



Environment Institute
of Australia and
New Zealand Inc.

POLICY SUBMISSION

Ministry for the Environment

8 Willis St
Wellington, New Zealand

26 July 2025

To Whom It May Concern,

SUBMISSION: Package 1 – Infrastructure and development

This submission sets out the Environment Institute of Australia and New Zealand's (EIANZ) position on the **Package 1 – Infrastructure and development**, released 29 May 2025.

We acknowledge the effort that the Ministry for the Environment have put into seeking consultation on the document.

About EIANZ

Founded in 1987, EIANZ is a professional association of around 4,000 environmental practitioners from across Australia and New Zealand. We provide opportunities for professional and academic dialogue across all sectors of the environmental industry. The Institute membership includes specialists in a range of environmental disciplines: climate change, contaminated land, planning, engineers, law, environmental science, freshwater, marine and coastal sciences, and ecology.

A significant initiative of EIANZ is the Certified Environmental Practitioner (CEnvP) Scheme, which is Australasia's leading accreditation scheme designed exclusively for environmental practitioners and recognises environmental professionals in line with their professional counterparts from engineering, accounting, planning and architecture. Ten members residing in NZ are Fellows or Honorary Life Members of the EIANZ recognising the contributions to environmental practice over several decades. These credentials are significant in the recognition of environmental practice in New Zealand.

Our approach

The feedback expressed in this submission is formed from a consensus approach amongst practitioners within EIANZ. The main thrust of the feedback was developed from a small number of members before seeking comment from the membership at large. Accordingly, it represents a

whole of industry feedback rather than any regional or sector response. More importantly it represents the collective experience of environmental practitioners who work with and implement environmental legislation, regulations, policy as well as business and community aspirations. We emphasise that our submission is based on the clarity, consistency, and practicality of the proposed implementation of the Package 1 – Infrastructure and development. In addition, we draw attention to areas where our experience suggests that greater direction is required within the proposed direction.

Layout of submission

This submission addresses only those National Policy Statements (NPSs) that were discussed by EIANZ members during a targeted workshops on Package 1. It focuses on the NPS for Infrastructure, the NPS for Renewable Electricity Generation, and the NPS for Natural Hazards. Feedback is limited to these areas where members identified professional relevance and had sufficient opportunity to review the material. Each section provides commentary on the proposed policy direction, implementation challenges, and recommendations for improvement.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Connor Whiteley', with a stylized, looped initial 'C' and a long, sweeping horizontal stroke extending to the right.

Connor Whiteley

President, NZ Chapter, EIANZ

Submission – 1 – Infrastructure and development

National Policy Statement for Infrastructure (NPS-I)

The EIANZ supports the development of a National Policy Statement (NPS) for Infrastructure that provides nationally consistent direction for planning, consenting, and managing the environmental effects of infrastructure. However, we have several concerns regarding the current state of the document and the limitations it presents for meaningful technical engagement.

At the time of consultation, the government has released only a draft “policy intent” rather than a full draft NPS. This makes it challenging for practitioners to critically assess how the proposed direction would operate in practice, especially given the central role infrastructure plays in shaping long-term environmental and community outcomes.

Key matters raised by EIANZ members include:

- **Incomplete effects management framework:** The current documentation refers to “avoidance,” “remediation,” and “mitigation” but makes no reference to offsetting or environmental compensation, both of which are commonly applied and expected in infrastructure-related assessments. This omission raises questions about whether the NPS intends to shift away from the standard effects management hierarchy currently embedded in practice and policy. We recommend the inclusion of offsetting and compensation to ensure alignment with existing national direction and best practice.
- **Lack of implementation clarity:** Terms such as “proportionate” and “cost-effective” (notably in Policy 6) are conceptually important but undefined. Without technical guidance or assessment tools, their use may lead to uncertainty and inconsistency in how conditions of consent or mitigation requirements are applied. We recommend supporting guidance be developed to assist planners, applicants, and decision-makers in applying these terms with clarity and consistency.
- **Unresolved policy conflict:** The infrastructure NPS is likely to sit alongside existing NPSs (e.g. NPS-Freshwater Management, NPS-Indigenous Biodiversity), creating situations where infrastructure direction may directly conflict with environmental protection mandates. Members noted a lack of policy hierarchy or reconciliation framework. We recommend the inclusion of explicit guidance to assist decision-makers in navigating trade-offs where policies compete.
- **Opportunities for innovation:** Members identified potential for the NPS to encourage more strategic approaches to managing lower-value environmental effects, such as enabling “trading up” or pooled offsetting mechanisms. This could provide infrastructure providers with flexible pathways to achieve better environmental outcomes, especially in cases where minor residual impacts on degraded or modified ecosystems occur. We recommend the exploration of such tools as part of NPS implementation support.

Overall, while the NPS-I addresses some key themes, it requires more comprehensive drafting and supporting mechanisms to be effective in practice. EIANZ would welcome the opportunity to assist with technical peer review or advisory roles in shaping these components.

National Policy Statement for Renewable Electricity Generation (NPS-REG)

While the NPS-REG received less discussion from participating members, during our workshops, it was identified as an important adjacent policy instrument where alignment with environmental protection goals will be critical. EIANZ supports the sustainable development of renewable electricity generation. The development of renewable energy is a priority for New Zealand, but it must be pursued in a way that maintains biodiversity values, freshwater quality, and other national priorities.

We support the intent of the NPS-REG but note the need for:

- Consistency with the NPS-FM and NPS-IB to avoid inadvertent undermining of ecological or hydrological values;
- Clear guidance on how to manage environmental trade-offs where large-scale infrastructure (e.g. wind farms, solar arrays) overlaps with sensitive habitats or productive land; and
- Consideration of cumulative effects where multiple projects are located within the same catchment or landscape unit.

National Policy Statement for Natural Hazards (NPS-NH)

Members agreed that the NPS-NH is a critical component of the infrastructure planning framework but noted a significant omission in its current scope. In particular, the draft direction appears to focus on recognising natural hazard risks (e.g. flooding, coastal erosion) without adequately addressing hazard mitigation, especially in relation to seismic risk.

Given the importance of long-term resilience in infrastructure investment, the NPS-NH should provide:

- Direction on the integration of seismic and geotechnical risk into infrastructure planning and design;
- Consideration of adaptive pathways planning and climate resilience measures; and
- Clearer connections between natural hazard risk and infrastructure location, design, and investment prioritisation.

Without such provisions, the NPS risks being disconnected from the core functions of infrastructure design and strategic asset planning.

Conclusion

The EIANZ appreciates the opportunity to provide feedback on Package 1 – Infrastructure and Development and acknowledges the government's effort to consult with the profession. The National Policy Statements for Infrastructure, Renewable Electricity Generation, and Natural Hazards are foundational to achieving a more integrated and resilient planning system. However, each would benefit from:

- Greater policy clarity and precision;

- Inclusion of established environmental management tools (such as offsetting and compensation);
- Improved guidance on resolving cross-policy conflicts; and
- Strategic flexibility to enable better long-term outcomes.

We encourage the Ministry for the Environment to continue engaging with environmental professionals and technical experts to refine these instruments. EIANZ would welcome the opportunity to provide further input through technical working groups, peer review, or presentation to Select Committee if that would be of assistance.