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National Adaptation Plan Consultation
Ministry for the Environment
PO Box 10362
Wellington 6143
adaptation@mfe.govt.nz

Dear Sir/Madam

Submission on the “Te mahere urutaunga a-motu (tuhinga hukihuki) Ministry for the Environment. 2022. Draft national adaptation plan”

Thank you for the opportunity to make a submission on the *Draft national adaptation plan (NAP)*, and the consultation document on managed retreat.

Please find the West Coast Regional Council’s (WCRC) submission attached.

We welcome the opportunity to respond to this consultation.

WCRC agrees that climate change adaptation is necessary for our Community. WCRC consider the document outlines climate change workstreams across government, while there is limited information on new initiatives to better support the transition of communities.

To make better informed feedback, WCRC would like to see more information on the Government’s proposed Climate Adaptation Bill and support for rural communities to transition to resilient and low carbon futures.

Poutini Ngai Tahu were asked if they wanted to have input into this submission.....

Our contact details for service are:

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We would be grateful for acknowledgement of receipt of our submission.

Yours faithfully

A handwritten signature in black ink, appearing to be 'H Mabin', followed by a long horizontal line extending to the right.

Heather Mabin
Chief Executive Officer

Summary List of Recommendations and Feedback

Recommendation 1

A national adaptation plan must evidence a coherent, easy to understand, “whole of government” approach, that is globally and nationally consistent with Emissions targets and agreements, and is also consistent with the mandate of local government, which is to:

- a) enable democratic local decision-making and action by, and on behalf of, West Coast communities; and
- b) promote the social, economic, environmental, and cultural well-being of communities on the West Coast in the present and for the future.¹

Recommendation 2

A nationally consistent, joined-up approach to Community education is required to ensure understanding of risk and resilience planning in our communities.

Recommendation 3

The WCRC request the NAP consider additional support requirements to provide support and resourcing for science and research. Particularly monitoring for small remote communities most at risk from aggrading rivers and increased rainfall intensity.

Recommendation 4

The WCRC requests that the Government, through the National Adaptation Plan, provides for:

- a) Economic incentives for the West Coast to transition to a low carbon, resilient future, while maintaining current carbon sinks;
- b) Support for research and development for resilient and adaptive business models that take advantage of the extensive areas of indigenous vegetation;
- c) A climate change levy or tariff, so that larger emitters such as international shipping and the aviation industry, for example, pay for extensive reforestation across the DOC estate, or peatland and wetland restoration;

¹ Local Government Act 2002, version as at 13 July 2021, “Section 10 Purpose of local government. (1) The purpose of local government is—
(a) to enable democratic local decision-making and action by, and on behalf of, communities; and
(b) to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future.”

- d) A benefit or incentive for landowners, including private landowners, to maintain wetlands and forests, including pre-1990 forests; and for retaining native forest on private land, which could be used to offset farm emissions. This would include adaptive uses. The current carbon return for indigenous forest takes some years to create a benefit.

Recommendation 5

The National Adaptation Plan should provide economic incentives, subsidies, compensation or credits for areas where zero emissions can be achieved on a regional basis.

Recommendation 6

That greater provision is made in the National Adaptation Plan for increasing the natural removal of emissions via sinks, as part of achieving the net-zero goal and economic support given to Communities that support these sinks.

Recommendation 7

That the Climate Adaptation Bill works with Communities to promote education and hazard risk understanding so Communities understand safety and resilience measures. This may limit unnecessary appeals on natural hazard provisions in district and regional plans, and limits appeals to points of law only.

Recommendation 8

- a) That the Climate Adaptation Bill and/or the National Adaptation Plan provides for the Government to, where necessary, make available public conservation land or Crown land for managed retreat for West Coast communities, in exchange for severe hazard land which can be utilised for indigenous biodiversity restoration and conservation.
- b) That the legal provisions for exchanging PCL be amended to provide for swaps of severe hazard risk land for managed retreat to suitable areas of PCL, and the process enabled to be fast-tracked if needed in an urgent or emergency situation.

Recommendation 9

The Climate Adaptation Bill requires/encourages that infrastructure providers and adjoining landowners liaise and collaborate to ensure that natural hazard risk to both infrastructure and private land can be jointly avoided or mitigated.

Recommendation 10

The National Adaptation Plan should support a level of resource use to enhance management and enable communities to be economically and socially resilient, for example, river run grazing, and biomass harvesting in ETS forests.

Feedback

WCRC does not support the NAP actions for the NPSIB and the Environmental Reporting Act without knowing the detail in the final documents.

Recommendation 11

- a) Include an action to recognise council's rating district protection structures as critically important and necessary at certain stages of managing climate change impacts from natural hazards.
- b) Government agencies should ensure there is meaningful engagement/referencing, with local authorities and existing rating district flood protection schemes, when making decisions on riverbed concessions; with particular emphasis on the downstream schemes and infrastructure put in place by towns and communities, for example, the Joint Greymouth Floodwall Committee.

Recommendation 12

Amend the transport actions or add an action to investigate opportunities for freight transportation to be shifted from road to rail and/or sea.

Recommendation 13

The Government makes it a top priority to work with the insurance industry, local government and other relevant agencies to develop options.

Recommendation 14

Central Government needs to keep local government informed of the findings of research on the regional economic impacts of climate change adaptation.

Introduction

The West Coast Regional Council (the WCRC) appreciates the opportunity to submit on “Te mahere urutaunga a-motu (tuhinga hukihuki): Draft national adaptation plan” (NAP), and the accompanying consultation document on managed retreat.

The Council recognises some of the concerns and risks raised about:

- The environmental, economic, social and cultural impacts of climate change, and adapting to them;
- The need to ensure equitable outcomes for all people and communities, and that outcomes do not result in increasing inequalities between groups;
- The extent to which legislation and central government policy should direct local government planning provisions.

Different regions will have different hazard issues, and our submission outlines some issues that are specific to the West Coast. The National Adaptation Plan (NAP) and National Adaptation Bill (NAB) need to be applicable in all regions, however, be customised to cater for the differing characteristics of the regions.

The WCRC’s general comment is that the NAP outlines climate change workstreams across government, but there is limited information on new initiatives to better support the transition of communities to a resilient, low carbon future. Likewise, the accompanying consultation document on managed retreat provides little information on good practice and lessons learnt from the experiences of the Kapiti Coast and Matata’s natural hazards, and managed retreat from eastern suburbs following the Christchurch earthquakes, that could feed into the NAB.

There are three parts to the Council’s submission:

- A list of recommendations and feedback;
- Council’s responses to some of the questions in the NAP, and issues with Bill provisions; and
- Comments on proposed actions in the NAP.

Due to workload, only a small number of questions in the NAP and consultation document are responded to.

The submission details the feedback to key aspects that impact the West Coast and gives some discussion on each issue.

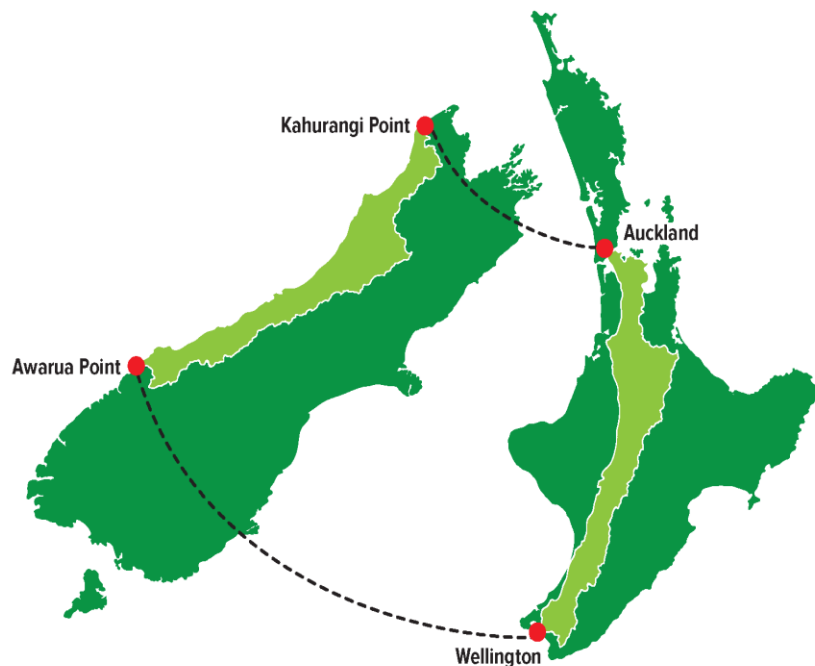
Council's comments on managed retreat are also woven into two of the issues identified under the question of what Council wants in the National Adaptation Bill.

The Council's views in this submission are consistent with the Council's submissions on the "Phasing out fossil fuels in process heat" consultation document, and the draft Emissions Reduction Plan in May and November 2021 respectively, which are attached as Appendices 1 and 2.

About the Submitter

The West Coast Regional Council (WCRC) is the local authority for a region covering a vast area with a sparse population. Extending from Kahurangi Point in the north to Awarua Point in the south, this is the approximate distance from Wellington to Auckland.

Map of New Zealand to highlight 600km length of West Coast Region compared to distance between Auckland and Wellington



The West Coast region stretches the equivalent distance of that between Auckland and Wellington

WCRC works closely with the regions’ three territorial authorities (the Buller, Grey and Westland District Councils). Outside of the main towns of Westport, Greymouth, Reefton and Hokitika, the region’s relatively low population of approximately 32,600 is spread across smaller settlements and rural communities. It is important that implementation of the National Adaptation Plan (NAP) is beneficial to the social, economic, and cultural well-being of all West Coast communities and the natural environment.

Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio (Poutini Ngāi Tahu – PNT) are mana whenua of Te Tai o Poutini (the West Coast). Our Mana Whakahono ā Rohe (Resource Management Act - Iwi Participation Arrangement) captures the intent of the Council and Poutini Ngāi Tahu to progress our relationship in accordance with the Treaty of Waitangi partnership between iwi and the Crown.

The Tai Poutini West Coast 2050 Strategy states:

West Coast Economic Development Vision

The West Coast will become a thriving and prosperous region - working together to drive innovation through better utilisation of our unique natural resources will enable us to grow and care for our communities and our environment.

The Tai Poutini West Coast 2050 Strategy also forms part of the WCRC submission as Appendix 3.

The Conservation Estate comprises 84.17% of the West Coast land area, with an additional 1.55% administered by Land Information New Zealand (LINZ). This leaves 14.28% of land available for private ownership. The land in the Conservation estate and Crown ownership is not rateable by local authorities. This land is an integral part of New Zealand's carbon performance².

The West Coast covers 1.9 million ha of land managed by the DOC West Coast/Tai Poutini Conservancy, around 84 per cent of the region's total area. LAWA website: The West Coast's land cover profile is characterised by: A predominance of forest cover (about two thirds of land area (64%)), of which most is indigenous forest.

Primary industries account for 23% of the Region's economy.

² New Zealand's Greenhouse Gas Inventory 1990-2019. Volume 1, Chapters 1-15. Section 6.4

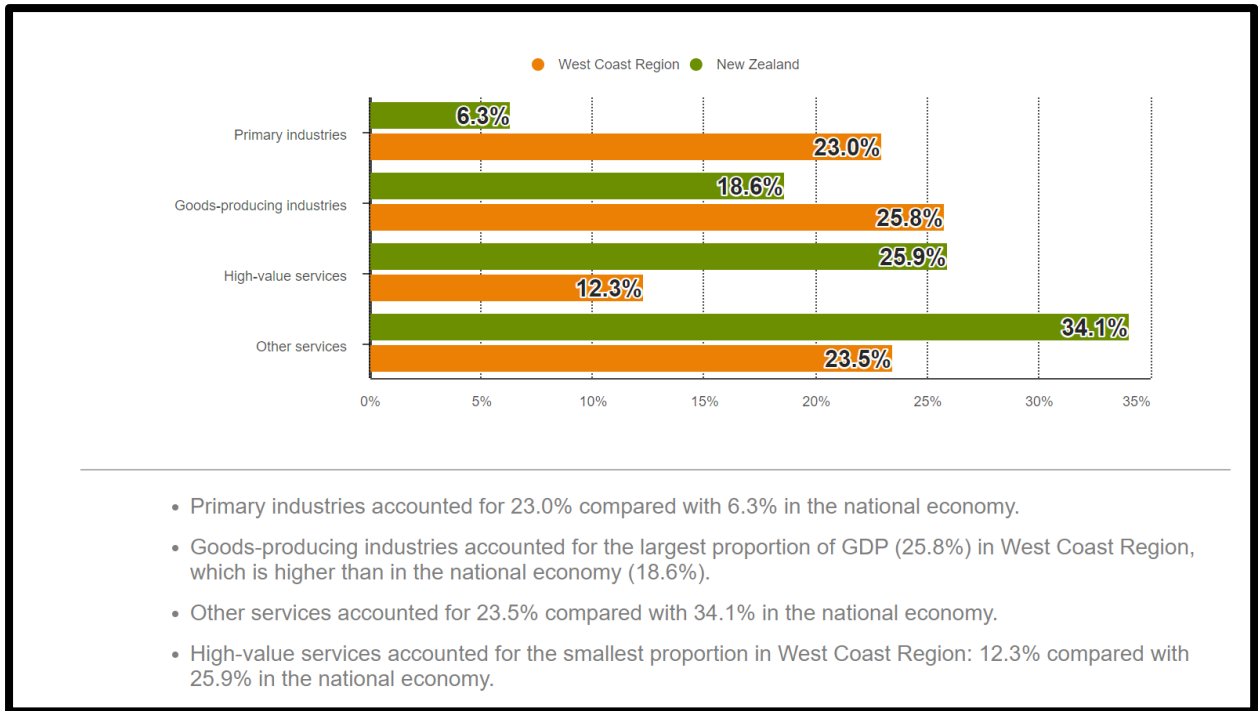


Figure 1 West Coast Annual Economic Profile 2021 Share of total GDP. Source: Infometrics

Responses to consultation questions, and key issues

To prepare feedback, WCRC staff consulted with our Councillors on some of the questions in the Consultation document. Poutini Ngāi Tahu were asked if they wanted to provide input into the submission. The following are responses to questions, and key issues that the Council’s Resource Management Committee and staff identified with the proposed National Adaptation Plan (NAP), and what needs to be in the National Adaptation Bill (NAB).

How is climate change impacting the West Coast?

Climate Change is adversely impacting the West Coast in the following ways:

- Storm surge – examples include
 - Loss of recreation and roading infrastructure at Cobden, Jellyman Carpark due to Sea surge,
 - Hokitika - loss of land due to sea surge and flooding at the river mouth,
 - Carters Beach coastal erosion,
 - Bruce Bay coastal erosion

- Adverse rainfall events saw flooding in Westport’s Buller River, Franz Josef’s Waiho River and the Hokitika River causing flooding; these and many other events affecting bridges, roads, land stability
- Glacial melt – Franz Josef and Fox Glaciers affecting bridges, roads, land stability
- Landslides blocking and closing main roads causing delays for locals, tourists and delivery of goods and services (including in remotes areas of the Alpine Passes, Glaciers and Haast), damaging railway lines, and closing key walking/biking tracks on public conservation land
- Weather patterns – dry period during summer 2021/2022.

Other future potential effects arising from climate change include:

- Increased costs of:
 - constructing, repairing, maintaining or moving infrastructure
 - Provision of new protection structures
 - Monitoring and warning systems
 - Development and enhancement of utility services
- Loss of income through changes to rating base
- Indirect economic impacts through land use changes, eg legislative changes to retain natural forest cover taking land out of production.

What are the key actions that are essential to help the West Coast Region adapt?

- Infrastructure
- Reliable sources of energy
- Hazard areas
- Economic assistance for low socio-economic landowners who have to retreat/relocate to areas with less hazard risk, to obtain accommodation where insurance is insufficient to cover the cost of a new build.
- Economic assistance for existing and new businesses and industries to adapt to a lower emissions future and achieve a thriving economy for communities’ social and cultural wellbeing. Positive enabling messaging from central government as opposed to reforms and proposed regimes that focus on what should not be done.

Which actions do you consider to be most urgent? Please list them.

- Protection Structures for certain Communities – Franz, Hokitika, Westport
- Protection and development of networks: transportation and utility services
- Elevation of the investigation into the development of sea freight as a key transportation mode for the West Coast.
- Assurance that energy infrastructure will be in place prior to requirements from the move away for fossil fuel sources for transportation and heating.

Are there any actions that would help ensure that existing inequities are not exacerbated? Please list them.

- Allowing support for adaptive industry
- Supporting and providing economic incentives for West Coast communities to retain indigenous forestry and wetlands as carbon sinks
- Economic incentives that strengthen the economy as opposed to rules that constrict the economy. The region should be encouraged to research and develop alternative uses for West Coast resources such as:
 - gravel extraction from rivers or
 - the region becoming self-sufficient through the development of a bio-fuel plant
-

There is a considerable area of indigenous forest and wetlands remaining on the 14.X% of non-conservation land on the West Coast, compared to other regions. The National Policy Statement for Freshwater Management, the National Environmental Standard for Freshwater, and the Draft National Policy Statement for Indigenous Biodiversity have restrictions on the use of land with Significant Natural Areas (SNAs) of terrestrial forest/bush, and natural wetlands., to protect their mainly ecological values. These national restrictions are having, and will continue to have, a significant adverse economic and social impact on rural property values in the region, and on future generations of current private landowners. Council is aware of a growing number of private landowners with protected SNAs and natural wetlands on their land, who had intended to either sell their land for money as an inheritance for their children and grandchildren, or for their own retirement, but are finding that their land has lost monetary value, and is difficult to sell.

The SNAs and wetlands on the West Coast currently have little or no economic value, but landowners are stuck, being unable to develop these areas for economic return. This makes the large land areas unsustainable in terms of economic wellbeing of our Community, but New Zealand as a whole is gaining from the emissions targets and New Zealand's overall carbon budgets. While the Government recognises the national contribution of terrestrial SNAs, wetlands, and non-significant indigenous forest as carbon sinks for reducing carbon emissions, West Coast landowners are not recognised as contributors nor are they receiving any benefits in return. LAWA website: The West Coast's land cover profile is characterised by: A predominance of forest cover (about two thirds of land area (64%)), of which most is indigenous forest. The West Coast region is also not recognised for the contribution the Conservation estate contributes to the overall climate adaptation.

The West Coast has been promoting the tourism potential of the natural environment. Many SNAs and natural wetlands have the same or similar "representative" ecological values, so there is a limited number of SNAs and wetlands that can provide income from alternative sources such as eco-tourism, for example. New eco-tourism ventures based on SNAs and wetlands are likely to be reliant on international tourists, which may become unsustainable in light of another global crisis such as the Covid pandemic, and it may take some time for their numbers to return to pre-Covid levels.

Since no compensation is forthcoming from the Government for the loss of economic value of West Coast land with terrestrial SNAs and wetlands present, the only other potential economic value that Council is aware of for these areas is to have a system of economic incentives for private landowners to be able to receive some benefit from maintaining their SNAs, wetlands and non-significant indigenous forest. It is imperative for the economic and social wellbeing of West Coast people and communities that the Government provides economic incentives for West Coast carbon sinks. Refer to Recommendation 2 in our submission for what the Councils seeks from the Government on this matter.

Are there any actions not included in this draft national adaptation plan that would enable you to assess your risk and help you adapt?

The WCRC appreciates the support given through Kanoa for the Climate Resilience Programme.

The WCRC request the NAP consider additional support requirements to provide support and resourcing for science and research. Particularly monitoring for small remote communities most at risk from aggrading rivers and increased rainfall intensity.

What role do you think asset owners, banks and insurers, the private sector, local government, and central government should play in:

a. improving resilience to the future impacts of climate change?

b. sharing the costs of adaptation?

The WCRC appreciates the support given through the Climate Resilience Programme to protect our communities most at risk from flooding. The effect of climate change on our short river catchments means greater flood risk to our communities.

Local government must make key decisions on:

- how to use and manage land in response to natural hazards, for example, the Te Tai o Poutini Plan (TTPP - combined District Plan for the West Coast)
- responsibilities to plan for and invest in protection.
- assets and property at risk from the impacts of climate change.

Local government enhances community resilience through public education and local planning processes.

Many councils are already addressing the impacts of climate change and proactively integrating climate risk into current and future planning.

Banks and insurers need to work with central and local government to develop fair and innovative ways of equitably supporting those who must relocate accommodation, community services and businesses to less hazardous areas.

Key to the success of these initiatives is a move in the Government reforms from what regions cannot do to an incentive focussed stance highlighting how regions can grow and develop under the new regulatory framework.

As part of the RMA reforms the Government is expecting to introduce the Climate Adaptation Bill by the end of 2023, setting out the managed retreat framework. What level of detail do we want the Government to put in the Climate Adaptation Bill (CAB)?

Process, principles and science priority is required to ensure communities get the best outcomes to ensure their safety and resilience. It is unhelpful for national direction to be guidance only. Communities and local government need to understand national priorities to give an indication on what level of science to adopt and when retreat will best keep communities safe from natural hazard risk and effects.

Set national direction on natural hazard risk information through the National Planning Framework, to enable management and climate adaptation.

Issue: risk, and cost, of litigation

The Climate Adaptation Bill (CAB) should provide adequate direction to keep communities safe and resilient. Support should be given to communities most at risk to ensure they understand the science being used to assess their safety. A 'front-end' approach is required to ensure there is nation-wide consistency to managing risk and safety. If safety and resilience is left up to local authorities, communities can get involved in litigation on natural hazard provisions in district and regional plans. Litigation could be limited if communities are supported to better understand the science behind their safety and resilience. Councils can spend a lot of money on having to litigate hazard rules in plans, this money would be better spent on a joined-up approach to education in consultation.

Government should fund the calculation of the economic benefit of retreat versus ongoing costs of the status quo then propose an economic package that incentivises managed retreat, whether it be through taxation holidays or subsidies to recognise the social and cultural sacrifices of relocation.

The document indicates that Government is going to put new guidance around natural hazards planning for climate resilience and adaptation in the CAB. This will come too late for the TTPP, which is going to be notified for submissions in the next two months.

While Council is not opposed to national guidance in principle, this often takes a considerable time to become available for councils to use. For example, guidance on implementing some of the NZCPS 2010 policies has only become available in the last three years, such as Policy 11 Indigenous biodiversity.

National guidance is, by nature, very general in order to apply to all regions. This often means that it is not useful for guiding councils on how to deal with hazard issues specific to their region.

When the hazard rules in the proposed TTPP are publicly notified as required, it will be under current legislation. This means people can submit, and if they disagree with the Council's decisions they can litigate (appeal the provisions to the Environment Court), and WCRC must pay to defend that Court process. Council understands that the Whakatane District Council had to go to the High Court to defend their managed retreat plan provisions.

Under the current legislation, WCRC is caught between consulting with the public on new natural hazard provisions and giving people opportunities to be involved in the plan development process, and being open to litigation.

Council is also very concerned that once the CAB is enacted, people could appeal a natural hazard or managed retreat plan provision, when it may be a provision that the Government requires councils to have in their plans. It would be extremely unjust if the Council has no choice over adding such provisions to their plans. This situation would undermine local democracy. Local authorities need support to enable Community education and understanding in risk and resilience planning. The Government needs to consider a joined-up approach.

The Government is expecting to introduce the Bill by the end of 2023, which will set out the managed retreat framework. The Bill may have natural hazard provisions that do not allow appeals on natural hazard plan provisions, but the direction Government is taking with this is not clear yet.

Given the concerns raised above, the following recommendations from the WCRC's submissions on the "Phasing out fossil fuels in process heat" consultation document, are reiterated. These were also outlined in WCRC's submission to the draft Emissions Reduction Plan (see Appendices 1 and 2), and are relevant to our comments on what should be in the CAB:

Recommendation 1

A national adaptation plan must evidence a coherent, easy to understand, "whole of government" approach, that is globally and nationally consistent with Emissions targets and agreements, and is also consistent with the mandate of local government, which is to:

- a) enable democratic local decision-making and action by, and on behalf of, West Coast communities; and
- b) promote the social, economic, environmental, and cultural well-being of communities on the West Coast in the present and for the future.³

Recommendation 2

A nationally consistent, joined-up approach to Community education is required to ensure understanding of risk and resilience planning in our communities.

Recommendation 3

The WCRC requests that the Government, through the National Adaptation Plan, provides for:

- a) Economic incentives for the West Coast to transition to a low carbon, resilient future, while maintaining current carbon sinks;
- b) Support for research and development for resilient and adaptive business models;
- c) A climate change levy or tariff, so that larger emitters such as international shipping and the aviation industry, for example, pay for extensive reforestation across the DOC estate, or peatland and wetland restoration;
- d) A benefit or incentive for landowners, including private landowners, to maintain wetlands and forests, including pre-1990 forests; and for retaining native forest on private land, which could be used to offset farm emissions.

Recommendation 4

The National Adaptation Plan should provide economic incentives, subsidies, compensation or credits for areas where zero emissions can be achieved on a regional basis.

Additionally, the Council's submission (Pgs 12 and 14, attached in Appendix 2) on the Emissions Reduction Plan consultation document sought that *"sinks should be incorporated into a national emissions "mitigation" plan so that both emissions "reduction" and "recovery" are provided for."* Council reiterates this in Recommendation 5 of this submission for the NAP.

³ Local Government Act 2002, version as at 13 July 2021, "Section 10 Purpose of local government. (1) The purpose of local government is—
(a) to enable democratic local decision-making and action by, and on behalf of, communities; and
(b) to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future."

Recommendation 5

That greater provision is made in the National Adaptation Plan for increasing the natural removal of emissions via sinks, as part of achieving the net-zero goal and economic support given to Communities that support these sinks.

Recommendation 6

That the Climate Adaptation Bill works with Communities to promote education and hazard risk understanding so Communities understand safety and resilience measures. This may limit unnecessary appeals on natural hazard provisions in district and regional plans, and limits appeals to points of law only.

Issue: where to retreat to?

Council is concerned that there are few land options available on the West Coast for people or communities to retreat to if needed. This is an unavoidable, geographical reality throughout the region, as in many instances the only place to retreat to is either public conservation land (PCL), or an area adjoining PCL. While coastal communities may need to retreat inland and to higher land in the future, this also brings a risk of relocating in areas where landslides could occur from heavy rain and/or wind. Provision needs to be made for West Coast people to move to PCL with a lower hazard risk where necessary. This could be done by way of:

- A land swap;
- Offset planting or pest management of a swapped severe hazard area in exchange for retreating to areas of PCL or Crown land;
- Having low hazard areas on terraces.

Recommendation 7

- a) That the Climate Adaptation Bill and/or the National Adaptation Plan provides for the Government to, where necessary, make available public conservation land or Crown land for managed retreat for West Coast communities, in exchange for severe hazard land which can be utilised for indigenous biodiversity restoration and conservation.
- b) That the legal provisions for exchanging PCL be amended to provide for swaps of severe hazard risk land for managed retreat to suitable areas of PCL, and the process enabled to be fast-tracked if needed in an urgent or emergency situation.

Issue: Lack of collaboration and cost-sharing between infrastructure agencies and landowners with avoiding and mitigating hazards

Council is aware of situations on the West Coast where infrastructure and private land are at risk of damage from a natural hazard, but the assessment of avoidance or mitigation works by the infrastructure provider appear to have not taken into account the consequential effects on the adjoining landowner or the lifeline provision of the infrastructure. In some instances, Waka Kotahi roads benefit from the embankments funded by Rating Districts.

There is a disproportionate funding of the cost of natural events that fall on the community due to the visibility of the floods impacting communities as opposed to other service providers and infrastructure owners.

For example, the Buller Bridge at Westport has large trees caught around the abutments, with the risk of the additional sediment build up and debris undermining the structural integrity of the bridge. However, if Waka Kotahi has not included maintenance costs for addressing this issue, they do not fund the removal of debris. The bridge infrastructure is also used for supplying various utility services to Westport, and from Council's perspective these services providers do not fund maintenance caused by the Buller River.

At Hari Hari, the Wanganui River is threatening to break through its banks and preventive action could avoid the bridge being damaged. The adjoining landowner downstream, whose land is at risk of being flooded if the River breaks out, has therefore had to pay for protection works via the Council's Rating District.

Affected and at risk parties need to be able to better work together so that costs can be efficiently and fairly shared between the infrastructure provider and the landowner.

Recommendation 8

The Climate Adaptation Bill requires/encourages that infrastructure providers and adjoining landowners liaise and collaborate to ensure that natural hazard risk to both infrastructure and private land can be jointly avoided or mitigated.

System-wide Actions

Pg 36: Future work programme proposals: Develop 3D coastal mapping Timeframe: Years 1–2

Some 3D coastal mapping of natural hazards has already been done for the Te Tai Poutini Plan. The WCRC seeks that the Government be reimbursing councils who have already paid for the mapping to be completed.

Pg 37: Produce guidance and tools for monitoring and evaluating the impact of adaptation initiatives Timeframe: Year 3

Three years seems too long, the timeframe needs to align with the timeframes for RMA reforms.

Natural Environment

Pgs 43-51:

Council has concerns about who pays to achieve the objectives, and implement the actions in the NAP. Most of the actions are about protecting the natural environment, especially indigenous biodiversity, from climate change. Council is not opposed in principle to this, but there is nothing in this section about using natural resources for mitigation and adaptation, for example, continuing to recognise that the use of gravel and rock resources for protection works is important for adapting to climate change.

In terms of the West Coast indigenous forest cover, the West Coast indigenous forest area contributes from 15 to 25% of the pre-1990 forest cover. A significant contribution to New Zealand's overall emission budget. The West Coast Region receives no economic return for this contribution.

Additionally, the recently released Emissions Reduction Plan (Pg 286) includes an action: *"...to consider opportunities to incentivise and encourage those management activities, including mechanisms to enable the recognition of additional carbon storage in pre-1990 forests"*. Council understands that in the 1990-2019 New Zealand Greenhouse Gas Inventory⁴, *"...all of New Zealand's forests, both those planted for timber production and natural forests managed for conservation values, are considered managed*

⁴ Ministry for the Environment. 2021. New Zealand's Greenhouse Gas Inventory 1990–2019. Wellington: Ministry for the Environment. Volume 1, Chapters 1-15, Pges 294-297.

forests.....”, and the contribution of pre-1990 forest land to carbon stock changes is accounted for in New Zealand’s baseline emissions and removals. In Recommendation 2 of our submission, Council seeks that, rather than ‘encouraging’ and ‘recognising’ incentives, the NAP **provides for** (economic) incentives for the West Coast to maintain carbon sinks.

Recommendation 9

The National Adaptation Plan should support a level of resource use to enhance management and enable communities to be economically and socially resilient, for example, river run grazing, and biomass harvesting in ETS forests.

Pg 46; Implement the proposed National Policy Statement on Indigenous Biodiversity Timeframe: Years 1–6 (2022–28)

WCRC cannot support this action without knowing the detail of the final NPSIB. What is actually involved in the requirement that “...councils and landowners must consider creating ecological corridors in response to climate change.” **Who will pay for these ecological corridors?** Council submitted on the Draft NPSIB in March 2020, raising the following concern about requirements in the NPSIB to manage climate change impacts on indigenous biodiversity:

“Outcome sought: 3.5 Resilience to climate change

We are concerned about the requirement to add provisions in regional policy statements, plans or regional biodiversity strategies to promote the resilience of indigenous biodiversity to climate change. We understand that this is about keeping all, or representative populations of indigenous species alive through climate events, and not having ‘all eggs in one basket’. However, West Coast Councils do not have the knowledge or capacity to achieve this. We are concerned about the associated cost implications, and whether positive outcomes for the West Coast will actually be achieved. This is a relatively new concept that we anticipate will evolve considerably in the future. The West Coast DoC Conservancy has considerably more knowledge about the effects of climate change on indigenous biodiversity than local councils, and are already undertaking actions in this area, for example, by relocating skinks from two coastal locations where coastal erosion is threatening their habitat.

To implement this IR, West Coast Councils would need to obtain information from DoC, duplicating the work DoC are already undertaking.....If central government wants councils to undertake work in this space, it will need to fund them accordingly.”

West Coast communities should not be penalised for protecting indigenous biodiversity. Private landowners with wetlands or Significant Natural Areas (SNAs) on their land are not being compensated for protecting nationally significant values, while the nation benefits from West Coast native forests and wetlands functioning as carbon sinks. See the recommendation following the section below.

Pg 48: Supporting actions: Reform the Environmental Reporting and Monitoring System to allow better measurement of environmental change

Council cannot support this action without knowing the detail in the final Act. Council recently submitted on the Environmental Reporting Act 2015, one of our main points is that if the Government intends giving regional councils additional monitoring responsibilities to meet national reporting requirements, then the Government should pay.

Feedback

WCRC does not support the NAP actions for the NPSIB and the Environmental Reporting Act without knowing the detail in the final documents.

Pg 50: Develop mātauranga Māori indicators of climate impacts on the natural environment Timeframe: Years 1–2 (2022–24)

WCRC support matauranga Maori indicators to be developed at a hapu level, to provide for local variations in indicators. Guidance is required on how this will be made available to regional councils.

Infrastructure

Pgs 63, 64:

The infrastructure actions appear to not include Council rating district protection structures; rating district protection structures should be recognised as critically important and necessary to protect communities and lifeline infrastructure. Such structures are included in the West Coast Regional Policy Statement's definition of regionally significant infrastructure.

Government agencies should ensure there is meaningful engagement/referencing, with local authorities and existing rating district flood protection schemes, when making decisions on riverbed concessions. To

not engage with them in any departmental concession process on the rivers that threaten infrastructure already installed, potentially compromises the integrity of existing schemes and therefore the considerable inter-generational investment.

Recommendation 10

- a) Include an action to recognise council's rating district protection structures as critically important and necessary at certain stages of managing climate change impacts from natural hazards.
- b) Government agencies should ensure there is meaningful engagement/referencing, with local authorities and existing rating district flood protection schemes, when making decisions on riverbed concessions; with particular emphasis on the downstream schemes and infrastructure put in place by towns and communities, for example, the Joint Greymouth Floodwall Committee.

Pg 65: Critical actions: Develop a methodology for assessing impacts on physical assets and the services they provide

Pg 66: Scope a resilience standard or code for infrastructure

Pg 69: Support the integration of climate adaptation and mitigation in new and revised standards

WCRC support a standard for engineering design to withstand the effects of climate change after the consideration of all possible mitigation options. This needs to be accompanied with a standard for cost benefit analysis and an agreed threshold of when retreat becomes the alternative to protection.

Pgs 67-69: Develop and implement the Waka Kotahi Climate Change Adaptation Action Plan

Pg 68: Integrate adaptation into Waka Kotahi decision making

A multi-pronged approach to actions is needed recognising that not all places will be able to implement the actions to the same degree or achieve the same reduction in emissions. For example, investment in public transport and active transport is not going to result in the same level of emission reduction on the West Coast in comparison to other urban areas, due to the West Coast's widely distributed population.

Other actions such as progressing the rail network investment programme could be beneficial for the West Coast provided that freight can be shifted from road to rail.

There is no mention of coastal shipping within these actions. As with rail, the actions should include an opportunity to shift freight from road to sea.

Recommendation 11

Amend the transport actions or add an action to investigate opportunities for freight transportation to be shifted from road to rail and/or sea.

Communities

Critical actions

Pg 78: Raise awareness of climate-related hazards and how to prepare

Pg 80: Connect communities to wider response and recovery support

The Government will need to ensure that NEMA have sufficient funding and resourcing to deliver outcomes. Provision for resilience rural communities needs to be made in disaster planning, as these communities form an integral part of our national identity.

It is assumed that in the event of AF8, the West Coast will be dependent on access from the sea as opposed to the traditional roading and rail network therefore investment in sea transportation is considered critical.

Pg 79: Building community resilience through social cohesion Timeframe: Years 2–5 (2023–27)

It is unclear what this means for West Coast communities who are already isolated, and whose livelihoods make it necessary to live remotely, due to distance.

Pg 79: Improve natural hazard information on Land Information Memoranda (LIM) Timeframe: Years 1–4 (2022–26)

Council supports in principle this action. The Department of Internal Affairs (DIA) made changes to LIM requirements in 2021. Regional Councils are now responsible for sharing information with district councils relating to the regional councils' natural hazard knowledge.

Economy and financial system

Pg 85: Exposed local economies failing to adapt

The Government needs to take care not to put onerous regulation on economic activities that could have the perverse outcome of potentially 'hollowing out' farming communities, for example, the NPSIB requirements, and the freshwater regulations. Positive and supportive actions by central government that enable and incentivise communities is critical.

Pg 86: Infrastructure, business and housing assets are becoming less insurable

There are likely to be more insurance claims, greater damage repairs and higher premiums.

Pg 90: Develop options for home flood insurance issues

Research Strategy

Pg 105: Research priorities

Council agrees that this is a critical action, it needs to be given top priority for the Government to work with the insurance industry, local government and other relevant agencies to develop options. Councils can have appropriate provisions in their plans, but if someone's house is damaged or destroyed and they have no or insufficient insurance payout to purchase a home in a safer area, then this is the sector of the population that unfairly suffers from hazard effects. Poverty and equity need to be considered when considering housing alternatives. New Zealand has a current affordable housing problem, the Government needs to consider equity for housing for the future.

The research priorities do not include research on options for insurance. Insurance is clearly related to individual and community vulnerability. Central government enabling managed retreat could include incentivisation through Insurance issues.

Recommendation 12

The Government makes it a top priority to work with the insurance industry, local government and other relevant agencies to develop options.

Pg 96: Identify the impacts of climate change on regional economies

Recommendation 13

Central Government needs to keep local government informed of the findings of research on the regional economic impacts of climate change adaptation.

Other

Although the NAP Infrastructure actions for landfills focus on climate change-related effects on landfills, the high ETS levies currently being paid by West Coast District Councils relating to waste disposal should be addressed in this Adaption Plan. This is because reducing methane discharges to air is a future adaptation issue for small councils. The escalating ETS levies relate to the level of methane produced by landfills. There appears to be no National Plan for small regional discharges of landfill methane. Small regional landfills that will process less than one million tonnes of municipal solid waste in their working life are not required to fit a landfill gas capture system to collect methane, and the cost of installing such a system would be very expensive for the small rating base to bear. However, the West Coast District Councils are penalised by having to pay a high ETS levy for the discharge.

The government needs to address waste management at a national level by prohibiting nuisance waste production. Further assistance should be given to separation and treatment of organic waste and research and support for small scale Landfill Gas Collection systems (LFGC).

Recommendation 14

The NAP must address the unaffordable cost to small councils of methane capture from landfills, and the excessive penalty of ETS levies where the methane is not captured. This could include assistance in source separation of organic waste from Municipal Solid Waste, or assistance with an LFGC system that will not only collect present day methane but also legacy methane from capped cells.

This ends our submission.

Append submissions on “Phasing out fossil fuels in process heat” consultation document, and the draft Emissions Reduction Plan prior to circulating draft subm