is to be any alteration in the basis of setting levy rates for employers and the self-employed under the accident compensation scheme, and the change is to affect the levies for the 1988/89 financial year, a

decision must be made soon, in time for amending legislation to be passed if necessary. We have made two suggestions which we ask you to consider, bearing in mind the nature of the accident compensation scheme as a whole. The first is that employers and the self-employed might be brought into one group for the purpose of calculating a levy at a single rate. The second is that there should be an option for paying the levy by instalments. We invite your comments on these questions by **8 October 1987**.

131. Additional time is needed to give proper consideration to the remaining issues which relate mainly to the benefits under the scheme and their cost. We invite those who would like to add to any earlier submissions or who have views upon any of these other questions to let us have their comments by **11 December 1987**.

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## APPENDIX A

Table 1

Source of ACC receipts (1974-1988) (\$million)

Year ended	Levies		Government Contribution	Investment	Income	Total
	employer	motor vehicle		Earnings	motor vehicle	
31 March						
1975	54.515	21.208	2.920	1.923	0.750	81.316
1976	62.071	20.415	5.036	4.737	1.551	93.810
1977	71.897	21.530	7.505	5.677	3.776	110.385
1978	79.458	22.248	10.902	9.068	6.113	127.789
1979	88.500	22.986	12.780	10.419	7.245	141.930
1980	111.426	23.985	13.531	15.450	9.695	174.087
1981	124.131	24.841	16.714	23.497	12.369	201.552
1982	149.319	25.650	22.785	28.189	16.447	242.390
1983	171.177	25.760	32.166	38.923	15.560	283.586
1984	202.929	26.111	35.219	42.547	18.531	325.337
1985	155.286	40.668	42.922	44.667	16.706	300.249
1986	173.132	41.415	60.117	50.529	17.295	342.488
1987	201.327	103.645	73.861	29.617	17.379	425.829
1988(est)	673.919	125.364	116.727		46.805	962.815

Table 2

ACC annual expenditure 1974-1988 (\$million)

Year ended 31 March	Account			Total
	Earners	Motor vehicle	Supple- mentary	
1975	25.266	4.562	2.920	32.748
1976	45.943	8.266	5.036	59.245
1977	61.833	12.004	7.505	81.342
1978	75.311	16.586	10.902	102.799
1979	82.334	19.021	12.780	114.135
1980	85.878	22.476	13.531	121.885
1981	107.403	25.292	16.714	149.409
1982	136.895	32.592	22.785	192.272
1983	180.439	40.322	32.166	252.927
1984	185.877	63.481	35.219	284.577
1985	222.943	74.242	42.922	340.107
1986	299.405	94.958	60.117	454.480
1987	387.778	119.094	71.405	578.277
1988(est)	543.813	154.761	99.423	797.997

Table 3

Amount paid for lump sums, earners' account, 1974-1987, (\$000)

Year claim made (y/e March)	1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985	1986	1987
1975	330	1106	2104	1726	481	225	169	132	97	67	56	104	155
1976		903	2784	4655	1502	649	476	379	212	113	97	156	176
1977			1261	4369	3380	1355	988	550	281	162	127	135	218
1978				1086	3960	3352	2077	1244	540	277	241	215	291
1979					902	3596	4164	2886	1113	410	287	313	409
1980						664	4179	6402	2712	899	508	509	498
1981							640	6061	8457	2783	1042	827	593
1982								800	8201	8779	3746	1782	1242
1983									1142	8304	12426	5834	2586
1984										1193	12580	21214	9435
1985											1616	19769	27366
1986												2408	28438
1987													4990
TOTAL	330	2009	6149	11836	10225	9841	12693	18454	22755	22987	32726	53266	76397

Table 4

Amount paid for lump sums, motor vehicle account, 1974-1987, (\$000)

Year claim made (y/e March)	Year payment made (year ending March)												
	1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985	1986	1987
1975	59	294	993	753	300	123	109	96	23	43	30	54	34
1976		306	764	1571	819	284	161	117	49	96	50	40	132
1977			403	1305	1414	811	429	146	178	39	60	80	72
1978				269	1300	1563	1177	594	223	123	78	99	121
1979					146	1013	2020	1551	496	235	160	122	102
1980						160	1101	3025	1669	470	272	283	261
1981							163	1952	4138	2257	736	351	357
1982								240	2183	5669	3090	988	658
1983									343	2705	6159	3654	1390
1984										613	3657	9930	5179
1985											749	5676	11121
1986												804	6995
1987													1408
TOTAL	59	600	2160	3898	3979	3954	5160	7721	9302	12250	15041	22081	27830

Table 5

Annual percentage increases in social service expenditure

Year ended 31 March	Annual % increase in expenditure							
	ACC	Health benefits	Grants to hospitals	D.S.W. benefits	D.S.W. social work	National Superannuation	Education (net)	CPI health services
1976	80.9	25.9					19.1	
1977	37.3	15.4		21.9	20.5		11.5	
1978	26.4	11.0		39.3	24.0		15.5	
1979	11.0	18.3		20.9	28.5	25.5	15.1	13.9
1980	6.8	14.2	16.6	16.9	23.6	14.7	8.6	20.6
1981	22.6	12.4	22.4	20.2	23.7	16.7	28.0	22.5
1982	28.7	15.3	19.4	17.5	20.4	21.8	15.6	24.8
1983	31.5	11.1	10.2	24.0	17.9	27.6	9.8	8.2
1984	12.5	8.3	0.4	8.3	11.1	4.4	2.2	2.7
1985	19.5	11.1	5.3	9.4	10.8	8.6	3.2	14.4
1986	33.6	30.8	12.9	22.0	23.9	21.8	16.3	19.5
1987	32.3		16.5		35.3	9.2	29.1	32.0

Sources:

ACC: Financial statements for years ending 31 March

Health benefits and grants to hospitals: Department of Health  
Annual Reports

DSW benefits and social work and national superannuation: Department of Social Welfare  
Annual Reports

Education: Department of Education Annual Reports

CPI health services: Department of Statistics





## APPENDIX B

Submissions were received from the following:

Aakronite New Zealand  
Aarque Systems N.Z. Ltd  
Abattoirs Assn. of N.Z.  
Abernethy Pringle Insulation Co. Ltd  
Able Personnel  
Abode Design & Build Ltd  
Accident Compensation Corporation  
Acco International (N.Z.) Ltd  
Accord Group  
Ackmead Holdings Ltd  
A.C.L.  
Acrow-Carpenter Ltd  
Action Against ACC Increase  
Adams, D. M.  
Addax Developments Ltd  
Adlite Aluminium Ltd  
Advanced Management Systems Ltd  
Advanced Parts & Spares Ltd  
Adventure Travel Shop  
Advisory Council for Occupational Safety & Health  
AFFCO  
Agfa-Gevaert  
Agrex Export & Marketing Ltd  
Agricultural Pests Destruction Council  
Ahuriri Pest Destruction Board  
Air Consortium N.Z. (1982) Ltd  
Air Transport (N.Z.) Ltd  
Alcan N.Z. Ltd  
Alexander Building Contractors 1985 Ltd  
R.G. & C. Alexander Ltd  
All-Kotes (N.Z.) Ltd  
Allan, P.G.  
L.R. Allen & Co. Ltd  
Allens Office Products Ltd  
Allied Mortgage Guarantee Co. Ltd  
Almec Industries  
Aloette  
Alpha Secretarial and Taxation  
Aluminium Surface Finishers (1987) Ltd  
Ampro Sales Ltd  
Amputees Federation of N.Z. Inc.  
Anchor Fence Ltd  
Anchorage Bay View Motel  
Anglo Engineering Ltd  
Anthony Marquet Ltd  
Anton's Seafoods Ltd  
Anvil Jewellery Ltd  
Anzdec Ltd  
Apex Engineering Ltd

Appeal Furniture Co. Ltd  
Applied Power  
Aquatic Park  
Aquaheat Industries Ltd  
Arborfold Industries Ltd  
Arco Engineers Ltd  
Ardmore Commission Knitters  
Argus Distributors (N.Z.) Ltd  
Argus Fire Sprinkler Systems (N.Z.) Ltd  
Ariki Industries Ltd  
Aristocrat Lights  
Armacup Shipping & Chartering  
Arthur Webster (N.Z.) Pty Ltd  
A.S.E.A. Electric (N.Z.) Ltd  
Ashfield Engineering Ltd  
Ashley-Waikari Pest Destruction Board  
Ashman's Roofing Services Ltd  
Associated Northern Ltd  
Aspak Industries Ltd  
E. Astley & Sons Ltd  
Atlantic & Pacific Travel International Ltd  
Auckland Agricultural Pastoral & Industrial Shows Board  
Auckland City Council  
Auckland Electrical Services Ltd  
Auckland Gas Co. Ltd  
Auckland Hospital Board Advisory Committee on  
Geriatric Services  
Auckland Knitting Mills Ltd  
Auckland Mailing Service Ltd  
Auckland Master Builders Association (Inc.)  
Auckland Packaging Co. Ltd  
Auckland Regional Chamber of Commerce  
Auckland Sewing and Knitting Machine Specialists Ltd  
Auckland & Tomoana Freezing Workers Union  
Arthur Gibbs Ltd  
AUTOL  
Automatic Transmissions Ltd  
Automobile Association (Auckland) Inc.  
Avery Leuschke Architects Ltd  
Avery-Wood Ltd  
D. & C. Avey Ltd  
Aviation & Industrial Distributors Ltd  
Aviation Industry Association of N.Z. (Inc)  
Aviation Industry Association of N.Z. (Ltd)  
A.W.A. Computers  
Axent Audio Products Ltd

Bailey Design and Drafting Ltd  
G. & M. Ballentyne Ltd  
Banner International  
Bayline Group Ltd  
Bay Mowers & Machinery Ltd  
Bay of Islands County Council  
Bay of Islands Veterinary Service

Bay of Plenty Asphalt Ltd  
Bay of Plenty Harbour Board  
Bay of Plenty Weed Control  
B.D.M. Ltd  
Beacon  
Beacroft Bros. Export Ltd  
Bedlam Brass Beds Ltd  
Belfast Wool Co. Ltd  
Bendon Industries  
Benefield & Lamb Ltd  
Bennett, D. S.  
Bennett, Mackay, Mullany & Robinson  
Berkeley Services  
Best Western  
Better Living (Peter Ferris) Ltd  
Betts Engineering Ltd  
Bissett, Hodge & Rainey  
B.L.M. Engineering Co. Ltd  
Blenheim Electric House (1985) Ltd  
Blenheim Food Products Ltd  
Blighs Road Service Station  
Blow Moulders Ltd  
Blue Grass Products Ltd  
Blyth, M.  
Bonds (N.Z.) Ltd  
Bonito Industries Ltd  
Booksellers Assn. of N.Z. Inc.  
Booth, G.  
Border Construction Ltd  
Bourneville Furniture Co. Ltd  
Bowring Burgess Marsh & McLennan Group  
Bradmill Industries (N.Z.) Ltd  
Bradshaw Builders Ltd  
Braithwaite, G. H.  
Briscoes (N.Z.) Ltd  
Brittains Pharmacy (1980) Ltd  
Broscos Ltd  
M. & L. Brown Ltd  
Brown, Woolley & Graham  
Brownings Secretarial Services Ltd  
Bryce Francis Ltd  
G. Buchan Water Treatment Co. Ltd  
Bull, J.  
Bumper Replacements (N.Z.) Ltd  
Burlton, A. B.  
Burnard Bull & Co  
Burns Hart and O'Shea  
Burwood Hospital Spinal Injuries Unit  
Bushells Ltd  
Business Machines Ltd  
Butland Industries Ltd  
Byers Hayward Weber  
Byron Manufacturing Co. Ltd

Campbell Engineering Ltd  
Campbell-Renton Hardware Ltd  
Campbell Tube Products Ltd  
Cambridge Clothing Co. Ltd  
Canadian Pacific Air Lines  
Canterbury Furniture Trade Industrial Union of Workers  
Canterbury Rubber Workers Industrial Union of Workers  
Canterbury Sheepskin Accessories Ltd  
Capistrano Restaurant  
Caravan Repairs (Auckland) Ltd  
Carbines & Smith Ltd  
Career Centre Ltd  
Carlin International Ltd  
Carlton Cranes  
Carlton Publishing Ltd  
Carousel Turntables  
Carparts  
Carpet & Furniture Warehouse  
Carpetland  
Carrick Sheetmetals Ltd  
Carswell, J. F.  
Carter, J.  
Carter, T. C.  
Cashmore Bros Ltd  
Castle Furniture Sales & Marketing Ltd  
C.B.S. Engineering Ltd  
Cedar Lodge Nurseries  
Celestial Hair Design  
Central Bay of Plenty Pest Destruction Board  
Centrepont Jewellers  
Centron Corporation  
Century Hutchinson N.Z. Ltd  
Cerobos Gregg's Ltd  
Certified Welding Ltd  
Chadwick Road Jewellers  
Chadwick Road Super Discounter  
Chamber of Commerce & Industry of Northland Inc.  
Charles Donoghue & Associates  
Charley Browns Restaurant  
Chatwin Group  
Chaytor Fences  
Cherry Island Ltd  
Cherry Island Travel  
Chilton Ross & Co  
Christian Aviation  
Christchurch School of Medicine  
Christian Science Committee on Publication for N.Z.  
Chronos Extrusions Ltd  
Civray Ltd  
Clark and Matheson Ltd  
Clark Signs Ltd  
Clarks Shoes Ltd  
Classic Waterbeds  
W.J. Clelands & Sons Ltd  
Clyde Fruitgrowers Association

Coachwork International Ltd  
Coates Brothers (N.Z.) Ltd  
Colchester Engineering Ltd  
Cole, Dr. D. S.  
Colin Davis Panelbeaters  
E. M. Cook Ltd.  
Comanco  
Combined State Services Union  
Comesky, G. P.  
Commercial Furniture  
Committee on Brucellosis  
Commodore Computer (N.Z.) Ltd  
Communication House (N.Z.) Ltd  
Company Catering Co.  
Complete Home Appliance Services  
Composite Developments (N.Z.) Ltd  
Computer Transport Services (N.Z.) Ltd  
Conform N.Z. Ltd  
Connor, B. J.  
Conspan Industries Ltd  
Construction & Maintenance Engineering Ltd  
Construction Machinery Ltd  
Container Terminals Ltd  
Continental Engineering Ltd  
Contract Connections Ltd  
R. N. Cook Export (N.Z.) Ltd  
Cooke Howlison  
Cookes  
Cookie Time Ltd  
Cooper, G. B.  
Cork Supplies (N.Z.) Ltd  
Corporate Resources Group  
S. V. Cosgrave & Sons  
Cosmopolitan Agencies Ltd  
Cospac Industries Ltd  
Cost Services Ltd  
Counterstroke N.Z. Inc  
Court Hobday Spraying  
C.P.I.  
Craig, L.  
Crane Accessories Ltd  
Cranwell Publishing Group  
R. Creagh & Co. Ltd  
Crisps Agencies & Exports Ltd  
Croda Polymers (N.Z.) Ltd  
Crown Watching & Commercial Security Services (N.Z.) Ltd  
W.G.G. Cuddon Ltd  
Cullimore, K.  
Cunningham, A. B.  
Cut Above Hairdressing Salons Ltd

Dargaville Concrete Products  
David Lloyd Group of Companies  
Davis Building and Masks Ltd

Davis Gelatine (N.Z.) Ltd  
Davis, Dr. P.  
Delphi Industries Ltd  
DeNeefe Signing Systems Ltd  
Dennis Hall Decorators Ltd  
J. E. Dennis Ltd  
Dependable Engineering Ltd  
Derek Batts Ltd  
Detection Alarm Systems Ltd  
Dickson, A. M.  
Dickson Display Co. Ltd  
Diners Club International  
Disabled Persons Assembly (N.Z.) Inc  
Domett Fruehauf Trailers (BOP) Ltd  
Dominion Containers Ltd  
Dominion Paper Products Ltd  
Dominion TV Rentals Ltd  
D.S.L. Group  
Dulmison (N.Z.) Ltd  
Duncan Blaikie Ltd  
D.Y.C. Demolition Ltd

Eade Engineering Ltd  
Eagle & Globe Steel (N.Z.) Ltd  
Eamar Plastics Ltd  
Earnsclough Fruitgrowers Assn. Inc.  
East Otago Pest Destruction Board  
Eastern Bay Traders (1979) Ltd  
Eastwood, Dr. J. G.  
E.C.C.  
Educational Distributors Ltd  
Eddy's Pharmacy  
Edward Dickson Ltd  
A.A. Edwards & Sons Ltd  
E.L.K. Forklifts & Hydraulics Ltd  
Elders Pastoral Ltd  
Electric Construction Co. of N.Z. Ltd  
Electric Measurement and Control Ltd  
Elite Engineering Ltd  
El-Jay (N.Z.) Ltd  
Elm Decorators Ltd  
Eloise Products Ltd  
Elsworth, A.  
E.M.C Electronics Ltd  
EMMS Building Centre  
Emoleum (N.Z.) Ltd  
Engineering Plastics Ltd  
Engine Rebuilders Ltd  
Enterprise MFG Co. Ltd  
Enzed Technology International Ltd  
Eric Diggelmann & Sons Ltd  
Eric Paton Ltd  
Ernst & Whinney  
ESSAR (N.Z.) Ltd

Ettrick Fruitgrowers Association Inc.  
Eurographic Arts Ltd  
Eurolab Laboratories Ltd  
European Motor Distributors Ltd  
Europlan Industries Ltd  
Executive Electrical Ltd  
Evans, M. W.  
Exotic Logs Supply  
EXXTEL

Fabric Printers  
Factory and Plant Maintenance Ltd  
Fan and Light Company  
Farquhar, I. M.  
Federated Farmers of N.Z. (Inc.)  
Federated Farmers of N.Z. (Mid-Canterbury Provincial District Inc.)  
Federated Farmers of N.Z. South Canterbury Provincial District (Inc.)  
Federated Farmers of N.Z. Inc. (Southland Provincial District)  
Federated Farmers of N.Z. (Waikato Provincial District) Inc.  
Federated Farmers of N.Z. (Inc.): Women's Division  
Federated Farmers: Manawatu and Rangitikei Provinces  
Federated Farmers of N.Z. (Inc.): Kakepuku  
Fermentation Industries (N.Z.) Ltd  
Ferrocast Machine Tools Ltd  
Fidelity Printing Co. Ltd  
Field, B. D.  
Field International Ltd  
Fielden Smith Builders  
Financial Systems Ltd  
Finewood Furniture Ltd  
Finnemore Refrigeration Ltd  
Firestone  
Fleete Engineering Ltd  
Fleming, F.  
Fletcher Fishing Ltd  
Fli Cargo (N.Z.) Ltd  
Flight & Field Services Ltd  
Flooring Enterprises Ltd  
Foodstuffs (Auckland) Ltd  
Foodtech Ingredients Ltd  
Foote, D. K.  
Forbes & Co  
Forgan Jones Co. Ltd  
A. Foster & Co. Ltd  
Foundation Techniques Ltd  
Fox & Gunn Ltd  
Franklin Electric Power Board  
Franklin County Council  
Fraser, Venning & Crerar  
Freight & Bulk Transport Holdings Ltd

Fryco Products Ltd  
F.S. Design Ltd  
Fuelquip  
H.B. Fuller Co. (N.Z.) Ltd  
Furniture and Fitments

Gainsborough Printing Co. Ltd  
F.R. Galantai Mnfg Co. Ltd  
Gallagher Group of Companies  
Gang-Nail N.Z. Ltd  
GAP Imports Ltd  
Gartner Engineering Ltd  
Garry Aspinall Signs  
GEC (N.Z.) Ltd  
Gearbulk Shipping (N.Z.) Ltd  
Geary, E. C.  
Gelco Ltd  
General Equipment Company Ltd  
Geoffrey M. Shortt Ltd  
Geordie Food Services Ltd  
George, F.  
Geraldine Licensing Trust  
Giant Auto Products Ltd  
Giles People  
Gilligan & Co.  
Glenfield Plumbing Services Ltd  
Globe Hotel  
G.M.P. Holdings Ltd  
Goble, R. A.  
Golden Harvest Licensed Restaurant  
Gooder Electrical Ltd  
Goodman, O.  
Goods Saddlery  
Gordon, G. D.  
Grant Blake Builders Ltd  
Graphic Arts Platemakers Federation of New Zeland  
Greatlake Motor Co. Ltd  
Green Island Print Ltd  
Greenwood, R.  
Greerton Books and Toys  
Greerton Flower Haven  
Greerton Hardware Ltd  
Greerton Menswear  
Greerton Pharmacy Ltd  
Greerton Sewing Centre  
Greymouth Book Exchange Society (Inc)  
Griffin & Sons  
Griffin Savage Co. Ltd  
Griffiths, G.  
Group Trade Ltd  
Grout Seal Ltd  
Gulf Manufacturing Ltd  
Guthrie's Jewellers Ltd



Hairfashions Epsom  
Hair World  
Hakataramea Valley Pest Destruction Board  
Hall, N. C.  
Hall Shopfitting  
Hamilton City Council  
Hansen & Berry Ltd  
H.P. Hanna & Co.  
Harbours Assn. of N.Z.  
Harbro Trading Co. Ltd  
Harkin Roofing Ltd  
Harmony Furniture Ltd  
Harris Electrical  
Harrod, R. J.  
Harry Liddle Ltd  
Hart's Printing Co. Ltd  
Harvey Furnishings Ltd  
Hawera Engineering Co. Ltd  
Hawkes, M.  
Hawkes Bay Fibrous Plaster Ltd  
Hawkes Bay Fruitgrowers Association Inc.  
Hawkes Bay Rape Crisis Centre  
F. Hayes & Co. Ltd  
Hayes Metal Refineries Ltd  
L.T. Hayman Ltd  
D. Haynes Engineering Ltd  
Hazlewood Transport  
Headway Salon  
Healing Industries Ltd  
Health Equality for All  
Heatons Transport Ltd  
Heat and Control Ltd – Greer Division  
Help Foundation  
Henderson Productions (1982) Ltd  
Hennessy Grading Systems Ltd  
B.W. Herbert Ltd  
Hermeck Aluminium Ltd  
Hermes Manufacturing Ltd  
Hervey Motors Ltd  
B. & M. Hieatt Ltd  
Highflo Company Ltd  
Hill, J.  
Hillock, Dr. J.  
Hills Floorings Ltd  
Hiremaster  
Hokianga County Council  
Holiday Clothing Co. Ltd  
Holmden Horrocks & Co  
Home Improvements (Tga) Ltd  
Honey Village  
Honomiro Spinners Ltd  
Horowhenua County Council  
Horizon Aluminium Products Ltd  
Horrocks, J. B.  
Horsburgh, R. B.

Hosking Nurseries Ltd  
Hospital Boards Association of N.Z.  
Howse, N. W.  
Hoyle Industries Ltd  
H.T.C. Import Service  
H.U.B. Furniture Warehouse Ltd  
Hubbard & Blue Ltd  
Hughes, J.  
Hughes and Cossar Holdings Ltd  
Hughes and Cossar Machinery Ltd  
Hutchinsons (Wholesale) Ltd  
Hutt Valley Industrial Electricians Ltd  
Hy-Craft Sheetmetals Ltd

Ian Morrow Industries Ltd  
Ian Roebuck Crane Hire  
Ideal Constructions (Auck) Ltd  
Ideal Garages  
Impact Windows Ltd  
Independent Newspapers Ltd  
Industrial Clutches Ltd  
Industrial Plant & Technics Ltd  
Industrial Technology (INTEC) Ltd  
Industrial Tooling Ltd  
Inglewood Engineering Ltd  
Inglis, I. A.  
Ingram, B. C.  
Inmetals Trading (Auckland) Ltd  
Inmetals  
Insapine Industries Ltd  
Instant Freeline  
Institute of Directors N.Z. Division  
Insurance Council of N.Z.  
Ipsco  
Ison, Prof. T. G.  
Ivon Watkins-Dow Ltd

Jackson Appliance Services  
Jackson, Allison Medical & Surgical Ltd  
Jacobs, Florentine & Partners  
Jaeco Industries Ltd  
Jakaar Plastics Engineering Industries Ltd  
James Miers Associates Ltd  
James Nilsson Ltd  
Janome Sewing Maching Co. (N.Z.) Ltd  
Janssens Industries Ltd  
Janus Cleaning & Consultancy Ltd  
Japan Line  
Jenny's Childrenswear  
M.L. Jerard & Co. Ltd  
J.I.F.  
John Bockett Pharmacy Ltd  
John Goodman & Co. Ltd

John Henderson Ltd  
John P. Young & Associates (N.Z.) Ltd  
John Vaughan & Co. Ltd  
Johns Kitchenmakers Ltd  
John M. Fraser & Co. Ltd  
John McGlashan College  
John W. Shackelford & Son Ltd  
Jonathan Enterprises Ltd  
Johnson & Johnson Ltd  
Johnson Matthey Ltd  
Joinery Developments & Investments Ltd  
Jonel Corporation Ltd  
Jones & Sandford Ltd  
Just Joinery Ltd

Kagans  
Kaingaroa Logging Contractors Association (Inc.)  
Kaikoura Pest Destruction Board  
Kaipara Excavators Ltd  
Kaitaia Chamber of Commerce  
Kakanui Range Pest Destruction Board  
Kays The Wool Specialists  
KBT General Carriers  
W. W. Keighley & Co. Ltd  
Kel Aiken Printing Co. Ltd  
Kelly & Bryant  
Kenner Parker (N.Z.) Ltd  
Kennick Trading (International) Ltd  
Kerikeri Fruitgrowers Society (Inc.)  
Keruse & Gairdner  
Kidd Garrett Holdings Ltd  
Kindercare Learning Centres Ltd  
King, N. W.  
King Country Electric Power Board  
Kingston Catering and Providoring Co. Ltd  
Kingston and Partners  
Kingsway Outfitters Ltd  
Kirk Barclay: Rotorua  
Kirk Barclay: Auckland  
Kiss Cola  
Kitt Associates Ltd  
J.B. Klue Ltd  
Knight, B.  
Knitwit Fabrics (N.Z.) Ltd  
Konditorei Aida  
Kovacs Design Furniture Ltd  
Koves Buttons Ltd  
KRTA Ltd  
Kurow Pest Destruction Board

Labour Department  
Ladbrook Hardware Ltd  
Lambswool Corporation Ltd

G. H. Lander Ltd  
Laser Lab  
La Trobe Hall Joinery Ltd  
Lawler Bros  
Lawrence Anderson Buddle  
G. R. Leech & Co  
Legge Pacific Ltd  
Leigh Motel  
H. Leighton Hill Ltd  
Leonard & Dingley Ltd  
Les Cheveux  
Les Mills Corporation Ltd  
Letraset Systems (N.Z.) Ltd  
Levene & Company Ltd  
Lichfield (N.Z.) Ltd  
E. Lichtenstein & Co. Ltd  
Lilly, E.  
Limited Express  
Lines, H.  
Line Seven (1986) Ltd  
Lintex Fabrics  
R.A. Lister N.Z. Ltd  
Littlejohn Machinery Ltd  
Loburn Fruitgrowers Association  
Lobb & O'Connor Electrical Ltd  
Local Authorities' Officers' Assn  
Logan Office Furniture Ltd  
Longstaff, M. D.  
Lotus Yachts  
Lucas Industries N.Z. Ltd  
Lynch, H.  
Lyon Ford

T. A. Macalister Ltd  
M. McCarthy Engineering Ltd  
Macdonald, A.  
McDonald's System of N.Z. Ltd  
MacEwans Machinery Ltd  
Macgregor Plumbing  
McHugh, McKenzie & Sherwin  
McKay's Radio & Electrical House  
Mackenzie Basin Pest Destruction Board  
McKinstry, B. A.  
McLaughlan, L.  
Maessen, J.  
Magazine Publishers' Assn. of N.Z. Inc.  
Mahana Fruitgrowers Association  
Mainland Seafoods (1972) Ltd  
Maison Monique  
Malcolm Fowler Motors Ltd  
Manaia Engineering Ltd  
Manawatu Catchment Board  
Manawatu Co-operative Dairy Co. Ltd  
Manawatu Pest Destruction Board

Mangere Health Centre  
Mangonui County Council  
Manning-Voyce & Associates Ltd  
Mansion House  
Manuels Beach Resort  
Markcom Print  
Mark Petch (N.Z.) Ltd  
M. W. Marketing Ltd  
Marlborough Electric Power Board  
Marlborough Express  
Marlborough Fruitgrowers Assn  
Marlborough Pest Destruction Board  
Marlborough Regional Pest Authority  
Marlborough Textiles  
Marleen of Cherrywood  
A.C. Martian Industries Ltd  
Martin Harwood Ltd  
Martin Roberts Motors Ltd  
Masterton Plumbing Services  
Matthews, E. M.  
Matthews Masonry Ltd  
Mavlin Industries Ltd  
Maxwell Purdy & Partners Ltd  
Meale Engineering Co. Ltd  
Meatex (N.Z.) Ltd  
Mechanical and Welding Services  
Medical Council of N.Z.  
Medical Laboratory  
Mental Health Foundation of N.Z.  
Mesco Liquid Air Ltd  
Mestrom, W. H.  
Metal Pressing & Forming Ltd  
Metal Spinners Ltd  
Metro Ford  
Metrology Techniques  
Mid-Canterbury Industries Ltd  
Middlemore Hospital Rehabilitation Committee  
Midland Transport Services Ltd  
Mike Vinsen Ltd  
Miles Nelson Manufacturing Co. Ltd  
Milford Bathroom Court  
Miller, Prof. R.  
Miller Moyes Seacraft Ltd  
Mills Bakery Ltd  
Milog Holdings N.Z. Ltd  
Mines, Q.  
Ministry of Transport  
Ministry of Works & Development  
Minogue, J. F.  
Models (N.Z.) Ltd  
Modern Bags Ltd  
Moffat Appliances Ltd  
Mold Makers Ltd  
Moon, M. H.  
Moore Business Forms & Systems Division

J. P. Morgan Real Estate  
 Morrow Furniture Ltd  
 Motor Rebores (U.H.) Ltd  
 Motor Trade Association (Inc.)  
 Motueka Fruitgrowers Association  
 Moutere Hills Fruitgrowers  
 Mr Chips Ltd  
 MSAS Cargo International  
 Mt Roskill Borough Council  
 Muir Crane Hire Ltd  
 Multichem Laboratories Ltd  
 Municipal Association of N.Z. Inc  
 Munro, J. C.  
 Murray, J. B.  
 P. M. Muskett Ltd

National Association of Retail Grocers & Supermarkets  
 of N.Z. (Inc.)  
 National Business Review  
 National Collective of Rape Crisis & Related Groups  
 of Aotearoa Inc.  
 National Collective of Independent Women's Refuges Inc.  
 National Council of Women of N.Z. Inc  
 National Union of Railwaymen  
 Neilson Properties Limited  
 Nelmar Plastics Ltd  
 Nelson City Council  
 Nelson Fruitgrower's Assn. Inc.  
 Nelson Suburban Club  
 N.Z. Alpine Club Inc.  
 N.Z. Amalgamated Engineering and Related Trades  
 Industrial Union of Workers  
 N.Z. Artificial Limb Board  
 N.Z. Assembly for Sport (Inc.)  
 N.Z. Automobile Association  
 N.Z. Bankers Association  
 N.Z. Berryfruit Growers Federation (Inc)  
 N.Z. Boxing Association Inc  
 N.Z. Business Roundtable  
 N.Z. Business Speakers Bureau  
 N.Z. Chambers of Commerce (Inc.)  
 N.Z. Chiropractors Association Inc.  
 N.Z. Contractors Federation (Inc.)  
 N.Z. Contractors Federation (Inc.): Nelson-Marlborough  
 Branch  
 N.Z. Co-operative Wool Marketing Assn. Ltd  
 N.Z. Cosmetic Laboratories Ltd.  
 N.Z. Crippled Children Society (Inc.): Tauranga Branch  
 N.Z. Crippled Children's Society Inc.  
 N.Z. Dairy Factories' Industrial Union  
 of Employers  
 N.Z. Defensive Driving Council Inc.  
 N.Z. Dental Association Inc  
 N.Z. Direct Marketing Assn. Inc.

N.Z. Disabilities Resource Centre  
 N.Z. Electrical, Electronics and Related Trades  
   Industrial Union of Workers  
 N.Z. Electrical Supply Authorities Industrial  
   Union of Employers  
 N.Z. Employers Federation  
 N.Z. Engineers Merchants' Assn.  
 N.Z. Ergonomics Society  
 N.Z. European Shipping Assn.  
 N.Z. Federation of Commercial Fishermen  
 N.Z. Federated Hotel Trades Employees' Industrial  
   Assn. of Workers  
 N.Z. Federated Painting Contractors Industrial  
   Assn. of Employers  
 N.Z. Federation of Labour  
 N.Z. Federation Personnel Services (Inc.)  
 N.Z. Federation of Voluntary Welfare Organisations (Inc.)  
 N.Z. Flax Hybridisers Ltd  
 N.Z.F.P. Forests Ltd  
 N.Z. Fruitgrowers Federation  
 N.Z. Fruitgrowers Federation: Gisborne Fruit Advisory  
   Committee  
 N.Z. Furniture Manufacturers Federation Inc.  
 N.Z.-German Business Association Inc.  
 N.Z. Harbour Workers Union  
 N.Z. Institute of Health Administrators  
 N.Z. Institute of Safety Management Inc.  
 N.Z. Insulators Ltd  
 N.Z. Local Government Employers Assn.  
 N.Z. Loggers Assn. Inc.  
 N.Z. Manufacturers Federation  
 N.Z. Manufacturing Engineers Federation  
 N.Z. Masonry Trades Employers Federation Inc.  
 N.Z. Master Builders' Federation (Inc.)  
 N.Z. Meat Industry Association Inc.  
 N.Z. Medi-Care Society  
 N.Z. Medical Association  
 N.Z. Motel Federation  
 N.Z. Motor Body Builders' Assn. Inc.  
 N.Z. Motor Vehicle Assembly Industry  
 N.Z. Nurserymans Association Inc.  
 N.Z. Nurses Union  
 N.Z. Offshore Services Ltd  
 N.Z. Optical Ltd  
 N.Z. Orthopaedic Association  
 N.Z. Pain Society  
 N.Z. Planning Council  
 N.Z. Private Hospitals Association Inc.  
 N.Z. Private Hospitals Assn. Inc. Canterbury Branch  
 N.Z. Private Hospitals Industrial Union of Employers  
 N.Z. Public Service Association (Inc.)  
 N.Z. Red Cross Society  
 N.Z. Refining Co. Ltd  
 N.Z. Register of Osteopaths Inc.  
 N.Z. Resident Medical Officers Association

N.Z. Retailers Federation  
 N.Z. Retail Meat & Allied Trades Federation Inc.  
 N.Z. Ribbon Manufacturers  
 N.Z. Road Transport Association Inc.  
 N.Z. Rugby Football Union  
 N.Z. Salmon Co. Ltd  
 N.Z. Seamen's Union  
 N.Z. Shearing Contractors  
 N.Z. Shipping Agencies International Ltd  
 N.Z. Society of Accountants  
 N.Z. Society of Accountants: Northland Branch  
 N.Z. Society of Physiotherapists Inc.  
 N.Z. Speech Language Therapists Association Inc  
 N.Z. Sugar Company Ltd  
 N.Z. Timber Industry Employees Industrial Union  
     of Workers  
 N.Z. Timber Industry Industrial Union of Employers  
 N.Z. Trampoline Association  
 N.Z. Watersiders' Federation  
 N.Z. Wholesale Wine & Spirit Merchants' Federation  
 N.Z. Wood Creations Ltd  
 N.Z. Workers Union  
 Newman, R.  
 Nicholson, O. R.  
 Nicholas Kiwi (N.Z.) Ltd  
 Niepold, D. A.  
 Noble Lowndes (N.Z.) Ltd  
 Northern Foods Ltd  
 Northland Cooperative Dairy Co. Ltd  
 Nu-Look Windows Wellington Ltd  
 Nurses Society of N.Z.

#### OAS

Oasis Industries Ltd  
 Ockleford, L.  
 O'Flaherty, P.  
 Ohai Railway Board  
 P.F. Olsen & Co. Ltd  
 Omarama Pest Destruction Board  
 Onehunga Borough Council  
 Onehunga Glass  
 Oregon Paint Co. Ltd  
 Orewa Business Association  
 Osflo Spreading Industries  
 Otago Hospital Board: Physiotherapy Department  
 Otago University, University Extension  
 Otago University School of Dentistry  
 Otahuhu Trading Co. (1983) Ltd  
 Otumoetai Health Centre

Pablo Industries  
 Pace Control Ltd  
 Pacer Car Clean Products (N.Z.) Ltd



Pacific Plumbing Appliances Ltd  
Pacific Steel Ltd  
Pacific Tooling (1983) Ltd  
Packaging House Ltd  
Packaging Recyclers Ltd  
R.H. Page Ltd  
Pain Action in N.Z.  
B.W. Palmer Ltd  
D.M. Palmer Ltd  
Palmerston North Hospital Medical Rehabilitation Unit  
Panel Brick Veneer (N.Z.) Ltd  
Papanui Farms  
Paper Moon Graphics Ltd  
Paramount Trading Co. Ltd  
Parkin Glass & Mirror Co. Ltd  
Parkinson & Bouskill Ltd  
Parr & Co. Ltd  
Partridge Construction Ltd  
Payen N.Z. Ltd  
Paykel Engineering Ltd  
PDL Industries Ltd  
PEL Industries Ltd  
Peco Ltd  
Pegler, C.  
R.U. Penning & Associates  
Perillo Brothers Ltd  
Perkins, W.  
Permaclean  
Perrott & Partners Ltd  
Peter Barrett Jewellery Ltd  
Peter Zidich Hairdressing  
Petralgas Chemicals N.Z. Ltd  
Petty, G. B.  
G. Pezaro & Son Ltd  
Pfaff Sewing Machines  
Pharmaceutical Manufacturers Assn N.Z. Inc.  
Phillips & Smith Ltd  
Phillips & Smith Manufacturing Ltd  
Philo, G.  
Phil-stic Ltd  
Phoenix Printing Co. Ltd  
Photographic Wholesalers Ltd  
Physiotherapy & Sports Medicine Clinic  
Pinex Timber Products Ltd  
Pipeline Supplies (1977) Ltd  
Piper Inflatables Ltd  
Planscape  
Plastercraft Ceilings (Wgtn) Ltd  
Plastic Packaging Specialists  
Plastics Institute of N.Z.  
Plummer Pneumatics  
Pneumatic Products Ltd  
Pool Bros. Ltd  
Poole & Lewis  
Portable Sanitation Co.

Post Office Union (Inc.)  
Power & Buckley Ltd  
Power Crane Association of N.Z. (Inc.)  
Prentice, T. W.  
Prentice & Toohill  
Prime Freight Ltd  
Printcorp  
Printing Establishment  
Printing Industries Federation of N.Z.  
Printlines Ltd  
Printpac  
Printworks  
Process Electronic Industries Ltd  
Process Systems Ltd  
Proconsult Associates Ltd  
Professional Computer Supplies  
Professional Electronics Ltd  
Professional Uniform Co. Ltd  
Project Construction Ltd  
Pronto Watch Company  
Protec Systems  
Puketaha Packaging Ltd  
Purser, D. M.  
Pyne Gould Guinness Ltd

Quality Transfer & Labels (N.Z.) Ltd  
Quark Dairy Products Ltd  
Quik Stik International Ltd  
Quin Custom Buildings (TGA) Ltd

Race Industries (N.Z.) Ltd  
Radiant Transfer Co. Ltd  
Radley & Co. Ltd  
Raglan County Council  
Ramset Fasteners (N.Z.) Ltd  
Rangatira Mower Centre  
Raspberry Marketing Council  
Ray Goldfinch & Co. Ltd.  
Raymons Pies  
Reflex Products Ltd  
Refrigerated Freight Lines Ltd  
Reg Pharaoh (1983) Ltd  
Regional Publishers Ltd  
Reid & Twiname Ltd.  
Reinink's Wrought Iron Ltd  
Rennie, D. A.  
Renton Hardware Co. Ltd  
Revertex Industries (N.Z.) Ltd  
Reynolds, D. J.  
Rhema Sales Ltd  
Ricco Refrigeration  
Richardsons Fashions and Fabrics  
Richfield Waterbeds

Richmond Borough Council  
Ridley Motors Ltd  
Ridley Motors (Turangi) Ltd  
Ridleys Boatshed  
Riegers Home Appliances Ltd  
Rigby James & Partners  
Rivercity Pharmacy  
R.M.S. Marketing  
Road Runner Trailers Ltd  
Road Transport Council of N.Z. (Inc.)  
Robert Bryce & Co. Ltd  
Robertsons  
Robt Stone & Co. Ltd: Tokoroa  
Robt Stone & Co. Ltd: New Plymouth  
Robt Stone & Co. Ltd: Waiuku  
Robinson, M. B.  
Rocol Cleaning Services  
Rod Douglas (1981) Ltd.  
Rohm and Haas N.Z. Ltd  
Rola Systems Ltd  
Roland Wimmers Fashion Consultant  
Roll Formers N.Z. Ltd  
Rotgans, J.  
Rothmans of Pall Mall (N.Z.) Ltd  
Roulston Greene  
Rout, H.  
Royal N.Z. College of General Practitioners  
Runnersworld  
Russell & Somers Travel  
Ryder-Lewis, N.  
Rylock Windows & Doors

Sadler, M. D.  
St George's Hospital Inc.  
Order of St. John  
Samuel Marsden Collegiate School  
Sandersons Mkt Gardens Ltd  
Sanding and Grinding Specialties Ltd  
Sapac Developments Ltd  
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Screen Pack Ltd  
Seabridge N.Z.  
Sea Craft Ltd  
Sea-First  
Sealord Products Ltd  
G.D. Searle (N.Z.) Ltd  
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Sedon and Associates

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Sewell & Wilson  
Sewing Machine World Ltd  
Shaw, J. V.  
Sheldon & Associates Ltd  
Sheppard Industries Ltd  
Shushikai Karate Kan Inc.  
Sid Lane Corporation  
Siddall & Robinson Ltd  
Sidney Cooke Graphics (N.Z.) Ltd  
Sign Arts Ltd  
E. Silestean & Son Ltd  
Silver Birches Accounting  
Simister  
Simms Diesel & Turbocharger Services Ltd  
Sinclairs Hire Plants  
Singing Telegrams  
Skellerup Industries Ltd  
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Slight, B.  
Smaill, R. P.  
Smeele Elco. Ltd  
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Smith, J. A.  
Smith Koppens & Co.  
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Soma-President Textiles Ltd  
Souster, I. R.  
South Canterbury Catchment Board  
South Canterbury Pest Destruction Board  
Southern Chicks Ltd  
Southern Cross Medical Care Society  
Southern Pacific Hotel Corporation  
Southland Pest Destruction Boards Council  
I G & D A Spark Ltd.  
Spar Makers Ltd  
Sportime Mfg Ltd  
Sportscene N.Z. Ltd  
Spray Pot  
Spurway Cooke  
Stack Manufacturing Co. Ltd  
Stanbridge, C. W. N.  
State Services Commission  
Steelmasters Auckland Ltd  
Steelpac Buildings (N.Z.) Ltd  
Stevens Bros. Ltd  
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Stick-on Products Ltd  
Stowers, R.  
Strathallan County Council  
Strawberry Hill  
Stretton & Co.

Stuckey, R. G.  
Sulphur Wells  
Sunray Products Ltd  
Sun Valley Motel  
Sutton, H.  
Synergy Consulting Group Ltd

Tait, Dr. B.  
Takitimu Print  
Tamaki Machine Tool Company Ltd  
Taranaki Electrical Contractors' Assn. Inc.  
Taranaki Newspapers Ltd  
Taranaki Trades Council  
Taranaki Unemployed Workers Rights Centre  
Tarawera Contractors Assn.  
Tasman Forestry Ltd  
Tasman Rental Cars Ltd  
Tasman Wines & Spirits Ltd  
Taubmans  
Taumaranui County Council  
Taumaranui Hospital Board  
Tauranga Liteweight Caravans  
Tauranga & Mt. Maunganui Chamber of Commerce  
Taylor, Mr and Mrs D.  
Taylor, E. W. G.  
Taylor Instrument Ltd  
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Technical Institutes Allied Staff Assn. Inc.  
Te Matai Deer Farm  
Templine Services Ltd  
Te Omanga Hospice  
Terry Docker Joinery Ltd  
Teviot Fruitgrowers Association  
Textile & Garment Manufacturers' Federation  
Theatrelight  
Thermosash Commercial Ltd  
Thode Knife & Saw Ltd  
Thomson, C. D.  
M. R. J. Thompson Construction Ltd  
Thomsons Photo Engravers Ltd  
Tidco International Ltd  
P. L. Tidmarsh Ltd  
Timberlands  
Timber Traders Puketutu Island  
Tisdalls Sports Centre  
Todd & Pollock Builders Ltd  
Tony Sagers Panelbeaters  
Toogee's Hair Design  
Total Mower Services  
Toxins Action Group  
Trade Consultants Ltd  
Trade Tools Ltd  
Transpac Holdings Ltd  
Transport Fuel Systems (N.Z.) Ltd

Treadway & Associates  
The Treasury  
Trigon Packaging Systems (N.Z.) Ltd  
Trimax Industries Ltd  
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True Print Commercial Printers Ltd  
Truffles  
Trustee Bank Holdings Ltd  
Tui Co-operative Dairy Co. Ltd  
Turbill, B.  
Turners (Tauranga) Ltd  
Turnwood Industries  
Tyree, E. W.

U.E.B. Industries Ltd  
U.E.B. Packaging  
Ullrich Aluminium Co. Ltd  
Ultra Marine Services Ltd  
Uniform Centre (S.I.) Ltd  
Union Shipping Group Ltd  
United Boilermakers Iron & Steel Shipbuilders of Otago  
United Cleaning Company Ltd  
Universal Homes Ltd  
Universal Shipping Agencies Ltd  
Upjohn N.Z.  
U.S.P. Needham

Vadco Traders  
Valintine Sawmilling Co. Ltd  
Van Kessel, B.  
Van Reenen Electrical Services Ltd  
Vantage Security Windows  
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Vision Wallcoverings Ltd  
Vos and Brijs Shipyards Ltd  
Vosburgh, M.

Wadsco Motorworld  
Wadsworth Heap Ltd  
Waihi Lodge  
Waikato Chamber of Commerce  
Waikato Valley Authority  
Wairoa Electric-Power Board  
Waitaki Catchment Commission and Regional Water Board  
Waitaki Valley Regional Pest Authority  
Waitara Building Supplies (1975) Ltd  
Wakelin, L. F.  
Walker Products  
Wanganui Boats N.Z. Ltd  
Wanganui Chamber of Commerce & Industry Inc.

Wanganui Fruitgrowers Assn. Inc.  
Wardford Mills Ltd  
Wardenburgs  
Waterfront Industry Commission  
Watkins Home & Garden Products Ltd  
Wattie Industries Ltd  
Wayne Wentworth (N.Z.) Ltd  
Websters  
Wella N.Z.  
Wellington Chamber of Commerce  
Wellington Clinical School of Medicine: Department of  
Community Health  
Wellington Clinical School of Medicine: Department of  
Psychological Medicine  
Wellington Master Builders' and Joiners' Assn. Inc.  
Wellington Unions Health and Safety Centre Trust  
Wesley Social Services Trust  
Westbay Real Estate  
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Western Engineering Group Ltd  
Whitehall Associates Ltd  
Whittle, M. J.  
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Whitmore, P.  
Wide World Products Ltd  
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Williams, Dr P.  
Williams, H.  
Williams & Kettle Ltd  
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Williamson, J. B.  
Williamsons Creative Concrete  
Willow Park Motor Hotel  
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Wilson Bros. Ltd  
Winter Design Associates Ltd  
White Star Products Ltd  
Wilson Foods Ltd  
Wilsons Products Christchurch Ltd  
Wingate Instruments Ltd  
Winstone Ltd  
Winstone Industries Ltd  
Wonder Wool Ltd  
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Woodley Textiles Ltd  
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Woodville District Council

Woodward  
Woodway Homes  
Woodyard  
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L.L. Wright Ltd

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Yachtspars N.Z. Ltd  
Young, G.  
Young, I.  
Young, I. W. E.  
Young Brothers Ltd  
YKK N.Z. Ltd  
YWCA of N.Z. Inc.

Zadok Office Furnishings



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