



**THE PACIFIC INSTITUTE OF RESOURCE  
MANAGEMENT, Publishers of Pacific Ecologist**

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Submission on proposed Environmental Reporting Bill  
Ministry for the Environment  
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The Pacific Institute of Resource Management is a long-established organisation with broad interests in the relationships between human societies and the natural world. It publishes the occasional journal "Pacific Ecologist" and has been a frequent submitter to Ministries and Select Committees on a range of issues.

The Institute **strongly supports** the development of the Environmental Reporting Bill and broadly supports the proposed structure for that Bill. We have registered our interest to participate in the symposium planned for February 2012.

A statutory obligation for regular State of the Environment reporting appears to be required to ensure that such reports are produced on a regular basis and to bring NZ practice into line with that of our OECD colleagues. The collection of environmental data using consistent sampling practices and methodologies appears necessary if the statistics to be aggregated for preparation of the report are to have relevance.

Responding to the Questions that are asked in the discussion document:

- 1) The main issues appear to have been identified and defined.
- 2) The issue of air quality monitoring is mentioned as being reported consistently by regional councils probably because there is a requirement for such monitoring under a National Environmental Standard (NES). This begs the question of why the development of further NESs and National Policy Statements under the Resource Management Act (RMA) could not serve to cover a broader range of environmental indicators. The development of these Standards and Statements, originally envisaged as an integral and essential element for the effective functioning of the RMA, has been inadequately implemented by successive governments. The development of a full suite of Standards and Statements remains a priority and should serve the needs of environmental reporting without requiring amendments to existing Acts.
- 3) The problem is large. The absence of a consistent data set and critical analysis of the reported parameters severely handicaps decision-making and planning in many fields. The two issues are of equal importance.
- 4) There are some misgivings that if state of the environment reporting is explicitly independent of government there will be greater potential for the findings to be ignored by government. There is limited evidence that reports by the Parliamentary Commissioner for the Environment (PCE) have been seriously responded to by governments in the past. In the devolved system of responsibility that exists in New Zealand, there is potential for PCE reports to be seen as a mere commentary requiring little or no direct response from ministries or other elements of government.
- 5) Generally agree with assessment criteria with reservations around the interaction of independence and responsibility as outlined above. The "perception of independence" matter raises very broad questions about the function of government.
- 6) As below

- 7) The alternative would be to require the PCE to produce a regular report while ensuring that information of adequate quality is available could be ensured by the use of National Policy Statements and National Environmental Standards.
- 8) 9) 10) and 11) See above
- 12) Five years is adequate
- 13) The topics are for the PCE to determine as an independent entity.
- 14) Unnecessary, as outlined above with NPS/NES use.
- 15) Prioritisation is difficult if not impossible as critical issues arise within each field. As many as practicable should be advanced together.
- 16) Yes
- 17) No
- 18) Consideration of the costs and benefits of the alternative proposed.

Thank you for the opportunity to make this submission,

Yours sincerely,