

McGuinness Institute Submission

Environment (Disestablishment of Ministry for the Environment) Amendment Bill

11 March 2026 (updated 27 March 2026)

1.0 Introduction

The McGuinness Institute (the Institute) welcomes the opportunity to submit on the proposed Environment (Disestablishment of Ministry for the Environment) Amendment Bill, referred to as the Bill. We thank the Environment Select Committee (the Committee) for inviting feedback on this Bill which proposes to have significant impact on New Zealand policy.

The Institute understands the need for improving New Zealand's environmental policy, however, it opposes the Bill in its current form. The Bill proposes disestablishment of the Ministry for the Environment (MfE) to instead create a large 'mega-ministry' which also includes housing, transport and economic growth. The Institute is concerned the Bill:

- leads to inconsistency, uncertainty, inefficiency and increased costs
- creates significant risks for the public and private sector
- removes critical statutory protection for the environment
- lacks evidence of where 'mega-ministries' have worked internationally
- fails to show how the Bill will result in increased environmental protection
- focuses on the short-term, meaning long-term environmental policy will lose out in favour of short-term economic gains
- relies on internal decision-making within the 'mega-ministry,' which creates conflicts of interest and lacks public engagement
- risks creating a concentration of powers without adequate checks and balances, and
- weakens independent, transparent oversight in environmental legislation.

The Bill is not improving the existing environmental legislation system based on an agreed 'problem definition' but instead is redesigning the system completely, and in haste. It is unclear who would benefit from disestablishing the MfE and why this Bill is being pushed through with only two and a half weeks of public consultation.

The MfE has been in operation since 1986 when the Environment Act 1986 established the Ministry for the Environment and the Office of the Parliamentary Commissioner for the Environment (Commissioner).¹ Independent ministries make a difference. MfE operates for a purpose: provide a logical balance to development-based ministries.

The Institute recommends the MfE is not disestablished, as it provides a critical voice for the environment in New Zealand's public policy ecosystem. Instead, the Institute recommends more detailed research is undertaken, including consultation with key stakeholders, to understand what the issues are and the best policy to solve them. It is very concerning that the Bill intends to create a planning environment focused only on the economy, failing to consider the importance of the environment, the community, Māori, and long-term impacts of public policy decisions.

The proposed Bill does not appear to encourage the kind of discussion required to achieve a durable, longterm solution, one that provides business certainty and environmental sustainability.

And instead of creating a collaborative path forward, it seems to intensify the opposing positions of each group.

The Institute recommends the Bill is not passed.

We would welcome the opportunity to speak before the committee.

2.0 Background

We need to implement a solid planning and natural environment regime *now*, to prevent leaving significant issues for future generations. New Zealand's international reputation and trade relationships are also at serious risk if we continue to go backwards in our climate change policy. This has serious risks for both human safety and environmental health.

Two seismic policy shifts in the Bill

From our perspective, the Bill works together with other policy changes to represent two seismic shifts in New Zealand's planning regime:

1. A shift away from resource management and protecting the natural environment towards economic development, and
2. A shift away from public interests, public consultation, community involvement, and the recognition of cultural values, to the values and interests of the commercial and the private sector.

The current policy ecosystem (with a number of separate ministries, including the MfE) has been designed for all New Zealanders, current and future, whereas the proposed system is designed for a small number of parties, focused on meeting their short-term interests. Further, many of those who will benefit from this Bill are not New Zealand companies or New Zealand residents. For this reason, a cautious and considered approach is required.

To build the economy, and society as a whole, the Institute believes new resource management policy should focus on the following three benefits:

1. Certainty for business and citizens

The proposals are so extreme (compared with past policies) that it is highly likely another government will come into power (whether in an election this year or in the future) and bring the MfE (or a similar ministry) back into action. Extreme changes in public policy are always problematic and expensive. The Institute recommends a lighter touch, one that delivers good outcomes for all New Zealanders and lasts the distance.

2. A strategic approach

The Institute recommends encouraging bottom-up dialogues between citizens, employees, businesses and councils. There are bound to be numerous nuances at a local level, so a local plan, based on hearing a range of different voices, is likely to lead to more stable, durable and effective outcomes. Detailed analysis is required to understand how MfE is benefitting (or harming) local communities, and how public policy can improve the outcomes for New Zealanders.

3. A non-partisan approach

The Institute believes resource management policy should, at the very least, be developed through a non-partisan approach with dialogue between many political parties. For example, even agreed goals with disagreement over how to bring about change would be more beneficial than disagreement over goals and actions. It would be hard to find a New Zealander who does not want to protect our environment for future generations. In this context, abruptly removing the MfE does not make any sense.

To summarise, the Institute considers the Government should not go through with the proposed Bill as it is written.

3.0 Responses to the Bill

It is important to consider all costs involved when deciding on public policy changes, especially ones as extreme as disestablishing a ministry that has existed since 1986. An assessment of this Bill should include community and cultural costs, environmental and climate costs, economic costs, and the costs of such a fast change. Some costs, for instance losing access to clean and safe drinking water, are more important than others, even if they are less tangible economically.

Some costs may be suffered in the long term (e.g. loss of freshwater habitats means the loss of lakes and rivers where previous generations swam and fished), and that will make it difficult to balance them against short-term costs experienced at present. We are concerned the Bill prioritises short-term, economic impacts above long-term, less quantifiable (but potentially more important) impacts.

The Institute is concerned the Bill lacks consideration of key factors (including climate change, the biodiversity crisis, environmental issues, animal welfare, and a variety of other impacts that the primary sector has on species and ecosystems).

3.1 Concerns with the Bill

Below is the Institute's response to serious issues with the Bill and some initial brief recommendations on what should be included in any new Bill. Note, because of time constraints, this list is not extensive. We would appreciate more time to undertake a detailed analysis of concerns and how they could be resolved.

1. The Bill fails to help mitigate carbon emissions and protect New Zealand from the changing climate

As explained in *Appendix 2: the context*, the impacts of climate change are increasing, with extreme weather and natural disasters causing loss of life and property across the country. One recent example is the Mt Maunganui landslide in February 2026, when six people tragically died at a campground after a section of the maunga collapsed as a result of an extreme weather event.²

Any change to public policy in 2026 is a chance to help influence how we respond to the climate emergency by both mitigating emissions and integrating plans for climate adaptation.

The Institute recommends the Bill should:

- include the climate impacts of activities as part of planning
- integrate with New Zealand's 2050 target, Emissions Reductions Plans and international climate commitments
- outline climate adaptation and planning for extreme weather and natural disasters such as sea level rise and wildfires.

2. The Bill fails to protect New Zealand's unique biodiversity

New Zealand has the highest proportion of threatened species anywhere in the world.³ Once these species are lost, we cannot get them back. At this stage we do not know how vulnerable our flora and fauna will be to the impacts of climate change (including temperature, humidity, extreme weather, etc). Regular monitoring and research will be essential going forward, with climate change directly impacting where our baselines will sit.

3. The Bill creates inconsistencies which will lead to waste, litigation and inefficiency

Certainty is a key part of efficient law, and this Bill does not have clear definitions and details.

It is extremely important for government to ensure public funds are spent well. This means investing in areas that provide long-term benefits for New Zealanders, protecting our natural environment resources and creating stable and reliable markets for business. Change costs money, and we are concerned the MfE will be removed only to have it reinstated by another government. This is inefficient and expensive for New Zealanders, focusing on extreme, short-term political wins at the expense of long-term goals.

4. The Bill does not give a sufficient plan for protection of our oceans, freshwater systems, and other critical ecosystems

The Institute is concerned that the Bill will likely allow for more, and easier, commercial fishing and aquaculture, which is likely to negatively impact indigenous biodiversity and our ocean ecosystems.

The ocean is a public resource, used by New Zealanders for recreation, and it should be preserved for future generations. Part of this is that the ocean should be freely accessible to the public rather than used for private profit. Further, a number of New Zealand's marine species are threatened, or near extinction, and allowing more commercial and aquaculture activities will damage already fragile ocean ecosystems. The changing climate and warming oceans also mean that aquaculture and other activities are far less likely to be commercially viable in the future. This is already happening with salmon farming in the Marlborough Sounds.

The Bill should ensure strong protection for our freshwater systems, as well. A 2020 government report found nearly 60% of New Zealand's rivers carry pollution above acceptable levels, with 95–99% of rivers in pastoral, urban and non-native forested areas contaminated.⁴ This is despite our freshwater systems being critical for human and environmental health, and a public asset that we all rely on to survive.

Water will be critically important given the impacts of climate change on the quality and quantity of freshwater. Sources, including rivers and lakes, must have a certain level of ecosystem health in order to produce safe drinking water for the country. If the health of some of our waterways starts to decline or our waterways are contaminated, it will be very difficult to prevent the impacts spreading. Once our freshwater systems are contaminated it is hard, potentially

impossible, to return them to health. For these reasons, water must be protected through our legislation and it must remain part of the public estate.

The Institute has a research project called *WaterFuturesNZ*, which aims to contribute to the wider discussion on how we might design safe, accessible and reliable water services for Aotearoa New Zealand. The Institute recognises that water is a significant public asset and it should be safe and free for all. The Office of the Auditor General's work in this area contains the wider context on why protecting our water systems is critical for New Zealanders:

To manage water resources, public organisations in central and local government need to work in the short and long term with competing interests, often with limited information and resourcing. These challenges will become only more difficult as climate change and other pressures on our water resources become more significant.

The management of the country's water resources is of deep significance and concern to New Zealanders. People expect the water from their taps to be clean and safe, wastewater and stormwater to not pollute the environment, and our rivers, lakes, and oceans to be healthy ecosystems that are safe to swim in and to gather kai moana from. Failure to meet these expectations can cause lasting damage to the public's trust and confidence in public organisations.⁵

Freshwater reform is an area of critical importance to the future of our public health and economy, hence the Institute has decided to engage heavily in this area. It is important that policy is carefully designed so we have an integrated, forward-looking water protection system. It is critical to note that water will become increasingly in demand as the world becomes more populated and challenged by climate change. As well as this, our freshwater systems are home to a number of endangered flora and fauna.

MfE's 2025 report *New Zealand's Environmental Reporting Series: Our environment 2025 | Tō tātou taiao* summarises the impact of human behaviour on our freshwater quality:

- Contaminants from human activities on land can affect freshwater habitats and species.
- Poor water quality, low oxygen levels and warm temperatures can allow toxic concentrations of *Clostridium botulinum* bacteria to build up in freshwater bodies. This has led to botulism outbreaks that have killed hundreds of freshwater fish and birds, including native and threatened species (BirdCare Aotearoa, 2022; Kāpiti Coast District Council, 2024; MPI, 2023e; Waikato Regional Council, 2023).
- Heavy metals in high concentrations can be toxic to aquatic life. They can accumulate in sediments and living organisms (Boehler et al, 2017).
- Kākahī habitat decline has been attributed to river regulation, nutrient enrichment and other types of pollution (Phillips, 2007).
- Microplastics have been found to accumulate in freshwater organisms. These can cause impacts depending on their physical shape and size, age, density and chemical make-up (Ockenden et al, 2021, 2022; Zimmermann et al, 2020).⁶

Looking at the wider context, understanding how critical our freshwater systems are and how much pressure they are under, it is disappointing the Bill does not include a more strategic and integrated approach to water management in New Zealand. We need a coordinated approach that looks at how we can protect water quality for the long term.

Greater flexibility is likely to result in lower environmental standards, due in part to shifting baselines over time, meaning lower environmental standards go unnoticed.

‘Shifting baseline syndrome’ refers to the lowering in expectations of environmental standards over time, which occurs over generations. Each generation believes what they grew up with is the ‘standard baseline’ for environmental limits; however, these baselines are in fact declining significantly over time.⁷ Examples include the changes in fishing and kai moana gathering across generations: what our grandparents could catch was far more than we can, and our children will have even less. An unfortunate fact is also that once limits are exceeded, or species are extinct, these changes are often irreversible.

One way to prevent this gradual ecosystem decline is by implementing scientific standards and monitoring them over time, making changes to ensure they cannot decline. In this context, the community will be able to protect the environment for future generations. We therefore recommend implementing scientific limits and monitoring these regularly, adapting to any changes. This approach, rather than adding ‘flexibility’, will have much greater benefits for freshwater management now and into the future.

The Institute also questions what the Bill actually intends to achieve and whether it reflects the values of New Zealanders, who place a significant cultural, economic and environmental value on having free access to clean, pristine freshwater. Note that page 12 of the *Freshwater Discussion Document* states that:

Currently, the NPS-FM’s [National Policy Statement for Freshwater Management’s] sole objective sets out a hierarchy of obligations to ensure that natural and physical resources are managed in a way that prioritises:

- first, the health and well-being of water bodies and freshwater ecosystems
- second, the health needs of people (such as drinking water)
- third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

The Government is concerned this hierarchy is currently being interpreted as requiring pristine water quality to be achieved, before allowing any other uses of freshwater. This is not consistent with the Government’s intention for how the NPS-FM should be applied. [bold added]⁸

We are concerned that the way this Bill attempts to balance multiple objectives will result in shifting environmental baselines and will not protect our freshwater systems over the long term.

The wider context of our freshwater systems should also be considered. MfE’s 2023 freshwater report paints a picture of a country with extremely stressed systems that need policy protection:

While some of our freshwater bodies are in a reasonably healthy state, many have been degraded by the effects of excess nutrients, pathogens, and other contaminants from land.

Most of our indigenous freshwater fish and freshwater bird species, including some taonga (treasured) species, are either threatened with extinction or at risk of becoming threatened. The effects of our historic and contemporary activities on our freshwater environment have impacts on many of the things we value as individuals, communities, and as a nation, such as our iconic and taonga species and being able to swim and practice mahinga kai without risk of illness.⁹

There is an opportunity here to improve New Zealand’s resource management system to reflect the value New Zealanders place on freshwater. We recommend the proposals are updated to protect freshwater for future generations by implementing clear and consistent standards and monitoring systems.

This is of high concern, as there is a risk that economic factors will outweigh other considerations (including scientific and environmental ones). This is especially likely as short-term economic factors can easily be quantified, and long-term factors are difficult to quantify and thus very hard to compare.

This change in objectives also gives councils a high level of discretion to focus on short-term economic growth at the expense of long-term freshwater protection. This level of discretion comes without independent checks and balances.

It is relevant to note the Inquiry into the Havelock North water-borne outbreak of *Campylobacter* infection in 2016 concluded the resource management rules in New Zealand must 'be amended to expressly recognise the protection and management of drinking water sources as a matter of national importance'.¹⁰

The Institute is concerned that a change in objectives will result in a lower level of environmental protection for freshwater, as it will allow economic growth to potentially outweigh the health of our waterways. This is a short-term focus, as over the long term, having healthy waterways will result in a much better quality of life for New Zealanders.

The Institute recommends the Bill should:

- be amended to elevate the protection and management of freshwater sources as a matter of national importance
- be amended to detail special protection for our ocean space, including environmental baselines that must be upheld
- introduce regulated restrictions on any freshwater and marine pollution
- establish guidelines for monitoring, compliance and legal consequences for breaches
- set clear, scientific human health and ecosystem limits based purely on science rather than economic factors
- require that these limits are regularly monitored, with serious legal consequences where limits are breached.

5. The Bill should protect critical ecosystems such as wetlands

The Institute would like to see detailed analysis in order to understand the environmental benefits and the impacts the proposed Bill will have on protection for key ecosystems such as wetlands. We note that wetlands are rare and at-risk ecosystems which have significant environmental and climate benefits for the country (and the world).

Wetlands are especially beneficial as they absorb significant amounts of carbon; however, only a very small proportion of New Zealand's remain. Once covering large areas of Aotearoa, over 90% of our wetlands have been destroyed in the last 150 years (primarily replaced by grasslands to allow for dairy farming).¹¹

MfE's 2025 report summarises the significance of wetlands well:

New Zealand has lost an estimated 90 percent of historical wetland (repo) area, but the small fraction that remains is vital for the survival of many threatened plant and animal species, including several treasured (taonga) bird species.¹²

Wetlands are delicate ecosystems that are home to native flora and fauna, and are essential in New Zealand's work against climate change, with healthy wetlands locking up to 5 tonnes of carbon per hectare.¹³

It is critical we protect the few remaining carbon sinks left, and for this reason we suggest a precautionary principle is used here.

The Institute recommends the Bill should:

- be amended to elevate the protection and management of wetlands as a matter of national importance.

6. The Bill fails to respect kaitiakitanga and Te Tiriti o Waitangi and fails to support Māori participation

The Institute acknowledges Māori have a critical role as tangata whenua in Aotearoa and that we do not purport to represent or account for those perspectives in this work. The perspectives of Māori communities must be considered in resource management, particularly regarding how to preserve traditional practices such as gathering kai moana.

The Bill's narrow approach to Te Tiriti o Waitangi does not uphold the Crown's obligations under the Treaty. This Bill also fails to incorporate a strategic support for Māori engagement with New Zealand's environmental protection.

The Institute recommends the Bill should:

- include requirements for partnership, active protection, rangatiratanga and the exercise of kaitiakitanga
- actively support Māori consultation and participation.

7. The Bill should protect environmental limits

Maintaining, monitoring and protecting environmental limits is an important purpose of any environmental legislation in New Zealand.

The Institute recommends the Bill should:

- be amended to elevate the protection of environmental limits as a matter of national importance.

4.0 General recommendations

1. If it is passed, monitor, evaluate, and require regular feedback loops to ensure the Bill remains fit for purpose

It is critical to review policy regularly to ensure it is working as intended. Consistent reviews will help to build intelligence on what works and what does not. These reviews should analyse impacts from the perspectives of communities, businesses and scientists. For instance, improved technology may help improve how environmental baselines are measured. If we can improve our environmental monitoring, we can adapt faster to any breaches of limits to protect our environment from pollution or other issues.

It is also important these reviews are publicly available to ensure the regime is accountable and transparent.

We recommend that the legislation includes periodic reviews of how this regime is working, including analysis of the short-, medium- and long-term impacts. This should include monitoring uptake, quality, costs, usability, unintended consequences, and other issues that impact the environment, economy, community and other factors.

3. Analyse other alternatives

The Institute recommends that other alternatives should be explored – there is likely to be a solution that works better for our communities, the environment and the economy.

This Bill will directly impact the New Zealand that is here in the short, medium and long term. The Institute would love to see some analysis of the environmental policy regimes in other similar countries to understand how they balance economic and other factors.

4. Encourage reducing emissions and protecting our environment to save New Zealand money

The proposed Bill fails to encourage emissions reduction, losing out on potential economic benefits if New Zealand reduces our emissions and protects our environment.

Reducing our emissions will mean we do not have to purchase as many offshore credits to meet our international commitments (see *Appendix 2: The context*).

Under the Paris Agreement, New Zealand's NDC means we have committed as a country to reducing net greenhouse gas emissions to 50% below gross 2005 levels by 2030 to support the international community's efforts to reduce the impact of climate change.¹⁴ The NDC is reliant on purchasing approximately 100 million tonnes of CO₂-equivalent offshore carbon credits to meet the target (a cost the Treasury estimates could come in anywhere between \$NZ3 billion and 23 billion).¹⁵ Relying on international carbon credits is expensive and risky.

This Bill should have a focus on climate change, as letting climate issues fall by the wayside will only hinder the country's chances to reduce these costs and commitments. It will also increase uncertainty, making it more difficult to produce effective and cost-efficient long-term plans and strategies around climate change. This is explained in more detail in point 5 below.

For a more detailed discussion on this recommendation, refer to the Institute's *Discussion Paper 2024/01 – Risks Hiding in Plain Sight: Does a commitment under the Paris Agreement to purchase offshore carbon credits create a requirement to report that commitment in the financial statements of the New Zealand Government?*¹⁶

5. Require climate impacts and transition strategies to form a key part of the reforms

New Zealand's environment is under significant pressure and there is an urgent need to adapt to climate change as well as to reduce carbon emissions to prevent further environmental degradation. Climate change is one of the most serious risks facing New Zealand and it should be an important part of any regime, especially the current Bill, which attempt to set a framework

for the future of New Zealand. The extreme, and increasing, impacts of climate change are detailed in *Appendix 2: The context*.

Making decisions in the name of economic prosperity today, with a substantial risk of creating an economic burden later on, is irresponsible to future generations. Further, the lack of consideration of climate change in these proposals undermines New Zealand's investment and commitment to climate mitigation and adaptation strategies.

This Bill lacks detail on how it will protect New Zealand's environment and biodiversity from the impacts of the changing climate. For instance, warming temperatures and natural disasters will mean species' habitats need to change, and some areas may need to operate in different ways than they have in the past. An example of this is marine life shifting to new habitats as oceans warm, which will mean activities such as aquaculture will also need to go to different locations.

The Institute recommends the Bill should include:

- detail on how the regime will respond to a changing climate
- plans for how the regime will help slow the impacts of climate change and encourage climate-friendly planning
- plans to encourage emissions reduction, and
- plans for how to mitigate and respond to the impacts of the changing climate.

6. Require whole-of-government strategies on (i) infrastructure and development, (ii) primary industry, (iii) environment and ecosystems and (iv) freshwater to be prepared and reviewed every five years, with subsequent reports and strategies to be tabled in the House

Legislation is central to regulation, and regular reviews will ensure it is working as intended. No Bills work in isolation; they work alongside different government department strategies.

The Institute started a *GDS Index* research project in 2014 and it has been regularly updated ever since. The *Government Department Strategies Index Handbook – He Puna Rautaki* ranks each government department strategy (GDS) in terms of essential information. The *GDS Index* aims to illustrate how New Zealand might strengthen GDSs to be more effective, responsive, measurable, comparable and durable through public consultation, engagement and ownership.¹⁷ However, the 2024 *GDS Index* found only 16% of GDSs in operation (32 out of 195) were required or referred to in legislation.¹⁸ Page 12 of the Institute's 2024 *GDS Index Methodology* contains a list of these 32 GDSs.¹⁹

Requiring in law that a strategy be published is a useful mechanism for Parliament to ensure strategies are developed, consulted upon and made public. In 2023, the Institute raised the issue of whether such GDSs might come under the governance of Ministry for Regulation (MFR). MFR has advised that it does not have a stewardship role for all GDSs, but has an interest, as a consumer, in specific GDSs during its reviews of where regulatory failures might exist. See also our submission on the Regulatory Standards Bill on the [Institute website](#).

It is recommended that more GDSs be mandated by law to ensure a higher level of due diligence, ownership, durability and accountability. The Institute believes this is a governance issue for the Minister for the Public Service and the Minister for Regulation.

If government departments make the content of GDSs more transparent, Ministers, officials and the wider public will be better able to assess their quality and, where appropriate, work together to deliver better outcomes more cost-effectively.

7. More checks and balances are needed to prevent any significant ‘unchecked power’

We need to ensure that decisions are made in a transparent manner, and that there are no backhanders or other actions where the Minister (or associates) benefit at the expense of the communities and the environment. The demand on resources will continue to be problematic and we need to future proof the system from bad actors operating in ways that are not in the public’s interest.

8. Financial and reputational penalties require more consideration

Given the risks of Ministers, businesses, and other parties, acting illegally or immorally or in their own self-interest, strong and public penalties are required. The Institute recommends penalties for acting against the way the law was intended to operate should be included in the legislation.

Any unethical behaviour or breaches should result in public penalties, scaled in such a way as to prevent repeat poor behaviour. For instance, businesses who breach consent conditions should be required to publish, in their annual report, actions for which they have been penalised. Public transparency is a critical part of democracy.

9. Establish stronger baseline data and monitoring to maintain environmental limits

The Institute has repeatedly stated that New Zealand lacks adequate baseline environmental data for our environment and ecosystems. Without this information, sound environmental management is impossible.

Institute recommendations to improve this include:

- Require comprehensive baseline studies before approving new activities.
- Mandate ongoing ecological monitoring of flora and fauna.
- Increase publicly accessible environmental reporting.

10. Produce updated research on the value of New Zealand’s environment and reputation

This Bill attempts to balance economic, cultural and natural values. This is very difficult when only economic values can be quantified. To improve this process, we recommend economic analysis is regularly taken to quantify other values, such as a clean environment, flora and fauna existing for future generations, natural environments that allow for tourism and recreation, or pristine drinking water. This will obviously not be straightforward; however, the exercise may help decision-makers understand and quantify some intangible values when making resource management decisions.

New Zealand’s clean, green international brand is critical for our economic wealth. However, we need to understand what it is worth and the actions we can take to optimise that net worth. Equally, we need to know the actions we should avoid taking as they will reduce it. In 2001, MfE prepared a report on this, *Valuing our Clean Green Image*.

A supporting report answered the following question: *Our clean green image: What's it worth?* This is what the research found:

Dairy sector

If New Zealand's environment was perceived as being degraded, on average consumers surveyed would purchase 54% less consumer products. The actual loss in revenue would depend on how much of the lost product could be redirected to products and markets where environmental image plays a less important role, so the potential annual loss would vary between:

- \$241 million (all lost product redirected), and
- \$569 million (none of the lost product redirected).

Tourism

The extent of change in purchasing behaviour (measured by change in length of stay) varied by country. Under worsened environmental perceptions, tourists in New Zealand would alter their stay by an average of, for example:

- Australia – 48% reduction
- Japan – 79% reduction
- Korea – 77% reduction.

The annual loss to New Zealand from the five markets covered in the survey of tourists would be between NZ\$530 million and NZ\$938 million (depending on whether lost wages and GST effects are taken into account).

Organic produce

Buyers were presented with two scenarios: New Zealand allowing (a) limited field test of GM crops for research and (b) uncontrolled releases of GM crops. In the short term New Zealand's organic sector would not be affected by allowing field tests of GM crops for research, although in the long term buyers would probably shift to other sources. Adopting a policy of uncontrolled release would see New Zealand almost certainly suffer immediate losses, with buyers either stopping or substantially decreasing purchases.²⁰

Before this government implements changes to the RMA system, it is critically important that it takes the time to ensure risks are calculated, interconnections are explored (such as second- and third-level effects), and where possible, risks are managed. It is now 24 years since New Zealand last attempted to value its clean, green brand. It seems overdue to revisit and answer this important question so that decisions are made on complete information. Updating the 2001 report will allow New Zealand to place a number on our biodiversity and clean environment.

11. The Bill fails to consider New Zealand's international commitments, which will have negative impacts on New Zealand's trade agreements, international commitments and reputation.

New Zealand is party to a number of international agreements committing us to reducing our emissions and working to help mitigate climate change. It is important we stand by these agreements to maintain our international relationships and trade reputation built on the 'clean, green' image of our exports.

As they are written, the proposed Bill fails to integrate the principles of the international commitments New Zealand has made. This will have serious risks for our trade agreements, reputation and our economy.

Recent international criticism of New Zealand's backward shift in emissions targets at COP30 reflects the importance of acting now to reduce emissions, comply with our commitments, and maintain our international reputation and trade relationships.²¹ Earlier this year, our trading

partners, including the UK, raised concerns over the decline in New Zealand's climate policies again. The UK's views on our climate change policies are especially important to the economy as New Zealand's trade with the UK depends upon our climate commitments and is worth \$1 billion per year to New Zealand.²²

Our international commitments are increasingly being included in New Zealand's trade agreements – complying with them is critical for trade, which is essential for our economy. For example, Article 3 of the Free Trade Agreement with the EU, signed on 9 July 2023, states that a party has an obligation to refrain from any action or omission that materially defeats the object and purpose of the Paris Agreement.

The relevant details of our international commitments are explained in more detail in *Appendix 2: The context*.

The Institute recommends that this Bill is rewritten to reflect New Zealand's international commitments.

12. There is a need for transparency on the use of AI

It is unclear how AI will be used in this submission process.

The Institute recently prepared and published *Think Piece 43 – Unlocking Government documents with AI*.²³ Based on this work, we learned a great deal about the risks and opportunities of applying artificial intelligence (AI) in a government setting. Given these insights, the Institute now has a policy of requesting every organisation to:

- clarify how AI is expected to be used to analyse and report on public submissions when inviting submissions from the public, and
- prepare a public report on how AI was used to collate ideas and present the report to decision-makers when writing up submissions from the public.

Key information in both cases should include:

- (i) the AI tool (such as Google NotebookLM)
- (ii) the number of submissions that were read in full or in part by a human versus those that were only read by AI
- (iii) how the AI results were verified as correct (i.e. the audit process), and
- (iv) a summary of the errors found as a result of the review process.

Furthermore, AI should be used for the benefits of citizens and submission processes should be reconsidered given this new tool.

4.1 Further unanswered questions

The Bill leaves many questions unanswered, including:

1. Problem definition: What is the problem the Bill is trying to solve? The problem needs to be specific and measurable, so that results can be compared over time. What does success look like?
2. Strategic options: Was some part of the system working/not working? What are New Zealand's international trading partners doing in this space? What is working and what is not? How are other countries balancing economic, environmental and community needs?
3. Costs: What are the costs of these reforms? Can costs be reduced? Can some parts of the existing system be retained to save costs? Who bears the costs?
4. Timing: How will these proposals be monitored and measured? When? Why is this being pushed through in haste? How will that benefit the objective?
5. Reviews: Are review clauses in place? When will the results of this experiment be able to be tested and reviewed?
6. Adaptability: How will this Bill pivot with changes in technology and changes in the environment?

5.0 Conclusion

A significant amount of policy work, consultation, scientific research, economic analysis, and community and environmental research is required before this Bill achieves any benefits for New Zealand.

The proposed Bill has come at a time when the country is at a critical crossroads in terms of our international reputation, trade and climate impacts. The Institute agrees it is time to improve the sustainability and efficiency of New Zealand's planning and environmental legislation. However, there is not sufficient evidence that removing the MfE will help achieve the promised benefits for New Zealand.

The Bill will have significant, possibly irreversible, implications for our communities, economy and natural environment (especially our oceans and freshwater systems, and the species that live within them). As such, there is a concerning lack of analysis, scientific evidence, research and examples of international best practice on how to design public policy that balances these different needs.

New Zealand has an opportunity that many countries do not have: we are proud of our unique environment with precious flora and fauna, geographic isolation, strong connection with the land and ocean, uniquely special environment and Treaty obligations – and we have high-quality exports that profit from our clean, premium, sustainable brand. Our environmental management is a key part of our health and safety as well as our economy. The Bill does not reflect the complexities of protecting ecosystems in a way that empowers a country with our unique values and characteristics. Our environment needs a voice in public policy, and the MfE is a critical mechanism to protect the environment.

We want to be responsible stewards for the next generation, which includes maintaining healthy freshwater and ocean systems. These proposals fall short and do not allow for the long-term planning required in order to protect our environment for future generations. The Institute, and

many others, have undertaken a significant amount of work to ensure New Zealand's public policy safeguards the environment for future generations.

As currently written, this Bill has a way to go before it presents a balanced approach to protecting our unique ecosystems in the face of current challenges. The Institute recommends the Bill is not passed.

Appendix 1: About the McGuinness Institute

The Institute was founded in 2004 as a non-partisan think tank working towards a sustainable future for Aotearoa New Zealand. Project 2058 is the Institute's flagship project focusing on Aotearoa New Zealand's long-term future. Our observation that foresight drives strategy, strategy requires reporting, and reporting shapes foresight, led us to develop three interlinking policy projects: *ForesightNZ*, *StrategyNZ* and *ReportingNZ*. All three must align if we want Aotearoa New Zealand to develop durable, robust and forward-looking public policies.

The policy projects frame and feed into our research projects, which address a range of significant issues facing Aotearoa New Zealand. The 13 research projects are: *BiodiversityNZ*, *CivicsNZ*, *ClimateChangeNZ*, *ForesightNZ*, *OneOceanNZ*, *PandemicNZ*, *PublicScienceNZ*, *ReportingNZ*, *SecurityNZ*, *StrategyNZ*, *TacklingPovertyNZ*, *TalentNZ* and *WaterFuturesNZ*.

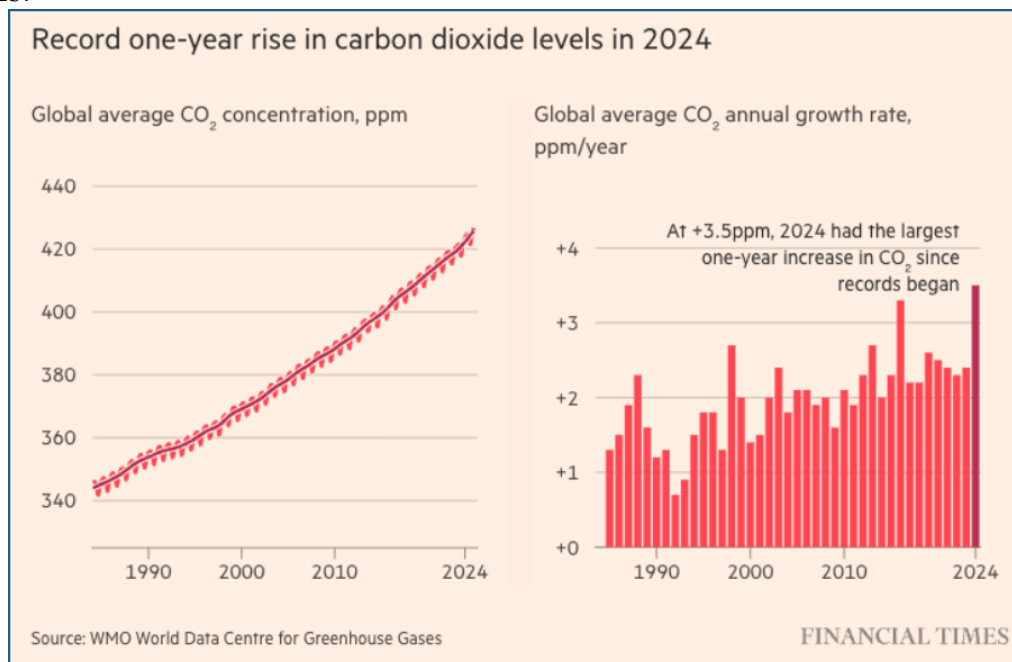
Appendix 2: The context

Level of emissions and climate change is unprecedented

The intensifying global transition to low-emission technologies, along with increases in defence spending, are driving a substantial increase in demand for critical minerals such as lithium, cobalt, and other rare earth elements. This surge is resulting in both supply-chain vulnerabilities and pricing volatility, with implications for industries reliant on clean energy infrastructure. Simultaneously, the growing frequency and severity of climate-related events are contributing to population displacement and heightened immigration pressures.

Recent research shows that atmospheric carbon dioxide concentration in 2024 was the largest one-year increase since records began in 1957 (see graphs below using data from *WMO World Data Centre for Greenhouse Gases*).²⁴

Source: Financial Times, *Extreme heat events rise in decade since Paris accord as CO₂ stays at record, studies say*, 2025.²⁵



Recent examples of the costs of the changing climate include:

- ‘In July [2025], Pakistan saw record-breaking heat, with temperatures in Chilas, in the mountains, 48.5C, which may have contributed to the flooding that followed.’²⁶
- ‘Extreme wildfire activity has more than doubled worldwide [in the last 21 years].’²⁷ These wildfires have had severe consequences for air quality, biodiversity and human health, and continue to shape global discussions on climate resilience and emergency preparedness.
- ‘More than 32,000 people have died trying to reach Europe in the past 10 years – including 1,300 dead or missing this year [as at September 2025].’²⁸
- ‘Cyclone Gabrielle in 2023 and the Auckland Anniversary floods caused an estimated \$14.5 billion in damage, of which insurers paid \$3.8 billion in claims ... global insured losses from natural catastrophes in 2025 are likely to surpass \$100 billion for the seventh straight year ... The largest single loss to date is the Los Angeles wildfire, with insured losses of more than \$40 billion.’²⁹

These shifts are straining local systems and amplifying demand for essential resources, including food and water, especially in regions already facing environmental stress. It is not surprising, therefore, that the September 2025 *Mood of the Boardroom* survey revealed that 78% of chief executives in New Zealand report that their boards regularly assess geopolitical vulnerabilities as part of their risk matrix.³⁰ This reflects a growing recognition that global instability, from trade tensions and resource competition to climate-induced migration, is creating significant challenges for businesses. We cannot afford to ignore risks on the basis that new systems are too hard to implement.

New Zealand's environment is under significant pressure, and we must urgently adapt to climate change and reduce carbon emissions. Climate change is one of the most serious risks facing New Zealand, and the proposed Bill fails to include detail on how they will respond to and help slow the impacts of it.

The Climate Change Performance Index (CCPI) notes that New Zealand's 2025 climate action is backsliding, and that the recent proposed revision of the second emissions reduction plan reinforces this. CCPI make the following key points:

- New Zealand was ranked 44th in 2025's CCPI and its climate policy performance was rated 'very low'.
- New Zealand's NDC2 does not meet the requirements of the Paris Agreement. It is not aligned with 1.5 degrees Celsius of warming and does not reflect New Zealand's highest possible ambition, with the Climate Change Commission finding that domestic action alone could feasibly contribute to emissions reductions of up to 69% below 2005 gross levels by 2035 without harming economic growth.³¹

Like the rest of the world, New Zealand is facing the impacts of rising temperatures, changing weather patterns, and increased occurrences of extreme weather events. These changes are serious and will increase, impacting the next generation and beyond. New Zealand needs to both reduce our greenhouse gases and prepare for future climate-related risks. MfE has noted the impacts are increasing in frequency and severity across the country:

Aotearoa New Zealand experienced its second warmest year on record in 2023, just shy of the record set in 2022, with an average temperature of 13.6 °C. Climate change projections for Aotearoa show further warming is projected by 2090, with more hot days and fewer cold days across the country over the next decades.³²

We need to prepare for an uncertain future. Making decisions in the name of economic prosperity today, with a substantial risk of creating an economic and environmental burden in the future, is irresponsible to future generations. Further, the lack of consideration of climate change in the proposed Bill undermines New Zealand's investment in and commitment to climate mitigation and adaptation strategies.

New Zealand's international commitments

New Zealand is party to a number of international agreements committing us to reducing our emissions and working to help mitigate climate change. It is important we stand by these agreements to maintain our international relationships and trade reputation built on the 'clean, green' image of our exports.

As it is written, the proposed new Bill fails to integrate the principles of the international commitments New Zealand has made. This will have serious risks for our trade agreements, reputation and economy.

Recent international criticism of New Zealand's backwards shift in emissions targets at COP30 reflects the importance of acting now to reduce emissions, comply with our commitments, and maintain our international reputation and trade relationships.³³ Earlier this month, our trading partners, including the UK, raised concerns over the decline in New Zealand's climate policies again. The UK's views on our climate change policies are especially important to the economy as New Zealand's trade with the UK depends upon our climate commitments and is worth \$1 billion per year to New Zealand.³⁴

Our international commitments are increasingly being included in New Zealand's trade agreements. Complying with them is critical for trade – which is essential for our economy. For example, Article 3 of the Free Trade Agreement with the EU, signed on 9 July 2023, states that a party has an obligation to refrain from any action or omission that materially defeats the object and purpose of the Paris Agreement.

Some of New Zealand's relevant international commitments are below:

Paris Agreement

The Paris Agreement is the global agreement on climate change adopted by parties under the United Nations Framework Convention on Climate Change (UNFCCC) on 12 December 2015. New Zealand ratified the Paris Agreement on 4 October 2016.³⁵ The purpose of the Paris Agreement is to:

- keep the global average temperature well below 2°C above pre-industrial levels, while pursuing efforts to limit the temperature increase to 1.5°C
- strengthen the ability of countries to deal with the impacts of climate change
- make sure that financial flows support the development of low-carbon and climate-resilient economies.³⁶

The Paris Agreement took effect in 2020, which means our commitments to reduce greenhouse gas emissions, our Nationally Determined Contribution (NDC), applied from 2021. New Zealand's first NDC was to reduce greenhouse gas emissions by 50% below 2005 levels by 2030.³⁷ In 2025, the Government announced New Zealand's second NDC is to reduce emissions by 51–55% compared to 2005 levels, by 2035.³⁸

Global Methane Pledge (GMP)

There is a global agreement to reduce methane, which was launched at COP26 by the European Union and the United States. The GMP today consists of 159 participating countries (including New Zealand) and the European Commission. These countries have all pledged to globally lower methane emissions by 30% from 2020 levels, by 2030.³⁹

United Nations Framework Convention on Climate Change

New Zealand is a party to the United Nations Framework Convention on Climate Change (UNFCCC), an international treaty that enables over 185 countries to collectively consider how to mitigate climate change and cope with its impacts. New Zealand also has commitments to the significant agreements under this treaty, including the Kyoto Protocol, the Doha Amendment to the Kyoto Protocol, and the Paris Agreement.⁴⁰

New Zealand's Emissions Trading Scheme supports and encourages global efforts to reduce greenhouse gas emissions by helping New Zealand meet its international obligations under the UNFCCC. New Zealand's Environmental Protection Authority administers the Emissions Trading Scheme and the New Zealand Emissions Trading Register.⁴¹

United Nations Sustainable Development Goals

Goal 13 of the 17 Sustainable Development Goals established by the United Nations in 2015 is to take 'urgent action to combat climate change and its impacts'.⁴² The Ministry of Foreign Affairs and Trade (MFAT) states that although these goals are not legally binding, countries are expected to report voluntarily on implementation and 'New Zealand will contribute to achievement of the goals through a combination of domestic action, international leadership on global policy issues, and supporting countries through the New Zealand Aid Programme'.⁴³

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