

**SUBMISSION TO THE MINISTRY FOR THE ENVIRONMENT ON
"MEASURING UP: ENVIRONMENTAL REPORTING – A DISCUSSION
DOCUMENT (AUGUST 2011)"**

TO: Submission on proposed Environmental Reporting Bill
Ministry for the Environment
PO Box 10362
Wellington 6143
New Zealand

FROM: Solid Energy (New Zealand) Limited
15 Show Place
PO Box 1303
Christchurch

Introduction

1. Solid Energy is a state owned enterprise. It develops and supplies natural resource-based products and services in New Zealand and internationally. This includes:
 - a. The development, production, processing and marketing of:
 - i. Coal and lignites, including derived products;
 - ii. Biomass, including wood pellets and biofuels;
 - iii. Gas and syngas from coal and biomass;
 - iv. Other natural resources that utilise our capabilities to provide future options and value.
 - b. The conversion of coal, biomass and other natural resources to value-added products including electricity, solid fuels, transport fuels and chemical products.

Submission

2. Solid Energy (New Zealand) Limited ("Solid Energy") has read and considered Straterra Inc's ("Straterra") submission to the Ministry for the Environment on

"*Measuring Up: Environmental Reporting – A Discussion Document (August 2011)*". Solid Energy agrees with Straterra's recommendations and Straterra's reasoning for those recommendations. Solid Energy therefore respectfully adopts Straterra's recommendations at paragraph 10 of Straterra's submission as its own and recommends that the Government:

- a. Pursue its proposal to develop with public input an Environmental Reporting Bill, not least to enable New Zealand to justify our brand, and provide a transparent and credible measure of status and progress across a range of criteria;
 - b. Discard the proposal to have the Parliamentary Commissioner for the Environment responsible for national, independent environmental reporting; and
 - c. Assign the environmental reporting responsibility instead to Statistics New Zealand, as the appropriate and logical agency in New Zealand to carry out this responsibility, either resourced in house, or let out to contract.
3. In conclusion, although Solid Energy agrees that New Zealand needs independent and nationally consistent reporting on the state of our environment and in principle supports the proposal for an Environmental Reporting Bill, Solid Energy submits that Statistics New Zealand is the appropriate body to undertake this environmental reporting not the Parliamentary Commissioner for the Environment.

DATED this 18th day of October 2011

Counsel for Solid Energy (New Zealand) Limited

ANDERSONLLOYD
LAWYERS