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Committee Secretariat
Environment Committee
Parliament Buildings
Wellington

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Dear Sir/Madam

Waikato Regional Council Submission to Environmental Reporting Amendment Bill

Thank you for the opportunity to submit on the proposed Environmental Reporting Amendment Bill. Please find attached the Waikato Regional Council's (the Council's) submission regarding this Bill. The submission was formally endorsed by the Council's Strategy and Policy Committee on **5 August 2026**.

Should you have any queries regarding the content of this document please contact Naomi Crawford, Team Leader, Policy Implementation directly on (07) 859 4637 or by email naomi.crawford@waikatoregion.govt.nz

Regards,

Tracey May
Director Science, Policy and Information

Submission from Waikato Regional Council on the Environmental Reporting Amendment Bill

Introduction

1. We appreciate the opportunity to make a submission on the Environmental Reporting Amendment Bill.
2. Waikato Regional Council (the Council) supports the overall intent of the Bill to improve environmental reporting and strengthen the evidence base for environmental decision-making and environmental stewardship. The Council agrees that environmental reporting plays an important role in increasing public understanding of environmental issues and supporting evidence-based management of natural resources.
3. The Council has a direct interest in this Bill as we are responsible for undertaking state of the environment monitoring, policy effectiveness monitoring, environmental reporting, and a range of resource management functions across freshwater, coastal, air, land, biodiversity, climate change, and natural hazard matters. These functions are carried out pursuant to the Resource Management Act 1991 (RMA) and other relevant legislation, including through the development, implementation and monitoring of the Waikato Regional Policy Statement (WRPS) and Waikato Regional Plan (WRP).
4. It is noted that the report back from the Environment Select Committee on the Planning Bill and Natural Environment Bill provides reference in imminent legislation for regional councils' continued role in environmental monitoring and reporting. Furthermore, the Council requests that implementation and transitional arrangements recognise potential future resource management reforms and ensure that environmental monitoring programmes, reporting systems, datasets and institutional knowledge can be effectively transferred to any future regional entities responsible for this function.
5. The Council considers that environmental reporting should not operate in isolation from environmental management. Environmental reporting should provide a robust evidence base that supports environmental monitoring, effectiveness evaluation, statutory planning, environmental limit setting, assessment of progress toward environmental limits, and adaptive management.
6. Regional councils play a critical role in collecting, interpreting, and applying environmental information to inform management decisions and are active providers of data. We consider that the Bill should recognise and build on the expertise, monitoring networks, and environmental management functions of regional councils to ensure reporting contributes effectively to environmental outcomes.
7. The Council generally supports the direction of the Bill but recommends several amendments to strengthen its connection to environmental management outcomes and statutory planning frameworks. The Council also recommends that implementation of the Bill align with the Natural Environment Bill, Planning Bill and future resource management system to ensure environmental reporting supports environmental limits, monitoring, plan reviews and adaptive management.

Summary

8. In summary, our submission:
 - (a) Supports the overall intent of the Bill to improve environmental reporting and strengthen the evidence base for environmental stewardship.
 - (b) Recommends strengthening the integration between environmental reporting, environmental monitoring, policy effectiveness evaluation, environmental limit setting and adaptive management.
 - (c) Recommends adopting a five-year state of the environment reporting cycle instead of the proposed six-year cycle to better align with statutory planning cycles, regional monitoring reviews and future resource management requirements.

- (d) Supports retaining "may" in proposed section 11(3) to preserve appropriate regional discretion regarding specific reporting details, while noting that the baseline obligation to report under section 8(1) remains mandatory.
 - (e) Recommends amending the purpose of environmental indicators so that they provide feedback on environmental state, change over time and effectiveness of environmental management. The Council considers that simply tracking an aspect of the environment over time is too narrow and that indicators should also support adaptive management, policy effectiveness evaluation and environmental learning.
 - (f) Supports national consistency where it improves transparency and comparability, but recommends retaining flexibility within monitoring standards and methods to support innovation, regional variability, continuity of existing monitoring programmes, and responsiveness to emerging environmental issues. Any significant changes to monitoring standards or methods should be supported by clear implementation guidance.
 - (g) Recommends that data and evidence priorities reports focus on improving environmental data, evidence, feedback and learning for environmental management, and that the Bill require those reports to consider implementation costs, local government resourcing implications, existing regional monitoring programmes, and opportunities to avoid unnecessary duplication. The Council considers that any additional obligations identified through these reports should not create unfunded mandates for regional councils.
 - (h) Recommends that any nationally identified data or evidence priorities be developed with regional councils and accompanied by clear implementation pathways, appropriate central government funding and support, and assessment of whether existing regional indicators and monitoring programmes can meet national evidence needs before new requirements are introduced. Recommends that implementation arrangements explicitly recognise regional council expertise, mātauranga Māori, Treaty settlement obligations and regional environmental variability.
 - (i) Requests involvement in future consultation regarding indicators, monitoring standards, methods and implementation of the reporting framework.
 - (j) Recommends that any new national reporting, monitoring or data collection requirements be accompanied by appropriate central government funding and implementation support.
 - (k) Supports the establishment of the Strategic Evidence Panel and recommends that its role remain focused on strategic environmental evidence, emerging trends and long-term priorities.
 - (l) Recommends clear transitional arrangements to support implementation during the transition between the current and future resource management systems.
 - (m) Recommends practical resourcing and participation mechanisms to support iwi and hapū involvement in environmental reporting and data priority setting.
 - (n) Recommends clarifying the relationship between national data priorities and regional monitoring responsibilities, including how existing regional monitoring networks and information systems contribute to national environmental reporting.
9. The Council does not wish to be heard at this time in support of its written submission to the Environmental Reporting Amendment Bill. The Council appreciates the opportunity to provide these written comments and trusts that the feedback provided will assist the Select Committee in its consideration of the Bill.

Submitter details

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Changes to the Environmental Reporting Act

Integration with environmental management and planning

1. The Council supports the Bill's extended purpose of improving environmental reporting and supporting evidence-based environmental stewardship.
2. The Council considers that environmental reporting is most valuable when it forms part of a wider feedback loop between monitoring, planning, environmental management and policy review. Environmental reporting should help identify whether environmental interventions are achieving intended outcomes and support future management responses.
3. The Council also notes the increasing role of environmental limits, environmental outcomes and effectiveness monitoring within the future resource management framework. Environmental reporting should be explicitly recognised as part of the evidence base supporting those functions.

We support the Bill's extended purpose "to support evidence-based decisions that lead to effective and enduring environmental stewardship".

We recommend that environmental reporting be explicitly recognised as a key evidence base for environmental monitoring, environmental limit setting, policy effectiveness monitoring and adaptive management.

State of the environment reporting cycle

4. The Council supports moving away from three-yearly national synthesis reporting to a longer reporting cycle. Extending the reporting timeframe may improve the ability to identify meaningful environmental trends, reduce over-reliance on short-term fluctuations, and improve the efficiency and value of environmental reporting.
5. However, the Council recommends that state of the environment reporting occur on a five-year cycle rather than the proposed six-year cycle. A five-year cycle would provide a more timely evidence base for environmental management and planning decisions while still delivering the benefits of a longer reporting period.
6. In particular, a five-year reporting cycle would better align with the proposed five-year regional state of the environment reporting cycle and would provide two reporting intervals within each ten-year statutory planning cycle. This alignment would help ensure national environmental reporting remains a timely and relevant evidence base for plan reviews, policy evaluation, adaptive management and continuous improvement.
7. Environmental reporting should support assessment of progress toward environmental outcomes, limits, targets, policy objectives and other statutory goals. A six-year reporting cycle could reduce the usefulness of national reporting if significant planning and policy reviews are required to rely on information that is already several years old.
8. The Council supports the Bill's provision allowing environmental reports to compare environmental findings against relevant policy outcomes, targets, limits and goals. However, the Council recommends that environmental indicators established under section 14A also be designed to track progress towards these measures, including any intervention thresholds where they exist. This would help identify emerging risks and trends before environmental limits are reached, support earlier management responses, and strengthen the role of environmental reporting as a tool for adaptive management.

We recommend adopting a five-year state of the environment reporting cycle instead of the proposed six-year cycle, to better align with statutory planning, monitoring and review requirements.

We recommend ensuring national environmental reporting remains a timely evidence base for environmental planning, adaptive management, plan review and environmental management decisions.

We recommend that environmental reporting and environmental indicators support assessment of progress toward environmental outcomes, targets, limits and goals, and enable early identification of emerging environmental risks.

We recommend that the Bill include clear transitional provisions to avoid duplication, uncertainty and unnecessary administrative burden during implementation of future resource management reforms.

We recommend providing guidance on how reporting obligations will interact with existing Resource Management Act monitoring and reporting requirements during the transition period.

Environmental reporting and environmental limits

9. The Council supports the 'may' framing in the bill in sections 11(3), as it ensures there is operational discretion regarding which specific details are reported back. This provides necessary flexibility to accommodate regional differences, while noting that the overarching obligation to report under section 8(1) remains mandatory.

We support 'may' in proposed sections 11(3) to preserve regional discretion on specific reporting details.

We recommend requiring state of the environment reports and commentary reports to assess performance against policy outcomes, targets, intervention values, limits and goals where relevant.

We recommend strengthening the role of environmental reporting as a key evidence base for environmental limit setting, monitoring and review.

Environmental indicators

10. The Bill proposes that environmental indicators are used to track aspects of the environment over time. The Council considers that environmental indicators should do more than simply record environmental change by measuring trends using fixed methods over time. Indicators should also help decision-makers understand whether environmental management interventions are effective and whether environmental outcomes are improving. For regional authorities implementing statutory planning and monitoring responsibilities under the RMA, indicators need to provide meaningful feedback on environmental management, not just trend information. The Council therefore considers that proposed section 14A(2) should be expanded so that indicators support adaptive management, policy effectiveness evaluation, investigation of environmental change, and environmental learning.

We recommend ensuring indicators are designed to support environmental stewardship, adaptive management and learning.

We recommend broadening the statutory purpose of environmental indicators in section 14A beyond tracking environmental change over time, to include identifying the causes of environmental change and assessing the effectiveness of environmental management responses.

Scientific monitoring standards and methods

11. The Council supports national consistency where it improves transparency, comparability and public confidence in environmental reporting. However, overly prescriptive national standards can reduce flexibility, constrain innovation, constrain responses to emerging contaminants, affect continuity of

existing datasets and reduce the ability to respond to regional circumstances. The Council notes that nationally prescribed monitoring methodologies can become outdated over time as scientific understanding and monitoring technologies evolve. For example, some prescribed air quality monitoring methods may no longer reflect contemporary monitoring practice. The Council considers that environmental monitoring methods should be provided through non-statutory guidance in order to remain fit-for-purpose and capable of adapting to new information, technologies and management challenges, rather than prescribed in legislation.

We support national consistency where it improves transparency and comparability, while recognising regional environmental variability, differing monitoring requirements, and region-specific management frameworks.

We recommend that monitoring standards and methods are provided through non-statutory guidance rather than prescribed in legislation, so that they retain sufficient flexibility to support innovation, emerging contaminants, regional variability and continuity of long-term monitoring programmes.

We recommend avoiding unnecessarily prescriptive requirements that may undermine the usefulness of existing environmental monitoring systems.

Data and evidence priorities reports

12. The Council supports the introduction of data and evidence priorities reports. These reports have the potential to improve environmental monitoring, identify evidence gaps and support future investment in environmental information systems. However, environmental management relies not only on data collection but also on understanding environmental drivers, management effectiveness and system performance. The Council considers that data and evidence priorities reports should also recognise and accommodate regional monitoring priorities necessary to support local statutory responsibilities and region-specific environmental management outcomes. The Council also considers that data and evidence priorities reports should assist in identifying nationally significant evidence gaps where improved information would materially strengthen environmental monitoring, environmental management and regulatory decision-making. This includes areas where nationally significant environmental pressures, contaminants or emerging risks are not presently well understood due to limitations in available monitoring or supporting information.
13. Given regional councils fund and maintain significant environmental monitoring programmes, national data priorities should be developed with explicit consideration of local government implementation costs, resourcing implications, existing regional indicators and opportunities to avoid duplication or share services across local government boundaries. Data priorities should therefore focus on improving environmental learning, management effectiveness and environmental outcomes rather than solely improving national consistency and coverage of indicators. This could include evidence gaps identified through independent environmental reviews and investigations where better information is required to understand environmental risks, contaminant pathways, environmental drivers, and the effectiveness of management responses. The Council also supports reporting arrangements that make effective use of existing regional monitoring networks and information systems, including approaches that promote data federation and interoperability across environmental reporting systems. National reporting frameworks should minimise duplication, support interoperability, and enable environmental information collected by regional authorities to contribute directly to national reporting outcomes where practicable.
14. The Council also considers that environmental reporting should support not only environmental monitoring and environmental limit setting, but also spatial planning and environmental management decisions. Environmental reporting frameworks should recognise the importance of spatially explicit environmental information, including catchment-scale, freshwater management unit, coastal and regional monitoring datasets. These datasets provide important context for identifying environmental

state, trends and baseline conditions, understanding cumulative effects, assessing progress toward environmental outcomes and limits, and informing future planning, investment and adaptive management decisions.

We support the introduction of data and evidence priorities reports as a mechanism for identifying environmental data, monitoring and research gaps and linking environmental reporting to future investment priorities.

We recommend requiring priorities reports to identify monitoring gaps, investigation priorities and opportunities to improve understanding of environmental drivers and management responses.

We recommend broadening the purpose of data and evidence priorities reports to include environmental feedback, learning and management effectiveness.

We recommend clarifying the relationship between national data and evidence priorities reports and regional monitoring programmes to ensure that existing monitoring remains fit for purpose and that local statutory responsibilities can continue to be effectively fulfilled.

We recommend amending proposed section 13(2) to require data and evidence priorities reports to consider implementation costs, resourcing implications for local government, use of existing regional indicators and opportunities to avoid unnecessary duplication and encourage shared services.

We recommend that national data and evidence priorities do not create additional unfunded monitoring or reporting obligations for regional councils.

We recommend that environmental reporting frameworks recognise the value of spatially explicit environmental monitoring data and support the use of state, trend and baseline information at appropriate spatial scales to inform environmental management, environmental limits, planning and adaptive management.

Integrated commentary reports

15. The Council supports the shift from fixed, six-monthly domain reporting to more flexible, annual commentary reports. Commentary reports provide an opportunity to examine emerging environmental issues across multiple domains and to better reflect the interconnected nature of environmental systems. This aligns with the Bill's objective of increasing flexibility and reducing reporting burden while still maintaining regular public reporting on environmental trends and issues. This is also important for regional environmental management, where freshwater, air, land, biodiversity, coastal, climate and natural hazard issues often interact and cannot be understood effectively in isolation.
16. The Council considers that commentary reports should be used to support integrated environmental analysis and timely management responses, while also avoiding unnecessary reporting burden on data providers. Where possible, commentary reports should draw on existing high-quality indicators, regional monitoring programmes and established datasets, rather than creating duplicative reporting expectations. Therefore, the reports should be complemented by more frequently updated indicators on the StatsNZ website. This distinguishes audited/reviewed data from live/raw data and enables users to access current information when required.

We support annual commentary reports that provide an opportunity for integrated cross-domain assessment where appropriate.

We recommend that commentary reports are designed to inform timely integrated environmental management decisions by drawing on established regional indicators and datasets where appropriate.

We recommend that commentary reporting is supported by regularly updated online indicators, so that users can access current information without creating duplicate or unnecessary reporting requirements for regional councils and other data providers.

Drivers, outlooks and uncertainty

17. The Council supports the inclusion of drivers and outlooks in environmental reporting. Understanding drivers of environmental change will improve understanding of both the causes of environmental change and the likely consequences of current trends. The Council notes that many environmental indicators are influenced by natural variability, climatic conditions, lag effects and complex ecological interactions. Reporting frameworks should appropriately acknowledge these factors. The Council also considers that outlooks should transparently communicate assumptions, confidence levels and uncertainty, particularly where projections are based on incomplete or evolving evidence.

We support inclusion of drivers and outlooks within environmental reporting.

We recommend that the Bill be amended to require transparent communication of assumptions, confidence levels and uncertainty.

We recommend ensuring reporting appropriately reflects natural variability, climate influences and lag effects.

Regional context, Mātauranga Māori and implementation

18. The Council considers that mātauranga Māori, iwi and hapū knowledge, Treaty settlement obligations and regional context are important considerations in environmental reporting, monitoring and environmental decision-making. This is particularly relevant in the Waikato region, where environmental management is strongly influenced by Treaty settlement arrangements, joint management agreements and Te Ture Whaimana o Te Awa o Waikato. Where reports include outlooks about future environmental change, those outlooks should be informed by the full range of relevant knowledge systems, statutory obligations, regional circumstances and environmental management contexts.

We recommend ensuring implementation arrangements recognise regional variability and regional council expertise.

We recommend meaningful regional council involvement in developing environmental indicators, standards, methods and data priorities reports.

We recommend that outlooks in state of the environment reports and commentary reports enable the incorporation of mātauranga Māori, iwi and hapū knowledge, local knowledge and regional environmental evidence.

Strategic Evidence Panel and Resourcing implementation arrangements

19. The Council supports practical implementation of the Bill and notes that changes to indicators, standards, methods and reporting requirements may create additional obligations for local government. Implementation should recognise existing regional investment in monitoring programmes and ensure that transition costs and implementation requirements are appropriately managed. Implementation arrangements should recognise the costs associated with any new monitoring, data collection or

reporting requirements and provide appropriate support to assist regional councils with implementation. This is particularly important where national data and evidence priorities, environmental indicators, or scientific monitoring standards and methods may require changes to existing regional monitoring systems.

20. The Council supports the establishment of the Strategic Evidence Panel. An independent Strategic Evidence Panel has the potential to strengthen the quality and credibility of environmental reporting by identifying emerging issues, evidence gaps and long-term priorities. The Council considers the Panel should maintain a strategic focus and avoid becoming involved in operational monitoring decisions, which are more appropriately addressed through existing scientific, technical and regulatory processes.

We recommend phased implementation supported by clear national guidance.

We recommend that implementation arrangements recognise existing regional monitoring networks, environmental datasets and reporting systems as significant public investments and ensure their continued use and transferability through any future resource management reforms.

We recommend that implementation arrangements recognise existing local government investment in monitoring systems and environmental reporting programmes.

We recommend that any additional monitoring, reporting or data collection requirements arising from national environmental reporting frameworks be supported by appropriate central government funding and implementation assistance.

We recommend that new or amended environmental indicators, monitoring standards, methods and data priorities are accompanied by implementation planning that identifies costs, transition requirements, funding implications and opportunities to use existing regional monitoring programmes.

We support the establishment of the Strategic Evidence Panel. We recommend that the Panel maintain