

Submission to the Local Government and Environment Select Committee on “ENVIRONMENTAL REPORTING BILL” (APRIL 2014)

INTRODUCTION

1. Straterra¹ welcomes the opportunity to submit on the Environmental Reporting Bill. Straterra does so in the context of its advocacy for better policies for the New Zealand minerals sector to grow in a responsible way, within the sustainable management paradigm. National environmental reporting is an important, even essential input into achieving that.
2. Straterra submitted² on the 2011 discussion document “Measuring up: environmental reporting”, released for consultation by the Ministry for the Environment. In that submission, we advocated for national environmental reporting to be carried out by Statistics NZ, as the fit-for-purpose agency. We also argued that the Parliamentary Commissioner for the Environment should retain her current role, as an independent commentator on environmental matters, as opposed to holding the function of preparing national environment reports.
3. In preparing this submission, Straterra consulted with Business NZ, as we did previously in relation to the discussion document. We support the Business NZ submission on the Bill.

EXECUTIVE SUMMARY/DISCUSSION/RECOMMENDATIONS

4. Straterra generally supports the Bill, as fit for purpose. The Ministry for the Environment is the relevant policy agency, and Statistics NZ is the appropriate operational agency, for the obvious reason that national environmental reporting sits squarely within their roles and functions.
5. **Clause 3** on purpose is supported, as logical.
6. In **clause 4** on interpretation, “ecological integrity” is not defined. It should be. The Department of Conservation would be able to provide a suitable definition.
7. **Clause 7 (1) (c)** on content of synthesis reports is not sufficient, especially in the absence of a definition of ecological integrity.

¹ Straterra is the voice of the NZ minerals sector. Our membership comprises producers, explorers, research providers, engineering and geotechnical firms, equipment suppliers, and providers of ancillary services, e.g., legal, financial, environmental <http://www.straterra.co.nz/about/>

² Straterra submission to MfE on the environmental reporting discussion document 2011 <https://www.mfe.govt.nz/environmental-reporting/about-environmental-reporting/submissions/55-straterra-inc.pdf>

8. According to our understanding, ecological integrity (**clause 7 (1) (c) (i)**) is an aggregate measure of ecosystem composition, structure and function in relation to indigenous biodiversity, with each component weighed in some way to produce an index. Other terms for the components are: “indigenous dominance, species occupancy, and ecosystem representation”³.
9. Arguably, there is more to biodiversity than its ecological integrity, depending on how “function” is defined. In its narrowest sense, that would refer to the safeguarding and maintenance of intrinsic value”⁴.
10. We suggest that the definition of “function” could be expanded to include the role of biodiversity as a stock of natural capital, and the related flows of ecosystem services – which have economic value.
11. In this context, the concept of “ecosystem resilience” arises. Notionally, an ecosystem can be resilient, and a provider of ecosystem services, even if its composition and structure are in a less than pristine state.
12. To illustrate:
 - Pasture may contain very little indigenous composition and structure, yet may provide important ecosystem services as a source of food for livestock;
 - The European honey bee is an important pollinator of economic plants in New Zealand, and is the source of commercial honey production, but is not a native species;
 - Trout are not native to New Zealand, however, are now part of our freshwater ecosystems (which are, perhaps, directly compromised by trout as a predator of native species), and are a source of significant economic value for New Zealand.
13. Therefore, we believe that ecological integrity, though important, is not a sufficient descriptor of the state of, and trends in, indigenous, modified indigenous, and non-indigenous biodiversity in New Zealand. **Clause 7 (1) (c) (i)** needs to be amended to provide for “fair and accurate” reporting (viz. **clause 15**) on the biodiversity component of the environment.

³ Landcare Research. 2012. “Department of Conservation biodiversity indicators: 2012 assessment”
http://www.landcareresearch.co.nz/publications/researchpubs/department_of_conservation_biodiversity_indicators_2012_assessment.pdf

⁴ Arguably, there is no such thing as intrinsic value because “value” is a human construct.

14. We note that “culture and recreation” (**clause 7 (1) (c) (iv)**) are straightforward examples of economic benefit or value arising from the non-consumptive direct use of the environment, and, possibly, non-use, and are, therefore, a subset of **clause 7 (1) (c) (iii)**. Refer to the Business NZ explanation of the Total Economic Value framework in their submission. Refer also to the Millennium Ecosystem Assessment⁵ for a description of ecosystem services.
15. The disclaimer in **clause 7 (3)** is important – that information gathering must be done at reasonable cost and effort – however, should not form a justification for skewed reporting on the environment (cf. **clause 15** requiring reports to be “fair and accurate”). The earlier discussion on ecological integrity refers.
16. Paras 7 – 15 of this submission are relevant to **clause 10** on domain reports.
17. **Clause 17** on the role of the Parliamentary Commissioner for the Environment is supported, as consistent with section 16 of the Environment Act 1986, which describes the functions of the Commissioner. Refer also to para 4 of this submission, and our introduction.
18. **Clause 18 (3)** on regulations should be expanded to include consultation with the public, as an appropriate policy process, and for consistency with many other government policy processes.

⁵ MA 2005 <http://www.millenniumassessment.org/en/index.html>