



From a desire for the public good  
and a conviction that our religious  
tradition and experience  
provide riches of mind and heart  
that might help the world,

**Knox Church**  
**Ōtautahi Christchurch**

makes public statements  
about topical matters.

## **A SUBMISSION TO THE SELECT COMMITTEE CHARGED WITH THE RESPONSIBILITY OF RECEIVING FEEDBACK TO THE REGULATORY STANDARDS BILL**

This submission has been written by the Shalom Group of Knox Presbyterian Church, Ōtautahi Christchurch, and was endorsed unanimously on 18 June 2025 by the governing Council of Knox Church.

We strongly oppose the Regulatory Standards Bill for the following reasons:

1. It ignores our founding document, *Te Tiriti o Waitangi* and sidelines collective rights and responsibilities and the exercise of kaitiakitanga (guardianship, care and protection).
2. It is based on the extraordinary premise that 'most of Aotearoa/New Zealand's problems can be traced to poor productivity, and poor productivity can be traced to poor regulations.' This ignores the impact on productivity of poverty; educational inequality; housing insecurity; inadequate health care; reluctance of business to invest in R & D; over reliance on agriculture and tourism; and international factors beyond our control. And it implies that productivity is the principal goal of legislation.
3. In 2023 the World Bank gave New Zealand the top ranking in its 'Ease of Doing Business' survey, so clearly current regulations are not greatly restricting businesses, compared with the rest of the world, and such major loosening of our regulations is not necessary.
4. The bill is a vehicle for ideology of the ACT party, which obtained less than 10% of the vote, rather than a cross-party agreement, such as the Zero Carbon Act for example.
5. The Bill prioritises the interests of corporations and the wealthy, taking power away from communities and Parliament.
6. It prioritises corporate property and 'individual freedom' over environmental protection, public safety, and indigenous rights.
7. It is anti-democratic because (a) too much power is vested in one individual (the Minister for Regulation, currently Hon. David Seymour) and a committee whom this individual appoints; and (b)

the Minister for Regulation has the power to decide which proposed laws are exempt from consistency with the Act (should the Bill become law).

8. It threatens any sort of environmental protections, which could see vast development, resource exploitation, carbon emissions, biodiversity loss and pollution.
9. It distracts the government and the people from the major challenges facing civilization, viz. climate change, pollution, biodiversity loss and gross inequality. These issues and others cannot be resolved by improving productivity and making the wealthy wealthier.
10. It is manipulative because it reduces complex issues to simplistic or vague 'feel-good' statements (e.g., that low productivity is caused by 'poor regulation;' and New Zealand should have 'good laws').
11. It is an unfair and a dangerous constitutional shift because it prioritises private property rights and big business over the environment, public wellbeing, the New Zealand Bill of Rights and Treaty obligations.
12. It allows companies to block or seek to overturn rules targeting climate change, pollution, or public health issues, prioritising short-term profits over long-term societal needs.
13. We quote Emeritus Professor Jane Kelsey; *'In effect, a minor political party that attracted just 8.6% of the total vote in the general election is being permitted to bypass the democratic process that has three times rejected the proposed bill, in two cases through rigorous parliamentary processes. This is the antithesis of best practice regulatory standards, parliamentary democracy or the rule of law.'*
14. We again quote Emeritus Professor Jane Kelsey: *'The human and fiscal risk of risk-based, light-handed regulation or self-regulation over the past 30 years is manifest in the leaky building crisis, the Pike River mine tragedy, workplace deaths in forestry and on farms, finance company collapses, unsafe aged care, and dangerous adventure tourism.'*
15. We quote Emeritus Professor Jonathan Boston: *'The list of principles outlined in the Discussion Document does not include many principles that are relevant to good lawmaking, whether in the context of Aotearoa NZ or more generally. Among these are:*
  - i. the principles of te Tiriti o Waitangi*
  - ii. the public harm principle*
  - iii. widely accepted principles of distributive justice (e.g., meeting the basic needs of all people)*
  - iv. protecting the right to a clean, healthy, and sustainable environment*
  - v. protecting the interests of future generations*
  - vi. the precautionary principle*
  - vii. the requirement for governments to comply with their obligations in international law*
  - viii. the requirement for elected and appointed officials to exercise the powers conferred on them in good faith.*
16. We quote the Legislation Design and Advisory Committee which said the Bill was *'unnecessary to the extent that it restated existing constraints and principles of good lawmaking, ... and comes with the risks of unanticipated consequences and increased complexity.'* [Newsroom, June 4, 2025]

17. The Government of Aotearoa/New Zealand would be liable for paying compensation to corporates where current or new regulations restrict their financial return from exploitative activities. This effectively removes regulation of corporations, regardless of the damage that they might be having on the community and the environment.

18. The Bill will be costly to administer due to its implications for current and future Acts of Parliament. This will inevitably lead to expensive legal cases that will need to be funded by the taxpayer.

New Zealand needs regulations that protect New Zealand's resources, our whānau, and future generations. There are better ways to improve regulation than by applying this costly, unnecessary Bill. We urge the Select Committee to abandon it.



**Rev. Dr Matthew Jack**  
**Minister of Knox Church**



**Jean Brouwer**  
**Knox Church Council Clerk**