



SUBMISSION ON "MEASURING UP" ENVIRONMENTAL REPORTING - A DISCUSSION DOCUMENT

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Introduction

This submission is presented by Southern District Health Board (Southern DHB). Through its public health service "Public Health South (PHS)" Southern DHB delivers public health services to 304,000 people who live in Otago and Southland. Public health services are offered to populations rather than individuals and are considered a "public good". They fall into two broad categories – health protection and health promotion. They aim to create or advocate for healthy social, physical and cultural environments and are often "invisible" until there is a problem. Positive outcomes are realised in the long term.

This submission relates to the discussion document "Measuring Up" Environmental Reporting.

The proposed Environmental Reporting Bill referred to in the discussion document is of direct relevance to public health. The environment is a key determinant of health. A healthy environment, including clean air and water, enables us to live healthy lives. High quality and accessible environmental data (for example, relating to air, water and soil quality as well as factors affecting these) will be important in further defining the cause and effect relationship between the state of the environment and human health. In time it will not only serve to provide a sound basis for targeting environmental health interventions to improve human health and wellbeing, but also assist in evaluating the effectiveness of current and future interventions.

Comments

Rather than comment on all the consultation questions we have provided feedback on the issues which we deem most relevant to the overall effectiveness of the document.

Issues and objectives pp.12

Public Health South overall agrees with Issues One and Two and the stipulated objectives. We acknowledge the lack of a legislated mandate for environmental reporting in New Zealand and strongly support the proposal to undertake regular reporting on environmental indicators in accordance with robust internationally recognized protocols as soon as practicable.

Assessment criteria, options and Environmental Act Amendment pp.15-24

Environmental data used to help form policy to improve population health, should be as free from bias as possible. Therefore, we support the intention for the responsibility for the production of the 5-yearly report on New Zealand's state of the environment to be vested with the Parliamentary Commissioner for the Environment (PCE). In providing this support we note that it seems likely the PCE will require additional resources and staff to fulfill this task.

Environmental domains pp.22

Public Health South is supportive of the environmental domains that are discussed in this document. However we are concerned about what will happen to existing monitoring results and that changes in monitoring strategies/methodology may postpone action for environmental concerns that have already been identified given the potential lack of continuity of the data. For instance, if a regional council has identified a water body that is polluted as determined by indicator "x", we do not want this monitoring to be discredited because the preferred methodology had changed to "y". Therefore, we recommend that historical monitoring is taken into consideration in the process of selecting indicators, their sites and methodologies.

Public Health South views with some concern those data indicating a rapid decline in water quality in some parts of Southland and Otago. It is for this reason that we believe that water should be prioritized for improvements in data consistency.

RMA amendment pp.25

Given that Public Health South has a relationship with three Regional Councils and eight local authorities and given that each have different priorities in environmental reporting we strongly support a legislated framework on which to base future standardized environmental reporting. Such an approach would improve our efficiency in monitoring environmental indicators with relevance to human health

across the region. Furthermore, consistent and accessible reporting will assist us in mitigating the risk to human health in a timely fashion.

We suggest the legislation mandates the overall reporting framework; the domains; the organization responsible for the report production; and the frequency its production. However, we argue that it is not the role of legislation to specify details of environmental variable monitoring such as sample sites and sampling methodology. Alternatively, the legislation could refer to existing guideline documents that specify these details (for example, the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC 2000)).

Thank you for allowing us this opportunity to submit.