

OPEN LETTER

16 September, 2026

Dear Members of Parliament,

Re: Parliamentary Bills Fail to Deliver an Environmental Monitoring Framework

There are currently five Bills progressing through Parliament which, if approved, would mean that members of Parliament are, in effect, approving the abandonment of a National Party election promise.

We ask members of Parliament not to approve these Bills. The gaps described, and many of the clauses, erode officials' decision-making powers. To effectively steward anthropogenic releases, whether synthetic chemicals, genetically modified or gene-edited organisms, or their by-products, we must be able to identify, monitor and understand them. Yet the necessary obligations and resourcing are not built into the legislation.

Public officials at MPI, the NZ EPA and WorkSafe, and elsewhere, require legislation that enables them to protect human and environmental health. This requires learning from harms identified in other jurisdictions, while maintaining monitoring systems capable of detecting emerging risks at an early stage.

We do not consider that these Bills adequately support officials to do this, particularly in the face of sustained industry pressure to deregulate, accelerate approvals and weaken regulatory controls.

Together, they reveal a rushed and incoherent approach that cannot adequately steward and protect freshwater, marine environments, agricultural soils or human health.

It is impossible to protect the 'physical, chemical, or biological condition of land, water or air', or human health, without monitoring before, during and after the release of a substance, whether a potentially toxic chemical or novel organism, and evaluation of discrete or combinatory pollutant risks.

The [National Party promised in 2023](#) that it would implement the [Parliamentary Commissioner for the Environment's eight recommendations \(2022\)](#). The resulting work programme [commenced in 2022](#), but had been [abandoned by 2024](#).

Honouring that promise to the PCE and the New Zealand public would have required legislation, secondary legislation, rules and guidance to ensure that environmental contaminants, whether from industrial, agricultural or urban sources, including wastewater, are monitored, assessed and understood. That commitment should have been integrated into all related proposed legislation including:

- [Natural Environment Bill 234-3 - 3rd Reading](#)
- [Gene Technology Bill 110-2 - 2nd Reading](#)
- [Hazardous Substances & New Organisms Amendment Bill 304-2 - 2nd Reading](#)
- [Agricultural Compounds & Veterinary Medicines Amendment Bill 305-2 - 2nd Reading](#)
- [Environmental Reporting Amendment Bill \(321-1\) - Select Committee stage](#).

As of writing, none of these Bills establishes an integrated system for monitoring anthropogenic contaminants and novel organisms; none requires best-practice assessment of pollutant chemicals and novel organisms; and none establishes a clear precautionary framework for officials where scientific evidence indicates plausible but uncertain risks from toxicity, bioaccumulation or persistence.

Markedly, these Bills appear drafted to 'get the job done', but they cannot adequately prevent pollution of already-declining groundwater aquifers, freshwater and marine environments, protect agricultural soils from degradation, or protect the health of farmers and growers.

KEY PORTFOLIOS: UNDERMINING THE PARLIAMENTARY COMMISSIONER FOR THE ENVIRONMENT?

The Parliamentary Commissioner for the Environment (PCE) Simon Upton has repeatedly raised concerns about the [neglected state of environmental reporting](#) in New Zealand.

PCE Simon Upton's reports and papers across the years: [2019](#), [2020](#), [2021](#), [2022](#) and [2026](#) testify to a sustained effort to improve New Zealand's environmental knowledge and reporting systems.

The failure to establish an integrated system has occurred under both National and Labour governments.

The PCE's work since 2018, proceeded in parallel with a \$221 million freshwater reform programme overseen by successive Labour and National governments. Yet toxic industrial, agrichemical and wastewater contaminants were never systematically incorporated into that programme, for example by requiring degraded waters to undergo suites of chemical analyses to identify contamination, bioaccumulation and associated toxicological risks.

An Official Information Act request revealed that Minister for the Environment Nicola Grigg, currently responsible for the [Hazardous Substances and New Organisms \(HSNO\) Amendment Bill 304-2](#) and the [Environmental Reporting Amendment Bill \(321-1\)](#), **held no information** concerning the PCE recommendation implementation plan. These Ministerial bills show that the Government has again set aside the systematic stewardship of toxic chemicals and novel (including gene edited) organisms within these reforms. This includes possibly heritable pieces of RNA (e.g. dsRNA used in the [varroa control biopesticide Norroa](#)).

Similarly, Chris Bishop's [Natural Environment Bill 234-3](#) and Andrew Hoggard's [Agricultural Compounds and Veterinary Medicines \(ACVM\) Amendment Bill 305-2](#) also fail to establish requirements for monitoring chemicals released into the environment from either point or diffuse sources.

PRECAUTIONARY APPROACH DRAFTED OUT

Unfortunately, these Bills do not expressly embed precaution in a way that would enable officials to apply a precautionary approach, without fear or favour. Government officials must be able to make precautionary decisions not to proceed with, or to prohibit, the release of a hazardous substance or novel organism where 'human activities may lead to morally unacceptable harm that is scientifically plausible but uncertain', and action is therefore warranted to avoid or diminish that harm.

PSGRNZ expressed these concerns in our [February 16 submission](#) to the [Natural Environment Bill 2026](#). The Environment Committee consequently stated '[The majority of us think there is no need to set a precautionary principle in primary legislation](#)'. Its report did not disclose how many submitters supported incorporating precaution into the legislation.

'think'? Where are the legal scholars? MPs are being left to say they '*think*' the precautionary principle is unnecessary, despite its profound importance where potential harm is scientifically plausible but uncertain.

ERODING THE PURPOSE & PRINCIPLES OF THE HSNO ACT?

We understand that the [Gene Technology Bill 110-2](#) remains at the second reading stage. It proposes to deregulate some gene-edited organisms and technologies to such an extent that subsequent environmental releases and the wilding or spread of some organisms may become difficult to identify and monitor.

Subsequently, the [HSNO Bill 304-2](#) (as [our submission](#) discussed), introduced, i.e. invented, a new mechanism for removing new-organism status, described as 'denewing'.

The [HSNO Bill 304-2](#) aims to embed some of the more unpopular elements of the Gene Technology Bill's deregulatory architecture inside the HSNO framework. It is, in effect, a legislative Trojan horse.

We [are concerned](#) that that Bill has been drafted in a manner that may substantially undermine the purpose and principles of the Hazardous Substances and New Organisms Act 1996.

OFFICIALS REQUIRE AN OBLIGATION TO IDENTIFY INTERNATIONAL BEST PRACTICE

Both the [HSNO Bill 304-2](#) and the [ACVM Bill 305-2](#) enable approvals to rely upon decisions of overseas regulators. Yet no obligation is drafted into these texts to require that New Zealand adopt the most recent relevant assessment or best regulatory practice from comparable jurisdictions.

Consequently, New Zealand approvals may proceed without a full domestic risk assessment, and follow a low-bar jurisdiction. Similarly, while the New Zealand Environmental Protection Authority (NZ EPA) may agree with a foreign finding, it can and does, adopt use-patterns and weaker controls than that foreign jurisdiction while claiming that New Zealand is following international standards.

For example, New Zealand permits glyphosate to be sprayed on protected wetlands, yet we are unaware of any formal regulatory risk assessment internationally that has specifically assessed the use-pattern and safety of broadcast glyphosate application directly onto wetland ecosystems. New Zealand sprays hectares of protected wetlands without any risk assessment having demonstrated that this particular use is safe. Similarly, the lack of assessment of a specific use, applies for urban roadside weed spraying.

WORKER RISK IGNORED IN A FASTER APPROVAL OF UNTESTED & NOVEL PESTICIDES

PSGR NZ appreciates that the agrichemical and plant protection industry seeks faster and more efficient approvals. *But faster approval of previously assessed pesticides must not be conflated with faster authorisation of previously unassessed experimental substances.*

The NZ EPA recently approved trials involving 104 undisclosed experimental substances under ([APP205221/APP205201](#)). The trials themselves are intended to generate data on plant safety, efficacy and residues. There is no evidence that these experimental substances ever underwent substantive peer-reviewed human health risk assessment overseas.

Indeed, APP205201 expressly includes novel compounds that have not been assessed by any overseas regulatory authority. We are currently seeking further information about the assessment and oversight of these approvals through Official Information Act requests to the [NZ EPA](#), the [Ministry for Primary Industries \(MPI\)](#) and [WorkSafe](#).

We are concerned that many of these 104 substances were approved for trials despite substantial gaps in publicly available human-health evidence.

Most concerningly, New Zealand workers may handle, apply or otherwise encounter these experimental substances in field, glasshouse and laboratory settings, yet the public documentation identifies no biological exposure indices, validated biomarkers or health-monitoring programme for detecting occupational exposure or emerging adverse effects.

We ask members of Parliament to send these Bills back to the drawing board: to ensure chemical approvals reflect international best practice; that gene-edited technologies and organisms are not deregulated through misleading or scientifically unsound mechanisms; that a precautionary approach is embedded at the highest levels of decision-making; and that New Zealand establishes an integrated monitoring and assessment programme to protect our waters, soils, flora and fauna, and human health for generations to come.

Kind regards| Ngā mihi

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For the Trustees of

The Physicians and Scientists for Global Responsibility New Zealand Charitable Trust.