

BEFORE THE HEARING PANEL

UNDER THE Resource Management Act 1991 (**Act**)
IN THE MATTER OF Proposed Change 1 to the Wellington Regional
Council's Regional Policy Statement (**PC1**)
BETWEEN **WELLINGTON REGIONAL COUNCIL**
Local Authority
AND **WAIRARAPA FEDERATED FARMERS**
Submitter 163 to PC1

**HEARING STREAM THREE
HEARING STATEMENT OF ELIZABETH MCGRUDDY ON BEHALF OF
WAIRARAPA FEDERATED FARMERS**

14 AUGUST 2023

INTRODUCTION

1. Wairarapa Federated Farmers (**WFF**) made a submission on Proposed Change 1 (**PC1**) to the Wellington Regional Policy Statement (**RPS**).
2. The purpose of this hearing statement is to summarise Federated Farmers' submission in respect of Hearing Stream 3 (**HS3**) and in respect of the following matters:
 - (a) General matters:
 - The matters set down for the Freshwater Plan Process (FPP)
 - WFF Primary Relief
 - Statutory Framework
 - S32 Analysis
 - PC1 Engagement
 - (b) Climate Mitigation and Adaptation matters
 - Regional GHG Inventory and Proposed Targets
 - Sequestration
 - Mitigation - Commercial Leadership
 - Adaptation – Rural Water Resilience
 - (c) Matters raised in s42A Reports
 - Climate Change – General
 - Agriculture
 - Climate Resilience and Nature Based Solutions
 - Energy, Waste and Industry
 - Natural Hazards
 - Transport

SUMMARY

3. Federated Farmers has a long history of engaging in climate policy – mitigation and adaptation – both domestically and internationally. In the global context, New Zealand is almost unique in generating most of its electricity from renewable sources, and in being dependent on a livestock based agriculture sector for much of its export revenue, presenting unique challenges and opportunities for New Zealand in contributing to global efforts.
4. Federated Farmers support the need to reduce long-lived gases (CO₂) to net zero by 2050. We support the need to reduce short-lived gases (methane) so the effect on global temperatures is warming neutral. We accept that this means reducing the emissions footprint from farming, while still safeguarding food security, consistent with the 2015 Paris Agreement.
5. New Zealand farmers are currently among the most emissions efficient producers in the world; they are acutely tuned to consumer signals; and very aware of climate risks to their businesses. Individually and collectively through our processor companies and industry good bodies, New Zealand farmers are playing their part in transitioning to a low emissions economy and supporting delivery of the Climate Change Response Act.
6. The Climate Change Response Act is intended to provide clear and stable climate change settings, not least to provide for business and investment certainty. In respect of agricultural methane (recognising the different warming potential), it sets targets for 10% methane reductions by 2030 (24-47% by 2050), to be achieved through a multi-faceted programme of market-based instruments and government/industry partnerships.
7. In this context, WFF record significant concern that Council seek to de-stabilise both the national methane targets and the mechanisms for achieving them in this region.
8. WFF cannot support the proposed approach for methane targets (>50% reduction by 2030, and net zero by 2050); and cannot support regulating farmers through RMA consents to achieve those targets.
9. WFF seek to work alongside Council to support and enable the engagement and innovation of our region's farmers and to enable commercial leadership in climate change solutions. RPS Change One is not the tool to achieve that.

GENERAL MATTERS

FRESHWATER PLAN PROCESS

10. WFF relief (WFF 2.2) sought that the FPP should not apply to any of the provisions in proposed Chapter 3.1A Climate Change.
11. WFF agree - and disagree – with the s42A recommendations as follows:
 - General (para 59, 60): WFF agree that these provisions are principally about climate change and should be Schedule One
 - Agriculture (para 48, 49): WFF agree that these provisions are principally about climate change and should be Schedule One
 - Energy, Waste and Industry (para 58, 59): WFF agree that these provisions should be Schedule One for the reasons set out
 - Natural Hazards (para 68, 69, 153): WFF does not agree that these provisions should be FPP
 - Climate Resilience (para 62, 63, 203): WFF does not agree that these provisions should be FPP
12. Whereas the first three reports acknowledge references and relationships to water, but assess the provisions overall as being wider and/or more directed to other topics; the second two reports appear to rely on references and relationships to water as sufficient to warrant them being FPP. WFF endorse the former approach and does not agree with the latter approach.

FFNZ PRIMARY RELIEF

13. WFF relief seeks generally that the scope of PC1 be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development; and specifically that the proposed insertion of Chapter 3.1A be deleted and considered in the full review of the RPS scheduled in 2024 (WFF submission point 2.1).
14. WFF reasons are set out in the original submission (WFF 2.3) including that:
 - The statutory basis for notification had not been set out

- National direction from MfE to Councils was anticipated against the risk of ad hoc decision-making, and to ensure the regional contribution is focussed where it is most valuable and appropriate
 - Central Government is leading a substantial work programme, with consultation in process on major climate-related work streams
 - The primary sector is working alongside government at the national level on a multi-pronged approach to reducing agricultural emissions
 - Council is working (with the Wellington Regional Leadership Committee) to develop a Regional Emissions Reduction Strategy and Adaptation Strategy
15. For all these reasons, WFF submitted that the full review of the RPS scheduled in 2024 would be the appropriate time to consider regional climate change provisions, informed by the national and regional workstreams outlined above.
16. Subsequently, the Panels sought clarification from Council as to the extent review of the RPS was still contemplated. The Council responses (HS1 Right of Reply 7 July and HS2 Right of Reply 28 July) confirm that RPS reviews are contemplated for multiple topics (water, coastal, tangata whenua, historic heritage, mineral resources); that a further change will be notified in late 2024; and that Council is required to commence full review of the RPS prior to 30 September 2024.
17. In this context, WFF reiterate its primary relief, ie, withdraw the proposed insertion of Chapter 3.1A and instead focus the collective resources of Council and community in the upcoming period on progressing the Regional Emissions Reduction and Adaptation Strategies; then re-look at climate change in the planned upcoming RPS reviews, better informed by these regional initiatives, and better informed by national settings (which are currently still in process).
18. To the extent that the proposed insertion of Chapter 3.1A is progressed, WFF proposes alternate relief on specific provisions below.

STATUTORY FRAMEWORK

19. Council does not present one coherent assessment of the statutory framework, instead relying on the various s42A reports to set it out, including:

- Transport (para 35, our emphasis): “*The RMAA received assent in June 2020 and the parts most relevant to this topic came into effect on 30 November 2022. Schedule 12, clause 26, of the RMA sets out the transitional effect of the climate change amendments, which is that **Change One is to be determined as if those amendments had not been made***”¹
- Agriculture (para 29, our emphasis): “*The s32 report provides a detailed assessment of relevant national direction that Change One seeks to give effect to. This is also summarised in the CC-General s42A report so is not repeated here. Both these reports note that there **is currently an absence of specific RMA national direction on climate change mitigation to give effect to***”
- Agriculture (para 63, our emphasis): “*Policy CC.5 provides new and potentially **unprecedented direction to manage agricultural GHG emissions under the RMA***”

20. WFF submit that these statements do not represent a firm statutory basis for the climate change proposals advanced in PC1, including and especially for agriculture.

21. To the extent there are higher order statutory documents in respect of other sectors, WFF note the following recommendations in the s42 reports:

- Transport (para 174, 185, our emphasis): recommending that Policy CC1 in respect of reducing transport emissions be amended to exclude aircraft emissions on the basis that **national decisions are still pending under the CCRA**
- Energy, Waste and Industry (para 36, 101, footnote 11, our emphasis): noting that **changes are proposed to the existing NPS-Renewable Electricity Generation, and that these will be directly inserted into Regional Policy Statements**; but nevertheless recommending that these proposed changes be included in PC1, notwithstanding that it is not certain that these amendments will be gazetted
- Energy, Waste and Industry (para 5, 77-83, our emphasis): recommending deletion of Policy 2 in respect of reducing emissions from industry on the basis these have been **superceded by national direction subsequent to notification of Change One**, noting that

¹ See also Council Legal Submission, HS1, 8 June 2023, para 14

this would mean there would be no regulatory policies directing industry to contribute to the proposed emissions reduction targets, and suggesting that **support for industry would likely best be delivered through non-regulatory support, which does not warrant specific changes to the Natural Resources Plan**

- Energy, Waste and Industry (para 165, our emphasis): recommending rejection of submissions to make Policy 65 in respect of waste more directive on the basis that there is **no evidence to demonstrate a regulatory approach would be more efficient and effective**

22. WFF submit that these examples serve to highlight that multiple climate change workstreams are proceeding apace at the national level; and proper consideration of the extent to which Council can “complement” and not duplicate or conflict with national direction, would more properly be considered in the scheduled upcoming reviews of the RPS when national settings have settled.

23. WFF further submit that Council have not tabled any evidence to demonstrate the efficiency and effectiveness of a regulatory approach as proposed for the agriculture sector (returned to below in respect of s32 analysis).

24. Related to this point: consequent to the changes to the RMA made in November 2022 after notification of PC1 – and against the risk of councils proceeding in an uncoordinated and ill-directed manner – MfE published guidance² for councils, noting:

- *From 30 November 2022, it becomes a legal requirement for local government to ‘have regard to’ the national adaptation plan and the emissions reduction plan when preparing or changing Resource Management Act 1991 (RMA) regional policy statements, regional plans, and district plans.*
- *This requirement is to ensure that planning nationwide is in line with New Zealand’s long-term climate strategies and goals. This guidance note gives more information on how local government might ‘have regard to’ the national adaptation plan and the emissions reduction plan when developing or changing plans under the RMA.*

² <https://environment.govt.nz/assets/publications/national-adaptation-plan-and-emissions-reduction-plan-guidance-note.pdf>

25. The MfE Guidance Note describes how RMA plans can support the National Emissions Reduction Plan (NERP) – for the agriculture sector, MPI is lead agency, and MfE advises RMA plans can support the NERP by:
- *Support enabling adoption of mitigation technologies in farm practices*
 - *Support farm planning*
 - *Support enabling rural digital connectivity*
26. WFF endorse the focus on “supporting and enabling”. WFF submit that is not the intent of PC1 in respect of agricultural emissions. To the extent PC1 refers to non-regulatory methods for agriculture, WFF agree that – as for industry – non-regulatory support does not warrant specific changes to the Natural Resources Plan.
27. In summary:
- WFF do not agree the statutory basis for PC1 as set out by Council is sufficiently robust to support the proposals advanced in Chapter 3.1A and that it should be withdrawn
 - To the extent PC1 is required to have regard to - and to “complement” - the NERP and NAP, WFF submit that – to the contrary – PC1 duplicates and conflicts with those documents.
 - To the extent Chapter 3.1A is retained, WFF submit that Objective CC3 should be amended to remove Agriculture

SECTION 32 ANALYSIS

28. WFF submitted (para 15, 2.7) that, on its reading, the intention and effect of PC1 impacts most profoundly on the agriculture sector, but that the ramifications for the primary sector and the wider regional economy are not discussed. Instead, the proposed regional targets are not accompanied by any coherent and costed strategy for achieving them, and any economic analysis is restricted to a brief internal memorandum dated just prior to notification.
29. The s42 reports (CC General, para 69, 70) confirm that the proposed targets and consequential provisions are not supported by robust cost-benefit analysis because “*it is not practicable to undertake detailed cost-benefit analysis*”. Instead, Council propose that robust analysis will be undertaken in future plan

changes. WFF reiterate that this is an unsatisfactory basis for proposing binding statutory targets.

30. WFF note that the Climate Change Response Act (section 5ZC)³ directs the Climate Change Commission to, inter alia, consider the following matters:
- *have particular regard to how the emissions budget and 2050 target may realistically be met*
 - *the need for emissions budgets that are ambitious but likely to be technically and economically achievable*
 - *the likely impact of actions taken and the distribution of those impacts across the regions and communities of New Zealand*
 - *the implications, or potential implications, of land-use change for communities*
31. In respect of PC1, WFF submit that Council has granted itself licence to propose targets unfettered by any of the disciplines which apply at the national level.
32. In respect of deferring consideration of climate change to the scheduled upcoming reviews of the RPS, the S42 report (CC General, para 67) recommends rejecting this, suggesting it would “*significantly increase the challenges and costs of climate change mitigation and adaptation in the region*”. With respect, the RPS review is scheduled to commence in late 2024, ie, the timeframe for assessing the scale of any additional costs is limited, and it is not the case that action is not proceeding across all sectors currently (with or without PC1).
33. Related to this point, the s32 analysis of the base case (status quo) could and should have specifically assessed the efficiency and effectiveness of progressing climate change considerations in the scheduled RPS review.
34. In summary:
- Chapter 3.1A objectives have not been subject to robust cost-benefit analysis

³ <http://www.legislation.govt.nz/act/public/2019/0061/latest/LMS183736.html>

- Council have not tabled any evidence to demonstrate the efficiency and effectiveness of the proposed regulatory approach for Agriculture
- Council have not undertaken analysis of the costs and benefits of deferring consideration of climate change provisions to scheduled upcoming RPS reviews

PC1 ENGAGEMENT

35. The WFF submission (WFF 2.6) recorded that the Climate Change Commission has set out preconditions for an equitable transition strategy, ie, that it must be well-paced, well-planned, well-signalled and co-designed.
36. These conditions have not been met in respect of PC1: to the contrary, the s32 report makes clear the process was rushed, consultation was restricted to the statutory minimum, and WFF was not consulted notwithstanding that PC1 attempts to “reset” the region for the coming decade and out to 2050, with profound implications for the farming sector.
37. Instead, Council propose that engagement be undertaken only after the policy direction and targets have been locked in (s42 Agriculture, para 70, 74, 102, 125, 128, 211, our emphasis):
- *“A reduction in agricultural emissions is necessary to achieve Objective CC3 – the key questions are what level of reduction is needed, when and how this is best achieved. **These are complex questions which will require detailed policy work and ongoing conversations with all relevant stakeholders to develop fair, equitable and cost-effective regional policy that complements national policy**”*
 - *“The approach to manage agricultural GHG emissions by Council is best addressed in a more comprehensive manner through the future regional plan change. **This will enable these issues, options, benefits and costs to be considered in a much more detailed way**”*
 - *“It would be more effective for Method CC.5 to focus on undertaking the necessary technical and policy work and stakeholder engagement to inform the regional plan change. I expect this work would include a **more detailed review of GHG emissions from rural landuse in the region, an evaluation of regulatory and non-regulatory methods**”*

to reduce GHG emissions, stakeholder engagement, and identification of ways to best complement national policy and initiatives”

- *“By the time Policy CC5 is implemented through a future plan change, it is expected that the **national approach to agricultural greenhouse gas emissions will be adopted by central government**, which will enable the regional plan provisions to be aligned and ensure there is not un-necessary associated compliance costs”*
- *‘I do not recommend that Method CC.5 is amended to apply to all sectors....I recommend it be amended to focus on Policy CC.5 Agriculture....**recognising the extensive work and engagement that needs to be undertaken to confirm the most effective and efficient approach”***

38. WFF reject the premise that the “*extensive work and engagement*” required is in fact not required in respect of setting “regional directions”, but only in respect of the details of implementation after the direction and targets have been set.

39. By contrast with the cavalier approach for Agriculture (kicking the can down the road on proper engagement), Council evidence (Technical Evidence – Roos, para 77, 78, our emphasis) makes clear that a different approach was adopted in respect of Transport targets:

- Objective CC.3 sets numeric targets for the transport sector “as **calculations to establish these had already been prepared as part of the Regional Land Transport Plan**”⁴
- *“The Regional Land Transport Plan and Regional Public Transport Plan are currently being reviewed, including a review of the sufficiency of the GHG and mode-shift targets. It is my understanding that **if these plans adopt new targets, then a process will be considered to review the targets in Change One**”*

40. The s42 report (Transport, para 46-49) clarifies the statutory basis for the RLTP, ie, that it is prepared under the Land Transport Management Act 2003 which provides the legal framework for managing and funding land transport;

⁴<https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwjNgLzXhM6AAxWegVYBHTAIBC8QFnoECCIQAQ&url=https%3A%2F%2Fwww.gw.govt.nz%2Fassets%2FDocuments%2F2021%2F10%2FWellington-Regional-Land-Transport-Plan-2021web.pdf&usq=AOvVaw1p6H10Si6wVR-U6k6DP0WC&opi=89978449>

supported by the Government Policy Statement on Land Transport which provides guidance on investment priorities:

- These investment priorities include a specific focus on reducing GHG emissions: “*We have to crack this nut if we are going to meet our target of net-zero carbon by 2050...Our challenge is to accelerate the transition at an acceptable cost*”⁵

41. Key points arising in respect of transport targets (WFF 2.7):

- They have been developed via the comprehensive process and engagement associated with the development of the RLTP
- The targets are already ‘locked in’ via another statutory process
- To the extent those targets are reviewed via that other statutory process, then the PC1 transport targets may be amended to follow suit
- Transport targets are informed by cost considerations, and achievement of those targets is critically contingent on central government investment priorities set in the GPS-Land Transport (currently under review for the upcoming decade commencing 2024)

42. For clarity: the transport targets in PC1 are not driven by “*a political decision by Council to take an ambitious approach*” (s42, CC General, para 204): instead, they merely copy and paste targets set under another statutory process. WFF submit that this raises a very large question as to the rationale for – and the efficiency and effectiveness of - setting transport targets in PC1 (WFF 2.7). Council evidence does not address this point other than to offer an opinion that they would be useful (Roos, para 78).⁶

43. The level of ambition (35% reduction by 2030⁷) is especially curious in the context that Transport is the largest source of emissions in the region; and in the context of Council advice to the Climate Commission (WFF 2.7):

- Recommending “*going hard and fast on road transport*”; and that
- “*This will create a buffer to more carefully transition the land sector*”

⁵ <https://www.transport.govt.nz/area-of-interest/strategy-and-direction/government-policy-statement-on-land-transport/>

⁶ The s32 report (page 246) makes reference to a High Court decision in respect of Auckland Transport – addressed in the WFF submission at 2.7

⁷ The targets for active travel and public transport are subsidiary to the overall 35% target and not additional (WFF 2.7)

44. In respect of other sectors, Council evidence (Roos, para 77, our emphasis) goes on to state: “**Targets for other sectors are intended to be developed as part of the Emissions Reduction Plan and it is my understanding that these may be incorporated into the RPS later**”.
45. Turning then to the Regional Emissions Reduction Strategy (referenced at WFF 2.7), this plan is being developed under the Wellington Regional Leadership Committee (GWRC, TAs, Iwi and Ministries) to:
- *Develop a strategic approach to transition to a zero-carbon region that meets community needs and aspirations*
 - *Develop an emissions reduction plan, including scenario and options analysis*
 - *Identify the key shifts and priority actions that need to happen at a regional level to reduce carbon emissions.*
46. The project brief emphasises that “*All voices in the region are important when planning how we reduce carbon emissions in a targeted way – including government, iwi, sector specialists, rangatahi and community groups*”. WFF agree and is currently engaging with this process.
47. In this context, WFF submit that PC1 is putting the cart before the horse; and that RPS climate change provisions would more properly be considered in the scheduled upcoming RPS review, informed by the Regional Emissions Reduction and Adaptation Strategies which are currently in process.
48. In summary:
- WFF submit that the Chapter 3.1A climate change proposals have not been well-paced, well-planned, well-signalled and co-designed as recommended by the Climate Change Commission
 - The Transport targets derive from other legislation; and have simply been copied into Chapter 3.1A

CLIMATE MITIGATION AND ADAPTATION

REGIONAL GHG INVENTORY AND PROPOSED TARGETS

49. In respect of GHG inventories, WFF note that national inventories are not easily down-sized to regional; and that a number of regions and districts – including Council - have instead commissioned consultants to prepare inventories at that scale. WFF is not clear on the extent to which the Wellington Regional Inventory is aligned with protocols and methodologies employed in the National Inventory.
50. In respect of GHG targets, the proposed regional target for CO₂ is consistent with the CCRA, and the proposed regional target for methane is not.
51. Importantly, the national targets are subject to periodic review and the Climate Change Commission has recently called evidence for the first of those reviews:
- WFF record here that Federated Farmers does not support the current national methane target, on the basis that it is not consistent with the latest science on the global warming potential of short-lived gases, including methane.
 - WFF is aware that other parties – including Council – take a different view.
 - Acknowledging these different views, WFF is clear that the forum for debating and resolving these differences is at the national level.
52. Returning to the regional inventory – and acknowledging the caveats above - the Wellington Region GHG Inventory (WFF 2.7) shows that emissions principally comprise (numbers rounded for readability):
- CO₂: nearly 2 million tons
 - principally from transport, plus industry and energy
 - Methane: 40,000 tons
 - principally from livestock, plus waste
53. In respect of **CO₂** – and against the proposed target of 50% reduction by 2030 – WFF understand that Council propose:
- Transport 1.7 million tons – up 14% in the period 2001-2019:

- 50% reduction would be around 850,000t
- Council propose 35% reduction, around 600,000t
- Energy 700,000 tons – down 18% in the period 2001-2019:
 - 50% reduction would be around 350,000t
 - Council propose no specific targets
- Industry 160,000 tons, up 400% in the period 2001-2019:
 - 50% reduction would be around 80,000t
 - Council propose that industry be excluded from the regional target

54. Accordingly, WFF estimate the gap to the 2030 CO2 target is over 1 million ton:

- Potentially 50% reductions in Energy (principally electricity consumption from the national grid) might be found before 2030?
- Leaving a gap of 750,000t

55. For clarity, achievement of the 2030 target for CO2 principally rests with the transport sector (which critically depends on central government investment) and the energy sector (which critically depends on investment into and the emissions footprint of the national grid).

56. In respect of **methane** – and against the proposed target of 50% reduction by 2030 – WFF understand that Council propose:

- Agriculture 34,000t, down 17% in the period 2001-2019:
 - 50% reduction would be around 17,000t
 - Council propose no specific targets
- Waste 5000t, down 36% in the period 2001-2019:
 - 50% reduction would be around 3000t
 - Council propose that industry be excluded from the regional target

57. Accordingly, the gap to the proposed 2030 regional methane target is around 20,000t.
58. For clarity, achievement of the proposed 2030 target for methane principally rests with the agriculture sector; and - pending technologies coming down the pipe in that timeframe - would imply massive livestock reductions:
- At 2022, StatsNZ show regional total livestock numbers (sheep, beef, dairy) at just over 1.5 million
 - This implies Council anticipate – or intend – that livestock numbers in this region should reduce by around 700,000 by 2030
59. Alternatively, in respect of forestry – given that the values above are gross emissions – it may be that Council contemplate a significant increase in carbon sequestration to achieve the net targets in Objective CC.3:
- The latest Council GHG inventory (2023) indicates total sequestration over 2 million tons:
 - Exotic forest: around 1.4 million tons
 - Native forest: around 800,000 tons
 - WFF estimate additional sequestration could potentially be needed not far short of 2 million tons CO₂e to plug the gaps outlined above, ie, **sequestration from trees roughly doubling by 2030**: this seems a very tall order (including and especially in the context that Council seek to incentivise natives and dis-incentivise exotics)
 - Council propose no target specifying the increase in forest area sought by 2030 (s42, Guest, para 264, our emphasis) because the necessary technical evaluation has not been carried out: **“adding an arbitrary target, without a robust evaluation, risks perverse outcomes”**
60. Arguably worse than adding an arbitrary target is proposing targets full of holes, and multiple flaws in the logic as to how they might be achieved in the Wellington region through RMA instruments. WFF is left only with a very significant concern that Council intent – notwithstanding that it is not explicitly articulated in PC1 – is to drive >50% reduction in farmed livestock by 2030, and close to zero livestock in the region by 2050.
61. Council rebut this concern (s42 CC General, para 211); *“Objective CC.3 does not require a 50% reduction in agricultural emissions by 2030 – this is a*

regional target. The author goes on to say: “I acknowledge there will need to be improved monitoring and understanding of gross and net emissions from different sectors to achieve objective CC.3. I understand there are a number of initiatives to achieve this underway, including the work of the Wellington Regional Leadership Committee to develop an emission reduction plan for the region”. WFF submit that this explanation serves principally to highlight again that PC1 is putting the cart before the horse: the work underway on the Regional Emissions Reduction Strategy should precede and inform any changes considered in the upcoming scheduled RPS review.

62. Council also rebut this concern in its technical evidence (Roos, para 75, 76), this time stating that PC1 specifies “*relatively low gross emissions targets for transport and agriculture*”, going to suggest that the logical consequence is that other sectors will need to do more than their fair share:

- WFF understand the reference to the relatively low target for transport (35%)
- WFF is confused as to the basis for asserting that PC1 specifies low targets for agriculture.

63. Council’s technical evidence also suggests (para 58, 60) that the targets set in Objective CC3 are “shallower” than Wellington City Council, and that Wellington City and Auckland City have adopted “all gases” GHG emissions reduction targets. This evidence omits to mention:

- These are non-statutory strategies: arguably Councils can pursue aspirational targets in non-statutory strategies, but different disciplines apply in the RMA context
- These are both cities: the contribution of agricultural emissions is around 5% in Auckland, and around 1% in Wellington
- Auckland (with 5% agriculture) in fact sets split-gas methane targets for agriculture; Wellington (with 1% agriculture) is silent on any agricultural actions; instead the strategy is about the other sectors which contribute 99%

64. In summary:

- Council propose regional GHG targets which are different to national targets (which are subject to periodic review)

- Council propose regional GHG targets notwithstanding that most of the levers for achieving them sit outside the RMA statutory process
- The apparent gap between the ambition of the regional targets and the execution through RMA instruments has not been explained
- The largest unexplained gaps are in Agriculture and Forestry
- The level of ambition on regional Transport targets is modest

SEQUESTRATION

65. As noted above, the targets proposed in Objective CC3 are net targets, ie, emissions less sequestration. WFF is not clear on the methodology that Council intend to rely on to estimate net emissions, including in the context that three different accounting conventions are employed at the national level depending on the reporting purpose. WFF is not clear if Council intend to rely on one of these, or whether an alternate regional methodology is intended.
66. Acknowledging this uncertainty, WFF currently understand that:
- The Regional GHG Inventory includes sequestration by forests (exotic and native)
 - WFF is not clear the extent to which it includes farm sequestration, eg, riparian plantings, shelter-belts, woodlots, space planted trees, pasture, soil
 - It does not include sequestration from non-tree sources, eg, blue carbon
67. The Regional Inventory (WFF 2.6) goes on to estimate net emissions by Whaitua, showing that the urban whaitua (Wellington, Hutt, Porirua) contribute 75% of net emissions:
- The rural whaitua contribute 25% (Wairarapa 14%, Kapiti 11%)
68. The regional inventory does not present net emissions by sector, but WFF submit that - to the extent regional targets are contemplated - this would be a necessary step (WFF 2.7):
- At farm level, many or most farms have an “effective” area focussed on farming, with the balance of the farm set aside (most often in trees)

- At sector scale, B&L commissioned independent research in 2020 which found New Zealand's sheep and beef farms are already close to being carbon neutral⁸

69. For clarity:

- WFF generally acknowledge and support any intent that gross CO₂ emissions (principally transport, followed by energy and industry) be reduced without relying on carbon offsets being the easy option (against the risk that increasing areas of the regions finite farmland continue to go into carbon forestry)
- WFF specifically insist that farm/sector sequestration be explicitly assessed against farm/sector methane emissions to derive a net emissions value. In this context, WFF does not support Policy CC8 (prioritising reductions over offsets) applying to Agriculture (including in the context that it is not clear what is in or out in respect of "gross" or "net" emissions from agriculture)

70. As noted earlier, the holes in Objective CC3 imply significant additional sequestration across the region, in particular from forestry. MPI is lead agency for forestry in the National Emissions Reduction Plan (NERP); and MfE guidance⁹ for how RMA plans can support the NERP includes:

- *Support enabling afforestation (right type and scale of the forests in the right places)*
- *Support encouraging native planting*

71. WFF support the role of trees on farms for multiple values (economic and environmental), at a range of scales (from space-planted silvo-pasture to commercial blocks of plantation forest), and a range of species (from proven performers in hard sites like poplars and pines to natives grown for biodiversity and beauty). WFF support the Climate Change Commission view of farms as "mosaics", integrating trees into farm systems to diversify income and enhance on-farm sequestration (WFF 2.9).

⁸ https://beeflambnz.com/sites/default/files/news-docs/BL_Carbon_report_for_review_final_submit.pdf

⁹ <https://environment.govt.nz/assets/publications/national-adaptation-plan-and-emissions-reduction-plan-guidance-note.pdf>

72. At the national level, the question of right tree/right place (and right treatment) is currently a live issue, including changes contemplated to the NES-Production Forestry (including in respect of carbon forestry). Notwithstanding that this work is in process, PC1 seeks to fundamentally change forestry settings in this region, broadly to:

- Incentivise natives (non-regulatory)
- Dis-incentivise exotics (regulatory)

73. The key provision is Policy CC6 (b) which on our reading amounts to close to a blanket prohibition on plantation forestry in this region (be it exotic or native):

- It directs that plantation forestry be avoided in specified areas:
 - This is a higher bar than the NES-PF, but Council have not provided s32 analysis of the reasons as directed by the RMA s32(4) (WFF 8.6)
 - Instead, Council rely on assuring that this only means non-complying, not prohibited (s42, Guest, para 303): WFF is not clear the extent to which PC1 provisions would support a non-complying consent application
- It directs that plantation forestry be avoided on highly erodible land:
 - Council proposed a definition, and then an amended definition, which is different to the methodology in the NES-PF
 - Acknowledging that the NES-PF mapping is crude and low-resolution, WFF cautioned against locking it into PC1 (WFF 8.6); Council agree, but instead propose relying on equally crude and low resolution definition/mapping, but this time with wider effect and no real consent pathway as provided in the NES-PF for applicants to provide higher resolution mapping
- It directs that plantation forestry be avoided in catchments where water quality targets for sediment are not reached:
 - With respect, that is potentially – probably – every catchment in the region
 - This provision is proposed in advance of the upcoming Regional Plan Change which will incorporate Whaitua

recommendations for water quality attributes including sediment related attributes

- WFF note that Council evidence to the pNRP Hearing was that *“there is a high level of confidence that a majority of sites have improving trends over the past decade for most variables. This is consistent with the results and conclusions in Snelder (2017a) and in my statement of primary evidence; that there is strong evidence of overall water quality improvement at the regional level over the past decade”*¹⁰
- The strong evidence of improvement included sediment related attributes (clarity, turbidity): notwithstanding these encouraging trends, we can reasonably assume that – in respect of most attributes including sediment – targets will generally be set to achieve a level of improvement. Ergo, all catchments will (probably) qualify under this criteria

74. For clarity: WFF is acutely aware of the risks highlighted by the recent cyclones in respect of plantation forestry. WFF is also acutely aware of the risks and consequences for rural communities associated with national policy settings “screwing the scrum” in favour of whole farm conversions to carbon forestry. Alongside that:

- WFF submit that plantation forests could and should continue to have a place on farms in the region (for all the values set out in Objective CC5)
- WFF is not clear how Council anticipate bridging the big holes in Objective CC3 without exotic forestry

75. A key tool to enable integrating forestry into farm mosaics – maximising the benefits and minimising risks – is high-resolution mapping (eg, at 1:10,000 rather than continuing to rely on mapping at 1:50,000 or more). The critical point is that the high spatial variability in the NZ landscape is poorly represented at those low-resolution mapping scales. Recognising this, MBIE funded a national project “Smarter Targetting for Erosion Control” intended to undertake the foundation research needed to support higher resolution mapping and smarter targetting, and that project is currently nearing

¹⁰ <https://pnrp.gw.govt.nz/assets/Uploads/HS4-ROR-evidence-Water-Quality-Ton-Snelder-11-May-2018.pdf>

completion (WFF 8.6). WFF potentially see merit in a method to achieve higher resolution mapping in this region and we return to this point below.

76. Turning to incentivising natives (WFF 8.6), WFF is on board with the intent. Our key point is that PC1 is not the tool for the job: we don't need a method to tell us the missing link is money. In respect of natives, the costs of establishment are an order of magnitude higher than exotics, the returns are an order of magnitude lower; and the research and systems are not yet in place for rapidly increasing plantings at scale (including and especially in respect of natives for carbon).
77. Related to this point: to the extent that carbon credits incentivised exotics, attention has more recently turned to biodiversity credits to incentivise natives and more than one national workstream is in process on this front. Alongside upcoming national initiatives in this area, WFF is aware of private markets: for example, a Wairarapa catchment group is currently exploring voluntary markets for carbon and biodiversity, ie, aligning with private/corporate capital to achieve catchment planting at scale (exotics and natives).
78. WFF acknowledge the strong partnerships between farmers and Council (putting trees in the ground) over many decades in this region; and we acknowledge the "shot in the arm" from Central Government funding in recent years. For example:
- The Wainuioru Catchment Group received over \$1m to hook into planting natives at scale; a nursery has been set up adjacent to Wainuioru School, with profits donated back to the school; and landowners in the catchment are in process of planting 80,000 native trees in this current planting season
79. The package of PC1 provisions directed to increasing and incentivising natives comprises:
- Objective CC5: seeking an increase (not quantified) by 2030
 - Policy CC6 (and CC18): seeking to incentivise natives
 - Policy CC7: clarifying the approach will be non-regulatory
 - Method CC4: prepare plan by 2024 to quantify how much and where
80. WFF broadly agree with the line of logic in respect of setting a target, ie, do the detailed work first, then consider an appropriate target. WFF note that this approach is strikingly at odds with the approach proposed in Objective CC3.

81. In respect of Policy CC7, WFF agree with Council (s42, Guest, para 202) that Policy CC7 should be re-drafted as a non-regulatory policy; and further agree (Guest, para 294, our emphasis) that: **“Regional Plans cannot require landowners or others to plant forests, but they can promote and incentivise this”**.
82. Returning to the very large gap in Councils emissions targets (which broadly imply doubling of forestry by 2030 alongside the clear Council intent to disincentivise exotics and incentivise natives), WFF is not clear how the PC1 package of non-quantified, non-regulatory forestry provisions which are all critically contingent on central government (and private) investment capital, will contribute to achievement of Objective CC3, either by 2030 or by 2050.
83. WFF is however clear that, while the RMA does not allow Council to make farmers plant trees, Council seek that the RMA be used to make farmers de-stock. WFF is again left with a very significant concern that Council intent – notwithstanding that it is not explicitly articulated in PC1 – is to drive >50% reduction in farmed livestock by 2030, and close to zero livestock in the region by 2050.
84. In summary:
- WFF support Council intent re incentivising natives but it is not clear that Chapter 3.1A will add value – or actually address – the barriers to planting natives at scale
 - To the extent Chapter 3.1A is retained, Policy CC6 should be amended to delete clause b (avoiding plantation forestry)
 - WFF is not clear how Councils twin aspirations (more natives, less exotics) will contribute to Councils proposed GHG targets
 - WFF is not clear how Council intend to estimate net emissions

MITIGATION – COMMERCIAL LEADERSHIP

85. The WFF submission (WFF 2.7) agreed with Councils advice to the Climate Change Commission in respect of converting crisis to opportunity:
- *“The opportunity has to be in activating shared and cross-government and sector responses to climate change that don’t disadvantage our economic resiliency; and advantage our response and activities that*

benefit from connections and enable commercial leadership in climate change solutions”.

86. Commercial leadership in climate change solutions is evident across the NZ economy, including in the agriculture sector. Over and above the HWEN partnership with central government, the primary sector is acutely tuned to market and consumer signals; and NZ pastoral farmers are already among the most emissions efficient producers¹¹ in the world (WFF 2.7).
87. A related initiative which is gaining traction in the commercial arena is the Science Based Targets Initiative¹² (SBTI), set up by a global consortium (WWF and others) to drive ambitious climate action in the private sector by enabling organisations to set science-based emissions reduction targets.
88. Around 4000 companies have signed up globally, of which around 30 are in New Zealand, including Fonterra, Synlait and Silver Fern Farms.
89. SBTI identifies emissions as: Scope One (direct emissions controlled by the company), then Scope Two (indirect emissions, inside the value chain), followed by Scope Three (indirect emissions, outside company control). Most commitments are made in respect of Scope One, then Scope Two.
90. SBTI canvasses international literature before deriving “science based targets” for a range of sectors, including the Agriculture and Forestry sector¹³. Key points as we understand them in respect of the Agriculture sector:
- Agriculture targets are developed in the context of both addressing mitigation and maximising food production and security:
 - Accordingly, SBTI recommend efficiency targets (emissions/kg product), not absolute reduction targets
 - Notably, New Zealand farmers are already ahead of the global averages for emissions efficiency of meat and milk products
 - Agriculture targets are slower than energy/industry because agricultural emissions are more challenging to reduce:

¹¹ <https://beeflambnz.com/knowledge-hub/PDF/summary-study-carbon-footprint-new-zealand-sheepmeat-and-beef.pdf>

¹²

<https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKEwj45bWw6dCAAxV1jVYBHbgSDA4QFnoECAYQAQ&url=https%3A%2F%2Fsciencebasedtargets.org%2F&usg=AOvVaw1xohPYDUBQbHnBjllMafEi&opi=89978449>

¹³ SBTI, Forest, Land and Agriculture Science Based Target-Setting Guidance

- Accordingly, SBTI assess “top down” targets alongside “bottom up” targets (considering mitigations available and least cost abatement curves) to derive “priority wedges” which identify the top 25 countries for mitigation action (New Zealand is not listed in the top 25)

- Agro-forestry (on or adjacent to working land) is counted against the Agriculture sector pathway target

- eg, riparian, silvo-pasture, biodiversity bridges etc

91. As noted above, Fonterra, Synlait and Silver Fern Farms have signed up to targets:

- Fonterra: manufacturing net zero by 2050, farming no net increase by 2030 (noting the current farm footprint is one-third of the global average)
- Synlait: off-farm 48% reduction by 2028, on-farm 30% emissions efficiency improvements (emissions/kg milk solids) by 2028
- Silver Fern Farms: target is net carbon zero beef, with 42% reduction in net emissions by 2030 (farm emissions less farm sequestration). Related to this, SFF are leading advanced work to map and measure on-farm sequestration with a view to paying farmers for the sequestration associated with permanent vegetation – natives, riparian etc)

92. In summary:

- The global SBTI Agriculture targets recommend emissions efficiency targets (not absolute reductions) to provide for food security alongside emissions reductions: and assess farm sequestration alongside farm emissions to derive net targets
- Off the back of decades of industry/government R&D partnerships and farmer uptake/innovation, New Zealand agriculture is already very well positioned in the global context on those key indices
- Major companies across the major farming sectors are continuing to raise the bar.

ADAPTATION – RURAL WATER RESILIENCE

93. In HS2, WFF submitted that water resilience is a key issue for the region (WFF 1.4, 1.5); and proposed a “regionally significant issue” and an “over-arching objective”, both focussed on water resilience:

- In the event, Council recommends the “over-arching” provisions be re-cast as “integrated management” provisions
- In this context, WFF acknowledge Council reasons for recommending rejection of the WFF submission which were to the effect that water resilience is a more discrete matter

94. In HS3, water resilience is to the forefront as a discrete matter, addressed in four of the five s42A reports, including (our emphasis):

- CC General (para 103): *“I acknowledge the concern from Wellington Water that **climate change is going to make water security an increasingly significant resource management issue for the region**”*
- Climate resilience (para 184): Climate change is increasingly challenging resilience and well-being *“**and increasing pressure on water supply**”*
- Natural Hazards (para 115, 106): *“**Recognising the importance of food production and water security**, it has now been included in the introduction”; and “The hazard exposure of people and communities, the natural environment, businesses and the economy, food production (including mahinga kai), water security, property and infrastructure is increasing because of climate change”*

95. In response to WFF and other submitters seeking more explicit provisions, Council recommend rejecting these submissions, including for the following reasons (our emphasis):

- Energy, Waste and Industry (para 107, 150): *“I do not agree with WFF that water storage infrastructure is inadequately provided for in Policy 7 and other provisions in the RPS. The definition of RSI includes the **local authority water supply network**...the benefits of this water structure are also clearly recognised in Policy 7 as essential services, the supply of **potable water**”; and “I do not agree with WFF that water*

storage infrastructure is not adequately provided for by Policy 39 for the same reasons outlined in relation to Policy 7”.

- Natural Hazards (para 369): ***“If water security is identified as a particular problem during an adaptation process, I would expect that the full range of possible solutions would be developed as part of that programme”***

96. WFF does not agree that it is a question of “if” water security is a problem; and WFF does not agree that making provision for urban and domestic water supplies addresses the water security challenge for food production and the economy.

97. To the extent the National Adaptation Plan is relevant in HS3, the First NAP – in the section titled “Addressing Inequity” - records (our emphasis):

- ***“Programmes targetted at water security will make the natural environment more resilient and support Maori, food and fibre producers and rural communities”***
- ***“Landowners, food and fibre producers and rural communities are especially vulnerable to both acute climate events and more gradual climate change impacts that affect water availability and security. These effects also limit options for landowners to implement climate-resilient landuses, including owners of undeveloped land”***
- ***“The water availability and security programme will enable the transition to a sustainable food and fibre sector, and support the resilience of rural communities and the welfare of animals”***

98. The water availability and security programme referenced in the NAP refers to a programme of work led by MPI (WFF 9.12) which highlights that global and domestic food production principally relies on irrigated, rather than rainfed land; and further (our emphasis) that:

- ***“Secure and reliable access to water is a necessary precondition for most future investments in landuse change, high value processing, and for reducing exposure to drought and climate-related events”***

99. In this region, a significant multi-stakeholder programme concluded in 2021 with publication of the Wairarapa Water Resilience Strategy (WFF 1.4) recommending a portfolio of natural and constructed storage solutions; and

recommending innovation and trials at catchment scale. The stakeholders in that process included Council, alongside TAs, Iwi, farmers, industry and community. WFF understand that (in the new triennium post the local government elections), Council have re-affirmed adoption of this Strategy.

100. To the extent that Chapter 3.1A acknowledges the importance of rural water security (recommended amendments to the introduction), WFF submit that there are currently no provisions which provide for that recognition or for an enabling framework, similar to that proposed for renewable energy.

101. In summary:

- Chapter 3.1A does not recognise the explicit risks of climate change for food production and the economy
- To the extent that the proposed insertion of Chapter 3.1A is progressed, WFF seek an explicit enabling framework for rural water resilience similar to that proposed for renewable energy

SECTION 42A REPORTS

102. FFNZ reiterate its primary relief that the proposed insertion of Chapter 3.1A be withdrawn. To the extent this chapter is progressed, WFF propose alternate relief on certain provisions below.
103. The reasons are principally set out in the original WFF submission, and above; and are briefly re-summarised below:
104. Statutory Framework:
- WFF does not agree the statutory basis for PC1 as set out by Council is sufficiently robust to support the proposals advanced in Chapter 3.1A
 - To the extent Chapter 3.1A may be required to have regard to - and to “complement” - the NERP and NAP, WFF submit that – to the contrary – Chapter 3.1A duplicates and conflicts with those documents.
105. S32 Analysis:
- Council have not undertaken analysis of the costs and benefits of deferring consideration of climate change provisions to scheduled upcoming RPS reviews
 - Chapter 3.1A has not been subject to robust cost-benefit analysis
 - Council has not tabled any evidence to demonstrate the efficiency and effectiveness of the proposed regulatory approach for Agriculture
106. Regional GHG Inventory and Proposed Targets:
- Council propose regional GHG targets which are different to national targets (which are subject to periodic review)
 - Council propose regional GHG targets notwithstanding that most of the levers for achieving them sit outside the RMA statutory process
 - The apparent gap between the ambition of the regional targets and the execution through RMA instruments has not been explained
 - The largest unexplained gaps are in Agriculture and Forestry
 - Another unexplained gap is the modest target for Transport

107. Sequestration:
- WFF support Council intent re incentivising natives but it is not clear that Chapter 3.1A will add value – or actually address – the barriers to planting natives at scale
 - To the extent Chapter 3.1A is retained, Policy CC6 should be amended to delete clause b (avoiding plantation forestry)
 - WFF is not clear how Councils twin aspirations (more natives, less exotics) will contribute to Councils proposed GHG targets
 - WFF is not clear how Council intend to estimate net emissions
108. Commercial Leadership:
- The global SBTi Agriculture targets recommend emissions efficiency targets (not absolute reductions) to provide for food security alongside emissions reductions: and assess farm sequestration alongside farm emissions to derive net targets
 - Off the back of decades of industry/government R&D partnerships and farmer uptake/innovation, New Zealand agriculture is already very well positioned in the global context on those key indices
 - Major companies across the major farming sectors are continuing to raise the bar.
109. Rural Water Resilience
- Chapter 3.1A does not recognise the explicit risks of climate change for food production and the economy
 - To the extent that the proposed insertion of Chapter 3.1A is progressed, WFF seek an explicit enabling framework for rural water resilience similar to that proposed for renewable energy
110. The formatting in the next section follows the order of the s42A Appendices: Recommended Amendments.

CLIMATE CHANGE – GENERAL

111. **Objective CC1:** WFF submit that Objective CC1 should be deleted
- To the extent PC1 includes attention to climate change, the amendments recommended in HS2 already provide for the same intent
112. **Objective CC2:** WFF submit that Objective CC2 should be deleted.
- In HS2, Council recommended deletion of Policy IM.2 Equity and Inclusiveness, including for the reason it was not clear how it related to the purpose of the RMA. WFF acknowledge that the concept of “equitable transition” is included in Climate Change Commission advice to Government, but WFF is not clear that has the same meaning as intended in Objective CC2.
 - WFF submit that other provisions in HS3 referring to “equity” (not listed here) should also be tested against the recommendation made in HS2
113. **Objective CC3:** WFF submit CC3 is un-necessary, uncertain, riddled with flaws and should be deleted.
- At minimum, it should be amended to not include Agriculture
 - Arising from s42 recommendations in respect of Industry and Waste, WFF submit it is not clear that those should be included
 - Acknowledging that national direction on renewable energy is anticipated, WFF submit it is not clear that Energy should be included
 - Acknowledging that separate legislation informs transport targets, WFF submit it is not clear that Transport should be included
114. **Objective CC8:** WFF recommend expanding the “empowering” intent to include business, farming and the community; and/or a new Objective CC8A to the following or similar effect:
- **Objective CC8A:** Commercial leadership in climate change solutions is enabled and empowered.
115. **Policy CC8:** WFF recommend amending “greenhouse gases” to read ‘CO2’
116. **AER:** WFF recommend amending “greenhouse gases” to read ‘CO2’

AGRICULTURAL EMISSIONS

- 117. **Policy CC5:** WFF submit it should be deleted
- 118. **Policy CC13:** WFF agree it should be deleted
- 119. **Method CC5:** WFF submit it should be deleted.

CLIMATE RESILIENCE AND NATURE BASED SOLUTIONS

- 120. **“Nature based solutions”:** WFF submit the definition should be amended to read:
 - “Solutions that are inspired and supported by nature and engineered solutions that mimic natural processes, that are cost-effective and simultaneously provide environmental, social and economic benefits and help build resilience”
- 121. **Policy CC4:** WFF do not agree that this urban policy be expanded to include rural areas
- 122. **Policy CC4A:** WFF submit this proposed new policy should apply in urban areas only
- 123. **Policy CC14:** WFF do not agree that this urban policy be expanded to include rural areas
- 124. **Policy CC14A:** WFF submit this proposed new policy should apply in urban areas only
- 125. **Policy CC7:** WFF agree this policy should be non-regulatory
- 126. **Objective CC5:** WFF submit that “permanent forest’ should be amended to read “afforestation”
- 127. **‘Highly Erodible Land’:** WFF submit this definition should be deleted
- 128. **Policy CC6:** WFF submit this definition should be deleted
- 129. **Method CC4:** WFF submit this should be amended to include a new clause to the following or similar effect:
 - Employment of high resolution mapping tools (1:10,000) to support preparation of the spatial plan and identification of areas appropriate

for permanent or plantation forestry, or for other afforestation treatments, eg, space planting

ENERGY, WASTE AND INDUSTRY

130. **Policy 2:** WFF note and agree with the recommended amendments
131. **Policy 7:** WFF submit Policy 7 should be expanded to include the benefits of rural water supply; or alternately a new Policy 7A to the following or similar effect:
- **Policy 7A:** recognising the social, economic, cultural and environmental benefits from rural water supply infrastructure to contribute to security of supply for primary production– district and regional plans
132. **Policy 11:** WFF submit a new Policy 11A should be added to the following or similar effect:
- **Policy 11A:** Promoting and enabling small and community scale rural water storage and distribution infrastructure
133. **Policy 39A:** WFF submit Policy 39A should be expanded to include rural water infrastructure, or alternatively a new Policy 39B to the following or similar effect:
- **Policy 39B:** recognise and provide for the social, economic, cultural and environmental benefits of rural water supply infrastructure; recognise and provide for the operational and functional need of rural water supply infrastructure to be in particular locations where the water resources exist

NATURAL HAZARDS

134. **Policy 51:** WFF agree with the recommended amendments to clause g) in respect of functional or operational need
135. **Policy CC16:** WFF submit it should be amended to include an additional clause to provide for climate adaptation options including rural water infrastructure

- 136. **Method 22:** WFF submit it should be amended by adding a clause to provide for assisting catchment groups and water user groups in the development of adaptation plans
- 137. **Introduction:** WFF agree with adding references to the risks to water security and food production
- 138. **Issue One:** WFF agree with adding risks to the economy

TRANSPORT

- 139. Policy CC1: WFF submits that the chapeau should be amended to read “by requiring all new and altered transport infrastructure as far as practicable...”, recognising the different context and constraints in rural areas
- 140. Policy CC9: WFF submits that this policy should be restricted to urban areas

CONCLUSION

- 141. WFF relief seeks that the provisions under consideration in HS2 be deferred to the scheduled upcoming review of the RPS.
- 142. To the extent provisions are retained, they should all be heard by the Schedule One Hearing Panel.
- 143. To the extent provisions are retained, WFF is open to alternate relief to address the concerns set out in its submission and in this Hearing Statement.