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Ministry for the Environment
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Tēnā koe

Bay of Plenty Region Local Authorities Joint Submission: Te hau mārohi ki anamata | Transitioning to a low-emissions and climate-resilient future

Thank you for the opportunity to submit on the Emissions Reduction Plan discussion document.

This is a joint submission from the following local authorities of the Bay of Plenty Region:

- Bay of Plenty Regional Council;
- Kawerau District Council;
- Ōpōtiki District Council;
- Rotorua Lakes Council;
- Taupō District Council;
- Tauranga City Council;
- Western Bay of Plenty Council; and
- Whakatāne District Council.

For matters relating to this submission, please contact Stephen Lamb, Manager Environmental Strategy, by email Stephen.Lamb@boprc.govt.nz or phone 0800 884 881 ext. 9327.

Please note that some of these councils will be making their own individual submissions which are consistent with, but more detailed than, this joint submission.

Toi Moana Bay of Plenty context

The Bay of Plenty is on the east coast of the North Island of New Zealand. The region takes in the full sweep of the coastline from the tip of East Cape to Waihi Beach. It encompasses significant river catchments and the Rotorua lakes. Over 300,000 people live in the Bay of Plenty. The region has a rich cultural dynamic: 26 percent of the population identifies as Māori, with 39 iwi, and more than 260 hapū. A third of land in the region is owned by Māori under various forms of tenure: the vast majority of this land is currently in exotic forestry land use, or native landscapes.

Rapid population growth trends present a range of climate change challenges for urban Bay of Plenty. Significant urban development pressures occur in places, a significant lack of housing supply is an issue across the region, while natural hazard considerations and transport issues add complexity. The high growth rates being experienced in some areas comes with a number of challenges and competing priorities, as do situations where populations are static or diminishing. Economic aspirations differ across the region as districts/cities look to achieve their development potential.

The Bay of Plenty local authorities recognise their role in leading, supporting and facilitating the region's transition to a low emissions, climate resilient society. The most recent [Stats NZ data](#) indicated that Bay of Plenty carbon emissions grew by 4.4 per cent in 2019 – a trend that we urgently need to reverse, emphasising the need for action. Bay of Plenty Regional Council, Rotorua Lakes Council and Whakatāne District Council have recently adopted Climate Action Plans, which outline ambitious targets and actions for emissions reductions and adaptation, internally and/or within their communities. Several of the councils have also established their own organisational emissions measurement and reporting processes or similarly have Climate Action Plans under development. This highlights the interest and engagement around climate change that already exists in our region, which needs to be built on through action and support at the national level.

High level position

The local authorities welcome the discussion document on the Emissions Reduction Plan (ERP) and recognise the complexities of this kaupapa. We appreciate the significant mahi that has gone into pulling together numerous strands from across multiple agencies and acknowledge the usefulness of the document as a reference source in this regard. We support the general intent and direction of the proposals, but urge the Government to do more to respond to the climate change crisis and address carbon emissions.

Our view is that the Government needs to take bold and decisive action through this Emissions Reduction Plan, with clear direction on roles and responsibilities, followed through with the necessary funding and support. The Plan needs to have a strong focus on behaviour change and an equitable transition at its core. We recognise the importance of central and local government working together to deliver our national emissions reduction targets, and the consequent need for clarity around roles and responsibilities, the balance between national and local policies, and overall timelines.

A summary of our collective view is as follows:

- **Behaviour change:** Behaviour change is at the heart of any action to reduce emissions across all sectors and there needs to be a stronger focus on this throughout the Emissions Reduction Plan. Understanding the barriers to changing behaviour are central to achieving and 'locking in' the proposed emissions reductions, and ensuring an equitable transition with affordability and accessibility for all. It is essential that Government establishes a well-resourced lead agency to drive behaviour change around emissions reductions and provide better understanding of how to motivate greater action from individuals and across all sectors. This agency needs to include skills such as behavioural psychology and social behaviourists to provide insights and practical solutions as to how best support the community to undertake the significant shifts required. It is also critical that local government, community leaders, and iwi/Māori are involved in development of local level strategies for rural communities, who face a greater diversity of challenges in reducing emissions compared to urban lifestyles and who will require different investment strategies and frameworks (e.g. access to healthcare, telecommunications, utilities infrastructure and waste services). The final Emissions Reduction Plan should be explicit on plans to achieve equitable transition objectives, the timeframe for implementing these measures, and mechanisms for accountability in this regard.
- **Partnership:** Alongside working in partnership with iwi/Māori on national level strategies, the Government needs to work in partnership with iwi/Māori and local government to co-design and deliver mitigation action at the local level. The ERP is a national plan but it will be delivered and have implications locally and regionally. Local government is best-placed to know how to support communities to realise their objectives and aspirations. In addition,





our proximity to, and existing relationships with, iwi/hapū means that we can work in partnership with Government to support its work with Treaty partners at the local level.

- **Funding:** Evidently large scale investment will be needed to deliver the substantial emissions reductions. At the local level, rates alone are unlikely to be sufficient to pay for mitigation actions, particularly considering the significant role local government also has around climate change adaptation. Councils will need additional funding in order to support action at the local level and contribute to emissions reduction goals. Distributed funding models will enable community champions and local leaders, including iwi/Māori to make decisions with their communities and whānau on the right approach and actions for their locality, guided by local perspectives, aspirations and objectives.
- **Efficiency:** Government will need to ensure 'best bang for buck', with efficient and effective use of funds at the appropriate scale, targeted on initiatives that result in the highest amount of emissions reduction per dollar invested. Efficiencies could be made through the standardisation of tools and resources to support mitigation actions that are common across sectors, including local government (e.g. carbon measurement and reporting, procurement criteria). These could be available through a centralised 'one-stop shop' alongside information sharing of experience and best practice, to facilitate consistency of approach and avoid duplication of effort across the motu.
- **Transport and urban planning:** Transport is clearly a key focus where deep emissions cuts are needed, and rightly so. The inter-dependency with urban planning is central to delivering these reductions. Integrating land-use, urban development and transport planning and investments requires Government to work in partnership with local government, alongside partnering with iwi/Māori to co-design and develop solutions to reduce transport emissions. This must be supported by adequate funding and financing options for implementation and infrastructure. We also note the particular challenges for our region in managing growth alongside reducing emissions, within the constraints of geography and likely impacts of climate change. A 'one size fits all' approach to transport and urban planning issues is not appropriate – any approach needs to recognise the local context and constraints.
- **Forestry:** We consider a strong focus on gross emissions reductions and decarbonising sources of long-lived gas emissions as essential and therefore support the proposal that the treatment of forestry in the NZ ETS should not result in a delay, or reduction of effort in reducing gross emissions in other sectors of the economy. Forestry is a significant industry within the Bay of Plenty and we support a focus on 'the right forests in the right places' alongside consideration of the extensive co-benefits provided, particularly by native forestry (e.g. biodiversity, erosion control, improved water quality and recreation).
- **Agriculture:** Agriculture is the biggest single emission source in the Bay of Plenty, accounting for nearly half (47%) of the gross emissions of the region. While the ERP gives great emphasis on the He Waka Eke Noa primary sector partnership programme providing solutions to curbing methane emissions, we are calling for more Central Government ambition as well as transparency in this space. Agriculture is one of the biggest economies and employment sectors in our region, meaning that an equitable transition needs to be at the forefront as we move towards a low emissions economy.

- **Nature-based solutions:** We propose a greater emphasis in the ERP on specific actions to deliver nature-based solutions, along with clarity on the level of carbon sinks and sequestration to be achieved through habitat restoration and planting of native forests. This will require better tools to understand and measure the contribution to emissions reductions from these actions. There are significant opportunities to incorporate nature-based solutions into the core business of councils, in particular for flood protection, stormwater and public open space management, noting that this will require additional expertise, resources, and funding.
- **Alignment:** It is essential that the ERP is aligned with the other reform processes that are currently underway (Three Waters, Future for Local Government and Resource Management reforms). This includes alignment with policies that are focused on climate change adaptation and increasing resilience to climate impacts. A high level timeline of the overall policy direction alongside the current legislative landscape would be helpful to understand the interaction between different sectors and policies and to avoid unintended consequences.
- We broadly support the points made in the submissions from LGNZ and Taituarā. These organisations can be effective routes to connect with local government more widely.
- Finally, we would like to register our concern with the tight timeframes associated with this consultation and the fact that this is the only opportunity to share our views on the contents of the (yet to be drafted) Emissions Reduction Plan.

The Bay of Plenty local authorities are keen and energised to work with the Ministry of the Environment, and other agencies, as they continue this mahi and confront a number of challenging issues.

Nāku noa, nā

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 Steph O'Sullivan Chief Executive Whakatāne District Council	 Gareth Green Chief Executive Taupō District Council	 Marty Grenfell Chief Executive Tauranga City Council
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