26OIA1295

16 September 2025

[redacted]

Dear [redacted]

Thank you for your request made under the Official Information Act 1982 (OIA), partially transferred to Inland Revenue from the office of the Minister of Finance, Hon Nicola Willis on 29 August 2025. You requested the following:

1. *BN2025/314: Subject: Information release for review Budget 2025 Proactive Release*
2. *IR2025/315: International tax update*
3. *BN2025/316: Information release for review Budget 2025 Proactive Release (Minister of Finance only)*
4. *BN2025/330: Family Boost update*

### Information being released

I am partially releasing documents one, three, and four attached as **Appendix A**, with some information withheld under the following sections of the OIA, as applicable:

- 6(b)(i) – to avoid prejudice to the entrusting of information to the Government of New Zealand on a basis of confidence by the Government of any other country or any agency of such a Government,
- 9(2)(a) - to protect the privacy of natural persons,
- 9(2)(f)(iv) - to maintain the constitutional conventions for the time being which protect confidentiality of advice tendered by Ministers of the Crown and officials, and
- 9(2)(g)(i) - to maintain the effective conduct of public affairs through the free and frank expression of opinions by or between or to Ministers of the Crown or members of an organisation or officers and employees of any public service agency or organisation in the course of their duty.

As required by section 9(1) of the OIA, I have considered whether the grounds for withholding the information requested is outweighed by the public interest. In this instance, I do not consider that to be the case.

Please note that I am refusing the release of the attachments to documents one and three under section 18(d) of the OIA, as the information is publicly available on Inland Revenue's Tax Policy website (taxpolicy.ird.govt.nz) by searching for Budget 2025.

### Information withheld

I am withholding document two in full under section 6(a) of the OIA, to avoid prejudice to the security or defence of New Zealand or the international relations of the government.

**Right of review**

If you disagree with my decision on your OIA request, you have the right to ask the Ombudsman to investigate and review my decision under section 28(3) of the OIA. You can contact the office of the Ombudsman by email at: info@ombudsman.parliament.nz.

**Publishing of OIA response**

We intend to publish our response to your request on Inland Revenue's website (ird.govt.nz) as this information may be of interest to other members of the public. This letter, with your personal details removed, may be published in its entirety. Publishing responses increases the availability of information to the public and is consistent with the OIA's purpose of enabling more effective participation in the making and administration of laws and policies and promoting the accountability of officials.

Thank you again for your request.

Yours sincerely

Sam Rowe
**Policy Lead**

**Appendix A**
**Document 1**

Inland Revenue
Te Tari Taake

**Policy**
***Taukaea***
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PO Box 2198
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New Zealand

T. 04 890 1500

# Briefing note

| | |
|---|---|
| Reference: | BN2025/314 |
| Date: | 11 July 2025 |
| To: | Revenue Advisor, Minister of Revenue – Angela Graham<br>Private Secretary, Minister of Revenue – Helen Kuy<br>Revenue Advisor, Minister of Finance – Carl Harris |
| From: | Pamela Law |
| Subject: | **Information release for review –Budget 2025 Proactive Release** |

## Overview

1. This information release covers the Budget 2025 key advice papers provided to the Minister of Revenue from the Revenue Portfolio.

2. A list of documents identified as in scope of Inland Revenue's information release are listed below, with the proposed reasons for redactions noted. Other documents will form part of the broader Budget 2025 information release, led by The Treasury.

3. Inland Revenue intends to align the publication of this release with The Treasury's release of Budget material.

4. The scope of the Budget 2025 information release is similar to prior years. Reports in scope of the release include those that are:

   - Lead by Inland Revenue.
   - Contain key advice to Ministers on Budget 2025 initiatives.
   - Not part of another agency's Budget 2025 information release.
   - Not under active consideration.

## Documents in this release

5. The documents included in the information release are appended to this briefing note.

## Information withheld

6. Some parts of this information release would not be appropriate to release and, if requested would be withheld under the Official Information Act 1982 (OIA), Where this is the case, the relevant sections of the OIA that would apply are identified. Where information is withheld, no public interest was identified that would outweigh the reasons for withholding it.

Sections of the OIA under which information is withheld:

- S 6(b)(i) – to prejudice the entrusting of information to the Government of New Zealand on a basis of confidence by the Government of any other country or any agency of such a Government.
- 6(c) – to prejudice the maintenance of the law, including the prevention, investigation, and detection of offences, and the right to a fair trial.
- 9(2)(a) – to protect the privacy of natural persons.
- 9(2)(b)(ii) – to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or is the subject of the information
- 9(2)(f)(iv) – to maintain the constitutional conventions for the time being which protect the confidentiality of advice tendered by Minister of the Crown and officials.
- 9(2)(g)(i) – to maintain the effective conduct of public affairs through the free and frank expression of opinions by or between or to Ministers of the Crown or members of an organisation in the course of their duty.
- 9(2)(i) – to enable a Minister of the Crown or any public service agency or organisation holding the information to carry out, without prejudice or disadvantage, commercial activities.

7. The basis for withholding information from reports proposed for proactive release is indicated in the appended table.

8. Where a report or briefing note attached a draft version of a later published document (such as a consultation document), the draft will be withheld under s 9(2)(g)(i) (free and frank advice). The final published document is available on the Inland Revenue or Treasury website (as applicable).

9. The discharge of the Digital Services Tax Bill was reflected in Budget 2025. However, no reports relating to it will be proactively released on the grounds of international relations and trade sensitivities, as confirmed by Cabinet (CAB-25-SUB-0079 refers).

10. Documents which relate to the following initiatives have been withheld (wholly or wherever relevant) under s 9(2)(f)(iv) of the OIA (see comment on the Tax and Social Policy Work Programme below):

s 9(2)(f)(iv)

[redacted]

**Key advice papers**

11. Cabinet Office Circular CO (18) 4 states that "Ministers may also choose to proactively release related key advice papers provided to the Minister by departments or agencies.". Officials have provisionally included key advice papers as part of this release because we consider the release of the Cabinet documents will result in an Official Information Act request for these papers in any event.

## Risks and issues

12. Releasing this information carries several potential risks, including:

- Once the information is public, Inland Revenue cannot control how they are interpreted or used by media, advocacy groups, or other parties.
- Officials' advice on Budget 2025 initiatives could attract media coverage.
- Ministers may be asked to respond to media queries, especially if they include controversial or differing material. The release will cover projects at various stages of development.

13. Risk mitigations include:

- Published Budget 2025 material should help ensure that public and media commentary reflects the overall direction and outcome of Budget and could help to balance the public conversation.

## Specific comments

*Tax and Social Policy Work Programme*

14. The documents cover a lengthy period in 2024 until Budget Day 2025. The Tax and Social Policy Work Programme was published during this period and is currently being refreshed. Items on the work programme are not included in the proposed release as noted in paragraph 9 above and additionally on the basis that they will be subject to consideration for release at a more appropriate time.

*Investment Boost*

15. No further redactions are proposed for the key advice papers for the Investment Boost initiative.

*KiwiSaver reform*

16. Crown costs are referred to throughout the various reports. In two reports (IR2024/428 and IR2024/448) references to the fiscal cost of KiwiSaver changes as a cost to the Crown as employer have been withheld under s 9(2)(f)(iv).

*Working for Families abatement threshold changes*

17. All key advice papers for the Working for Families abatement threshold changes initiative will be released as a part of The Treasury's Budget 2025 information release.

*Budget 2025 announcements*

18. The thin capitalisation changes for infrastructure, employee share schemes, and foreign investment funds initiatives were included in the Budget 2025 Cabinet paper. The legislation to give effect to two of these policies will be included in the omnibus tax Bill introduced in August. This means that there will be a gap between the items included in the information release and the release of documents associated with the introduction of the Bill.

19. The employee share schemes papers will become public at the latest when the omnibus tax Bill and associated regulatory impact statements are released when the Bill is introduced. It will be clear from the regulatory impact statement that we did not recommend the proposal to be progressed.

20. The information release for the foreign investment funds is subject to redactions under s 9(2)(f)(iv) of the Act and could proceed as part of the Budget 2025 information release.

21. The thin capitalisation changes are subject to redactions under s 9(2)(f)(iv) and s 6(b)(i). s 9(2)(f)(iv), s 6(b)(i) [redacted]

*Budget process documents*

22. The documents in this release include reports and briefing notes relating to the overall Budget process. This includes documents for the Performance Plan, initiative submission, and finalisation of Budget documents and fiscal and economic update documents. We have applied appropriate redactions in these documents, including redacting advice on potential saving areas that may be under active consideration for future Budgets and maintaining effective conduct of public affairs through the free and frank expression of views. The Performance Plan provided to the Office at the end of June (IR2025/271 refers) will be included in the release.

23. The Tax Expenditure Statement for Budget 2025 has been included for consistency with previous Budget information releases. However, the Tax Expenditure Statement was published on Budget Day and is publicly available.

s 9(2)(g)(i) [redacted]

## Consultation

25. The Treasury, the Ministry of Foreign Affairs and Trade, the Ministry of Business, Innovation and Employment, and the Department of Internal Affairs were consulted regarding the proposed information release.

## Approval

26. The draft information release was reviewed and approved by Pamela Law (Principal Policy Advisor, International Tax).

## Attachments

27. Attached are the draft information release with proposed redactions marked but not applied.

s 9(2)(a) [redacted]

Pamela Law
**Principal Policy Advisor**
s 9(2)(a) [redacted]

## Documents in this information release

| # | Reference | Title | Date | Information withheld |
|---|---|---|---|---|
| **Taxation (Budget Measures) Bill (No 2)** | | | | |
| 1 | IR2025/174 | Draft Cabinet paper – Taxation (Budget Measures) Bill: Approval for introduction | 28/04/2025 | 9(2)(a), attachment withheld under 9(2)(g)(i) |
| 2 | IR2025/203 | Taxation (Budget Measures) Bill: detailed design and introduction of Bill | 5/05/2025 | 9(2)(a) |
| **Tax and Social Policy Work Programme** | | | | |
| 3 | BN2024/388 | Follow up to the Publishing the Tax and Social Policy Work Programme report | 20/09/2024 | 9(2)(f)(iv), 9(2)(g)(i) |
| **Tax Expenditure Statement** | | | | |
| 4 | BN2025/224 | Tax Expenditure Statement for Budget 2025 | 8/05/2025 | 9(2)(a), attachment withheld under 9(2)(g)(i) |
| **2025 Budget Economic and Fiscal Update** | | | | |
| 5 | IR2025/023 | Preliminary Tax forecasts for the 2025 Budget Economic and Fiscal Update | 25/02/2025 | 9(2)(a) |
| 6 | IR2025/088 | Final tax forecasts for the 2025 Budget Economic and Fiscal Update | 16/04/2025 | 9(2)(a) |
| **Investment Boost** | | | | |
| 7 | BN2025/084 | Briefing note on Investment Boost and a comparison between the preferred option and a company tax rate cut | 28/02/2025 | 9(2)(a) |
| 8 | BN2025/151 | Previous depreciation loading regimes in New Zealand | 3/04/2025 | 9(2)(a) |
| 9 | IR2025/168 | Dual effects of Investment Boost and KiwiSaver changes on businesses | 16/04/2025 | 9(2)(a) |
| 10 | BN2025/195 | Addendum to BN2025/168 | 24/04/2025 | 9(2)(a) |
| 11 | BN2025/222 | Treatment of assets under construction | 8/05/2025 | 9(2)(a) |
| **KiwiSaver reform** | | | | |
| 12 | IR2024/428 | KiwiSaver switch as part of Budget 2025 | 31/10/2024 | 9(2)(a), 9(2)(f)(iv) |
| 13 | IR2024/448 | Additional information on a possible KiwiSaver switch as part of Budget 2025 | 7/11/2024 | 9(2)(a), 9(2)(f)(iv) |
| 14 | BN2025/063 | Further information on a KiwiSaver switch as part of Budget 2025 | 18/02/2025 | 9(2)(a) |
| 15 | BN2025/156 | Allowing members to select a lower KiwiSaver contribution rate as part of Budget 2025 | 1/04/2025 | 9(2)(a) |
| 16 | BN2025/142 | Additional modelling of KiwiSaver impact as part of Budget 2025 | 2/04/2025 | 9(s)(a) |
| 17 | BN2025/148 | Wider KiwiSaver policy issues currently under consideration | 2/04/2025 | 9(2)(a), 9(2)f(iv) |
| 18 | BN2025/166 | Implications of KS reforms for self-employed and other matters | 8/04/2025 | 9(2)(a) |
| 19 | BN2025/183 | KiwiSaver and Total Remuneration | 22/04/2025 | 9(2)(a), 9(2)(f)(iv) |
| 20 | BN2025/215 | KiwiSaver - additional information requested | 8/05/2025 | 9(2)(a) |
| **Employee Share Schemes** | | | | |

| # | Reference | Title | Date | Information withheld |
|---|---|---|---|---|
| 21 | IR2024/064 | Initiatives to support the start-up and tech sector: Permission to consult | 15/03/2024 | 9(2)(a), attachment withheld under 9(2)(g)(i) |
| 22 | IR2024/379 | Consultation on improvements to employee share schemes | 2/10/2024 | 9(2)(a), 9(2)(f)(iv) |
| 23 | IR2025/126 | Employee share scheme deferral regime – outcome of consultation | 21/03/2025 | 6(c), 9(2)(a), 9(2)(f)(iv) |
| **Thin capitalisation changes for infrastructure** | | | | |
| 24 | IR2024/413 | Thin capitalisation settings for infrastructure | 13/01/2025 | 9(2)(a), 9(2)(f)(iv) |
| 25 | IR2025/141 | Official's issues paper on thin capitalisation settings for infrastructure | 15/04/2025 | 9(2)(a), 9(2)(f)(iv), attachment withheld under 9(2)(g)(i) |
| 26 | BN2025/188 | Supporting information for the issues paper on thin capitalisation settings for infrastructure | 23/04/2025 | 6(b)(i), 9(2)(a), 9(2)(f)(iv) |
| **Foreign Investment Funds** | | | | |
| 27 | IR2025/007 | Outcome of consultation on the effects of FIF rules on immigration | 10/02/2025 | 9(2)(a), 9(2)(f)(iv) |
| 28 | IR2025/233 | Foreign Investment Fund - Phase One technical decisions | 23/05/2025 | 9(2)(a), 9(2)(f)(iv) |
| **Petroleum development expenditure** | | | | |
| 29 | BN2025/083 | Accelerated deductions for petroleum development expenditure | 10/03/2025 | 9(2)(a), 9(2)(f)(iv) |
| **Budget Process Documents** | | | | |
| 30 | BN2024/368 | IR Performance Plan (Check-In 1): Approach and context supporting brief | 6/09/2024 | 9(2)(a), attachment withheld under 9(2)(g)(i) |
| 31 | IR2024/406 | Performance Plan and the potential to increase compliance activity | 3/10/2024 | 9(2)(a), attachment withheld under 9(2)(g)(i) |
| 32 | IR2024/450 | Performance Plan and the potential to increase compliance activity | 6/11/2024 | 9(2)(a), attachments withheld under 9(2)(g)(i) |
| 33 | IR2024/422 | Compliance funding bid for Budget 2025 | 28/11/2024 | 9(2)(a) |
| 34 | IR2024/479 | Inland Revenue Performance Plan: Performance Impacts - response to questions | 29/11/2024 | 9(2)(a), 9(2)(g)(i) |
| 35 | IR2024/496 | Budget 2025 submission for Vote Revenue | 13/12/2024 | 9(2)(a), 9(2)(f)(iv) |
| 36 | IR2025/011 | Vote Revenue Ministerial Certification of Contingent Liabilities and Contingent Assets as at 31 December 2024 | 13/02/2025 | 9(2)(a) |
| 37 | IR2025/012 | 2025 March Baseline Update submission for Vote Revenue | 21/02/2025 | 9(2)(a), 9(2)(b)(ii), 9(2)(g)(i), 9(2)(i) |
| 38 | IR2025/071 | Vote Revenue: 2025 March Baseline Update submission for the Research and Development Tax Incentive appropriation | 21/02/2025 | 9(2)(a), 9(2)(f)(iv) |
| 39 | BN2025/116 | Budget 25 - Proposed Technical Initiatives | 17/03/2025 | 9(2)(a) |

| # | Reference | Title | Date | Information withheld |
|---|---|---|---|---|
| 40 | IR2025/092 | Vote Revenue: 2025 Budget Economic and Fiscal Update for non-departmental expenditure appropriations | 17/04/2025 | 9(2)(a), 9(2)(g)(i) |
| 41 | IR2025/093 | Vote Revenue: 2025 Budget Economic and Fiscal Update submission for the Research and Development Tax Incentive appropriation | 17/04/2025 | 9(2)(a), 9(2)(g)(i) |
| 42 | IR2025/086 | Budget 2025 - Estimates and Supplementary Estimates for Vote Revenue | 24/04/2025 | 9(2)(a) |
| 43 | BN2025/196 | Overview of compliance funding bid for Budget 2025 | 2/05/2025 | 9(2)(a) |
| 44 | BN2025/206 | Tactical communications plan for Budget 25 | 2/05/2025 | 9(2)(a) |
| 45 | IR2025/271 | Performance Plan - final approval | 12/06/2025 | 9(2)(a), 9(2)(f)(iv), 9(2)(g)(i) |

Document 3

Inland Revenue
Te Tari Taake
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# Briefing note

| | |
|---|---|
| Reference: | BN2025/316 |
| Date: | 11 July 2025 |
| To: | Revenue Advisor, Minister of Finance – Carl Harris |
| From: | Pamela Law |
| Subject: | **Information release for review – Budget 2025 Proactive Release (Minister of Finance only)** |

## Overview

1. This information release covers the Budget 2025 key advice papers provided to the Minister of Finance from the Revenue Portfolio.

2. The scope of the Budget 2025 information release is similar to prior years. Reports in scope of the release include those that are:

   - Lead by Inland Revenue.
   - Contain key advice to Ministers on Budget 2025 initiatives.
   - Not part of another agency's Budget 2025 information release.
   - Not under active consideration.

## Documents in this release

3. These documents are included in the information release:

| # | Reference | Title | Date |
|---|---|---|---|
| 1 | BN2025/074 | Compliance bids note | 20 February 2025 |
| 2 | BN2025/243 | Costs of 100% expensing | 21 May 2025 |
| 3 | BN2025/244 | Partial expensing costing assumptions | 21 May 2025 |

4. No redactions are required in any of the documents.

## Key advice papers

5. Cabinet Office Circular CO (18) 4 states that "Ministers may also choose to proactively release related key advice papers provided to the Minister by departments or agencies.". Officials have provisionally included key advice papers as part of this release because we consider the release of the Cabinet documents will result in an Official Information Act request for these papers in any event.

## Risks and issues

6. Releasing this information carries several potential risks, including:
   - Once the information is public, Inland Revenue cannot control how they are interpreted or used by media, advocacy groups, or other parties.
   - Officials' advice on Budget 2025 initiatives could attract media coverage.
   - Ministers may be asked to respond to media queries, especially if they include controversial or differing material.
7. Risk mitigations include:
   - Published Budget 2025 material should help ensure that public and media commentary reflects the overall direction and outcome of Budget, and could help to balance the public conversation.

## Consultation

8. The Treasury was informed of the proposed information release.

## Approval

9. The draft information release was reviewed and approved by Pamela Law (Principal Policy Advisor, International Tax).

## Attachments

10. Attached are the key advice papers for your reference.

s 9(2)(a)

Pamela Law
**Principal Policy Advisor**
s 9(2)(a)

Document 4

Inland Revenue
Te Tari Taake

# Briefing note

| | |
|---|---|
| Reference: | BN2025/330 |
| Date: | 17 July 2025 |
| To: | Private Secretary, Minister of Revenue – Angela Graham<br>Private Secretary, Minister of Revenue – Helen Kuy<br>Private Secretary, Minister of Finance – Carl Harris and s 9(2)(a) |
| Copy to: | James Grayson, Deputy Commissioner<br>Sue Gillies, Customer Segment Lead - Families<br>Joanne Petrie, Executive Support Advisor to Commissioner<br>Carolyn Patchell, Management Support to Deputy Commissioner |
| From: | Sue Gillies, Customer Segment Lead - Families |
| Subject: | **FamilyBoost update** |

**Purpose**

1. The purpose of this note is to provide an update on FamilyBoost numbers and marketing and engagement activities following the announcement of the proposed changes to FamilyBoost.

**FamilyBoost registration and claim numbers**

2. Since FamilyBoost registrations opened until 9 July 2025, inclusive, we have received 82,326 registrations and created 81,311 accounts.

3. Since FamilyBoost claims opened until 9 July 2025, inclusive, we have received 217,669 claims and paid out $61,335,052.23 to 62,960 households.

**Marketing and Communications activities of proposed changes to FamilyBoost**

4. Following the announcement of the proposed changes to FamilyBoost, an article was published on both the main IR website and the IR Policy website. As of 9 July, there have been 4,103 views to the main page and 4,732 views to the Policy page.

5. We have issued a direct email to all licenced ECE's and Te Kōhanga Reo's. The open rate of the email as of 9 July has been 50.5%.

6. We have completed social media posts on IR's Meta (Facebook) and LinkedIn pages, reaching over 6,400 people across these channels.

7. We have sent communications to key stakeholders including tax agents and community organisations and presented details at the Early Childhood Advisory Committee (ECAC) meeting.

8. We have an 0800 message on our FamilyBoost phone line and a TV slide at each of the front of house IR offices. Internal communications have also been completed to IR people and updates have been made to our internal knowledge content.

9. When the legislation is passed additional marketing will be completed.

10. There has been positive feedback about the changes, ease of claiming, and the timeframe for FamilyBoost payments to be issued. Examples of comments (abridged):

    "I think this is a great scheme – takes about 5 mins max every 3 months"
    "It takes less than 5 mins"
    "Good news, claimed back twice with no issues and fast payment."
    "I had the rebate within two working days."

**Current marketing and promotion of FamilyBoost**

11. We have continued to market FamilyBoost each quarter via a range of media including digital, social, Google search etc. Upscaled marketing is ongoing in three targeted regions, Northland, Taranaki and Hawkes Bay where uptake had been low. From this marketing there has been an increase in claims from these regions.

12. Our Community Compliance Kaitakawaenga Māori have been working directly with each Kōhanga Reo to support them and their whanau in understanding FamilyBoost to encourage registrations and claims.

**Projected uptake from 1 October 2025**

13. The proposed changes indicate approximately 16,000 more households may be eligible to receive a FamilyBoost payment. Some of these households will already be registered for FamilyBoost, while others may register when the changes are legislated.

14. As of 16 July 2025, approximately 16,700 households had their FamilyBoost claims declined due to household income exceeding the current income threshold of $45,000 per quarter. However, under the proposed changes to the income threshold, an estimated 14,600 of these households may become eligible for FamilyBoost effective from 1 July 2025.

15. As of 16 July 2025, approximately 6,500 households have registered for FamilyBoost and have not submitted a claim.

16. When the FamilyBoost changes are enacted, we will contact these households to direct them to relevant web pages to check their eligibility for FamilyBoost and submit a claim.

Sue Gillies
Customer Segment Lead - Families
s 9(2)(a)