

19 August 2026

Submission to the Committee Secretariat of the Environment Committee on the ***Environmental Reporting Amendment Bill***.

The Justice & Peace Commission of the Catholic Diocese of Auckland welcomes this opportunity to submit on the *Environmental Reporting Amendment Bill*.

Preface

We have consistently affirmed that environmental protection is both an ecological and moral imperative. In previous submissions on environmental governance, climate change, freshwater management, biodiversity protection, and resource management reform, the Commission has emphasised that the natural environment is a taonga and responsibility entrusted to our collective care.¹

We believe public policy should constantly support the flourishing of creation, uphold Te Tiriti o Waitangi, protect vulnerable communities, and safeguard the conservation of our natural whenua for future generations.

¹ List of current submissions by the Justice & Peace Commission on the Environment

1. **Fast Track Approvals Bill 2024**
<https://www.aucklandcatholic.org.nz/wp-content/uploads/2024/07/Submission-Fast-track-Approvals-Bill-2024.pdf>
2. **Climate Change Response Emissions Trading Scheme Agricultural Obligations Amendment Bill 2024**
<https://www.aucklandcatholic.org.nz/wp-content/uploads/2024/07/Climate-Change-Response-Emissions-Trading-Scheme-Agricultural-Obligations-Amendment-Bill.-JPCA-Submission.pdf>
3. **Marine and Coastal Area (Takutai Moana) (Customary Marine Title) Act Amendment Bill 2024**
<https://www.aucklandcatholic.org.nz/wp-content/uploads/2024/10/Marine-and-Coastal-Area-Takutai-Moana-Act-Amendment-Bill-Submission.pdf>
4. **Regulatory Standards Bill 2025**
<https://www.aucklandcatholic.org.nz/wp-content/uploads/2025/01/Submission-Regulatory-Standards-Bill-JPCA.pdf>
5. **Regulatory Standards Bill (Second Call) 2025**
<https://www.aucklandcatholic.org.nz/wp-content/uploads/2025/06/Regulatory-Standards-Bill-June-2025.pdf>
6. **Fisheries Amendment Bill 2026**
<https://www.aucklandcatholic.org.nz/wp-content/uploads/2026/05/Fisheries-Amendment-Bill-2026-Justice-Peace-Commission-Catholic-Diocese-of-Auckland.pdf>
7. **Conservation Amendment Bill 2026**
<https://www.aucklandcatholic.org.nz/wp-content/uploads/2026/07/Conservation-Amendment-Bill-2026-Justice-and-Peace-Commission-Auckland.pdf>

The Commission has progressively argued that good environmental stewardship depends upon transparent decision-making, robust scientific evidence, meaningful participation by affected communities, and genuine partnership with Tangata Whenua Māori. Environmental reporting is therefore not merely a technical exercise. It is a vital public accountability mechanism that enables us as Tangata Whenua and Tangata Tiriti to understand the state of the environment and their shared responsibilities towards it.

Introduction

As with all our submissions, we view the Environmental Reporting Amendment Bill through the lens of Catholic Social Teaching (CST). The effectiveness of environmental reporting should be measured not only by administrative efficiency but also by its contribution to informed democratic participation, environmental justice, ecological sustainability, and intergenerational wellbeing.

Our advocacy is continually guided by the Gospel, Catholic Social Teaching, and a commitment to the dignity of every person, the common good, peace, justice, and care for creation. We also recognise the unique place of Te Tiriti o Waitangi in Aotearoa New Zealand and the responsibilities that originate from Te Tiriti for public policy and environmental governance. We support the objective of maintaining robust, independent, and authoritative reporting on the state of New Zealand's environment. Effective environmental reporting is essential for informed decision-making, public accountability, and responsible stewardship of the natural world. We therefore support the broad intent of the Bill to strengthen environmental reporting and improve environmental data systems.²

At the same time, we believe the legislation should more clearly reflect responsibilities arising from Te Tiriti o Waitangi and should ensure that any changes to reporting frequency do not reduce transparency, accountability, or public participation.

Te Tiriti o Waitangi – Guiding Principles

Te Tiriti o Waitangi provides an important framework for environmental governance in Aotearoa New Zealand. We believe environmental reporting should reflect:

- Partnership between Māori and the Crown
- Active protection of taonga, including whenua, wai, biodiversity
- Incorporating mātauranga Māori and Tohu

² Ministry for the Environment. (2026, July 23). *Environmental reporting amendment Bill*.
<https://environment.govt.nz/acts-and-regulations/acts/environmental-reporting-amendment-bill-2025/>

- Meaningful participation by Māori in environmental monitoring, data collection, analysis, and reporting.³

A consistent thread in our previous submissions affirm that environmental care is both an ecological and a Treaty obligation. The health of whenua, wai, oceans, ecosystems, and biodiversity are inseparable from the wellbeing of communities and from the Crown's responsibilities under Te Tiriti o Waitangi. Environmental governance should support stewardship of creation, active protection of taonga, meaningful Māori participation in decision-making, and the wellbeing of future generations.⁴

Environmental reporting plays a critical role in giving effect to these principles by providing transparent, trusted information about the state of the environment and the effectiveness of our collective stewardship.

Te Tiriti and Māori Participation

The Commission is deeply perturbed by the Bill's lack of genuine commitment to Te Tiriti o Waitangi obligations, and the seemingly deliberate exclusion of Māori participation within the proposed environmental reporting structure. The amendments to Sections 5, 8 and 11 of the Act give a vague description of Te Ao Māori as a world perspective or view. It does not specify how or if environmental reporting will be directed by Tangata Whenua Māori.

The lack of respect and priority given to Te Tiriti o Waitangi and Tangata Whenua Māori is reflected in the Act itself. Māori, as a distinct entity, is referenced only twice, while Te Ao Māori is mentioned three times within the Act. Across both the current and amended Act, this equates to just one brief section on Te Tiriti o Waitangi obligations and two subclause references that are incongruent, ambiguous, and inadequately limited in scope, resulting in a tokenistic recognition of Māori interests within environmental reporting.

We call for the Minister to establish a Māori Environmental Reporting Advisory Group to direct mātauranga Māori,⁵ and Nga Tohu o te Taiao⁶ integration to ensure alignment with

³ Ministry for the Environment. (2023, September 27). *Mātauranga Māori and the ministry*.

<https://environment.govt.nz/te-ao-maori/matauranga-maori-and-the-ministry/>

⁴ See submissions: Conservation Amendment Bill 2026, Marine and Coastal Area Amendment Bill 2024, Fisheries Amendment Bill 2026

⁵ Mika, Jason. (2021). *Māori perspectives on the environment and wellbeing*.

https://www.researchgate.net/publication/357269782_Maori_perspectives_on_the_environment_and_wellbeing

⁶ Earth Sciences New Zealand | NIWA. (2025). *Lesson 9: Ngā tohu o te taiao – māori environmental indicators*. <https://niwa.co.nz/climate-and-weather/rangi-weather-and-climate-lessons-teachers/lesson-9-nga-tohu-o-te-taiao-maori-environmental-indicators>

Te Tiriti o Waitangi that is not only established and operational in the first instance (pono) but also valued and correct (tika). This must incorporate:

- Māori participation in governance and reporting processes
- Incorporation and implementation of mātauranga Māori
- Reporting on the condition of taonga species, ecosystems, and waterways and
- Recognition and implementation of Māori environmental indicators (Tohu).

Applied Catholic Social Teaching (CST)

CST understands creation as a gift entrusted to humanity. Environmental degradation is therefore not solely an ecological concern but also a moral concern because it affects human wellbeing, particularly the wellbeing of those in need and future generations.

Several principles are relevant to this Bill. We draw principles and concepts from our previous submissions:

Care for Creation

Human beings have a responsibility to care for and protect the natural environment. Environmental reporting contributes to this responsibility by providing reliable information about the condition of ecosystems, biodiversity, land, freshwater, oceans, and climate. Care for creation is therefore not a separate concern for human wellbeing but integral to the wellbeing of all life.

The Common Good

The common good and subsidiarity require that all people have access to information necessary to participate in informed decisions affecting their communities and environment. Environmental information is a public good and should be accessible, transparent, and trusted.

Through CST we understand the common good as the social and environmental conditions that enable individuals, families, and communities to flourish. We consistently maintain that the protection of land, water, biodiversity, and the climate is an essential expression of our responsibility to promote the common good, particularly for those who are most vulnerable, and for generations yet to come.

Environmental reporting serves the common good by providing transparent, trustworthy, and accessible information about the condition of the environment. Such information enables informed participation in democratic decision-making, supports

accountability, and assists communities and governments to exercise responsible stewardship of the natural world.⁷

Preferential Option for the Vulnerable

Environmental harm often affects vulnerable communities disproportionately. Effective reporting should therefore enable decision-makers and communities to understand not only environmental change but also its consequences for human wellbeing.

The preferential option reminds us that environmental harm is rarely experienced equally. Communities with the fewest resources are often the most exposed to pollution, environmental degradation, climate change, biodiversity loss, and the declining health of land and water. Decisions about environmental management should pay particular attention to the needs and experiences of those who are least able to protect themselves from environmental risks.

Environmental reporting must therefore make visible the unequal impacts of environmental justice for vulnerable communities. Reports must identify who is most affected, the nature and extent of those impacts, and whether environmental risks, costs, and benefits are distributed fairly across society. Policies must support and promote justice, human dignity, and the wellbeing of all members of society, especially those who are most vulnerable,⁸ and attention must be given to those communities with limited capacity to avoid, adapt to, or recover from environmental harm.⁹

Intergenerational Justice

Future generations have a right to inherit a healthy and flourishing environment. Environmental reporting should support long-term thinking and highlight trends that may affect future generations.

We greatly support the inclusion of environmental outlooks within the environmental reporting framework. With the principle of intergenerational justice, environmental reporting should help us understand our current environmental conditions. Reporting should also provide the necessary evidence required to discern and anticipate potential consequences of present actions (or lack thereof). Therefore, rigorous reporting on long-term trends, climate change, biodiversity loss, freshwater quality, and ecosystem

⁷ See Conservation Amendment 2026, Fisheries 2026, or Fast-Track Approvals 2024 submissions for further references on care of creation and the common good in environmental care and reporting.

⁸ See Climate Change 2024, Fast-track 2024, or Fisheries Amendment 2026 submissions for more on the Preferential Option in environmental care and reporting.

⁹ Greenpeace. (2024). *Environmental Justice*. <https://www.greenpeace.org/usa/environmental-justice/>

resilience will support responsible stewardship, and help ensure that future generations inherit an environment capable of sustaining life, wellbeing, and human flourishing.¹⁰

Supports: Strengthening Environmental Data

We support amendments intended to improve environmental data collection, strengthen data standards, and identify priorities for future monitoring and research. Reliable and high-quality information is essential for developing informed public policy and environmental stewardship.¹¹

Reporting on Drivers and Outlooks

We welcome the proposal to require reporting on environmental drivers and future outlooks. Understanding the causes of environmental pressures, as well as their likely future consequences, can support better policy choices and help the public understand long-term environmental challenges.¹²

Independent Environmental Reporting

Independent environmental reporting provides an important safeguard for democratic accountability. We support the Bill's intention to preserve the availability of independent and authoritative environmental information.

Concerns: Frequency of Reporting and Public Accountability

The Bill proposes reducing the frequency of comprehensive state of environment reporting from every three years to every six years and replacing six-monthly domain reports with annual commentary reporting.

While we acknowledge the Government's objective of producing more meaningful and integrated reporting, we are concerned that less frequent reporting may risk reducing public visibility of environmental trends and weaken accountability.

Environmental change often occurs gradually. Consistent and publicly accessible reporting helps decision-makers and communities understand emerging risks within an appropriate timeframe to respond accordingly.

¹⁰ See Conservation Amendment 2026 submission for more on intergenerational justice and environmental care.

¹¹ StatsNZ, & Ministry for the Environment. (2026, May 14). *NZ legislation disclosures*. Govt.Nz. <https://disclosure.legislation.govt.nz/bill/government/2026/321>

¹² Climate Change Commission: He Pou a Rangi. (2026, May 7). *2026 National climate change risk assessment*. <https://www.climatecommission.govt.nz/reports-and-evidence/publications/2026-national-climate-change-risk-assessment/>

We encourage the Committee to ensure that reduced reporting requirements do not result in diminished transparency or fewer opportunities for public engagement.¹³

Environmental Justice

As stated in our section on the preferential option for those most vulnerable, environmental reporting must help identify who experiences the impacts of environmental degradation.

The Commission encourages expansion of reporting frameworks to consider:

- Distribution of environmental harms and benefits
- Impacts on vulnerable communities
- Community health and wellbeing and
- The relationship between environmental conditions and social outcomes.

An environmental reporting system that considers both ecological and human impacts will better serve the common good and environmental justice.

Intergenerational Responsibility

The proposal to include environmental outlooks is a positive development. However, we believe outlook reporting should explicitly consider impacts on future generations.

Stronger attention should be given to:

- Climate change
- Biodiversity loss
- Freshwater quality
- Ecosystem resilience and
- Long-term environmental risks.

As stated throughout this submission, we believe environmental reporting should support a culture of stewardship that looks beyond immediate interests and considers the wellbeing of generations yet to come.¹⁴

¹³ More on independent, frequent and public environmental reporting, justice and accountability:

1. UNEP [Environmental and Social Sustainability Framework \(ESSF\)](#)
2. Govt.NZ [Ministry for Cities, Environment, Regions & Transport](#)
3. [Australia State of the Environment](#)

¹⁴ Pope Francis. (2015, May 24). *Laudato Si': On Care for our Common Home*. The Holy See. https://www.vatican.va/content/francesco/en/encyclicals/documents/papa-francesco_20150524_enciclica-laudato-si.html Refers to Chapter V. Justice between the generations

Recommendations

We recommend the Committee:

1. Retain strong safeguards for independent and transparent environmental reporting.
2. Ensure that reduced reporting frequency does not diminish public accountability or access to environmental information.
3. Strengthen recognition of Te Tiriti o Waitangi within the reporting framework.
4. Require meaningful Māori participation in environmental reporting processes.
5. Explicitly recognise the contribution of mātauranga Māori and Tohu alongside other forms of knowledge.
6. Include environmental justice considerations and measures of community wellbeing where relevant.
7. Strengthen requirements to consider intergenerational impacts and long-term environmental sustainability.
8. Require environmental reporting to identify and report disproportionate impacts on vulnerable communities.

Conclusion

The Justice & Peace Commission supports the overall objective of improving the effectiveness and quality of environmental reporting in Aotearoa New Zealand. We particularly welcome efforts to strengthen environmental data, improve understanding of environmental drivers, and encourage a longer-term perspective on environmental change.

Concurrently, environmental reporting must continue to promote transparency, accountability, participation, and respect for Te Tiriti o Waitangi. Reporting should assist us as citizens, inhabitants, and people of this whenua to understand the current state of our environment, and encourage the sharing of responsibility, caring for creation, upholding justice, and protecting the environmental wellbeing of our whenua for future generations.

We close with the wisdom of our former Pope Francis on environmental regulation:

A consensus should always be reached between the different stakeholders, who can offer a variety of approaches, solutions and alternatives. The local population should have a special place at the table; they are concerned about their own future and that of their children, and can consider goals transcending

*immediate economic interest. We need to stop thinking in terms of “interventions” to save the environment in favour of policies developed and debated by all interested parties. The participation of the latter also entails being fully informed about such projects and their different risks and possibilities; this includes not just preliminary decisions but also various follow-up activities and continued monitoring. Honesty and truth are needed in scientific and political discussions; these should not be limited to the issue of whether or not a particular project is permitted by law.*¹⁵

The Justice & Peace Commission respectfully submits that the *Environmental Reporting Amendment Bill* would be strengthened by amendments that more clearly reflect the principles and arguments presented in our submission.

¹⁵ *Laudato Si'*, n.183.