

Department for Business and Trade

28 July 2026

Paid appointment with the New Zealand Ministry of Foreign Affairs and Trade (New Zealand Ministry of Foreign Affairs and Trade): Application under the Business Appointment Rules from Sir Crawford Falconer KCMG, former Second Permanent Secretary and Chief Trade Negotiation Adviser at the Department for Business and Trade.

Thank you for submitting an application for advice under the Business Appointment Rules (the Rules) to the Civil Service Commission (the Commission) on behalf of **Sir Crawford Falconer KCMG**, former Second Permanent Secretary and Chief Trade Negotiation Adviser at the Department for Business and Trade (DBT). The application is for a paid, part-time role as **Principal Trade Adviser** at the **New Zealand Ministry of Foreign Affairs and Trade (MFAT), Government of New Zealand**. Further detail on the content of the application is in the Annex. The Commission's advice is required as Sir Crawford was a senior civil servant at SCS4 (Second Permanent Secretary). His last day of service was 31 December 2024.

The purpose of the Rules is to protect the integrity of the government. They aim to avoid any reasonable concerns that: a civil servant may be influenced in their official duties by the risk of reward; a civil servant may improperly exploit access to information; and an organisation may gain an improper influence through the employment of a civil servant.

The Commission's advice¹ is that this application with MFAT should be subject to the following conditions:

1. Privileged information - Sir Crawford should not draw on (disclose or use for the benefit of himself or the persons or organisations to which this advice refers) any privileged information available to him from his time in the civil service.
2. Lobbying - For two years from his last day in the civil service, until 31 December 2026, Sir Crawford should not become personally involved in lobbying the UK Government or its arm's length bodies on behalf of the New Zealand Government. He should also not use, directly or indirectly, his contacts in the UK Government and/or the civil service to influence policy,

¹ See [Advice under the Business Appointment Rules](#) for details applying to all advice issued by the Civil Service Commission.

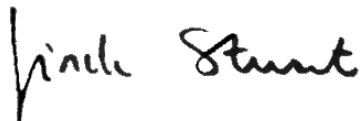
trade mechanisms, or otherwise unfairly advantage the New Zealand Government. This does not preclude engagement conducted strictly on a formal, government-to-government basis through established diplomatic channels.

3. Trade negotiations and commercial strategy - For two years from his last day in the civil service, until 31 December 2026, Sir Crawford should not provide advice to the New Zealand Government or MFAT on the specific, active commercial or transactional elements of the UK-New Zealand bilateral relationship, such as live tariff or market access negotiations. His role must be limited on broad, multilateral international trade architectures and frameworks. Given that this position is within a foreign administration rather than a private sector firm, standard restrictions regarding commercial bids and contracts are not applicable.

The Rules set out that civil servants must abide by the Commission's advice. It is Sir Crawford's personal responsibility to manage the propriety of any appointment and to understand any other rules and regulations he may be subject to in parallel with the Commission's advice.

Sir Crawford must seek advice if he proposes to extend or otherwise change his role with the organisation. Once this appointment has been publicly announced or taken up, the letter will be published on the Civil Service Commission's website.

Yours sincerely,



Gisela Stuart

First Civil Service Commissioner

Annex A: The application

1. The New Zealand Ministry of Foreign Affairs and Trade (MFAT) is the government agency responsible for the conduct of New Zealand's foreign and trade policy. MFAT operates internationally to represent New Zealand's interests, manage bilateral and multilateral trade relationships, and advance international trade diplomacy.

Applicant assessment

2. As Principal Trade Adviser, Sir Crawford stated he will draw on his extensive experience in international trade to provide strategic advice on how existing trade rules in contentious areas can be updated, revised, and extended to deal with modern trade realities. He noted his role will involve prioritising technically feasible options likely to gain support from trading partners and engaging with them to assess reactions and refine these options. He will also deliver training and mentoring to MFAT trade staff and advise senior management on strategic priorities.
3. Sir Crawford clarified that the position does not cover any line-managed operational responsibilities within MFAT and carries no involvement in the "commercial elements" of the UK-New Zealand bilateral relationship, which DBT defined as transactional aspects such as tariff negotiations. Sir Crawford confirmed that any engagement with the UK Government would occur strictly on a government-to-government basis through established diplomatic and official channels, rather than involving the representation of private commercial interests.
4. As Second Permanent Secretary and Chief Trade Negotiation Adviser at DBT (formerly the Department for International Trade) from August 2017 to December 2024, Sir Crawford was responsible for establishing the department to conduct independent trade policy and negotiations. His duties included overseeing the training of negotiation teams and managing the implementation of the UK's new trade policy priorities.
5. Sir Crawford confirmed that he has been out of government service for 18 months and does not have access to live, unannounced policy developments that would confer an unfair advantage. He highlighted that the details of the trade agreements he previously worked on are historic, long published, and entirely within the public domain, with his new responsibilities being strictly forward-looking. Furthermore, he notes that he brings a long-standing professional history within the New Zealand civil service prior to taking up his post in London.

Departmental assessment

6. DBT and the Cabinet Office assessed the risk of this appointment being a reward for past favours as low. DBT confirmed that while Sir Crawford engaged with MFAT counterparts as part of the negotiations for the UK-New Zealand Free Trade Agreement (FTA) and the UK's accession to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP), these major initiatives are historic. The UK-NZ FTA was concluded in February 2022, and CPTPP accession occurred in July 2023, meaning all core details are long published and fully within the public domain.
7. DBT provided context regarding the rigorous, multi-layered governance of those trade agreements to demonstrate that Sir Crawford had no undue singular influence. As an official, his role was strictly bound by a collectively agreed mandate controlled by the Cabinet Office and No. 10. Crucially, all definitive decisions on high-level, controversial items, such as agricultural market access, were made directly by Ministers following regular updates and briefings, rather than by individual officials. Furthermore, Sir Crawford's personal interaction with MFAT representatives during his UK tenure was limited, averaging no more than four or five times a year.
8. Regarding the applicant's access to sensitive information, DBT confirmed that the global trade context has shifted and evolved considerably since Sir Crawford's departure 18 months ago. Consequently, his insight into the UK government's active trade positions is no longer sufficiently up-to-date to confer an unfair advantage. Additionally, there are very few direct export sectors where the UK and New Zealand act as direct competitors, and any overlapping interests are historic and already publicly understood.
9. Regarding the risk of improper influence and lobbying, DBT noted that any potential contact between Sir Crawford and the UK Government would be conducted strictly on a formal, government-to-government basis through established diplomatic channels. The department emphasised that his role is restricted to broad international trade architectures and explicitly excludes the transactional commercial elements of the bilateral relationship, such as live tariff negotiations, which are not active areas of discussion. The Cabinet Office assessed the application and recommended that the standard suite of conditions should apply to safeguard the appointment and maintain consistency under the Rules.

The Commission's analysis

10. *Risk of reward.* Sir Crawford's official dealings with MFAT while in office occurred within heavily scrutinised, multi-layered intergovernmental frameworks where final decisions lay entirely with UK Ministers. The relevant trade deals are concluded and subject to Parliamentary oversight. Sir Crawford has an extensive career history working within the New Zealand government system. The Commission therefore considered the risk of this role being a reward for past decisions to be low.
11. *Access to information.* As Second Permanent Secretary, Sir Crawford held an apex role with wide-ranging exposure to UK trade strategies. However, 18 months have elapsed since his last day in service. As international trade policy moves at a rapid pace, the negotiation and broader geopolitical contexts have shifted. The Commission agreed with DBT's assessment that any specific details he possessed are now out of date. The standard privileged information ban sufficiently mitigates any remaining risk.
12. *Improper influence.* The Commission recognised that a former official of Sir Crawford's seniority possesses a highly influential network across the civil service and international bodies. Sir Crawford's proposed role involves broad international trade frameworks - such as the World Trade Organisation and the Comprehensive and Progressive Agreement for Trans-Pacific Partnership rather than bilateral commercial negotiations. Nonetheless, it may attract public scrutiny, given that Sir Crawford previously served as the UK's chief trade negotiator and would now be advising a foreign government. The lobbying restriction ensures he cannot exploit his senior networks to unfairly benefit a foreign government, aligning with precedents set for other senior officials working with allied or Commonwealth administrations.
13. *Trade negotiations and commercial strategy.* Given that Sir Crawford is advising a foreign government rather than a private sector company, the Commission determined that standard bids and contracts ban is not applicable. To mitigate the specific risks associated with his previous seniority as the UK's chief trade negotiator, the Commission has applied a restriction prohibiting advice on active, bilateral commercial trade negotiations between the UK and New Zealand. This is in keeping with his proposed duties.
14. *Waiting period.* As an SCS4 official, Sir Crawford is subject to a three-month waiting period to take up any appointments. This is not applicable as it has been 18 months since he left the civil service.