



Ministry for the
Environment
Manatū Mō Te Taiao

Measuring Up: Environmental Reporting

Summary of Submissions

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1 Introduction

This report summarises the submissions received on “Measuring up: Environmental Reporting – A Discussion Document” (the Document). This summary report (the Report) has been structured as follows:

- overview of the submissions received
- problems, objectives and criteria (questions 1-5)
- options (questions 6-10)
 - the reporting option (questions 11-13)
 - the monitoring option (questions 14-15)
- costs and benefits (questions 16-18)
- other comments.

Each section of this Report summarises the responses to the Document questions. General information is provided at the end of this Report on other key points raised. This Report does not include every individual point raised in response to the Document. Instead key themes are discussed. Additionally, this Report does not provide a response to issues raised in the submissions.

Most submitters did not answer every question and in some instances it was not clear which question people were addressing. Consequently a different analysis team might come up with slightly different results. However, we are confident that the key messages have been reflected.

2 Overview of the submissions

A total of 76 submissions were received in response to the Document. Figure 1 provides an overview of the various submitter groups and the number of submissions received from each of these groups. Figure 2 illustrates the region submitters were from.

Points to note in these figures are:

- submissions were received from all except two regional and unitary councils
- there was strong interest from the research sector, which included universities, crown research institutes and consultants
- there was significant interest from professional bodies and associations
- the “other” category is dominated by submissions from the business sector
- submissions were received from almost every region of New Zealand.

Figure 1: Types of submitters

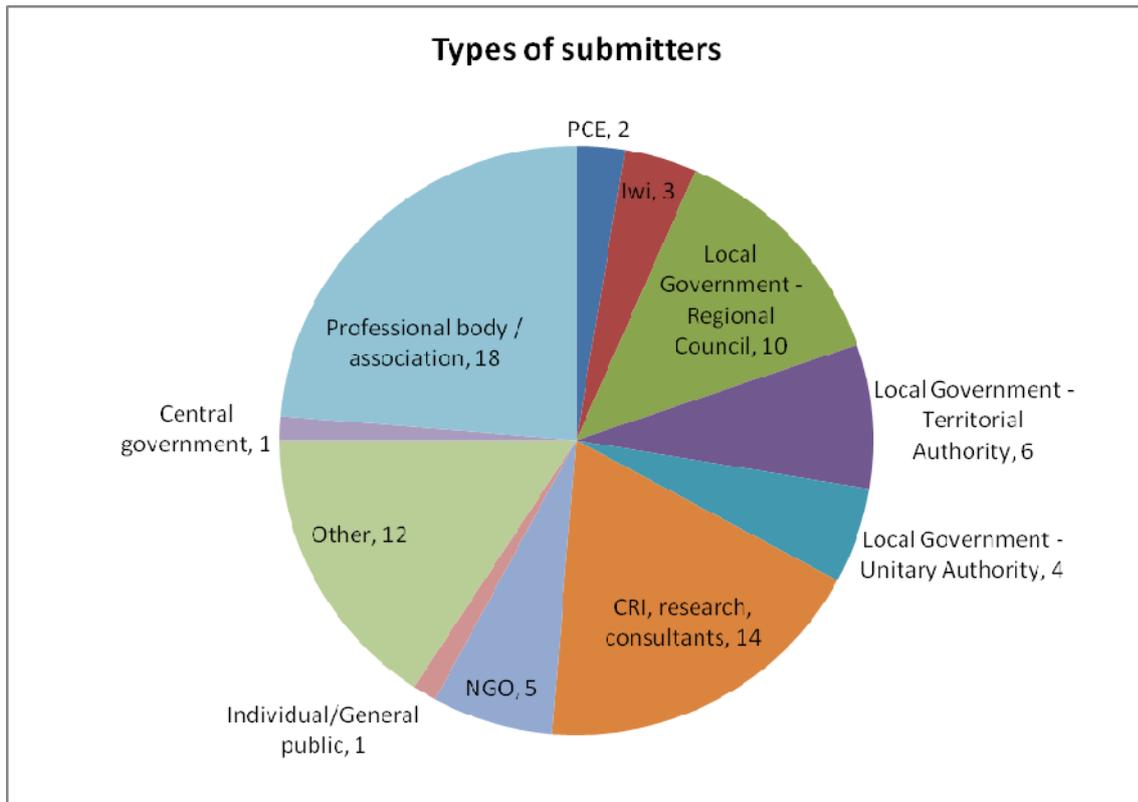
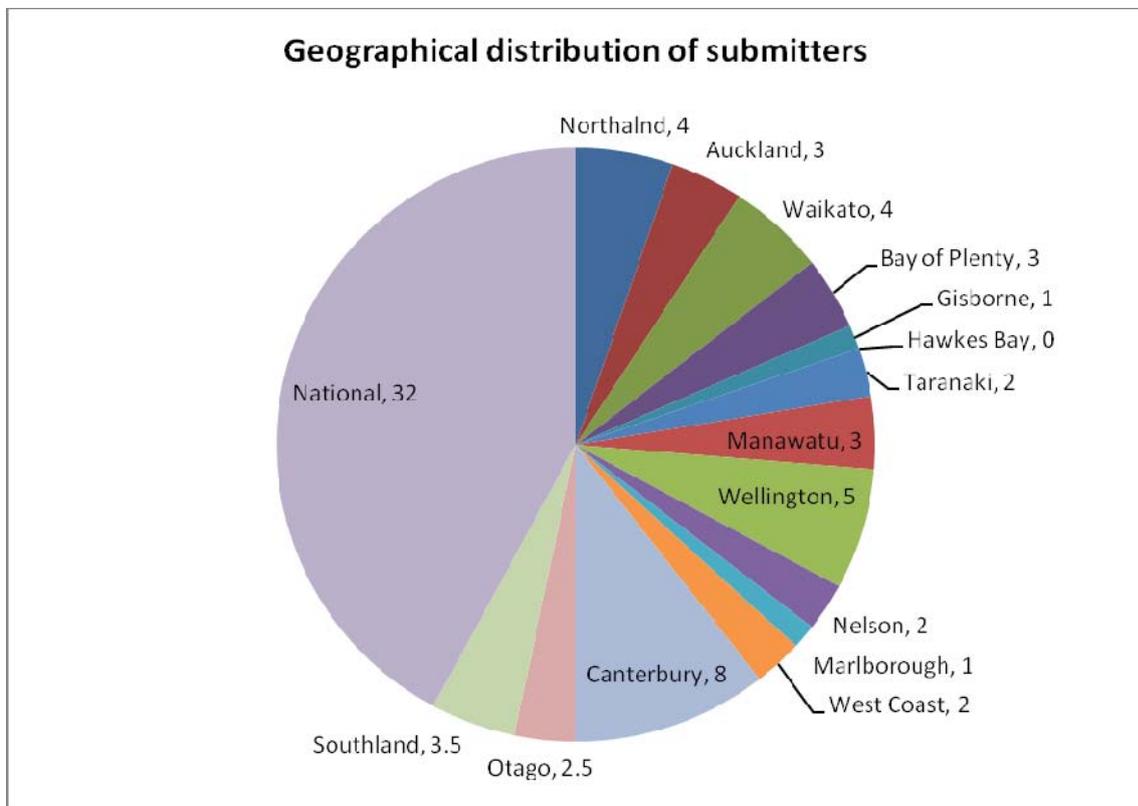


Figure 2: Geographical distribution of submitters



There was general support for government action in the environmental reporting space, in particular the need for more accountable and robust monitoring and reporting on the state of the environment. Although people supported action in this area, they did not always support the preferred options that were identified in the Document. There was overwhelming support for the government to take action in the environmental reporting space with 75 of the 76 submitters indicating support for change (it was difficult to tell the view of 1 submitter).

A number of submitters commented that the Document was high level and did not contain sufficient detail to enable comment on the details of the proposal or implications of the preferred options. Many submitters requested ongoing engagement to provide them with the opportunity to comment and help shape the proposal in more detail.

3 Problems, objectives and criteria

The Document proposed two key issues.

Issue 1: There is a lack of statutory obligation in New Zealand requiring regular and independent state of the environment reporting.

Issue 2: Inconsistent regional state of the environment monitoring programmes.

The Document proposed that to address these two issues, any preferred options should achieve the following objectives:

- it is clear who is responsible for regular state of the environment reporting
- the role of state of the environment reporting is independent of Government
- high quality environmental statistics are available to underpin state of the environment reporting and environmental policy-making.

A set of assessment criteria was proposed to assess the suitability of each of the options identified (see page 15 of the Document):

- regular and independent reporting on the state of the environment
 - A. provide certainty for state of the environment reporting
 - B. dispel perceptions of lack of independence
 - C. be a natural fit with legislated responsibilities.
- high quality, consistent statistics are available to report and underpin policies on the environment and the economy
 - D. achieve high quality, consistent environmental monitoring
 - E. be cost efficient.

Question 1: Do you agree with the issues identified above? Have the main issues been defined accurately?

In general submitters agreed with the issues that had been identified and that the main issues were defined accurately.

A theme that came through strongly in the submissions was that variation in regional state of the environment monitoring programmes is entirely appropriate and should be recognised and provided for. Different regions face different environmental challenges. Therefore monitoring is not uniform across New Zealand.

There were a number of other comments in response to this question. The general themes are described below.

- A number of submitters sought clarification that the focus is **national** state of the environment reporting.

The Ministry for the Environment (the Ministry) confirms that the focus of this proposal is national state of the environment reporting.

- The Document has focused on independent reporting when the issue is both **regular** and **independent** reporting. It was suggested irregular reporting could be identified as an additional stand-alone issue.
- The issues are too narrowly focused on regional environmental monitoring, including inconsistencies in data collection, analysis and presentation methods. Other agencies, including territorial authorities, crown research institutes and resource consent holders, also monitor the environment and should be included in the proposal.
- A couple of submitters were not convinced that a lack of statutory obligation to produce a state of the environment report was the issue. It was felt funding and resourcing was more likely the bigger issue that is limiting the production of these reports and could continue to do so in the future.
- The need for high quality statistics was emphasised by some submitters.

Question 2: Are there any other issues that have not been considered?

A number of submitters suggested issues that had not been considered. Suggestions included the following issues.

- Territorial authorities also collect data that could be of interest, for example they collect information on waste going to landfill.
- Environmental reporting should enable international comparisons with trading partners and competitors, thus enabling New Zealand to validate our clean green image.
- Quality assurance will be an important issue, along with aligning with international best practice. The need for auditing was raised by some submitters.
- The issue of capability to both monitor and report was raised.

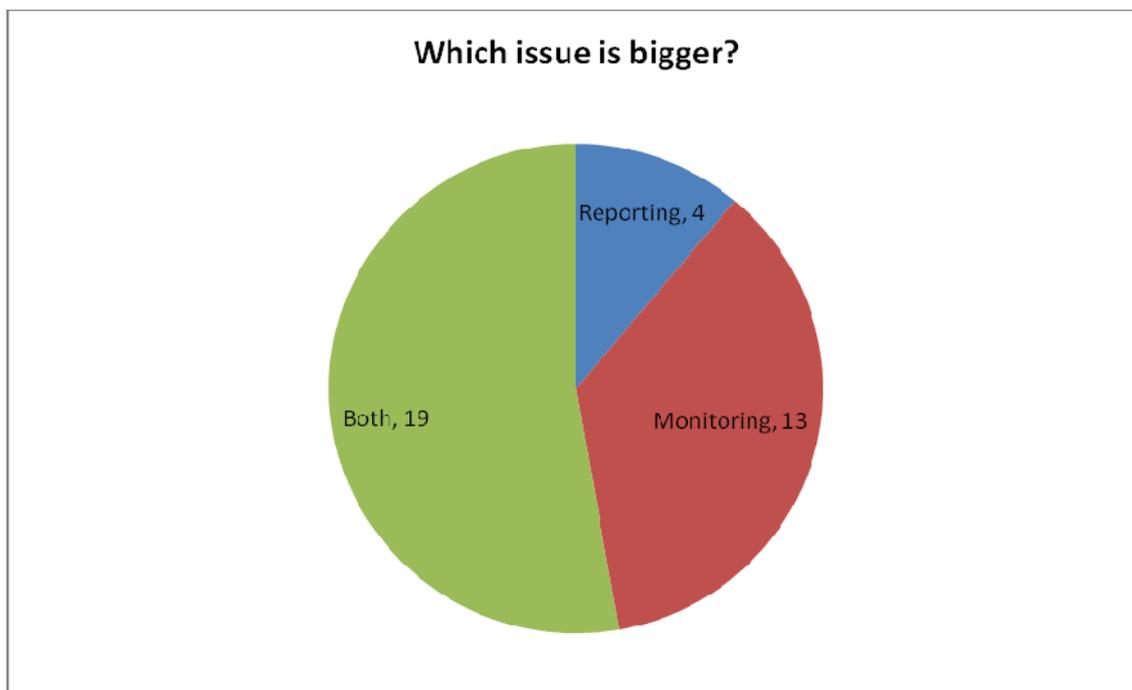
Question 3: What is the scale of the problem? Which is the bigger issue: the lack of statutory obligation requiring regular independent state of the environment reporting or inconsistent state of the environment monitoring?

Very few submitters commented on the scale of the problem. An example of responses to this question include “the scale of the problem is huge” and “the problem is regional and nation wide in scope”.

The second part of the question asked which issue is bigger. The answer to this question was clearly stated in 36 of the 76 submissions. As illustrated in Figure 3, the most common response was both issues are equally important (53 per cent of responses). Only 11 per cent of responses identified reporting as the bigger issue.

Where submitters selected either monitoring or reporting as the bigger issue (ie, they did not answer “both”), they often included a comment that the other option was also important.

Figure 3: Which issue is bigger – regular independent reporting or inconsistent monitoring?



Question 4: Do you agree with these objectives? Please give reasons.

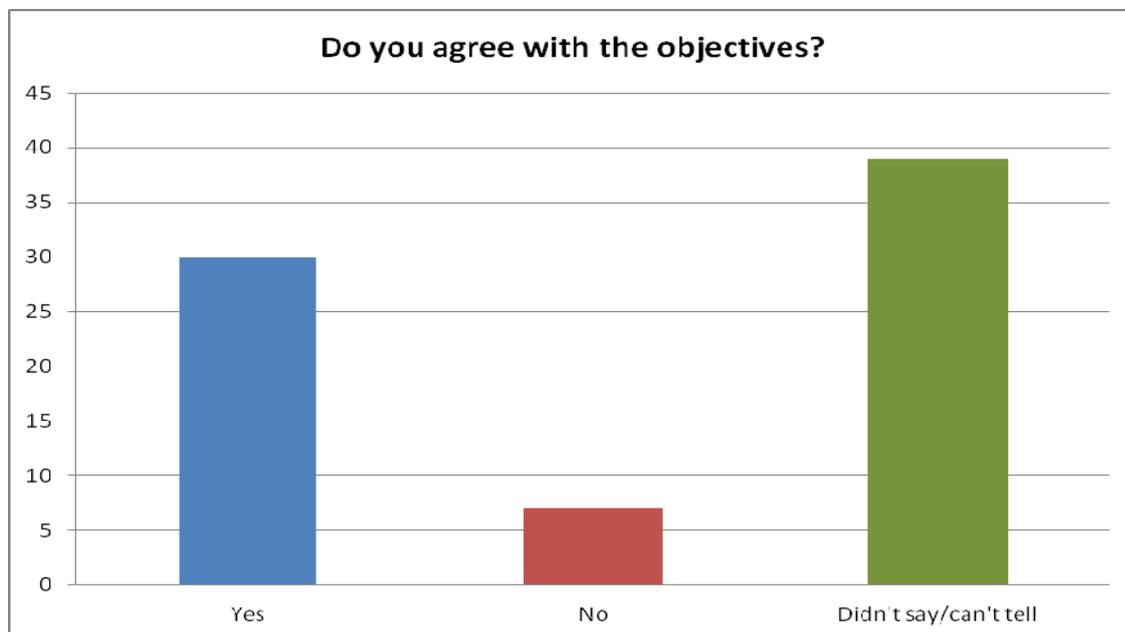
The answer to this question was clearly stated in 37 of the 76 submissions. As illustrated in Figure 4, 30 of these 37 responses agreed with the objectives proposed in the Document.

Specific comments included the following.

- The objectives need to be clear that this proposal is about national state of the environment monitoring and reporting.

- The purpose of state of the environment monitoring and reporting needs to be clearer. It could include international reporting commitments, informing the effects of environmental policy or management, informing and revealing long-term patterns of environmental change. The purpose needs to include the current situation and implications of this. Additionally, understanding the purpose is important because data that provides information on the state of the environment can be different to the data that tells us about the drivers and causes of problems and the data that tells us about the impact policy interventions might be having.
- One objective should be to make better use of the data that is available from a wide range of organisations. This data is expensive to collect but inefficiently used.
- The need for high quality data and statistics was emphasised. The information needs to be high quality, fit for purpose and meaningful. The preparation of a high quality and credible state of the environment report was also identified as important.
- There were differing views over the need for independent state of the environment reporting. Some submitters thought the report being produced independently was important, while some thought it would not be a problem for the Ministry for the Environment (the Ministry) or another government department to produce the report. Government departments are responsible for producing state of the environment reports in some overseas countries. Additionally, a perceived lack of independence could be addressed through making the process more transparent.
- It is not clear who the intended audience is for the state of the environment report, or what they will use the report for. This should be clarified.

Figure 4: Agreement with the proposed objectives



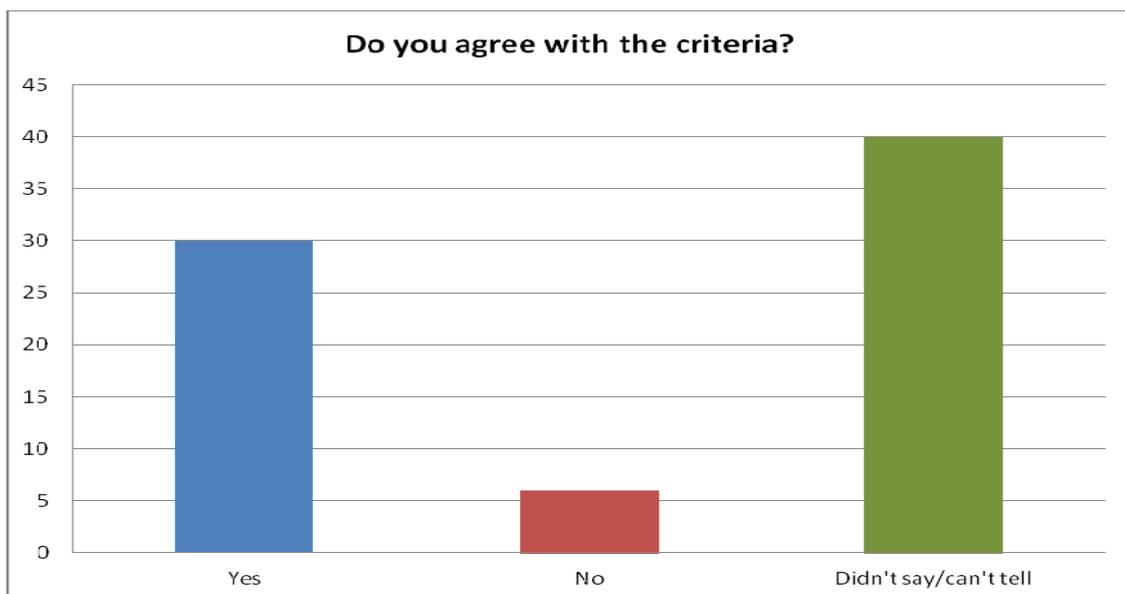
Question 5: Do you agree with the assessment criteria? Please give reasons.

The answer to this question was clearly stated in 36 of the 76 submissions. As illustrated in Figure 5, 30 of these 36 responses agreed with the criteria proposed in the Document.

Specific comments included the following.

- The criteria should be prioritised or weighted. Some submitters felt the need for independence should be given a lower weight and could be addressed in other ways such as through the use of more robust and transparent methodologies.
- A criterion should be to meet international monitoring standards.
- Criterion E should be extended to change the focus from regional to national environmental monitoring. The methods for collecting data should also be cost efficient. Additionally, cost efficiency should also include the administration and compliance costs associated with implementing an option. However, the need to achieve cost efficiency should not limit the indicators monitored.
- There should be a criterion around confidence in the consistency and independence of the report and process. It is important the state of the environment report is trustworthy and free from perceived bias. This could be achieved through audits of the data collection systems and processes.
- The criteria need to recognise the need for integrated reporting where the focus is strategic need, future focus, connectivity of information, conciseness, reliability and materiality.
- The capability of organisations to carry out their roles should be a criterion.
- Some felt the criteria were more like objectives or principles.

Figure 5: Agreement with the proposed criteria



4 The options

Two sets of options were proposed in the Document. The options to achieve regular and independent environmental reporting were:

- retain the status quo
- amend the Environment Act to require the Ministry to produce a state of the environment report every 5 years
- amend the Environment Act to require the Parliamentary Commissioner for the Environment (the PCE) to produce a state of the environment report every 5 years
- amend the Environmental Protection Authority Act to require the Environmental Protection Authority (the EPA) to produce a state of the environment report every 5 years
- amend the Statistics Act to require the Statistics New Zealand to produce a state of the environment report every 5 years.

The options to achieve high quality environmental statistics were:

- retain the status quo
- use provisions under the Statistics Act
- amend regulation-making powers under the RMA
- amend the Environment Act.

The preferred options proposed in the Document were:

1. give the PCE an explicit role under the Environment Act 1986 by requiring five-yearly reports on the state of the environment
2. expand regulation-making powers under section 360 of the RMA to improve the consistency of state of the environment monitoring statistics at the local level. This could be supported by the application of the Official Statistics System principles and protocols, particularly in the area of quality and related standards.

Question 6: Do you agree with the preferred options? Please give reasons.

Submitters answered this question in a variety of ways. Some clearly stated they agreed with both preferred options while others agreed with one proposed option but not the other. Figures 6 and 7 illustrate submitters agreement to preferred options.

Option 1: Reporting

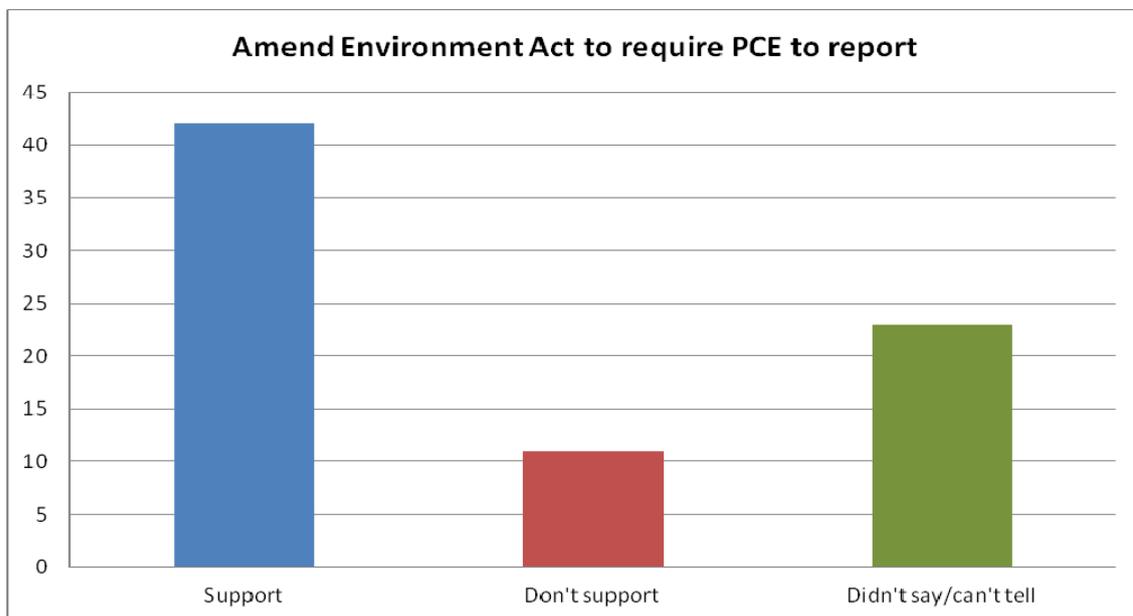
There was strong support for the legislation to be amended to require PCE to prepare a state of the environment report every 5 years. However, a number of issues were also raised including the following.

- The function of environmental reporting is consistent with PCE's role as an environmental auditor and overseer. This would also be consistent with the PCE's role of undertaking and encouraging the collection and dissemination of information relating to the environment.

- This option would meet the independence test. Some submitters were concerned that the PCE is not neutral and is biased towards environmental protection.
- 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 resourcing required for this task could be significant and should not be underestimated.
- The capability and capacity for PCE to take on this reporting role would have to be built from scratch within the organisation. These skills already exist in other organisations.
- The division of responsibility between the Ministry and PCE was not clear to submitters. For example, how will the PCE advise the Ministry of the indicator data required? There was also concern about potential conflicts where the types of data requested by PCE are not supported by the regulations made by the Ministry.

A number of submitters (7 submitters or 9 per cent 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.

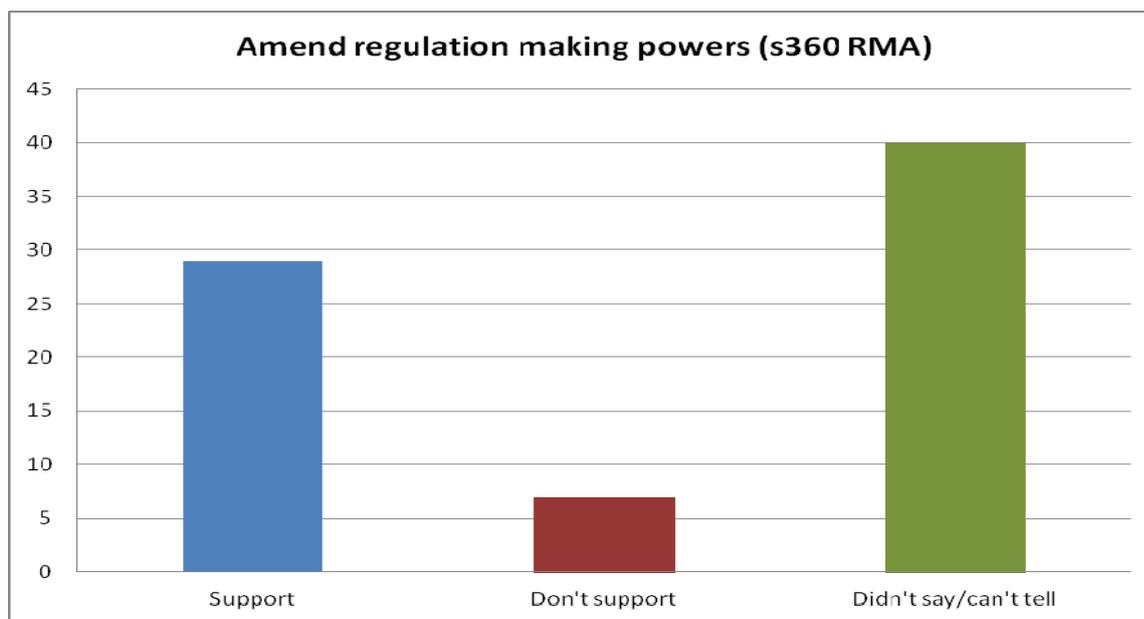
Figure 6: Agreement with the preferred option to amend the Environment Act to require PCE to prepare a state of the environment report



Option 2: Monitoring

A number of submitters provided detailed comments on the proposed amendment to section 360 of the RMA. These comments are discussed in detail under question 14.

Figure 7: Agreement with the preferred option to extend the regulation making powers in section 360 of the Resource Management Act 1991



Question 7: Is there an alternative option that has not been considered?

Submitters suggested a number of alternative options that they felt had not been considered. These include the following.

- Statistics NZ undertakes the reporting role as discussed above in Question 6.
- The Ministry for the Environment should continue to prepare the state of the environment report.
- An appropriately experienced team within a Crown Research Institute or university be responsible for preparing the state of the environment report. Alternatively a new organisation could be created. For example there could be a national environmental monitoring and reporting agency that sits within an existing organisation like PCE.
- Regional councils could deliver the national state of the environment report and the PCE could audit this report.
- The EPA could provide oversight and support to councils to assist with their monitoring role. PCE could prepare the national state of the environment report.
- The existing option to develop national environmental standards and national policy statements could be used instead of changing section 360 of the RMA to allow new regulations to be created.

- The process could be designed to be similar to Statistics NZ National Environmental Accounts.
- The suggestion to have an advisory committee should be implemented alongside the legislative change to require PCE to prepare the state of the environment reports. The advisory committee option has been successful in Australia.
- Any legislation amendments should take a whole system approach which recognises that more agencies than just regional councils are responsible for collecting environmental data. Additionally, data is also collected under other Acts.
- The legislative amendments should be made as a standalone Act. This would give this activity a higher profile.

Question 8: To what extent do the options address the identified problems?

Not many submitters answered this question. The responses provided included a mixture of views including both agreeing that the options address the problems to considering the options will not address the problems. Some submitters felt that having a legislative requirement would not make any difference or achieve the objectives.

Question 9: Are you aware of any other costs and benefits of the options?

In answering this question submitters tended to identify aspects that needed to be included in the cost benefit analysis rather than provide information on the actual costs and benefits. This is perhaps because some submitters felt more cost benefit information was required to enable them to comment properly.

It was suggested the cost benefit analysis needed to include the following.

- The significant benefits of having consistent national environmental monitoring, including having data to support the identification of environmental issues and designing interventions.
- The cost of designing a national monitoring and reporting system.
- The cost of transferring reporting from the Ministry to PCE (it was suggested these could be significant).
- What it will cost PCE to produce these reports, including how to maintain the resource (staff numbers) in years when a report is not being produced (it was suggested this could be addressed by making use of secondments within and outside government).
- The one-off cost associated with defining the indicators and the ongoing monitoring costs.
- The magnitude of cost increase for local authorities. This will depend on the extent to which existing monitoring programmes need to change. This should include the resourcing and cost to collect the data, including the cost to councils to monitor for both regional and national priorities. Further information is also required on how local authorities are expected to fund the collection of data for national reporting purposes (it was felt this cost should not be passed onto ratepayers or consent holders).

- The cost to integrate existing datasets where new or additional monitoring is different to current practice.
- The cost of misreporting and the resulting problems.
- The benefits to industry.
- Further information (not just cost information) on the benefits of national state of the environment reporting.

Question 10: Do you have any comment about which option would deliver the highest level of net benefit?

Not many submitters answered this question and there was little agreement amongst the answers. It was suggested the following options would deliver the highest net benefit (note most of these comments represent the views of one or two submitters):

- require PCE to produce 5 yearly state of the environment reports (four submitters)
- require PCE to produce 5 yearly state of the environment reports along with using the existing national environmental standard mechanism
- amending section 360 of the RMA and producing regulations for monitoring
- the proposed option of requiring PCE to report and amending section 360 of the RMA
- requiring MfE to produce the state of the environment report
- requiring the Government Statistician (Statistics NZ) to produce the state of the environment report
- requiring regular auditing
- setting up a standalone agency to produce the state of the environment report.

4.1 The reporting option

Question 11: What are the pros and cons of the proposed Environment Act amendment?

The following ‘pros’ were identified.

- PCE would bring a good level of independence to the process.
- This option would minimise duplication at the national level and ensure consistency in terms of monitoring and data collection (note there is an opposing view below).
- The legislation will help ensure regular and consistent reporting happens, and will also assist with delivering high quality and consistent environmental data.
- Regular reporting will provide the evidential basis for New Zealand to validate its environmental credentials. It could also help meet international reporting requirements.

- Depending on what indicators are selected, regular reporting could allow the identification of national environmental trends and emerging issues, and therefore support national environmental policy making.

The following 'cons' were identified.

- PCE will require appropriate resourcing to ensure the existing functions are not undermined.
- There is limited evidence to suggest reports by PCE have been seriously responded to by governments in the past.
- The cost to local government could be significant.
- Investment will be required to ensure robust criteria are developed, and that these criteria result in the development of suitable indicators and monitoring networks.
- There is potential for duplication of work done by PCE and the Ministry. Additionally, more staff may be needed overall. There could also be duplication of effort by having separate agencies collecting and collating environmental statistics. This could give rise to duplication in activities and conflicting information. This risk is high if PCE is operating outside the official statistics system.
- Locating the reporting activity within the office of the PCE and the statistics gathering activities within the Ministry could lead to fragmentation of activity and a lowering of critical staffing levels within the Ministry. This could have an adverse impact on the Ministry's role under the Environment Act 'in formulating advice to the Government on environmental policies'.
- The regional monitoring requirements might not match the national requirements.
- PCE has no regulatory capacity to generate data that will be required. Additionally, PCE could be constrained to report on the selected data that has been supplied. Therefore PCE needs to be involved in designing the monitoring programme.
- PCE is likely to be pressured by different sectors of the population to report on particular issues.

The following 'other' comments were made in response to this question.

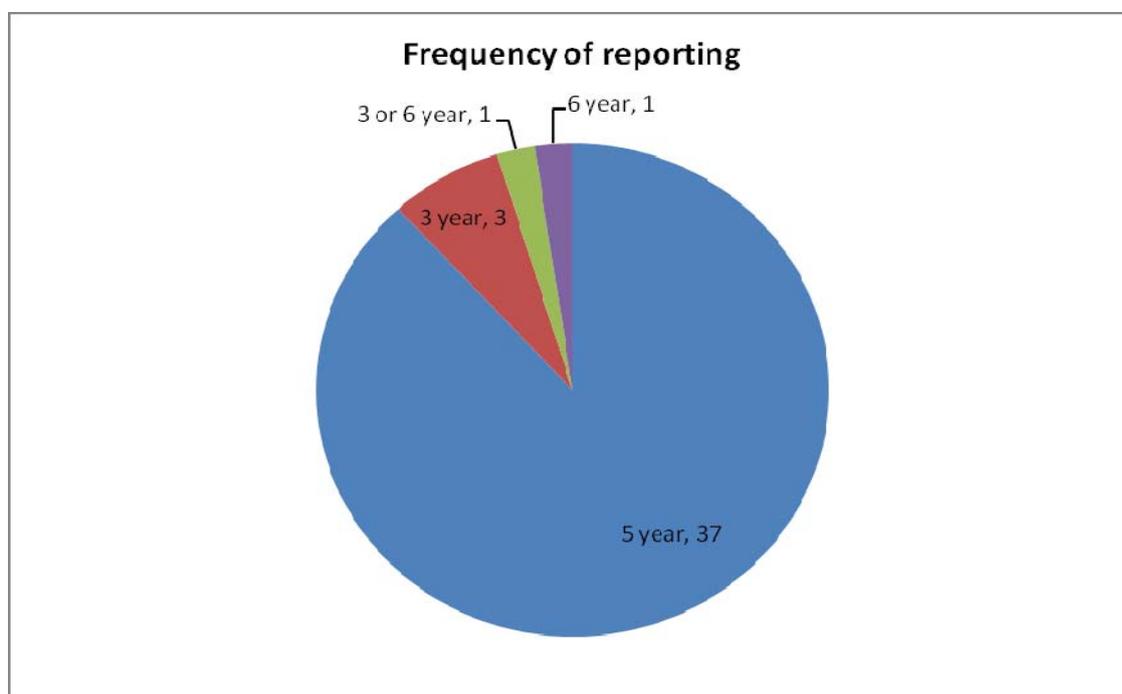
- There should be explicit direction that the state of the environment report is to be impartial and based on sound science.
- It might take several years to establish smooth, efficient systems and processes.

Question 12: Is five-yearly reporting an appropriate reporting timeframe? If not, what time period would you recommend?

As illustrated in Figure 8, the general consensus was 5 yearly reporting is appropriate. Other suggestions were 3 and/or 6 year reporting timeframes that would be linked to the election cycle and could be used to hold the government to account. There were also suggestions that the reporting frequency could be linked to local government reporting processes, such as the Long Term Plan.

A number of submitters agreed that 5 yearly state of the environment reporting was appropriate, but suggested more frequent shorter reports might be required for some issues to enable quick identification of those issues. For example, there could be annual reports on ‘hot topic’ issues.

Figure 8: Appropriate reporting timeframe



Question 13: What do you think about the proposed environmental domains that the Parliamentary Commissioner for the Environment should report on in the state of the environment report? What topic areas or requirements (if any) would you suggest?

There was general support for the proposed environmental reporting domains, although there were also some comments that the proposed list of domains was too narrow. One alternative suggestion was the list of 13 domains used by the OECD.

There was also a comment that we need to define what is meant by “environment” and if it is limited to the biophysical environment. Alternatively, “environment” could be defined around what is significant to the New Zealand brand.

Some submitters provided a large amount of detail on what should be measured within a domain, particularly within the biodiversity, oceans/coastal, land use and water domains. Additionally, there were suggestions that the PCE should decide the domains, along with alternative suggestions that it is not the role of PCE to decide the domains.

The need to avoid continually changing the domains and variables measured was also noted. This is important to ensure long term trends can be identified.

Some submitters felt it is important to identify the reporting framework to be used. For example will the PCE use a pressure-state-response framework, DPSIR (Driving Forces-Pressures-State-Impacts-Responses) framework, or a driving-force-pressure-state-impact-response framework?

The domains suggested include the following.

- Water
 - Water quality
 - Surface water
 - Groundwater
 - Water resources
 - Point source discharge
- Oceans/coastal
 - Estuarine
 - Territorial sea
 - Exclusive economic zone
 - Coasts
 - Continental shelf
 - Land-sea interface
 - Point source discharge
- Land use
 - Conservation
 - Rural
 - Urban
 - Erosion
 - Crops
 - Livestock
 - Forestry
- Biodiversity
 - Exotic biodiversity
 - Biosecurity
- Ecosystem services
 - Lowland ecosystems
- Fisheries
- Air
- Atmosphere
 - Climate change
 - UV radiation
- Waste
 - Cost of landfill
- Built environment
- Social and cultural components
 - People and communities
- Maori issues
- Luminal zones
 - Wetlands
 - Coasts
- Transition environments
 - Coasts
 - Estuaries
 - Wetlands
 - Aquifers
 - Geothermal systems
 - Glaciers
 - Atmospheric conditions
- Energy
- Land-based sources of marine pollution
- Mineral production
- Soils
- Natural hazards
- Wilding conifers
- Relationships between domains

4.2 The monitoring option

Question 14: Outline any problems you perceive with the proposed RMA amendment?

A number of submitters commented on problems they perceive with the proposed amendment to section 360 of the RMA. These comments included the following.

- It is not clear in the Document who will bear the cost of collecting data for national environmental reporting. A number of submitters suggested councils will need additional resources if they are to undertake monitoring for national state of the environment reporting. This requirement for additional resourcing is particularly important for regional councils with limited capacity. Additionally, a number of submitters suggested this cost should not be passed onto ratepayers and that central government should pay, like they already pay crown research institutes to collect data.
- A number of submitters suggested the existing regional monitoring frameworks may not be suitable for national purposes. Significant effort is put into establishing regional monitoring programmes that meet the needs of the region. This regional monitoring might need to be changed to meet national reporting requirements. It is important that local issues continue to be monitored and reported on. It was felt more detail is required on what is proposed, including how the data collection will be funded and what any changes might mean for the existing regional monitoring programmes.
- A number of submitters pointed out that regional councils are not the only group that collects environmental data that will be important for national state of the environment reporting. Additionally, data is also collected under other Acts including the Local Government Act, Land Transport Management Act and Biosecurity Act. Therefore it was suggested the proposal should be extended to include these other organisations and Acts, taking a whole of system approach.
- New Zealand is a diverse country with a range of environments. This needs to be recognised and provided for and might mean a consistent set of national indicators is impracticable.
- As noted above under question 7, some submitters questioned why the proposed option is to amend section 360 of the RMA rather than using existing RMA mechanisms to develop national environmental standards. It was felt national environmental standards could be more descriptive than the proposed option. It was felt the public and stakeholders would have more opportunity to participate in the development of a national environmental standard than they might for the proposed regulations.
- Some submissions from local authorities noted they use section 35 of the RMA as a driver for environmental monitoring. Section 35 provides for a duty to gather information, monitor, and keep records, including the state of the whole or any part of the environment of its region or district and the efficiency and effectiveness of policies and plans developed under the RMA. It was felt this section of the RMA would also need to be amended and there could be confusion if this additional amendment was not made. Some submitters suggested section 30, 31 and 36 of the RMA might also need to be amended.
- It is not clear how the proposal will impact on territorial authorities. Some territorial authorities also collect data that will be required for national state of the environment reporting, such as on waste and biodiversity.
- A number of submitters commented that there has already been a significant amount of work undertaken by both central and local government on environmental indicators. The proposed option should build on this work rather than undermine or duplicate it. Examples of existing initiatives include national environmental standards on fresh water and air quality; 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).

- Further information was requested on how indicator priorities will be agreed with PCE and data transferred from councils to the PCE.
- Monitoring is about more than collecting data. There is often laboratory testing, quality assurance of the data, data entry and data storage. Additionally, any monitoring requirements need to be underpinned by sound research and science.
- The legislative amendment should include an agreed overarching framework detailing who will do what, how data will be collected, why particular data is collected and how it will be analysed.
- All data collected should be made publically available under the “Declaration on open and transparent government” and “New Zealand data and information management principles”.

A number of submitters considered a detailed cost-benefit analysis is required before this initiative is progressed. As noted above, this should include the cost to local authorities and how the monitoring work will be funded.

The majority of submitters expressed an interest in being involved in helping shape the regulations that would be developed if the government proceeds with the proposal to amend section 360 of the RMA.

There was some cross-over between the issues raised in response to this question and those raised under the reporting questions. Examples include the transfer of information between local authorities and PCE, and roles and responsibilities of PCE, the Ministry and local authorities.

Question 15: Which environmental domains (eg, fresh water, land, oceans) do you think should be prioritised for improvements in consistency?

Table 1 summarises the domains submitters suggested should be priorities for improvements in consistency. The most common suggestions were fresh water, land, oceans (including coastal and marine), and biodiversity. Note that many submitters suggested more than one domain should be prioritised.

Table 1: Environmental domains that should be prioritised for improvements in consistency

Domain	Number of submitters suggesting should be prioritised
Fresh water (including water resources)	23
Land	10
Oceans, coastal and marine	10
Biodiversity	9
Estuarine	4
Ecosystem services (including lowland areas)	3
Air	3
Geothermal	3
Soils	2
Iwi and culture	1
Emissions from land	1
Specific locations	1
Reflect government priorities	1

5 Costs and benefits

Question 16: Have we accurately reflected the high level costs and benefits arising from the proposals for an Environmental Reporting Bill? Please give reasons.

There was a mixture of answers to this question, including that the high-level costs had been accurately reflected through to they had not been reflected. Some submitters commented that the Document was very high level and did not contain sufficient detail to enable them to comment on the costs and benefits of the proposals.

As noted above, a number of submitters commented that more cost benefit analysis is required before this proposal is progressed, particularly on the option to produce regulation on monitoring for national state of the environment reporting.

Also as noted above, a number of submitters raised concerns about who would be responsible for any additional cost of collecting data for national environmental reporting. It was generally felt that central government should cover this cost because they currently fund the monitoring activities of crown research institutes. There was a strong message in the submissions that ratepayers and resource consent holders should not be expected to cover any additional cost.

Question 17: Can you identify any other high level costs and benefits?

A number of submitters thought there is a value to New Zealand being able to validate the New Zealand brand ('100% Pure NZ', 'NZ Inc', etc). This is important for exporter's trying to position themselves in the global marketplace. For example, one submission noted it has been estimated that \$184 billion of ecosystem services is provided from New Zealand's marine resources. Additionally, there is value in being able to provide international customers assurances that New Zealand goods are not causing environmental problems and meet OECD reporting requirements.

It was suggested information could also be included on the following costs and benefits.

- The cost of regulating consistency of monitoring across all agencies including local authorities, central government, crown research institutions and universities. One submitter suggested the cost should be shared equitably among the beneficiaries, remembering that there is a large element of public good associated with state of the environment reporting. A targeted tax was also suggested.
- The cost of resourcing PCE to produce the national state of the environment report.
- The cost of developing the monitoring programme and the ongoing implementation costs, including the cost to local authorities and how these compare to the cost of strengthening existing systems and practices. This should also include the cost of science and research that will be required to design an appropriate monitoring programme.
- The cost of establishing and maintaining an open access data management facility.
- The benefits of having improved environmental monitoring and reporting are not discussed or costed and should be. The availability of high quality environmental data will have significant benefits for international reporting, assessing policy interventions and bringing litigation against polluters.
- An additional high-level benefit is policy makers and the public will be able to assess whether measures implemented to address environmental problems have been effective. A similar benefit identified was that environmental reporting will enable scanning for emerging environmental problems.
- Some submitters considered the proposal would reduce duplication between departments and local government, and that this benefit should be included in the cost-benefit analysis.
- There was a suggestion that the benefits might accrue at a national level while costs accrue at the regional level.

Question 18: Do you have any information you would like to see included in the final cost-benefit analysis that will be carried out after the submissions are received and analysed?

Some councils and research bodies identified they could provide information on the cost of their existing regional monitoring programme. A number of non-local government submitters identified that they also collect environmental data.

6 Other comments

Some submitters made comments that did not fit into the categories or questions above. Additional comments of interest included the following.

- The state of the environment report and monitoring needs to be audited or peer-reviewed to ensure it is credible.
- Some submitters felt the Document read like central government was criticising or blaming councils for the problems around national state of the environment reporting when it is not councils' role to collect national data.

It was not the intention of the Document or proposal to blame or criticise local government for the issues around national environmental monitoring and reporting.

- All data collected should be made publicly available under the “Declaration on open and transparent government” and “New Zealand data and information management principles”. At least one council is already developing a web-based portal to proactively manage and disseminate their data.
- Some Treaty of Waitangi settlements and the resulting accords include environmental monitoring. At a minimum, this should be acknowledged.

Appendix 1: Submitters

1	General public (iwi perspective)	24	Otago Fish and Game Council
2	Christchurch Botanic Gardens	25	Nelson City Council
3	Grey District Council	26	Scion
4	Plant and Food	27	TEC Services
5	Parliamentary Commissioner for the Environment	28	Bay of Plenty Regional Council
6	Water New Zealand	29	New Zealand Fertiliser Manufacturers' Research Association
7	Glass Packaging Forum Inc	30	New Zealand Hydrological Society
8	Consultant	31	IPENZ, Engineers New Zealand
9	Mid Dome Wilding Trees Charitable Trust	32	Waitaki Irrigators Collective Ltd
10	Waitaki District Council	33	New Zealand Marine Sciences Society
11	Whangarei District Council	34	Consultant
12	Former Parliamentary Commissioner for the Environment	35	Northland Regional Council
13	Te Arawa River Iwi Trustees (TARIT)	36	New Zealand Ecological Society
14	Environment Southland	37	Environmental Research Institute
15	Environment Canterbury Regional Council	38	NZ Forest Owners Association Inc
16	Far North District Council	39	Joint Centre of University of Canterbury and Lincoln University
17	Local Government New Zealand	40	Federated Farmers of New Zealand
18	Department of Civil and Natural Resources Engineering	41	Ministry of Health
19	Royal Forest and Bird Protection Society of New Zealand Inc	42	Grant Thornton New Zealand Audit Partnership
20	New Zealand Historic Places Trust Pouhere Taonga	43	Business New Zealand
21	Environment Waikato	44	Watercare Services
22	Gisborne District Council	45	Trustpower Limited
23	Taranaki Regional Council	46	Sustainability Matters
		47	NIWA
		48	Greater Wellington Regional Council

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| 49 | Westcoast Regional Council | 63 | Horizons Regional Council |
| 50 | Waikato Raupatu River Trust | 64 | Solid Energy Ltd |
| 51 | Science Support Service | 65 | Enviro Solutions NZ Ltd |
| 52 | Waterways Centre for Freshwater Management | 66 | Irrigation New Zealand Inc |
| 53 | Pacific Institute of Resource Management | 67 | Landcare Research |
| 54 | The Royal Society of New Zealand | 68 | Research Management Services & Graduate Research School |
| 55 | Straterra Inc | 69 | Public Health South |
| 56 | Roading New Zealand | 70 | Auckland Council |
| 57 | Otago Regional Council | 71 | Sustainable Future Institute |
| 58 | New Zealand Freshwater Sciences Society, University of Waikato | 72 | Palmerston North City Council |
| 59 | Meridian Energy Limited | 73 | Marlborough District Council |
| 60 | Environmental Defence Society | 74 | General public |
| 61 | New Zealand Seafood Industry Council | 75 | Fish & Game NZ |
| 62 | New Zealand Institute of Forestry (NZIF) | 76 | Selwyn District Council |