

Open letter Feedback to the He Waka Eke Noa

Agricultural Emissions Pricing Proposal

We, a group of farmers, are presenting feedback to the He Waka Eke Noa (HWEN) Agricultural Emissions Pricing Proposal in an open letter format as we believe our feedback should be shared.

We are concerned that the options 1 and 2 in the HWEN consultation document are not sufficiently compelling and **do not provide a fair process**, they are **not informed by science**, they are not **administratively simple**, nor are undertaken in an **integrated manner** reflecting how agriculture as a land use impacts the environment.

If left unchallenged extensive hill country pastoral farming will become unduly afforested as the proposed emission pricing options place too much pressure on reducing emissions upon sheep, beef-cattle, and deer farming businesses, despite these rural land uses already having low and long-term steady-state stabilised emission profiles.

We believe there should be a pathway forward that inspires and imbues confidence for continued intergenerational farming as producers of food and other important products and services of value undertaken by farm activities and practice that has an acceptable low environmental footprint.

We are proposing an alternative that **advances and transforms HWEN farm-level option 1**.

We prefer the farm-level option as it gives individual farmers the responsibility for managing their farm business relative to expectations. Pricing must be more targeted and balanced using a **progressive tiered structure**, the administrative system should be underpinned by use of **existing business arrangements** to avoid duplication and minimise costs.

If you are supportive of the approach we are presenting,
we ask that you also submit feedback in kind.

Please present your feedback to HWEN before Sunday 27th March 2022
email: yourfeedback@hewakaekenoa.nz

Thank you

R. Burke, R. Dalrymple, B. Ensor, G. Gleeson, S. Hales, M. McCoard, K. Middelberg,
J. Somerville, J. Stevens, and K. Worsnop.

14th February 2022

Our Reasons for concern:

1. We believe all farmers should proportionately endure an emission pricing system that is progressive, so they understand and remain responsible for emissions which directly impacts global warming. *This will influence farmers to appropriately change their farming systems to reduce their emissions instead of just paying a tax.*
2. We think a progressive pricing system should be used on a per hectare basis with increased pricing for farmers with high emissions. *This single universal metric allows equal examination of emission across all farms and has a strong focus upon loss to the atmosphere and thus global warming.* This will assist stopping the needless blanket afforestation of our extensive pastoral hill country.
3. To reduce administrative overhead the pricing could be managed using pre-existing systems through the Inland Revenue (IRD).
4. We think achievable emission targets should be set representing the impact of warming emissions – biogenic methane (CH₄) warming neutral by 2030.
5. The manner of assessing a farm system must be integrated across the whole environment considering climate, freshwater, biodiversity, rural community, amenity, and other services of value.
6. The ‘early adopter’ farmers must be recognised, not penalised.
7. All sequestration on a farm has merit therefore it cannot be arbitrarily limited by the specified 2008 baseline year. All measurable carbon sequestration sinks must be included to enable a farmer to net off warming emissions; where science cannot presently measure with accuracy there must be scope for future inclusion.
8. The farmer having achieved target warming emission reduction should no longer have to endure continued taxation.

We are very aware and firm about what future success looks like:

1. **We firmly believe that every farmer has a personal responsibility for the usage of natural resource, i.e., the farm, in a manner having an acceptable footprint upon the holistic environment as envisioned by Fit For A Better World Te Taiao.**
2. **We describe the farm that reflects this as Farming Fits the Land**
3. **We highlight there are currently large differences in farm systems production levels and notably the externalised loss of contaminants, including greenhouse gases, to receiving environments and this must be recognised in targets and policy in an equitably fair manner.**

We do not have all the answers and our proposal may have weakness; however, we present an advanced and transformed option 1 as a possible alternative and invite you to assist further refinement by participating in discussion so we can more equitably move forward towards a low emission future.