



Accounting for ACC

PIE Briefing 2025-1

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In 1974 New Zealand adopted the most revolutionary and innovative system for no fault accident compensation in the Western world: the Accident Compensation Corporation, known by the acronym ACC. The defining legislation had its genesis in the 1967 Woodhouse report: [*Compensation for personal injury in New Zealand. Report of the Royal Commission of Inquiry.*](#)

Injury arising from accident demands an attack on three fronts. The most important is obviously prevention. Next in importance is the obligation to rehabilitate the injured. Thirdly, there is the duty to compensate them for their losses. Sir Owen Woodhouse 1967 Royal Commission report.

PIE (formerly the RPRC) has worked with [the ACC Futures Coalition since the early 2000s](#) to uphold the Woodhouse principles. These are:

1. Community responsibility
2. Comprehensive entitlement
3. Complete rehabilitation
4. Real compensation
5. Administrative efficiency.

PIE sees ACC first and foremost as **social insurance**, as did Sir Owen Woodhouse. Over the years since the classic 1967 Woodhouse report, ACC has been gradually reframed around private insurance principles. PIE supports a return of ACC to social insurance to allow ACC to evolve successfully in the very different times of the 21st century, to simplify, and to better address accident prevention and other goals. This PIE briefing² is related to the financing and budgetary issues, while future briefings will examine other aspects.

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² PIE Briefings are technical papers that cover various aspects of superannuation, ACC, and tax policy in New Zealand.

Contents

Introduction 3

Background..... 3

Current funding arrangements 4

Origins of the requirement to be fully funded 5

Accounting issues..... 5

 What happens to ACC’s reserves? 7

The levy system..... 7

 Industry Risk Levies 7

 Experience Rating 8

Discussion 9

The way forward 10

Appendix 1: Funding policy 11

Appendix 2: OBEGALx 12

Appendix 3 Some examples of the work-related levy rates and changes between
2024/25 and 2025/2026 13

Introduction

Over the long history of ACC, fundamental questions and themes have re-occurred. The former RPRC was very active in ACC debates from the early 2000s.³ In 2025, PIE is working with the ACC's Futures Coalition to progress these issues.

This paper focuses three unresolved questions around the financing of ACC:

- Is ACC just private insurance run by the state with implications for accounting for its activities like a private business, or a genuine social insurance programme with different aims and accountability requirements?
- Is the complexity of the levy system justified?
- Are incentives for safety 'working?'

Background.

ACC has been much admired internationally, but no other country has adopted in full the radical aspects of the ACC legislation. The defining characteristics are that 24-hour cover extends for all personal injuries regardless of fault, and that there is no right to sue for damages for such injuries.

The scheme was first introduced as the outcome of the deliberations by the Royal Commission of Inquiry: Compensation for personal injury in New Zealand (the Woodhouse report) but differed in many important aspects from that Commission's far-sighted recommendations. In part, the differences arose because of the strong historical overlay of the old Workers' Compensation scheme. Legislators of the day bowed to the pressure of the status quo, perpetuating, for example, ideas of private insurance and the efficacy of economic incentives for safety, through the operations of the levy system.

Since the inception of the scheme in 1974 there have been many changes and counter changes to ACC⁴ many of which reflect a tussle with the idea that the scheme is just private insurance dressed up and can be improved by the return to more emphasis on private insurance principles. Politically, this clash of basic principles played out in policy lurches, especially in the 1990s⁵ culminating in 1998 when the work-related part of the scheme was privatised under a National-led coalition government, and then, equally dramatically, reversed in 1999 with the election of a Labour-led government.

³ For example, A one-day ACC Forum: [The future of ACC](#), was held on 26 August 2011 at the Owen Glenn Building, Business School, the University of Auckland, co-hosted by the University of Auckland's Retirement Policy and Research Centre and ACC Group, the ACC Futures Coalition, and AUT's Centre for Occupational Health and Safety Research.

⁴ See for example the Victoria University of Wellington Law Review, 34 (2), 2003 and 35 (4), 2005.

⁵ St John, S. (1999). 'Accident Compensation. A fairer scheme?' in P. Dalziel, J. Boston and S. St John (eds.) Redesigning the Welfare State in New Zealand: Problems Policies Prospects. Auckland, Oxford University Press, pp. 154-176.

Although the privatisation experiment was halted, by 2025 the uniquely advantageous aspects of ACC have been and are being further undermined. The widespread misunderstanding of the role of ACC as social insurance and the nature of the social contract is becoming an especially critical issue as more disabilities such as deafness and stress become compensable to reflect the complexities of a modern working environment. Furthermore, the inequities that arise from treating long-term disability from non-occupational illness far less comprehensively and generously than those “caused” by an accident will continue to put pressure on ACC to expand coverage, again raising issues of the suitability of current funding mechanisms.

Current funding arrangements

Currently the ACC says very little about the purpose of the fund even though it wants the fund ‘purpose to be clear’:

The fund should be clear about its purpose in terms of cash flows, time horizon, tolerable risks and the desire for intergenerational equity.⁶

The build-up of a fund is not a condition of other social provision such as healthcare, education, or pensions. Today’s arrangements of fully funding ACC stem from the implicit assumption that while ACC is run by the state, it is really just like private insurance and should follow the same accounting rules and be funded by levies that are set according to risk classification and adjusted by experience rating to promote both safety incentives and fairness. The problem is that in practice it does neither.

This briefing concentrates on this funding issue, while arguments around intergenerational equity will be further fleshed out by PIE and the ACC Futures Coalition in a second briefing.

In brief, ACC comprises 5 different accounts with different funding arrangements. To get a rough idea of the size of these accounts the following gives an estimate of their share of total 2024/25 revenue of \$6,798million (levies and government contributions).⁷

Account	Revenue share (approx)
Motor Vehicle	483 / 6,798 = ~ 7.1 %
Work	997 / 6,798 = ~ 14.7 %
Earners	2,811 / 6,798 = ~ 41.3 %
Treatment Injury	424 / 6,798 = ~ 6.2 %
Non-Earners	2,082 / 6,798 = ~ 30.6 %

⁶ <https://www.acc.co.nz/about-us/our-investments/investment-beliefs>

⁷ From **Table 28** in ACC’s “Financial Condition Report 2024”, the projected revenue (levies + appropriations) for 2024/25.

The three **major** accounts, the work, earners and non-earners accounts are the focus here.

- **The work account** is comparatively small (14.7%) used for work-related accidents and is funded by an exceedingly complex set of levies differentiated by presumed industry risk.
- **The earners account** (41.3%) is much more significant, pays earnings related compensation for non-work accidents but is funded by a flat rate levy of 1.6%
- **The non earners account** (30.6%) is largely for medical and rehabilitation costs and is funded by a government appropriation

Each year the ACC accounts for itself under accrual accounting rules. It has revenue from levies and government contributions, **and** it has investment income from returns earned on its accumulated funds. These meet the current year's cost of new claims and those that occurred in past years.

Each of the levied sub accounts is supposed to be **fully funded** i.e. have enough in reserves to cover the future costs of the accidents that have already occurred (as gazetted see Appendix 1). This Outstanding Claim Liability (OCL) involves a complex actuarial calculation. Some subaccounts are underfunded, some overfunded. The overall OCL of ACC (2024/25) sits on the Crown balance sheet at \$63.6 billion.

Origins of the requirement to be fully funded

Reserves were always a feature since ACC's inception. In the early years, in the transition from limited coverage under the Worker's Compensation Act, the levies collected had to be higher than the current year's claims as befitting an immature scheme. In the 1970s and 1980s reserves built up and might have plateaued as the scheme matured, but especially in the 1990s, they led to demand for levy reductions. When they were run down again there were cries of insolvency demands for levy rises and perceptions of instability.⁸

The requirement that ACC be 'fully funded' as per private insurance took hold in the early 2000s and was embedded in the Accident Compensation Act 2001⁹ by Labour even though it had reversed National's privatisation of the work account.

Accounting issues

Full funding is expensive with regular actuarial assessments required to measure the outstanding claim liability (OCL) that sits as a giant liability on the Crown balance sheet.

⁸ St John, S. (2010). [ACC: The lessons from history](#) *Policy Quarterly*, Institute of Policy Studies Victoria University of Wellington. 6(2), 23-29.

⁹ This Act came into force on 1 April 2002. The purpose of the Act is set out in Appendix 4.

it is a very complex calculation, very sensitive to the many assumptions made and entails much uncertainty as set out [the Annual Report 2025](#).

ACC is a statutory monopoly with no individual contracts or opt-outs. Applying IFRS-4 accounting standards that apply for private insurance is arguably a category mistake — it imposes private-market discipline on a public social scheme.

Although ACC aims to be fully funded, there is a portion of the OCL that is not required to be- the credit risk premium (see Appendix 1). The new IFRS-17 has led to the recent decision to wipe this portion (\$7 billion) off the OCL. It acknowledges social insurance does not need a credit risk premium.¹⁰

The logic suggests that neither does it need the OCL to sit on the Crown balance sheet just as we do not have an OCL for other major social insurance programmes. Neither is it necessary to report changes in the OCL as a current expense.

The government is already removing the ACC from its deficit measure to make their preferred deficit measure, the OBEGALx, less volatile (see Appendix 2). The OCL likewise should not be reported on the Crown balance sheet because **ACC is social insurance**, analogous to New Zealand Superannuation that is not fully funded, but has reserves (held in the NZSF).

The UK and most of Europe treat injury compensation as part of social security, funded annually. New Zealand is unusual in carrying such a large liability on its balance sheet. It can be argued that the OCL makes the Crown's Net Worth look misleadingly low with implications for fiscal management.

Full funding can make levies more volatile, because OCL jumps when discount rates or actuarial assumptions shift, e.g: small changes in long-term interest rates can add billions to reported liabilities. The OCL is also affected when there is expansion of ACC to cover past events (historic abuse) or possible new coverage (e.g. long covid) to reflect the different needs of the 21st century.

Full funding may discourage the government from expanding entitlements (e.g. better support for sensitive claims), because the liability impact must be recognised upfront as an increase in the OCL expense.

If the requirement to fully-fund was removed, the ACC may still find a ball-park calculation of the OCL is useful. But the OCL would no longer sit on the Crown Balance sheet, nor would the annual changes affect ACC's current budget balance.

¹⁰ According to the article "[Why a Government change reducing ACC's liability by \\$7b will not reduce levies - NZ Herald](#)" (published 22 July 2025), the change involves **removing a 12.7 % risk margin** currently added to the central estimate of the OCL. This reduction of the risk margin is estimated to shave off around NZ\$7 billion from the OCL.

What happens to ACC's reserves?

The reserves are not affected by the decision to abandon the OCL on the Crown's balance sheet and should be managed to enhance the performance of ACC and keep levies stable.

It is noted that 'ACC owns around half of the inflation-indexed bonds that have been issued by the New Zealand Government and other material holdings in New Zealand Government bonds' ([Annual Report 2024](#), p58). ¹¹

The levy system

ACC uses a complex set of risk-related levies to fund the work account- which is around only 15% of funding sources (see above). It is a relic of the pre-ACC days when limited coverage for work accidents was funded by compulsory levies by state insurance, and at times private insurance. It reflects a pervasive view right from the beginning that ACC is just private insurance writ large and needs to adhere to private insurance principles. A major principle of this view is that premiums or levies paid should reflect the risk of the industry.

Industry Risk Levies

Businesses pay *Work levies* based on their safety performance and risk profile. [The ACC levy guidebook](#) takes 148 pages to set out **Industry or classification units and levy risk groups**. Self-employed individuals and employers select a business industry classification (BIC) code based on their primary activity. This five-digit numeric code (CU) groups similar risk industries for levy calculation. Base levies for 2025/26 (see Appendix 3) range from 0.03% (low risk e.g. music publishing) to 2.04% (high risk e.g. solid waste collection) of levied employee income.

Every three years the base levies (both the flat rate and the risk adjusted levies) are reviewed and ACC consults and makes recommendations for future adjustments. This is a very cumbersome process: some of the complexities for the latest round are set out here: [Setting the average ACC levy rates for 2025/26, 2026/27, and 2027/28](#).

¹¹ One estimate is that government debt is around 58% of ACC's reserves of NZ\$48.6bn (as at 30 June 2024). In the consolidated Crown balance sheet these holdings, along with other crown entity holdings are netted off against Crown gross debt in the current Crown net debt measure.

Levy	2024/25 levy rate	Proposed 2025/26 levy rate	Proposed 2026/27 levy rate	Proposed 2027/28 levy rate	Net increase over 3 years
Average Motor Vehicle levy	\$113.94 per vehicle	\$122.84 (+7.8%)	\$131.94 (+7.4%)	\$141.69 (+7.4%)	\$27.75
Earners' levy rate	\$1.39 per \$100 of liable earnings	\$1.45 (+4.3%)	\$1.52 (+4.8%)	\$1.59 (+4.6%)	\$0.20
Average Work levy rate	\$0.63 per \$100 of liable earnings	\$0.66 (+4.8%)	\$0.69 (+4.5%)	\$0.72 (+4.3%)	\$0.09

In the December 2024 round, despite the numerous submissions, Cabinet largely confirmed the levy increases that ACC sought as summarised in the table above (note the rates exclude GST).

Experience Rating

A differential levy system on its own has no built-in incentive for an individual firm to reduce accidents as one firm cannot influence the levy rate itself. Experience Rating (discounts penalties) can award the apparently 'good' behaviour or penalise the unsafe. If levies are not set correctly in the first-place adjustments may arise from misclassification of the firm to a BIC and have nothing to do with safety experience. As highlighted above, the bulk of levy income comes from the earner's flat rate levy and government appropriations for nonearners and vehicle drivers, none of which is clearly risk-related. The self-employed do not sit comfortably in this regime.¹²

Experience Rating (ER) is for larger businesses and provides discounts of up to 50% of the levy or loadings (increases) of up to 100%, based on a businesses' prior relative claims performance compared to their peers. Given that small businesses are excluded and that discounts have exceeded loadings, there has been a degree of cross subsidisation within each business class.

The No Claims Discount (NCD) is for smaller businesses and provides businesses a 10% levy discount or a 10% loading, based on prior weekly compensation and fatal claims. This has long been seen as ineffectual and unfair to those who did not meet the criteria for the discount.

¹² The self-employed pay levies based on risk assessment as if they were employers in a classified group. Including self-employed in the experience rating system is statistically unsound because the work accident record of a single person cannot be compared with the record of a large employer in the same classified group. They cannot obtain a bonus nor should they be penalised. The self-employed should pay the same levy as an employee who has a non-work injury and should not be included in the current levy classification and experience rating systems, if they remain.

A range of [levy-rated technical policy proposals](#) were confirmed by Cabinet in December 2024. Amongst these was the decision to “Remove the No Claims Discount and cross-subsidisation of the Experience Rating framework”. This was an admission that such adjustments to levies failed to have anything to do with safety and were unfair. [The regulatory impact statement](#) highlights that experience rating framework affects only about 30% of work levy payers¹³ and sums it up:

We ...cannot find any policy rationale explaining why the current heavy cross-subsidy for Work Account levy payers covered by the experience rating framework came about and has continued.

Discussion

The work-related part of ACC is based on a complex set of differential levies and classes. These are impossible to justify as an extensive literature exposes.¹⁴ Levies based on ‘risk’ are **not fit for purpose**¹⁵ especially given the inter-dependence of so much economic activity. We all share in the benefits when risks are taken by some and should share in the costs of injury. For example, a desk job in a scaffolding or forestry business depends on other employees taking risks. The protection of homes and businesses may require firefighters or flood rescue workers to take risks. There is wide enjoyment of watching rugby and other high injury sports. Woodhouse saw the interdependence of economic activity justifying a flat rate levy.

Levies on their own, even if risk-related, cannot be described as an incentive to adopt safe practices. Various trials of experience rating to reward and penalise safe and unsafe behaviour, are highly problematic.¹⁶ We already spread the costs of accidents to non-earners and non-work accidents to earners with a flat rate approach. As noted, the work-related accident component funded by risk-related levies is but one small part of the total scheme, and the numbers of those who qualify for Experience Rating is small.

Experience Rating has multiple statistical and measurement issues. The scheme appears to have had no measurable effect on the high accident rates in New Zealand. The impossibly complex system is expensive to run and involves time consuming consultation on any levy changes.

¹³ The 2023 Work Account levy invoices show about 13,000 levy payers qualified for the ER product and 179,000 for NCD, while a clear majority of 463,000 (around 70%) fell outside the experience rating framework.

¹⁴ See for example, St John, S. (2020) [Reflections on the Woodhouse Legacy for the 21st Century](#), 51/2 VUWLR p 293-312; St John, S. (1981). ‘Safety Incentives in the New Zealand Accident Compensation Scheme.’ *New Zealand Economic Papers*, 15; Lamm, F. McDonnell, N., & St John, S. (2012) The Rhetoric versus the Reality: New Zealand’s Experience Rating, *New Zealand Journal of Employment Relations* 38(2):21-40

¹⁵ See for example St John, S (2024) [Ballet dancing is as dangerous as rugby? Or is the complex super structure of levy setting dangerous to much needed 21st century reform of ACC](#), Daily Blog, 24th September
St John, S (2024) [We do not need ACC levy increases](#) Daily Blog, 22th September Rennie, D & St John S (2024) [Should ACC levies be raised?](#) PIE Commentary 2024-6, 20th September

¹⁶ Clauses 328-336 of the Royal Commission Report (1967) rejected the effectiveness of merit rating as a means of improving safety or reducing workplace accidents. It can even have a contrary effect. For obvious reasons, non-work injuries cannot be classified on the basis of risk.

The boundary between work and non-work accidents has become much harder to draw in the modern 'work from home' world. The nexus between work-related and other causes is grey especially with outcomes like occupational disease that may be slow to emerge. Recognition of exposure effects may increase over-time, and more situations demand to be covered including mental health issues from trauma, sensitive claims, and hearing loss.

Furthermore, an accident that happens at a place of work, e.g. the Whakaari (White Island) eruption, AirNZ crash in the Antarctic, may affect many non-employees, (tourists and travellers) but those costs are not attributed to the work activity even when there is clear fault of the workplace operation. Likewise, accidents may arise from unsafe consumer products, such as flammable lounges and cannot be attributed to an industrial activity. Another example is that if a volunteer firefighter is injured, income-related compensation may be payable, but the cost is not attributed to firefighting category because the volunteer is not an employee.¹⁷

The way forward

The idea that the cost of accidents can be attributed in a way that makes differential levies meaningful is long past. Using the Woodhouse principles, ACC should abandon the requirement to fully-fund ACC, the levy system and experience rating. A return to ACC as social insurance would better reflect the principles of administrative simplicity and community responsibility. We all share in the benefits when risks are taken by some and should share in the costs of injury.

A significant simplification is proposed:

- The work account to be funded by a flat rate levy, as is the Earners account. The complex and expensive edifice of levy setting, administration, experience rating, rebates and penalties would be abandoned along with the accredited employer scheme.
- The ACC would maintain their ownership of the current reserves (\$52.1 billion June 2025) to generate income to supplement levies and government appropriations and act as a buffer. They would be set to cover a number of months of current year claims expenses and allowed to fluctuate around an average of 80 months (to reflect current value), before triggering a levy adjustment.

The administrative resources saved should be significant and could be directed to more effective and much needed accident preventative policies. It is important that such a change does not end up with the reserves being rundown and levies reduced. There are huge opportunities given the well-funded nature of ACC. Over time the buffer of ACC's

¹⁷ Helpful discussion on this section with Don Rennie are acknowledged.

large reserves could be managed to extend the coverage of ACC as social insurance to, for example, cover more illness-related disability.

Appendix 1: Funding policy

Funding Policy Statement in Relation to the Funding of ACC's Levied Accounts

Publication Date 6 Apr 2021

In accordance with section 331(3) of the Act, the Accident Compensation Corporation (ACC) must give effect to this statement when recommending the making of regulations prescribing the rates of levies to the Minister for ACC.

- a. ACC must base the aggregate levy rate for a year on the expected lifetime cost of claims in relation to injuries occurring in that year ("expected lifetime cost of claims in the levy year").*
- b. Each Account must target a funding ratio of 100%. The funding ratio is calculated by dividing the assets by the liabilities. The assets are defined as the total assets reported in the annual report less:*
 - payables*
 - accrued liabilities*
 - investment liabilities*
 - provisions*
 - unearned levy liability*
 - and any assets for the accredited employers programme (AEP)*

The liabilities are defined as the balance sheet Outstanding Claims Liability (OCL) but: including:

- off balance sheet work-related gradual process claims not yet made*

and excluding:

- liability for the AEP*
- the OCL risk margin.*

- c. ACC must include an adjustment to the aggregate levy rate that takes the Account's funding ratio to the target defined in b. smoothly over a ten-year horizon. This is to be achieved by setting the adjustment at a fixed proportion of expected lifetime injury costs in the levy year, and for each year over a ten-year horizon.*
- d. Any annual increase to the aggregate levy rate for each Account must not exceed 5% (in addition to inflation adjustments for the Motor Vehicle Account).*
- e. Steps a. to d. are repeated for each levy year in the period for which ACC is recommending levies.*

(Hon CARMEL SEPULONI, Minister for ACC, 10th March 2021)

Appendix 2: OBEGALx

In 2025, the government decided to exclude ACC in its deficit (OBEGAL) measure giving the following justification:

Over the last three years, ACC's deficit before gains and losses rose from \$1.0 billion in 2021/22 and \$2.2 billion in 2022/23 to \$4.1 billion in 2023/24. Its deficit is forecast to average around \$4 billion per annum over the forecast period. This prominence in OBEGAL creates incentives for undesirable, and unnecessary, short-term policy responses. Ministers approve ACC levies and should not be tempted to set levies at higher rates than justified by the scheme's funding policy, simply to improve OBEGAL. Similarly, Ministers should not contemplate raising taxes or reducing spending, either of which would have an enduring impact, to compensate for ACC deficits in pursuit of a short-term OBEGAL intention. Government will therefore use a new measure of OBEGAL excluding ACC revenue and expenses – OBEGALx. (Budget Policy Statement 2025 Box 2).

Appendix 3 Some examples of the work-related levy rates and changes between 2024/25 and 2025/2026

10 Lowest Work-Account Levy Rates (2025/26)

Rank	Classification Unit	Description	Levy Rate (\$ per \$100 of liable earnings)
1	24234	Music Publishing	0.03
2	63300	Office Administrative Services	0.05
3	55110	Hotels and Motels	0.05
4	42109	Road and Bridge Construction	0.06
5	70000	Property Operators	0.06
6	69320	Accounting Services	0.07
7	60100	Rail Transport	0.07
8	66190	Other Auxiliary Finance and Insurance Services	0.08
9	95110	Automotive Electrical Services	0.08
10	60200	Water Transport	0.09

10 Highest Work-Account Levy Rates (2025/26)

Rank	Classification Unit	Description	Levy Rate (\$ per \$100 of liable earnings)
1	96350	Solid Waste Collection Services	2.04
2	03020	Longline Fishing	1.99
3	04200	Logging	1.96
4	42101	Road Construction	1.84
5	10900	Meat and Meat Product Manufacturing	1.73
6	03010	Line Fishing	1.71
7	29210	Automotive Repair and Maintenance	1.64
8	05200	Coal Mining	1.58
9	29220	Smash Repair Workshops	1.55
10	03040	Crustacean Trawling	1.52

- **Lowest rate:** \$0.03 per \$100 of earnings (Music Publishing).
- **Highest rate:** \$2.04 per \$100 of earnings (Solid Waste Collection).
- **Average Work Account rate:** \$0.66 per \$100 (across all industries).

(see ACC's consultation baseline table for 2025/26, which Treasury and MBIE later confirmed in the final levy regulations.)

Some low-risk sectors (e.g., music publishing) saw **reductions** in their levy rates in 2025/26.

Some higher-risk sectors (e.g., waste collection) saw **increases**.

The **average** Work-Account levy rose from **\$0.63 per \$100** in 2024/25 to **\$0.66 per \$100** in 2025/26. [MBIE+2ACC+2](#)

The changes reflect ACC's effort to better align the levy rates with claim-experience and risk classification.

Appendix 4 The **Purpose of the Accident Compensation Act 2001 (2023 version)**

The purpose of this Act is to enhance the public good and reinforce the social contract represented by the first accident compensation scheme by providing for a fair and sustainable scheme for managing personal injury that has, as its overriding goals, minimising both the overall incidence of injury in the community, and the impact of injury on the community (including economic, social, and personal costs), through—

(a) establishing as a primary function of the Corporation the promotion of measures to reduce the incidence and severity of personal injury:

(b) providing for a framework for the collection, co-ordination, and analysis of injury-related information:

(ba) ensuring that the Corporation monitors access to the accident compensation scheme by Māori and identified population groups in order to deliver services under this Act in a manner that supports access to the scheme by injured Māori and injured persons in those population groups:

Section 3(ba): inserted, on 7 June 2023, by section 4 of the Accident Compensation (Access Reporting and Other Matters) Amendment Act 2023 (2023 No 26)

(c) ensuring that, where injuries occur, the Corporation's primary focus should be on rehabilitation with the goal of achieving an appropriate quality of life through the provision of entitlements that restores to the maximum practicable extent a claimant's health, independence, and participation:

(d) ensuring that, during their rehabilitation, claimants receive fair compensation for loss from injury, including fair determination of weekly compensation and, where appropriate, lump sums for permanent impairment:

(e) ensuring positive claimant interactions with the Corporation through the development and operation of a Code of ACC Claimants' Rights:

(f) ensuring that persons who suffered personal injuries before the commencement of this Act continue to receive entitlements where appropriate.