

**From:** section 9 (2) (a)  
**To:** section 9 (2) (a); [Nicola Grigg MP](#); [Mark Cameron](#); [Andrew Hoggard](#); [Mike Butterick MP](#); [Mark Patterson](#); [Penny Simmonds](#)  
**Subject:** INV134 Invite attached from Groundswell NZ  
**Date:** Sunday, 28 January 2024 5:18:01 PM  
**Attachments:** [image001.png](#)  
[Ag MP Meeting invite - 27.01.24.pdf](#)

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Please see invitation to meet with Bryce and Laurie attached.

Kind regards,

section 9 (2) (a)

section 9 (2) (a)



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# Groundswell NZ

PO Box 93, GORE 9740

27 January 2024

Todd McClay  
Penny Simmonds  
Nicola Grigg  
Mark Cameron  
Andrew Hoggard  
Mark Paterson  
Mike Butterick

We write to request a meeting with you all, either in Wellington or in Southland if you are in our region for the Southern Field Days (14-16 Feb). We would be available to travel either the week of 26 February or week of 18 March.

Groundswell has received extensive feedback from farmers (we are sure you have heard it too) who are committed to improving the environment but are hamstrung by impractical, costly and time-consuming regulations.

We acknowledge the changes you have in the pipeline, but are concerned that the big pressure points on farmers in the next 12 months will be Freshwater Policies such as consents, regional plan roll-outs, freshwater farm plans along with SNA's and SASM.

The opportunity to meet with you would allow us to give you the grass-roots view of what is happening to farmers in these areas and help you to plan next steps to give farmers confidence.

Kind regards  
**GROUNDSWELL NZ**

**Bryce McKenzie & Laurie Paterson**  
Co-founders

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**From:** [Groundswell NZ 2020](#)  
**To:** [Christopher Bishop \(MIN\)](#); [Todd McClay \(MIN\)](#); [Penny Simmonds \(MIN\)](#); [Nicola Grigg \(MIN\)](#); [Andrew Hoggard \(MIN\)](#); [Mark Patterson \(MIN\)](#); [Simon Court](#); [Stuart Smith](#); [Mark Cameron](#); [Miles Anderson](#); [Mike Butterick](#)  
**Subject:** COR287 Letter from Groundswell NZ about RMA reform and Freshwater Farm Plan Regulations  
**Date:** Wednesday, 27 March 2024 6:29:40 PM  
**Attachments:** [20240327 Letter to Government re RMA Section 6 and FWFPs.pdf](#)  
[Groundswell NZ - Freshwater Farm Plan Regulations destined to fail.pdf](#)

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Dear Ministers and MPs

Please see attached a letter from Bryce McKenzie and Laurie Paterson, co-founders of Groundswell NZ, about RMA reform and Freshwater Farm Plan Regulations.

Also attached is a document detailing the Groundswell NZ position on Freshwater Farm Plans, referred to in the letter.

Kind regards

section 9 (2) (a)

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27 March 2024

To Ministers and Members of Parliament.

We appreciate recent action by the Government to fix unworkable environmental regulations, including the repeal of Labour's RMA reforms and suspension of Significant Natural Areas (SNAs).

However, there are 2 laws that urgently need addressing:

The first is **Section 6 RMA matters of National Importance**, including wetlands, lakes and rivers (a), landscapes and features (b), SNAs (c), sites and areas of significance to Māori (e) and heritage (f).

The problem with SNAs identified by the government equally apply to all RMA Section 6 matters. The inherent problem is not SNAs, it is Section 6 and its lack of respect for people, property owners and property rights, impacts on property values, and the way in which councils implement the legislation.

Groundswell NZ receives more complaints about Section 6 matters than any other legislation. We are currently fielding concerns from across the country from distraught property owners being impacted by Section 6 issues. This issue brings disruption into people's lives, wastes millions of dollars and fails to deliver on long term environmental outcomes.

The most recent case is the draft Waitaki District plan where our LGOIMA request has revealed that 540,000 hectares (75% of the district land area) is proposed to be captured under Section 6 regulatory classifications. Waitaki residents have initiated a petition opposing these Section 6 classifications.

The longer this Section 6 legislation stays in place, the more community upheaval it will cause and at a huge cost. It is urgent that the government take steps to halt the implementation of Section 6 as soon as possible.

The second legislation requiring urgent action is the **Freshwater Farm Plan Regulations 2023**. Again, we are fielding concerned calls from around the country, the latest from Marlborough farmers - frustrated that their council is ploughing ahead with the Freshwater Farm Plan legislation regardless. Farmers had assumed that this legislation was to be paused as part of the coalition governments rewrite of Labour's unworkable Freshwater reforms.

It is unclear whether the coalition government intends to continue with Labour's Freshwater Farm Plan legislation, one that is widely opposed by farmers. This legislation is flawed in so many ways (see attached), that a substantial rewrite or repeal is necessary. Given this, it will be a huge waste of council and farmer resourcing, money and time to meet existing deadlines and requirements - when

at the very least, a significant rewrite is required. It is urgent that these deadlines are extended, coupled with a clear indication to regional councils that the legislation will change.

Groundswell requests clarification on these issues so we can report back to our supporters what they can expect. We are available to discuss these issues - in person or via Zoom.

Yours faithfully,

**Bryce McKenzie & Laurie Paterson**  
**Groundswell NZ**

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**Groundswell NZ**

## Freshwater Farm Plan Regulations destined to fail

The Freshwater Farm Plan Regulations 2023 were established by the previous (Labour) government. Under this legislation, all livestock and arable farmers with over 20 hectares and all horticulturists with over 5 hectares require a certified Freshwater Farm Plan (FWFP), as prescribed by the legislation. The dates to have a certified FWFP vary across the regions from 2024 through 2026.

While the new coalition government have indicated there will be changes to the legislation, this does not recognize the legislation is destined to fail for several key reasons:

- The legislative framework that underpins the Freshwater Farm Plan regulations does not provide for practical, cost effective and workable farm plans in many situations.
- As identified by MfE from the original submission process, mandatory Freshwater Farm Plans were opposed by “...a large number of sheep and beef farmers.” The legislated farm plans do not have the buy-in of farmers and have been strongly resisted by one of the first of the 2 areas to go live – Aparima in Southland. Groundswell NZ has called for farmers to boycott the Freshwater Farm Plans.
- The legislation’s inflexibility does not account for the constant change in markets, weather, and natural events that impact farming. It fails to recognize that every farm and farming family are different and operate within constantly changing budgetary constraints.
- The legislation undermines the value of farm plans and represents a major lost opportunity to implement a valuable environmental management tool for farmers. The FWFP’s do not empower farmers in environmental stewardship/Kaitiakitanga, which is a critical component of successful integrated farm environmental planning.

The legislation has multiple flaws and impractical elements including:

1. A one-size-fits-all approach, extensively prescribed, including around what is included in FWFPs, certification and auditing requirements, and information to be submitted to regional councils.
2. It is heavily focused on ticking boxes – an unavoidable consequence of the way the legislation is drafted.
3. The extensive FWFP legislated requirements will add to the compliance overload and stress on farmers.
4. Farmers pay for the costs of preparing the farm plans, certification, and auditing (ongoing cost) meaning less money available for environmental spend on the ground.
5. There is no clarity around peoples’ privacy and private property information. Regional Councils must keep records of all farm plans including farm details, maps, action plans, certification details and audit grades and may request a full copy of a FWFP. Because this farm plan system is to be implemented by Regional Councils under Government legislation, (rather than an industry led initiative), the public information obligations apply. There are

examples where information submitted by farmers through farm plans, funding applications and consents is being used for other purposes without the farmers knowledge. If anyone claims that private property information is protected, ask them where it says that in the legislation.

6. Farmers are required to meet all existing rules (including unworkable ones) relating to freshwater. Thousands of farmers will face a certified plan they cannot practically or financially implement, and many will face the prospect of having to undertake major changes in how and what they farm. An analysis of the FWFP system in Canterbury revealed that it will be impossible for most hill and high-country farmers to implement their certified plan and pass the audits without a change away from farming livestock.
7. While on the one hand, the role of certifiers is extensively prescribed, on the other hand, they (unlike council staff) are given a huge amount of unfettered power to require farmers undertake actions even if the farming activity is permitted or the catchment has no or minor freshwater issues.
8. The new legislation changes the ball game for existing farm plans, which will need to be updated and brought into line with the new requirements. This legislation overrides all existing successful voluntary industry and regional council farm plans. All that work over many years undermined.
9. The extensive obligations on certifiers and auditors and increased risk/liability implications are causing a reluctance to take on these roles. The farmer certifier/auditor relationship will be fraught with frustration and conflict - an inevitable outcome from inflexible and unworkable legislation.
10. Resourcing the certifier and auditor roles and additional regional council staff will be a challenge. There will be few, if any, practitioners currently qualified enough and with the legislated competencies to be a certifier or auditor.
11. The siloed focus on freshwater in the FWFP legislation is contrary to integrated management principles and will deliver perverse outcomes. Farmers will be forced to prioritize funding to freshwater actions detailed in their Freshwater Farm plans (to pass audits), and this will at times be at the expense of greater priorities such as protecting biodiversity and weed and pest control.
12. There is huge uncertainty around how FWFPs will meet Te Mana o te Wai (the priority is the vital importance of the life supporting capacity of water) and the Catchment Context, Challenges and Values (CCCV) approved by the regional councils, particularly around how contaminant limits such as nitrogen would apply and where community values determine that there should be heavily restricted or no farming in the catchment.
13. Certifiers, auditors, and regional councils are placed in the unenviable position of having to enforce a legislated requirement that is widely opposed by farmers. Conflict is inevitable.
14. Every farmer requires a state-prescribed FWFP, regardless of the effects or intensity of their activities, or whether there are any water quality issues within their catchment. This unfettered state control is a significant departure from the effects-based approach of the RMA.



Groundswell NZ has developed an alternative approach to farm plans in The Groundswell Solution, including integrated farm plans that empower farmers in environmental stewardship and a focus on actions prioritising the most important environmental risks and issues.

Jamie McFadden  
Groundswell NZ environmental spokesperson  
s9(2)(a)

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Groundswell NZ

**From:** [Andrew Hoggard \(MIN\)](#)  
**To:** [Groundswell NZ 2020](#)  
**Bcc:** s9(2)(a)  
**Subject:** RE: COR287 Letter from Groundswell NZ about RMA reform and Freshwater Farm Plan Regulations  
**Date:** Wednesday, 8 May 2024 9:01:00 AM  
**Attachments:** [CORM-2350 Bryce McKenzie.pdf](#)  
[image001.jpg](#)

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Dear s9(2)(a)

Please see attached a letter from Hon Andrew Hoggard responding your concerns about RMA reform and Freshwater Farm Plan Regulations.

Kind Regards,



**Office of Hon Andrew Hoggard**  
Minister for Biosecurity  
Minister for Food Safety  
Associate Minister of Agriculture (Animal Welfare, Skills)  
Associate Minister for the Environment

**Email:** [@...](#) | **Website:** [www.Beehive.govt.nz](http://www.Beehive.govt.nz)  
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand  
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Authorised by Hon Andrew Hoggard, Parliament Buildings, Wellington

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**From:** Groundswell NZ 2020 <@>  
**Sent:** Wednesday, March 27, 2024 6:29 PM  
**To:** Christopher Bishop (MIN) <@>; Todd McClay (MIN) <T.McClay@ministers.govt.nz>; Penny Simmonds (MIN) <@>; Nicola Grigg (MIN) <@>; Andrew Hoggard (MIN) <@>; Mark Patterson (MIN) <M.Patterson@ministers.govt.nz>; Simon Court <@>; Stuart Smith <Stuart\_@>; Mark Cameron <@>; Miles Anderson <@>; Mike Butterick <@>

**Subject:** COR287 Letter from Groundswell NZ about RMA reform and Freshwater Farm Plan Regulations

Dear Ministers and MPs

Please see attached a letter from Bryce McKenzie and Laurie Paterson, co-founders of Groundswell NZ, about RMA reform and Freshwater Farm Plan Regulations.

Also attached is a document detailing the Groundswell NZ position on Freshwater Farm Plans,

referred to in the letter.

Kind regards  
s9(2)(a)

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# Office of Hon Andrew Hoggard

Minister for Biosecurity  
Minister for Food Safety  
Associate Minister of Agriculture (Animal Welfare, Skills)  
Associate Minister for the Environment



COR287/CORM-2350

8 May

Bryce Mckenzie  
Laurie Paterson  
Groundswell NZ  
[groundswellnz2020@gmail.com](mailto:groundswellnz2020@gmail.com)

Dear Bryan and Laurie,

Thank you for your letter of 27 March 2024 about Section 6 Resource Management Act (RMA) matters of National importance and Freshwater Farm Plan Regulations 2023 (FW FP). I am replying to you as the issues you raise relating to FW FPs fall within my portfolio responsibilities as Associate Minister for the Environment. I understand that my colleague, Hon Chris Bishop, has responded to you separately regarding section 6 RMA matters of national importance.

Sector groups and farmers have told us the current system is too costly and complex, and that improvements are needed. This is why the Government has recently announced that we intend to improve the freshwater farm plan system, so it is more cost-effective and practical for farmers. We believe that farm plans should be able to highlight the work that many farmers and growers are already doing to reduce the impact of farming activities on the freshwater environment, and we want to enable farmers and growers to find the right solutions that are tailored for their farm and catchment.

We want an enduring system to manage risks of farming on freshwater through the improvements that are made. It is important that councils and the community can have confidence in the robustness of the freshwater farm plan system as an alternative to local rules and consents.

We want to build on the good work of farmers in their regions while ensuring any improvements to the system do not result in sudden changes to plans already being developed. We are exploring how to make any changes fair for all farmers. As part of this, we may look into whether current requirements to complete a freshwater farm plan could be paused while improvements are developed.

Thank you again for writing.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Hoggard'.

Hon Andrew Hoggard  
**Associate Minister for the Environment**

**From:** section 9 (2) (a)  
**To:** section 9 (2) (a); [Andrew Hoggard](#); [Mark Patterson](#)  
**Cc:** "[Bryce McKenzie](#)"; "[Laurie Paterson](#)"; "section 9 (2) (a)"  
**Subject:** letter attached from Groundswell  
**Date:** Monday, 20 May 2024 12:31:06 PM  
**Attachments:** [image001.png](#)  
[Methane Review letter - 20.05.24.pdf](#)

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Please see attached.

Kind regards,

section 9 (2) (a)

section 9 (2) (a)



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20 April 2024

Dear Todd Maclay, Andrew Hoggard and Mark Patterson

We write to outline our concern regarding the upcoming Methane Science Review. We see this review as an excellent opportunity to provide the industry and government with a definitive framework to which agriculture's contribution to climate change can be assessed.

There are two main streams of research that the industry is seeking clarity on with regards to Methane;

1. The new research outlined by Happer and Wijngaarden which proposes water vapour dominates Methane within the radiative spectrum.
2. The current IPCC research (including GWP\*) and how could be applied to agriculture.

To accurately assess the warming effect of Agriculture there will need to first be a decision as to which of these two competing theories stands up to the detailed scrutiny of the review. To achieve this outcome, we believe there must be at least one expert in the field of **radiative spectrum analysis** on the panel, such as David Coe or person of similar qualifications.

We also ask that you consider candidates that offer different perspectives to ensure balance and impartiality on the panel. Groundswell NZ is mindful of the recent situation where the Rural Advocacy Network challenged some research conducted by Environment Canterbury which was found to be flawed. This scientific assessment of land reclamation of braided rivers had been reviewed multiple times by qualified experts who found no errors. It was not until an independent review was conducted at the behest of RAN that the errors were acknowledged. There was never a question of the reviewers being sufficiently qualified, this was a question of the reviewers being impartial.

Everyone involved in the Methane Science discussion is seeking clarity and a definitive outcome so energy can be directed towards solutions and promoting our climate credentials. It would be a major missed opportunity for both the government and farmers if the Methane review panel was seen to be favouring a particular outcome. In essence, it will have achieved nothing.

Groundswell NZ is willing to get behind which ever theory on Methane's warming effect proves most robust, most importantly to us is that the review is conducted with accuracy and impartiality.

Yours sincerely,

**Bryce McKenzie & Laurie Paterson**  
**GROUNDSWELL NZ**

**From:** [Groundswell NZ 2020](#)  
**To:** [Christopher Bishop \(MIN\)](#); [Todd McClay \(MIN\)](#); [Penny Simmonds \(MIN\)](#); [Andrew Hoggard \(MIN\)](#); [Mark Patterson \(MIN\)](#)  
**Subject:** COR728 - Letter from Groundswell NZ regarding the SNA Review and RMA reform process  
**Date:** Wednesday, 4 September 2024 5:10:03 PM  
**Attachments:** [20240904 Letter to Ministers re SNA review.pdf](#)

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Dear Ministers

Please see attached a letter from Bryce McKenzie and Laurie Paterson, Groundswell NZ co-founders, regarding the SNA Review and RMA reform process.

Kind regards

s9(2)(a)

**Groundswell NZ**

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4 September 2024

Hon Chris Bishop  
Minister for RMA Reform  
[C.Bishop@ministers.govt.nz](mailto:C.Bishop@ministers.govt.nz)

Hon Todd McClay  
Minister of Agriculture  
[T.McClay@ministers.govt.nz](mailto:T.McClay@ministers.govt.nz)

Hon Penny Simmonds  
Minister for the Environment  
[P.Simmonds@ministers.govt.nz](mailto:P.Simmonds@ministers.govt.nz)

Hon Andrew Hoggard  
Associate Minister for the Environment and Associate Minister of Agriculture  
[A.Hoggard@ministers.govt.nz](mailto:A.Hoggard@ministers.govt.nz)

Hon Mark Patterson  
Associate Minister of Agriculture  
[M.Patterson@ministers.govt.nz](mailto:M.Patterson@ministers.govt.nz)

Dear Ministers,

## **Our concerns regarding the SNA Review and RMA reform process**

Groundswell NZ is seeking clarification from the Government over the recently announced review of the Significant Natural Area (SNA) legislation.

SNAs were an important election issue for farmers and property owners throughout New Zealand. A key concern was how the SNA legislation trampled over private property rights, a concern echoed by National, ACT, and NZ First during the election campaign

The SNA legislation falls under the National Policy Statement Indigenous Biodiversity, identified by Groundswell NZ in the top four of unworkable regulations. Groundswell NZ continues to receive more complaints from across New Zealand over SNAs and other RMA Section 6 land classifications than on any other issue.

However, the recently announced review of SNAs appears to be focused on the SNA criteria and assessment process, rather than the policy itself. The presumption in the Government's media release is that the SNA policy will remain and, if that is the case, farmers, councils, and conservationists will be bitterly disappointed.

The problem with the SNA policy is not the criteria but how it (and other section 6 classifications such as Landscapes and cultural sites) tramples over property rights, penalises conservation minded landowners, pits councils against their ratepayers, and turns biodiversity on private land into a liability. It is not just a rural issue, but thousands of urban property owners are unfairly impacted too.

The SNA policy must be reviewed in its entirety – examining whether it is achieving anticipated environmental outcomes and in a cost-effective manner. Groundswell NZ is supportive of the new regulation ministry and the SNA policy would be a perfect candidate for a wide-ranging review. We are aware of biodiversity policy alternatives that are delivering positive environmental results with a fraction of the cost and without the grief that the SNA policy causes.

Groundswell NZ is further concerned that this SNA review is putting the cart before the horse, ahead of RMA reform. Our expectation from the Government after the election was that the RMA reform would be looking at key controversial issues, including SNAs and Section 6. We are seeking clarification from the Government if this is still the case and why the Government appears to be locking in SNAs, ahead of the RMA reform.

We are available to discuss these issues - in person or via Zoom.

Yours sincerely,

**Bryce McKenzie & Laurie Paterson**  
**Groundswell NZ**



**Groundswell NZ**

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**From:** [@x](#)  
**To:** [Hon Todd McClay](#); [Andrew Hoggard](#); [Mark Patterson](#)  
**Cc:** ["Bryce McKenzie"](#); ["Laurie Paterson"](#)  
**Subject:** COR1420 - Letter attached from Groundswell  
**Date:** Sunday, 27 April 2025 7:13:08 PM  
**Attachments:** [image001.png](#)  
[Minister Letter - 24.04.25.pdf](#)

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Good evening

Please see attached letter from Bryce and Laurie, with a couple of question on Farm Plans and SNA/RMA

Many thanks, Mel @ Groundswell



 @xxx

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27 April 2025

To Ministers A.Hoggard, T.McClay and M.Patterson

**RE: Farm Plans and SNA**

We are writing with concern from farmers around your recent releases on new freshwater farm plans and SNA/RMA reform policies.

Are you please able to answer the following questions, to give us clarity on direction:

- 1- Will it be a requirement for Farm Plans to be certified and audited by the farmer?
- 2- Will farm plans be nationally prescribed in legislation, and compulsory for all farmers?
- 3- Preference would be a simple tick box for farmers to identify risks on their farm and outline mitigations that will be taken, to keep on file and update annually.
- 4- Many farmers are not computer literate or App savvy, so we think a paper-form option is necessary.
- 5- Will the current RMA reform include a full review of the SNA Policy, rather than just reviewing how SNA's are identified? Property rights need to be protected first and foremost.

Thank you, we would appreciate a response as soon as you are able.

Kind regards

**GROUNDSWELL NZ**

**Bryce McKenzie and Laurie Paterson**

**hello@groundswell.org.nz**

# Hon Todd McClay

Minister of Agriculture  
Minister of Forestry  
Minister for Trade and Investment  
Associate Minister of Foreign Affairs



08 MAY 2025

Bryce McKenzie and Laurie Paterson  
Groundswell NZ  
By email: [groundswellnz2020@gmail.com](mailto:groundswellnz2020@gmail.com)

CORM-3803/TM03500

Dear Bryce and Laurie,

Thank you for your letter of 27 April 2025 regarding Freshwater Farm Plans and Significant Natural Areas (SNAs).

The Government is delivering a more practical and affordable freshwater farm plan system. We are reducing the number of farms required to have a plan; taking a risk-based approach to certification; and reducing the costs associated with certification and audit processes. Having a risk-based certification system will allow farm plans to act as an alternative to local council rules and consents, where appropriate.

The new farm plan system will recognise existing industry programmes and will support those farmers who are not in existing industry programmes with access to simple and practical plan templates, including paper-based options. This will ensure landowners have more choice and flexibility in how they meet their business and environmental requirements.

In October last year we removed the previous Government's directive to councils to identify new SNAs under the National Policy Statement for Indigenous Biodiversity through the Resource Management (Freshwater and Other Matters) Amendment Act. Since then, a review of the National Policy Statement for Indigenous Biodiversity has also occurred.

The review focused on the criteria for identifying SNAs, the process of assessing and identifying SNAs, and the restrictions that can be put on private land subject to SNAs. The outcomes of the review will inform the government's wider resource management reform programme, which aim to be sensible and respectful of private property rights.

Going forward, the Government has been clear that place-based environmental protection tools for indigenous biodiversity will require adequate consideration of how property rights will be upheld. Both new Acts will require justification reports if departing from approaches to regulation standardised at the national level.

Work on freshwater farm plans and SNAs is a government priority, and you can expect to hear more detailed announcements before the end of the year on these matters.

Warm regards,



Hon Todd McClay  
**Minister of Agriculture**



Hon Andrew Hoggard  
**Associate Minister for the Environment**



Hon Mark Patterson  
**Minister for Rural Communities**

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**From:** [Laurie Paterson](#)  
**To:** [Peter Foster](#); [Todd McClay \(MIN\)](#); [Simon Watts \(MIN\)](#)  
**Cc:** [Andrew Hoggard \(MIN\)](#); [Mark Cameron](#); [Penny Simmonds \(MIN\)](#); [Christopher Luxon \(MIN\)](#); [David Seymour \(MIN\)](#); [Winston Peters \(MIN\)](#); [Bryce McKenzie](#)  
**Subject:** Re: Nationals commitment to Paris  
**Date:** Monday, 10 February 2025 7:17:14 PM  
**Attachments:** [gisp-last-10000-new.png](#)  
[interGcyclesMod.jpg](#)  
[UAH\\_LT\\_1979\\_thru\\_January\\_2025\\_v6.1\\_20x9-scaled.jpg](#)  
[wijngaarden\\_ghg\\_warming.jpg](#)  
[GlacialDustStors.jpg](#)

Excellent Peter.  
Laurie

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**From:** Peter Foster **s9(2)(a)**  
**Sent:** Monday, February 10, 2025 6:01:49 PM  
**To:** x.xxxxxx@xxxxxxxxx.xxxx.xx <x.xxxxxx@xxxxxxxxx.xxxx.xx>; S.Watts@ministers.govt.nz <x.xxxxxx@xxxxxxxxx.xxxx.xx>  
**Cc:** x.xxxxxx@xxxxxxxxx.xxxx.xx <x.xxxxxx@xxxxxxxxx.xxxx.xx>; xxxx.xxxxxx@xxxxxxxxx.xxxx.xx <xxxx.xxxxxx@xxxxxxxxx.xxxx.xx>; x.xxxxxx@xxxxxxxxx.xxxx.xx <x.xxxxxx@xxxxxxxxx.xxxx.xx>; C.Luxon@ministers.govt.nz <x.xxxxxx@xxxxxxxxx.xxxx.xx>; x.xxxxxx@xxxxxxxxx.xxxx.xx <d.seymour@ministers.govt.nz>; x.xxxxxx@xxxxxxxxx.xxxx.xx <x.xxxxxx@xxxxxxxxx.xxxx.xx>; Laurie Paterson **s9(2)(a)**; Bryce McKenzie **s9(2)(a)**  
**Subject:** Nationals commitment to Paris

Dear Ministers,

I am in receipt of your letter to National Party rural supporters on the Government commitments to the Paris Agreement.

Your newsletter totally avoids the issue of how you are going to meet your Paris commitments.

From previous comments there appears to be a fanciful belief that some significant reduction can be made to livestock methane by the use of a technology such as boluses, vaccines, genetics etc. The public reaction overseas to bovaer coupled with the cost and effort to farmers should tell you that that is not a solution. You will no doubt be hearing from many scientists telling you they are on the brink of a solution, just a few more millions in research needed. Unfortunately they have been doing that for decades and but their claims never eventuate- only the demand for more funding.

In reality, the only way to reduce stock methane is to reduce stock.

Like every other country, NZ will not meet its commitments so your latest change will mean that NZ has to pay for the shortfall. In the process it will destroy our agricultural industry and increase poverty in NZ.

.You have been sent the Groundswell response to the Methane Review Panel report. You need to read the Groundswell response but it is fairly technical, so please concentrate your mind on the figures I am about to give you.

My first number is based on a number stated by the **Ministry for the Environment**; that the cumulative warming caused by NZ's anthropogenic methane in the 172 years from 1850 until 2022 is 0.0021°C, this equates to 0.000012 °C/year. BUT because NZ livestock has reduced significantly, the number going forward, as calculated by Professor David Frame, is of the order of 0.00001 °C/year.

**1st** **0.00001 °C/year** or  
**10 millionths of a degree/year**

Now atmospheric temperature measurements have an average margin of error of ± 0.35. So my second number

is the number of years it would take for warming from NZ's methane to equal the margin of error (i.e. to reach a value that might be measurable). That number is  $0.35/0.00001 = 35000$

## 2nd

## 35,000 years

So it will take 35,000 years before NZ's warming could even be noticed, but that is not the end of it, that warming would be lost in the noise of the variability of global temperatures.

In the 13 months from January 2023 world temperature increased by **1 °C**. From February 2024 until this January, it decreased by just on **0.5 degrees** (see UAH global temperature below) What temperature change is caused by nature and what is caused by man is very difficult to determine (that 1 °C increase was not expected, was not explained by the climate models and while there are some suggestions, such as the water vapour put into the air by the Hunga Tonga Ha'apai , the cause of that increase is unknown).

In 1995 the scientists preparing the summary for policy makers wrote that they would need to have more data on natural variation before they could determine whether any increase was caused by CO2. So, what is natural and what is caused by humans is difficult to determine.

In 35,000 years Earth will be well into the next glacial period, many degrees cooler than now, glaciers will be advancing across the northern hemisphere, permanent ice will cover most of northern Europe, Asia and America. The cold oceans will have absorbed CO2 to the point where atmospheric CO2 is less than 190 ppm, plants die, most land is desert and dust storms ravage the planet. (plants die from lack of CO2 when it goes below ~200 ppm)

**This is written in the ice record**, it will happen again as it has happened, repeatedly, in the past, see evidence below.

### Global Methane

Now let us consider global methane. Methane's ability to absorb energy is **30** times that of CO2 at present concentrations, but CO2 is increasing **300** times faster than methane. So from adding one methane we get 30 warming units = 30 and for every methane CO2 increases 300 fold, so 300 CO2 @ 1 warming unit each = 300. Warming from methane then is only 10% of the warming from CO2. Not the 28 times worse that you use.

The warming caused by the increase in CO2 (at the present rate of increase) is 0.85 °C/century. methane is a tenth of that at 0.085 °C/century, that is 0.00085 °C /year or 0.86 thousandths of a degree/year.

The additional warming caused by the increase in methane, based on its present rate of increase.

## 3rd

## 0.00085 °C /year

(0.85 Thousandths of a degree/year)

Which means it would take 412 years to reach the error margin of temperature measurements, let alone have any significant effect on global temperatures

## 4th

## 412 years

In 400 years time the next cyclic cold period will be well underway and that will be colder than the last Little Ice Age.

**Ministers, the first two numbers are based on MfE values, they are your figures.**

The numbers 3 & 4 are based on very sound research that has become available in the last few years but ignored by the Methane Review Panel.

The choice for you, Minister, is to pour billions of dollars into a failed venture and destroy the NZ economy, or to pull out of the Paris Agreement.

To continue to waste taxpayers money on a temperature increase that is so minuscule as to be unmeasurable for

35000 years, is the epitome of madness.

Lets not pull punches Minister, do you want to be remembered as a politician of merit, or a dumb naive gullible idiot.

To stay in Paris is virtue signalling for no benefit to anybody, will the world follow our lead ?

Reflect on this;

- USA, Indonesia have pulled out of Paris, Argentina is set to follow
- BRICS group are not taking part except for China who has no intention of reducing its use of fossil fuels - it is there merely to help push the western world to its own destruction
- EU & UK are in industrial decline with an energy crisis on hand. They will move politically to the right in the near future and pull out of Paris or renege on commitments.
- Canada is in political turmoil and if a center right group takes over it will pull out of Paris.

Mitigation is at a dead end. Adaptation is the new buzz word. Why throw good money after bad. The NZ green fringe will just have to bite the bullet of reality so stop appeasing them.

## Pull out of Paris now

Yours sincerely

Peter Foster

### Supporting data.

#### Warming from Greenhouse gases

wijngaarden ghg warming.jpg



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### Global Temperature

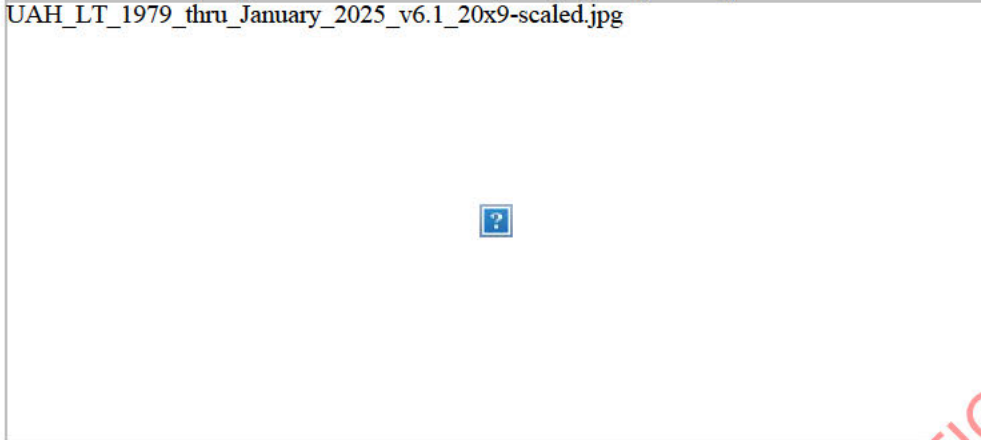
The USH global temperature record from 1979 to Jan 2025.

Note the huge variation from year to year.

The upward trend is now 0.14 °C/decade.

The cause of the upsurge in 2023 is not known, it was not expected by the models.

UAH\_LT\_1979\_thru\_January\_2025\_v6.1\_20x9-scaled.jpg



### Ice records (Greenland) last 10,000 years.

Note

1. the decline in the last 5000 years

2. The 1000 year warming cooling cycle

Minoan warm period 3200 years ago

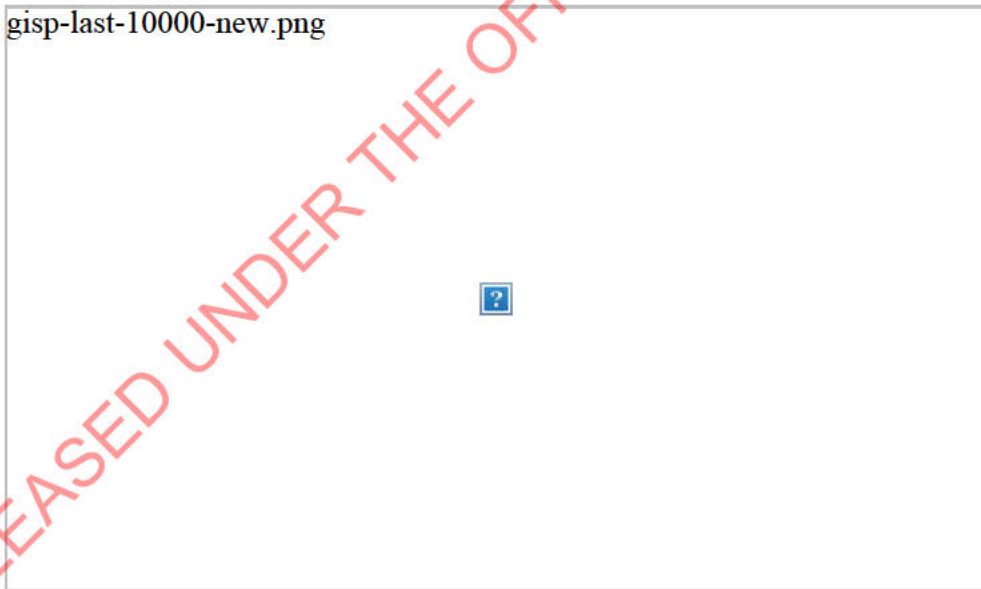
roman Warm period 2000 years ago

Medieval warm period 1000 years ago

Present warm period now

**In 400 years it will be very cold**

gisp-last-10000-new.png



### The last half million years

I have extrapolated the cyclic pattern of interglacial warmth to show the world in 35,000 years time

interGcyclesMod.jpg



In the coldest parts of the interglacial period, CO<sub>2</sub> drops below 190ppm due to cold water absorbing more from the atmosphere.

That causes huge deserts as most plants have died and allows dust storms to ravage the Earth.

In the chart below the yellow bands are when dust storms are high, note that they start when CO<sub>2</sub> drops below 220 ppm and become more severe as CO<sub>2</sub> drops below 190ppm.

Plants need CO<sub>2</sub> to live, it is the gas of life.

GlacialDustStors.jpg



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Peter Foster  
s9(2)(a)



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**From:** [Laurie Paterson](#)  
**To:** s9(2)(a) [Helen Mandeno](#)  
**Cc:** [Grant McCallum](#); [Andrew Hoggard \(MIN\)](#); [Bryce McKenzie](#); s9(2)(a)  
[Mark Cameron](#)  
**Subject:** Re: NZ Farming, Groundswell and Methane Science Accord Ruminant Methane Survey  
**Date:** Tuesday, 13 May 2025 9:23:17 PM

---

I would publish it as an open letter. Very well written Helen.  
Laurie

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**From:** s9(2)(a)  
**Sent:** Tuesday, May 13, 2025 7:32:26 PM  
**To:** s9(2)(a)  
**Cc:** x@x<x@x; Andrew Hoggard <x@x; Bryce McKenzie s9(2)(a) Laurie Paterson s9(2)(a) s9(2)(a) s9(2)(a) Mark CAMERON MP <x@x  
**Subject:** Re: NZ Farming, Groundswell and Methane Science Accord Ruminant Methane Survey

Should we publish that as an open letter Helen??

On 13 May 2025, at 6:27 pm, Helen Mandeno s9(2)(a) wrote:

Dear Grant,

I was very disappointed to hear your response on the Country Show to the results of the combined NZ Farming, Groundswell and Methane Science Accord ruminant methane survey.

You insinuated that the study was not scientific, and you dismissed the results as not being representative of the general farming population. The combined reach of the survey was to more than 400,000 farmers and rural supporters and your comment is therefore highly inaccurate and quite frankly, insulting. Are you implying that 400,000 supporters is not representative of the general farming populace?

The results of the survey should have served as a wakeup call to your government that there is a severe disconnect between industry representatives and grassroots farmers, but your instant dismissal was characteristic of the marginalisation and arrogance that has been shown to farmers regarding the ruminant methane issue. You even said that the survey results reflected the echo-chamber that was to be expected from Groundswell and Methane Science Accord supporters. You conveniently seemed to forget about the huge and

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broad base of following that NZ Farming has.

I also heard you mention that you had attended the Dairy Industry Awards and that those present had a different viewpoint and were supportive of methane reduction measures. It is obvious that you have failed to recognise that you only inhabit echo chambers yourself.

Farmers have been gaslit right from the start. No one has previously asked grassroots farmers for our opinion. The only opportunities to express our concerns have been small-sized random surveys that contained loaded questions or woolshed meetings where industry representatives talked over us and didn't listen. This is the first chance that ALL farmers have been asked their opinion.

Grassroots farmers are the backbone of our country, providing not only vital income and jobs for the economy but also providing necessary support for our rural communities.

Seeing as you are so confident in your opinion that our survey was unscientific and not representative of grassroots farmers, I am cordially inviting you to a meeting with a hall full of NZ farmers where you can chat to them to gauge for yourself.

To refuse this invitation will show that you are not confident in your opinion whatsoever.

Therefore, please let me know a date and time that suits and we will invite NZ farmers along to have a conversation with you about ruminant methane reduction requirements.

Kind regards,

Helen Mandeno  
Methane Science Accord.

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**From:** [Groundswell NZ 2020](#)  
**To:** [Simon Watts \(MIN\)](#); [Todd McClay \(MIN\)](#); [Penny Simmonds \(MIN\)](#)  
**Cc:** [Nicola Grigg \(MIN\)](#); [Andrew Hoggard \(MIN\)](#); [Mark Patterson \(MIN\)](#)  
**Subject:** COR2021 - Letter from Groundswell NZ regarding the proposed NZ Taxonomy from the Centre for Sustainable Finance  
**Date:** Thursday, 23 October 2025 11:20:37 AM  
**Attachments:** [20251023 Letter to ministers re CSF Taxonomy.pdf](#)

---

Dear Ministers

Please see attached a letter from Groundswell NZ co-founders Bryce McKenzie and Laurie Paterson regarding the proposed NZ Taxonomy from the Centre for Sustainable Finance.

Kind regards  
s9(2)(a)

Groundswell NZ

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23 October 2025

Hon Simon Watts  
Minister of Climate Change  
[S.Watts@ministers.govt.nz](mailto:S.Watts@ministers.govt.nz)

Hon Todd McClay  
Minister of Agriculture  
[T.McClay@ministers.govt.nz](mailto:T.McClay@ministers.govt.nz)

Hon Penny Simmonds  
Minister for the Environment  
[P.Simmonds@ministers.govt.nz](mailto:P.Simmonds@ministers.govt.nz)

Dear Ministers,

## **The Centre for Sustainable Finance's NZ Taxonomy must be scrapped**

We write concerning the latest consultation document from the Centre for Sustainable Finance on their NZ Taxonomy development and reiterate our call for the entire project to be scrapped immediately.

While we cover specifics below, the most important elements for the Government to understand are:

- The entire project is an ideological exercise divorced from scientific, economic, and political reality. Consider alone their continued insistence on the 1 tonne of CO<sub>2</sub>e per hectare limit for a farm be considered "green", despite our farms – the most efficient in the world – operating at between three to nine times that figure.
- The policy goals, direction, and process run directly contrary to the Government's stated approach to climate and agricultural policy, continuing with the worst of the Ardern era's backward, unscientific approach to agricultural emissions and promoting unworkable regulations to chase the resulting unachievable targets.
- The outsourcing of policy development to a private trust, while receiving ministerial backing and Government funding, has gone beyond the unclear status of the project to make a farce of the entire consultation process.

Over \$3 million in Government funding has been handed over to the Centre for Sustainable Finance so far. What the New Zealand public has received in exchange is a collection of Paris Agreement waffle from the global consultant class, a botched consultation process that failed to involve the Agriculture Sector, and a set of unworkable regulations in pursuit of unachievable, unscientific targets.

We urge the Government to get out now, while this project is merely a colossal waste of money and not yet a Government-backed assault on farmer access to credit and banking services.

This scheme is claimed to be both a voluntary scheme and intended to become compulsory in time. It is an NGO working independently, as well as backed with funding and “legitimacy” by the Government.

No voluntary scheme to qualify for something extra or a cheaper rate lasts long before it becomes the new baseline and an excuse to turn down the screws on the general public. If the NZ Taxonomy were to become policies in action, however that might actually work, banks would have another excuse to charge the vast majority of farms in New Zealand still higher rates – or even decline to lend at all.

The Centre for Sustainable Finance also says its Taxonomy proposal is necessary to attract global capital interested in these sorts of low-emissions categories but, as similar schemes in the UK and Australia unravel and the Net Zero Banking Alliance falters, it is clear global capital has other priorities.

Any capital honestly looking for low-emissions food production to invest in should already be coming New Zealand’s way. If there was any intellectual honesty in the NZ Taxonomy project, it would be seeking to advantage current Kiwi production methods and emissions levels against the higher-emitting farming in the rest of the world. That it does not demonstrates that the Centre for Sustainable Finance either actively seeks to erode food production in New Zealand or that it has a callous disregard for the consequences of the proposals they push to appear fashionable to their counterparts overseas.

Across the entire collection of documents on the NZ Taxonomy, there is nothing addressing emissions leakage or the use of up-to-date emissions metrics. If ministers are somehow unsure whether to end this project now, we encourage them to meet with the CSF and put these basic elements of emissions policy to them. This is an ideological exercise, not serious policy development. Further, not merely uninformed on emissions, the NZ Taxonomy veers into taking stances on the Treaty of Waitangi and duplicating farm plans. Is all this value for money? Is the taxpayer getting their \$3 million worth yet?

The Government’s funding decisions have established and expanded a group dedicated to keeping the Ardern-Shaw approach to agricultural emissions alive. This is will either be a fundamental betrayal of the voters that put this Government in office or, if action is taken now, merely a waste of millions of dollars when Kiwis can least afford it.

Our questions to you:

- Why has the Government funded this private trust with millions of taxpayer dollars to contradict the Government?
- Does the Government intend to continue funding this plan for economic arson or will New Zealand’s taxpayers only have to bear the money lost so far?
- Is the Government sincere in its stated climate and agricultural regulation policies or should we expect the NZ Taxonomy to progress?
- Will the Government at least commit now to providing not one dollar more to this scheme?



Groundswell NZ, along with our tens of thousands of supporters, opposes the Paris Agreement framework and New Zealand's current approach to it. Our surveys show more and more farmers are also coming to oppose the Paris Agreement as they understand how successive governments have sold them out.

This NZ Taxonomy proposal, however, is both opposed to the Coalition Government's policies and funded by it. In asking you to scrap it, we are merely requesting that you act to follow your own stated policy. Anything less would confirm the complete capture of the Government by the climate consultant class.

We are available to discuss these issues - in person or via Zoom.

Yours sincerely,

**Bryce McKenzie & Laurie Paterson**  
**Groundswell NZ**

CC:

Hon Nicola Grigg  
Associate Minister of Agriculture  
[N.Grigg@ministers.govt.nz](mailto:N.Grigg@ministers.govt.nz)

Hon Andrew Hoggard  
Associate Minister of Agriculture  
[A.Hoggard@ministers.govt.nz](mailto:A.Hoggard@ministers.govt.nz)

Hon Mark Patterson  
Associate Minister of Agriculture  
[M.Patterson@ministers.govt.nz](mailto:M.Patterson@ministers.govt.nz)



**Groundswell NZ**

**From:** [@x](#)  
**To:** [Hon Andrew Hoggard](#)  
**Subject:** INV1093 - Meeting Request  
**Date:** Monday, 10 November 2025 9:44:56 AM  
**Attachments:** [image001.png](#)

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Good Morning

I am writing to please see if there is an opportunity for Bryce McKenzie and Laurie Paterson, co-founders of Groundswell NZ, to meet with Minister Hoggard when they will be in Wellington on Wednesday 3<sup>rd</sup> December 2025.

They are meeting other ministers in the afternoon, so anytime mid-late morning would be good.

Please advise at your earliest convenience.

Kind regards, s9(2)(a) – Groundswell NZ

s9(2)(a)



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**From:** [Jamie McFadden](#)  
**To:** Out of scope  
**Cc:** [Bryce McKenzie](#); [Laurie Paterson](#); s9(2)(a); [DairyNZ](#); s9(2)(a); [DeerNZ](#); [Farmers Weekly](#); [Rural News](#); s9(2)(a); [Andrew Hoggard \(MIN\)](#); Out of scope; [online@thecountry.co.nz](#)  
**Subject:** To National MP's  
**Date:** Sunday, 16 March 2025 8:47:21 PM  
**Attachments:** [Policies the coalition government are not addressing.pdf](#)

Out of scope

The coalition government has made some positive policy changes which is appreciated but the final landing on key issues remains unclear. I have put together the attached list of key issues that the government either have not addressed or appear to be pulling back on. This is now causing considerable concern across NZ.

Out of scope

regards

Jamie McFadden - environmental consultant and practitioner, farmer and rural advocate.

s9(2)(a)

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There are several key policies that farmers are concerned the coalition government is failing to address:

1. It defies logic to **Methane tax** the world's most emissions efficient food producers. This, and the ill-conceived climate change policies, are driving more farmers off the land and into pines. The methane tax is widely opposed by farmers and if implemented will mean the environment will be worse off with farmers having less money to spend on environmental projects.
2. Exit the **Paris Accord and repeal the unachievable methane targets**. A recent Farmers Weekly readers' poll showed 70 % in favour of exiting the Paris Accord. Develop an exit strategy that tells the story of how NZ farmers are, and will, continue to lead the world in environmentally sustainable food and fibre production, but that being bound to the Paris Accord undermines that.
3. Stop wasting taxpayers money on **methane technologies** such as boluses and vaccines. Most farmers have switched off emissions thanks to the HWEN debacle and the appetite among farmers for adopting methane mitigation strategies is evaporating. Hence, commercialized methane products will have limited uptake – pull the pin on AgriZeroNZ.
4. Overhaul of **Freshwater legislation**. This is underway but farmers are concerned the changes will not go nowhere far enough to fix the complexity and unworkability of both the national and regional legislation. Consenting processes are a dog's breakfast and costs spiralling out of control. Wide-ranging reform is urgently required to simplify the system. Strong support from the primary sector for Shane Jones's call for longer consent durations.
5. Repeal the **Freshwater Farm Plan legislation**. This is impractical, ill-conceived Labour Party designed legislation in a silo, and farmers don't understand why the coalition government are persisting with it. Beef+LambNZ survey found 83% of farmers oppose freshwater farm plans being mandatory, something the government should heed. Farm plans need to be industry led, holistic and integrated. There are lots of different industry, council and individual farm plan models already in place, do not undermine this with top-down government legislation.
6. Drop the **SNA policy**. Widespread disappointment the government are continuing with this policy, tweaking it rather than getting rid of it altogether. Broken election promise. A curse of a policy that penalizes conservation minded landowners, pits councils against their communities, wastes \$millions and doesn't help biodiversity.
7. Same with SNA's, is all other **RMA section 6 land grab classifications** including the new SASMs (Sites and Areas of Significance to Maori). These should all be halted pending the RMA review.
8. Dump the **National Policy Statement Indigenous Biodiversity**. This legislation has multiple unworkable elements which trample property rights, places more unnecessary costs on landowners and ratepayers, and achieves nothing positive for biodiversity. Needs pausing and reconsidered as part of the RMA reform.

9. New legislation is urgently needed to stop governments and councils riding roughshod over **property rights**. As promised during the election campaign.
10. As part of new legislation support the addressing of environmental issues – freshwater, indigenous biodiversity etc, through empowering industry/community led solutions like **Catchment and Landcare Groups, integrated industry farm plans (already in place to a large extent), expanded QEII Trust covenant** system and biodiversity trusts. Taking a holistic approach will deliver multiple environmental benefits, including for the climate.
11. Aligned with 10. above is support a simple framework that helps farmers with environmental issues in a holistic, integrated manner. This ideally should be industry led and across the whole country. Ditch all the unnecessary and duplicating bureaucracy. The emissions space is an example of unnecessary bureaucracy with AgriZeroNZ, PGGRC and NZARGC draining off farmers and the taxpayer's purse.
12. **The RMA reform** is piecemeal and arse about face. All policies, including SNA's, farm plans, National Policy Statements etc need to be reviewed before implementing RMA reform. The coalition government is squandering the once in 34-year opportunity to do a proper review and reform of the RMA.
13. **The Gene Technology Bill** is dividing farmer opinion and there remains significant unease across the rural sector about the implications and consequences of this legislation and haste with which it is being pushed through.

Jamie McFadden

Environmental consultant and practitioner, farmer and rural advocate.

s9(2)(a)

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**From:** [Jamie McFadden](#)  
**To:** [Andrew Hoggard \(MIN\)](#); Out of [redacted]  
**Cc:** [Bryce McKenzie](#); [Laurie Paterson](#); [Groundswell](#) s9(2)(a)  
**Subject:** Re: RMA issues  
**Date:** Sunday, 30 March 2025 8:28:53 PM

---

Good to catch up briefly at Field days Andrew but I didn't get back to finish the discussion.

The key question with SNAs is as I outlined below - has, or is any work been done on the effectiveness of the SNA policy? Our local council (Hurunui) assessed it as an ineffective policy and don't want a bar of it. (other councils feel same).

It is unclear exactly what ACT's position of SNAs is i.e the policy is ineffective, not fit for purpose, and must go or the policy remains but needs changing.

Same question for Freshwater Farm Plans.

cheers

Jamie

On 23/03/2025 5:49 pm, Andrew Hoggard (MIN) wrote:

Hi Jamie,

As you well know I'm in charge of SNAs and Farm Plans, if you would like a discussion on both, I will be at the Kirwee Feildays on Thursday, drop by then.

Cheers

Andrew

---

**From:** Jamie McFadden s9(2)(a)  
**Sent:** Sunday, 23 March 2025 5:32 PM  
**To:** Andrew Hoggard (MIN) <[A.Hoggard@ministers.govt.nz](mailto:A.Hoggard@ministers.govt.nz)>; Out of scope  
Out of scope  
**Cc:** Bryce McKenzie s9(2)(a) Laurie Paterson  
s9(2)(a) Groundswell NZ  
<[groundswellnz2020@gmail.com](mailto:groundswellnz2020@gmail.com)>; s9(2)(a) s9(2)(a)  
**Subject:** RMA issues

Hi Andrew Out of [redacted]

Out of scope [redacted]

[redacted] This includes the RMA and they were unsure as to what was happening with likes of Freshwater Farm Plans and SNA's and why those policies were still being progressed rather than properly reviewed or binned altogether.

It is unclear in relation to these 2 policies as to whether they are remaining in place because Luxon has said so or because ACT has determined for them to

stay. Reading back on Andrew's Press Release it states that the review of SNAs will consider how SNAs are identified, criteria etc rather than a review on the effectiveness of the SNA policy per se.

Same with the Freshwater Farm Plan press release only talks about improving the current freshwater farm plan legislation rather than whether it is appropriate or effective in the first place. Both laws are dogs and the Beef+Lamb survey showed a huge majority (83%) of farmers were against the mandatory freshwater farm plans.

Farmers would like to know who in government is pushing for these policies to remain and it defies logic that both policies are not being properly reviewed for their suitability and effectiveness as part of the RMA reform. The Press Releases indicate it is a foregone conclusion these policies will remain even before the RMA review has been done and consulted on?

cheers

Jamie

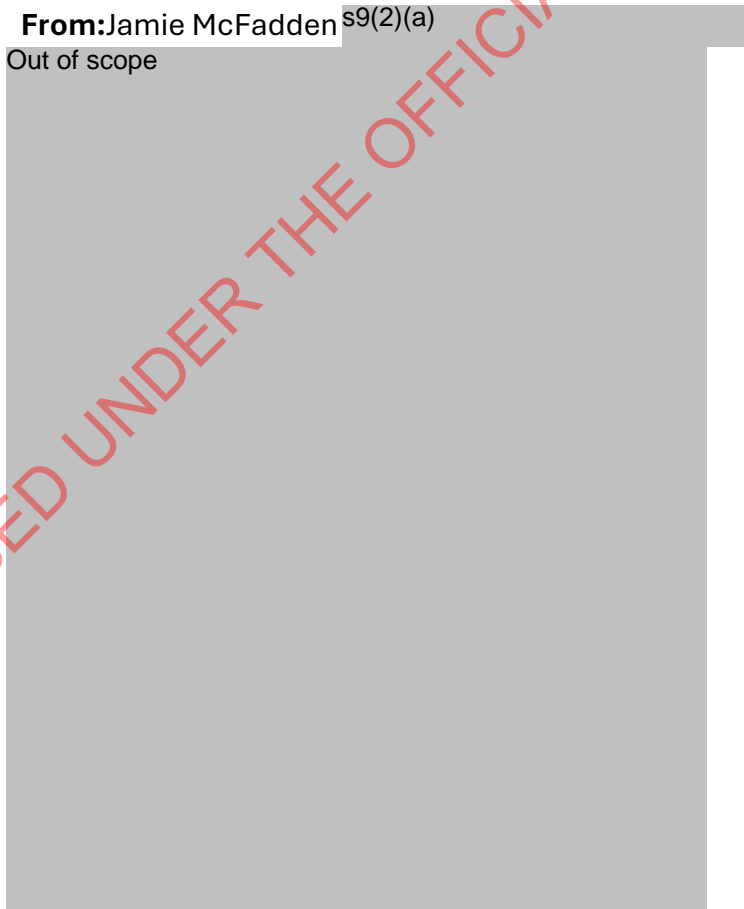
----- Forwarded Message -----

**Subject:**To National MP's

**Date:**Sun, 16 Mar 2025 20:46:56 +1300

**From:**Jamie McFadden s9(2)(a)

Out of scope



**CC:**Bryce McKenzie s9(2)(a)

Laurie Paterson

s9(2)(a)

Winton Dalley

s9(2)(a) s9(2)(a)

s9(2)(a)

s9(2)(a)

s9(2)(a)

s9(2)(a)

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s9(2)(a)

s9(2)(a)

s9(2)(a)

s9(2)(a), DairyNZ

[xxxx@xxxxxxx.xx.xx](mailto:xxxx@xxxxxxx.xx.xx), s9(2)(a)

s9(2)(a)

s9(2)(a)

s9(2)(a)

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s9(2)(a)

s9(2)(a) DeerNZ [xxxx@xxxxxxx.xxx](mailto:xxxx@xxxxxxx.xxx),

Farmers Weekly [xxxxxxx.xxxxxx@xxxxxxx.xx.xx](mailto:xxxxxxx.xxxxxx@xxxxxxx.xx.xx), Rural News

[xxxxxxx@xxxxxxxxx.xx.xx](mailto:xxxxxxx@xxxxxxxxx.xx.xx), s9(2)(a)

s9(2)(a)

[A.Hoggard@ministers.govt.nz](mailto:A.Hoggard@ministers.govt.nz),

Out of scope

Out of scope

[xxxxxx@xxxxxxxxxxx.xx.xx](mailto:xxxxxx@xxxxxxxxxxx.xx.xx)

Out of scope

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Out of scope

regards

Jamie McFadden - environmental consultant and practitioner, farmer and rural advocate.

s9(2)(a)

**From:** [Jamie McFadden](#)  
**To:** [Andrew Hoggard \(MIN\)](#)  
**Cc:** Out of [redacted]; [Bryce McKenzie](#); [Laurie Paterson](#); [Groundswell NZ](#); s9(2)(a) s9(2)(a)  
**Subject:** Freshwater Farm plans  
**Date:** Sunday, 17 August 2025 7:14:55 PM

---

Hi Andrew.

Copied below for reference is my reply to your Facebook comment about farm plans. It is not the detail of the Freshwater Farm Plan legislation that is the predominant issue, it is the policy framework that wraps around them. A government prescribed mandatory stick, rather than industry and farmer led as was already happening.

The FWFP legislation is top down rather than ground up. It increases regulation/bureaucracy/admin for many farmers (particularly hill & high country, low environmental impact). It increases government interference into farming (going against the election promise to get government out of farming). It adds more unnecessary and unproductive cost onto farmers, particularly those mentioned above. It increases bureaucracy - MfE employing more staff, councils employing more staff, more tick box consultants. All of them draining more and more off farmers!

Everything about this goes against the principles I thought ACT stood for s9(2)(a) [redacted] It appears ACT have fallen for the we must do this for our licence to operate spin and it seems extraordinary that ACT would agree to a mandatory system of this nature.

I have had extensive experience in farm plans and recently started down a different track with irrigating and dairy farmers because the audited farm plan system in Canterbury wasn't empowering many farmers and not delivering the necessary environmental outcomes. The alternative approach is focused on simple environmental risk and opportunity farm assessment using science/knowledge from each farm e.g. water quality testing and catchment context, biodiversity, pest issues etc to draw out the top 2 or 3 environmental priorities/solutions. This is being rolled out in conjunction with 13 new catchment groups.

You seem to be of the view the farm plan is the be all and end all whereas experience shows it is just one of many tools that farmers can use to address environmental issues like freshwater.

With my knowledge of farm plans I can see this legislation you are drafting is going to be really bad for farmers (particularly when Labour/Greens get back in). It will also become an administrative nightmare, particularly once biodiversity and emissions are added in. Along with Paris it will become one of the biggest legislative threats and frustrations to NZ farmers, again particularly for hill and high country farming families.

Last time we spoke with you in Wellington about this you did not appear prepared to listen and stated along the lines that we were going to have to lump it. I suggest continuing in that frame of mind and with this legislated approach will not end well for ACT or for farmers.

cheers

Jamie

Jamie McFadden

Andrew Hoggard MP given there has been a massive uptake by farmers of environmental farm plans and catchment groups why did the government not back the industry to continue to roll it out, rather than having it as top down state prescribed legislation? Industry groups - beef&lamb, dairy, deer, arable etc were all doing heaps of work in the farm plan space, recognising no one size fits all works across sectors and individual farms. It is not a question of 2 paths but a question of the how the farm plan/catchment groups path works in addressing environmental issues. Essentially the choice is an industry & community led approach supported by Government or a top down legislated model that operates as a certified/audited mandate. It is bloody disappointing the govt has chosen the latter and it will hugely undermine the huge potential of farm plans and all the good work farmers have been doing. Beef&Lamb survey showed 83% of sheep & beef farms opposed the mandatory approach you are promoting. Farmers are crying out for less paperwork & less bureaucracy. This proposal creates more of both for many hill and high country farmers, particularly those that don't have winter grazing - ironically some of the lowest environmental impact farms. I am involved in projects that involve a simple environmental risk assessment and the key actions required. It doesn't need lots of paperwork or certifying or auditing but a trusted, knowledgeable advisor that helps the farmer understand the key issues and key actions required (and in my case can implement them). This is similar to the hugely successful Catchment Board farm plan system. The role of farm advisors should be to make things as simple as possible, least cost and deliver farmers real value for the service provided. Another reason the Freshwater Farm plan legislation is flawed is because it is silo focused on freshwater whereas farmers are calling for integrated farm plans. For many farms, especially hill and high country, they have more pressing issues than freshwater - e.g. weeds and pests. An integrated plan recognizes this. Farmers have been given the sales pitch, have farm plan, no need for consents. But the only example the government continue to provide is winter grazing. What about consents for stock exclusion, gravel extraction, works in waterways, outstanding landscapes rules, SNAs, offal pits, discharges to land or water - there are hundreds of rules, many that farmers are unaware of. Farm plans are only one tool in the toolbox and not every farmer finds them useful. It is the environmental risk assessment (across all environmental issues) all farmers should be doing but again this should be industry led. Put some faith in our sector for a change and gives us the chance to develop our own solution from the grassroots as is already happening.

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**From:** Jamie McFadden s9(2)(a)

**Date:** Saturday, 22 November 2025 at 2:35 PM

**To:** Hon David Seymour <David.Seymour@parliament.govt.nz>, Andrew Hoggard (MIN) <A.Hoggard@ministers.govt.nz>, Out of

Out of scope >

**Cc:** Bryce McKenzie s9(2)(a) Laurie Paterson s9(2)(a) Groundswell NZ

<groundswellnz2020@gmail.com>, s9(2) s9(2)(a)

**Subject:** Regulatory Standards Bill and Freshwater Farm Plan legislation

Hi David, Andrew and Out.

Congratulations on progressing the Regulatory Standards Bill. This sort of legislation is badly needed to get rid of the unnecessary and ineffective, costly regulations. And to stop the unfettered powers of central and local government.

However, what is impossible to reconcile with ACT's long standing principles behind this Regulatory Standards Bill, is the push by this government (including ACT) to force the Freshwater Farm Plan legislation through. I see this incredibly ill-conceived legislation as the biggest legislative threat to sheep and beef, hill and high country farmers. This Freshwater Farm Plan legislation would easily fail to meet the very aspirations you seek with the Regulatory Standards Bill. It appears the main reason argued for the FWFP legislation is to appease the public, again something that hasn't worried ACT in the past.

Chair of Beef+Lamb, Kate Acland wrote an excellent opinion piece highlighting the flawed approach of this legislation

[https://urldefense.com/v3/https://www.farmersweekly.co.nz/opinion/farm-plans-top-consents-for-freshwater-management/!!Asq5-8xVch3RegtuBwDoamFe4v83b9n/ANWQkGTGt2X\\_nd05GTeySAw1eM14RzC99Y4gXzb6Z6VaQDV543mVtHKgKaoXkmQGLVGWVerTxRhLjqVCtWQqvo\\$](https://urldefense.com/v3/https://www.farmersweekly.co.nz/opinion/farm-plans-top-consents-for-freshwater-management/!!Asq5-8xVch3RegtuBwDoamFe4v83b9n/ANWQkGTGt2X_nd05GTeySAw1eM14RzC99Y4gXzb6Z6VaQDV543mVtHKgKaoXkmQGLVGWVerTxRhLjqVCtWQqvo$)

I have drafted the following that also graphically shows why this legislation is so bad and will reflect very poorly on ACT to its long standing rural support base.

regards

Jamie McFadden

s9(2)

← Bryce Mckenzie



Friday, 24 Nov • 12:15 pm

Congratulations on your appointments Andrew. Really encouraged by the announcement this morning, rural NZ has been heard.

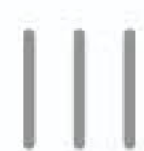
Thanks Bryce, alot to do.

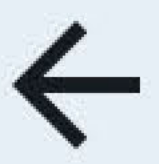


Thursday, 14 Mar • 6:06 pm

Great announcement today on SNAs Andrew, well done.

Please insert a SIM card to continue





Bryce Mckenzie



Thanks Bryce, alot to do.



Thursday, 14 Mar • 6:06 pm

Great announcement today on SNAs Andrew, well done.

Now just have to get rid of the Sites & areas and SASMs.

Thanks Bryce, will see what we can do.



7:04 pm • SMS

Please insert a SIM card to continue





B

Bryce Mcken...



Hi Andrew we are in Copper fields having a Coffee

Friday, 10 May • 4:22 pm

Hi Andrew

Thanks for yesterday, was pleased you made it clear to s9(2)(a) about farm plans. I have been telling him for a while we are not going to stand against having farm plans.

He has been like a dog with a bone, hopefully he will let it go now & put his energy's to something worth while.

Friday, 12 Jul • 3:13 pm

Hi Andrew

Not sure if you know but we are getting reports out of North Canterbury that they are still having major problems with drought & stress.

All the best.

Bryce

3:13 pm



Text message



# Out of scope



Bryce Mckenzie



Thursday, 13 Mar • 1:00 pm

Great article in the rural news Andrew. Top work.

Sunday, 6 Apr • 7:44 pm

Let me know when you're free for a chat please Andrew.  
Bryce

Monday, 7 Apr • 5:50 am

Free now, driving to wellington. Should get there around 7.30. Feel free to call, otherwise I



Text messa...



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# Out of scope



Bryce Mckenzie



news Andrew. Top work.

Sunday, 6 Apr • 7:44 pm

Let me know when you're free for a chat please

Andrew.

Bryce

Monday, 7 Apr • 5:50 am

Free now, driving to wellington. Should get there around 7.30. Feel free to call, otherwise I will try calling you during my gaps in the day.

5:50 am SMS



Text messa...



← Bryce Mckenzie



Wow Andrew, great announcement today re RMA, you guys are really are up for the job. Keep up the great work. If you need Groundswell NZ to do anything to help just let me know. Thanks for what you're doing.

Bryce

Thanks Bryce, key thing will be farmers stepping upto the plate showing that these over the top rules weren't needed in first place. Your mate with the drone will be going hard out to find bad footage, so we need farmers to ensure none can be provided.

Yep I agree with you, unfortunately it will most likely happen, we need farmers to be more proactive if they see neighbours not doing the right thing.



Text message



← Bryce Mckenzie



farmers to be more proactive if they see neighbours not doing the right thing.

Yep

Thursday, 9 May • 3:28 pm

Hi Andrew we are in Copper fields having a Coffee

Friday, 10 May • 4:22 pm

Hi Andrew

Thanks for yesterday, was pleased you made it clear to section 9 (2) (a) about farm plans. I have been telling him for a while we are not going to stand against having farm plans.

He has been like a dog with a bone, hopefully he will let it go now & put his energy's to something worth while.

4:22 pm



Text message





B

Bryce Mckenzie



Monday, 10 Nov • 7:42 am

Hi Andrew

There's 4 of us  
coming through to  
Wellington on the  
3rd December.

Any chance of  
catching up in the  
Morning?

Cheers Bryce

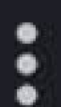
Might be some room  
suggest you send a



Text mes...



←  Bryce Mckenzie



31st December.

Any chance of catching up in the Morning?  
Cheers Bryce

Might be some room suggest you send a request email and office can see if they can slot you in.

Cheers

7:51 am

⊕ Text mes...

