Frequently Asked Questions: Regulatory Impact Analysis changes from 1 July 2026

What is expected for a Regulatory Analysis Summary (RAS)?

Overview

The Regulatory Analysis Summary (RAS) is a summary document, rather than a comprehensive record of all analysis.

RASs are expected to be no more than 20 pages. Agencies will be expected to have a strong justification for a departure from this expectation.

Agencies will still be expected to undertake analysis proportionate to the significance of the proposal. Detailed analysis can sit behind the RAS (for example in briefings or working papers) and can be proactively released alongside Cabinet materials, following decisions. Detailed guidance is available on the Ministry's website to support agencies with preparing and quality assuring RASs.

From what date is a RAS expected?

All papers (that include regulatory policy proposals) taken to Cabinet on or after 1 July 2026 will be required to prepare a RAS.

The 20-page limit for RASs

Sections 10 and 11 of the Regulatory Analysis Summary Process Guidance Note cover using the RAS template.

Agencies will be expected to have a strong justification for a departure from the 20-page expectation. While a RAS will provide a summary of analysis to Cabinet, we expect that agencies will undertake appropriately detailed analysis, including providing briefings for Ministerial decisions, to prepare for Cabinet policy approvals. Agencies may wish to proactively release this information, and it will be subject to the Official Information Act 1982. For more information you can read the Cabinet Circular: CO (23) 4: Proactive Release of Cabinet Material: Updated Requirements.

We encourage authors to submit an early draft of their RAS to their QA panel. The assessors may ask to see some of the linked/referenced material and to consider

whether the length of the RAS is proportionate to the significance of the policy problem in their feedback. Detailed guidance is available on the Ministry's website to support agencies with preparing and quality assuring RASs.

What happens to Cabinet decisions made without impact analysis or with a RAS that received a 'does not meet' QA rating?

Section 14 of the Regulatory Analysis Summary Process Guidance Note covers proposals with inadequate impact analysis.

In cases where impact analysis requirements are not met, there will no longer be a requirement for supplementary analysis after Cabinet decisions are made. However, agencies will need to prepare Consistency Accountability Statement (CAS) and Summary of Underpinning Analysis at the point legislation is introduced or made. Those without impact analysis to support their Summary of Underpinning Analysis will be more likely to identify an inconsistency with some of the principles of the Regulatory Standards Act.

Once in place, legislation will also be subject to review as part of the review requirements under the Regulatory Standards Act for existing legislation (so long as the legislation is not excluded from scope of the Act).

We will continue to publicly report on instances where Cabinet considers a proposal without impact analysis.

What constitutes a "deregulatory option" for the purposes of the RAS? Will there be flexibility around including one where there is no feasible deregulatory option (for example because there's no existing regulation)?

This will be context specific. It could include options for lighter-touch regulation or removing regulation entirely. This aligns with our previous advice where impact analysis would demonstrate an agency has considered a range of feasible options (including a non-regulatory option). In situations where a deregulatory option is not relevant, it won't be required (e.g. where there is a proposal to regulate for the first time). In addition, where a deregulatory option is obviously not workable, this can be briefly set out rather than exhaustively analysed.

Does the RIA Team still do process confirmation?

Section 10 of the Regulatory Analysis Summary Process Guidance Note covers confirming a RAS process.

The RIA Team is still responsible for confirming the process requirements for impact analysis, including QA panel arrangements.

What's happening with the cost recovery templates (CRISs)?

We have made some minor updates to the Stage 2 cost recovery impact analysis template (CRIS 2), which is now called a Cost Recovery Analysis Summary (CRAS2) template. We are also working on an equivalent minor update to the CRIS 1 template, which we expect to be available shortly.

The cost recovery templates will undergo a more fundamental review later this year.

How does the exemption process work now that this is being devolved to agencies?

What should agencies put in place for processing exemptions?

Section 8 of the Regulatory Analysis Summary Process Guidance Note covers the exemptions process and grounds.

How will exemption decisions be monitored and/or audited?

The Ministry intends to periodically audit exemptions decisions. We are developing our policy for this and will keep agencies informed.

Do agencies still need to record anything in RIA Online in relation to exemptions?

Agencies will need to record their exemption decision and reasoning in RIA Online.

What do I do if I have aspects of the old RIA system still in progress?

What happens to SARs or PIRs already committed to?

For Supplementary Analysis Reports (SARs) already committed to: if you are preparing draft legislation to be approved by Cabinet Legislation Committee on or after 1 July 2026, and your legislation is subject to CAS requirements, you will not be required to also prepare a SAR. Please contact RMS@regulation.govt.nz to confirm whether this applies to your proposal.

For Post-Implementation Reviews (PIRs) already committed to: you will not be required to prepare a separate post-implementation review if your legislation is included in a plan for review of existing legislation. Please contact RMS@regulation.govt.nz to confirm whether this applies to your proposal.

What are the requirements for discussion documents and interim RASs?

Detailed guidance is available on the Ministry's website to support agencies with preparing discussion documents.

Where a discussion document contains a full range of feasible options (i.e. it does not narrow options under consideration): QA will no longer be formally required. Accordingly, agencies no longer need an exemption for a discussion document to substitute for an interim RAS.

Where a discussion document does narrow options or does not present a range of feasible options: an interim RAS will still be required and will still need to be quality assured. The details will need to be entered in RIA Online for process confirmation.

Agencies should apply internal QA processes for ensuring discussion documents are high quality. Agencies are also encouraged to use the QA criteria for discussion documents (available in the discussion document guidance), although this will be a matter of agency discretion.

How does the RAS and CAS system intersect?

Do CASs replace RIA/RASs?

A Consistency Accountability Statement (CAS) does not replace a RAS. The two documents serve different purposes and are required at different times in the regulatory making process.

A RAS must accompany all policy proposals taken to Cabinet (or two or more Ministers with delegated authority from Cabinet) if they include a government regulatory proposal, unless an exemption applies. An exemption from completing a RAS does not provide an exclusion from requirements under the Regulatory Standards Act 2025.

A CAS must be produced for all proposed legislation (Government bills, material Government amendments, and secondary legislation) unless the legislation is excluded or exempted. CASs must be included in or linked from the explanatory note of the Bill, Government amendment or new secondary legislation.

For more information see the Cabinet Circular CO (26) 2: Expectations for Good Law-making.

If my Cabinet decisions were exempted from the RIA requirements, is my draft legislation also excluded from the CAS requirements?

The exclusions from the requirements of the Regulatory Standards Act 2025 are separate to RIA exemptions. Legislation excluded from CAS requirements are set out in Schedule 2 of the Act or will be contained in the Regulatory Standards (Excluded Legislation) Notice 2026.

Information about the CAS requirements is on the Ministry's website.

You can find out about exemptions from the RIA requirements in section 9 of our Guidance Note on the Regulatory Analysis Summary Process.

Where can I find further guidance and support?

The Ministry has prepared a suite of resources to provide guidance to agencies.

The Ministry ran webinars in June 2026 that covered changes to the RAS template, the new exemptions process, discussion documents, the process for inadequate impact analysis, publication requirements etc. For those within central government, the webinars are available to view through the RIA Online training page (you will need access to RIA Online first).

The Ministry also presented at a Policy Project webinar on the changes in May 2026, which you can watch here.

Revised guidance material is available on the Ministry's website. This includes best practice guidance, guidance on the RAS process, quality assurance, discussion documents, publication requirements, and information on cost benefit analysis.

The Cabinet Circular is available to read on the DPMC website.