



**Ministry for Regulation
Te Manatū Waeture**

Meeting Cabinet's impact analysis requirements

Report 2

March 2026

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Contents

Introduction 3

Proposals missing impact analysis 5

Quality assurance ratings 7

Annex one: Method and limitations 9

Introduction

When a Minister wants to create or change legislation, their agency must first provide Cabinet with analysis of the likely impacts of the regulatory changes being proposed, set out in a Regulatory Impact Statement (RIS).

Completing regulatory impact analysis before taking a proposal to Cabinet ensures Ministers have information on:

- the scope of the regulatory issue that's being addressed, the rationale for government intervention, and the options for addressing it (including non-regulatory options)
- the costs and benefits of each option
- the views of the people who have been consulted on the proposal
- how the regulatory changes could be implemented, monitored and reviewed in the future.

Cabinet's requirements for impact analysis are designed to encourage systematic and evidence-informed policy development, which helps support high quality regulation. They also help ensure Cabinet can make well-informed decisions about the regulatory changes being proposed.

Cabinet's requirements for impact analysis are set out in full in the Cabinet Office circular, CO (24)7: Impact Analysis Requirements.

1. The Ministry for Regulation administers Cabinet's impact analysis requirements

If an agency is preparing a regulatory proposal for Cabinet, the Ministry for Regulation (the Ministry) will confirm:

- whether any aspects of the proposal are eligible for an exemption
- the form the analysis needs to take (e.g. if the proposal contains cost recovery elements, then a separate template may be needed)
- how to complete the quality assurance for the RIS.

To ensure an open and transparent regulatory process, RIS documents are published on the websites of the authoring agency and the Ministry at the same time as, either:

- the relevant bill is introduced to Parliament
- the regulation is gazetted, or
- the material is proactively released.

2. About this report

In late 2024, the Ministry committed to publicly reporting on how well portfolios are meeting Cabinet's impact analysis requirements. This reporting contributes to the objective of ensuring an open and transparent regulatory process.

The first report was published in September 2025, covering the period ending 31 March 2025. This report is the second iteration. It covers the six-month period of Q2 and Q3 2025, from 1 April to 30 September 2025.

The Cabinet Office circular sets out a series of requirements, which are relevant for different scenarios. In line with the first report, we have focused on two key requirements of most regulatory proposals:

1. the requirement to produce a RIS
2. the outcome of the formal quality assessment required for a RIS.

This report assesses how well portfolios met these two requirements across Q2 and Q3 2025 (i.e. 1 April 2025 to 30 September 2025), using the following two metrics:

- the number of proposals that did not have a RIS where one was required
- how many RISs had Quality Assessment ratings of: "meets", "partially meets", "does not meet".

As only a small number of proposals are in scope of this report, we have not commented on any trends or made any comparisons to the data in the previous report. As we continue developing these reports, we will have more data and will aim to comment on any trends we notice.

Limitations are outlined in Annex One.

Proposals missing impact analysis

This section presents data on instances where a regulatory proposal required impact analysis but was considered by Cabinet without it.

1. Not all portfolios had instances of proposals missing a RIS

The figures in this section only include portfolios that had instances where a proposal was considered by Cabinet without a required RIS.

To our knowledge, the following portfolios provided a RIS (where needed) for all proposals considered by Cabinet in the reporting period: Revenue, Health, Climate Change, Commerce and Consumer Affairs, Conservation, Education, Environment, Building and Construction, Forestry, Social Development and Employment, Agriculture, Biosecurity, Internal Affairs, Statistics, Resources, Housing, Regulation, Land Information, Immigration, Emergency Management, Workplace Relations and Safety, Māori Development, Research Science and Innovation, Media and Communications, Hunting and Fishing, Courts, Finance, Police, Tertiary Education, Corrections, Racing.

Most of the portfolios above had five or less proposals considered by Cabinet in the reporting period. However, some moderate volume portfolios feature in the list above, i.e.:

- Revenue, with 10 proposals
- Health, with 9 proposals
- Climate Change, Commerce and Consumer Affairs, Conservation and Education, each with 6 proposals.

2. Proposals missing impact analysis

In Q2 and Q3 2025:

- 105 RISs were produced for Cabinet proposals and came back to the Ministry for publication
- Cabinet considered 9 proposals without the required impact analysis.

Therefore, in Q2 and Q3 2025, 91.4 % of proposals had the required impact analysis.

Figure 1. Count of RISs produced and count of proposals missing impact analysis

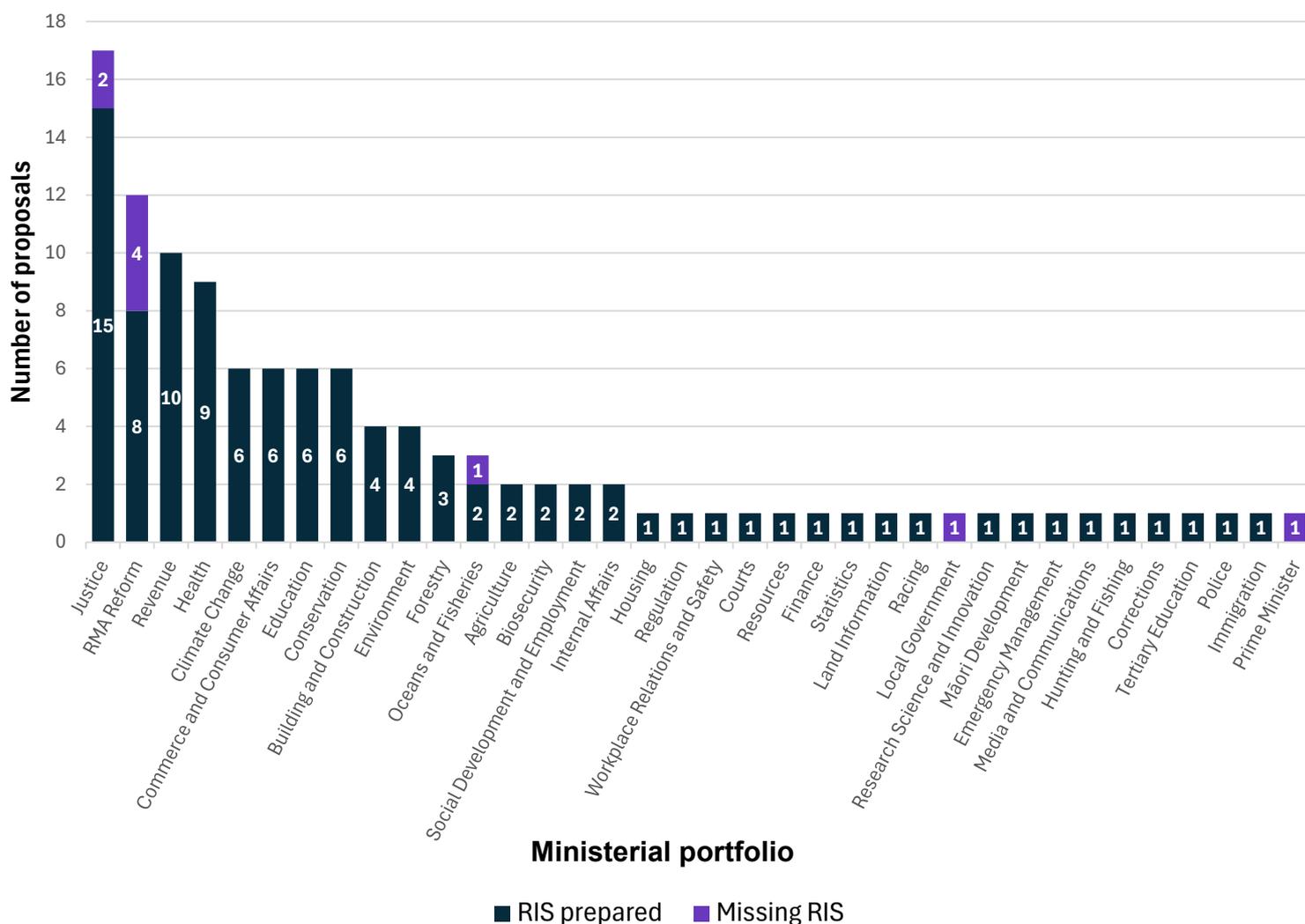


Figure 1 shows for each portfolio, how many proposals requiring a RIS were taken to Cabinet without one, compared to how many RISs were produced and published on our website for that portfolio.¹

This data shows that:

- the volume of proposals varies significantly across portfolios
- most portfolios provided 100% of the required impact analysis to Cabinet across the reporting period
- most missing RISs are concentrated in a small number of portfolios.

This indicates that:

- there is not a clear relationship between the volume of portfolio Cabinet proposals that required a RIS and the rate of missing RISs.

¹ The sum of these two numbers represents the total number of proposals that required a RIS.

Quality Assurance ratings

This section presents data on the Quality Assurance (QA) ratings received by RISs that have requested publication on our website.

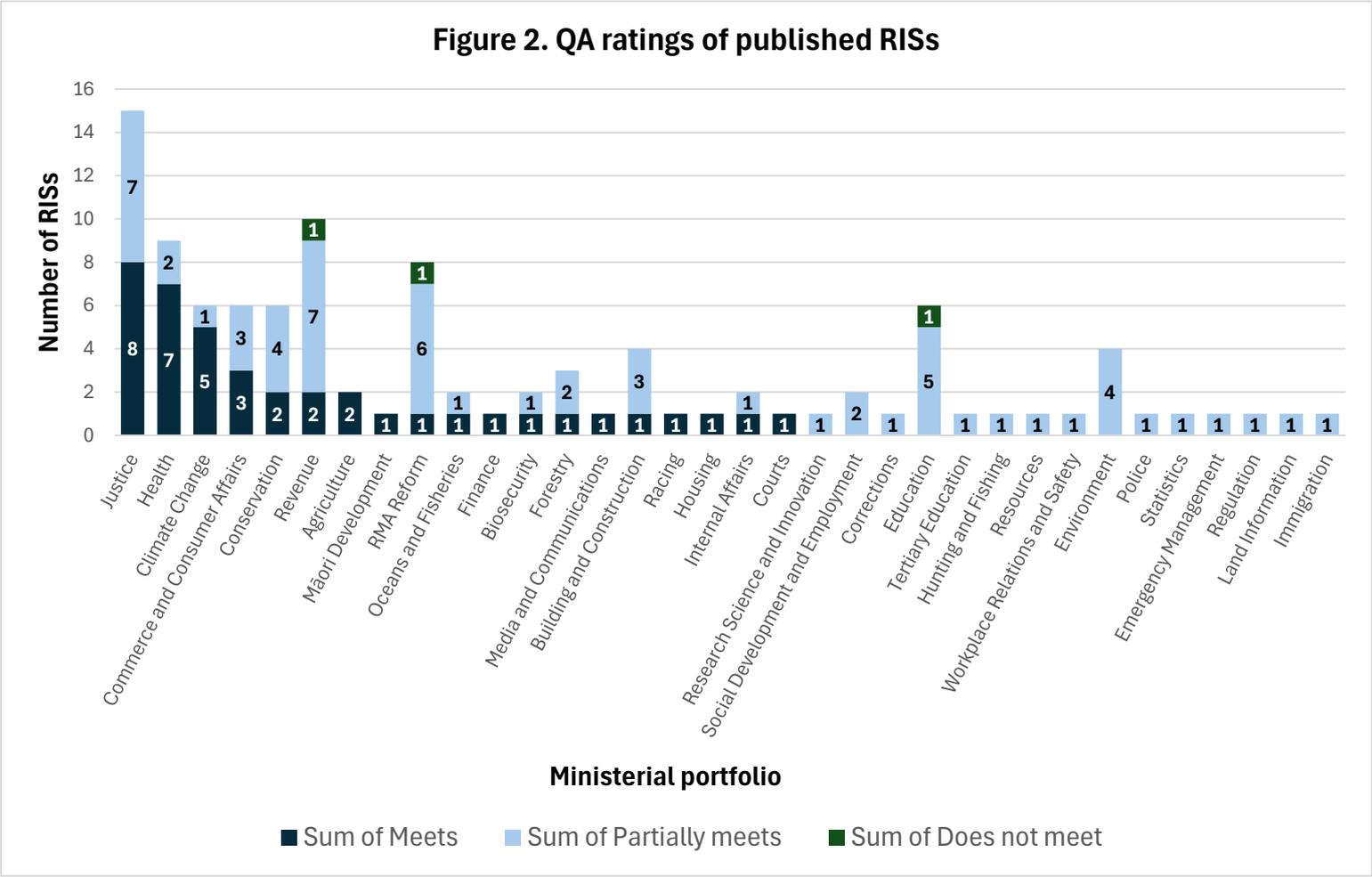
There are three possible ratings that a RIS can receive:

1. **Meets** – meets the quality standard across all dimensions, however there may still be scope for comment on what has been done well and what could have been done better.
2. **Partially meets** – meets the quality standard on most dimensions. A “partially meets” rating means that the RIS is deficient in some areas, against the QA criteria, but the panel consider that the analysis is nonetheless sufficient to inform decisions. A partially meets rating can be thought of like a pass grade with room for improvement.
3. **Does not meet** – the RIS falls short of the standard on more than one dimension, or a key component is inadequate. A ‘does not meet’ rating is effectively a judgement that the RIS does not contain sufficient information and analysis to allow Ministers to make a properly informed decision.

Table 1: Quality Assurance ratings

Timeframe	Meets	Partially meets	Does not meet	Total
2025 – Quarter 2 & 3	41	61	3	105

Figure 2 shows the total number of each QA rating that portfolios received for all RISs they published over Q2 & Q3 2025 period.



The portfolios with the highest proportion of ‘meets’ ratings against their total number of RISs produced (all with 100%) were: Agriculture, Māori Development, Finance, Media and Communications, Racing, Housing, Courts. All of these portfolios only produced one RIS, except for Agriculture, with two RISs.

Of higher volume portfolios, Climate Change, Health and Justice had the highest rates of ‘meets’ ratings, with 83%, 78% and 53% respectively.

Annex one: Method and limitations

This data includes regulatory proposals that the Ministry is aware of and may not reflect every proposal considered by Cabinet.

The number of RISs produced and the QA rating data are gathered when agencies request publication of their RIS on our website. Therefore, for example, RISs which are not yet suitable for publication (e.g. because decisions are still being made, or the Cabinet material has not yet been proactively released) will not be reflected in this data.

To improve the accuracy of our data, we have worked with relevant agencies to identify and mitigate any discrepancies with their records.

These reports reflect a snapshot at the time they are published. This means there are limits to the conclusions that can be drawn by comparing the data in this report to the previous report and caution should be exercised when interpreting the results. As we continue developing these reports, we will have more data and will aim to comment on any trends we notice.

Joint proposals

Joint proposals for Cabinet are reflected in the numbers for all relevant portfolios (e.g. a proposal from Agriculture and Environment would be counted as a proposal in both portfolios).

Restricted proposals

Proposals classified as restricted or sensitive are, for security reasons, not always entered into our system and therefore may not be reflected in our reporting.

Different types of impact analysis

There are several types of impact analysis documents, depending on the stage and type of the proposal. This report uses the term RIS to refer to all impact analysis documents, including:

- Cost Recovery Impact Statements
- Interim Regulatory Impact Statements
- Supplementary Analysis Reports.