



# Women's International League for Peace and Freedom

*United Nations Consultative status with ECOSOC, UNESCO and UNCTAD  
Special relations with the ILO, FAO, UNICEF, and other organisations and agencies*

WILPF Aotearoa Section, PO Box 2054, Wellington 6140

13 January 2025

## **Submission: Regulatory Standards Bill**

The Women's International League for Peace and Freedom (WILPF) is a peace and disarmament organisation which has been working for social justice and a non-violent society since its establishment in The Hague in April 1915.

WILPF Aotearoa Section is strongly opposed to this proposed legislation.

The Regulatory Standards Bill has a long and contentious history, with four failed attempts to pass it. The proposed Bill would introduce significant constitutional reforms with profound implications for New Zealand because it seeks to constrain the scope of government regulation and law-making powers. This would represent a fundamental shift in where sovereign power resides.

The Bill does not meet its own standards – it is not good regulation. Minister Seymour's own Ministry of Regulation has advised him that this Bill does not meet the proposed regulatory standards. The Minister proposes future governments be subject to standards he himself ignores. In other words, the government has failed to follow several of the principles for 'good lawmaking' enunciated in the Bill, namely demonstrating that the proposed Bill is in 'the public interest', carefully evaluating a range of options that are 'reasonably available for addressing the issue' (i.e. the policy problem that the Bill seeks to mitigate); and providing a proper analysis of 'who is likely to benefit, and who is likely to suffer a detriment, from the legislation'.

The proposed Bill also removes (or disables) Te Tiriti o Waitangi and the New Zealand Bill of Rights from our law-making and regulatory systems. It sidelines collective rights and responsibilities, and the exercise of kaitiakitanga (guardianship, care and protection). Te Tiriti is currently a pillar of our law-making process – through the Legislation Design and Advisory Committee Manual – because it is our foundational constitutional document.

There are many other reasons to oppose this proposed Bill with many other expert submissions covering the reasons in detail. We particularly support emeritus Professor Jonathon Boston's submission.

To sum up, however, WILPF understands that this proposed Bill will enshrine limited principles that will be silent on wider human rights and equity issues and Te Tiriti. It is simply dangerous and would lead to the proposed principles – which focus on anything affecting existing property interests and individual liberty – being given primacy.

WILPF recommends that this proposed Bill is rejected in full.