

29 July 2025

s9(2)(a)

Halo olgeta s9(2)(a)

**RESPONSE TO AN OFFICIAL INFORMATION ACT REQUEST (REF: DOIA002-2025/26)**

On 1 July 2025, you contacted the Ministry for Pacific Peoples (the Ministry) requesting under the Official Information Act 1982 (OIA), information regarding advice or feedback provided by the Ministry to the Ministry for Regulation or the Minister for Regulation on the Regulatory Standards Bill. I have outlined your specific request and my response below.

*Please provide:*

- 1. Any advice, feedback or other information provided by the Ministry for Pacific Peoples to the Ministry for Regulation or the Minister for Regulation on the Regulatory Standards Bill.*
- 2. Any internal emails or messages including teams messages, text messages or messages on any other application relating to the Regulatory Standards Bill.*

I have identified 11 documents that fall within the scope of your request. These documents are itemised in **Appendix 1**.

Please note, some of the information in the requested documents have been withheld under:

- Section 9(2)(h) to maintain legal professional privilege.
- Section 9(2)(a) to protect the privacy of natural persons.

I am satisfied that there are no public interest considerations that render it desirable to make the information withheld under section 9 of the OIA available.

**Auckland**

9 Ronwood Ave, Manukau  
PO Box 97005,  
South Auckland Mail Centre 2240  
P: 09 265 3200

**Wellington National Office**

Level 7, 1 Bowen House  
Wellington, 6011  
PO Box 833, Wellington 6143  
P: 04 473 4493

**Christchurch**

Level 1, BNZ Centre  
120 Hereford St  
Private Bag 4741,  
Christchurch 8011

In line with standard OIA practice, the Ministry proactively publishes some of its responses to OIA requests. As such, this letter may be published on the Ministry's website. Your personal details will be removed, and the Ministry will not publish any information that would identify you or your organisation.

Should you wish to discuss this response with us, please feel free to contact the Ministry at: [uia\\_requests@mpp.govt.nz](mailto:uia_requests@mpp.govt.nz).

If you are dissatisfied with this response, you have the right, under section 28(3) of the OIA, to seek an investigation and review by the Ombudsman. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

Tankyu tumas,



Dr James Greenwell  
**Interim, Deputy Secretary**  
**Policy & Insights**

## Appendix 1 – List of documents

#	DATE	DOCUMENT TITLE	DECISION ON RELEASE
1	23 October 2024	RE: Feedback invited on Regulatory Standards Bill draft discussion document and Cabinet paper	Released in full.
2	6 March 2025	Upcoming consultation on draft Cabinet paper for the Regulatory Standards Bill	Released in full.
3	12 March 2025	Draft Cabinet paper consultation – Regulatory Standards Bill	Some information withheld under s9(2)(h).
4	13 March 2025	Crown Law advice – Draft Cabinet paper consultation – Regulatory Standards Bill	Released in full.
5	18 March 2025	Draft Cabinet consultation – Regulatory Standards Bill	Some information withheld under s9(2)(a).
6	20 March 2025	Draft Cabinet Paper – Regulatory Standards Bill	Some information withheld under s9(2)(h).
7	28 March 2025	Cabinet paper: Policy Approvals for progressing a Regulatory Standards Bill	Some information withheld under s9(2)(h).
8	7 April 2025	Preparing for release of RSB papers	Some information withheld under s9(2)(h).
9	24 April 2025	Update on timing of proposed Regulatory Standards Bill Cabinet paper	Released in full.
10	7 May 2025	Update on Regulatory Standards Bill	Some information withheld under s9(2)(h).
11	12 May 2025	RE: Update on Regulatory Standards Bill	Some information withheld under s9(2)(h).

# 1

**From:** [Vienna Futi](#)  
**To:** [Natalie.Nesbitt@regulation.govt.nz](mailto:Natalie.Nesbitt@regulation.govt.nz)  
**Cc:** [MPP Advice](#)  
**Subject:** IN-CONFIDENCE:RE: Feedback invited on Regulatory Standards Bill draft discussion document and Cabinet paper  
**Date:** Wednesday, 23 October 2024 3:57:52 pm  
**Attachments:** [image001.png](#)

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IN-CONFIDENCE

Malo ni,

Thank you for the opportunity to comment on the draft public consultation document and the accompanying Cabinet paper titled *Approval to consult on a proposed approach to the regulatory standards bill*.

We note the measures proposed will promote consistency across new legislation with novel and set principles while allowing for some exceptions where these can be justified by appropriate Ministers.

We also note a principle relating to the Treaty of Waitangi/Te Tiriti o Waitangi will not be included in the proposed approach and that a preliminary analysis of the proposals has been done from a Treaty of Waitangi perspective. We note that these two matters were identified as significant risks in the RIS, and we are interested in how this will be mitigated.

We would appreciate the inclusion of the Ministry for Pacific Peoples under agencies consulted. Thank you for continuing to engage us in the work. Should you have any further requests for comment please do let us know and continue to use [MPPAdvice@mpp.govt.nz](mailto:MPPAdvice@mpp.govt.nz) email.

---

IN-CONFIDENCE

**IN-CONFIDENCE**

**From:** Natalie Nesbitt <[Natalie.Nesbitt@regulation.govt.nz](mailto:Natalie.Nesbitt@regulation.govt.nz)>  
**Sent:** Wednesday, 16 October 2024 4:25 pm  
**To:** Elisa Eckford <[Elisa.Eckford@regulation.govt.nz](mailto:Elisa.Eckford@regulation.govt.nz)>  
**Cc:** Pip Van Der Scheer <[Pip.VanDerScheer@regulation.govt.nz](mailto:Pip.VanDerScheer@regulation.govt.nz)>  
**Subject:** Feedback invited on Regulatory Standards Bill draft discussion document and Cabinet paper

You don't often get email from [natalie.nesbitt@regulation.govt.nz](mailto:natalie.nesbitt@regulation.govt.nz). [Learn why this is important](#)

Tēnā koutou,

As per my previous email, please find attached for your review and feedback, a draft public consultation document and accompanying draft Cabinet paper which set out a proposal for a Regulatory Standards

Bill. The proposed Regulatory Standards Bill fulfils a coalition agreement commitment between the National Party and ACT to legislate to improve the quality of regulation, ensuring that regulatory decisions are based on principles of good law-making and economic efficiency.

The draft interim RIS and preliminary Treaty Impact Analysis are also attached, for your information. Note that the interim RIS is currently undergoing quality assurance.

**Important note:** The draft Cabinet paper including Annex 2, the interim RIS, and the Treaty Impact Analysis contain legally privileged advice which is confidential, should not be shared, and care should be taken in the handling of these papers to avoid any inadvertent disclosures outside the Crown.

We welcome your feedback on any matters covered in the papers. To support our analysis of the costs and benefits of the proposal, we particularly invite your views on the expected costs to your agency from the proposal, any benefits you see for your agency or regulatory systems, and the nature of those costs and benefits.

There is a change of timing with Ministerial consultation, it will now begin on 22 October.

Please provide any comments to us by **close of Wednesday 23 October**, including both Elisa Eckford (copied above) and me so that we make sure your email is received. Given the tight timeframes, it would be helpful if you could indicate whether you want a departmental comment included and provide the content of such a comment, should we be unable to fully reflect your feedback in the paper.

Ngā mihi  
Natalie

**Natalie Nesbitt**  
**Principal Advisor**  
Policy and Strategy  
[natalie.nesbitt@regulation.govt.nz](mailto:natalie.nesbitt@regulation.govt.nz)



---

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**From:** [Olivia Cross](#)  
**To:** [Olivia Cross](#)  
**Cc:** [Pip Van Der Scheer](#); [Elisa Eckford](#)  
**Subject:** Upcoming consultation on draft Cabinet paper for the Regulatory Standards Bill  
**Date:** Thursday, 6 March 2025 4:09:43 pm  
**Attachments:** [image001.png](#)

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Kia ora koutou

This email is to give you a heads up about the timing for upcoming departmental consultation on the draft Cabinet paper seeking final policy decisions for the proposed Regulatory Standards Bill.

We are intending to circulate the draft paper to agencies by **Wednesday 12 March**. An updated RIS and Treaty Impact Analysis will also be attached for your information. Unfortunately, as we are working to tight timeframes, we will be asking for agency feedback **no later than 5pm Friday 14 March**. This timeframe reflects an intention for ministerial consultation to be undertaken between Thursday 20 March – Friday 28 March.

Given the tight timeframes, we will be hosting a drop-in session, via Teams at **11.30am Thursday 13 March**. This session will provide an opportunity to ask us any questions you might have about the content of the material ahead of written feedback being provided. We will send a meeting invite for this session when we circulate the draft Cabinet paper.

We would also like to give you an early heads up on two specific changes we believe will be of particular interest as you work through the implications for your agency. The bill now proposes that all secondary legislation will automatically be subject to consistency assessment requirements. This differs from the previous approach that would have meant secondary legislation was only included if specified in a notice under the Act. Secondly in addition to the requirement to develop and periodically report on a plan to review existing legislation, the bill now includes a requirement introducing a ten year time limit for all existing legislation to be reviewed.

#### *Previous feedback*

We appreciate that many of your agencies have previously provided feedback prior to public consultation on the proposal with common themes including:

- the general approach, and whether the objectives could be achieved more effectively through strengthening current arrangements
- the financial and resourcing implications for agencies to comply with the proposed new arrangements
- the proposed principles including the absence of a Treaty principle
- the scope of proposed information sharing powers and MfR's oversight role

We considered the broad range of feedback we received from agencies and provided a [briefing](#) to the Minister with our proposed approach to addressing the matters raised.

Following public consultation the Minister has indicated a preference for the Cabinet paper to be drafted on the basis of a substantially similar proposal to the one set out in the [discussion document](#). Given the short timeframe for consultation, we would ask that wherever possible you focus your addition on additional or different feedback you wish to share. Where feedback may be similar to your agency's previous comments, we would be grateful if you could refer back to previous feedback instead of duplicating any comments.

If you have any questions ahead of Wednesday or you are no longer the appropriate contact, please feel free to get in touch.

Ngā mihi

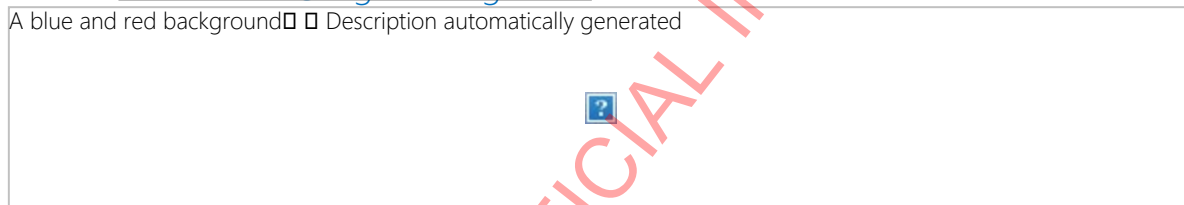
**Olivia Cross** (she/her)

Principal Advisor, Regulatory Management System

**Ministry for Regulation | Te Manatū Waeture**

īmēra: [Olivia.Cross@regulation.govt.nz](mailto:Olivia.Cross@regulation.govt.nz)

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RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

3

**From:** [Olivia Cross](#)  
**To:** [Olivia Cross](#)  
**Cc:** [Elisa Eckford](#); [Pip Van Der Scheer](#)  
**Subject:** Draft Cabinet paper consultation - Regulatory Standards Bill  
**Date:** Wednesday, 12 March 2025 10:30:22 am  
**Attachments:** [image001.png](#)  
[s9\(2\)\(h\)](#)

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IN-CONFIDENCE

Kia ora

Please find attached for your review and feedback a draft Cabinet paper seeking policy approvals for progressing the Regulatory Standards Bill. Also attached:

- a draft copy of key aspects of the Bill is attached. Please note there has been no decisions from Cabinet, the drafting reflects the Minister's intentions to better assist with consultation on the paper.
- the draft RIS and Treaty Impact Analysis for your reference. Both the RIS and TIA are subject to change as we continue to work through our analysis.

We are also expecting Crown Law advice to support departmental consultation. We will circulate this advice as soon as possible but are sending you the Cabinet paper now in the interest of maximising your time with the paper.

**Important note:** the attached papers contain advice that is subject to Crown legal privilege and cannot be shared outside of the core Crown. Please take care in the handling of these papers to avoid any inadvertent disclosures. If you have received this email and are outside the Crown's legal privilege please do not open the attachments and contact us immediately to advise.

#### **Impact on broader public sector agencies**

You will see the proposal now includes all secondary legislation within scope of consistency assessment requirements. Classes of legislation may be excluded from requirements by notice following approval by the House. We appreciate this proposal will have an impact on a broad range of agencies who are empowered to make secondary legislation. We ask in your feedback that you give consideration to the potential impact on entities that fall within your policy areas and/or monitoring functions.

#### **Drop-in session**

Given the tight timeframes we are hosting a drop-in session via Teams at **11.30am**

**Thursday 13 March.** We will provide a short overview of the proposals in the paper and give you an opportunity to ask the team any questions. I will shortly send out an invite to this session, please feel free to forward on within your agency, including to legal colleagues if required. As this session is likely to include discussion on legal aspects of the proposal, please do not forward the invitation beyond your own agency.

### Timing

Unfortunately, as we are working to tight timeframes, we are asking for agency feedback **no later than 5pm Friday 14 March.** This timeframe reflects an intention for ministerial consultation to be undertaken between Thursday 20 March – Friday 28 March. Given the tight timeframes, it would be helpful if you could indicate whether you want a departmental comment included and provide the content of such a comment, should we be unable to fully reflect your feedback in the paper.

Ngā mihi

Olivia

**Olivia Cross** (she/her)

Principal Advisor, Regulatory Management System

**Ministry for Regulation | Te Manatū Waeture**

īmēra: [Olivia.Cross@regulation.govt.nz](mailto:Olivia.Cross@regulation.govt.nz)

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IN-CONFIDENCE

**From:** [Olivia Cross](#)  
**To:** [Elisa Eckford](#); [Pip Van Der Scheer](#); [Jeremy Shoebridge](#); [Olivia Cross](#)  
**Cc:** [jason.varuhas@crownlaw.govt.nz](#); [virginia.hardy@crownlaw.govt.nz](#); [Jason.Gough@crownlaw.govt.nz](#); [Sue.VanDaatselaar@tearawhiti.govt.nz](#); [HORAN, Marian \(PONEKE\)](#); [WALKER Andrew](#); [Paula.Strickson](#); [Richard.Ward@dia.govt.nz](#); [John Sutton](#); [Andrew Fieldsend](#); [mmccconville](#); [risaac@doc.govt.nz](#); [misutton@doc.govt.nz](#); [Liesle.Theron@dpmc.govt.nz](#); [jessica.gorman@dpmc.govt.nz](#); [Sam.Moffett@dpmc.govt.nz](#); [hayden.glass@dpmc.govt.nz](#); [Lisa Oldridge](#); [Jacinta.Dalgety@ero.govt.nz](#); [vs02@nzic.govt.nz](#); [Anna Marley](#); [Brigid.Borlase@ncsc.govt.nz](#); [Paul.Bruere@hud.govt.nz](#); [Claire.leadbetter@hud.govt.nz](#); [Samantha.Aldridge@ird.govt.nz](#); [amoran@linz.govt.nz](#); [Mark.Steel@mbie.govt.nz](#); [Melleny.Black](#); [Kristin Mednis](#); [emily.fabling@mch.govt.nz](#); [Marie.Manaena@mch.govt.nz](#); [James.Gallagher@mfat.govt.nz](#); [Richard.Boud@mfat.govt.nz](#); [Charlotte.Laing@mfat.govt.nz](#); [nicholas.adams@mfe.govt.nz](#); [Tim Bennetts](#); [Becky.Prebble@mfe.govt.nz](#); [Charlotte Wood](#); [Katherine Lay](#); [Sarah Deblock](#); [niripeti.reedy@women.govt.nz](#); [cabinetpapers@women.govt.nz](#); [Cindy.O'Brien@defence.govt.nz](#); [Jan.Breakwell@education.govt.nz](#); [Casey.Pickett@education.govt.nz](#); [richard.joblin@education.govt.nz](#); [Phil.Knipe](#); [maree.roberts](#); [andrew.old@health.govt.nz](#); [simon.medcalf@health.govt.nz](#); [Noyce, Megan](#); [Handley, Georgie](#); [kim.smith@justice.govt.nz](#); [Jordan, Robert](#); [ocu@transport.govt.nz](#); [r.chapman](#); [John Edwards](#); [Maria Mahoni](#); [Jacob Ennis](#); [O.Findlay-Badham@transport.govt.nz](#); [Graeme.Mackenzie](#); [fiona.duncan@mpi.govt.nz](#); [Sarah.Jaggs@mpi.govt.nz](#); [Simon Herbert](#); [MPP Advice](#); [Tuitapuono Milford](#); [Diane.Anderson021@msd.govt.nz](#); [Emma Hughes](#); [vs02@nzic.govt.nz](#); [rachel.groves@ot.govt.nz](#); [nicole.beattie@ot.govt.nz](#); [Andre.Anderson](#); [margaret.mabbett@publicservice.govt.nz](#); [Sheila.Swan@publicservice.govt.nz](#); [rachael.jordan@sfo.govt.nz](#); [aphra.green@sia.govt.nz](#); [Tennille.Maxey@stats.govt.nz](#); [officeoftheqsce@stats.govt.nz](#); [paula.rawiri@tpk.govt.nz](#); [tracey.peters@tpk.govt.nz](#); [bernard.tepaa@tpk.govt.nz](#); [Bev.Murray@tpk.govt.nz](#); [Ramana.Rallapudi@tpk.govt.nz](#); [Ben.Paki@tpk.govt.nz](#); [Ben.Wauchop](#); [Amber.Dickson@treasury.govt.nz](#); [Kate.Williamson@treasury.govt.nz](#); [Jonathan Bass \[TSY\]](#); [kerryn.fowlie@treasury.govt.nz](#); [alison.hill@aroturuki.govt.nz](#); [dawn.wilson@teaho.govt.nz](#); [nicola.hill@teaho.govt.nz](#); [Leila.Tayebi@ethniccommunities.govt.nz](#); [policy@whaikaha.govt.nz](#); [Rima Khorshid \[NEMA\]](#); [Papers2review@tearawhiti.govt.nz](#); [Amy.Smith](#); [ROTH, Tanya](#)

**Subject:** Crown Law advice - Draft Cabinet paper consultation - Regulatory Standards Bill  
**Date:** Thursday, 13 March 2025 11:19:18 am  
**Attachments:** [image001.png](#)

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IN-CONFIDENCE

Good morning

As foreshadowed yesterday please find attached a copy of Crown Law's advice on the RSB.

The advice is subject to Crown legal privilege and cannot be shared outside of the core Crown. Please take care in the handling of the attachment to avoid any inadvertent disclosures. If you have received this email and are outside the Crown's legal privilege please do not open the attachment and contact us immediately to advise.

#### Timing of ministerial consultation

Yesterday we highlighted the intention for ministerial consultation to take place between 20 – 28 March following departmental consultation. We subsequently understand ministerial consultation has been initiated on the basis of the draft paper, but that ministerial consultation will continue next week reflecting any changes resulting from departmental consultation.

Ngā mihi  
Olivia

IN-CONFIDENCE

**From:** Olivia Cross

**Sent:** Wednesday, 12 March 2025 10:29 am

**To:** Olivia Cross <Olivia.Cross@regulation.govt.nz>

**Cc:** Elisa Eckford <Elisa.Eckford@regulation.govt.nz>; Pip Van Der Scheer <Pip.VanDerScheer@regulation.govt.nz>

**Subject:** Draft Cabinet paper consultation - Regulatory Standards Bill

Kia ora

Please find attached for your review and feedback a draft Cabinet paper seeking policy approvals for progressing the Regulatory Standards Bill. Also attached:

- a draft copy of key aspects of the Bill is attached. Please note there has been no decisions from Cabinet, the drafting reflects the Minister's intentions to better assist with consultation on the paper.
- the draft RIS and Treaty Impact Analysis for your reference. Both the RIS and TIA are subject to change as we continue to work through our analysis.

We are also expecting Crown Law advice to support departmental consultation. We will circulate this advice as soon as possible but are sending you the Cabinet paper now in the interest of maximising your time with the paper.

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### **Impact on broader public sector agencies**

You will see the proposal now includes all secondary legislation within scope of consistency assessment requirements. Classes of legislation may be excluded from requirements by notice following approval by the House. We appreciate this proposal will have an impact on a broad range of agencies who are empowered to make secondary legislation. We ask in your feedback that you give consideration to the potential impact on entities that fall within your policy areas and/or monitoring functions.

### **Drop-in session**

Given the tight timeframes we are hosting a drop-in session via Teams at **11.30am**

**Thursday 13 March.** We will provide a short overview of the proposals in the paper and give you an opportunity to ask the team any questions. I will shortly send out an invite to this session, please feel free to forward on within your agency, including to legal colleagues if

required. As this session is likely to include discussion on legal aspects of the proposal, please do not forward the invitation beyond your own agency.

**Timing**

Unfortunately, as we are working to tight timeframes, we are asking for agency feedback **no later than 5pm Friday 14 March**. This timeframe reflects an intention for ministerial consultation to be undertaken between Thursday 20 March – Friday 28 March. Given the tight timeframes, it would be helpful if you could indicate whether you want a departmental comment included and provide the content of such a comment, should we be unable to fully reflect your feedback in the paper.

Ngā mihi  
Olivia

**Olivia Cross** (she/her)  
Principal Advisor, Regulatory Management System  
**Ministry for Regulation | Te Manatū Waeture**  
**īmēra:** [Olivia.Cross@regulation.govt.nz](mailto:Olivia.Cross@regulation.govt.nz)

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**From:** [MPP Advice](#)  
**To:** [Olivia Cross](#)  
**Cc:** [Elisa Eckford](#); [Pip Van Der Scheer](#); [Carl Olive](#); [MPP Advice](#)  
**Subject:** RE: Draft Cabinet paper consultation - Regulatory Standards Bill  
**Date:** Tuesday, 18 March 2025 1:18:43 pm  
**Attachments:** [image002.png](#)  
[image003.png](#)

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IN-CONFIDENCE

Kia ora Olivia,

Apologies for the late response. Thank you for the opportunity to provide further feedback on the draft Cabinet paper – Regulatory Standards Bill. The Ministry has no further feedback on the draft discussion document and Cabinet paper to what was provided on 24 October 2024.

Please continue to include us in any further consultation so the Ministry can respond to any possible impacts on the Ministry or Pacific peoples in Aotearoa.

Ngā mihi,  
Shane

**Shane Simpson**  
**Principal Policy Analyst, Policy and Insights, Ministry for Pacific Peoples**  
**Te Manatū mō ngā Iwi o te Moana-nui-ā-Kiwa**

s9(2)(a)

E [shane.simpson@mpp.govt.nz](mailto:shane.simpson@mpp.govt.nz)

Level 1, 101-103 The Terrace, Wellington  
PO Box 833, Wellington 6140

[www.mpp.govt.nz](http://www.mpp.govt.nz)



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IN-CONFIDENCE

**From:** Olivia Cross <[Olivia.Cross@regulation.govt.nz](mailto:Olivia.Cross@regulation.govt.nz)>  
**Sent:** Wednesday, 12 March 2025 10:29 am  
**To:** Olivia Cross <[Olivia.Cross@regulation.govt.nz](mailto:Olivia.Cross@regulation.govt.nz)>  
**Cc:** Elisa Eckford <[Elisa.Eckford@regulation.govt.nz](mailto:Elisa.Eckford@regulation.govt.nz)>; Pip Van Der Scheer <[Pip.VanDerScheer@regulation.govt.nz](mailto:Pip.VanDerScheer@regulation.govt.nz)>  
**Subject:** Draft Cabinet paper consultation - Regulatory Standards Bill

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Kia ora

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- the draft RIS and Treaty Impact Analysis for your reference. Both the RIS and TIA are subject to change as we continue to work through our analysis.

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#### **Drop-in session**

Given the tight timeframes we are hosting a drop-in session via Teams at **11.30am Thursday 13 March**. We will provide a short overview of the proposals in the paper and give you an opportunity to ask the team any questions. I will shortly send out an invite to this session, please feel free to forward on within your agency, including to legal colleagues if required. As this session is likely to include discussion on legal aspects of the proposal, please do not forward the invitation beyond your own agency.

#### **Timing**

Unfortunately, as we are working to tight timeframes, we are asking for agency feedback **no later than 5pm Friday 14 March**. This timeframe reflects an intention for ministerial

consultation to be undertaken between Thursday 20 March – Friday 28 March. Given the tight timeframes, it would be helpful if you could indicate whether you want a departmental comment included and provide the content of such a comment, should we be unable to fully reflect your feedback in the paper.

Ngā mihi

Olivia

**Olivia Cross** (she/her)

Principal Advisor, Regulatory Management System

**Ministry for Regulation | Te Manatū Waeture**

**īmēra:** [Olivia.Cross@regulation.govt.nz](mailto:Olivia.Cross@regulation.govt.nz)

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IN-CONFIDENCE

RELEASED UNDER THE OFFICIAL INFORMATION ACT REQUEST 1982

6

**From:** [Olivia Cross](#)  
**To:** [Olivia Cross](#)  
**Cc:** [Elisa Eckford](#); [Pip Van Der Scheer](#)  
**Subject:** Draft Cabinet Paper - Regulatory Standards Bill  
**Date:** Thursday, 20 March 2025 12:10:44 pm  
**Attachments:** [image001.png](#)  
s9(2)(h)



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IN-CONFIDENCE

Kia ora koutou

Thank you to everyone for providing feedback on the draft Cabinet paper seeking policy approvals for progressing the Regulatory Standards Bill. We appreciate the level of consideration that went into agency feedback on such a short timeframe. As I'm sure you can imagine we received a significant volume of constructive feedback. We have done our best to summarise in themes and address feedback where we could. I appreciate that there are a lot of documents attached – if you would like a combined version please let me know.

**Important note:** the attached papers contain advice that is subject to Crown legal privilege and cannot be shared outside of the core Crown. Please take care in the handling of these papers to avoid any inadvertent disclosures. If you have received this email and are outside the Crown's legal privilege please do not open the attachments and contact us immediately to advise.

The next steps are for ministerial consultation to begin today with an intention to lodge for Cabinet by 3 April.

If you have any questions, please don't hesitate to get in touch and thank you again for your engagement and quick turnaround on the papers.

Ngā mihi  
Olivia

**Olivia Cross** (she/her)  
Principal Advisor, Regulatory Management System  
**Ministry for Regulation | Te Manatū Waeture**  
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**From:** [Olivia Cross](#)  
**To:** [Olivia Cross](#)  
**Cc:** [Elisa Eckford](#); [Pip Van Der Scheer](#)  
**Subject:** Cabinet paper: Policy Approvals for progressing a Regulatory Standards Bill  
**Date:** Friday, 28 March 2025 12:01:07 pm  
**Attachments:** [image001.png](#)  
s9(2)(h)

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Kia ora koutou

Thank you again for your feedback on the Cabinet paper *Policy Approvals for progressing a Regulatory Standards Bill*. I have now attached the final version of the Cabinet paper. I have not attached all of the appendixes as they are sizeable documents but please let me know if you would like to see any specific ones and I will be happy to send through to you.

We had originally been working to lodge for Cabinet by 3 April, however, please note this timeframe has been moved forward and the paper will now be considered at EXP on 1 April.

As per our previous updates please note Crown legal privilege applies to this paper and it cannot be shared outside of the core Crown. Please take care in handling to avoid any inadvertent disclosures. If you have received this email and are outside the Crown's legal privilege please do not open the attachment and contact us immediately to advise.

Ngā mihi  
Olivia

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**From:** [Olivia Cross](#)  
**To:** [Olivia Cross](#)  
**Cc:** [Elisa Eckford](#); [Silvie Zantza](#); [Pip Van Der Scheer](#)  
**Subject:** Preparing for release of RSB papers  
**Date:** Monday, 7 April 2025 12:47:55 pm  
**Attachments:** [image001.png](#)  
s9(2)(h)

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Kia ora

We are currently working through announcement options and proactive release of relevant documents relating to the proposed Regulatory Standards Bill in anticipation of Cabinet decisions. We will let agencies know when documents have been published.

As you may be aware the Waitangi Tribunal is currently considering a request for an urgent hearing regarding the proposed RSB. We are working on the assumption that most of our documents will need to be provided to the Waitangi Tribunal on a short turn around (i.e some documents will need to be made available within 48 hours of Cabinet decisions). **Please note there is a high bar for any information to be withheld from documents going to the Waitangi Tribunal, therefore we are anticipating it is unlikely any information will be withheld other than for legal privilege. As the Waitangi Tribunal will make information provided to it publicly available, our proactive release is also likely to reflect this approach.** I have reattached the Cabinet paper and departmental feedback appendix so you can see where we are proposing to withhold legally privileged information.

Given the documents we have circulated contain legally privileged information we would encourage you to transfer any OIAs you receive to us (when transfer grounds under the OIA are available) or engage with our ministerial team ([hello@regulation.govt.nz](mailto:hello@regulation.govt.nz)) on any proposed releases.

**Action: If you believe there is any additional information that should be withheld as legally privileged, we ask that you let us know as soon as possible – i.e within the next 24 hours. This is particularly relevant for agencies that have provided a departmental comment in the Cabinet paper.** Apologies for the short timeframe, we are again working to a tight deadline.

Additionally, if there is information (particularly in Appendix 5: Summary of departmental feedback) that you consider should be withheld from proactive release and OIA requests please let us know the grounds and reasons. This will be helpful information for us, however, note the possibility that it may still need to be released through the Waitangi Tribunal

process.

Ngā mihi

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**From:** [Olivia Cross](#)  
**To:** [Olivia Cross](#)  
**Cc:** [Elisa Eckford](#)  
**Subject:** Update on timing of proposed Regulatory Standards Bill Cabinet paper  
**Date:** Thursday, 24 April 2025 2:23:32 pm  
**Attachments:** [image001.png](#)

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Kia ora koutou

This update is to let you know the Cabinet paper *Policy approvals for progressing a Regulatory Standards Bill* will now be considered by Cabinet on 5 May 2025.

There have been a few updates to the paper since you will have seen it last. The main changes are:

- removal of the proposed ten-year deadline for agencies to complete consistency assessments of all legislation (via planned reviews)
- exclusion of some specific types of secondary legislation in the bill
- clarification that the Ministry for Regulation will work with agencies to identify further legislation to be exempted via notice before the relevant parts of the Bill come into effect
- as with the previous proposal, consistency assessment requirements apply to any secondary legislation made or amended after the Bill comes into force (unless that secondary legislation is excluded by the Bill or exempted via a notice). However, consistency assessment requirements would now apply to existing secondary legislation only where a consistency assessment has previously been completed for that secondary legislation when it was made or amended, or where that secondary legislation is brought into the scheme via a notice. This means secondary legislation in force before the bill is passed will not be subject to requirements unless amended or brought into the scheme via a notice

If you would like a copy of the paper, please let me know.

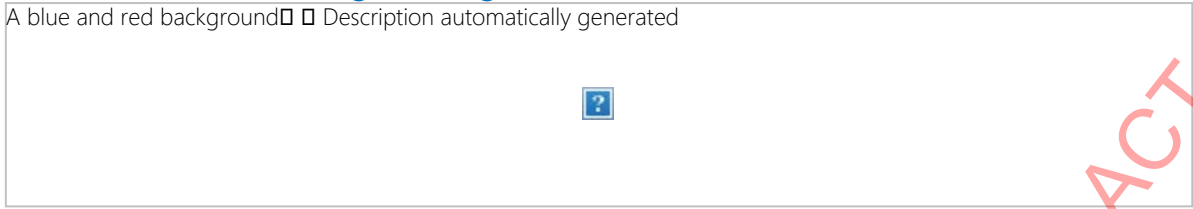
Finally, we are aware we have an increasingly large mailing list for updates on the RSB. If you are no longer your agency's contact, please let me know who the correct contact is and we will update.

Ngā mihi  
Olivia

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**From:** [Olivia Cross](#)  
**To:** [Olivia Cross](#)  
**Cc:** [Elisa Eckford](#); [Pip Van Der Scheer](#)  
**Subject:** Update on Regulatory Standards Bill  
**Date:** Wednesday, 7 May 2025 8:43:53 am  
**Attachments:** [image001.png](#)  
s9(2)(h)

Kia ora koutou

As some of you may be aware *the Policy Approvals for Progressing a Regulatory Standards Bill* Cabinet Paper was agreed by Cabinet on Monday. A copy of the final Cabinet paper and minute are attached. Please let me know if you would like a copy of any of the annexes. Redacted versions of the papers are also available on our website [here](#).

### **Next steps**

Cabinet has agreed that a paper seeking approval to introduce the Bill along with the proposed Bill will proceed directly to Cabinet for consideration on 19 May 2025. This timeframe means we will need to lodge the final paper and draft bill by **next Thursday**.

Our apologies in advance that this timing unfortunately does not leave a window for substantive departmental consultation on the Cabinet paper and draft bill. However, we will look to circulate both as soon as we can next week for your visibility and to support any requests for briefing material you might receive from your respective Ministers' office. This will also provide a window to pick up any factual errors in the drafting but will not be an opportunity for further feedback on policy decisions.

Separately, we will be in touch in the coming weeks to consult with agencies on the development of an initial list of exemptions that could be included in a notice to be issued as soon as the Bill comes into force (see rec 21).

Ngā mihi  
Olivia

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**From:** [Olivia Cross](#)  
**To:** [Olivia Cross](#)  
**Cc:** [Elisa Eckford](#); [Pip Van Der Scheer](#)  
**Subject:** RE: Update on Regulatory Standards Bill  
**Date:** Monday, 12 May 2025 12:41:23 pm  
**Attachments:** [image001.png](#)  
s9(2)(h)

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Kia ora koutou

As mentioned last week we are now working to lodge a Cabinet paper and the draft RSB directly for Cabinet by Thursday 15 May for Cabinet on 19 May. For your visibility we have attached the draft Cabinet paper and bill. Unfortunately, the timeframes do not leave time for substantive feedback on either the Cabinet paper or bill. Again, we apologise for the tight turnarounds.

However, if on review you pick up any factual errors or significant concerns with how the policy decisions made by Cabinet have been given effect to please let us know ASAP and no later than midday tomorrow – 13 May. Please note, depending on the scope of any matters raised, we may not have time to reflect any updates in the drafting.

**Important note:** the Cabinet paper and draft bill contain advice that is subject to Crown legal privilege and cannot be shared outside of the core Crown. Please take care in the handling of these papers to avoid any inadvertent disclosures. If you have received this email and are outside the Crown's legal privilege please do not open the attachments and contact us immediately to advise.

Ngā mihi  
Olivia

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**From:** Olivia Cross <[Olivia.Cross@regulation.govt.nz](mailto:Olivia.Cross@regulation.govt.nz)>  
**Sent:** Wednesday, 7 May 2025 8:43 am  
**To:** Olivia Cross <[Olivia.Cross@regulation.govt.nz](mailto:Olivia.Cross@regulation.govt.nz)>  
**Cc:** Elisa Eckford <[Elisa.Eckford@regulation.govt.nz](mailto:Elisa.Eckford@regulation.govt.nz)>; Pip Van Der Scheer <[Pip.VanDerScheer@regulation.govt.nz](mailto:Pip.VanDerScheer@regulation.govt.nz)>  
**Subject:** Update on Regulatory Standards Bill

Kia ora koutou

As some of you may be aware *the Policy Approvals for Progressing a Regulatory Standards Bill* Cabinet Paper was agreed by Cabinet on Monday. A copy of the final Cabinet paper and minute are attached. Please let me know if you would like a copy of any of the annexes. Redacted versions of the papers are also available on our website [here](#).

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