



Environment Institute
of Australia and
New Zealand Inc.

29th July 2016

To: Hon. David Parker
Labour Shadow Minister for Environment
Parliament Buildings
Wellington 6140

COMMENTS ON LABOUR PARTY DRAFT 2016 ENVIRONMENT POLICY

Contact details for this submission are:

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1. Introduction

The Environment Institute of Australia and New Zealand thanks you for providing the opportunity to comment on the Labour Party's draft environment policy. As a professional body representing environmental practitioners, it is good to be in a position to pro-actively contribute to the creation of policy rather than merely reacting to that already adopted. We hope that you will find the following comments, helpful in refining the 2014 version of the Policy.

2. General Commitments

We strongly support the three commitments bullet pointed and the sentiments expressed in the Introduction section. Specifically:

- Recognising that we cannot have a healthy economy without a healthy environment
- Focusing on renewable resources and emerging technologies to transition to a low-carbon economy
- Retention of the core principals of the RMA while improving processes and ensuring local communities have their say.

“Labour rejects the notion of balancing the economy and the environment, an equation in which the environment always loses.”

To reinforce this and we suggest that Labour makes a commitment to introducing measures that will stop the **commercialisation of the conservation estate** unless commercial concessions can

be shown to have NO adverse effect on the natural environment of the area concerned or will enhance bio-diversity and other conservation values.

Commensurate with this, Labour will need to make a commitment to fund the Department of Conservation at a level where it is able to carry out its statutory duties and is no longer dependent on commercialisation of the estate to do so.

It may be appropriate to reference the **UN Sustainable Development Goals** that NZ is now signed up to (with particular reference to the environmental goals). The NZ Government will have to implement measures to achieve these goals and measure progress. Labour's Environment Policy should acknowledge and build these in.

“Labour will urgently address issues around water quality, deal more effectively and efficiently with waste and ensure Kiwis are breathing clean air.”

We note that Labour will be issuing a separate policy on water. We presume that this will include strong provisions for independent and scientifically valid monitoring of water bodies in accordance with the report on water quality prepared by the Parliamentary Commissioner for the Environment.

EIANZ strongly supports Labour's proposed policy to ensure that *“in the pursuit of economic development, sustainability and environmental protection are paramount”*. We also support the statement that this policy be backed up by *“best practice data and robust, transparent and independent environmental reporting frameworks”*. We support this provision for all aspects of the environment but particularly in the case of water quality and biodiversity because of the severity of the current threat these pose to sustainability. Our comments on suitably qualified practitioners relates to this (see below).

Like many New Zealanders, the New Zealand Chapter of EIANZ is concerned about the continuing deterioration of New Zealand's freshwater resources and the decreased ability of New Zealanders to manage these resources in a sustainable manner for current and future generations. The EIANZ supports measures to provide further policy direction and guidance for Councils and water managers that will support the implementation of the **National Policy Statement on Freshwater Management** (NPS-FW).

EIANZ also supports the implementation of an **NES for Plantation Forestry** to encourage good practice and consistency of rules across the country. We note the need for a sound comprehensive information base upon which these standards are based. This Forestry NES needs to be integrated with the NPS – FW to ensure forestry activities comply with the standards set for freshwater.

In the case of **waste management** we wish to emphasise that the cradle-to-grave approach to waste and hazardous goods management has now been superseded by a cradle-to-cradle approach. This requires the avoidance of hazardous waste in the first place through product design that allows either recycling or the biodegrading of products/ resources at the end of their lifecycle. The goal is to replace hazardous – (usually man made substances) with non-harmful substances. Biomimicry is increasingly becoming more important.

3. A just transition to a sustainable low-carbon economy

We strongly support the statement that climate change is a big opportunity for New Zealand - creating new jobs, strengthening local economies (*and communities*) and helping us take control of our energy future.

We suggest this policy includes a statement to the effect that a low carbon economy is critical for human health and the continuance of a functioning society as well as for the natural environment and the economy.

Agriculture and the low carbon economy

We appreciate that Labour will also be producing a policy on agriculture which will presumably make reference to proposed measures to address climate change but, given its impact on the environment, the omission of agriculture from this policy on environment seems remiss. We suggest the impact of our primary industries (agriculture and forestry particularly) on the environment should be noted and proposed measures to address these be cross-referenced to the appropriate policy.

Aspects of primary industry which we believe need to be specifically addressed through government's environment policy are:

- climate change
- mono-culture forestry
- land clearance
- pollution of rivers, aquifers, estuaries and coastal waters

Tourism and the low carbon economy

As with Agriculture, we appreciate that Labour will be producing a separate policy on tourism but again we suggest that, given its impact on the environment, this topic also should be referenced in the Environment policy. For example what proposals does Labour have for off-setting the environmental costs of an industry relying on long-distance air-travel?

Leading By Example

We strongly support this sentiment. There is much that government can do within its own operations and departmental practices to show the way towards environmental sustainability and failure to do so (such as not adopting stringent sustainable land-use practices on lands held by its departments and SOEs) can undermine or discourage incentives taken by local government and community-based organisations.

We note the expressed commitment to procurement of low-emission vehicles for the government fleet. The adoption of electric vehicles would be a stronger way to “lead by example” and will encourage the development of a social climate and supportive infrastructure that will enable others to follow. Incentives to commercial companies to follow suit may also speed up the transition to fossil-fuel free vehicles.

We suggest that the Policy should make it clear that “within government” includes SOEs e.g. Landcorp.

3. Strong Minimum Protection for the Environment

Resource Management Act

EIANZ supports Labour’s policies in regard to this Legislation, specifically:

- Ensuring meaningful community participation in decision-making
- Standardising and simplifying RMA rules across different consent authorities
- Supporting local government, RMA practitioners and stakeholders (*including environmental and community groups*) to develop best practice in the use of the Act
- Investigate opportunities to better integrate processes between RMA and other legislation (*such as the EEZ legislation and LGA*)
- Mandating the EPA to audit the work of RMA consent authorities in monitoring consent conditions

We support the proposal to redirect the emphasis away from encouraging shorter hearings and limiting expensive and complex expert evidence to an increased emphasis on ensuring relevant information is available as a result of good Impact (Effects) Assessment practice undertaken by accredited experts.

Requirement for Suitably Qualified Professional Status for Practitioners

The effectiveness of the RMA as a planning and decision-making tool that promotes sustainable development, relies on the accuracy of the assessment of effects. It is therefore imperative that those undertaking the work of assessing effects in whatever environmental field – ecology, social impact, climate change, contaminated land etc. – are qualified to do so.

EIANZ recommends that the Labour Policy on Environment includes an intention to introduce a requirement that all environmental practitioners providing advice to Commissioners (e.g. under S.41) or giving evidence at Council planning hearings and before the Environment Court must be accredited by a relevant professional body as being suitably qualified to undertake the assessment of effects upon which their evidence rests.

The term “suitably qualified professional” has been adopted in several Australian jurisdictions and included in New Zealand’s Contaminated Land Act. Under that Act the process for determining “suitably qualified” is spelt out in the User’s Guide which states:

"One method for assessing whether someone is a ‘suitably qualified and experienced practitioner’ is to refer to existing professional bodies that currently certify New Zealand based environmental professionals. The requirement for being “suitably qualified and experienced” would apply to those members with demonstrated contaminated land experience. Examples of such professional bodies are:

- The Institution of Professional Engineers New Zealand (IPENZ) – see www.ipenz.org.nz
- The Certified Environmental Practitioner (CEnvP) scheme run by the Environment Institute of Australia and New Zealand (EIANZ) – see www.cenvp.org."

Thank you for the opportunity to comment at this early stage.

Yours sincerely,

A handwritten signature in black ink, reading "I. Boothroyd". The signature is written in a cursive style with a large initial "I" and a long, sweeping underline.

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President, NZ Chapter EIANZ