

16 October 2013

Mr Murray Sherwin CNZM
Chair
New Zealand Productivity Commission
PO Box 8036
Wellington 6143

Customer Services
P. 03 353 9007 or 0800 324 636

PO Box 345
Christchurch 8140

P. 03 365 3828
F. 03 365 3194
E. ecinfo@ecan.govt.nz

www.ecan.govt.nz

Dear Murray

Issues paper: Regulatory institutions and practices

Thank you for the opportunity to comment on the Productivity Commission's issues paper.

I note that this inquiry focuses on regulatory regimes and regulators across central government, and that the Commission published its final report on local government regulation in May 2013.

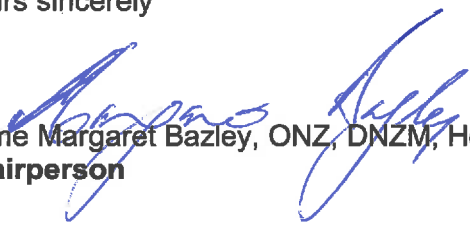
Environment Canterbury would be keen to see the inquiry include consideration of the balance between central and local regulation, with guidelines on when regulation is best undertaken centrally, and when locally. This relates to questions 1, 2 and 5 and figure 3.1 in the issues paper, and to achieving clarity of role, functions and duties (p 19). How can local government be better involved in the design of regulation by central government that needs to be implemented locally?

Questions 37 and 38 ask about combining regulators with similar functions, and when other solutions may be preferable. Our experience leads us to the view that amalgamation or mergers involve their own costs and unintended consequences. Collaboration, transfer of functions and delegation of responsibilities will often be preferable. Proposed 'Better Local Government' reforms may help facilitate that for local and regional government.

Environment Canterbury has experience and insight to offer on effective approaches to working in partnership with Māori (question 48), in terms of its *Tuia* partnership with Ngāi Tahu. This partnership has been built from the ground up, and has progressed from identifying and respecting past issues and grievances to working shoulder to shoulder to set in place new ways of working focused on solutions and practical outcomes. *Tuia* is premised on mutual good faith and commitment to do what is right and in the best interests of the iwi and the region, not on narrow interpretations of legislative requirements.

Please don't hesitate to contact me if you wish to discuss these matters further.

Yours sincerely



Dame Margaret Bazley, ONZ, DNZM, Hon D.Lit
Chairperson

Our Ref: GVNC/MCOM/1
Contact: