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cc Hon Kieran McAnulty  
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24 February 2023

## Parliamentary Petition on Light Pollution Legislation

Dear Minister,

Lighting Council New Zealand is aware that there is a Parliamentary Petition regarding Light Pollution currently in process.

### **Petition of John Hearnshaw: New Zealand needs a national law to limit light pollution and promote dark skies**

[https://www.parliament.nz/en/pb/petitions/document/PET\\_130407/petition-of-john-hearnshaw-new-zealand-needs-a-national](https://www.parliament.nz/en/pb/petitions/document/PET_130407/petition-of-john-hearnshaw-new-zealand-needs-a-national)

As the representative association for the lighting industry in New Zealand LCNZ has significant concerns about the nature of this petition and the scope and applicability of the supporting information provided.

The issues are outlined below:

- **GOALS**  
LCNZ absolutely supports and endorses the desired goal to reduce the proliferation of light pollution in New Zealand and will participate to the full in collective action to minimise unintended consequences of light at night.
- **APPROACH**  
LCNZ does not support the approach of new national legislation. This would be a heavy-handed and costly intervention and we believe that other less invasive measures exist that would improve the reduction of unintended consequences of light at night.

- **PETITION RESPONSE**  
The parliamentary petition only allows a binary response (sign/not sign) to a proposal that is very limited in its scope. This is unsatisfactory as it only recognises a narrow sector of stakeholder interests, and blocks consideration of other aspects of light at night that are of value to other parties.
- **LIGHTING PROFESSIONAL INPUT**  
The petition does not appear to be informed by any lighting professional input. It is essential to include the views of recognised experts in lighting science, engineering and practice to allow evidence-based decisionmaking.
- **EXISTING STANDARDS, CODES, BYLAWS**  
The petition information does not appear to recognise that there are already AS/NZS technical standards and local council codes and bylaws in place to limit unintended consequences of excessive glare, light nuisance and sky glow. AS/NZS technical standards are well-maintained by lighting expert volunteers, but LCNZ considers that local council codes and bylaws are not well harmonised, well monitored, or well enforced, and there is considerable opportunity to nationally harmonise and tighten implementation practices that would substantially improve light pollution outcomes.
- **WIDER COMMUNITY NEEDS**  
The petition does not address the wider community needs for effective outdoor light at night, for public wellbeing, public safety, personal security, and providing a welcoming ambiance to support hospitality and tourism. It is essential to balance many the facets to achieve acceptable social, economic and environmental outcomes.
- **ECONOMIC REALITIES**  
There is no information in the petition on how the additional costs of monitoring and enforcement of any new legislation would be funded, and resourced with qualified lighting technical expertise.

#### RECOMMENDATION

LCNZ recommends that a multi-stakeholder consultation workshop be organised to properly assess NZ light at night and light pollution issues and to evaluate measures to reduce light pollution via improved harmonisation and implementation of the technical standards, codes and bylaws that already exist.

LCNZ suggests that the Ministry for the Environment acts as a facilitator of such a workshop, in conjunction with GO and NGO agencies relevant to environmental protection and to local government matters.

LCNZ is most concerned that the petition might reach the Select Committee stage without first being informed by appropriate lighting technical and application expertise. This would be wasteful of government and stakeholder time and attention, as any intervention, large or

small, will require the committed buy-in of qualified lighting experts in order to be implemented.

LCNZ would be most responsive to an opportunity to participate, at the earliest stage, in a Wellington meeting for wider debate with all relevant stakeholders.

Chris Byrne - Chair

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*Lighting Council New Zealand is the industry association for lighting manufacturing, importing, and distribution companies in New Zealand, and associated lighting industry participants.*

<http://www.lightingcouncil.org.nz>