



Key changes to Cabinet’s impact analysis requirements in Cabinet Office circular CO (24) 7

Requirement	How is this different?
Coversheet at the front of the new RIS template.	<p>The new RIS template has an “at-a-glance” coversheet so Ministers can glean key information about the impact analysis. This needs to accompany all RISs going to Cabinet and should be no more than 4 pages long.</p> <p>If your RIS is complex (e.g. has multiple parts dealing with different policy proposals) please contact the RIA Team for guidance.</p>
Noting recommendation in Cabinet paper on whether impact analysis requirements have been met.	<p>All Cabinet papers that require impact analysis must now include a recommendation that notes whether the requirements are met.</p> <p>A recommendation will be added to the Cabinet paper template for authors to insert in their papers.</p>
Cabinet papers being circulated for Ministerial consultation need to be accompanied by a draft RIS. <i>Paragraph 13 of the circular</i>	<p>A draft RIS (or other RIA document) must accompany Cabinet papers during Ministerial consultation. See FAQs below for more information.</p> <p>We strongly recommend that a draft RIS is also circulated for agency consultation.</p>
Early engagement with the Ministry for Regulation (the Ministry) when developing new regulatory proposals. <i>Paragraphs 17 – 21 of the circular</i>	<p>Agencies must contact the Ministry as soon as possible after work begins on an issue that may result in a Cabinet regulatory proposal. You can do this by filling out the early engagement form available on our website.</p> <p>This requirement will enable us to better support agencies at the start of policy development – clarifying the problem definition, checking that all feasible (including non-regulatory) options are being considered, and understanding agencies’ timeframes for consulting, analysing and testing conclusions. Our level of engagement will be guided by the underlying risks and likely impacts.</p>
Discussion documents that substitute for a RIS will be assessed against new criteria. <i>Paragraphs 26 – 28 of the circular</i>	<p>Previously, discussion documents substituting for an interim RIS were assessed against QA criteria which were similar to those for RIS documents. The revised criteria enable an assessment of whether the discussion document supports effective consultation and enables future impact analysis. See our Guidance Note for Discussion Documents.</p> <p>Some discussion documents will still require a separate interim RIS to supplement analysis. These interim RISs are still assessed against the main QA criteria.</p>



<p>Technical exemptions no longer require confirmation by the Ministry for Regulation.</p> <p><i>Paragraphs 29 – 31 of the circular</i></p>	<p>The RIA Team administers the RIA requirements through RIA Online, including granting exemptions on various grounds. Previously, all exemptions were granted by the RIA Team. The new circular enables some technical exemptions to be self-claimed. Read our Guidance Note on Cabinet’s Impact Analysis Requirements for the specific grounds or email the RIA team if you need advice.</p>
<p>New exemption grounds for proposals with limited impacts.</p> <p><i>Paragraph 36 of the circular</i></p>	<p>The new limited impacts exemption is given where a proposal is expected to have more than minor impacts, but those impacts are limited (e.g. in scope and type), and impacts are easy to assess. This is expected to increase the threshold for granting exemptions.</p> <p>We recommend you get in touch with the RIA team early if you are unsure if your proposal could be exempt or partially exempt under this new threshold.</p>
<p>The Ministry will publicly report on how well each portfolio is meeting its impact analysis responsibilities.</p> <p><i>Paragraphs 54 – 55 of the circular</i></p>	<p>The Ministry will record instances of papers with inadequate impact analysis and will publicly report on how well each Ministerial portfolio is meeting its impact analysis responsibilities. We will engage with agencies to develop the reports.</p>



FAQs about the new impact analysis circular

Timing of changes

When do these changes apply?

The updated Impact Analysis Requirements set out in the circular apply from 1 January 2025. However, any proposal which has had its arrangements confirmed with the Ministry for Regulation prior to 1 January 2025 can continue under the old requirements and templates if the proposal is submitted to Cabinet by 31 March 2025

Exemption grounds

What does the new “limited impacts” exemption mean for my policy process?

The new limited impacts exemption is expected to make it easier to get exemptions for proposals that were in a ‘grey area’ prior to the new circular – ie if the proposal was likely to have more than minor impacts, but those impacts were easy to identify assess and limited in scope or type.

There is more information available in our [‘Guide to Cabinet’s Impact Analysis Requirements’](#). As we grant increasing numbers of these limited impacts exemptions over time, we will revise and expand our guidance to provide further information on when this exemption ground applies.

Do I need to provide a separate interim RIS if my discussion document narrows options for consultation, even if a full range of options will be considered later by Cabinet?

In most cases, if a discussion document explicitly or implicitly narrows the range of regulatory options being considered, a separate interim RIS must be prepared to supplement analysis. However, in marginal cases where options are not explicitly narrowed, the need for a separate RIS may be avoided if the responsible Minister and agency include in the Cabinet paper and the discussion document an explicit statement indicating the discussion document is not intended to narrow the range of options, and that a full analysis will be undertaken further along the policy development stage when a full RIS is prepared.

Engagement with the Ministry for Regulation

At what points during the policy development process do agencies need to engage with the Ministry?

At the very beginning of the policy development process, agencies must now fill in the [early engagement form](#) on our website with a brief description of the proposal and likely impacts.

Once more details have been established (such as the problem definition and range of options), agencies should enter their proposal to [RIA Online](#) to confirm with the RIA Team the RIA requirements apply to the proposal, which RIA document is applicable, and QA arrangements.

When the draft Cabinet paper and accompanying draft RIS has been developed, agencies can include the Ministry for agency consultation via this email: agencyconsultation@regulation.govt.nz.



Once the proposal has been considered by Cabinet and ready for publication, agencies need to complete the publication tab on RIA Online so that it can also be published on the [Ministry's website](#).

Ministerial and agency consultation

Do I need to provide a final RIS with a QA rating for Ministerial consultation?

The requirement in the circular only states that a draft RIS (or other RIA document) must accompany Cabinet papers during Ministerial consultation. This means that it is up to agencies how they want to manage the process and what they are comfortable circulating.

It may be useful to circulate a draft RIS that has received a couple rounds of QA feedback, noting some things could change after Ministerial feedback.

RIA documents

Do the changes for RISs also apply to CRISs?

In general, the new impact analysis requirements apply to both RISs and Cost Recovery Impact Statements (CRISs). This means that:

- Agencies will need to provide draft CRISs to Ministers to accompany Cabinet papers at the time of Ministerial consultation.
- Limited impacts exemptions also apply to CRISs.
- Discussion documents for cost recovery proposals will be assessed against the revised criteria for discussion documents.

However, we have not yet revised the CRIS templates. For now, agencies should use the existing template linked to through RIA Online. You do not need to add the “at-a-glance” coversheet to your CRIS.