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From: Internet Service Providers Association of New Zealand [mailto:vpresident@ispanz.org.nz]
Sent: Friday, 14 August 2015 4:07 p.m.
To: IRISsupport@justice.govt.nz
Cc: directors@ispanz.org.nz; jordan@internetcz.net.nz
Subject: ISPANZ submission to the intelligence-and-security-agencies-review

14 August 2015

Ministry of Justice

Re: Intelligence and security agencies review

To the reviewers,

Owing to short time we present points we regard as pressing and salient just in email. We can supply signed copy at a later date if you wish.

The following are the points we submit from Internet Service Providers Association of New Zealand (ISPANZ)

1. Demands from the GCSB for data from ISPs and/or small tech businesses can impact heavily on the time and resources of small and emerging companies.
2. Any situation that calls for personnel with a special security clearance to be available at short notice is problematic for smaller companies.
3. Demands for data from the GCSB or SIS can pose ethical dilemmas for ISPs that give some assurance of privacy to their users. The assumption is repeatedly made by those representing the GCSB that meta-data is an acceptable level of intrusion into individual and company activity and gathering that does not constitute large scale spying. We differ and believe that when gathered en masse this is seriously intrusive.
4. We believe individuals and organisations should be able to continue to use commercial grade encryption for privacy as it is part of the growing ICT economy to have digital signatures and digital privacy and because what individuals communicate is beholden to them if they choose to make it that way.
5. The time allocated for public input to this submission was much too short given the requirements for considered operational and technical input, and we would have thought given the critical role of ISPs that our organisation that we would have been directly canvassed.

Please acknowledge receipt of our submission by reply email.

For ISPANZ, Vice President, Robert Hunt

<http://www.ispanz.org.nz>