



Hon Penny Simmonds

Minister for the Environment

Hon Nicola Willis

Minister of Finance

Hon Andrew Bayly

Minister of Statistics

29 July 2024

Re: Improving New Zealand's environmental information

Dear Ministers,

Following your appointment last November, you received a Briefing for Incoming Ministers (BIM) from your respective Chief Executives regarding your portfolio. These documents provided an overview of key issues likely to confront you as incoming ministers. I take a very close interest in this correspondence, and I took it upon myself to write to the various Chief Executives of several central government agencies prior to the October general election to emphasise the critical issues that I believed should be included in the BIMs.

One of the central issues that I raised related to the quality of New Zealand's environmental data and information base. Access to high quality and comprehensive environmental data is integral for informing both the development and evaluation of almost all operational and policy decisions. Implications also extend to the budget process as information is required to assess the effectiveness of spending directed towards environmental outcomes and assuring ministers of value for money.

My investigations into the quality of New Zealand's environmental information have left me with little doubt that we are currently unable to effectively carry out these functions. Accordingly, I was somewhat alarmed that these issues were not raised by Stats NZ in its capacity as the Government's Chief Data Steward and leader of the Official Statistics System. However, Stats NZ was not alone. The importance of environmental information was not mentioned by the Treasury in the context of its system leadership role with respect to performance and accountability reporting. The Ministry for the Environment was the only agency that mentioned the foundational importance of environmental information in

terms of providing an evidence base to inform policy design, implementation and evaluation.

The implications of informational deficiencies extend beyond environmental management decisions. They also create challenges for New Zealand's budgetary and performance accountability system and the ability of parliamentarians to discharge their constitutional responsibilities. To enable effective scrutiny of government spending decisions, parliamentarians require granular environmental data to link spending on environmental initiatives to outcomes. The lack of detailed environmental information can prevent parliamentarians from engaging in such scrutiny and arriving at informed judgements regarding the effectiveness of spending. For example, without robust environmental information we won't be able to judge if costly actions and mitigations put in place are making a difference.

I have outlined to Parliament the dimensions of the problem in a number of reports:

- 2019 report: [Focusing Aotearoa New Zealand's environmental reporting system](#)
- 2020 report: [A review of the funding and prioritisation of environmental research in New Zealand](#)
- 2021 report: [Wellbeing budgets and the environment: A promised land?](#)
- 2022 report: [Environmental reporting, research and investment: Do we know if we're making a difference?](#)

Improved environmental information would have benefits across the economy. We are, in many respects, a biological economy, yet we lack vital information about the environment on which those industries depend. Better information would also help inform the work going into the growing risk that climate related disasters pose to the country's assets. The Infrastructure Commission has separately pointed to the lack of environmental information as a barrier to consenting infrastructure projects. The lack of information forces constant reinventing of the wheel as agencies pay for one-off studies. It would be far more efficient for NZ Inc to have publicly accessible environmental information across the country.

Officials from the Ministry for the Environment and other departments have been progressing a work programme to improve the quality, rigour and coverage of environmental information. But little action has been taken by ministers either to update the Environmental Reporting Act 2015 (ERA) or improve investment in the environmental data and information system. Yet almost five years have passed since my initial 2019 review.

Updating the ERA is long overdue, despite proposals being ready for enactment. This is a relatively low-cost exercise. Modest efficiency gains and cost savings could be achieved by implementing proposed changes clarifying the Act's purpose, changing reporting frequency, adding outlooks and drivers to the reporting framework and changing domain reports into commentaries. However, the real value would come from adding a government response to reports, establishing core indicators, adding enduring environmental outcomes and linking reporting to them. Those last three proposed changes are critical for determining whether

or not the Government is getting value for money from its environmental expenditure. We need to be able to answer the question: *are we making a difference?*

Changes to the ERA alone will not be sufficient given the glaring gaps and inaccessibility of environmental data in New Zealand. I must be frank: addressing those deficiencies will require significant investment over a period of years. I am conscious that it is unlikely in the short-term, but there is plenty of work that can be done in the meantime to ensure the foundations for a better environmental data system are in place. I know officials are working on ways to create a 'federated data system' that will be able to draw together the many disparate sources of existing information, make this information accessible, facilitate integration and allow gaps to be identified and prioritised.

Officials' efforts to date have not been afforded a level of priority commensurate with the challenges and risks that the deficiencies in New Zealand's environmental information system pose. Environmental information may not seem to be a pressing issue, but you should be in no doubt that the often-hidden costs of mounting environmental risks can be significant and pervasive.

I urge you to give greater priority to this critical issue by updating the ERA and continuing to lay the foundations for a federated environmental information system, so that when you are in a position to increase investment in the collection of environmental data, you will be able to do so effectively.

I will continue to monitor progress closely. I hope, next year, to issue a report on the opportunities that new technologies may offer to provide a step change in the quantity and quality of data. By the time I present you with that work, I hope you will be able to point to the commencement of the foundational work referred to above.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Simon Upton', written in a cursive style.

Simon Upton

Parliamentary Commissioner for the Environment
Te Kaitiaki Taiao a Te Whare Pāremata

cc:

Hon Chris Bishop, Minister for Infrastructure and Minister Responsible for RMA Reform

Hon Judith Collins, Minister of Science, Innovation and Technology and Minister for Digitising Government

James Palmer, Secretary for the Environment

Caralee McLiesh, Secretary to the Treasury

Mark Sowden, Government Statistician

Carolyn Tremain, Chief Executive of MBIE