



Amendments for a Moderated NZ ETS: Further Policy Development

Date:	21 August 2009	MfE Priority:	Non-urgent
Security Level:		Number of Attachments:	One
		MfE Ref No:	09-B-02301

Action Sought

	Action Sought	Deadline
Minister for Climate Change Issues Hon Dr Nick Smith	Agree to further detailed policy for amendments to the NZ ETS as set out in this paper, which will form the basis for PCO drafting of amendments	1 September 2009

Ministry for the Environment Contacts

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Executive Summary

This briefing note seeks instructions from you in relation to further detailed policy for amendments to the New Zealand Emissions Trading Scheme (NZ ETS), after consultation with other Ministers as appropriate. This will form the basis for Parliamentary Counsel Office drafting of amendments to give effect to this detailed policy.

Proposals for detailed policy could be included in the revised Cabinet paper on Amendments for a Moderated NZ ETS, which you intend to submit for consideration by Cabinet on 7 September. Key deadlines within the process for amending the Climate Change Response Act (CCRA) are as follows:

- **1 September** - Instructions in relation to further detailed policy.
- **7 September** - Cabinet consideration of revised Cabinet paper.
- **14 September** - LEG paper lodged.
- **21 September** - Cabinet consideration of LEG paper.
- **22 September** - Bill introduced.

Additional briefing notes will follow on other outstanding issues for policy agreement. Other outstanding policy issues include (often these deal with details of policy):

- Content of an amendment bill in relation to free allocation to the agriculture sector.
- Agriculture sector point of obligation.
- Forestry allocation plan.
- Carbon accounting areas.
- Exports of units from the forestry sector.
- Joint venture participants.
- Independent regulator.

Price cap

It is proposed that a price cap will operate through the option for participants to pay a fixed fee to satisfy surrender obligations. This is administratively simple and reduces risks of arbitrage.

If a price cap is to be introduced for the post-2012 period, officials recommend this be done through future legislative amendment. A policy statement that the government will consider introducing a price cap post 2012 would usefully forewarn investors. (Note this is different from the Cabinet paper's view; if you wish to pursue a post-2012 price cap at this stage, options are for doing so are included in the text of this paper.)

Consequential changes to other removal activities

It is necessary to adjust the timing for other removal activities¹ and rate at which participants receive units for other removal activities before 1 January 2013, consistent with the revised stationary energy and industrial processes entry date and progressive obligation.

¹ "Other removal activities" refers to the production of products that embed carbon, where an upstream supplier is required to surrender units in respect of that carbon. Other removal activities participants are entitled to receive units to offset pass through costs from the coverage of the stationary energy and industrial processes sectors in the NZ ETS. Initially, the only qualifying other removal activity is methanol production.

Review of the NZ ETS

The CCRA prescribes minimum review requirements, which state that a review of the NZ ETS must be completed by the end of 2011. Officials recommend that free allocation is considered as part of this general review of the NZ ETS in 2011, instead of being reviewed separately in 2012. No change to the Climate Change Response Act is required in this regard.

50 by 50 target

There are three options for introducing the 50 by 50 target:

- Gazetting the target under the existing CCRA mechanism. This option would avoid imposing legal obligations on the Crown, but may give the target less perceived status than using another mechanism.
- Introducing a regulation making power for setting targets. This option may give the target greater perceived status than a gazetted target and could provide flexibility to amend the target in response to future IPCC Assessment Reports. However, the legal advice is that it is not appropriate to put guidance, such as the proposed target, in regulations.
- Setting the target in the purpose section of the CCRA. This option would give the target greater perceived status than the other two options, but would reduce flexibility and may have unpredictable legal implications (in respect of which further legal advice would ideally be sought).

If a regulation making power for setting targets is adopted but does not impose an enforceable obligation, the existing gazette mechanism could be argued to be redundant. Therefore, if a regulation making power for setting targets is introduced you may wish to repeal the existing gazette mechanism.

A number of targets have been set under the existing gazette mechanism in relation to electricity generation, transport emissions, forest area, agriculture emissions, a National Policy Statement on biodiversity, vehicle fuel efficiency, and use of woody biomass and geothermal. In introducing the 50 by 50 target you may also wish to review these targets.

Household Fund

You may wish to amend or delete section 223 of the CCRA which provides for the establishment of a Household Fund in the interests of consistency with, or signalling of, current government policy.

Recommended Action

We recommend that you:

- (a) **Note** further detailed policy decisions, including those set out below, will require Cabinet approval before an amendment bill is introduced
- (b) **Agree**, for the purposes of drafting, that the price cap mechanism should be based on the option of paying a fixed fee in satisfaction of surrender obligations **Yes / No**
- (c) **Agree**, for the purposes of drafting, there shall be no legislative provision for a price cap post-2012 at this stage **Yes / No**

- (d) **Note** that it may be worthwhile to issue a policy statement that the government will consider introducing a price cap post 2012 if this is your intent **Yes / No**
- (e) **Agree**, for the purposes of drafting, that participants would be entitled to receive only one unit for every two tonnes carbon dioxide equivalent of removals from other removal activities while a progressive obligation applies to the stationary energy and industrial processes sectors **Yes / No**
- (f) **Agree**, for the purposes of drafting, that other removal activities participants will accrue the right to receive units from the date that the stationary energy and industrial processes sectors commence to accrue surrender liabilities under the CCRA **Yes / No**
- (g) **Note** the Climate Change Response Act provides for a mandatory general review of the New Zealand Emissions Trading Scheme in 2011 which includes free allocation
- (h) **Agree**, for the purposes of drafting, to include free allocation in the general review of the New Zealand Emissions Trading Scheme to be undertaken in 2011 instead of reviewing free allocation separately in 2012 **Yes / No**
- (i) **EITHER**
- i. agree to set the 50 by 50 target under the existing mechanism for gazetting targets **Yes / No**
- OR**
- ii. agree, for the purposes of drafting, to adopt a regulation making power for setting targets (with a view to using it to introduce the 50 by 50 target) which also requires review of the target following future Intergovernmental Panel on Climate Change Assessment Reports **Yes / No**
- OR**
- iii. agree, for the purposes of drafting, to set the 50 by 50 target in the purpose section of the Climate Change Response Act **Yes / No**
- (j) **Advise** whether in response to adopting a regulation making power for setting targets you wish to retain or delete the existing gazette mechanism for setting targets **Retain / Delete**
- (k) **Note** if the existing target mechanism is repealed it may be appropriate to review existing targets
- (l) **Advise** whether you wish to retain, amend or delete section 223 of the Climate Change Response Act which provides for the establishment of a Household Fund **Retain / Amend / Delete**
- (m) **Refer** this briefing note to:
- i. Minister of Finance and Minister for Infrastructure **Yes / No**
- ii. Minister of Energy and Resources **Yes / No**

- | | |
|---|-----------------|
| iii. Minister of Agriculture and Minister of Forestry | Yes / No |
| iv. Minister of Trade and Associate Minister for Climate Change Issues (International Negotiations) | Yes / No |
| v. Minister of Transport | Yes / No |
| vi. Minister of Māori Affairs | Yes / No |

John Scott
Manager – Emissions Trading

Date

Hon Dr Nick Smith
Minister for Climate Change Issues

Date

Purpose of Report

1. This briefing note seeks instructions from you in relation to further detailed policy for amendments to the New Zealand Emissions Trading Scheme (NZ ETS). This will enable Parliamentary Counsel Office to draft amendments to give effect to further detailed policy.
2. Outstanding issues for further policy agreement addressed in this briefing note are:
 - a. Price cap.
 - b. Consequential amendments to other removal activities.
 - c. Review provisions.
 - d. 50 by 50 target.
 - e. Household Fund.
3. Further briefing notes will follow on other outstanding issues for further policy agreement. Other outstanding policy issues include:
 - a. Content of an amendment bill in relation to free allocation to the agriculture sector.
 - b. Agriculture sector point of obligation.
 - c. Forestry allocation plan.
 - d. Carbon accounting areas.
 - e. Exports of units from the forestry sector.
 - f. Joint venture participants.
 - g. Independent regulator.

Background

4. On 10 August Cabinet considered a paper on Amendments for a Moderated NZ ETS. The paper proposed (among other things):
 - a. A price cap of \$25 shall apply until 31 December 2012.
 - b. There shall be the ability to set a price cap in the period after 2012.
 - c. Stationary energy, industrial processes and liquid fossil fuels participants shall be required to surrender one emission unit for every two tonnes carbon dioxide equivalent emitted from 1 July 2010 to 31 December 2012.
 - d. The level of assistance for emissions-intensive, trade-exposed industry will be subject to a five-yearly review of free allocation, with the first review conducted in 2012.
 - e. A target of a 50% reduction of net greenhouse gases from 1990 levels by 2050 shall be set.
5. Cabinet deferred consideration of the submission, but agreed that Parliamentary Counsel Office (PCO) should commence drafting a bill to give effect to the proposed amendments. A number of outstanding issues relating to amendments to the NZ ETS require further detailed policy development to enable PCO to draft a bill.
6. You have indicated your intention to have a bill amending the Climate Change Response Act (CCRA) enacted by the week beginning 8 December. Even accounting for a truncated select committee process this implies that final policy agreement and approval to introduce an amendment bill will be sought in September. In accordance with these timeframes, it is essential that you provide instructions in relation to further detailed policy by 1 September at the latest (after consultation with other Ministers as appropriate). This will form the basis for PCO drafting of amendments to give effect to further detailed policy.

7. Cabinet also invited you, in consultation with other Ministers as appropriate, to submit a revised paper which includes:
 - a. The option of the agriculture sector entering the NZ ETS on 1 January 2015, including advice on the financial implications and options to offset costs.
 - b. Allowing the export of forestry-related New Zealand Units converted to assigned amount units, subject to further advice on the issue of arbitrage, the costs to the Crown, and the implications for compatibility with the Australian Carbon Pollution Reduction Scheme (CPRS).
8. You have indicated your intention to submit a revised Cabinet paper seeking final policy agreement on these issues for consideration by Cabinet on 7 September. Proposals for further detailed policy could be included in this Cabinet paper following your instruction.
9. An indicative timeline of the process for amending the CCRA is attached. Key deadlines are as follows:
 - **1 September** - Instructions in relation to further detailed policy.
 - **7 September** - Cabinet consideration of revised Cabinet paper.
 - **14 September** - LEG paper lodged.
 - **21 September** - Cabinet consideration of LEG paper.
 - **22 September** - Bill introduced.
10. Officials are in discussions with your office regarding options around consultation on amendments to the NZ ETS, including consultation with Māori. Final decisions in response to Māori consultation will need to be made between the Iwi Leadership Group (ILG) and Māori Reference Group Executive (MRGE) formally reporting on consultation on 14 September, and Cabinet Legislation Committee considering an amendment bill on 17 September.

Price cap

Price cap mechanism

11. The Australian Carbon Pollution Reduction Scheme (CPRS) provides for a price cap until the end of June 2016. To maintain the option of linking with the CPRS an NZ ETS price cap mechanism that is consistent with the CPRS would be desirable.
12. The CPRS price cap mechanism is summarised as follows:
 - a. Participants have the option of purchasing Australian emissions units (AEUs) from the Crown at a fixed price.
 - b. A participant may apply for the issue of fixed price AEUs from the time a participant's emissions return has been processed until the deadline for surrendering units.
 - c. The Australian Climate Change Regulatory Authority can immediately issue fixed price AEUs, provided the number of AEUs does not exceed the CPRS national scheme cap.
 - d. Once fixed price AEUs are issued they are automatically surrendered by a participant, thus fulfilling a participant's obligations. Fixed price AEUs cannot be traded or banked.
 - e. The price of fixed price AEUs will initially be set at around A\$46 per tonne in 2012/13, rising at 5 per cent real per annum until 2015/16.
13. A price cap mechanism for the NZ ETS could be designed to broadly reflect the CPRS mechanism. However while the CPRS provides for the immediate issue of AEUs, the NZ

ETS involves a lengthier and more complex process to issue New Zealand units (NZUs).² These process requirements preclude the implementation of an NZ ETS price cap through the issue and surrender of fixed price NZUs. Instead a price cap could be implemented through providing participants with the option to pay a fee in satisfaction of surrender obligations, instead of surrendering units.

14. It is proposed that an NZ ETS mechanism is designed as follows:

- a. Participants have the option of paying a fee, surrendering units, or a combination of these methods to satisfy surrender obligations.
- b. A participant may pay a fee in satisfaction of surrender obligations from the time a participant has submitted an annual emissions return until 30 April of the relevant year (the deadline for surrendering units).
- c. The fee shall amount to \$25 per tCO₂-equivalent emitted from 1 July 2010 until 31 December 2012.

Options for setting a price cap post 2012

15. The Cabinet paper considered on 10 August proposed the ability to set a price cap in the period after 2012. This would assist linking between the NZ ETS and CPRS before 2016 while a price cap applies under the CPRS. Options for setting a price cap post 2012 are set out below.

Regulation making power

16. To provide the greatest possible flexibility, the CCRA could be amended to provide an unconstrained regulation making power to set a price cap in the future. This would enable the Minister to introduce a price cap at any time, set at any value.
17. An unconstrained regulation making power would give rise to significant concerns relating to uncertainty. Firstly, participants would face uncertainty over whether to purchase units in advance of future surrender obligations, or wait for a possible price cap mechanism in the future. Secondly, it is possible that a future price cap would be accompanied by a ban on unit exports to mitigate fiscal risks, which may decrease the value of units. This would penalise net sellers of units (e.g. forestry³) and those who purchase units before a price cap is introduced, who would in effect be cross-subsidising the price cap. Finally, uncertainty may lead to reduced investment in abatement (e.g. reduced forest planting).
18. A post-2012 price cap could carry large fiscal and economic costs. It could also significantly impact upon the operation of the NZ ETS and the value of people's units. Therefore, there is likely to be opposition to an unconstrained regulation making power and pressure for greater Parliamentary control over the introduction of a price cap.
19. Given the policy downsides, this option is not recommended by officials. In addition, the inclusion of an unconstrained regulation making power may expose the Bill to censure from the Legislative Advisory Committee and/or the Regulations Review Committee. An unconstrained regulation making power to extend and amend the price cap could be considered to be a "Henry VIII clause" allowing the Executive to override Parliament (i.e. exercise of the regulation making power – especially if a low price cap were set – could theoretically undermine the purpose of the CCRA).

² Section 69 of the Climate Change Response Act requires the Minister to consult with the Minister of Finance and have regard to certain matters before directing the Registrar to issue NZUs.

³ Opposition should be expected from the forestry sector, which receives little benefit from a price cap. Furthermore, an export ban on pre-1990 forestry units would be seen as eroding the capital value of compensation for loss of land value.

Price cap through future legislative amendment

20. A post-2012 price cap could be introduced through a future amendment to the CCRA, instead of amending the CCRA to provide a mechanism for its introduction. Any future legislative amendment could be in response to a general review of the NZ ETS in 2011. This option would provide greater certainty that significant impacts on the value of units through the introduction of a price cap would not occur without a full Parliamentary process. It would also avoid concerns around providing the Minister with too much power to alter the operation of the NZ ETS.
21. The primary downside of this option is that it potentially fails to provide forewarning about a price cap post 2012, which may affect investors. This may be overcome through a policy statement that the government will consider introducing a price cap post 2012.
22. On balance, if a price cap is to be introduced for the post-2012 period, officials recommend this option.

Regulation making power with process constraints

23. Given concerns over uncertainty and providing the Minister with too much power to alter the operation of the NZ ETS, it may be appropriate to place process constraints on a regulation making power to set a price cap in the future. Process constraints would enable a price cap to be introduced under any circumstances, provided that a prescribed process was followed.
24. Potential process constraints include:
 - a. **Consultation.** The Minister would be required to release a consultation document including details about the level and duration of a price cap. Stakeholders would be able to lodge a submission on the proposed price cap for a prescribed period, and a report on submissions would have to be published.
 - b. **Parliamentary approval.**⁴ The Minister would be required to present a price cap proposal to the House of Representatives, along with any report on submissions on a price cap. The House of Representatives would have the power to prevent the price cap proposal from coming into force.
 - c. **Criteria.** It may be appropriate for the Minister to have regard to certain criteria in deciding whether to set a price cap, and the level and duration of a price cap. Criteria could include:
 - i. Adverse economic impacts arising from price uncertainty that would be reduced if a price cap were introduced.
 - ii. The extent to which the price cap is consistent with the relative emissions policies of New Zealand's trade competitors and trading partners.
 - iii. The extent to which the price cap is necessary for linking with another emissions trading scheme.
 - iv. Whether the price cap and any associated export ban have a significant net adverse effect on any individual, firm or sector.
 - v. Any alternatives that are available for achieving the objectives of the Minister in respect of setting the price cap.

⁴ This process could reflect the allocation plan process under section 79 of the CCRA.

25. This option is not recommended by officials. The requirement for Parliamentary approval means this option does not provide additional benefits to the option of a price cap through future legislative amendment. However, consultation requirements and criteria to consider potentially restrict flexibility.

Regulation making power with substantive constraints

26. Given concerns over uncertainty and providing the Minister with too much power to alter the operation of the NZ ETS, it may be appropriate to place substantive constraints on a regulation making power to set a price cap in the future. These could be instead of, or in addition to, process constraints. Substantive constraints would restrict the circumstances in which a price cap could be introduced.

27. Potential substantive constraints include:

- a. Sunset clause: A price cap under regulation may only apply until the end of 2016.
- b. A price cap being conditional on linking.
- c. Exports of units from the forestry sector being permitted despite any price cap unless it is necessary to ban such exports to allow linking to the CPRS.
- d. Requiring the Minister to have regard to (or be satisfied of) certain criteria.⁵

28. Officials do not recommend this option, for a number of reasons. Firstly, a price cap conditional on linking may not significantly increase certainty for stakeholders. Secondly, permitting forestry unit exports would help to build confidence in the forestry sector, but could potentially increase the fiscal risks of a price cap and prevent linking with the CPRS. Imposing parameters on the Minister's decision making power, by introducing criteria that he either must "have regard to" or "be satisfied of" is helpful from the perspective of good law making. If required, legal advice can be obtained on the legal risks of introducing criteria but imposing a "be satisfied of" in comparison to the lesser standard of "have regard to".

Consequential changes to other removal activities

29. As a result of the proposed reduced price period for the stationary energy and industrial processes sectors, consequential changes to provisions for other removal activities⁶ are necessary.

30. During the reduced price period, participants (other than forestry sector participants) would be required to surrender only one unit for every two tonnes CO₂-e emitted. A corresponding adjustment should be made to the number of units to which participants would be entitled in respect of removal activities other than forestry. Note also that it is proposed to align the commencement date for the right to receive emission units for other removal activities to the commencement of surrender obligations in relation to stationary energy and industrial processes.

⁵ Potential criteria include: consistency with the purpose of the CCRA; maintaining environmental integrity; costs not exceeding benefits; consistency with emissions policies of trading partners and competitors; and avoiding adverse impacts on any individual, firm or sector.

⁶ "Other removal activities" refers to the production of products that embed carbon, where an upstream supplier is required to surrender units in respect of that carbon. Other removal activities participants are entitled to receive units to offset pass through costs from the coverage of the stationary energy and industrial processes sectors in the NZ ETS. Initially, the only qualifying other removal activity is methanol production.

Review provisions

31. Under the CCRA, a review of the NZ ETS may be undertaken at any time using any method of review. Section 160 requires a general review of the NZ ETS to be completed by the end of 2011 (and at regular intervals beyond then), which includes consideration of international obligations, targets, linking with other emissions trading schemes, calculation methodologies, coverage of activities, and penalties. The general review must also consider issues relating to free allocation. The CCRA makes it clear that the review must be carried out by an appointed panel, the majority of which must be independent.
32. The Cabinet paper considered on 10 August proposed a five-yearly review of free allocation, with the first review conducted in 2012. A review of free allocation in 2012 may not provide substantial benefit if a general review of the NZ ETS which also covers free allocation is conducted in 2011. One option is to exclude free allocation from the general review in 2011. A further option is amending the CCRA to postpone the first mandatory review to 2012.
33. On balance, officials recommend retaining the status quo including free allocation as part of a general review in 2011. A review in 2011 is preferable to allow for any consequential legislative amendments in 2012, prior to the commencement of any future international commitments and the entry of the agriculture, waste and synthetic gases sectors into the NZ ETS. Furthermore, there would be nothing to preclude an additional review of free allocation in 2012. The 2011 general review could also consider whether a price cap post 2012 should be introduced through legislative amendment.

50 by 50 target

34. The Cabinet paper considered on 10 August proposed the introduction of a New Zealand target of a 50% reduction of net greenhouse gases from 1990 levels by 2050 (the 50 by 50 target). Three options exist for introducing this target.
35. One option is to introduce the 50 by 50 target through the existing mechanism for publishing targets established in the CCRA. The primary benefit of this option is that it would not require amendment to the CCRA and would enable a target to be set without imposing obligations on the Crown. The main downside is the perception that a 50 by 50 target notified in the *Gazette* would have a lower status than a target set under an alternative mechanism. However, the CCRA expressly requires a target to be set and provides for the gazetting of targets. The existing mechanism allows the target to be set, amended or revoked. Therefore any such gazette notice has the status of an instrument made pursuant to a statutory obligation.
36. Alternatively, a regulation making power for setting targets could be introduced. The regulation making power could also require the target to be reviewed following the release of future Intergovernmental Panel on Climate Change Assessment Reports. This has the benefit of being of a higher status than a target set under the existing gazette mechanism and would have the same legal effect as a target under the existing mechanism. Furthermore, this option would provide flexibility to amend the target in response to future IPCC Assessment Reports. However, the legal advice is that it is not appropriate to put guidance, such as the proposed target, in regulations. Regulations are a form of delegated legislation that establishes enforceable obligations. Unless there is an intention to impose an enforceable obligation in relation to the target, which officials do not recommend, then it may not be appropriate to introduce a regulation making power into the CCRA.
37. Finally, the 50 by 50 target could be included in the CCRA, most likely in the purpose section. The primary benefit of this option is that it gives the target greater status than

the other two options. However, it would reduce flexibility to revise the target, which may be desirable in response to any future international obligations or changes to accounting rules for emissions, as any change would require Parliamentary approval. Furthermore, previous legal advice indicated that the intended function of a target expressed in the purpose section may be unclear, and there may be unpredictable legal implications stemming from reference to the target in judicial interpretation of provisions of the CCRA. If setting the target through the purpose section is your preferred option, further legal advice would ideally be sought.

38. If a regulation making power for setting targets is adopted but does not impose an enforceable obligation, the existing gazette mechanism could be argued to be redundant. Therefore, if a regulation making power for setting targets is introduced you may wish to repeal the existing gazette mechanism.
39. In setting the 50 by 50 target you may also wish to review the following targets that have been set under the existing gazette mechanism:⁷
- a. By 2025, 90 per cent of our electricity generation will be from renewable sources (based on an average hydrological year).
 - b. By 2040, our per capita transport greenhouse gas emissions will be reduced by half of those in 2007.
 - c. By 2020, we will achieve a net increase in forest area of 250,000 hectares above that in 2007.
 - d. By 2013, we will reduce greenhouse gas emissions from the agricultural sector compared to business as usual by 300,000 tonnes of CO₂ equivalent.
 - e. To promulgate a National Policy Statement (NPS) on biodiversity by 1 February 2011.
 - f. By 2015, the average emissions performance of light vehicles entering the fleet will be 170g/km of CO₂.
 - g. By 2025, we will utilise up to 9.5 PJ per year of energy from woody biomass or direct use geothermal additional to that used in 2005.

Household Fund

40. In the context of widespread amendments to the CCRA, you may also wish to review section 223 of the CCRA, which provides for the Household Fund. The key features of section 223 are that:
- a. A total of \$1 billion must be paid into the Household Fund by 2024.
 - b. The Household Fund may be used for purposes including household insulation and clean heat retrofits, energy efficient appliances and lighting, and space and water heating efficiency programmes.
 - c. The Minister must, on the advice of the Energy Efficiency and Conservation Authority, determine criteria for the use of the Household Fund.
41. Given that there is no immediate requirement to pay additional funds into the Household Fund (the deadline for payment is 2024), there is no urgent need to amend or delete section 223. Furthermore, the government has already gone some way toward meeting the requirements of section 223 through establishing the \$323 insulation fund. However, this matter is drawn to your attention in case you wish to revise section 223 in the interests of consistency with, or signalling of, current government policy.

⁷ New Zealand Gazette, Notice Number 7342, 2008.

NZ ETS Amendment Bill – major milestones up to introduction of Bill

<i>Milestone</i>	<i>To be achieved by</i>
Current ETS Review Select Committee reports	End of August
Instructions in relation to further detailed policy	1 Sept
Cabinet consideration of revised Cabinet paper	7 Sept
ILG/MRGE report received	14 Sept
PCO finalises amendment Bill	14 Sept
LEG paper lodged	14 Sept
LEG gives approval to introduce Bill	17 Sept
Cabinet confirms approval to introduce Bill	21 Sept
Bill introduced	22 Sept