18 August 2026

Committee Secretariat,
Environment Committee,
Parliament Buildings,
Wellington.

Submitted via: en.legislation@parliament.govt.nz

Tēnā koutou,

**Submission of Manawatū District Council on the Environmental Reporting Amendment Bill**

Manawatū District Council (MDC) thanks the Environment Committee for the opportunity to submit on the Environmental Reporting Amendment Bill (the Bill).

**Introduction**

MDC supports the Bill's objective of ensuring that New Zealanders and decision-makers have access to independent, authoritative and useful information about the state of the environment. MDC therefore supports the amended purpose proposed by the Bill.

Council also supports several elements of the Bill in principle, including the addition of drivers and outlooks to environmental reports, a clearer definition of 'pressures,' the ability to examine interconnected environmental issues, improved environmental indicators and monitoring standards, and the establishment of a standing expert panel.

However, Council has concerns about whether the Bill, as currently drafted, will provide the timely, comprehensive and independent environmental evidence needed by local government. In particular, Council is concerned that the proposed move from three-yearly to six-yearly state-of-environment reporting is not accompanied by sufficient statutory safeguards between reports, including a mid-cycle integrated stocktake; that the commentary regime leaves considerable discretion over topic and timing; that there is no formal government response to environmental findings and data gaps; and that the institutional arrangements for the Strategic Evidence Panel do not fully secure its transparency and independence.

It is further noted that the six-year cycle proposed equates to two full parliamentary terms, such that the ability to objectively evaluate the impact of government environmental policy change made within the first three years may be diluted or obscured by changes to policy made by an incoming government over the second half of the reporting period.

These concerns need to be considered in the context of the wider environmental, planning, climate adaptation and local government reform programme. The importance of reliable environmental information is increasing at the same time as the Bill proposes to reduce

the frequency of New Zealand's principal integrated assessment of environmental conditions.

**Background**

Manawatū District is a provincial district comprising Feilding, rural settlements and extensive productive rural land. The district extends from the Ruahine Ranges in the east to the Tasman Sea in the west and encompasses hill country, river valleys, fertile plains and coastal environments. Its landscape is shaped by significant river systems, including the Rangitīkei, Ōroua, Pohangina and Manawatū rivers and their tributaries. This geographic diversity contributes to the district's productive strengths, but also means that environmental conditions and risks can vary considerably across the district. The primary sector is a significant part of the district's economy and identity, with land, water, weather and environmental conditions directly affecting households, rural communities, businesses and the wider local economy.

In exercising its responsibilities for district planning, drinking water, wastewater, stormwater, local roads, emergency management, infrastructure strategy, asset management and long-term financial planning, MDC must assess how environmental conditions and natural hazards may affect communities, services and investment over several decades. These decisions must be evidence-based and publicly defensible, particularly where they create long-term costs for a provincial and substantially rural rating base.

The district is exposed to interconnected environmental pressures and states, including river and surface flooding, drought and water-security risk, projected changes in rainfall patterns and extreme rainfall, land-use pressures, freshwater health, pressures on indigenous biodiversity, and the resilience of rural and urban infrastructure.

MDC relies on its own operational information, scientific and hazard information held by Horizons Regional Council, and national environmental datasets and assessments. National reporting does not replace regional monitoring or location-specific evidence, but it provides a consistent national benchmark, offers context and data for trends and issues which are pan-regional in scale (e.g. climate change and external threats to indigenous biodiversity and agriculture), supports comparison of long-term trends across environmental domains, and strengthens public accountability for environmental change.

National environmental reporting is therefore an important supporting and accountability layer for MDC's Long-term Plans, infrastructure strategies, growth and land-use decisions, emergency preparedness and future climate adaptation planning.

**Reporting Cycle and Transition**

Although ***Our Environment 2025*** provides a recent national whole-of-environment baseline, the Bill is proposed to commence on 1 May 2027 and the first state-of-the-environment report under the amended system would not be required until before 1 April 2031. This would create an interval of up to six years between integrated national assessments. During that period, significant planning, adaptation and institutional

reforms are being proposed and others are already being implemented. These include (but are not limited to) new legislation to replace the Resource Management Act 1991 (RMA), new national direction under the RMA, projects under the Fast-track Approvals Act 2024, changes to climate change legislation, changes to Emergency Management legislation, and the reform of local government itself (which could result in changes to the form and functions of regional councils).

Council's concern is not the absence of environmental evidence, but the risk that emerging and cumulative changes across environmental domains, including any effects arising during implementation of significant planning, development and institutional reforms, may not be brought together in a new, authoritative national synthesis at a sufficiently useful point in the reform cycle.

MDC recognises the case for a six-yearly full synthesis: a longer cycle may allow deeper cross-domain analysis, reduce repetitive reporting and lessen demands on central government agencies and data providers. It also acknowledges that the Parliamentary Commissioner for the Environment supported a six-yearly cycle in his 2022 submission because it largely reflected his 2019 recommendations. It is worth noting that those recommendations pre-dated the scale and pace of the current environmental, water services and local government reform programme.

The Commissioner's support however noted recommendations for a mandatory government response and action plan, core indicators prescribed in regulations and reviewed after three years, commentaries focused on materially changed information and emerging issues, and powers to actively collect data. Council therefore considers that the six-year cycle should be assessed as part of a complete package of safeguards, rather than in isolation.

On that basis, MDC does not oppose a six-yearly full state-of-the-environment report in principle. It considers the interval acceptable only if the Act also requires a comprehensive mid-cycle stocktake no later than three years after each full report, updating the core indicators and identifying material changes across all prescribed topics. This would retain the benefits of a deeper six-year synthesis while providing councils and the public with a regular integrated check on whether environmental conditions are materially changing.

**Commentary reports and integrated reporting**

Council considers that annual commentary reports are a useful addition, but they are not a complete substitute for a current whole-of-environment synthesis. Commentary reports may be topic-specific, may span one or more domains, and need only ensure that each prescribed topic is covered once within each six-year period between state-of-the-environment reports. That approach may improve flexibility, but it does not guarantee the regular availability of a nationally integrated stocktake suitable for councils, communities, and infrastructure providers making strategic decisions across multiple environmental domains. Because the natural environment is interconnected, a commentary focused on one domain may miss changes in pressures or environmental states occurring elsewhere that are contributing to, or affected by, the issue being examined.

Council is also concerned that the proposed commentary framework may not provide sufficient assurance that rapidly changing environmental issues will be assessed and reported when conditions materially change. This is particularly relevant for environmental matters where significant changes may occur over relatively short periods, such as freshwater quality or air pollution events. While the underlying monitoring of these matters may continue more frequently, timely statutory reporting remains important because it brings that information together, interprets its significance and makes emerging trends visible to decision-makers and the public. Council therefore considers that the commentary programme should be sufficiently responsive to revisit prescribed topics where monitoring or other evidence indicates material change, rather than relying solely on the requirement that each topic be covered once during the six-year cycle.

Council also notes the Regulatory Impact Statement's own implementation risk that some environmental areas may be repeatedly overlooked because another issue is seen as more urgent. A requirement to cover each prescribed topic once within six years does not fully address that risk. It ensures eventual coverage, but not that information will be current when councils must make decisions or that changes across climate, freshwater, land, biodiversity and natural hazards will be assessed together.

**Strategic Evidence Panel**

MDC requires more clarity about the governance design of the proposed Strategic Evidence Panel. The Bill describes the Panel as providing independent advice, but the Secretary sets the terms of reference, appoints members in consultation with the Minister, and may remove members for just cause. The Ministry also provides secretariat support. Council accepts that this model may be administratively workable but considers that the Bill should contain stronger safeguards if the Panel is to carry public confidence as an independent source of strategic advice. At present the Bill contains no express requirement to publish the Panel's advice, no requirement to publish the Secretary's response to that advice, and no explicit requirement for membership to include expertise from local government, climate adaptation, mātauranga Māori, or environmental statistics beyond the broad requirement that members collectively hold relevant expertise.

MDC notes that the Regulatory Impact Statement itself places considerable weight on the value of independent expert advice and on the need for a range and diversity of expertise. It also records that earlier respondents raised cost, resourcing and capacity concerns, particularly for local government and other environmental data holders. Those matters reinforce the importance of a transparent, balanced and trusted panel architecture.

Council considers that the Panel's independence should be demonstrated through its statutory design, not only through its description. The Act should require transparent appointment criteria, publication of the Panel's terms of reference and substantive advice, disclosure and management of conflicts, and a published response where the Secretary does not adopt a material recommendation. The Panel should collectively include expertise in environmental science, official statistics, climate adaptation, mātauranga

Māori, public health, environmental economics, infrastructure and the practical use of environmental evidence by local government. This need not make the Panel representative of sector interests; it would ensure its advice is informed by the systems that collect and use the data.

**Data Collection, Standards and Indicator Continuity**

MDC also notes that the Bill strengthens the Secretary's role in setting indicators and standards but does not impose direct express duties on local authorities to provide data. While that limits the Bill's direct compliance burden on councils, it is likely to create practical expectations around data interoperability and timing. Council therefore considers that any national indicator-setting or standards-setting process that materially affects local-government-held data should involve meaningful consultation with local government and should be supported by realistic implementation pathways and funding arrangements where change is required.

New section 14B is especially relevant. It requires the Secretary to specify scientific environmental monitoring standards and methods, but unlike new section 14A, which expressly requires consultation with the Government Statistician before indicators are set, it does not expressly require consultation with councils, iwi, monitoring agencies or other affected data providers before standards and methods are introduced or materially changed. Council considers that this is a significant omission.

Council's concern is not that the proposed reporting cycle itself will increase costs for councils. The risk arises at implementation: new standards, methods or data specifications may require changes to monitoring programmes, systems, metadata, quality assurance or reporting timetables. Council acknowledges that the Planning Bill and Natural Environment Bill also contain monitoring and reporting requirements that may generate some of the information required under this Bill. However, those requirements are primarily directed at assessing the implementation and effectiveness of national direction, plans and environmental limits, and may not capture wider environmental trends, cumulative pressures or emerging issues.

The legislation should therefore require early consultation, transparent assessment of implementation implications, reasonable transition periods and appropriate funding where national requirements create material new costs.

Indicator continuity is equally important. The Bill does not expressly require a stable core set of indicators, reasons to be published when indicators change, parallel reporting when methods change, or preservation of comparability across reporting cycles. Without those safeguards, apparent changes in environmental condition may reflect a change in indicator or methodology rather than a real environmental trend.

This continuity will be particularly important if local government reform results in changes to regional council functions or structures. Regional councils hold long-running environmental datasets, monitoring programmes and specialist expertise, and any

transfer of responsibilities will need to preserve data stewardship, monitoring continuity and institutional knowledge.

**Data and Evidence Priorities and Government Accountability**

Council supports the proposed Data and Evidence Priorities Report, but its value will depend on what follows. Under the Bill it must be produced within six months of each state-of-the-environment report, meaning it may operate on the same six-year cycle. The Bill does not require a government response, an implementation plan, named delivery agencies, funding decisions or public progress reporting.

The need to address these gaps is not new. The Parliamentary Commissioner for the Environment has previously identified significant gaps and inconsistencies in New Zealand's environmental information and the difficulties these create for understanding environmental change. The Data and Evidence Priorities Report provides an opportunity to systematically identify and prioritise those deficiencies.

The Regulatory Impact Statement and Cabinet material also acknowledge that the amendments will not fill all environmental data gaps, and that sustained investment will be required. Council is concerned that gaps could be repeatedly identified without a clear mechanism for addressing them. A formal government response should set out which priorities are accepted, how they will be progressed, who is responsible and how progress will be reported. This would preserve the independence of the evidence while ensuring accountability for the response.

**Reporting Against Statutory Outcomes and Limits**

New sections 8(3) and 11(3) provide that reports may compare environmental findings with relevant policy outcomes, targets, limits or goals set in legislation. Council considers that reporting against applicable statutory limits and outcomes should be mandatory. A national reporting system intended to support environmental stewardship should not leave it entirely discretionary whether the public is told if legislated environmental requirements are being achieved.

Reports should distinguish binding statutory limits and outcomes from non-statutory government priorities. Where evidence permits, they should also describe the significant statutory, policy, investment or management responses already in place and the available evidence about whether those responses are influencing outcomes. This would complete the feedback loop without turning independent reporting into policy advocacy.

**Independence of Environmental Reporting**

The Bill transfers sole responsibility for producing and publishing environmental reports to the Secretary, while the Government Statistician's role is narrowed to producing statistics and participating in specified consultations. It also removes the joint ministerial recommendation currently required for topic regulations. Council understands the

objective of clearer accountability but considers that the changes concentrate significant influence over reports, indicators, standards and topics in a single office.

Formal statistical assurance is important to maintain consistency, comparability, transparent methodology and public confidence, particularly where findings may be politically or economically contentious. Council therefore supports either retaining joint production or requiring the Government Statistician to publish an independent statistical assurance statement covering the statistics, methodologies, consistency and comparability used in each report.

**Topic Regulations and Local Usefulness**

The scope of reporting will also depend heavily on the Environmental Reporting (Topics for Environmental Reports) Regulations. The Bill leaves those topics to regulations recommended by the Minister for the Environment, rather than jointly by the Environment and Statistics Ministers. Council considers that the regulations should be developed and amended through a transparent process involving the Government Statistician, the Strategic Evidence Panel, local government, iwi and relevant science and monitoring bodies. The evidence supporting topic selection should be published.

National-level reporting should also be capable of informing decisions below the national scale. National averages can obscure significant variation between regions and catchments. Indicators and underlying data should therefore be spatially disaggregated to regional, catchment or local scales where data quality and methodology permit, with clear explanations where this is not possible. Data should be provided in accessible, machine-readable and geospatially usable formats, with metadata, uncertainty statements and documentation of methodological changes.

**Te Tiriti, Mātauranga Māori and Environmental Information**

The earlier consultation recorded support for stronger Māori participation, core Māori indicators, appropriate incorporation of mātauranga Māori and resourcing for participation. Council considers that the Strategic Evidence Panel should expressly include mātauranga Māori expertise and that iwi and hapū should be appropriately involved in developing relevant indicators, standards and methods. This involvement must protect culturally sensitive knowledge and respect appropriate Māori data sovereignty and governance.

**Review of the Amended Framework**

Council considers that the amended reporting framework should be reviewed within three years of commencement. This would allow Parliament to assess whether the commentary reports are providing sufficiently current and integrated information, whether the indicator and monitoring-standard processes are working effectively, whether data-sharing

arrangements are adequate, and whether the Strategic Evidence Panel is operating independently and transparently.

An early review would be preferable to waiting until the first full six-year reporting cycle has been completed. It would not affect the Parliamentary Commissioner for the Environment's ability to examine the environmental reporting system independently under the Commissioner's existing functions.

**Recommendation**

MDC recommends that the Committee amend the Bill to:

1. Retain the proposed six-year cycle for full state-of-the-environment reports only if the Bill also requires a comprehensive mid-cycle stocktake no later than three years after each full report, identifying material changes across all prescribed topics and updating the core environmental indicators. If that safeguard is not adopted, retain a three-yearly integrated reporting requirement. Council considers this mid-cycle stocktake a fundamental safeguard within the proposed six-year reporting model.
2. Strengthen the commentary reporting provisions by requiring a publicly available forward work programme, regular updating of material indicators and appropriate consideration of cumulative and cross-domain environmental effects. The framework should also provide for prescribed topics to be revisited where monitoring or other evidence indicates material or rapidly emerging environmental change. It should also preserve a stable core set of indicators and require transparent documentation of changes to indicators or methods so that environmental trends remain comparable over time.
3. Require environmental reports, where applicable, to assess progress against statutory environmental outcomes, targets and limits rather than leaving that assessment entirely discretionary. Reports should also, where evidence permits, describe significant existing responses and the available evidence of their effectiveness.
4. Require the Government to publish a formal response to each state-of-environment report and Data and Evidence Priorities Report, including the action proposed in response to significant findings and evidence gaps. The response should identify responsible agencies, implementation steps, funding implications and arrangements for public progress reporting.
5. Require meaningful consultation with local government, iwi and other affected data providers before environmental indicators, monitoring standards or methods are set, together with transparent assessment and appropriate funding of any significant implementation costs. This should include a statutory consultation requirement before monitoring standards, methods or topic regulations are made or materially amended, reasonable transition periods and protection of long-term data series.

6. Provide the Secretary with clear and proportionate powers and responsibilities to secure the data necessary to populate core environmental indicators, subject to statutory protections, consultation with affected data providers, transparent cost assessment and appropriate funding where new obligations arise.
7. Strengthen the role of the Government Statistician by retaining joint production of environmental reports or requiring the Government Statistician to publish an independent statistical assurance statement on the quality, methodology, consistency and comparability of each report.
8. Strengthen the independence and transparency of the Strategic Evidence Panel through clear appointment criteria, an appropriate range of expertise, publication of substantive advice and publication of the Secretary's response to that advice.
9. Ensure that environmental data and indicators are published, where practicable, at useful national, regional and catchment scales and in accessible formats that can be incorporated into local government planning, infrastructure and adaptation processes. Publication should include underlying data, metadata, uncertainty information and machine-readable and geospatial formats where practicable.
10. Provide appropriate mechanisms for iwi and hapū participation, mātauranga Māori expertise and Māori data governance within the environmental reporting system.
11. Request an independent statutory review of the amended reporting framework within three years of commencement, before the first complete six-year cycle has elapsed, while preserving the Parliamentary Commissioner for the Environment's existing independent oversight role.

**Conclusion**

MDC supports the objective of improving the quality and usefulness of environmental reporting. Council does not oppose a six-yearly full synthesis in principle but considers that the framework must also provide a mandatory mid-cycle integrated stocktake and regularly updated core indicators. Greater flexibility, better indicators, stronger standards and more forward-looking analysis are worthwhile reforms. However, those improvements should not come at the expense of the currency, independence, comprehensiveness or practical usefulness of New Zealand's environmental evidence base.

The decisions facing councils are increasingly long-term and consequential. MDC must plan for infrastructure, growth, natural hazards, environmental management and climate adaptation while managing affordability pressures for a provincial and substantially rural community.

The national environmental reporting system must provide a sufficiently regular and authoritative foundation for those decisions. It should also ensure that significant environmental findings and evidence gaps lead to transparent consideration and accountability, rather than publication alone.

MDC asks the Committee to amend the Bill accordingly.

MDC does not wish to speak to this submission.

Yours sincerely,

Michael Ford

**Mayor**