

**Submission on *“Measuring Up: Environmental Reporting – a discussion document”***

**Environment Southland**

**To:**  
 Submission on proposed Environmental Reporting Bill  
 Ministry for the Environment  
 PO Box 10362  
 Wellington 6143

**Name of submitter:**  
 Environment Southland

**The submission relates to:**

This is a submission from Environment Southland in relation to *“Measuring Up: Environmental Reporting – A Discussion Document”*, in respect of a proposed Environmental Reporting Bill.

This submission is to be read on a without prejudice basis at the moment as Environment Southland's Council has not had the opportunity to peruse it. The Environmental Management Committee will consider the submission for approval on 19 October 2011. We will advise you if there are any changes to the submission as a result of this meeting as soon as possible.

**The submission is:**

While Environment Southland supports the intent and issues raised within the proposed Environmental Reporting Bill, the future framework and objectives of the proposed Bill are of concern.

The programme needs further detail and consultation with Local Government prior to legislation being progressed, in particular:

- 1/ Additional detail is required on the future reporting frameworks and indicators for each environmental domain highlighted being; fresh water, land, oceans, air and biodiversity, so that implications for the region can be considered.
- 2/ Environment Southland has an established monitoring programme and key sites where data is collected and assessed against policy provisions for effectiveness and

key environmental indicators or issues. There is concern that the monitoring sites may no longer fit the new national framework criteria. For example a river that has been monitored for 15 years may no longer fit the new criteria, so a new monitoring site would need to be established, potentially with different monitoring methods. We would seek that the future framework would support existing environmental monitoring programmes.

- 3/ Request further details on how the national environmental reporting framework would be funded. Concerns include potential implications for ratepayers in terms of potential changes required in data management and resourcing, implications for annual budgets and existing environment enhancement projects and policies.

Furthermore, Environment Southland supports the Local Government New Zealand (LGNZ) submission.

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