

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S16.018	Kāpiti Coast District Council	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	We support the policy on the basis it is delivering on a legislative requirement GWRC is responsible for, and no unjustified requirements are proposed for city and district councils.	Retain.		Accept in part
S25.018	Carterton District Council	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	<p>While no methods are included, and the policy applies to regional plans only, this policy appears to set the initial framework for RMA plans targeting agricultural emissions. CDC is concerned with the implications of this, and with the interaction or conflict it might have with other agricultural emission reduction measures.</p> <p>Land use management largely sits with district plans, and therefore it is unclear why this only applies to regional plans, and what flow-on effects there might be for district plans.</p> <p>CDC wishes to understand how this reduction aligns with Government policy in the area. It is unclear how fair and reasonable reductions should be calculated and consistently applied in consenting.</p> <p>CDC requests that this policy is deleted, and the matter reconsidered as part of any future plan change process if that is appropriate.</p>	Delete the policy.		Reject
FS15.001	DairyNZ	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	DairyNZ support the concerns raised around lack of clarity in implementation and lack of clarity and potential misalignment with Government policy.	Allow		Reject
S30.029	Porirua City Council	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	<p>It is unclear why this policy is just focused on avoiding increased emissions, rather than seeking a reduction. If agriculture makes up 34% of greenhouse gas emissions it is not possible to achieve Objective CC.3 without a significant reduction in emissions from this sector.</p> <p>Further, it is not clear why there is a different treatment for agriculture than urban development. This seems inequitable and contrary to the objective CC.2 that seeks that the costs and benefits are shared equally and fairly across the region.</p> <p>The explanation refers to central government taking a lead in emissions reduction through the Emissions Trading Scheme (ETS). Notwithstanding that agriculture is not currently subject to the ETS, the same argument could be made for achieving modal shift in urban environments as the ETS does already apply to petroleum. Explanation outlines that this is a minimum backstop for agricultural emissions. If that is the purpose of these policies, then should that not also apply to transport? Other national directives provide the true levers, and the policy simply provides a backstop of the absolute minimum.</p>	Amend policy so that it provides an equitable approach for sectors in achieving greenhouse gas emissions targets in line with the objectives.		Accept in part
FS28.037	Horticulture New Zealand	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose in part	The exact relief sought is not clear - HortNZ support an approach in PC1 which enables changes that reduce emissions	Disallow	Disallow/ Relief sought is not clear	Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS25.062	Peka Peka Farm Limited	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept in part
FS15.002	DairyNZ	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	The submitter does not recognise that agricultural emissions will be subject to regulation, underlining DairyNZ's concern that any provisions associated with management of agricultural emissions should be deleted until there is clarity of policy settings.	Disallow		Reject
<del>FS25.188</del>	<del>Peka Peka Farm Limited</del>	<del>Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan</del>	<del>Support</del>	<del>The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.</del>	<del>Allow</del>		<del>Awaiting recommendation</del>
S31.016	Robert Anker	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Not Stated / Neutral	There are many situations where a change in agricultural practice will result in both an increase and a decrease in emissions. The focus should be on the net change and not focus on only one side of the equation.	Amend the policy to read:  Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan  Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that result in an increase, in gross <b>net</b> greenhouse gas emissions from agriculture.		Accept in part
S34.036	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose in part	There is no clear evidence that this is a particular issue in the Wellington Region compared to other regions where agricultural emissions are much higher, for example Waikato where the percentage of emissions from agriculture is over 50% according to Stats.NZ regional emissions data.  This policy is identified as a regional function, but method CC.8 (d) (non-regulatory) appears to imply the requirement of farm plans through a resource consent process. The scale and thresholds for farm plan requirements are unclear and it does not appear scale has been considered.  There are many minor changes to land use, or between agricultural activities where the public would be required to undergo an assessment to determine greenhouse gas emissions as a result of this policy. This places an unnecessary burden on the consents and applications. This is likely to disincentivise positive changes in land and be counterproductive to the aim of the objective.  Council does not consider it appropriate to require landowners to go through a form of consent for a land use change which may be positive.  It is noted that work is the Emissions Trading Scheme does not yet cover agriculture and that this does not address land use changes that would traditionally appear to have a greater possibility of emissions, but these could be remedied.  There is no definition of what these activities might be or what tools are available to remedy, measure or monitor the effects that the RPSPC 1 is seeking to address.	Delete the policy in its entirety or clarify that this policy and the method to achieve it are a regional only function.  Review proposal to ensure that this is feasibly able to be implemented and does not place undue obligations on landowners.		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS28.038	Horticulture New Zealand	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	To the extent that the provision is retained, clarity would be improved by linking this to regional functions and ensuring the implementation requirements are clear and feasible	Allow in part		Accept in part
FS15.003	DairyNZ	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	DairyNZ support the concerns raised around implementation and alignment with Government policy. However, we consider the appropriate response is to delete the policy and related provisions.	Allow in part	Delete the policy in it's entirety	Reject
S62.016	Philip Clegg	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	There are many situations where a change in agricultural practice will result in both an increase and a decrease in emissions. The focus should be on the net change, not just on one side of the equation.	Amend as follows:  Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that result in an increase, in gross-net greenhouse gas emissions from agriculture.		Accept in part
S79.022	South Wairarapa District Council	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	<p>Council recognises that equitable reductions of greenhouse emissions are required. The Wairarapa must play its part, as does the agricultural sector. However, the use of 'avoid' is unnecessary and could limit policy options when developing provisions at regional plan level. It is also unclear which only agriculture is targeted to 'avoid' increases, particularly as the emissions from the sector are generally reducing and only a small proportion of overall emissions. In respect of net emissions, the regional inventory shows that (3):</p> <p>[Note: 3 references GWRC, 18 May 2020, Wellington Region Greenhouse Gas Inventory]</p> <ul style="list-style-type: none"> <li>• Wairarapa accounts for 14%</li> <li>• Kapiti accounts for 11%</li> <li>• The urban whaitua (Wellington, Hutt, Porirua) account for 75% of net regional emissions</li> </ul> <p>The policy doesn't reflect the diverse and temporally variable nature of farming systems and could create a 'sinking lid' for farming in the Wairarapa Sub-Region.</p> <p>While no methods are included, and the policy applies to regional plans only, this policy appears to set the initial framework for RMA plans targeting agricultural emissions.</p> <p>SWDC is concerned with the implications of this, and with the interaction or conflict it might have with other agricultural emission reduction measures. SWDC DC wishes to understand how this reduction aligns with Government policy in the area. It is unclear how fair and reasonable reductions should be calculated and consistently applied in consenting.</p> <p>A more fulsome assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where:</p> <ol style="list-style-type: none"> <li>Reductions required by this policy is in excess of government policy; and,</li> <li>That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and,</li> <li>Impacts go beyond only the economic impact of carbon pricing; and,</li> <li>Considers the costs of the implied requirement to supplant farming activities with carbon sequestration.</li> </ol>	<p>Delete Policy CC.5, OR</p> <p>Amend Policy CC.5 as follows:</p> <p>Regional plans shall include objectives, policies, rules and/or methods to avoid that manage changes to land use activities and/or management practices that result in an increase, in gross greenhouse gas emissions from agriculture in order to meet the targets set out in Objective CC.3.</p> <p>Or, similar relief to the same effect;</p> <p>AND;</p> <p>Any consequential amendments to give effect to the relief sought.</p>		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS28.039	Horticulture New Zealand	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	To the extent that the provision is retained, the focus on managing (and as sought in HortNZ's submission enabling change that reduced emissions) rather than a punitive approach	Allow in part	Allow drafting amendments sought that amend 'avoid' to 'manage' and to acknowledge the variation nature of farming systems, and clarity as to the implementation in the policy for consenting	Accept in part
FS15.004	DairyNZ	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	DairyNZ support the concerns raised around implementation and lack of impact analysis.	Allow in part	Delete Policy CC.5	Reject
S95.003	Tony Chad	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	Central government is too slow to rein in carbon emitting agriculture	Require Regional Plans to have Carbon Reduction Plans (CRPs)		Reject
S96.012	Sarah (Dr) Kerkin	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	There are many situations where a change in agricultural practice will result in both an increase and a decrease in emissions. The focus should be on the net change, not just on one side of the equation.	Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that result in an increase, in <b>gross-net</b> greenhouse gas emissions from agriculture.		Accept in part
S102.016	Te Tumu Paeroa   Office of the Māori Trustee	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	Generally supports the regulatory policies in the 'Climate Change' chapter.	Retain as notified.		Accept in part
S128.022	Horticulture New Zealand	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	A nationally consistent approach to phase out is preferred for industrial process heat using coal as a fuel source.  The term 'management practices' may be too specific and granular in scale - reflecting that at an on-farm management scale there may be trade-offs to be made between other outcomes such as those relating to freshwater and biodiversity. The wording 'change in intensity or type of agricultural land use' which is used in Policy CC.13 is considered more appropriate in terms of the level at which a regional plan might regulate.	Amend.  Regional plans shall include objectives, policies, rules and/or methods to: <b>(a) avoid changes in the intensity or type of agricultural land use to land use activities and/or management practices</b> that result in an increase, in gross greenhouse gas emissions from agriculture <b>at the region [or whaitua] scale, and (b) enable land use change in the region to lower emissions rural land uses or land use practices.</b>  OR, in lieu of adding (b), add a new policy  <b>Regional plans shall include objectives, policies, rules and/or methods that recognise the benefits of, and enable rural land use change that contributes to reducing gross greenhouse gas emissions from agriculture.</b>		Accept in part
S131.051	Ātiawa ki Whakarongotai Charitable Trust	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	Ātiawa supports Policy CC.5. It is important that the word avoid has been applied to this policy, this is supported by Ātiawa.	Retain as notified.		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS29.321	Ngā Hapu o Otaki	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access – Support in Principal</p> <p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>	Not stated		No recommendation
S133.038	Muaūpoko Tribal Authority	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR  Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.		Accept in part
FS6.066	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	We oppose this submission because as Muaūpoko claims are inappropriate. This not only causes confusion around which iwi are Tangata Whenua in Te Whanganui a Tara rohe and which iwi to engage with, but also portrays a false perception of who the mana whenua are, which is also inappropriate.	Disallow	We seek that this part of the submission is disallowed.	Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS20.385	Ātiawa ki Whakarongotai Charitable Trust	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	<p>Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muaūpoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.</p>	Disallow	Disallow the whole submission	Accept in part
S136.015	DairyNZ	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	<p>Whilst support the intent to reduce agricultural emissions, concerned about the inconsistencies and duplication of the work underway through the He Waka Eke Noa partnership and the Governments pricing proposal for agricultural greenhouse gas emissions. Developing a regionalised approach to a national issue will lead to misalignment with national policies and instruments, confusion at local level, misallocation of resources and unintended consequences.</p> <p>Another concern is around the issue of emissions leakage. Any shift in production offshore due to domestic and regional policy setting would lead to an increase in global greenhouse gas emissions due to other producers being less efficient.</p>	Delete Objective CC.5 and any related provisions or methods and address the issue through a full review of the RPS.		Reject
FS30.021	Beef + Lamb New Zealand Ltd	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	B+LNZ supports the withdrawal of provisions relating to climate change in order to undertake the necessary analysis, use the most up to date science and be consistent with national direction on climate change and avoid unnecessary duplication.	Allow		Reject
S163.046	Wairarapa Federated Farmers	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	<p>Concerned with the "avoid increase" directive for agricultural greenhouse gas emissions, particularly when other sectors are not subject to similar policies (e.g. industry and transport).</p> <p>Concerned that this policy may result in perverse outcomes, eg, landuse change from pastoral farming to other uses could see a reduction in short-lived agricultural emissions, but an increase in long-lived carbon dioxide emissions. Refer to submission for more detail.</p>	That Policy CC.5 be deleted.		Reject

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS15.005	DairyNZ	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	DairyNZ agrees with the concerns expressed by the submitter, and relief sought.	Allow		Reject
FS7.090	Royal Forest and Bird Protection Society (Forest & Bird)	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow	Disallow whole submission	Accept
FS20.212	Ātiawa ki Whakarongotai Charitable Trust	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Accept
FS29.063	Ngā Hapu o Otaki	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	Section 18, page 4: General Comments – OPPOSE  Section 25, Page 5 Going Forward – OPPOSE  It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.  Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.	Not stated		Accept
FS30.119	Beef + Lamb New Zealand Ltd	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Reject
S165.038	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	Amendments are needed to direct that emissions are not contributed to.  Amendments are also needed to capture a wider range of sectors, such as the waste management sector (methane from landfills) and the expansion of ports (emissions from cruise ships).	Amend as follows:  Regional plans shall include objectives, policies, rules and/or methods to avoid changes to land use activities and/or management practices that <b>contribute to greenhouse gas emissions</b> or result in an increase in gross greenhouse gas emissions <del>from agriculture</del> .		Accept in part
FS17.006	Wellington International Airport Limited ("WIAL")	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	WIAL oppose the relief sought as it does not appropriately provide for the Airport as regionally significant infrastructure. Aircraft emission technology is still evolving, and it would therefore be inappropriate if this policy were extended to air transportation.	Disallow		Reject

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS30.055	Beef + Lamb New Zealand Ltd	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	This policy relies on the actions of rural communities and will significantly affect rural people, land, and businesses. It is inappropriate to include such policies without the necessary engagement with the rural community and ahead of the implementation of national legislation relating to climate change. Furthermore, Plan Change One does not differentiate between short and long-lived gases and is therefore inconsistent with the fundamental concept to New Zealand's approach to climate change.	Disallow		Reject
FS20.070	Ātiawa ki Whakarongotai Charitable Trust	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	Ātiawa support the amendment suggested by Forest and Bird to ensure that any land use change is avoided where it will contribute or result in an increase in gross greenhouse gas emissions.	Allow		Accept in part
FS30.319	Beef + Lamb New Zealand Ltd	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject
S166.045	Masterton District Council	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Not Stated / Neutral	This reads as not allowing land use intensification - is this correct? What is the intent?  We would like a seat at the table for designing this regional plan.  Is this going to trigger farming activity resource consent requirements?  Will all farming activity need to be consented?	 MDC asks that it is part of the design for this plan.  Further clarity required to confirm whether this policy is about not allowing land use intensification and what it means for farming activity.		Unclear
S167.065	Taranaki Whānui	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	We are aware that central government is taking the lead on the policy approach but given the climate crisis and the role agriculture plays, Taranaki Whānui as mana whenua feel strongly that the minimum expectation for this region should aim for reduction.	Amend the policy to read:  Policy CC.5: <b>Make reductions</b> Avoid increases in agricultural greenhouse gas emissions - regional plan		Accept in part
FS15.006	DairyNZ	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	DairyNZ considers this policy should be deleted until there is greater clarity on regulation of emissions at a national level, and a more complete analysis of the proposed provisions is undertaken.	Disallow		Reject
S168.0119	Rangitāne O Wairarapa Inc	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support in part	In principle, Rangitāne o Wairarapa strongly support any measures to require a reduction in agricultural emissions, rather than simply avoiding increased emissions from this sector.	Rangitāne o Wairarapa seek that the Regional Council uses any means available to them, including through the RPS if government policy and legislation allows, to require a reduction in agricultural greenhouse gas emissions.		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS15.007	DairyNZ	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Oppose	DairyNZ considers this policy should be deleted until there is greater clarity on regulation of emissions at a national level, and a more complete analysis of the proposed provisions is undertaken.	Disallow		Reject
FS31.045	Sustainable Wairarapa inc	Policy CC.5: Avoid increases in agricultural greenhouse gas emissions - regional plan	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission. Nga mihi nui Ian Gun	Not stated		Accept in part
S16.026	Kāpiti Coast District Council	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	We note the policy lacks certainty on whether it applies only to regional councils or also city and district councils. We request the policy is amended so it is clear it only applies to regional councils as city and district councils have no statutory functions or powers to manage discharges to air.	Amend Policy CC.13 so it only applies to regional councils.		Reject
S25.036	Carterton District Council	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	The explanation notes that these matters can only be considered in a discharge permit or coastal permit. Therefore, the application of this policy is unclear. If the scope for considering these matters is limited, that should be made clear in the chapeau of the policy.	Amend the policy so that it is clear that these considerations can only apply to discharge permits and coastal permits.		Reject
S30.061	Porirua City Council	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	The policy needs to be specific to regional council as the clauses relate solely to regional council functions in respect to greenhouse gas emissions.	Delete policy, or amend so that it provides clear and appropriate direction to plan users in line with objectives; and/or reword as follows:  When considering an application for a resource consent <b>from the regional council</b> , 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.		Accept

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS25.094	Peka Peka Farm Limited	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept
S31.025	Robert Anker	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Not Stated / Neutral	In focussing on gross emissions GWRC is only looking at part of the picture. There are always two sides to any equation, and it is more than possible to decrease gross emissions by say 10% but at the same time reduce an offsetting factor by say 20%. In that case the gross picture would show an emissions reduction, but the net picture would reveal an increase. Whilst Agriculture is a large numerical component of emissions it is also the sector which has shown one of the largest proportional reductions. It must also be recognised that agriculture provides a very large GDP and export contribution to the economy.	Amend the policy to read: Policy CC.13: Managing agricultural-gross <b>net</b> greenhouse gas emissions - consideration		Reject
S34.037	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose in part	This is a significant change to regional consents and will place onerous requirements on all consents, even those that:  <ul style="list-style-type: none"> <li>• are relatively small</li> <li>• propose a reduction in intensity</li> <li>• result in a less than minor effects or</li> <li>• reduce environmental effects.</li> </ul> <p>Council considers this policy does not consider future growth being required to meet our housing needs and is contrary to the outcomes sought under the NPS-UD. It also does not allow for innovation and reductions in activity without the need for a resource consent.</p>	Delete policy or amend policy to clarify that this relates to regional consents only, and set a threshold for when the provision applies, Review proposal to ensure that this is feasibly able to be implemented and does not place undue obligations on landowners.  Clarify how this will relate to the NPS-HPL.		Accept
FS28.056	Horticulture New Zealand	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	HortNZ support additional clarity as to what consents this applies to and how it will be implemented.	Allow		Accept
S62.024	Philip Clegg	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	As per Policy CC.5. In focussing on gross emissions GWRC is only looking at part of the picture. There are always two sides to any equation, so net emissions is the correct measure here.	Amend as follows:  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 <b>gross net</b> -greenhouse gas emissions as a priority where practicable, and		Reject
S79.041	South Wairarapa District Council	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	The policy's implementation at 'farm level' will result in a sinking lid on agricultural activities and forcing offsets of permanent forest on rural communities. it is not sufficiently robust enough to protect rural environments, communities, and economies from inequitable allocation of the costs of avoiding, remedying or mitigating the effects of climate change.  A more fulsome and robust assessment of economic effects in the s.32 assessment is required to underpin the policy. In particular, where: e. Reductions required by this policy is in excess of government policy; and, f. That adequately assessed the impact on the social, economic and cultural aspects of those costs on communities; and, g. Impacts go beyond only the economic impact of carbon pricing; and, h. Considers the implied requirement to supplant farming activities with carbon sequestration.	Delete Policy CC.13 And,  Establish a policy that: (a) does not result in a sinking lid to agriculture and forces afforestation on rural communities, (b) recognises that some emissions are unavoidable, but also that constant offsetting as a result will remove agricultural uses from the land, (c) local food supply is necessary to reducing greenhouse gas emissions from transport.  Or, similar relief to the same effect; AND;  Any consequential amendments to give effect to the relief sought		Accept

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS28.057	Horticulture New Zealand	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	HortNZ support recognition within the policy of local food supply	Allow		Accept
FS15.013	DairyNZ	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	DairyNZ support the concerns raised around implementation and lack of impact analysis, however we consider the policy and related provisions should be deleted, rather than redrafted.	Allow in part	Delete Policy CC.13	Accept
FS14.028	Masterton District Council	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	Agree with:  It is not sufficiently robust enough to protect rural environments, communities, and economies from inequitable allocation of the costs of avoiding, remedying or mitigating the effects of climate change.	Not stated	Agree with the need to consider solutions that ensures afforestation is not forced on rural communities.	Accept
S96.020	Sarah (Dr) Kerkin	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	As per Policy CC.5. In focussing on gross emissions GWRC is only looking at part of the picture. There are always two sides to any equation, so net emissions is the correct measure here.	Amend as follows:  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 <del>gross</del> net greenhouse gas emissions as a priority where practicable, and		Reject
S102.024	Te Tumu Paeroa   Office of the Māori Trustee	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	Generally supports the policy to be considered in the 'Climate Change' chapter.	Retain as notified.		Reject
S115.062	Hutt City Council	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Not Stated / Neutral	We are neutral towards the overall intent of the policy but request the policy is amended to make clear that it applies to regional consents (which are the only relevant consents to the policy).	Retain Policy CC.13, but amend as follows:  "When considering an application for <b>aregional</b> resource consent, ..."		Reject
S128.038	Horticulture New Zealand	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	As previously noted need to be clear on the definition of 'agricultural greenhouse gas emissions' so that it is clear what will be assessed. This policy does not address the scale at which the assessment occurs;  Seeks this is at the region (or if appropriate, whaitua scale). This is important to retain land flexibility while also driving towards lower emissions.	Amend as follows:  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 <b>agricultural</b> greenhouse gas emissions as a priority where practicable, and (b) where it is not practicable to reduce gross <b>agricultural</b> greenhouse gas emissions, achieving a net reduction in greenhouse gas emissions, and (c) avoiding any increase in gross <b>agricultural</b> greenhouse gas emissions <b>at the region [or whaitua] scale</b> .		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S128.039	Horticulture New Zealand	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	HortNZ also seek a more 'enabling' approach. Climate Change Commission analysis in Ināia tonu nei: a low emissions future for Aotearoa shows that even without new technologies, Aotearoa can reduce agricultural emissions through efficiencies on farms, and by switching some pastoral land to forestry and horticulture. Land use change to horticulture should therefore be provided for. This is important for meeting national direction around highly productive land and also emissions reduction. The policy and/or explanation could add further context to what tools will be used to support assessment.	Add new subclause:(d) providing for land use change to horticulture.		Reject
S128.040	Horticulture New Zealand	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	The policy should have a limited applicability, from when the RMA enables such considerations (noting that this date will have passed once the RPS changes becomes operative) and only until such time as the regional plan specifically addresses greenhouse gas emissions, as the RPS directs.	Add new sentence in the Explanation section <b>This policy does not take effect until November 2022 and will cease to apply once Policy CC.5 has been implemented through the regional plan.</b>		Reject
S131.086	Ātiawa ki Whakarongotai Charitable Trust	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	Ātiawa note that the agricultural sector should be supported to reduce and avoid greenhouse gas emissions from their activities.	Retain as notified.		Reject
FS29.356	Ngā Hapu o Otaki	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access – Support in Principal</p> <p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>	Not stated		No recommendation

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S133.047	Muaūpoko Tribal Authority	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR  Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.		Reject
FS20.394	Ātiawa ki Whakarongotai Charitable Trust	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.	Disallow	Disallow the whole submission	Accept

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S136.016	DairyNZ	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	<p>Acknowledges the changes to the RMA that come into effect in November 2022 which give councils the ability to consider greenhouse gas emissions within the consenting process. The s32 report fails to appropriately justify why regulatory intervention in the form proposed is justified, the economic and social impacts of that intervention, or whether the costs associated with the policy will outweigh the benefits from the regulation.</p> <p>The National Environment Standards for Freshwater require any intensification of land use over 10ha to gain a resource consent. Greenhouse gases could form a part of the considerations for consents triggered by this rule. However due to the lack of detail on how the assessment in a consenting process will be undertaken, concerned Policy CC.13 will result in unattended consequences and inconsistency with the national approach to reduce agricultural greenhouse gases. It is unclear what information will be accepted by council for consents and what granularity of greenhouse gases emissions changes will be impacted.</p> <p>Further work needs to be done to outline the details of how this policy will be implemented including the impact on farmers and what information will be accepted by councils in the consenting process.</p> <p>Concerned that Policy CC.13 only focuses on penalising increases and not rewarding reductions which farmers may implement for their own motivations. Support this policy being used as a carrot not just a stick.</p>	Delete Policy CC.13 and address the issue through a full review of the RPS.		Accept
FS30.022	Beef + Lamb New Zealand Ltd	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	B+LNZ supports the withdrawal of provisions relating to climate change in order to undertake the necessary analysis, use the most up to date science and be consistent with national direction on climate change and avoid unnecessary duplication.	Allow		Accept
FS28.058	Horticulture New Zealand	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	HortNZ support additional clarity as to what consents this applies to and how it will be implemented and the RPS taking an enabling, as opposed to punitive approach (i.e support the policy being used as a carrot not just a stick)	Allow in part	Allow amendments that add clarity and enable change	Accept in part
S140.063	Wellington City Council (WCC)	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	As district plans may have rules that manage other aspects of agricultural land use, this policy should be clear it applies to discharge permits only.	Amend with this text, or similar: When considering an application for a <b>discharge permit resource consent</b> , associated with a change in intensity or type of agricultural land use, particular regard shall be given to:		Reject
S163.067	Wairarapa Federated Farmers	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	<p>Reasons as set out in respect of the proposed climate change objectives and Policy CC.5</p> <p>In addition, the directive in Policy CC.9 is expressed in terms of optimising planned developments in a way that contributes to reducing emissions (in respect of transport infrastructure); and Policy 2 is expressed in terms of support (in respect of industry); we are not clear why Policy CC.13 is expressed in different terms.</p>	That Policy CC.13 be deleted		Accept
FS7.110	Royal Forest and Bird Protection Society (Forest & Bird)	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow	Disallow whole submission	Reject

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS20.232	Ātiawa ki Whakarongotai Charitable Trust	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Reject
FS29.083	Ngā Hapu o Otaki	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	Section 18, page 4: General Comments – OPPOSE  Section 25, Page 5 Going Forward – OPPOSE  It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.  Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.	Not stated		Reject
FS30.139	Beef + Lamb New Zealand Ltd	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Accept
S165.067	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	Amendments required to require decisionmakers give more weight to the listed matters, and that the policy links to achieving the specific reductions sought in Objective CC.3.	Amend as follows:  When considering an application for a resource consent, associated with a change in intensity or type of agricultural land use, <del>particular regard shall be given to</del> <b>ensure:</b>  (a) <del>reducing</del> gross greenhouse gas emissions are <del>reduced in</del> <b>accordance with Objective CC.3</b> as a priority <del>where practicable</del> , and  (b) where it is not practicable to reduce gross greenhouse gas emissions, achieving a net reduction in greenhouse gas emissions, and  (c) <del>avoiding any increase in gross greenhouse gas emissions is</del> <b>avoided.</b>		Reject

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS30.319	Beef + Lamb New Zealand Ltd	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Accept
S166.052	Masterton District Council	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Not Stated / Neutral	MDC enquire whether the intent of this policy to limit dairy farming intensification? If so, how are these communities going to be supported?	Clarifications.  More clarity required regarding the policy intent with regard to dairy farming intensification.		Accept in part
S167.0102	Taranaki Whānui	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support in part	We are aware that central government is taking the lead on the policy approach but given the climate crisis and the role agriculture plays, Taranaki Whānui as mana whenua feel strongly that the minimum expectation for this region should aim for reduction.	Amend policy to provide for emissions reduction:  Policy CC.13: <b>Managing Reducing</b> agricultural gross greenhouse gas emissions - consideration		Reject
S168.0128	Rangitāne O Wairarapa Inc	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	Rangitāne o Wairarapa support the prioritisation in this policy that gross greenhouse gas emissions from agricultural land use are reduced as the first priority. However, we remain concerned that 'where practicable' weakens the strength of this policy and may not be sufficient to address the reductions needed in this sector.	The policy should be amended so that the term 'where practicable' is properly described within the policy and the circumstances in which actions must be regarded as being 'practicable' are stated.		Reject
FS31.055	Sustainable Wairarapa inc	Policy CC.13: Managing agricultural gross greenhouse gas emissions - consideration	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission. Nga mihi nui lan Gun	Not stated		Reject

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S34.041	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Oppose in part	<p>This policy stretches the legislative powers and authority of territorial authorities and Council considers this policy should be a regional council function only.</p> <p>It is unclear what nature-based solutions would mean in a rural context, or how this would be achieved in a non-regulatory way. This could place additional burden without required financial support.</p> <p>The policy also does not consider how benefits would be apportioned when something is generated or demanded in an urban and rural area.</p>	Amend to clarify as a regional council function only, what is meant and review to ensure that this can be achieved.		Reject
S128.050	Horticulture New Zealand	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	Support improving rural resilience to climate change, including in promoting and supporting land uses that will reduce gross greenhouse gas emissions	Retain as notified.		Accept
S133.049	Muaūpoko Tribal Authority	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	Supports the inclusion of additional policy that addresses climate change and climate change impacts across the region.	Retain as notified. OR  Alternative relief that maybe necessary or appropriate to ensure Muaūpoko's connection to Te- Whanganui-a-Tarais recognised.		Accept
FS20.396	Ātiawa ki Whakarongotai Charitable Trust	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Oppose	<p>Ātiawa vehemently oppose the submission and claims made by Muaūpoko Tribal Authority. The assertions made by Muāupoko Tribal Authority are categorically incorrect and highly offensive to Ātiawa ki Whakarongotai. While Muaūpoko may have historical associations with Te Whanganui-a-Tara and Kāpiti. These associations are recognised as historical only. Ātiawa refer to the evidence provided by Ngārongo Iwikatea Nicholson in support of Ngāti Toarangatira's claims which were upheld and settled by the Crown. Pages 26-34 sets out the extinguishment of Muaūpoko rights in our rohe. From both a tikanga Māori perspective and a Crown law perspective, Muaūpoko do not hold mana whenua (including for the purposes of the Resource Management Act). There is therefore no basis for Muaūpoko Tribal Authority to be recognised as being kaitiaki in the rohe; to do so would be incomprehensible and irreconcilable to Ātiawa, and more generally an affront to tikanga Māori. Muaūpoko Tribal Authority have cited Te Kāhui Māngai mapping as evidence of the spatial extent that they exercise kaitiakitanga. This in itself evidences the lack of basis to their claims, in that Te Kāhui Māngai map simply reflects claims made by Māori groups, and from our previous inquiry to Te Puni Kōkiri who are responsible for this map, we learned that Muaūpoko Tribal Authority included that spatial extent in their Agreement in Principle. Agreements in Principle provide claimants the opportunity to set out everything that a claimant wants from the Crown. They have no legal effect and are therefore not legally recognised. We strongly advise the Council to remain conscious that it is not appropriate for regional planning processes to be exploited in the manner suggested by the Muaūpoko Tribal Authority, that dealing with the false claims of groups like these must be left to the Crown, and that settlements must not pre-empted. Whilst Muaūpoko Tribal Authority may wish to seek out new territories through online maps, this is not of course how mana whenua is gained or held. We remain as ahi kā and mana whenua on the land, as we have undisturbed for over 198 years.</p>	Disallow	Disallow the whole submission	Accept in part
S144.010	Sustainable Wairarapa Inc	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	Important that knowledge of natural hazards is widespread	Retain as notified.		Accept

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S147.076	Wellington Fish and Game Council	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	Necessary to give effect to the NPS-FM.	Retain as notified.		Accept
FS19.140	Wellington Water Ltd ("Wellington Water")	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow		Reject
FS30.245	Beef + Lamb New Zealand Ltd	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	That the submission be disallowed with the exception of 147.007	Reject
S163.080	Wairarapa Federated Farmers	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Oppose	<p>Defer to full review of the RPS in 2024</p> <p>The proposed over-arching Objective A and Objective B are intended to provide a more concrete pathway towards a similar result.</p>	<p>That Policy CC.15 be deleted</p> <p>Delete the FW icon</p>		Reject
FS7.123	Royal Forest and Bird Protection Society (Forest & Bird)	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow	Disallow whole submission	Accept
FS20.245	Ātiawa ki Whakarongotai Charitable Trust	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Accept

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS29.096	Ngā Hapu o Otaki	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Oppose	<p>Section 18, page 4: General Comments – OPPOSE</p> <p>Section 25, Page 5 Going Forward – OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>	Not stated		Accept
FS30.152	Beef + Lamb New Zealand Ltd	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Reject
S165.082	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support		Retain		Accept
FS30.319	Beef + Lamb New Zealand Ltd	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject
S166.054	Masterton District Council	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Not Stated / Neutral	Is the intent of this policy to limit dairy farming intensification? If so, how are these communities going to be supported?	MDC requests involvement in the development of any RPS related policies about rural resilience to climate change.		Accept in part
S170.065	Te Rūnanga o Toa Rangatira	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Not Stated / Neutral	<p>Policy CC.15 Reducing agricultural gross biogenic methane emissions - consideration</p> <p>Does this policy cover methane emissions from landfills?</p>	<p>Policy CC.15 Reducing agricultural gross biogenic methane emissions - consideration</p> <p>Does this policy cover methane emissions from landfills?</p>		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS29.179	Ngā Hapu o Otaki	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making – Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 – Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p> <p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>	Not stated		No recommendation
S30.0125	Porirua City Council	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support in part	These matters align with the Regional Council's functions under s30 with regard to discharges to air and water.	Amend policy to clarify the regional council is responsible for supporting rural communities.		Reject
FS25.043	Peka Peka Farm Limited	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Reject
S131.0107	Ātiawa ki Whakarongotai Charitable Trust	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	In principle Ātiawa supports the intent of this policy.	Retain as notified.		Accept

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS29.222	Ngā Hapu o Otaki	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access – Support in Principal</p> <p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>	Not stated		No recommendation
S167.0125	Taranaki Whānui	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	<p>We (Taranaki Whānui) are aware that central government is taking the lead on the policy approach but given the climate crisis and the role agriculture plays, Taranaki Whānui as mana whenua feel strongly that the minimum expectation for this region should aim for reduction.</p> <p>Taranaki Whānui supports the new Policy CC.15. In particular the promotion and support of gross greenhouse gas emission reduction.</p>	Retain as notified.		Accept
S168.0131	Rangitāne O Wairarapa Inc	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	<p>Rangitāne o Wairarapa strongly support the inclusion of nature-based solutions in the promotion and support for land management practices and / or land uses that improve climate change resilience. Provision of information on climate change data and projections to rural communities, and promotion and support for land management and use practices that reduce GHG emissions is also supported.</p>	Retain as notified.		Accept

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS31.059	Sustainable Wairarapa inc	Policy CC.15: Improve rural resilience to climate change - non-regulatory	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission. Nga mihi nui Ian Gun	Not stated		Accept
S102.034	Te Tumu Paeroa   Office of the Māori Trustee	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.		Accept in part
S128.058	Horticulture New Zealand	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	Agree it is appropriate to review the approach to reducing agricultural greenhouse gas emissions, to align with national direction as there has been significant work undertaken through partnerships such as He Waka Eke Noa.	Retain as notified.		Accept in part
S136.020	DairyNZ	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Oppose	Opposes Method CC.5 outright for inclusion through PC1. There are already existing efforts underway to reduce agricultural greenhouse gas emissions. Deferral of this consideration until the full RPS review will enable alignment with the Primary Sector Climate Action Partnership between Government, the Primary Sector, and iwi/Māori - He Waka Eke Noa (HWEN).  Through the full RPS review process will be able to leverage its existing rural networks, databases and environmental expertise that support change and improved management practices at a farm level to achieve the ambitious approach to climate change mitigation.	Delete Method CC.5 and address the issue through a full review of the RPS.	Awaiting recommendation	Reject
FS30.023	Beef + Lamb New Zealand Ltd	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	B+LNZ supports the withdrawal of provisions relating to climate change in order to undertake the necessary analysis, use the most up to date science and be consistent with national direction on climate change and avoid unnecessary duplication.	Allow		Reject

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S163.096	Wairarapa Federated Farmers	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Oppose	Defer to the 2024 RPS review  Concern that this method is restricted to just one sector - not all sectors.	That Method CC.5 be deleted.		Reject
FS7.139	Royal Forest and Bird Protection Society (Forest & Bird)	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Oppose	It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.	Disallow	Disallow whole submission	Accept
FS20.261	Ātiawa ki Whakarongotai Charitable Trust	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Oppose	Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Accept
FS29.112	Ngā Hapu o Otaki	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Oppose	Section 18, page 4: General Comments – OPPOSE  Section 25, Page 5 Going Forward – OPPOSE  It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.  Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.	Not stated		Accept
FS30.168	Beef + Lamb New Zealand Ltd	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Reject
S166.075	Masterton District Council	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Not Stated / Neutral		MDC requests to be part of the design for this.		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S168.020	Rangitāne O Wairarapa Inc	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Not Stated / Neutral	Rangitāne o Wairarapa are concerned at the urgency at which greenhouse gas emission reductions must be achieved. We seek that the commitment in the section 32 report and Method CC.5 to review the policy package of provisions in the Plan Change which address climate change and agriculture by 31 December 2024 is upheld, in order to provide for the strongest direction possible to reduce agricultural emissions. 'Hold the line' is an inadequate response to address the climate emergency. We also remind you that indigenous solutions are key and have proven to be massive contributors to reducing and minimising climate change.	We therefore seek that tangata whenua are co-governing, co-managing and co-designing solutions for our future with our communities.		Accept in part
FS14.013	Masterton District Council	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support		Not stated	Agrees with RoW decision requested seeking that tangata whenua are co-governing, co-managing and co-designing solutions for our future with our communities.	Accept in part
FS31.131	Sustainable Wairarapa inc	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission. Nga mihi nui lan Gun	Not stated		Accept in part
FS30.470	Beef +Lamb New Zealand	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Oppose	B+LNZ generally oppose submissions that seek further changes or support for provisions relating to climate change and agriculture before national legislation is finalised; implementing provisions of the NPSFM-2020 before the necessary engagement has been completed; and pre-empting the NPS-IB before it has been gazetted. B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow	That these submissions be disallowed.	Reject

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S170.071	Te Rūnanga o Toa Rangatira	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Not Stated / Neutral	Under the central government direction, how can Regional Councils achieve emission reductions from agriculture? Is this method, just limited to reviewing the regional response, which means reviewing land use emissions impact? It is not clear.	Clarify how this will achieve emissions reductions from agriculture.		Accept in part
FS29.185	Ngā Hapu o Otaki		Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>Objective 3: Lack of mana whenua / tangata whenua involvement in decision making – Support in principal</p> <p>FW Kaitiakitanga O1, O2, O3 – Support in principal</p> <p>Wai Mate O1,O2,O3 - Support in principal</p> <p>Climate Change and Freshwater objectives, CCFW-01, CCFW-02, CCFW-03, CCFW-04, CCFW-05, CCFW-06</p> <p>This submission appropriately articulates Kaitiakitanga, FW objectives regarding Climate Change, Wai mate, Wai ora and the lack of provisions to see balanced decision making between Treaty Partners. Ngā Hapu o Otaki support Te Runanga o Toa Rangatira expression and wish to speak further to such views during the hearing process. We have serious concerns for the degradation of our taonga, in particular our wai. This combined with the projected growth the next generation will see means manawhenua resilience and agility to climate grief and environmental decline is paramount. Ngā Hapu o Otaki seek to support our whanaunga and other Manawhenua groups to build the provisions we will need to solidify our Tino Rangatiratanga and ensure our intergenerational prosperity.</p>	Not stated		No recommendation
S131.0167	Ātiawa ki Whakarongotai Charitable Trust	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	Ātiawa support Method CC.5, particularly given the high emissions produced from the agricultural industry.	Retain as notified.		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS29.287	Ngā Hapu o Otaki	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access – Support in Principal</p> <p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>	Not stated		No recommendation
S165.0112	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support in part	This approach should not be limited to agriculture. This method should therefore be amended.	<p>Amend as follows:</p> <p>Monitor changes in agricultural-land use and land management practices and review the regional policy approach by 31 December 2024, responding to any predicted changes in greenhouse gas emissions from the agricultural sector in the Wellington Region and any new national policy direction.</p>		Reject
FS30.319	Beef + Lamb New Zealand Ltd	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Accept

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S167.0169	Taranaki Whānui	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	<p>Taranaki Whānui are aware that central government is taking the lead on the policy approach.</p> <p>Taranaki Whānui support the need for monitoring and review - and reducing the damage done by agriculture.</p> <p>Taranaki Whānui want to signal our support for stronger direction on agricultural emission reduction.</p>	Retain as notified.		Accept in part
S168.0120	Rangitāne O Wairarapa Inc	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support in part	Support the commitment in Method CC.5 but seek this is strengthened to make reference to notifying a plan change, if the review finds that changes to the provisions in the RPS and Regional Plan are required. support the commitment in the s32 Report (i.e. Method CC.5): "The proposed package includes provisions to review the regional policy approach by 31 December 2024 (the date for notification of a full RPS review) to respond to any predicted changes in greenhouse gas emissions from the agricultural sector in the region and any new national direction" (pg 135).	Amend Method CC.5 to state that a plan change to the RPS and Regional Plan will be notified where changes are required to the provisions. Retain method CC.5 to review this provision and subsequently to notify a plan change if necessary, by 31 December 2024.		Accept in part
FS31.047	Sustainable Wairarapa inc	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	<p>Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032.</p> <p>Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission. Nga mihi nui lan Gun</p>	Not stated		Accept in part
S168.0129	Rangitāne O Wairarapa Inc	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	We support the commitment in the s32 Report (i.e. Method CC.5): "The proposed package includes provisions to review the regional policy approach by 31 December 2024 (the date for notification of a full RPS review) to respond to any predicted changes in greenhouse gas emissions from the agricultural sector in the region and any new national direction" (pg 135).	Rangitāne o Wairarapa seek that the commitment in the Section 32 Report and in Method CC.5 to review this provision and subsequently to notify a plan change if necessary, by 31 December 2024, is upheld.		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS31.056	Sustainable Wairarapa inc	Method CC.5: Review regional response to reducing agricultural greenhouse gas emissions	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission. Nga mihi nui Ian Gun	Not stated		Accept in part
S79.052	South Wairarapa District Council	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support in part	The method is appropriate but it should include partnering with appropriate stakeholders.	Amend the chapeau of Policy CC.8 to include that this method is undertaken in conjunction with stakeholders.		Accept
FS28.091	Horticulture New Zealand	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	Support this method being undertaken in conjunction with stakeholders	Allow	Allow relief	Accept
FS14.045	Masterton District Council	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support in part	Agree with: The method is appropriate but it should include partnering with appropriate stakeholders.	Not stated	Agree with relief sought: Amend the chapeau of Policy CC.8 to include that this method is undertaken in conjunction with stakeholders.	Accept
S102.037	Te Tumu Paeroa   Office of the Māori Trustee	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	Generally supports the methods to implement for the 'Climate Change' chapter.	Retain as notified.		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S123.013	Peter Thompson	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	This support is very necessary to assisting a transition to a low emission environment	Retain as notified.		Accept in part
S128.061	Horticulture New Zealand	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support in part	Support the general intent, land use change to horticulture is also an option for reducing emissions - amendment is sought to (c) to reflect this.	Amend as follows:(c) promoting and supporting actions to reduce agricultural gross greenhouse gas emissions and/or increase climate resilience, <b>including options for land use change to horticulture</b>		Reject
FS15.014	DairyNZ	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Oppose in part	DairyNZ agrees with the proposal to develop a nonregulatory programme to support farmer decision making around transitioning to alternative land uses  However, we consider any provisions related to climate change emissions directed towards to the agricultural sector should be deleted and revisited once there is greater clarity around national direction, and there has been more appropriate analysis of how the PRPS should respond to this.	Disallow		Accept
S137.011	Greater Wellington Regional Council (GWRC)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support in part	Clarify the need to resource and implement the climate change extension programme.	By June 2024, develop <b>and implement</b> a targeted climate change extension programme to actively promote and support changes to reduce agricultural greenhouse gas emissions and increase rural land use resilience to climate change, including by:	Awaiting recommendation	Accept
FS30.028	Beef + Lamb New Zealand Ltd	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Oppose	B+LNZ submission sought the withdrawal of climate change provisions and redrafting to align with national legislation, importantly distinguishing between the emissions reductions/warming impacts of short lived and long-lived emissions.	Disallow	That this submission be disallowed, and climate change provisions are redrafted to align with national direction and once national policy has landed for consistency and to avoid unnecessary duplication.	Reject
S144.018	Sustainable Wairarapa Inc	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	This support is very necessary to assisting a transition to a low emission environment	Retain as notified.	Awaiting recommendation	Accept in part
S166.077	Masterton District Council	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support in part	Supportive in principle but need to know more about how this will work in with central government and primary industry initiatives in this area.	Retain as notified. However: More information required for this method.		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S131.0144	Ātiawa ki Whakarongotai Charitable Trust	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	Ātiawa are supportive of actions to actively promote and support changes to reduce agricultural greenhouse gas emissions and increase rural land use resilience to climate change.	Retain as notified.		Accept in part
FS29.263	Ngā Hapu o Otaki	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	<p>Co -design under a treaty house model is about shaping plans and resource management avenues alongside manawhenua that appropriately recognise the intergenerational prosperity of the uri of Ngā Hapu o Otaki and the wider community.</p> <p>There are ongoing concerns Ngā Hapu o Otaki maintain with GWRC in regard to the policies addressing Co-governance, Co-management, Co-leadership and Co-collabroative operational processes.</p> <p>This submission goes to great length to define where and how further considerations can be made recognising the interconnected nature of matauranga maori, the inequitable impact environmental decline will have on mana whenua/tangata whenua and offers insight to the intuitive and inherent awareness manawhenua need to maintain to ensure our intergenerational survival and prosperity.</p> <p>3.4 Freshwater including Public Access – Support in Principal</p> <p>3.6 Indigenous Ecosystems – Support in Principal</p> <p>3.9 Regional Form, Design and Function – Support in Principal</p> <p>Ātiawa views regarding Freshwater, indigenous ecosystems and Regional design and function resonate with insights Ngā Hapu o Otaki maintain. Ngā Hapu o Otaki would like opportunity to speak further to such views during the hearing process. We share Ātiawas concerns for Mātauranga Māori as a foundation for equitable interchange of decision making. Their concerns regarding intensification and the further degradation of taonga across our coastline rings true to the ongoing journey we are on as manawhenua facing intense growth for the coming generation. We seek to join the conversation and endorse provisions that will see our whanaunga and other manawhenua groups recognise their environmental resilience and the cultural agility our shared whakapapa offers.</p>	Not stated		No recommendation
S147.0103	Wellington Fish and Game Council	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	Necessary to implement the NPS-FM.	Retain as notified.	Awaiting recommendation	Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS19.167	Wellington Water Ltd ("Wellington Water")	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Oppose	<p>It is unnecessary and redundant to recreate NPSFM policies within the RPS.</p> <p>Most of the amendments sought do not in any event properly reflect the NPSFM. In particular, they do not accurately reflect the proviso to Policy 7, the requirements of clause 3.22, the limitation of Policy 10 to trout and salmon only, and the subservience of Policy 10 to Policy 9.</p> <p>Some of the amendments attempt to address matters that are already adequately covered by extant provisions or PC1 as notified.</p> <p>Some of the amendments undermine the more detailed content of PC1.</p>	Disallow		Reject
FS30.272	Beef + Lamb New Zealand Ltd	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Oppose	<p>B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.</p>	Disallow	That the submission be disallowed with the exception of 147.007	Reject
S163.0102	Wairarapa Federated Farmers	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Oppose	<p>Defer to the full review of the RPS in 2024.</p> <p>General support for the intent but proposing an RPS Change One method is not a pre-condition for getting the job done.</p>	<p>That Method CC.8 be deleted.</p> <p>Delete the FW icon</p>		Reject
FS7.042	Royal Forest and Bird Protection Society (Forest & Bird)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Oppose	<p>It is completely appropriate to include climate change, biodiversity and freshwater provisions in the plan change. This plan change creates efficiency by considering multiple policy directives from central government. The amendments sought by Federated Farmers fail to give effect to the NPSFM, the NPS for Indigenous Biodiversity, for which there is an exposure draft and the final version is due out this month, and do not achieve the purpose of the RMA or the Climate Change Response (Zero Carbon) Amendment Act 2019.</p>	Disallow	Disallow whole submission	Accept
FS20.164	Ātiawa ki Whakarongotai Charitable Trust	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Oppose	<p>Ātiawa oppose the entire submission by Wairarapa Federated Farmers. The relief sought by Federated Farmers is to effectively delete the entire proposed plan change (except for submission points S163.083, S163.084). The basis for deleting the proposed plan change is to delay decision-making. Ātiawa do not accept that delaying responding to national direction is an appropriate course of action, and will further compound environmental and resource management issues.</p>	Disallow	Disallow the entire submission by Wairarapa Federated Farmers.	Accept

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS29.015	Ngā Hapu o Otaki	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Oppose	<p>Section 18, page 4: General Comments – OPPOSE</p> <p>Section 25, Page 5 Going Forward – OPPOSE</p> <p>It is disheartening to see that Wairarapa Federated Farmers aren't capable of recognizing the obligations GWRC must maintain with Treaty Partners. It must be understood that Manawhenua are not simply 'groups of people' but a representation of the signatories that signed the Treaty of Waitangi and the original kaitiaki and custodians of the taonga in question when considering how these plan changes are implemented.</p> <p>Wairarapa Federated Farmers indicate a lack of awareness to the value of manawhenua engagement. Their stated 'aspirations of delivering environmental improvements alongside a thriving bio-economy' aren't feasible without considering the intergenerational insight and technical direction that only Mātauranga Māori can offer.</p>	Not stated		Accept
FS30.071	Beef + Lamb New Zealand Ltd	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	B+LNZ agree that the scope of RPS PC1 should be restricted to those changes necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. Where alternative relief is provided, B+LNZ generally support this relief.	Allow		Reject
S165.0118	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	The policy basis for this method (i.e. policy CC. 5) should be broader to capture other industries. As such, a similar method of support for other industries may be appropriate.	<p>Retain.</p> <p>Consider including a similar method for supporting other industries to transition to low/zero carbon.</p>		Accept in part
FS30.319	Beef + Lamb New Zealand Ltd	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Reject
S167.0176	Taranaki Whānui	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	Taranaki Whānui support the principle of this new method. We especially support a programme that promotes a reduction of emissions by the agricultural sector.	Retain as notified.		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S168.0154	Rangitāne O Wairarapa Inc	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support in part	Rangitāne o Wairarapa support Method CC.8 in part, to develop a target extension programme to reduce agricultural greenhouse gas emissions and increase rural land use resilience to climate change. However, we seek that incentives to support change are developed and included as part of this programme.	Amend the method to include the development of incentives to reduce agricultural submissions and increase rural land use resilience, as part of this programme.		Reject
FS31.083	Sustainable Wairarapa inc	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission. Nga mihi nui lan Gun	Not stated		Reject
S168.0188	Rangitāne O Wairarapa Inc	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support in part	Inclusion of this Method is supported. While the provisions relating to identifying appropriate areas and species for tree planting / natural regeneration in farm plans is supported, the clause should express a preference for native species of vegetation for planting / natural regeneration.  Provision (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 is supported.	Amend clause (d) of the method to include a preference for native species of vegetation for planting / natural regeneration in farm plans as part of implementing the regional spatial forest plan.		Reject
FS31.118	Sustainable Wairarapa inc	Method CC.8: Programme to support low-emissions and climate-resilient agriculture-non-regulatory methods	Support	Kia ora koutou, My name is Ian Gunn, Secretary Sustainable Wairarapa inc. contact # 021567134, address 4B McKay Street, Paraparaumu Beach 5032. Firstly we'd like to state the time frame provided to peruse over 900 pages of submissions is in our opinion an abuse of process. The benefit of further submissions is for you the council to listen and hear the views of its ratepayers. The timeframe in our case does not allow a rigorous review of the original submissions to council. On top of this we are a week before Christmas- a very busy and chaotic time for most members of the community. It is highly likely that the majority of staff will take leave over the Christmas break so analysis of any further submissions will not occur until late January 2023-so why the short period to respond. While there is due process there is also good practise your management of the further submissions fails the good practise model. As a consequence we would like you to note Sustainable Wairarapa's strong support of the original submissions lodged with council by the two Wairarapa Iwi-Ngati Kahungunu and Rangitane. Its clear that there is a poor understanding of nature based solutions this term needs further explanation. Sustainable Wairarapa acknowledges that while nature based solutions offer a wide variety of options its not the only solution. We are heartened by the widespread support for the original document. Thanks for an opportunity to make a further submission. Nga mihi nui lan Gun	Not stated		Reject

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S11.023	Outdoor Bliss Heather Blissett	General comments - overall	Support in part	Can we remove all the words information, promote, support and encourage to an action. We have been doing this for years and now is time for action. Still too passive. My local Council have been ignoring your information, promotion, support and encouragement to date. The document is far too passive.	Use stronger language throughout the document: Replace "information", "promote", "support" and "encourage" with "implement" or "incentivize" (or better word), Replace "consideration" with "essential". Replace "non-regulatory" with "regulatory".		Accept in part
S16.097	Kāpiti Coast District Council	General comments - overall	Support in part	Objectives : Many objectives are not drafted clearly with regard to what outcome is sought, and some do not appear to be achievable within the scope of a regional policy statement.	Ensure all objectives are specific, state what is to be achieved where and when, clearly relate to (or state) an issue, and can be determined through implementation and monitoring whether the objectives have been met. Delete all objectives that are not achievable within the scope of a regional policy statement (with respect to legal justification, and the effectiveness and efficiency in light of alternative methods outside of the regional policy statement).		Accept in part
S16.0100	Kāpiti Coast District Council	General comments - overall	Oppose	Inappropriate use of verbs within objectives and policies: There are a number of examples throughout RPS Change 1 that proposes the use of verbs within objectives and policies that do not align with the RMA or relevant higher-level statutory planning documents. Council submits that the use of the correct verb in each instance is of critical importance due to their specific meaning and requirements for implementation that have been determined through case law. Council has not identified all instances of the use of inappropriate verbs, but this submission requests all verbs are reviewed and replaced where appropriate.	All verbs used in objectives and policies are reviewed and replaced with the appropriate verb in accordance with the RMA and relevant higher-level statutory planning documents.		Accept in part
S16.0102	Kāpiti Coast District Council	General comments - overall	Oppose	Use of 'and/or' throughout RPS Change 1: We note the use of and/or generally means a choice can be made. This is an issue across RPS Change 1 where it appears there is uncertainty as to whether there should be a choice or not. We request all instances of 'and / or' are reviewed and 'and' or 'or' are specifically used where appropriate.	All instances of and/or are reviewed and 'and' or 'or' are specifically used where appropriate.		Accept in part
S16.0103	Kāpiti Coast District Council	General comments - overall	Oppose	Plan-wide provisions that are based on the misconception that district plan content, decision making on resource consents or notices of requirement by the Council are not limited by legislation: There are many examples in the plan change where there is a misconception that a district plan can require certain actions or require specific changes in behaviour. There are many free-market factors that district plans cannot regulate, and therefore should be pursued by the regional council via non-regulatory methods. Examples include but are not limited to: • Emission of greenhouse gases. • Transportation mode choice. • Restoration and enhancement activities. Nature based solutions	Delete all district plan requirements where the proposed methods (including the consideration of RPS policies, district plan making, resource consents, and notices of requirement) attempt to regulate free-market activities and behaviours of individuals that are not clearly supported by the RMA or a higher-level statutory planning document.		Accept in part
S16.0104	Kāpiti Coast District Council	General comments - overall	Oppose	Explanations to objectives and policies: There are many examples where explanations to objectives and policies either contain information that is unnecessary, or content that should be included in the relevant objective or policy itself. Explanations can provide useful context in some situations, but as they have no legal status under the RMA they should be used sparingly and appropriately.	Review and amend all explanations to objectives and policies to: a. Delete those that are unnecessary; and b) Delete text that should have been included in the relevant objective or policy		Accept in part
S16.0106	Kāpiti Coast District Council	General comments - overall	Oppose	Provisions that are not supported by the RMA, statutory planning documents, or an evidence base that supports and justifies the proposed provisions: We have been unable to find an evidence base supporting and justifying a number of provisions in the plan change. The section 32 evaluation does not assist us in understanding the resource management basis or evidence base for many of the proposed provisions - particularly where a regulatory method is proposed.	Delete all provisions that are not supported by the RMA, statutory planning documents, or a robust evidence base that supports and justifies their inclusion in a regional policy statement.		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S30.0116	Porirua City Council	General comments - overall	Not Stated / Neutral	The real value of regional policy statements is to provide policy direction that either does not exist at a national level or exists at a national level but needs to be articulated at a regional level. Council is concerned about the many provisions in Proposed Change 1 that either duplicate or are inconsistent with matters now comprehensively addressed by national direction. In some instances, they duplicate national direction without giving specific guidance in a Wellington Region context.	Greater alignment with National Direction		Accept in part
FS25.033	Peka Peka Farm Limited	General comments - overall	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept in part
FS25.159	Peka Peka Farm Limited	General comments - overall	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Accept in part
S30.0117	Porirua City Council	General comments - overall	Not Stated / Neutral	Council has concerns over jurisdictional issues, particularly in relation to the discharge of contaminants to air, land and water; and the management of fresh waterbodies. We consider that various provisions are ultra vires in terms of our respective functions under sections 30 and 31 of the RMA. Further, territorial authorities do not have the capacity or capability to undertake these functions. Many of the provisions as required would require a transfer of powers from regional councils to territorial authorities.	Query in relation to s30 and s31 functions, RMA, 1991		Accept in part
FS25.034	Peka Peka Farm Limited	General comments - overall	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Reject
S30.0120	Porirua City Council	General comments - overall	Not Stated / Neutral	Not stated	In addition to the relief sought as set out in our submission, as outlined above Council considers that the best course of action would be to withdraw much of Proposed Change 1, or otherwise work with councils on a variation to significantly amend most of its contents.		Accept in part
FS25.038	Peka Peka Farm Limited	General comments - overall	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Reject
S34.0111	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose in part	Council has not: • undertaken a complete check or whether detailed relief sought in this submission, could be/are partly or fully addressed by other provisions in RPS PC1 • undertaken a full review of background documents and higher order amendments supporting or relating to these provisions • identified all consequential amendments needed in response to relief sought on specific provisions or that might address our concerns	Seeks any and all other amendments that will address the relief sought.		Accept in part
S34.0113	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose in part	Use of negative rather than neutral language in issue statements: Council is concerned the issues are worded in strong negative language in the absence of any evidence, that Council is aware of, to support this negatively framed position, and these set a negative presumption and tone for the proposed cascading provisions.	Council requests the issues are amended to be written in neutral language with a balanced approach to the issue.		Accept in part
S34.0115	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose	Requirements for district plans to include provisions for regional council functions or that extend beyond the ability of regional council to direct: Council has significant concerns that many of the proposed provisions attempt to require city and district councils to carry out some of the functions of regional councils or require Council to address resource management issues in its district plan that are beyond its statutory functions, powers and duties under the RMA. GWRC is not able to legitimately direct these outcomes. Council considers these provisions ultra vires.	Council opposes the provisions and seeks that the RPS is reviewed and amended to more appropriately and accurately reflect the powers, functions and duties of the regional, district and city councils.		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
S34.0116	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose	Lack of higher order document or evidentiary support for provisions, and policies which duplicate national direction: Many of the proposed provisions do not appear to be adequately supported within the Section 32 Assessment by robust evidence, including any existing legislation or higher-level strategic planning document such as a national policy statement. This is particularly evident for the proposed climate change and indigenous biodiversity provisions.	Council submits that a full legal and planning review is undertaken to address these inconsistencies and seeks relief to specific provisions as identified in Table 1 below.		Accept in part
S34.0117	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose	Lack of consideration of scale of provisions: The requirements and evidence base to develop the thresholds require significant effort and resourcing, which Council is not in a position to undertake, and in some cases, thresholds may not be an appropriate mechanism to address effects	Council contends that GWRC should further consider the practicalities associated with threshold-based provisions, to determine if this is the most appropriate method to achieve an objective or policy or develop guidance jointly with territorial authorities to support the development of provisions and decision-making process. Council seeks relief to specific provisions as identified in Table 1 below.		Accept in part
S34.0118	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose	Inadequacy of Section 32 Assessment: Council is concerned that the Section 32 assessment is not sufficiently evidenced and does not fully evaluate whether many of the regulatory provisions are practical / can be achieved and are the best method of achieving the outcomes sought.	These provisions should be deleted and considered in a later plan change.		Accept in part
S34.0120	Te Kaunihera o Te Awa Kairangi ki Uta, Upper Hutt City Council	General comments - overall	Oppose	Council considers that there are fundamental issues with the proposed provisions that require significant revision or deletion to ensure the RPSPC1 is legally robust and practical to implement. Thus, Council seeks that GWRC undertake a full legal and planning review of the proposed provisions and amend the RPSPC1 to address these concerns, including detailed submission points on individual provisions included in Table 1.	Council also seeks any other consequential amendments to remedy errors and address relief sought.		Accept in part
S30.0123	Porirua City Council	General comments - consideration policies	Oppose	Council opposes all "consideration" policies since they often duplicate or conflict with "regulatory" policies, and represent regulatory overreach without sufficient s32 evaluation or other evidence. We consider that they will create unnecessary regulatory costs due to the way they are drafted. They assume a level of knowledge and expertise on a range of matters generally not available to consent authorities, and in some cases represent a transfer of s31 functions to territorial authorities.	Not stated.		Accept in part
FS25.041	Peka Peka Farm Limited		Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Reject
S30.099	Porirua City Council	General comments - definitions	Oppose	Clear and concise definitions are critical to assist in interpretation and implementation of the RPS.	Add any further definitions for any terms that are unclear and where a definition would assist in interpretation and implementation, including any relevant terms proposed to be introduced in response to submissions.		Accept in part
FS25.132	Peka Peka Farm Limited	General comments - definitions	Support	The submission provides a comprehensive analysis of the proposed change including in relation to matters of scope and jurisdiction. It is supported without prejudice to the specific relief sought in the primary submission or this further submission by Peka Peka Farm Ltd.	Allow		Reject
S140.002	Wellington City Council (WCC)	General comments - consideration policies	Support in part	The title of the regulatory policies as 'consideration' policies set out in chapter 4.2 creates confusion for their statutory weighting and should be amended.	Amend the wording of the title of the regulatory policies as outlined in Chapter 4.2 from 'Consideration' to 'Give particular regard'.		Accept in part
S158.001	Kāinga Ora Homes and Communities	General comments - consideration policies	Oppose	Considers that all of the policies in Chapter 4.2 have been worded to read as assessment criteria for consideration within other resource management approval processes such as resource consents. Notes that regional policy statements are to contain methods, but not rules (or the associated assessment criteria). Seek that all policies directing matters of consideration for resource consent are deleted from the regional policy statement in full.	That Chapter 4.2 is deleted from the regional policy statement in full. OR In the alternative that this relief is not granted, seek that the policies are reworded to state the intended outcome such that regional and district plans giving effect to the regional policy statement are suitably informed of the desired outcomes to address identified resource management issues.		Accept in part

S42A Appendix 2 - Climate Change - Agricultural Emissions - Submission Summary Recommendation Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Reasons	Decision Requested	Decision Sought	Summary Recommendation
FS6.013	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	General comments - consideration policies	Oppose	We oppose this submission because this chapter gives effect to the National Policy Statement on Urban Development and the National Policy Statement for Freshwater Management. This chapter has important provisions in relation to Te Mana o te Wai, mana whenua/ tangata whenua roles and values and mātauranga Māori.	Disallow		Accept in part
FS3.032	Waka Kotahi NZ Transport Agency (Waka Kotahi)	General comments - consideration policies	Support in part	WK supports submission in part and also seeks clarification as to the intent and implementation of this policy.	Not stated	Waka Kotahi seeks clarification as to the intent and implementation of this policy.	Accept in part
FS20.031	Ātiawa ki Whakarongotai Charitable Trust	General comments - consideration policies	Oppose	Ātiawa strongly oppose the submission point, it would be inappropriate to delete Chapter 4.2, the chapter contains important strategic policy direction to plan users on how te taiao must be managed, in accordance with Te Tiriti o Waitangi, the RMA, national policy and other statutory direction.	Disallow		Accept in part
S158.044	Kāinga Ora Homes and Communities	General comments - consideration policies	Not Stated / Neutral	Considers that a number of policies have been worded within the chapter to read as assessment criteria for consideration within other resource management approval processes such as resource consents. Notes that regional policy statements are to contain methods, but not rules (or the associated assessment criteria).	Seek that Chapter 4.2 is deleted from the regional policy statement in full, however seeks that Policy UD.3 is retained with amendments and relocated to Chapter 4.1.		Accept in part
FS6.014	Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira	General comments - consideration policies	Oppose	We oppose this submission because this chapter gives effect to the National Policy Statement on Urban Development and the National Policy Statement for Freshwater Management. This chapter has important provisions in relation to Te Mana o te Wai, mana whenua/ tangata whenua roles and values and mātauranga Māori.	Disallow		Accept in part
S165.060	Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird)	General comments - consideration policies	Oppose in part	Submission in reference to Chapter Introduction and Table of Contents Chapter 4.2. The introduction (above the table) incorrectly states the weight to be given to the chapter's policies when changing or varying regional and district plans. Those plans must give effect to the RPS, not have particular regard to the RPS' provisions.	This section contains the policies that need to be given particular regard, where relevant, when assessing and deciding on resource consents or notices of requirement. <b>The policies must be given effect to</b> when changing, or varying district or regional plans. Within this section, policies are presented in numeric order, although the summary table below lists the policy titles by topic headings.		Accept in part
FS30.319	Beef + Lamb New Zealand Ltd	General comments - consideration policies	Oppose	B+LNZ generally oppose the submission on the grounds that's B+LNZ are seeking changes of the plan change are restricted to those necessary to give effect to the National Policy Statement for Urban Development and that any other matters should be subject to proper review in the Schedule full review of the RPS in 2024 and in the scheduled reviews of the Natural Resources Plan in 2023 and 2024. This is because the changes materially impact on communities, including rural communities and we do not consider that the necessary engagement has been undertaken to adequately inform these provisions or to meet the requirements of Part 3.2 of the NPS-FM. Furthermore, there is a risk that including matters relating to climate change and indigenous biodiversity before key national legislation is gazetted or implemented is premature and will lead to the inefficient implementation and confusion amongst those who it impacts materially.	Disallow		Accept in part