

BEFORE THE HEARING PANEL

IN THE MATTER OF the Resource Management Act 1991 (the Act)

AND

IN THE MATTER OF submissions on Proposed Change 1 to the
Regional Policy Statement for the Wellington
Region under Part 4 of Schedule 1 of the Act

AND

IN THE MATTER OF The report on the topic of *Climate Change –
General* pursuant to Section 42A of the Act on
behalf of Wellington Regional Council for
Proposed Change 1 Hearing Stream 3

The report on the topic of *Climate Change –
Agricultural Emissions* pursuant to Section 42A
of the Act on behalf of Wellington Regional
Council for Proposed Change 1 Hearing
Stream 3

BETWEEN

WELLINGTON REGIONAL COUNCIL

AND

WAIRARAPA FEDERATED FARMERS

**STATEMENT OF EVIDENCE OF PETER MATICH ON BEHALF OF WAIRARAPA
FEDERATED FARMERS**

(PLANNING)

14 August 2023



Federated Farmers of New Zealand
Lambton Centre
Level 4
117 Lambton Quay
PO Box 715
WELLINGTON 6140
Contact: Elizabeth McGruddy
Phone: 027 217 6732
Email: emcgruddy@fedfarm.org.nz

1. Introduction

- 1.1 My name is Peter Matich. I am an employee of Federated Farmers of New Zealand (Inc) and am presenting evidence as a planner for Wairarapa Federated Farmers ('WFF').
- 1.2 I hold a Bachelor of Planning Degree and a Bachelor of Arts Degree from the University of Auckland and a Master of Environmental Studies Degree from Victoria University. I have 32 years' experience in resource management planning in New Zealand in a variety of public and private sector roles, including a range of work on rural and farming issues. I am a Member of the New Zealand Planning Institute.
- 1.3 I have read, and am familiar with, the Environment Court's Practice Note 2023 for expert witnesses. Other than where I state that I am relying on the evidence of another person or publication, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

2. Scope of evidence

- 2.1 I address aspects of the following reports prepared under Section 42A ('Section 42A report') of the Resource Management Act 1991 ('the Act') on behalf of Wellington Regional Council for Hearing Stream 3:
- Report by Jerome Wyeth subtitled *Climate Change – General* dated 31 July 2023.¹
 - Report by Jerome Wyeth subtitled *Climate Change - Agricultural Emissions* dated 31 July 2023.²
- 2.2 I focus solely on aspects of Mr Wyeth's recommendations concerning proposed Objective CC.3 and proposed Policy CC.5 where our opinions differ. I have not considered other aspects of Mr Wyeth's above reports, nor any other reports for this hearing stream. Any omission to specifically respond to matters contained in these

¹ <https://www.gw.govt.nz/assets/Documents/2023/07/S42A-Report-HS3-Climate-Change-General.pdf> accessed 1 August 2023.

² <https://www.gw.govt.nz/assets/Documents/2023/07/S42A-Report-HS3-Climate-Change-Agricultural-Emissions.pdf> accessed 1 August 2023.

various reports should not be interpreted as agreement with such matters. My responses are set out below under the topic sections to which the reports relate.

2.3 I have read the following documents:

- The hearing reports pursuant to section 42A of the Act mentioned above.
- RPS PC1 and accompanying reports and memoranda submitted under Section 32 of the Act.
- The National Planning Standards 2019.
- The National Emissions Reduction Plan 2022³ ('ERP').
- The National Adaptation Plan 2022⁴ ('NAP').
- Wairarapa Federated Farmers Submission on RPS PC1.

3. Wairarapa Federated Farmers concerns with RPS PC1

3.1 WFF lodged a submission pursuant to Schedule 1 of the Act.

3.2 WFF are concerned that labelling of various provisions with the moniker, "FW", will mean that some provisions that should not be considered under the Freshwater Planning Process in Schedule 1 Part 4 of the Act ('FPP'), risk not being properly scrutinised. This includes provisions related to climate change identified the table appended to WFF's submission.

3.3 WFF are also concerned that provisions in RPS PC1 relating to climate change are out of step with Government directions on reducing agricultural Greenhouse Gas ('GHG') emissions. WFF are seeking that all proposed RPS PC1 amendments relating to climate change, including Objective CC.5 and Policy CC.3 be deleted.

3.4 WFF are further concerned that RPS PC1 was notified prior to 30 November 2022, which is when amendments to section 61 of the Resource Management Act 1991 came into force. This section of the Act requires regional policy statements to

³ *Te hau mārohi ki anamata: Towards a productive, sustainable and inclusive economy* AOTEAROA NEW ZEALAND'S FIRST EMISSIONS REDUCTION PLAN. May 2022. <https://environment.govt.nz/assets/publications/Aotearoa-New-Zealands-first-emissions-reduction-plan.pdf>

⁴ *Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi Adapt and thrive: Building a climate-resilient New Zealand* AOTEAROA NEW ZEALAND'S FIRST NATIONAL ADAPTATION PLAN. August 2022. <https://environment.govt.nz/assets/publications/climate-change/MFE-AoG-20664-GF-National-Adaptation-Plan-2022-WEB.pdf>

consider any national emissions reduction plan and national adaptation plan. I note at the same time at this amendment came into force, section 70A of Act was repealed. Section 70A had previously prevented regional councils from making rules relating to discharge of greenhouse gases.

- 3.5 In this regard, the section 32 Report for RPS PC1 cites “*a requirement for regional councils and territorial authorities to “have regard to” emission reduction plans and national adaptation plans published under the CCRA when preparing regional policy statements, regional plans, and district plans*”⁵ as part of the regulatory and policy context the Council is relying on to notify RPS PC1. The Section 32 Report authors go on to state that “*The commencement of these amendments is to align with timeframes for the Emission Reduction Plan and National Adaptation Plan under CCRA and to allow time for national direction on greenhouse gas emissions to be developed. Final versions of both plans have now been published.*”⁶
- 3.6 I note that Clause 26 of Schedule 12 to the Act requires that any proposed policy statement, plan, change or variation or resource consent that was notified prior to the new provisions in Section 61 of the Act coming into force, must be determined as if these ‘climate change amendments’ had not been enacted. I understand that this would void any current proposed RPS PC1 provisions that purport to give effect to the ERP and NAP. However, this may be a matter for lawyers to confirm.
- 3.7 Having regard to the above, I have provided this evidence to assist the Hearing Panel evaluating aspects of proposed RPS objective and policy framework that I consider problematic from a planning perspective, namely proposed Objective CC.3 and proposed Policy CC.5, regardless of the legality of the proposed RPS provisions relating to alignment with the ERP and NAP. I consider this objective and policy to present significant flaws from a resource management and planning perspective.

⁵ Section 32 report, para 152.

⁶ Section 32 report, para 153.

4. Council Planner’s recommendations on Wairarapa Federated Farmers submission in the section 42A report subtitled ‘Climate Change – General’

Inclusion of climate change provisions in the FPP process

4.1 I agree with Mr Wyeth’s recommendation in paragraphs 59 and 60 of the s42A report that climate change and regionally significant issues 2, 3 and 5 in Chapter 3.1A, and Objective CC.1 should be part of the standard S1P1 process.

4.2 For broadly similar reasons as advanced in Mr Wyeth’s analysis in paragraphs 59 and 60 of the section 42A report, being that the subject of these provisions are ‘much broader’ in scope than *freshwater management*, or are only indirectly focussed on freshwater management and/or primarily focussed on a non-freshwater matter, it is my opinion that Objectives CC.4, CC.5, and the amendments to Objective 20, and Policies CC.6, CC.7, CC.12, CC.14, CC.15, CC.18, FW.8 and Methods CC.4, CC.6 and CC.8, should also be part of the standard S1P1 process. In this regard, I reiterate my assessment at paragraphs 4.20 and 4.21 of my Evidence in Chief for Hearing Stream 1.

Rationale for including climate change provisions in RPS Change 1

4.3 Regarding the question of justification for including climate change provisions in RPS PC1, Mr. Wyeth’s analysis at paragraphs 65 and 66 (in partial reliance on the section 32 Report⁷ and the technical evidence of Jake Roos) iterates ‘key planning and effects-based reasoning for addressing climate change through Change 1’ to support his recommendation (at para. 68) that submissions on this point should be rejected, these being:

“Climate change is a significant resource management issue that is having significant adverse effects on the environment and people and communities in the region.

There is a recognised role for the RMA, the planning system and local government to reduce GHG emissions to complement national policy direction and initiatives...

Addressing the adverse effects of climate change is, ... directly relevant to achieving the purpose of the RMA... and the role of a RPS to address resource management issues of significance to the region...

⁷ In particular at pg. 19-24, 36-40, 62-78 of Section 32 Report.

It is widely accepted through international agreements and the scientific community that there is an urgent need to act to avoid the risk of catastrophic climate change impacts...

*At a broad level, there is evidence that the long-term costs of inaction are significantly higher than the costs of acting now*⁸

- 4.4 I agree that these may be important reasons for a regional policy statement to include provisions to address the effects of climate change. Nevertheless, I do not agree that the concerns of submitters, including WFF, have about climate change provisions in RPS PC1 are merely about ‘kicking the can further down the road’ as implied by Mr. Wyeth.⁹ I specifically address Objective CC.3 and Policy CC.5 to highlight what in my opinion are obstacles that make these provisions difficult to practically implement.
- 4.5 In relation to WFF and other submitters concerns about cost and benefit analysis, Mr. Wyeth states the following:

*“Another common concern with the climate change provisions in Change 1 is that these are not supported by a robust cost-benefit analysis and section 32 evaluation. In response, I note that the climate change provisions in Change 1 are primarily aimed at setting the direction on the outcomes to be achieved in the region (objectives), policies that are to be given effect to through regional and district plans, and non-regulatory policies and methods. It is not practicable, nor efficient or particularly useful in my opinion, to undertake a detailed cost-benefit assessment of objectives aimed at long-term climate change outcomes that will be given effect to through future plan changes. I fully acknowledge and agree with submitters that these future plan changes to give effect to key policies (e.g. Policy CC.5 and Policy CC.8) need to be supported by a robust analysis and section 32 evaluation which is discussed further in relation to those provisions.”*¹⁰

- 4.6 With respect, I do not consider that all climate change provisions in RPS PC1 are merely aimed at ‘setting the direction on outcomes’ as Mr. Wyeth suggests. Objective CC.3 is of particular concern as it has targets for GHG reduction and is intended to be given effect to through regional and district plan implementation, including through resource consents and notices of requirement. In my opinion, this merits analysis of

⁸ For the sake of brevity, footnotes and subtext from Mr Wyeth’s report are not repeated here.

⁹ S42A General report - Para 67.

¹⁰ Op cit. para 69.

costs and benefits related to implementation, which is not evident in the Councils section 32 report.

Sector specific targets – in particular Objective CC.3

- 4.7 Plainly, as Mr. Wyeth asserts at paragraph 211 of the 'General' section 42A report, Objective CC.3 does not set a specific target for the agricultural sector. In this regard, proposed Objective CC.3 is as follows:

To support the global goal of limiting warming to 1.5 degrees Celsius, net greenhouse gas emissions from transport, agriculture, stationary energy, waste, and industry in the Wellington Region are reduced:

- (a) *By 2030, to contribute to a 50 percent reduction in greenhouse gas emissions from 2019 levels, including a:*
 - (i) *35 percent reduction from 2018 levels in land transport-generated greenhouse gas emissions,*
 - (ii) *40 percent increase in active travel and public transport mode share from 2018 levels, and*
 - (iii) *60 percent reduction in public transport emissions, from 2018 levels, and*
- (b) *By 2050, to achieve net-zero emissions.*

- 4.8 One of the aims of this objective is to achieve net zero GHG emissions in the Wellington Region by 2050. In my opinion, this would need to entail assessment of cumulative GHG emissions in the Wellington region, and I will return to the significance of this later in my evidence.

- 4.9 Proposed Table 1A in RPS PC1 sets out how proposed Objective CC.3 would be given effect to. This includes implementation through a range of policies and methods, including Method 1 (District Plan Implementation), Method 2 (Regional Plan Implementation), and Method 4 (Resource Consents, Notices of Requirement, when changing and reviewing Plans). This signals that this Objective is intended to be implemented on a case-by-case basis (amongst other methods). I return to the implications of this on the practical ability to implement this objective later in my evidence.

- 4.10 The sector-specific GHG emissions for 'land transport-generated', 'active travel and transport mode share', and 'public transport', each have targets that contribute to the overall target of 50 percent reduction from 2019 levels. Nevertheless, the target of 50

percent GHG emissions reduction from 2019 levels by 2030 and net zero by 2050 would apply to all gases, including agricultural methane. Aggregating all other types of GHG emissions within the region that may be needed to ‘contribute’ to achieving the overall regional target of 50 percent reduction from 2019 levels, presents a level of uncertainty about who needs to do what to meet the regional emissions reduction target.

- 4.11 Not only is there uncertainty for emitters of all gases, but the inclusion of specific sector targets for ‘land transport generated greenhouse gas emissions’ and ‘public transport emissions’ in Objective CC.3 are, in themselves, not all that straightforward. For instance, there is no definition of ‘land transport’ in the RPS (nor in RPS PC1) nor in the National Planning Standards. I note that ‘Land Transport’ is defined in the Land Transport Management Act 2003 (‘LTMA’) as follows:

“land transport—

(a) means—

(i) transport on land by any means:

(ii) the infrastructure, goods, and services facilitating that transport; and

(b) includes—

(i) coastal shipping (including transport by means of harbour ferries, or ferries or barges on rivers or lakes) and associated infrastructure:

(ii) the infrastructure, goods, and services (including education and enforcement), the primary purpose of which is to improve public safety in relation to the kinds of transport described in paragraph (a)(i).”

- 4.12 Assuming this LMTA definition is possibly to be relied upon in implementing Objective CC.3, this implies a need to factor in emissions from vehicles and vessels operating within the Wellington Region (including the coastal marine area), whether they are arriving, departing, travelling within, or merely passing through. As Objective CC.3 is anticipated to be implemented through regional and district plan implementation, including resource consents, where cumulative effects may be required to be assessed, this presents significant data access and analysis challenges for individual applicants. In my estimation, this would be beyond the capability of councils/consent authorities to accurately determine, let alone applicants or lay-persons.
- 4.13 Difficulties gathering and assessing emissions data will in-part be driven by uncertainty about meeting the targets in Objective CC.3. For instance, if targeted

emission reduction for land transport is not met, then presumably other GHG emitters in the region would have to strive harder to decrease their own GHG emissions to ensure the overall 2030 and 2050 targets in Objective CC.3 are met.

4.14 I note that Mr. Wyeth alludes to “further work that needs to be undertaken to develop a regional emission reduction plan to assess the best approach to achieve GHG emission reduction for each sector including agriculture...”¹¹ The fact that this work has not presently been done underscores my concerns about uncertainty for sectors whose emissions are implicitly targeted by the objective. The wording in proposed Objective CC.3 and its associated implementation methods has a clear implication that consent authorities and applicants will have to undertake emission reduction assessments, regardless of when this intended ‘regional emission reduction plan’ is produced.

4.15 It is feasible that Objective CC.3 could end up requiring agricultural emitters to reduce agricultural methane emissions further than the target in section 5Q(1) of the Climate Change Response Act 2002 (which was adopted by amendment to the CCRA on 14 November 2019). This CCRA target requires that.

“(1) *The target for emissions reduction (the 2050 target) requires that—*

...

(b) *emissions of biogenic methane in a calendar year—*

(i) *are 10% less than 2017 emissions by the calendar year beginning on 1 January 2030; and*

(ii) *are 24% to 47% less than 2017 emissions by the calendar year beginning on 1 January 2050 and for each subsequent calendar year.’*

4.16 I note the methane target in the CCRA 10% reduction by 2030, but it is variable between 24-47% less (yet to be further determined) by 2050. I also note that these targets are reiterated in the ERP.¹²

4.17 I also draw the Hearing Panel’s attention to Action 13.1.2 of the ERP, which envisages that producers’ emissions reports and farm plans form part of the

¹¹ Op. cit. para 209.

¹² Op. cit. p249.

Government's plan to achieve agricultural methane emissions reduction targets.¹³ The ERP presents an integrated plan to reduce agricultural greenhouse emissions in a consistent way for the entire country. I further note (reiterating my statement at paragraph 4.29 of my Evidence in Chief for hearing Stream 1) that the sector targets in the ERP are still being disputed, and the Climate Change Commission is currently reviewing Aotearoa New Zealand's emissions reduction targets¹⁴.

- 4.18 Several submitters, including WFF, have expressed concern about the relationship between RPS PC1 climate change provisions and higher order documents. A consequence of variance between the emission reduction targets in CCRA/ERP and emissions reduction targets in regional plans, is a possible perverse outcome whereby the target for the whole country under the CCRA/ERP is being shouldered more in regions that have higher regional GHG emissions reduction targets. In the absence of a thorough cost and benefit analysis of implementing Objective CC.3, it is difficult to estimate the impact of such a discrepancy for Wellington's GHG emitters.
- 4.19 Moreover, the potential discrepancy between GHG emissions reduction burdens in different regions is not necessarily a straightforward matter of higher-targets-in-some-regions-versus-lower-targets-in-others. It is complicated by the nature of regional and district plan implementation under the RMA. In this regard, there is a degree of uncertainty built into the way in which Objective CC.3 is intended to be implemented under RPS Methods, 1, 2 and 4.
- 4.20 Implementing Objective CC.3 through District and Regional Plan implementation through *resource consents* and *notices of requirement* (or, for that matter, any approval pathway that is not a *permitted activity* in a district or regional plan, or otherwise permitted by any regulation or national environmental standard) entails the following complex inter-related problems:
- (i) Any type of activity that is part of a sector for which there is no sector-specific target could feasibly be subject to consent authority requirement for assessment of the cumulative effect of that proposal's 'contribution' to regional GHG emissions under Objective CC.3(b) on a case-by-case basis, as part of each resource consent application assessment. In my estimation, assessments of cumulative effect of agricultural methane emissions at the regional level are

¹³ Op. cit. p255.

¹⁴ <https://haveyoursay.climatecommission.govt.nz/comms-and-engagement/p2050/>

likely to be complex. Cumulative effects may require assessment of matters outside many individual applicants' abilities to control, such as the emissions of other individuals, groups, communities, or industrial sectors.

- (ii) Complicating factors for cumulative impact assessment include data access and analysis (already touched on in relation to land transport and access to technical expertise) and issues around potential differences in mitigation outcomes that depend in-part on different methods used to estimate impact of GHG emissions (i.e., depending on whether Global Warming Potential or a Split-gas approach is used).
- (iii) Case-by-case assessment of consent applications presents a risk of 'patchy' analysis and inconsistent application of policy. This can lead to all sorts of inequities in resource allocation (including inequities within the region in shouldering the burden for regional emissions reduction).
- (iv) Inconsistency in the application of policy to different cases can arise from variance in interpretation of plan requirements. In this regard, New Zealand planning literature on the role of plan implementers in determining plan outcomes under the Act, highlights that plan outcomes are as likely to be affected by whomever is implementing the plan(s), as they are by the content of the plan provisions themselves, regardless of the planning evaluation method used to measure success/outcomes.¹⁵ This conundrum would equally apply to whichever method was employed to assess individual sets of emissions. However, it will not make a flawed objective and policy framework easier to administer.
- (v) Approximately one-third of land within the Wellington Region is comprised of pastoral farming use (37 percent of land as of 2019¹⁶) incorporating some 1,319 farms that are 20ha or more each, with farm owners and operators who each potentially need to provide cumulative assessments of agricultural methane emission reduction. In my opinion, the relative size of this sector in the Wellington Region translates into potential for considerable discrepancy

¹⁵ For example, see Berke, P., Backhurst, M., Day, M., Ericksen, N. J., Laurian, L., Crawford, J., & Dixon, J. (2006). *What makes plan implementation successful?: An evaluation of local plans and implementation practices in New Zealand*. *Environment and Planning B: Planning and Design*, 33(4), 581-600.

¹⁶ 'Pastoral farming' includes beef, dairy, sheep, grain and assorted other types, amounting to some 298,418.252ha within the Wellington Region in 2019 (Statistics NZ figures. <https://www.stats.govt.nz/indicators/farm-numbers-and-size>). Horticulture comprised an additional 1,905.585 ha in Wellington Region in 2019.

amongst consent assessments in pursuing the overall reduction target in Objective CC.3.

- 4.21 In view of the above issues, it is my opinion that there is potential for a range of difficulties in implementing Objective CC.3.
- 4.22 Regarding submitter concerns about adopting an overall ‘all gases’ target of net zero emissions by 2050 (versus the target for agricultural methane in the CCRA and ERP), Mr. Wyeth relies on the assertions of Mr. Jake Roos that shortcomings in the use of GWP100 for managing short-lived GHGs in overestimating the impact of agricultural methane emissions “*does not present any issues for managing GHG emissions as it is widely accepted that on warming, cutting emissions of both GHGs is the wisest course of action to stay below the threshold.*”¹⁷
- 4.23 I agree that reducing GHG emissions is important to the task of mitigating further disruptive impacts of global warming and climate change. However, in my opinion an emphasis on *the importance of reducing GHG emissions* alone will not ensure effective implementation of climate change mitigation policy in the RPS. Understanding how policy needs to be implemented, including overcoming barriers in achieving consistent implementation, is an important part of the emissions-reduction equation that I have highlighted some significant difficulties with.
- 4.24 In this regard, I doubt the amendments suggested by Mr. Wyeth in paragraph 214 of the section 42A report would remedy these difficulties. Given the aim of ‘achieving net zero by 2050’, requiring all GHG emissions to ‘contribute’ to this would only further confuse the case-by-case assessment that is intended by the RPS for implementation of this objective.
- 4.25 In relation to the further work the Council may do on developing a regional emissions reduction plan, Mr. Wyeth suggests that this may result in changes to the targets in Objective CC.3 over time.¹⁸ The fact Mr. Wyeth is signaling this gives me some doubt about the targets in Objective CC.3. Presumably, the targets could either be proven not stringent enough, or they will be shown to be too stringent. However, everyone

¹⁷ Op. cit. para 209.

¹⁸ Op. cit. Para 210.

will only find out when the future regional emissions reduction plan is produced, and it is not yet evident what the timeline for producing this future plan is.

- 4.26 Meanwhile emitters of agricultural methane would (presumably) need to expend additional resources assessing their emissions under the RPS Objective (in addition to having to assess their emissions under the CCRA and ERP). If the future regional emission reduction plan shows that regional agricultural methane emissions should not have been included in assessment under Objective CC.3, the case-by-case assessment of these emissions in the meantime could amount to unnecessary additional expense tantamount to a consent-sponsored field-trial of regional agricultural methane emission limits, for little or no environmental benefit.
- 4.27 While the moral imperative to act to halt ever-more disastrous impacts of climate change may entail (what Mr. Roos terms) 'a political judgement'¹⁹ to adopt the targets in Objective CC.3, I am concerned that this could come at the cost of an inequitable burden on emitters in the Wellington Region. This is especially if it only ends up amounting to experimenting with a political conviction that Wellington GHG emitters should strive harder to cut GHG emissions than emitters in other regions.
- 4.28 By Mr. Wyeth's own admission,²⁰ a detailed analysis of costs and benefits of implementing more ambitious regional GHG reduction targets has not been carried out by the Council under section 32 of the Act. Therefore, the extent of cost impact on the agricultural sector can only be speculated upon.
- 4.29 However, given that over a third of land in the Wellington region is pastoral farmland comprised of some 1,319 farms, I am concerned that pursuing regional targets for reducing emissions that include agricultural methane (that are potentially stricter than the Government's requirements in the CCRA) would present complex and interrelated practical difficulties in assessment, to applicants as well as on consent authorities, and there would be costs associated with this.
- 4.30 Given the potential difficulties with implementing Objective CC.3 through regional and district plan implementation and resource consents outlined earlier in my statement, should the hearing panel determine that the RPS PC1 provisions for climate change

¹⁹ Op. cit. para 196.

²⁰ Op. cit. para 69.

stand, despite the terms in Clause 26 Schedule 12 of the Act, I think it would be prudent to delete part (b) of the Objective (and any related policies that seek to give effect to it), and delete the word 'agriculture' from the preamble in Objective CC.3.

4.31 In this regard, the targets for agricultural methane reduction in the CCRA and ERP are already Government policy. Even though the Government's targets may be reviewed from time to time to ensure the targets remain relevant, the risk to climate change of there being no requirement (implicit or otherwise) relating to agricultural methane in RPS Objective CC.3 would be low in my opinion.

5. Council Planner's recommendations on Wairarapa Federated Farmers submission in the section 42A report subtitled 'Climate Change – Agricultural Emissions'

Policy CC.5

5.1 My concerns with including agricultural methane emissions in Objective CC.3 outlined above would extend to Policy CC.5 that seeks to give effect to this objective. Given my opinion that agricultural methane emissions should be removed from Objective CC.3, in my view there would be no point in including Policy CC.5 and my preference would be this entire policy be deleted as a consequence.