

McGuinness Institute Submission

Fisheries Amendment Bill

6 May 2026

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1.0 Introduction

The McGuinness Institute (the Institute) welcomes the opportunity to submit on the proposed Fisheries Amendment Bill, referred to as the Bill.

We thank the Primary Production Committee (the Committee) for inviting feedback on this Bill which proposes to have significant impact on New Zealand.

We would welcome the opportunity to speak before the committee.

The Institute's view is that the Bill primarily weakens environmental safeguards and accountability mechanisms in fisheries management while increasing flexibility for economic considerations, raising concerns about long-term sustainability. It also fails to look at ways to improve efficiency and protect the marine domain.

While recognising the Government's stated objective of improving the responsiveness and efficiency of New Zealand's fisheries management system, the Institute considers that the Bill, as drafted, will not achieve sustainable or durable outcomes for New Zealanders.

Taken as a whole, the Bill represents a significant re-orientation of New Zealand's fisheries governance framework. Across multiple provisions, including catch-limit setting, landing and discard rules, minimum size requirements, deemed value settings, and access to on-board camera footage, the Bill replaces clear, rule-based safeguards with increased discretion, flexibility, and reliance on internal administrative systems.

The Institute is particularly concerned that these changes are being proposed in the context of limited and outdated baseline information on fish stocks, increasing climate-driven uncertainty, and growing pressure on marine ecosystems. In such conditions, durable fisheries management depends not only on flexibility, but also on reliable intelligence, transparency, precaution, clear environmental limits, public trust, and the all-important social licence.

Several provisions in the Bill risk weakening the disciplining structure of New Zealand's fisheries management system by:

- reducing public transparency and independent scrutiny
- altering incentives around bycatch, discards, and undersized fish
- increasing ministerial and administrative discretion without commensurate safeguards, and
- prioritising short-term export growth over long-term ecological and intergenerational outcomes.

The Bill does not adequately account for climate change, biodiversity loss, or New Zealand's international environmental and trade commitments. Nor does it demonstrate that the proposed reforms are supported by sufficient scientific evidence, economic analysis, or international best practice.

We also question the economic value of growing seafood sector exports and whether any economic benefits from the sector growth will be passed on to New Zealanders, especially when internationally owned companies operate in our oceans, using a public asset owned in common for New Zealanders, for free.

The Bill is using an outdated model and is not considering potential 2026 opportunities. It also fails to consider the latest in technology, climate impacts or consumer behaviour. For example, the proposed bill fails to look at potential technological opportunities, such as drones, AI and low earth orbit (LEO) satellites to contribute to the management of our marine stock:

- A multi-purpose drone ecosystem is discussed in the Institute's *Think Piece 44 – Building an integrated and interconnected AI drone system* (August 2025)¹
- AI can help New Zealand manage fisheries by watching the ocean more effectively, predicting fish stocks, targeting enforcement, and improving long-term sustainability decisions.
- LEO satellites are becoming a significant, and fast-growing, part of the international technology, infrastructure, and policy landscape. Given the Institute's interest in systems and foresight, the marine domain space sits at the intersection of communications (e.g. cables), defence oversight and intelligence about our borders, defence of our small nation, fishing management, drug smuggling, national resilience (e.g. rising temperatures, rogue waves, and tsunamis), and maritime governance.

The proposed Bill does not appear to encourage the kind of discussion required to achieve a durable, long-term solution, to provide business certainty and environmental sustainability. Instead of creating a collaborative path forward, it seems to intensify the opposing positions of each group.

The McGuinness Institute recommends the Bill **not** be passed in its current form. We encourage the Select Committee to adopt a long-term governance lens and reconsider whether the proposed reforms strengthen or erode the integrity, transparency, and resilience of New Zealand's fisheries management system.

1.1 Summary of this submission

Concerns:

- The Bill represents a significant shift away from a learning and adaptive approach that responds to data, context, or principles.
- Multiple provisions cumulatively weaken transparency, accountability, and public trust.
- The Bill is poorly aligned with conditions of climate change, biodiversity loss and ecological uncertainty.
- Baseline information on fish stocks is insufficient to justify the scale of proposed reforms.
- Reduced access to on-board camera footage undermines social licence for an industry operating – for free – in a public resource.
- Changes to discard rules, size limits, and deemed values risk weakening incentives that protect fish stocks, resulting in less fish and a smaller industry in the medium to long term.
- The Bill prioritises short-term export growth over long-term environmental and intergenerational outcomes.
- The policy objective underlying the proposed bill aligns more closely with a “drill-baby-drill” approach. In promoting commercial fishing without checks and balances, the legislation, if enacted, risks reading more like “fish-baby-fish.”

Fifteen recommendations:

1. Do not proceed to enact the proposed Bill without further research and careful consideration of its costs, risks, and benefits, particularly in light of recent technological advances.
2. Establish an independent Minister for Oceans.²
3. Reestablish an Oceans Secretariat and establish an independent Minister for Oceans.
4. Invest in cost-effective intelligence systems to establish stronger baseline data and monitoring to maintain environmental limits, and use this information to adapt ocean policy quickly.
5. Embed New Zealand's climate and biodiversity commitments, including New Zealand's 2050 target, Emissions Reductions Plans and international climate commitments.
6. Increase the amount of marine protected areas.
7. Develop marine protections for the Marlborough Sounds through a Marlborough Sounds Marine Protection Act (similar to the Hauraki Gulf / Tīkapa Moana Marine Protection Act 2025).
8. Require in the proposed Bill a fishing strategy to be published at least every five years, with mandatory public consultation prior to approval by the responsible Ministers (ideally the Minister for Oceans and the Minister for Fisheries).
9. Incorporate regular monitoring, evaluation, and regular feedback loops as part of any oceans legislation to ensure the policy remains fit for purpose.
10. Analyse other alternatives.
11. Require climate impacts and transition strategies to form a key part ocean management.
12. More checks and balances are needed to prevent any significant 'unchecked power'.
13. Financial and reputational penalties require more consideration.
14. Produce updated research on the value of New Zealand's environment and reputation.
15. There needs to be transparency on AI use.

These recommendations are explained in more detail in section *5.0 Recommendations* below.

The Institute recommends the Bill should not be passed in its current form.

2.0 Background

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

Context of the Bill

The Institute also submitted against the Fisheries Amendment Bill in April 2025. Despite strong opposition from the public, with 27,000 submissions received and over 90% of these against the Bill, the Fisheries Amendment Bill was released in March 2026 and fails to reflect any of the public's concerns.³

Two seismic policy shifts in the Bill

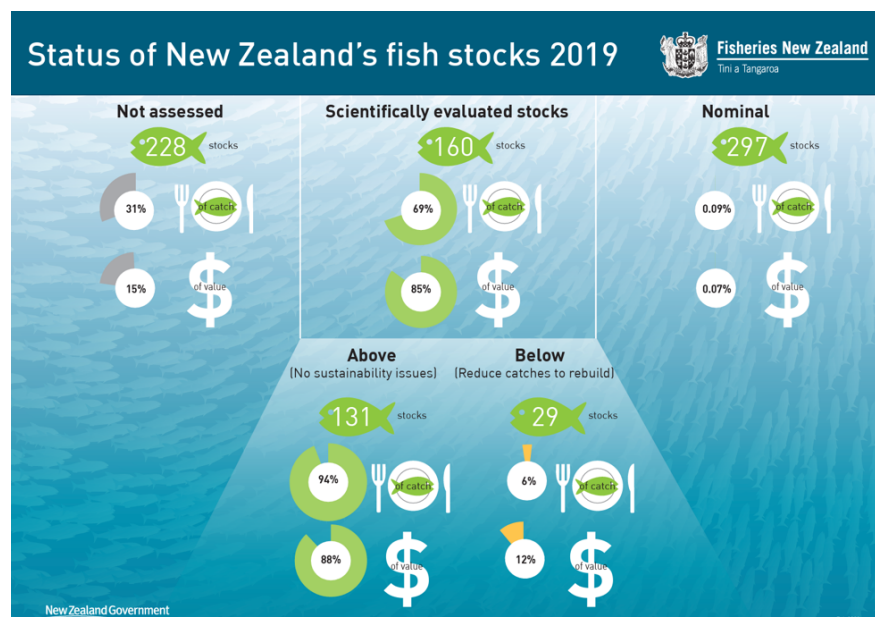
From our perspective, the Bill works together with other policy changes to represent two seismic shifts in New Zealand's policy landscape over the past few years:

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.

Lack of information on New Zealand's fish stocks

The Fisheries New Zealand website states, 'Each year, we assess the status of as many fish stocks and fisheries as possible.'⁴ However, the most recent publicly available data we could find on that page was from 2019 (seven years ago). Further, the 2019 *Status of New Zealand Fish Stock* states that 160 stocks were assessed while 228 stocks were not. This information is inadequate to base such a significant policy shift on.

Source: MPI (2019) *Status of New Zealand's fisheries stocks 2019*.⁵



The Institute recommends New Zealand's fisheries stocks should be assessed on a regular basis. This will develop stronger policy which is based on updated data.

3.0 Specific Responses to the Bill

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 the primary sector has on species and ecosystems).

Below is our response to the key changes proposed.

3.1 Purpose

The submission page states, ‘The bill would amend the Fisheries Act 1996 and **seeks to grow the value of seafood sector exports while continuing to ensure sustainability** [bold added].’

This purpose is inappropriate on a number of levels:

- Why focus on exports when they benefit a such small number of businesses (some of which are owned by international shareholders)?
- Is the seafood export industry appropriate to support given the current geopolitical climate, fuel crisis and changing climate? Would it be wiser to support more affordable and sustainable industries, instead?
- How will the Bill impact recreational fishing for New Zealanders?
- How does the current Bill ‘ensure’ sustainability when there is a lack of recent data on New Zealand fish stocks?
- How will the Bill protect our fisheries industry from climate change? Warm temperatures and extreme weather events are already impacting species and their habitats, changing ocean productivity and affecting fisheries yields. This Bill fails to consider the impacts of ocean warming, ocean acidification, habitat degradation and other stressors.

The real question is, how will the Bill ‘ensure sustainability’ or achieve other benefits for New Zealanders when it:

- puts exports and private interests ahead of New Zealanders and recreational fishers
- removes transparency in the industry by removing public access to camera footage
- disregards environmental safeguards so the Minister can legalise dumping unwanted fish and catching undersize fish, while increasing commercial catch limits
- fails to protect our species limits by removing commercial minimum size limits for fish species
- removes public involvement by restricting the public’s ability to legally challenge the Minister’s decisions (a 20-day submission timeframe is unreasonable)
- removes public involvement by amending section 14 to enable catch decisions to apply for up to five years, with limited public input
- decreases protections for fish species by amending sections 11 and 13 of the Fisheries Act to remove environmental safeguards protecting biodiversity and abundance of our fish.

The Institute strongly recommends the purpose of this Bill should include protection of the marine ecosystems.
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3.2 Changes to catch limits

- Expanding the range of options for setting and adjusting sustainable catch limits.
- Amending decision-making processes under the Act related to catch limits and related fisheries management measures.

The proposed changes relating to catch limits are not well considered. They alter the decision-making framework itself without first establishing, evidencing or stress-testing the long-term consequences of that shift.

The Bill proposes to expand the range of options for setting and adjusting sustainable catch limits and to amend decision-making processes related to those limits. However, it does so without clearly restating or strengthening the decision-making objectives, constraints, and safeguards that should govern the use of those options.

The Bill emphasises flexibility and efficiency, while leaving critical questions largely unresolved, including how the proposed trade-offs between utilisation and sustainability are to be managed. It shifts power from scientific reference points to ministerial discretion, which is inconsistent for businesses and is likely to weaken environmental standards.

Fisheries management is inherently uncertain, particularly in the context of climate change and ecosystem variability. While the Bill cites improved data availability as justification for increased flexibility, it does not demonstrate how this data will be systematically used to:

- detect emerging risks early
- trigger precautionary responses, or
- reverse decisions if assumptions prove incorrect.

The proposed changes to how catch limits are set are presented as procedural or technical adjustments. In reality, they are substantive policy shifts because they influence:

- who makes decisions
- over what time horizons decisions apply, and
- how frequently decisions are revisited.

By enabling multi-year or more flexible adjustments to catch limits, the proposal changes the temporal structure of accountability. Decisions that were previously revisited regularly may now persist without reassessment, even as environmental conditions change. This is especially concerning in the context of climate change and the biodiversity crisis. The Institute suggests a considered change that instead:

1. defines the problem the current framework fails to solve
2. specifies the outcomes the new framework is intended to achieve, and
3. sets out clear conditions under which expanded discretion may be exercised.

The Institute strongly recommends this is not included.

3.3 Use and protection of on-board camera footage

- Exempting on-board camera footage from requests under the Official Information Act 1982.
- Establishing specific disclosure provisions that allow the Ministry for Primary Industries to share footage in limited, prescribed circumstances.

The fishing industry is different to other industries because private companies are using a public resource – the ocean – for free. These private businesses then sell their catch from this public resource for a private profit. As such, the fishing industry requires a social license to operate. From the evidence, it is clear that on-board cameras are successful at improving reporting. Refer to Table 1 from MPI below.

Table 1: MPI data shows clear increases in reporting after cameras were rolled out on commercial fishing vehicles

Table source: MPI⁶

Type	Change	
Albatross interactions	3.5x	↑
Dolphin Captures	6.8x	↑
Number of fish species reported in catch	34%	↑
Number of fish species in discards	21x	↑
Volume of fish discards	46%	↑
Undersized snapper discards	12.8x	↑
Kingfish discards	9.5x	↑

The public must have trust that the industry is operating legally to protect this public resource. On-board cameras are critical for transparency and accountability. Removing on-board camera footage from the scope of the OIA would be a significant departure from standard public-sector accountability settings in New Zealand. The Bill fails to explain how removing on-board cameras will have any benefits, and their exclusion undermines accountability for a public resource.

The Institute strongly recommends this is not included.

3.4 Landing and discard rule changes

- Allowing commercial fishers to return quota management system (QMS) species to the sea when fishing activities are monitored by an on-board camera or an observer.
- Making additional amendments to support the effective operation and enforcement of landing and discard rules.

Landing rules do more than record catch; they influence fisher behaviour. Allowing QMS species to be returned to the sea may:

- reduce incentives to avoid bycatch or undersized fish
- shift decisions toward discarding rather than adapting fishing practices, and
- alter risk-taking behaviour where detection is perceived as unlikely or delayed.

The Bill's discard provisions are closely linked to changes limiting public access to on-board camera footage (discussed in section 3.3). Taken together, these reforms mean that:

- more fish may legally be returned to the sea (which negatively impacts ocean ecosystems)
- evidence of those decisions would be increasingly inaccessible to the public (decreasing public confidence in the fishing industry), and
- assurance would rely heavily on internal regulatory confidence rather than external scrutiny (a high-risk strategy which is likely to lower environmental standards).

For the fisheries industry – which operates in a publicly owned natural resource – this combination of proposed policy changes risks weakening public trust, particularly where sustainability outcomes are contested or uncertain.

The Institute strongly recommends this is not included.

3.5 Catch size requirements for commercial fishing

- Removing minimum commercial fish size limits from the regulations for specified species.

This lacks any evidence and will negatively impact fish stocks, as well as recreational fishers. Minimum size limits:

- protect juvenile fish to support stock replenishment
- encourage fishing methods and behaviours that avoid immature catch
- are a clear, easily enforced biological safeguard, and
- reinforce sustainability settings alongside quotas and catch limits.

It is unclear why commercial fishers (catching a far greater quantity of fish than recreational fishers) should be free from size limits when everyday New Zealanders must follow guidelines.

Minimum size limits are among the most transparent and intuitively understandable sustainability tools for both industry participants and the public. Removing them alters not only compliance rules, but the ecological and behavioural balance of the ocean ecosystem.

The Institute strongly recommends this is not included.

3.6 Changes to deemed value settings

- Introducing new rules that allow specific deemed value rates to be set for inshore stocks when caught by deepwater freezer vessels.

Deemed values are established regulatory tools intended to make catching fish outside quota uneconomic or unattractive, except in limited and justified circumstances. Adjustments to deemed value settings therefore have system-wide implications for incentives, behaviour, and quota discipline. The proposed changes represent a substantive shift in the economic architecture of the QMS. Careful calibration is required to ensure that flexibility and fairness do not undermine quota discipline, public confidence, or the long-term integrity of fisheries governance.

As with other parts of the Bill, increased discretion heightens the importance of clear statutory criteria, transparent decision-making, and robust public reporting.

Without transparency, it may become difficult for external stakeholders to assess whether deemed value settings continue to support sustainability objectives rather than commercial fishing operations. Working with the other proposed changes, the changes to deemed value settings will cumulatively reduce the number of policy constraints in the system. Instead, these proposed changes increase reliance on ad-hoc monitoring and discretion. This is likely to result in inconsistent standards, negative impacts on environmental limits and unfairness within the commercial fishing system and to recreational fishers.

The Institute strongly recommends this is not included.

4.0 General 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.

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

As explained in *Appendix 2: the context*, climate change impacts are increasing, with extreme weather and natural disasters causing loss of life and property across the country. The February 2026 Mt Maunganui landslide is one example.⁷

Any change to public policy is an opportunity 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:

- include the climate impacts of activities as part of planning (for instance, as oceans warm and fish species are threatened, how will the Bill protect fish ecosystems?)
- integrate with New Zealand's 2050 target, Emissions Reductions Plans and international climate commitments
- outline climate adaptation and planning for extreme weather, natural disasters and sea level rise. It is worth considering whether the fishing industry, which faces an uncertain future and is highly susceptible to the changing climate, is worth investing in right now.

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

New Zealand has the highest proportion of threatened species anywhere in the world.⁸ 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.). In particular, we lack sufficient baseline data on our ocean species.

The Institute recommends regular monitoring and research on marine ecosystems and their habitats should be legally required. Climate change will directly impact where our baselines sit, and our policy needs to follow adaptive management before it is too late.

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

Certainty is a key part of efficient law, and this Bill lacks clear definitions and details. It is highly likely the next government will change the proposals back to improve ocean protection. This creates inefficiency and cost for both the public sector and the businesses and people impacted by the Bill.

It is vital 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 this Bill will be implemented only to be overturned 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, and fails to reflect the complexity of interconnected marine ecosystems.

The Bill will likely allow for more, and easier, commercial fishing in New Zealand's public ocean space without transparency and oversight. This will negatively impact indigenous biodiversity and our ocean's ecosystems.

The ocean is a public resource, used by New Zealanders for recreation, and it should be preserved for future generations. A high proportion 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.

Looking at the wider context of how critical our ocean 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.

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, usually generations. Each generation believes what they grew up with is the 'standard baseline' for environmental limits; however, these baselines are in fact declining significantly.⁹ For example, what our grandparents could gather or catch at the beach was far more than we can, and our children will have even less. Once limits are exceeded, or species are extinct, these changes are often irreversible.

We recommend implementing scientific limits and monitoring these regularly, adapting to any changes, allowing the community to protect the environment for future generations. This approach, rather than adding 'flexibility', will have much greater benefits for ocean management now and into the future.

The Institute recommends the Bill:

- be amended to elevate the protection and management of ocean ecosystems 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 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, and
- require that these limits are regularly monitored, with serious legal consequences where limits are breached.

5. 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:

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

5.0 Recommendations for the Bill

1. Do not proceed to enact the proposed Bill without further research and careful consideration of its costs, risks, and benefits, particularly in light of recent technological advances.

Greater attention should be given to identifying and deploying multi-purpose technologies that can provide timely, cost-effective intelligence to support the management of New Zealand's ocean ecosystems and deliver long-term benefits for both current and future generations.

Fish should not be viewed in isolation; they are an output of a far more complex ecological system. Ensuring the durability of this public asset requires a more integrated and strategic approach to its protection, utilisation, and maintenance.

International experience suggests that the most effective fisheries governance systems are those that combine:

- (1) secure and well-defined rights,
- (2) independent and trusted scientific institutions,
- (3) adaptive and responsive management frameworks, and
- (4) strong public trust and stakeholder legitimacy.

2. Establish an independent Minister for Oceans.¹⁰

The Oceans and Fisheries Portfolio responsibilities are described as including 'the management of New Zealand's fisheries (including aquaculture), providing for use while ensuring sustainability of those resources for the benefit of New Zealand as a whole, and responsibility for oceans policy.'¹¹

In practice, however, the focus has been largely on production outcomes through the management of New Zealand's fisheries (including aquaculture), alongside related policy and legislation. Notably, the DPMC website lists the department responsible as: 'Fisheries New Zealand, which is a business unit within the Ministry for Primary Industries, provides support for this portfolio.'¹²

To date, it is therefore not surprising to find that there has been limited emphasis on sustainability or on developing a broader oceans policy. In our view, the merging of these portfolios appears to reflect a political response rather than a coherent policy approach.

Furthermore, the Minister of Oceans and Fisheries is conflicted in two sets of objectives: protecting ocean ecosystem versus increasing fisheries outputs (in which case, outputs will always win as the current system has very weak ocean protection objectives). An independent Oceans Minister would have the ability to focus on the wider context of ocean management, rather than outputs.

We suggest that, even if the same individual holds both the Oceans portfolio and the Fisheries portfolios, formally separating the two roles by department would improve accountability, transparency, and the quality of decision-making. In reality, fisheries represent one small subset of the broader ocean domain.

To resolve this weak policy system, the Institute recommends ocean stewardship and marine protection becomes an objective of ocean policy, which can be done by establishing an independent Minister for Oceans (stewardship-based) who is separate from the Minister of Fisheries (production-based).

3. Reestablish an Oceans Secretariat and establish an independent Minister for Oceans.

The current structure of the Oceans and Fisheries portfolio means production and ‘improving exports’ are the only objectives driving ocean policy in New Zealand. This is inadequate: A balanced approach is essential to ensure objectives of all New Zealand’s various ocean stakeholders are reflected in our ocean policy. Some of these ocean stakeholders include iwi, recreational fishers, tourists and tourism operators, local communities, fishing businesses and aquaculture businesses, all of whom have objectives other than seafood production for exports (which is the focus of this Bill and its amendments).

As can be seen by the immense public opposition to this Bill (with an overwhelming majority - over 90% - of public submissions opposed to its 2025 iteration), New Zealanders are passionate about protection of our ocean.¹³ We want a clean ocean space that is free from pollution, with healthy marine ecosystems that live within it – not more exports of seafood overseas.

The Oceans Secretariat is a critical inter-agency group that was designed to deliver holistic ocean management across the country, and to support the Minister for Oceans and Fisheries and the Officials Marine Management Group.

The reasoning for why an Oceans Secretariat is so important for New Zealand can be observed in the below extract from a 2024 cabinet paper released under an OIA request:

The creation of the Oceans and Fisheries portfolio – expanded from the former Fisheries portfolio – **signals the Government’s commitment to a more holistic, integrated approach to managing the oceans.** This is consistent with the Government priority of Laying the Foundations for the Future, and will assist New Zealand’s economic recovery from COVID-19...

Oceans and coasts are central to New Zealanders’ identity, wellbeing and prosperity. Iwi/Māori have diverse rights and interests in the marine environment, including rights under fisheries and aquaculture settlements and other relevant legislation.

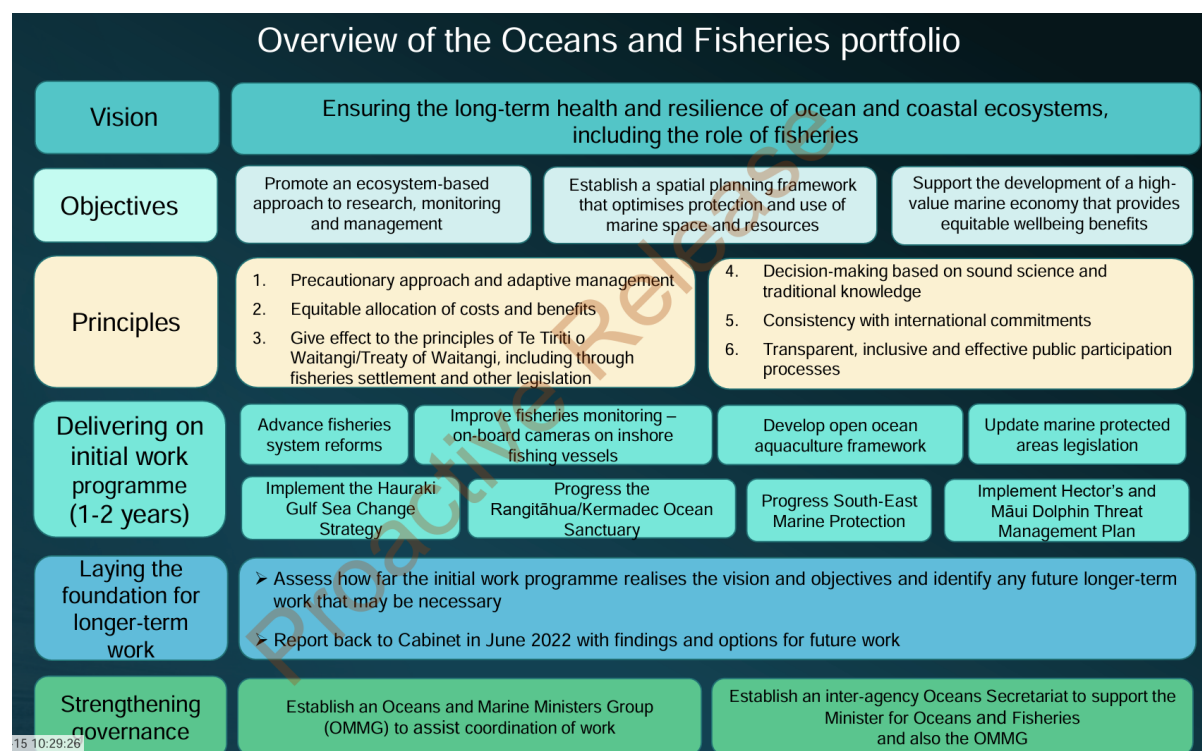
Activities on land and at sea, and their cumulative effects, are negatively affecting the marine environment; and climate change is warming seas, with impacts on marine ecosystems that are expected to increase.

Our current marine management system is fragmented and has difficulty responding to these pressures in a holistic, timely manner. Current settings have also hindered opportunities for growth and innovation. Progress on marine protection has been slow relative to objectives under international treaties. The Oceans and Fisheries portfolio will address these problems.¹⁴ [bold added]

The below table *Overview of the Oceans and Fisheries Portfolio* is an extract from this MPI document which shows how narrow the current public policy is for ocean management in New Zealand. As seen in the table, the Department of Conservation is completely removed from overarching stewardship of marine ecosystems, despite their purpose to ‘protect and restore nature’.¹⁵

The current system, including what is proposed in this Bill, focuses on an output-based model rather than a stewardship one. This is inadequate for New Zealand and will not help solve the current challenges – and those ahead – in our ocean management.

New Zealanders rely on our marine ecosystems to purify the air, store carbon, grow food, ship products, provide recreation and protect habitats for marine life. The oceans' governance must therefore navigate a complex set of goals and objectives (not just fisheries exports). We need a policy framework that delivers cost-effective public policies that are measurable, transparent and able to be policed.



Source: MPI.¹⁶

The Oceans Secretariat was cut in 2024, however it fulfilled a critical role of holistic ocean management for New Zealand.¹⁷ Although conceptually a useful, if limited, forum for developing practical, win-win approaches, it remained largely ineffective due to the lack of dedicated ministerial oversight. The reestablishment of an Oceans Secretariat, when combined with an independent Minister of Oceans would be a stronger and more useful governance system that is more likely to lead to durable public policy.¹⁸

To resolve this weak policy system, the Institute recommends ocean stewardship and marine protection becomes an objective of ocean policy, which can be done by reestablishing the Oceans Secretariat to provide a holistic protection of New Zealand's marine space.

4. Invest in cost-effective intelligence systems to establish stronger baseline data and monitoring to maintain environmental limits, and use this information to adapt ocean policy quickly.

Such system should include research and update stock level information, establishing 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.

The Institute recommends:

- Comprehensive baseline studies are required before approving new activities in the ocean.
- Ongoing ecological monitoring of flora and fauna and their habitats is mandated, and adaptive management is applied.
- All environmental reporting is publicly available.
- This data should directly inform fisheries policy, developing a system that is responsive to issues as they arise (e.g. if heatwaves are impacting a species, can implement a freeze on fishing those stocks until they can reestablish).

5. Embed New Zealand's climate and biodiversity commitments, including New Zealand's 2050 target, Emissions Reductions Plans and international climate commitments.

As well as a failure to integrate with New Zealand's climate and biodiversity strategies, the Bill fails to consider New Zealand's international commitments, which will negatively impact our trade agreements, international commitments and reputation.

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

As written, the Bill fails to integrate the principles of our international commitments. This will have serious risks for our trade agreements, reputation and economy.

Recent international criticism of New Zealand's backward shift in emissions targets at COP30 shows the importance of acting now to reduce emissions, comply with our commitments, and maintain our international reputation and trade relationships.¹⁹ 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.²⁰

Our international commitments are increasingly being included in New Zealand's trade agreements – complying with them is critical for trade, and thus 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 3*.

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

6. Increase the amount of marine protected areas.

The total marine protected areas in New Zealand should be – at a minimum – at least 30% by 2030, as per New Zealand’s international commitments.

In 2022, New Zealand was one of 196 countries that signed the Convention on Biological Diversity, committing to protecting 30% of our land, our internal waters and territorial sea by 2030.²¹ At present, only 0.4% of New Zealand’s marine territory is fully protected as no-take marine reserves.²² With less than four years until 2030, improving marine protection should be an immediate priority. If New Zealand does not comply with international legal obligations, it may result in legal action, incurring significant legal and reputational costs for the country.

The relevant details of our international commitments are explained in more detail in *Appendix 3*.

What makes this so concerning is that New Zealand has the world’s fifth-largest territorial waters to protect, and is responsible for global ecological hotspots, such as the Marlborough Sounds and Cook Strait.²³ The urgent need for marine protection in the Marlborough Sounds is discussed in recommendation 3 below.

The Institute recommends that New Zealand immediately work on improving the amount of marine protected areas, to at a minimum protect 30% by 2030, complying with international requirements and increasing species habitat protection in the face of climate change.

7. Develop marine protections for the Marlborough Sounds through a Marlborough Sounds Marine Protection Act (similar to the Hauraki Gulf / Tīkapa Moana Marine Protection Act 2025).

The Marlborough Sounds is an iconic part of New Zealand’s ocean space that requires urgent protection. It is a critical marine and terrestrial ecosystem in a serious state of decline, with key environmental stressors including high levels of sedimentation, damage to seabed habitats from bottom trawling and dredging, over-harvesting of fish stocks and climate change.²⁴

Environmental strain is projected to continue with further warming likely to result in a decrease in the productivity of fish stocks and marine farms as well as the loss of resident species. Extreme rainfall events are projected to become more severe with climate change, which will also likely increase sedimentation within the Sounds, unless effective land use changes are put in place.²⁵

The need for increased protection in the Sounds has been raised by marine scientists and recreational fishers for many years, with the 2015 State of the Environment report calling for urgent protection over ten years ago: “Marlborough’s marine biodiversity is not in good shape, particularly in the Sounds. The significant issues are: fewer fish, not as many species, serious loss of biogenic habitats, sedimentation in estuaries smothering thousands of hectares of seabed and biosecurity incursions.”²⁶

Reversing this long-term degradation will require a coordinated effort which marine restoration (through ecosystem protection) as well as land-based efforts. Currently, Marlborough District Council, DOC and Fisheries NZ all provide marine management services in the Sounds.

The Institute recommends the Marlborough Sounds protection could follow the same model as the Hauraki Gulf/Tīkapa Moana Marine Protection Act, implemented in 2025. This Act was

implemented in response to consecutive State of our Gulf reports illustrating the Hauraki Gulf/Tikapa Moana is in an ongoing state of environmental decline with pollution, sedimentation and climate change negatively impacting coastal and marine plants and animals.²⁷ Serious environmental issues in the area include increasing amount of kina barrens, habitat loss and localised fisheries depletion.

Through the Hauraki Gulf/Tikapa Moana Marine Protection Act, the protected area in the Gulf grew from 0.3% to 5.9% with 19 new protected areas.²⁸ It is hoped these protected areas will contribute to a healthier Gulf for future generations.

In the Marlborough Sounds context, special protection would be beneficial for the environment, local communities and would have a positive impact on fish stocks. The Marlborough District Council planning frameworks (particularly the Proposed Marlborough Environment Plan [PMEP]) recognise the ecological significance and sensitivity of areas within Queen Charlotte Sound in particular, and provide for their protection through a range of objectives, policies, and rules, including the identification of ecologically significant marine sites.

The Proposed Marlborough Environment Plan (PMEP) already establishes a high level of protection across Queen Charlotte Sound. This is achieved through the combined effect of:

- a) the mandatory requirement under section 6(c) of the Resource Management Act to protect significant habitats;
- b) the identification and mapping of Ecologically Significant Marine Sites (ESMS), which impose elevated protection on ecologically important areas;
- c) strengthened controls through Variation 2, including restrictions on activities such as the use of coastal water; and
- d) a comprehensive suite of coastal environment policies that manage and constrain development and use.

Taken together, these provisions demonstrate that the PMEP already operates as a high-protection planning framework for the marine environment, including Queen Charlotte Sound. Hence, making the Sounds a marine protected area through a Marlborough Sounds Marine Protection Act would be a impactful and straightforward way to increase New Zealand marine protected area.

The Institute recommends that a Marlborough Sounds Marine Protection Act is implemented to protect the entire stressed ecosystems there immediately.

8. Require in the proposed Bill a fishing strategy to be published at least every five years, with mandatory public consultation prior to approval by the responsible Ministers (ideally the Minister for Oceans and the Minister for Fisheries).

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. A three-yearly review reflects concerns about the changing climate, including marine heatwaves impacting our ocean ecosystems.

The Institute started a *GDS Index* research project in 2014 and regularly updates it. 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.²⁹ However, the 2024 *GDS Index* found only 16% of GDSs in operation (32 out of 195) were required or

referred to in legislation.³⁰ Page 12 of the Institute’s *2024 GDS Index Methodology* contains a list of these 32 GDSs.³¹

Requiring in law that a strategy be published is a useful mechanism for Parliament to ensure strategies are developed, consulted on 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 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](#).

We recommend that more GDSs be mandated by law to ensure a higher level of due diligence, ownership, durability and accountability. We believe 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.

9. Incorporate regular monitoring, evaluation, and regular feedback loops as part of any oceans legislation to ensure the policy remains fit for purpose.

The ocean environment is changing and the policy that governs it must be able to change too. It is critical to review policy regularly to ensure it is working as intended. Consistent reviews help build intelligence on what works and what does not.

Regularly mandated policy reviews should analyse impacts from the perspectives of communities, businesses and scientists. For instance, developing 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 the legislation includes periodic progress reviews of how the policy 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 more.
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10. Analyse other alternatives.

The Institute recommends other alternatives be explored – there is likely to be a solution that works better for our communities, the environment and the economy. Are there alternatives that will support the fishing industry consistently and sustainably?

The Institute recommends detailed analysis of the fisheries policy regimes in other similar countries is required to understand how they balance economic and other factors.
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11. Require climate impacts and transition strategies to form a key part ocean management.

New Zealand's environment is under significant pressure and we must adapt to climate change and reduce carbon emissions to prevent further environmental degradation. Climate change, one of the most serious risks facing New Zealand, should be an important part of any regime. 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, in turn causing activities such as aquaculture to need to relocate.

The Institute recommends the Bill includes:

- Detail on how ocean management 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.

12. More checks and balances are needed to prevent any significant 'unchecked power'.

We need to ensure that decisions are made transparently, and that there are no backhanders or other actions where the Minister (or associates) benefit at the expensive 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.

13. 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, we need strong and public penalties. The Institute recommends including penalties in the legislation for acting against the way the law was intended to operate.

Unethical behaviour or breaches should result in public penalties, scaled so 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.

14. 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 difficult when only economic values can be quantified. We recommend economic analysis is regularly undertaken to quantify other values, such as a clean environment, flora and fauna existing for future generations, natural environments that allow for tourism and recreation, and 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 what actions will reduce it and that we should avoid taking. In 2001, the Ministry for the Environment 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?* 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.³²

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 over 25 years since New Zealand last attempted to value its clean, green brand. It is well overdue to revisit and answer this important question so that decisions are made on complete information.

The Institute recommends that the 2001 report is updated and research is undertaken so the value of New Zealand's clean environment and 'pure' branding can be understood in the modern context.

15. There needs to be transparency on AI use.

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*.³³ Through this work, we learned a great deal about the risks and opportunities of applying AI in a government setting. We now have 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 (e.g. 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.

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

The Institute recommends the use of AI in the submission process for consultations such as this should be publicly available and transparent.

6.0 More 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?

7.0 Conclusion

The Institute recognises the Government's stated objective of improving the responsiveness and efficiency of New Zealand's fisheries management system. We also acknowledge that advances in electronic monitoring and data collection create opportunities to modernise some operational aspects of fisheries regulation. However, as set out in this submission, the Bill proposes a series of changes that, taken together, represent a material shift in the design and balance of the existing system and seriously risk threatening New Zealand's fish stocks.

Collectively, the proposed changes move the fisheries management framework away from transparent, easily understood sustainability constraints and toward a model that depends heavily on internal oversight, ad-hoc enforcement, and public trust in institutional judgement. The Institute is particularly concerned that reduced transparency around on-board camera footage, expanded discard permissions, removal of minimum size limits, and differentiated deemed value settings may cumulatively weaken the disciplining structure of the system. 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, economy, environment, trade and climate impacts. The Bill will have significant, possibly irreversible, implications for our communities, economy and natural environment. The Institute is especially concerned because of the climate and biodiversity stress already on 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 many countries don't: we are proud of our unique environment, its precious flora and fauna, its geographic isolation, our strong connection with the land and ocean, and our Treaty obligations – and we have high-quality seafood exports that profit from our clean, premium, sustainable brand. 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.

We want to be responsible stewards for the next generation, which includes maintaining healthy ocean systems. The proposals in this Bill fall short and do not allow for the long-term planning needed 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. We would recommend that instead of the proposed short-term, ad-hoc Bill, a stronger oceans policy reform is undertaken that works for a variety of objectives.

We encourage the Select Committee to assess the Bill not only on the basis of short-term operational efficiency, but through a long-term governance lens. New Zealand's fisheries management system must remain resilient to ecological uncertainty, political pressure, and technological change. Reforms must strengthen institutional integrity, preserve public trust, and ensure flexibility does not come at the expense of accountability or intergenerational stewardship.

The Institute recommends the Bill is not passed in its current forms and makes fifteen recommendations for consideration by the committee.

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*.

OneOceanNZ is a research project that aims to contribute to a wider discussion on how we might best manage our oceans, and exercise stewardship in order to maintain a healthy and productive ocean.

The project aims to identify cost-effective public policy solutions for ocean governance. Oceans are a public space and provide a critical resource for current and future generations. We rely on our marine ecosystems to purify the air, store carbon, grow food, ship products and provide habitats for marine life. The oceans' governance must therefore navigate a complex set of goals and objectives, and deliver cost-effective public policies that are measurable, transparent and able to be policed.³⁴

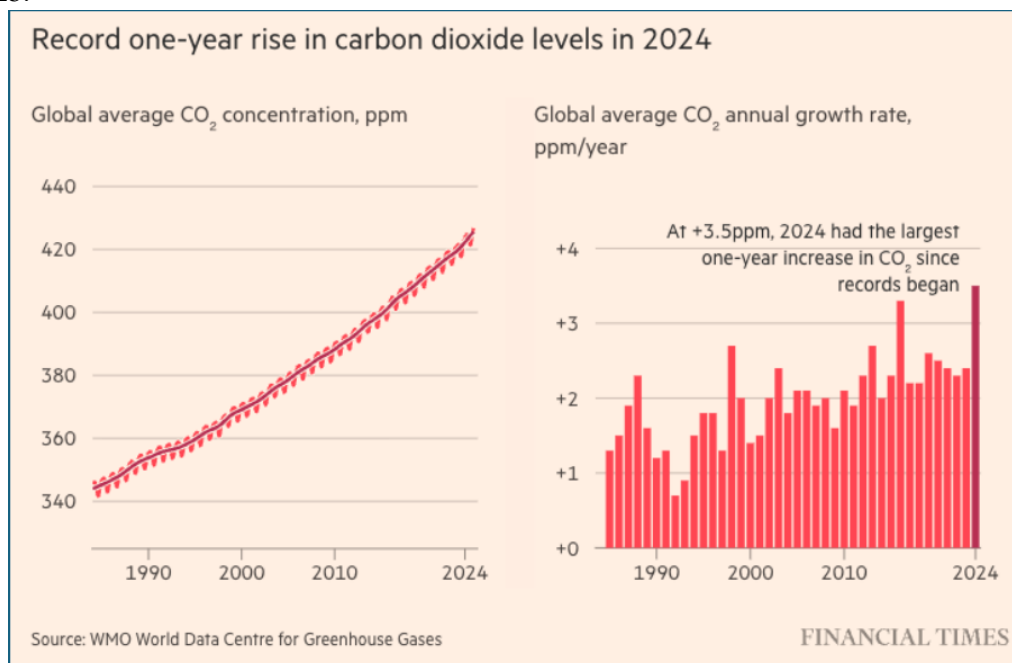
Appendix 2: The context

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 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*).³⁵

Source: Financial Times, *Extreme heat events rise in decade since Paris accord as CO₂ stays at record, studies say*, 2025.³⁶



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.'³⁷
- 'Extreme wildfire activity has more than doubled worldwide [in the last 21 years].'³⁸ 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].'³⁹
- '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.'⁴⁰

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.⁴¹ 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. 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. ⁴

CCPI points out:

- 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.⁴²

Like the rest of the world, New Zealand faces rising temperatures, changing weather patterns, and increased frequency and severity of extreme weather events. Ministry for the Environment has noted:

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.⁴³

We must both reduce our greenhouse gases and prepare for future climate-related risks. 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.

Appendix 3: 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.

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.⁴⁴ 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.⁴⁵

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 2016.⁴⁶ The purpose of the 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.⁴⁷

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 2030.⁴⁸ In 2025, the Government announced New Zealand's second NDC is to reduce emissions by 51–55% compared to 2005 levels, by 2035.⁴⁹

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 2030.⁵⁰

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.⁵¹

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.⁵²

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'.⁵³ 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'.⁵⁴

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