Dear Sir/Madam

Environment Canterbury submission on *Action on agricultural emissions*

Thank you for the opportunity to provide feedback on the Government’s proposals to address greenhouse gas emissions from agriculture. Environment Canterbury strongly supports the Government’s action on climate change, including a renewed focus on how to tackle agricultural emissions. Environment Canterbury does not wish to comment at this time on the mechanisms for pricing agricultural emissions. We do, however, want to provide brief comment on the future role of Farm Environment Plans (FEPs).

In its *Actions on agricultural emissions* report, the Interim Climate Change Committee identified that FEPs with a climate change module will support farmers to reduce emissions. It also discussed prescribed good management practices. Integrated farm plans with a climate module are also part of the agriculture sector leaders’ proposed programme of action to 2025. This sits alongside existing government work assessing the future role of FEPs with regard to managing freshwater, and we expect to see more detail on the Government’s intentions in the near future with the release of the Essential Freshwater proposals.

What’s not yet clear is the role of regional councils if farm plans are to be made mandatory *and* are to be expanded beyond the management of on-farm environmental risks. If there is an intention for regional councils to play a role, the regional sector needs to be involved early. There are two key reasons for doing so:

- Firstly, there needs to be alignment across the various FEP-related work programmes. This includes across the different domains (e.g. water and climate) and from both a policy and implementation perspective.
- Secondly, gaining insight from the experiences of the regional sector, and particularly Environment Canterbury, will be highly valuable if FEPs are to be used for tackling agricultural emissions.

Environment Canterbury implemented a FEP and Audit framework as a statutory tool via the Land and Water Regional Plan (LWRP), and it became operative in 2016. Our FEP framework has proven to be an effective system for engaging with industry and driving farmers towards meeting freshwater quality outcomes, and we have learnt key lessons along the way. One key challenge has been the capacity and capability of industry professionals able to deliver robust FEPs and audits – it’s difficult to find industry professionals with extensive knowledge of all
farm systems and with the ability to conduct comprehensive assessments. This challenge will grow significantly should FEPs be expanded in scope and across the country.

Environment Canterbury will continue to support this work as it evolves, and we will be particularly interested in how on-farm actions to reduce emissions link to actions aimed at improving freshwater management. We again ask that the regional sector be included early in policy discussions should the government see a role for regional councils in implementing agricultural emissions policies.

Yours sincerely

Steve Lowndes
Chair