## BEFORE THE INDEPENDENT HEARINGS PANELS APPOINTED TO HEAR AND MAKE RECOMMENDATIONS ON SUBMISSIONS AND FURTHER SUBMISSIONS ON PROPOSED CHANGE 1 TO THE REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION

UNDERSchedule 1 of the Resource Management<br/>Act 1991 (the Act)IN THE MATTER OFHearing Submissions and Further<br/>Submissions on Proposed Change 1 to the<br/>Regional Policy Statement for the<br/>Wellington Region

# STATEMENT OF REBUTTAL EVIDENCE OF JEROME GEOFFREY WYETH

# ON BEHALF OF WELLINGTON REGIONAL COUNCIL

# HEARING STREAM THREE

## **CLIMATE CHANGE – AGRICULTURAL EMISSIONS**

22 August 2023

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## INTRODUCTION

- My full name is Jerome Geoffrey Wyeth. I am a Principal Planning and Policy Consulting at
  4Sight Consulting Part of SLR.
- 2 I have read the respective planning evidence and legal submissions of:
  - 2.1 Dairy New Zealand (DairyNZ).
  - 2.2 Horticulture New Zealand (HortNZ).
  - 2.3 Kāinga Ora Homes and Communities (Kāinga Ora).
  - 2.4 Upper Hutt City Council (UHCC).
  - 2.1 Wairarapa Federated Farmers (WFF).

## **QUALIFICATIONS AND EXPERIENCE**

3 My qualifications and experience are set out in paragraph 15-22 of my section 42A report for this topic, dated 31 July 2023. I repeat the confirmation given in that report that I have read and agree to comply with the Code of Conduct for Expert Witnesses.

#### **RESPONSES TO EXPERT EVIDENCE**

4 This section responds to submitter evidence in relation to the provisions in this topic. The recommended amendments to the Change 1 provisions in my section 42A report are shown in <u>red underlined marked out</u> below and further recommended amendments in this rebuttal evidence are shown in blue <u>underlined marked out</u> in Appendix 1 of this evidence.

# General comments on proposed Change 1 provisions relating to agricultural greenhouse gas emissions

#### DairyNZ

5 The evidence of DairyNZ<sup>1</sup> raises a number of concerns with the proposed Change 1 provisions relating to agricultural greenhouse gas (GHG) emissions<sup>2</sup>. DairyNZ maintain their position that it is important and preferable to wait until a national framework for the management of agricultural GHG emissions is in place before these matters are

<sup>&</sup>lt;sup>1</sup> This includes the planning evidence of Ms Hunter, the technical evidence of Mr Lincoln, and the hearing statement of Mr Cooper.

<sup>&</sup>lt;sup>2</sup> Note that DairyNZ also raise concerns with Objective CC.3 which is discussed in my rebuttal evidence for the Climate Change – General topic.

considered and potentially addressed at a regional level. In particular, DairyNZ are of the opinion that an agreed national framework will allow the Council to appropriately consider its role in the management of agriculture GHG emissions, especially where Change 1 seeks to go beyond the national targets in the Climate Change Response Act 2002 (CCRA) for methane emissions.

- 6 The technical evidence of Mr Lincoln for DairyNZ reiterates the need to separate the regulation of short-lived gases (i.e. methane) and long-lived gases (i.e. nitrous oxide and carbon dioxide) as these different types of GHG emissions have significantly different impacts on global warming based on how long the different greenhouse gases last in the atmosphere. DairyNZ consider the lack of separation between these two types of GHG emissions is a "flaw" in the Change 1 approach to agricultural GHG emissions.
- 7 DairyNZ also repeat their concerns that there is insufficient justification in the section 32 evaluation report for Change 1 for the proposed intervention for agricultural GHG emissions occurring prior to national policy being in place. DairyNZ also consider the section 32 evaluation report for Change 1 fails to adequately assess the economic and social costs associated with specific provisions in this topic.

#### WFF

- 8 The planning evidence of Mr Matich and the hearing statement of Ms McGruddy for WFF raise significant concerns with the proposed provisions in Change 1 relating to agricultural GHG emissions<sup>3</sup>. For example, Mr Matich is of the view that the Change 1 provisions are "out of step" with central government policy and directions on reducing agricultural GHG emissions.
- 9 Ms McGruddy's hearing statement for WFF reiterates their concerns that Change 1 provisions on agricultural GHG emissions *"have not been well-placed, well-planned, wellsignalled, and co-designed as recommended by the Climate Change Commission."* Ms McGruddy is of the opinion that Geater Wellington Regional Council have not provided any evidence to demonstrate the efficiency and effectiveness of the proposed regulatory approach for agriculture GHG emissions in Change 1. Ms McGruddy also reiterates the position of WFF is that the Change 1 climate change provisions duplicate and conflict with

<sup>&</sup>lt;sup>3</sup> Note that WWF also raise significant concerns with Objective CC.3 which is discussed in my rebuttal evidence for the Climate Change – General topic.

the Emission Reduction Plan (ERP) and National Adaptation Plan (NAP), rather than complement these national policy documents.

10 Ms McGruddy reiterates the primary relief sought by WFF for the climate change provisions in Change 1 to be withdrawn and deferred until the full review of the Regional Policy Statement (RPS) scheduled for 2024 on the basis that national climate change policy is still evolving, and it is not yet certain how the RPS can "complement" these national policy initiatives.

## Analysis and recommendations

- As outlined in the Climate Change General Section 42A Report and the Climate Change Agricultural Emissions Section 42A Report<sup>4</sup>, there are multiple reasons why it is important to reduce agricultural GHG emissions in the region and to act now through Change 1 to address climate change. I will not repeat these reasons in this rebuttal evidence but will reiterate some key points in response to the evidence and hearing statements of DairyNZ and WFF. This evidence should also be read alongside the technical rebuttal evidence of Mr Roos on behalf of Greater Wellington Regional Council who responds to the more technical points from DairyNZ and WFF, in particular Mr Roos disagrees with the need for split gas targets as requested in this evidence.
- In terms of the requests to withdraw any direction in Change 1 relating to agricultural GHG,I reiterate the following key points from my section 42A report for this topic:
  - 12.1 Firstly, it is widely accepted that there is an urgent need to respond to climate change Internationally (e.g. IPCC), nationally (e.g. Aotearoa New Zealand's first emissions Reduction Plan) and regionally (e.g. the climate emergency declared by Wellington City Council and Greater Wellington Regional Council).
  - 12.2 Secondly, agricultural GHG emissions make up approximately 34% of the region's GHG emissions. Consequently, a reduction in GHG emission from this sector is needed to "contribute" to the 2030 and 2050 regional GHG emission targets in Objective CC.3<sup>5</sup>.

<sup>&</sup>lt;sup>4</sup> In particular paragraphs 65-70 of the Climate Change – General Section 42A Report and paragraph 66-68 of the Climate Change – Agricultural Emissions Section 42 Report.

<sup>&</sup>lt;sup>5</sup> Note my rebuttal evidence for the Climate Change – General topic makes some further recommendations to Objective CC.3 and in particular its "contribute to" direction.

- 12.3 Thirdly, the proposed approach to reduce agricultural GHG emissions in Change 1 is primarily a non-regulatory one supported by the direction in Policy CC.5 to reduce agricultural GHG emissions through a future plan change that complements the national approach. I have recommended a number of amendments to Policy CC.5 and supporting Method CC.5 in response to submissions on this topic.
- 13 For these reasons, I do not agree with the requests to withdraw the Change 1 provisions relating to agricultural GHG emissions until an agreed national policy setting is in place. I also consider that the concerns that the Change 1 provisions will undermine national policy in evidence from DairyNZ and WFF are overstated, do not reflect the policy intent, and potentially misunderstand the intent of my recommended amendments to Policy CC.5 and Method CC.5.
- As outlined in my section 42A report for this topic (in particular paragraphs 73-76), the intent of the provisions in Change 1 relating to agricultural GHG emissions is not to undermine or duplicate central government policy. Rather, the intent is for the provisions to be aligned and complementary to the national response to "ensure there is no duplication and associated compliance costs"<sup>6</sup>. I have also recommended amendments to Policy CC.5 and Policy CC.8 in the section 42A report for this topic to make that intent clearer. Additionally, I recommended that Policy CC.13 is deleted as a "consideration" policy to ensure this does not result in any undue uncertainties and costs for the agricultural sector in the interim period before Policy CC.5 is given effect to. On this basis, I am still of the opinion that it is appropriate for Change 1 to provide clear policy direction that agricultural GHG emissions need to be reduced in the region while allowing flexibility for this to occur through Policy CC.5 with some immediate action through the non-regulatory Policy CC.15 and Method CC.8.
- 15 Regarding the general concerns from DairyNZ and WFF relating to the section 32 evaluation report for the climate change provisions, this is addressed in my section 42A report for the Climate Change General topic (paragraphs 69-70). In this report, I note that it is not feasible or appropriate to undertake a detailed analysis for all the Change 1 provisions relating to climate change which are to be given effect to through a future regional or district plan change. I also note in the section 42A report for this topic (paragraphs 77, 80 and 157) that the analysis of the climate change and agriculture

<sup>&</sup>lt;sup>6</sup> Sectio 32 Report for Change 1, pg.135.

provisions in the section 32 evaluation<sup>7</sup> is broadly sufficient and that the plan change that gives effect to Policy CC.5 will be subject to section 32 evaluation requirements that will include a more detailed assessment of options – both regulatory and non-regulatory. My recommended changes to Method CC.5 are also intended to ensure Policy CC.5 is supported by a robust assessment of options and associated benefits and costs. I consider that this is an appropriate response in the context of the concerns raised in submissions and section 32 evaluation requirements.

16 The request to defer the provisions in Change 1 until the full review of RPS scheduled in 2024 has already been considered in Hearing Stream 1 and Hearing Stream 2. Put simply, there is no certainty that a full review of the RPS will occur in 2024. In my opinion, it is not appropriate to defer the climate change provisions in Change 1 in light of this uncertainty and the need to act now to address climate change.

#### Policy CC.5 – Reducing agricultural greenhouse gas emissions

17 Policy CC.5 is addressed in the evidence of DairyNZ, HortNZ, UHCC and WFF. Additionally, HortNZ supports my section 42A recommended amendments to Policy CC.5.

#### **DairyNZ**

18 Ms Hunter generally agrees with the statements and recommended amendments to Policy CC.5 in my section 42A report for this topic. However, given that the amendments specifically recognise that central government are taking the lead on the policy approach to reducing agricultural GHG emissions, Ms Hunter is of the view that Policy CC.5 is not necessary. Ms Hunter's opinion is that Policy CC.5 will not result in any additional benefits that will not otherwise be achieved through the national policy approach and supporting initiatives. Accordingly, Ms Hunter recommends that Policy CC.5 be deleted.

#### Upper Hutt City Council

19 Ms Rushmere is concerned that including Policy CC.5 in the RPS is premature given my comments in the section 42A report that 'there are a number of practical challenges and questions about how Policy CC.5 can be best implemented through a future regional plan change'. Ms Rushmere disagrees that Policy CC.5 should be included before further work is undertaken to understand what reduction in agricultural GHG emissions is necessary to achieve Objective CC.3 and how this translates into 'fair, equitable and cost-effective

<sup>&</sup>lt;sup>7</sup> Refer pg. 134 to 146 of the section 32 evaluation report for Change 1.

*regional policy that complements national policy'* (quoting my section 42A report for this topic).

20 Ms Rushmere is also concerned about the lack of analysis in the section 32 evaluation report for Policy CC.5 and does not agree that deferring detailed section 32 analysis to a future plan change process is justified. On this basis, Ms Rushmere recommends that Policy CC.5 be deleted from Change 1 and deferred to a later plan change.

## WFF

- 21 Mr Matich has a range of concerns with Objective CC.3, which are summarised in my rebuttal evidence for the Climate Change General topic. Mr Matich requests that Objective CC.3 is deleted or, alternatively, that agriculture is removed from the objective. Based on this requested relief from WFF, Mr Matich is of the opinion that Policy CC.5 serves no purpose and requests that it is deleted.
- 22 The hearing statement from Ms McGruddy sets out extensive concerns and comments with Change 1 provisions relating to agricultural GHG emissions. Ms McGruddy is particularly concerned that there is no evidence to demonstrate the efficiency and effectiveness of the proposed regulatory approach in Change 1 for reducing agriculture GHG emissions. Given these concerns, Ms McGruddy recommends that Policy CC.5 is deleted.

# Analysis and recommendations

- 23 In response to Ms Hunter's and Mr Matich's views that Policy CC.5 is no longer necessary, I disagree. The rationale for Change 1 including direction and provisions on reducing agricultural GHG emissions is set out above and in the section 42A report for this topic.
- I remain of the opinion that Policy CC.5 is necessary as it continues to be unclear what central government will deliver in terms of their approach to reducing agricultural GHG emissions and there continues to be a risk that this response will be further delayed<sup>8</sup>. It may well be that the confirmed national policy response to agricultural GHG emissions means that the approach to implement Policy CC.5 continues to be a largely non-regulatory response. It is also important to note the policy direction in Policy CC.5 for regional plans to

<sup>&</sup>lt;sup>8</sup> On 18 August 2023, central government announced some delay to farm-level reporting of climate change emissions and pricing. This would result in farmers reporting and paying for emissions from 2027. The National Party has said it would stop agriculture being added to the ETS, and aims to create an independent board to implement a pricing system for agricultural emissions, by 2030 at the latest.

*"support reductions in agricultural greenhouse gas emissions"* which does require a hard regulatory response as indicated by WFF.

- 25 However, as set out in my section 42A report and above, I retain the opinion that it is beneficial to act now through Policy CC.5 to set out clear direction that agricultural GHG emissions need to be reduced in the region while providing flexibility to ensure that the future plan change that implements Policy CC.5 complements national policy. The alternative relief requested (withdrawal and/or defer the policy) will inevitably result in further inaction and it is uncertain whether there would be an opportunity to reinstate a similar policy though a future RPS review as outlined above. For these reasons, I consider that the combination of Policy CC.5 and Method CC.5 is the most effective and efficient way to achieve the climate change objectives in Change 1 in a way that appropriately considers the broader national climate change context.
- 26 The other points raised in the evidence and statements of UHCC and WFF have been addressed in my section 42A report and above. Both submitters request that Policy CC.5 be deleted or deferred without any offering any alternatives or solutions on more appropriate policy direction. Consequently, I do not recommend any further changes to Policy CC.5 in response to the evidence and statements of UHCC and WFF.

#### Policy CC.13 – Managing agricultural greenhouse gas emissions

27 Ms Hunter on behalf of DairyNZ, Ms Woodbridge on behalf of Kāinga Ora, Ms McGruddy on behalf of WFF and Ms Rushmere on behalf of UHCC all support my section 42A recommendation to delete Policy CC.13. I therefore provide no further comment on this provision.

#### Policy CC.15: Improve rural resilience to climate change

28 Policy CC.15 is addressed in the evidence of UHCC. Ms Rushmere agrees that it is appropriate for Policy CC.15 to be a non-regulatory policy and that territorial authorities can play a role in supporting climate change resilience and mitigation. However, Ms Rushmere considers that Policy CC.15 should be a regional council function as many territorial authorities do not possess the resources to implement some of the climate change adaptation and mitigation efforts proposed in Policy CC.15. Ms Rushmere therefore recommends that Policy CC.15 is amended to clarify that Greater Wellington Regional Council is responsible for implementation.

#### Analysis and recommendations

As I note in my section 42A report for this topic (paragraph 115) I do not agree that the responsibility for implementing Policy CC.15 should be limited to Greater Wellington Regional Council. While I expect that Greater Wellington Regional Council will be the lead agency in the implementation of Policy CC.15, it remains my view that territorial authorities also need to help implement the policy through working with the primary sector and their communities to improve resilience to rural climate change. The actions to support rural communities in Policy CC.15 are also worded in an enabling and flexible manner and are therefore not likely to result in any onerous requirements for territorial authorities in my view. I therefore recommend no changes to Policy CC.15 in response to the evidence of Ms Rushmore.

#### Method CC.5 - Confirm regional response to reducing agricultural greenhouse gas emissions

30 Method CC.5 is addressed in the evidence of WFF, DairyNZ and HortNZ. Ms McGruddy recommends that Method CC.5 is deleted without providing any specific reasons whereas Ms Sands for HortNZ supports my section 42A recommended amendments to Method CC.5.

#### <u>DairyNZ</u>

- 31 Ms Hunter understands the intent of my section 42A recommended amendments to Method CC.5. However, Ms Hunter is of the view that there is a disconnect between the amendments to Policy CC.5 and the amendments to Method CC.5. Ms Hunter notes that Policy CC.5 does not set a timeframe for implementation or explain that a preferred option will be selected to support landowners/farmers to reduce agricultural GHG emissions. Ms Hunter is of the opinion that setting an "arbitrary" date of 31 December 2024 to confirm the approach to implement Policy CC.5 in Method CC.5 is premature in the context of the He Waka Eke Noa framework. Ms Hunter also raises concerns that the direction and timeframes in the revised method will likely lead to provisions and methodologies that will soon become outdated if they are locked into RPS provisions that only need to be reviewed every 10 years.
- Therefore, Ms Hunter is of the view that it is preferable to retain the notified wording in Method CC.5 to monitor progress and then initiate a review by a certain date.
  Alternatively, Ms Hunter reiterates the relief sought in the DairyNZ submission to delete Method CC.5 as a corollary request to the deletion of Policy CC.5.

#### Analysis and recommendations

33 In terms of the evidence of Ms Hunter, I still consider that it is important for Method CC.5 to set a clear date to undertake the necessary work to understand how to best implement Policy CC.5 taking into account the matters listed in the method as recommended in my section 42A report for this topic. However, I appreciate that this amended wording of Method CC.5 may suggest that a plan change to implement Policy CC.5 need to be initiated or notified by 31 December 2024. This is not the intent and may not be desirable or appropriate due to a range of factors, including potential changes in national policy discussed above. To address this issue and provide more flexibility while also retaining the intent of the recommended amendments to Method CC.5 in my section 42A report, I recommend the following amendments:

> By 31 December 2024, Wellington Regional Council confirm the preferred policy approach and timeframe option to implement Policy CC.5

34 This minor amendment retains the policy intent of my section 42A recommendations to Method CC.5. I therefore consider that the section 32AA evaluation in that report (paragraph 130) and the analysis above satisfies section 32AA requirements.

# Method CC.8: Programme to support low-emissions and climate resilient agriculture – nonregulatory methods

35 Method CC.8 is addressed in the evidence of HortNZ. Ms Sands for HortNZ reiterates the requests in their submission to recognise the importance of enabling land use change to low-emissions land uses, and specifically to enable land use change to horticulture. HortNZ request that Method CC.8 is amended to explicitly refer to low emissions land use change to enable this.

#### Analysis and recommendations

36 While I agree with the intent of the requested relief from HortNZ, I retain the position in my section 42A report that this level of specificity is unnecessary in Method CC.8. As noted in my section 42A report, a transition to horticulture with less GHG emissions may be a likely outcome from clause (c) of Method CC.8, but I prefer the general direction to promote and support actions to reduce agricultural GHG emissions. I am also not aware of restrictions in the Wellington region that restrict a transition to lower GHG emissions landuses. I therefore do not recommend any amendments to Method CC.8 in response to this relief sought by HortNZ.

#### Other issues raised in evidence

- 37 Ms McGruddy on behalf of WFF raises issues regarding rural water resilience/security and
  Ms Sands on behalf of HortNZ raises concerns relating food security.
- 38 Ms McGruddy on behalf of WFF raises several issues relating to 'adaptation rural water resilience' in her hearing statement. Ms McGruddy notes that the issue of water resilience is addressed in a number of section 42A reports for Hearing Stream 3. Ms McGruddy disagrees with my section 42A report for the Climate Change - Energy, Waste and Industry topic with the implied assumption that making provision for urban and domestic water supplies addresses the water security challenge for food production and the economy. Ms McGruddy also references the Wairarapa Water Resilience Strategy as an example of a multi-stakeholder programme highlighting the importance of rural water resilience.
- 39 WFF is concerned that, while Chapter 3.1A recognises water security as an important issue, there are no provisions which provide for this recognition. WFF seeks an explicit enabling framework for rural water resilience that is similar to that proposed for renewable energy, although the details of this 'enabling framework' are not provided by WFF. Ms McGruddy also notes that Chapter 3.1A does not recognise the explicit risks of climate change for food production and the economy.
- 40 The rebuttal evidence of Mr Dawe for the Climate Change Natural Hazards topic addresses several requests from HortNZ to add food security as a matter of consideration in the natural hazard provisions. Ms Sands and Ms Lander on behalf of HortNZ reiterate in their statement and evidence that food security is a nationally important issue that must be addressed at all meaningful levels. Although HortNZ primarily raise this concern in the context of the natural hazard provisions, Ms Sands reiterates the need for an integrated approach to climate change mitigation and adaptation and some of the issues raised relate to the rural resilience provisions in this topic.

#### Analysis and Recommendations

41 The relief sought by WFF and HortNZ in relation to water resilience and food security respectively are not specific to this topic. However, after discussing the relief sought with the section 42A report authors for the natural hazard and climate resilience topics, I consider that these issues are most appropriately addressed through Policy CC.15, which focuses on improving rural resilience to climate change. I consider that this can be effectively achieved through an amendment to Policy CC.15(b) as follows, which is also set out in the evidence of Mr Dawe:

"(b) promoting and supporting land management practices and/or land uses, <u>including</u> <u>nature-based solutions</u>, that improve resilience to climate change, <u>including nature-based</u> <u>solutions</u>, including rural water resilience and food security."

- 42 I do not agree with the relief sought by Ms McGruddy to provide an explicit enabling framework for rural water resilience. Ms McGruddy has not provided any details as to what this enabling framework would look like, and I consider that there would be scope issues from introducing a completely new enabling framework for rural water resilience at this time.
- 43 I also understand that Mr Dawe is recommending an amendment to Method CC.8 in response to Ms McGruddy's requests to include a method to assist catchment groups and water user groups in the development of adaptation plans. I support this amendment which is set out in Appendix 1 of this evidence.

DATE:

22 August 2023

Jerome Wyeth

Principal Planning and Policy Consultant, 4Sight Consulting – Part of SLR

# Appendix 1: Recommended amendments to provisions -

# **Climate Change – Agricultural Emissions**

Section 42A recommended amendments shown in red <u>underlined</u> and <u>marked up</u> text, rebuttal evidence recommended amendments shown in blue <u>underlined</u> and <u>marked up</u> text.

# Policy CC.5: Avoid increases in Reducing agricultural greenhouse gas emissions<sup>9</sup> – regional plans

Regional plans shall include objectives, policies, rules and/or methods to support reductions in agricultural greenhouse gas emissions from 2019 levels to contribute to the Objective CC.3 2050 net-zero emissions target. avoid changes to land use activities and/or management practices that result in an increase, in gross greenhouse gas emissions from agriculture.

**Explanation**: As agriculture is the second largest emitter of greenhouse gases in the Wellington Region, contributing 34 percent of the region's *greenhouse gas emissions*, reducing emissions from the agricultural sector is critical to contribute to achieving Objective CC.3. While central government is taking the lead on the policy approach to reduce agricultural *greenhouse gas emissions* through the use of a pricing mechanism (the Emissions Trading Scheme), Policy CC.5 seeks to complement this by directing regional plans to include provisions to support reductions in agricultural emissions. This will be supported by non-regulatory Policy CC.15 and Method CC.8 that seek to support change and improved management practices at a farm level to reduce *greenhouse gas emissions*. this policy sets a minimum expectation that there should be no increase in agricultural greenhouse gas emissions in the Wellington Region.

As of 30 November 2022, regional councils are able to make rules to control the discharge of greenhouse gases having regard to the effects on climate change. This policy is intended to provide flexibility as to how agricultural greenhouse gas emissions are reduced through a future regional plan change process which A plan change process will determine the way in which Policy CC.5 is given effect to and will need to consider issues such as equity and the relationship with the national pricing approach for agricultural greenhouse gas emissions to ensure that these are complementary.

Policy CC.15: Managing agricultural gross greenhouse gas emissions – consideration

<sup>&</sup>lt;sup>9</sup> Note the Climate Change – General Section 42A Report recommends a new definition of 'greenhouse gas emissions' to replace the two separate definitions of 'greenhouse gases' and 'emissions' proposed in Change 1.

When considering an application for a resource consent, associated with a change in intensity or type of agricultural land use, particular regard shall be given to:

(a) reducing gross greenhouse gas emissions as a priority where practicable, and

(b) where it is not practicable to reduce gross greenhouse gas emissions, achieving a net reduction in greenhouse gas emissions, and

(c) avoiding any increase in gross greenhouse gas emissions.

**Explanation:** As agriculture is the second largest emitter of GHG in the region, contributing 34 percent of the region's GHG emissions, reducing emissions from this sector is critical to contribute to achieving Objective CC.3. As of 30 November 2022, consent authorities may have regard to the effects of discharges into air of greenhouse gases on climate change in considering an application for a discharge permit or coastal permit. Where resource consent is required in association with a change in land use intensity or type of agricultural land use, the policy requires a hierarchy of effort, seeking to reduce gross greenhouse gas emissions in the first instance, followed by achieving a net reduction, with a minimum expectation that any increase in gross emissions is avoided.

# Policy CC.15: Improve rural resilience to climate change – non-regulatory

Support rural communities in their climate change adaptation and mitigation efforts, including by:

(a) providing practical and easily accessible information on climate change projections at a local level,

(b) promoting and supporting land management practices and/or land uses. including nature-based solutions, that improve resilience to climate change, including nature-based solutions, including rural water resilience and food security, (c) promoting and supporting land management practices and/or land uses that will reduce gross greenhouse gas emissions,

(d) giving preference to climate change efforts that also deliver benefits for indigenous biodiversity, land, fresh and coastal water.

**Explanation:** This policy promotes and supports low emission agriculture and increased rural resilience to climate change.

# Method CC.5: Confirm Review regional response to reducing agricultural greenhouse gas emissions

Monitor changes in agricultural land use and land management practices and review the regional policy approach by By 31 December 2024, Wellington Regional Council confirm the preferred policy approach and timeframe option to implement Policy CC.5, taking into account changes in agricultural land use and land management practices, responding to any predicted changes in greenhouse gas emissions from the agricultureal sectorion in the Wellington Region, regulatory and non-regulatory responses, and relevant any new national policy direction and initiatives.

# <u>Method CC.8: Programme to support low-emissions and climate-resilient</u> <u>agriculture-non-regulatory methods</u>

By June 2024, develop and start implementing a targeted climate change extension programme, with mana whenua/tangata whenua and relevant stakeholders, to actively promote and support changes to reduce agricultural greenhouse gas emissions and increase rural land use resilience to climate change, including by:

(a) providing practical and easily accessible information on projected climate change impacts at a local level,

(b) providing base data held by the regional council to support the development of farm greenhouse gas emission profiles,

(c) promoting and supporting actions to reduce agricultural gross greenhouse gas emissions and/or increase climate resilience,

(d) identifying appropriate areas and species for tree planting/natural regeneration in farm plans as part of implementing the regional spatial forest plan (see Method CC.4),

(e) identifying other on-farm nature-based solutions that will increase the resilience of a farm system and/or catchment to the effects of climate change, (f) identify and assist catchment groups and water user groups in the development of adaptation plans and

(fg) supporting central government and industry climate change programmes/initiatives.

Implementation: Wellington Regional Council