

# *submission*

*From*

***Beef + Lamb New Zealand***

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*To the Ministry for the Environment*

***On the draft National Adaptation Plan***

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*3 June 2022*



## SUBMISSION ON THE DRAFT NATIONAL ADAPTATION PLAN CONSULTATION

**TO:** Ministry for the Environment

**DATE:** 3 June 2022

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## Executive summary

Beef and Lamb New Zealand (B+LNZ) welcome the opportunity to provide feedback on the draft National Adaptation Plan. We are aware climate change can have a significant impact on our farmers' businesses and personal wellbeing. Farming communities, farmer livelihoods, and day-to-day farm management, are regularly disrupted and directly affected by extreme weather events. We know that the severity, scale, and frequency of these events will only increase over time as the impacts of climate change become more pronounced.

New Zealand farmers are already climate change adaptation practitioners, changing their practices to align with the differences in season variations. To ensure the sector's future resilience to the impacts of climate change, farmers need good information, tools, and choices to assist in their decision making.

B+LNZ call on the government to support farmers in building their climate resilience by developing options with farmers through a partnership approach. We want farmers to have all the information they need, presented in an accessible format, to enable sensible farm and business management choices.

The National Adaptation Plan has a notable absence of extension services for primary industries and rural communities. B+LNZ encourage government to leverage off our existing advisory and extension services, through additional support and funding. We would like to see government partner better with industry and sector partners to enable better outcomes for farmers, build stronger relationships, and promote a more integrated approach.

Farmers already have the skills to make adaptation decisions. The best support farmers can receive in respect of adaptation planning is to have robust climate and natural resource information and planning tools and choices to better manage their own businesses, livelihoods, and continued resilience.

B+LNZ have concerns about the implementation of the huge quantity and diversity of policy in the plan. We wish to see policies affecting pastoral farming better coordinated by the government. The government must understand these linkages when designing policies to ensure that farmers are not overwhelmed with uncoordinated government regulation that impacts the same set of rural stakeholders. Our farmers want joined up, practical and implementable policies.

B+LNZ would like to see the 'rural proofing' framework as a component of the whole-of-government approach. The government needs to take into account the particular challenges faced by the rural sector when designing and implementing policy.

## Introduction

B+LNZ welcome the opportunity to provide feedback on the draft National Adaptation Plan.

B+LNZ are industry-good bodies funded under the Commodity Levies Act 1990, through a levy paid on all milk solids and all cattle and sheep slaughtered in New Zealand, respectively. B+LNZ have the mandate to submit on behalf of its levy-payers on matters that affect them.

B+ LNZ represents around 9,000 farming businesses, providing around 35,000 jobs across New Zealand. The sector is a significant contributor to New Zealand's economic well being. Export revenue from New Zealand's red meat industry for the year ending 30 June 2022 are projected to be \$11.1 billion.

B+LNZ actively works across numerous environmental programmes, building farmers' capability and capacity in environmental management, supporting sustainable product development, influencing government policy, and building on farmers' ethos of environmental stewardship, as part of a vibrant, resilient, and profitable sector based around thriving communities.

B+LNZ are keenly aware that climate change is already impacting New Zealanders. For the farming sector the impacts of more frequent and severe weather events have the ability to negatively impact productive land, livestock and human welfare, infrastructure at a farm, local, regional and even national level.

New Zealand farmers are already climate change adaptation practitioners. Farmers are making decisions on how to adapt to extreme weather events on a regular basis. The best support farmers can receive in respect of adaptation planning is to have robust climate and natural resource information and planning tools and choices to better manage their own businesses, livelihoods, and continued resilience.

## Summary of Recommendations

- **Recommendation 1:** Government leverage off industry's existing advisory and extension services.
- **Recommendation 2:** All adaptation (and wider climate) policy is specifically examined through the rural proofing framework.
- **Recommendation 3:** Government take an integrated and coordinated approach to policies affecting pastoral farming, especially those focusing on mitigation and adaptation.
- **Recommendation 4:** A central government oversight and coordination body is established to implement the national adaptation plan.
- **Recommendation 5:** Government deliver guidance to regional councils on the treatment of agricultural greenhouse gases.
- **Recommendation 6:** All tools and services should be designed with, and for, the end-user (farmers) using the principles of co-design.
- **Recommendation 7:** The Water Availability and Security programme is prioritised. This includes addressing regulatory, legislative and financial barriers that are inhibiting the improvement of water resilience.
- **Recommendation 8:** Greater urgency is shown to address the mis-alignment of council's water storage policies to ensure farmers and communities have the appropriate access to catchment water management and storage infrastructure.
- **Recommendation 9:** Central government agencies and regional councils add value to data access for primary industries by confirming data requirements across sectors, coordinating and cataloguing the current processes and data sources, supporting development needs, and supporting on-going cohesion.
- **Recommendation 10:** Government aligns with and leverages off the He Waka Eke Noa on-farm sequestration programme to achieve on-farm biodiversity outcomes.
- **Recommendation 11:** Increase on-farm biodiversity by helping landowners make informed decisions about best practice management on their land. We do not support regional councils determining what land should be set aside for 'ecological corridors'.
- **Recommendation 12:** Biosecurity auditing and compliance of quality management systems within Government agencies (and Crown Entities) is funded by Government itself along with additional sponsoring and supporting such measures across local government.
- **Recommendation 13:** Note concerns that centralised decision making on water infrastructure investment will leave rural communities and the primary industries under-invested in and further exposed to climate change.
- **Recommendation 14:** Engage with communities to work with the knowledge they hold and provide them the means, time, and space to develop a collective plan for adaptation.
- **Recommendation 15:** Take additional action to support the mental health and wellbeing of rural communities in the face of climate change.
- **Recommendation 16:** Add a further Economy and Financial System objective: "Ensure high-value and economically significant sectors have the support required to continue to provide stability for the New Zealand economy, and to enable the required investment for climate change adaptation".

- **Recommendation 17:** Particularly apply the rural proofing framework when considering the impact of climate change assessment within rural banking.
- **Recommendation 18:** Remove the action within the National Adaptation plan directing landowners and farmers on what to do with their land based on their on-farm data. Alternatively, we support farmers making informed self-driven decisions, and maintaining control over their own on-farm data.
- **Recommendation 19:** Develop an overarching research and development strategy guiding investment (such as the Biological Emissions Reduction Science Accelerator Plan), to avoid duplication and ensure priority research areas are adequately funded.

## Our Climate Reality

**Consultation Question 1:** *Climate change is already impacting New Zealanders. Some examples include extreme weather events such as storms, heatwaves and heavy rainfall which affects lives, livelihoods, health and wellbeing, ecosystems and species, economic, social and cultural assets, services (including ecosystem services) and infrastructure. How is climate change impacting you? This could be within your community and/or hapū and iwi, and/or your business/organisation, and/or your region.*

Farming communities, farmer livelihoods, and day-to-day farm management, are regularly disrupted and directly affected by extreme weather events. We know that the severity, scale, and frequency of these events will only increase over time as the impacts of climate change become more pronounced.

The impacts of climate change can have a significant impact on our farmers' businesses and personal wellbeing. Climate change will lead to damaged on-farm infrastructure, new animal care challenges, increased pest incursion and disease, and impact of feed supply and budgeting, as well as potentially disrupting product volume and timing. These challenges can impact the primary sector's profitability and production.

**Consultation Question 2.** *The national adaptation plan focuses on three key areas. Please indicate which area is most important for you (tick box).*

We prefer a focus on the action to "provide data, information, tools and guidance to allow everyone to assess and reduce their own climate risks."

It is important for farmers to have access to relevant data and tools to enable them to adapt to climate change. If they can make decisions with the best and current data available, then they can future-proof their business with increased certainty.

B+LNZ has a long history of being a source of data collection, analysis and delivery for their sectors. This means we have a grounded and detailed understanding of the farm processes, business demands and the range of farmer capability. Both organisations have operated as an interface and conduit of data and information between farmers, market, government, and the sector's supporting industries for decades. This provides us with a solid platform from which to support our farmers in climate adaptation, and we urge government to work from this existing platform.

**Consultation Question 3a.** *What are the key actions that are essential to help you adapt?*

Key actions we identified as relevant to our sector:

SW1: Reform the resource management system

SW1: Modernise the emergency management system



SW1: Implement the National Disaster Resilience Strategy

SW1: Establish central government oversight and coordination for implementing the national adaptation plan

SW2: Design and develop and Adaptation Information Portal

SW2: Provide access to the latest climate projections data

SW3: Regularly update adaptation guidance for local government

NE1: Implement the Water Availability and Security programme

NE2: Pilot the on-farm biosecurity programme

NE1: Implement the Sustainable Land Management Hill Country Erosion Programme

NE1: Provide a forestry planning and advisory service

NE3: Establish an integrated work programme to deliver climate, biodiversity, and wider environmental outcomes

C1: Building community resilience through social cohesion

C3: Connect communities to wider response and recovery support

EF1: Continue delivering the SLMACC and GHG Inventory research programmes

EF1: Continue delivering the Sustainable Food and Fibre Futures Fund

EF1: Identify the impacts of climate change on regional economies

**Consultation Question 3b.** *What actions do you consider to be urgent?*

The actions that we see as the most urgent include implementing the National Disaster Resilience Strategy, designing and developing an Adaptation Information Portal, making climate projections data available, implementing the Water Availability and Security programme, piloting the on-farm biosecurity programme, and connecting communities to wider response and recovery support.

At a strategic level, we consider the recommendation to require alignment across agencies and organisations to be urgent. We need clear roles and responsibilities and an integrated approach to addressing and adapting to climate change. There should be a specific focus on providing clarity to local government and regional councils on their role in adapting to climate change.

**Consultation Question 3d.** *Are there any actions not included in this plan that would help you to adapt?*

We do not believe that many of the actions listed will provide the required additional support to our farmers in the near term. There is a current gap in support and extension for farmers in adapting to a changing climate.

To be effective, extension services need to be grounded in strong farm system knowledge and trusted relationships. Farmers support needs to come from trusted advisors with practical and in depth knowledge of farming.

B+LNZ has been providing extension services for decades now, and over that time we have built the infrastructure, experience and expertise required to provide farmers with the advice they need to continuously improve their farm's performance across economic, environmental and social dimensions.

B+LNZ urges government to leverage off our existing advisory and extension expertise and extension services. This could best be done through additional support and funding. We would like to see a strong government partnership with industry to enable better outcomes for farmers, build stronger relationships, and promote a more integrated approach.

We would also like to see more of a focus on integration of trees within farming businesses. The carbon and resilience benefits these trees can provide should be supported and encouraged. Although many councils have existing programmes for supporting the establishment of trees, the upfront cost of planting can be a barrier and the risk of planting failure after planting is only likely to increase as our summers become hotter and drier.

We also note the climate resilience consequences of mismanaged carbon forestry plantings. These plantings are likely to result in increased pest and disease risk as well as fire. Urgent action must be taken to ensure that management of these forests does not exacerbate the risks posed to our rural communities from climate change.

## System wide actions

**Consultation Question 6.** *Do you agree with the objectives in this chapter? Why?*

B+LNZ agree with the objectives set out in this chapter.

Specifically, we support alignment of regulatory frameworks and policy. We agree that there is a lack of coordination across government in regulation, information and data. We do not support mis-aligned, piecemeal regulation that is going to increase cost and compliance burden for our farmers. Farmers need integrated regulations and policy, and to be able to access relevant information and tools to support adapting to a changing climate.

As outlined in the plan, there are three big regulatory reforms in the coming months/years - Resource Management Act Reform, Three Waters, and Local Government Review. Farmers are already in a high change environment, with new regulations on freshwater, climate, biodiversity, biosecurity, and animal welfare. We need government action on and communication of new regulatory requirements to consider the cumulative impact of all this change.

B+LNZ wish to see policies, data, and information affecting pastoral farming better coordinated by the government. The government must understand these linkages when designing policies to ensure that farmers are not overwhelmed by a wave of uncoordinated government regulation that all impacts upon the same set of rural stakeholders. Our farmers want joined up, practical and implementable policies.

We support the recommendation for the establishment of a central government oversight and coordination body to implement the national adaptation plan. There is a huge quantity and diversity of policy in the plan, which will require careful coordination and management to ensure integrated and effective implementation. This coordination should extend to the alignment of approaches to climate adaptation and mitigation within local government. B+LNZ emphasise the need for this central oversight body to follow the principles of 'rural proofing'<sup>1</sup> when coordinating implementation.

**Consultation Question 7** *What else should guide the whole-of-government approach to help New Zealand adapt and build resilience to a changing climate?*

B+LNZ would like to see the 'rural proofing' framework as a component of the whole-of-government approach. The government needs to take into account the particular challenges faced by the rural sector when designing and implementing policy.

We would also like to see the implementation and design of adaptation tools to be completed with the end-user (farmers) at the centre of the process. For tools to be effective at driving change, they need to be accessible and provide relevant information in a way that is intuitive and useful to the end-user. B+LNZ would like to support government by facilitating conversations with our farmers on what this could look like.

There is currently a lack of direction to local government on their role in climate change adaptation and mitigation. The plan states that local government will have a 'central role in managing natural hazard risks'. B+LNZ are aware that most regional councils will also be notifying their regional policy statements soon and as such, there is a high degree of urgency.

We request that the government deliver guidance to regional councils on the treatment of agricultural greenhouse gases. Currently, we are experiencing local councils drafting policy that is at odds with or duplicative of national climate change policy direction. It is critical that central government provides guidance to regional councils on their role in climate change policy. We are open to the implementation of RMA tools such as an NPS, but want to ensure that bureaucratic burdens involved in developing these tools do not get in the way of the clear needs for clarity and alignment at present.

We also recommend that the disconnect between emissions mitigation and climate change adaptation policy in New Zealand is rectified. Although there are numerous examples of this in practice, a key concern for B+LNZ is the current lack of consideration of the

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<sup>1</sup> <https://www.beehive.govt.nz/release/rural-communities-heart-all-decisions>

consequences of un-or mis-managed exotic plantings established predominantly as carbon sinks.

Unmanaged carbon forests are not likely to have positive impacts on communities, biodiversity, or climate resilience efforts. The climate resilience of our rural landscapes and communities must be front and centre as we transition to a net carbon emissions future and current policy settings in the NZ ETS are not providing this.

**Consultation Question 8.** *Do you agree that the new tools, guidance and methodologies set out in this chapter will be useful for you, your community and/or iwi and hapū, business or organisation to assess climate risks and plan for adaptation?*

Yes. Tools and data will be critical for enabling farmers to make informed decisions about climate adaptation and mitigation. Specifically, B+LNZ support the actions to:

- Provide access to latest climate projections data
- Complete the Data Investment Plan project
- Design and develop an Adaptation Information Portal. Note: B+LNZ support this as a national hub for all of New Zealand, but wish to see a specific information portal for rural communities and the pastoral farming sector.

**Consultation Document Q9a.** *Are there other actions central government should consider to: enable you to access and understand the information you need to adapt to climate change?*

The development of tools and resources should be done with farmers at the centre of the process, following the principles of co-design.

When building tools for farmers to help understand and implement climate resilience in their communities, we have heard farmer's dislike for increased administration, and a strong preference for tools that draw upon existing business practices. Additionally, duplication of effort is often raised as a barrier to engaging.

Information on the impact of climate change on natural resources – in particular soil and water resources, is required. It is imperative that farmers have a strong understanding of likely changes and how this information can be used to underpin their successful climate adaptation.

We emphasise the importance of 'rural proofing' both data provision as well as climate resilience assessments. Data packaged and delivered in a format that has not been created with the farmer in mind risks not being absorbed or used, or at worst distracting the farmer from the objective by losing them in the detail. A "tick-box" exercise that does not provide value takes time and energy away from efforts toward increasing their farm business success and exploring solutions.

B+LNZ welcome further discussions with government to facilitate discussions with pastoral farmers and rural communities.

Industry groups are currently completing a Farmer Centred Design work programmes, with a focus on co-design with farmers. We offer our expertise in this area to MfE and the government for their implementation of the plan, and design of tools and data.

B+LNZ has recently completed a GHG calculator. This tool is able to present the required information to the farmer in a client focussed way, providing relevant and direct value without requiring the farmer to be caught in the new detail by using existing farm resources. This has allowed farmers to focus on the value provided (their GHG metrics) and what it means to their business, rather the process or what is entailed in arriving at the outcome. B+LNZ welcomes discussions with MfE and wider government if they wish to gain any insights from the design process.

B+LNZ already have a comprehensive set of products and services built to respond to farmer needs, and we see it would be valuable to leverage these existing materials rather than new ones being developed when they already exist.

As part of this national adaptation plan, we would like the government to leverage off our existing industry expertise, resources, and systems. This will minimise the imposition on farmers and ensure that there is a value-add from the farmers' perspectives. B+LNZ's long-standing relationship with its farmers has taught the value of being a trusted adviser. These existing relationships will promote greater engagement.

**Consultation Document Q9b.** *Are there other actions central government should consider to provide further tools, guidance and methodologies to assist you to adapt to climate change?*

Central government agencies and regional councils can add value to data access for primary industries by confirming data requirements across sectors, coordinating and cataloguing the current processes and data sources, supporting development needs, and supporting on-going cohesion.

## Natural environment

**Consultation Document Q14.** *Do you agree with the actions set out in this chapter? Why?*

### Implement the Water Availability and Security programme

We agree that the availability of freshwater is of key concern to the primary sector and rural communities.

We support the outcome of the Water Availability and Security programme, 'to help restore and maintain the health of waterways, and help primary sector businesses and rural communities adapt to increasingly variable natural water'.

However, B+LNZ have concerns that this work programme is offering a 'band-aid' rather than addressing the underlying issue, water infrastructure and storage.

We appreciate that there needs to be a strategic plan to ensure that freshwater, as a finite resource, is utilised effectively. But development of a supply and demand strategy should be coupled with significant investment in new water infrastructure.

We also have concerns about the central government making water supply decisions at a catchment level. Catchments are unique, and effective decision making will require regional knowledge and expertise.

We request that the Water Availability and Security programme is prioritised and that greater urgency is shown in addressing regulatory, legislative and financial barriers that are hampering the improvement of water resilience. This programme should be complemented by significant increased investment in water infrastructure.

We request decision making powers about water supply are set at the community and catchment level. These decisions should be made with landowners and the community, and not from a Central government department.

#### Implement the proposed National Policy Statement on Indigenous Biodiversity

He Waka Eke Noa will have an important link to on-farm biodiversity through its sequestration work programme. This will incentivise farmers to provide indigenous biodiversity and complete active ecological management. +LNZ encourages government to align with and leverage off the He Waka Eke Noa on-farm sequestration programme to achieve on-farm biodiversity outcomes.

The plan states that the NPS on Indigenous Biodiversity would 'require councils and landowners to consider creating ecological corridors in response to climate change'. B+LNZ support increasing on-farm biodiversity through landowners making decisions about their land use. We do not support regional councils determining what land should be set aside for 'ecological corridors' and instead recommend engaging with farmers to identify and create potential corridors on a voluntary basis, such as through catchment groups (note that incentives may form a part of this).

#### Deliver a collection of actions run by Biosecurity New Zealand

Commentary around biosecurity in this plan is dominated by a discussion of indigenous ecosystems biodiversity. There is no recognition of the importance of farms and other exotic ecosystems. To remedy this, the risk section needs to acknowledge the risks to farm and other predominantly exotic ecosystems from the enhanced spread, survival, and establishment of invasive species due to climate change.

It is important to maintain control of, and where feasible, eradicate, unwanted pests, and vitally important to prevent incursion of new pest threats. However, the way in which this is achieved, cannot be a one-size-fits-all response through top-down driven reform. Pest management is best implemented in a systematic manner, where the response is proportionate to the level of threat, and presence of threat.

The Government should set up and fund auditing and compliance of such quality management systems within its own agencies (and Crown Entities), as well as sponsoring

and supporting such measures across local government. Spending money on training and auditing people to learn these skills and undertake this work, would be a better taxpayer investment than simply imposing hunch-based rules from the top-down.

## Infrastructure

**Consultation Document Q26.** *Do you agree with the outcome and objectives in this chapter?*

We agree with the objectives to reduce the vulnerability of assets exposed to climate change, to ensure all new infrastructure is fit for a changing climate, and use renewal programmes to improve adaptive capacity.

The preparation and management of our built environment must be a key consideration in the plan. However, we feel that the actions are inclusive enough of built infrastructure as this relates to flood, storm, erosion, and catchment management.

**Consultation Document Q27.** *What else should guide central government's actions to prepare infrastructure for a changing climate?*

Rural infrastructure is crucial not just for farmers and growers and rural communities, but also for those 'downstream'. Rural communities are likely to be disproportionately affected by climatic changes due to their reliance on a small number of service providers for delivery of essential services. Rural communities must be provided with continued and improved support for rural infrastructure such as roads, power, internet, and catchment flood management.

We would like to see further consideration of infrastructure investment and rural communities. Population density and geographic dispersal mean rural New Zealanders are far more dependent on network infrastructure than urban New Zealanders. Loss of a rural road or bridge risks isolating entire communities. Outages in electricity supply mean disruptions to the farm operation that risk animal welfare. Loss of connectivity risks rural access to health and emergency services.

On telecommunications, connectivity in rural areas is of a generally poor standard for many farmers. In a 2021 DairyNZ survey, 52% of farmers said they did not have the cellphone reception or broadband they need on farm. Internet connectivity is a critical enabler to accessing climate adaptation tools and data, and making informed decisions.

On land transport, farmers have had to endure decades of substandard investment in maintaining rural roads and bridges upon which they rely. Local rural roading networks are in many instances unfit-for-purpose. In almost all districts across the country, unsealed roads make up a significant portion (1/3<sup>rd</sup> to 1/2) of the total length of roads owned and managed by local councils. This is particularly galling for farmers given the disproportionate contribution they make towards funding road maintenance as ratepayers, with little to no improvement to the state of the roads and bridges upon which they rely. It also means that only certain types of vehicles are robust enough to travel on such roads, and this excludes many types of vehicles currently available with electric or hybrid engines. We are open to ways to manage

this, including an increase in the Financial Assistance rate to District Councils as well as changes to the capital based rating apportionment in current District Plans to fund roading.

**Consultation Document Q28.** *Do you agree with the actions set out in the infrastructure chapter?*

Many of the actions included within the Infrastructure Chapter will have limited relevance for our farmers given the focus on urban infrastructure including public and active transport, investment in urban areas, and hydro-electricity supply (mostly for urban demand).

B+LNZ believe that water availability is one of the most important factors for climate change adaptation. We note the plan relies solely on the success of the Three Waters Reform for investment in new water infrastructure. We have concerns that centralised decision making on water infrastructure investment will leave rural communities and the primary industries under-invested in and further exposed to climate change.

B+LNZ would like to see an investment strategy specifically for increasing water availability and access in the regions. This strategy will need to look at additional infrastructure that is both 'within' and 'beyond' the farm gate to ensure that catchment management approaches are included. There should be a focus on both 'built' and 'planted' infrastructure.

We would like to see advice and support to enable small-scale irrigation dams to be established in areas where they can have reduced risk of blow-out, be best utilised during a fire event, and provide opportunities for those landowners able to access it in times of need.

From a catchment climate resilience perspective, we would like Regional Councils to provide information to catchment communities on the resilience of their catchment given the likely impacts of climate change. Planted and built rural infrastructure should be catalogued and assessed for suitability given the likely impacts of climate change. This is especially the case for the management of rivers and drainage networks which are likely to be past their 'best by' date.

We strongly encourage the application of a wider community and catchment engineering lens to the concept of 'infrastructure' and support the alignment and streamlining of council's water storage policies to ensure farmers and communities have the appropriate access to much needed catchment water management and storage infrastructure.

**Consultation Document Q29.** *The national adaptation plan has identified several actions to support adaptation in all infrastructure types and all regions of Aotearoa.*

- a. *Do you see any further opportunities to include local community perspectives in infrastructure adaptation decision-making?*
- b. *Do you see any further opportunities to ensure that groups who may be disproportionately impacted by climate change, or who are less able to adapt (such as those on low incomes, beneficiaries, disabled people, women, older people, youth, migrant communities) have continued and improved access to infrastructure services as we adapt?*



New Zealand's diversity presents challenges to a one-size-fits-all approach being taken on most issues. For infrastructure, there are obvious differences in the needs and opportunities of those in urban centres and rural communities. We would like to see further consideration of infrastructure investment and rural communities in infrastructure adaptation decision-making.

*e. Do you think we have prioritized the right tools and guidance to help infrastructure asset owners understand and manage climate risk?*

We are disappointed that the National Adaptation Plan does not consider catchment-based built infrastructure as part of its assessment. Not all 'built' infrastructure is made of concrete. Rather this infrastructure could be made of earth, clay, or wood.

**Consultation Document Q31.** *Are there any other tools or data that would help infrastructure asset owners make better decisions?*

Farmers already act as individuals and as collectives within their farming communities. The challenge with climate change and freshwater/storm water management is ensuring that effective conversations are had and plans put in place prior to drought or flood events.

We do not see sufficient evidence for support for these kinds of catchment infrastructure conversations within the National Adaptation Plan. Given the timescales at which some natural infrastructure requires to become established, we need to have the conversations now to ensure they are fit for purpose when the time comes. This will require further alignment across local government and industry asset managers. This provides significant opportunity to include local mana whenua perspectives, other local community perspectives in our catchment infrastructure adaptation decision making.

## Communities

**Consultation Document Q32.** *Do you agree with the outcome and objectives in this chapter?*

We agree with the objectives of this chapter. We particularly agree that rural communities will be disproportionately affected.

We also agree that communities vary greatly in their connections and ability to adapt. In some areas, communities have strong connections, are able to withstand many external challenges, and are able to adapt. Others are more disconnected and under-resourced. This could be especially pronounced for our Māori farming communities.

**Consultation Document Q33.** *Do you agree with the actions set out in the communities chapter?*

Yes. Specifically, we support the actions to:

- Raise awareness of climate-related hazards and how to prepare.

- Develop a health national adaptation plan.
- Connect communities to wider response and recovery support.
- Expand current funding for proactive community resilience.

**Consultation Document Q34.** *What actions will provide the greatest opportunities for you and your community to build climate resilience?*

We submit that ‘Raising awareness of climate-related hazards and how to prepare’ and ‘Connecting communities to the wider response and recovery support within rural areas’ will be instrumental in ensuring resilience.

However, implementation of these actions will require more than just about ‘providing’ information. It is about engaging communities based on the knowledge they hold and providing them the means, time, and space to develop a collective plan for adaptation.

**Consultation Document Q35.** *Are there additional actions central government should consider to support your health and wellbeing in the face of climate change?*

We support additional action being taken to support the mental health and wellbeing of rural communities in the face of climate change. Although there are fantastic existing programmes in place, such as FarmStrong and Rural Support Trusts, these organisations may not be able to manage the demand placed on their services as the impacts of climate change become more pronounced.

There are many words of wisdom to learn from when implementing ‘policy’ in rural communities. Within a climate adaptation context, this includes considering how farmers are already adapting and what other pressures they are experiencing if they are to ‘set the boundaries and pave the road’ to support positive change.<sup>2</sup>

*“When policy-makers are trying to engage, they need to understand that farmers have been adapting to adverse conditions for a long time. Dairy farmers, for example, have moved to grow feed crops in order to give themselves more control. Because there are so many things that farmers cannot control, any new tools or techniques that can increase certainty will contribute significantly to mental health.”<sup>3</sup>*

A report published by DairyNZ’s in 2020 highlighted that rural mental health is an ongoing issue, with 62 percent of dairy farmers stating they, or someone on their farm, has experienced mental health issues in the past 12 months.<sup>4</sup>

Our sectors are working hard to support our farmers and their wellbeing but operating in an increasingly volatile, uncertain, complex, and ambiguous context is becoming more

<sup>2</sup> <https://ourlandandwater.nz/news/drought-symposium-1>

<sup>3</sup> <https://ourlandandwater.nz/news/drought-symposium-1/>

<sup>4</sup> [https://www.dairynz.co.nz/media/5793525/the\\_view\\_from\\_the\\_cow\\_shed\\_18\\_aug\\_2020.pdf](https://www.dairynz.co.nz/media/5793525/the_view_from_the_cow_shed_18_aug_2020.pdf)

challenging. This is particularly the case for those working within natural landscapes who have additional pressures on them including isolation, limited access to health providers, and increased regulatory burdens.

## Economy and Financial System

**Consultation Document Q38.** *Do you agree with the outcome and objectives in this chapter?*

We agree that primary industries are very exposed to the impacts of climate change as they depend on climate-sensitive natural resources.

We agree that adapting to climate change will be costly and it will require a strong economy if adaptation is to be affordable. B+LNZ would like to emphasise the importance of the primary industries to the New Zealand economy, and in ensuring New Zealand is well positioned for the investment required in climate change adaptation. In the 2020/2021 financial year, the primary sector comprised 82.4% of all trade, and 11% of New Zealand's GDP<sup>5</sup>. Primary industries are forecast to generate \$50.8 billion in export revenue this year, with the pastoral sector generating \$32 billion of that.

Investment needs to occur at all levels of government to build future resilience and preparedness in the rural sector. This is essential to support and protect the primary sectors' contribution to New Zealand's export earnings and wider economic contribution. This investment should be undertaken in consultation with rural communities and should use a rural proofing framework.

In addition to those listed in the chapter, we would like a further objective: "Ensure high-value and economically significant sectors have the support required to continue to provide stability for the New Zealand economy, and to enable the required investment for climate change adaptation"

**Consultation Document Q40.** *Do you agree with the actions set out in this chapter?*

### RBNZ supports the stability of the financial system

The plan has a strong focus on transparency of climate related risk in businesses, investing, lending, and insurance decisions.

B+LNZ would like to see the rural proofing framework applied, and for the government to consider the impact of climate change assessment within rural banking. Farmers hold a large amount of debt. In 2019, farm debt was almost at \$63 billion.

### Design and implement the Farm Monitoring programme to determine farm performance

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<sup>5</sup><https://www.mpi.govt.nz/dmsdocument/45451-Situation-and-Outlook-for-Primary-Industries-SOPI-June-2021>

B+LNZ have significant concerns about the implementation of this action. We would like the opportunity to talk with officials directly about these concerns, with a specific focus on data privacy and land use change.

We support landowners having the decision-making power to determine best use of their land. These decisions should be well-informed, and B+LNZ support farmers having the ability to benchmark themselves against similar farms, and understand what levers are available to them to increase profitability or sustainability.

However, we strongly oppose directing landowners and farmers on what to do with their land based on their on-farm data. We support farmers making informed self-driven decisions, and maintaining control over their on-farm data. Government should focus on providing easily accessible data and information, such as comprehensive climate, soil and water resource information, to support that decision making.

Continue delivering the Sustainable Land Management and Climate Change (SLMACC) and Greenhouse Gas Inventory research programmes AND Continue delivering Sustainable Food and Fibres Futures Fund

B+LNZ strongly support the continuation of these research funds. We would like to see one overarching research and development strategy guiding investment (such as the Biological Emissions Reduction Science Accelerator Plan), to avoid duplication and ensure priority research areas are adequately funded.

Identify the impacts of climate change on regional economies

B+LNZ strongly agree with this action, and believe that it should be fast-tracked. This information is critical for 'rural proofing' of policy decisions.

**Submission ENDS**