

To: Wellington Regional Council PO Box 11646 Wellington 6011

Submission on: Proposed Change 1 to the Regional Policy Statement for Wellington Region

Date: 14 October 2022

Submission by: DairyNZ

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Key comments

DairyNZ welcomes the opportunity to comment on Proposed Change 1 to the Greater Wellington Regional Council's Regional Policy Statement ('PC1').

DairyNZ seek the relief on provisions specified in this submission and the attached table, for the reasons provided in relation to each submission point.

DairyNZ wish to be heard in support of this submission.

DairyNZ would consider being heard in conjunction with any other similar submissions.

DairyNZ could not gain advantage in trade competition through this submission.

Introduction

DairyNZ is the industry good organisation representing New Zealand's dairy farmers. Funded by a levy on milk-solids and through government investment, we support farmers through investing in research, resource development, extension, and advocacy to ensure they lead the world in sustainable dairy farming.

The New Zealand dairy sector as a whole has committed to the Dairy Tomorrow Strategy which is focussed on the key challenges and opportunities that face the dairy sector today – and importantly, into the future. The strategy includes the following two goals to work towards protecting and nurturing the environment for future generations:

- Lead efforts to improve the health of our rivers and streams and protect and enhance biodiversity, beginning in 2018, with collaboration with other rural and urban land users, central and local government and communities on strategies and actions toward achieving swimmable waterways.
- Lead efforts on agriculture's contribution to meeting New Zealand's climate change goals through identifying and implementing strategies to reduce or offset greenhouse gas emissions from dairy farming.

DairyNZ is committed to dairy farming playing its part in transitioning to a low emissions economy alongside the rest of New Zealand and supporting the delivery of the Zero Carbon Act. We have active programmes to support farmers as they transition to lower greenhouse gas emissions. Through innovation and investment our farmers, scientists, and sector partners can ensure New Zealand dairy continues to stay a world leader, while making meaningful contributions to New Zealand's greenhouse gas mitigation targets. DairyNZ is involved in a wide range of research, investing dairy farmers' levy in climate change solutions developed through science. The Less-Methane team at DairyNZ are working on several projects to develop viable solutions that reduce methane emissions on NZ farms including; methane mitigating inhibitors, selective breeding, and forage options. We seek to foster farmer climate resilience and develop low greenhouse gas emissions farming in a manner that does not threaten food production.

General submissions

The Regional Policy Statement (RPS) is a crucial document that impacts all dairy farmers in the Greater Wellington region and as a result, the region's dairy processors, rural support services and rural communities. It is important the RPS provides a clear and appropriate framework for resource management in the region, while being cognisant of the environmental, economic, social, and cultural impacts, including the impacts on rural communities. In our view, the importance of the primary sector and rural communities to Wellington has not been given appropriate consideration. As we highlight further in this submission, this concern relates particularly to those provisions proposed relating to climate change, biodiversity and freshwater.

General decisions sought by DairyNZ

- DairyNZ oppose PC1 to the RPS in all parts relating to freshwater, biodiversity and climate change and seeks relief according to table 1.
- The proposed changes to the Regional Policy Statement should focus only on the required updates needed to implement the National Policy Statement for Urban Development that needed to be notified by August 2022.
- Changes to the Regional Policy Statement relating to freshwater, biodiversity and climate change are better suited to be included alongside the NRP Plan Change 1, 2 and 3 processes when more substantial detail can be added that provides more clarity for the community following appropriate stakeholder consultation.
- Use of the 'streamlined' Freshwater Planning Process is inappropriate for much of PC1. We encourage GWRC to review those provisions earmarked for PC1 and use the regular Schedule 1 Planning Process for those provisions that are not directly related to freshwater.
- Greater Wellington Regional Council's approaches to dealing with agricultural emissions should be considered once the outcomes of Government's pricing proposal for agricultural greenhouse gas emissions is confirmed at the end of the year. To do so beforehand risks inconsistency and unintended consequences.

Specific submission points are addressed in Table 1 of this submission

Context

Timing and scope of the changes to the RPS

While we appreciate varying requirements set by Central Government that require redrafting of regional policy settings such as for the National Policy Statement for Urban Development (NPS-UD), the RPS is addressing a number of different policy areas including climate change, freshwater and biodiversity where relevant national policy settings are still under development. Put succinctly, it is not clear what role or roles PC1 to the RPS should play in addressing these issues until these national policy settings are developed, and as a result it is not yet clear whether the provisions proposed in the RPS will meet the purpose of the Resource Management Act ('the Act') outlined at section 5(2).

DairyNZ believe the changes in this RPS that do not relate to the implementation of the NPS-UD should be delayed until national policy settings have been further developed. This delay would align well with the scheduled full review of the RPS in 2024.

Section 32 report evaluation of provisions

The lack of robust assessment of the proposed provisions relating to climate change, biodiversity and freshwater through the section 32 report is of significant concern to DairyNZ.

Section 32 of the RMA sets out the requirements for preparing and publishing evaluation reports relating to the relevant plan change, these requirements include those included below, for convenience (s32(1) and s32(2)):

1. *An evaluation report required under this Act must—*
 - a. *examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*

- b. *examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—*
 - i. *identifying other reasonably practicable options for achieving the objectives; and*
 - ii. *assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
 - iii. *summarising the reasons for deciding on the provisions; and*
 - c. *contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*
2. *An assessment under subsection (1)(b)(ii) must—*
- d. *identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—*
 - iv. *economic growth that are anticipated to be provided or reduced; and*
 - v. *employment that are anticipated to be provided or reduced; and*
 - e. *if practicable, quantify the benefits and costs referred to in paragraph (a); and*
 - f. *assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*

DairyNZ is of the strong view the s32 evaluation of PC1 does not meet these standards, including in relation to those provisions relating to proposed Objective CC.3 (and particularly proposed policies cc.5, cc.13 and cc.15). Our concerns include:

- A failure to appropriately justify why regulatory intervention in the form of PC1 are justified now, prior to national policy settings being settled (including through the assessments relating to the risks of not acting).
- A failure to appropriately assess the economic and social costs associated with specific provisions, including
 - A failure to provide any robust assessment of costs
 - An assumption that a failure to act through PC1 to the RPS right now will result in significant (but unquantified) costs, with these costs justifying action now, and to the punitive extent proposed through the specific provisions.
- A failure to distinguish between the marginal costs and benefits (those associated with the provisions specifically) against the costs and benefits associated with New Zealand's climate change response as a collective.
- A failure to recognise the significant impact to primary production and rural areas in particular.

The s32 analysis in relation to climate change, biodiversity and freshwater appears hurried. This further underscores the need to pause the PC1 processes relating to these issues, undertake the further work required to fill these significant gaps in information, and address the issues (if required through the RPS) in future plan changes.

High Court decision on the Proposed Otago Regional Policy Statement

The Resource Management Amendment Act 2020 provided an alternative, streamlined process planning pathway for any changes within a regional plan that relate to freshwater.

PC1 leans on a very wide translation of what constitutes provisions relating to freshwater when proposing use of this streamlined freshwater planning process.

Recently the High Court directed the Otago Regional Council (ORC) to identify those parts of the Otago Proposed Regional Policy Statement ('OPRPS') that relate to freshwater and directed that those parts be re-notified for public submission.

This resulted in the ORC identifying approximately 45 provisions within the OPRPS as originally notified as directly related to freshwater quality or quantity with those parts required to be re-notified for public submission.

Based on the relatively limited number and scope of provisions put forward by ORC as 'relating to freshwater' in the initially notified PORPS, it is our view that several provisions considered in PC1 as 'relating to freshwater' (and therefore eligible for the streamlined process) will not meet the applicable criteria, and considered under the standard plan change process.

As a priority DairyNZ strongly encourages GWRC to review those components of PC1 considered as 'relating to freshwater' in light of the ORC example and adapt PC1 accordingly.

Table 1 – Specific submission points and relief sought

Provision (i.e. issue, objective, policy, method, definition) and proposed amendment/s	Support/Oppose	Decision Sought (along with any consequential amendments needed to address our concerns)	Reasons
Scope of RPS Plan Change 1	Oppose	<p>Reduce scope of PC1 to the RPS to changes needed to address the NPS-UD and urban climate change related issues only.</p> <p>Postpone all other changes (freshwater, biodiversity, climate change) until at least the scheduled full review of the RPS and Regional Plan.</p>	<p>Recent direction from the High Court to Otago Regional Council, on the Proposed Otago Regional Policy Statement indicates the scope for use of the streamlined freshwater planning process is narrower than GWRC appears to consider.</p> <p>Further, DairyNZ is concerned at the significant lack of robust analysis in the s32 analysis of PC1 to the RPS, particularly in relation to climate change, freshwater and biodiversity under PC1, including a lack of assessment of the economic and social costs to primary production, rural communities and the regional economy, and a lack of assessment given to the costs and benefits of waiting for further national direction in these areas.</p> <p>DairyNZ believe a more efficient and effective process would be to postpone these changes to the RPS with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1, 2 and 3), to allow for a more robust assessment of the proposed provisions and to provide for further national direction in these areas, to enable a better-informed assessment of GWRC’s role in addressing these issues.</p>
Chapter 3.4: Fresh water			
Chapter introduction	Oppose	Delete changes and address issues through a full review of the RPS	The NPS-FM directs (at 3.2(1)) that every regional council must engage with communities and tangata

			<p>whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region. The changes in PC1 to the RPS do not provide any greater clarity or direction on how Te Mana o te Wai applies to freshwater in the region. This should be determined through consultation with the community.</p> <p>DairyNZ considers any plan change that is intended for the RPS to 'give effect to' the NPS-FM should include the other components the NPS-FM also requires of the RPS; including freshwater visions and supporting values, and related objectives and policies. An integrated process of this nature is vital for providing an informed discussion to allow the setting of clear direction for freshwater management in the region. This requires a more robust process than PC1 has provided for.</p> <p>DairyNZ believe a more effective and efficient process would be for GWRC to delay these changes to the RPS, allow for sufficient time for the active involvement of tangata whenua and appropriate engagement with communities and tangata whenua and combine the outcomes of these processes with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1,2 and 3).</p> <p>This would mean GWRC would only be required to go through the Freshwater Planning process once when making all the required changes to give effect to the NPS-FM 2020, and in our view would more appropriately give effect to the NPS-FM requirements outlined at 3.2.</p>
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Table 4	Oppose	Delete changes and address issues through a full review of the RPS	As DairyNZ believe a more effective and efficient process would be for GWRC to delay these changes to the RPS, allow for sufficient time for the active involvement of tangata whenua and appropriate engagement with communities and tangata whenua and combine the outcomes of these processes with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1,2 and 3). above
Objective 12 Inclusion of Te Mana o te Wai	Oppose	Delete changes and address issues through a full review of the RPS	DairyNZ believe a more effective and efficient process would be for GWRC to delay these changes to the RPS, allow for sufficient time for the active involvement of tangata whenua and appropriate engagement with communities and tangata whenua and combine the outcomes of these processes with the scheduled full review of the RPS in 2024 to better align with the NRP Plan Changes (1, 2 and 3).
Chapter 3.6: Indigenous ecosystems			
Chapter	Oppose	Delete changes and address issues through a full review of the RPS	Dairy NZ believes Indigenous Ecosystems chapter of the RPS should be paused to be considered in the full review of the RPS, following meaningful engagement and further understanding of the national direction from the NPS-IB which will play a crucial role in setting the direction for the Region. By delaying the introduction of the Indigenous Ecosystems chapter GWRC will remove any pre-emptive guessing as to what the finalised NPS-IB will include as well as the other national tools being introduced impacting the RPS. The NPS-IB has been worked on and released twice in 2019 and most recently June 2022. Throughout the process the agricultural sector and

			<p>others within the biodiversity collaborative stakeholder group worked to develop a way of implementing targets and workable biodiversity management opportunities.</p> <p>Between iterations there was a significant shift in direction and many submitters raised issues around criteria, scope, workability and effectiveness. As the Ministry for the Environment received a considerable amount of feedback it is most likely that changes will be made to the exposure draft. It would not be sensible at this time to attempt to “guess” what national direction will dictate for this section of the RPS.</p> <p>For such a significant shift in approach for the region, Dairy NZ does not see it sensible to pre-empt what will be released as mentioned in the S32 report, which inevitably drains resources from submitters and the council. We consider this lack of national direction, in conjunction with a lack of robust assessment of costs, hampers the effectiveness of the s32 report in informing the chapter. It is also not appropriate to introduce such decisions without due consultation with those impacted within the community.</p> <p>Dairy NZ believe that the Indigenous Ecosystems should be separated out to focus on Freshwater and chapter Indigenous Biodiversity separately to allow for the implementation of the NPS-IB and the NPS-FM respectively.</p>
<p>Objective 16 Indigenous ecosystems and habitats with significant <u>ecosystem and/or</u> biodiversity values</p>	<p>Oppose</p>	<p>Delete Objective and address the issue through a full review of the RPS or alternatively,</p>	<p>In relation to indigenous vegetation and indigenous habitats, the wording as proposed goes beyond that required under S6 of the RMA which requires (emphasis ours) “The protection of areas of significant indigenous</p>

<p>are maintained protected, enhanced, and restored to a healthy functioning state.</p>		<p>Amend Objective 16 as follows (or words to similar effect)</p> <p><u>Significant</u> Indigenous ecosystems and habitats with significant ecosystem and/or biodiversity values are maintained protected, enhanced, and restored to a healthy functioning state.</p>	<p>vegetation and significant habitats of indigenous fauna are of national importance”.</p> <p>Regional Plans, District Plans and other lower level planning documents that are required to ‘give effect to’ the GWRC RPS are more appropriate avenues for considering where and whether to extend these protections beyond areas of significance.</p> <p>The NPS-FM does provide direction in relation to indigenous ecosystems than directed in the RMA. However, as with the majority of freshwater related provisions in PC1 we believe amendments aimed at giving effect to the NPS-FM should be considered together.</p>
<p>Objective 16A The region’s indigenous ecosystems are maintained, enhanced, and restored to a healthy functioning state, increasing their resilience to increasing environmental pressures, and giving effect to Te Rito o te Harakeke.</p>	<p>Oppose</p>	<p>Delete Objective and address the issue through a full review of the RPS or alternatively,</p> <p>Amend Objective 16A (or words to similar effect):</p> <p>The region’s indigenous <u>ecosystems are</u> maintained, enhanced, and restored to a healthy functioning state, improving their resilience to increasing environmental pressures, particularly climate change, and giving effect to Te Rito o te Harakeke.</p>	<p>Dairy NZ supports an objective to improve the current state of the regions ecosystem which aligns with the <i>Dairy Tomorrow</i> strategy. We are however concerned with the objective’s wording and the use of “restoring to a healthy functioning state” which in our view has not been defined and will depend on the outcome of the freshwater plan change process.</p> <p>We would support consideration of a focus on significant indigenous biodiversity and habitats as required at s6 of the RMA through amendments to Objective 16 (as above) with a broader focus on s7 matters through an appropriate rewording of this Objective.</p>
<p>Objective 16C Landowner and community values in relation to indigenous biodiversity are recognised and</p>	<p>Oppose</p>	<p>Delete Objective and address the issue through a full review of the RPS or alternatively,</p>	<p>While we support the intention to recognise and support landowners, as with the other objectives relating to biodiversity we believe an objective of this</p>

<p>provided for and their roles as stewards are supported.</p>		<p>Amended objective 16C as follows (or words to similar effect):</p> <p>Landowner and community values in relation to indigenous biodiversity are recognised and provided for. <u>Landowners are engaged with, recognised and their roles as stewards are supported.</u></p>	<p>nature should be considered through a full review of the RPS.</p> <p>We are also concerned at the use of the word ‘steward’. This infers a responsibility of landowners to deliver ‘community values’ with no clarity around what this may mean in a practical sense.</p> <p>Dairy farmers hold a significant amount of land and therefore indigenous ecosystems, GWRC needs to ensure that the RPS provides opportunity for farming to continue as a viable operation while working with farmers. The wording of this objective should reflect this intent, without unduly inferring a responsibility on farmers as solely responsible for delivering on community values.</p>
<p>Chapter 3.1A: Climate Change</p>			
<p>Objective CC.1 By 2050, the Wellington Region is a low-emission and climate-resilient region, where climate change mitigation and adaptation are an integral part of:</p> <ul style="list-style-type: none"> (a) sustainable air, land, freshwater, and coastal management, (b) well-functioning urban environments and rural areas, and (c) well-planned infrastructure. 	<p>Oppose</p>	<p>Delete Objective and any related provisions or methods and address the issue through a full review of the RPS.</p>	<p>DairyNZ believe the analysis included in the section 32 report to support this policy position is inadequate to determine the appropriateness of the policy settings, costs or benefits of this approach. Further analysis needed to ensure this objective is consistent with the latest science and will achieve community objectives.</p>
<p>Objective CC.2 The costs and benefits of transitioning to a low-emission and climate-resilient region are shared fairly to achieve social, cultural, and economic well-being across our communities.</p>	<p>Oppose</p>	<p>Delete Objective and any related provisions or methods and address the issue through a full review of the RPS.</p>	<p>DairyNZ believe the analysis included in the section 32 report to support this policy position is inadequate to determine the appropriateness of the policy settings, costs and benefits of this approach. Further analysis</p>

			needed to ensure this objective is consistent with the latest science and will achieve community objectives.
<p>Objective CC.3 To support the global goal of limiting warming to 1.5 degrees Celsius, net greenhouse gas emissions from transport, agriculture, stationary energy, waste, and industry in the Wellington Region are reduced: (a) By 2030, to contribute to a 50 percent reduction in net greenhouse gas emissions from 2019 levels, including a: (i) 35 percent reduction from 2018 levels in land transport -generated greenhouse gas emissions, and (ii) 40 percent increase in active travel and public transport mode share from 2018 levels, and (iii) 60 percent reduction in public transport emissions, from 2018 levels, and (b) By 2050, to achieve net-zero emissions.</p>	Oppose	<p>Delete Objective and any related provisions or methods and address the issue through a full review of the RPS.</p> <p>Undertake adequate analysis (within the Section 32 report) to determine an appropriate target with consideration of the implementation, costs and impact.</p>	<p>DairyNZ believe the analysis included in the section 32 report to support this policy position is inadequate to determine the costs or benefits of this approach.</p> <p>The analysis contradicts the most recent science on split-gas targets from IPCC AR6 report.</p> <p>The analysis uses IPCC global shared socioeconomic pathways to set regional emission reduction targets. IPCC has advised that these pathways are not appropriate for setting domestic policy. ¹</p> <p>The analysis does not adequately outline the costs of implementation on affected parties. The economic analysis of implementation is based on avoided cost of emissions and does not consider cost of abatement. The underlying assumptions of the analysis are inconsistent with the realities the region are facing.</p>
<p>Objective CC.4 Nature-based solutions are an integral part of climate change mitigation and adaptation, improving the health and resilience of people, biodiversity, and the natural environment.</p>	Oppose	Delete Objective and any related provisions or methods and address the issue through a full review of the RPS.	DairyNZ believe the analysis included in the section 32 report to support this policy position is inadequate to determine the appropriateness of the policy settings, costs or benefits of this approach. Further analysis needed to ensure this objective is consistent with the latest science and will achieve community objectives.

¹ [These pathways illustrate relative global differences in mitigation strategies, but do not represent central estimates, national strategies, and do not indicate requirements. - Global Warming of 1.5 °C — \(ipcc.ch\)](https://www.ipcc.ch)

<p>Objective CC.6 Resource management and adaptation planning increase the resilience of communities and the natural environment to the short, medium, and long-term effects of climate change.</p>	<p>Oppose</p>	<p>Delete Objective and any related provisions or methods and address the issue through a full review of the RPS.</p>	<p>DairyNZ believe the analysis included in the section 32 report to support this policy position is inadequate to determine the appropriateness of the policy settings, costs or benefits of this approach. Further analysis needed to ensure this objective is consistent with the latest science and will achieve community objectives.</p>
<p>Objective CC.7 People and businesses understand what climate change means for their future and are actively involved in planning and implementing appropriate mitigation and adaptation responses.</p>	<p>Oppose</p>	<p>Delete Objective and any related provisions or methods and address the issue through a full review of the RPS.</p>	<p>DairyNZ believe the analysis included in the section 32 report to support this policy position is inadequate to determine the appropriateness of the policy settings, costs or benefits of this approach. Further analysis needed to ensure this objective is consistent with the latest science and will achieve community objectives.</p>
<p>Chapter 4.1: Regulatory policies – direction to district and regional plans and the Regional Land Transport Plan Strategy</p>			
<p>Policy CC.5: Avoiding increases in agricultural greenhouse gas emissions – regional plans</p>	<p>Oppose</p>	<p>Delete Policy and address the issue through a full review of the RPS.</p>	<p>Whilst DairyNZ support the intent to reduce agricultural emissions we are concerned about the inconsistencies and duplication of the work underway through the He Waka Eke Noa partnership and the Governments pricing proposal for agricultural greenhouse gas emissions.</p> <p>The government are still actively considering an alternative pricing mechanism proposed by the He Waka Eke Noa partnership and will make a decision on how agriculture emissions are priced by December 2022. The Government partnered with the primary sector and iwi/Māori to equip farmers to measure, manage and reduce their on-farm agricultural greenhouse gas emissions and adapt to climate change. This includes collaboration on the detailed development of an appropriate on-farm emissions pricing mechanism, which will come into effect in 2025.</p>

			<p>Developing a regionalised approach to a national issue will lead to misalignment with national policies and instruments, confusion at local level, misallocation of resources and unintended consequences.</p> <p>As already outlined in this submission, we have significant concerns at the level of analysis provided for in the section 32 report accompanying the plan change. In our view the s32 analysis is insufficient to justify the types and extent of the changes proposed.</p> <p>The primary sector is already committed to addressing agricultural emissions at a national level. Through the He Waka Eke Noa programme DairyNZ and partners engaged with farmers over six weeks, through a series of in-person sessions and online webinars and gathered feedback through an online survey and a number of emails from farmers and others. This process involved education and outreach to farmers and rural communities to understand the drivers, challenges and opportunities to address agricultural emissions. It would work best for GWRC to build upon the momentum of this work instead of creating an additional approach which will complicate farmers ability to act.</p> <p>The uncertainty for farmers and the potential issue of fairness between regions will outweigh any benefits of attempting to progress faster than the national approach that is well underway.</p> <p>We advocate for national guidance to help councils navigate this issue.</p>
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			Another concern is around the issue of emissions leakage. New Zealand currently has the lowest carbon footprint for milk in the world ² . Our focus as a sector is to produce the most sustainable milk. Any shift in production offshore due to domestic and regional policy setting would lead to an increase in global greenhouse gas emissions due to other producers being less efficient.
Chapter 4.2: Regulatory policies – matters to be considered			
Policy CC.13 Managing agricultural gross greenhouse gas emissions – considerations	Oppose	Delete Policy and address the issue through a full review of the RPS.	<p>DairyNZ acknowledges the changes to the RMA that come into effect in November 2022 which give councils the ability to consider greenhouse gas emissions within the consenting process.</p> <p>The s32 report fails to appropriately justify why regulatory intervention in the form proposed is justified, the economic and social impacts of that intervention, or whether the costs associated with the policy will outweigh the benefits from the regulation.</p> <p>DairyNZ also highlight that the National Environment Standards for Freshwater require any intensification of land use over 10ha to gain a resource consent. Greenhouse gases could form a part of the considerations for consents triggered by this rule. However due to the lack of detail on how the assessment in a consenting process will be undertaken DairyNZ is concerned this policy will result in unattended consequences and inconsistency with the national approach to reduce agricultural greenhouse gases. It is unclear what information will be accepted by</p>

² Mazzetto, A., Falconer, S., Ledgard, S. (2021), Mapping the carbon footprint of milk for dairy cows. AgResearch.

			<p>council for consents and what granularity of greenhouse gases emissions changes will be impacted.</p> <p>Further work needs to be done to outline the details of how this policy will be implemented including the impact on farmers and what information will be accepted by councils in the consenting process.</p> <p>DairyNZ are also concerned that this policy only focuses on penalising increases and not rewarding reductions which farmers may implement for their own motivations. DairyNZ would like to see this policy being used as a carrot not just a stick.</p>
Policy 44: Managing water take and use to give effect to Te Mana o te Wai	Oppose	Delete policy and address the issue through a full review of the RPS.	Delay inclusion of the changes of this until all of the NPS-FM can be implemented into the full RPS review. This will allow for further clarity about what Te Mana o te Wai will mean at a regional level as well as the outcomes of the Water Allocation Review in Method 48 to be considered.
Policy 56: Managing development in rural areas – consideration	Support in part	Update to be in line with National Policy Statement on Highly Productive Land	Review policy and make required changes for consistency with National Direction.
Chapter 4.4 Non-regulatory policies			
Policy FW.7: Water attenuation and retention – non-regulatory	Support in part	Delete policy and address the issue through a full review of the RPS.	<p>Water availability will continue to be a pressing issue for the Greater Wellington region due to both the regulatory implications of implementing Te Mana o te Wai and the increasing pressures of Climate Change.</p> <p>DairyNZ agree with this policy and would like to see from the council an ambitious and collaborative approach to investing and developing a diverse portfolio of nature based and constructed solutions to water</p>

			<p>storage in the region. This works could begin prior to any further regulatory changes.</p> <p>Water availability is crucial to most land uses and reliable access to water will create flexible for farmers and the wider community to adapt to climate change.</p>
Chapter 4.5: Methods to implement policies			
Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Oppose	Delete the method and address the issue through a full review of the RPS.	<p>As with other provisions relating to agricultural greenhouse gas emissions, DairyNZ opposes this method outright for inclusion through PC1.</p> <p>As outlined in this submission, there are already existing efforts underway to reduce agricultural greenhouse gas emissions. Deferral of this consideration until the full RPS review will enable alignment with the Primary Sector Climate Action Partnership between Government, the Primary Sector, and iwi/Māori - He Waka Eke Noa (HWEN).</p> <p>Through the full RPS review GWRC will be able to leverage its existing rural networks, databases and environmental expertise that support change and improved management practices at a farm level to achieve GWRC'S ambitious approach to climate change mitigation.</p>
Method CC.8 Programme to support low-emissions and climate-resilient agriculture	Support in part	Delete the method and address the issue through a full review of the RPS.	<p>As above, DairyNZ supports deferral of the provisions relating to climate change until a full review of the RPS is undertaken.</p> <p>However, as a second preference, we appreciate a non-regulatory approach may enable GWRC to build</p>

			relationships with and provide information to farmers in a way that will assist moving farmers towards the common goal of lower agricultural emissions, in a way that does not include the same costs and risks as the regulatory approaches GWRC is signalling through PC1.
Method 48: Water allocation policy review	Oppose in part	Delete the method and address the issue through a full review of the RPS.	<p>Water availability will continue to be a pressing issue for the Greater Wellington region due to both the regulatory implications of implementing Te Mana o te Wai and the increasing pressures of Climate Change.</p> <p>DairyNZ would like to see from the council an ambitious and collaborative approach to investing and developing a diverse portfolio of nature based and constructed solutions to water storage in the region. This works could begin prior to any further regulatory changes.</p> <p>Water availability is crucial to most land uses and reliable access to water will create flexible for farmers and the wider community to adapt to climate change.</p> <p>These issues should be a key priority to be addressed in the review. This work should align with the review of the NRP in 2023/2024.</p>

