



Hon Chris Bishop
Minister Responsible for RMA Reform

By email: chris.bishop@parliament.govt.nz; Cc: Hon Simon Watts, Minister of Local Government; Hon Nicola Willis, Minister of Finance

20 April 2026

Dear Minister

Re: Simplifying Local Government

I am writing to draw your attention again to the risks that could be posed to the management of water in New Zealand should reforms of local government lead to responsibility for river catchments being fragmented.

I wrote to you on 29 January 2026, noting that there were several integrated catchment management functions currently undertaken by regional councils that should not be further fragmented. That letter included the following paragraph:

“While unitary councils could provide an attractive solution, there is a real risk that ... CTBs will present you with proposals for many more unitary councils than the 17 regional entities you currently have. That could pose serious problems for functions, such as catchment management, that must not be fragmented. It would also run counter to the simplification your resource management reforms hope to deliver.”

I have received no reply to that letter and want to be clear about how important it is that water is managed at the level of a catchment. Catchment management not only needs to protect water as a community and environmental asset, but must also manage the risks water can pose through flooding. New Zealand has an enviable record of managing all manner of environmental and hazard risks at the level of a catchment. The productivity of our primary sector industries and the safety of our populations depend on good management of our water resources.

Handing the management of catchments to more than one local government entity would represent the biggest step backwards in New Zealand environmental management for more than half a century.

My advice is to make it clear that whatever new units of local government are settled upon, catchment management must **not** be fragmented. If you decide to approve unitary councils at scales below that of catchments, you should then either take the function back to central government or re-establish catchment boards. These existed between the end of the Second World War and 1989.

The first option would obviously shift costs from ratepayers to the Crown, but could make more efficient use of the technical skills needed to effect good catchment management.

The second option would scarcely qualify as ‘simpler’ local government. It would also create an artificial boundary between many elements of modern environmental management – but it would be preferable to a patchwork quilt of councils focused on fragments of catchments.

Overseas experience (e.g. Australia's Murray–Darling Basin) shows that splitting up catchments can lead to poor management of floods, water extraction and water quality. Problem resolution can be difficult, as there is inevitably disagreement over who is at fault and who should pay. Central government often ends up picking up the tab.

Regions, such as the Waikato and Canterbury, pose particular challenges with unified catchment management. I believe workable solutions are available, but central government must define the parameters – one of which is catchment integrity. I am copying this letter to your colleague, the Minister of Local Government, and to the Minister of Finance who will ultimately face the fiscal consequences of policy failure in this space.

I am, as always, happy to share with you and your colleagues the insights of this office.

Yours sincerely

Rt Hon Simon Upton
Parliamentary Commissioner for the Environment
Te Kaitiaki Taiao a Te Whare Pāremata