



Parliament House
Parliament Buildings
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Attn: Ms Tui Head
Clerk of Committee - Petitions Committee
parliamentary.petitions@parliament.govt.nz

18 September 2024

Parliamentary Petition on Light Pollution Legislation

Lighting Council New Zealand (LCNZ) 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

As the representative association for the lighting industry in New Zealand LCNZ has 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 collaborative action to minimise unintended consequences of Anthropogenic Light at Night (ALAN).
- **APPROACH**
LCNZ does not support the introduction of new national legislation. This would be a heavy-handed and costly intervention and we believe that other less invasive measures exist that would facilitate the reduction of unintended consequences of light at night.
- **PETITION RESPONSE**
The parliamentary petition only allowed a binary response (sign/not sign) to a proposal that is limited in its scope. This is unsatisfactory as it only recognises a narrow sector of stakeholder interests, and does not consider other aspects of light at night that are of value and importance to other stakeholders.

- **LIGHTING PROFESSIONAL INPUT**
The petition does not appear to be informed by lighting professional input. It is essential to include the views of recognised experts in lighting science, engineering, and application to facilitate evidence-based decisionmaking within the parliamentary process.
- **EXISTING STANDARDS, CODES, BYLAWS**
The petition information does not appear to recognise that there are already AS/NZS technical standards and NZ local council planning codes and bylaws in place to limit unintended consequences of outdoor obtrusive light, ie excessive glare, spill light and sky glow. Joint Australia/New Zealand AS/NZS technical standards are maintained by lighting experts and related stakeholders (including astronomical experts). However, 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 practices that would substantially improve the overall performance of light at night, and minimise light pollution issues.
- **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 conditions to support hospitality and tourism. It is essential to balance the many design, and technical facets to achieve acceptable social, economic and environmental outcomes.
- **ECONOMIC REALITIES**
There is no information in the petition identifying any additional costs of specialised lighting schemes, the monitoring and enforcement of proposed new legislation, or how this might be funded, or what incentives or penalties might be necessary to deliver meaningful progress.

RECOMMENDATIONS

- 1) LCNZ recommends that multi-stakeholder consultation workshop/s be organised to properly assess light at night and light pollution issues and to evaluate measures to reduce light pollution via the harmonisation and implementation of the standards, codes and bylaws that already exist.
- 2) LCNZ recommends that the Ministry for the Environment (MFE) act as a facilitator of such workshop/s, in conjunction with government agencies and non-government organisations relevant to environmental protection, tourism development, and local government management.
- 3) LCNZ recommends the development of a 'New Zealand Light at Night Strategic Plan' to identify the desired goals for New Zealand, and to define the roles of local government overall, of each local council, of lighting technology, and of lighting design. This would include the practical realities of financial impacts, funding channels, and methods of regulatory enforcement at the local council level.

It is essential that consideration of the petition be informed by qualified and experienced lighting technology and application expertise, as any government intervention, large or small, will require the committed buy-in of lighting application experts New Zealand wide, in order to be successfully implemented.

LCNZ would be most responsive to an opportunity to collaborate in meetings to advance better light at night outcomes, working alongside other relevant and committed stakeholders.

Yours faithfully,



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>

Note on Lighting Terminology:

The term 'Artificial Light at Night' (ALAN) has historically been used to refer to light at night. The use of the word 'artificial' has been challenged by the global body of lighting scientists the International Lighting Commission (CIE), stating that no light source can be artificial. The CIE now uses the term 'Anthropogenic Light at Night' (ALAN) as a synonym, or more simply Light at Night (LAN). LCNZ adopts this terminology to align with latest international best practice.