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Hearing Statement of Anna Sing  
For DairyNZ Ltd.

28 June 2023

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## **Submitter S136**

### **Proposed Change 1 to the Greater Wellington Regional Policy Statement**

#### **Hearing Stream 1: Overview and General Submissions**

##### **I. Introduction**

1. My name is Anna Sing, I am a Senior Regional Policy Advisor at DairyNZ. My role involves identifying the impact of policies on the dairy sector and potential solutions.
2. I have 7 years of experience in policy processes regarding resource management at a national and regional scale, predominantly from roles in the Ministry for Primary Industries as well as the Ministry for the Environment, prior to working for DairyNZ.
3. I have a Bachelor of Science from Victoria University of Wellington Te Herenga Waka.

##### **II. General comments**

4. DairyNZ appreciates the opportunity to be heard in respect of our submission to Proposed Change 1 (PC1).
5. We will take our submission as read. Today I will expand on our submission points in relation to the following:
  - a. Why the scope of PC1 should focus solely on those changes required to implement the NPS Urban Development.
  - b. Our concerns with PC1 including biodiversity and mitigation of agricultural greenhouse gas emissions.
  - c. Our concerns relating to the lack of engagement with rural communities over the provisions relating to Te Mana o te Wai.

##### **III. Scope of PC1**

6. We recognise Council is required to give effect to the NPS-UD within set timeframes. We also recognise why an integrated approach to addressing resource management issues resulting from urban development should be considered at the same time as enabling urban development.

7. Our concerns relate to matters beyond enabling urban development and the resource management challenges resulting from urban development. In summary these concerns are:
  - a. PC1 preceding national frameworks relating to the management of agricultural greenhouse gas emissions and biodiversity.
  - b. The resulting inability to appropriately assess the need for, and costs and benefits relating from, provisions relating to greenhouse gas emissions and biodiversity proposed through PC1.
  - c. The lack of engagement with rural communities in relation to Te Mana o te Wai as it applies to water bodies and freshwater ecosystems in the region.

#### **IV. Management of agricultural greenhouse gas emissions**

8. We recognise climate change and biodiversity will be addressed specifically in later hearing streams. Our intention through this hearing is to raise concerns around the scope of PC1 and the inclusion of provisions relating to climate change mitigation and biodiversity.
9. In summary, we do not believe PC1 can properly consider the costs, benefits or optimal regional council functions in the management of agricultural greenhouse gas emissions or indigenous biodiversity when the frameworks for managing these matters are not yet settled at a national level.
10. PC1 proposes objectives and policies which consider climate change. These include provisions seeking the mitigation of agricultural greenhouse gas emissions through policies CC.5 and CC.13.
11. As the panel will be aware, the National Emissions Reduction Plan proposes to address greenhouse gas emissions through several mechanisms, including a yet to be established framework for the pricing of agricultural emissions and through yet to be fully developed methods to support transition to lower-emissions land uses and systems.
12. These actions are still being developed. As a result, we do not know what these national frameworks will require of farmers, the mechanisms that will be put in place for reductions in agricultural greenhouse gas emissions, the extent of reductions that will result, and how the provisions proposed through PC1 may support or conflict with these national efforts.

13. With that in mind, we do not consider Council can properly fulfil its obligations under s32(1) of the RMA to examine whether the provisions are the most appropriate way to achieve the objectives of the RPS. Nor do we consider that Council can fulfil its obligation under s32(2) of the RMA, to identify and assess the benefits and costs of the proposed provisions. We will expand upon these concerns in Hearing Stream 3.
14. We have similar concerns in relation to the management of indigenous biodiversity in rural areas of the region, given the National Policy Statement Indigenous Biodiversity has not yet been gazetted.
15. We acknowledge components of PC1 seek to support primary production in adapting to climate change. We acknowledge and welcome this intent. However, we believe it is important that these national frameworks are in place prior to the issues being identified, and then as a second step addressed, through the RPS. As a result, we believe these matters should not be addressed through PC1. Rather, they should be addressed through future plan changes.

**V. Community engagement over implementation of the NPS-FM**

16. PC1 seeks to insert a Te Mana o te Wai objective into the RPS. DairyNZ is concerned at the lack of engagement in relation to this objective, specifically whether there has been sufficient effort to consult with the region's rural communities.
17. Clause 3.2 of the NPS-FM requires regional councils to consult with both tangata whenua and communities to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region.
18. The question of whether consultation has been sufficient or not is addressed in the S42A General Submissions Report, where the author noted that 'targeted consultation' was undertaken, and that the extent of consultation is a matter for Council.
19. While there has been discussion with the Greater Wellington Farming Reference Group, we do not consider this represents sufficient consultation with the region's rural communities under clause 3.2 of the NPS-FM, particularly given the potential impacts of freshwater related regulations on the primary sector, in specific rural communities and economies.

20. While the dairy farming sector represented only 0.2% of the Wellington Regional GDP in 2019, the dairy sector has a more considerable contribution to the rural areas of the region, particularly South Wairarapa, Carterton and Masterton.
21. The South Wairarapa economy is more heavily dependent on agriculture. The primary sector makes up 22.8% of the local economy. Dairy farming makes up 6.4% of the economy <sup>1</sup>. The Dairy sector and the sheep and beef sector, and rural support services, are mutually reinforcing.
22. Reports by the Local Government Commission recognise these distinctions and the importance of 'similarities in socio-economic characteristics' as a key component of defining communities in the Wellington Region. This has not been reflected in community consultation.<sup>2</sup>
23. Other regions are putting significant effort into engagement with specific communities in their work to translate Te Mana o te Wai and how this concept applies to water bodies and freshwater ecosystems in those regions. We ask the Hearing Panel to consider these examples when evaluating the scope of PC1.

## **VI. Conclusion**

24. We ask that the matters relating to freshwater, biodiversity and climate change are removed from PC1, and addressed through further plan changes, once:
- a. A national framework for the pricing of agricultural emissions has been developed and implemented.
  - b. The National Policy Statement Indigenous Biodiversity has been gazetted.
  - c. Further consultation with rural communities has occurred, in relation to provisions related to Te Mana o te Wai as it applies to water bodies and freshwater ecosystems in the region.
25. Thank you for the opportunity to be heard today. I would appreciate any questions you may have.

**Anna Sing**

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<sup>1</sup> [Regional economic activity report \(mbie.govt.nz\)](https://www.mbie.govt.nz)

<sup>2</sup> <https://www.lgc.govt.nz/assets/Uploads/Wellington-Communities-of-Interest-Feb-2016.pdf>

**Senior Regional Policy Advisor**