

SUBMISSION ON Proposed Environmental Reporting Bill

<i>Date</i>	18/10/11
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Irrigation NZ)

Overview

IrrigationNZ (INZ) is a national body that promotes excellence in irrigation throughout New Zealand (NZ). INZ is a national organisation that represents the interests of over 3,600 irrigators totaling approximately 56% of NZ's irrigated area. All the key irrigation service providers (over 130 service companies including suppliers, designers, installers and consultants) are also members.

SUBMISSION

1. It should be made clear in the objectives of the Environmental Reporting Bill that its purpose is not only for environmental policy-making, its outputs should also be targeted so as they greatly contribute towards economic and social policy making.
2. It is important to recognise New Zealand is a country of diverse environments – from the sub-tropics of the north to the temperate environments of the south, and from the semi-arid environments of the east to the rainforests of the west. A consistent set of national indicators, while desirable, will therefore be difficult and likely impractical to achieve across all regions. The Bill should recognise this.
3. There is considerable cost to rate payers if a set of national indicators is forced upon regional councils regardless. Whilst INZ agrees there is a need for a nationally consistent data set, it is also important that indicators are relevant to the region undertaking the monitoring. There is no value in 'collecting data for data's sake' – the data has to have clear and demonstrable value to the rate payer. The Bill must therefore incorporate a degree of flexibility. The applicability of each indicator should be independently assessed for each region and applied accordingly. INZ understands that other OECD countries have national indicators that are not 'all encompassing'.

4. INZ strongly agrees there is a clear need for standardisation of data collection methodologies, including spatial and temporal factors, to ensure a consistent approach to national environmental statistics. This is essential to ensure a robust data set and also help with the independence perception (see 5 & 7).
5. INZ strongly agrees there is a need for regular 5-yearly national reporting.
6. The assessment criteria should be prioritised (weighted). For example throughout the document it is frequently stated there is a greater need for independence than is achieved through the status quo scenario. If the standardisation of methodologies, including spatial and temporal factors, is enforced, this will help overcome the perception issue. Transparent trend reporting upon robust data sets leaves little scope for report capture by vested interests and thus the independence issues are minimised. INZ therefore questions the equal weighting given to this factor in the assessment?
7. INZ is concerned that the preferred PCE pathway will create a duplication of effort by separate agencies, which ultimately creates additional cost to the tax payer. The independence issue is overcome by robust and transparent data sets. INZ therefore questions the need for the PCE to undertake the reporting role when the Ministry holds the data sets and the relevant expertise to competently and independently perform such a task? If the PCE is to perform this role an explanation of how the duplication of effort will be minimised, needs to be made available.
8. INZ agrees with the preferred approach to ensure consistency of monitoring.
9. The exact variables reported within the environmental domains need to be identified and consistent from one reporting period to the next, and not determined by the PCE of the day. Emerging issues should however, be able to be included.
10. An issue not covered by the discussion document is the considerable cost imposed upon those regional councils and unitary authorities with limited resources. Such council's also have capability and capacity issues, to both set up and undertake comprehensive environmental monitoring programmes. Also many of the more affluent council's already undertake a high standard of consistent monitoring as they have the funding and resources. They will therefore be relatively unaffected by the introduction of the Bill. The council 'equity' issue must be addressed prior to the introduction of the Bill.

INZ Submission Ends