



## **Nelson Tasman Climate Forum**

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

**Prepared by NTCF Submissions Group**

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## Introduction

1. The [Nelson Tasman Climate Forum](#) (NTCF) thanks the Environment Select Committee for the opportunity to make a submission on the Environment (Disestablishment of Ministry for the Environment) Amendment Bill (the Bill).
2. NTCF is a community-led climate action initiative. We aim to weave the community together around urgent, strategic action to achieve the following goals:
  - rapidly reduce the region's greenhouse gas emissions, increase carbon sequestration and undertake other climate stabilising initiatives, consistent with the urgency of the situation
  - adapt to the likely adverse environmental effects of climate change and the resulting social and cultural effects, using inclusive and responsible decision-making to support these desirable outcomes
  - respond to climate change in a way that recognises the rights of all living organisms, including people, and provides for a just, equitable, and resilient society.
3. We acknowledge the kaitiaki status of local iwi as Manawhenua, tangata whenua of this rohe.
4. *Please note* that whilst the Nelson City Council and Tasman District Council have both signed the Nelson Tasman Climate Forum Charter, this submission has been prepared completely independently of the Councils. This submission is in no way intended and nor should be construed to represent the views of either Council in any way.

## Summary

5. Global heating has accelerated significantly in the past decade. There is growing evidence that the IPCC's models have underestimated the Earth's climate sensitivity, that the real climate response to emissions is towards the high end of previously accepted ranges. Higher sensitivity means more warming for any given level of emissions, and faster approach to dangerous temperature thresholds. Global temperature rise of 2°C is now expected by about 2040, unless urgent action is taken to radically change course.
6. As part of wide-reaching reforms of public sector environmental management, MfE was established under the Environment Act 1986 to oversee major environmental issues and land-use planning. Climate change is now a core MfE function.
7. There needs to be a strong, focused source of policy advice and action within the machinery of Government to be a voice for the systemic changes that are imperative in dealing with the climate change challenge that Aotearoa New Zealand and humanity now

face. We are highly concerned that such a voice could be greatly reduced inside the proposed new, growth oriented, mega-ministry.

8. Effective implementation of Te Tiriti o Waitangi principles in climate and other environmental policy requires a central, accountable institution. A merger without statutory guarantees risks inconsistent engagement and weaker partnership outcomes with Māori.
9. The Bill has specific risks of **diluted functions, conflicting functions, reduced public transparency, and defunding**.
10. Critical work, such as solving New Zealand's waste, recycling, plastic and chemical pollution problems (and their associated emissions), could be left without funding and focus. Only a dedicated agency will attract the best expertise and have the strategic agility to support government in the event of environmental crises such as from toxic chemicals.
11. For all these reasons, NTCF opposes the disestablishment of the Ministry for the Environment (MfE) and its incorporation into the proposed new Ministry.

## Climate change and its consequences

12. 2023, 2024 and 2025 were the three hottest years on record, 1.45°C, 1.55°C and 1.44°C above pre-industrial levels.<sup>1</sup> These increases are higher than previously predicted. Analysis of these recent warming trends, together with a sharp, sustained upward trend of Earth's energy imbalance, evidence that ocean and land-based natural carbon sinks are degrading, and evidence from paleoclimate records all indicate the IPCC's models have underestimated the Earth's climate sensitivity.<sup>2</sup>
13. These findings all point in the same direction: to the risk that the real climate response to emissions is towards the high end of previously accepted ranges and to a faster approach to dangerous temperature thresholds. Net zero carbon budgets will not be even close to limiting the temperature rise to 1.5°C.
14. A recently published paper confirms that global warming has accelerated significantly in the past decade, to about 0.35°C per decade.<sup>3</sup> Global mean temperature rise of 1.5°C is now expected by 2026-2028, breaching the Paris Agreement, and 2°C by about 2040— unless urgent action is taken to radically change course.

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<sup>1</sup> WMO 2026. [WMO confirms 2025 was one of warmest years on record](#).

<sup>2</sup> Trust, S. et al. 2026. [Parasol lost: recovery plan needed. Global risk management for human prosperity](#); Hansen, J.E. et al. 2025. [Global warming has accelerated: are the United Nations and the public well-informed?](#)

<sup>3</sup> Rahmstorf, S. & G. Foster 2026. [Global warming has accelerated significantly](#).

15. It is not widely understood that most economic assessments of climate change exclude many of its real-world impacts, such as tipping points, extreme events, migration, sea level rise, human health impacts, geopolitical risk, and derailment risk. They calculate ongoing economic growth, even in a hothouse world, with climate damage being lower than growth assumptions. These results conflict with scientific predictions of significantly reduced human habitability from climate change.<sup>4</sup>
16. This all poses a high level of under-appreciated risk for Aotearoa New Zealand's economy, environment, and society, alongside those for the wider humanity. Analysis by the UK Institute and Faculty of Actuaries and University of Exeter<sup>5</sup> shows the potential for GDP damages to increase significantly as temperatures increase, leading to a 50% drop in GDP later in the century.
- ② One widely quoted study – that did not take account of tipping points and the like – found that annual global economic damages from climate change in the middle of this century are about five times higher than the abatement and adaptation costs associated with limiting global warming to 2°C.<sup>6</sup> In other words, the economic case for addressing climate change is overwhelming, even without considering its full scope and impacts.

## The Environment (Disestablishment of Ministry for the Environment) Amendment Bill

17. The Bill proposes to disestablish the Ministry for the Environment and to incorporate it, the Ministry of Housing and Urban Development, the Ministry of Transport, and the local government functions of the Department of Internal Affairs into a new ministry (Ministry for Cities, Environment, Regions and Transport, MCERT).
18. The Bill modifies the role of the Secretary for the Environment:
- The Secretary for the Environment will be defined as the chief executive of the Ministry.
  - Existing functions of the Ministry in Section 31, and the requirement for the Ministry and its staff to have regard to the matters in Section 17, are transferred to the Secretary.
  - The Secretary must have regard to the matters listed in Section 17 of the Environment Act when exercising their functions under the other listed Acts which confer functions on them.

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<sup>4</sup> Trust, S. et al. 2026. [Parasol lost: recovery plan needed. Global risk management for human prosperity](#);

<sup>5</sup> Ibid.

<sup>6</sup> Kotz, M., A. Levermann & L. Wenz 2024. [The economic commitment of climate change](#). NB. At time of writing, retracted for correction, scope described at [Major study on catastrophic cost of climate change retracted - but revised figures remain alarming](#). Figure quoted here is based on expected correction.

- The Secretary will be responsible to the Minister for the performance of the Secretary's functions in Section 31 and for complying with their obligation to have regard to the matters set out in Section 17.

## Our concerns

19. Notwithstanding the Bill is said not to materially impact the Ministry for the Environment's existing functions, we have serious concerns about it.
20. MfE was established under the Environment Act 1986 to oversee major environmental issues and land-use planning. Climate change is now a core MfE function. Areas it covers include:
  - climate policy leadership
  - Paris Agreement/Nationally Determined Contribution/other international obligations
  - emissions reduction plans
  - policy development for the Emissions Trading Scheme
  - maintaining the Greenhouse Gas Inventory
  - servicing the Climate Change Chief Executives Board
  - environmental legislation oversight (RMA/Planning Bill and Natural Environment Bill, Waste Minimisation Act)
  - climate and environmental reporting under the Environmental Reporting Act 2015
  - climate adaptation planning (National Adaptation framework and its development)
  - monitoring agency for the Environmental Protection Authority and the Climate Change Commission.
21. By our reading of the Estimates 2025/26, MfE's budget comprises \$529 million for its responsibilities to the Minister of the Environment, \$269 million for its direct responsibilities to the Minister of Climate Change, and a further \$2315 million for industrial NZ ETS emissions allocations. Excluding the industrial allocations (which are a straight financial transfer), Environment and Climate responsibilities would comprise just over 4% and 2% respectively of the new Ministry's financial appropriations.
22. We are greatly concerned that these two small responsibilities will not be given the priority and urgency in departmental work and consideration by the Chief Executive (notwithstanding designation as Secretary for the Environment) that they warrant for the future of Aotearoa New Zealand and humanity, as discussed above. The position of Secretary for the Environment is already a demanding, full-time job, requiring the discharge of functions under many pieces of legislation. This is the **risk of diluted functions**.

23. Subsuming MfE's role into the new Ministry also brings with it the **risk of conflicting functions**, weighing up long-term system imperatives against shorter term priorities driven in part by short-term electoral cycles. There needs to be **public transparency and ownership** in these deliberations, which is made the more difficult when they are behind closed departmental doors. Without a dedicated point of contact, public participation will likely decline.
24. The **risk of diluted functions** would be exacerbated by Clause 12, which extends the ambit of Section 32 of the Act to all of the Secretary's functions (i.e. as chief executive of the new mega-Ministry). Employees will lose their legal mandate and obligation to champion the environment, and that will inevitably diminish their work. Critical work, such as solving New Zealand's waste, recycling, plastic and chemical pollution problems (and their associated emissions), could be left without funding and focus. Only a dedicated agency will attract the best expertise and have the strategic agility to support government in the event of environmental crises such as from toxic chemicals.
25. There is also a risk of defunding environment and climate change due to less public transparency of parliamentary appropriations, unless there is a requirement for dedicated funding.

## Conclusions and Recommendation

26. Global heating has accelerated significantly in the past decade. There is growing evidence that the IPCC's models have underestimated the Earth's climate sensitivity, that the real climate response to emissions is towards the high end of previously accepted ranges.
27. The economic imperative for addressing climate change is overwhelming, as also its social and environmental impacts. Addressing climate change also has many co-benefits.
28. There needs to be a strong, focused source of policy advice and action within the machinery of Government to be a voice for the systemic changes that are imperative in dealing with the climate change challenge that Aotearoa New Zealand and humanity now face. We are highly concerned that such a voice could be greatly reduced inside the proposed new, growth oriented, mega-ministry.
29. NTCF opposes the disestablishment of the Ministry for the Environment (MfE) and its incorporation into the proposed new Ministry. **We recommend** that the Committee recommend the Bill not proceed.

30. We endorse the Environmental Defence Society submission on the Bill, including the four drafting concerns therein.
31. We thank you for your consideration of our contribution.