

08 April 2026

Committee Secretariat  
Justice Committee  
Parliament Buildings  
Wellington

Email: [ju@parliament.govt.nz](mailto:ju@parliament.govt.nz)

03 941 8999

53 Hereford Street  
Christchurch 8013

PO Box 73013  
Christchurch 8154

**ccc.govt.nz**

## **Christchurch City Council submission on the *Data and Statistics (Census) Amendment Bill***

### **Introduction**

1. Christchurch City Council (the Council) thanks the Justice Committee for the opportunity to provide comment on the Data and Statistics (Census) Amendment Bill.
2. We acknowledge and accept that there is a need for the traditional Census collection model to change from a 5-yearly full field enumeration model to an annual administrative data-first approach (supported by smaller sample surveys and targeted surveys), and that therefore the associated legislation needs to change to reflect these changes.
3. We are generally cautiously supportive of Statistics New Zealand's (Stats NZ's) approach to modernise the census, and in December 2025 we made a submission of a technical nature to Stats NZ regarding the proposed data collection approach and content for the Census.

Our submission noted that we have some concerns about how these changes will impact data quality and expressed that the changes should not come at the expense of spatial accuracy, geographic focus and depth of information required to understand our communities, inform decision making, policies, planning, and modelling among many other processes and workstreams across Council.

Regarding the use of administrative data, we noted reservations about its accuracy and consistency due to issues such as poor recording, delayed updates, and variations in monitoring across agencies. Furthermore, we raised our concerns regarding lower administrative data coverage for those who do not interact with government services, and we support ongoing work to strengthen administrative datasets.

Regarding the sample surveys and targeted surveys, we noted that smaller sample sizes will reduce detail for certain areas and communities, affecting cross-tabular and meshblock level data that is critical for Council reporting, growth modelling, planning, decision making, policies and understanding community needs.

We also raised concerns that while many people are digitally engaged, access is uneven amongst rural households, low-income households, elderly, and people in care, detention or unstable housing. Collecting data through digital-only methods may exclude some groups, resulting in systematic bias towards those who are digitally connected.

4. We would like to reiterate that our reservations remain about the accuracy and consistency of administrative data held by agencies, the reliance on digital collection methods, and the loss of detail and granularity at small geographic scales and for priority communities. To our knowledge, these concerns have not been addressed. However, we understand that these issues are beyond the scope of this Amendment Bill.

### **Submission**

5. Overall, we are cautiously supportive of the Data and Statistics (Census) Amendment Bill, with most of the amendments reflecting the change in operational approach (i.e. change in collection method). There is confirmation that the first annual census will take place in 2030, with Stats NZ required to publish census data every year thereafter.

We support the at least 3-yearly requirements for public engagement with Māori and consultation with other agencies, individuals and groups, including harder-to-reach groups. We also support the explicit requirement that engagement and consultation must be used to inform decision-making about future censuses, which supports Stats NZ's approach of working with communities to develop tailored solutions that help ensure census data reflects their needs.

6. In addition to the Data and Statistics (Census) Amendment Bill, we are also submitting on the amendments to the Local Electoral Act 2001 and the Waste Minimisation Act 2008, which are both impacted by changes made to the Data and Statistics Act and form part of this consultation.

We support the minor changes to the Local Electoral Act 2001, which confirm that census population counts and annual population estimates continue to be permitted sources of data. The major change is amending the definitions of counting day and census day to reflect the new concept of a reference date, which impact the amended sections of the Act.

Similarly, we support the necessary minor change to the Waste Minimisation Act 2008, which allows for an alternative source of population data (i.e. population estimates) to be used in financial years 2029/30 and 2030/31 when determining the share of the waste disposal levy that is payable to different local authorities. This is because the next census will be moved from 2028 to 2030, and the population data used for the calculation would be older than usual.

7. For full submission details please refer to Appendix 1 attached.

### **Conclusion**

8. We cautiously support the Data and Statistics (Census) Amendment Bill, acknowledging that the changes are necessary as the Census shifts from a 5-yearly full field enumeration model to an annual administrative data-first approach. We support this shift overall as it will enable us to have more timely information about our communities. However, our concerns remain around data quality and loss of vital outputs but we acknowledge that this Bill cannot address these concerns.

Thank you for the opportunity to provide this submission.

For any clarification on points within this submission please contact the Monitoring and Research team  
([monitor@ccc.govt.nz](mailto:monitor@ccc.govt.nz)).

Ngā mihi,



Phil Mauger

**Mayor of Christchurch**

## Appendix 1: Christchurch City Council staff submission on the Data and Statistics (Census) Amendment Bill

### Contents

Part 1: Main amendment to Data and Statistics Act 2022 .....	5
Section 4 amended (Te Tiriti o Waitangi/Treaty of Waitangi) .....	5
Section 5 amended (Overview) .....	6
Section 6 amended (Interpretation) .....	6
Section 34 replaced (Census of population and dwellings) .....	7
Section 35 replaced (Engagement with Māori on census) .....	8
Section 36 replaced (Consultation on census) .....	9
Section 37 amended (Review after each census) .....	10
Section 38 repealed (Duty to obtain details regarding request for data in census) .....	10
Section 76 amended (Failing or refusing to provide data) .....	11
Section 89 repealed (Infringement offence for failing to obtain request for data in census) .....	11
Schedule 1 amended .....	12
Part 2: Related amendments to other legislation .....	13
Amendments to Local Electoral Act 2001 .....	13
Amendments to Waste Minimisation Act 2008 .....	15

## Part 1: Main amendment to Data and Statistics Act 2022

### Section 4 amended (Te Tiriti o Waitangi/Treaty of Waitangi)

**Summary text from consultation document:** Clause 4 replaces [section 4\(e\)](#) of the Data and Statistics Act. Section 4(e) specifies that the Data and Statistics Act, in [section 35](#), recognises and respects the Crown’s responsibility to give effect to the principles of te Tiriti o Waitangi/the Treaty of Waitangi by requiring the Statistician to engage with Māori on the census. Section 4(e) is replaced to reflect the changes to section 35 made by [clause 8](#).

#### Technical changes:

#### **4 Section 4 amended (Te Tiriti o Waitangi/Treaty of Waitangi)**

Replace section 4(e) with:

- (e) in section 35, requires the Statistician to engage with Māori regarding the manner of collecting data for, and the data to be collected in, censuses of population and dwellings:

**Christchurch City Council’s position:** We support this change.

#### Reason for support:

This is a minor wording change that replaces the text “before determining the manner of taking” with “regarding the manner of collecting data for”, which does not affect existing treaty obligations.

Stats NZ’s disclosure statement provided to support this bill notes the following:

*“The Data and Statistics Act 2022 has existing obligations in relation to the Treaty of Waitangi, and these substantive provisions are not being amended by the Bill.*

*The Bill makes minor adjustments to the trigger provisions for Māori engagement reflecting the change in operational approach. Statistics NZ considers this does not in itself affect the consistency of the Act as amended with the principles of the Treaty. The Treaty Principles Officials Group has noted that this is a practical change.”*

## Section 5 amended (Overview)

**Summary text from consultation document:** Clause 5 amends [section 5](#) of the Data and Statistics Act, which is the overview section. Section 5(3)(d) is replaced to reflect the changes to sections 34 to 38 made by [clauses 7 to 11](#).

### [Technical changes:](#)

#### 5 Section 5 amended (Overview)

Replace section 5(3)(d) with:

(d) specific requirements regarding the census of population and dwellings (sections 34 to 37):

**Christchurch City Council's position:** We support this change.

**Reason for support:**

This is a necessary wording change, replacing the text “*specific requirements regarding the taking of the census of population and dwellings*” with “*specific requirements regarding the census of population and dwellings*”.

## Section 6 amended (Interpretation)

**Summary text from consultation document:** Clause 6 amends [section 6](#) of the Data and Statistics Act, which is the interpretation section, to insert a definition of financial year.

### [Technical changes:](#)

#### 6 Section 6 amended (Interpretation)

In section 6, insert in its appropriate alphabetical order:

**financial year** means a period of 12 months starting on 1 July and ending on 30 June

**Christchurch City Council's position:** We support this change.

**Reason for support:**

With the change to census data being reported for, and in, financial years, it is necessary to include the term ‘financial year’ and the dates defining a financial year in the list of terms (i.e. glossary).

## Section 34 replaced (Census of population and dwellings)

**Summary text from consultation document:** Clause 7 replaces [section 34](#) of the Data and Statistics Act. Section 34 requires the Statistician to take a census of population and dwellings of New Zealand in every fifth year. Section 34 also specifies other matters related to the taking of a census, such as the information about a census that the Statistician must publish on an internet site and by any other means.

Section 34 is replaced to provide that, in each financial year (starting 1 July and ending 30 June), the Statistician must publish statistics from a census of population and dwellings in relation to the reference date for the previous financial year (see new section 34(1)). The reference date is the date specified by the Statistician for that year by notice in the Gazette or, if a date is not specified, 30 June (see new section 34(4) and (5)).

The Statistician may collect data by any means described in section 22 of the Data and Statistics Act for the purpose of publishing statistics from a census (see new section 34(3)).

The main effect of the replacement of section 34 is that the Statistician is no longer required to take a census every 5 years. Instead, the Statistician must publish statistics from a census each year.

### Technical changes:

#### **7 Section 34 replaced (Census of population and dwellings)**

Replace section 34 with:

#### **34 Census of population and dwellings**

- (1) In each financial year, the Statistician must publish statistics from a census of population and dwellings of New Zealand in relation to the reference date for the previous financial year.
- (2) Subsection (1) does not prevent the Statistician from publishing additional statistics from a census in relation to that reference date in a later financial year.
- (3) For the purpose of publishing statistics under this section, the Statistician may collect data by any means described in section 22.
- (4) The Statistician may, by notice in the *Gazette*, specify the reference date for any financial year.
- (5) If the reference date for a financial year is not specified, the reference date is 30 June.

**Christchurch City Council's position:** We support this change.

#### Reason for support:

These are necessary and practical changes that reflect the change from a 5-yearly census model to an annual model, and the change in collection method from a self-completed questionnaire to an administrative data-first approach. We note that [section 22](#) still applies to the collection of data from the sample and targeted surveys.

## Section 35 replaced (Engagement with Māori on census)

**Summary text from consultation document:** *Clauses 8 and 9 come into force on 1 July 2030, the effect being that current [sections 35 and 36](#) of the Data and Statistics Act (which require the Government Statistician (the **Statistician**) to engage with Māori, and consult certain persons, before determining the manner of taking, and the data to be collected in, a census) apply in respect of the next census.*

### Technical changes:

#### **8 Section 35 replaced (Engagement with Māori on census)**

Replace section 35 with:

#### **35 Engagement with Māori on census**

- (1) At least every 3 years, the Statistician must engage with Māori regarding the manner of collecting data for, and the data to be collected in, censuses of population and dwellings.
- (2) The engagement must—
  - (a) occur in ways that the Statistician is satisfied will promote the fulfilment of the Statistician’s duty in section 14(a); and
  - (b) be used to inform decision-making about future censuses.

**Christchurch City Council’s position:** We support this change.

#### Reason for support:

This increases the Statistician’s requirement to engage with Māori from a 5-yearly cycle (i.e. before each census) to at least 3-yearly, and adds the requirement that engagement must be used to inform decision-making about future censuses.

We support ongoing engagement with Māori through the transition period, including on the proposed content.

We also note the minor change in wording from “*Before determining the manner of taking, and the data to be collected in, a census of population and dwellings, the Statistician must engage...*” to “*...must engage with Māori regarding the manner of collecting data for, and the data to be collected in, censuses of population and dwellings...*”.

## Section 36 replaced (Consultation on census)

**Summary text from consultation document:** *Clauses 8 and 9 come into force on 1 July 2030, the effect being that current [sections 35 and 36](#) of the Data and Statistics Act (which require the Government Statistician (the **Statistician**) to engage with Māori, and consult certain persons, before determining the manner of taking, and the data to be collected in, a census) apply in respect of the next census.*

### Technical changes:

#### **9 Section 36 replaced (Consultation on census)**

Replace section 36 with:

#### **36 Consultation on census**

- (1) At least every 3 years, the Statistician must consult the following persons regarding the manner of collecting data for, and the data to be collected in, censuses of population and dwellings:
  - (a) the public sector agencies and the Offices of Parliament that, in the opinion of the Statistician, have a particular interest in the census:
  - (b) the public generally:
  - (c) the individuals and organisations that, in the opinion of the Statistician, have a particular interest in the census.
- (2) The consultation—
  - (a) may occur in the manner that the Statistician thinks appropriate; and
  - (b) must be used to inform decision-making about future censuses.

**Christchurch City Council's position:** We support this change.

#### Reason for support:

This increases the Statistician's requirement to consult the public sector agencies and the Offices of Parliament, the public generally, and other individuals and organisations, from a 5-yearly cycle (i.e. before each census) to at least 3-yearly, and adds the requirement that consultation must be used to inform decision-making about future censuses.

We support this ongoing consultation through the transition period, including on the proposed content.

We also note the minor change in wording from "*Before determining the manner of taking, and the data to be collected in, a census of population and dwellings, the Statistician must consult...*" to "*...must consult the following persons regarding the manner of collecting data for, and the data to be collected in, censuses of population and dwellings...*".

## Section 37 amended (Review after each census)

**Summary text from consultation document:** *Clause 10 amends [section 37](#) of the Data and Statistics Act to require the Statistician to conduct a review of the census and present a report to the Minister at least every 5 years, rather than within 12 months after the last day of the period during which the census is taken.*

### Technical changes:

#### **10 Section 37 amended (Review after each census)**

- (1) In the heading to section 37, replace “after” with “of”.
- (2) Replace section 37(1) with:
  - (1) In at least every fifth financial year, the Statistician must—
    - (a) conduct a review of the operation of the censuses of population and dwellings that have been carried out since the last review; and
    - (b) present a report on the review to the Minister.

**Christchurch City Council’s position:** We support this change.

#### Reason for support:

We support the wording change of the section heading from ‘Review after each census’ to ‘Review of each census’. It would be onerous to undertake this annually, and each review will cover multiple censuses.

We note that initially the review will be 3-yearly and will be reported to the Minister in 2031/32 and again in 2034/35 (as per [Schedule 1 amended includes a new Part 2](#)), before being required in at least every fifth year.

## Section 38 repealed (Duty to obtain details regarding request for data in census)

**Summary text from consultation document:** *Clause 11 repeals [section 38](#) of the Data and Statistics Act, which requires an individual to obtain a copy of, or other details of how to access and respond to, a request made by the Statistician under section 23 as part of the census.*

### Technical changes:

#### **11 Section 38 repealed (Duty to obtain details regarding request for data in census)**

Repeal section 38.

**Christchurch City Council’s position:** We support this change.

#### Reason for support:

This is a necessary and practical change that reflects the change from a self-completed Census form to an administrative data-first approach. Under the previous Census model, the onus was on the respondent to request a paper form (if not already delivered to their dwelling) and return the form, and/or navigate to the online census

form to submit electronically. Although a small proportion of the population will be required to complete a supplementary or targeted survey, the obligation to comply with such a request remains in [section 29](#) of the Act.

## Section 76 amended (Failing or refusing to provide data)

**Summary text from consultation document:** *Clause 12 repeals [section 76\(2\)](#) of the Data and Statistics Act, which provides that it is not a defence to a prosecution under section 76 that neither a copy of, nor other details of how to access and respond to, a request made by the Statistician under section 23 as part of the census was delivered or given to the defendant.*

### [Technical changes:](#)

#### **12 Section 76 amended (Failing or refusing to provide data)**

Repeal section 76(2).

**Christchurch City Council's position:** We support this change.

### Reason for support:

This is a necessary and practical change that reflects the change from a self-completed Census form to an administrative data-first approach. We note that the remaining parts of [section 76](#) make provisions for failing or refusing to provide data for those who have been requested to complete a supplementary or targeted survey.

## Section 89 repealed (Infringement offence for failing to obtain request for data in census)

**Summary text from consultation document:** *Clause 13 repeals [section 89](#) of the Data and Statistics Act, which specifies that a person who fails to comply with [section 38](#) commits an infringement offence.*

### [Technical changes:](#)

#### **13 Section 89 repealed (Infringement offence for failing to obtain request for data in census)**

Repeal section 89.

**Christchurch City Council's position:** We support this change.

### Reason for support:

This is a necessary and practical change that reflects the change from a self-completed Census form to an administrative data-first approach. We note that [section 88](#) will address any infringement offence issues in regard to failing to provide data for those required to take part in an additional survey.

## Schedule 1 amended

**Summary text from consultation document:** Clause 14 inserts new Part 2 into [Schedule 1](#) of the Data and Statistics Act. New Part 2, as set out in Schedule 1 of this Bill, provides that, despite what new sections 34(1) and 37(1) require,—

- the Statistician is not required to publish statistics from a census of population and dwellings until the financial year that starts on 1 July 2030 and ends on 30 June 2031 (see new clause 9 of Schedule 1); and
- the Statistician must conduct a review of the census and present a report to the Minister—
  - in the financial year that starts on 1 July 2031 and ends on 30 June 2032; and
  - in the financial year that starts on 1 July 2034 and ends on 30 June 2035 (see new clause 10(1) of Schedule 1).

### [Technical changes:](#)

#### 14 Schedule 1 amended

In Schedule 1,—

- (a) insert the Part set out in **Schedule 1** of this Act as the last Part; and
- (b) make all necessary consequential amendments.

### Schedule 1

#### New Part 2 inserted into Schedule 1 of Data and Statistics Act 2022

s 14

### Part 2

#### Provisions relating to Data and Statistics (Census) Amendment Act 2026

#### 8 Interpretation

In this Part, **2026 amendment Act** means the Data and Statistics (Census) Amendment Act 2026.

#### 9 Statistician not required to publish statistics from census until 2030/31 financial year

Despite **section 34(1)** (as replaced by the 2026 amendment Act), the Statistician is not required to publish statistics from a census of population and dwellings until the financial year that starts on 1 July 2030 and ends on 30 June 2031.

#### 10 Statistician must review census in certain financial years

- (1) Despite **section 37(1)** (as replaced by the 2026 amendment Act), the Statistician must conduct a review under that section and present a report on the review to the Minister—
  - (a) in the financial year that starts on 1 July 2031 and ends on 30 June 2032; and
  - (b) in the financial year that starts on 1 July 2034 and ends on 30 June 2035.
- (2) For the purposes of the reference in **section 37(1)** to every fifth financial year, the financial year referred to in **subclause (1)(b)** is counted as the first financial year.

**Christchurch City Council's position:** We support these changes.

**Reason for support:**

This provides certainty around when the next census statistics will be published. It also provides clear timeframes for reviewing the census.

## Part 2: Related amendments to other legislation

### Amendments to Local Electoral Act 2001

**Summary text from consultation document:** *The Bill amends the [Local Electoral Act 2001](#) to ensure that local electoral settings remain aligned with the Act as amended and national electoral boundary review settings. Changing the definitions of counting day and census day to reflect the new census concept of a reference date is of primary interest. The data sources used in local electoral boundary reviews are not changing. Census data and population estimates continue to be permitted sources of population data.*

#### Technical changes:

#### 18 Principal Act

Sections 19 to 21 amend the Local Electoral Act 2001.

#### 19 Section 5 amended (Interpretation)

(1) In section 5(1), replace the definition of **assessment date** with:

**assessment date** means a date after both of the following dates on which the Government Statistician assessed the number of persons:

- (a) the date on which the Government Statistician most recently made a report under section 35(6) of the Electoral Act 1993;
- (b) the reference date of the most recently published census

(2) In section 5(1), definition of **estimated general electoral population**, replace “date with the exception of the estimated Māori electoral population” with “date, excluding the estimated Māori electoral population”.

(3) In section 5(1), replace the definition of **general electoral population** with:

**general electoral population** means—

- (a) the figure for the General electoral population that was most recently reported by the Government Statistician under section 35(6)(b) of the Electoral Act 1993; or
- (b) if 1 or more censuses have been published since that report, the total ordinarily resident population as shown by the most recently published census, excluding the Māori electoral population

(4) In section 5(1), replace the definition of **Māori electoral population** with:

**Māori electoral population** means—

- (a) the figure for the Māori electoral population as derived from the most recent report made by the Government Statistician under section 35(6)(a) of the Electoral Act 1993; or
- (b) if 1 or more censuses have been published since that report, a figure representing both the persons registered as electors of the Māori electoral districts and a proportion of Māori persons who are not registered as electors of any electoral district and a proportion of Māori persons under the age of 18 years, which figure must be fixed—
  - (i) by ascertaining a proportion determined by dividing—
    - (A) the total number of persons, as at the reference date of the most recently published census, either registered as electors of Māori electoral districts or named on the dormant rolls for Māori electoral districts; by
    - (B) the total number of Māori persons, as at the reference date of the most recently published census, either registered as electors of Māori electoral districts or General electoral districts or named on the dormant rolls for Māori electoral districts or General electoral districts; and
  - (ii) by applying the proportion ascertained under subparagraph (i) to the total number of ordinarily resident Māori persons as shown by the most recently published census

(5) In section 5(1), repeal the definition of **on census day**.

#### 20 Section 19X replaced (Certificate of Government Statistician)

Replace section 19X with:

#### 19X Certificate of Government Statistician

- (1) This section applies for the purposes of sections 19H to 19W.
- (2) A certificate issued by the Government Statistician as to the population of any region, district, local board area, constituency, ward, community, or subdivision or any proposed constituency, ward, community, or subdivision must specify—
  - (a) the ordinarily resident population of that area as shown by the most recently published census; or
  - (b) the ordinarily resident population of that area as otherwise assessed by the Government Statistician.
- (3) A certificate issued under this section may be used for the purposes for which it is issued, even if, after the certificate is issued, the Government Statistician publishes an updated figure of the ordinarily resident population of the area to which the certificate relates.
- (4) A territorial authority or a regional council must provide the Government Statistician with any information that the Government Statistician requires concerning the definition of an area to which a certificate is to relate.

#### 21 Schedule 1A amended

- (1) In Schedule 1A, repeal clause 7(2).
- (2) In Schedule 1A, repeal clause 7(2A).

**Christchurch City Council's position:** We support these changes.

Reason for support:

**Section 5 amended (Interpretation):**

Census population counts and annual population estimates continue to be permitted sources of population data. The Bill amends [Section 5](#) to ensure that local electoral settings remain aligned with the Act as amended and national electoral boundary review settings. Changing the definitions of counting day and census day to reflect the new census concept of a reference date is necessary.

**s19X – Certificate of Government Statistician**

This updates [Section 19X](#) to reflect the change from a 5-yearly census cycle to an annual census.

**Schedule 1A amended**

This repeals clause 7(2) and clause 7(2A) from [Schedule 1A](#) pertaining to population figures used in the Statistician's certificate specifying electoral populations, reflecting the change from a 5-yearly cycle to annual census.

## Amendments to Waste Minimisation Act 2008

**Summary text from consultation document:** *The Bill also amends the [Waste Minimisation Act 2008](#) to allow for an alternative source of population data to be used in financial years 2029/30 and 2030/31 when determining the share of the waste disposal levy that is payable to different local authorities. The share is based on the population in each district as shown in the last census. As the next census will be moved from 2028 to 2030, this data would be older than usual and allowing another source of data means estimated populations can be used instead.*

### Technical changes:

#### *Amendment to Waste Minimisation Act 2008*

### **22 Principal Act**

Section 23 amends the Waste Minimisation Act 2008.

### **23 Schedule 1 amended**

In Schedule 1,—

- (a) insert the Part set out in **Schedule 2** of this Act as the last Part; and
- (b) make all necessary consequential amendments.

### Schedule 2 New Part 2 to be inserted into Schedule 1 (as per 23(a) above):

#### **Schedule 2**

#### **New Part 2 inserted into Schedule 1 of Waste Minimisation Act 2008**

s 23

#### **Part 2**

#### **Provision relating to Data and Statistics (Census) Amendment Act 2026**

### **3 Definition of district's population for certain financial years**

- (1) This clause applies in respect of the following financial years:
  - (a) the financial year that starts on 1 July 2029 and ends on 30 June 2030;
  - (b) the financial year that starts on 1 July 2030 and ends on 30 June 2031.
- (2) Despite the definition of district's population in section 31(2), the **district's population** is—
  - (a) the population of the district of the territorial authority as assessed by the Government Statistician most recently before the start of the financial year; or
  - (b) if the district was constituted, or its boundaries were altered, after that assessment was made, the population of the district assessed by the Government Statistician as at the date of the district's constitution or boundary alteration.

**Christchurch City Council's position:** We support these changes.

**Reason for support:**

We support using the most up-to-date population statistics (i.e. estimated population) when calculating the levy for the 2029/30 and 2030/31 financial years, rather than relying on 2023 Census population counts.