

19 June 2025

Committee Secretariat
Finance and Expenditure Committee
Parliament Buildings
Wellington

Submission on Regulatory Standards Bill

Tēnā koutou

Age Concern New Zealand welcomes the opportunity to submit comments on the *Regulatory Standards Bill*. This Bill is relevant to all New Zealanders as well as Age Concern New Zealand and many other charities providing essential services to New Zealanders within local communities throughout Aotearoa.

We acknowledge there is much commentary in the public arena about the Bill. We note that similar legislation has been tabled over the past twenty-five years and has been rejected three times.

At a general level we are concerned that some of the terms in the Bill pose too high a risk of interpretation. The Bill uses terms such as ‘good’ and ‘high quality’ legislation. These terms are subjective and general. They will be interpreted very differently according to varied philosophical underpinnings. These terms raise questions such as ‘Good or high quality in whose view?’ and ‘Good for whom?’

Our view is that there are existing mechanisms to ensure that legislation is high quality, transparent, developed with consultation, and with options and cost-benefit analysis conducted. We consider that Parliament and the wider public should have responsibility for determining whether legislation is good or high quality rather than a Regulatory Standards Board.

Our Comments

1. Principles that serve the whole population well, particularly preventing public harm and protecting the public interest, are absent from those outlined in the Bill. The Bill therefore appears to underestimate the positive impact that government can have on people’s lives and the economy.

2. Public health measures must always be protected and prioritised in Aotearoa, for the benefit of all people, including older people. The prevention of disease, promoting good health, the health of the whole population rather than individuals, and eliminating health inequalities are vital to a thriving Aotearoa.¹

There are a growing number of people aged 65 years and older in Aotearoa New Zealand. Within ten years the over 65 population is expected to reach 1.2 million, with the over 85 age group being the fastest growing.² Currently one in six New Zealanders are aged 65+ and by 20235 this will be one in five.³

Over 65s are increasingly diverse with Māori, Pasifika and Asian older populations growing at a faster rate than European / Pakeha seniors. Within ten years there is expected to be approximately 928,000 older European or other New Zealanders and 109,400 older Māori.

Stats NZ has also reported that older people 65 and over have a significantly higher disability rate than the general population.⁴ In 2023, 35% of those aged 65 and over identified as disabled, compared to the national average of 17%. This increase in disability with age is attributed to various factors, including chronic health conditions and the effects of ageing.

This all means that older people, people with disabilities, and people who are experience poorer outcomes are dependent on legislation and regulation that prioritises public health, wellbeing and protecting our more vulnerable citizens.

3. The Bill appears to assume that people are on a level playing field and have equal opportunities available to them. This is not the case. Although many older people, for example, are well set up for retirement and older age, 40% of New Zealanders aged 65 and over are solely reliant on New Zealand superannuation and 20% have only a little more⁵ This means their lives are constrained by their limited fixed income.
4. We do not support commercial entities and businesses having the ability to claim compensation from public funds for any detrimental effects of public health regulations. If this was legislated, it may deter implementation of public health measures which support

¹ <https://teara.govt.nz/en/public-health/page-1>

² <https://officeforseniors.govt.nz/better-later-life-strategy/>

³ <https://www.1news.co.nz/2025/06/04/nz-population-likely-to-hit-6-million-before-2040-stats-nz/>

⁴ <https://www.stats.govt.nz/information-releases/disability-statistics-2023/#:~:text=In%202023%2C%20an%20estimated%2017,male%20rate%20was%2015%20percent.>

⁵ <https://retirement.govt.nz/policy-and-research/nz-super#:~:text=NZ%20Super%20is%20critical%20to,having%20only%20a%20little%20more.>

positive preventative actions that improve people's wellbeing and reduce health and social costs.

5. We are concerned that if the Bill is enacted it will be applied retrospectively to legislation already in place, not only new legislation. This poses a risk to legislation formulated on principles that are inclusive and focused on public good.

About Age Concern New Zealand

Age Concern New Zealand is a trusted charity working in local communities throughout Aotearoa New Zealand to support older people, their friends and whānau. We have 29 local Age Concerns operating in 40 locations throughout the country and a national office based in Wellington.

Our strategic goal is:

Every older person feels connected, has positive choices and can age well.

Our values of Dignity. Wellbeing. Equity and Respect for older people are our guiding lights and underpin everything we do.

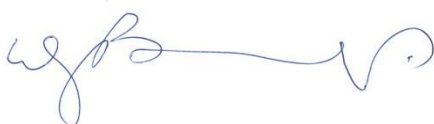
Our core services include advocacy and public awareness, social connection, health promotion, elder abuse and neglect prevention, and providing support through expert information, advice and referrals.

We are proud of our heritage in standing up for the rights of older New Zealanders for more than 75 years. As an organisation, our focus is on contributing to the overall wellbeing of older New Zealanders.

Closing Comment

Thank you again for the opportunity to provide our submission on the *Regulatory Standards Bill*, we are very interested to hear the outcome of the consultation process.

Nāku noa, nā,



Karen Billings-Jensen
Chief Executive
Age Concern New Zealand