

The Treasury

Treasury Advice Related to Modernising the EQC Act Information Release

December 2021

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- [33] 9(2)(f)(iv) - to maintain the current constitutional conventions protecting the confidentiality of advice tendered by ministers and officials
- [34] 9(2)(g)(i) - to maintain the effective conduct of public affairs through the free and frank expression of opinions
- [35] 9(2)(g)(ii) - to maintain the effective conduct of public affairs through protecting ministers, members of government organisations, officers and employees from improper pressure or harassment
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Treasury Report: Future EQC Policy Work: Updated Scope and Timing for a Review of EQC Scheme and Act

Date:	18 June 2020	Report No:	T2020/1766
		File Number:	TY-2-1-17-2

Action sought

	Action sought	Deadline
Hon Grant Robertson Minister Responsible for the Earthquake Commission	<p>Meet officials to discuss ambition, process and timing of review of EQC Act.</p> <p>Indicate your preferences regarding timing and process for that review.</p>	<p>You are scheduled to meet officials regarding this paper at 4.30 p.m. Wednesday 1 July 2020</p>

Contact for telephone discussion (if required)

Name	Position	Telephone	1st Contact
Steve Cantwell	Principal Advisor, Earthquake Commission Policy Team ^[39]	[35]	N/A (mob)
Helen McDonald	Manager, Earthquake Commission Policy Team		✓

Minister's Office actions (if required)

Return the signed report to Treasury.

Note any feedback on the quality of the report

Enclosure: Yes

Treasury Report: Future EQC Policy Work: Updated Scope and Timing for a Review of EQC Scheme and Act

Executive Summary

This report provides information to support a discussion with you regarding the potential ambition, scope and timing of the future reform or review of the Earthquake Commission Act (the EQC Act).

We understand from your office that current Ministerial thinking is to modernise, rather than review, the EQC Act, and introduce amending legislation in June 2021.

Review of EQC Act – evolutionary/ modernising reform, or first-principles review?

We see three broad options regarding the level of ambition of a reform or review of the EQC Act. Of these, we consider that the first two options could see legislation introduced by June 2021, if no further formal public consultation occurs (i.e. there is no discussion document or exposure draft of the bill), and you make decisions no later than November 2020 on the final reform package to take to Cabinet in early 2021. Achieving this will be fairly demanding.

The options are:

- a **targeted reform** that identifies and implements a small set of discrete, high-priority changes, akin to the 2019 EQC Amendment Bill;
- an **evolutionary reform** that thoroughly reviews the EQC and the EQC scheme, including all relevant Inquiry recommendations, while retaining core features of the current design (we see this option as most closely matching an ambition to “modernise” the EQC Act); and
- a **first-principles review** that retests the objectives motivating the EQC intervention in insurance markets, and evaluates the EQC scheme design, against other intervention models. If the EQC model is endorsed, this would then become an evolutionary reform. If another model is preferred, this would then become a **comprehensive reform** initiative.

It would be infeasible to deliver the last option by June 2021, due to it considering, and requiring consultations on, more complex policy and option sets. However, the last option, being the most ambitious, also has the most scope to explore the potential for different future EQC designs to help address Ministers’ concerns regarding property insurance market dynamics, including affordability and availability, that have motivated other insurance work streams. Therefore we would like to discuss these options and competing priorities with you before you choose the path forward.

If introduction of amending legislation in mid-2021 is a key goal, we recommend an evolutionary (modernising) review. If the mid-2021 target introduction date is flexible, a first-principles review also becomes a viable option, trading off a longer process for a broader policy and option analysis.

Ideally the choice between the evolutionary and first-principles options would be informed by an assessment of the trade-off between the respective options’ effort, timing, and contribution to wider government goals.

However, we cannot properly assess that trade-off now, as that exercise involves links and dependencies with several other work streams that are on unknown or extended timeframes due to Covid-19, and are not yet mature enough to provide useful insights. That other work includes the outcomes of policy work on insurance market affordability, the National

Emergency Management Agency (NEMA)-led work on roles and responsibilities in the emergency management system, and the Department of Internal Affairs (DIA)-led cross-government Community Resilience work programme. Waiting for these work streams to generate products that can inform future EQC design choices would considerably delay an EQC Act review, and expose it to timing and delivery risks.

Reviewing monetary caps on EQC building cover

We have proposed in earlier advice that several of the recommendations of the Public Inquiry into the Earthquake Commission (the Inquiry) be addressed via a review of the EQC Act.

One Inquiry recommendation is that Government should review the monetary cap on EQC building cover to determine if it should reflect current building costs. You previously commissioned work on insurance affordability, now paused due to Covid-19 demands, that included reviewing monetary caps for EQC building cover. We would like an indication of your view on the future priority and timing of this work.

If you proceed with an evolutionary reform, we could provide advice on lifting the EQC cap as part of the broader reforms to the EQC Act. That advice would cover your options for implementing a new EQC cap, which if necessary could occur via regulation in advance of the passage of any EQC reform legislation.

Alternatively, if you proceed with a first-principles reform on a longer timeframe, a moderate change to the cap could be progressed in advance of the broader reforms. We could provide advice in October 2020 seeking policy decisions on lifting the EQC cap, and implementation, prior to the broader reforms.

We do not recommend a large increase in the EQC cap in advance of a first-principles reform. Significantly increasing the EQC cap would create transition costs for short-lived benefits if the reforms resulted in fundamental changes to the current EQC model.

Proactive release of Cabinet paper proposing changes to EQC cover of MUBs.

We also take this opportunity to seek a decision on timing for the proactive release of the Cabinet paper on the treatment of mixed-use buildings under the EQC Act. Do you wish the Cabinet paper be proactively released this Parliamentary term (including potentially to coincide with the release of the Government's response to the Public Inquiry into EQC), or when the bill is introduced next Parliamentary term?

Recommended Action

We recommend that you:

- a **meet** officials to discuss:
 - i. our recommendation that Government ambition be either an evolutionary (i.e. modernisation) or a first-principles review of the EQC Act, and therefore not be limited to a targeted reform; and
 - ii. your feedback on the proposed indicative process and timing for a future evolutionary reform of the EQC Act.
- b **note** the trade-offs between policy ambition, public consultation, and timing of a future EQC amendment bill outlined in this report;
- c **note** that, on reasonable planning assumptions, introducing an EQC Bill in June 2021 will require you make decisions no later than November 2020 on the final reform package to take to Cabinet in early 2021;

- d **indicate** whether you want the review of the EQC Act to be:
- i. evolutionary (modernising); or
 - ii. first principles.
- e **indicate** whether you want the review of the EQC Act process to include:
- i. a public discussion document; or
 - ii. an exposure draft of the EQC bill
- noting that, on our draft timeline, introduction of an EQC amendment bill in June 2021 is only possible if both these steps are omitted; and
- f **indicate** whether you want consideration of increasing the monetary cap on EQC building cover to be included as part of:
- i. an evolutionary reform of the EQC Act; or
 - ii. in advance of a first-principles reform of the EQC Act (implying a moderate increase to the cap); or
 - iii. as part of a first-principles review of the EQC Act on a longer timeframe.
- g **indicate** whether you wish the Cabinet paper and associated advice proposing changes to EQC's coverage of mixed-use buildings (CAB-20-MIN-0120 refers) be proactively released either:
- i. this Parliamentary term, or
 - ii. when the bill is introduced next Parliamentary term.

Helen McDonald
Manager, Earthquake Commission Policy

Hon Grant Robertson
Minister Responsible for the Earthquake Commission

Treasury Report: Future EQC Policy Work: Updated Scope and Timing for a Review of EQC Scheme and Act

Purpose of Report

1. The purpose of this report is to provide information to support a discussion with you regarding the potential scope and timing of the future reform or review of the EQC Act, including:
 - process and timing for that reform or review, and its links to related work, and
 - your level of ambition for a reform or review of the EQC Act.
2. This report updates and replaces T2020/212.

Background

3. A review of the EQC Act was first announced by the previous Government in 2012. That review envisaged a comprehensive policy and legislative review, culminating in a new EQC Act. Reform of the EQC Act, and associated policy issues, has been on Treasury's work programme since then. The EQC Amendment Act 2019 drew on that work to address four high-priority reforms. It increased EQC building cover from \$100,000 to \$150,000, exited EQC from contents cover, extended claims filing deadlines, and improved EQC's information-sharing powers.
4. During the policy process associated with the 2019 EQC Amendment Bill, the previous Minister Responsible for EQC indicated to Cabinet that she envisaged that the EQC Act would be substantively reviewed following the Inquiry (CAB-18-SUB-0081 refers).
5. Dame Silvia Cartwright PCNZM DBE QSO DSTJ was appointed in November 2018 to chair the Inquiry. The Governor-General received the Inquiry report on 27 March 2020, and it was presented to the House on 9 April 2020. Your accompanying press statement noted that "Many of the recommendations will require legislative change and will be included in a full review of the EQC Act, set to be undertaken next year."
6. We recently reported to you on a proposed Government response to the Inquiry (T2020/1325 refers). The draft Cabinet paper accompanying that report proposes that 10 of the Inquiry's 70 recommendations be addressed in a future review of the Earthquake Commission Act 1993 (the EQC Act). These 10 recommendations are listed in Appendix 1, along with four further recommendations where the proposed formal response is outside of the review of the Act, but an Act review could still usefully consider them.
7. Other policy work that directly touches on EQC policy or legislation includes:
 - work on insurance affordability, paused due to Covid-19 demands, which includes reviewing monetary caps for EQC building cover (DEV-19-MIN-0332 refers);
 - the proposal to amend the EQC scheme's coverage of mixed-use buildings that contain one or more dwellings (CAB-20-MIN-0120 refers); and
 - EQC's proposed move to an insurer agency model for EQC claims handling.

8. We are working with EQC to better understand the policy implications of the agency model for potential future policy choices, such as increasing the EQC monetary cap, or a future post-disaster managed repair programme.
9. Broader relevant contextual policy work includes NEMA-led work on roles and responsibilities in the emergency management system, the DIA-led cross-government Community Resilience work programme, and considering the recommendations of the Resource Management Review Panel. These work streams are described in more detail in T2020/1325 (*Proposed Government Response to the Public Inquiry into the Earthquake Commission*).
10. We would like to discuss with you options regarding the ambition, process and timing of the future reform or review of the EQC Act.

Review of EQC Act – an evolutionary/ modernising reform, or first-principles review?

11. Broadly we see three options, in order of increasing ambition, regarding the scope of a review of the EQC Act:
 - a **targeted reform** that identifies and implements a small set of discrete, high-priority changes, akin to the 2019 EQC Amendment Bill,
 - an **evolutionary reform** that thoroughly reviews the EQC and the EQC scheme, including all relevant Inquiry recommendations, while retaining core features of the current design (those features include that capped first-loss EQC cover is provided to homeowners by compulsory attachment to private insurers' fire cover, the community rating of EQC premium, and that EQC is able to, but not required to, handle its own claims), and
 - a **first-principles review** that retests the objectives motivating the EQC intervention in insurance markets, and evaluates the EQC scheme design, against other intervention models. If the EQC model is endorsed, this would then become an evolutionary reform. If another model, such as a reinsurance scheme along the lines of the UK's Flood Re, is preferred, this would then become a **comprehensive reform** initiative.
12. We have been advised by your office that current Ministerial thinking is to “modernise” rather than review the EQC Act, with a view to introducing an EQC amendment bill in June 2021. We think the option that most closely aligns with current Ministerial thinking is an evolutionary reform.
13. If introduction of amending legislation in mid-2021 is a key goal, we recommend an evolutionary (modernising) review. If the mid-2021 target introduction date is flexible, a first-principles review also becomes a viable option, trading off a longer process for a broader policy and option analysis.
14. Ideally the choice between the evolutionary and first-principles options would be informed by an assessment of the trade-off between the respective options' effort, timing, and contribution to wider government goals.
15. However, we cannot properly assess that trade-off now, as that exercise involves links and dependencies with several other work streams that are on unknown or extended timeframes due to COVID-19, and are not yet mature enough to provide useful insights. That other work includes the outcomes of policy work on insurance market affordability, the National Emergency Management Agency (NEMA)-led work on roles and responsibilities in the emergency management system, and the Department of

Internal Affairs (DIA)-led cross-government Community Resilience work programme. Waiting for these work streams to generate products that can inform future EQC design choices would considerably delay an EQC Act review, and expose it to timing and delivery risks.

16. While a first-principles review has the most risk being the most ambitious, it also has the most scope to explore the potential for different future EQC designs to help address Ministers' broader policy concerns regarding property insurance market dynamics, including affordability and availability, that have motivated other insurance work streams. Therefore we would like to discuss these options and competing priorities with you before you choose the path forward. The following section "Scope of Review" outlines some of the issues that would inform this decision.
17. We do not recommend a targeted reform as:
 - EQC has been subject to a wide range of internal and external reviews since 2011. Extracting the full benefits from those reviews, in terms of an EQC better positioned to achieve Government policy goals and deal with future claims events, will require making wide-ranging changes to the Act, even if an evolutionary approach is adopted. For instance, the Inquiry recommends that a purpose section be added to the EQC Act. Achieving the full benefits of doing this from a legal interpretation perspective would require reviewing the Act as a whole in light of the new purpose section,
 - the other two approaches provide Ministers the opportunity to consider their objectives for the scheme as a whole and the role they want the EQC to play in the future, and the design that best supports those objectives, well-informed by the lessons from, and the various reviews of, recent large claims events, and
 - the appetite for comprehensive legislative reform will reduce over time. A pattern in the history of the EQC Act is that major changes have only occurred after large claims events (the 1979 Abbotsford landslip, the 1987 Edgecumbe earthquake, and the current processes following the Canterbury and Kaikoura earthquakes).
18. The two main arguments for a targeted reform are time and resources – an evolutionary or first-principles review will take longer and make bigger demands on Ministers, officials and stakeholders. However, policy analysis undertaken for the review of the Act begun in 2012, positions us well for this work.

Scope of Review

19. Broadly, we see an evolutionary or first-principles policy and legislative review canvassing the following areas. While the phases are similar across an evolutionary or first-principles review, with a first-principles review each phase will ask more foundational questions, and take longer, than an evolutionary review. Both options would provide an opportunity to fully address all the Inquiry recommendations with implications for the EQC Act listed in Appendix 1.
 - **Determining EQC's intervention logic/ purpose/ policy objectives:** What does the Government want EQC to achieve? The current intervention logic for EQC centres on contributing to maintaining high rates of insurance uptake in higher-risk areas. Firming up the policy objectives will strongly shape our advice on design options.
 - **Design options (first-principles review only):** Identification and assessment of competing strategic designs and determining which best supports the Government objectives. This would include previously identified options such as

redesigning EQC to focus on large aggregate losses (akin to a conventional reinsurer), reversing the risk stack so private insurers take the initial loss and EQC the second layer of loss, and hybrid models such as the UK's Flood Re.

- **What EQC insures:** EQC should insure what buildings, what land, against what disasters, to what levels and on what conditions? The work on property insurance markets (paused due to COVID-19 demands) will help inform thinking on this.
 - **How EQC handles claims:** How should operational and policy aspects of claims handling design be balanced? Should there be more statutory guidance on claims handling matters e.g. claimant protections? Should EQC be required to use private insurers to handle its claims? Should the Act require EQC to offer dispute resolution processes for claimants?
 - **How EQC prices its insurance:** What statutory guidance and review provisions should be included? (EQC levy rates were unchanged from 1945-2012).
 - **How EQC manages financial risks and investments:** The EQC Act predates the Acts governing other Crown Financial Institutions and the Crown Entities Act. Should the provisions governing management of financial risks and investments be modernised?
 - **EQC's institutional design:** Should EQC retain all its current functions, or take on new ones? Is the governance model appropriate? Should it remain a crown entity?
 - **Technical improvements:** A raft of technical improvements have been identified, drawing on experience gained from operation of the Act to date, and various post-Canterbury reviews, including the Inquiry.
20. Proceeding with a review of the EQC Act ahead of completion of the NEMA-led work on agency roles would mean that the EQC Act would need to remain permissive and flexible regarding EQC's role in post-disaster managed repair. This would enable the updated EQC Act to accommodate a wide range of potential outcomes regarding EQC's future role in housing recovery.
21. For similar reasons, reforms to the Act would need to retain the current Act's flexibility regarding EQC's claims handling models, and permit both EQC handling its own claims, and also outsourcing, including insurers acting as EQC claims handling agent (T2020/1394 *Update on Insurer Finalisation - May 2020* refers).

When and How to Review the EQC Monetary Cap

22. You previously commissioned work on insurance affordability, now paused due to Covid-19 demands, which included reviewing monetary caps for EQC building cover. We would like an indication of your view on the future priority and timing of this work.
23. If you proceed with an evolutionary reform, we could provide advice on lifting the EQC cap as part of the broader reforms of the EQ Act. That advice could cover your options for implementing a new EQC cap, which could occur via regulation in advance of the passage of any EQC reform legislation.
24. Alternatively, if you proceed with a first-principles reform of the EQC Act on a longer timeframe, a moderate change to the cap could be progressed in advance. We could provide advice on lifting the EQC cap in October 2020 following the election.

25. We do not recommend a large increase in the EQC cap in advance of a first-principles reform. Significantly increasing the EQC cap would create transition costs for short-lived benefits if the reforms that resulted in fundamental changes to the current EQC model.
26. We do not know what level of the EQC cap implies a significant change to the EQC model. A key aspect is how the cap changes the role of private insurers. Previous feedback from the Insurance Council of New Zealand was that increasing the EQC cap to \$200,000 would be consistent with the current model, but a \$400,000 cap would have implications for the attractiveness of the residential catastrophe risk market to private insurers.

Timing and Process

27. An indicative structure and timeline of an evolutionary (modernising) review is outlined below. Three processes, with and without a public discussion document, and exposure drafts of an EQC bill, are shown. The need for a discussion document will depend on the level of ambition or complexity of the proposed reforms, and the extent they have already been canvassed in previous public consultative and engagement processes, including the 2015 discussion document, and the Inquiry. One gap to date in policy consultation to date is that with Māori. Further public consultation would provide an opportunity to remedy that.
28. The option without an exposure draft of the Bill is to meet a June 2021 introduction date. We would recommend the process including an exposure draft if possible.
29. On reasonable planning assumptions, introducing an EQC Bill in June 2021 will require you make decisions no later than November 2020 on the final reform package to take to Cabinet in early 2021. That would require engaging on a stream of substantive policy advice between now and November this year, i.e. through the period either side of the general election.

Indicative Timing	Phase		
To July 2020	Discuss this report with officials. Provide advice on high-level design issues, such as the policy objectives for EQC.		
Aug.-Oct. 2020	Further advice and decisions on all policy issues that are candidates for inclusion in the EQC Amendment Bill. General election 19 September.		
Nov. 2020	Ministerial decisions made on final EQC Act reform package to take to Cabinet in Feb 2021 (this timing and the timing below is based on an evolutionary reform; a comprehensive reform will take longer).		
Dec. 2020-Jan 2021	Drafting and officials' consultations on draft Cabinet policy paper on proposed changes to EQC Act paper.		
Late Jan. 2021	Consultation draft of Cabinet policy paper on EQC Act reforms delivered to Minister.		
Late Feb. 2021	Reform package taken to Cabinet.		
Early-mid 2021	Discussion Document released (typically 6-12 weeks for submissions, more if over Christmas holidays).	No Discussion Document PCO draft Bill	No Discussion Document and no exposure draft of Bill PCO draft Bill (PCO have previously advised drafting likely to require at least 16 weeks).

Indicative Timing	Phase		
Mid 2021	Consider feedback and finalise policy, Cabinet commission drafting of bill.	Cabinet approve exposure draft of bill for release, exposure draft released.	Cabinet approves bill as amended for introduction, bill introduced c. 1 June 2021.
Mid-late 2021	PCO draft bill (we anticipate PCO requiring at least 16 weeks).	Cabinet approves bill as amended for introduction; bill introduced.	Parliamentary process and passage.
Early 2022	Cabinet approve exposure draft of bill for release, exposure draft released (typically 3-6 weeks for submissions).	Parliamentary process and passage.	
Early-mid 2022	Cabinet approves bill as amended for introduction; bill introduced.		
Mid-late 2022	Parliamentary process and passage (assuming usual 6 months consideration by select committee).		
2022-2024	Phased implementation of new legislation (insurers have previously indicated that for major changes insurers need at least 18 months between enactment and implementation).		

Proactive Release of Cabinet Paper on EQC Cover of Mixed-Use Buildings

30. We would also like to take this opportunity to seek your decision on timing for the proactive release of the Cabinet paper, minute and associated advice on the treatment of mixed-use buildings under the EQC Act. Cabinet considered the paper, titled *'Mixed-use buildings under the Earthquake Commission Act'* on 23 March 2020 (CAB-20-MIN-0120 refers). However, due to Covid-19 priorities, work on drafting the bill has been paused. The Parliamentary Counsel Office advise that the bill will not be able to be introduced before the election.
31. There is a decision as to whether the Cabinet paper be proactively released this Parliamentary term, or when the bill is introduced next Parliamentary term. Either option is in line with Cabinet Office Circular CO (18) 4.¹ That states that all Cabinet papers must be released within 30 business days of final decisions being made by Cabinet, unless there is good reason not to publish all or part of the material or to delay the response. Reasons for delay include for purposes of aligning a release with a public announcement or a Bill to be introduced to the House.
32. Should you prefer an earlier release, one option would be to coincide the proactive release with the release of the Government's response to the Public Inquiry into EQC.
33. If you decide to release the Cabinet paper this term, we will provide you with a Treasury report including the versions of papers proposed for release and suggested redactions consistent with the Official Information Act 1987.

¹ Proactive Release of Cabinet Material: Updated Requirements: <https://dpmc.govt.nz/publications/co-18-4-proactive-release-cabinet-material-updated-requirements>

Consultation and Next Steps

34. We consulted EQC, NEMA and DIA on this report. The Department of Prime Minister and Cabinet has been informed.
35. We would like to discuss this report with you.

Helen McDonald
Manager, Earthquake Commission Policy

Hon Grant Robertson
Minister Responsible for the Earthquake Commission

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Appendix 1: Inquiry recommendations proposed to be addressed as part of review of EQC Act

#	Recommendation	Comment
[33]		
1.2.1	Consider inclusion of a purpose statement and set of principles in the EQC Act that will guide the discharge of EQC's responsibilities as an insurer with a social responsibility to claimants.	
1.3.1	Review the legislative framework so that there is a greater clarity of key provisions and definitions, including definitions of the phrases in the legislation such as "when new", and "reinstatement".	
1.3.2	Review the EQC Act in light of the High Court ruling on reinstatement of cover following each natural disaster event and other judicial determinations that have had a significant impact on EQC's work.	
1.4.1	Ensure that when ministerial directions or reviews are initiated these are clearly signalled, discussed with EQC to ensure that they will advance rather than hinder its response to a major natural disaster, and recorded.	
1.5.1	Review the EQC cap on residential building cover to establish whether it should reflect at least the current building costs and provide a mechanism for regular adjustment thereafter, as required.	
1.6.2	Consider a provision in legislation that allows EQC to work with the homeowner to enable necessary structural but non-natural disaster repairs to be dealt with at the same time as natural disaster repairs (at the homeowner's cost).	

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#	Recommendation	Comment
1.7.1	Consider the need for legislative change to provide greater clarity on EQC's responsibilities to property owners in multi-unit and mixed-use buildings.	<p>The draft Cabinet paper on responding to the Inquiry addresses this as a separate work stream.</p> <p>On 23 March 2020, Cabinet agreed to proposed amendments to the EQC Act focused on EQC cover of mixed-use buildings. These amendments would substantially address the concerns that led to the Inquiry's recommendations.</p> <p>If not progressed separately, this work could be incorporated in the EQC Act review.</p>
2.3.1	Ensure a suitable advisory group or body is in place to provide representative community input into its work and associated responsibilities. EQC must consider the advice and act upon it appropriately. Following a major natural disaster, a specific group or body should be established that reflects communities affected by that event.	<p>This recommendation could be addressed by legislative or non-legislative means.</p> <p>Any necessary legislative amendments through the review of the EQC Act.</p>
6.2.2	Consider how changes made to the EQC Act in 2019 can be used to enable better information sharing between it and private insurers.	The draft Cabinet paper on responding to the Inquiry addresses this as an operational issue. We anticipate that addressing this recommendation will include consideration of whether further legislative change is merited.
6.3.1	Consider a legislative requirement for private insurers to advise EQC at least annually of their residential policyholders' location and property ownership.	
6.4.2	Consider granting EQC standing to appear in formal land-use planning hearings.	
8.1.1	Develop a standing dispute resolution mechanism that is robust, accessible, timely and responsive to complainants, drawing on the experience of the Canterbury earthquakes, including the experiences of EQC and claimants; this may include enacting legislation to support such a mechanism.	The draft Cabinet paper on responding to the Inquiry addresses this as a separate work stream. Any EQC-specific (as opposed to more generic) mechanisms would likely be included in the review of the EQC Act.