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**Topics for environmental reporting**

Thank you for the opportunity to submit on the Discussion Document - Topics for Environmental Reporting. This response is prepared on behalf of local authorities.

LGNZ’s submission to the Environmental Reporting Bill made the point that current local government monitoring frameworks are developed to inform at a local or regional level, not national and that this is entirely consistent with the statutory roles, responsibilities and functions of local authorities. This is prescribed by section 35 of the Resource Management Act.

While the Environmental Reporting Bill provides a focus on national reporting, councils will continue to have their own obligations under section 35 of the Resource Management Act 1991 for regional state of the environment monitoring and reporting. Data from regional councils is already one of the most important sources available for national environmental reporting and will continue to provide information to fulfil reporting requirements for some domains and many topics.

As such, regional councils are key stakeholders in environmental monitoring and reporting, regionally and nationally, and have been working collaboratively with the Ministry for the Environment to help promote consistency, and improvements in data collection and quality coding standards. This enables the aggregation of data at a national level. Consequently, we strongly support continued engagement and collaboration to ensure that data streams and processes meet both central and local government needs.

Regional councils actively collaborate with the Ministry for the Environment (MfE) to develop and deliver national environmental indicators. This relationship is formalised with a joint LGNZ Regional Sector /MfE project which involves the regional sector developing and operating integrated regional/national environmental data collection networks.

We encourage Central Government to collaborate and partner with local government - to work together on information requirements (content, standards, methods, timing). In relation to the accounting requirements associated with the National Policy Statement and the National Objectives Framework we encourage alignment across the environmental reporting space.

This is specifically relevant in relation to new requirements for accounting for freshwater takes and contaminant loads. Alignment between freshwater accounting (under the National Objectives Framework) and reporting requirements for the “freshwater domain” under this legislation is critical.

While the Bill explicitly states in its explanatory statement that reporting will be based on the best available data and does not include any requirement to generate information that is not currently collected, the reporting will inevitably show where there are significant gaps in existing data collection. Therefore, reports using currently “best available data” are unlikely to meet the Bill’s goal of giving New Zealanders “the information they need to understand the condition of their environment, why it is like that, and what that means.”

For almost two decades regional councils have actively collaborated with the Ministry for the Environment (MfE) to develop and deliver national environmental indicators. This relationship is currently being formalised with a joint Regional Sector Group/MfE project which involves the regional sector developing and operating integrated regional/national environmental data collection networks. The data will be delivered via widely accessible database(s) and reporting platform(s). One of the matters to be worked through as part of this joint project is the apportionment of costs – there will be additional costs to local authorities having a role in national environmental reporting.

Overall, there is a willingness to collaborate and partner with the Ministry in this area - to work together on information requirements (content, standards, methods, timing). A paper is currently being jointly prepared by Ministry officials and regional sector representatives, setting out governance arrangements and operational details of this project.

Our recent submission to the Ministry for the Environment on the proposed amendments to the National Policy Statement for Freshwater Management 20112 traversed the need for integration across the environmental reporting space. This is specifically relevant in relation to new requirements for accounting for freshwater takes and contaminant loads. Alignment between freshwater accounting (under the National Objectives Framework) and reporting requirements for the “freshwater domain” under this legislation is critical.

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Regional councils collectively spend some $30 million dollars collectively on environmental monitoring and reporting. Given this role in environmental monitoring and reporting, it is important to foster this partnership for two reasons. As outlined above, regional councils are critical in providing some of the data/information needed for national environmental reporting; and secondly, any

**General comments**

The Objectives in Appendix 2 are well written and provide clear and strategic direction.

Until such time as the Government Statistician confirms which statistics, methods and procedures will be used to measure each topic we are unable to make an informed comment about what might be missing or changed.

**Alignment with international frameworks is encouraged**

International frameworks (e.g. OECD, EEA) define Impacts in state of environment reporting as *environmental effects of pressures on the natural state*. MfE is using the definition: ‘an impact describes changes in the uses or benefits to society by a change in environmental state’[[1]](#footnote-1). Significant areas for reporting on Impacts may be missing because MfE’s definition is narrower (it focusses Impacts on to the socio-economic or socio-cultural costs and/or benefits from an altered environmental state). We suggest you seek alignment with international frameworks.

**Roles and responsibilities of agencies**

For topic measures that will use local authority data, consultation with the relevant local government sector (i.e. regional or territorial sector) about parameters for each measure is necessary, before regulations are made. This is important given that under the Objectives of the Environmental Reporting Regulations, the topics signal future direction for the scope of environmental reporting long term, and drive data improvement

It is unclear from the table of proposed topics for domains, and from MfE’s reporting to date whether there is a role for territorial authorities. MfE’s reporting to date uses local authority data from regional/unitary councils (e.g. from the regional sector for air, freshwater, land, and marine domains).

It is conceivable, given the proposed topics, that a topic could be regulated which requires territorial authority (city and/ or district council) data. For example, territorial authorities probably have the most comprehensive data on community drinking water supplies, and waste to landfill. Such data could be relevant given the proposed topics for ‘management, resource use and other activities, and ‘waste, litter and other human activities’ under the freshwater and land domains.

For reporting on topics, it will be important to make clear the roles and responsibilities of agencies involved in the national environmental information system[[2]](#footnote-2). For local government, this includes being clear about the respective roles of each type of local authority: regional, unitary, city, and district councils, in data collection, analysis and interpretation.

**Specific comments**

**Biodiversity and natural capital**

In relation to biodiversity, the topics proposed for domains are supported. The topics are broad enough to encompass most of the statistics or measures that will be relevant to biodiversity reporting.

However, two terms are absent from the framework and we find this surprising: “natural capital” and “ecosystem services”. These are important, commonly understood, ecological concepts and the current topics need to capture them adequately.

There is one proposed topic (across all domains) labelled “Impacts on biodiversity and ecosystem processes.” Biodiversity is one component of natural capital but there are also a number of other important components. See the Treasury explanation at: <http://www.treasury.govt.nz/publications/research-policy/tp/higherlivingstandards/16.htm>

Environmental reporting in a country like New Zealand that depends so heavily on its natural resources, should specifically address the concepts of natural capital and ecosystem services.

This would align with Treasury’s desire to expand the use of its Living Standards Framework <http://www.treasury.govt.nz/publications/research-policy/wp/2015/15-12>

**Amendments are sought to some text**

*Impacts on biodiversity and ecosystem process*es

The example given in the 3rd bullet is a state rather than an impact. An example of an impact would be, “the reduction in the extent of wetland habitat affects species abundance/biodiversity.”

*Table 2*

Proposed topics for all domains, amend as follows: ~~Economic~~ impact on the economics of natural resource value, availability and use.  The ~~economic~~ impact the state of the environment has on natural resource economic value, availability and use, for example…

*Topic - Marine (Stat*e)

Amend as follows: Marine water quality ~~and ocean acidity~~ – acidity is a component of water quality

*Topic - Marine (State)*

Amend as follows*:* Sea level, ~~temperature~~ and circulation – temperature is a component of water quality (which is a separate state)

**Clarification is sought on matters**

*Pressure Topics*

In relation to waste, litter and other human activities:  it is unclear what the demarcation is between what would be covered by this topic and the pressure “Management and resource use”.  The examples given tend to support changing the pressure topics to “Abstraction and use” and “Discharges and development”.

*Freshwater Topic*

In relation to “Pressure from physical form of the land and freshwater environment” it is unclear what this is referring to.

*Freshwater Topic*

In relation to “State of mineral and energy resources” it is unclear what this is s referring to. Geothermal waters are an energy resource and hydro energy is more of a potential energy and therefore could be better assessed under Impacts (natural resource value ad availability). Some waters could provide minerals, such as boric acid, but this is fairly rare in New Zealand.

*Land topic*

In relation to “land species”, how will species and states be considered that cross over more than one state, i.e., some fish are both fresh and marine, birds likewise cross habitats.

Related to this, it is unclear how estuaries will be reported on.

**Consultation with local authorities**

As the reporting process moves forward, Technical Advisory Groups on various matters, including biodiversity, comprising experts, should be established to assist MfE and Statistics NZ. Local authorities should be part of this, where they have a role in the provision of data.

Specific to biodiversity, producing a comprehensive, high quality environmental report on biodiversity will be difficult and is made more complex by the need to draw information from multiple domains that often won’t have biodiversity as their primary interest. A Biodiversity TAG would be useful in that process and also to help identify suitable measures or statistics. Members from local government should be part of this TAG.

Yours sincerely

etc

1. Ministry for the Environment, 2014 [↑](#footnote-ref-1)
2. A framework for Environmental Reporting in New Zealand. Ministry for the Environment. 2014; page 7, Figure 2 [↑](#footnote-ref-2)