

b3



18 October 2011

Private Bag 11025
Manawatu Mail Centre
Palmerston North 4442

P 06 952 2800

F 06 952 2929

www.horizons.govt.nz

Submission on Proposed Environmental Reporting Bill
Ministry for the Environment
P O Box 10362
WELLINGTON 6143

Dear Sir or Madam

SUBMISSION ON PROPOSED ENVIRONMENTAL REPORTING BILL

Thank you for the opportunity to make a submission on the Proposed Environmental Reporting Bill.

Horizons is generally supportive of the government's goal to set out a framework for national State of the Environment reporting. We strongly support the notion of guidance around what constitutes best practice for the measurement of trends in environmental domains and methodologies for their analysis.

The following comments outline our concerns with some aspects of the proposal rather than addressing the questions asked within the *Measuring Up* discussion document, as overall we felt that there was insufficient detail within the document to be able to provide balanced answers.

Issue 2: Inconsistent regional State of the Environment monitoring programmes

Horizons acknowledges the difficulties arising from the current legislative regime with regard to the lack of requirement for local authorities to monitor the same aspects of the environment in a consistent way. However, it is important to recognise that those aspects of the environment will not always be the same across the country and it is appropriate for regions to be able to focus on those issues which are a priority within the local area. These will be reflected in, and flow through from, a local authority's environmental plans and policy statements.

Kairanga

Marton

Palmerston North

Taihape

Taumarunui

Wanganui

Woodville

For example, in the Horizons region air quality is a relatively minor issue in a few discrete parts of the region and therefore is of lower priority in terms of the resources allocated to it. This is reflected within our regional policy statement (RPS), with only limited air quality monitoring within the methods. In contrast, because of our strong focus on water quality, the RPS research, monitoring and reporting method is considerably more extensive. As a consequence, the parameters Horizons uses to monitor these environmental domains may differ from other councils. Some variability will therefore be an appropriate consequence.

Similarly, in the Manawatu-Whanganui region we have a strong need to understand the impact of point source discharges on water quality. This may not be the case for other regions which may, for example, need to concentrate their efforts on the impact of stormwater. It is vital that any national framework for monitoring be sufficiently flexible to accommodate the different priorities that will arise in different areas.

A further concern is that the discussion document does not acknowledge that there is already work being undertaken for the purpose of establishing agreed indicators for monitoring and methodologies for analysis by local authorities. There is considerable expertise within local government which has already contributed to the national understanding of best practice in State of the Environment monitoring, and which a great deal more could be learnt from during this review process.

Horizons has been and continues to work collaboratively with other local authorities, the Ministry for the Environment (MfE), the Parliamentary Commissioner for the Environment (PCE), Crown Research Institutes and universities on projects to advance best practice in this area. The progress that these projects have made must be acknowledged and incorporated into this review.

We draw to your attention the following specific projects as examples.

Horizons runs one of the three most extensive water quality monitoring networks in New Zealand. We have recently worked with other regional and unitary authorities to develop the water quality module for the Land and Water New Zealand website, which presents water quality information for 891 sites; this is in addition to the 77 sites in the National River Water Quality Network. As a result, information about water quality state and trends is presented in a unified way. The site also provides a platform for other initiatives, for example biodiversity. In summary, the project has already achieved a centralised 'home' for water quality data through the combined efforts of all regional and unitary authorities.

A specific project that Horizons is championing, involving the Biodiversity Forum working with Landcare Research, is the development of an Envirolink Tools Project to develop a nationally focused terrestrial biodiversity monitoring tool for regional councils. This project will include both an agreed set of indicators, methodologies and protocols for data capture and maintenance as well as an implementation plan to ensure its quick uptake. Similarly, the Local Authority Environmental Monitoring Group project is currently underway, to standardise water quality measurement protocols, in association with the MfE.

Where such work is already in development or has been completed with the collaboration of local authorities, it is vital that central government recognise its value and utilise it within any amendments to the national framework.

Costs associated with monitoring

Monitoring can be a significant cost for local government. Any alterations to government's monitoring requirements will impact on local authorities and their communities through the long term planning cycle. Government must recognise that any increased cost to communities arising from changes or increases in monitoring is likely to result in a reduction in the levels or numbers of services that a local authority can carry out with and on behalf of its communities. Appropriate funding mechanisms and capacity building for local authorities will need to be part of any changes to the current monitoring framework.

It is also important to acknowledge that some councils have made significant investment in their monitoring infrastructure and programmes, and consider how this existing investment can be taken advantage of as the national framework is reviewed.

A potential cost of another sort that can arise when monitoring frameworks are changed. In particular, information about trends can be lost if a parameter that has been monitored for a long period of time is changed or disestablished. Long-term monitoring adds to our knowledge each year, so changes to parameters results in a loss of cumulative information. An example of this occurred during the late 1990s when the parameter for bacterial contamination was changed from enterococci to E. coli.

Allocation of responsibility for collecting data

The *Measuring up* discussion document acknowledges that currently there are various agencies collecting environmental monitoring data. It is unclear where responsibility for different monitoring tasks will lie within any revision of the framework.

It is also unclear how the preferred option will work in practice, with the PCE of the day determining which variables for each environmental domain and any emerging issues, independently from the regulatory framework, driven by the MfE, which will prescribe monitoring by local authorities. Unless there is some means for the PCE to influence monitoring requirements, it is difficult to see how she or he will be able to exercise the flexibility in reporting that this proposal seeks to achieve.

In summary, Horizons is already highly focused on, and leading, projects to deliver national consistency in environmental monitoring, including engaging and working with other local authorities, MfE, the PCE, Crown Research Institutes and universities. We see the value in the development best practice guidance for a national environmental monitoring framework, provided such a framework recognises that some variability to cater for local conditions is both appropriate and desirable. We are concerned that existing or developing progress in this area must be recognised and incorporated into any new environmental reporting model, particularly where local authorities are already collaborating to devise agreed standards and protocols. Uncertainty around where responsibility for different monitoring tasks will lie and how the PCE will ensure data is collected to support changing environmental reporting priorities will need to be resolved.

We look forward to taking part in future opportunities to discuss and contribute to the development of a national environmental reporting framework.

Yours sincerely

REGIONAL PLANNING AND REGULATORY