

Hurunui District Council submission to the emissions reduction plan discussion document: Te hau mārohi ki anamata – transitioning to a low-emissions and climate resilient future.

This submission was made via the online submission portal on the Ministry for the Environment website on 19 November 2021.

What do you think are the most important things to be considered in the development of the emissions reduction plan?

The Hurunui district is predominantly rural land interspaced with small service towns. The district economy is primarily reliant on primary production and tourism. This context informs the lens and focus of our comments.

Boosting indigenous biodiversity outcomes

How indigenous biodiversity outcomes can be boosted in tandem with meeting emissions reductions targets. We support the measures in the Canterbury Mayoral submission to modify the ETS to:

- (a) Recognise the additional benefits (e.g., biodiversity) that native afforestation provides, in comparison to exotic afforestation.
- (b) Remove the hurdles involved in registering naturally regenerating native forest.
- (c) Reduce/write off costs for native forests.
- (d) Make this land use decision low risk for investors or land managers. Currently the process is tedious and high risk which is seeing landowners clear this land and replant with exotic crops.

We also support mechanisms to encourage landowners to retire marginal farmland to allow for the natural regeneration of native ecosystems. This would need to work in with changes to the ETS outlined above to change the value/eligibility of regenerating indigenous forest so landowners aren't pressured to clear and plant with exotic forestry to make financial requirements work.

Alongside this a key consideration in the development of the ERP with regards to the ETS and reforestation needs to be a focus on 'right tree, right place'. We consider this is important to ensure that as well as achieving ETS outcomes, outcomes for biodiversity and freshwater are also achieved. We also consider this is important when considering the high flammability of pine species and the likely increased risk of wildfire due to climate change.

Focus shouldn't just be on planting trees, it should also focus on the management of forests to maintain soil conservation and biodiversity values, including pest management to ensure maximum sequestration is maintained over time.

Linked up government approach

Ensure there are clear links between different government strategies and that competing issues aren't created. The ERP needs to work efficiently and effectively with other government documents such as the Waste Minimisation Strategy (currently being consulted on), the Biodiversity Strategy and NPS for Indigenous Biodiversity, and the NES for Freshwater.

Clear and early communication

Landowners are constantly making investment decisions on the use of their land, sometimes several years in advance. Therefore, to make changes sufficient lead in time is required.

Therefore, we advocate that consideration is given to early communication of what success looks like and guidance for landowners to use when planning and making investment decisions.

Additionally, the science around climate change is complex, including the wide target for biogenic methane. We consider it would be useful to consider as part of the farm services education that this includes plain english explanations of the science to help landowners fully understand what the goalposts are and why, along with how changes on their land contribute.

Whole of farm approach

We support increasing delivery of extension services. We agree with the Canterbury Mayoral Forum submission that on-farm emissions measurement and management is delivered as part of a broader approach that integrates with existing farm environment management plans, and that local authorities are included in this work.

Social impacts of landuse changes

Consideration should be given to the social impacts of land use changes, such as large-scale forestry, on small communities. When planning and making decisions we consider it necessary to ensure that all costs and benefits are weighed up. Taking forestry as an example, forestry may result in less jobs in rural communities than through more traditional rural land uses. This has knock on effects to rural service towns, schools and the wider community social fabric if individuals and families have to relocate to find work. We consider it highly important to not only consider how to encourage reforestation, but how jobs can be created around this to ensure our rural communities are not further eroded. We make a suggestion further down in our submission.

Waste education funding

We support the proposal for waste education funding.

Ensure perverse outcomes are avoided

The discussion document outlines that Aotearoa New Zealand is already one of the most efficient and effective producers. It is important to ensure any changes do not drive production offshore where it may be less efficient and effective and therefore, while reducing our national emissions, result in them being increased elsewhere as a result.

What new initiatives would you include in an emissions reduction plan for Aotearoa?

- We support a focus on making better use of rail to transport freight. We advocate for a separate funding stream that enables rail to become a viable option whilst ensuring that funding of rail freight options are not at the detriment of road transport. This should include funding or strategic planning to create inland ports near railway lines so only short truck journeys are required and the majority of a products journey is on rail.
- Link the rollout of broadband in rural communities into the ERP. Broadband provides people with options, such as: working from home, reducing vehicle movements; and ensuring greater use of technology to generate on farm efficiencies that may contribute to the reduction of emissions.
- We would like to see a greater emphasis on research and development of hydrogen technology. For example, we see river flows running out to sea as a wasted opportunity for hydrogen generation.

- Amendment of the National Environmental Standard for Plantation Forestry to provide regulation of permanent exotic forests that are not currently captured by the standard.

What do you see are the main opportunities and impacts of emissions reduction policies in Aotearoa?

Opportunities

- With an increase in forestry to meet emissions reduction targets there is an opportunity to bring processing of logs back onshore rather than selling whole logs overseas for instance providing job opportunities in local areas through the processing of logs into products that can be sold in New Zealand. This could help offset loss of jobs through change in land use to forestry. Incentives could be used to encourage this industry.
- Weed and pest control is very important in all forestry both exotic and indigenous. To offset loss of jobs there could be investment in weed and pest control programmes creating local employment for communities.

Impacts

- An impact we see is that if reforestation, particularly of exotic pines, is not managed well, this could pose a significant risk as climate change brings more adverse weather events, for example increased fire risk and spread, or slash in flood events.
- We do not consider our rural communities should be penalised by a levy on farm utility vehicles before a suitable alternative available in the New Zealand market. Farmers and rural contractors are heavily dependent on the diesel and petrol utility vehicles that are a proven safe, economical, reliable and robust tool that is essential for their working conditions. It is important to note there are no EV charging stations on back country roads or public transport.
- As stated earlier in our submission, there is high potential for negative social, cultural, and economic impacts on rural communities if any substantial changes in land use are incentivised without consideration of all these wellbeings when forming policies.