



Submission of **SAFE**: The Environment (Disestablishment of Ministry for the Environment) Amendment Bill

To: Environment Select Committee
11 March 2026

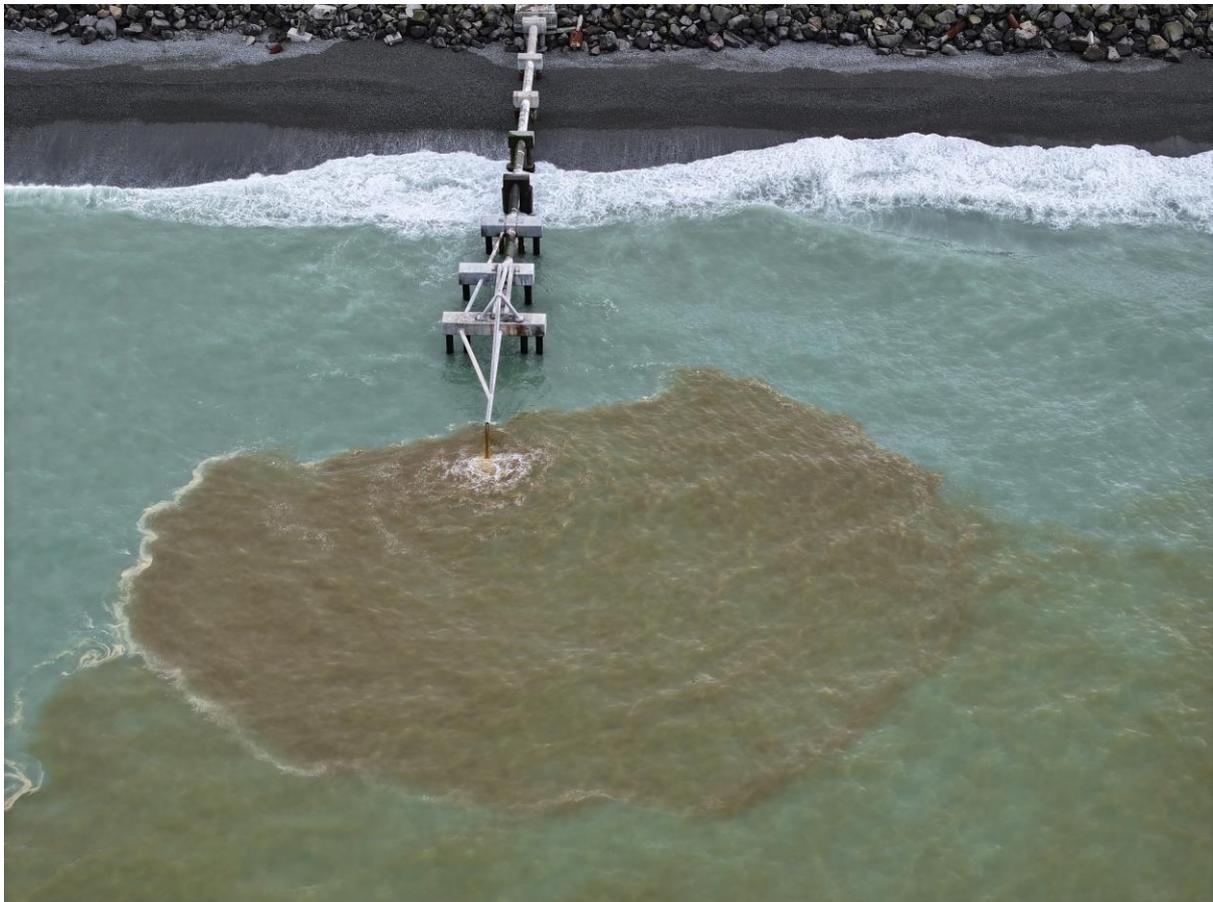


Photo: Runoff from Silver Fern Farms Slaughterhouse in Pareora.

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1. About SAFE

SAFE (Save Animals from Exploitation) is New Zealand's leading animal rights organisation. Our goal is to inspire institutional, political, and societal shifts that reduce animal suffering, improve their lives, and ultimately, end their exploitation. SAFE represents the views of tens of thousands of New Zealanders who support stronger protections for animals.

2. Executive summary

The Environment (Disestablishment of Ministry for the Environment) Amendment Bill proposes a setback in New Zealand's environmental policy. The intention of this Bill is to restructure the governing bodies of New Zealand without adequate consultation or sufficient supporting evidence to effectively reduce the functions of the environmental body.

New Zealand has long held an international reputation for being an environmentally focussed nation, with nature spots and 'green living' drawing in crowds of tourists each year. Combining the Ministry for the Environment with the Ministry of Transport and the Ministry of Housing and Urban Development minimises the importance of a vast and diverse natural ecosystem to merely a consideration point of architectural developments.

This controversial move has the potential to significantly slow processes of environmental policy and research, weaken the strength of research and reduce the overall voice on environmental threats. The combination of ministries will blur the lines between the specialised focus of each ministerial branch.

Executive branches in New Zealand need clarity and efficiency to make achievements in their work. It is not a question of putting one branch above another, it is about refining our branches into individual entities who can achieve their goals with a clear focus and efficiency. Under the new Amendment Bill, the Ministry for the Environment will lose the opportunity to work in a streamlined and centred manner on environmental matters.

Akin to SAFE's interests in representing animals, the interests of the natural environment are represented and advocated for through people. SAFE believes that protection of the environment is imperative to mitigate climate concerns, provide healthy living conditions and accessible recreational amenities for people, and to ensure all animal and insect life is able to thrive.

It is the responsibility of the Government to implement policies that uphold the wellbeing of all life – i.e. human and non-human life – in New Zealand. SAFE does not believe the proposed Amendment Bill achieves this purpose as it undermines the fundamental interest of human and non-human animal to live in a safe and healthy natural environment.

3. Recommendations

SAFE urges the select committee to reject the Environment (Disestablishment of Ministry for the Environment) Amendment Bill in its entirety.

1. Reject the Bill outright

The committee should recommend that the Amendment Bill does not proceed as it removes one of the executive government structures that is fundamental to environmental protection in New Zealand.

The proposed Amendment Bill is inconsistent with New Zealand's interests in maintaining its status as an environmentally progressive nation, and undermines democratic procedure by removing executive branches of government bodies that provide evidence-based recommendations with the objective of protecting New Zealand's natural environment and ecosystems.

2. Reaffirm the purpose of independent ministries

The select committee should reaffirm the purpose of Ministry for the Environment and its vital function in New Zealand's governance system.

The Ministry for the Environment was established under the Environment Act 1986 to advise the Government on issues such as climate hazards, natural resources, ecosystems and establishes the intrinsic value of the environment.¹

Key areas of Ministry for the Environment include protecting natural environments such as waterways, incentives for increased biodiversity, and societies with well-balanced environments and ecosystems that protect natural resources and look to sustainable futures.²

Previously, these initiatives have been utilised to protect and strengthen the longevity of New Zealand's natural environment whilst appropriately informing the government of major risk factors.

The select committee should therefore recommend that the Government retain the established Ministry for the Environment as an independent, specialised ministry, reaffirming its purpose of overseeing and protecting New Zealand's unique ecosystems and biodiversity, free from undue influence from other sectors such as infrastructure and transport.

SAFE further recommends the Select Committee reaffirms that the purpose of the Ministry for the Environment is to provide information and recommendations to the government that are environmentally beneficial to the majority of New Zealander's. It is the duty of elected officials to represent their constituents over their personal biases, and retain ministries that allow them to do this without conflict or overshadowing issues that compete with environmental protection.

3. Uphold evidence-based decision making

The Select Committee should reject the proposed Amendment Bill on the grounds there is no evidence to suggest this merging of ministries will be beneficial for New Zealand.

¹ Ministry for the Environment. (2023) "About Us". Accessed 5 March 2026. <https://environment.govt.nz/about-us/ministry-for-the-environment/>

² Ministry for the Environment. "What Government is Doing". Accessed 5 March 2026. <https://environment.govt.nz/what-government-is-doing/areas-of-work/>

Under the 'Departmental Disclosure Statement' for the proposed Amendment Bill, the Ministry for the Environment confirms there are no evidence-based reports and communication with parties of interest to enact this change.³ Reports given under the disclosure statement are meant to identify background information (including statistics, personal opinions from relevant third parties, and qualitative analysis) that gives evidence to or justify the decision of creating a proposed new amendment. Changing the structure of New Zealand's ministerial branches without evidence is misguided and could put New Zealand's environment at significant risk of being undervalued in future policy.

4. Extend the consultation period

The proposed Amendment Bill is being advanced at a pace that mirrors the use of 'urgency', despite not being labelled as such, and this has severely compressed the consultation period.

We urge the Select Committee to recommend a minimum consultation period of six weeks to provide a suitable timeframe for input from key stakeholders, for example environmental experts, ecologists, non-governmental organisations (NGO's) and sustainability specialists.

4. International evidence; ministries

Worldwide Ministries for the Environment exist in every continent to provide governments with a clear way forward in environmental-based policy.

The majority of these ministries work in conjunction with other natural resource-based ministries.

Example 1: The Ministry of Water [Resources] and Environment; these can be seen in Uganda⁴, Bulgaria⁵.

Example 2: Ministry of Environment and Natural Resources or Climate; these can be seen in Guatemala⁶, Iceland⁷ and Malaysia⁸.

Example 3: An addition of ecology-based ministries; these can be seen in China⁹ and Azerbaijan¹⁰.

Example 4: On occasion this strays as far as a Ministry for the Environment and Tourism; evidenced in the Maldives¹¹.

New Zealand would be the first to combine the environmental Ministry of Transport and the Ministry of Housing and Urban Development to create the Ministry of Cities, Environment, Regions and Transport (MCERT).

³ Ministry for the Environment. (2026). "Departmental Disclosure statement". Accessed 5 March 2026. <https://disclosure.legislation.govt.nz/assets/disclosures/bill-government-2026-249.pdf>

⁴ Ministry of Water and Environment. Accessed 5 March 2026. <https://www.mwe.go.ug/>

⁵ Ministry of Environment and Water. Accessed 5 March 2026. <https://www.moew.government.bg/en/>

⁶ Ministerio de Ambiente y Recursos Naturales. Accessed 5 March 2026. <https://www.marn.gob.gt/>

⁷ Ministry of the Environment, Energy and Climate. Accessed 5 March 2026.

<https://www.government.is/ministries/ministry-of-the-environment-energy-and-climate/>

⁸ Ministry of Natural Resources and Environmental Sustainability. Accessed 5 March 2026.

<https://www.nres.gov.my/en-my/Core/Pages/default.aspx>

⁹ Ministry of Ecology and the Environment of the People's Republic of China. Accessed 5 March 2026.

<https://www.mee.gov.cn/>

¹⁰ The Ministry of Ecology And Natural Resources of Republic Of Azerbaijan. Accessed 5 March 2026.

https://www.azerbajians.com/content_516_en.html

¹¹ Ministry of Tourism and Environmnet. Accessed 5 March 2026. <https://www.environment.gov.mv/v2/en/>

This is not a first that would place New Zealand at the forefront of cabinet evolution; it would be a symbolic shift away from progress and development that aims to acknowledge and honour the environment as a qualitatively valuable asset to and for all life.

The United Nations Environment Programme echoes the call for a future that prioritises environmental development over economic and infrastructure growth.

“The Global Environment Outlook lays out a simple choice for humanity: continue down the road to a future devastated by climate change, dwindling nature, degraded land and polluted air, or change direction to secure a healthy planet, healthy people, and healthy economy. This is no choice at all” - Inger Andersen, UNEP Executive Director.¹²

The Global Environment Outlook, Seventh Edition: A Future We Choose” published by the UN in 2025 states that the world needs to look beyond GDP as a measure of wellbeing and look towards circular economy models that track human health, expand protected areas and restore degraded ecosystems.¹³

It is critical that any parliamentary restructure set out to develop progressive and strategic branches that operate effectively as a representative for issues on which they are directly linked without sacrificing their core business or objectives. The combination of the four ministries as proposed through this Bill would not achieve this and instead would gravely sacrifice the ability for each ministry branch to act with integrity and focus on departmental specific issues.

Internationally it is becoming more relevant to establish additional executive bodies alongside environmental ministries that focus on earth-focussed concerns such as climate and energy policy. Denmark¹⁴, Canada¹⁵ and Sweden¹⁶ are examples of this, emphasising the global movement towards sustainable futures.

It is disheartening to SAFE that the Coalition Government seeks to undermine global progress by disestablishing the independent the Ministry for the Environment and positioning New Zealand as out of step with international progress.

Aotearoa is already confronting significant environmental challenges - from climate change and extreme weather events threatening Kiwi homes and livelihoods, to warming oceans, accelerating habitat loss, endangered species, and the damage caused by animal agriculture. It is imperative New Zealand retains the Ministry for the Environment as an independent ministry with the crucial role of shaping New Zealand’s environmental policies and practices.

¹² United Nations. (2025). “A sustainable future requires new thinking: UN environment report”. Accessed 5 March 2026. <https://news.un.org/en/story/2025/12/1166553>

¹³ United Nations. (2025). “A sustainable future requires new thinking: UN environment report”. Accessed 5 March 2026. <https://news.un.org/en/story/2025/12/1166553>

¹⁴ Danish Ministry of Climate, Energy and Utilities. Accessed 5 March 2026. <https://stateofgreen.com/en/solution-providers/danish-ministry-of-energy-utilities-and-climate/>

¹⁵ Environment and Climate Change Canada. Accessed 5 March 2026. <https://www.canada.ca/en/environment-climate-change.html>

¹⁶ Ministry of Climate and Enterprise. Accessed 5 March 2026. <https://www.government.se/government-of-sweden/ministry-of-climate-and-enterprise/>

5. Undermining New Zealand's democratic system

Democracy can be facilitated through effective governmental systems of that provide MP's and ministers with evidence-based recommendations and policies that put the interest of the public first.

Section 11 of the Public Service Act 2020, subtitled 'Purpose, public service principles, and spirit of service to the community', ministerial bodies are put in place to

“support[s] the Government to pursue the long-term public interest, facilitates active citizenship, and acts in accordance with the law.”¹⁷

SAFE wholeheartedly opposes the proposed Amendment Bill on the basis of its undermining democracy by putting commodity practices before environmental protections that benefit all New Zealander's.

It is the Government's duty of care obligation without conflict and to ensure transparency in environmental reporting.

Research conducted in 2022 by the Ministry for the Environment showed that:

- 50% of New Zealanders are concerned very or extremely worried about the impacts of waste on the environment.¹⁸
- Around 1 in 3 New Zealander's are worried about climate change.¹⁹
- 82% felt it is very or extremely important to improve the water quality in New Zealand.²⁰

The same report also showed that New Zealander's felt the responsibility to improve the quality of water was up to the government, businesses and farmers, whilst one in three thought the government was not doing enough to reduce waste (plastic, landfill, water waste, etc.).²¹

It is clear that there is significant interest in how to improve the quality of life on the planet. By combining the Ministry for the Environment with the Ministry of Housing and Urban Development, the Ministry of Transport, and the local government functions of the Department of Internal Affairs, the functions of the current environmental ministry would be compromised to make way for the competing priorities of the other three ministries. It is wholly unfeasible to rely on a 'super' or 'joint' ministry with reduced environmental oversight to provide protection and support for New Zealand's unique current natural environment.

Lack of evidence

Under the 'Departmental Disclosure Statement' for the Amendment Bill, the Ministry for the Environment has confirms there is none of the following evidence-based reports that have been given to support or inform the Bill²²:

- Public enquiries, reviews or reports.

¹⁷ New Zealand Legislation. Public Service Act 2020. Accessed 5 March 2026.

https://www.legislation.govt.nz/act/public/2020/0040/latest/LMS223343.html?search=ts_act%40bill%40regulation%40deemedreg_public+service+act_resel_25_a&p=1

¹⁸ Ministry for the Environment. (2022). "Understanding New Zealander's attitudes to the environment". Accessed 5 March 2026. <https://environment.govt.nz/facts-and-science/science-and-data/understanding-new-zealanders-attitudes-to-the-environment/>

¹⁹ Ibid.

²⁰ Ibid.

²¹ Ibid.

²² Ministry for the Environment. (2026). "Departmental Disclosure statement". Accessed 5 March 2026. <https://disclosure.legislation.govt.nz/assets/disclosures/bill-government-2026-249.pdf>

- Regulatory Impact statements.
- Impact Analysis.
- Analysis of cost and benefits, or financial implications including loss of income.
- External consultation.

The statement also notes that the financial implication of the merging branches has been withheld.

The National-led Coalition Government has not provided any relevant evidence to support why this proposed Amendment Bill should be pushed through at an 'urgent' pace. The Minister of Commerce and Consumer Affairs, Scott Simpson, stated at the proposed Amendment Bills first reading that the this Bill would need to pass and receive Royal Assent prior to 30 June 2026 to enable for the transfer the functions of the Ministry for the Environment to MCERT on 1 July 2026.²³

It is deeply concerning that timelines and rapid movement is prioritised above holistic evidential reporting which can significantly impact a well-informed decision on the outcome of the proposed Amendment Bill.

Abuse of the urgency process

SAFE highlights the serious concerns associated with the extremely short public consultation phase for this proposed Amendment Bill. The extremely short consultation period seems designed to prevent member of the public and key stakeholders the opportunity to meaningfully engage in this process.

Introducing a proposed Amendment Bill which seeks to drastically reshape the ministerial landscape without robust corroborating evidence or supporting documentation undermines the foundations of our democracy.

Since the coalition parties formed a Government in November 2023, there has been a trend of passing legislation through at a quick rate that has been under-informed and degrading to environmental laws such as the Crown Minerals Amendment Act 2025 that allows offshore petroleum exploration²⁴, suspending the requirements for councils to comply with the Significant Natural Areas provisions that protects native wildlife and plants²⁵, and urgently repealed the Clean Car Discount that encouraged low carbon emission cars.²⁶ The merging of the Ministry for the Environment is no exception to this, reducing the environments importance to a commodity value for land and property development.

Although the proposed Amendment Bill is not officially being passed under urgency, it is troubling that the current Coalition Government has passed more legislation under parliamentary urgency in their first 100 days in office than any other MMP government²⁷, and had passed almost 20

²³ New Zealand Parliament. (2026). "Thursday, 19 February 2026". *Hansard*. Accessed 5 March 2026. <https://hansard.parliament.nz/hansard-transcript/2026-02-19/bills-english-language-bill?slid=4810426869b34a919fe66f993c0c6a51>

²⁴ Ministry for Business, Innovation and Employment. (2025). "Crown Minerals Amendment Act 2025". <https://www.mbie.govt.nz/building-and-energy/energy-and-natural-resources/minerals-and-petroleum/consultations-and-reviews/crown-minerals-amendment-act-2025>

²⁵ Beehive. (2024). "Significant Natural Areas requirement to be suspended".

<https://www.beehive.govt.nz/release/significant-natural-areas-requirement-be-suspended>

²⁶ Beehive. (2023). "Bill to repeal 'Ute Tax' passed". <https://www.beehive.govt.nz/release/bill-repeal-%E2%80%98ute-tax%E2%80%99-passed>

²⁷ McGregor, C. (2025). "Can parliamentary urgency and public accountability peacefully coexist?". *The Spinoff*. Accessed 5 March 2026. <https://thespinoff.co.nz/the-bulletin/27-05-2025/can-parliamentary-urgency-and-public-accountability-peacefully-coexist>

legislations under urgency in the first 400 days than the previous labour government did combined in its two-year term during a global pandemic.²⁸

The ability to put forth policies under urgency was only meant to be utilised in emergency situations and national crises, giving political leaders the ability to change or implement new legislation when unexpected changes rocked the country.

The Coalition Government has continuously abused this power pathway for legislation changes that are predominantly undesirable to New Zealanders, with the proposed Amendment Bill having the potential to undermine their values and opinions. Transferring the functions of the Ministry for the Environment to MCERT and removing three of New Zealand's core executive branches as individual entities in less than six months is not a far stretch from the urgent review of previous Bills.

Prior legislative issues; animal welfare

SAFE presents the following examples of concerns in the animal welfare sector order to show the devastating consequences of the current coalition governments persistence passing legislation that is ill-informed and conflicting with public interest.

Example: Legislative Changes to the Use of Crates for Pigs

On 13 November 2020, the High Court ruled in favour of SAFE's and the New Zealand Animal Law Association's legal action against the Attorney-General, Minister for Agriculture, and the National Animal Welfare Advisory Committee over the use of farrowing crates and mating stalls. The use of these caged systems were seen as unlawful, and had been agreed by the Government at the time to be phased out by the end of 2025.

Despite this, the Minister for Animal Welfare Andrew Hoggard announced that farrowing crates and mating stalls would both still be used indefinitely under Animal Welfare (Regulations for Management of Pigs) Amendment Bill. During the select committee process nearly 90% of public submissions opposed the bill²⁹, yet the bill was approved and enacted. Prior, closer to the first reading of the bill, on 3 April 2025 the National Animal Welfare Advisory Committee raised concerns with the Bill. They found the confinement to stalls unsatisfactory in providing pigs with their natural behaviours such as nesting, and emphasised that the economic considerations should be for transparently identified as the rationale for continuing the use of crates.³⁰

This case is a prime example of putting economic and industry interest above improved living conditions for animals. The government willingness to sacrifice living sentient mother pigs to reduce costs despite public disapproval, shows how dangerous it can be to put through policy without significant evidence and consideration.

It is the role of the Select Committee to recommend a rejection of policies and legislative changes that can significantly reduce the quality of living for people, animals and cause significant damage to the environment. SAFE believes it is imperative that the Select Committee recommends this for the proposed Amendment Bill, as the welfare of entities who don't have a

²⁸ Daalder, M. (2025). "Govt smashes record for laws passed without select committee scrutiny". Newsroom. Accessed 5 March 2026. <https://newsroom.co.nz/2025/01/28/govt-smashes-record-for-laws-passed-without-select-committee-scrutiny/>

²⁹ Primary Production Committee. (2025). Animal Welfare (Regulations for Management of Pigs) Amendment Bill". Accessed 5 March 2026. <https://selectcommittees.parliament.nz/v/SelectCommitteeReport/6dfc57ac-600e-4dff-14a6-08de25706960?lang=en>

³⁰ National Animal Welfare Advisory Committee. (2025). https://www.nawac.org.nz/assets/content-blocks/downloads/3-April-2025-NAWAC_advice-to-Minister-Redacted.pdf

voice (animal and the environment) cannot be continuously downgraded to an accessory for economic and industrial growth projects. New Zealand land and water deserve the same consideration and respect we pay to infrastructure and GDP growth, not a reduction of importance.

6. Negative impacts to natural ecosystems

Reduction of green spaces

Green spaces and biodiversity in plant life are essential for healthy, thriving environments for humans, animals and insects.³¹ New Zealand has already seen a significant decline in green spaces in urban cities. Greater Wellington has 65% green space, Auckland has 55% green space (although this is thought to be lower as Auckland's data is a decade old), and Hamilton only has 45%.³² Over half the amount of these green spaces in each cities is accounted for by backyards (usually of grass alone); however, there is a fast-growing trend that these private green spaces (such as gardens) are declining.³³ Parks and reserves are not increasing as residential areas grow in major urban areas.³⁴

The significant reduction of greenspaces due to urban development is incredibly concerning. Native birds such as Tūi often frequent and make home in parks with suitable trees and shrubbery. Garden areas often provide low diversity rates for insects, and low shade and shelter areas for animals looking to nest; public green spaces are necessary for wildlife to flourish and contribute to the ecosystem.³⁵

A continued loss of green spaces if these green spaces are not protected by and environmental ministry could be devastating for New Zealand. Vegetation in green spaces are essential for filtering rainwater and rejuvenating carbon dioxide emissions into oxygen, and provide sheltered areas to cool the earth.³⁶ Strategically placed green spaces also act as a natural buffer for climate crisis control, observing immense water levels during flooding seasons.³⁷ Conversely, infrastructure development in urban areas can damage these natural buffer zones.³⁸ Large green spaces in closer proximity to one another have also been found to increase fauna diversity³⁹, meaning it is key to maintain green spaces across urban cities and towns for a prosperous ecosystem instead of prioritising intensified housing.

³¹ Lopez, F. (2024). "Evaluating the Ecological Effects of Urban Green Spaces on Local Wildlife Populations". *Journal of Biology and Today's World* 2024, 13(6). <https://www.iomcworld.org/articles/evaluating-the-ecological-effects-of-urban-green-spaces-on-local-wildlife-populations.pdf>

³² Welch, T. (2023). "New report finds we're building harder, hotter cities". *The University of Auckland*. Accessed 5 March 2026. <https://www.auckland.ac.nz/en/news/2023/03/17/report-finds-were-building-harder-hotter-cities.html>

³³ Ibid.

³⁴ Ibid.

³⁵ Ibid.

³⁶ Project EverGreen. "Wildlife and Green Spaces: The Positive Impact". Accessed 5 March 2026. <https://projectevergreen.org/wildlife-green-spaces/>

³⁷ Ibid.

³⁸ Stats NZ. (2025). "Environment report shows human activities are driving changes affecting health, livelihoods and homes". Accessed 5 March 2026. <https://www.stats.govt.nz/news/environment-report-shows-human-activities-are-driving-changes-affecting-health-livelihoods-and-homes/>

³⁹ Hwang, Y., Tan, C.L., Lu, Y. (2025). "Impact of urban green spaces and maintenance regimes on flora and fauna diversity". *Urban Forestry & Urban Greening*, 104. <https://doi.org/10.1016/j.ufug.2025.128678>

This reduction of land with soil suitable for crop growth can also impact the economy as the increase in urban development and land fragmentation is reducing the amount of land available for fruit and vegetable growth.⁴⁰

Environmental degradation contributing to extinction

Currently in New Zealand 7,500 species of plants and animals are at risk of extinction.⁴¹ Data published in 2023 by Stats NZ indicates that 75% of New Zealand indigenous pieces of reptiles, birds, bats, freshwater fish are threatened with extinction or at risk of becoming threatened.⁴² The total percentage of threatened with extinction or risk of becoming threatened are as followed per species⁴³

- 84% of reptiles.
- 82% of birds.
- 80% of bats.
- 76% of freshwater fish.
- 75% of frogs.
- 46% of vascular plants.
- 22% of marine mammals.
- 19% of hornworts and liverworts.
- 14% of lichens.
- 9% of sharks, rays and chimaeras.

For reptiles, bats, freshwater fish and frogs

One of the key reasons so many of animals are under threat is due to the development of drylands which destroys natural living habitats for wildlife.⁴⁴ The immediate impacts of this destruction can be directly attributed to development of real estate, roads, railways, harbours, and powerlines.⁴⁵ One scientific report predicts that by 2050 habitat loss from urban expansion will effect between 26 to 39% of the land-dwelling vertebrates studied.⁴⁶ This destruction to vertebrates and other wildlife can cause immediate displacement to unsuitable areas, a loss of natural behaviours, or a significant diminishing of necessary resources such as food and water.⁴⁷

Biodiversity loss reduces pollination of vegetation crops used for food and traditional medicines⁴⁸, and of wild plants that create clearer air quality and water.⁴⁹ It further interrupts the

⁴⁰ Stats NZ. (2025). "Environment report shows human activities are driving changes affecting health, livelihoods and homes".

⁴¹ Endangered Species Foundation. "Top 10 Endangered Species". Accessed 5 March 2026. <https://www.endangeredspecies.org.nz/top-10-endangered-species>

⁴² Stats NZ. (2023). "Extinction threat to indigenous species". Accessed 5 March 2026. <https://www.stats.govt.nz/indicators/extinction-threat-to-indigenous-species/>

⁴³ Ibid.

⁴⁴ RNZ. (2023). "'A really damning report' – Latest data shows dozens of Aotearoa species at risk". Accessed 5 March 2026. <https://www.rnz.co.nz/news/national/487040/a-really-damning-report-latest-data-shows-dozens-of-aotearoa-species-at-risk>

⁴⁵ Biodiversity & Infrastructure. (2023). "1.3.1 Direct loss of habitat". Accessed 5 March 2026. <https://www.biodiversityinfrastructure.org/handbook/1-infrastructure-effects/1-3-primary-effects/1-3-1-direct-loss-of-habitat/>

⁴⁶ Simkin, R. Seto, K., McDonald, R., Jetz, W. (2022). "Biodiversity impacts and conservation implications of urban land expansion projected to 2050". *PNAS*, 119(12). <https://doi.org/10.1073/pnas.2117297119>

⁴⁷ Harper, E. (2025). "Exploring the Effects of Urbanization on Local Wildlife". Accessed 5 March 2026. <https://cee.org.uk/exploring-the-effects-of-urbanization-on-local-wildlife/>

⁴⁸ Rafferty, J. (2026). "Biodiversity Loss". *Britannica*. <https://www.britannica.com/science/biodiversity-loss>

⁴⁹ Li, J. (2024). "What Are The Consequences of Biodiversity Loss?". Accessed 5 March 2026. <https://earth.org/what-are-the-consequence-of-biodiversity-loss/>

natural food chain cycle having a run-off affect that threatens more species⁵⁰, and can increase the risk of disease spread.⁵¹

With so many of New Zealand's wildlife species already at risk it is inconsiderate to animals and vertebrate to combine the Ministry for the Environment with additional ministries whose work has been proven to cause severe and lasting harm. Biodiversity and ecosystems governed by wildlife are at the core of the Earth's natural structures, the more this degrades the harder it will be to reestablish them in the future.⁵²

The consequences of disestablishing the Ministry for the Environment could wreak havoc on wildlife ecosystems. This is not a choice that should be tested now and fixed later, it is our duty to protect these animals and their ecosystems now before they potentially disappear entirely.

Aotearoa's 'clean green' reputation

Internationally, New Zealand is known for its picturesque landscapes, bustling native wildlife and tidy Kiwi mindset. The term 'clean and green' New Zealand has been identified in scientific literature as referring to a land that has not suffered from significant industrial pollution, over-population, noise, urban decay or traffic congestion.⁵³

The disestablishment of the Ministry for the Environment takes away a key aspect of Kiwi identity by removing the executive branch that ensures our international reputation of an environmentally focussed nation stays intact. Even with effective housing and transportation plans, traffic and industrial pollution are still an inevitable component of expansions. It is ironic that the Government's proposed Amendment Bill seeks to incorporate the Ministry for the Environment into a branch of government whose work effectively contradicts the meaning of 'clean and green'.

Tourism statistics from the Ministry of Business, Innovation and Employment Quarter 4 2025 showed that the main factor in deciding to visit New Zealand (at over 50% for all tourists) was for the landscapes and scenery.⁵⁴ The same statistics also detailed some of the outdoor activities participated in by tourists were hiking, stargazing, jet skiing, swimming, rafting, and mountain climbing⁵⁵; all of which need safe and healthy environmental structures to function. It is necessary that New Zealand's natural landforms and waterways are protected and are sustainable circular ecosystems in order to ensure New Zealand's tourism industry continues to thrive.

It is deeply concerning that the MCERT is seen as a solution whilst it seeks to put the environmental ministries functions alongside ministries whose work can directly contradict environmental protection. The Coalition Government's rationale for combining these ministries is that it will lift standards of living for New Zealander's and better⁵⁶ integrate environmental considerations into planning and transport decisions. SAFE considers this reasoning

⁵⁰ Rafferty, J. (2026). "Biodiversity Loss".

⁵¹ Li, J. (2024). "What Are The Consequences of Biodiversity Loss?".

⁵² Ibid.

⁵³ Bührs, T., & Bartlett, R. V. (1993). "Environmental policy in New Zealand: The politics of clean & green?" *Auckland, New Zealand: Oxford University Press*.

⁵⁴ Ministry of Business, Innovation and Employment. (2026). "International Visitor Survey (Quarterly)". <https://teic.mbie.govt.nz/teiccategories/datareleases/ivs/>

⁵⁵ Ibid.

⁵⁶ Waatea News. (2026). "#environment: Environment (Disestablishment of Ministry for the Environment) Amendment Bill?". Accessed 5 March 2026. <https://waateanews.com/2026/02/21/environment-environment-disestablishment-of-ministry-for-the-environment-amendment-bill/>

objectionable, as although environmental considerations are vital, this proposal once again treats them as secondary to infrastructure development.

A flourishing environment in New Zealand is essential to ensuring that wildlife, plant biodiversity, and communities can thrive in healthy conditions. By disestablishing the Ministry for the Environment, the Government would remove the capacity to uphold our international reputation as an environmentally friendly nation.

7. Conclusion

The proposed Environment (Disestablishment of Ministry for the Environment) Amendment Bill is more than a technicality that needs to be altered, it is a symbolic shift away from environmentally focussed policy.

The MCERT would not be in a position to provide the same functions as Ministry for the Environment for one clear reason, it is not individually focussed on the environment. The probability of conflicts of interest, slower processes, and a severe reduction of environmental of importance is too high of a risk with so little evidence to back up a massive shift in New Zealand's Government.

New Zealand would be the first country to combine Ministry for the Environment with housing, transport and internal affairs ministries and departments. This shift is out of line with what is global trends to combat climate change impacts, environmental crises and natural resource depletion.

Whilst other nations are strengthening their executive branches to provide more resources for environmental protection, the Select Committee and Parliament must look at why the Coalition Government is suggesting New Zealand move backwards.

SAFE urges the Select Committee to prioritise the environment, to choose a system that can safeguard and protect the natural world we live in and interact with every day, not only for the people of today but for all the generations of humans, animals, invertebrate and plants alike that will come in the future.