



Forest & Bird
GIVING NATURE A VOICE

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**MEASURING UP:
ENVIRONMENTAL REPORTING – A DISCUSSION DOCUMENT**

Forest & Bird submission

Summary

An effective voice for nature requires adequate information on which to speak out. Forest & Bird therefore supports this proposal for environmental monitoring and reporting. We note that it would bring New Zealand into line with the rest of the OECD, and would implement OECD and PCE recommendations.

The discussion document proposes two legislative changes. We agree that, if implemented, these are likely to be an improvement on the status quo.

While the Office of the Parliamentary Commissioner for the Environment (PCE) is the best place to locate the environment reporting function, any risk of the new role not being properly funded would need to be addressed.

Standardising information gathered by local authorities under the Resource Management Act is a good move. However, there are limitations to what is proposed, and we welcome the proposal to further consult in early 2012 on the drafting of the regulations. This will be an important aspect of the ability to meaningfully report on the state of the environment.

Submission

Forest & Bird agrees that environmental information should underpin environmental and economic decision-making in New Zealand. It is also important to measure and monitor the impact of decision-making. To achieve that, New Zealand's legislation and practice on environmental reporting need to be much more robust.

If we continue to fail to monitor the decline in our biodiversity, the status of our critically threatened species, and the quality of our environment, we will find that they are gone. An effective voice for nature, which is Forest & Bird's mission statement, requires adequate information on which to speak out.

New Zealand has been slow, relative to other OECD countries, to report adequately and independently on the state of its environment. This was noted by both the OECD (in its 2007 environmental performance review of New Zealand), and the PCE in 2010 in her report *How clean is New Zealand? Measuring and reporting on the health of our environment*.

For all of these reasons, we support the environment reporting proposal. It is long overdue.

There are two legislative changes proposed in the discussion document:

1. An amendment to the Environment Act 1986, to require five-yearly state of the environment reports from the Parliamentary Commissioner for the Environment.
2. A proposal to improve inconsistent regional environment monitoring, by expanding Resource Management Act regulation-making powers.

No less important than a requirement to regularly report is the quality of information on which reports are based. We agree that these two are, therefore, complementary measures. There needs to be both regular independent reporting, and high quality fit for purpose statistics.

The new role of the Parliamentary Commissioner for the Environment

There have been questions about both the independence and the frequency of the Ministry for the Environment's state of the environment reporting. We support the choice of the PCE, as the best among the available options, for a new reporting function. We think that this is consistent with the approach of most other OECD countries, to make environment reporting a robustly independent function. It fits with the existing audit functions of that office; and the environmental expertise within or available to the PCE.

However, this is subject to issues about adequate funding being addressed, to ensure that the other crucial functions of the PCE are not compromised. We note that the PCE herself in her submission has raised this concern.

The discussion document proposes that the PCE would report on, but not be limited to, a specified set of domains: freshwater, land, oceans, air, and biodiversity. We do not consider that this approach compromises her independence, but note that she has taken a different view.

We note that 5-yearly environmental reporting is said, in the document, to be based on international and regional best practice in state of the environment reporting. The proposal is definitely an improvement on past practice. Whether more frequent reporting would be cost-effective and desirable can perhaps be considered at some future time.

Regulations under the Resource Management Act

The proposal is to improve the quality of information on which good environmental reporting relies, by requiring local authorities to measure a standard set of things in a standard way. Regulations would be developed under the Resource Management Act.

There are limitations on what is proposed for improving the consistency of environmental statistics. The focus is all on statistics generated by local authorities under the RMA. The proposal will not address environmental statistics collected outside of the RMA.

We note that no less important than standardisation is getting the right measures. On freshwater, for example, there has been some criticism of the current measures. There is also some possible risk of inconsistency between what the Minister requires by way of regulation, and what the PCE can or wishes to use in the performance of her functions.

We therefore welcome the proposal to further consult on the regulations. Over time, as the PCE develops her methodology, steps could be taken to improve the quality of any other statistics that are needed to support this function.

Cost benefit analysis

In our view, while the new monitoring and reporting requirements may incur some costs, these would be clearly offset and outweighed by tangible and intangible economic and environmental benefits for New Zealand of better environmental reporting.

Conservation Advocate