Key changes to Cabinet's impact analysis requirements from 1 July 2026

Requirement	How is this different?
Agencies must complete a RAS for regulatory proposals *Paragraphs 14–16 of the circular*	The Regulatory Analysis Summary (RAS) replaces the requirement for a Regulatory Impact Statement (RIS). A RAS is a shorter document (no more than 20 pages) that provides a summary of the agency's impact analysis on the regulatory proposal.
Supplementary analysis and post-implementation review *No longer included in the circular*	A supplementary analysis report (SAR) or post-implementation report (PIR) is no longer required when there is a missing or inadequate RAS. However, a condition of general emergency exemptions is that they must have a PIR undertaken one year after the legislation is enacted, unless waived by the Ministry.
Discussion documents *Paragraph 17 of the circular*	The requirements around discussion documents have been streamlined. The decision to release a discussion document does not require an accompanying RAS (or formal quality assurance (QA)) if it includes a range of feasible regulatory options or if it is an issues paper that does not propose solutions or options. Instead, these types of documents can be reviewed through the agency's internal process. As there is no longer a formal QA requirement for discussion documents, agencies will not need to apply for an exemption through RIA Online. Discussion documents that narrow the range of feasible regulatory options still require an interim RAS that needs to be formally assessed against the RAS QA criteria. For more guidance on discussion documents, please see the discussion document guidance note on our website.
Exemptions from a RAS	RAS exemption decisions are being devolved to agencies from 1 July 2026. Exemptions still need to be recorded in RIA Online, but the Ministry of Regulation's (the Ministry's) RIA Team will

Paragraphs 19– 23 of the circular	not be confirming them or reviewing the information in real time. The exemption grounds largely stay the same, and some exemptions will still be subject to conditions. There are four broad categories: • minor or limited impacts exemption • duplication exemption • technical exemption • emergency exemption. Each agency will need to have an internal process for ensuring exemptions are appropriately used – for example the team claiming an exemption should ideally not be the same one confirming the exemption. The Ministry will run a regular audit process to make sure agencies are applying the exemption grounds correctly. Detailed eligibility information is outlined on the Ministry's website, including required processes to obtain exemptions.
RAS template *Paragraph 24 of the circular*	The RAS template replaces the previous RIS template and is a shorter, more accessible document (no longer than 20 pages). The template still includes the foundations of impact analysis with the following key changes: • The cost-benefit analysis (CBA) section has been strengthened to encourage monetisation of the impacts • Distributional analysis has been split out from the main CBA table. • Where there is existing regulation, a deregulatory option should be included in the set of options to analyse the impact of removing it or moving to lighter touch regulation. • The implementation section has been streamlined (see planning for implementation below). For more guidance on using the template, please see the guidance on our website.
Quality assurance of the RAS	The RAS must still be quality assured by an independent QA panel, which applies the QA criteria (see the QA guidance note).

Paragraphs 25– 27 of the circular	All RASs should be logged in RIA Online and have their QA process confirmed by the Ministry. As the RAS is a summary of the analysis with a 20-page limit (including appendices), the QA assessors may ask for additional material (e.g. briefings or reports) to test statements made in the RAS.
Publication of RAS *Paragraphs 30–33 of the circular*	The full text of the RAS must be published on the Ministry's website and the agency's website. Agencies must now establish a RAS website page that hosts or links to all RASs (and supporting information). Guidance on the timing and format of publication is available on the Ministry's website.
Planning for implementation *Paragraphs 34– 36 of the circular*	The number of prompts in the RAS template has been streamlined, and now agencies are primarily asked to outline how the government regulatory proposals could be given effect, provide evidence to decision-makers that implementing this proposal is genuinely feasible, and outline what risks need to be managed and how this will be done. An initial report on the implementation plan can be provided at a high level in the RAS and this can be developed further when the proposal is being considered by the Cabinet Legislative Committee (LEG), including through analysis prepared for a Consistency Accountability Statement (CAS).
Early engagement on potentially significant new regulatory proposals *Paragraphs 12– 13 of the circular*	Agencies will now be required to contact the Ministry as soon as possible after policy work commences on an issue that may result in a significant regulatory proposal being recommended to Cabinet. This is a higher threshold than under the previous circular, which required engagement on all new regulatory proposals. More information is available on the Ministry's website.