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

Strategic intentions
2026–2030

October 2026

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Parliamentary Commissioner for the Environment
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Strategic intentions

2026–2030

Presented to the House of Representatives pursuant
to section 39 of the Public Finance Act 1989

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



Cape Brett Track, Russell, Northland

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Te Āpiti Wind Farm, Woodville, Manawatū-Whanganui

About the Parliamentary Commissioner for the Environment

The Parliamentary Commissioner for the Environment (PCE) was established as an Officer of Parliament by Part 1, sections 4–27 of the Environment Act 1986 to review public agencies and processes to manage the environment, and to investigate environmental issues. The PCE provides Members of Parliament with robust independent advice about environmental matters.

Statutory functions

The PCE's functions are wide ranging. They are set out in section 16(1) of the Environment Act and can be summarised as follows:

a. With the objective of maintaining and improving the quality of the environment, review the system of agencies and processes established by the Government to manage the allocation, use and preservation of natural and physical resources, and report to the House of Representatives.

b. Investigate the effectiveness of environmental planning and management carried out by public authorities and advise them on remedial action.

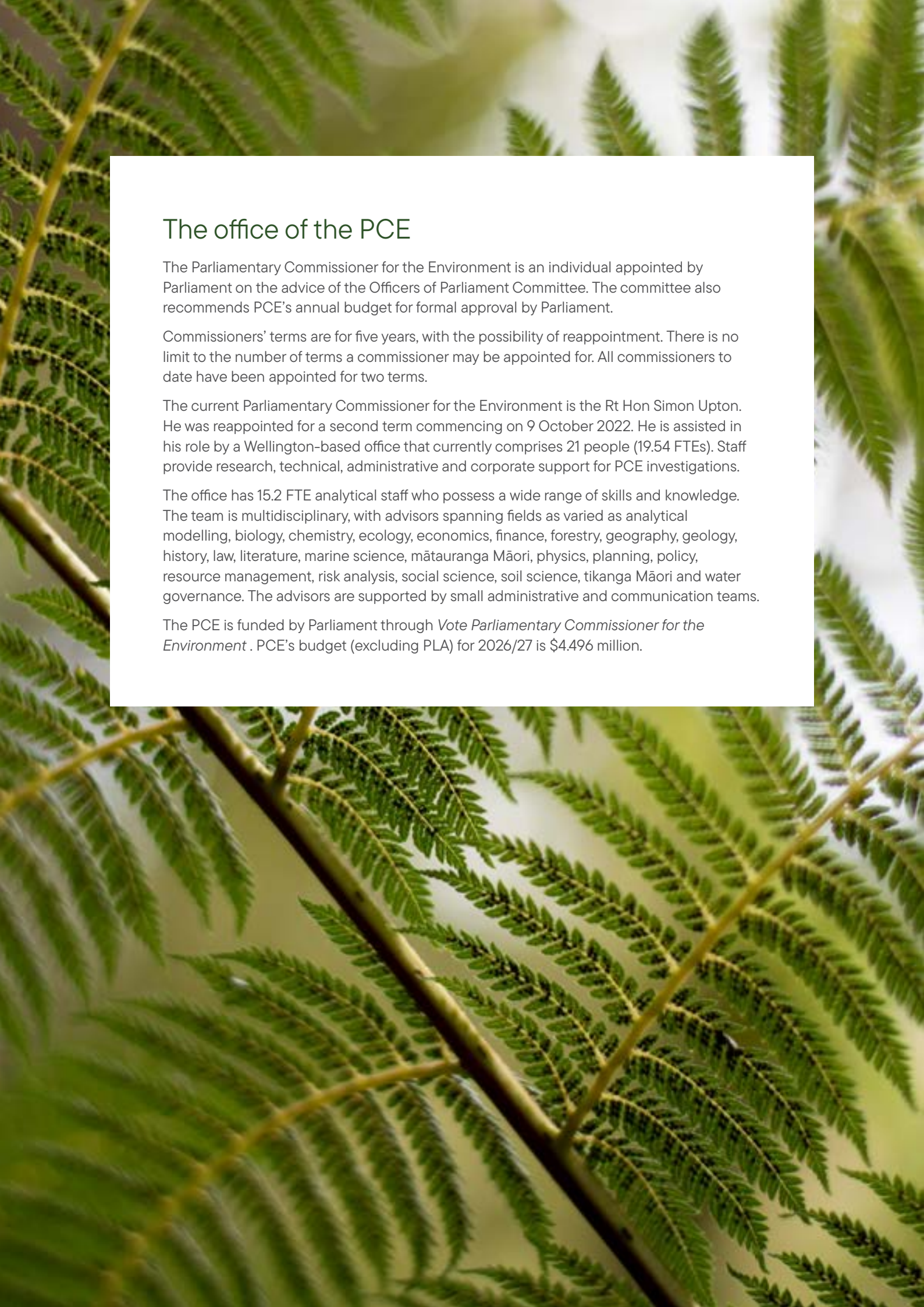
c. Investigate any matter where the environment may be or has been adversely affected, advise on preventive measures or remedial action, and report to the House of Representatives.

d. At the request of the House of Representatives or any select committee, report on any petition, bill, or other matter that may have a significant effect on the environment.

e. On the direction of the House of Representatives, inquire into any matter that has had or may have a substantial and damaging effect on the environment, and report to the House of Representatives.

f. Undertake and encourage the collection and dissemination of information relating to the environment.

g. Encourage preventive measures and remedial actions for the protection of the environment.



The office of the PCE

The Parliamentary Commissioner for the Environment is an individual appointed by Parliament on the advice of the Officers of Parliament Committee. The committee also recommends PCE's annual budget for formal approval by Parliament.

Commissioners' terms are for five years, with the possibility of reappointment. There is no limit to the number of terms a commissioner may be appointed for. All commissioners to date have been appointed for two terms.

The current Parliamentary Commissioner for the Environment is the Rt Hon Simon Upton. He was reappointed for a second term commencing on 9 October 2022. He is assisted in his role by a Wellington-based office that currently comprises 21 people (19.54 FTEs). Staff provide research, technical, administrative and corporate support for PCE investigations.

The office has 15.2 FTE analytical staff who possess a wide range of skills and knowledge. The team is multidisciplinary, with advisors spanning fields as varied as analytical modelling, biology, chemistry, ecology, economics, finance, forestry, geography, geology, history, law, literature, marine science, mātauranga Māori, physics, planning, policy, resource management, risk analysis, social science, soil science, tikanga Māori and water governance. The advisors are supported by small administrative and communication teams.

The PCE is funded by Parliament through *Vote Parliamentary Commissioner for the Environment* . PCE's budget (excluding PLA) for 2026/27 is $4.496 million.

Strategic outcomes sought

As an independent Officer of Parliament, the PCE's work is guided by the Environment Act, not specific outcomes set by the government of the day.

In 2022, the current Commissioner proposed that a set of six enduring environmental outcomes that span the entire reach of government be included in the Environmental Reporting Act.[1] They would help provide consistency of reporting and government action through time, and could form the basis for reporting and reviewing environmental expenditure under the Public Finance Act 1989.

Viewing *Vote Parliamentary Commissioner for the Environment* through the lens of those proposed outcomes, the main environmental outcome that the PCE's work contributes to is:

- improving the efficiency and effectiveness of institutions designed to manage human interventions in the environment.[2]

In providing advice to Parliament to contribute to that outcome, the PCE indirectly contributes to the other five proposed enduring environmental outcomes:

- reducing greenhouse gas emissions
- improving Aotearoa's biodiversity and ecosystem functioning and resilience
- improving Aotearoa's land and freshwater, including sustainable management of resources
- reducing pollution and waste
- improving Aotearoa's coastal and marine environment, including sustainable management of resources.

Contribution to achieving environmental outcomes

Outputs

Reports and advice (in the form of reports, submissions and letters) are the sole output class appropriated through *Vote Parliamentary Commissioner for the Environment*.

As an independent Officer of Parliament, the Commissioner reports to Parliament as a whole, not to a minister. Hence, the primary audience for the PCE's advice is Members of Parliament, including ministers and opposition spokespeople.

Other key audiences are the primary actors in the environmental management system, especially central government agencies, including the recently established Ministry for Cities, Environment, Regions and Transport, the Department of Conservation, the Ministry for Primary Industries, the Ministry of Business, Innovation and Employment, the Environmental Protection Authority and local government.

The PCE's remit focuses on reviewing the strengths and weaknesses of New Zealand's current environmental management system. Based on these reviews, he makes recommendations about ways that system can be improved to enhance environmental outcomes.

The PCE currently provides six key types of advice.

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1 PCE, 2022, Environmental reporting, research and investment: Do we know if we're making a difference? https://pce.parliament.nz/publications/environmental-reporting-research-and-investment

2 In this context institutions are defined as having a broad meaning that includes legislation and policy.

1 Proactive investigations on specific environmental issues

Investigations take a deep dive into a particular topic. These typically:

- explain how the issue affects the environment
- examine the science and current state of knowledge on the topic
- assess how, and how well, the issue is managed by New Zealand's policy and regulatory system
- make recommendations for improvement.

Examples include the management of land-use change to fit a changing landscape, the use of freshwater modelling to support the regulation and management of water, the management and drivers of forestry in New Zealand, and the use of the land-use capability system in a regulatory context.[3]

Since 2022, in addition to proactive investigations, the PCE has produced five estimates of environmental expenditure mapping annual government expenditure to the six enduring environmental outcomes mentioned above. This information is provided to Members of Parliament and others to enable them to better scrutinise public spending related to the environment. The PCE plans to continue these annual reports linked to the annual budget cycle.

2 Reactive advice on legislative bills

The PCE analyses proposed legislative changes to assess how what is proposed may impact on the environment and submits through the normal public process. A recent example is a submission on the Environment (Disestablishment of Ministry for the Environment) Amendment Bill.[4]

The PCE may also act as an adviser to select committees and provide independent advice and support to relevant parliamentary select committees. An example of this is the recent advice on the Planning and Natural Environment Bills, which at the time of writing are proposed to replace the Resource Management Act 1991. As an independent adviser to the Environment Committee, the PCE provided the committee with preliminary questions and advice, responses to the departmental report, and an adviser's report.[5]

In addition, following the committee's report back to the House, the PCE also wrote to all Members of Parliament with his reflections on the Planning Bill and Natural Environment Bill.[6]

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3 PCE, 2024, Going with the grain: Changing land uses to fit a changing landscape. https://pce.parliament.nz/publications/going-with-the-grain-changing-land-uses-to-fit-a-changing-landscape;
PCE, 2024, A review of freshwater models used to support the regulation and management of water in New Zealand. https://pce.parliament.nz/publications/a-review-of-freshwater-models-used-to-support-the-regulation-and-management-of-water;
PCE, 2025, Alt-F Reset – Examining the drivers of forestry in New Zealand. https://pce.parliament.nz/publications/alt-f-reset-examining-the-drivers-of-forestry-in-new-zealand;
PCE, 2025, Reviewing the use of the LUC system in a regulatory context. https://pce.parliament.nz/publications/reviewing-the-use-of-the-luc-system-in-a-regulatory-context

4 PCE, 2026, Submission on the Environment (Disestablishment of Ministry for the Environment) Amendment Bill. https://pce.parliament.nz/publications/submission-on-the-environment-disestablishment-of-ministry-for-the-environment-amendment-bill

5 PCE, 2026, PCE Analysis of the Planning Bill and Natural Environment Bill. https://pce.parliament.nz/publications/pce-analysis-of-the-planning-bill-and-natural-environment-bill

6 PCE, 2026, PCE Note to Members of Parliament: Planning Bill and Natural Environment Bill. https://pce.parliament.nz/publications/pce-analysis-of-the-planning-bill-and-natural-environment-bill

3 Reactive submissions on proposed policy changes

The PCE sometimes comments on government policy proposals when public submissions are invited in government consultation documents. Given the large number of government consultations, the PCE is selective about what he submits on. Submissions are generally limited to topics previously investigated, where value can be added or a different perspective can be provided. A recent example is the submission on the Simplifying Local Government proposals.[7]

4 Reactive commentaries, reviews or evaluations

From time to time the PCE may choose to comment on a specific report or a project. The Environmental Reporting Act has a specific provision encouraging the PCE to comment on State of the Environment reports. Since the enactment of the Fast-track Approvals Act 2024, the PCE has chosen to provide commentary to some Fast-track Approvals Panels considering applications for specific projects under that Act.

5 Selected public concerns about the environment

Regular correspondence from members of the public about concerns they have for the environment is one channel through which the PCE keeps abreast of environmental issues that are emerging or being ignored. While not every concern can be responded to substantively, where he judges he can help move a specific issue forward or improve the system more generally, the PCE will investigate the matter at stake and make recommendations for relevant ministers, government agencies or local bodies to address.

6 Correspondence with ministers and other Members of Parliament

To help ensure his recommendations are acted on, the PCE regularly follows up by writing to and meeting with ministers and other Members of Parliament. Correspondence with ministers is also used to raise concerns about particular environmental issues that the PCE has concerns about (e.g. construction of a liquefied natural gas (LNG) import facility) or those raised by the public (e.g. air quality guidelines).[8]

Major investigations are formally presented to Parliament. After presentation to the House of Representatives, they are published on the PCE website. The website also displays formal submissions, communications and correspondence. Some of the work is also communicated through media and select social media channels.

The PCE's current and future work programme, as well as recent publications, can be found on the PCE website (www.pce.parliament.nz). [9]

7 PCE, 2026, Submission on the Simplifying Local Government: A draft proposal consultation document. https://pce.parliament.nz/publications/submission-on-simplifying-local-government-a-draft-proposal-consultation-document

8 PCE, 2026. PCE letter to Minister Watts on the importation of LNG. https://pce.parliament.nz/publications/letter-to-minister-watts-on-the-importation-of-lng;
PCE, 2025. PCE letter to Minister Watts on public funding of LNG import terminal. https://pce.parliament.nz/publications/letter-to-hon-simon-watts-on-public-funding-of-lng-import-terminal;
PCE, 2023 and 2024. Correspondence with Ministers on air quality regulations (PCE letter to Minister Parker regarding air quality regulations, PCE letter to Minister Simmonds regarding air quality regulations). https://pce.parliament.nz/publications/correspondence-with-ministers-on-air-quality-regulations

9 See https://pce.parliament.nz/our-work/current-work and https://pce.parliament.nz/pre-publications.

Other work

In performing his functions, the PCE can also:

- review the performance of environmental agencies
- become a party to environmental litigation
- promote education materials about environmental issues.

Over the past two years there has been a period of considerable upheaval in the environmental management system. Under section 16 of the Environment Act, one of the PCE's roles is to review the impact of these changes. The programme of legislative, policy and structural change happening in the environmental management system has required a considerable shift in resources from the traditional proactive investigations into specific environmental issues to more reactive advice on proposed legislation and policy changes. The PCE has also been asked to be more involved in processes, from assisting the Environment Committee with resource management reform through to project applications under the Fast-track Approvals Act and public inquiries of an increasingly complex nature. It is too soon to tell if these changes are a temporary blip or a longer-term trend, perhaps arising from reduced public involvement in various processes.

Over the next four years (the horizon of this document) the PCE intends to continue to explore ways to support select committees in their work on legislation and scrutiny of public expenditure. He will also consider whether PCE can add value through more active engagement with legal proceedings.



Tararua peaks, Tararua Forest Park, Wellington

Prioritisation

The broad mandate provided by the Environment Act 1986 requires the Parliamentary Commissioner for the Environment to exercise a significant measure of discretion in deciding what to investigate within his limited resources. The PCE tries to focus on issues where his skills and independence can add value and which avoid duplicating work being undertaken elsewhere.

The broad prioritisation approach that is actively applied to proactive investigations is twofold.

The PCE may choose to investigate emerging issues that are not yet in the spotlight, or issues that are challenging and on which progress is proving difficult. Work on these topics can alert relevant agencies and the wider community to problems that may need more sustained attention. He is more selective about issues that appear to be in hand and already have stakeholder attention. His engagement with environmental issues, such as water quality and climate change, are examples of issues that have proved problematic and seem to be almost permanently on the agenda. In these cases, the hope is that some independent analysis from a fresh angle can help move the debate forward (Figure 1).

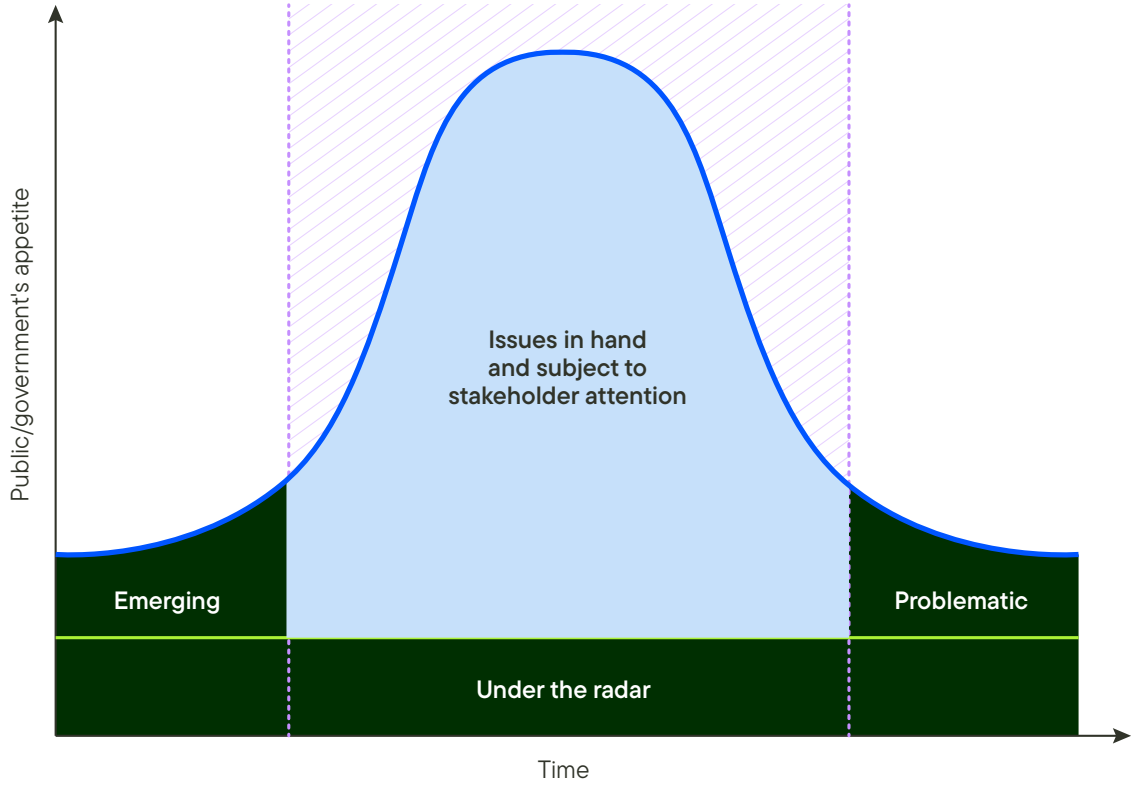


Figure 1: Schematic representation of the Parliamentary Commissioner for the Environment's prioritisation framework. The dark green areas indicate problems that may need more sustained attention. The PCE is more selective about issues that are in hand and already subject to stakeholder attention (light blue area).

Te ao Māori

At the heart of te ao Māori is the interconnectedness of all things, and a relationship with the environment that takes a holistic approach to environmental wellbeing. Acknowledging this, the PCE incorporates te ao Māori perspectives into his investigations and advice where appropriate as a core part of his work, rather than an add on. For example, as part of the investigation into land use change, staff worked directly with local iwi and hapū to highlight their approaches and how they complement other Western approaches.[10] The freshwater modelling review included a chapter on Māori models. It built on a commissioned piece of work to review models developed by, or in close collaboration with, mana whenua and Māori entities to manage freshwater.[11] More recently, a report detailing mana whenua involvement in, and their perspective on, the management of the Asian paddle crab incursion in the Tauranga Harbour/Te Awanui has been commissioned for the forthcoming PCE review of marine biosecurity.

Incorporating te ao Māori requires staff to engage with concepts and practices that may be unfamiliar to them but are critical to do justice to the interests of iwi Māori in tendering any advice or recommendations concerning te taiao. The PCE seeks a workplace where staff can develop their cultural competencies and feel confident including the insights te ao Māori has to offer in their work.

Impact

There is no legal obligation on the part of the Government or any stakeholders to implement the PCE's advice. The acceptance and effectiveness of his advice therefore depends to a large degree on its:

- **independence** – ensuring the analysis and advice is free from political bias and external influence
- **credibility and integrity** – using robust evidence-based analysis to make pragmatic recommendations that balance what can be achieved in both the short and long term
- **usefulness** – to be useful, PCE advice and reports need to be:
  - clear, well written, and in an easy-to-understand language and format
  - delivered at a time that can contribute to decision making and before it is too late to influence the outcome
  - relevant to environmental issues that are making, or will make, claims on the Government's and the public's attention.

10 PCE, 2024. Exploring land use change under different policy settings in two case study catchments. https://pce.parliament.nz/publications/exploring-land-use-change-under-different-policy-settings-in-two-case-study-catchments

11 PCE, 2024. A review of freshwater models used to support the regulation and management of water in New Zealand. https://pce.parliament.nz/publications/a-review-of-freshwater-models-used-to-support-the-regulation-and-management-of-water

How performance is measured

As an advisory body, the Parliamentary Commissioner for the Environment has very little control over the uptake of recommendations made to ministers, government agencies or select committees. It is even more difficult to attribute the PCE's recommendations to improvements in the actual environment because the implementation of any recommendations made is carried out by third parties (e.g. government agencies, local government or through regulating the actions of others).

Key performance measures therefore focus on parliamentarians' perceptions of the quality of the PCE's work – that is, the factors that influence decisions (see above) rather than directly impact on the strategic outcome. Other performance measures are designed to ensure the way the PCE approaches his work programme is balanced, responsive and meets legal requirements.

Table 1 sets out the proposed performance measures for 2026–2030. Table 2 sets out past performance measures that will no longer be reported against.



Waimakariri River, Canterbury

Table 1: Parliamentary Commissioner for the Environment's performance measures for 2026–2030

Measure	Explanation of measure	Reason for change from 2023–2027	How measured	Target	Explanation of target
Select committee reports indicate that PCE reports are useful.	Indicates how the PCE's primary audience assesses the work.	No change proposed.	Analysis of commentary in select committee reports on PCE reports.[12]	All reports useful.	As a primary audience, all PCE reports should be useful to select committees. This should be evident from the commentary in committee reports to Parliament on PCE reports.
Number of briefings given to Members of Parliament during the year.	Shows productivity in connecting with key audience.	No change proposed.	Tally of Commissioner's meetings with MPs (sourced from the Commissioner's diary).	30	This measure shows that the PCE is deliberately engaging with his key audience. While a specific target for number of meetings does not have particular relevance, it is used to set an expected level of activity.
Proportion of recommendations from proactive investigation reports that are adopted or partially adopted during the tenure of the current Commissioner.	Shows the impact of the PCE's work in changing the environmental management system.	Change to split proactive outputs from reactive ones and better reflect recommendation uptake informed by data since 2008.	PCE staff assessment of government decisions relevant to the PCE's past recommendations.[13]	65%	Target set deliberately middling to encourage challenging but realistic recommendations, and to discourage preferencing recommendations that are easy to implement. This is an aggregate measure as most recommendations take time (months to years) to implement. Annual uptake is therefore not meaningful. Target recommendation response rate is informed by data since 2008.
Proportion of recommendations from reactive outputs (submissions, letters, commentaries) that are adopted or partially adopted during the tenure of the current Commissioner.	Shows the impact of the PCE's work in changing the environmental management system.	Change to split proactive outputs from reactive ones and better reflect recommendation uptake informed by data since 2008.	PCE staff assessment of government decisions relevant to the PCE's past recommendations.[14]	50%	Target set deliberately middling to encourage challenging but realistic recommendations, and to discourage preferencing recommendations that are easy to implement. This is an aggregate measure as most recommendations take time (months to years) to implement. Annual uptake is therefore not meaningful. Target recommendation response rate is informed by data since 2008.
Reports are externally peer reviewed and content checked.	Shows robustness of the PCE's advice through independent expert review.	No change proposed.	Percentage calculated from PCE records of review contracts per report.	100%	Ensures all major reports are reviewed externally to improve robustness.
Public concerns and information requests are responded to within required time frames.	Shows that PCE takes concerns raised by the public seriously.	No change proposed.	Calculated from when PCE received concern to when first response given.	100%	Ensures PCE staff are responsive to concerns raised by the public.

Table 2: Parliamentary Commissioner for the Environment's performance measures from 2023–2027 to be deleted

Measure	Explanation of measure	Reason for deletion
Number of reports, commentaries, reviews, evaluations and submissions published during the year.	Shows productivity of the PCE	A significant number of government reforms and a considerable programme of legislative, policy and structural change required a shift in the way the PCE operates. This included increasing the number of outputs in response to proposed changes to the environmental management system. As a result, this KPI is now considered no longer useful.

12 The detailed methodology for this analysis can be described as the following process: Select committees publish reports for the House of Representatives on their examination of PCE investigations. Committee examinations may extend over several years, with final reports on (typically) up to three PCE investigation reports published each calendar year. Each July an examination is made of the committee reports published during the previous financial year, checking that all reports were deemed useful. This usefulness is evidenced by comments such as a Minister or the House being encouraged to take note of the findings. Note, however, that some years there may be no committee reports published within the financial year, committees choosing to publish before 1 July one year and after 30 June the next. In this case, the KPI would have to be n/a for that financial year.

13 This analysis will be undertaken for proactive reports, with separate reporting in annual reports for proactive reports and reactive advice.

14 This analysis will be undertaken for reactive advice (submissions, letters, commentaries), with separate reporting in annual reports for proactive reports and reactive advice.



Statement of responsibility

In signing this information, I acknowledge that I am responsible for the information about the strategic intentions for the Parliamentary Commissioner for the Environment. This information has been prepared in accordance with section 38 of the Public Finance Act 1989.

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