

10 April 2026

Infrastructure New Zealand Submission on Data and Statistics (Census) Amendment Bill

Introduction

1. Infrastructure New Zealand (INZ) welcomes the opportunity to make a submission on the Data and Statistics (Census) Amendment Bill.
2. INZ is Aotearoa New Zealand's peak membership organisation for the infrastructure sector. We promote best practice in national infrastructure development through advocacy, policy, research and public and private sector collaboration. Our membership is comprised of around 150 organisations, including government agencies, consultants, contractors, financiers, utilities, and academics. These organisations employ approximately 150,000 people in infrastructure-related roles and are united in their commitment to creating a better New Zealand through outstanding infrastructure.
3. While INZ supports the intent to modernise the way population data is collected, we consider that the proposed administrative-data-first approach introduces material risks to data quality, comparability, and spatial resolution, particularly for infrastructure planning. There is currently insufficient evidence that administrative data systems can replace a traditional census without loss of critical information.

Census data as critical national infrastructure

4. Census data plays a foundational role in New Zealand's infrastructure system. It informs population projections, demand modelling, and long-term investment decisions across transport, housing, water, energy, health, and education. Infrastructure planning relies not only on understanding how many people live in New Zealand, but where they live, how they form households, and how these patterns change over time.
5. As population change, urban growth, and fiscal constraints place pressure on our infrastructure system, there is an even higher need for relevant, consistent, and comparable data.

Risks associated with an administrative-data-first model

6. INZ acknowledges the potential benefits of increased use of administrative data, including reduced respondent burden and the ability to produce more frequent updates. However, the proposed shift to an administrative-data-first model introduces several significant risks.
7. A key concern is the move away from a household- and dwelling-based framework toward one centred on individuals. This is likely to reduce the quality of information about households, family structures, and housing occupancy, which are critical inputs into infrastructure planning and service delivery. Many infrastructure decisions depend on understanding how people live together, not just individual characteristics.
8. There are also risks associated with the nature of administrative data itself. These datasets are not designed for statistical purposes and are collected inconsistently across agencies, with differing definitions, coverage, and update cycles. Integrating these datasets into a coherent and reliable statistical product is complex and may result in reduced data quality or increased uncertainty.
9. INZ is concerned that the proposed approach may reduce the availability and reliability of data at small geographic scales. High-resolution, place-based data is essential for infrastructure investment decisions. Any degradation in this capability would directly impact spatial planning and the prioritisation of infrastructure investment.
10. Finally, the proposed changes are likely to introduce a break in statistical time series. Loss of comparability with historical census data would limit the ability to track long-term trends, which are critical for infrastructure strategy, forecasting, and policy evaluation.

Implementation and system readiness

11. INZ is concerned that the readiness of administrative data systems to support a census function has not been sufficiently demonstrated. Administrative datasets across government have not been developed with common statistical standards or coordinated for integration. As a result, significant effort and investment will be required to align these systems to produce coherent and reliable outputs.
12. Without a clear, system-wide implementation framework – including governance arrangements, data standards, and quality assurance mechanisms – there is a risk that the new approach will not deliver data of equivalent quality to the current census. Given the central role of population data in public policy and infrastructure investment, these risks should be explicitly addressed before transitioning to a new model.

Need for independent expert review

13. The proposed shift represents a fundamental change to how New Zealand measures and understands its population. INZ considers that this warrants a properly resourced, independent expert review of the methodology, assumptions, and fitness-for-purpose of the proposed approach.
14. An independent review would provide an opportunity to assess the capability of administrative data to replace core census functions, evaluate the impacts on data quality and comparability, and consider the implications for key use cases such as infrastructure planning. Independent scrutiny would also help build confidence in the reform process and ensure that decisions are based on robust and transparent evidence.

A phased and hybrid transition approach

15. INZ supports the continued evolution of census methods, including the increased use of administrative data where appropriate. However, we consider that a phased or hybrid approach would better manage risk. This can happen by using administrative data to complement rather than replace survey-based collection.
16. Maintaining core elements of the traditional census, particularly those relating to households, dwellings, and small-area data, would help preserve data quality while improvements to administrative systems are made over time. A more gradual transition would also allow for testing, validation, and refinement of new methods before full implementation.

Conclusion

17. INZ supports the intent to modernise New Zealand's census approach and recognises the potential role of administrative data in achieving this. However, the census is a critical component of New Zealand's decision-making infrastructure, and changes to its methodology must be approached with care.
18. We recommend that a properly resourced independent expert review is undertaken, that implementation risks and system readiness are clearly addressed, and that a phased or hybrid transition approach is adopted. Ensuring the continued availability of high-quality, reliable, and spatially detailed population data is essential to supporting effective infrastructure planning and long-term national development.