

NEW ZEALAND ENVIRONMENTAL POLICY IN THE KEY  
ERA: ESCALATING CRISES IN A TIME OF NEO-LIBERAL  
ECONOMIC DOMINANCE

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Since 2008, over three terms of a National Party-led government, the environment went from being an issue that barely registered with the electorate to becoming perhaps *the* dominant issue of the 2017 election. The past nine years witnessed a dramatic escalation of environmental problems across New Zealand, with issues as wide-ranging as water quality, waste management, biodiversity loss and climate change receiving prominent attention in the public arena. Such perceptions of deepening environmental damage in recent years have scarred the 'clean, green and 100% pure' image that New Zealand has assiduously cultivated over the last few decades.

In many ways, public concerns about the state of the environment were not a surprise given the high profile campaigns run by organisations such as Greenpeace in the last several years. Equally importantly, ordinary people were starting to experience the impacts of environmental problems in very direct ways and on an unprecedented scale – be it illness and death from contaminated water as in Havelock North in 2016 (Radio New Zealand 2017a), or flooding from extreme weather events that left thousands homeless across the country (Bilby 2017). Yet, despite the perceptible shift in public opinion on worsening environmental problems (Hughes et al. 2016), the National-led government continued to take a minimalist approach to the multiple issues crowding the horizon. It matched its reluctance to act with a tendency for obfuscation in reporting on environmental indicators (Joy 2015; see also Parliamentary Commissioner for the Environment 2016b, pp. 18, 22), offering up symbolic gestures such as adopting greenhouse gas emissions targets with little policy detail to correspond to the rhetoric (Macey 2014).

The result was a fragmented and poorly performing environmental policy sector, reflecting an overriding ideological commitment to neo-

liberal economic thinking and policy capture by economic elites who were seemingly indifferent to environmental concerns. The current state of the environment, while clearly not the sole responsibility of the previous government, offers compelling evidence of National's failure to recognise that macro-economic indicators of growth are rarely ever adequate indicators or measures for environmental and social well-being. This failure to appropriately address questions of sustainable resource management and resource access remains one of the lasting legacies of the Key government.

We explore in this chapter<sup>1</sup> the performance of the Key government on environmental policy, focusing in particular on two major environmental issues that confront New Zealand – climate change and water quality. We trace the evolution of these issues and examine the relevant policies and their implications for environmental sustainability. We begin with an overview of the institutional context and the ideological commitments that underpin policy-making in New Zealand.

### **Institutional and legislative context**

New Zealand's unitary form of government has historically been marked by a high concentration of power at the centre. There was a period of greater devolution of powers to local and regional government, as seen in the 2002 reforms to the Local Government Act (LGA), but by the mid-2000s this had started to be reversed (Harker et al. 2017). The resulting centralisation of power, especially since 2008, has had profound implications for the ability of local government to respond to environmental and resource management challenges in their region. During the nine years of the National-led government, policy developments systematically stripped the provisions for local governance on environmental, social, economic and cultural well-being from the relevant pieces of legislation, especially the Resource Management Act (RMA) and the LGA.

The RMA, which provides for environmental governance across national, regional and local levels, with considerable scope for public participation through a submissions process, was the target of major reforms under the National-led government. As Harker, Taylor and Knight-Lenihan (2017) narrate, these amendments 'enable nationally significant plan changes and development applications to circumvent local government decision-making processes and limit public stakeholder participation' (p. 491). Other reforms put through by the previous Labour-led government in 2004

removed provisions for regional councils to 'consider the adverse effects of GHG (greenhouse gas) emissions from proposed activities such as thermal power plants, when granting discharge permits' (Harker et al. 2017). Although the stated intention of this reform was to allow for the creation of national environmental standards for GHG emissions as well as other mitigation measures, the National-led government after 2008 abandoned any such effort. Other steps, such as New Zealand's participation in global initiatives delivered under the auspices of ICLEI (Local Governments for Sustainability), including 'Communities for Climate Protection', were also discontinued by the National-led government (Harker et al. 2017). In effect, New Zealand's climate change policy floundered, with a conscious focus on being a 'fast follower' rather than a global leader (*Dominion Post* 2014).

Alongside changes to the RMA, the LGA was amended in 2012 to remove 'sustainable development' from local government's purposes. The LGA's references to promoting 'social, economic, environmental and cultural well-being' were replaced with the following commitment: 'To meet the current and future needs of communities for good quality local infrastructure, local public services, and performance of regulatory functions in a way that is most cost effective for households and businesses' (Local Government Act 2002 Amendment Act 2012).

As a number of submissions to the select committee pointed out, these changes weakened democratic institutions and processes by reducing the autonomy of local government bodies. Certainly, they appeared to reflect little other than an ideological commitment to serving business interests at the expense of a holistic commitment to sustainable communities (Public Service Association 2012; Cheyne 2012). It is noteworthy that the reforms were opposed by all 78 local authorities, with the President of Local Government New Zealand (LGNZ), Lawrence Yule, stating, 'The four well-beings are not putting cost pressures on councils, but the fast rising prices for essential supplies such as bitumen for roading are. The well-beings provide clarity' (LGNZ 2012). From the perspective of environmental policy, these changes to the LGA prevented 'environmental well-being' from being used as the rationale for adopting relevant policies, whether on climate change or a range of other issues.

In addition to such reforms, a significant policy initiative by the government was the passing of the Environmental Reporting Act 2015, which made national environmental reporting mandatory for the first time. The Act replaced the *ad hoc* production of 'state of the environment'

reports by the Ministry for the Environment. Instead, the Government Statistician and the Secretary for the Environment were responsible for producing a ‘domain’ report on one of five environmental topics (air, freshwater, land, marine, and atmosphere and climate) every six months, with a comprehensive synthesis report every three years. The first synthesis report – *Environment Aotearoa 2015* – was generally welcomed by experts despite concerns expressed about the quality of some of the data presented (Science Media Centre 2015).

The National-led government also issued a National Policy Statement (NPS) on freshwater in 2014, which met with widespread criticism. The NPS was described as ‘20 years too late and toothless’ (Joy 2014). Ecologist Russell Death commented, ‘The NPS on freshwater is a long way from any significant protection for our rivers and streams’ (Morton 2018). The proposal to categorise rivers and streams as ‘wadeable’ instead of ‘swimmable’ came in for ridicule from many in the public and the scientific community, while reinforcing a perception that the government was not serious about addressing the issue of water quality. The sharp deterioration in water quality due to intensification of dairy farming became a significant issue in the 2017 election.

On multiple fronts, then, the last nine years saw a dramatic decline in environmental quality. The Department of Conservation (DOC) also faced significant cuts to its budget, forcing it to enter into public-private partnerships that have not always served the conservation agenda. For example, while New Zealand has the ‘highest number of endangered species on Earth’ (*NewsHub* 2018), the environmental organisation Forest & Bird, in 2017, gave the government’s new ‘threatened species strategy’ a ‘four out of ten’, saying it would be insufficient to ‘reverse the crisis affecting New Zealand’s native species’ (Forest & Bird 2017). As Dinica (2015) comments,

While the government has made considerable progress in opening up the conservation estate to businesses . . . there are no concrete statements from government members or DOC officials, and no policy developments or legal initiatives, setting out the latter part of the equation: conservation gains, or wider environmental gains, from more tourism concessions in national parks. (p. 33)

It is, however, the issues of climate change and water quality that became the focus of sustained activism and scientific concern over the last few years.

## Climate change

Perhaps the clearest sign of the National-led government's reluctance to act on environmental issues comes from the state of New Zealand's climate policy. The government's approach to climate change mitigation in the last decade, on both international and domestic fronts, cemented New Zealand's global image as a 'laggard' (Barrett et al. 2015). Part of the difficulty in getting action on climate change mitigation in New Zealand lies in its somewhat unusual emissions profile for a developed country, with nearly 50 per cent of its emissions coming from the agricultural sector, and the remaining amount mainly from energy – primarily industry and transport. Although 85 per cent of electricity generation is already from renewable sources, with limited low-cost options to reduce emissions (Boston 2015), the government failed to implement relatively straightforward policy initiatives such as setting fuel-efficiency standards for transport, shifting road freight to rail and shipping, and reducing the open-road speed limit to 90 kph (Williams 2017).

Yet what was evident in the tenure of the Key government was an active agenda to weaken any commitment to GHG emissions mitigation, with business and agricultural interests systematically trumping sustainability concerns, even while never abandoning the rhetoric of taking climate change seriously. Key himself never subscribed to climate denialism, unlike Don Brash, his predecessor as party leader, or Rodney Hide, a vocal climate change denier and a former leader of the ACT Party, National's confidence-and-supply partner. In terms of policy practice, however, the net effect of weak climate policies was a lack of action that would have possibly satisfied both Brash and Hide.

The National-led government frequently claimed that the country's deceptively small contribution to global GHG emissions justified taking minimal action. But it is worth noting that even though New Zealand contributes only 0.17 per cent of global emissions, it is ranked the seventh worst in terms of per capita emissions among industrialised countries (Gudsell 2017). Although prior to his election in 2008 Key committed to upholding the country's obligations under the Kyoto Protocol, he had changed his mind by his second term. In 2012, the National-led government withdrew from making legally binding reductions in GHG emissions in the second commitment period of the Kyoto Protocol (from 2013 to 2020), opting instead to report its climate change progress on a voluntary basis. Other than the morally dubious nature of this stance, one consequence

of this has been that New Zealand cannot access the emissions trading mechanisms of the Kyoto Protocol (Boston 2015).

The government's decision to commit to a 30 per cent reduction in GHG emissions below 2005 levels (effectively an 11 per cent reduction below 1990 levels) at Paris in 2015 was widely seen as inadequate. John Key's claim that New Zealand was leading the way in removing fossil fuel subsidies earned the country the inaugural 'Fossil of the Day' award from the Climate Action Network, which said of the prime minister:

Prime Minister John Key showed a degree of hypocrisy by claiming, at a Friends of Fossil Fuel Subsidy Reform event, that New Zealand is a leader on fossil fuel subsidy abolition – despite the country's fossil fuel production subsidies increasing seven-fold since his election in 2008. His phoney grandstanding came just a week after claiming that New Zealand 'doesn't need to be and shouldn't be a leader in climate change'. Are you getting mixed signals too? Or is it just us? (*New Zealand Herald* 2015)<sup>2</sup>

Thus, despite New Zealand's participation in the international negotiations under the United Nations Framework Convention on Climate Change (UNFCCC), its initial endorsement of the Kyoto Protocol, and its early ratification of the Paris Agreement in October 2016, the failure of meaningful domestic policy action undermined its international standing on environmental, and specifically climate change, issues.

On the domestic front, the Emissions Trading Scheme (ETS), set up by the previous Clark government in 2008, was the first time that any government had covered all sectors of the economy and had included the six greenhouse gases specified by the Kyoto Protocol (Barrett et al. 2015, p. 168). The intent of the ETS was to put a price on carbon to 'stimulate efficient reductions in GHG emissions' (Harker et al. 2017, p. 493). By that measure it has been a clear failure. New Zealand's net annual emissions increased by 42.2 per cent from 38 MtCO<sub>2</sub>e [metric tons of carbon dioxide equivalent] in 1990 to 54.2 MtCO<sub>2</sub>e in 2013, according to a 2013 report by the Ministry for the Environment (Harker et al. 2017). The reasons for this failure are many, including the government's reliance on purchasing international carbon credits instead of pursuing domestic policies to ensure emissions reduction. As Macfie (2017) points out, the ETS scheme was 'flooded with Russian and Ukrainian credits from 2011 to 2015, causing the price of carbon to collapse and the scheme to become discredited'

until these fake credits were banned in 2015.<sup>3</sup> This strategy of relying on international credits was not only risky, but it also became a mechanism, wittingly or unwittingly, of sabotaging domestic efforts to reduce emissions – through investment in clean technologies and renewable energy, tree planting, and so on – efforts that could not compete with the cheap overseas credits (Macey 2014; see also MacArthur and Sewerin n.d.).

Despite promising to uphold New Zealand's obligations under the Kyoto Protocol, one of the first acts of the Key government – as part of the National Party's deal with the ACT Party and United Future – was to put the ETS up for review. Several amendments followed, beginning with the repeal in 2009 of 'a partial ban on the construction of new fossil-fuelled electricity generation and a minimum sales obligation on biofuels (0.34% of total sales)' (Bertram and Terry 2010, p. 155). In 2012 the Climate Change Response (Emissions Trading and Other Matters) Amendment Bill 2012 was passed, deferring the agricultural sector's entry into the ETS indefinitely. Each of these amendments was justified by the relevant climate change ministers – Nick Smith, Tim Groser and Paula Bennett – in the name of 'balancing the economic and environmental interests' of the country. A new target of cutting GHG emissions by 50 per cent below 1990 levels by 2050 was set (Ministry for the Environment 2011), but there was no serious plan or discussion about how this goal would be achieved (Macey 2014).<sup>4</sup> In addition to the systematic weakening of the ETS,

many 'complementary measures' developed over the previous decade to help reduce emissions have also been scaled back or terminated. Equally important, at the heart of the government's economic growth agenda are the goals of doubling the value of New Zealand's agricultural exports and expanding the exploration and production of fossil fuels. This represents a high-carbon, not a decarbonisation, strategy. (Boston 2015, p. 490)

Overall, when we weigh up New Zealand's climate policy, its failure is apparent on many fronts. There was a policy vacuum created by the failure of the ETS, together with active constraints on the mandate of local government and the piecemeal nature of policy initiatives (Macey 2014, p. 54). This was compounded by 'a lack of an effective market signal and poor policy integration', as reflected in transport funding, where no attempt has been made to assess the GHG emissions implications of a rapidly expanding road network (Harker et al. 2017, p. 493). The absence of any political will

to take action is, no doubt, a reflection of what Boston (2015, pp. 486–7) describes as the ‘four asymmetries’ that discourage mitigation efforts – a *voting asymmetry*, where those affected by climate change, such as the youth and future generations, have no vote, and those with the vote, who may be adversely affected in the short term by mitigation efforts, vote against them; a *cost-benefit asymmetry*, where costs are incurred by the current generation, while intangible benefits are gained by future generations; *interest group asymmetry*, where those most affected by mitigation efforts – the dairy industry, fossil fuel industry and manufacturers – are well-resourced with significant lobbying powers; and *accounting asymmetry*, where some costs, such as loss of biodiversity and ecosystem damage, are externalised and unaccounted for in the decision-making.

Finally, a fundamental measure of the failure of the Key government’s action on climate change is from the perspective of justice. The consequences of climate inaction are not uniformly experienced. The impacts of climate change disproportionately affect those most vulnerable and marginalised – youth, the elderly, Māori, and, amongst others, New Zealand’s Pacific Island neighbours (Munshi et al. forthcoming; Hayward 2017). Perhaps the starkest point of distinction between the National-led government’s approach to climate policy and that of the newly elected Labour-led government came during the 2017 election campaign, at the Labour Party’s 19 August campaign launch and then subsequently, when Labour leader Jacinda Ardern stated, ‘Climate change is my generation’s nuclear-free moment’. That statement, embracing the ethical imperative for climate action, reset the national agenda with a promise to progress towards carbon neutrality by 2050,<sup>5</sup> contrasting sharply with the ‘business as usual’ approach of the National-led government.

## Water

The issue of fresh water has been of growing public concern, with questions around who takes, uses and owns fresh water, along with concerns about its quality for drinking, swimming and sustaining life, featuring strongly in the media and the 2017 election campaign (Davison 2017f; Water New Zealand 2017). The past decade has seen the ongoing unchecked intensification of dairy farming, with its consequent impacts on both water quality and methane emissions. The statistics are telling:

- 72 per cent of native freshwater fish are threatened with or at risk of extinction (Ministry for the Environment and Statistics New Zealand 2017b)

- More than 60 per cent of rivers are not safe for swimming (Cook 2016)
- 20 per cent of New Zealanders are supplied with potentially unsafe drinking water – this percentage is considered to be significantly underestimated (Government Inquiry into Havelock North Drinking Water 2017, p. 25, 30).

As with climate change policy, the worsening water quality around the country was driven largely by a government agenda so dominated by economic growth that questions of protecting an important natural resource did not really feature.

When National came into government in 2008, freshwater was primarily governed by regional councils using the Resource Management Act by means of instruments such as regional plans and water permits.<sup>6</sup> The inadequacy of earlier policy to effectively address freshwater issues had long been acknowledged (see, for example, Memon 1997), in particular, the need for a national strategy. The development of a National Policy Statement for Freshwater Management (NPS-FM) came out of work undertaken by the Sustainable Water Programme of Action (SWPOA), originally convened in 2003, and the Land and Water Forum, convened in 2008. The first NPS-FM was adopted in 2011 to guide decision-making at regional and district council level, without specifying any limits or standards. The NPS-FM 2014 introduced supporting guidelines with limits via the addition of a National Objectives Framework (NOF), which was subsequently amended in 2017. The NPS-FM 2011 was notable for how long it took to produce, given that it was signalled at the time of the RMA work in the early 1990s. By 2017 the NPS-FM finally had the weight of law behind it (councils must give it effect in their planning), and, with the amended NOF, there were now explicit national bottom lines for water quality.

Despite a concrete water policy finally emerging on a national level under the National-led government, its adequacy and effectiveness have been questioned by experts and the public. For example, the Land and Water Forum was set up to undertake an extensive 'collaborative governance process' for the *A Fresh Look at Fresh Water* project in order to provide recommendations for the government (Smith and Carter 2009). The government's response to the report, involving numerous delays and selective application of the Forum's recommendations, resulted in the frustrated withdrawal of several key Forum members, including Fish and Game and Forest & Bird (Mitchell 2017).

Given the highly charged nature of the debates over deteriorating water quality, including who is to be held responsible and what solutions should be adopted, science became an early victim, bandied about by politicians and farmers, for example, to oppose those calling for changes to the existing water management regime. An interview with John Key on the BBC's *Hardtalk* programme saw the prime minister suggesting that the analysis of water quality by scientist Dr Mike Joy was merely an 'opinion', one that could be countered by other scientists (Manhire 2011). This did little to stem increasing attention on the quality of New Zealand water as part of its 'clean green' brand (Zalk 2017b).

Despite the significance of national standards as contained in the NOF, there was criticism that some standards were an actual weakening of existing ANZECC 2000 standards<sup>7</sup> (in use by many regional councils), resulting in a reduction in water quality in some rivers and lakes (Joy 2015, pp. 42–43). These concerns exploded in the media, along with public protests on the lowering of the 'swimmable' measure in the NPS-FM 2017: it aimed at making '90% of our rivers and lakes . . . swimmable by 2040' (Smith 2017), but the threshold for swimming in terms of *E. coli* presence was set lower than the previous standard.<sup>8</sup> In addition, other measures of water quality were ambiguous or omitted entirely. For example, the 'unders and overs' approach (where one site might degrade, but be offset by improved quality elsewhere in the region or catchment in order to maintain or improve *overall* water quality) evident in the NPS-FM 2014 is still a concern in the current version. The use of the term *overall* is seen as ambiguous and problematic and could result in permanent degradation of a site so as long as it is offset (PCE 2015, 2016a). Critiques of the policy also identified omissions; in particular, one critical indicator concerning freshwater quality, the Macroinvertebrate Community Index (MCI), was absent (Joy 2015; New Zealand Freshwater Sciences Society, 2013; Parliamentary Commissioner for the Environment 2015, 2016a).

Finally, the reliance on traditional mechanisms for addressing water quality (such as fencing – a major focus of government and the industry-led Clean Water Accord, along with national stock exclusion regulations<sup>9</sup>) was also challenged by a variety of actors as inadequate. Research has shown that fencing cannot be the only solution deployed, as it focuses only on a small number of larger streams and rivers, leaving smaller and more prolific waterways open to pollutants, which contribute 77 per cent of the pollution load nationwide (McDowell et al. 2017). The escalation of water

quality concerns became the focus of the Parliamentary Commissioner for the Environment (PCE), whose report *Water quality in New Zealand: Land use and nutrient pollution* (PCE 2013) revealed serious concerns about practices such as dairy conversion and intensification.<sup>10</sup> This shift in land use, intensification and productivity – taking place over two decades from the early 1990s under both Labour- and National-led governments – significantly increased the concentration of phosphate and, in particular, nitrogen going into waterways (PCE 2013). The prime minister, in response, flagged the government's intent to use 'greater science or other techniques to reduce the environmental impacts as we look to increase farm output' (Hickey 2013). This statement reveals both a naïve faith in science and technology and, simultaneously, a refusal to accept scientific advice that has long indicated there was no technological silver bullet that would save the environment from the impacts of growing dairy intensification.

Between 2008 and 2017, water management and allocation became areas of concern, in particular through economic growth initiatives such as irrigation and water bottling. For example, widespread debate and disagreement about how to manage water issues in the heavily irrigated region of Canterbury led to the government dismissing the elected councillors and replacing them with appointed commissioners at the regional council (Institute of Public Administration New Zealand 2010). In addition, potential consents for the bottling of fresh water for export included attempts by NZ Pure Blue to access water in Ashburton in 2016 (Benfield 2017) and Putaruru in 2017. While both were ultimately unsuccessful, local iwi made it clear in their opposition to the Putaruru application that economic gain would not be prioritised at the expense of the environment (Preston 2017). This was in stark contrast to the increased economic value the government were seeking to gain from water and other natural resources (Dinica 2015; Smith 2010).

The focus on 'greening growth' – increasing the economic value derived from natural resources (New Zealand Government 2012a) – also saw water demand increase. This increased demand is particularly evident in irrigation. 'Excluding hydroelectricity consents, irrigation was the largest consented consumptive use of water (65.9 per cent of consents) in the 2013–14 water reporting year (July 2013 to June 2014)' (Ministry for the Environment and Statistics New Zealand 2017a).

Overall, in considering fresh water policy under the National-led government, the picture that emerges is one where the drive for economic

growth and profitability overcame concerns for the environmental protection of a significant resource. Despite the introduction of a national policy statement on fresh water, the overwhelming concern of iwi, the public and scientists about the long-term sustainability of water remained unaddressed.

### Conclusion

Given the broad scope of the environment and the complexity of issues concerning it, environmental policy development can be slow, as has frequently been the case in New Zealand. The National-led government was, in fact, active in environmental policy-making during its three terms in government, and paid specific attention to an area long neglected, namely, freshwater. The development of a set of national standards for water quality was in principle a significant policy contribution, as was the introduction of the Environmental Reporting Act 2015. Both these instruments provide a degree of support to local authorities through management and guidance *from a national level*, which has been lacking in many environmental areas (Macey 2014; OECD 2017c). Yet there are fundamental questions about the direction and effectiveness of the policy-making in actually addressing environmental problems. The state of the environment – and the nature of the relevant policies – across a range of issues, and specifically climate change and water, reveal that policies during the Key era prioritised economic growth over environmental and social sustainability.

One significant determinant of the influence of the executive office of government on the effectiveness of environmental policy in New Zealand is the ‘level of government commitment to environmental values relative to other values’ (Logan 2013, p. 179). During its three terms in office, the National-led government demonstrated an overarching commitment to a neo-liberal economic ideology underpinning a business growth agenda and market principles. In line with such an ideology, there was a reluctance to intervene via regulations and legislation to ensure environmental and social sustainability. Critics say that the removal of environmental sustainability values from legislation on resource management (Palmer 2013), local government (Harker et al 2017) and transport (Smith 2016) have greatly reduced the ability of local authorities and other agencies to address environmental issues. This change also diminished an integrated approach to environmental issues, which has been shown to be critical to the success

of environmental policies, as the sources of environmental pressure are found in many non-environmental policy areas (Bührs 2009, p. 31).

Even DOC, with its mandate to protect the conservation estate, was required to prioritise economic development through the introduction of the 'conservation economy' in the first Statement of Intent by its new National minister (Department of Conservation 2009, p. 7). This signalled changes to the Conservation Act (in 2012 and 2013) and other policies and practices, in line with the Building Natural Resources programme, which aimed at fostering 'business opportunities on public conservation land in order to deliver increased economic prosperity *and conservation gain*' (New Zealand Government 2012a, p. 23, emphasis added). Such an economic growth objective is in stark contrast to the 'hierarchy of legally-prescribed [conservation] objectives for DOC, particularly with respect to national parks' (Dinica 2015, p. 29), with little evidence of conservation gains to date (Dinica 2015).

This economically driven environmental agenda has led not only to the material consequences of a more degraded environment, but also to a sharply evident disjuncture between rhetoric and action. New Zealand's 'clean green' and '100% Pure' rhetoric and branding has increasingly been attacked internationally (Barkham 2017; Macfie 2017; Zalk 2017a), while also being rejected by a significant section of the New Zealand public (Hughey et al. 2016). The reputational damage from negative international attention, and the actual environmental destruction, with its spiralling consequences for people's health and well-being and the long-term sustainability of the country, are both indicators of the National-led government's environmental record.

During the National-led government's tenure, New Zealand was categorised as 'inadequate' or 'insufficient' in terms of its response to mitigating climate change, with policy projections showing an increase in emissions (Climate Action Tracker 2017). The National-led government often presented the country as a good global citizen by continuing to sign up to or support GHG mitigation commitments, but, as noted, this was rarely translated into action. This lack of clarity or detail in policy was also identified by the PCE with respect to environmental reporting. The Environmental Reporting Act states its purpose as being 'to require regular reporting on New Zealand's environment' (Environmental Reporting Act 2015). As the Commissioner observed, "regularity" is not a purpose. . . . Because the environment is so vast and complex, without limits there is no

end to the kinds of statistics that could be collected. . . . Articulating a clear purpose . . . is essential' (PCE 2016b, p. 10). Without clarity of purpose, the conclusions or 'key findings' risk being meaningless.

Overall, the environmental policy legacy of the National-led government is characterised by the triumph of rhetoric over a meaningful commitment to environmental sustainability. The period – which marked the arrival of terms such as the 'conservation economy' and 'greening growth' as part of the prioritisation of neo-liberal economic development values – undermined any genuine possibility of attending to environmental issues. Over its three terms, intentionally or otherwise, the government did much to reveal the hollowness of New Zealand's 'clean and green' image. Equally importantly, the legislative changes and other actions of the government meant that potentially significant actors, such as local authorities and DOC, were weakened in their efforts to address environmental problems. Ultimately, the pursuit of short-term economic growth, along with the desire to keep economically powerful sectors of society happy, has left the country vulnerable to the challenges that lie ahead.

It is perhaps ironic that for a government that prided itself on its economic management, it did little to prepare for the top risks identified by the World Economic Forum in 2018, including the failure to adapt to climate change (Dann 2018a). If one measure of good environmental governance is institutionalising and enacting policies and practices that can anticipate risks and deliver environmental, social and economic sustainability, then there is little on that front that emerges from the National-led government's legacy.