

NEW ZEALAND ECOLOGICAL SOCIETY

Ministry for the Environment
P.O. Box 10362
Wellington 6143

17 October 2011

Submission from New Zealand Ecological Society on the Environmental Reporting Bill

The New Zealand Ecological Society (NZES) was formed in 1951 to promote the study of ecology and the application of ecological knowledge in all its aspects. Through its activities, the Society attempts to encourage ecological research, increase awareness and understanding of ecological principles, promote sound ecological planning and management of the natural and human environment and promote high standards both within the profession of ecology by those practicing it, and by those bodies employing ecologists. The NZES publishes the New Zealand Journal of Ecology which is the primary scientific publication in New Zealand for research on indigenous biodiversity in New Zealand. The Society has over 600 members including practicing ecologists and research scientists working within universities, crown research agencies, government departments, regional councils, territorial local authorities, private consultancies and community restoration groups.

The NZES strongly supports improvements in national environmental reporting in New Zealand, particularly monitoring and reporting on indigenous biodiversity and ecological issues. New Zealand's indigenous biodiversity is of critical importance to the environmental, economic, cultural and spiritual health and identity of New Zealand as a country, and its continued decline is an erosion of our wealth and future potential.

The uniqueness and importance of New Zealand's biodiversity on an international scale has been widely recognised. Part 1 of the New Zealand Biodiversity Strategy states: *Isolation is a strong theme of New Zealand's biological and cultural histories. Evolution through a long period of isolation created unique flora and fauna. After splitting off from other continents 80 million years ago, the New Zealand landmass became the stage for the evolution of plants and animals so distinctive that it has been described as the closest scientists will get to studying life on another planet¹.*

¹ Diamond, J. 1990. New Zealand as an archipelago: an international perspective. In Ecological Restoration of New Zealand Islands, pp 3—8. Department of Conservation, Wellington

The NZES has the following comments regarding the discussion document “Measuring Up – Environmental Reporting – A discussion document”. If applicable, numbers in parentheses in this section (e.g. Q 1) refer to questions outlined in the accompanying “Consultation Questions” document:

- The NZES strongly supports improvements in national environmental monitoring and reporting in New Zealand. The inconsistent state of environment monitoring and lack of statutory obligation to report need to be resolved (Q 1-3). Monitoring is critical to understanding and managing natural ecosystems, and indigenous flora and fauna.
- The NZES recommends that particularly monitoring and reporting on indigenous biodiversity and ecological issues need improvement (Q 3, 15).
 - A large proportion of New Zealand’s indigenous vegetation and species are found only in New Zealand and this makes NZ unique internationally and recognised as a biodiversity hotspot (one of 34 international biodiversity hotspots)².
 - Monitoring of indigenous forests and ecosystems has been identified as very important for fulfilling the objectives of the NZ Biodiversity Strategy, and for effective biodiversity management (Green and Clarkson 2005)³. Monitoring is also important for improving our knowledge of ecosystem dynamics (Allen *et al* 2003)⁴.
- The NZES supports an organisation, such as Parliamentary Commissioner for the Environment, having an independent role in environmental reporting (Q 6). However, we urge that this organisation is adequately resourced and funded, and has the capacity and appropriate expertise to successfully undertake its task.
- The lowland ecosystems of New Zealand need to be a key focus of an ongoing programme of biodiversity monitoring of state, condition and trends (Q 13, 15).
 - New Zealand’s indigenous biodiversity, in particular in lowland ecosystems, has been significantly impacted by land use change and the impacts of pest plants and animals. Much of New Zealand’s remaining unprotected lowland habitat occurs on private land. These threatened lowland habitats and ecosystems are not adequately represented on Public Conservation Land, and are increasingly vulnerable to ongoing pressures from surrounding land use (Walker *et al.* 2006⁵). The current state of biodiversity monitoring and reporting in these threatened and rapidly changing landscapes, particularly lowlands and outside off DoC estate, is patchy or non-existent.

² http://www.biodiversityhotspots.org/xp/hotspots/new_zealand/Pages/default.aspx

³ Green W. and Clarkson B. 2005: Turning the tide? A review of the first five years of the New Zealand Biodiversity Strategy. The synthesis report. Wellington: Biodiversity Chief Executives

⁴ Allen R.B., Bellingham P.J. and Wiser S.K. 2003: Developing a forest biodiversity monitoring approach for New Zealand. *New Zealand Journal of Ecology*. 27 (2): 207-220

⁵ Walker, S., Price, R., Rutledge, D., Stephens, R.T.T. and Lee, W.G. (2006) Recent loss of indigenous cover in New Zealand. *New Zealand Journal of Ecology* 30 (2): 169-177.

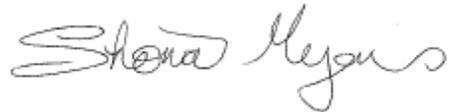
- There is a need to build from existing biodiversity monitoring systems, e.g. national wetland monitoring system; permanent forest and grassland plot monitoring systems; LENZ⁶; and Department of Conservation, and Regional Council programmes currently being developed. Co-ordinated and standard methods need to be developed without losing significant work that has already been achieved.
- There is a need for significant regional and local government input and support for establishment of biodiversity monitoring that provides both national and regional level results.
 - Although a national framework is needed, it is important that regionally important biodiversity monitoring that has been carried out in the past is recognised and will continue to be supported.
- 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.
- 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.
- Data needs to be publicly available and communicated.
- 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*”.
- 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 two main benefits of regular independent state of the environments 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

⁶ <http://www.landcareresearch.co.nz/databases/lenz/>

a pre-conceived image. The wording (p. 27) should be changed to “greater transparency in quantifying New Zealand’s state of the environment”.

We hope the points made in this submission will be useful and look forward to hearing from you.

Yours sincerely

A handwritten signature in cursive script that reads "Shona Myers".

Shona Myers
Secretary, NZ Ecological Society