

Submission on *Measuring Up: Environmental Reporting – A Discussion Document*

1. Do you agree with the issues identified above? Have the main issues been defined accurately?

Yes I agree with the issues identified and in the main they have been defined accurately, although it would be worth pointing out that the issues are far more detailed than is set out in this discussion document. Also I think it is important to highlight that a National Policy is not going to be a silver bullet that will fix the problem on its own. It will take many years to implement changes, lots of money and technical support and the value in many of these data sets is in their length of record. It is important that any changes made take this into account so the value of previous monitoring is not lost and so that is it not another five to ten years before useful data is obtained.

Air quality is a good example of this. At the start of page 14 in the discussion document air quality is used as an example. Is air quality really the most common variable monitored by regional councils? Based on the data on the Ministry website two councils do not currently carry out air monitoring (Taranaki and Gisborne), however, all councils carry out water quality monitoring. Although the NES for air quality is likely to have had some positive effect in terms of this monitoring, I do not think it is the main driver in the current amount of air monitoring. The majority of the councils were doing air quality monitoring prior to the NES being gazetted and even with the NES being in place for 6 years, it appears that there are still two regions doing no air monitoring.

Where the document is discussing lack of statutory obligation to require reporting is this referring to national level reporting only? I am assuming it is only referring to national-level reporting and if this is the case I think it needs to be more explicit – for example, make it clear in the ex-summary issue 1, sub- title on pg 12 and the objectives etc.

Also as discussed further below under question 4, I do not see the independence of the reporting as a critical issue.

Although “regular” reporting is important, I think frequency is more important. A national report on its own every 5 years is not frequent enough. Many stakeholders require more up-to-date information than this. This was one of the major feedbacks received on the 2007 state of the environment report.

2. Are there any other issues that have not been considered?
Cost! This would be the main driver of all monitoring and reporting. Everything at the end of the day comes down to budgets, funding, resources etc.
3. 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?

The scale of the problem is huge, particularly for the second issue (inconsistent monitoring). The second issue is the bigger issue and the success of solving the first issue is dependent on improving the second issue. Having a statutory obligation requiring reporting is useless unless there is quality data to base the reporting on.

4. Do you agree with these objectives? Please give reasons.

I agree with the first and third objectives but neither agree or disagree with the second objective. The second objective is the least important of the three objectives. I do not believe the independence of the reporting will have as greater effect on improving national environmental reporting as the other two objectives. If it is only "perceived" lack of independence then is it really important - can it be fixed by better transparency rather than shifting the reporting to an organisation independent of Government. Reporting should be done regularly, correctly and clearly with high quality data - if this is done with transparency (eg, underlying data available, clear methods etc) then who does the reporting does not matter.

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

Yes in the main. Although as discussed above, I do not see the independence as a critical issue, objective and therefore assessment criteria.

Also under cost efficient, as discussed above under question 1, any preferred option should retain as much of the current monitoring system as possible, to retain its value.

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

As above I do not see independence as critical, so do not believe that shifting reporting from MfE is going to achieve the greatest gains.

Also why are the five options considered for "regular and independent environmental reporting" only considering a national report every 5 years. All or some of the options should require more frequent reporting (in some form) than this. If the preferred option is for PCE to produce a report every five years, will they also produce interim statistics where needed or will MfE continue to do this through their reporting programme and if so should this not be required by legislation.

I agree with preferred option 2, however, it needs to clearly include data storage and management and quality assurance.

7. Is there an alternative option that has not been considered?

To require a university or CRI to carry out environmental reporting.

8. To what extent do the options address the identified problems?

I think the options address the "identified" problems.

9. Are you aware of any other costs and benefits of the options?

The preferred option 1 would have an increased cost associated it with as PCE are not currently staffed to carry out this role and if MfE were to continue collecting and analysing environmental information they would also need to retain staff to do this.

10. Do you have any comment about which option would deliver the highest level of net benefit?

Definitely preferred option 2. The costs of this will be huge and ongoing, however, the benefits will far outweigh the costs.

11. What are the pros and cons of the proposed Environment Act amendment?

Cons - there would potentially be some duplication of work by PCE and MfE and there would need to be more staff overall working in this area.

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

I think five yearly is appropriate for a large national report such as the 1997 and 2007 reports, however, it is vital that interim national reporting is carried out in-between these reports and this reporting also needs to be clearly required by legalisation and clearly sit with one organisation. It does not necessarily have to be the same organisation as the 5 yearly report. I think for most environmental statistics annual is suitable and needed. With the technology in today's society and

especially if the second issue in the document was addressed then there is no reason why this is not possible.

13. 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?

Look fine – although would atmosphere be incorporated into air?

14. Outline any problems you perceive with the proposed RMA amendment?

The scale of the problem is huge (and should not be underestimated) and the impact of making this change will be huge (and this should not be underestimated either). It will take several years for councils to phase in changes ie, some have long term contracts with laboratories that will not be easily terminated.

All the areas highlighted as being specified under the reg are to do with monitoring but it is much more than this. For example, it is laboratory testing (right down to detection limits on tests), QA/QC of fieldwork (monitoring), lab testing and data entry, data storage.

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

Freshwater is where councils do the most monitoring and therefore is probably where the most problems are but also could look at requiring councils to monitor other domains which many of them don't currently monitor or monitor much eg biodiversity, land.

16. Have we accurately reflected the high level costs and benefits arising from the proposals for an Environmental Reporting Bill? Please give reasons.

Very little information provided here – so can't really comment

17. Can you identify any other high level costs and benefits?

18. Do you have any information you would like to see included in the final cost-benefit analysis that will be carried out after the submissions are received and analysed?

Written submissions on the proposed Environmental Reporting Bill are due by **5pm on 18 October 2011**.

Send your submission to:

Submission on proposed Environmental Reporting Bill

Ministry for the Environment

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