

## **The Greater Wellington proposed Natural Resources Plan for the Wellington Region**

Submission by:

**KapAg Ltd**

And further submissions on matters raised by:

**Federated Farmers**

**Beef and Lamb**

### **Introduction**

- 1 My full name is **Terry Graham Parminter**.
- 2 I am the Managing Director of KapAg Ltd an agricultural consultancy company based in Paraparaumu and operating throughout New Zealand.
- 3 I have a PhD in Management Systems from the University of Waikato (2010) and a Bachelor in Agricultural Science from Massey University (1979). I am certified with the NZ Institute of Primary Industries, NZ Association of Resource Managers and NZ Insitute of Horticultural and Agricultural Science. I have Massey University certificates in Advanced Nutrient Management and Dairy Effluent Design.
- 4 I have spent six years as a Farm Advisory Officer with MAF, six years as an agricultural systems scientist with MAF, thirteen years as a social scientist with AgResearch studying technology adoption by farmers and strategies for effective voluntary policies. I have over 100 papers published in agricultural, resource management and applied economics publications in New Zealand and Australia.
- 5 Since 2009 I have been self-employed as an agricultural consultant.
- 6 I have appeared as an expert witness for the Environment Court deliberating on the Waikato Regional Plan and the Manawatu Wanganui Regional Council One Plan. I also designed and led the public consultation process that has assisted to inform the planners preparing the proposed Natural Resources Plan.

## **Stream 1. Overall policy framework for the proposed plan, Beneficial Use and Development, & Areas and sites with significant mana whenua values**

### **Summary of evidence**

7 My evidence today will deal with the following:

- I support the submission from federated farmers for there to be a Section 32 report that brings together the cumulative impacts of the proposed policies and rules affecting farmers and growers.
- I support the need expressed by Beef and Lamb New Zealand for there to be a regional framework that guides Whaitua decision making with regard to the principles that they should use for water allocation and water quality.
- I support the contention by Federated Farmers that the section 32 reports have not fully considered their opportunities for developing voluntary change strategies working with primary industry organisations.

### **Primary Sector Section 32 Report**

Section 32 of the RMA (1991) requires the Council to assess the costs and benefits of taking action as they propose in the Plan.

On pages 3&4 of their submission, Federated Farmers state that:

**We register our very strong concern that the quality of cost-benefit analysis in the section 32 (s32) reports is manifestly inadequate across critical areas of the pNRP, including failure to provide explicit social impact assessment for the regional and catchment communities. In particular, we strongly recommend a s32 report for Primary Production is prepared prior to the hearing to inform proper consideration by the Hearing Panel including:**

I support Federated Farmers in their desire for an integrated section 32 report for primary producers. I have two concerns with this information currently being distributed across a number of reports. Farmers manage a range of natural resources daily as part of the normal farming activities including soils, air, and water both fresh and marine. It is quite difficult to go through each separate section 32 report to find all the relevant information. Secondly, the reports consider the management of natural resources in isolation from each other. However, farmers find that the management of each resource interacts with the management of all the others. Therefore planting to reduce soil erosion can affect the hydrology of wetlands and planting a riparian strip can conflict with drain clearing. All of these matters could be made a lot clearer for farmers and growers if they were brought together in a single section 32 report that estimated the overall impact of the proposed policies and rules on landowners in the primary sector.

### **Policy Principles for Whaitua Committees**

In Section 4.8.1 of the proposed Natural Resources Plan when it addresses discharges to land and water it states that, "Whaitua Committees will identify methods and timeframes to improve water quality ... These may be incorporated into the Plan by a future plan change or variation". In support of New Zealand Beef & Lamb, I contend that this section does not provide enough direction to the Whaitua Committees for them to carry out their function efficiently and consistently across the region. The Whaitua Committees have very capable people on them but they lack sufficient guidance in the Plan.

The plan should provide the Whaitua Committees with guiding principles. These principles should ensure consistency with regard to:

- The set of values that communities might consider.
- The range of objectives that relate to these values.
- Whether water quality should be by the allocation (e.g. averaging, grandfathering or natural capital) or the good-practice method, or some combination of these.

Without a consistent overarching framework it is quite possible that the Whaitua Committees may struggle to reach a policy resolution for their catchments. So far there is no Whaitua Committee ready to start considering policy options for their catchment, although the first committee was established in 2013. Without an overarching framework it is also likely that one or more catchments may have conflicting policy methods for addressing water quality particularly affecting Māori landowners and landowners with property in more than one catchment. There needs to be consistency in allocation across the whole region to ensure that the intent of the regional plan for water quality across the whole region to be maintained or improved can be realised.

### **Joint Voluntary Change Strategies**

On page 9 of their submission Federated Farmers make the point that Wellington Regional Council has not made a commitment to work with industry groups to develop and resource “jointly owned” strategies that can be effective at encouraging voluntary behaviour change without the costs (regional and personal) of developing and enforcing rules. I agree with Federated Farmers about this because the same point was made a number of times through the process of public and stakeholder process and because a strategically designed behaviour change process can be more effective than rules.

In Section 6.15 of the Plan (about other methods) it states that the Wellington Regional Council will collaborate with a range of other parties to develop “good management practice guidelines” to implement the policies in the plan. On its own this method is not enough to set and encourage behaviour change targets and support the strategic relationships needed to achieve them.

In addition to 6.15 the Plan needs separate methods each focussed on working with specific industry groups to achieve the priority objectives and policies for that industry group. As an example there should be an additional method,

“For the Wellington Regional Council to seek an alignment of its objectives and policies with the national strategies for Hort New Zealand, Wine, FAR, DairyNZ, Beef & Lamb, and Forestry. With those industries Wellington Regional Council will set behaviour-change targets in the short and long term and develop campaigns for achieving these.”

**Reference:** [http://www.regional.org.au/au/apen/2006/refereed/3/2863\\_parmintertg.htm](http://www.regional.org.au/au/apen/2006/refereed/3/2863_parmintertg.htm)

The published reference lists and compares a number of theoretical approaches to behaviour change. The paper concludes that, “Human behaviour change should be the focus of environmental policy interventions rather than environmental change its-self, as the expression of a desired behaviour is the most direct and certain way for policies to generate environmental improvements. The substantive policy approaches described in this paper are compatible with procedural policy approaches involving affected stakeholders to decide priorities and agreed policy mechanisms (Howlett and Ramesh 2003, p91). The resources made available for substantive policy interventions need to be matched to the size of the

environmental problem and the amount of inertia in the system before improvements may become apparent.

If we are to ensure that implementing voluntary policy approaches is going to create measurable environmental differences a number of key elements are required, including the following:

- Clear behaviour change objectives focussed and time-bound to match the resources available (Ajzen and Fishbein 1980, p29-39).
- Interventions that are planned based upon accepted theory and evidence as well as experience, to maximise the advantages for people to change towards more compliant behaviour (Donovan and Henley 2003, p236).
- The interventions are designed and implemented in consultation with the affected communities and implementation of these policies is co-ordinated with the activities of other (statutory and non-statutory) agencies (Morriss et al 2001).
- Enough information is provided to guide decision makers and help them develop any new skills that they may need for successful implementation of the desired behaviour changes (Ministry for the Environment 1998, p10).
- Intentional communication to persuade decision makers of the merits of change and to build their confidence in their ability to make decisions and achieve predictable measurable results<sup>1</sup> (Parminter 2002, Parminter and Wilson 2004, Petty and Cacioppo 1986).

A strategy can redefine social norms by providing role models and social reinforcement for desired practices and sufficient consistent reprobation to reduce deviant behaviour (Watson 2004<sup>a</sup>). It may provide economic incentives as compensatory payments for externalised benefits (e.g. public good effects) or to assist landowners with high capital costs (Parminter 2003).

Rules may still be included in a voluntary change strategy to restrain any behaviour that is socially unacceptable to the affected communities and in conflict with desired policy outcomes. These rules need to be rigidly enforced by the policy agency involved (Morriss et al 1998).

Every strategy for behaviour change needs regular and objective (formative) evaluation based on measuring the processes of behavioural change to provide early feedback about the need for policy changes that can improve the effectiveness of policy delivery (Patton 1997; Ajzen and Fishbein 1980).

In this way, policy strategies addressing natural resource issues, by applying theory based approaches for encouraging voluntary behavioural change to achieve socially desired outcomes will be more effective than using only deterrent (rule-based) strategies for the same purpose.

The opportunities for Wellington Regional Council to put in place effective voluntary policy strategies for achieving human and social change has not been fully explored in their section 32 reports. Further, if it is the intention of Wellington Regional Council to work with industry groups to enhance the effectiveness of their education and behaviour-change programmes they will need to set this out more clearly in the plan by describing clear targets for behaviour change and the key strategic relationships required to enable these targets to be achieved.