



**METHODIST  
ALLIANCE**  
NGĀ PURAPURA WETERIANA

# **Submission to the Finance and Expenditure Committee on the Regulatory Standards Bill May 2025**

**This submission is from:**

The Methodist Alliance  
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## **Ko wai tātou | Who we are**

The Methodist Alliance is a formal alliance of Methodist Missions, parishes and community based social services and trusts, including cooperating ventures. This grouping constitutes a major provider of a range of services for tamariki/children, rangatahi/young people, and their families/whānau.

The Methodist Alliance brings together a number of large and medium social service providers such as Lifewise in Auckland, Hamilton Methodist Social Services, Palmerston North Methodist Social Services, Wesley Community Action in Wellington, Christchurch Methodist Mission, Methodist Mission Southern in Dunedin, as well as local community services provided by individual parishes. It includes new social service organisations, such as Siaola Vahefonua Tongan Methodist Mission; Puna’Oa - the Samoan Methodist Mission that operates within the Samoan Synod of the Methodist Church; and Te Taha Māori.

Ka whakahōnore mātou i tō mātou whakahoatanga Tiriti – we honour our Tiriti partnership. Te Tiriti o Waitangi is the covenant establishing our nation on the basis of a power-sharing relationship. It is the foundation for social, economic and political equality in Aotearoa New Zealand.

The Methodist Alliance is grounded in our commitment to Te Tiriti o Waitangi and the bi-cultural journey of the Methodist Church of New Zealand - Te Hāhi Weteriana o Aotearoa, where Te Taha Māori and Tauīwi work in partnership. We claim the right bestowed by Article Four of Te Tiriti o Waitangi:

“E mea ana te Kawana ko ngā whakapono katoa o Ingarangi, o ngā Weteriana, o Roma, me te ritenga Māori hoki e tiakina ngatahitia e ia.”

“The Governor says the several faiths of England, of the Wesleyans, of Rome, and also the Māori custom shall alike be protected by him.”

The Methodist Alliance and our member organisations work collaboratively to achieve our vision of a just and inclusive society in which all people flourish, through our commitment to our faith and Te Tiriti o Waitangi.

## Tirohanga Whānau | Overview

The Methodist Alliance opposes this Bill, as it will

### Main Points

1. **Consideration of individual and corporate freedoms and rights should not override the public good.**
2. **The bill ignores its own standards and replicates functions.**
3. **The bill is vague, enabling a wide range of interpretations.**
4. **The bill is overwhelmingly opposed by the public.**
5. **The bill risks jeopardising the Crown's te Tiriti obligations.**

### Taunakitanga | Recommendations

**Point 1:** Consideration of individual and corporate freedoms and rights should not override the public good and collective rights.

The welfare of our communities and society is paramount, and more important than the needs of the individual and the right of companies to make profits. The making of well-balanced and holistic legislation requires the limitation of commercial activity and profit making in some cases to protect both communities and the environment. The current restrictions on felling of native timber, waste management and commercial fisheries are salient examples of this, and despite some resistance at the time of their creation they are now accepted as both necessary and useful.

Business and property rights are an important cornerstone of a liberal democracy and currently protect ownership and profits within *good reason* as laid out in the law. The right to make money already exists in our law-making process, and reinforcing it without at the expense of Māori, community and environmental rights is concerning.

Prioritising property and profit rights will allow for destructive actions by corporations to go ahead and for companies to seek compensation from public and community funds if legislation prevents them from making profits by harming others.

**Recommendation:** That this legislation not progress further, and the wellbeing of Māori, the environment and communities be prioritised over profits.

**Point 2:** The bill ignores its own standards and replicates functions.

The bill refers to the standards for good law-making, stating 'legislation should be the most effective, efficient, and proportionate response to the issue concerned that is available.'<sup>1</sup> As well as the issues of consultation mentioned above, this legislation forgets that the Legislation Design and Advisory Committee already exists and provides more comprehensive and non-partisan advice in this space.

The LDAC's Legislation Design Guidelines<sup>2</sup> are extensive and comprehensive, comprising 148 pages of detailed explanations regarding rights of individuals, communities and Māori, the latter two of which are not considered by the proposed legislation at all. The guidelines cover the entire process of law-making and are a robust framework which should not be replaced or replicated by a hastily put together and badly constructed piece of legislation.

The LDAC's members are appointed by the Attorney General and include senior public servants and lawyers – well equipped to both provide advice and to serve the government of the day. If changes are necessary, it would be more effective, efficient and proportionate to make changes to the LDAC and its functions than to replicate its services with another layer of bureaucracy.

**Recommendation:** That this legislation not progress further, and that any changes be made through the LDAC.

**Point 3:** The content of this bill requires clarification, as many of the principles are subjective and undefined.

Concepts such as good justification, fair compensation and reasonable amounts are all referred to within the bill, but with no guidance as to what constitutes good, fair or reasonable. While it would be an intensive process to prescribe these definitions for all possible situations, it is also unreasonable to provide no guidance for how to decide what is good, fair or reasonable.

Government agencies have raised concerns about the definitions of the principles themselves, especially those regarding liberties and the taking of property<sup>3</sup>. These agencies recommended that to clarify these principles they should include reference to the Bill of Rights Act and a public interest test. These steps would ensure the safety of

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<sup>1</sup> Regulatory Standards Bill (155-1)

<https://www.legislation.govt.nz/bill/government/2025/0155/latest/whole.html>

<sup>2</sup> LDAC (2021). *Legislation Guidelines 2021 Edition*. New Zealand Government. Available at: <https://www.ldac.org.nz/guidelines>

<sup>3</sup> Seymour, D. (2025). *Information Release Policy Approvals for Progressing a Regulatory Standards Bill* Ministry for Regulation. Available at: <https://www.regulation.govt.nz/about-us/information-releases/> Annex 5. Pp.2-3.

New Zealanders' pre-existing rights, and that the good of the public come before that of the individual.

**Recommendation:**

That this bill not progress further, and that future legislation in this space include clear and well-defined language.

**Point 4:** The bill has received an overwhelmingly negative response from the public, with 88% (20,108) of respondents to the initial consultation opposing it, and less than 1% clearly supporting it<sup>4</sup>. While evidence for the legislation and whether it is needed are also considered in this submission, it is important to note that our democratic processes rely upon politicians doing the will of their constituents, and that this has not been the case in this instance.

Representative democracy, especially MMP, is designed to allow a broad base of political perspectives to be heard in our parliament and law-making process. While parties are elected, and coalitions are formed based on broad policy platforms, when it is clear that some of these policies are deeply unpopular it is essential that they be reconsidered and stopped if necessary.

Unfortunately, this process has not been followed, and this bill has proceeded despite the opposition. The ongoing use of urgency to prevent scrutiny and a refusal to listen to the will of the voter is a distinct breach of democratic principles, and drastically reduces trust in government and our institutions.

The irony of this is that the bill makes explicit mention of consultation as a pillar of good law-making, which logically includes consideration of the views expressed in this process.

**Recommendation:** That this bill not progress further, and that the recommendations of public feedback be seriously considered in future.

**Point 5:** Te Tiriti must be included as a core consideration for good law-making.

Te Tiriti o Waitangi is the pou to which our society is anchored. It defines and regulates relationships between Māori and the Crown, and any bill looking to regulate the creation of laws must consider this as an essential element. This bill makes no explicit mention of te Tiriti o Waitangi and makes no requirement that it be considered to make high quality legislation.

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<sup>4</sup> Ministry for Regulation. (2025). *Departmental Disclosure Statement, Regulatory Standards Bill*. New Zealand Government. Available at:  
<http://legislation.govt.nz/disclosure.aspx?type=bill&subtype=government&year=2025&no=155> pp.9.

According to an Information Release from the Ministry of Regulation, the bill's impact on te Tiriti will 'ultimately depend on how it is implemented by decision-makers and the guidelines that are created to support the interpretation of its provisions.'<sup>5</sup> This means that consistency with and consideration of te Tiriti will be reliant upon the members of the Regulatory Standards Board, which is in turn appointed by a single minister.

Ultimately, te Tiriti o Waitangi would only be considered by the board if they and the Minister deemed it relevant. This is unacceptable when discussing the foundational document of our nation.

**Recommendation:** That this bill not progress further, and that any legislation impacting the rights of Māori be in accordance with Te Tiriti o Waitangi.

For further information or questions regarding this submission, please contact:

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<sup>5</sup> Seymour, D. (2025). *Information Release Policy Approvals for Progressing a Regulatory Standards Bill* Ministry for Regulation. Available at: <https://www.regulation.govt.nz/about-us/information-releases/> Annex 3. Pp.2.