



29 October 2024

OIAD-1274

9(2)(a)

Dear 9(2)(a)

Thank you for your email of 21 September 2024 requesting the following under the Official Information Act 1982 (the Act):

- 1. Please consider this correspondence to be a request pursuant to the Official Information Act 1982.*
- 2. Does Ministry for the Environment pay for advertising services on the Face book, Instagram, LinkedIn, Google, Tik Tok or other digital platform?*
 - a. If so, how much money has been spent, by year, on advertising on each of these platforms?*
 - b. Does Ministry for the Environment use any agencies to place or manage that advertising, if so who?*
 - c. If Ministry for the Environment uses any agencies to place or manage that advertising, what is (or are) the names of each of those agencies?*
 - d. If Ministry for the Environment uses any agencies to place or manage that advertising, please provide copies of any and all legal agreements between that advertising agency and Ministry for the Environment.*
- 3. If Ministry for the Environment uses advertising services on digital platforms as above, does (or has) the agency created "custom audience" lists as part of those campaigns?*
 - a. If so, please provide a list of the custom lists that have been generated, including the number of people on that list and what market segmentation was being targeted by that campaign and the date for which each custom audience was generated, along with when these audience lists were uploaded and to which platform?*
 - b. If so, what privacy analysis was conducted prior to custom audience lists being generated?*
 - c. If so, was the Minister responsible ever made aware that Ministry for the Environment was undertaking this activity? If so, which Minister was it, and when were they notified?*
 - d. If so, what advice was sought prior to this activity taking place?*
 - e. If so, what lawful basis does Ministry for the Environment rely on for this disclosure?*
 - f. If so, what was the origin of the information that was included in these custom audience lists?*
 - g. If so, did Ministry for the Environment receive any specific advice as to the efficacy of the security measures around these lists, if so, who provided this advice and when was it provided? Please provide copies of the advice provided.*
 - h. If so, what security measures are used to protect the privacy individuals?*

- i. If so, is Ministry for the Environment still generating and uploading custom audiences, or is this practice "on hold". If it is on hold, when and why was it put on hold?*
- j. If so, can people "opt-out" of being included these custom audience lists, and if so, how many people have done so?*
- k. If so, has Ministry for the Environment received any complaints about this practice, if so, when was the complaint received? Please provide copies of the complaints and a responses.*
- l. If so, did Ministry for the Environment consult with the office of the Privacy Commissioner on this practice? If so, when?*
- m. If so, has Ministry for the Environment received any reports about the effectiveness of custom audience lists? If so, please provide these.*
- n. If so, for each upload of the custom audience lists to each platform, what percentage of these were "matched" against the current users of each platform?*
- 4. Has any person from Ministry for the Environment had any meetings, whether in person, by videoconference or other method, with any representative from Meta, Google, LinkedIn, Tik Tok, or any other digital advertising platform in the last 12 months?*
- a. If so, who was present during these meetings?*
- b. If so, please provide the agenda, notes, minutes and any communications associated with these meetings.*
- c. Does Ministry for the Environment have a dedicated account manager with Meta, Google, LinkedIn, Tok Tok or any other digital advertising platform. If so, what is the name of this person or the names of these people?*
- 5. Please provide any correspondence, e-mail, document, or record held by Ministry for the Environment on the subject of custom audience lists, advertising on Meta, Face book, Instagram, Google, Tik Tok or any other platform for the period 1 September 2024 and today.*

The Ministry for the Environment (the Ministry) is extending the timeframe for its response to point 4 of your request under section 15A(1)(b) of the Act, as consultations necessary to make a decision on that point of your request are such that a proper response cannot reasonably be made within the original timeframe.

We will now respond to point 4 of your request on, if not before, 26 November 2024, which is an extension of 20 working days.

In response to point 2 of your request, please note that the Ministry pays for advertising through the following platforms:

- Meta Business; and
- Google.

The table below shows what the Ministry has spent on advertising through social media campaigns over the past five years:

	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024
Social spend	\$19,330.74	\$11,702.40	\$17,660.88	\$24,142.74	\$26,867.00

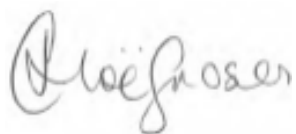
The Ministry is refusing points 3 and 5 of your request under section 18(g)(i) of the Act, as the information requested is not held by the Ministry, and we have no grounds to believe it is held by any other agency.

Regarding point 3 of your request, please note that the Ministry does not customise its audience lists. We use generic metrics provided by each platform to create targeted campaigns. These metrics are based on a user's profile and the data they share with the platform. This is managed through the platform and the use of the platforms' terms and conditions.

You have the right to seek an investigation and review by the Office of the Ombudsman of my decision relating to this request, in accordance with section 28(3) of the Act. The relevant details can be found on their website at: www.ombudsman.parliament.nz.

Please note that due to the public interest in our work the Ministry for the Environment publishes responses to requests for official information on our [OIA responses page](#) shortly after the response has been sent. If you have any queries about this, please feel free to contact our Ministerial Services team: ministerials@mfe.govt.nz.

Yours sincerely



Chloe Groser
General Manager – Communications and Engagement
Ministry for the Environment | Manatū Mō Te Taiao