

Measuring Up: Environmental Reporting – A Discussion Document

Submission from:

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

Yes. The way in which the 2007 national SoE report was perceived irretrievably damaged the credibility of this report as an independent assessment of our environmental quality. A more credible alternative is now needed, and the need for good, reliable, consistent data for use in such a report is critical.

Are there any other issues that have not been considered?

Availability of regional council and other environmental monitoring data is an issue. Data locked away in databases is of limited use in maintaining environmental quality through a better **understanding** of environmental processes. It should be made readily accessible for use in research, and in wider monitoring and assessment programmes.

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 two issues are linked, so hard to say. The most immediate issue is to ensure data quality and consistency, without which SoE reporting is flawed, regardless of who undertakes report compilation.

Do you agree with these objectives? Please give reasons.

Yes – they will enable the issues to be addressed.

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

Yes – cost efficiency should include minimising duplication of effort or data.

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

Yes – though unclear what the squiggle denotes (partially addressed?)

Is there an alternative option that has not been considered?

To what extent do the options address the identified problems?

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

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

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

Pros are as stated. Cons could include some duplication/overlap of duties between Ministry, PCE and EPA. A clear mandate should be provided to avoid this.

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

Although most environmental trends are unlikely to show up over a 5 year time frame, reporting in this time frame is still valid. It takes time to formulate and implement a response, and a 5 year head start (over the 10 yr option) is worth having.

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?

The domains are appropriate for inclusion. "Coastal waters" rather than "oceans" would be more appropriate. Ocean or sea level/quality is unlikely to change perceptively in the timeframes envisaged here.

What about atmospheric conditions, as they pertain to climate change and UV radiation?

Outline any problems you perceive with the proposed RMA amendment?

Risk of duplication of effort between MfE, EPA and PCE (as noted above).

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

There is a clear and present need for improvement in freshwater data quality and accessibility, and in achieving consistency between regions. Land quality is clearly strongly linked to that of freshwater, and I would view both as a more immediate national priority than, for example, "oceans or "air". The latter is largely a local, rather than national, issue.

Biodiversity is immensely important to New Zealand ... but I am not qualified to comment on how data consistency with help with the critical loss of biodiversity we are experiencing.

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

Can you identify any other high level costs and benefits?

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?

The benefits are adequately represented here. I believe the cost to be also, but without knowing details of the current arrangements between the various agencies, feel less qualified to comment

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
PO Box 10362 Wellington 6143 New Zealand

or to _____