



14 August 2026

Environment Committee
Parliament Buildings
Wellington

Via online submission portal

Otago Regional Council Submission on the Environmental Reporting Amendment Bill

Otago Regional Council (ORC) welcomes the opportunity to provide feedback on the Environmental Reporting Amendment Bill.

Support for more efficient and useful reporting

ORC supports, in principle, the proposal to replace the current reporting framework with six-yearly state of environment reports, supported by commentary reports.

A longer state of environment reporting cycle may provide a more meaningful basis for assessing long-term environmental trends. Shorter reporting cycles can be influenced by short-term natural fluctuations, such as wet or dry years, flood events, droughts, seasonal variation, or other temporary changes that may not reflect the underlying long-term trend.

However, ORC notes that there is a balance to be struck between robust long-term reporting and public expectations for timely, accessible environmental information. The proposed commentary report mechanism will therefore be important to ensure national reporting can still respond to emerging issues, unexpected environmental change, or matters of significant public interest between six-yearly state of environment reports.

Drivers and outlooks

ORC supports the proposed inclusion of “drivers” and “outlooks” in environmental reporting.

This change could make national reporting more useful for decision-making by shifting reporting from simply describing the current state of the environment and observed trends, to also explaining what is driving environmental pressures and what future risks or opportunities may need to be planned for.

Environmental indicators, standards, methods and data priorities

ORC supports the intent to improve national consistency through environmental indicators, monitoring standards and methods, and data and evidence priorities reports.

Regional councils should be directly involved in developing these indicators, standards, methods and priorities. Regional councils collect and manage much of the environmental data that national reporting relies on, and are well placed to advise on practicality, cost, data limitations, monitoring design, regional context, and implications for long-term trend analysis.

National reporting will also only be useful if regional council data is interpreted in context. Regional council datasets may have been collected for different monitoring purposes, using different site networks, time periods, sampling frequencies or methods. Where this data is used in national reporting, ORC requests that relevant limitations, assumptions and caveats are clearly retained, so that regional information is not over-simplified or interpreted beyond what the data can reliably support.

ORC recognises that the Bill sits within wider government work to improve environmental data, monitoring and reporting, alongside resource management reform. ORC supports that direction.

To realise the intended efficiency benefits for councils and ratepayers, Environmental Reporting Act indicators, standards, methods and data priorities should align with proposed and future resource management reform requirements, including environmental limits, natural environment plans, regional spatial planning and system performance reporting.

This alignment should also support regional councils' existing monitoring functions, so that environmental data collected by councils can be used efficiently for both national and regional reporting purposes, without creating duplicate or inconsistent monitoring and reporting expectations.

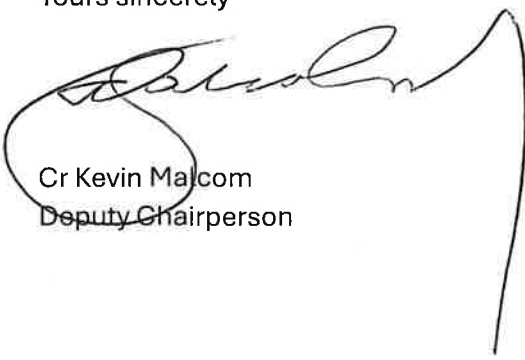
Summary of ORC's Submission requests

ORC requests that:

1. The Bill proceed, with the matters raised in this submission addressed through the Bill or its implementation framework.
2. The commentary report mechanism be used to report on emerging issues, unexpected environmental change, or matters of significant public interest between six-yearly state of environment reports.
3. Regional councils and unitary authorities be directly involved in the development of national environmental indicators, monitoring standards and methods, and data and evidence priorities reports.
4. Where regional council data is used in national reporting, relevant limitations, assumptions and caveats are retained, so that regional information is not over-simplified or interpreted beyond what the data can reliably support.
5. That any new monitoring, analysis or data requirements for councils are clearly identified and appropriately funded; and
6. Environmental Reporting Act indicators, standards, methods and data priorities are aligned with future resource management reform requirements and regional council monitoring functions, so that council data can support both national and regional reporting without duplicate or inconsistent requirements.

ORC appreciates the opportunity to provide this submission and would welcome continued engagement as the Bill progresses and implementation details are developed.

Yours sincerely



Cr Kevin Malcom
Deputy Chairperson