12TH MEETING OF THE SPRFMO COMMISSION

Manta, Ecuador, 29 January to 2 February 2024

COMM 12 – Prop 01.1
Explanatory note on Prop 01 regarding the SPRFMO staff regulations

Secretariat

This paper provides additional explanation and background calculations to support the amendments to the SPRFMO staff regulations proposed in COMM12-Prop01.

The amendments in COMM12-Prop01 are either as a direct result of independent advice obtained on the Staff contracts and associated regulations or are as suggested by the SPRFMO Staff and supported by the Executive Secretary.

Annex 1 contains the letter of advice received in relation to the Staff regulations. This relates to most of the suggested amendments. Explanations associated with the remaining amendments are as follows:

Secretariat Recommendation 1: amend clause 6.1: "*The exchange rate used to calculate the relevant New Zealand dollar amount will be referenced against the UN Operational Rate of Exchange monthly.*"

The UN ICSC publishes its Consolidated Post Adjustment Circular monthly. This circular is the reference source used by the Secretariat for calculating professional salaries and contains the UN Exchange rate, post adjustment multiplier, and the thresholds for certain UN allowances by country. Currently the requirement to only adjust the exchange rate quarterly introduces unnecessary variation into the salaries system and this creates challenges for both staff and budgeting within the Secretariat.

https://icsc.un.org/Home/DataPostAdjustment

Secretariat Recommendation 2: amend clause 7.1: "*Annual leave is cumulative, but at the end of each calendar year, not more than 30 days may be carried over to the following year.*"

The 15-day limit is very constraining and introduces unnecessary stress into the Secretariat. The Secretariat's busiest time of the year is at the end of the calendar year when preparing for the Annual meeting (traditionally held in January or February of the new year). This requirement in combination with the work required to prepare for the annual meeting often means staff are taking leave to avoid its forfeiture and this is only resulting in longer and more stressful working days. The Staff regulations for similar provisions in other RFMOs are:

CCAMLR - No carry over limit. NAFO - 25 day carry over limit. NEAFC - 12 days for the first 4 years (can be increased subject to the Secretary's discretion), no limit thereafter. CCSBT, NPFC, SEAFO and IATTC[1]- all have a 30 day carry over limit. WCPFC - Any carry over requires written approval from the Executive Secretary upto a maximum of 50 days. IOTC - 60 days carry over. UN common salaries system – 60 days carry over.

[1] Leave is specified in hours; additional carry oved can be authorised by the Director; no limit for the Director and deputy.

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Secretariat Recommendation 3: amend clause 8.1: "*Where an employee wishes to contribute to a recognised retirement fund, the Commission shall pay two-thirds of the total contributions to that fund, up to the maximum percentage applying from time to time in the United Nations Secretariat".*

Clause 8.1 only applies to internationally recruited employees. For General services staff the current staff agreement states that "*The Executive Secretary will facilitate the participation in Kiwisaver or an alternate recognised retirement fund and the organisation will contribute two thirds of the staff members total contribution to that fund upto a maximum of 6% of the gross salary*."

The proposed change would allow General services staff to contribute upto 8% of their gross salary to Kiwisaver or an alternative recognised retirement fund with the organisation contributing 16% of total gross salary (these figures are proposed because they are slightly under the UN maximum and because by default the Kiwisaver scheme is setup to accept 2,4,6,8 or 10% of a New Zealanders salary). Under the current staffing this proposal would increase amount SPRFMO contributes to Staff retirement by upto 6% (NZ$ 10,000).

Under the UN common system of salaries: "*General Service staff members are participants in the Pension Fund, on the same conditions and subject to the same regulations as the Professional staff (see section V.C*[2] *above). The pensionable remuneration of General Service staff members is equal to their gross salary plus any pensionable allowances (such as language allowance). The gross salary is established in local currency, but pensionable remuneration and benefits are fixed in United States dollars*.

This (or an equivalent) system (including the maximum rate of contribution) is applied by CCAMLR[3], NEAFC, NPFC, CCSBT, ICCAT, IOTC. WCPFC has a maximum contribution rate of 7.5% of salary while NAFO appears to contribute upto 14% (noting this includes provision for insurances) of the salary.

Note that the Letter of Advice contained in Annex 1 also has commentary on Social security (retirement contributions).

Secretariat Recommendation 4: amend clause 8.2a): "*The Commission shall pay two-thirds of the proven cost of medical insurance cover for employees and their dependants up to the maximum percentage applying from time to time in the United Nations Secretariat".*

Clause 8.2 a) only applies to non-New Zealanders. The proposed change would support all SPRFMO staff who wish to take up this benefit. These types of provisions are not uncommon in large New Zealand organisations and under the UN common salaries system – "*Generally, group health insurance schemes are made available by the organizations to locally recruited staff and their dependants. Some organizations offer locally recruited staff a health insurance scheme identical to that applicable to the Professional category, although often with a larger subsidy. In some duty stations, health insurance schemes have been developed locally taking into account available services and the needs of the staff*".

This (or an equivalent) system is applied by WCPFC (all reasonable costs are covered), CCAMLR, NPFC, IOTC, and CCSBT. ICCAT contributes up to 2.5% of base salary[4].

Note that the Letter of Advice contained in Annex 1 also has commentary on social security (medical insurance cover).

[2] Section VC sets the current rate of contribution to the [UNJSPF] Fund at 23.7 per cent of pensionable remuneration, with two-thirds paid by the organization and one-third by the staff member.
[3] Noting CCAMLR staff members can choose to follow either the UN scheme or the comparable Australian legislation.
[4] Unless the staff member chooses to take part in the Public Social Security System, rather than the Van Breda Retirement Benefit Plan, in this case the Organisation will not contribute to medical insurances.

Secretariat Recommendation 5: amend clause 8.2b): "*The Commission shall pay two-thirds of the proven cost of life and disability insurance cover for employees up to the maximum percentage applying from time to time in the United Nations Secretariat".*

Clause 8.2 b) only applies to internationally recruited employees. The proposed change would support all SPRFMO staff who wish to take up this benefit. Implementing this change would have minimal effects on the cost of this budget item (~1-2k).

This (or a similar) system is applied by CCSBT, IOTC, WCPFC (all staff are covered by the Commission's term life insurance policy which provides cover at 2.5 times the base salary on death), NAFO (noting that provisions for pension plus insurances cannot exceed 14% of base salary), and IATTC (Employees with full-time permanent positions receive a life insurance benefit equivalent to one and one-half (1 ½) of their salary).

Note that the Letter of Advice contained in Annex 1 also has commentary on Social security (life and disability insurance cover).

Secretariat Recommendation 6: amend clause 8.6: "*The employee will be entitled to 16 weeks' paid leave, for both parents, in addition to 10 weeks for the birthing mother, up to six weeks of which may be taken prior to the expected due date of the child".*

This amendment seeks to further align SPRFMO staff regulations with the latest updates to the United Nations common system. The new UN policy was the result of a 2019 working group on parental leave report and subsequent ICSC discussion and recommendations (refer paras 70 to 92 of the Report of the International Civil Service Commission for 2022).

On the 30 December 2022 the UN General Assembly welcomed the establishment of the new parental leave framework and requested the Secretary-General to implement the framework in the Secretariat of the United Nations within existing resources, on an exceptional basis, for the year 2023, and encourages executive heads of other organizations of the common system to follow such practice.

The new parental leave policy provides extended paid time off to parents, regardless of gender, as they welcome a child into their lives. At its 2022 summer session, the Commission decided to: a) replace the current maternity, paternity and adoption leave provisions with a parental leave provision of 16 weeks for all parents; and b) provide an additional period of 10 weeks to birth mothers to meet the specific pre- and post-natal needs.

The goal is to invest in family-friendly policies that benefit both organizations and families, as these policies ensure that staff with child-care responsibilities are supported and valued. Considering that parental leave entitlements are an important part of a compensation package that helps organizations attract and retain the best talent, it was crucial for the United Nations common system to formally adopt the best practices, as an employer of choice.

It is envisaged that the new policy will allow women to have more equitable career opportunities with men because they are not forced to suspend or abandon their careers to provide childcare. Moreover, if men are also provided a significant length of paid time off in the form of parental leave, they are more likely to take on shared parenting responsibilities, thus relieving some of the heavy load of infant caregiving that women have traditionally carried on their own.

In the broader context of the Sustainable Development goals and in the long term, an enhanced parental leave will not only serve the staff members and organizations but will also generally contribute to the improvement of public health by allowing parents to care for their children and themselves, reducing the likelihood of physical illness and improving mental health. The enhancement of the current provisions further demonstrates the values of the United Nations common system.

Secretariat Recommendation 7: amend clause 8.8: "*Employees shall be entitled to bereavement leave upon the death of a family member or relative or the end of the employee's pregnancy or the pregnancy of the employee's spouse, partner, or of a person specified in the Holidays Act 2003 due to miscarriage or stillbirth, up to a maximum of 3 days per bereavement (Reasonable travel time to and from destination will not be counted under these limits)".*

It is an unfortunate fact that New Zealand is a remote land, and overseas travel can often take between 1 and 3 days to reach a destination. The suggested amendment above (in parathesis) will add utility to a rarely used but important part of the staff regulations.

RFMOs with similar provisions include IATTC (*If attendance requires travel, then additional time may be given at the discretion of the Director),* NPFC (*Reasonable travel time to and from destination will not be counted under these limits*), WCPFC (*plus minimal traveling time for all staff members whether they have to travel outside or within Federated States of Micronesia*).

Secretariat Recommendation 8: Create a new clause 8.13: "*Internationally recruited employees shall be entitled to a rental subsidy consistent with the UN common system of salaries, allowances and benefits*".

Housing issues in New Zealand were raised by SPRFMO staff in 2022 (refer FAC10-Doc14). According to Trade Me figures year-on-year to September, the capital's median weekly rent rose 6.7% to $640 for a house[5] (this is on top of the 7.5% increase recorded at the same time last year).

This amendment would align SPRFMO staff regulations with the UN common system of salaries, but another option would be to align with existing polices in other RFMOs (refer table below). RFMOs which do subsidise rent include CCAMLR, CCSBT, IOTC, NPFC and WCPFC. CCAMLR, CCSBT and IOTC apply the UN common system.

NPFC subsidises up to 75% of actual accommodation expenses (to a cap of 240,000 JPY/mth). WCPFC provides housing assistance of 75% of the typical rent payable in Federated States of Micronesia (in cases where staff are not occupying Commission provided housing).

The rental subsidy is an integral part of the UN post adjustment system and was designed to ensure equal treatment of staff as regards housing costs incurred when serving in various duty stations. In the UN common system, a rental subsidy may be paid when a staff member's rent exceeds a defined rental threshold (this threshold is a percentage of net remuneration and varies by station as a result lower income staff living in high rental areas are more likely to reach the threshold).

At field duty stations, the subsidy is 80 per cent of the excess of the staff member's actual rent over the rental threshold, in most cases up to a certain limit. At headquarters duty stations, the subsidy starts at 80 per cent of the difference for the first four years, and is reduced to 60 per cent, 40 per cent and 20 per cent, respectively, for the next three years, after which it is discontinued. Normally, subsidies do not exceed 40 per cent of the rent; however, in a few field duty stations where residential rents are excessively high, this limit may be waived.

[5] https://www.thepost.co.nz/nz-news/350094423/wellington-rents-continue-track-upwards

An example of monthly cost for implementing this subsidy using estimated figures is:

			Rental subsidy options NZ$ / month			
Staff position	Years in position	Estimated rent per month (NZ$)	UN Duty station[6]	UN Headquarters[6]	NPFC equivalent	WCPFC equivalent[7]
Executive Secretary	1	4,000	Nil	Nil	2,640	1,838
Compliance Manager	3	3,475	Nil	Nil	2,606	1,838
Data Manager	1	3,850	300	300	2,640	1,838
Communications and Coordination officer	10	3,735	500	Nil	2,640	1,838

[6] https://info.undp.org/gssu/onlinetools/RentalSubsidy/RentalSubsidy.aspxwas used for UN calculations – numbers are based on November 2023 figures.

[7] https://ecoprofile.infometrics.co.nz/wellington%20region/StandardOfLiving/Rent was used to get average rent for Wellington for 2023.

21 November 2023

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RECOMMENDATIONS FOR STAFF REGULATIONS

1 You have asked us to review the Staff Regulations and make recommendations by reference to New Zealand employment law (albeit that SPRFMO is not bound by such laws), and also best practice. You also asked us to:

1.1 review the relevant offer letters and make any necessary suggestions; and

1.2 review the Executive Secretary's assessments on the general services working conditions (**the Working Conditions**) and provide comment on whether those assessments comply with New Zealand employment law and best practice.

2 This letter contains our comments following our review, as well as our recommendations with reasons.

STAFF REGULATIONS

3 Recommendations 1, 7, 9, 10, 14, 15 and 21 reflect standards and entitlements that are owed to employees under New Zealand law and which SPRFMO may wish to consider incorporating into the Staff Regulations. The balance are best practice recommendations that we would generally advise New Zealand employers to consider incorporating into their employment agreements in order to better protect their position or interests.

Regulation 1
<u>Recommendation 1:</u> Remove clause 1.4 "While respecting the principle of non-discrimination, mandatory retirement age is justified as based on objective and reasonable grounds."

4 We recommend removing this provision as compulsory retirement ages are generally prohibited in New Zealand under the Human Rights Act 1993 on the basis that they are considered to be age-based discrimination. There are exceptions for compulsory retirement ages where that can be justified on limited and relatively exceptional grounds such as in certain occupations like judges or pilots. We do not understand that any of those exceptional grounds would apply to the roles within SPRFMO.

Regulation 2

<u>Recommendation 2:</u> Expand clause 2.7 to include the discretion to suspend an employee from duties where the employee undergoes a medical examination but does not consent to their medical report being provided to the Commission, and the discretion to make a decision based on the information available to the Commission.

5 Clause 2.7 permits the Commission to require employees to undergo medical assessments from time to time in order to assess the employee's ability to perform their duties. The current clause provides that where an employee refuses to undergo an assessment then the Commission may make a decision on the employee's ongoing employment and duties despite the lack of any such medical information. However, the clause does not address the risk that the employee undergoes the assessment but refuses to provide the report to the Commission, or what interim steps the Commission might be able to take pending the assessment or the report being provided. Our suggestions are intended to address both of these potential gaps.

<u>Recommendation 3:</u> Remove clause 2.8 which requires employees (other than the Executive Secretary if they are part-way through their four year term) to retire at the age of 65 years.

6 We recommend removing this compulsory retirement clause for the reasons set out in paragraph 3 above.

Regulation 3

<u>Recommendation 4:</u> Expand clause 3.9 to provide that employees may have no other engagements (whether paid or unpaid) other than with the Commission unless the employee obtains prior authorisation.

7 Currently this clause only prevents employees from being employed elsewhere whilst also being employed by SPRFMO. This leaves a potential gap where employees may be conducting other activities in a different capacity, such as a contracted or volunteer capacity. Our edits are designed to address this potential gap by expanding the clause to include any other engagements, whether they may be paid or unpaid. This will ensure employees are required to obtain the Commission's prior authorisation for any and all other activities, irrespective of the structure that may be adopted.

<u>Recommendation 5:</u> Expand clause 3.18 to protect an employee who reports a breach of the Regulation in good faith or who cooperates with an audit or investigation from victimisation.

8 Currently such an employee is only protected from retaliation under the clause 3.18. This change will align this clause with the Protected Disclosures (Protection of Whistleblowers) Act 2022 which prohibits both the victimisation of and retaliation towards whistle-blowers.

Regulation 6

<u>Recommendation 6:</u> Amend clause 6.8(d) to exclude children over the age of eighteen years from the definition of "any other child".

9 As this regulation is intended to only apply to dependent children, we suggest that it may be helpful to introduce an age limit to ensure that there is a clear definition that can be applied to enable consistent of treatment amongst employees.

<u>Recommendation 7:</u> Expand clause 6.8(e) to include any person related by civil union for whose main and continuing support an employee or his or her spouse or partner is legally responsible.

10 Currently this clause only includes, within the definition of "dependant", people who are related to the employee or his/her spouse or partner by blood or marriage. Expanding the definition to also include people who related by either marriage or civil union is consistent with the rest of clause 6.9 (which does refer to civil unions) and also reflects New Zealand employment laws and best practice.

<u>Recommendation 8:</u> Expand clause 6.12 to include that salaries and other benefits compensate employees fully for making themselves available to perform their duties.

11 Currently this clause only states that salaries and other benefits compensate employees fully for the performance of their duties. New Zealand employment law distinguishes between the concept of work and also an employee making themselves available to work. Including both concepts in this clause make it clear that no compensation is available in either situation.

Regulation 7

<u>Recommendation 9:</u> Expand clause 7.1 to include the consequence of an employee having more than 15 days of annual leave at the end of a calendar year. We suggest the balance is either forfeited, paid out, or the employee is required to take the leave.

12 Currently this clause states that only 15 days of annual leave may be carried over from one year to the next, but it does not provide for what happens to the difference in any balances greater than 15 days. Our recommendation is that you are clear about how that excess balance is treated. Our suggested wording is on the basis that the excess balance would be forfeited, however you could allow employees to cash out that balance if you prefer.

<u>Recommendation 10:</u> Expand clause 7.11 to include the Matariki public holiday and change Queen's Birthday to King's Birthday.

13 This recommended change is to ensure that this provision is updated for current New Zealand law, which has been recently amended to recognise England's change of monarch and to introduce Matariki as a new public holiday.

Regulation 8

<u>Recommendation 11:</u> Amend clause 8.3 to substitute the word "paid" for the word "calculated" to be more precise about what obligations are intended to be imported from the Holidays Act 2003.

14 We recommend this minor wording change to be more specific about the obligation you are importing from the Holidays Act.

<u>Recommendation 12:</u> Expand clause 8.4 so that employees are not granted paid sick leave for a period of three or more consecutive days without producing a medical certificate, whether or not those days are working days.

15 The clause as worded is currently unclear as to whether the 3 consecutive days has to be working days or whether it could, for example, include the weekend. Our recommendation is to align this with New Zealand employment law provisions and also best practice by expressly stating that the days do not need to be working days.

<u>Recommendation 13:</u> Amend clause 8.4 to remove the rule that employees are not granted paid sick leave for more than a total of 7 working days in any calendar year without producing a medical certificate.

16 In our experience, this clause is unusual and does not reflect New Zealand law requirements. If the concern is to ensure protection against employees who may be taking excessive sick leave, or who may be using sick leave for reasons that are not genuine, then an alternative option is to require a medical certificate in circumstances where the Commission has reasonable grounds to suspect that the sick leave is not genuine. This alternative option reflects the position under the Holidays Act prior to changes by the Labour government in 2018 and is still a commonly used clause within New Zealand employment agreements.

<u>Recommendation 14:</u> Expand clause 8.8 to entitle employees to bereavement leave at the end of their pregnancy or the pregnancy of their spouse, partner, or of a person specified in the Holidays Act 2003 due to miscarriage or stillbirth.

17 In March 2021, the Holidays Act was amended to extend bereavement leave to miscarriages and stillbirths. This recommendation is therefore to align the circumstances in which an employee is entitled to bereavement leave with New Zealand legislative entitlements.

<u>Recommendation 15:</u> Expand clause 8.8 to entitle employees to one days' bereavement leave when the Commission or otherwise accepts that the employee has suffered a bereavement.

18 This benefit is provided for in the Holidays Act and so our recommended change is to align this clause with New Zealand statutory benefits.

Regulation 10

<u>Recommendation 16:</u> Expand clause 10.1 to include the discretion to pay in lieu of notice where an employee resigns.

19 Clause 10.3 enables the Commission to pay in lieu of notice where the Commission has issued notice of termination. However, that same ability to pay in lieu of notice is not provided for under clause 10.1, which applies where the employee gives notice. We recommend including the ability to pay in lieu of notice in both scenarios, which also reflects the position under most New Zealand employment agreements.

Recommendation 17: Expand clause 10.3 to include the discretion to pay out some of the notice period where the Commission gives notice.

20 As currently worded, clause 10.3 only provides the Commission with the discretion to pay out the entire notice period. That does not provide for situations where the Commission may wish for an employee to continue working for an extra few days or weeks to finish a project, but not the entire three month notice period. We recommend amending this clause to clearly state that some or all of the notice period may be paid in lieu.

Recommendation 18: Expand clause 10.4 to include serious breaches of confidentiality as a ground for summary termination.

21 Currently only intentional breaches of confidentiality constitute grounds for summary termination under clause 10.4. Our recommendation is that the clause is expanded to also cover situations where the breach of confidentiality may not be intentional, but which may be extremely serious.

Recommendation 19: Include a positive obligation to return property at the end of employment.

22 In our view, it is best practice to include a positive obligation to return property at the end of employment, and to have final pay being conditional on that property being returned. We have recommended a specific clause providing for this to be included in Regulation 10.

Recommendation 20: Expand clause 10.9(d) to include the failure to return property as a ground for the cancellation or reduction of the employee's right to repatriation expenses.

23 Clause 10.9 sets out a number of scenarios in which the Commission Chairperson has the right to cancel or reduce repatriation expenses. We recommend that those scenarios are expanded to include a situation where an employee has failed to return company property still in their possession. This will align it with best practice in New Zealand and also our Recommendation 19 above.

Regulation 12

Recommendation 21: Amend clause 12.2 to require employees to take all reasonably practicable steps to ensure their own safety at work and that no action, or inaction of the employee while at work causes harm to any other person.

24 We recommend amending clause 12.2 so that it aligns with the employees' statutory obligation under the Health and Safety at Work Act 2015 which is to take *all* reasonably practicable steps.

OFFER LETTERS

25 We have provided you with marked-up versions of both the professional category offer letter and the offer letter for general staff.

26 Our suggestions for the professional offer letter were relatively minor and largely compromised suggested tweaks to the wording for readability, correcting some minor errors and providing for a clear acknowledgement of the Commission's reliance on the employee's representations.

27 We have recommended using the professional category offer letter as a base for general category staff and prepared a fresh offer letter for your review on that basis. Our reason for this was that, in our view, the format and approach used in the professional category offer letter was clearer and more comprehensive. We also saw no need to adopt two different forms for the two differing categories of staff.

THE EXECUTIVE SECRETARY'S RECOMMENDATIONS

28 Our comments on the Executive Secretary's assessments on the Working Conditions are set out below.

New Zealand income tax and staff assessment

29 We agree with the Executive Secretary that the Working Conditions should not state that the position is exempt from New Zealand income tax. Article 14(5) of the Headquarters Agreement states that Secretariat staff members are exempt from income tax unless they are:

29.1 a New Zealand resident for tax purposes and a New Zealand citizen; or

29.2 a New Zealand resident for tax purposes who has not become resident solely by reason of performing his or her duties for the Organisation.

30 The current wording is incorrect given Article 14(5), and the fact that there currently two Secretariat staff members who pay New Zealand income tax.

31 We agree with the Executive Secretary's assessment that the second sentence of the current wording, that staff assessment deduction will be equivalent to New Zealand PAYE income tax, is inconsistent with the UN system of salaries.

Social security (retirement contributions)

32 The Executive Secretary proposes to change employer retirement contributions to two thirds of the employee's total contribution to KiwiSaver or another recognised retirement fund, up to a maximum employer contribution of 16%.

33 This change would mean employees could elect to contribute up to 8% of their gross salary and receive an employer contribution of up to 16% of their gross salary.

34 This is generous compared to usual practice in New Zealand. Even though the KiwiSaver Act 2006 allows increased employer contributions it is rare for an employer to elect to contribute more than the required 3%.

Inflation rate adjustment

35 We agree with the Executive Secretary's assessment that, given there is no specific public sector wage inflation rate, it would be sensible to change that reference to Statistics New Zealand's labour cost index, adjusted on a quarterly basis.

Social security (life and disability insurance cover)

36 The Executive Secretary proposes to offer discounted life and disability insurance to staff in the general services category. This benefit is already provided to professional services staff.

37 We agree that currently the Staff Regulations do not provide life and disability insurance cover for staff in the general services category.

38 If this benefit is going to be extended to staff in the general services category we recommend that the Staff Regulations and the Working Conditions are amended to make this clear.

Social security (medical insurance cover)

39 The Executive Secretary supports the proposal to amend the Staff Regulations to provide a level of medical insurance cover to both professional and general services staff.

40 It is not uncommon for large New Zealand organisations to provide medical insurance to employees by either:

40.1 paying for them to have access to discounted medical insurance packages; or

40.2 paying for their medical insurance to a certain level of cover as a benefit.

41 If this benefit is going to be provided to general and/or professional staff we recommend that the Staff Regulations and the Working Conditions are amended to make this clear.

Yours sincerely

Marie Wisker
Partner