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Environment Committee
New Zealand Parliament
Wellington

11 March 2026

Submission on the Environment (Disestablishment of Ministry for the Environment) Amendment Bill

1. World Wide Fund for Nature New Zealand (WWF) is one of the leading environmental Non-Governmental Organisations (eNGOs) in New Zealand. We support science-based, pragmatic solutions that enable a future where people live in harmony with nature.
2. WWF appreciates the opportunity to make a submission on the Environment (Disestablishment of Ministry for the Environment) Amendment Bill to the Environment Select Committee.
3. We acknowledge that the Bill does not alter the primary functions of the Ministry for the Environment (MfE). However, our key concern is that these functions will be compromised when the secondary legislation (made under the Public Service Act 2020) is used to establish the Ministry of Cities, Environment, Regions and Transport (MCERT). Integrating environmental oversight with strong development, cities and transport mandates risks creating structural conflicts that weaken the Ministry's core environmental protection functions and mandate.
4. New Zealand's biodiversity is in crisis. We have one of the highest rates of extinction in the world per capita, driven largely by habitat loss, pollution and cumulative environmental pressures. The functions administered by MfE are essential safeguards for nature. They must not be diluted or overridden by competing goals relating to urban development, infrastructure or roading expansion.
5. Nature underpins New Zealanders' health, wellbeing, climate resilience and economic prosperity. Primary industries contribute around 7% of GDP¹ and tourism contributes 3.7% of GDP.² Both depend on healthy ecosystems and landscapes. Future generations will already face costly environmental externalities from today's actions. Decisions by the new Ministry must therefore prioritise environmental foundations on which industries rely, to safeguard the wellbeing and livelihoods of Aotearoa New Zealand into the future.
6. The Environment Act 1986 sections 17 and 32 requires MfE to have regard to a suite of matters,³ including, for example:
 - a. The maintenance and restoration of ecosystems of importance, particularly those supporting habitats of rare, threatened, or endangered species;
 - b. Landscapes;
 - c. Areas of importance to tangata whenua;

¹ <https://wwf.org.nz/sites/default/files/2024-11/A%20Nature%20Positive%20Aotearoa.pdf>

² <https://www.stats.govt.nz/information-releases/tourism-satellite-account-year-ended-march-2023/>

³ <https://www.legislation.govt.nz/act/public/1986/0127/latest/dlm98975.html>

- d. Pollution;
 - e. Natural hazards and risk reduction;
 - f. Hazardous substances;
 - g. Whether proposals or policies may have environmental effects that are uncertain and require further investigation, or lead to the allocation or depletion of natural resources at a rate that prevents natural renewal or undermines transition to alternatives; and
 - h. Short term, long term, direct, indirect or cumulative effects on the environment.
7. These matters collectively constitute core environmental stewardship duties. Depending on how MCERT is formed and mandated, retaining these functions with equal weight alongside major new urban, infrastructure, and transport functions will be extremely challenging. For example, ecosystem management or protection could be deprioritised where it constrains road construction or housing development.
 8. As the Bill does not strengthen or clarify the importance of these environmental functions within the new Ministry, substantial uncertainty remains as to how conflicts between development and environmental protection will be resolved. Without explicit safeguards, the environmental mandate risks becoming secondary to the new Ministry's development-focused functions.
 9. Aotearoa New Zealand's natural environment is globally unique. Our endemic species and distinctive landscapes require careful management, strong regulatory oversight, and clear institutional accountability to prevent further decline. For the new Ministry to be effective, its mandate must explicitly uphold environmental outcomes as a primary duty, not an optional consideration.
 10. WWF-New Zealand supports government structures that deliver strong, clear, and effective environmental protection. Clear articulation of the Government's objectives across the environment, housing and transport portfolios could also achieve integration, alignment and efficiencies, without the creation of MCERT or the disruptive organisational changes proposed. Combining environment with major development portfolios poses significant risks to environmental integrity unless safeguards are explicitly embedded in the legislation.
 11. For these reasons, we oppose both the Bill and the related merger between the Ministries for the Environment, Housing and Urban Development and Transport, and local government functions of the Department of Internal Affairs.
 12. If the merger is to proceed, WWF-New Zealand recommends that the Committee:
 - a. **Strengthen the Bill to ensure environmental functions and powers cannot be diminished**
There should be explicit legislative direction that environmental protection, biodiversity, and ecosystem health are prioritised within the new Ministry's purpose, functions and powers. This would remove the risk that the environmental functions currently held by MFE could be eroded through the secondary legislation establishing MCERT or through organisational restructuring.
 - b. **Ensure that the Secretary for the Environment retains an independent, authoritative role**
The Secretary must be empowered and required to provide free and frank environmental advice, with advice from staff with appropriate environmental expertise within the Ministry, and without pressure from competing mandates within the Ministry.

c. **Enhance transparency and accountability mechanisms**

Annual reporting, statutory environmental limits, and independent oversight should be strengthened to ensure environmental outcomes are not compromised.

13. We urge the Committee to ensure that the Bill and associated secondary instruments reaffirm the centrality of environmental protection to the new Ministry's purpose and functions.