



**Otago Regional Council Submission
on the
Measuring Up Environmental Reporting
Discussion Document**

This is a submission to the Ministry for the Environment on the Measuring Up, Environmental Reporting Discussion Document.

The Otago Regional Council wishes to be heard in support of this submission. If others make a similar submission, the Otago Regional Council would not consider presenting a joint case with them at a hearing.

Signature of submitter (or person authorised to sign on behalf of submitter):

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18 October 2011

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Executive Summary

The Otago Regional Council (ORC) submission relates only to those aspects of the proposal which impact on its statutory functions under the Resource Management Act 1991 (RMA).

ORC undertakes monitoring to enable description of effects of activities on resources such as water and air. This monitoring drives definition of resource condition and trends, and informs targeted consideration of policy development.

ORC is concerned that if additional monitoring is to be undertaken, which is not required for managing regional issues, those extra costs should be met by another party.

Introduction

ORC's monitoring and reporting programme (State of Environment Monitoring – SoE monitoring) focuses on water quality, water quantity and air quality. ORC's water quality monitoring covers a broad spectrum of sites, from pristine upland lakes and rivers (e.g. Lake Wakatipu and key tributaries) to developed lowland rivers (e.g. Pomahaka River). At all sites ORC uses consistent variables and methodologies to allow for effective reporting and analysis of resource condition and any short-term or long-term trends.

Not only does ORC undertake regular SoE monitoring and reporting, it also conducts more intensive, targeted monitoring to investigate potential adverse effects (e.g. Pomahaka, Manuherikia, and Taieri catchments).

The same principles apply to monitoring air quality with long-term monitoring carried out in specific airsheds backed up with targeted spatial air quality investigations and reporting.

As such, ORC's monitoring regime is robust, effective, and risk based. Thus the region does not require additional environmental monitoring to fulfil its statutory and environmental responsibilities.

ORC's concerns on the Government proposal arise from the likelihood that it will be required to collect resource data beyond what is currently required by Council to competently fulfil its statutory functions, including SoE reporting.

ORC's regional monitoring programme is a combination of SoE reporting needs, managing environmental effects and gathering information to manage specific issues. Expanding monitoring into locations beyond these, or monitoring variables that provide no further relevant information for Council's functions is not a justified action or valid ratepayer cost for Otago.

ORC understands the benefits of compatible and consistent data in order to competently compare and interpret monitoring results; however, Otago ratepayers should not have to pay when there is negligible regional management benefit.

ORC's monitoring focuses on water quality, quantity and air. In Otago:

- Water quality is monitored using TN, TP, NNN, DRP, NH₄, suspended solids, turbidity and E Coli.
- Water quantity: river flows are monitored at numerous sites throughout the region to allow for management of minimum flows and flood warning; groundwater is monitored using water level.
- Stream environmental health is monitored by measurement of macro-invertebrate indices, algal monitoring and fisheries monitoring.
- Air quality using PM₁₀ is monitored throughout the region (in accordance with the Air Quality NES).

Full Submission

1. ORC's monitoring programme is a combination of: SoE reporting needs; managing environmental effects; gathering information to manage specific issues; and giving a description of the state of resources in Otago, particularly water and air.
2. ORC is concerned at the lack of detailed cost transfer analysis in the document. Any transfer of costs should not become a liability of regional councils.
3. Council is concerned that the proposal may place a large proportion of the responsibility for the cost of national monitoring on regional councils.
4. ORC ratepayers pay for its current resource monitoring programme to manage Otago resources. Further monitoring in order to obtain information required nationally will result in increased regional monitoring activity with minimal regional benefit; costs which Otago ratepayers should not bear.
5. Monitoring needs to be cost effective, in particular regarding what, where, how and when it is undertaken, and in regard to a management / planning / assurance context.
6. The monitoring presently undertaken is used by Council to provide public SoE reporting, along with analysis of plan implementation and effectiveness. Specific monitoring is undertaken in response to local issues and identified potential risks.

Conclusion

In summary, ORC submits that:

- A If regional councils are required to monitor for any non-regional purpose, then associated costs should not be borne by the region, and
- B That the resource parameters measured should not exceed the minimal relevant set at each location, and
- C The locations of monitoring must remain risk and management based, and
- D The methods of monitoring and analysis should remain standardised only to the degree required for the results to be fit for regional management purposes in the monitored resource.