



28 April 2004

EMPLOYERS AND MANUFACTURERS ASSOCIATION

SUBMISSION ON

DEFINITION OF MANUFACTURE UNDER CER

Submission

The EMA (Employers and Manufacturers Association) had expressed concern over the use of the ANZSIC definition of Manufacturing in the Interim Rules of Origin under the CER Research Report.

On review of the definitions of manufacture working paper, our concern over the use of the ANZSIC definition remains high.

The alternative of the SAFTA definition with a negative list appears to align best with the court rulings of what manufacturing is, and clearly defines what it is not.

It is important that the beneficial wisdom of court rulings be taken into account when establishing the most appropriate definition and that this be mutually applied by both customs services.

Therefore the EMA supports the use of the SAFTA definition as the most appropriate for use in the Rules of Origin for CER.

Contact Details

Garth Wyllie
Executive Officer
Employers and Manufacturers Association

Post: Private Bag 92-066, Auckland 1030 New Zealand

Telephone: 64-9-3670913
Facsimile: 64-9-3670914

E-mail: garth.wyllie@ema.co.nz