

29 May 2026

By email to: [REDACTED]

Kia ora [REDACTED]

OFFICIAL INFORMATION ACT REQUEST 2026/38

On Monday 4 May you made a request under the Official Information Act 1982 (the OIA) for the following information:

1. *Donation disclosure records*

Please provide the current 2026 records held by the Electoral Commission for political party donations required to be disclosed during the election year.

For each disclosed donation, please provide, where held:

- a. the name of the registered political party;*
- b. the name of the donor as disclosed;*
- c. the amount disclosed;*
- d. the date the donation was received by the party;*
- e. the date the donation was notified to the Electoral Commission;*
- f. the date the donation was published or made publicly available;*
- g. whether the donation was monetary, in-kind, aggregated, or otherwise categorised;*
- h. whether any amended, corrected, or replacement disclosure has been filed.*

2. *Verification and checking process*

Please provide all current policy, guidance, procedure, manuals, checklists, internal instructions, or operational material relied upon by the Electoral Commission when receiving, checking, publishing, or verifying political party donation disclosures.

This includes material addressing:

- a. how the Commission checks whether a donation disclosure is complete;*
- b. how the Commission checks whether disclosure has been made within the required timeframe;*
- c. whether donor identity is verified;*
- d. whether related entities, companies, trusts, nominees, directors, intermediaries, or associated persons are checked;*
- e. whether donation splitting, aggregation, bundling, or repeat donations are assessed;*
- f. how in-kind donations are assessed or valued;*
- g. how anonymous donations and protected-disclosure donations are handled;*
- h. what steps are taken where a disclosure appears inaccurate, incomplete, late, or inconsistent.*

3. *Compliance records and enforcement*

For the period 1 January 2026 to the date of this request, please provide:

Electoral Commission
Level 4, 34-42 Manners Street, PO Box 3220, Wellington 6140, New Zealand
Telephone +64 4 495 0030

www.vote.nz | www.elections.nz

- a. the number of donation disclosure compliance issues identified;
 - b. the number of late donation disclosures identified;
 - c. the number of amended or corrected donation disclosures received;
 - d. the number of donation disclosures queried by the Commission;
 - e. the number of matters referred for investigation or enforcement action;
 - f. the number of warnings, compliance notices, referrals, or other formal actions issued;
 - g. any policy or criteria used to decide whether to take enforcement action.
- I am not seeking private personal correspondence unless it records a formal compliance decision, warning, referral, enforcement outcome, or decision not to act.*
4. **Donor influence, conflict, and public confidence risk**
Please provide any current policy, guidance, briefing, review, legal advice summary, operational framework, or decision document addressing whether the Commission considers or records risks involving:
- a. repeated large donations by the same donor to multiple political parties;
 - b. donations from entities linked to regulated industries;
 - c. donations from companies, trusts, nominees, directors, or associated entities;
 - d. donations made close to policy announcements, ministerial meetings, public appointments, procurement decisions, regulatory decisions, or election commitments;
 - e. public perception of donor influence, donor access, or conflict of interest.
- If the Electoral Commission does not assess these matters, please confirm that clearly and identify which agency, if any, is responsible for such oversight.*
5. **Statutory authority and limits**
Please identify the statutory provisions relied upon by the Electoral Commission for:
- a. receiving political party donation disclosures;
 - b. publishing political party donation disclosures;
 - c. checking or verifying donation disclosures;
 - d. requiring correction or further information;
 - e. investigating potential non-compliance;
 - f. referring matters for prosecution or enforcement;
 - g. handling anonymous donations;
 - h. handling protected-disclosure donations;
 - i. dealing with donations made through companies, trusts, nominees, intermediaries, or associated entities.
6. **## 6. Public access and register format**
Please provide any current policy, technical document, briefing, or review explaining:
- a. how political donation information is published;
 - b. whether the public register is machine-readable;
 - c. whether historical donation data can be downloaded in bulk;
 - d. whether the public can search by donor, party, amount, date, related entity, or industry sector;
 - e. whether the Commission has considered improving public access to donation data;
 - f. whether the Commission has received complaints, requests, or recommendations about improving donation transparency.
7. **Narrowing and practical processing**
To avoid unnecessary collation, I am happy for this request to be prioritised in the following order:

1. *current donation disclosure records for 2026;*
2. *current operational guidance, policy, manuals, or checklists;*
3. *compliance and enforcement statistics;*
4. *statutory authority and delegation material;*
5. *formal briefings, reviews, or advice concerning donation transparency or influence risk.*

We are interpreting your request as referring to donations over \$20,000 received by political parties during an election year up to the date of your request. Please find answers to your questions below.

1. *Donation disclosure records*

Please provide the current 2026 records held by the Electoral Commission for political party donations required to be disclosed during the election year.

For each disclosed donation, please provide, where held:

- a. *the name of the registered political party;*
- b. *the name of the donor as disclosed;*
- c. *the amount disclosed;*
- d. *the date the donation was received by the party;*
- e. *the date the donation was notified to the Electoral Commission;*
- f. *the date the donation was published or made publicly available;*
- g. *whether the donation was monetary, in-kind, aggregated, or otherwise categorised;*
- h. *whether any amended, corrected, or replacement disclosure has been filed.*

Registered political parties have to let the Commission know within 20 working days when they get more than \$20,000 from a single donor between 1 January of election year and the day before election day. All returns from parties declaring a donation over \$20,000 are published on our website: [Donations exceeding \\$20,000 | Elections NZ](#).

The web page and the returns disclose the name of the registered party and of the donor, the amount of money donated, the date that the donation was received and the date the return was received by the Commission, and whether the donation was aggregated. The date that the donation return was published on our website is not disclosed, but we aim to upload donation returns as soon as reasonably practicable. Returns of donations over \$20,000, under section 210C, do not have to specify whether the donation was monetary or in-kind, therefore we are refusing this part of your request under section 18(e) of the OIA on the basis that this information does not exist.

Over \$20,000 donations will be included in annual returns filed by parties next year, covering 2026.

At the date of your request, two returns of donations over \$20,000 have been amended by parties:

- NZ First: the party amended the return on 27/01/2026 after being contacted by the donor, Michael G Sullivan, who identified that the donation was from him as an individual rather than from the originally listed trust (Sullivan Family Trust). The original version of the return was received on 26/01/2026. The amended return is published on our website.
- ACT: the Commission contacted the party after a return was received on 13/03/2026 with no unit number in the apartment building listed as the address for the donor, Hamish Edwards. The amended version of the return, received on 16/03/2026, is published on our website.

2. *Verification and checking process*

Please provide all current policy, guidance, procedure, manuals, checklists, internal instructions, or operational material relied upon by the Electoral Commission when receiving, checking, publishing, or verifying political party donation disclosures.

This includes material addressing:

- a. how the Commission checks whether a donation disclosure is complete;*
- b. how the Commission checks whether disclosure has been made within the required timeframe;*
- c. whether donor identity is verified;*
- d. whether related entities, companies, trusts, nominees, directors, intermediaries, or associated persons are checked;*
- e. whether donation splitting, aggregation, bundling, or repeat donations are assessed;*
- f. how in-kind donations are assessed or valued;*
- g. how anonymous donations and protected-disclosure donations are handled;*
- h. what steps are taken where a disclosure appears inaccurate, incomplete, late, or inconsistent.*

Returns of donations exceeding \$20,000 are required to be filed with the Commission under [section 210C](#) of the Electoral Act 1993. A return must be filed within 20 working days of the donation being received by the party secretary (section 210C(6)). It is an offence under section 210D to fail to file a return within the 20 working days. The party is responsible for providing the information on donor identity, company or contributors only as required by the Act. It is an offence under section 210D to file a return under section 210C that is false in any material particular.

A return must be filed with the Commission if the total donation amount received in an election year from a single donor, when aggregated with all previous donations received from the donor, exceeds \$20,000. Every contribution to a donation exceeding \$20,000 must be recorded on the return, including the name of the contributor, their address, and the amount of the contribution. Section 207C requires identification of contributors to donations and it is an offence under section 207D to conceal the identity of a contributor.

Parties are also obligated to retain records necessary to verify returns of party donations under section 210E.

As explained in the response to question 1, returns of donations over \$20,000 do not have to specify whether the donation is monetary or in-kind. The valuation of in-kind donations is the responsibility of the party, which must estimate reasonable market value.

Parties are not allowed to keep anonymous donations of more than \$1,500. If an anonymous donation exceeds that amount, the party must pay the rest of the donation to the Commission, which is then paid to a Crown bank account. Parties are responsible for this process and it is an offence under section 207J to contravene this requirement.

A donation protected from disclosure lets a New Zealand person donate more than \$1,500 to a party anonymously. The donor sends the money to the Commission and we group it together with any other donations protected from disclosure for that party. We send the money to the party at regular intervals without identifying them or any details of the donation. More information is available here: [Donations protected from disclosure | Elections NZ](#).

The Commission has standard checks to ensure a return has been completed in full before it is published for public inspection on the Commission's website. A copy of the Commission's checklist for returns of donations over \$20,000 received during an election year is attached, see **Appendix A**.

Any inconsistency with return forms or with the legislation can trigger a request for clarity or amendment, or a party may instigate an amendment themselves. Whether the Electoral Commission seeks amendment, information or enforcement depends on the circumstances of each case. This is subject, so far as the Electoral Act 1993 provides, to our overall discretion not to refer the case to the Police where there is no public interest or where an error is immaterial.

3. Compliance records and enforcement

For the period 1 January 2026 to the date of this request, please provide:

- a. the number of donation disclosure compliance issues identified;*
- b. the number of late donation disclosures identified;*
- c. the number of amended or corrected donation disclosures received;*
- d. the number of donation disclosures queried by the Commission;*
- e. the number of matters referred for investigation or enforcement action;*
- f. the number of warnings, compliance notices, referrals, or other formal actions issued;*
- g. any policy or criteria used to decide whether to take enforcement action.*

I am not seeking private personal correspondence unless it records a formal compliance decision, warning, referral, enforcement outcome, or decision not to act.

As in the response to question 1, up to the date of your request, we identified one issue relating to a unit number not being included in an address on the return, and a party identified one issue relating to the name of a donor. Both issues were amended. No warnings have been issued and no matters have been referred to the Police. There have been no compliance issues identified beyond what has been described in the response to question 1.

4. Donor influence, conflict, and public confidence risk

Please provide any current policy, guidance, briefing, review, legal advice summary, operational framework, or decision document addressing whether the Commission considers or records risks involving:

- a. repeated large donations by the same donor to multiple political parties;*
- b. donations from entities linked to regulated industries;*
- c. donations from companies, trusts, nominees, directors, or associated entities;*
- d. donations made close to policy announcements, ministerial meetings, public appointments, procurement decisions, regulatory decisions, or election commitments;*
- e. public perception of donor influence, donor access, or conflict of interest.*

If the Electoral Commission does not assess these matters, please confirm that clearly and identify which agency, if any, is responsible for such oversight.

The Electoral Commission must administer the rules in the Electoral Act 1993. The Act does not include provisions addressing or restricting donations to multiple parties, donations from regulated

industries, or any connection between donations and policymaking. Where these matters constitute an offence under other enactments, this may be a matter for law enforcement agencies.

We note that it is an offence under section 207LA for bodies corporate to split a donation in order to conceal the total amount of a donation and avoid the donation's inclusion in a return of party donations.

You may wish to raise these matters with the Justice Select Committee. The Committee conducts an inquiry after each general election and considers changes to electoral law. More information on the Justice Select Committee and future public consultation is available here: [Justice - New Zealand Parliament](#).

5. *Statutory authority and limits*

Please identify the statutory provisions relied upon by the Electoral Commission for:

- a. receiving political party donation disclosures;*
- b. publishing political party donation disclosures;*
- c. checking or verifying donation disclosures;*
- d. requiring correction or further information;*
- e. investigating potential non-compliance;*
- f. referring matters for prosecution or enforcement;*
- g. handling anonymous donations;*
- h. handling protected-disclosure donations;*
- i. dealing with donations made through companies, trusts, nominees, intermediaries, or associated entities.*

The Commission administers the rules in the Electoral Act, which contain rules around political donations. The relevant provisions can be found in Part 6A, Subpart 6: [Electoral Act 1993 | New Zealand Legislation](#).

6. *## 6. Public access and register format*

Please provide any current policy, technical document, briefing, or review explaining:

- a. how political donation information is published;*
- b. whether the public register is machine-readable;*
- c. whether historical donation data can be downloaded in bulk;*
- d. whether the public can search by donor, party, amount, date, related entity, or industry sector;*
- e. whether the Commission has considered improving public access to donation data;*
- f. whether the Commission has received complaints, requests, or recommendations about improving donation transparency.*

The Commission publishes donation returns to our website in accordance with [section 210F](#) of the Electoral Act which requires that the returns be publicly available on the Commission's internet site (free of charge) during the public inspection period. This section requires the returns to be publicly available and does not require a searchable register of returns to be created. We publish a PDF of the return alongside the information referred to in the answer to question 1. Beyond this, we have

not designed specific facility for bulk download or searching. The Commission has not, at this time, made specific decisions about expanding disclosure in this way.

Returns from 2023 are published on our website here: [Donations exceeding \\$20,000 | Elections NZ](#)

From 1 January 2011 to 31 December 2022, registered political parties had to let us know within 10 working days when they got more than \$30,000 from a single donor within a 12-month period. This information is published on our website here: [Donations exceeding \\$30,000 | Elections NZ](#). Prior to 2011, registered political parties had to let us know when they got more than \$20,000 from a single donor within a 12-month period. This information is also available at the page above.

Over the years, we have had a small number of requests for information from people requesting searchable information across years and across returns and involving certain types of donor categories that are not required to be reported. We explain what we can provide and what disclosure is required. Copies of previous OIA requests are available [here](#). Any expansion of what must be disclosed in returns or additional publication requirements or requirements or recommendations about improving donation transparency would be for Parliament to consider.

In the interests of transparency, we release responses to Official Information Act requests every 3 months. We will publish this response with your personal details redacted.

You have the right under section 28(3) of the Act to make a complaint to the Ombudsman if you are not satisfied with the response to your request. Information about how to do this is available at www.ombudsman.parliament.nz or by phoning 0800 802 602.

Yours sincerely



Kristina Temel
Chief Legal Advisor