



Rt Hon Christopher Luxon
Prime Minister
Parliament Buildings
Wellington

17 March 2025

Dear Prime Minister

I am writing in connection with major reforms your government has announced in respect of publicly funded and delivered research.

Under the Environment Act 1986 I am charged, *inter alia*, with keeping under review the system of agencies and processes established by the Government to manage our environment. Your announced changes to the way the Government carries out research have potentially far-reaching consequences for environmental management.

Environmental research is the absolute bedrock and foundation of environmental management. Without it, we do not know what we are doing or whether what we are doing is making a difference. The success of our environmental research is of real economic and social moment. That is particularly so given the biological nature of many of our industries.

The report of the Science System Advisory Group (SSAG) chaired by Sir Peter Gluckman provided your government with a coherent and compelling account of the rationale for the Crown's various research endeavours. It correctly identified the fact that research is not a homogeneous activity. It is conducted for different reasons in different ways and in different places. Sir Peter's identification of four classes of research that merit distinct consideration – stewardship, policy-focused, knowledge-generating and exploitable research – provides a sound basis for asking why we do the research we do. Environmental research certainly finds a justification in the first three of these.

None of the clarity which Sir Peter's analysis brought to the task has been reflected in announcements by the Government to date. Instead of a careful delineation of the different types of public research that we need to conduct and announcements on how those different types of research should be prioritised and funded, we have been presented with a reorganisation of research institutions that bears no relationship to the SSAG report. Form has triumphed over function.

There may be a case for institutional reform (although what has been announced bears no relation to Sir Peter's advice). But the only justification offered so far has been to drive economic growth and increase the commercialisation of research output. This is, without doubt, a worthy goal. But it is not the only reason the Crown invests in research. Even the most minimal view of the role of the state generally accepts that there are domains of public good research that are a legitimate claim on the taxpayer. Understanding the biophysical environment is one of them, as are health, demography and social trends.

I have already detailed to Mr Reti, your Minister of Science, Innovation and Technology, my concerns about the risks that the proposed reorganisation of CRIs may pose for environmental research. The documentation to support that announcement makes no reference to the significance of environmental research. I am concerned that it will be similarly neglected in the reforms that remain to be announced. I understand that these include priority setting through a Prime Ministerial Science Technology and Innovation Advisory Council (PMSTIAC) and funding mechanisms are in the pipeline.

It is critically important that your government has a clear view of how you intend to prioritise and deliver environmental science. Like your social investment approach, environmental management requires a solid evidence base. The success of entire fields of policy reform such as that proposed by Minister Bishop for resource management, will sink or swim depending on the quality of our environmental research. The granular, high-quality information needed to monitor vital assets like water and soil relies on sustained research that cannot be turned on and off.

The same applies to biosecurity, natural hazards, the defence of our biodiversity against pests and weeds and our ability to vouch for the quality of the environment in which we grow so much food for export. In each of these cases, research investments play a critical role in avoiding the losses that can accrue from natural disasters, climate change and animal and plant diseases.

I have studied the problems facing the environmental research sector closely including the lack of strategic prioritisation and the deeply flawed and excessively competitive funding system currently in place. I have also pulled apart in some detail where current environmental research funds are being spent – something that the existing bureaucracy is not set up to advise on. In short, my concerns are not uninformed ones.

The issues I am raising reach far beyond the responsibilities of the Minister of Science, Innovation and Technology. That is why I am writing to you, as Prime Minister. The science and research system informs almost all of what the Government does – national security, the economy, health, social services, and the environment. While each aspect does not have to be served equally or in the same way, each needs a reasonable level of support from the science system to effectively and efficiently manage the breadth of the Government's responsibilities.

The establishment of the PMSTIAC will place your office at the apex of future research planning. That could be an excellent thing for research and innovation but only if it recognises that the need for research, as detailed by Sir Peter, is understood in a wider frame than just promoting economic growth. I would also observe that there is no need for publicly funded research to be all prioritised and funded in the same way.

The contribution that environmental research makes to New Zealand appears to have been neglected in the decisions that have been announced thus far. If that continues to be the case, the Government's ability to effectively manage large areas of the economy and society will be undermined. I am writing to you prior to any further decisions being taken so that these issues can be taken into account. I would like to meet with you to discuss the matter.

Yours sincerely

A handwritten signature in dark ink, consisting of a long, sweeping horizontal stroke followed by a vertical line and a small horizontal tick at the top.

Rt Hon Simon Upton

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