

28 March 2021

Attn: Submission's Analysis Team
Climate Change Commission
PO Box 24448
Wellington 6142

BULLER DISTRICT COUNCIL SUBMISSION TO CLIMATE CHANGE COMMISSION

(Draft Advice for Consultation)

The Buller District Council's Position

The Buller District Council (the "Council") is clear in its acceptance of climate change science and agrees this is not up for debate. Reflecting this, Council has provided for its first steps towards addressing climate change mitigation and adaptation within its draft Long-Term Plan 2021 – 2031, allocating resources for wetland and estuarine restoration projects, native tree plantings, improved waste management practices, sustainability leadership initiatives, information management systems for Council infrastructure and assets, and upgrading Council's main place of work to reduce carbon-intensive energy consumption and achieve environmental and safety performance standards.

Council also recognises that, as 'place makers' for its communities, it has a leadership role in adapting to the inevitable change that is on its way. Council understands it must function as a facilitator for its people and as an information conduit between regional and central government, research institutes, special interest groups, iwi, its communities, and all the individuals that live within them. Council also knows that it must have the answers before its community begins to ask them. Council needs to be prepared and well-resourced, informed, transparent, fair, and able to act decisively and with certainty, to engender trust and function as beacons of hope when its communities' homes, livelihoods and ways of life come under threat.

Council strongly supports the overall position of the Climate Change Commission's (the "Commission") draft advice, and as a local government entity and community leader, is willing and ready to act as required to ensure its communities make the changes and sacrifices necessary to support the global emissions reduction targets stipulated in the Paris Agreement. Council does not wish to be party to underplaying the significance of the challenges ahead and place an unforgivable burden on future generations.

Council also wishes to raise a flag for the Buller District, now, to ensure its people get the support they are going to need to come through the next few decades with as little social disintegration as possible. To fully do this submission justice, Council first needs to provide the wider context of what life in the Buller District currently looks like and explain some of the challenges it faces.

The Buller District Today

The Buller District is not unfamiliar with adversity. It is an area of extremes; it is wild country, with wild weather. Natural hazards are part of life here, and these, coupled with the District's geographical isolation, have honed a resiliency and self-sufficiency in its people. However, the cumulative effect of several compounding challenges the District is now facing, elevates its vulnerability to the strategic mitigations detailed within the Commission's draft advice. These being:

- A high Job Seeker support rate of 12.3% (as at December 2020) that is over 3.5% higher than elsewhere on the West Coast, and over 5% higher than the national average,
- A socio-economic deprivation index of 9 (where 10 is the most deprived), and a ranking of 58th out of 67 territorial authorities (where place 67 is the most deprived),
- Over 87% of the District designated as conservation estate meaning that options for income generation from most of Buller's land holding is narrow,
- Heavy economic reliance on three major industries, these being coal mining, agriculture (principally dairy farming) and international tourism – each of these now under increasing threat and highly vulnerable because of the Covid-19 pandemic (tourism) and the implications from the Commission's draft advice (coal mining, agriculture and, potentially, tourism as well),
- Council's high reliance on rates (i.e., approaching 60%), and low ratepayer base meaning the resulting financial burden on ratepayers is nearing an unrealistic level,
- A long and thin geography with a remote and aging infrastructure and assets network (including closed landfills, roads, bridges, stormwater, wastewater, and flood protection assets) that is costly to maintain and increasingly exposed to pressure from coastal inundation, rising groundwater, and a forecast increase in rainfall, and
- A long, exposed coastline with deprived communities already feeling the effects of climate change from sea level rise and an increased incidence of high-intensity storm events.

Evidence has been compiled to support these statements and is provided as an appendix to this submission.

Concerning Lack of Representation

Council has noted, with considerable concern, the absence of the West Coast from current national data models managed by Taihoro Nukurangi NIWA as well as recent central government advice.

The Ministry for the Environment's December 2017 report "Coastal Hazards and Climate Change: guidance for local government" was produced for local councils in response to the climate change consequences already in effect. Figure 1 has been taken directly from this report and summarises findings from Wright's 2015 report, with no mention, or explanation as to the absence, of West Coast scenario data.

Figure 1: National coastal risk exposure, from 2015, but replicated within the Ministry for the Environment's advice for local government published in December 2017. What happened to the West Coast?



Additionally, the New Zealand Coastal Sensitivity Index (CSI) for inundation flooding from the sea presented in a Taihoro Nukurangi NIWA report published in 2012, albeit almost a decade old, fails to appreciate the significant vulnerability to sea level rise of much of the Northern Buller's coastline (Figure 2), and rates the Northern Buller's CSI as only slightly above 'moderate'. This is troubling to Council since many Northern Buller residents in the small townships of Hector and Granity have been experiencing devastating sea surge inundation well before this report was published (Figure 3).

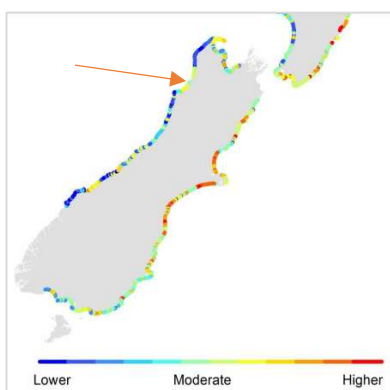


Figure 2: New Zealand Coastal Sensitivity Index (CSI) for inundation by the sea (NIWA, September 2012)



Figure 3: Photos (from 2006) included in MfE's December 2017 advice for local government, demonstrating that sea inundation has been occurring in Northern Buller for well over a decade.

It is important to Council and to the achievement of a 'just transition' that decisions are fully informed and founded in an authoritative, accurate and complete centralised data set from this point forward, and that the West Coast is appropriately represented as a result.

Council's message here is simple – please do not forget about the West Coast.

Some of Buller's communities are highly vulnerable to existing climate change impacts, as well as the coming mitigation activities outlined within the draft advice, and the eventual unavoidable adaptations i.e., staged retreat.

The Buller District's Council's Strategic Response

We know from the recent global pandemic response and remarkably rapid development of an effective vaccine that, when under pressure, people can be extraordinarily focussed, innovative and resourceful. However, humanity needs to take ingenuity and cooperation to a whole new level to reduce its impacts and achieve the sustainable development that will safeguard people and the planet in both the immediate and distant future.

Buller's local history has told us time and again that the people of the Buller District are a resilient people. We are willing to do what is required, as nationally mandated and lead by central government. It is Council's opinion that shifting the District's local economy, industries, businesses, infrastructure, and behaviours to achieve the nationally set emissions targets is both essential and achievable.

In response to the challenges bullet pointed above, Council has proactively led several initiatives to revitalise the District, encourage investment, and drive Buller's growth and prosperity over the past 5 years. Its previous two triennial Long-Term Plans have been geared towards economic diversification

and improving the District's socio-economic prosperity. Many positive outcomes for the District have resulted, including investment in new technologies and industry such as the recent whitebait farming initiative, and \$80M direct and indirect funding secured over a three-year period for revitalisation projects across the District.

Buller's current position would be considerably weaker if Council, and motivated parts of the community, had not acted. Council remains small and agile and excellently positioned to partner with iwi to continue its proactive work for its communities.

In response to the Commission's draft advice, Council has identified several specific opportunities and initiatives for supporting the Buller District through the changes that are coming over the next few decades. Some of these relate to mitigation activities, and others to adaptation activities. Council understands that some of what is presented here is beyond the scope of the submission. However, Council asks that this be presented to central government, including the Minister for the Environment and Climate Change and the Minister of Conservation, so that Buller's case for a just transition is well represented.

Support for Buller District's Mitigation

The climate change mitigations detailed in the Commission's draft advice and resulting strategic shifts will impact the District in several significant ways. Council can see many opportunities as well as challenges that must be addressed, and these are now discussed below.

1. Socio-Economic Matters

Council supports the package of recommendations and actions proposed by the Commission to increase the likelihood of an equitable, inclusive, and well-planned climate transition but adds the following comments:

As previously discussed, the District's economy is underpinned by three industries – mining, agriculture, and tourism.

Council, through collaborative effort with partner organisations such as Ngāti Waewae, Development West Coast, Department of Conservation, industry groups and community groups has geared its previous two Long-term Plans towards economic diversification and improving the District's socio-economic prosperity. Many initiatives have resulted including investment in new technologies and industry. However, the District's position remains vulnerable due to its heavy reliance on three economic pillars and will be made more so through strategic shifts towards carbon neutrality.

Council's request: That central government recognises the Buller District as a place that may be particularly affected by climate change and the transition to a low emissions economy, and provides expertise and resources (locally based or via some other mechanism) towards developing a districtwide, specific mitigation plan as well as a future-focused and climate friendly economic strategy for the Buller District (and wider West Coast region) for the coming decades for implementation by Council and Council Controlled Organisations.

2. Iwi as Partners

Council supports Enabling Recommendation 3 but adds the following comments:

Buller District Council recognises local iwi as mana whenua and as partners in climate change mitigation and adaptation strategies, as opposed to another stakeholder with whom we will consult. It is essential that Council supports iwi rights to exercise rangatiratanga and kaitiakitanga in a joint plan to reduce emissions. Currently, Ngāti Waewae is involved in decision making processes through non-elected member presence on Council and through

RMA processes. However, local iwi resources are currently stretched to their limit, and Council does not want to see difficulties with resourcing affect the opportunity for genuine partnership across the change process.

Council's request: That central government provides financial support for local iwi to establish and dedicate sufficient resources so they can genuinely participate as partners in the process of shifting the District to a carbon neutral economy.

3. Agricultural Sector

Council supports the package of recommendations and actions for the agriculture sector but adds the following comments:

Freshwater management and indigenous biodiversity imperatives are expected to lead to pastoral land being retired on river and wetland margins, and de-intensification of farming to reduce leaching into waterways. The full inclusion of agriculture in the emissions trading scheme from 2025 will add costs for the agriculture industry to offset their emissions, further incentivising deintensification. All of this will result in an increased burden on farmers.

Council's request: That central government funds locally based and accessible advisory services to help Buller's farmers transition to low-emission practices and achieve better animal, pasture, and feed management. The presence of locally based advisors will enable trust and ongoing relationships to be built with farmers, as well as having the added benefit of creating additional skilled jobs within the District.

Council also requests that central government continues to provide financial and technical support to landowners / farm managers for waterway protection, such as through the establishment of exclusion fencing and riparian planting buffers, as well as other environmental mitigation initiatives.

The small, low-lying country of the Netherlands is the second largest vegetable exporter in the world with exports totalling €6 billion annually. They achieve this through precision, hydroponic farming and use fewer pesticides than if producing in the soil or open air. Buller has an abundant annual rainfall, moderate sunshine hours, and large amounts of marginal land (not class 1 soils) available for conversion to glasshouse technology, as well as prospective energy-generation schemes (such as the Stockton Plateau Hydro Scheme) that will generate lower cost energy locally and enable new industry. With the planned strategy and investment to shift freight from road to rail, and the upgrade of Westport's Port already underway for less time critical produce, Buller's isolation may no longer prove an insurmountable barrier to the establishment of large-scale horticulture activity within the District.

Council's request: That central government provides funding for pre-feasibility studies and/or seed funding to identify whether the establishment of glasshouse-based horticulture within the District is feasible and worthy of greater thought and investment.

4. Heat, Industry and Power Sector

Council supports the package of recommendations and actions for the heat, industry and power sectors but adds the following comments:

Resource mining (predominantly high-quality coking coal) within the Buller District currently accounts for a third of primary sector employment in the District and is the largest of the District's economies contributing 33% of the District's annual GDP (year end, March 2020).

High temperature process heat used in steel manufacture, and generated during the burning of high-quality coking coal, is particularly challenging to decarbonise and is recognised as a

'hard to abate industry'. Emerging steel manufacture technologies are unlikely to be available until at least 2035. However, as international pressure to reduce carbon emissions increases, additional focus on, and investment in, technological advancements away from coking-coal may bring the development of these future technologies forward. This leaves Council and its communities in the uncomfortable position of knowing that coking coal obsolescence is coming, but not when. We are therefore poorly placed to be able to provide for the Buller District's economic transition and ongoing prosperity.

Council's request: That support is provided by appropriate central government agencies to develop a strategy for identifying the likely timeframe remaining for international markets of high value coking coal to enable a District-specific transition plan away from coking coal to be developed.

The Commission's draft advice includes the need to (almost) entirely eliminate fossil fuel use from the heat, industry and power sector and "this means ending the use of [thermal] coal". New technologies regarding biofuels and hydrogen will be developed. Although a much smaller industry than coking coal within the District, a move to thermal coal obsolescence will mean that many people will need to develop alternative careers. These people will have transferrable and important skills that will be valuable in other sectors and new industries.

Council's request: That consideration be given to Buller as a potential location or 'hub' for investment in future technologies and new industry based on these emerging technologies.

The elimination of thermal coal for home heating purposes will have a significant adverse impact upon many people / families who rely on the comparative affordability of thermal coal to heat their homes and water during the winter months. Financial support will be needed to help homeowners transition their homes to low emission energy sources. Homeowners and renters will also require ongoing financial support to meet higher power charges that result from using cleaner, but more expensive, technology.

Council's request: That financial support be provided by central government to people and families experiencing socio-economic vulnerability to enable homeowners to transition their homes to low emission energy sources and provide ongoing financial support to people struggling to heat their homes and water because of the transition.

Council's request: That central government enables and fosters community resilience by way of funding pre-feasibility studies that investigate the establishment of locally based micro generation / solar energy schemes for domestic heating purposes.

The Commission's draft advice means a shift towards total reliance on renewable energy sources. The Buller District experiences significant rainfall, and this is forecast to increase with the changing climate. The consented Stockton Plateau Hydro Scheme has been designed with four-fold benefits: amelioration of legacy Acid Mine Drainage freshwater contamination; contribution to the national shift towards renewable energy sources; a reduction in electricity charges to Buller residents (which are currently among the highest across New Zealand) as well as transmission losses; and the creation of additional skilled employment opportunities within the District.

5. Transport Sector

Council supports the package of recommendations and actions for the transport sector but adds the following comments:

The Commission's draft advice requires an almost complete decarbonisation of land transport. Council understands the importance of public transport. Unfortunately, the District's low density and widely distributed population makes headway in this area difficult.

However, Council can encourage the utilisation of other lower carbon-dependent modes of transport within the District, including carpooling (using ride-sharing applications or similar), walking, and cycling, as well as through encouraging remote working opportunities.

Decarbonisation of the transport industry will require immediate increased investment in light electric vehicles as well as shifting freight from the road network to rail. The West Coast currently has one of the lowest rates of EV charging stations per kilometre of State Highway across New Zealand.

Council's request: That central government financially supports the development of a programme for the installation of EV charging stations across the District (as well as the rest of the West Coast).

The Buller District Council, in conjunction with the other West Coast Councils, Development West Coast and KiwiRail, is seeking to develop a multi-mode, regional Transport and Logistics Strategy that will address decarbonisation, identify opportunities to leverage and enhance existing infrastructure (such as the regional Ports) to create economic growth, and seek to replace a managed decline in coal volumes produced within the District. How inter-related strategies link together to increase the total benefit to the region as well as how activities to support de-carbonization, including alternative fuel sources e.g., Hydrogen, will be addressed.

Council's request: That central government financially supports Councils across the West Coast to develop and enable a multi-mode approach to transport and logistics for the region.

6. Waste Sector

Council supports the package of recommendations and actions for the waste sector but adds the following comments:

System-wide transformation is required in the way waste is managed. Council's Waste Management Strategy has identified five specific opportunities for innovation and improvement that will reduce the District's organic waste to landfill, reduce biogenic emissions associated with historic legacy issues, and improve waste reuse and recovery. All these initiatives are currently at the scoping phase in preparation for submission to the Waste Minimisation Fund in May 2021.

Council's request: That central government, through the Waste Minimisation Fund, approves Council's five initiatives to improve waste management practices across the District, reduce waste through locally based circular economy initiatives, remediate historic waste leachate from closed District landfills, and reduce emissions from organic waste decomposition.

7. Local Investments in Green Technologies and Solutions

Council supports the Commission's focus on growing new native forests to create a long-lived source of carbon removals but adds the following comments:

Council strongly suggests that marginal land within the District be considered for large-scale native planting initiatives.

Council understands that planting native trees, as opposed to exotic forestry, is key to mitigating climate emissions through increasing carbon sinks, realising co-benefits for biodiversity, and better water and soil management, and protecting carbon stores through ongoing predator and weed control programmes. Buller is well-positioned as a location for large-scale, native planting initiatives as the following explains.

The Buller District has a high annual rainfall and mild climate that supports good growing conditions. Additionally, the Buller District has publicly held marginal land that is well-suited to native forest restoration through active planting and ongoing management. Privately held marginal land may also be made available to native plantings within a framework that makes it attractive for private landowners to participate.

Through the presence of extractive industry developments within Buller for over 150 years, and the rehabilitation requirements associated within these large developments, the District has developed an extremely high level of competency in the provision of ground-based environmental services. Buller has several local contracting companies that have decades of experience in fulfilling native planting contracts, biodiversity management projects, and the design, implementation, and monitoring of effective predator control and weed control programmes.

Council produces a biosolids product within Westport that currently has no end use. One of the five waste initiatives (mentioned in the Waste section above) involves the use of biosolids in the generation of a compost product that may have suitability as a nutrient boost for large-scale native plantings. A small-scale pilot study, if application to the Waste Minimisation Fund is successful, will inform the compost 'recipe' and confirm its potential end uses. Council believes this initiative could act as a flagship project for the District and contribute to the circular economy envisaged by the Commission.

To support large-scale native planting, Council has developed a business case for a locally based native plant nursery which shows financial sustainability and net profit for at least two decades on the back of a comparatively minor capital investment.

Council's request: That central government facilitates the process for securing the capital investment of \$670,000 to establish a native plant nursery within the District. Council will pursue funding opportunities with central government (and alternative sources), with three-fold benefits: the production of native plants to feed carbon sink initiatives and support a carbon neutral economy; the production of native plants for riparian planting and wetland restoration to improve local freshwater and biodiversity management; and the creation of a new green industry and additional employment opportunities within the District.

Blue-green initiatives, such as the restoration of estuarine salt marshes, are multipurpose, 'no regret' solutions that simultaneously provide cultural, environmental, social, and economic benefits and help build climate resilience. They support the Māori values of mauri, wai ora, and various taonga species, enhance coastal defence, support high levels of biodiversity, filter water, and have significantly higher carbon sequestration rates than inland freshwater wetland systems. Council is aware of research currently underway to develop and establish Blue Carbon Credits based on the restoration of salt marshes. Work within the District is underway to develop funding pathways that support the restoration of Westport's coastal wetlands and salt marshes.

Council's request: That central government recognises its role in the provision of funding through approving applications to the Freshwater Improvement Fund (including the Orowaiti Restoration Project EOI) and Te Mana o te Wai Fund that have the dual benefits of improved freshwater management as well as carbon sequestration outcomes.

Public conservation land comprises approximately 87% of the Buller District's land tenure. However, not all this land is of high conservation status, and a rationalisation of this land may make available lower value land for more beneficial purposes. Council is highly motivated to understand if there are areas of land that can be put to better use potentially for restoration activities or other 'green' purpose.

Additionally, Council is interested in developing ways in which conservation activity on private land can be better rewarded and supported such as through rates abatement mechanisms or facilitating the flow of Carbon Credits from within the District to market.

8. Education, Training and Reskilling

The percentage of Buller District school leavers and youth receiving tertiary education is low in comparison with the national average. Unless intervention is used, it is likely that District tertiary education levels will drop further as extractive resource-based industry training and education opportunities offered within the District lose relevance.

As local economies transition towards sustainable industries and opportunities, locally based tertiary facilities (such as the Tai Poutini campuses in Westport, Reefton, and Greymouth) will be required to offer training and reskilling for 'green' growth sectors and other future growth industries. To retain people needing to reskill, school leavers and youth in our District, and build on Buller's self-sufficiency and resilience, locally based tertiary facilities will require strategic investment to achieve effective transition planning for the educational opportunities they provide.

Council's request: That central government invests in a strategic transition plan for the Buller District's tertiary education opportunities to rescope offerings more in line with future industries and employment opportunities.

9. Legislation, Alignment and Funding

Council supports Enabling Recommendation 4 but adds the following comments:

In 2018 the Local Government Commission released a proposal for local government reorganisation on the West Coast. The Local Government Commission recommended transferring the statutory obligations for preparing district plans from the three West Coast district councils to the West Coast Regional Council. This process has commenced and is referred to as the Te Tai o Poutini Plan (TTPP) process. Development of the TTPP has a 5-year timeframe, with the draft TTPP not likely until 2024 or later.

Current funding constraints mean that desktop studies, instead of field-based assessments, are being used to inform significant land designation decisions. Sufficient funding would enable a comprehensive and robust process to identify land requiring special designations, including Significant Natural Areas and coastal risk and hazards areas.

Council's request: That sufficient financial support is provided to ensure that the TTPP becomes an exemplar regional plan that effectively incorporates specific land designations, climate change mitigation and adaptation considerations against the backdrop of RMA reform.

Council's District Plan (the "Plan") is now over 20 years old, and its regulatory mechanisms provide little guidance or control regarding developments within potential climate change 'zones'. Development, including coastal and near coastal sub-divisions are still occurring at pace. Although Council has discretion regarding the consenting of subdivisions, there is little guidance within the Plan regarding this, and there is no climate change model or data to back up decision making. This leaves us in the vulnerable position of approving development that will possibly be 'at risk' in the future and puts us in the unenviable position of "being sued if we do and sued if we don't" (pers. comm. Catherine Iorns, Professor of Law Victoria University Local Government Symposium).

Council's request: That central government provides Council with immediate (i.e., within the next 3 – 6 months), unequivocal guidance regarding the District's ongoing development

within possible 'at risk' areas and supports this guidance with District-specific data modelling and risk assessments.

Council understands that central government is working towards finalising a work plan on how alignment and funding will be addressed between central and local government by 31 December 2022. However, for the Buller District Council to proactively plan for the District's future, Council needs surety around alignment and funding models much earlier than the current anticipated timeframe will allow.

Council's request: We strongly advocate for a compression of the current timeframe of 31 December 2022. If this is not achievable due to constraints of which we are unaware, we suggest a portion of advanced funding be made available so Council can commence work on the more immediate priorities such as engaging with communities regarding their climate change perceptions and values and mitigation-related activities, as well as district wide risk profiling and mapping.

Support for the Buller District's Adaptation

The New Zealand Productivity Commission (November 2019) has identified planning for and adapting to climate change as a major increasing cost pressure on local government. The body of work that Council needs to put in train to prepare its District for inevitable climate change adaptations is financially well out of current reach. As such, we ask that central government considers the suggestions and requests within the following section.

1. Buller District's risk profile

To plan for the future, we need to know what it is likely to look like. We need to know the risk profile for the District's infrastructure and assets, buildings, communities, and land. The costs of modelling scenarios and developing district-wide risk profiles are significant and are beyond the current budget and resources of Council. Additionally, it is not efficient for each council to run their own resilience risk assessment, mapping, and profiling process. Undertaking risk mapping at a regional level would provide consistency and economies of scale. This would ensure that significant resilience gaps are identified and provide a consistent, robust, evidence-base for managing these gaps.

As an example, the Buller District has a few coastally located landfills (many historic and now closed) that are threatened by sea level rise and inundation. The exposure of historic waste from a closed landfill at Hector during ex-Cyclone Fehi in 2018 illustrates the significant environmental risks and liability associated with surge inundation and historic Council assets.

Council has subsequently commenced the process of strategically identifying assets that may be 'at-risk' from climate change. However, this initial 'at-risk' register needs to be qualified via detailed scenario modelling and region wide risk profiling.

Council's request: That the Buller District Council, and those across the rest of the West Coast, secures financial and/or technical support from central government to develop detailed scenario modelling and region wide risk profiling to inform future decision making around what is at risk, what to protect, what to surrender, and when to retreat.

Once confirmed, each 'at-risk' asset will require options analysis for ongoing management, relinquishment or in perpetuity protection. As the detail regarding these assets is firmed up over the coming 6 – 12 months, Council will require support in the form of technical resourcing to undertake the necessary options analysis.

2. Communities, Infrastructure and Assets at Risk

Local councils are the governing body closest to communities and have a clear role in supporting community wellbeing and preparing for change in the face of adverse climate impacts. We are also the owners of a large amount of the infrastructure and assets directly at risk from the impacts of climate change.

Council's request: That central government provides advice and sets in place mechanisms that guide Council's:

- 1. Transitioning from infrastructure and asset protection and renewal towards decisions regarding permanent relinquishment and abandonment; and**
- 2. Decision-making processes for setting in motion staged retreat for the Buller communities vulnerable to the physical effects of climate change e.g., Hector and Gracity.**

Summary

Council recognises that it has made several requests of central government for financial and other forms of support to address inevitable climate related changes. It does so on the basis that it will never be more affordable to do so than now, nor will the opportunities be greater from acting quickly. The United Nations, in its 'Making Peace with Nature' report (February 2021), states that the cost of doing nothing, measured in terms of damages from future climate change, far exceeds the cost of investing in mitigation, and that "fundamental, system-wide reorganization requires significant upfront investment but can generate large positive returns".

Therefore, Council:

1. Strongly supports the Commission's draft advice regarding an equitable, inclusive, and just transition to protect and support the most disadvantaged and those least able to adjust,
2. Requests a focussed and targeted response from central government that recognises and is proportionate to need, and extends any coordinated and centrally funded support first to districts that most need it, and
3. Requests that central government considers the Buller District Council as a willing, committed, and agile partner for the purposes of trialling and proving mitigation and adaptation initiatives for wider roll out or scaling up in other districts.

As a Council and community leader, we accept the importance of acting now – no matter how challenging or costly the strategic shifts may be – as we know the costs associated with postponing unavoidable change, in terms of physical impacts associated with 'unmitigated' climate change, will be much greater. In fact, avoiding the pain and sacrifice now will only place an indefensible burden on coming generations.

We strongly urge the Commission to recognise the Buller District's unique risk profile within the final advice presented to central government and we ask this so that the District (and its most vulnerable communities and people) receives a fair and just support.

Yours faithfully,



Sharon Mason
CEO
Buller District Council

Appendix: Supporting Evidence

Māori settlement in the Buller District was founded in the pounamu trade and the District has a rich and early history documented as far back as 1350 AD. European settlement developed on the back of the extractive industries in 1860's; gold initially, followed by coal. Cycles of 'boom and bust' have resulted in significant population expansions and contractions throughout its history and driven economic growth and prosperity when things were going well, as well as loss of social cohesion and considerable economic degeneration when things were not.

The District's population was in steady decline up to 2002 but began to grow over the period of 2006 to 2012 on the back of a boom in coal mining. As jobs were shed in coal mining, and the trickle on effect was felt by other industries, the population went into decline again, reaching a population of 9,610 in 2020. This represents the District's lowest population in over 25 years, with approximately 11% fewer residents than at the previous peak in 2012. The Covid-19 Pandemic has led to further job losses, leaving the Buller District with a 'working age population receiving Job Seeker support', higher than elsewhere along the West Coast, and more than 5% higher than the national average (Figure 1A).



	Jan 2020	Dec 2020
Buller	10.3%	12.3%
West Coast	6.5%	8.6%
New Zealand	4.9%	7.0%

Source: MSD

Figure 1A: Working-age population receiving jobseeker support (Jan and Dec 2020) in the Buller District, the West Coast region, and New Zealand.

(source: Ministry of Social Development)

The Territorial Authority socio-economic deprivation index currently ranks Buller as 58th out of the country's 67 Territorial Authorities, with the Buller District achieving an overall deprivation score of 9 (with 10 being the highest possible level of deprivation) (Figure 2A). Figure 3A corroborates Buller's struggles by way of accommodation supplement recipients as a percentage of population across all 67 Territorial Authorities.

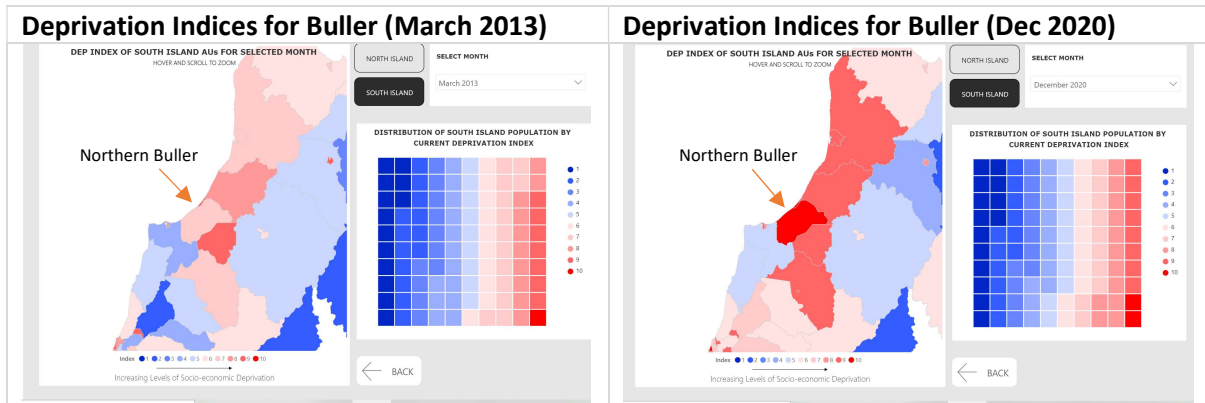


Figure 2A: Deprivation indices for Buller District 2013 versus 2020 shows marked decline across the District, especially the Northern Buller (source: Dot Loves Data)

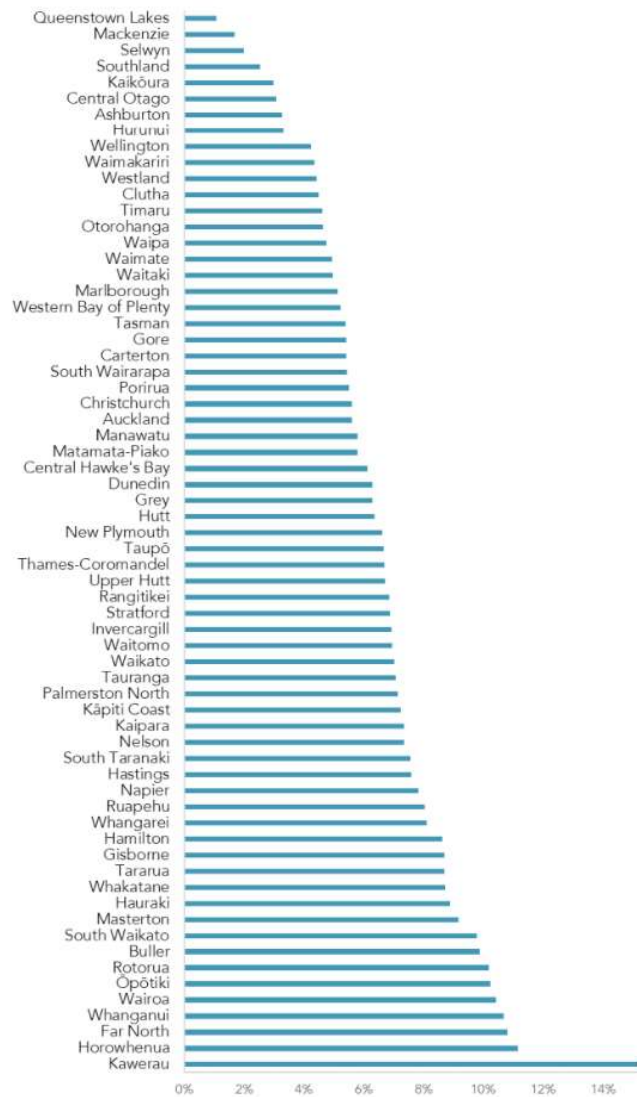


Figure 3A: Accommodation supplement recipients as a percentage of population (used as an indicator of economic deprivation) across the 67 Territorial Authorities of New Zealand, 2019.

(source: Ministry of Social Development)

The District's economy is heavily reliant on three major economies, these being coal mining, agriculture (principally dairy farming), and international tourism – each of these now under increasing threat and highly vulnerable because of the Covid-19 pandemic (tourism) and the implications from the draft advice released by the Commission (coal mining, agriculture and, potentially, tourism as well).

The Buller District is geographically expansive, isolated, and sparsely populated, with over 87% of the District designated as conservation estate (Figures 4A and 5A). These factors combine such that options for income generation from most of Buller's land holding is narrow, and almost 60% of Council's income is ratepayer sourced. Rates across rural Territorial Authorities across Aotearoa have been increasing over the past two decades (Figure 6A).

Now, the resulting burden on our ratepayers is nearing an unrealistic level.

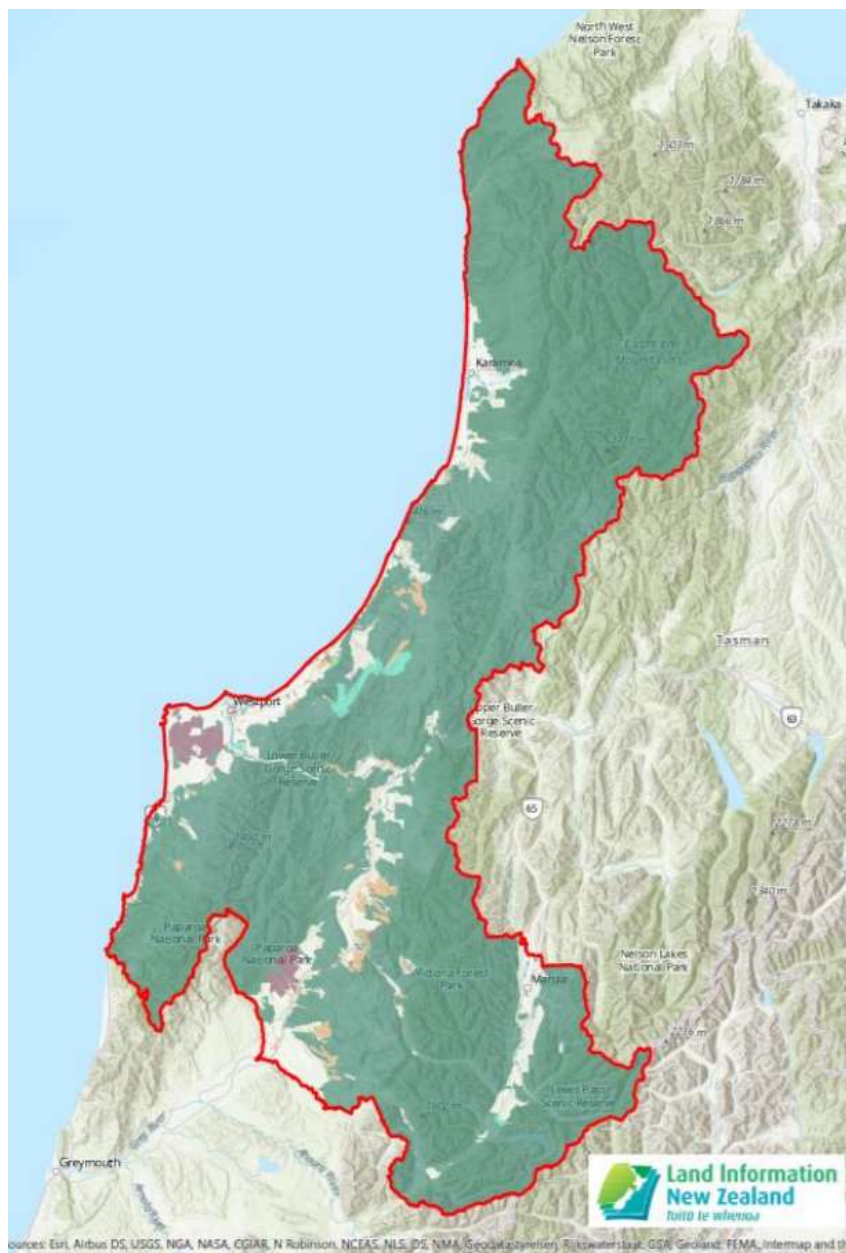


Figure 4A: Conservation Land (dark green) makes up the vast majority of the Buller District's land designations.

(source: NZ Productivity Commission, 2019)

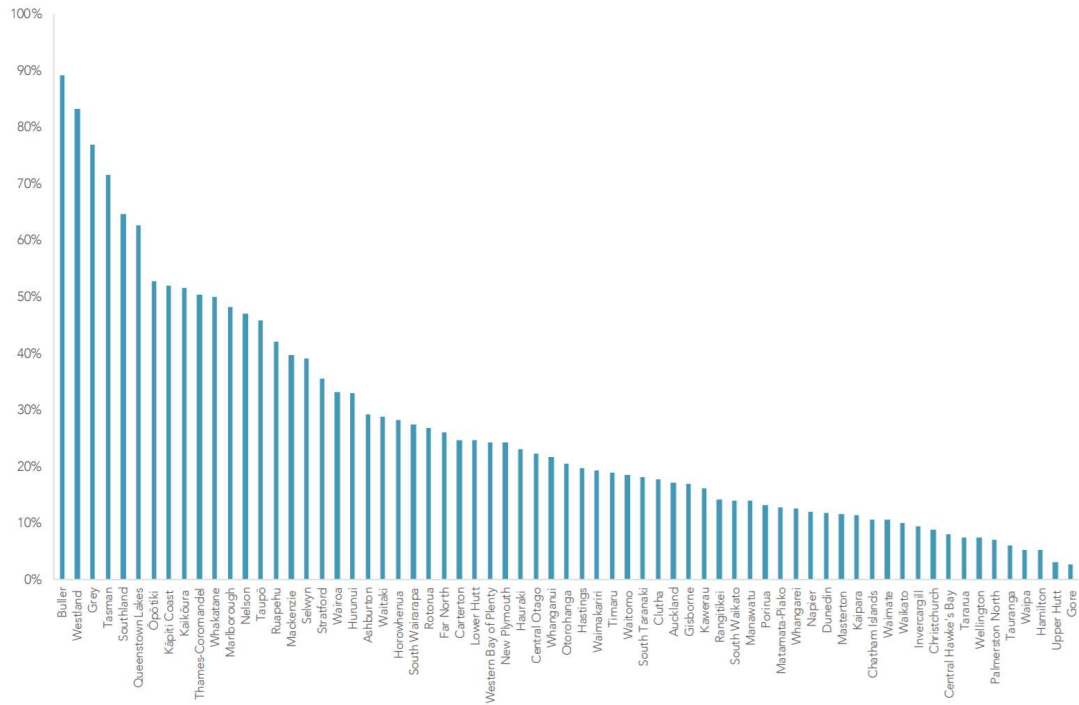


Figure 5A: Crown land as a proportion of Territorial Authority Land.

(source: NZ Productivity Commission, 2019)

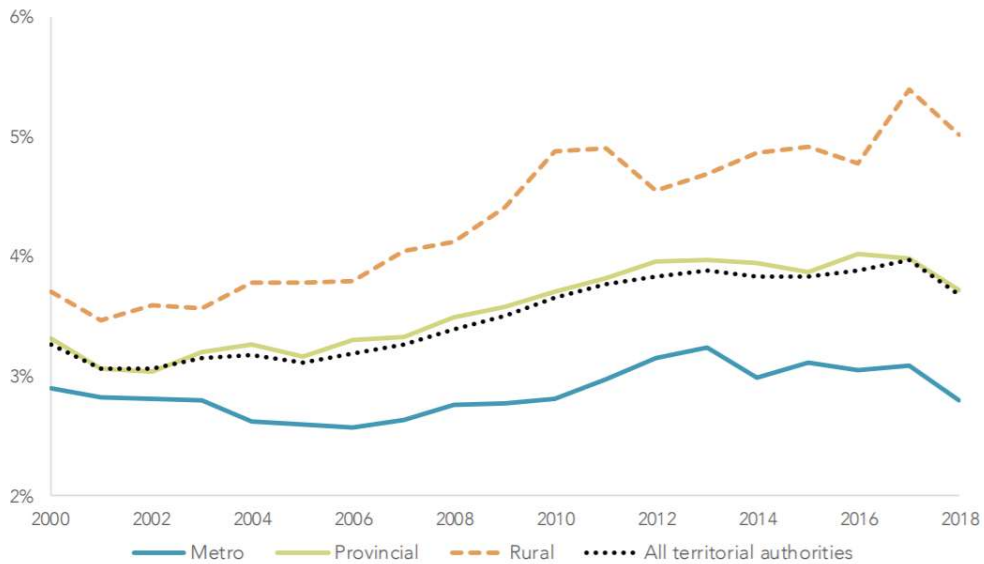


Figure 6A: Rates per person as a percentage of median adult personal incomes, 2000 – 2018.

(source: NZ Productivity Commission, 2019)

The Case of Northern Buller

As shown in Figure 2A, Northern Buller has shifted from a 6 to a 10 (greatest level of deprivation) on the Territorial Authority deprivation index over the past decade. The townships of Hector and Gracity are nestled in the heart of Northern Buller and are thinly spread along a narrow strip of coastal land that lies between the Tasman Sea and the coal-rich and mountainous Stockton Plateau. Unemployment in the towns is high, and the median household income in both Hector and Gracity is half the national average.

Over the past two decades, the Tasman sea has repeatedly pushed huge swells into the properties and homes of many of the towns' residents. In 2017, NIWA coastal engineer Rob Bell stated that both Hector and Gracity are in imminent threat of inundation. As a result, residents in Hector have paid more than \$10,000 each for protection from the sea. However, they will eventually have to leave their homes (Figure 7A).



Figure 7A: A Gracity resident surveys his property in the wake of Ex-Cyclone Fehi (2018).

(source: Stuff website)

A 2015 report by Parliamentary Commissioner of the Environment Dr Jan Wright identified about 9000 New Zealand properties that were less than 50cm above spring high tide levels, almost certainly at risk of future hazards. However, the figures were likely to be underestimated, considering accurate elevation data was not available for areas such as the West Coast. Wright emphasised the long-term nature of coastal hazards in her report, likening it to a "slowly unfolding red-zone" – it would require cautious, deliberate and, perhaps most importantly, empathetic planning.

Expert advice from NIWA is to move away from the shore, but this is cost prohibitive. It is without a doubt that climate change will exacerbate the extreme poverty of the Hector and Gracity residents who do not have the financial resources required to relocate.