

Office of Hon Amy Adams

Member of Parliament for Selwyn

Minister for the Environment

Minister for Communications and Information Technology

Associate Minister for Canterbury Earthquake Recovery

12 DEC 2012

12-O-01720

Alex Harris
fyi-request-641-9c1a225d@requests.fyi.org.nz

Dear Alex Harris

Thank you for your email of 29 October 2012 requesting, under the Official Information Act 1982 (OIA):

[In relation to the public consultations on environmental reporting]
'All documents relating to the consultation, including summaries of submissions, discussions documents, Ministerial briefings, and (if any) final recommendations. And all submissions received.'

The attached table lists the documents falling within the scope of your request and any OIA provisions being applied. Links to publicly available documents are provided.

Following the consultation in 2011, I am considering how best to ensure that environmental reporting is credible, balanced and provides an integrated picture of the economy and the environment.

The Ministry for the Environment will continue to produce regular updates of the individual environmental indicators reports. Indicator updates ensure that key environmental indicators are reported using quality data in a timely, efficient manner and at intervals relevant for the indicator.

In 2012 the Ministry released six indicator updates:

- Air quality (particulate matter PM10)
- Stratospheric ozone
- Recreational water quality in New Zealand
- Household consumption expenditure
- Solid waste disposal
- Greenhouse gases (emissions and removals)

Under section (28)(3) of the OIA, you have the right to ask the Ombudsman to review my response to your request.

Yours sincerely

Hon Amy Adams
Minister for the Environment

Documents falling within the scope of your request

No.	Date	Content	Decision	OIA Section/s (if withholding)	Info
1	7-Sep-11	'The proposed Environmental Reporting Bill' presentation to Regional Council steering group	Release in full		
2	7-Nov-11	Speech: Association of Chartered Certified Accountants Sustainability Reporting Awards	Release in full		
3	16-Nov-11	'The proposed Environmental Reporting Bill' presentation to ACOS	Release in full		
4	Unknown	Environmental Reporting Q and A's	Release in full		
5	14-Nov-11	Status Report	Release all in scope information		
6	20-Mar-12	Spreadsheet: Summary and analysis of Environmental Reporting Bill Submissions	Release in part	s9(2)(a) to protect the privacy of natural persons	
7	Apr-12	'Possible changes to national level environment reporting' NZPI Conference Update	Release all in scope material		
8	30 March 2012	Resource Managers Group Meeting, 30 March 2012	Release all in scope information		
9	3-Jun-10	SPEECH Dr Smith EDS 2010	Refused	s18(d) The information is publicly available	http://www.beehive.govt.nz/speech/next-steps-bluegreen-agenda
10	4-Aug-11	Cabinet Paper: Release of discussion document: proposed environmental reporting bill	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/publications/ser/measuring-up-environmental-reporting/cabinet-paper-11co1298-environmental-reporting-bill.pdf
11	4-Aug-11	Cabinet Minute: Release of discussion document: proposed environmental reporting bill	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/publications/ser/measuring-up-environmental-reporting/cabinet-minute-environmental-reporting-bill.pdf
12	11-Aug-11	"Measuring Up" - Speech on 25th Anniversary of Parliamentary Commissioner for the Environment	Refused	s18(d) The information is publicly available	http://www.beehive.govt.nz/speech/quotmeasuring-upquot-speech-25th-anniversary-parliamentary-commissioner-environment-0
13	13-Sep-11	Submission: Grey District Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
14	13-Sep-11	Submission: Christchurch Botanic Gardens	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
15	13-Sep-11	Submission: Name confidential	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/

No.	Date	Content	Decision	OIA Section/s (if withholding)	Info
16	29-Sep-11	Submission: Parliamentary Commissioner for the Environment	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
17	Oct-11	Submission: Glass Packaging Forum Inc.	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
18	Oct-11	Submission: Water New Zealand	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
19	Oct-11	Submission: Northland Regional Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
20	1-Oct-11	Submission: Selwyn DC	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
21	7-Oct-11	Submission: Whangarei District Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
22	11-Oct-11	Submission: Waitaki District Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
23	11-Oct-11	Submission: Mid Dome Wilding Trees Charitable Trust	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
24	12-Oct-11	Submission: Te Arawa River Iwi Trust	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
25	13-Oct-11	Submission: Environment Canterbury Regional Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
26	14-Oct-11	Submission: Taranaki Regional Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
27	14-Oct-11	Submission: Name confidential	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
28	14-Oct-11	Submission: Far North District Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
29	14-Oct-11	Submission: Palmerston North CC	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
30	17-Oct-11	Submission: Otago Fish and Game Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
31	17-Oct-11	Submission: New Zealand Hydrological Society	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
32	17-Oct-11	Submission: West Coast Regional Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
33	17-Oct-11	Submission: New Zealand Historical Places Trust	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/

No.	Date	Content	Decision	OIA Section/s (if withholding)	Info
34	17-Oct-11	Submission: New Zealand Ecological Society	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
35	17-Oct-11	Submission: Bay of Plenty Regional Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
36	17-Oct-11	Submission: Scion	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
37	17-Oct-11	Submission: Royal Forest and Bird Protection Society of New Zealand Incorporated	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
38	17-Oct-11	Submission: Marlborough DC	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
39	18-Oct-11	Submission: Ministry of Health	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
40	18-Oct-11	Submission: Business NZ	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
41	18-Oct-11	Submission: Greater Wellington Regional Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
42	18-Oct-11	Submission: Horizons Regional Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
43	18-Oct-11	Submission: Seafood Industry Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
44	18-Oct-11	Submission: IPENZ	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
45	18-Oct-11	Submission: Federated Farmers of New Zealand	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
46	18-Oct-11	Submission: New Zealand Fertiliser Manufacturers' Research Association Incorporated	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
47	18-Oct-11	Submission: Grant Thornton New Zealand	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
48	18-Oct-11	Submission: Waikato Raupatu River Trust	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/

No.	Date	Content	Decision	OIA Section/s (if withholding)	Info
49	18-Oct-11	Submission: Irrigation New Zealand Incorporated	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
50	18-Oct-11	Submission: Landcare Research	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
51	18-Oct-11	Submission: Name confidential	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
52	18-Oct-11	Submission: Solid Energy (New Zealand) Limited	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
53	18-Oct-11	Submission: New Zealand Institute of Forestry	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
54	18-Oct-11	Submission: Meridian Energy Limited	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
55	18-Oct-11	Submission: Otago Regional Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
56	18-Oct-11	Submission: The Royal Society of New Zealand	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
57	18-Oct-11	Submission: Roothing New Zealand	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
58	18-Oct-11	Submission: The Pacific Institute of Resource Management	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
59	18-Oct-11	Submission: TrustPower Limited	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
60	18-Oct-11	Submission: Sustainability Matters	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
61	18-Oct-11	Submission: Environmental Research Institute, University of Waikato	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
62	18-Oct-11	Submission: Forest Owners Association	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
63	18-Oct-11	Submission: Name confidential	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/

No.	Date	Content	Decision	OIA Section/s (if withholding)	Info
64	18-Oct-11	Submission: New Zealand Marine Sciences Society	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
65	18-Oct-11	Submission: Nelson City Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
66	18-Oct-11	Submission: Local Government New Zealand	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
67	18-Oct-11	Submission: Watercare Services	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
68	18-Oct-11	Submission: Science Support Service	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
69	18-Oct-11	Submission:	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
70	18-Oct-11	Submission: University of Canterbury	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
71	19-Oct-11	Submission: Auckland Council	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
72	19-Oct-11	Submission: Sustainable Future Inst.	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
73	28-Oct-11	Submission: Fish & Game	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
74	Dec-11	Summary of Submissions	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/summary-of-submissions.pdf
75	14-Oct	Submission: Gisborne DC	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
76	Undated	Submission:	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
77	Undated	Submission	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
78	Undated	Submission	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/

No.	Date	Content	Decision	OIA Section/s (if withholding)	Info
				available	
79	Undated	Submission: NIWA	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
80	Undated	Submission:	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
81	Undated	Submission: Waitaki Irrigators Collective Limited	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
82	Undated	Submission: New Zealand Freshwater Sciences Society	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
83	Undated	Submission: Straterra	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
84	Undated	Submission: Waterways Centre for Freshwater Management, Universities of Canterbury and Lincoln	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
85	Undated	Submission: TEC services	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
86	Undated	Submission: Environment Southland	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
87	Undated	Submission: Environmental Defence Society	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
88	Undated	Submission: Waikato RC	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
89	Undated	Submission: Southern DHB	Refused	s18(d) The information is publicly available	http://www.mfe.govt.nz/environmental-reporting/about/submissions/
90	30-Jun-11	FW Letter from PCE re meeting with Minister and Paul next week.msg	Withheld	s9 (2)(g)(i) The information is in the nature of free and frank expression of opinions and releasing it would affect the provision of similar advice in the future.	
91	19-Jan-12	12B00027 Combining ERB and RMII reportbacks	Withheld	s9(2)(f)(iv) and s9(2)(g)(i) To protect the	

No.	Date	Content	Decision	OIA Section/s (if withholding)	Info
				confidentiality of advice and to protect the ability for officials to provided free and frank advice	
92	Feb-12	Government's priorities 2012 – information required for response to the Prime Minister	Withheld	s9(2)(g)(i) The information is in the nature of free and frank expression of opinions and releasing it would affect the provision of similar advice in the future.	
93	Apr-12	12B00322 Direction on the detail of the proposed Environmental Reporting Bill	Withheld	s9(2)(f)(iv) and s9(2)(g)(i) To protect the confidentiality of advice and to protect the ability for officials to provided free and frank advice	
94	Apr-12	12B00322 Environmental Reporting Alternative Recommendations	Withheld	s9(2)(f)(iv) and s9(2)(g)(i) To protect the confidentiality of advice and to protect the ability for officials to provided free and frank advice	
95	5-Sep-12	12-B-01139 Environmental reporting – next steps	Withheld	s9(2)(f)(iv) and s9(2)(g)(i) To protect the confidentiality of advice and to protect the ability for officials to provided free and frank advice	
96	5-Sep-12	12B01139 Environmental Reporting appendix one	Withheld	s9(2)(f)(iv) and s9(2)(g)(i) To protect the confidentiality of advice and to protect the ability for officials to provided free and frank advice	

Proposal Part One – Amend Environment Act

- **Change:** Require the Parliamentary Commissioner for the Environment to produce five-yearly reports on the state of the environment
- **Result:**
 - Provides Parliament with independent assessment of the state of NZ's environment
 - Provides impartial oversight of the issues & long-term trends in NZ's environmental performance.
- NB: MfE continues its environmental statistics programme



5

Drivers for change

- Government's "Bluegreen" environmental agenda
- NZ one of a few OECD countries without legislation requiring regular national-level SOE reporting
- Lack of regular & independent national SOE reporting makes independent validation of clean, green brand difficult



Proposal Part Two – Amend the RMA

- **Change:** 1) expand regulation-making powers under s360. 2) Develop regulations eg, require local authorities to monitor certain variables with specified methodologies & monitoring sites
- **Result:** improve consistency of environmental statistics generated by local authorities under RMA (s35(2))
- NB: Excludes environmental information or statistics from other environment-related legislation (eg, the EPA Act), and/or from central government agencies, CRIs & universities.




7

Drivers for change

- Local authorities not required to:
 - supply standardised data for national SOE reporting
 - monitor the same indicators or aspects of the environment in a consistent way
- OECD's 2007 environmental performance review of NZ:
 - Consistent environmental indicators & trend data that can be aggregated at national level are scarce
 - Need standardised local data collection methods to assist data aggregation & reporting of key environmental indicators at national level


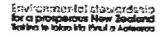




The proposed Environmental Reporting Bill



Julie Knauf
Acting Manager, Natural Systems Analysis
Ministry for the Environment

Presentation to Monitoring & Review Project Steering Group 7 September 2011



Main issues for national scale environmental reporting

- **Issue 1: Lack of statutory obligation** requiring regular & independent state of the environment (SOE) reporting
- **Issue 2: Inconsistent regional SOE monitoring programmes**


Objectives of Environmental Reporting Bill

- It is clear who's responsible for regular SOE reporting
- SOE reporting is independent of Government
- SOE reporting & environmental policy underpinned by high quality environmental statistics





The Bill will build on existing work

- Existing local government initiatives to improve consistency of environmental monitoring eg NEMS
- MfE & local government collaborative projects to improve the consistency of locally derived statistics, develop national monitoring networks etc



Source: Hamlin & Verburg 2010



4

Drivers for change

- Regional monitoring doesn't always meet national reporting & policy needs
- Inconsistencies in regional monitoring programmes can make it hard to produce a satisfactory national SOE picture
- This inhibits our ability to make robust decisions on environmental management



Potential scope of RMA changes

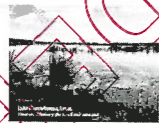
- It's early days but...
- Regulations could specify:
 - what should be monitored
 - where monitoring should be done
 - when monitoring should be done
 - how monitoring should be done
 - who should carry out the monitoring



10

Benefits

- Lower costs to compile national level data
- Higher quality, nationally representative statistics
- Better environmental management decisions & policies
- Improved information base for environmental research
- Improved accessibility, quality and transparency of environmental information
- Earlier detection of environmental problems so policies can be implemented earlier and more effectively



11

What could this mean for you?

- Any regulations are likely to impact regional councils' SOE monitoring programmes
- Size of the impact depends how well councils' current monitoring programmes match up with the requirements of any future regulations
- Costs of any new regulations can't be determined without more detailed scoping of the regulations
- High level cost-benefit assessment in discussion document. Full CBA to be undertaken if Bill is pursued



Get involved early

- **18 October:** Submissions on discussion document close
- **February 2012:** Symposium to discuss scope, impacts & implications of possible RMA regulations.
- This will inform our advice to the Government on introducing an Environmental Reporting Bill
- **March 2012:** MfE to report to Cabinet on summary of submissions, outcome of symposium discussions, recommendation on how to proceed.



What happens after that?

- If Cabinet agrees to introduce the Bill in March 2012 & expands the regulation-making powers of the RMA:
 - MfE begins substantive work programme to develop detail of the specific regulations (building on Symposium)
 - Once final regulations are prepared for Cabinet approval, normal legislative process will follow (incl. Select Committee process & public submissions)
- We want to work with you to help us scope any new regulations



14

Download the discussion document:
www.mfe.govt.nz/environmental-reporting/about/



Ministry for the
Environment
Manatū Mō Te Taiao

Environmental stewardship
for a prosperous New Zealand
Te kaitiaki o te taiao kia kōwhiri a Aotearoa

Email: julie.knauf@mfe.govt.nz

2

7 November, ACCA Sustainability Conference



Office of Hon Dr Nick Smith

Member of Parliament

Minister for the Environment

Minister for Climate Change Issues

Minister Responsible for ACC

12:15 pm Monday 7 November 2011

Association of Chartered Certified Accountants

Sustainability Reporting Awards

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OFFICIAL INFORMATION ACT

Environmental Reporting

- The Government shares your commitment to sound environmental reporting

- Historically we haven't been particularly robust in how we measure our environmental credentials
- NZ is only OECD country without legislative basis for state of the environment reporting
 - Government will change this
- The Minister for the Environment recently announced initiatives to improve on this

"Measuring Up" Discussion Document

- The Government plans to introduce an Environmental Reporting Act
- The proposal would expand the role of Parliamentary Commissioner for the Environment (PCE)
 - Would see the PCE undertake five yearly, State of the Environment reports
 - Covering water quality, air quality, coast and oceans management, waste and wellbeing of plants and animals
- Would also amend the RMA to ensure councils are nationally consistent in the way they monitor and report on environmental matters
- The Government has been consulting on these proposals through its discussion document "Measuring Up"
- Submissions on "Measuring Up" ended late last month
- Look forward to seeing the results of this and a Bill in the next parliament
- Rationale for changes are four fold
 - 1) Need to strengthen the integrity of our brand
 - Are currently poorly equipped to contest challenges to it
 - 2) The PCE undertaking the report ensures it is seen as independent of the Government
 - Not a PR exercise
 - 3) Current system has deficiencies
 - Environmental outcomes not currently monitored consistently across regional councils
 - 4) Part of a wider reform of institutions
 - Ministry for the Environment as robust and competent policy advisor
 - Environmental Protection Authority as arms length regulator

- PCE as strong independent auditor
- Parallel in financial sphere
 - Treasury, Reserve Bank and Controller and Auditor General
- Reform will provide first class and robust environmental system of governance

ENDS

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OFFICIAL INFORMATION ACT

The proposed Environmental Reporting Bill

Paul Reynolds
Ministry for the Environment

Advisory Committee on Official Statistics
16 November 2011

Ministry for the Environment
Manatū Mo Te Taiao

Environmental Partnership
for a prosperous New Zealand
Tikina te taiao kia tonu a Aotearoa

Submissions on the discussion document "Measuring up: Environmental Reporting – a discussion document" closed on 18 October 2011.

- The ACOS meeting attendees were provided a copy of the executive summary of this document before this meeting.

This presentation provides:

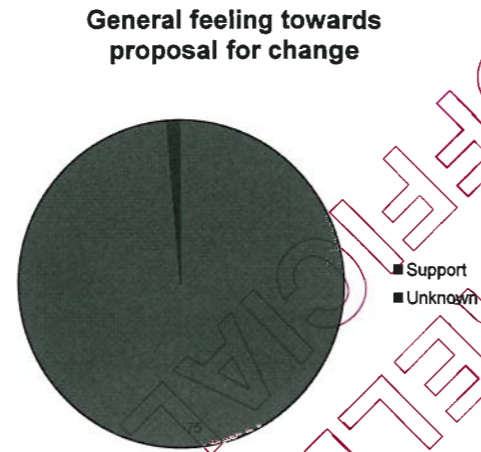
- An overview of the proposed Environmental Reporting Bill
- The main themes arising from the submissions on the discussion document

Note the submissions and a summary of the submissions will be published on the MfE website in December.

Until then, **please treat this material in confidence.**

Main issues for national scale environmental reporting

- **Issue 1: Lack of statutory obligation** requiring regular & independent state of the environment (SOE) reporting
- **Issue 2: Inconsistent regional SOE monitoring programmes**



2

The discussion document outlined two main issues:

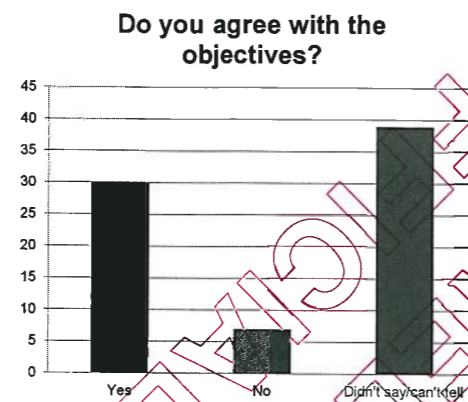
1. A lack of statutory obligation requiring regular and independent reporting
2. Inconsistent regional SOE monitoring programmes.

There was general support for government action in the environmental reporting space. However, submitters did not always support the preferred options that were identified in the discussion document.

The need for high quality data and statistics was emphasised, in particular the information needs to be high quality, fit for purpose and meaningful.

Objectives of Environmental Reporting Bill

- It is clear who's responsible for regular SOE reporting
- SOE reporting is independent of Government
- SOE reporting & environmental policy underpinned by high quality environmental statistics



3

Objectives:

- It is clear who's responsible for regular national SOE reporting
- National SOE reporting is independent of Government of the day
- SOE reporting & environmental policy underpinned by high quality environmental statistics

Benefits



- Lower costs to compile national level data
- Higher quality, nationally representative statistics
- Better environmental management decisions & policies
- Improved information base for environmental research
- Improved accessibility, quality and transparency of environmental information
- Earlier detection of environmental problems so policies can be implemented earlier and more effectively

Proposal Part One – Amend Environment Act

- **Change:** Require the Parliamentary Commissioner for the Environment to produce five-yearly reports on the state of the environment
- **Result:**
 - Provides Parliament with independent assessment of the state of NZ's environment
 - Provides impartial oversight of the issues & long-term trends in NZ's environmental performance.
- NB: MfE continues its environmental statistics programme



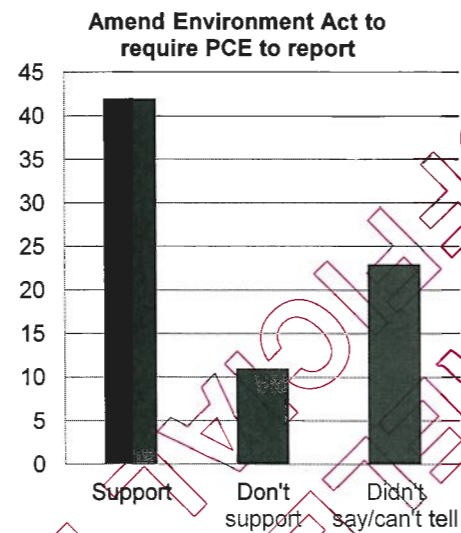
5

Drivers for change

- The option to require PCE to prepare an independent report every 5 years is identified in the National Party's Environment and Climate Change election policy
- Clearly stated in Government's "Bluegreen" environmental agenda and other related documents and speeches over the last few years (and beyond)
- Responding to International review findings: NZ one of a few OECD countries without legislation requiring regular national-level SOE reporting
- Lack of regular & independent national SOE reporting makes independent validation of clean, green brand difficult (one estimate of clean, green brand value to the NZ economy was around \$1 billion pa)

Proposal Part One – Amend Environment Act

- Consistent with PCE's role, but:
 - would need funding and resourcing
 - PCE needs capability and capacity
- Meets independence test
 - some suggest independence is not an issue
- 9% submitters (7 submissions) suggested Statistics NZ as an alternative



6

There was strong support for the legislation to be amended to require PCE to prepare a state of the environment report every 5 years. A range of points were discussed in submissions including:

- Recognising the function of environmental reporting is consistent with PCE's role as an environmental auditor and overseer.
- The PCE would need to be properly funded and resourced to ensure the other crucial functions of the PCE are not compromised or undermined.
- The capability and capacity for PCE to take on this reporting role would have to be built from scratch within her organisation (these skills already exist in other organisations).
- Agreeing this option would meet the independence test (although some submitters were concerned that the PCE is not neutral and is biased towards the environment). There were differing views over the need for independent state of the environment reporting. Some thought the report being produced independently was important, while some thought it would not be a problem for the Ministry for the Environment or another government department to produce the report (e.g. Statistics NZ). Additionally, a perceived lack of independence could be addressed through making the process more transparent.

A number of submitters (7 submitters or 9% of submissions) supported the option of having Statistics NZ prepare the state of the environment report every 5 years. It was felt this organisation already has the skills required to prepare this report. This option would also fit with the role of the Government Statistician as outlined in Part 1 of the Statistics Act 1975 (sections 3-11). By contrast, some submitters also felt Statistics NZ was not a suitable organisation to undertake this reporting because they do not have the necessary environmental expertise.

Proposal Part Two – Amend the RMA

- **Change: 1) expand regulation-making powers** under s360.
2) Develop regulations eg, require local authorities to monitor certain variables with specified methodologies & monitoring sites
- **Result:** improve consistency of environmental statistics generated by local authorities under RMA (s35(2))
- NB: Excludes environmental information or statistics from other environment-related legislation (eg, the EPA Act), and/or from central government agencies, CRIs & universities.



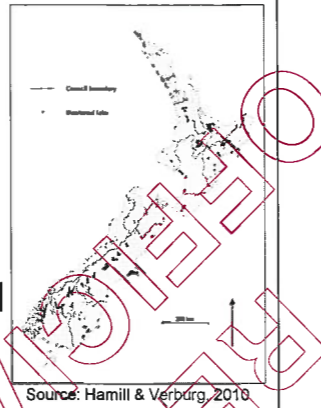
7

Drivers for change

- Currently legislation doesn't require local authorities to:
 - supply standardised data for national SOE reporting
 - monitor the same indicators or aspects of the environment in a consistent way
- OECD's 2007 environmental performance review of NZ found that:
 - Consistent environmental indicators & trend data that can be aggregated at national level are scarce
 - Need standardised local data collection methods to assist data aggregation & reporting of key environmental indicators at national level
- Recognise that what is needed for regional monitoring doesn't always meet national reporting & policy needs
- Inconsistencies between regional monitoring programmes can make it hard to produce a satisfactory national SOE picture
- This inhibits our ability to make robust decisions on environmental management

The Bill would build on existing work

- Existing local government initiatives to improve consistency of environmental monitoring eg NEMS
- MfE & local government collaborative projects to improve the consistency of locally derived statistics, develop national monitoring networks etc



8

Any regulations or legislation will build on existing work including:

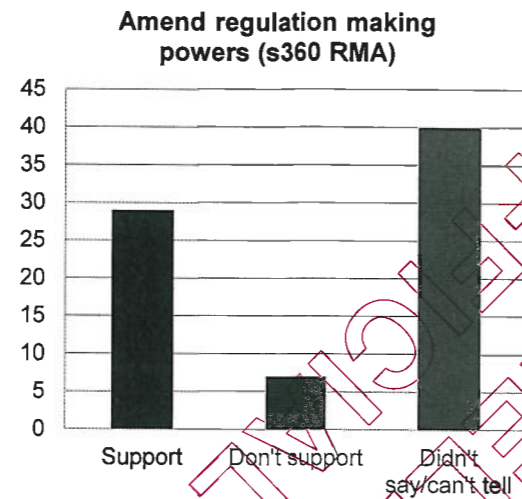
- local government initiatives aimed at improving the consistency of environmental monitoring (e.g. council-developed national environmental monitoring standards)

- MfE & local government collaborative projects aimed at improving the consistency of locally derived statistics, develop national monitoring networks (such as the National Environmental Monitoring and Reporting project to create a dependable freshwater monitoring network and a single indicator for reporting on the state of freshwater)

Proposal Part Two – Amend the RMA

Issues raised include:

- Who bears the cost?
- It's not just regional councils that collect data
- Any data collected should be made available to the public



9

Submitters commented on problems they perceive with the proposed RMA amendment, including the following:

•Who will bear the cost of collecting data for national environmental reporting? This cost should not be passed onto rate payers; instead central government should pay.

•Regional councils are not the only group that collects environmental data and data is also collected under other Acts including the Local Government Act, Land Transport Management Act and Biosecurity Act. The proposal should be extended to take a whole of system approach.

•All data collected should be made publically available under the "Declaration on open and transparent government" and "New Zealand data and information management principles".

•The existing regional monitoring frameworks may not be suitable for national purposes.

Next steps

- **December 2011:** Summary of submissions and submissions received to be made available
- **14 February 2012:** Symposium to discuss scope, impacts & implications of possible RMA regulations
 - This will inform our advice to the Government on seeking policy approval to introduce an Environmental Reporting Bill
- **March 2012:** MfE to report to Cabinet on summary of submissions, outcome of symposium discussions, recommendation on how to proceed



10

If Cabinet agrees to policy proposal in March 2012:

- MfE begins substantive work programme to develop detail of the specific regulations (building on Symposium)
- Once final regulations are prepared for Cabinet approval, normal legislative process will follow (incl. Select Committee process & public submissions)

We will work with local government and other interested parties to help us scope any new regulations.

Environmental Reporting Q&As

Why do we need to monitor and report national environmental information?

New Zealand needs high quality national environmental information so New Zealanders can identify and understand trends in our environment. High quality national-scale environmental information is important for setting national environmental policies and standards, and identifying emerging environmental issues. It can also help decision-makers identify where more effort is needed. Improving the consistency of state of the environment monitoring at the local level will improve the quality of national-level environmental information and, in turn, the quality of environmental decision-making.

What happens now and what will be different?

The Ministry for the Environment currently undertakes New Zealand's national environmental reporting as part of its environmental statistics programme. This involves collating information from regional councils and other sources, to report on 22 national environmental indicators on a rolling schedule. The Ministry for the Environment would continue to regularly collate environmental statistics to feed into its environmental policy-making, meet international reporting obligations and inform public debate. However, the Parliamentary Commissioner for the Environment (PCE) would be given legislated responsibility for producing an independent national state of the environment report every five years.

What is in the proposed Environmental Reporting Bill?

The proposed Environmental Reporting Bill plans to:

- (1) give the PCE an explicit role under the Environment Act 1986 to produce independent five-yearly reports on the state of the environment
- (2) expand regulation-making powers under section 360 of the Resource Management Act 1991 (RMA) to allow the future development of regulations that improve the consistency of state of the environment monitoring statistics at the local level.

How will the proposed Environmental Reporting Bill affect regional councils?

Any future regulations that may be made under the proposed Bill will likely affect regional councils' state of the environment monitoring programmes. At this stage the exact nature or scope of any future regulations is yet to be identified. The impact of these regulations on regional councils will depend on how well their current monitoring programmes comply with the requirements of any future regulations.

However, the proposed Environmental Reporting Bill is in the very early stages of development so the exact nature or scope of any future regulations – and therefore their costs – cannot yet be determined. Once specific regulatory requirements are identified, the costs and who should pay will become clearer.

How is national environmental reporting handled in other countries?

A 2010 review by the PCE on environmental reporting found that in 20 of 30 OECD countries, state of the environment reporting is undertaken by an institution that has some legislated degree of independence. This degree of independence varies – the most independent institution is in Denmark, where Aarhus University produces the report. In the ten OECD countries (including New Zealand) where environmental reporting is not done independently, it is run by a ministry or government department.

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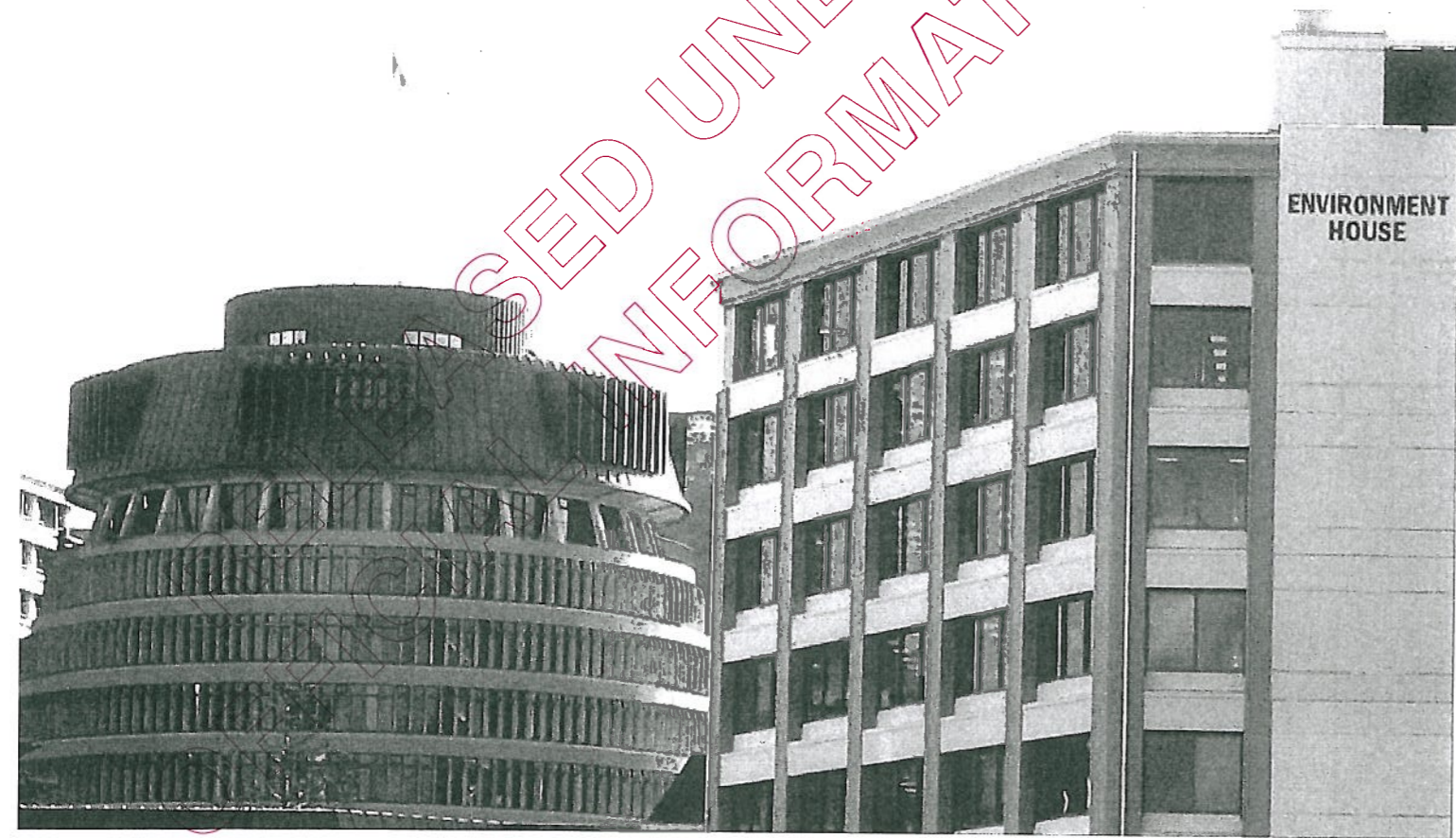
Status Report

Minister for the Environment

Minister for Climate Change Issues

Week beginning 14 November 2011

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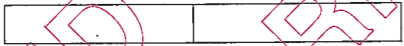
Seen by Hon Dr Nick Smith _____ Date _____

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3.4 Summary of Submissions on the Environmental Reporting Discussion Document

Discussion document award

On 8 November, the Wellington Branch of the New Zealand Planning Institute (NZPI) announced that the *Measuring Up: Environmental Reporting – A Discussion Document* had won us the Geok Ling Phang Memorial Award. The NZPI commented that “the Ministry for the Environment’s document...is an excellent example of what a consultation document should look like. It should be recognised for its presentation and representation of the problem statement and alternatives...The document sets a new benchmark in terms of public consultation documents and should be a template for further policy discussion.”

Releasing the submissions and summary of submissions

Seventy-six submissions were received on the Environmental Reporting Discussion Document. We have provided your office with the draft summary of submissions. We propose to release the summary of submissions and copies of each submission received on the Ministry’s website in December, with personal details removed. We do not consider that there are any risks associated with making these documents available and anticipate that they will be requested under the OIA if we do not proactively release them. The Parliamentary Commissioner for the Environment has already requested copies of the submissions and is awaiting a response.

Do you agree that the summary of submissions on the Environmental Reporting Discussion Document should be published on the Ministry’s website in December 2011?

Yes	No
-----	----

Do you agree that all submissions received on the Environmental Reporting Discussion Document should be published on the Ministry’s website in December (with personal details removed)?

Yes	No
-----	----

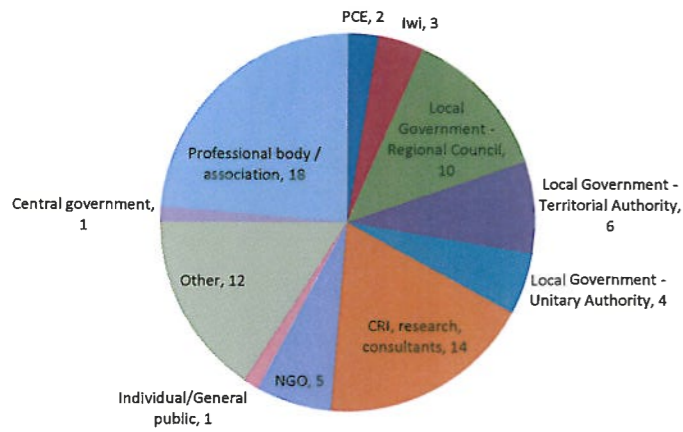
Sonia Wansbrough

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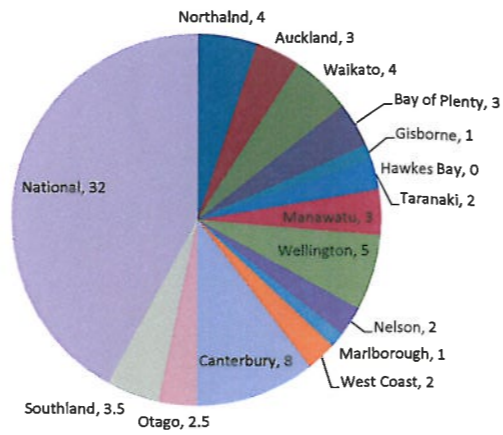
Sector	Region	Overall view	Which is bigger issue	Options (PCE)	Options (RMA)	New domains	Most important domains	Frequency of reporting
PCE	Northland	Support 75	Reporting 4	Support 42	Support 29			5 year 37
Iwi	Auckland	Oppose 0	Monitoring 13	Don't support 11	Don't support 7			3 year 3
Local Government - Regional Council	Waikato	Unknown 1	Both 19	Didn't say/can't tell 23	Didn't say/can't tell 40			3 or 6 year 1
Local Government - Territorial Authority	Bay of Plenty							6 year 1
Local Government - Unitary Authority	Gisborne							
CRi, research, consultants	Hawkes Bay	agree with objectives	Agree with criteria					a number said 5-yr with interim should be...
NGO	Taranaki	Yes 30	Yes 30					
Individual/General public	Manawatu	No 7	No 6					
Other	Wellington	Didn't say/can't tell 39	Didn't say/can't tell 40					
Central government	Nelson							
Professional body / association	Marlborough							
	West Coast							
	Canterbury							
	Otago							
	Southland							
	National							
	Note one submission counted twice in Otago and Southland (0.5 each)	76						

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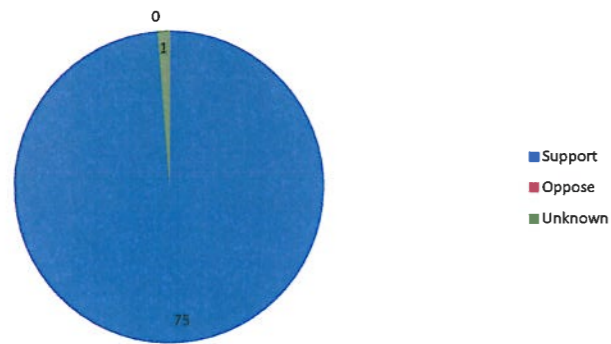
Types of submitters



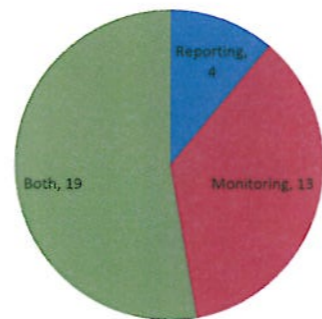
Geographical distribution of submitters



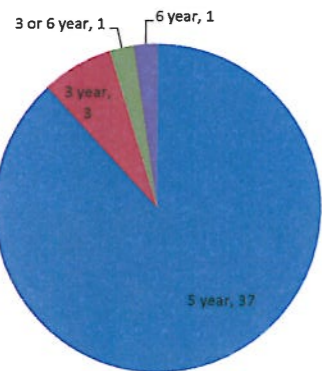
General feeling towards proposal for change



Which issue is bigger?



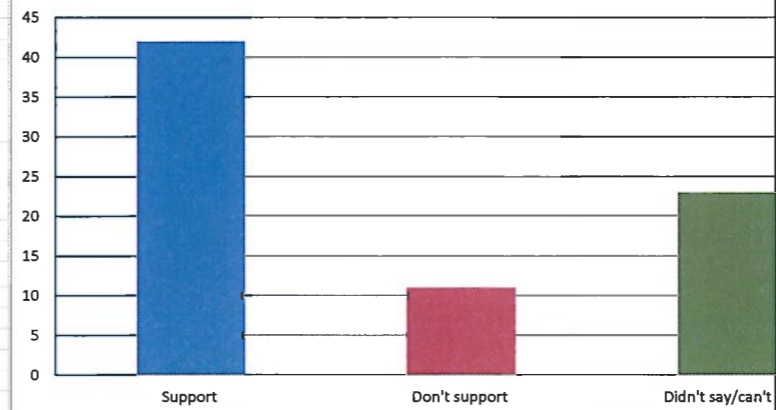
Frequency of reporting



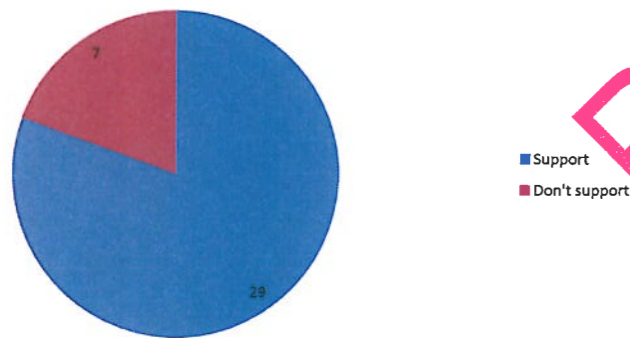
Amend Environment Act to require PCE to report



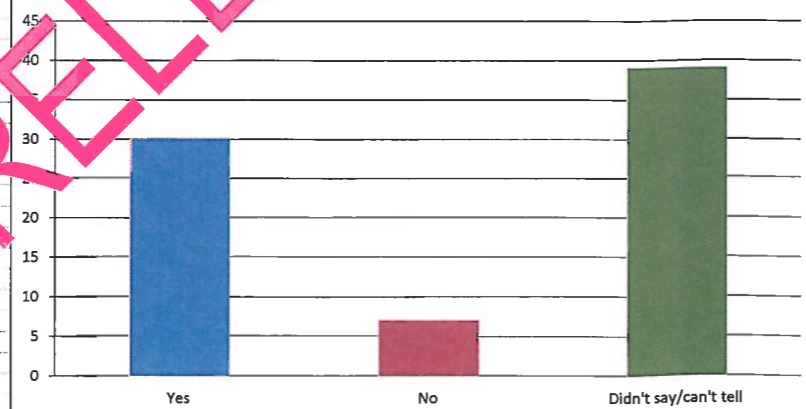
Amend Environment Act to require PCE to report



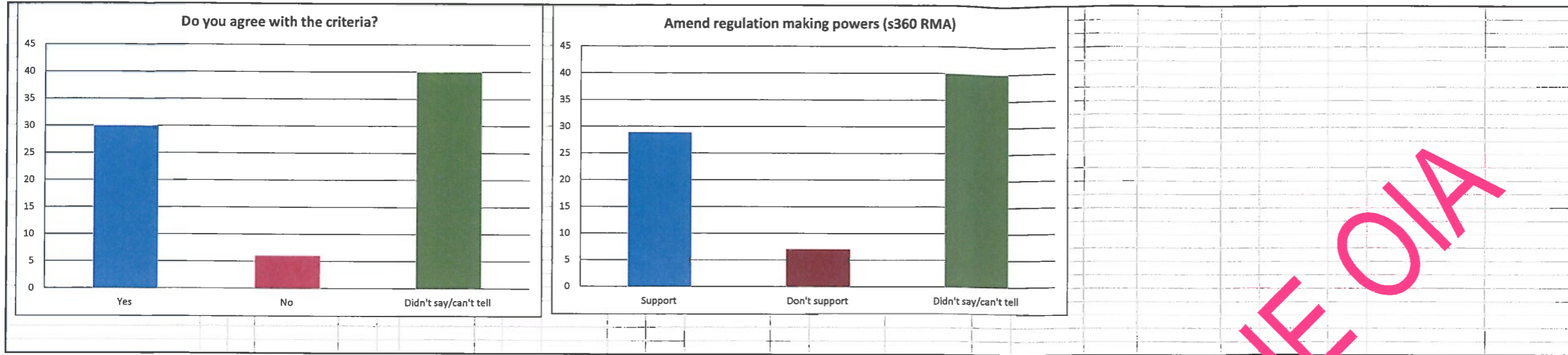
Amend regulation making powers (s360 RMA)



Do you agree with the objectives?



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Submitter no	sector	region	Overall view (ge)	Questions										Reporting		Monit		Costs and benefits					
				Problem, Objectives, criteria																			
				1a	1b	2	3a	3b	4	5	6	6a (PCE)	6b (RMA)	7	8	9	10	11	12a	12b	14	16	17
P, I, LR, LT, LU, R, N, G, O	S, D, U	Y, N	Y, N	Y, N	R, M, B	Y, N	Y, N	Y, N	Y, N	Y, N	Y, N	Y, N	Y, N	Y, N	Y, N	Y, N	Y, N	Y, N	Y, N	Y, N	Y, N	Y, N	
1	I	Wellington	S																				
2	O	Canterbury	S	Y	Y	N		B		Y													
3	LT	West Coast	S																				
4	R	Auckland	S						Y	N													
5	P	National	S																				
6	A	National	S	Y	Y	Y		B	Y	Y	Y	Y	Y		PCE	Y				Y			
7	A	National	S	Y	Y	Y		R	Y	Y	Y	Y	Y			Y	3				N		
8	R	Bay of Plenty	S	Y	Y	Y		B	Y	Y		N	Y	N	?	?	N						
9	N	Southland	S														Y						
10	LT	Canterbury	S																				
11	LT	Northland	S																				
12	PF	National	S																				
13	I	Waikato	S																				
14	LR	Southland	S						N														
15	LR	Canterbury	S	Y	N	Y		M	N		Y	Y	Y	Y									
16	LT	Northland	S	Y	N	Y		B	N	N			N										
17	L/A	National	S	Y	N	Y		B	N	N		Y	N	Y									
18	R	Canterbury	U						N														
19	N	National	S																				
20	O	National	S																				
21	LR	Waikato	S	Y		Y		B	Y	Y	Y	Y	Y	Y									
22	LU	Gisborne	S						Y														
23	LR	Taranaki	S see i132 (supp N						Y	N	N	N	N	Y									
24	O	Otago and South S	S	Y		N																	
25	LU	Nelson	S	N see i151					Y		Y	Y	Y										
26	R	Bay of Plenty	S	Y		N		M	Y	Y	Y	Y	Y	Y	Y					Y		N	
27	R	Northland	S	Y		Y		huge	M		Y	N											
28	LR	Bay of Plenty	S																				
29	A	national	S	Y		Y			B	N	Y		N		Y								
30	A	National	S	Y		N			B	Y	Y		Y	N	Y								
31	A	National	S	Y		N			Y	Y	Y	Y	Y	Y									
32	O	Canterbury	S																				

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Y - Environment Act ammendment requiring PCE to report

Y - preferred option 2. huge cost, but benefits outweigh costs

addresses issues, but suggests NES

would help resolve problems

3 years see issue 7

52 see issue re me ium term reporting

6 yearly (2 electi ... cycles

N - what is the value (\$) to N to monitor the

Y - report yearly re: p hot to, issues

also need integim eg reporting annual smaller reports

to be need in review' g and checking 'ata in inbetween years

to be need in review' g and checking 'ata in inbetween years

can't comment due to lack of info

can't tell

potential for litigation from new legislative provisions

all identified

will make available if requested

33	A	National	S	Y	Y	M	Y	N	Y	Y	Y	won't address lack of reporting on wider oceans domain	N	Y	with some reporting on more regular basis	N	Horizon scanning market and non-market ecosystem services, future benefits
34	O	Nelson	S														
35	LR	Northland	S	Y, N	N	N			Y	Y	Y	PCE OK, Monitoring option won't address problem	Y	Y	Y - PCE option will devier highest net benefit		
36	A	National	S	Y		Y	B		Y		Y						
37	R	Waikato	S								N			Y, along with interim reporting			
38	A	National	S	Y	Y	M	Y	Y	Y	Y	Y	Y partially support		Y with continuous monitoring where appropriate			Y
39	R	Canterbury	S														match to govt cycle and Long Term Plan development
40	A	National	S	Y					Y	Y	Y						
41	CG	National	S	Y	Y	M	Y	Y			Y	Audit identified		Y			
42	O	Wellington	S	Y	N	M	Y	Y	Y	Y	Y	option appears to be logical next steps	N			annual integrated report	
43	A	National	S	Y	Y				N	N		Should be created unnecessary coordination problem	Not supported	Y			datasets could be made available yearly
44	O	Auckland	S	Y					Y	Y				Y			

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45	O	National	S	Y	N	M	Y	Y	Y	Y	Options address problems	N	Y		mechanisms for allocating costs	how costs filter down to the community
46	R	National	S	N		B	Y	Y	N	Y	option of using Government statistician	N	Y	More frequent for some categories like freshwater, fish stocks		
47	R	National	S	Y	Role of science	M	Y	Y	Y	Y			Y	appropriate		
48	LR	Wellington	S	Y	Y	B		Y also include actual cost	Y	Y			Y	supports PCE role		value to NZ to monitor at national level
49	LR	West Coast	S							Y			Y			
50	I	Waikato	S	Y		B	Y	Y		N	addresses problems	N			impacts of co-governance and co-management	engage with Waikato-Tainui
51	R	Taranaki	S			R		Y	Y	Y			Y		what is current council expenditure?	
52	R	Canterbury	S	Y	Y	B	Y	Y	Y	Y			Y			
53	N	National	S	Y		B		Y	Y	Y			Y			
54		WITHDRAWN														
55	A	National	S	Y			Y						Y	engage with public		should not be understated
56	A	National	S							N						
57	A	National	S													
58	LR	Otago	S													
59	A	National	S	Y		B	Y	Y	Y	N	support leg chagn		Y	along with system to identify urgent issues		costs will be high
60	O	National	S				Y	Y	Y	Y			Y	support 5-yr, but arguably infrequent		
61	N	National	S	Y		M	Y	Y	Y	N	identifeid option (with NES) will delvier highest net benefit		Y			
62	A	National	S							N						
63	A	National	S	N		M	Y				creation of specific national environmental monitoring and reporting agency	N	Y	or less regular but more comprehensive if required by CBA, no more tha 10-yr		
64	LR	Manawatu	S													
65	O	National	S							N						
66	R	Wellington	S							Y			Y			
67	A	National	S							Y			Y			
68	R	National	S	Y			Y	Y	N	Y			Y			Have experience designing and implementing systems for biodiversity and land, etc

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Subr sector	region	12b	13a F, L, O, B, A	13b	15 F, L, O, B, A
1	I Wellington			Environment, exotic biodiversity	I
2	O Canterbury		B	invertebrates, indigenous plants, birds and other vertebrates	B
3	LT West Coast			confine what is meant by environment e.g biophysical environment	
4	LR Auckland			Waste, cost of landfill	water resources
5	P National			Coastal environment	
6	A National	3 years		impacts of wilding conifers and their management	
7	A National			Ecosystem services	ecosystems of different regions
8	R Bay of Plenty			Coastal environment	
9	N Southland			management	
10	LT Canterbury			Ecosystem services	
11	LT Northland			Coastal environment including oceans	Freshwater, then land and biodiversity together. Put oceans into coastal environment
12	PF National	medium term reporting		built, social or cultural components; contiguous relationships that may exist across domains;	
13	I Waikato			built, social or cultural components; contiguous relationships that may exist across domains;	can't prioritise but suggest adding iwi and cultural monitoring
14	LR Southland	6 yearly (2 election cycles)		Geothermal; estuarine, rename oceans to marine to include territorial sea and EEZ/iwi and cultural monitoring	freshwater, biodiversity, land, estuarine waters, air, marine, geothermal.
15	LR Canterbu				
16	LT Northland				Freshwater, land
17	L/A National			atmosphere included in air?	Freshwater. Followed by land and specifically soil monitoring
18	R Canterbury			need to specifically include surface water, ground water and coastal marine (including estuaries)	freshwater, biodiversity, land, estuarine waters, air, marine, geothermal.
19	N National			estuaries/coasts	
20	O National			oceans to include NZ total sovereign marine environment incl territorial sea, EEZ and continental shelf	freshwater quality, productive land use, soil.
21	LR Waikato			all supported	Freshwater
22	LU Gisborne			support these	all listed plus estuaries/coasts
23	LR Taranaki			Agree	freshwater well developed, marine is not
24	O Otago an	yearly report on hot topic issues		difficult to think of natural or physical resource outside these domains	Indigenous Biodiversity, lowland ecosystems
25	LU Nelson			all land uses (conservation through to rural commercial to urban), landuse to include erosion, but methodology is constrained	
26	R Bay of Plenty	these are appropriate		supported	
27	R Northlan	also need interim reporting eg annual smaller reports	OK	supported	
28	LR Bay of Plenty			difficult to think of natural or physical resource outside these domains	
29	A national	need to be reviewing and checking data in inbetween years		all land uses (conservation through to rural commercial to urban), landuse to include erosion, but methodology is constrained	
30	A National	3 years to align with councils preparing long term plans		supported	
31	A National	with some reporting on more regular basis		supported	
32	O Canterbury			supported	
33	A National			supported	
34	O Nelson			supported	
35	LR Northland			supported	
36	A National			supported	
37	R Waikato			supported	
38	A National			supported	
39	R Canterbu	match to govt cycle and Long Term Plan development		supported	
40	A National			supported	
41	CG National			supported	
42	O Wellingt	annual integrated report		supported	
43	A National			supported	
44	O Auckland	datasets could be made available early		supported	
45	O National			supported	
46	R National	More consent for some categories like freshwater, fish stocks		supported	
47	R National	appropriate		supported	
48	LR Wellington			supported	
49	LR West Coast			supported	
50	I Waikato			supported	
51	R Taranaki			supported	

DRAFT

52	R	Canterbury	Appropriate	Coastal rather than oceans, atmospheric conditions as they pertain to climate change and UV radiation	freshwater, land quality, biodiversity
53	N	National	For PCE to determine		
54	WITHDRAWN				
55	A	National	appropriate assume includes liminal zones like wetlands and coasts		Oceans, should be informed by ecosystem services approach
56	A	National			
57	A	National			
58	LR	Otago			
59	A	National	along with system to identify urgent issues	freshwater ecosystems incl inland aquatic systems (eg salt lakes)	Freshwater
60	O	National	support 5-yr, but arguably infrequent		
61	N	National	supports these	coast to capture land/sea interface	Oceans, followed by freshwater and terrestrial biodiversity
62	A	National		lands/sea interface incl land-based sources of marine pollution	
63	A	National	or less regular but more comprehensive if required by CBA, no more than 10-yr		
64	LR	Manawatu		add ecosystem services, divide land into land use, landuse intensity, land cover, landscapes and soils	
65	O	National		Not a job for PCE. Should be experienced hands of CRI and University science teams	Freshwater, emissions from land
66	R	Wellington			
67	A	National			
68	R	National			
69	R	Manawatu			
70	O	Southland			
71	LU	Auckland	Support	land, mineral production, energy, water resource, fisheries and aquaculture, biodiversity, forestry, livestock and crops, atmosphere, water quality, soils	Water
72	N	Wellington	with annual report cards		
73	LT	Manawatu		Built environment (e.g. greenhouse gas emissions, green networks of parks and reserves, etc)	freshwater
74	LU	Marlborough	List is too narrow	also include water, natural hazards, heritage, energy, landscape and urban development	Freshwater, Also should mirror govts management priorities as communicated by work programme for national policy statements
75	G	Otago			
76	O	National	3.0r 6 year	ecological/biological parameters (eg macro-invertebraes) along with chemical parameters	Freshwater, land
77					

REFLECTED AS SEED AND REFINED

RELEASED

Issue number	Issue sub-theme	submitter number and sector code	Comments
22	Prob issues not considered	A6	performance of both the regulator and service provider is an issue that has not been considered
33	Prob issues not considered	A7	The most recent data relating to waste to landfill available from the Ministry for the Environment is 2007-2008 with a snapshot update in 2010. However using the solid waste audit data to identify particular problem areas specifically with regard to glass being placed in landfill is difficult if not impossible because each waste report is based on different criteria.
34	Prob issues not considered	A7	From industry's perspective, the Forum relies on its own data collection process to identify the glass mass balance data in New Zealand.
35	Prob issues not considered	A7	Legislation requiring territorial authorities to produce consistent data will allow industry (and Government) to recognise particular problem areas. The discussion document does not identify the benefits to industry which would result from this proposed legislation
41	Prob issues not considered	R	as a former employee of a Regional Council, I regularly witnessed these problems between councils, and between reporting periods within the one council. There exists too much scope for "interference" from local body politicians, and so there is currently considerable inconsistency in the data and methods used in collection.
42	Prob issues not considered	R	Additionally, other important issues have not been included, which reveals a demonstrable lack of useful real-life data relating to some important environments, e.g., the coastal environment
62	Prob issues	LR15	should be "national" state of the environment reporting
63	Prob issues	LR15	inconsistent regional monitoring programmes needs to be broadened to include all agencies that contribute environmental statistics
64	Prob issues	LR15	what SOE monitoring and reporting frameworks will be used and why? Monitoring can be for different purposes
81	Prob issues not considered	LT16, LA17	Quality Assurance, training and qualifications, and analytical capacity/capability
136	Prob issues	LR23, O32, LR48, LR49, N61, LR64, LU71	in most cases regional variation in SOE monitoring programmes is entirely appropriate and should be recognised
137	Prob issues	LR23	seek amendment of issue 2 to address gathering high quality environmental statistics from all sources rather than just focusing on regional councils
151	Prob issues	LU25	Issue is too narrowly focused on regional environmental monitoring. Inconsistencies in data collection, analysis and presentation methods are not confined to regional councils
174	Prob issues	LR28	Council supports the matters raised in the discussion document (page 10) to reduce overall State of the Environment (SOE) reporting duplication and promote cost-efficiencies. Most regional councils produce, and make publicly available, regular information on the raw data collected for specific natural resource matters. This information is used to inform evidence based local decision-making. Council believes that typical audiences of regional SOE monitoring information want raw monitoring data. Council believes the general public would be better served by the national SOE report that enables regional comparability. Local responses to natural resource issues are identified and discussed with the community through the development of Council's policy frameworks and Long Term Plans. On the assumption that the Bill proceeds (as outlined in Chapter 5), Council recommends that the Ministry boosens its expectations on local authorities to produce separate SOE information for their respective area. (goes onto provide specific recommendation with 3 bullet points)
175	Prob issues	A29	environmental reporting should permit valid international comparisons with trading partners and trade competitors
196	Prob issues	A33	Issue 2. We believe that there are two issues here. The first is that MIE appears to be unaware of existing data sources and indicators collected by other agencies in the ocean domain, or that these data are not collected in a co-ordinated way that is managed and accessible. MIE has co-ordinated several attempts to derive national marine indicators and stats and data information sources during the 1990's - 2000's, but lack of success was due to the non-national coverage, inconstant data collection, non-management of data and inaccessibility of data, and the affordability to get anything more than the status quo. The second is the lack of legal requirement for Regional Councils, but also for CRIs and government agencies to collect national-scale data unless they are required to report on Tier 1 Statistics. The current review of the environmental Tier 1 statistics should somehow link to the proposed Bill.
198	Prob issues	A33	It is not just about New Zealand's environmental performance, but our achievements in meeting the blue-green growth agenda, and our ability to demonstrate that new developments are undertaken and are remain within environmental limits. There is a need for scientifically rigorous indicators as well as measures of long-term environmental change.
200	Prob issues	A33	Yes we think there are a few other issues that could be addressed by this Bill. (a) National level environmental reporting (extend scope beyond RMA), (b) 12nm reporting (provides details (c) Integration of national and local reporting (provides details) (d) Integration across organisations at local level and at national level. A coordinated network that integrates existing marine research and monitoring efforts will greatly improve understanding of the status and trends in biodiversity of New Zealand waters at relatively modest cost.
210	Prob issues	LR35	With regard to issue 2, it is the regional councils view that the discussion document does not articulate the basis for differences in national reporting due to differences in regional environmental monitoring. In particular, it would be more helpful if the Ministry elaborated on what particular data sets or variables were frustrating national reporting. The identification of such would assist in identifying possible remedies including for example the possibility of increased alignment or participation of Crown research institutes
211	Prob issues	LR35	the data for environmental reporting will not necessarily be the same data that is required for policy development. The discussion document does not adequately cover the distinction between data that tells us about the current state of our environment, data that tells us about the drivers and causes of problems, and data that tells us about the impacts and if our interventions are working. It is also important that the data and reporting reflect appropriate indicators, both at the national and regional level
223	Prob issues	A36	The issue is not just a lack of statutory obligation in New Zealand for regular and independent monitoring (e.g. RMA Section 45 currently includes requirements for state of the environment monitoring) but a lack of focus by government agencies on biodiversity monitoring, particularly monitoring on private land (Q.2). Agencies need to work together with local government and private landowners. Representatives (e.g. QEII National Trust, Nga Whenua Rahui, and NZ Landcare Trust) to achieve standard systems, that have integrity, and provide co-ordinated results at a regional, national and international level
233	Prob issues	A38	The issue of added cost has not necessarily been fully identified - It is plausible that an added intensity and or frequency of data collection may arise from a national framework in some aspects and for some regions. In addition to regional measures that may be deemed necessary to establish datasets for local significant issues. Some of these costs may be offset by the benefits of standardisation, bulk contracting and centralised processing and reporting that may become possible.
245	Prob issues	CG41	Environmental issues that are faced by local authorities may not be uniform across the country that will require some degree of flexibility in monitoring requirements that recognises this diversity.
252	Prob issues	A43	Has significant doubts as to the characterisation of the problem. Lack of independence. Suggests *independence is just one of a basket of quality-related characteristics, *the NZ proposal is at odds with international comparability. *changing governance arrangements is unlikely to be 'fit-for-purpose'. Argues that independence is not really needed.
253	Prob issues	A43	Business NZ would have liked to have seen a discussion about how the proposal will advance New Zealand's growth agenda, and more specifically, the Government's green growth agenda. Generous comment about the New Zealand's clean and green image are interesting, but not a sufficient basis on which to make regulation.
267	Prob issues	O46	proposal is flawed because it excludes Environmental statistics generated from reporting via other environmental related Legislation; Environmental information collected by central government agencies, Crown research institutes and universities. The proposal would reinforce: Silo thinking; Confusion in the 'marketplace'; Inconsistencies regarding methodologies; Inconsistencies in quality and frequency of data and in some instances may require entities to report environmental data to multiple agencies.
268	Prob issues	O46	Not appropriate for PCE to prepare reports because would be like asking the Controller and Auditor General to prepare accounts for all the agencies it audits. PCE could let the Government Statistician or a least under his/her overview as outlined in Part 1 of the Statistics Act 1975 (s3-11) Reporting should be done by the Government Statistician or a least under his/her overview as outlined in Part 1 of the Statistics Act 1975 (s3-11)
278	Prob issues	R47	document does not cover why national monitoring and reporting is important
292	Prob issues	LR48	The issue states we do not currently comment on the purpose/objectives of the national level state of the environmental monitoring and reporting. We do not agree there is a problem with inconsistency between regional council monitoring programmes and that they require standardising
296	Prob issues	LR49	Do not agree there is a problem with inconsistency between regional council monitoring programmes and that they require standardising
300	Prob issues	IS0, N73	ISSUE: REGULAR AND INDEPENDENT report - focus is on independence, not regular which is also important
308	Prob issues	A55	There are several other issues that should be considered: monitoring of regions beyond territorial authorities, the need for clear objectives in monitoring, the gap between regionally-relevant data and nationally-relevant data. Should include conservation land and EEZ, be clear what we are trying to monitor for
315	Prob issues	A55	how do SOE reporting interact with goals of NPS? NPS on freshwater provides guidance on monitoring and reporting
321	Prob issues	N61	there is a lack of reported data in many key areas e.g. oceans, fisheries, marine protection, sedimentation. Suggest there is a lack of resources or expertise of some local authorities to undertake monitoring. There are many obligations under RMA that are not complied with by local authorities who commonly cite reasons as lack of resources, or a decision by elected councillors
336	Prob issues		The NZIF believes that achieving high quality, consistent national environmental reporting is more than merely assigning the responsibility for a five yearly report to the Parliamentary Commissioner for the Environment and legislating standardised methods of assessment by regional councils. National reporting, by definition, requires top-down specification of the methodology. It is therefore logical that methods and data collection be managed centrally rather than at regional council level. There is merit in maximizing the benefit of nationally managed specialist skill-sets rather than having regional duplication
340	Prob issues	A63	Not convinced lack of statutory obligation is main problem. Statutory obligation still requires commitment from govt of the day to provide funding and resources. Agree statutory obligation will help ensure funding and resourcing is available.
341	Prob issues	A63	There will be issues concerning how monitoring might be implemented to provide a state of the environment report, but resolution of these may need to await higher level decisions on whether or not there is to be a statutory obligation and which agency would be responsible for completing such obligation.
351	Prob issues	R68	several other issues must also be addressed if the problem of environmental reporting is to be rectified, including: 1) clearly delineating the roles and responsibilities of different ministries, departments and institutions contributing to environmental reporting, including Crown Research Institutes such as NIWA, GNS, and ourselves, who manage Nationally Significant Databases that are critical to environmental reporting. 2) providing national standards and methods for data collection, processing and reporting where warranted. 3) establishing systems and providing resources to train, up skill, and maintain capabilities needed to generate and report on environmental information in all contributing organisations. 4) using techniques such as integrated catchment management planning, landscape planning, ecosystem services assessment, and natural asset management planning to ensure that policies and strategies developed are informed by current monitoring data and that the monitoring will be used to evaluate policy outcomes at international, national, regional, and local levels.
370	Prob issues	R69	Is about irregular reporting, not inconsistent reporting - word inconsistent is wrong word to use
384	Prob issues	LU71	document states MIE has worked with local govt to try to improve consistency, but this has not worked. Would be useful to provide evidence of how they have worked with local govt and how they determined this has failed
392	Prob issues	N72	The two issues addressed in the discussion document are expanded to three. The three issues are: Issue 1: There is a lack of statutory obligation in New Zealand requiring regular state of the environment reporting (we have highlighted the three components as the law, the timeliness and the content). Issue 2: There is a lack of statutory obligation in New Zealand requiring independent state of the environment reporting (we have highlighted the three components as the law, the independence and the content). Issue 3: There is a lack of consistent regional state of the environment monitoring programmes (we have highlighted the three components as the need for consistency, the collection of regional data and effective monitoring).

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191	Prob scale of problem	A31	IPENZ believes the inconsistencies listed on page 10 of the discussion document (which include inconsistencies in the variables being monitored and the frequency of monitoring etc) are significant and the limiting factor for understanding the state of the environment. There is also a bias towards those variables required by statute, regulation or national guidelines. Examples include microbial quality of coastal and river waters (required by the Ministry for the Environment and the Ministry of Health recreational bathing and shellfish guidelines) and air quality (required by National Environmental Standards). We think resolving these inconsistencies to be fundamental. Resolving inconsistencies will enable benchmarking and opportunities to consider why quality levels differ by region or by other parameters. This will enable discussion and debate about how activities, policies and practices affect different environmental domains. Once these issues are resolved, state of the environment reporting will be more straightforward
212	Prob scale of problem	LR35	contains minimal evidence to suggest that differences in regional state of the environment monitoring are a cause for concern or are frustrating national reporting. There is limited discussion on the different aspects of reporting – pressure, state, response. The problem may be better resolved by central government deciding exactly what reporting is required (the indicators) and then seeing how regional monitoring can contribute and where the gaps lie
43	Prob scale of problem	R	There is a lack of audit control over reporting, and currently a lack of scrutiny of sampling site consistency, and a lack of control over timing of sampling (e.g. sampling is being demanded during periods of fine weather rather than during or post-storm, to avoid 'embarrassing' sediment or effluent (i.e. real) discharges); and actual state of contamination by nitrates of ground water in Canterbury)
65	Prob scale of problem	LR15	problem is lack of a "national" SOE monitoring network which all agencies can participate in
309	Prob scale of problem	A55	Regional authorities are often well aware that there is inconsistent state of the environment reporting. Equally, there is a good deal of consistency. The inconsistency is not driven by a lack of will but by a lack of resources. The situation could be improved without further changes to legislation by creating a standard repository for information.
82	Prob Objectives	LT16, L/A17	The objectives need to refer to national state of the environment monitoring. The objectives also need to refer to indicator selection and funding
57	Prob Objectives	LR14	future framework and objectives are of concern. Further detail and consultation is required with Local Government prior to legislation being progressed. In particular (1) additional information on future reporting frameworks and indicators so implications for region can be considered; (2) ES has developed monitoring programme and there is concern this may no longer fit the national framework criteria; (3) concerns about how data collection will be funded.
104	Prob Objectives	R18	the scope does not cover environmental data collected in other ways. I can see the sense in limiting the problem in this way; however, there would be value in a long-term strategy that looks at all environmental quality data and integrates them into one free-access, user-friendly, web-enabled database.
105	Prob Objectives	R18	An objective of the policy is that "high quality environmental statistics are available to underpin state of the environment reporting and environmental policy-making." The issue where attention is needed is a broader one that data are not used to underpin good environmental decision-making. The limitations are institutional rather than technical, and Central Government has the potential to advance the ability of many organisations to make more and better use of data that have been expensively collected and inefficiently used.
113	Prob Objectives	LR21	does not clearly spell out purpose of environmental reporting
118	Prob Objectives	LR21	scope and experimental design of environment reporting programme should be determined prior to developing RMA legislative amendments, including clearly defined objectives for monitoring.
120	Prob Objectives	LR21, LR35, A38, A40, I50, A55	Make third objective "HIGH QUALITY" statistics (fit for purpose and meaningful)
138	Prob Objectives	LR23, LR35, LR48, L/J74	Confirm national focus in objectives
139	Prob Objectives	LR23	discussion document fails to demonstrate appreciation of huge gulf between environmental statistics/data and environmental information (capability and capacity to process data with integrity and understanding to generate defensible information). Also fails to demonstrate appreciation of need to understand context. More data does not mean better information.
166	Prob Objectives	R27	Doesn't see independence as a critical issue. - I agree with the first and third objectives but neither agree or disagree with the second objective. The second objective is the least important of the three objectives. I do not believe the independence of the reporting will have as greater effect on improving national environmental reporting as the other two objectives; if it is only "perceived" lack of independence then is it really important can it be fixed by better transparency rather than shifting the reporting to an organisation independent of government. Reporting should be done regularly, correctly and clearly with high quality data – if this is done with transparency (eg. underlying data available, clear methods etc) then does the reporting does not matter
176	Prob Objectives	A29	Don't agree independence is necessary. MFE or EPA are best placed to effectively and efficiently address issues
177	Prob Objectives	A29	additional objective should be reporting that enables valid and credible benchmarking against trade partners and trade competitors
185	Prob Objectives	A30	objectives should also include "high quality monitoring techniques and data to support high quality statistics" in the last objective
192	Prob Objectives	A31	also transparent authentic measurement standards
227	Prob Objectives	R37	The objective(s) of monitoring need to be clearly stated such as to guide the design of sampling programmes and selection of indicators that address the desired outcome. For example the objective of monitoring the effects of particular activities will require a different sampling design to one of providing an unbiased estimate of the ecological condition within a particular geographic domain. A case in point is the very recent CV "fems" ship grounding. The ability of New Zealand and/or environmental, commercial or Iwi groups to successfully create will depend on the robustness of environmental information available prior to the incident by which impact can be quantified.
254	Prob Objectives	A43	However, it is unclear why the role of state of the environment reporting must be independent of government. This objective potentially makes a sham of the consultation process as it can only lead to one outcome - delivery of the report by a government agency (such as a University or some other suitably qualified third party) or an Office of Parliament. As such, it biases the outcome towards the preferred solution.
255	Prob Objectives	A43	In BusinessNZ's view, the second objective should be reworded to reflect a desire to have a high quality report delivered. For example: "The state of the environment report is credible, and can be relied upon by users to reflect a balanced approach to environmental reporting." This reflects the Ministry for the Environment's own words from page 7 of the discussion document. In addition, the desired option should be shown to deliver a net public benefit and this too should be a criterion to be met by a preferred option.
149	Prob Objectives	O24	would add objective around long-term data storage to minimise the data being lost due to restructuring and other political changes
11	Prob Criteria	R/G4	assessment criteria - methods should be cost efficient including method for assessing invertebrate biodiversity
156	Prob Criteria	R26	Could add criteria "fit with international monitoring standards" so system developed is internationally recognised and can contribute to global statistics
140	Prob Criteria	LR23	disagree with criteria E. Focus should be wider on national environmental monitoring. Provide alternative wording
66	Prob Criteria	LR15	criteria seem more like principles. More detailed content also provided
83	Prob Criteria	LT16, L/A17	The assessment criteria appear to be objectives not criteria. Criteria also need to include: capability of the organisations to undertake the respective roles and funding/cost.
178	Prob Criteria	A29,	additional criteria is chosen option must allow for a range of data collection systems and processes. Necessary to ensure confidence in consistency and independence
201	Prob Criteria	A33	We do not see how the proposal will lead to criterion A being met. The government is giving very mixed messages about its commitment to independence. For example, "science is being merged with MAF? Why has Archives NZ been merged with Internal Affairs? If the proposal is to be a natural fit with legislation reporting on those interfaces need to be spelled out, and if independence is required, an indication of how that will be achieved (over other agencies/mandates).
213	Prob Criteria	LR35	Any preferred option should provide a cost-efficient way to achieve consistency in regional environmental monitoring for national reporting purposes. The solution should be able to be implemented with minimal administration and compliance costs.
214	Prob Criteria	LR35	Any preferred option should provide a cost-efficient way to achieve consistency in regional environmental monitoring for national reporting purposes. The solution should be able to be implemented with minimal administration and compliance costs.
225	Prob Criteria	A7	assessment criteria (O5) are fair; however, the wording in this section should be changed. We recommend that "Effective and trustworthy reporting" must be upfront and free from perceived bias" (Assessment criterion B, p. 15) be changed to "Effective and trustworthy reporting must be upfront and unbiased"
256	Prob Criteria	A43	There is no assessment criterion that relates to the need for the solution to the reporting requirement being the least net-cost option. This needs to be added. In addition, it is unclear what the criterion "Be cost-efficient" in the context of consistent statistics actually means. While BusinessNZ agrees that the solution should be able to be implemented with minimal administration and compliance costs, the preferred option should be the one whose net present value of costs and savings are the lowest (in other words, the least net-cost option). Both proposals should use the same criterion in this regard. Criterion B states that: "Trusted national state of the environment reporting requires an element of independence....." (emphasis added) BusinessNZ considers this to be an appropriately balanced view of the need for independence and that this more balanced view should be reflected throughout the rest of the discussion document.
270	Prob Criteria	O46	Suggest using some of the criteria from "Towards Integrated Reporting" page 12 (www.theirc.org) - strategic focus, connectivity of information, future orientation, responsiveness and stakeholder inclusiveness, and conciseness, reliability and materiality.
271	Prob Criteria	O46	Two key questions are who is the reported data intended to be used by? And for what purpose?
322	Prob Criteria	N61	Do not agree with explanatory comment that the solution should be able to be implemented with minimal administration and compliance costs if this entails reducing or significantly limiting the matters to be monitored.
355	Prob Criteria	A67	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?
44	Prob alternative to PCE	R8	The three 'objectives' as stated are essential in the quest for true SoE reports. While it is clear to many people that the PCE is independent of Government, inclusion of truly or universally and obviously independent institutes like universities would assist with this worthy goal.
36	Prob Consistent monitoring	A7	The Forum's experience with collating data on waste diverted from landfill shows that local authorities report data in different ways by volume or be weight; through one off waste audits or do not collate data at all. Some local authorities such as New Plymouth have excellent reporting systems. It is our experience through the management of the Love NZ programme that council staff are looking for leadership on how best to report data.
32	Prob Council responsibilities	A7	Whilst responsibility for reporting under the RMA rests with regional councils, in practice territorial authorities that put in place waste management services are those that should provide the data on collection tonnages
293	Prob Objectives	LR48	Objectives should include no additional cost to local govt

303	Prob Objectives	R51	objectives are necessary, but are they sufficient? Who will be responsible for selecting variables and parameters to be measured?
352	Prob Objectives	A67	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.
360	Prob Objectives	R68	Any solution for progressing environmental monitoring and reporting must provide guidance on the desired outcomes of the monitoring. These outcomes will help to define what information is gathered and how it is reported. Possible outcomes are quite diverse, including for example: a) international reporting commitments. B) informing the effects of environmental policy or management. C) national reporting on conservation achievement relating to expenditure. D) informing and revealing long-term patterns of environmental change.
362	Prob Objectives	R68	need robust methods and procedures that are available for scrutiny and audit.
371	Prob Objectives	R69	I agree with all except "The role of state of the environment reporting is independent of Government". Realistically, the data sets and the monitoring are funded directly or indirectly by the Government.
381	Prob Objectives	LU71	Objectives should be wider to capture the environmental well-being of NZ. Primary intent is to meet govts OECD reporting requirements and wider monitoring objectives are overlooked.
393	Prob Objectives	N72	That the 11 objectives to be used to assess options are as follows: 1. Ensure the title corresponds with the content (new). 2. Make the content relevant, assessable and cost-effective (content). 3. Collect regional data to report nationally (collect regional data). 4. Make reporting consistent (consistency). 5. Make reporting regular (timeliness). 6. Information is designed to be easily accessible by the public (new). 7. Separate the roles of preparation, verification and review (new). 8. Clarify in detail who is responsible for what (Assessment Criteria A). 9. Create a statutory obligation (in law). 10. Align legal responsibilities with those of existing institutions (Assessment Criteria C). 11. Make the report trustworthy, which implies the data is able to be verified (independence).
399	Prob Objectives	LU74	govt needs to be clear about the overall objective to enable the appropriate design of a national SOE monitoring programme eg difference between understanding the state of change of environmental condition compared to monitoring for effectiveness of interventions
403	Prob Objectives	O76	All we could add is that there could usefully be some discussion around what ought to be the 'interim arrangements' while the new system is put in place, and what might be the incentives to best ensure its urgent establishment. Regional Councils are notoriously parochial and historically resistant to central government direction, in part due to the imbalance (rural bias) of their governance makeup. Likewise industry still looks upon statutory direction in the form of regulations as an impediment to business when it can equally be viewed as an opportunity to underpin brand integrity. Regulation, well promoted and reported, can be a simple form of environmental accreditation.
408	Prob Objectives	O76	There is also a potential conflict of interest between Councils as regional development agencies under the Local Government Act, and their impartiality on reporting on the environment under the RMA. The other problem is that the opportunities to support development has short term (ie politically advantageous) benefits but potentially long term costs. For example, Environment Southland received staff advice in the early 2000s to establish comprehensive rules to limit the establishment of intensive farming in sensitive environments such as the Waituna catchment to ensure its protection. For political reasons at the time the Council opted against bringing in those regulations, and now the current (and quite different) council is struggling to know how to respond to an entirely predicted 'crisis'.
407	Problem, etc	O76	In addition, a further problem is that some analyses or the conclusions drawn from them can be affected by the politics of the bodies responsible for the environment.
377	Problem, etc	O70	Environmental data used to help form policy and improve population health should be as free from bias as possible

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ENVIRONMENTAL REPORT

394	options/Alternative	N72	We believe that five different institutions are required to work together to meet the ten objectives above. This means that the five-yearly report involves five stages, each fulfilling a distinct role. Stage 1: Data Collector: Local authorities complete the annual return and send it to Statistics New Zealand. The function of local authorities is to play a broad role in promoting the social, economic, environmental, and cultural well-being of their communities, taking a sustainable development approach (see Appendix 1). Stage 2: Data Provider: Statistics New Zealand could create a new dataset and place this data on a public website. The role of Statistics New Zealand is to provide official statistics for governments, businesses, communities and citizens that are trusted, of high integrity and quality, can be accessed by all and provide relevant and timely data on key aspects of New Zealand's economy, environment and society (see Appendix 1). Stage 3: Information Provider: The EPAB uses the Statistics New Zealand information and any other information they require to meet the purpose of the report. The EPA is the appropriate institution to consider for this role. Stage 4: Reporting: The EPA is the appropriate institution to consider for this role. Stage 5: Review: The EPA is the appropriate institution to consider for this role. Consideration could have been given to the establishment of a national environmental monitoring and reporting agency, as a clearly defined subsection of one or more government agencies and possibly located within the office of the PCE.
342	Options/Alternative	A63	We disagree that the preferred option will help make substantial progress in solving the current issues with environmental reporting or provide the most effective and robust solution to achieve the goal of separation of policy-analysis-reporting. This is because the preferred options: *address only a small subset of the issues with the current system of environmental monitoring and reporting. A key issue is identifying the appropriate data, providing independent analysis, and linking this to enable evaluation of the environmental consequences of appropriate legislation, regulation and land use decisions. *exclude consideration of the role and responsibilities of many organisations contributing to the environmental monitoring and reporting including other central government ministries and departments, Crown Research Institutes, universities, iwi, businesses and non-profit organisations. *place a strong emphasis on trying to correct problems of perceived lack of independence by shifting responsibility from one agency (Ministry for the Environment – MfE hereafter) to another (Parliamentary Commissioner for the Environment – PCE hereafter) without really dealing to the broader goal of how robust environmental information should be essential information (e.g. economic, population, production, health, social), very little will change. We do not debate – nor should we – the need to collect robust economic, demographic, social or human health information. However, 25 years since the passage of the Environment Act and 20 years since passage of the Resource Management Act, the overall environmental monitoring and reporting system remains ad-hoc, relatively uncoordinated, under-resourced and subject to change, despite the fact that the environment underpins our economic and social prosperity, our quality of life, and indeed life itself. Required changes would include (details provided)
358	options/Alternative	R68	One alternative option would be for the EPA to provide oversight and support for all of local authorities' functions under the RMA including overseeing the development and implementation of a national monitoring framework. The EPA would be the better agency to liaise with local authorities and implement the system, as the Ministry for the Environment is focused on policy development not operational issues. Under this alternative option the PCE would still be responsible for preparing the regular state of environment reports which would draw on the monitoring data.
359	options/Alternative	R68	Another alternative option could be to form a separate entity to fulfil the role of an environmental auditor. However, it is considered that this is unnecessary as the Parliamentary Commissioner for the Environment already has responsibilities to review environmental systems and Government policies.
324	options/Alternative	N61	Issues: 1. Regularity, and 2. Enforcing the requirement to change policy and planning documents in response to environmental information 3. Confirming participation of Māori in the developing of environmental reporting. Option: 1. Amendments to section 35 of the Resource Management Act 1991. Cost/Benefit Analysis 1. Co-Governance and Co-Management Arrangements
325	options/Alternative	N61	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
299	options/Alternative	I50	Rather than existing government bodies or CRIs/Universities, the reporting could be carried out by a new institution (for example, a Common Asset Trust) which would include multiple stakeholder perspectives including science to ensure "fitness for purpose" at multiple scales. Whichever organisation becomes responsible for environmental reporting, that organisation will require the expertise to carry out the duties placed upon it. This capability and capacity should be sufficiently resourced
305	options/Alternative	N53	We suggest that provisions under the Statistics Act should be dove-tailed with regulation powers under the RMA. i.e. options 2 and 3. In the Summary Table pages 19.
310	options/Alternative	A55	To extend to the full ocean domain, it may be necessary to amend legislation for CRIS, DOC Maritime New Zealand and Mfish (MAE).
202	options/Alternative	A33	Options such as regional government reporting with Parliamentary Commissioner for the Environment / Independent auditing etc. don't appear to have been considered
203	options/Alternative	A33	Amend RMA to clarify purpose of SOE monitoring, and reporting and clarify funding arrangements
264	options/Alternative	O45	The Institute is of the view that provision must continue to be made for regional reporting that is of significance at that scale
228	options/Alternative	R37	Some matters are only relevant to certain regions based on their environmental character, key industries and land uses and significant habitats and species. Regional reporting should be taken up into a broader national reporting framework to report the unique characteristics of each region.
231	options/Alternative	R37	There are numerous alternative ways to address the coordination of national monitoring and reporting. For example, a new organisation could be formed to address this matter and a host of other ones around the country. Although this would possibly necessitate another policy construct, it could equally be nested within an existing agency or organisation. For example, this (all) statutory purpose of the EPA and its final scope has not yet been determined and there is ample scope for this to be accommodated. Other models of national environmental reporting are referred to in the Measuring Up document that deserve further investigation. For example, in Denmark, Aarhus University has the role of undertaking thoroughly independent national environmental reporting. This model was acknowledged to be the most independent of those surveyed. The University of Waikato supports such an idea, and we would welcome the opportunity to contribute our expertise to national environmental reporting.
251	options/Alternative	A43	Should be role of MfE, not PCE
173	options/Alternative	LR28	The Bay of Plenty Regional Council (Council) feels that the proposal only goes some way to ensure independent state of the environment reporting. The document argues that there is value in making state of the environment reporting independent. If this is so, why does it only propose to make the last link in the governance chain independent of ministerial influence? Council recommends that the proposal should consider options where data definition (and data analysis) is transferred to a standalone Crown Entity that could be relatively independent of political interests and have regulation-making powers (and associated Crown Entity powers).
179	options/Alternative	A29	PCE will not hold a neutral starting position. It will not be in a position to "objectively and constructively questioning the status quo". Furthermore, current assessments and data collection by agencies and local authorities will remain largely unchanged, and under this option there will be duplication in processes for data collection and aggregation, with minimal advantage. It is noted a central body collecting and collating the data must be adequately resourced, and this would most efficiently and smoothly be accomplished by consolidating this reporting requirement with the Ministry for Environment.
167	options/Alternative	R27, R69	Require a CRI or University to carry out the environmental reporting
157	options/Alternative	R26	could use a third party contractor like the SOE Unit to compile the reports
145	Options/Alternative	LR23	MfE is best place to collate the data on national environmental information. PCE could have a role auditing how Ministry used the data
146	Options/Alternative	LR23	system similar to Stats NZ system of National Environmental Accounts would be appropriate
147	Options/Alternative	O24	consents
148	Options/Alternative	O24	consents
150	options/Alternative	LU25	would support a whole of system approach
122	options/Alternative	LR21, R26, A30, LR48, LR49, N53	NES would be a alternative option - could be more descriptive
95	Options/Alternative to PCE	N61	Another option not considered is legislation which enables regional government to deliver SOE reporting, audited by the PCE.
96	Options/Alternative to RMA	LR17	An alternative to the regulation developed under s 360 is a National Environmental Standard (NES). A regulation will need to be highly specific and, for example, will need to be site specific in relation to monitoring. An NES could be more descriptive and potentially more flexible by prescribing roles with the ability to make changes to variables or the locations monitored.
327	options/ costs and benefit	N61	As acknowledged in the discussion document, the magnitude of cost increases for local authorities will largely be determined by the extent to which the existing monitoring programs will need to be changed and the cost of any new monitoring measures. These costs need to be considered in light of the significant benefits of having a consistent national environmental monitoring framework and greater information about the state of the environment. These benefits include data to support the identification of environmental issues that may have otherwise gone undetected, greater information to inform national and regional policy and economic decisions, and the ability to address environmental issues and trends at an earlier stage
343	Options/ costs and benefit	A63	The cost of designing a national inventory or sampling system and actually collecting the data does not seem to have been included.
364	options/ costs and benefit	R68	current analysis substantially underestimates costs involved in transferring SOE reporting to PCE from MfE
373	options/ costs and benefit	R69	Cost of science teams. Benefits are improved data for designing interventions and mitigation where need to improve state of environment and for teaching in Universities and schools
295	Options/ costs and benefit	LR48	There are also a number of costs associated with the preferred options. The local authorities will require resourcing to collect data. Any changes to indicators and/or methodology may make existing baseline data obsolete. Greater Wellington will have to continue monitoring regional priorities as well as national priorities to identify and inform the management of any regionally specific problems.
265	options/ costs and benefit	O45	cost to regional councils will increase and it is envisaged some of this will be passed onto consent holders
217	options/ costs and benefit	LR35	For Option 2, the council considers that the following costs need to be explored prior to any legislative amendments: *Increased costs to regional councils and ratepayers. *Difficulties in achieving devolved policy-making on regional specific issues and needs. *Impacts on implementing recent national policy requirements (e.g. freshwater NPS and NZCPS). *Impacts on the content and timing of regional state of the environment reports. *The integrity of existing data sets where new or additional monitoring differs
159	options/ costs and benefit	R26	Costs associated with the PCE's office with regards five yearly reporting would be additional to current costs and staff numbers and capabilities would need to be appropriate. This could lead to inefficiencies and added costs though maintaining staff numbers in 'off' years. Mechanisms such as staff secondments to the PCE's office over the reporting period from other agencies such as CRIs, may be a potential option
160	options/ costs and benefit	R26	Costs associated with defining the national indicators and sampling framework would be a one off associated with developing an NES for environmental monitoring

Item number	Issue sub-theme	submitter number and sector code	Comments
18	Options Reporting	P5	The function of environment reporting is consistent with the Commissioner's role as an environmental overseer and auditor. While the word 'auditor' does not specifically appear in the Environment Act, this was clearly Parliament's intent when legislation establishing the role was passed in 1986. The auditing role is currently reflected in the Commissioner's functions of reviewing the environmental "system of agencies and processes", "investigating "the effectiveness of environmental planning and management", and investigating any matter where "the environment may be or has been adversely affected". A new function of reporting on the State of the Environment reporting would strengthen this auditing role. Reporting on the State of the Environment would also be consistent with the Commissioner's function of undertaking and encouraging "the collection and dissemination of information relating to the environment".
19	Options Reporting	P5	Talks about effects on the Commissioner's work, if she takes on reporting obligation - would not undermine her existing functions and powers. Issues raised include appropriation, environmental domains, timeliness.
20	Options Reporting	P5	This is a credible timeframe, although it will require empowering legislation to proceed promptly to allow sufficient time to prepare the first report in 2013.
37	options reporting frequency	A7	Forum suggests a three yearly review timed to review the government of the day's performance in a three year election cycle would best hold the Government to account.
58	Options Monitoring	LR14, LR15, LR16, LA17, LR21, LR23, LR35, R47, LR48, LR49, R51, A55, LR58, LR64, A67, LU74	Regional monitoring programmes may not be suitable for national purposes. Additionally significant effort is put into establishing regional monitoring programmes and this monitoring might need to be changed to meet national reporting requirements. More detail is required on what is proposed, including how data collection will be funded. Regional monitoring is undertaken to meet regional needs
134	Options preferred options	LR23	Narrow focus on legislative options which by themselves, are unlikely to deliver the reform necessary
135	Options preferred options	LR23	concerned the outcomes are pre-conceived. Need a whole system approach, not just part that related to PCE or local government
311	options preferred option	A56, O65, R68, N72	The proposal to have the Parliamentary Commissioner for the Environment (PCE) responsible for environmental reporting is, however, not supported, chiefly because capability and capacity to do the job would have to be built largely from scratch. As well, the skills and resources required for the task already reside elsewhere. Should be Stats NZ instead
323	options preferred options	NG1	EDS does not consider Stats NZ has the necessary expertise to report on SOE
141	Options PCE	LR23	Oppose PCE being given explicit role to scope and provide 5-yearly national SOE report. Is at odds with PCE current role. Councils questions if resourcing required for reporting is appreciated. PCE might cherry-pick what to report on
144	Options RMA	LR23	Needs to be proper CBA to determine cost to councils to align or redesign regional monitoring programmes. If current regional monitoring is seriously inconsistent with national level monitoring will take serious additional resourcing to fix
94	Options RMA	LA17, R51	The preferred option identifies the need to improve consistency at the local level, and as identified earlier, local and regional programmes must deliver on local and regional needs. Compromising this for national level objectives is counter intuitive. Identification of the national level monitoring is first and foremost required, how this is developed to avoid duplication at the local and regional levels is part of the national level collaboration.
121	options	LR21, LU25, A43	support establishment of Advisory Committee to support PCE in preparing report. Successfully used in Australia
131	options	LR23	concerned with failure of discussion document to adopt a whole of system approach to deliver nationally robust environmental monitoring and reporting
23	options	A6	Q 9: We note the comments on page 5 of the discussion document and agree a "one agency" approach is likely to bring positive national benefits, albeit with some uncertainty on regional/local cost impacts at this stage.
153	options	R26	legislation will be required to achieve robust monitoring and reporting framework given current make up of national and local government agencies and inconsistencies in monitoring systems
158	options	R26	Giving the PCE the responsibility to regularly prepare a report meets the 'perceived independence test' as the PCE office would be compiling and analysing statistics from MfE and local government sources. They would certainly be able to 'tell it like it is'. However a review of international state of the environment reporting shows that not all SOE reports are produced by independent third parties as proposed here, some are produced within Ministries. So it would be interesting to further explore whether perception is reality in terms of independence in NZ. If all that is being reported is 'state' i.e. data and information without associated interpretation value judgments then reporting within a Ministry should be appropriate. If there is a layer of value judgments and interpretations drawn from the data then this is more appropriate for the PCE
168	options	R27	the options address the "identified" problems
236	options	A38	concerned a potential conflict may arise where by requests for the types of data sought by the Parliamentary Commissioner are not supported by recommendations from the Minister for the Environment to adjust the reporting requirements of Regional Councils. This could leave the way open for actual or perceived political manipulation of the SOE reporting structure. If financial (cost saving) or other political motivations. We believe this potential issue must be addressed. Alternatively the SOE must be empowered to specify the type and level of monitoring to be implemented
246	Options	CG41	The Ministry of Health supports the proposed legislative requirements to enable independent state of the environment reporting
257	options	A43	Options assessed are too narrow and focused on independence. This has skewed the options
272	options	O46	Number of councils have participated in Quality of Life Reports (www.bigcities.govt.nz) and would seem natural for this to be linked with proposed reporting
273	options problems	O46	It also fails to draw another set of linkages of which perhaps the most significant is the type of reporting embodied in the Government Statistician's report "Measuring New Zealand's Progress Using a Sustainable Development Approach, 2008" (www.stats.govt.nz/browse_for_stats/environment/sustainable_development/sustainabledevelopment.aspx). Subsequently, the Australian Bureau of Statistics published in September 2010 its feature article "Future directions for measuring Australia's progress" (http://www.abs.gov.au/ausstats/abs@.nsf/lookupby-subject/1370.0-2010-Chapter%20MAP-downloads%28%29) which provides another illustration of joining together environmental data and reporting it with other information. By implication these two documents seem point to the good sense in having the data available within a single entity e.g. a datasets which can reasonably easily be used for cross-cutting analysis.
97	Options address problem	LA17	Insofar as a national level of reporting is required, the option of mandating the Parliamentary Commissioner for the Environment appears to address the reporting issue
123	Options address problem	R8	the problems with each option appear to be well identified.
216	Options address problem	LR21 LR35	The option to amend the Environment Act to require the Parliamentary Commissioner for the Environment to produce a state of the environment report every five years seems appropriate to address the associated issue. The council is not convinced however with regard to issue 9 that differences in regional environmental monitoring create difficulties in producing a "satisfactory national picture of government quality" nor is it comfortable with the option to address it. Without a detailed understanding of the second issue it is difficult to fully assess the proposed options to address it. Even if a better description of the issue was included, it is difficult to assess the preferred option to address it in absence of a reasonably robust cost-benefit analysis.
316	options address problem	A59	The Society considers that the report has clearly identified many of the issues related to the current SOE reporting. The extent to which SOE reporting will provide capacity to make a real environmental difference in the case that issues are identified, however, remains uncertain. Such actions may include additional monitoring but more importantly, where negative trends are apparent, actions taken to address the source of the problem and to rectify it. In this case the issue becomes one of interactions with the National Policy Statements. The fact that the NPS in Freshwater Management may allow some regional councils up until 2030 to put in place an adequate monitoring framework (let alone lead to an enforcement obligation) is cause for concern.
326	options address problem	NE1	The options will largely address the problems identified in the discussion document. It is important that the regulation or national environmental standard that prescribes the aspects of the environment to be monitored is sufficiently detailed and is designed to measure those aspects that will demonstrate key environmental trends and enable timely management responses to be implemented. The monitoring of certain indicators can indirectly measure other possible indicators. There needs to be adequate input from scientists about these matters and the key aspects of the environment that should be monitored. Further measures will be required to address the resourcing issue as discussed above.
363	options address problem	R68	Submission contains detailed tables assessing how options address the problems. Preferences are Stats NZ option instead of PCE and not clear preference for RMA amendment option
372	options address problem	R69	Option partially address problems. Report can only be prepared by experienced science teams
405	options Alternative	OT6	We would be concerned about the extent to which those agencies made responsible for the proposed new monitoring and reporting requirements actually did the job, and hence how they themselves would be monitored to make sure they are doing what will be expected of them. In this regard there may be justification to establish a small environmental reporting governance body to comparatively monitor council implementation and report regularly to the Minister, especially during the early stages of its establishment. While there might be an innate resistance to another body being established for this purpose the discussion paper actually notes the need, and then favours the Ministry over the PCE. Given that the Ministry has not been particularly successful to date in leading regional and district council environmental performance the Ministry either needs additional coercive powers to require council performance in this area or the suggested governance body with a specific oversight and regular reporting function to the Minister.

169	options costs and benefit	R27	The preferred option 1 would have an increased cost associated with as PCE are not currently staffed to carry out this role and if MFE were to continue collecting and analysing environmental information they would also need to retain staff to do this
180	options costs and benefit	A29	The duplication of effort by separate agencies in collecting and collating environmental statistics could give rise to duplication in activities and conflicting information. This risk will be high if reporting is by the Parliamentary Commissioner operating outside the Official Statistics system.
187	Options costs and benefit	A30	councils may find it difficult to resource and fund collection of data to standard and consistency necessary
38	Options costs and benefit	A7	The discussion document does not identify the benefits to industry which would result from this proposed legislation.
98	Options costs and benefit	L/A17	The value of SOE monitoring and reporting is not clearly identified and there is a lack of context to show the benefit of reporting at a national level. This is partly because the objective of the reporting has not been identified as discussed earlier. There will be costs associated with the preferred options: <ul style="list-style-type: none"> • how will councils be resourced to collect data to the standard and consistency prescribed at the number of sites prescribed? • if funding is not targeted then local and regional priorities are likely to trump national priorities. • if a change in methodology is prescribed then there will be an associated cost. This will need to be minimised. Care will also be needed to ensure that changes to methodology does not render
124	options costs and benefit	LR21	provides detailed list of possible costs and benefits including costs: resourcing and funding data collection; prioritising work, need for a separate targeted funding stream, cost to council to apply official statistics system principles and protocols; Benefits: councils may recover some costs via s36 RMA, greater opportunity for multiple use of stats for regional and national purposes, can include specifications in consent conditions to enable costs effective data gathering, helps ensure data collection skills are retained in councils.
46	Options costs and benefit	R8	It is plain that the cost of misreporting (either through malicious or accidental means) will cost the nation more in the long term, as problems do compound to become insurmountable, if not dealt with early enough.
84	options costs and benefit	LT16	value of SOE monitoring and reporting not clearly identified
24	Options highest net benefit	A6	Q.10: Notwithstanding the uncertainty noted above, it is likely the independent PCE option would deliver the highest level of net benefit.
99	Options highest net benefit	L/A17	The preferred option seems to align best with the existing duties of the Parliamentary Commissioner for the Environment. However, without being able to accurately determine the costs associated with the different options (because we do not know the variables within each domain) it is not possible to assess which option would deliver the highest level of net benefit.
285	options highest net benefit	R47	requiring monitoring will have greater net benefit to NZ
258	options highest net benefit	A43	BusinessNZ considers that if the broader set of quality-related characteristics was taken into account, the Ministry for the Environment option for environmental reporting (under a legislative mandate) would be most likely to deliver the highest net-public benefit.
279	options	R47, A62	suggest a standalone Environmental Reporting Act rather than amending existing Acts to increase visibility and profile of environmental monitoring and reporting
284	options	R47	Cost of environmental science to underpin this work and design a robust monitoring and reporting framework
294	Options	LR48	preferred option does not address aim of providing consistent, independent, national-level SOE report
374	options	R69	The PCE office would struggle to prepare a comprehensive and accurate state of the environment report, if the PCE office was funded to do environmental reporting it would need to expand and consume funding that could be used to support scientists in GRIs.
389	options	LU71	many of the standard approaches to environmental monitoring have arisen through innovation by local authorities. Regulation increases risk this innovation will be replaced by regulation-led, minimalist approach to monitoring, identifying issues and addressing environmental issues.
390	options	LT73	status quo cannot be seen as cost efficient option because does not produce high quality environmental statistics (see Table 2 pg 19)
404	options	O76	Conditionally, in relation to how best to achieve high quality environmental statistics. We think it would be important for the Auditor General to have a specific direction from government to monitor and report annually upon the performance of regional and district councils in terms of their compliance with the final new environmental monitoring and reporting requirements established by the proposed new Act

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Item number	Issue	Sub-theme	Submitter number and sector code	Comments
274	Reporting	Alternative methods for analysis	O46	PCE role would be compromised so suggesting alternative option of government statistician provide guidelines to PCE on data gathering methodologies and analysis which include matauranga Maori. Also PCE must have a strong Maori Unit to ensure matauranga Maori is incorporated
54	Reporting	Methods for analysis	113	could use pressure-state-response model to report of sustainability frameworks such as resources/processes/outcomes framework
239	Reporting	Methods for analysis	R39	In relation to consistency, while there might need to be a set of factors and associated means of studying them (how, when, by whom etc.) applied across the country, unique regional factors, or factors that apply in some and not other regions might also be needed. For instance, on the east of the country (drier, sunnier etc.) there might be great need to study some things that are not relevant in the west. Or maybe this is a difference in intensity of monitoring rather than missing plots in some regions. Phosphorus and nitrogen levels in water important in some areas, but not in others
4	Reporting	Other	O2, LR49	Aggregation and publication of data on compliance with consent conditions for water discharges would be a valuable addition to New Zealand's reporting regime. It would assist in managing perceptions of political interference in environmental reporting at a regional level, as is occurring at present with decisions on prosecutions for breaches of consent conditions
30	Reporting	Other	A6	recommends expediting the amendment to the Environment Act 1986 given the upcoming 2017 OECD environmental performance review of NZ so an independent SOE can be published prior
59	Reporting		LR15	Agrees PCE should be free to choose data sets and indicators to use
288	Reporting		LR48	how will PCE request changes to the regulations to obtain the data she needs? Not clear how this will work in practice
290	Reporting		LR48	State of the Environmental reporting should be associated with plans, policies and regulations that will directly address any identified environmental problems as well as identifying where it is possible to increase the resilience and biodiversity of natural ecosystems to mitigate for the potential effects of a changing world (e.g., increasing human population, greater environmental variability and climate change)
317	Reporting		A59	if Monitoring Programs are mandatory, there should be a requirement to report on trends over the past medium term. That should mean we avoid having the same environmental problems recurring at 10, 20 and 40 year intervals. We keep reinventing the wheel and its time this stopped and our environmental management prevents degradation of ecosystems and particularly resource degradation
52	Reporting	Reporting frequency	PF12	Statutorily required five-yearly reporting would be a vast improvement on the current situation. However there would be operational and political benefit in the reporting period fitting with the parliamentary cycle so that each government carried an ongoing and regular level of responsibility for national level environmental performance management. A substantive report in the middle year of the central government electoral triennium would sharpen responsibility and public accountability, and better inform the inevitable and ongoing environmental debate that is destined to become a feature of the public interest. It would also enable each government to amend policy from an equally informed position. If this was likely to be too onerous then the reporting process could perhaps be partitioned into interim three yearly reports and substantive six yearly reports. Some domains may well lend themselves to the shorter reporting period more so than others. But the important point here is to cause each successive government to be equally informed and routinely responsible for receiving and acting upon state of the environment reporting and subsequent environmental management. The role of the Auditor General also needs to be
395	Reporting	Timeframes	N72	Statistics New Zealand provides an 'Annual Regional Report Card', based on the data returned from local authorities. These annual reports would form the basis of the five year reports (see Recommendation 4) and would also act as a basis for other Statistics New Zealand's Reports, such as <i>Measuring New Zealand's Progress Using a Sustainable Development Approach: 2008</i> . The 'Annual Regional Report Card' would not only let New Zealanders know performance in their region, but also (i) how their region compares over time and (ii) how it compares with other regions.
366	Reporting	Timeframes	R68	need to monitor so can detect whether or not certain trends, strategies and policies might lead to undesirable or irreversible outcomes and what causes those changes. Monitoring for outcomes becomes an imperative
14	Reporting	Timeframes	P5	Three recommendations were made in PCE report "How clean is NZ? Measuring and reporting on the health of our environment" on improving environmental data and the system for environmental reporting. These were that reporting should be done on a regular basis, that environmental indicators should be regularly reviewed, and that there is a need for independence in who does the reporting - proposal is a significant development towards progressing these recommendations
126	Reporting	Timeframes	LR11	Hauraki Gulf SOE reporting should be synchronised with national reporting (currently 3 years)
109	Reporting	Timeframes	N19	could consider more frequent reporting sometime in the future (assuming it is cost effective)
85	Reporting	Timeframes	LT16, L/A17	Trends in environmental indicators can occur over longer timeframes, consideration should be given as to what indicators are useful at the 5 yearly intervals as opposed to a longer duration. For example reporting on vegetation state and use change may not be adequately reflected in a time period such as five years. Clearly the frequency of reporting will be in part identified through the objectives that are identified
162	Reporting	Timeframes	R26	However new technologies both for data monitoring with sensors and for analysis and representation of data mean that it is becoming increasingly feasible to do near real time reporting for some indicators and there are examples of such monitoring systems internationally. The Canadian Forest Service has been investigating ongoing reporting approaches, with indicators reported separately on different timelines to give a more dynamic view of the environment. This approach, which leads to a smoother workflow with less intense peaks. More work is recommended to evaluate reporting timelines
334	Reporting	pros and cons	A62	if the role of producing a state of the environment report is ultimately assigned to the Parliamentary Commissioner for the Environment then the necessary amendments to the Environment Act 1986 should: a. provide explicit direction on the impartiality of the report and its basis in sound science; b. make it clear that the new responsibility is separate from any aspect of the Environment Act or the Commissioner's functions which could be construed as an element of advocacy; c. ensure that relevant sections of the Act (e.g. the long title; definition of 'environment' in section 24; matters to which regard to be given *section 174; include the economic and social needs of the country along with such matters as 'intrinsic values of the environment')
400	Reporting	pros and cons	LU74	Pro: Using the Parliamentary Commissioner for the Environment brings a good level of independence to the process. Are some advantages at a national level to minimise duplication and ensure consistency in terms of monitoring and data collection services. Cons: Unclear PCE will have resources to undertake such actions without undermining existing role, could be significant costs for local level
365	Reporting	pros and cons	R88	The pros of the proposed amendment are: - mandating reduction in an SOE report. *outlining a minimum set of environmental domains to cover but leaving open the possibility to include others.
375	Reporting	pros and cons	R69	This cannot be left to the PCE of the day to decide what to report on. Comprehensive reports on all internationally recognised domains should be regularly reported on by the expert hands of CRI and University science teams, that liaise with regional council staff who are doing the monitoring
304	Reporting	pros and cons	N53	There are some misgivings that if such an 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 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.
247	Reporting	pros and cons	CG41	Legislation will assist in delivering an improvement in the quality and consistency of environmental data and reporting. However investment will be necessary to ensure that robust criteria are developed to assist in the development of indicators and monitoring networks that are suitable for national state of the environment reporting and are compatible with other reporting regimes such as the Ministry of Health's environmental health indicators programme.
170	Reporting	pros and cons	R27, R52, A68	Cons - there would potentially be some duplication of work by PCE and MfE and there would need to be more staff overall working in the area
181	Reporting	pros and cons	R27	When implementing the proposed new roles and responsibilities for the Parliamentary Commissioner, it may take several years to establish a smooth, efficient systems for consistent operation and delivery, and results are not likely to provide any significant practical advantage over strengthening the national consistency of existing monitoring and reporting systems. The option of using the PCE will introduce it to an operational function and undermine the current role of PCE
188	Reporting	pros and cons	A30	Pro: Using the Parliamentary Commissioner for the Environment brings a good level of independence to the process. The Parliamentary Commissioner for the Environment will need to be adequately resourced to undertake this work. Cons: Significant changes to some monitoring networks, if required by a s360 regulation it is difficult to modify monitoring networks or measured parameters in an adaptive management approach based on the collected data. The specific monitoring details as set at a national level may not be based on appropriate regional information. There needs to be considerable regional input before specifying in a regulation: variables, site locations, monitoring frequency, monitoring standards and by whom
193	Reporting	pros and cons	A31	Pros: Role clarification with the Parliamentary Commissioner for the Environment having responsibility for the state of the environment reporting - improved independence of state of the environment reporting, particularly as a result of the Parliamentary Commissioner for the Environment interpreting and analysing data, preparing reports and making recommendations Better mandatory data provision by regional councils and others. Regular, consistent reporting on the state of the environment. Cons: Increased costs of running the office of the Parliamentary Commissioner for the Environment, given its increased role, including increased resourcing competent staff to ensure reporting is robust and defensible - Potential need for the Parliamentary Commissioner for the Environment to establish new relationships with other agencies (e.g. regional councils and the Ministry of Fisheries (now in the Ministry of Agriculture and Forestry) to be able to obtain the data it needs for state of the environment reporting. We are unclear as to whether data from regional councils will be provided (a) direct to the Parliamentary Commissioner for the Environment or (b) to the Ministry for the Environment, with the Ministry then passing it to the Parliamentary Commissioner for the Environment
204	Reporting	pros and cons	A33	Pros One clear lead; Cons No clear roles for other agencies or the process for engagement and efficiency of effort, or data management
218	Reporting	pros and cons	LR35	independent regular national state of the environment reporting will provide an evidential basis for New Zealand's environmental credentials and could meet international reporting requirements. It could, depending on the indicators and data assembled, also allow for the identification of national environmental trends and emerging issues. This should support national environmental policy-making
100	Reporting	pros and cons	L/A17	While the role of PCE has the potential to bring independence to the process, the costs falling to the local government sector could be substantial if the councils are required to collect additional information and via different methodologies and additional sites.

108	Reportini/ pros and cons	N19, R26, A31, A36, R37, A38, CG41, LR48, R51, A59, O60, N61, O70, LU71, LU74, LR21	any risk of PCE not being properly funded or resourced will need to be addressed to ensure other crucial functions of PCE are not compromised
125	Reportini/ pros and cons	LR21	Pros - brings independence; cons - unclear PCE has resources to do the job without undermining existing roles, PCE could be constrained to reporting on selected data that has been supplied, could be significant cost for local govt to collect data that is different to what already collect. PCE needs to be involved in design of monitoring programme
161	Reportini/ pros and cons	R26	Locating the reporting activity within the office of the PCE and the statistics gathering activities within MfE could lead to fragmentation of activity and a lowering of critical staffing levels within the Ministry which could have an adverse impact on its role under the Environment Act 'in formulating advice to the Government on environmental policies'
78	Reportini/ pros and cons	LT16, LR64	It is also likely the PCE will be subject to pressure to report on a range of matters from different sectors of the population. It is MfE which has control of the regulation making power (not PCE) and it is likely to be councils which will be responsible for collecting the data. There is no ability for the PCE to require MfE to do something so it is unclear how this will work in practice.
74	Reportini/ pros and cons	LT16, LA17	The Parliamentary Commissioner for the Environment has no regulatory capacity to generate data. It is therefore assumed that it will be entirely dependant on MfE for this (or will proposed changes to the Environment Act cover this?). The Parliamentary Commissioner would have to request that a regulation is developed to require the collection of data and it is unclear what process will be required when changes are required to the specific variables. Will the regulation need to be amended?
25	Reportini/ pros and cons	A6	Q.11: With the additions we propose in Q.13, we see only pros in amendment of the Environment Act.
67	Reportini/ pros and cons	LR15	com might be capacity of PCE's office to undertake reporting function
396	Reportini/ Domains	N72	That domains are left to the EPA, Statistics New Zealand and other interested parties to develop in consultation with the public; however, if there is a desire to tighten this up in legislation, we recommend adopting the domains the Institute developed for its Report 10, these are Land, Mineral Production, Energy, Water Resource, Fisheries and Aquaculture, Biodiversity, Forestry, Livestock and Crops, Atmosphere, Water Quality and Soil
344	Reportini/ Domains	A63	There are problems with too much specificity in what comprises "the environment" in that it is easy to overlook some factors that might be, or might become very significant to the New Zealand brand. Just looking at the list for example, where would forests (and other vegetation) fit? Are they part of land or part of biodiversity? An option that we would support is for a broad spectrum of criteria / sectors / etc., to be included and that they are disclosed and debated ahead of any reporting period. This might include circulation of a synopsis of the criteria to be included in the report being published for comment a year ahead of the start of the reporting period. The purpose would be to ensure appropriate focus of environmental issues of the day, recognising that these can change over time. The final decision as to the criteria to be assessed would rest with the entity responsible for the report (e.g. the PCE), which would need to balance currency of issues covered with the value of comparative data over time.
356	Reportini/ Domains	A67	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.
289	Reportini/ Domains	LR48	Considers focus of domains is too narrow. Previous SOE report had 10 domains and OECD uses 13. Domains should be widened to be consistent with OECD. Also need to recognise social, cultural and economic components and use pressure-state-response framework. Also oceans is too broad and should be split into 'estuaries, harbours and coasts' and 'oceans'
219	Reportini/ Domains	LR35	'biodiversity' should be disestablished as a standalone domain and included within the fresh water, land, and oceans domains. This is consistent with an ecosystems approach and allows for better illustration of pressures and interrelated states. The council also submits that 'oceans' should be split into 'coastal marine' and 'oceans' as the environments are different and subject to different pressures. The council notes that in taking a biophysical / ecological approach to monitoring and reporting that the wider environment as defined in the RNA is not being taken "holistically"
106	Reportini/ Domains	N9	Provides lots of info on why should monitor and report on wilding conifers
77	Reportini/ domains	LT16, LA17, LT10	Not enough information provided to comment e.g. what might fall under "Land"?
114	Reportini/ Domains	LR21	contribution of iwi to resource management is increasing following Treaty settlements. Info collected and reported needs to provide a national picture that is also relevant to this unique dimension
142	Reportini/ Domains	LR23	Domains listed is very limited list. Implication is there must be two reports - one from PCE on domains listed and once from MfE or others on other things
143	Reportini/ Domains	LR23	concerned at suggestion PCE would determine exact variables as shows lack of appreciation of what is required to deliver SOE report and monitoring
68	Reportini/ Domains	LR15	more detail required to comment. How will they relate to other OECD member countries SOE programmes for Stats work
39	Reportini/ domains	A7	There is no specific mention of waste and this needs to be clearly specified. Without understanding the total amount of waste by product type currently being processed, reduction targets cannot be set. It would also be beneficial if technical authorities report on the cost of landfill in their region which will enable a cost benefit analysis to be done of the benefit of diverting waste from landfill
47	Reportini/ Domains	R8	Provides huge amount of information on why coastal environments should be included and what should be measured
50	Reportini/ Domains	PF12	A recent workshop organized by the Royal Society of New Zealand on August 9, 2011 identified that an Ecosystem Service approach helps to identify and quantify the ecological and socio-economic trade-offs and synergies on which decision-making should be based. (Costanza R et al "The value of the world's ecosystem services and natural capital" Nature 1997 V.387 p.253-260). The focus for environmental reporting should be our ecosystems.
51	Reportini/ Domains	PF12	Monitoring programs serve distinct purposes 1) a measure of degradation 2) compliance and 3) an early warning system. Data collected for only one purpose is unlikely to be the most suitable for a national purpose. Complicating monitoring programs is the fact that our ecosystems are constantly changing and evolving without the help of humans. We are a young dynamic country and identifying the best indicators is a challenge. Each region has representative ecosystems and many have historical data. It is possible in many cases to report on environmental health of a region and to identify trends. A variation index for representative ecosystems would enable a national picture of environmental change to be evaluated and reported
26	Reportini/ Domains	A6	Q.13: Within the water and ocean domains we suggest compliance with consented point source discharge conditions be included in the legislative requirements. We discuss this in the other beliefs
5	Reportini/ Domains	O2	Assuming this is native biodiversity, perhaps we should have a responsibility to monitor exotic biodiversity that might be covered by IUCN concerns, or covered by Conservation on Biological Diversity because threatened in the wild in home country.
12	Reportini/ Domains	R/G4	Biodiversity very important, as are other 4 agreed domains
1	Reportini/ Maori	11	I wish to recommend Maori components to be incorporated into the summary of submissions and the proposed environmental reporting bill draft to be presented to the minister. Recommended components to be: Maori environmental monitoring is a necessary activity to be included in the environmental reporting bill; Maori environmental monitoring is a prerequisite for sustainability of Taonga (Biodiversity resources). Key recommendations within the Wai 262 Report 2011 specific to Maori, and sustainability of taonga should be included in the summary and proposed bill draft.

Issue number	sub-theme	submitter number and sector code	Comments
7	Monitoring and reporting	L13	appears to be a gap in the document about how this collection of local information will transfer to a National State of the Environment Programme.
8	Monitoring and reporting	L13	cost is collected to inform local or regional level, not national
9	Monitoring and reporting	L13	cost of obtaining any new national information needs to be considered in context of cost and usefulness of the information
10	Monitoring and reporting	L13	Inappropriate to merely transfer duties and costs of national reporting to local government
48	Monitoring Obtaining data	PF12	Monitoring data is the difficult area. Monitoring gathered on a national basis can tell the world about the degradation, pollution or clean and green state of our air, land and water. It checks on compliance. Monitoring ought to also be able to constitute an early warning system so we identify unfavourable ecosystem change BEFORE it becomes a problem. This will depend on identifying key indicators. During my term of Office there were scientists who could tell us the first species that recognised a recovering ecosystem but they could NOT tell us what were the first species to disappear.
49	Monitoring Obtaining data	PF12	Landcare, coastcare and water care groups with the help of scientists and Local Government identified key indicator species for early warning signs of unacceptable change and some of these are used by Local Government today. However what is appropriate for one region is not for another area. Seeking to standardize indicator species nationwide is NOT a good idea.
53	Monitoring Obtaining data	I13	use NES instead of amending s360 of RMA?
56	Monitoring data collection	I13	involved tangata whenua in development of environmental indicator and monitoring
17	Monitoring data collection	P5	The Ministry currently has a substantial project on its work programme relating to the monitoring and reporting of freshwater, with implementation of changes potentially from July 2012. There is a question as to how fast this should be progressed when the function of who is to undertake State of the Environment reporting is under active discussion. PCE may wish to provide advice on best practices for standardized freshwater data.
15	Monitoring data collection	P5	A state of the environment report is one use of environmental data and must be distinguished from collection of data for other purposes e.g. environmental policy
40	Monitoring funding for data	A7	Agree that data is required to put a monetary value on New Zealand's clean green image. Local authorities are allocated funds from the Waste Minimisation Fund to manage waste minimisation and will therefore have funding available to collate this data
328	Monitoring problems	N61	One potential problem with the proposed RMA amendment is that the public and stakeholders may not be afforded the opportunity to participate in the development of regulations, whereas the development of a national environmental standard sets out a clear process for public and iwi involvement. Conversely, a regulation may allow greater flexibility to amend the monitoring requirements if it is considered that a different aspect of the environment should be monitored.
345	Monitoring problems	A63	The RMA in practice has resulted in a focus on the local and the short term. There is a risk that the local and short term determination of the 'significance' of adverse effects by Regional Councils may overlook accumulative and national scale problems. Nationally significant environmental criteria such as non-point source nitrate accumulation and or progressive loss of biodiversity may not be monitored because they are not perceived as a significant issue.
171	Monitoring problems	R27	The scale of the problem is huge (and should not be underestimated) and the impact of making this change will be huge (and this should not be underestimated either). It will take several years for councils to phase in changes i.e. some have long term contracts with laboratories that will not be easily terminated.
172	Monitoring problems	R27	All the areas highlighted as being specified under the reg are to do with monitoring but it is much more than this. For example, it is laboratory testing (right down to detection limits on tests), QA/QC of fieldwork (monitoring), lab testing and data entry, data storage.
182	Monitoring problems	A29	The proposed amendment to the functions of the Parliamentary Commissioner for the Environment is not the cheapest and most efficient option to achieve consistent national level monitoring and reporting. The proposal to extend the regulation making powers under section 360 (Regulations) of the RMA to require local authorities to monitor certain variables of the environment (following specified methodologies and monitoring sites) to improve the consistency of state of the environment monitoring statistics at a national level, appears to be a reasonable process with which to achieve the objectives, and can be achieved most readily by strengthening existing systems. If the standardised methodologies and measuring sites are not well considered and agreed by all local authorities, there may be a risk that some important local issues will cease to be monitored and reported on. If the monitoring and reporting does not allow New Zealand to be benchmarked against international trading partners and trade competitors, then one key advantage of nationally consistent report will be lost.
189	Monitoring problems	A30	It is useful to provide the Parliamentary Commissioner for the Environment flexibility on any additional domains they seek to report on. There is some concern that the exact variables are not specified, there should be a minimum specific set that are required to be reported on and then provide flexibility to included others as the Parliamentary Commissioner for the Environment determines. This will remove the concern that councils and agencies are collecting data that may not be reported on.
206	Monitoring problems	A33	* Good coverage of inconsistencies in regional environmental monitoring programmes identified (p13) but these do not need to be detailed in legislation. This is far too prescriptive and will be difficult if not impossible to achieve. * Instead we suggest that the legislation has that monitoring will be based on environmental standards and protocols e.g. National Ecosystem Monitoring Protocol. Where national standardised methods can be used – they should be. * Suggest requirements for PCE to develop national documents standards and protocols. These need to be based on pressure, state and response information. * Currently the focus of the Bill appears to be primarily reporting of "state" indicators. Pressure and response data is important to link the findings to targeted and improved management. * The reporting requires peer reviewing. * Databases data management and data sharing also an issue at a both local, regional and national level. * Suggest more of a focus on setting up a good process for achieving reporting requirements. * Need to identify gaps in National Environmental Standards and monitoring protocols. Develop these at a national level.
222	Monitoring problems	A36, R37, O45	Resourcing of agencies e.g. regional councils with limited capacity is needed. They need resources to undertake standard agreed monitoring of key indicators, e.g. changes in land use, wetlands, lowland forests, indigenous vegetation and habitat loss
229	Monitoring problems	R37	Some ecosystem types currently not monitored due to lack of research to provide basis for monitoring and methodologies and difficulty accessing resource to measure it
127	Monitoring problems	LR21	use of s360 RMA is appropriate, experimental design for collection and analysis of data to support SOE reporting should be clearly defined in s360 RMA, collection of data by other parties should be factored into RMA amendment, protocols for data management should be defined, MIE requires all data to be made openly available under "declaration on open and transparent government" and "NZ data and information management principles"
86	monitoring domains	LT16	Without a clear articulation of the objectives for each domain and identification of the variable/indicator to be measured we are not in a position to prioritise. There are also relationships between domains which may require multi-criteria prioritising i.e. it is not simply a case of prioritising a domain but rather inter and intra relationships need to be considered.
368	Monitoring Domains	R68	Rather than prioritise one over another, we recommend: a) prioritising data and indicators in each domain. b) outlining a process for improvements and consistency considering all domains such that some progress is made on each domain over time.
346	Monitoring Domains	A63	The NZIE does not support progressive introduction of sectors to national reporting. A progressive approach cannot logically represent national data for the period the full set of monitoring is not undertaken. A progressive approach also has the risk of mandating a differentially costly or punitive obligation on a sector (say forestry) that is relatively more benign simply because it has already collected the data of interest. A progressive approach may also discourage a focus on 'hard issues', on the basis that adequate monitoring is occurring of those things that are more easily quantified and addressed.
110	Monitoring Domains	N19	It is just as important to get the right measures for each domain (e.g. what to measure within freshwater domain). Therefore need to further consult on measures
115	Monitoring Domains	LR21	Which monitoring framework will be used? Pressure-state-response? DPSIR? Driving-force-pressure-state-impact-response? Also lots of discussion on how should be monitored (e.g. forward looking)
116	Monitoring Domains	LR21	chairs govt needs to take the lead (1) developing a consistent method of reporting this information that can be applied to whole country, (2) assisting less well-resourced regions to obtain info on water quality and ecology (3) assist all parties collecting data to make that data easily available and interoperable
117	Monitoring Domains	LR21	legislative amendments should require development of an agreed overarching framework that includes who will do what, how it will be collected and why and how it will be analysed, including reference to principles of open data and open and transparent government
128	Monitoring domains	LR21	PCE provided criteria for priority in 28 August 2008 report "SOE: prioritising environmental challenges - what matters most?" (cumulative, irreversibility, scale and extent, rate of increase, limits or tipping points)
13	Monitoring Domains	R/G4	Provides huge amount of information on monitoring biodiversity - suggest using Plant-SVMZ system
16	Monitoring Domains	P5	In order to report independently, the Commissioner must not only be free to choose the data sets to use, but also be free to choose which indicators are best for diagnosing the state of different domains of the environment. Specifying domains is not consistent with the Environment Act
80	Monitoring costs and bene	LT16, L/A17	FNDC is opposed to the proposed Environmental Reporting Bill expanding the regulation making power under section 360 of the RMA until: (a) there has been a proper cost benefit analysis to determine the cost to local government to align or develop monitoring programmes to support national reporting requirements; and (b) there has been meaningful dialogue on how any new or additional costs should be offset
101	Monitoring Alternative to R	L/A17	Consideration is needed as to whether changes to s30 and s31 are required to accompany changes to s360. As discussed earlier – consideration should be given as to whether an NES is more appropriate for the actual standard. We accept that a s360 regulation is probably unaffordable, rewording method and process
130	Monitoring pros and cons	LU22, LU25, O45	councils monitoring and reporting regime has been specifically designed to meet requirements of s35 of RMA - could create confusion if not amended
152	Monitoring Monitoring	R26	Has an environment monitoring programme focused on developing indicators for water, biodiversity and erosion of planted forests
21	Monitoring	A6	We have noted previously, as have others, that in reference to water issues the highly evolved and fragmented delivery system is resulting in a growing level of unintended consequences, not least in developing a nationally consistent and comprehensive set of indicators in reference to water quality.
6	Monitoring	LT3, LT16, LT11	Lack of clarity about impact of the initiative on Territorial Authorities. Some TA's also collect data eg waste, biodiversity.

60	Monitoring	LR15, LR21, LR23, O46	National state of environment reporting is not directed by RMA. Ecan supports national network of monitoring sites but submits regulations should not (1) impinge upon RMA s 35, 62 and 79 and monitoring directed by Local Govt Act, and should not shift local authority monitoring away from its intended purpose (2) impose unreasonable costs on rate payers without opportunity to consult them (3) require variables that are not driven by local authority functions and monitoring needs
61	Monitoring	LR15, LT16, L/A17, LU22, LR23, LU25, A33, LR35, R37, CG41, O46, LR48, LU71, LU74	Need to regulate more than local authority monitoring if a satisfactory national picture is to be developed (i.e. data is also collected by others). i.e. take a whole of system approach
73	Monitoring	LT16, L/A17	As the provision of data for national reporting is a new responsibility and function for councils this needs to be addressed as the reporting framework is developed. Does the Act need to be amended (section 31 is relevant to FNDC) in addition to s360 – the regulation making power? If section 31 is not amended the regulation(s) to be developed may not be underpinned to the body of the Act. This very important area has not been addressed in the discussion document and without reasonable information about likely variables the full implications for this council are impossible to determine. We suggest that a benefit cost analysis would be a pre-requisite to developing any new legislation much less standardised reporting.
75	Monitoring	LT16, L/A17, LR21, LR23, LU25, LR35, R37, LR48, R51, A55, LR64, LU74	National Environmental Standards require some level of consistency in measurement and data collection e.g. freshwater quality. There is also a level of collaboration and consistency in monitoring of biodiversity. Any future framework needs to capture work already underway and not undermine or duplicate it. In the past councils worked with MfE on the Environmental Performance Indicators Programme (1996 - 1998); and Environmental Information Sharing Protocols, including the development of national indicators and the implementation of the start of monitoring for national reporting purposes (2003). This work was abandoned by the Ministry.
76	Monitoring	LT16	Is there any further intention to develop national indicators? Is there a role for culturally based environmental monitoring?
90	Monitoring	L/A17	Recognition is needed that councils already collect a significant amount of environmental data that can and has been utilised for national reporting purposes. There may be opportunities to build on existing programmes to better contribute to national reporting requirements but because national monitoring is not a function of local government a critical question is how will it be funded if there are requirements for data over and above existing programmes?
92	Monitoring	L/A17, LR21	Central and local government have a number of other monitoring and reporting requirements including: consent and compliance, National Policy Statement and National Environmental Standards, community outcomes (Local Government Act), Transport (Land Transport Management Act) and Biosecurity/Biodiversity (Biosecurity Act). These all underpin environmental reporting and environmental policy making but are wider than the scope of s35(2) RMA.
93	Monitoring	L/A17, LR21	Another example of the current regional cooperative approach to environmental monitoring can be seen in the coordination role of the Special Interest Groups (SIGs) reporting to the Resource Managers Group. The activities of the Land Monitoring forum are a particularly good example where agreed monitoring guidelines have been developed and are published on the Ministry for Environment website. This facilitates national reporting while providing the data to do so. Other SIGs actively involved are the Surface Water Integrated Management group working with MfE on the NEMar project and has developed a number of protocols for dependable monitoring. The Local Area Environmental Monitoring Group whom are actively developing a National Environmental Monitoring and Qualifications system in collaboration with MfE, NIWA and other major monitoring stakeholders. Also Terrestrial and Freshwater Biodiversity Information System (TFBIS)
107	Monitoring	LT10	Have the following concerns with RMA amendment: (1) not clear how PCE will get information on land and biodiversity from TAs; (2) need NPS on indigenous biodiversity finalised so obligations don't conflict (3) biodiversity protection under s6(c) of RMA uses a variety of regulatory and non-regulatory methods (4) stock takes of biodiversity will vary from nil to comprehensive for different TAs (5) does not take into account effectiveness of city and district plans to provide sustainable urban form
235	Monitoring	A38	FOA seeks that the proposed reform ensures that the Regions capture sector specific data of utility for central government reporting , including MAF's Montreal Process reporting for temperate forests, which combines plantation forests and the national indigenous forest estate as managed by DOC.
237	Monitoring	A38	FOA believes that one area that requires careful thought (Q14) will be the way in which the relationship between the PCE's office and the Ministry for the Environment and other Government Departments (e.g. LINZ Geospatial office) is managed. By their very nature, monitoring strategies will tend to be quite long term and once key parameters established, change difficult to introduce without adverse impact on some datasets. Conversely, new technologies are constantly evolving and FOA urges that a very long term view be taken to establishing the best possible technological advantage now to future proof the monitoring framework. This implies considerable planning and liaison between the involved parties and possible upfront costs to complete partially established data sets that can benefit wider NZ on many issues beyond the SOE reporting objective. Some examples of sensing technologies such as LIDAR would be examples of this.
240	Monitoring	R39	Paper emphasises consistency in statistics when might be more appropriate to emphasise "relevance" of environmental statistics. Provides several examples.
242	Monitoring	A40	Existing monitoring programmes by local authorities should be re-configured, where necessary, to contribute to a consistent and comprehensive national dataset upon which credible national state of the environment reports can be based.
248	Monitoring	CG41	Any state of the environment reporting will need to be linked to actions/pathways necessary to address problems and should be clearly reflected in any proposed RMA amendment.
259	Monitoring	O44	Wish to ensure proposed monitoring legislation will result in the following outcomes "Greater environmental reporting efficiencies and avoidance of duplication in monitoring and reporting. "Information compiled by Watercare can be better utilised as part of the national reporting. "Information compiled can be used to provide baseline information
266	Monitoring	O45	should also amend s35(2) and s36 of RMA because s36 relates to funding arrangements
275	Monitoring	O46	With the reporting and allied functions being performed by the Government Statistician rather than the Ministry for the Environment it is possible existing powers of the Government Statistician may be sufficient, or at most his Act may require modest amendment and no Regulations. A key issue is the level at which monitoring is performed. For some the entire region or a regional or unitary council may be appropriate. For others that may be far too large, whilst those at mesh block level may in many instances be far too small. A key question is who's policy is the information gathered intended to inform? Central government, regional council, local council, local community, neighbourhood, applicants compiling data for infrastructure projects such as irrigation schemes and roading projects. It is not clear in the discussion paper which entity(ies) would be responsible for monitoring the ocean and where the boundaries might be. This includes not just the water composing the oceans, the forms of life in it and the air above it, but also the seabed and what lies under it. Also as noted earlier, it may be appropriate for some data to be collected from entities, such as businesses and not restricted solely to data collected directly by
280	Monitoring	R47	Currently little information collected to understand trends in coasts and ocean states
281	Monitoring	R47	Document does not recognise role environmental scientists play in designing robust and efficient and consistent monitoring and reporting systems
282	Monitoring	R47	Monitoring and modelling are different sides of same coin and both are needed in environmental management. Can help reduce number of monitoring sites needed and identify appropriate locations for sites
291	Monitoring	LR48	Need to make use of existing monitoring and data as much as possible
307	Monitoring	A55	Suggest using an ecosystem services framework because this would link environmental, economic, social and cultural values with functioning of ecosystems to allow for management of ecosystems within their natural limits
312	Monitoring	LR58	Resource parameters measured should not exceed minimal relevant set at each location
313	Monitoring	LR58	Monitoring locations must remain risk and management based
314	Monitoring	LR58	Methods for 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
318	Monitoring	A59	The issue of most significance to the Society is the way in which SOE reporting is linked to actions undertaken by regional councils and unitary authorities. There needs to be clearly identified pathways taken to address problems and these should be implemented within the RMA legislation.
319	Monitoring	O60	a number of monitoring roles require different info e.g. SOE reporting, environmental policy making, effectiveness and efficiency plans and policy statements, consent conditions compliance
354	Monitoring	R67	NZ understands other OECD countries have national indicators that are not 'all encompassing' and therefore recognise regional variability
367	Monitoring	R68	The proposed RMA amendments would be a positive step towards achieving more integrated and coordinated environmental monitoring to support national (actually multi-scale) SOE reporting. However, the current proposal suffers from a number of problems including: much env monitoring done by councils would need to occur on private land; emphasis appears to be on regional council and TAs, should also be included
378	Monitoring	O70	Concerned about what will happen to existing monitoring results and that changes in monitoring strategies/methodologies may postpone action for environmental concerns that have already been identified given lack of continuity of data
386	Monitoring	LU71	Local authorities must respond to needs of, and be accountable to their rate payers
387	Monitoring	LU71	there is a risk national monitoring required by regulation may take priority over regional monitoring
388	Monitoring	LU71	local authorities are custodians of some of longest and most powerful environmental datasets in country. Enforcing change may compromise these datasets when they need to be preserved
398	Monitoring	N72	We agree with the intent but believe Statistics New Zealand is the expert in regard to developing datasets and suggest that their role is clarified in the amendment and where possible that Statistics New Zealand is included in the decision-making process. Developing datasets requires a very robust conceptual framework and we believe Statistics New Zealand has the necessary expertise and can call on the expertise of international affiliates to design the very best monitoring system.
401	Monitoring	LU74	Recognise this is probably the most cost-effective option, but oppose it until a proper cost benefit analysis is completed and info provided on how costs would be offset

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Issue number	sub-theme	submitter number and sector code	Comments
3	Costs and Monitoring	O2	I would expect a large budget would be needed even if other agencies were largely responsible for collecting the raw data. Such a cost might be less for an organisation used to processing environmental data, e.g. a CRI, but the loss would be the lack of perceived freedom and loss of objectivity.
70	Costs and Additional Info	LR15	cost of regulating consistency of monitoring across all agencies that contribute stats, including local authorities, central govt, CRI and universities; estimated costs of national monitoring network and implementation plan including ongoing operation costs and how to share these equitably, comparison with other OECD country costs for national SOE monitoring and reporting including how these are funded, which frameworks are used and why
103	Costs and Additional Info	L/A17	Yes, the value of SOE monitoring (\$) and the cost of development and implementation.
69	Costs and High level cost	LR15	no quantification of regional specific impacts (costs). Perhaps consider cost-effectiveness analysis of contingent valuation
87	Costs and High level cost	LT16, A36, R68, LU74, O76	There is a value to NZ of being able to validate the NZ Brand (NZ pure, NZ Inc) position in the global marketplace e.g. it has been estimated that \$184bn of ecosystem services is provided from NZ's marine resources..
102	Costs and High level cost	L/A17	There is a value to New Zealand of being able to validate the New Zealand pure, and NZ Inc position in the global marketplace
119	Costs and High level cost	LR21, R26	currently NZ does not have capability to provide international customers assurances that production of NZ goods are not causing environmental problems
129	Costs and High level cost	LR21, LU22	not possible to estimate high level costs until purpose of data collection and analysis is confirmed and stock take of existing activities is made
183	Costs and High level cost	A29	Costs to local authorities have not been determined and require a detailed scoping study. There are assumed reductions in cost at central government level for collection and compiling of data, and these will be most readily realised by strengthening existing systems under MfE. The benefits listed are, in general, reasonable however the cost of duplication by requiring PCE to conduct a role already largely performed by MfE is not reasonable. Standardised methodology for monitoring and reporting at a local and regional level, is required under all options being considered.
163	Costs and High level cost	R26	(1) Additional one off costs will be incurred to develop the national monitoring indicator set and framework through an NES for Environmental Monitoring. This will be required to detail monitoring requirements. (2) Resourcing levels to meet reporting requirements by the PCE's office will need to be considered. (3) Regular Monitoring costs for the national network of sample sites will be a significant cost and depending on how monitoring is undertaken e.g through local government teams or by a national team may need additional resourcing. (4) Ideally data would be held in a national data facility but could use existing agencies' databases - whether this was based on existing databases and facilities or a national environmental data base would have varied cost implications.
220	Costs and High level cost	LR35	The discussion document does not identify the value to New Zealand of independent and regular national state of the environment monitoring (i.e. is it for national branding purposes or to comply with OECD requirements etc.)
238	Costs and High level cost	A38	FOA also notes that added benefits should be accounted for in terms of the economic leverage obtained by establishing nationally significant datasets and implementing new technologies for deriving them (e.g. LIDAR). Implementation of such free access national datasets will often have significant wider economic value to NZ and the opportunity to establish them as part of a comprehensive review on NZ's national land-based data needs should not be overlooked.
276	Costs and High level cost	O46	The key benefit(s) of improved environmental reporting is NOT referred to in the discussion document and this seems quite odd. The key purpose of improved national environmental reporting is to improve the development of policy for Central Government and government actions. At a second tier it would also better inform policy development by regional and local authorities. Thirdly, but not last, it could inform business of business opportunities and of matters for them to take into account in their capital and operational decision-making. It would seem if silo thinking is eliminated, then the possibility of duplicated data collection and disparate data requirements would not be an issue. In which case cost should decrease rather than increase in that regard. The discussion document seems to infer there are 'left and right hands' which are not connected.
277	Costs and High level cost	O46	Consideration should be given to the data to potentially being used as part of the information used in for full cost accounting projects e.g. effects of the issuance of consents for open cast mining, hydro schemes, major roading projects and so on.
329	Costs and High level cost	N61	EDS considers that the main high level benefits have been accurately identified. In particular, EDS submits that the information should result in earlier detection of environmental problems and consequently better national environmental management decisions on the environment and the economy. The main cost associated with regular independent reports on the state of the environment in terms of the potential duplication of effort by separate agencies in aggregating environmental statistics and reporting on the state of the environment should not be overstated. It could be sufficiently addressed through co-ordination between agencies and it should be clear that the PCE is responsible for national environmental reporting.
330	Costs and High level cost	N61	An additional high level benefit of state of the environment reporting is that it enables policy makers and the public to assess whether measures implemented to address environmental problems have been effective and respond accordingly.
369	Costs and High level cost	R68	Regarding regular, independent reports, we perceive two additional high-level benefits: A) Monitoring at the national level is regularised and no longer subject to divisions of individual governments, ministers, or department executives. B) New Zealanders are confident and proud in knowing that they are conserving and managing the environment for the benefit of current and future generations. Regarding improving environmental statistics, we broadly agree that the high-level benefits outlined are possible given the proposed amendments but they carry the following two qualifications: A) The benefits only apply to data collected by local authorities, i.e. primarily regional councils. Data collected by other organisations will not necessarily benefit from these RMA amendments. However, the requirement for more coordinated monitoring by regional councils might spur broader coordination as a side benefit, as is currently the case. B) Improved coordination of biodiversity information across DOC and regional councils. Linking to the data online initiatives of the Department of Internal Affairs may provide a way to facilitate links across local government and for data sharing. B) The other benefits depend on what is monitored
164	Costs and Other	R26	Scion has experience in developing monitoring frameworks. Specifically designing sampling strategies and indicator systems. We could provide input to the level of resources required for the sorts of activities that would be needed to underpin an NES for environmental monitoring
194	Costs and Other	O32	WIC's main concern with the proposed monitoring is that it will potentially lead to duplication, over-monitoring and greatly increased costs; namely at the regional and local level. As was described in the discussion document, local authorities currently undertake their own monitoring in order to discharge their duties under the Resource Management Act (RMA). However, the introduction of national monitoring standards will not reduce these RMA duties. Instead, it will potentially simply lead to another layer of monitoring in addition to what is already being undertaken by local authorities. In effect, local authorities may not reduce or change the amount of local monitoring that is undertaken to meet their own requirements. This could see the amount of monitoring being undertaken increasing substantially, with the cost being passed on to land owners or resource users. The monitoring which is to be undertaken (at the national and sub-national levels) needs to be meaningful and useful
207	Costs and Other	A33	A benefit is that environmental reporting should also be scanning for emerging problems in the environment. A more co-ordinated approach will improve investment and innovation in developing new approaches for automated sample processing. Better coordination between agencies on reporting also improves the wider communication and can lead to improved management of what the data tells us. Data returned and analysed from a co-ordinated approach will support the environmental goals of the proposal, such as the development of new resources and uses derived from the marine environment. There are many advantages in developing open access data sharing and promoting the rescue and reuse of publicly generated or funded data: (see www.environment.govt.nz/conservation/health/monitoring.html)
28	Costs and benefits		Will PCE or another agency have the resource to ensure 5-yearly reporting is carried out in a timely and robust manner
72	Costs and benefits	LT16, L/A17, LU72, LR23, O75, LR28, A31, LR35, CG4, LR47, LR48, LR49, A55, O98, O60, A67, LU71, LU74	who will bear cost of collecting data for national environmental reporting? Central govt should pay, not rate payers. Central govt already pays for CRIs to collect data
88	Costs and benefits	LT16	The value of SOE monitoring (\$); the cost of development and implementation; and where the cost of implementation will fall.
111	Costs and benefits	N19	any costs incurred would be clearly offset and outweighed by tangible and intangible economical and environmental benefits of better environmental reporting.
155	Costs and benefits	R26	long term monitoring and reporting is expensive and will need to be adequately resourced with both people and budget
184	Costs and benefits	A29	Improved consistency of environmental statistics and reporting will enable better assessment of the issues, risks and priorities at a national scale. It will improve confidence that local issues are being addressed to a consistently high standard. Some local authorities and agencies may require additional resources. Consistent national scale reporting provides an opportunity for improved benchmarking against international trading partners and trade competitors.
197	Costs and benefits	A33	The "informal" analysis should be available for stakeholders to see. We suspect that "informal" is code for "back of the envelope". We find this sort of approach unacceptable given the software and methodologies available to formally assess such things.
226	Costs and benefits	A36	The benefits arising from the proposal for an Environmental Reporting Bill need to be re-worded (p. 27, Q.16), as the current wording is inconsistent with the objectives of the proposal itself. One of the two main benefits of regular independent state of the environment reports currently reads: "greater transparency around quantifying New Zealand's clean, green image". This statement may jeopardise the goals of the proposal, which rightly include "high quality environmental statistics" (p. 4). Such statistics describe objectively the New Zealand state of the environment, rather than describing a pre-conceived image. The wording (p. 27) should be changed to "greater transparency in quantifying New Zealand's state of the environment".

232	Costs and benefits	R37	The availability of high quality environmental monitoring information will have significant benefits including: *International environmental reporting will be easier, more editing and will make clear the state of the New Zealand environment to an international audience *High quality data at a national scale enabling the contrasting of environmental outcomes of management across jurisdictions of local government agencies *National environmental reporting will enable a consistent comparison of different policy approaches (e.g. voluntary v regulatory) *High level data that is comparative across space and time will enable more effective prioritisation of environmental management by identifying key issues *Accurate determination of impacts of environmental damage, and therefore more effective litigation against (particularly large scale) polluters.
234	Costs and benefits	A38	To the extent that costs may increase this has to be offset by the benefits that will accrue to the nation long term from better informed policy formulation, public process and land use. It is suggested that the current costs of suboptimal results are imposing significant costs and often, through lack of transparency, economic distortions that do not serve the nation's economic or environmental objectives well.
243	Costs and benefits	A40	The revised reporting regime should not impose additional cost on land users
244	Costs and benefits	A40	any additional cost must be shared equitably among beneficiaries, remembering that there is a large element of public good associated with SOE reporting.
250	Costs and benefits	O42	may affect our position as a nation in the international arena
261	Costs and benefits	O45	Expect benefits will mainly be at national level
286	Costs and benefits	R47	cost of science input to design and devise on consistent, robust and interoperable monitoring. Also co-benefits form using quality-controlled environmental data
287	Costs and benefits	R47	NIWA can provide info on costs and benefits of monitoring air and water (freshwater, coastal, estuarine and oceans, and water biodiversity)
297	Costs and benefits	LR49, LR23, LR21, LR58, LU74	More CBA work is needed before requirement for regional councils to do work is drafted and notified for submissions
320	Costs and benefits	O60	costs should be attributed to a wider constituency through a method such as a general or targeted tax or rate. Cost recovery model like this is used by ECAN
331	Costs and benefits	N61	EOS does not have any specific information to be included in the final cost-benefit analysis. It considers that the analysis should include ways in which the costs can be minimised and the benefits enhanced. For example, sharing information between agencies would reduce duplication, and selecting key indicators which indirectly measure other aspects would reduce the need to measure all of these aspects separately thereby reducing the cost of compliance.
335	Costs and benefits	A63	NZIF agrees that our high quality agricultural exports and lucrative tourist industry rely on environmental credentials and notes that the contribution made by these sectors in maintaining NZ's clean green image may be inversely proportional to the value they receive. NZIF agrees that our high quality agricultural exports and lucrative tourist industry rely on environmental credentials and notes that the contribution made by these sectors in maintaining NZ's clean green image may be inversely proportional to the value they receive.
338	Costs and benefits	A63	Regardless of which agency has responsibility for them, national systems must be adequately resourced and directly funded by government, with no opportunities for shortcuts and cost saving that will compromise the accuracy and authority of the final national report and which can particularly affect trends over time.
339	Costs and benefits	A63	National environmental reporting also needs to be justified and paid for explicitly and openly at the national level. It requires explicit cost / benefit justification for the expenditure that should be produced before that expenditure is incurred. Such justification needs to specify clearly the objectives of the national environmental report.
347	Costs and benefits	A63	If New Zealand's state of the environment reporting is currently considered inadequate, then it is unlikely that there will be cost reductions by making it better. Devolving costs to another entity (say from the Ministry for the Environment to local authorities) implies cost reductions to one entity (central government) and increased costs elsewhere (regional government).
348	Costs and benefits	A63	There is a possibility that data collected under a national system may assist or reduce the work load of Regional Councils and others. Coordination between the different environmental data collectors and users needs to be explored to avoid the possibility of paying twice for the collection of the same data.
349	Costs and benefits	A63	The cost of designing a national inventory or sampling system and actually collecting the data. The benefits that arise from purposes other than reporting that can arise from the provision of statistically sound national data.
350	Costs and benefits	LR64	monitoring can be significant cost for local govt. Any alternation to monitoring requirements will impact on local govt and their communities through long-term planning cycle. Increased monitoring cost likely to result in reduction in levels or numbers of services that local govt can carry out on behalf of its community. Therefore appropriate funding mechanisms and capacity building must be part of any changes
351	Costs and benefits	LR64	disestablished. Long-term monitoring adds to knowledge each year so changes to parameters results in a loss of cumulative knowledge/infr.
357	Costs and benefits	A67	An issue not covered by the discussion document is the considerable cost imposed upon those regional councils and local 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.
380	Costs and benefits	LU71	benefits of preferred option accrue at national level while costs accrue at regional level.

Issue number	sub-theme	submitter number and sector code	Comments
2	Other	O2	In relation to the Foreword, the second sentence underscores the dependence we currently have on 'high quality agricultural exports and our lucrative tourist industry...' Indeed, we must use these current advantages, and do that we need to attend to an efficient and effective means of monitoring our environment. However, I believe we should be using the current advantages and resource base of our farming and natural environments to provide 1) a means to reach for a future with a higher proportion of more per capita valuable exports (IP and/or smarter manufacturing rather than commodity goods), and 2) the cultural and natural setting where people are going to want to stay or to come to provide the brains, drive and dollars to develop these new, non-commodity or tourism based industries. Refer Paul Callaghan regarding weaning ourselves off these low productivity industries.
27	Other	A6	Water quality has declined because the RMA has allowed regional councils to control land use and discharge of contaminants
29	Other	A6	is a general view that point sources of water pollution have been cleaned up - this is not the case
31	Other	A7	The Forum contributes to the provision of recycling data in the following ways:- 1. Collates and Reports data on glass consumed and recycled in New Zealand. See Figure 1 below. 2. As part of its project management of the Love NZ public place recycling programme is required to collate data from councils and organisations which have installed Love NZ recycling facilities and report total amount of packaging recovered to the Ministry for the Environment on an annual basis
55	Other	I13	Raises a number of questions about the discussion document
71	Other	LT16, L/A17	It is inappropriate to imply criticism of local government for not collecting national data when this is not the job of local government
79	Other	LT16, L/A17, LR21, A38, LR48, R52, A55	How will data be stored and viewed? Principles of "open data" should be applied
89	Other	L/A17, LR48, I50	The common driver for councils – both regional and territorial – is section 35 – which requires monitoring of the efficiency and effectiveness of policies and plans developed under the RMA. In this context, we note that for almost two decades regional councils specifically have actively collaborated with MfE to develop and deliver national environmental indicators. It is important that the progress which has been achieved in specific areas is not lost and that any framework is designed to support this work.
91	Other	L/A17, LR21, R51	purpose of environmental reporting not clearly described. Needs to include "what is the situation" and "so what". What is meant by environmental reporting? Could produce a separate conclusions and recommendations section to address this difference. Also who is intended audience?
112	Other	O20	NZ Historic Places Trust collects data under Historic Places Act and provides guidance for monitoring historic heritage under RMA
132	Other	LR23	supports reform to deliver more independent and robust environmental reporting, but believes there are fundamental deficiencies in recommendations proposed, which clouded with failure to fully acknowledge scope and scale of issues, means there is little likelihood of this reform delivering better national SOE monitoring and reporting.
133	Other	LR23	Be clear the proposal refers to NATIONAL SOE reporting.
165	Other	R27, O45	no mention made of data storage requirements, for example consistency in data format to aid efficient storage and transfer between agencies
186	Other	A30, LR48	IPENZ thinks the scope of the state of the environment reporting will need defining and tightening. Under the Environment Act 1986 the "environment" is defined broadly and includes "a) ecosystems and their constituent parts including people and communities; and b) all natural and physical resources; and c) those physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes; and d) the social, economic, aesthetic, and cultural conditions which affect the matters stated in paragraphs (a) to (c) or which are affected by those matters". We believe tightening and defining "state of the environment reporting" will be needed to ensure the reporting has reasonable boundaries and does not become an overwhelming task. We consider state of the environment reporting should focus on the physical environment, which appears to be the proposal's intended focus given the contents of the discussion document.
195	Other	A33	This opportunity to develop meaningful reporting about the marine environment at a national scale will require rigorous time series of data that extend beyond the coast and the RMA's jurisdiction to be effective. We would like to see a whole systems approach to reporting on the full marine environment, with attention given to connectivity issues such as the downstream effects of land-based activities on marine habitats and species, and the broader context of climate change impacts on the ocean, including ocean acidification. Interpretation of highly variable coastal data will need to take place in the context of long-term trends in the oceanic domain beyond the Territorial Sea, to the EEZ and Continental Shelf waters.
199	Other	A33	We observe that biodiversity, the economic evaluation of biodiversity, biosecurity and ecosystem services and the review of environmental statistics by Stats NZ are missing from this discussion. This needs to be rectified.
205	Other	A33	Suggested amendments to table 3: * Include other agency functions and responsibilities to contribute to the reporting e.g. EPA, Mfish, DOC. * Add more detail so it is clear e.g. MfE will still carry out functions outlined in the current functions columns. * These functions are not identified or are some of these current functions now undertaken by EPA? * We need clarity of roles where there is uncertainty not just the lead agency.
208	Other	LR35	The Council already has multiple requests to access their data from a range of users including government and consultants. They are developing a web-based portal to proactively manage their data.
209	Other	LR35, A43, O45, LR48, LR64, LU71, LU74	discussion document is very high level and does not contain sufficient detail to enable submissions on the substantive content and implications of these. (including comments on costs and benefits). Details of many issues and challenges are not identified or addressed
221	Other	A36	There is a need to build from existing biodiversity monitoring systems, e.g. national wetland monitoring system; permanent forest and grassland plot monitoring systems; LENZ; and Department of Conservation, and Regional Council programmes currently being developed. Co-ordinated and standard methods need to be developed without losing the significant work that has already been achieved
224	Other	A36, R37, A59	Data needs to be publically available and communicated
230	Other	R37	monitoring and reporting needs to be audited or peer-reviewed
249	Other	O42	Our view is that it is vital New Zealand entities enhance the quality of reporting on environmental, social and economic well being, not only by Central and local government but also by other significant entities within New Zealand. We see this best occurring within a "integrated reporting" framework – a framework that takes into account both vertical and horizontal integration. Integrated reporting is a single document which provides a clear assessment of an entity's financial, social and environmental performance can offer experience with development of monitoring standards and what is likely to be included in this
260	Other	O44	Use of A36 or RMA to recover costs from consent holders for MfE monitoring.
262	Other	O45	Need to clarify purpose of SOE monitoring and reporting including if for national or regional purposes, and consider alternative funding sources to reduce cost to councils and consent holders
263	Other	O45	GNIS work with councils is recognised on page 9, but not NZ's National Water Quality Network which is also linked with councils
283	Other	R47	need to acknowledge settlement between local government and Crown and that integrity of the co-governance and co-management arrangements from the settlement are upheld and acknowledged as part of any new legislation that determines objectives for environmental wellbeing. We would include Waikato's successful participation and views being taken into account. Joint-management arrangements include monitoring and enforcement, including agreeing monitoring priorities and methods
298	Other	I50	
301	Other	R51	Why is current voluntary approach of MfE working with councils to get data not working?
302	Other	R51	Ornithological Society has carried out long-term monitoring of bird populations (submission contains more details)
306	Other	A55	Our key messages are: 1) That environmental reporting in New Zealand should be improved; 2) That environmental reporting should have a clearly defined purpose and value proposition; 3) That stronger links between environmental reporting and environmental policy are necessary; and 4) That the development of environmental policies should be an adaptive process and that the Ministry for the Environment should consider the use of an ecosystem services framework to co-ordinate this work
332	Other	A62	reporting should be independent of government AND sectoral influence. It also shouldn't become a vehicle for environmental advocacy
333	Other	A63	PCE more in line with advocacy. This sense of true independence is absent from the assessment provided in the discussion document (pages 17 – 18) of different offices / agencies which could be assigned responsibility for preparing the report. The discussion document favours the Office of the Parliamentary Commissioner for the Environment (PCE) for the role, apparently on the basis that she is independent of the government. However the statutory role of the PCE is an explicitly pro-environment one. The PCE herself, in her 2011 annual report, recalls that the term "watchdog" was used to describe her office when the role was initially created in the Environment Act 1986.
337	Other	A63	National environmental reporting must be able to assess and report on both the good and the bad in our environment, without fear or favour, and to be able to detail issues and action that might be needed for improvement, if the intent of not just reporting the state of the environment but also of improving environmental management is to be achieved
353	Other	A67	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. I link to comment 1.136 on regional variation 2271
376	Other	O70	High quality and accessible environmental data will be important in further defining the cause and effect relationship between SOE and human health. Can assist in evaluating effectiveness of current and future interventions
379	Other	O70	Suggest legislation mandates overall reporting framework, the domains, organisation responsible for report production. Is not role of legislation to specify details of environmental variable monitoring such as sample sites and sampling methodology. Could use existing guideline documents to provide these details.
382	Other	LU71	Legislation alone will not necessarily deliver an improvement in quality and consistency of environmental data for national reporting.
383	Other	LU71	Investment is required to develop robust protocols, indicators and monitoring networks
385	Other	LU71	document present an unbalanced argument, stressing problems associated with MfE being reliant on data from other agencies whilst not recognising benefits of this arrangement. MfE has access to huge amount of information at very little cost
385	Other	LU71	Document ignores responsibility of MfE to develop and monitor appropriate national environmental indicators. Instead local govt is charged with failing to meet govt's information needs
391	Other	N72	That the boundaries the report is aiming to report upon are represented more accurately in its title. A more appropriate title could be "The State of New Zealand's Natural Capital" or "The State of New Zealand's Resources".

397	Other	N72	<p>Lastly, there are a number of outstanding issues we believe should be determined before the Bill passes into law. These include: 1. The purpose of the report (including clarification of boundary issues). 2. Who will receive the report (e.g. will it be tabled in the House of Representatives?). 3. The frequency of reports. 4. Who will use the report? 5. What information will users of the report need? 6. How best should this information be presented and in what delivery format? 7. How the report might be used by decision-makers. 8. How the report might be assessed now and in the future. 9. Who will review and comment on the report? 10. How the report works with other reports to inform the public and ensure better decisions are made. 11. How it relates to other reports such as Statistics New Zealand's Measuring New Zealand's Progress Using a Sustainable Development Approach: 2008 (particularly the indicators identified in this report) and other Sustainable Development Reports. 12. The nature and type of information that must be reported (so that boundary issues are resolved). 13. Who will collect the data? 14. Who will police the data (including defining penalties for</p>
402	Other	G75	<p>NZ has unique role in international circles with regards to atmospheric and oceanic monitoring and this warrants quite expensive outlay associated with regular studies if we are to stand tall in environmental stewardship</p>

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Submitter no.	sector P, L, LR, LT, LU, R, N, G, O	region	direction of (general proposal)	1a	1b	2	3a	3b	4	5	6	7	8	9	10	11	12a	12b	13a	13b	14	15	16	17	18
Overall View	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Questions	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Problem, Objectives, criteria	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Options	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Reporting	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Monitoring	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Costs and benefits	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
S, D, U	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Other comments	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
1	I	Wellington	S																						
2	O	Canterbury	S	Y	Y	N	B																		
3	LT	West Coast	S																						
4	R	Auckland	S																						
5	P	National	S																						
6	A	National	S	Y	Y	Y	B	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
7	A	National	S	Y	Y	Y	R	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
8	R	Bay of Plenty	S	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
9	N	Southland	S																						
10	LT	Canterbury	S																						
11	LT	Northland	S																						
12	PF	National	S																						
13	I	Waikato	S																						
14	LR	Southland	S																						
15	LR	Canterbury	S	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
16	LT	Northland	S	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y

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Supports LGNZ submission

Submission still to be approved by Council and could change

Other comments

suggests Maori components be included in the summary of submissions and Bill

17	L/A	National	S	Y	N see 61 issue 181	Y	B	182	183	N see 183	Y	194	N see 195, 96 197	Y	198	see 199	100	see 185	built, social or cultural components; can't prioritise but NZ to (\$) value is that can't suggest mont or the adding twi 90, relationships 92, that may exist across domains; 101 monitoring nmetn	see 1102	Y see 103		
18	R	Canterbury	U		see 104, 105		B	105	105	N see 105											see 1111		
19	N	National	S				B				Y	Y	Y	Y		see 108	see 109			Geothermal, estuarine, freshwater, biodiversity, land, include to marine to territorial sea and EEZwi and cultural monitoring see 114	see 1110	Focus is on their role collecting data under Historic Places Act - see 112	
20	O	National	S																	Geothermal, estuarine, freshwater, biodiversity, land, include to marine to territorial sea and EEZwi and cultural monitoring see 114	see 1110	Focus is on their role collecting data under Historic Places Act - see 112	
21	LR	Waikato	S	Y	Y see 118	Y	B	119, 120	Y	Y see 119, 120	Y	Y	Y	Y	Y	Y see 121, 125	Y see 126	Y see 127, 128	Y see 127, 128	Y see 127, 128	Y see 127, 128	Y see 127, 128	Y see 127, 128
22	LU	Gisborne	S																		see 1129		
23	LR	Taranaki	LR		S see 132 (support idea for reform, but not proposed approach)	N see 137		Y see 139	Y see 140	N see 134	N see 141	N see 144	N see 145, 146							Y see 143	see 142 and 143		
24	O	Otago and Southland	S	Y			R	Y see 149	Y	Y	Y	Y	Y see 147, 148	N						Y see 147, 148	Y see 147, 148		
25	LU	Nelson	S																		see 1155		
26	R	Bay of Plenty	S	Y	issues are more detailed than set out in discussion Y - doc cost huge M	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y see 157	Y see 158	Y see 159	Y see 160	Y see 161	Y see 162	Y see 163	see 164
27	R	Northland	S	Y	issues are more detailed than set out in discussion Y - doc cost huge M	Y		Y	Y	Y	Y	Y	Y	Y	Y	Y see 167	Y see 168	Y see 169	Y see 170	Y see 171	Y see 172	Y see 173	see 174
28	LR	Bay of Plenty	S																		see 172		
29	A	National	S	Y				Y see 175	Y see 176, 177 a)	N see 179	Y see 179	Y see 180	Y see 181	Y see 182	Y see 183	Y see 184	Y see 185	Y see 186	Y see 187	Y see 188	Y see 189	Y see 190	Y see 191

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Issue number	Issue	Sub-theme	Submitter number and sector code	Comments	MfE response
1	Reporting	Maori	I1	I wish to recommend Maori components to be incorporated into the summary of submissions and the proposed environmental reporting bill draft to be presented to the minister. Recommended components to be: Maori environmental monitoring is a necessary activity to be linked to the environmental reporting bill; Maori environmental monitoring is a prerequisite for sustainability of Taonga. (Biological resources). Key recommendations within the Wai 262 Report 2011 specific to Maori, and sustainability of taonga should be included in the summary and proposed bill draft.	
2	Other		O2	In relation to the Foreword, the second sentence underscores the dependence we currently have on 'high quality agricultural exports and our lucrative tourist industry...'. Indeed, we must use these current advantages, and to do that we need to attend to an efficient and effective means of monitoring our environment. However, I believe we should be using the current advantages and resource base of our farming and natural environments to provide 1) a means to reach for a future with a higher proportion of more per capita valuable exports (IP and/or smarter manufacturing rather than commodity goods), and 2) the cultural and natural setting where people are going to want to stay or to come to provide the brains, drive and dollars to develop these new, non-commodity or tourism based industries. Refer Paul Callaghan regarding weaning ourselves off these low productivity industries.	
3	Costs and	Monitoring	O2	I would expect a large budget would be needed even if other agencies were largely responsible for collecting the raw data. Such a cost might be less for an organisation used to processing environmental data, e.g. a CRI, but the loss would be the lack of perceived (or actual) freedom and loss of objectivity.	
4	Reporting	Other	O2, LR49	in relation to consistency, while there might need to be a set of factors and associated means of studying them (how, when, by whom etc.) applied across the country, unique regional factors, or factors that apply in some and not other regions might also be needed. For instance, on the east of the country (drier, sunnier etc.) there might be great need to study some things that are not relevant in the west. Or maybe this is a difference in intensity of monitoring rather than missing plots in some regions. Phosphorus and nitrogen levels in water important in some areas, but not in others	
5	Reporting	Domains	O2	Assuming this is native biodiversity, perhaps we also have a responsibility to monitor exotic biodiversity that might be covered by IUCN concerns, or covered by Convention on Biological Diversity because threatened in the wild in home country.	
6	Monitoring		LT3, LT16, LT11	Lack of clarity about impact of the initiative on Territorial Authorities. Some TA's also collect data eg waste, biodiversity.	
7	Monitoring and reporting		LT3	appears to be a gap in the document about how this collection of local information will transfer to a National State of the Environment Programme...	
8	Monitoring and reporting		LT3	data is collected to inform local or regional level, not national	
9	Monitoring and reporting		LT3	cost of obtaining any new national information needs to be considered in context of cost and usefulness of the information	
10	Monitoring and reporting		LT3	Inappropriate to merely transfer duties and costs of national reporting to local government	
11	Criteria		R/G4	assessment criteria - methods should be cost efficient including methods for assessing invertebrate biodiversity	
12	Reporting	Domains	R/G4	Biodiversity very important, as are other 4 proposed domains	
13	Monitoring	Domains	R/G4	Provides huge amount of information on monitoring biodiversity - suggest using Plant-SyNZ system	
14			P5	Three recommendations were made in PCE report "How clean is NZ? Measuring and reporting on the health of our environment" on "improving environmental data and the system for environmental reporting. These were that reporting should be done on a regular basis, that environmental indicators should be regularly reviewed, and that there is a need for independence in who does the reporting - proposal is a significant development towards progressing these recommendations	
15	Monitoring	data collection	P5	A state of the environment report is one use of environmental data and must be distinguished from collection of data for other purposes eg environmental policy	
16	Monitoring	Domains	P5	In order to report independently, the Commissioner must not only be free to choose the data sets to use, but also be free to choose which indicators are best for diagnosing the state of different domains of the environment. Specifying domains is not consistent with the Environment Act	
17	Monitoring	data collection	P5	The Ministry currently has a substantial project on its work programme relating to the monitoring and reporting of freshwater, with implementation of changes potentially from July 2012. There is a question as to how fast this should be progressed when the function of who is to undertake State of the Environment reporting is under active discussion. PCE may wish to provide advice on her preferences for standardized freshwater data.	
18	Options	Reporting	P5	The function of environment reporting is consistent with the Commissioner's role as an environmental overseer and auditor. While the word 'auditor' does not specifically appear in the Environment Act, this was clearly Parliament's intent when legislation establishing the role was passed in 1986. The auditing role is currently reflected in the Commissioner's functions of reviewing the environmental "system of agencies and processes", investigating "the effectiveness of environmental planning and management", and investigating any matter where "the environment may be or has been adversely affected". A new function of reporting on the State of the Environment reporting would strengthen this auditing role. Reporting on the State of the Environment would also be consistent with the Commissioner's function of undertaking and encouraging "the collection and dissemination of information relating to the environment"...	
19	Options	Reporting	P5	Talks about effects on the Commissioner's work if she takes on reporting obligation - would not undermine her existing functions and powers. Issues raised include appropriation, environmental domains, timeliness	
20	Options	Reporting	P5	This is a credible timeframe, although it will require empowering legislation to proceed promptly to allow sufficient time to prepare the first report in 2013.	
21			A6	We have noted previously, as have others, that in reference to water issues the highly devolved and fragmented delivery system is resulting in a growing level of unintended consequences, not least in developing a nationally consistent and comprehensive set of indicators in reference to water quality	
22	Issues		A6	performance of both the regulator and service provider is an issue that has not been considered	
23	options		A6	Q 9: We note the comments on page 5 of the discussion document and agree a „one agency“ approach is likely to bring positive national benefits, albeit with some uncertainty on regional/local cost impacts at this stage.	
24	Options	highest net benefit	A6	Q 10: Notwithstanding the uncertainty noted above, it is likely the independent PCE option would deliver the highest level of net benefit.	
25	Reporting	pros and cons	A6	Q 11: With the additions we propose in Q 13, we see only pros in amendment of the Environment Act.	
26	Reporting	Domains	A6	Q 13: Within the water and ocean domains we suggest compliance with consented point source discharge conditions be included in the legislative requirements. We discuss this further below.	
27	Other		A6	Water quality has declined because the RMA has allowed regional councils to control land use and discharge of contaminants	
28	Costs and benefits		A6	will PCE or another agency have the resource to ensure 5-yearly reporting is carried out in a timely and robust manner	
29	Other		A6	Is a general view that point sources of water pollution have been cleaned up - this is not the case	
30	Reporting	other	A6	Aggregation and publication of data on compliance with consent conditions for water discharges would be a valuable addition to New Zealand's reporting regime. It would assist in managing perceptions of political interference in environmental reporting at a regional level, as is occurring at present with decisions on prosecutions for breaches of consent conditions	

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31	Other	Data source - glass	A7	The Forum contributes to the provision of recycling data in the following ways:- 1. Collates and Reports data on glass consumed and recycled in New Zealand. See Figure 1 below. 2. As part of its project management of the Love NZ public place recycling programme is required to collate data from councils and organisations which have installed Love NZ recycling facilities and report total amount of packaging recovered to the Ministry for the Environment on an annual basis
32	Problem, e	Council responsibility	A7	Whilst responsibility for reporting under the RMA rests with regional councils, in practice territorial authorities that put in place waste management services are those that should provide the data on collection tonnages
33	Problem, e	Issues not considered	A7	The most recent data relating to waste to landfill available from the Ministry for the Environment is 2007-2008 with a snapshot update in 2010. However using the solid waste audit data to identify particular problem areas specifically with regard to glass being placed in landfill is difficult if not impossible because each waste report is based on different criteria.
34	Problem, e	Issues not considered	A7	From industry's perspective, the Forum relies on its own data collection process to identify the glass mass balance data in New Zealand.
35	Problem, e	Issues not considered	A7	Legislation requiring territorial authorities to produce consistent data will allow industry (and Government) to recognise particular problem areas. The discussion document does not identify the benefits to industry which would result from this proposed legislation
36	Problem, e	Consistent monitoring	A7	The Forum's experience with collating data on waste diverted from landfill shows that local authorities report data in different ways by volume or by weight; through one off waste audits or do not collate data at all. Some local authorities such as New Plymouth have excellent reporting systems. It is our experience through the management of the Love NZ programme that council staff are looking for leadership on how best to report data.
37	Options	reporting frequency	A7	Forum suggests a three yearly review timed to review the government of the day's performance in a three year election cycle would best hold the Government to account.
38	Options	costs and benefits	A7	The discussion document does not identify the benefits to industry which would result from this proposed legislation.
39	Reporting	domains	A7	There is no specific mention of waste and this needs to be clearly specified. Without understanding the total amount of waste by product type currently being processed, reduction targets cannot be set. It would also be beneficial if territorial authorities report on the cost of landfill in their region which will enable a cost benefit analysis to be done of the benefit of diverting waste from landfill.
40	Monitoring	funding for data collection	A7	Agree that data is required to put a monetary value on New Zealand's clean green image. Local authorities are allocated funds from the Waste Minimisation Fund to manage waste minimisation and will therefore have funding available to collate this data
41	Problem, e	Issues not considered	R	as a former employee of a Regional Council, I regularly witnessed these problems between council's, and between reporting periods within the one council. There exists too much scope for "interference" from local body politicians, and so there is currently considerable inconsistency in the data and methods used in collection
42	Problem, e	Issues not considered	R	Additionally, other important issues have not been included, which reveals a demonstrable lack of useful real-life data relating to some important environments, e.g. the coastal environment
43	Problem, e	scale of problem	R	There is a lack of audit control over reporting, and currently a lack of scrutiny of sampling site consistency, and a lack of control over timing of sampling (e.g. sampling is being demanded during periods of fine weather rather than during or post-storm, to avoid 'embarrassing' sediment or effluent [i.e. real] discharges; and actual state of contamination by nitrates of ground water in Canterbury)
44	Problem, e	alternative to PCE	R8	The three 'objectives' as stated are essential in the quest for true SoE reports. While it is clear to many people that the PCE is independent of Government, inclusion of truly or universally and obviously independent institutes like universities would assist with this worthy goal.
45	Options	address problem	R8	the problems with each option appear to be well identified.
46	Options	costs and benefits	R8	it is plain that the cost of misreporting (either through malicious or accidental means) will cost the nation more in the long term, as problems do compound to become insurmountable, if not dealt with early enough.
47	Reporting	Domains	R8	Provides huge amount of information on why coastal environments should be included and what should be measured
48	Monitoring	Obtaining data	PF12	Monitoring data is the difficult area. Monitoring gathered on a national basis can tell the world about the degradation, pollution or clean and green state of our air, land and water. It checks on compliance. Monitoring ought to also be able to constitute an early warning system so we identify unfavourable ecosystem change BEFORE it becomes a problem. This will depend on identifying key indicators. During my term of Office there were scientists who could tell us the first species that recolonised a recovering ecosystem but they could NOT tell us what were the first species to disappear.
49	Monitoring	Obtaining data	PF12	Landcare, coastcare and water care groups with the help of scientists and Local Government identified key indicator species for early warning signs of unacceptable change and some of these are used by Local Government today. However what is appropriate for one region is not for another area. Seeking to standardize indicator species nationwide is NOT a good idea.
50	Reporting	Domains	PF12	A recent workshop organized by the Royal Society of New Zealand on August 9,2011 identified that an Ecosystem Service approach helps to identify and quantify the ecological and socio-economic trade-offs and synergies on which decision-making should be based. (Costanza, R et al. "The value of the world's ecosystem services and natural capital" Nature 1997 v.387 p.253-260.) The focus for environmental reporting should be our ecosystems.
51	Reporting	Domains	PF12	Monitoring programs serve distinct purposes 1) a measure of degradation 2) compliance and 3) an early warning system. Data collected for only one purpose is unlikely to be the most suitable for a national data base. Complicating monitoring programs is the fact that our ecosystems are constantly changing and evolving without the help of humans. We are a young dynamic country and identifying the best indicators is a challenge. Each region has representative ecosystems and many have historical data. It is possible in many cases to report on the environmental health of a region and to identify trends. A variation index for representative ecosystems would enable a national picture of environmental change to be evaluated and reported
52	Reporting	reporting frequency	PF12	If Monitoring Programs are mandatory, there should be a requirement to report on trends over the past medium term. That should mean we avoid having the same environmental problems recurring at 10, 20 and 40 year intervals. We keep reinventing the wheel and its time this stopped and our environmental management prevents degradation of ecosystems and particularly requires degradation.
53	Monitoring	Obtaining data	I13	use NES instead of amending s360 of RMA?
54	Reporting	methods for analysis	I13	provide guidelines to PCE on data gathering methodologies and analysis which include matauranga Maori. Also PCE must have a strong Maori Unit to ensure matauranga Maori is incorporated
55	Other		I13	Raises a number of questions about the discussion document
56	Monitoring	data collection	I13	involved tangata whenua in development of environmental indicator and monitoring
57	Problem, e	Objectives	LR14	future framework and objectives are of concern. Further detail and consultation is required with Local Government prior to legislation being progressed, in particular (1) additional information on future reporting frameworks and indicators so implications for region can be considered; (2) ES has developed monitoring programme and there is concern this may no longer fit the national framework criteria; (3) concerns about how data collection will be funded
58	Options	Monitoring	LR14, LR15, LT1	Regional monitoring frameworks may not be suitable for national purposes. Additionally significant effort is put into establishing regional monitoring programmes and this monitoring might need to be changed to meet national reporting requirements. More detail is required on what is proposed, including how data collection will be funded. Regional monitoring is undertaken to meet regional needs
59	Reporting		LR15	recommends expediting the amendments to the Environment Act 1986 given the upcoming 2017 OECD environmental performance review of NZ so an independent SOE can be published prior
60	Monitoring		LR15, LR21, LR2	National state of environment reporting is not directed by RMA. Ecan supports national network of monitoring sites but submits regulations should not (1) impinge upon RMA s 35, 62 and 79 and monitoring directed by Local Govt Act, and should not shift local authority monitoring away from its intended purpose (2) impose unreasonable costs on rate payers without opportunity to consult them (3) require variables that are not driven by local authority functions and monitoring needs

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61	Monitoring	LR15, LT16, L/A17, LU22, LR23, LU25, A33, LR35, R37, CG41, O46, LR48, LU71, LU74	Need to regulate more than local authority monitoring if a satisfactory national picture is to be developed (i.e. data is also collected by others). i.e. take a whole of system approach
62	Problem, e issues	LR15	should be "national" state of the environment reporting
63	Problem, e issues	LR15	inconsistent regional monitoring programmes needs to be broadened to include all agencies that contribute environmental statistics
64	Problem, e issues	LR15	what SOE monitoring and reporting frameworks will be used and why? Monitoring can be for different purposes
65	Problem, e scale of problem	LR15	problem is lack of a "national" SOE monitoring network which all agencies can participate in
66	Problem, e Criteria	LR15	criteria seem more like principles. More detailed comments also provided
67	Reporting pros and cons	LR15	con might be capacity of PCE's office to undertake reporting function
68	Reporting Domains	LR15	more detail required to comment. How will they relate to other OECD member countries SOE programmes for Stats NZ work
69	Costs and high level costs	LR15	no quantification of regional specific impacts (costs). Perhaps consider cost-effectiveness analysis of contingent valuation
70	Costs and additional informati	LR15	cost of regulating consistency of monitoring across all agencies that contribute stats, including local authorities, central govt, CRI and universities; estimated costs of national monitoring network and implementation plan including ongoing operation costs and how to share these equitably, comparison with other OECD country costs for national SOE monitoring and reporting including how these are funded, which frameworks are used and why
71	Other	LT16, L/A17	It is inappropriate to imply criticism of local government for not collecting national data when this is not the job of local government
72	Costs and benefits	LT16, L/A17, LT11, LU22, LR23, LU25, LR28, A31, O32, LR35, CG41, A43, O45, R47, LR48, LR49, A55, LR58, O60, A67, LU71, LU74, LT77	who will bear cost of collecting data for national environmental reporting? Central govt should pay, not rate payers. Central govt already pays for CRIs to collect data
73	Monitoring	LT16, L/A17	As the provision of data for national reporting is a new responsibility and function for councils this needs to be addressed as the reporting framework is developed. Does the Act need to be amended (section 31 is relevant to FNDC) in addition to s360 – the regulation making power? If section 31 is not amended the regulation(s) to be developed may not be underpinned to the body of the Act. This very important area has not been addressed in the discussion document and without reasonable information about likely variables the full implications for this council are impossible to determine. We suggest that a benefit cost analysis would be a pre-requisite to developing any new legislation much less standardised reporting.
74	Reporting pros and cons	LT16, L/A17	The Parliamentary Commissioner for the Environment has no regulatory capacity to generate data. It is therefore assumed that it will be entirely dependant on MfE for this (or will proposed changes to the Environment Act cover this?). The Parliamentary Commissioner would have to request that a regulation is developed to require the collection of data and it is unclear what process will be required when changes are required to the specific variables. Will the regulation need to be amended?
75	Monitoring	LT16, L/A17, LR21, LR23, LU25, LR35, R37, LR48, R51, A55, LR64, LU74	National Environmental Standards require some level of consistency in measurement and data collection e.g. freshwater quality. There is also a level of collaboration and consistency in monitoring of biodiversity. Any future framework needs to capture work already underway and not undermine or duplicate it. In the past councils worked with MfE on the Environmental Performance Indicators Programme (1996 - 1998); and Environmental Information Sharing Protocols, including the development of national indicators and the implementation of the start of monitoring for national reporting purposes (2003). This work was abandoned by the Ministry.
76	Monitoring	LT16	is there any further intention to develop national indicators? Is there a role for culturally based environmental monitoring?
77	Reporting domains	LT16, L/A17, LT	Not enough information provided to comment e.g. what might fall under "Land"?
78	Reporting pros and cons	LT16, LR64	It is also likely the PCE will be subject to pressure to report on a range of matters from different sectors of the population. It is MfE which has control of the regulation making power (not PCE) and it is likely to be councils which will be responsible for collecting the data. There is no ability for the PCE to require MfE to do something so it is unclear how this will work in practice.
79	Other	LT16, L/A17, LR	How will data be stored and viewed? Principles of "open data" should be applied
80	Monitoring costs and benefits	LT16, L/A17	FNDC is opposed to the proposed Environmental Reporting Bill expanding the regulation making power under section 360 of the RMA until: (a) there has been a proper cost benefit analysis to determine the cost to local government to align or develop monitoring programmes to support national reporting requirements; and (b) there has been meaningful dialogue on how any new or additional costs should be offset.
81	Problem, e Issues not considere	LT16, L/A17	Quality Assurance, training and qualifications, and analytical capacity/capability
82	Problem, e Objectives	LT16, L/A17	The objectives need to refer to national state of the environment monitoring. The objectives also need to refer to indicator selection and funding
83	Problem, e Criteria	LT16, L/A17	The assessment criteria appear to be objectives not criteria. Criteria also need to include: capability of the organisations to undertake the respective roles and funding/cost.
84	options costs and benefits	LT16	value of SOE monitoring and reporting not clearly identified
85	Reporting timeframes	LT16, L/A17	Trends in environmental indicators can occur over longer timeframes, consideration should be given as to what indicators are useful at the 5 yearly intervals as opposed to a longer duration. For example reporting on vegetation state or land use change may not be adequately reflected in a time period such as five years. Clearly the frequency of reporting will be in part identified through the objectives that are identified
86	monitoring domains	LT16	Without a clear articulation of the objectives for each domain and identification of the variable/indicator to be measured we are not in a position to prioritise. There are also relationships between domains which may require multi-criteria prioritising i.e. it is not simply a case of prioritising a domain but rather inter and intra relationships need to be considered.
87	Costs and high level costs	LT16, A56, R68	There is a value to NZ of being able to validate the NZ Brand (NZ pure, NZ Inc) position in the global marketplace e.g. It has been estimated that \$184bn of ecosystem services is provided from NZ's marine resources.
88	Costs and benefits	LT16	The value of SOE monitoring (\$); the cost of development and implementation; and where the cost of implementation will fall.
89	Other	L/A17, LR48, ISC	The common driver for councils - both regional and territorial - is section 35 - which requires monitoring of the efficiency and effectiveness of policies and plans developed under the RMA. In this context we note that for almost two decades regional councils specifically have actively collaborated with MfE to develop and deliver national environmental indicators. It is important that the progress which has been achieved in specific areas is not lost and that any framework is designed to support this work.

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90	Monitoring		L/A17	Recognition is needed that councils already collect a significant amount of environmental data that can and has been utilised for national reporting purposes. There may be opportunities to build on existing programmes to better contribute to national reporting requirements but because national monitoring is not a function of local government a critical question is how will it be funded if there are requirements for data over and above existing programmes?
91	Other		L/A17, LR21, R5	purpose of environmental reporting not clearly described. Needs to include "what is the situation" and "so what". What is meant by environmental reporting? Could produce a separate conclusions and recommendations section to address this difference. Also who is intended audience?
92	Monitoring		L/A17, LR21	Central and local government have a number of other monitoring and reporting requirements including: consent and compliance, National Policy Statement and National Environmental Standards, community outcomes (Local Government Act), Transport (Land Transport Management Act) and Biosecurity/Biodiversity (Biosecurity Act). These all underpin environmental reporting and environmental policy making but are wider than the scope of s35(2) RMA.
93	Monitoring		L/A17, LR21	Another example of the current regional cooperative approach to environmental monitoring can be seen in the coordination role of the Special Interest Groups (SIGs) reporting to the Resource Managers Group. The activities of the Land Monitoring forum are a particularly good example where agreed monitoring guidelines have been developed and are published on the Ministry for Environment website. This facilitates national reporting while providing the data to do so. Other SIGs actively involved are the Surface Water Integrated Management group working with MfE on the NEMaR project and has developed a number of protocols for dependable monitoring. The Local Area Environmental Monitoring Group whom are actively developing a National Environmental Monitoring and Qualifications system in collaboration with MfE, NIWA and other major monitoring stakeholders. Also Terrestrial and Freshwater Biodiversity Information System (TFBIS)
94	Options	RMA	L/A17, R51	The preferred option identifies the need to improve consistency at the local level, and as identified earlier, local and regional programmes must deliver on local and regional needs. Compromising this for national level objectives is counter intuitive. Identification of the national level monitoring is first and foremost required, how this is developed to avoid duplication at the local and regional level is part of the national level collaboration
95	Options	alternative to PCE	L/A17	Another option not considered is legislation which enables regional government to deliver SOE reporting, audited by the PCE.
96	Options	alternative to RMA	L/A17	An alternative to the regulation developed under s 360 is a National Environmental Standard (NES). A regulation will need to be highly specific and, for example, will need to be site specific in relation to monitoring. An NES could be more descriptive and potentially more flexible by prescribing roles with the ability to make changes to variables or the locations monitored.
97	Options	address problem	L/A17	Insofar as a national level of reporting is required, the option of mandating the Parliamentary Commissioner for the Environment appears to address the reporting issue
98	Options	costs and benefits	L/A17	The value of SOE monitoring and reporting is not clearly identified and there is a lack of context to show the benefit of reporting at a national level. This is partly because the objective of the reporting has not been identified as discussed earlier. There will be costs associated with the preferred options: <ul style="list-style-type: none"> • how will councils be resourced to collect data to the standard and consistency prescribed at the number of sites prescribed? • if funding is not targeted then local and regional priorities are likely to trump national priorities. • if a change in methodology is prescribed then there will be an associated cost. This will need to be minimised. Care will also be needed to ensure that changes to methodology does not render obsolete original baseline data for a particular variable.
99	Options	highest net benefit	L/A17	The preferred option seems to align best with the existing duties of the Parliamentary Commissioner for the Environment. However, without being able to accurately determine the costs associated with the different options (because we do not know the variables within each domain) it is not possible to assess which option would deliver the highest level of net benefit..
100	Reporting	pros and cons	L/A17	While the role of PCE has the potential to bring independence to the process, the costs falling to the local government sector could be substantial if the councils are required to collect additional information and via different methodologies and additional sites..
101	Monitoring	Alternative to RMA	L/A17	Consideration is needed as to whether changes to s30 and s31 are required to accompany changes to s360. As discussed earlier – consideration should be given as to whether an NES is more appropriate for the actual standard. We accept that a s360 regulation is probably preferred regarding method and process.
102	Costs and benefits	high level costs	L/A17	There is a value to New Zealand of being able to validate the New Zealand pure, and NZ inc position in the global marketplace
103	Costs and benefits	additional information	L/A17	Yes, the value of SOE monitoring (\$) and the cost of development and implementation..
104	Problem, e Objectives		R18	the scope does not cover environmental data collected in other ways. I can see the sense in limiting the problem in this way however, there would be value in a long-term strategy that looks at all environmental quality data and integrates them into one free-access, user-friendly, web-enabled database..
105	Problem, e Objectives		R18	an objective of the policy is that "high quality environmental statistics are available to underpin state of the environment reporting and environmental policy-making." The issue where attention is needed is a broader one that data are not used to underpin good environmental decision-making. The limitations are institutional rather than technical, and Central Government has the potential to advance the ability of many organisations to make more and better use of data that have been expensively collected and inefficiently used.
106	Reporting	Domains	N9	Provides lots of info on why should monitor and report on wilding conifers
107	Monitoring		LT10	Have the following concerns with RMA amendment: (1) not clear how PCE will get information on land and biodiversity from TA's; (2) need NPS on indigenous biodiversity finalised so obligations don't conflict (3) biodiversity protection under s6(c) of RMA uses a variety of regulatory and non-regulatory methods (4) stock takes of biodiversity will vary from nil to comprehensive for different TA's (5) does not take into account effectiveness of city and district plans to provide sustainable urban form
108	Reporting	pros and cons	N19, R26, A31,	any risk of PCE not being properly funded or resourced will need to be addressed to ensure other crucial functions of PCE are not compromised
109	Reporting	timeframes	N19	could consider more frequent reporting sometime in the future (assuming it is cost effective)
110	Monitoring	Domains	N19	is just as important to get the right measures for each domain (e.g. what to measure within freshwater domain). Therefore need to further consult on measures
111	Costs and benefits		N19	any costs incurred would be clearly offset and outweighed by tangible and intangible economical and environmental benefits of better environmental reporting.
112	Other		O20	NZ Historic Places Trust collects data under Historic Places Act and provides guidance for monitoring historic heritage under RMA
113	Problem, e Objectives		LR21	does not clearly spell out purpose of environmental reporting
114	Reporting	Domains	LR21	contribution of iwi to resource management is increasing following Treaty settlements. Info collected and reported needs to provide a national picture that is also relevant to this unique dimension
115	Monitoring	Domains	LR21	Which monitoring framework will be used? Pressure-state-response? DPSIR? Driving-force-pressure-state-impact-response? Also lots of discussion on how should be monitored (e.g. forward looking)
116	Monitoring	Domains	LR21	central govt needs to take the lead (1) developing a consistent method of reporting this information that can be applied to whole country, (2) assisting less well-resourced regions to obtain info on water quality and ecology (3) assist all parties collecting data to make that data easily available and interoperable.
117	Monitoring	Domains	LR21	legislative amendments should require development of an agreed overarching framework that includes who will do what, how it will be collected and why and how it will be analysed, including reference to principles of open data and open and transparent government
118	Problem, e Objectives		LR21	scope and experimental design of environment reporting programme should be determined prior to developing RMA legislative amendments, including clearly defined objectives for monitoring
119	Costs and benefits	high level costs	LR21, R26	currently NZ does not have capability to provide international customers assurances that production of NZ goods are not causing environmental problems
120	Problem, e Objectives		LR21, LR35, A35	Make third objective "HIGH QUALITY" statistics (fit for purpose and meaningful)
121	options		LR21, LU25, A43	support establishment of Advisory Committee to support PCE in preparing report. Successfully used in Australia

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122	options	alternative	LR21, R26, A30,	NES would be an alternative option - could be more descriptive
123	options	address problem	LR21	critical to maximise usefulness of the information
124	options	costs and benefits	LR21	provides detailed list of possible costs and benefits including costs: resourcing and funding data collection, prioritising work, need for a separate targeted funding stream, cost to council to apply official statistics system principles and protocols; Benefits: councils may recover some costs via s36 RMA, greater opportunity for multiple use of stats for regional and national purposes, can include specifications in consent conditions to enable costs effective data gathering, helps ensure data collection skills are retained in councils
125	Reporting	pros and cons	LR21	Pros - brings independence; cons - unclear PCE has resources to do the job without undermining existing roles, PCE could be constrained to reporting on selected data that has been supplied, could be significant cost for local govt to collect data that is different to what already collect. PCE needs to be involved in design of monitoring programme
126	Reporting	timeframes	LR21	Hauraki Gulf SOE reporting should be synchronised with national reporting (currently 3 years)
127	Monitoring	problems	LR21	use of s360 RMA is appropriate, experimental design for collection and analysis of data to support SOE reporting should be clearly defined in s360 RMA, collection of data by other parties should be factored into RMA amendment, protocols for data management should be defined, MfE requires all data to be made openly available under "declaration on open and transparent government" and "NZ data and information management principles"
128	Monitoring	domains	LR21	PCE provided criteria for priority in 28 August 2008 report "SOE: prioritising environmental challenges - what matters most?" (cumulative, irreversibility, scale and extent, rate of increase, limits or tipping points
129	Costs and b	high level costs	LR21, LU22	not possible to estimate high level costs until purpose of data collection and analysis is confirmed and stock take of existing activities is made
130	Monitoring	pros and cons	LU22, LU25, O4	councils monitoring and reporting regime has been specifically designed to meet requirements of s35 of RMA - could create confusion if not amended
131	options		LR23	concerned with failure of discussion document to adopt a whole of system approach to deliver nationally robust environmental monitoring and reporting
132	Overall		LR23	supports reform to deliver more independent and robust environmental reporting, but believes there are fundamental deficiencies in recommendations proposed, which clouded with failure to fully acknowledge scope and scale of issues, means there is little likelihood of this govt reform delivering better national SOE monitoring and reporting.
133	Other	Blame	LR23	document reads as though govt is blaming councils for not collecting national data when it is not their job
134	Options	preferred options	LR23	Narrow focus on legislative options which by themselves, are unlikely to deliver the reform necessary
135	Options	preferred options	LR23	concerned the outcomes are pre-conceived. Need a whole system approach, not just part that related to PCE or local government
136	Problem, e	Issues	LR23, O32, LR4	in most cases regional variation in SOE monitoring programmes is entirely appropriate and should be recognised
137	Problem, e	Issues	LR23	seek amendment of issue 2 to address gathering high quality environmental statistics from all sources rather than just focusing on regional councils
138	Problem, e	Objectives	LR23, LR35, LR4	Confirm national focus in objectives
139	Problem, e	Objectives	LR23	discussion document fails to demonstrate appreciation of huge gulf between environmental statistics/data and environmental information (capability and capacity to process data with integrity and understanding to generate defensible information). Also fails to demonstrate appreciation of need to understand context. More data does not mean better information
140	Problem, e	Criteria	LR23	disagree with criteria E. Focus should be wider system and national environmental monitoring. Provide alternative wording
141	Options	PCE	LR23	Oppose PCE being given explicit role to scope and provide 5-yearly national SOE report. Is at odds with PCE current role. Councils questions if resourcing required for reporting is appreciated. PCE might cherry-pick what to report on
142	Reporting	Domains	LR23	Domains listed is very limited list. Implication is there must be two reports - one from PCE on domains listed and once from MfE or others on other things
143	Reporting	Domains	LR23	concerned at suggestion PCE would determine exact variables as shows lack of appreciation of what is required to deliver robust SOE report and monitoring
144	Options	RMA	LR23	Needs to be proper CBA to determine cost to councils to align or redesign regional monitoring programmes. If current regional monitoring is seriously inconsistent with national level monitoring will take serious additional resourcing to fix
145	Options	Alternative	LR23	would support 'whole of government' 'harvesting' of data/information from councils and other sources if data is then made openly available
146	Options	Alternative	LR23	MfE is best place to collate and report on national environmental information. PCE could have a role auditing how Ministry used the data.
147	Options	Alternative	O24	system similar to Stats NZ system of National Environmental Accounts would be appropriate
148	Options	Alternative	O24	a penalty regime may be needed for councils that fail to comply with reporting regulations (i.e. similar to late processing of consents)
149	Problem, e	Objectives	O24	would add objective around long-term data storage to minimise risk of data being lost due to restructuring and other political changes
150	options	Alternative	LU25	would support a whole of system approach
151	Problem, e	issues	LU25	issue is too narrowly focused on regional environmental monitoring. Inconsistencies in data collection, analysis and presentation methods are not confined to regional councils
152	O	Monitoring	R26	Has an environment monitoring programme focused on developing indicators for water, biodiversity and erosion of planted forests
153	options		R26	legislation will be required to achieve robust monitoring and reporting framework given current make up of national and local government agencies and inconsistencies in monitoring systems
154	Objectives		R26	environmental monitoring and reporting system is good for showing trends and is also a key component of policy development and analysis. Proposed bill focus more on reporting aspects and does not bring out wider forward looking benefits of such a system
155	Costs and benefits		R26	long term monitoring and reporting is expensive and will need to be adequately resourced with both people and budget
156	Problem, e	Criteria	R26	Could add criteria "fit with international monitoring standards" so system developed is internationally recognised and can contribute to global statistics
157	options	alternative	R26	could use a third party contractor like PWC or SGS Qualifor to compile the reports
158	options		R26	Giving the PCE the responsibility to regularly prepare a report meets the 'perceived independence test' as the PCE office would be compiling and analysing statistics from MfE and local Government sources. They would certainly be able to 'tell it like it is'. However a review of international state of the environment reporting shows that not all SoE reports are produced by independent third parties as proposed here, some are produced within Ministries. So it would be interesting to further explore whether perception is reality in terms of independence in NZ. If all that is being reported is 'state' i.e data and information without associated interpretation value judgments then reporting within a Ministry should be appropriate. If there is a layer of value judgments and interpretations drawn from the data then this is more appropriate for the PCE
159	options	costs and benefits	R26	Costs associated with the PCE's office with regards five yearly reporting would be additional to current costs and staff numbers and capabilities would need to be appropriate. This could lead to inefficiencies and added costs though maintaining staff numbers in 'off' years. Mechanisms such as staff secondments to the PCE's office over the reporting period from other agencies such as CRIs may be a potential option.
160	options	costs and benefits	R26	Costs associated with defining the national indicators and sampling framework would be a one off associated with developing an NES for environmental monitoring
161	Reporting	pros and cons	R26	Locating the reporting activity within the office of the PCE and the statistics gathering activities within MfE could lead to fragmentation of activity and a lowering of critical staffing levels within the Ministry which could have an adverse impact on its role under the Environment Act 'in formulating advice to the Government on environmental policies'

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162	Reporting timeframes	R26	However new technologies both for data monitoring with sensors and for analysis and representation of data mean that it is becoming increasingly feasible to do near real time reporting for some indicators and there are examples of such monitoring systems internationally. The Canadian Forest Service has been investigating ongoing reporting approaches with indicators reported separately on different timelines to give a more dynamic view of the environment. This approach also leads to a smoother workflow with less intense peaks. More work is recommended to evaluate reporting timelines
163	Costs and high level costs	R26	(1) Additional one off costs will be incurred to develop the national monitoring indicator set and framework through an NES for Environmental Monitoring. This will be required to detail monitoring requirements. (2) Resourcing levels to meet reporting requirements by the PCE's office will need to be considered. (3) Regular Monitoring costs for the national network of sample sites will be a significant cost and depending on how monitoring is undertaken e.g through local government teams or by a national team may need additional resourcing. (4) Ideally data would be held in a national data facility but could use existing agencies' databases – whether this was based on existing databases and facilities or a national environmental data base would have varied cost implications.
164	Costs and other	R26	Scion has experience in developing monitoring frameworks and specifically designing sampling strategies and indicator systems. We could provide input to the level of resources required for these sorts of activities that would be needed to underpin an NES for environmental monitoring
165	Other	R27, O45	Be clear the proposal refers to NATIONAL SOE reporting
166	Problem, e Objectives	R27	Doesn't see "independence" as a critical issue. - I agree with the first and third objectives but neither agree or disagree with the second objective. The second objective is the least important of the three objectives. I do not believe the independence of the reporting will have as greater effect on improving national environmental reporting as the other two objectives. If it is only "perceived" lack of independence then it is really important - can it be fixed by better transparency rather than shifting the reporting to an organisation independent of Government. Reporting should be done regularly, correctly and clearly with high quality data – if this is done with transparency (eg, underlying data available, clear methods etc) then who does the reporting does not matter
167	options alternative	R27, R69	Require a CRI or University to carry out the environmental reporting
168	options	R27	the options address the "identified" problems
169	options costs and benefits	R27	The preferred option 1 would have an increased cost associated it with as PCE are not currently staffed to carry out this role and if MfE were to continue collecting and analysing environmental information they would also need to retain staff to do this
170	Reporting pros and cons	R27, R52, A67, f	Cons – there would potentially be some duplication of work by PCE and MfE and there would need to be more staff overall working in this area
171	Monitoring problems	R27	The scale of the problem is huge (and should not be underestimated) and the impact of making this change will be huge (and this should not be underestimated either). It will take several years for councils to phase in changes ie, some have long term contracts with laboratories that will not be easily terminated
172	Monitoring problems	R27	All the areas highlighted as being specified under the reg are to do with monitoring but it is much more than this. For example, it is laboratory testing (right down to detection limits on tests), QA/QC of fieldwork (monitoring), lab testing and data entry, data storage.
173	options alternative	LR28	The Bay of Plenty Regional Council (Council) feels that the proposal only goes some way to ensure independent state of the environment reporting. The document argues that there is value in making state of the environment reporting independent. If this is so, why does it only propose to make the last link in the environmental data chain independent of ministerial influence? Council recommends that the proposal should consider options where data definition (and data analysis) is transferred to a standalone Crown Entity that could be relatively independent of political interests and have regulation-making powers (and analytical capability).
174	Problem, e issues	LR28	Council supports the matters raised in the discussion document (page 10) to reduce overall State of the Environment (SOE) reporting duplication and promote cost-efficiencies. Most regional councils produce, and make publicly available, regular information on the raw data collected for specific natural resource matters. This information is used to inform evidence based local decision-making. Council believes that typical audiences of regional SOE monitoring information want raw monitoring data. Council believes the general public would be better served by the national SOE report that enables regional comparability. Local responses to natural resource issues are identified and discussed with the community through the development of Council's policy frameworks and Long Term Plans. On the assumption that the Bill proceeds (as outlined in Chapter 5), Council recommends that the Ministry loosens its expectations on local authorities to produce separate SOE information for their respective area (goes onto provide specific recommendation with 3 bullet points)
175	Problem, e issues	A29	environmental reporting should permit valid international comparisons with trading partners and trade competitors
176	Problem, e Objectives	A29	Don't agree independence is necessary. MfE or EPA are best placed to effectively and efficiently address issues
177	Problem, e Objectives	A29	additional objective should be reporting that enables valid and credible benchmarking against trade partners and trade competitors
178	Problem, e Criteria	A29,	additional criteria is chosen option must allow for audits of data collection systems and processes. Necessary to ensure confidence in consistency and independence
179	options Alternative	A29	PCE will not hold a neutral starting position. It will not be in a position to "Bravely and constructively questioning the status quo". Furthermore, current assessments and data collection by agencies and local authorities will remain largely unchanged, and under this option there will be duplication in processes for data collection and aggregation, with minimal advantage. It is noted a central body collecting and collating the data must be adequately resourced, and this would most efficiently and smoothly be accomplished by consolidating this reporting requirement within the Ministry for Environment.
180	options costs and benefits	A29	The duplication of effort by separate agencies in collecting and collating environmental statistics could give rise to duplication in activities and conflicting information. This risk will be high if reporting is by the Parliamentary Commissioner operating outside the Official Statistics system
181	reporting pros and cons	A29	When implementing the proposed new roles and responsibilities for the Parliamentary Commissioner, it may take several years to establish smooth, efficient systems for consistent operation and delivery, and results are not likely to provide any significant practical advantage over strengthening the national consistency of existing monitoring and reporting systems. The option of using the PCE will introduce it to an operational function and undermine the current role of PCE
182	Monitoring problems	A29	The proposed amendment to the functions of the Parliamentary Commissioner for the Environment is not the cheapest and most efficient option to achieve consistent national level monitoring and reporting. The proposal to extend the regulation making powers under section 360 (Regulations) of the RMA to require local authorities to monitor certain variables of the environment (following specified methodologies and monitoring sites) to improve the consistency of state of the environment monitoring statistics at a national level, appears to be a reasonable process with which to achieve the objectives, and can be achieved most readily by strengthening existing systems. If the standardised methodologies and measuring sites are not well considered and agreed by all local authorities, there may be a risk that some important local issues will cease to be monitored and reported on. If the monitoring and reporting does not allow New Zealand to be benchmarked against international trading partners and trade competitors, then one key advantage of nationally consistent report will be lost.
183	Costs and high level costs	A29	Costs to local authorities have not been determined and require a detailed scoping study. There are assumed reductions in cost at central government level for collection and compiling of data, and these will be most readily realised by strengthening existing systems under MfE. The benefits listed are, in general, reasonable however the cost of duplication by requiring PCE to conduct a role already largely performed by MfE is not reasonable. Standardised methodology for monitoring and reporting at a local and regional level, is required under all options being considered.
184	Costs and benefits	A29	Improved consistency of environmental statistics and reporting will enable better assessment of the issues, risks and priorities at a national scale. It will improve confidence that local issues are being address to a consistently high standard. Some local authorities and agencies may require additional resources. Consistent national scale reporting provides an opportunity for improved benchmarking against international trading partners and trade competitors.
185	Problem, e Objectives	A30	objectives should also include "high quality monitoring techniques and data to support high quality statistics" in the last objective

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186	Other		A30, LR48	no mention made of data storage requirements, for example consistency in data format to aid efficient storage and transfer between agencies
187	Options	costs and benefits	A30	councils may find it difficult to resource and fund collection of data to standard and consistency necessary
188	reporting	pros and cons	A30	Pro: Using the Parliamentary Commissioner for the Environment brings a good level of independence to the process. The Parliamentary Commissioner for the Environment will need to be adequately resourced to undertake this work. Cons: Significant changes to some monitoring networks, if required by a s360 regulation it is difficult to modify monitoring networks or measured parameters in an adaptive management approach based on the collected data. The specific monitoring details as set at a national level may not be based on appropriate regional information. There needs to be considerable regional input before specifying in a regulation: variables, site locations, monitoring frequency, monitoring standards and by whom
189	Monitoring	problems	A30	It is useful to provide the Parliamentary Commissioner for the Environment flexibility on any additional domains they see fit to report on. There is some concern that the exact variables are not specified, there should be a minimum specific set that are required to be reported on and then provide flexibility to included others as the Parliamentary Commissioner for the Environment determines. This will remove the concern that councils and agencies are collecting data that may not be reported on.
190	Other		A31	IPENZ thinks the scope of the state of the environment reporting will need defining and tightening. Under the Environment Act 1986 the "environment" is defined broadly and includes "a) ecosystems and their constituent parts including people and communities; and b) all natural and physical resources; and c) those physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes; and d) the social, economic, aesthetic, and cultural conditions which affect the matters stated in paragraphs (a) to (c) or which are affected by those matters". We believe tightening and defining "state of the environment reporting" will be needed to ensure the reporting has reasonable boundaries and does not become an overwhelming task. We consider state of the environment reporting should focus on the physical environment, which appears to be the proposal's intended focus given the contents of the discussion document.
191	Problem, e	scale of problem	A31	IPENZ believes the inconsistencies listed on page 10 of the discussion document (which include inconsistencies in the variables being monitored and the frequency of monitoring etc) are significant and the limiting factor for understanding the state of the environment. There is also a bias towards those variables required by statute, regulation or national guidelines. Examples include microbial quality of coastal and river waters (required by the Ministry for the Environment and the Ministry of Health recreational bathing and shellfish guidelines) and air quality (required by National Environmental Standards). We think resolving these inconsistencies to be fundamental. Resolving inconsistencies will enable benchmarking and opportunities to consider why quality levels differ by region or by other parameters. This will enable discussion and debate about how activities, policies and practices affect different environmental domains. Once these issues are resolved, state of the environment reporting will be more straightforward
192	Problem, e	Objectives	A31	also transparent authentic measurement standards
193	Reporting	pros and cons	A31	Improved independence of state of the environment reporting, particularly as a result of the Parliamentary Commissioner for the Environment interpreting and analysing data, preparing reports and making recommendations Better mandatory data provision by regional councils and others. Regular, consistent reporting on the state of the environment. Cons: Increased costs of running the office of the Parliamentary Commissioner for the Environment, given its increased role, including increased resourcing competent staff to ensure reporting is robust and defensible. Potential need for the Parliamentary Commissioner for the Environment to establish new relationships with other agencies (e.g. regional councils and the Ministry of Fisheries (now in the Ministry of Agriculture and Forestry) to be able to obtain the data it needs for state of the environment reporting. We are unclear as to whether data from regional councils will be provided (a) direct to the Parliamentary Commissioner for the Environment or (b) to the Ministry for the Environment, with the Ministry then passing it on to the Parliamentary Commissioner for the Environment. Our interpretation is that the proposed option is option (b). We consider this to be preferable and recommend all collected information be publicly available so New
194	Costs and b	other	O32	WIC's main concern with the proposed monitoring is that it will potentially lead to duplication, over-monitoring and greatly increased costs; namely at the regional and local levels. As was described in the discussion document, local authorities currently undertake their own monitoring in order to discharge their duties under the Resource Management Act (RMA). However, the introduction of national monitoring standards will not remove these RMA duties. Instead, it will potentially simply lead to another layer of monitoring in addition to that which is already being undertaken by local authorities. In effect, local authorities may not reduce or change the amount of local monitoring that is undertaken to meet their own requirements. This could see the amount of monitoring being undertaken increasing substantially, with the cost being passed on to land owners or resource users. The monitoring which is to be undertaken (at the national and sub-national levels) needs to be meaningful and useful
195	Other		A33	This opportunity to develop meaningful reporting about the marine environment at a national scale will require rigorous time series of data that extend beyond the coast and the RMA's jurisdiction to be effective. We would like
196	Problem, e	issues	A33	Issue 2. We believe that there are two issues here. The first is that MfE appears to be unaware of existing data sources and indicators collected by other agencies in the ocean domain, or that these data are not collected in a co-
197	Costs and b	benefits	A33	The "informal" analysis should be available for stakeholders to see. We suspect that "informal" is code for "back of the envelope". We find this sort of approach unacceptable given the software and methodologies available to fo
198	Problem, e	issues	A33	It is not just about New Zealand's environmental performance, but our achievements in meeting the blue-green growth agenda, and our ability to demonstrate that new developments are undertaken and are remain within enviro
199	Other	SOE reporting	A33	We observe that biodiversity, the economic evaluation of biodiversity, biosecurity and ecosystem services and the review of environmental statistics by Stats NZ are missing from this discussion. This needs to be rectified.
200	Problem, e	issues	A33	Yes we think there are a few other issues that could be addressed by this Bill. (a) National level environmental reporting (extend scope beyond RMA), (b) 12nm reporting (provides details) (c) Integration of national and local repo
201	Problem, e	Criteria	A33	We do not see how the proposal will lead to criterion A being met. The government is giving very mixed messages about its commitment to independence. For example, fisheries science is struggling to be seen as i
202	options	Alternative	A33	We suggest that provisions under the Statistics Act should be dove-tailed with regulation powers under the RMA, i.e. options 2 and 3 in the Summary Table page 19.
203	options	Alternative	A33	To extend to the full ocean domain, it may be necessary to amend legislation for CRIs, DOC Maritime New Zealand and Mfish (MAF).
204	Reporting	pros and cons	A33	Pros One clear lead; Cons No clear roles for other agencies or the process for engagement and efficiency of effort, or data management
205	Other		A33	Suggested amendments to table 3: * Include other agency functions and responsibilities to contribute to the reporting e.g. EPA, Mfish, DOC. * Add more detail so it is clear e.g. MfE will still carry out functions of
206	Monitoring	problems	A33	* Good coverage of inconsistencies in regional environmental monitoring programmes identified (pg 13) but these do not need to be detailed in legislation. This is far too prescriptive and will be difficult if not impo
207	Costs and b	Other	A33	A benefit is that environmental reporting should also be scanning for emerging problems in the environment. A more co-ordinated approach will improve investment and innovation in developing new approaches f
208	Other		LR35	The Council already has multiple requests to access their data from a range of users including government and consultants. They are developing a web-based portal to proactively manage their data.
209	Other		LR35, A43, O45	discussion document is very high level and does not contain sufficient detail to enable submissions on the substantive details and implications of these. (including comments on costs and benefits). Details of many issues and challenges are not identified or addressed
210	Problem, e	Issues	LR35	With regard to Issue 2, it is the regional council's view that the discussion document does not articulate the basis for difficulties in national reporting due to differences in regional environmental monitoring. In pa
211	Problem, e	Issues	LR35	the data for environmental reporting will not necessarily be the same data that is required for policy development. The discussion document does not adequately cover the distinction between data that tells us a
212	Problem, e	scale of problem	LR35	contains minimal evidence to suggest that differences in regional state of the environment monitoring are a cause for concern or are frustrating national reporting. There is limited discussion on the different asp
213	Problem, e	Criteria	LR35	Any preferred option should require consistency in environmental monitoring across all regions in New Zealand (to the extent that it does not conflict or impact unnecessarily on regional monit
214	Problem, e	Criteria	LR35	Any preferred option should provide a cost-efficient way to achieve consistency in regional environmental monitoring for national reporting purposes. The solution should be able to be implemented with minimal administration and compliance costs.
215	options	Alternative	LR35	Options such as regional government reporting with Parliamentary Commissioner for the Environment / independent auditing, etc. don't appear to have been considered
216	options	address problem	LR35	The option to amend the Environment Act to require the Parliamentary Commissioner for the Environment to produce a state of the environment report every five years seems appropriate to address the associ
217	options	costs and benefits	LR35	For Option 2, the council considers that the following costs need to be explored prior to any legislative amendments: *Increased costs to regional councils and ratepayers. *Difficulties in achieving devolved poli
218	Reporting	pros and cons	LR35	Independent regular national state of the environment reporting will provide an evidential basis for New Zealand's environmental credentials and could meet international reporting requirements. It could, depending on the indicators and data assembled, also allow for the identification of national environmental trends and emerging issues. This should support national environmental policy-making
219	Reporting	Domains	LR35	'biodiversity' should be disestablished as a standalone domain and included within the fresh water, land, and oceans domains. This is consistent with an ecosystems approach and allows for better illustration of
220	Costs and b	high level costs	LR35	The discussion document does not identify the value to New Zealand of independent and regular national state of the environment monitoring (i.e. is it for national branding purposes or to comply with OECD requirements etc.).

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221	Other		A36	There is a need to build from existing biodiversity monitoring systems, e.g. national wetland monitoring system; permanent forest and grassland plot monitoring systems; LENZ; and Department of Conservation
222	Monitoring problems		A36, R37, O45,	Resourcing of agencies e.g. regional councils with limited capacity is needed. They need resources to undertake standard agreed monitoring of key indicators, e.g. changes in land use, wetlands, lowland forests, indigenous vegetation and habitat loss
223	Problem, e issues		A36	The issue is not just a lack of statutory obligation in New Zealand for regular and independent monitoring (e.g. RMA Section 35 currently includes requirements for state of the environment monitoring) but a lack of focus by government agencies on biodiversity monitoring, particularly monitoring on private land (Q 2). Agencies need to work together with local government and private landowner representatives (e.g. QEII National Trust, Nga Whenua Rahui, and NZ Landcare Trust) to achieve standard systems, that have integrity, and provide co-ordinated results at a regional, national and international level.
224	Other		A36, R37, A59	Data needs to be publically available and communicated
225	Problem, e Criteria		A36	The assessment criteria (Q 5) are fair; however, the wording in this section should be changed. We recommend that "Effective and trustworthy reporting must be upfront and free from perceived bias" (Assessment criterion B, p. 15) be changed to "Effective and trustworthy reporting must be upfront and unbiased".
226	Costs and benefits		A36	The benefits arising from the proposals for an Environmental Reporting Bill need to be re-worded (p. 27, Q 16), as the current wording is inconsistent with the objectives of the proposal itself. One of the
227	Problem, e Objectives		R37	The objective(s) of monitoring need to be clearly stated such as to guide the design of sampling programmes and selection of indicators that address the desired outcome. For example the objective of monitoring the effects of particular activities will require a different sampling design to one of providing an unbiased estimate of the ecological condition within a particular geographic domain. A case in point is the very recent CV "Rena" ship grounding. The ability of New Zealand and/or environmental, commercial or iwi groups to successfully litigate will depend on the robustness of environmental information available prior to the incident by which impact can be quantified.
228	options	Alternative	R37	The Institute is of the view that provision must continue to be made for regional reporting that is of significance at that scale. Some matters are only relevant to certain regions based on their environmental character, key industries and land uses, and significant habitats and species. Regional reporting should be taken up into a broader national reporting framework to reflect the unique characteristics of each region.
229	Monitoring problems		R37	Some ecosystem types currently not monitored due to lack of research to provide basis for monitoring and methodologies and difficulty accessing resource to measure it
230	Other		R37	monitoring and reporting needs to be audited or peer-reviewed
231	options	Alternative	R37	There are numerous alternative ways to address the coordination of national monitoring and reporting. For example, a new organisation could be formed to address this matter and a host of other ones around the country. Alth
232	Costs and benefits		R37	The availability of high quality environmental monitoring information will have significant benefits including: *International environmental reporting will be easier, more edifying and will make clear the state of the New Ze
233	Problem, e issues		A38	The issue of added cost has not necessarily been fully identified – It is plausible that an added intensity and or frequency of data collection may arise from a national framework in some aspects and /or
234	Costs and benefits		A38	To the extent that costs may increase this has to be offset by the benefits that will accrue to the nation long term from better informed policy formulation, public process and land use. It is suggested that
235	Monitoring		A38	FOA seeks that the proposed reform ensures that the Regions capture sector specific data of utility for central government reporting, including M's Montreal Process reporting for temperate forests, wh
236	options		A38	concerned a potential conflict may arise where by requests for the types of data sought by the Parliamentary Commissioner are not supported by recommendations from the Minister for the Environmen
237	Monitoring		A38	FOA believe that one area that requires careful thought (Q14) will be the way in which the relationship between the PCE's office and the Ministry for the Environment and other Government Department
238	Costs and t high level costs		A38	FOA also notes that added benefits should be accounted for in terms of the economic leverage obtained by establishing nationally significant datasets and implementing new technologies for deriving
239	Reporting methods for analysis		R39	could use pressure-state-response model to report of sustainability frameworks such as resources/processes/outcomes framework
240	Monitoring		R39	
241	Reporting		R39	Paper emphasises consistency in statistics when might be more appropriate to emphasis "relevance" of environmental statistics. Provides several examples
242	Monitoring		A40	The discussion paper also highlights the importance of trends. Trend information is very important for state-of-environment reporting. However it is also important to get information on the cause of the trends. There is a very good exam
243	Costs and benefits		A40	Existing monitoring programmes by local authorities should be re-configured, where necessary, to contribute to a consistent and comprehensive national dataset upon which credible national state of the environment reports can be based.
244	Costs and benefits		A40	the revised reporting regime should not impose additional cost on land users
245	Problem, e issues		CG41	any additional cost must be shared equitably among beneficiaries, remembering that there is a large element of public good associated with SOE reporting
246	Options		CG41	Environmental issues that are faced by local authorities may not be uniform across the country that will require some degree of flexibility in monitoring requirements that recognises this diversity.
247	Reporting pros and cons		CG41	The Ministry of Health supports the proposed legislative requirements to enable independent state of the environment reporting through the Parliamentary Commissioner for the Environment (PCE). However the Ministry of Health actively shares information with the Ministry for the Environment and vice versa. The Ministry of Health would appreciate some assurance that such an arrangement would continue with the PCE.
248	Monitoring		CG41	Legislation will assist in delivering an improvement in the quality and consistency of environmental data and reporting. However investment will be necessary to ensure that robust criteria are developed to be assist in the development of indicators and monitoring networks that are suitable for national state of the environment reporting and are compatible with other reporting regimes such as the Ministry of Health's environmental health indicators programme.
249	Other		O42	Any state of the environment reporting will need to be linked to actions/pathways necessary to address problems and should be clearly reflected in any proposed RMA amendment.
250	Costs and benefits		O42	Our view is that it is vital New Zealand entities enhance the quality of their reporting on environmental, social and economic well being, not only by Central and local government but also by other significant entities within New Zealand. We see this best occurring within a "integrated reporting" framework – a framework that takes into account both vertical and horizontal integration. Integrated reporting is a single document which provides a clear assessment of an entity's financial, social and environmental performance
251	options	Alternative	A43	may affect our position as a nature in the international arena
252	Problem, e Issues		A43	Should be role of MFE, not PCE
253	Problem, e issues		A43	Has significant doubts as to the characterisation of the problem of lack of independence. Suggests *independence is just one of a basket of quality-related characteristics, *the NZ proposal is at odds with international comparators, *changing governance arrangements is unlikely to be 'fit-for-purpose'. Argues that independence is not really needed.
254	Problem, e Objectives		A43	BusinessNZ would have liked to have seen a discussion about how the proposals will advance New Zealand's growth agenda, and more specifically, the Government's green growth agenda. Generic statements about the New Zealand's clean and green image are interesting, but not a sufficient basis on which to make regulation.
255	Problem, e Objectives		A43	However, it is unclear why the role of state of the environment reporting must be independent of Government. This objective potentially makes a sham of the consultation process as it can only lead to one outcome - delivery of the report by a non-Governmental agency (such as a University or some other suitably qualified third party) or an Office of Parliament. As such, it biases the outcome towards the preferred solution.
256	Problem, e Criteria		A43	In BusinessNZ's view, the second objective should be reworded to reflect a desire to have a high-quality report delivered. For example: "The state of the environment report is credible, and can be relied upon by its users to reflect a balanced ap
257	options		A43	There is no assessment criterion that relates to the need for the solution to the reporting requirement being the least net-cost option. This needs to be added. In addition, it is unclear what the criterion "Be cost-efficient" in the context of
258	options	highest net benefit	A43	Options assessed are too narrowed and focused on independence. This has skewed the options
259	Monitoring		O44	BusinessNZ considers that if the broader set of quality-related characteristics was taken into account, the Ministry for the Environment option for environmental reporting (under a legislative mandate) would be most likely to deliver the highest net-public benefit.
260	Other		O44	wish to ensure proposed monitoring legislation will result in the following outcomes *greater environmental reporting efficiencies and avoidance of duplication in monitoring and reporting, *information compiled by Watercare can be better utilised as part of the national reporting, *information compiled can be used to provide baseline information
261	Costs and benefits		O45	can offer experience with development of monitoring standards and would like to be included in this
				Expect benefits will mainly be at national level

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262	Other		O45	Use of s36 or RMA to recover costs from consent holders for SOE monitoring
263	Other		O45	Need to clarify purpose of SOE monitoring and reporting, including if for national or regional purposes, and consider alternative funding sources to reduce cost to councils and consent holders
264	options	Alternative	O45	Amend RMA to clarify purpose of SOE monitoring and reporting and clarify funding arrangements
265	options	costs and benefits	O45	cost to regional councils will increase and it is enviable some of this will be passed onto consent holders
266	Monitoring		O45	should also amend s35(2) and s36 of RMA because s36 relates to funding arrangements
267	Problem, e	Issues	O46	proposal is flawed because it excludes Environmental statistics generated from reporting via other environmental related Legislation; Environmental information collected by central government agencies, Crown research institutes and universities. The proposal while commended would reinforce: Silo thinking; Confusion in the 'marketplace'; Inconsistencies regarding methodologies; Inconsistencies in quality and frequency of data and in some instances may require entities to report environmental data to multiple agencies.
268	Problem, e	Issues	O46	Not appropriate for PCE to prepare reports because would be like asking the Controller and Auditor General to prepare accounts for all the agencies it audits. PCE could legitimately audit the environmental reports and information underpinning these.
269	Problem, e	Issues	R46, A62,	Reporting should be done by the Government Statistician or a least under his/her overview as outlined in Part 1 of the Statistics Act 1975 (s3-11)
270	Problem, e	Criteria	O46	Suggest using some of the criteria from "Towards Integrated Reporting" page 12 (www.theirc.org) - strategic focus, connectivity of information, future orientation, responsiveness and stakeholder inclusiveness, and conciseness, reliability and materiality.
271	Problem, e	Criteria	O46	Two key questions are who is the reported data intended to be used by? And for what purpose?
272	options		O46	Number of councils have participated in Quality of Life Reports (www.bigcities.govt.nz) and would seem natural for this to be linked with proposed reporting
273	options	problems	O46	It also fails to draw another set of linkages of which perhaps the most significant is the type of reporting embodied in the Government Statistician's report "Measuring New Zealand's Progress Using a Sustainable Development Ap
274	Reporting		O46	PCE role would be compromised so suggesting alternative option of government statistician
275	Monitoring		O46	With the reporting and allied functions being performed by the Government Statistician rather than the Ministry for the Environment it is possible existing powers of the Government Statistician may be su
276	Costs and b	high level costs	O46	The key benefit(s) of improved environmental reporting is NOT referred to in the discussion document and this seems quite odd. The key purpose of improved national environmental reporting is to in
277	Costs and b	high level costs	O46	Consideration should be given to the data to potentially being used as part of the information used in for full cost accounting projects e.g. effects of the issuance of consents for open cast mining, hydro s
278	Problem, e	Issues	R47	document does not cover WHY national monitoring and reporting is important
279	options		R47, A62	suggest a standalone Environmental Reporting Act rather than amending existing Acts to increase visibility and profile of environmental monitoring and reporting
280	Monitoring		R47	Currently little information collected to underpin trends in coasts and ocean states
281	Monitoring		R47	Document does not recognise role environmental scientists play in designing robust and efficient and consistent monitoring and reporting systems
282	Monitoring		R47	Monitoring and modelling are different sides of same coin and both are needed in environmental management. Can help reduce number of monitoring sites needed and identify appropriate locations for sites
283	Other		R47	GNS work with councils is recognised on page 9, but not NIWA's National Water Quality Network which is also linked with councils
284	options		R47	Cost of environmental science to underpin this work and design a robust monitoring and reporting framework
285	options	highest net benefit	R47	requiring monitoring will have greater net benefit to NZ
286	Costs and benefits		R47	cost of science input to design and devise on consistent, robust and interoperable monitoring. Also co-benefits form using quality-controlled environmental data
287	Costs and benefits		R47	NIWA can provide info on costs and benefits of monitoring air and water (freshwater, coastal, estuarine and oceans, and water biodiversity)
288	Reporting		LR48	Agrees PCE should be free to choose data sets and indicators to use
289	Reporting	Domains	LR48	Considers focus of domains is too narrow. Previous SOE report had 10 domains and OECD uses 13. Domains should be widened to be consistent with OECD. Also need to recognise social, cultural and economic components and use pressure-state-response framework. Also oceans is too broad and should be split into 'estuaries, harbours and coasts' and 'oceans'
290	Reporting		LR48	how will PCE request changes to the regulations to obtain the data she needs? Not clear how this will work in practice
291	Monitoring		LR48	Need to make use of existing monitoring and data as much as possible
292	Problem, e	Issues	LR48	The issue statements do not currently comment on the purpose/objectives of the national level state of the environmental monitoring and reporting. What and why are we reporting at a national le
293	Problem, e	Objectives	LR48	Objectives should include no additional cost to local govt
294	Options		LR48	preferred option does not address aim of providing consistent, independent, national-level SOE report
295	Options	costs and benefits	LR48	There are also a number of costs associated with the preferred options. The local authorities will require resourcing to collect data. Any changes to indicators and/or methodology may make ex
296	Problem, e	Issues	LR49	Do not agree there is a problem with inconsistency between regional council monitoring programmes and that they require standardising
297	Costs and benefits		LR49, LR23, LR2	More CBA work is needed before requirement for regional councils to do work is drafted and notified for submissions
298	Other		I50	need to acknowledge settlement between Waikato-Tainui and Crown and that integrity of the co-governance and co-management arrangements from the settlement are upheld and acknowledged as part of any new legislation that determines objectives for environmental wellbeing. Would include Waikato-Tainui participation and views being taken into account. Joint-management arrangements include monitoring and enforcement, including agreeing monitoring priorities and methods
299	options	Alternative	I50	Issues: 1. Regularity, and 2. Enforcing the requirement to change policy and planning documents in response to environmental information 3. Confirming participation of Maori in the developing of environment
300	Problem, e	Issues	I50, N72	Issue is REGULAR and INDEPENDENT report - focus is on independence, not regular which is also important
301	Other		R51	Why is current voluntary approach of MfE working with councils to get data not working?
302	Other		R51	Ornithological Society has carried out long-term monitoring of bird populations (submission contains more details)
303	Problem, e	Objectives	R51	objectives are necessary, but are they sufficient? Who will be responsible for selecting variables and parameters to be measured?
304	Reporting	pros and cons	N53	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 Parliar
305	options	Alternative	N53	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
306	Other		A55	Our key messages are: 1) That environmental reporting in New Zealand should be improved; 2) That environmental reporting should have a clearly defined purpose and value proposition; 3) That stronger links between environm
307	Monitoring		A55	Suggest using an ecosystem services framework because this would link environmental, economic, social and cultural values with functioning of ecosystems to allow for management of ecosystems within their natural limits
308	Problem, e	issues	A55	There are several other issues that should be considered: monitoring of regions beyond territorial authorities, the need for clear objectives in monitoring, and the gap between regionally-relevant data and nationally-relevant dat
309	Problem, e	scale of problem	A55	Regional authorities are often well aware that there is inconsistent state of the environment reporting. Equally, there is a good deal of consistency. The inconsistency is not driven by a lack of will but by a lack of resources. The situation could be improved without further changes to legislation by creating a standard repository for information
310	options	Alternative	A55	Rather than existing government bodies of CRIs/Universities, the reporting could be carried out by a new institution (for example, a Common Asset Trust) which would include multiple stakeholder perspectives including science to ensure "fitness for purpose" at multiple scales. Whichever organisation becomes responsible for environmental reporting, that organisation will require the expertise to carry out the duties placed upon it. This capability and capacity should be sufficiently resourced
311	options	preferred options	A56, O65, R68,	The proposal to have the Parliamentary Commissioner for the Environment (PCE) responsible for environmental reporting is, however, not supported, chiefly because capability and capacity to do the job would have to be built largely from scratch. As well, the skills and resources required for the task already reside elsewhere. Should be Stats NZ instead
312	Monitoring		LR58	Resource parameters measured should not exceed minimal relevant set at each location

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313	Monitoring		LR58	monitoring locations must remain risk and management based
314	Monitoring		LR58	Methods for 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
315	Problem, e options	Issues	A59	how will SOE reporting interact with goals of NPS? NPS on freshwater provides guidance on monitoring and reporting
316		address problem	A59	The Society considers that the report has clearly identified many of the issues related to the current SoE reporting. The extent to which SoE reporting will provide capacity to make a real environmental difference in the case that issues are identified, however, remains uncertain. Such actions may include additional monitoring but more importantly, where negative trends are apparent, actions taken to address the source of the problem and to rectify it. In this case the issue becomes one of interactions with the National Policy Statements. The fact that the NPS in Freshwater Management may allow some regional councils up until 2030 to put in place an adequate monitoring framework (let alone lead to an enforcement obligation), is cause for concern.
317	Reporting		A59	State of the Environmental reporting should be associated with plans, policies and regulations that will directly address any identified environmental problems as well as identifying where it is possible to increase the resilience and biodiversity of natural ecosystems to mitigate for the potential effects of a changing world (e.g., increasing human population, greater environmental variability and climate change).
318	Monitoring		A59	The issue of most significance to the Society is the way in which SoE reporting is linked to actions undertaken by regional councils and unitary authorities. There needs to be clearly identified pathways taken to address problems and these should be embedded within the RMA legislation.
319	Monitoring		O60	a number of monitoring roles require different info e.g. SOE reporting, environmental policy making, effectiveness and efficiency plans and policy statements, consent conditions compliance
320	Costs and benefits		O60	costs should be attributed to a wider constituency through a method such as a general or targeted tax or rate, Cost recovery model like this is used by ECAN
321	Problem, e options	Issues	N61	there is a lack of reported data in many key areas e.g. oceans, fisheries, marine protection, sedimentation. Suggest there is a lack of resources or expertise of some local authorities to undertake monitoring. There are many obligations under RMA that are not complied with by local authorities who commonly cite reasons as lack of resources, or a decision by elected councillors
322	Problem, e options	Criteria	N61	Do not agree with explanatory comment that the solution should be able to be implemented with minimal administration and compliance costs if this entails reducing or significantly limiting the matters to be monitored.
323	options	preferred options	N61	EDS does not consider Stats NZ has the necessary expertise to report on SOE
324	options	Alternative	N61	One alternative option would be for the EPA to provide oversight and support for all of local authorities' functions under the RMA including overseeing the development and implementation of a national monitoring framework. The EPA would be the better agency to liaise with local authorities and implement the system, as the Ministry for the Environment is focused on policy development not operational issues. Under this alternative option the PCE would still be responsible for preparing the regular state of environment reports which would draw on the monitoring data.
325	options	Alternative	N61	Another alternative option could be to form a separate entity to fulfil the role of an environmental auditor. However, it is considered that this is unnecessary as the Parliamentary Commissioner for the Environment already has responsibilities to review environmental systems and Government policies.
326	options	address problem	N61	The options will largely address the problems identified in the discussion document. It is important that the regulation or national environmental standard that prescribes the aspects of the environment to be monitored is sufficiently detailed and is designed to measure those aspects that will demonstrate key environmental trends and enable timely management responses to be implemented. The monitoring of certain indicators can indirectly measure other possible indicators. There needs to be adequate input from scientists about these matters and the key aspects of the environment that should be monitored. Further measures will be required to address the resourcing issue as discussed above.
327	options	costs and benefits	N61	As acknowledged in the discussion document, the magnitude of cost increases for local authorities will largely be determined by the extent to which the existing monitoring programs will need to be changed and the cost of any new monitoring measures.
328	Monitoring problems		N61	One potential problem with the proposed RMA amendment is that the public and stakeholders may not be afforded the opportunity to participate in the development of regulations, whereas the development of a national environmental standard sets out a clear process for public and iwi involvement. Conversely, a regulation may allow greater flexibility to amend the monitoring requirements if it is considered that a different aspect of the environment should be monitored.
329	Costs and t	high level costs	N61	EDS considers that the main high level benefits have been accurately identified. In particular, EDS submits that the information should result in earlier detection of environmental problems and consequently better national environmental management de
330	Costs and t	high level costs	N61	An additional high level benefit of state of the environment reporting is that it enables policy makers and the public to assess whether measures implemented to address environmental problems have been effective and respond accordingly.
331	Costs and benefits		N61	EDS does not have any specific information to be included in the final cost-benefit analysis. It considers that the analysis should include ways in which the costs can be minimised and the benefits enhanced. For example, sharing information between agencies would reduce duplication, and selecting key indicators which indirectly measure other aspects would reduce the need to measure all of these aspects separately thereby reducing the cost of compliance.
332	Other		A62	reporting should be independent of government AND sectoral influence. It also shouldn't become a vehicle for environmental advocacy
333	Other		A62	PCE more aligned with advocacy. This sense of true independence is absent from the assessment provided in the discussion document (pages 17 – 18) of different offices / agencies which could be assigned responsibility for preparing the report. The discussion document favours the Office of the Parliamentary Commissioner for the Environment (PCE) for the role, apparently on the basis that she is independent of the government. However the statutory role of the PCE is an explicitly pro-environment one. The PCE herself, in her 2011 annual report, recalls that the term "watchdog" was used to describe her office when the role was initially debated in Parliament.
334	Reporting	pros and cons	A62	If the role of producing a state of the environment report is ultimately assigned to the Parliamentary Commissioner for the Environment then the necessary amendments to the Environment Act 1987 should: a. provide explicit d
335	Costs and benefits		A63	NZIF agrees that our high quality agricultural exports and lucrative tourist industry rely on environmental credentials and notes that the contribution made by these sectors in maintaining NZ's clean green image may be inversely proportional to the value they receive. NZIF agrees that our high quality agricultural exports and lucrative tourist industry rely on environmental credentials and notes that the contribution made by these sectors in maintaining NZ's clean green image may be inversely proportional to the value they receive.
336	Problem, e options	Issues	A63	The NZIF believes that achieving high quality, consistent national environmental reporting is more than merely assigning the responsibility for a five yearly report to the Parliamentary Commissioner for the Environment and legislating standardised methods of assessment by regional councils. National reporting, by definition, requires top-down specification of the methodology. It is therefore logical that methods and data collection be managed centrally rather than at regional council level. There is merit in maximizing the benefit of nationally managed specialist skill-sets rather than having regional duplication.
337	Other		A63	National environmental reporting must be able to assess and report on both the good and the bad in our environment, without fear or favour, and to be able to detail issues and action that might be needed for improvement, if the intent of not just reporting the state of the environment but also of improving environmental management is to be achieved
338	Costs and benefits		A63	Regardless of which agency has responsibility for them, national systems must be adequately resourced and directly funded by government, with no opportunities for shortcuts and cost saving that will compromise the accuracy and authority of the final national report and which can particularly affect trends over time
339	Costs and benefits		A63	National environmental reporting also needs to be justified and paid for explicitly and openly at the national level. It requires explicit cost / benefit justification for the expenditure that should be produced before that expenditure is incurred. Such justification needs to specify clearly the objectives of the national environmental report.

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340	Problem, e	Issues	A63	Not convinced lack of statutory obligation is main problem. Statutory obligation still requires commitment from govt of the day to provide funding and resources. Agree statutory obligation will help ensure funding and resourcing is available.
341	Problem, e	Issues	A63	There will be issues concerning how monitoring might be implemented to provide a state of the environment report, but resolution of these may need to await higher level decisions on whether or not there is to be a statutory obligation and which agency would be responsible for completing such obligation.
342	Options	Alternative	A63	Consideration could have been given to the establishment of a national environmental monitoring and reporting agency, as a clearly defined subsection of one or more government agencies and possibly located with
343	Options	costs and benefits	A63	The cost of designing a national inventory or sampling system and actually collecting the data does not seem to have been included.
344	Reporting	Domains	A63	There are problems with too much specificity in what comprises "the environment" in that it is easy to overlook some factors that might be, or might become very significant to the New Zealand brand. Just looking
345	Monitoring	problems	A63	The RMA in practice has resulted in a focus on the local and the short term. There is a risk that the local and short term determination of the 'significance' of adverse effects by Regional Councils may overlook accu
346	Monitoring	Domains	A63	The NZIF does not support progressive introduction of sectors to national reporting. A progressive approach cannot logically represent 'national' data for the period the full set of monitoring is not undertaken. A pr
347	Costs and benefits		A63	If New Zealand's state of the environment reporting is currently considered inadequate, then it is unlikely that there will be cost reductions by making it better. Devolving costs to another entity (say from the Minist
348	Costs and benefits		A63	There is a possibility that data collected under a national system may assist or reduce the work load of Regional Councils and others. Coordination between the different environmental data collectors and users need
349	Costs and benefits		A63	The cost of designing a national inventory or sampling system and actually collecting the data. The benefits that arise from purposes other than reporting that can arise from the provision of statistically sound nation
350	Costs and benefits		LR64	monitoring can be significant cost for local govt. Any alternation to monitoring requirements will impact on local govt and their communities through long-term planning cycle. Increased monitoring cost likely to result in reduction in levels or numbers of services that local govt can carry out on behalf of its community. Therefore appropriate funding mechanisms and capacity building must be part of any changes
351	Costs and benefits		LR64	potential cost if information on trends is lost if a parameter that has been monitored for a long period is changed or disestablished. Long-term monitoring adds to knowledge each year so changes to parameters results in a loss of cumulative knowledge
352	Problem, e	Objectives	A67	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.
353	Other		A67	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. [link to comment 136 on regional variation???
354	Monitoring		A67	INZ understands other OECD countries have national indicators that are not 'all encompassing' and therefore recognise regional variability
355	Problem, e	Criteria	A67	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?
356	Reporting	Domains	A67	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.
357	Costs and benefits		A67	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.
358	options	Alternative	R68	We disagree that the preferred options will help make substantial progress in solving the current issues with environmental reporting or provide the most effective and robust solution to achieve the goal of separation of policy-analy
359	options	Alternative	R68	Our overall assessment is that until such time as environmental information and statistics are afforded the same status as other essential information (e.g. economic, population, production, health, social), very little will change. We
360	Problem, e	Objectives	R68	Any solution for progressing environmental monitoring and reporting must provide guidance on the desired outcomes of the monitoring. These outcomes will help to define what information is gathered and how it is reported. Poss
361	Problem, e	Issues	R68	several other issues must also be addressed if the problem of environmental reporting is to be rectified, including: 1)clearly delineating the roles and responsibilities of different ministries, departments and institutions contributing to
362	Problem, e	Objectives	R68	need robust methods and procedures that are available for scrutiny and audit
363	options	address problem	R68	Submission contains detailed tables assessing how options address the problems. Preferences are Stats NZ option instead of PCE and not clear preference for RMA amendment option
364	options	costs and benefits	R68	current analysis substantially underestimates costs involved in transferring SOE reporting to PCE from MfE
365	Reporting	pros and cons	R68	The pros of the proposed amendment are: *mandating production of an SoE report. *outlining a minimum set of environmental domains to cover but leaving open the possibility to include others.
366	Reporting	timeframes	R68	need to monitor so can detect whether or not certain trends, strategies and policies might lead to undesirable or irreversible outcomes and what causes those changes. Monitoring for outcomes becomes an imperative
367	Monitoring		R68	The proposed RMA amendments would be a positive step towards achieving more integrated and coordinated environmental monitoring to support national (actually multi-scale) SoE reporting. However, the current proposal suffers
368	Monitoring	Domains	R68	Rather than prioritise one domain over another, we recommend: a)prioritising data and indicators in each domain. B)outlining a process for improvements and consistency considering all domains such that some progress is made
369	Costs and b	high level costs	R68	Regarding regular, independent reports, we perceive two additional high-level benefits: A)SoE reporting at the national level is regularised and no longer subject to divisions of individual governments, ministers, or department exec
370	Problem, e	Issues	R69	Is about irregular reporting, not inconsistent reporting - word inconsistent is wrong word to use
371	Problem, e	Objectives	R69	I agree with all except "The role of state of the environment reporting is independent of Government". Realistically, the data sets and the monitoring are funded directly or indirectly by the Government
372	options	address problem	R69	Option partially address problems. Report can only be prepared by experienced science teams
373	options	costs and benefits	R69	Cost of science teams. Benefits are improved data for designing interventions and mitigation where need to improve state of environment and for teaching in Universities and schools
374	options		R69	The PCE office would struggle to prepare a comprehensive and accurate state of the environment report, if the PCE office was funded to do environmental reporting it would need to expand and consume funding that could be u
375	Reporting	pros and cons	R69	This cannot be left to the PCE of the day to decide what to report on. Comprehensive reports on all internationally recognised domains should be regularly reported on by the experienced hands of CRI and University science tear
376	Other		O70	High quality and accessible environmental data will be important in further defining the cause and effect relationship between SOE and human health. Can assist in evaluating effectiveness of current and future interventions
377	Problem, etc		O70	Environmental data used to help form policy and improve population health should be as free from bias as possible
378	Monitoring		O70	Concerned about what will happen to existing monitoring results and that changes in monitoring strategies/methodologies may postpone action for environmental concerns that have already been identified given lack of continuity of data
379	Other		O70	Suggest legislation mandates overall reporting framework, the domains, organisation responsible for report production. Is not role of legislation to specify details of environmental variable monitoring such as sample sites and sampling methodology. Could use existing guideline documents to provide these details.
380	Costs and benefits		LU71	benefits of preferred option accrue at national level while costs accrue at regional level.
381	Problem, e	Objectives	LU71	Objectives should be wider to capture the environmental well-being of NZ. Primary intent is to meet govts OECD reporting requirements and wider monitoring objectives are overlooked
382	Other		LU71	Legislation alone will not necessarily deliver an improvement in quality and consistency of environmental data for national reporting. Investment is required to develop robust protocols, indicators and monitoring networks
383	Other		LU71	document present an unbalanced argument, stressing problems associated with MfE being reliant on data from other agencies whilst not recognising benefits of this arrangement. MfE has access to huge amount of information at very little cost
384	Problem, e	Issues	LU71	document states MfE has worked with local govt to try to improve consistency, but this has not worked. Would be useful to provide evidence of how they have worked with local govt and how they determined this has failed
385	Other		LU71	Document ignores responsibility of MfE to develop and monitor appropriate national environmental indicators. Instead local govt is charged with failing to meet govts information needs
386	Monitoring		LU71	Local authorities must respond to needs of, and be accountable to their rate payers
387	Monitoring		LU71	there is a risk national monitoring required by regulation may take priority over regional monitoring

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388	Monitoring	LU71	local authorities are custodians of some of longest and most powerful environmental datasets in country. Enforcing change may compromise these datasets when they need to be preserved	
	options	LU71		
389			many of the standard approaches to environmental monitoring have arisen through innovation by local authorities. Regulation increases risk this innovation will be replaced by regulation-led, minimalist approach to monitoring, identifying issues and addressing environmental issues	
390	options	LT73	status quo cannot be seen as cost efficient option because does not produce high quality environmental statistics (see Table 2 pg 19)	
391	Other	N72	That the boundaries the report is aiming to report upon are represented more accurately in its title. A more appropriate title could be 'The State of New Zealand's Natural Capital' or 'The State of New Zealand's	
392	Problem, e Issues	N72	The two issues addressed in the discussion document are expanded to three. The three issues are: Issue 1: There is a lack of statutory obligation in New Zealand requiring regular state of the environment rep	
393	Problem, e Objectives	N72	That the 11 objectives to be used to assess options are as follows: 1. Ensure the title corresponds with the content (new). 2. Make the content relevant, assessable and cost-effective (content). 3. Collect regic	
394	options	Alternative	N72	We believe that five different institutions are required to work together to meet the ten objectives above. This means that the five-yearly report involves five stages, each fulfilling a distinct role. Stage 1: Data C
395	Reporting	timeframes	N72	Statistics New Zealand provides an 'Annual Regional Report Card', based on the data returned from local authorities. These annual reports would form the basis of the five year reports (see Recommendation 4
396	Reporting	Domains	N72	That domains are left to the EPA, Statistics New Zealand and other interested parties to develop in consultation with the public; however, if there is a desire to tighten this up in legislation, we recommend adopt
397	Other	N72	Lastly, there are a number of outstanding issues we believe should be determined before the Bill passes into law. These include: 1. The purpose of the report (including clarification of boundary iss	
398	Monitoring	N72	We agree with the intent but believe Statistics New Zealand is the expert in regard to developing datasets and suggest that their role is clarified in the amendment and where possible that Statistics New Zealan	
399	Problem, e Objectives	LU74	govt needs to be clear about the overall objective to enable the appropriate design of a national SOE monitoring programme eg difference between understanding the state of change of environmental condition compared to monitoring for effectiveness of interventions	
	Reporting	pros and cons	LU74	Pro: Using the Parliamentary Commissioner for the Environment brings a good level of independence to the process. Are some advantages at a national level to minimise duplication and ensure level of consistency in terms of monitoring and data collection services. Cons: Unclear PCE will have resources to undertake functions without undermining existing role, could be significant costs for local govt
400				
401	Monitoring	LU74	Recognise this is probably the most cost-effective option, but oppose it until a proper cost benefit analysis is completed and info provided on how costs would be offset	
	Other	G75	NZ has unique role in international circles with regards to atmospheric and oceanic monitoring and this warrants quite expensive outlay associated with regular studies if we are to stand tall in environmental stewardship	
402				
403	Problem, e Objectives	O76	All we could add is that there could usefully be some discussion around what ought to be the 'interim arrangements' while the new system is put in place, and what might be the incentives to best ensure its urgent es	
404	options	O76	Conditionally, in relation to how best to achieve high quality environmental statistics. We think it would be important for the Auditor General to have a specific direction from government to monitor and report ann	
405	options	Alternative	O76	We would be concerned about the extent to which those agencies made responsible for the proposed new monitoring and reporting requirements actually did the job and hence how they themselves would be monit
406	Reporting	timeframes	O76	Statutorily required five-yearly reporting would be a vast improvement on the current situation. However there would be operational and political benefit in the reporting period fitting with the parliamentary cycle s
407	Problem, etc	O76	In addition, a further problem is that some analyses or the conclusions drawn from them can be affected by the politics of the bodies responsible for the environment.	
408	Problem, e Objectives	O76	There is also a potential conflict of interest between Councils as regional development agencies under the Local Government Act, and their impartiality on reporting on the environment under the RMA. The other p	
409	Problem, etc	LT77	However, there needs to be an acknowledgement that local and regional authorities are managing a vast range of resource management issues affecting diverse environments. As the document identifies, the	
410	Other	LT77	An example of where stronger direction has been provided by ECan to ensure comprehensive and consistent state of the environment monitoring and reporting is undertaken relates to Chapter 12A of the Cant	
411	Monitoring	LT77	This demonstrates that there are examples of a comprehensive state of the environment monitoring regime in place entailing collaboration amongst a number of local, regional and central government agencies	
412	Monitoring	LT77	However, SDC is concerned with the lack of information contained in the discussion document around the specific monitoring roles and tasks that may be required of local authorities through any amendments t	
413	Reporting	LT77	SDC is concerned at the lack of detail of the auditing role the PCE may be tasked with, particularly with regard to any failure to comply with the regulations where there may be legitimate grounds for being unab	
414	Monitoring	LT77	However, there continues to be a high degree of doubt around the practical implications of adopting the above methods. This is highlighted in the discussion document where it states that the regulations will sp	

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7

Possible changes to national level environment reporting

Objective: to provide greater credibility

By: providing certainty of reporting, increasing independence of reporting, and improving the quality of data used

Process: August 2011 discussion document & submissions
April 2012 new Minister for the Environment... considering next steps...



1

The Government has made no policy decisions with respect to national level environment reporting.

We understand that the Government wishes to consider ways to improve the credibility of national level environment reporting in New Zealand. To achieve this we understand that they want to consider ways to provide certainty of reporting, increase independence of reporting, and improve the quality of data used.

Work progressed under the previous Minister included the release of discussion document in August 2011. Since the change of Minister in April this year the work on this policy has been on hold. We understand the new Minister will be considering background to this policy and next steps in the coming weeks.

If questions are raised on what has been considered to date...only refer back to the publicly announced items, i.e.

The National Party's 2008 Environment Policy proposed to "introduce a new Environmental Reporting Act requiring independent five-yearly State of the Environment Reports as a new function of the Parliamentary Commissioner for the Environment"

December 2011 Speech from the Throne noted the Government's commitment to introduce "new environmental reporting systems"

March 2012 National Party's environment policy paper (*Building a Bluegreen Future*) identifies the priority of developing an "Environmental Reporting Act together with a new role for the Parliamentary Commissioner for the Environment"

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8

RESOURCE MANAGERS GROUP MEETING

30 March 2012

MfE – RMG Update

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Agenda Item: Environmental Reporting Bill discussion document contact: Julie Knauf Julie.Knauf@mfe.govt.nz or (04) 439 7410

Proposed Environmental Reporting Bill discussion document: (Julie Knauf)

Previous updates

This proposed bill seeks to clarify obligations around national state of the environment reporting, including who is responsible for reporting and what these responsibilities include; and to improve the availability of high quality, consistent data to underpin national state of the environment reporting.

We have previously provided information on the discussion document for public consultation, summary of submissions and the cost-benefit analysis for this proposal. The information below focuses on the part of the proposal that seeks to amend section 360 of the RMA to enable regulations to be made that would require local government to monitor specific aspects of the environment.

Proposal to amend regulation making powers under the RMA

The discussion document identified that there could be problems obtaining high quality environmental data to underpin national state of the environment reporting. The preferred option presented in the discussion document to address this issue was to amend the regulation making powers under section 360 of the RMA to require local authorities to monitor the same aspects of the environment according to specified methodologies and monitoring sites.

A number of submissions raised concerns in response to this proposal. The primary concern is these regulations could potentially impose significant costs on local government, especially if Councils would be required to monitor additional sites to those already monitored for regional purposes. There were strong views central government should cover any additional cost and this cost should not be picked up by rate payers.

Additionally, this environmental reporting policy proposal has been under development for some time, during which the status quo has evolved. Non-statutory initiatives like NEMAR¹ have been initiated by the Ministry since this policy was originally proposed. This initiative is likely improve the availability of high quality environmental statistics without the need for regulation.

¹ National Environmental Monitoring and Reporting project which aims to (1) ensure that monitoring by Councils and CRIs is consistent, high quality and appropriately distributed and (2) develop composite indicators for reporting river and lake water quality and air quality.

Local government, in particular regional and unitary councils, are also undertaking initiatives to improve the consistency and availability of environmental data. These initiatives are led by the Local Authority Environmental Management Group (LAMEG) and include developing national environmental monitoring standards, training and quality assurance systems. This programme was initiated to ensure national reporting on environmental health is underpinned by nationally consistent and quality assured data.² Regional councils are also seeking to improve data availability to the public through the development of the Land and Water New Zealand website (www.landandwater.co.nz).

Furthermore, as part of its leadership role in strengthening the Official Statistics System, Statistics NZ is leading the development of an environment domain plan. This plan seeks to address gaps, overlaps, and deficiencies in environmental data in New Zealand and prioritise initiatives to address the gaps and issues. The Environment Domain Plan is an alternative intervention that could provide impetus for improvements in the quality and availability of data for national state of the environment reporting.

There is a strong preference for a whole-of-system approach to addressing issues around data quality and consistency. This recognises that data suitable to underpin national state of the environment reporting is collected by a range of organisations, including, the Department of Conservation, Ministry of Agriculture and Forestry, Crown Research Institutes (e.g. NIWA and GNS), and local government.

Next steps

We are continuing to work towards a report back to Cabinet in June 2012. This report back will seek policy approval to proceed with drafting legislation. Any legislation will need to go through the standard legislative process where it is scrutinised by a Select Committee. There will be a further opportunity for submissions on the proposal at this stage.

We appreciate the input we have received from the RMG members nominated to work with us on this proposal. We intend to continue working with this group as we progress the policy development.

² The National Environmental Monitoring Standards project aims to ensure that continuously monitored data is collected using consistent and high quality protocols. To date, standards have been completed for rainfall monitoring, quality coding of data and water safety in and around rivers. Work has commenced to develop standards on a range of aspects of water quality including turbidity and total suspended solids, dissolved oxygen and water temperature.

