

Submission to the Justice Committee on the:

Data and Statistics (Census) Amendment Bill

Submitted by the New Zealand Council of Trade Unions Te Kauae Kaimahi

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This submission is made on behalf of the 32 unions affiliated to the New Zealand Council of Trade Unions Te Kauae Kaimahi (NZCTU). With over 340,000 union members, the NZCTU is one of the largest democratic organisations in New Zealand.

The NZCTU acknowledges Te Tiriti o Waitangi as the founding document of Aotearoa New Zealand and formally acknowledges this through Te Rūnanga o Ngā Kaimahi Māori o Aotearoa (Te Rūnanga), the Māori arm of Te Kauae Kaimahi (NZCTU), which represents approximately 60,000 Māori workers.

Introduction

1. The NZCTU welcomes the opportunity to submit on the Data and Statistics (Census) Amendment Bill.
2. We note the importance of the census as the highest-quality source of population and dwelling data in New Zealand. Census data allows us to understand population and dwelling distribution and change over time and how people are connected to employment, public services, and their communities in different ways.
3. This data is essential for setting electoral boundaries, planning infrastructure, developing policy, providing the foundation for other nationally critical surveys, and understanding who we are as a society.
4. For the NZCTU, as a user of this data, the census is particularly important in understanding developments in employment, occupation, and income across different parts and populations of the country.
5. New Zealand will continue to experience significant population change in the coming decades, driven among other things by an ageing population, volatile migration flows, and differential fertility rates. It will also continue to experience significant change in patterns and ways of working, and possibly in income distribution.
6. It is critical we accurately apprehend the changing nature of our population going forward so that we can identify how to respond to any associated challenges.
7. The legislation before the Justice Committee will fundamentally change the way in which the census is conducted in New Zealand. It is a generational change to the foundation of our statistics infrastructure, and therefore New Zealand's state capacity, that needs to be carefully scrutinised. However, we do not believe this proposed change has yet received the level of scrutiny it requires.
8. **The NZCTU recommends this legislation is paused until an independent review of the implications of the proposed changes has been conducted and made publicly available.**

Comments

9. The NZCTU is not necessarily opposed in principle to changing the manner in which the census is conducted, or the sources of data that are used. We see that there could be value in a mixed census model, such as through more frequent publication of population data. However, we are concerned that the potential impacts of the move from a full enumeration census to a mixed model have not been fully explored.
10. There are particular concerns that have been flagged by Stats NZ, the Future Census Independent Evaluation Panel, and other independent experts regarding, among other things, the quality, comparability, and geographical granularity of data that the proposed new model will be able to deliver on various population groups, especially Māori, Pasifika, disabled people, and rainbow people.
11. For example, the regulatory impact statement of 28 April 2025 clearly notes that the preferred option of Stats NZ and the Minister, which is now expressed in the Bill, will result in some reduction in data quality in the medium term, i.e., the next 5–10 years, especially for minority communities.¹ Yet we lack detailed analysis of what these reductions in data quality will be and how they can be addressed. Given the administrative failures of the 2018 and 2023 censuses, stakeholders have good reason to be concerned about whether these risks will be effectively managed.
12. In its August 2024 report, the Future Census Independent Evaluation Panel examined 5 options for a transition to an admin-data first approach (the Panel was limited to examining only the 5 options outlined in its Terms of Reference). The Panel recommended that a staged approach was taken to implementing a data-first approach, with a final full enumeration survey conducted in 2028, followed by a move to using admin data plus a continuous attribution survey in 2033, to then settling on an updated model of admin data and continuous attribution surveys integrated into other Stats NZ household surveys in the years following 2033.
13. The Panel further recommended in its report that, “the Government Statistician reconvene this panel if any substantial alterations to the proposed options are incorporated into the Government Statistician’s recommendation to Cabinet for the manner of taking Census 2028.”² There were indeed substantial alterations to the proposed options in the Government Statistician’s recommendation to Cabinet. The Government Statistician’s recommendation was for an admin-data first census, supplemented by annual sample surveys and “partnership-based solutions”, to be delivered in 2030, with improvements expected iteratively from then on. Despite this change, no follow-up independent analysis of the costs and benefits of this approach has been commissioned.
14. In addition, there does not appear to have been a full regulatory impact assessment. The April 2025 RIS is classed as “interim”, and it is noted that an updated RIS would be prepared to support the introduction of the Bill. This is necessary because, as is outlined in the interim

¹ Regulatory Impact Statement: Modernising the Census, Statistics New Zealand, 28 April 2025, p. 3.

² Evaluation of New Zealand’s Future Census Options for 2028 and Beyond, Future Census Independent Evaluation Panel, 7 August 2024, pp. 28–29.

RIS, “the potential *scale* of distributional impacts across population groups and *detailed* costs and benefits for census customers will be subject to uncertainty until more detailed design and implementation work has progressed”. It is further noted that, “The level of data quality (accuracy, detail, and coverage) that will be delivered in the 2030 Census for variables that are not currently well-represented in admin data will depend on future decisions”. And finally, “This interim RIS is not able to provide a quantitative assessment of the financial costs of admin data improvements to specific government agencies and Crown entities at this time.”³ Given that improvements to admin data are essential to the success of an admin-data first model, and that the government is framing the new model within the fiscal constraints it has set itself, this lack of clarity on costings is particularly fraught with risk. Despite this, we have been unable to find an updated RIS online.⁴

15. Finally, we are also concerned that the proposed changes have been developed in the shadow of fiscal consolidation, imposed by the current government. This has had negative impacts on the quality of the regulatory impact analysis that has been conducted and has limited the consideration of options to those that are deemed to fit within current funding baselines.
16. For example, it is noted in the interim RIS that the options considered by the Future Census Independent Evaluation Panel “were found to significantly exceed the available funding. This meant the Panel’s preferred option for 2028 Census cannot be implemented as it was originally proposed”. We are disappointed that indicative costings were not conducted before the Panel was commissioned to develop its report, so that such a situation could be avoided. More importantly, we question the wisdom of fitting the analysis of potential census options within such a tight fiscal envelope, given the critical nature of the census to the integrity of our state statistics.
17. Overall then, the picture is one of significant uncertainty. It is acknowledged in the publicly available documents that the move to a new census model is fraught with risks. Despite this, analysis of these risks, how they could be mitigated, and whether mitigating actions are realistic in the context of (self-imposed) fiscal constraints has been lacklustre.
18. **The NZCTU’s recommendation is therefore that this legislation is paused until an independent review of the implications of the proposed changes has been conducted and made publicly available. This review should consider and report on data quality and comparability issues for all census questions and population groups. It should outline options for mitigating any potential negative impacts of the change and the costs involved with doing so. The Future Census Independent Evaluation Panel is a natural vehicle for conducting this review and could be recommissioned.**

Conclusion

19. The census is New Zealand’s most important source of population and dwelling data and is a crucial part of our state statistics infrastructure. The proposed changes in this Bill are

³ Regulatory Impact Statement, p. 5.

⁴ The RIS linked to in the Bill, and available through the Ministry for Regulation’s website, is the interim RIS of April 2025.

significant and need to be carefully evaluated. It is the NZCTU's view that further consideration of the risks associated with this Bill is necessary. The Bill should be paused until this analysis has been conducted by an independent expert panel.

20. The NZCTU thanks the Justice Committee for the opportunity to comment on this Bill.

For further information, please contact

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