

Otago Fish and Game Council
PO Box 76
Dunedin

17/10/2011

Dear Sir / Madam

Re: Environmental Reporting Bill

Introduction

This submission is a joint submission on behalf of the Otago and Southland Fish and Game Councils on the proposed Environmental Reporting Bill. Fish and Game Councils are independent regional statutory bodies set up under section 26P of the Conservation Act 1987 to manage New Zealand’s sport fish and gamebird resources and habitats. We are New Zealand’s leading advocate for better protection and management of our freshwater resources, on behalf of our approximately 75,000 sports fishing and game bird hunting license holders per year.

You may also receive a submission from the New Zealand Fish and Game Council which should be considered separately, as this will cover nationwide issues.

In response to the questions in the discussion document

1. We agree with the issues raised in the discussion document regarding the lack of consistency in environmental reporting in New Zealand. Our organisations rely on quality data from District and especially Regional Councils related to water quantity and quality, and we have been hampered in the past due to a lack of long-run data. As land use continues to intensify, the need for data will similarly increase.

Are there any other issues that have not been considered?

2. The discussion document covers off on the issues associated with environmental reporting well.

What is the scale of the problem? Which is the bigger issue: the lack of statutory obligation requiring regular independent state of the environment reporting or inconsistent state of the environment monitoring?

3. Fish and Game believes that the problem is both regional and nationwide in scope, and that the problem can only increase as more pressure incurs on our environment, particularly in the area of freshwater quality. The biggest problem is the lack of statutory obligation on reporting.

The discussion document and proposed Environmental Reporting Bill appears to address this concern by making reporting a mandatory requirement under the Resource Management Act. However, there is no discussion as yet as to what those regulations (under s360 of the RMA) would impose on Councils. Fish and Game believes that a similar official system to Statistics New Zealand's system of National Environmental Accounts would be appropriate.

Also, a penalty regime may be needed for Councils that fail to comply with the reporting regulations, in a similar way that late processed resource consents now receive a discount. In our experience the threat of a financial penalty for underperformance seems to motivate Councils more than anything else.

Do you agree with these objectives? Please give reasons.

4. We support the objectives of the proposed Environmental Reporting Bill as stated. The roles and obligations of people and organisations tasked with reporting responsibilities require clarity, and the final government agency which is tasked with formulating the report needs statutory independence. The Office of the Parliamentary Commissioner for the Environment appears to be the logical place for this work to take place, provided that adequate extra staffing is provided.

One further objective we would add is around long term data storage. An objective to maintain a database of national environmental records needs to be included, as otherwise information risks being lost due to restructuring and other political changes in Wellington. The management regimes for databases used by Crown Research Institutes who maintain datasets of national importance (e.g. NIWA, Landcare Research etc) would provide a good example.

Do you agree with the assessment criteria? Please give reasons.

5. These assessment criteria will provide appropriate direction for the new environmental reporting responsibilities.

Do you agree with the preferred options? Please give reasons.

6. The preferred option that the Fish and Game Councils support is to:

- Amend the Environment Act 1986 to require the Parliamentary Commissioner for the Environment to undertake nationwide State of the Environment reporting every five years.
- Expand the regulation making powers under s360 of the Resource Management Act 1991 to allow for regulations requiring statistics to be made, and then promulgate suitable regulations.

Is there an alternative option that has not been considered?

7. This discussion document appears to have undertaken a good consideration of alternatives, and we cannot think of any further alternatives that are practical.

Is five-yearly reporting an appropriate reporting timeframe? If not, what time period would you recommend?

8. The current 10 years is far too long a timeframe for nationwide environmental reporting. Undertaking the work every 5 years will enable a better response to emerging trends. If possible, it would be good to see the PCE produce limited reports on issues on a yearly timeframe, particularly for hot topic issues such as water quality, and where the data would be easy to analyse.

What do you think about the proposed environmental domains that the Parliamentary Commissioner for the Environment should report on in the state of the environment report? What topic areas or requirements (if any) would you suggest?

9. Naturally, Fish and Game supports the inclusion of water quality as a main environmental domain to be reported on. Land use should be a component of this analysis.

Outline any problems you perceive with the proposed RMA amendment?

10. We have no issue with the proposed RMA amendment, short of the Ministry and politicians needing to be aware of Councils opposing it on (claimed) cost grounds. A communications strategy needs to be prepared to deal with this if it arises.

Which environmental domains (eg, fresh water, land, oceans) do you think should be prioritised for improvements in consistency?

11. Freshwater and land are the biggest areas that should be prioritised, as this is the biggest contributor to current environmental pollution.