

16 May 2025

File Ref: OIAPR-1274023063-38856

By email: [REDACTED]

Tēnā koe [REDACTED]

Request for information 2025-131

I refer to your request for information dated 23 April 2025, which was received by Greater Wellington Regional Council (Greater Wellington) on 23 April 2025. You have requested the following:

- “1. All correspondence (including but not limited to emails, briefings, file notes, instant messages, and minutes) related to Greater Wellington Regional Council’s social media posts using generative AI.*
- 2. Has Council considered the environmental impact of using generative AI for social media posts?*
- 3. What research, analysis or discussion did Council undertake into using generative AI for social media posts before doing so?*
- 4. Did Council undertake research, analysis or discussion on its use of generative AI for social media posts after doing so?”*

Greater Wellington’s response follows:

- 1. All correspondence (including but not limited to emails, briefings, file notes, instant messages, and minutes) related to Greater Wellington Regional Council’s social media posts using generative AI.*

AI generated imagery has only been used for one trend, namely: action figure starter pack.

The majority of discussion about the action figure starter pack was kanohi ki te kanohi (in-person, face-to-face between Greater Wellington staff members).

Attached you will find screenshots of Teams messages which followed the in-person discussions (**Attachment 1**).

2. *Has Council considered the environmental impact of using generative AI for social media posts?*

Yes. Greater Wellington has an Artificial Intelligence Policy to help guide and embrace the potential use of AI in all our work (including social media) at Greater Wellington. The policy is provided as **Attachment 2**.

This policy is all about making sure we use AI tools responsibly and ethically while being mindful of the risks. The policy provides guidance on protecting Greater Wellington information including Māori data ownership and sovereignty. It highlights things to watch out for like checking errors, managing privacy and considering the environmental impact of AI.

Research, analysis and discussion at the time focused on data which has shown that image creation using AI can consume up to 0.011 kWh of energy per image. For this campaign we created 5 images (using up to 0.055 kWh of energy).

For comparison, an estimate of one of our designer's daily energy consumption needs (computer and related design equipment) sits somewhere between 1-3kWh per day, with the variation dependent on the type of equipment used, the amount of time spent working, and workplace factors such internet use, storage, lighting and heating.

3. *What research, analysis or discussion did Council undertake into using generative AI for social media posts before doing so?*

In-house designer workload

Analysis and discussion around in-house designers' capacity occurred when these images were needed. They did not have capacity. Instead, our in-house design team were focused on existing priorities and designing critical Greater Wellington campaigns, such as Local Water Done Well, Easter Public Transport disruption, Road Safety Week, Pest Management, Local Body Elections, and Kāpiti Community Fund, among others.

Energy consumption

As above, research, analysis and discussion at the time focused on data which has shown that image creation using AI can consume up to 0.011 kWh of energy per image. For this campaign we created five images (using up to 0.055 kWh of energy).

For comparison, an estimate of one of our designer's daily energy consumption needs (computer and related design equipment) sits somewhere between 1-3kWh per day, with the

variation dependent on the type of equipment used, the amount of time spent working, and workplace factors such internet use, storage, lighting and heating.

Speed to market

Discussion, analysis and decision making here focused on the need to create images quickly to enable Greater Wellington to participate in global social media trend. With our in-house designers not available and the energy consumption needs considered, our Social Media Advisor created the images in AI to capitalise on the trend. Discussion then centred on quality assurance of the generated images: fit to brand, errors and cultural bias inherent in some AI generated images.

4. Did Council undertake research, analysis or discussion on its use of generative AI for social media posts after doing so?

Discussion and analysis after the posts focused on the engagement metrics and future AI use.

Engagement

Greater Wellington successfully capitalised on the global trend.

The posts were viewed 35,974 times, reaching 24,272 people, with 275 interactions (the number of post likes or reactions, saves, comments and shares).

73 people liked the post (on Instagram), 66 people liked the post (thumbs up emoji), 22 loved it (heart emoji), 32 laughed (laughing face emoji), and 6 people were angry with the post (red face emoji).

Future AI use

Future AI use will continue to be guided by Greater Wellington's AI policy.

If you have any concerns with the decision(s) referred to in this letter, you have the right to request an investigation and review by the Ombudsman under section 27(3) of the Local Government Official Information and Meetings Act 1987.

Please note that it is our policy to proactively release our responses to official information requests where appropriate. Our response to your request will be published shortly on Greater Wellington's website with your personal information removed.

Nāku iti noa, nā



Luke Troy
Kaiwhakahaere Matua Rautaki | Group Manager Strategy

Proactive Release

11/04 1:09 pm

Hiya, there is a current trend going round social where people are using AI to create action figures/barbie figures that look like you. Ella had a really good idea to do this trend but with park rangers



This is mine



Ella Makan 11/04 1:10 pm



Sarah Mildon 11/04/2025 1:09 pm

This is mine

I just notice the wedding mag 😊

11/04 1:10 pm

It's a new addition but it's perfect.

Ella Makan 11/04 1:13 pm



Sarah do you put in prompts ?

11/04 1:14 pm

I've maxed out my image generation for my email account, I'll make a secondary one



Ella Makan 11/04 1:15 pm



here is one I saw from massey



Type a message



11/04 1:18 pm

Create a ken style image of a action figure. The action figure should have ken features and a stoney creek windproof twin zip top and matching cargo shorts, hiking boots and a sun cap. Please include, "Greater Wellington Park Ranger" at the top. Make it feel trendy, diverse, and include accessories that reflect what they do such as a toyota hilux, a mānuka tree, toilet paper and a shovel.

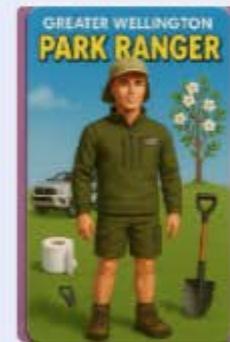


This is the prompt, the image is being created

I based the prompt on my halloween discription

toilet paper is new though

Attempt one



Ella Makan 11/04 1:22 pm



Can he be in a box? -I think it needs that context to be less...disturbing



11/04 1:23 pm

Yeah you have to add to the prompts to make it better.

Ella Makan 11/04 1:26 pm



I like the outfit though

11/04 1:27 pm



Proactive Release

I like this one

Ella Makan 11/04 1:28 pm



yeah the box is better!

Laura Keown 11/04 1:53 pm



That's very good! Can we put an eel and/or a korerū in it too?

Not everything will fit in but an animal would be fun

Ella Makan 11/04 1:54 pm



A korerū would be great

11/04 1:55 pm

Image is generating

Ella Makan 11/04 1:56 pm



standing by

11/04 1:58 pm

It gave us three Kōreru



I've hit the limit of image creation but it made the loo paper a ute at the same time



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Laura Keown 11/04 2:04 pm

LK Okay haha, the first one without the loo roll car was better 🤔

11/04 2:04 pm

Agree might have to go with that one

This one it is



Edited

Copy:

Get yourself a Greater Wellington Park Ranger action figure while stocks last.

Image created by AI and **does not reflect a real product.**

In the comments, learn more about the 33,000 hectares of regional parks here: <https://www.gw.govt.nz/parks/>



Parks | Ngā Papa Whenua | Greater Wellin... ✕
Description - Greater Wellington looks after 33,000 hectares of public parks from Wairarapa and Kapiti all the...
www.gw.govt.nz



11/04 2:15 pm

Ella Makan the park ranger is okay with the AI policy?

Ella Makan 11/04 2:15 pm

Ohhhh good point.

Ella Makan 11/04 2:15 pm



Ohhhh good point.

11/04 2:16 pm

you're the expert, should we check with BID?

Ella Makan 11/04 2:16 pm



Basically it talks about getting stuff like this checked with our team so not sure what the best practice is there.

Yeah I recon check with bid

And maybe the the bottom of the copy say that this was generated by ai and is not reflected of a real prpd

Product*

11/04 2:18 pm

I'm just adding everyone into a group chat at this point.

Ella if you're in the office, maybe that's easier if you could please go talk to someone?



Sarah Mildon added Owen Smith to the chat and shared all chat history.

11/04 2:25 pm Edited

Owen Smith This is the image



Laura Keown 11/04 2:26 pm



This might be ok, since everyone will know AI made this, but the tool in the bottom right... that's weird. It's not a real thing.

11/04 2:28 pm

Yeah it's tried to make two spades similar to the other one that turned loo paper into a ute.

Laura Keown 11/04 2:28 pm



It's close enough to a thing that it might be ok haha. A hoe?

Type a message



Laura Keown 11/04 2:28 pm



It's close enough to a thing that it might be ok haha. A hoe?

11/04 2:28 pm

that was what I was thinking too



Owen Smith 11/04 2:30 pm



I think the clothing label needs to change, as it's too close to the brand name, and what is Spack? Otherwise looks good!



11/04 2:30 pm

Matt wants it removed too, I shared it with my team.

Thanks Owen

Owen Smith 11/04 2:31 pm



Spare toilet roll is funny!

11/04 2:31 pm Edited

That came from when I met with ranger Steve, its a never ending supply in the back of the ute

I replaced the logo with our one



11/04 3:12 pm

A Wāhine ranger



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11/04 3:12 pm

A Wāhine ranger



do they european ones or is it just the Maori ones
Racism with AI who would have thought

Monday, 14 April

14/04 4:43 pm



What a good line



Ella Makan 14/04 4:45 pm



where would get crucified if we said that

the wee bus is so cute

14/04 4:46 pm

I would be terrified to be on social. It was scary enough as it is today let alone saying that



Greater Wellington Artificial Intelligence (AI) Policy	
Purpose	This policy establishes guidelines for the responsible use of Artificial Intelligence (AI) Tools within Greater Wellington to maximise benefits while managing associated risks.
Vision	To harness AI's potential in enhancing operational efficiency, decision-making, and innovation, while ensuring ethical, transparent, and secure practices in line with Greater Wellington values.
Rationale	AI offers transformative capabilities that can improve services, streamline processes, and deliver insights. However, it also presents risks such as bias, privacy concerns, and ethical implications. This policy seeks to strike a balance between leveraging AI for progress and mitigating potential harms.
Policy Owner	Chief Technology Officer
Responsibilities	ICT
Application	This policy applies to all Greater Wellington employees, service providers and volunteers.
Related Policy and Legislation	<ul style="list-style-type: none"> • Information Technology Security and Appropriate Use Policy 2021 • Information Management Policy 2020 • Te Tiriti Policy (draft due for release June 2025) • Privacy Policy 2023 • Privacy Breach Response Guidance 2023 • Privacy Risk Management Guidelines 2023 • Code of Conduct 2015 • Office of Privacy Commissioner AI Guidance – 2023 • Public Service Responsible AI Guidance - 2025 • Privacy Act 2020 • Human Rights Act 1993 • Copyright Act 1994 • New Zealand Bill of Rights Act 1990 • Public Records Act 2005
Effective Date	12 April 2025
Review Date	12 April 2026 - one year subsequent to the policy's approval.

Approved:  _____
 Chief Executive

Date: 11 April 2025 _____

<h2>Greater Wellington Artificial Intelligence (AI) Policy</h2>	
Purpose and Principles	<p>Greater Wellington (GW) will ensure the responsible use of AI by promoting transparency, managing risks, and safeguarding data privacy.</p> <p>Our policy aims to empower staff with AI tools while maintaining ethical standards, legal compliance, and the integrity of our information systems.</p> <p>We will ensure that Greater Wellington Information including mātauranga Māori / data is protected and managed while using AI.</p> <p>We will actively monitor AI usage, provide necessary learning and development, and include AI in ICT governance to mitigate risks and ensure the correctness of AI outputs.</p> <p>This approach will foster trust in AI technologies and encourage their appropriate, effective and secure use within the organisation.</p>
Policies	<p>Under this policy, all GW Employees and Service Providers are required to:</p> <ol style="list-style-type: none"> 1. Participate in learning and development and follow guidelines for AI use. 2. Understand, manage and mitigate risks before using AI. 3. Use GW Approved AI Tools where suitable and available 4. Ensure transparency in the use of AI tools. 5. Safeguard and protect Greater Wellington Information. 6. Comply with legal and regulatory requirements related to AI. 7. Verify the accuracy and fairness of AI-generated outputs. 8. Consider the environmental impact of AI 9. Report and respond swiftly to AI-related incidents and breaches.
Guidelines	<p>Links to:</p> <ul style="list-style-type: none"> • Greater Wellington Artificial Intelligence Usage Guidelines • ICT Self Service Portal / AI Assessment • GW Applications Catalogue / AI Tools
Definitions	<p>AI Tools – refers primarily to Generative AI - artificial intelligence systems designed to create new content, such as text, images, audio, or video, based on learned patterns from existing data. More generally refers to any solution, application or service that employs Artificial Intelligence approaches, concepts or technologies.</p> <p>Greater Wellington Approved AI Tool – AI Tool that has been reviewed under this Policy and for which appropriate risk mitigation and data protection measures are in place.</p>

	<p>Public AI Tool – AI Tool available for public use on the web that is not constrained by an agreement with Greater Wellington around the reuse of submitted data and information.</p> <p>Personal Information – any data or information which tells you something about a specific living individual, including details that could identify someone, either on its own or when combined with other information.</p> <p>Greater Wellington Information – any data or information owned by Greater Wellington or for which GW has a contracted or agreed management or stewardship role (e.g. mātauranga Māori / data, copyrighted material and/or commercially sensitive information).</p> <p>Greater Wellington Identity – login credentials employing your Greater Wellington email address and/or other ICT approved GW authentication method.</p> <p>Greater Wellington Employee includes, but is not limited to: permanent employee, fixed term employee, casual employee, contractor on the Greater Wellington payroll or intern.</p> <p>Service Provider means an organisation or person that works with or for Greater Wellington (including contractors and consultants).</p> <p>Office of Privacy Commissioner AI Guidance – “The Office of the Privacy Commissioner’s Guidance on Artificial Intelligence and the Information Privacy Principles” (September 2023)</p> <p>Public Service Responsible AI Guidance – “Responsible AI Guidance for the Public Service: GenAI NZ Digital government”, released by the Digitising Government Minister on 3 February 2025.</p>
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Greater Wellington AI Usage Guidelines	
Participate in learning and development and follow guidelines for AI usage	<ul style="list-style-type: none"> • Complete AI training or other AI learning and development when offered. • Follow Greater Wellington Procurement Guidelines for AI Tool license, subscription or other costs. • Complete appropriate due diligence for AI tools to understand the provider of the service, their data use and privacy policies.
Understand, manage and mitigate risks associated with using AI Tools	<ul style="list-style-type: none"> • Before commencing use of a new AI Tool complete an AI Assessment to advise your intention and identify risks around bias, ethical, accuracy and data reuse. • A Security Risk Assessment may be required to identify and mitigate technology risks. • A Privacy Threshold Assessment may be required to identify and assess Privacy risks.
Use GW Approved AI Tools where suitable and available	<ul style="list-style-type: none"> • Use an existing Greater Wellington Approved AI Tool if one is available that meets your requirement. All approved GW AI Tools are listed in the ICT Applications Catalogue. • Use your GW Identity when authenticating into Greater Wellington Approved AI Tools. This will assist with any subsequent disclosure requests and allow GW to put in place safety measures for Greater Wellington Information.
Ensure transparency in the use of AI Tools	<p>To maintain public and internal trust and accountability, ensure that use of AI Tools is disclosed.</p> <ul style="list-style-type: none"> • Be prepared to provide information about your AI use if needed. Consider the level of risk and any legal or contractual obligations when determining what details to document. • Consider your context and audience when deciding how you should disclose your use of AI Tools. • Consult with the GW Communications team for advice before using AI generated content in any external communications including to stakeholders or the public.
Safeguard and protect Greater Wellington information.	<p>Keep Greater Wellington Information within GW.</p> <ul style="list-style-type: none"> • When using a Public AI Tool do not submit: <ul style="list-style-type: none"> ○ Your or anyone else's Personal Information ○ Confidential or commercially sensitive information ○ Greater Wellington Information (as defined above)

	<p>When using a Greater Wellington Approved AI Tool:</p> <ul style="list-style-type: none"> • Anonymise or aggregate Personal Information to protect identification of individuals. • Consult with data and information owners before using their data and information. Consultation is essential to identify and address any concerns around appropriate data management within the GW Information Management Policy guidelines and considering the GW Te Tiriti Policy. This might include data sharing agreements or Māori data sovereignty concerns, for example.
<p>Comply with legal and regulatory requirements relating to AI.</p>	<ul style="list-style-type: none"> • Use AI tools ethically, avoiding any actions that could lead to unethical, inappropriate, or illegal outcomes. • Do not submit any copyrighted information to AI tools. • Ensure that any intellectual property within AI generated content is licensed for its intended use. • Consider your responsibilities under the Greater Wellington Code of Conduct when using AI Tools.
<p>Verify the accuracy and fairness of AI-generated outputs.</p>	<p>Before publishing or making decisions based on AI generated content, be aware that AI Tools may provide misleading, biased or inaccurate outputs.</p> <ul style="list-style-type: none"> • Proof read the AI generated copy in full. • Fact check generated information with other sources. References and sources need to be available on request. • Be aware of potential bias in AI Tool outputs. Bias may perpetuate stereotypical or unfair treatment related to race, sex and gender, ethnicity, or other protected characteristics.
<p>Consider the environmental impact of using AI Tools</p>	<p>AI has a significant environmental impact, mainly due to the energy consumption required for training and running AI models.</p> <ul style="list-style-type: none"> • Consider the benefits of potential productivity and/or efficiency gains of using AI tools.
<p>Report and respond swiftly to AI-related incidents and breaches.</p>	<ul style="list-style-type: none"> • Use the existing Privacy Incident or ICT Incident reporting procedures to report any AI related incidents as soon as you become aware of them.