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**MANATŪ KAUPAPA  
WAONGA**  
NEW ZEALAND  
MINISTRY OF DEFENCE

16 February 2026

Spencer Jones  
[fyi-request-33540-65f3e43a@requests.fyi.org.nz](mailto:fyi-request-33540-65f3e43a@requests.fyi.org.nz)

Dear Spencer

## RESPONSE TO YOUR OFFICIAL INFORMATION REQUEST

Thank you for your email of 20 January 2026, in which you requested, pursuant to the Official Information Act 1982 (the Act), the following:

*Please provide copies of any records held by the Ministry of Defence that fall within the following classes:*

1. *Policies, directives, or guidance documents relating to the management of environmental or airborne hazards on Defence estates (including biological, particulate, or chemical hazards).*
2. *Documents relating to record-keeping and retention requirements for hazard management records, including any disposal authorities relied upon.*
3. *Correspondence between the Ministry of Defence and NZDF, contractors, or other agencies relating to:*
  - a. *environmental hazard management;*
  - b. *monitoring or testing regimes;*
  - c. *incidents or exceedances;*
  - d. *record retention or destruction.*
4. *Any reviews, audits, or assurance activities concerning environmental or airborne hazard management or record-keeping.*

### *Records not held*

*If any information within scope is stated to be “not held”, please advise:  
whether the information was ever created;  
if created, the retention policy or disposal authority relied upon;  
the date and scope of any destruction or transfer;  
whether another agency or contractor may hold the information.*

I understand you have made similar requests to the New Zealand Defence Force (NZDF) and the Environmental Protection Authority (EPA). I refer you to their responses regarding material generated by those agencies. Please consider this response relating only to material generated by the Ministry of Defence (the Ministry).

The Ministry conducts audits of NZDF hazardous substance controls and compliance across all NZDF camps and bases. The Ministry does not hold responsibility for the operation or management of defence estate and infrastructure.

The Hazardous Substances and New Organisms Act 1996 (HSNO Act) instructs that the Secretary of Defence:

*shall audit the EPA controls on hazardous substances under the control of the Minister of Defence, and report the results to the Minister for the Environment and the Minister of Defence*

The NZDF is responsible for issuing policies, directives, or guidance documents relating to the management of hazardous substance controls and compliance. The NZDF are also responsible for conducting hazard management, monitoring, testing, and responding to hazardous substances audit recommendations.

The separate elements of your request have been numbered for administrative purposes.

1. *Policies, directives, or guidance documents relating to the management of environmental or airborne hazards on Defence estates (including biological, particulate, or chemical hazards).*

As explained above, the Ministry has no role in the management of environment or airborne hazards on Defence estates. As such, this element of your request is declined, pursuant to section 18(g)(i) of the Act as the information requested is not held.

2. *Documents relating to record-keeping and retention requirements for hazard management records, including any disposal authorities relied upon.*

As above, this element of your request is declined, pursuant to section 18(g)(i) of the Act, as the Ministry only holds hazardous substances records relating to audit reports.

3. *Correspondence between the Ministry of Defence and NZDF, contractors, or other agencies relating to:*
  - a. *environmental hazard management;*
  - b. *monitoring or testing regimes;*
  - c. *incidents or exceedances;*
  - d. *record retention or destruction.*

As your request spans 25 years, and has a significantly broad scope, this element of your request is declined, pursuant to section 18(f) of the Act, as it would require substantial collation or research. For the Ministry to satisfy this element of your request, you would need to identify specific incidents or activities that you are interested in. Given the Ministry's functions, I would expect any such information to arise primarily in relation to the Ministry's audit work, and that key details would be addressed in the reports identified in response to question 4 below.

4. *Any reviews, audits, or assurance activities concerning environmental or airborne hazard management or record-keeping.*

The following documents are considered in scope of your request. In some instances, final summary reports, which were approved by the Minister of Defence, have been provided in accordance with section 16(e) of the Act, whereby a summary of information can be provided in place of the full reports. The summary reports accurately reflect the information contained in the full reports.

<b>Hazardous Substance Management Audits and Reviews</b>			
<b>#</b>	<b>Title</b>	<b>Year</b>	<b>Availability</b>
1	<i>Audit of NZDF's Hazardous Substances Controls and Compliance - Phase 2</i>	2025	Available shortly
2	<i>Audit of NZDF's Hazardous Substances Controls and Compliance - Phase 1</i>	2024	Available shortly
3	<i>Hazardous Substances Management in the New Zealand Defence force</i>	2016	<a href="#">Available from the Ministry's website</a>
4	<i>Controls on Hazardous Substances in Weapons Systems</i>	2012	Available shortly
5	<i>Controls on Hazardous Substances Not Contained in Weapons Systems</i>	2010	National Library
6	<i>HSNO Monitoring and Audit in the NZDF</i>	2007	National Library
7	<i>Environmental Management in the NZDF</i>	2006	National Library
8	<i>Controls on Hazardous Substances Not Contained in Weapons Systems</i>	2005	National Library
9	<i>Controls on Hazardous Substances in Weapons Systems</i>	2004	National Library
10	<i>Implementation of HSNO in the NZDF</i>	2003	National Library
11	<i>HSNO Preparations</i>	2001	National Library

The 2025, 2024, and 2012 reports considered in scope of your request are currently being prepared for public release. These three reports that will be available shortly will be published on the Ministry's website at <https://www.defence.govt.nz/publications>. Please note that these reports will involve some redactions pursuant to the following sections of the Act, in order to:

- Protect the privacy of natural persons [section 9(2)(a)];
- maintain the effective conduct of public affairs through the free and frank expression of opinions by or between or to Ministers of the Crown or members of an organisation or officers and employees of any department or organisation in the course of their duty [section 9(2)(g)(i)]; and
- prevent the disclosure or use of official information for improper gain or improper advantage [section 9(2)(k)].

As the reports are or will shortly be made publicly available, your request for them is declined, pursuant to section 18(d) of the Act. Details about requesting information held by the National Library are available at <https://natlib.govt.nz/researchers/registering-and-requesting>. The 2016 report is available at the Ministry's website at: <https://www.defence.govt.nz/publications/hazardous-substances-management-in-the-new-zealand-defence-force/>.

Please note: In 2019, a hazardous substances audit was started, but due to disruptions during the COVID-19 pandemic, as well as questions relating to the applicability of the newly introduced Hazardous Substances and New Organisms Amendment Act 2015 ('HSNO Amendment Act') against the NZDF codes of practice, this audit was not completed. Material

relating to this audit is withheld in full, in accordance with the following grounds of the Act, in order to:

- maintain the effective conduct of public affairs through the free and frank expression of opinions by or between or to Ministers of the Crown or members of an organisation or officers and employees of any department or organisation in the course of their duty (section 9(2)(g)(i)); and
- maintain the constitutional convention for the time being that protect the confidentiality of advice tendered by Ministers of the Crown and officials (section 9(2)(f)(iv)).

Where information is withheld under section 9(2) of the Act, the public interest is not considered to outweigh the need to protect that information.

Under section 28(3) of the Act you have the right to request the Ombudsman to investigate and review this response.

Yours sincerely

Anton Youngman  
**Deputy Secretary, Strategy Management and Assessment**