

# Hon Simeon Brown

Minister for Energy  
Minister of Local Government  
Minister of Transport  
Minister for Auckland  
Deputy Leader of the House



OIA24-328

C Robertson  
[fyi-request-27571-79b3f920@requests.fyi.org.nz](mailto:fyi-request-27571-79b3f920@requests.fyi.org.nz)

Dear C Robertson,

I refer to your email dated 9 August 2024, requesting the following under the Official Information Act 1982 (the Act):

*Relating to my request for economic analysis, you refer me to the publicly available RIS, which I have read. To be clear, does the RIS reflect the entirety of the cost-benefit analysis referred to in the interview of 8 July 2024? In particular, I am interested in any analysis undertaken of detailed or quantified costs and benefits, and/or based on established CBA methodology. If the RIS draws on such an analysis, I am requesting that analysis, including information about the methodology.*

*Secondly, I reiterate my request for 'any safety analysis undertaken relating to the proposed Rule, such as modelling of the expected change in deaths and serious injuries (DSI), or analysis of historical DSI data', which your reply does not address.*

*Thirdly, I note that some elements of the drafting process are subject to legal privilege. I also requested a list of documents referred to in the drafting process and reiterate my request for that list, to the extent that it is not covered by legal privilege. I do not believe that studies and analyses referred to in order to provide an evidentiary basis for policy are subject as a category to legal privilege, so I request a list of documents referred to in order to establish an evidentiary basis for the draft rule.*

I am refusing parts one and two of your request as the information is publicly available on the Ministry of Transport's website. A link to the relevant document can be found here: <https://www.transport.govt.nz/assets/Uploads/Setting-of-Speed-Limits-Interim-RIS.pdf>.

Eight documents fall within the scope of your request and are detailed in the document schedule attached as Annex 1. The schedule outlines how the documents you requested have been treated under the Act.

Certain information is withheld under the following sections of the Act:

9(2)(f)(iv) to maintain the constitutional conventions for the time being which protect the confidentiality of advice tendered by Ministers of the Crown and officials

With regard to the information that has been withheld under section 9 of the Act, I am satisfied that the reasons for withholding the information at this time are not outweighed by public interest considerations that would make it desirable to make the information available.

You have the right to seek an investigation and review of this response by the Ombudsman, in accordance with section 28(3) of the Act. The relevant details can be found on the Ombudsman's website [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz)

Thank you again for writing.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Simeon Brown', written in a cursive style.

Hon Simeon Brown  
**Minister of Transport**

## Annex 1 - Document Schedule

| Doc # | Date       | Document   | Decision on release   |
|-------|------------|--|---|
| 1     | 1/12/2023  | OC230910 Initial advice on the setting of speed limits rule  | Refused under section 18(d) of the Act as the document is publicly available<br><a href="https://www.transport.govt.nz/assets/Uploads/Proactive-release-documents-redacted.pdf">https://www.transport.govt.nz/assets/Uploads/Proactive-release-documents-redacted.pdf</a> |
| 2     | 6/12/2023  | OC231031 Taking action on the 100-day commitment to stop blanket speed limit reductions - cabinet paper                                      | Refused under section 18(d) of the Act as the document is publicly available<br><a href="https://www.transport.govt.nz/assets/Uploads/Proactive-release-documents-redacted.pdf">https://www.transport.govt.nz/assets/Uploads/Proactive-release-documents-redacted.pdf</a> |
| 3     | 20/12/2024 | OC231067 Setting of speed limits rule review – terms of reference  | Withheld in full under section 9(2)(f)(iv) as the final Land Transport Rule: Setting of Speed Limits is under active consideration.   |
| 4     | 7/2/2024   | OC240067 New setting of speed limits rule timeline and policy confirmation   | Withheld in full under section 9(2)(f)(iv) as the final Land Transport Rule: Setting of Speed Limits is under active consideration.   |
| 5     | 15/2/2024  | Cabinet paper: update on our 100-day commitment to stop blanket speed limit reductions and start work on a new rule for setting speed limits | Withheld in full under section 9(2)(f)(iv) as the final Land Transport Rule: Setting of Speed Limits is under active consideration.   |
| 6     | 13/3/2024  | OC240201 Approach to the new speed rule  | Withheld in full under section 9(2)(f)(iv) as the final Land Transport Rule: Setting of Speed Limits is under active consideration.   |
| 7     | 10/4/2024  | OC240312 The new setting of speed limits rule: public consultation   | Withheld in full under section 9(2)(f)(iv) as the final Land Transport Rule: Setting of Speed Limits is under active consideration.   |
| 8     | 11/7/2024  | Draft results of the localised approach 14 June 2024   | Withheld in full under section 9(2)(f)(iv) as the final Land Transport Rule: Setting of Speed Limits is under active consideration  |