Ministry for the Environment
Manatū Mō Te Taiao

PO Box 10362, Wellington 6143
Website: www.mfe.govt.nz
Freephone: 0800 499 700

18-D-02521

s 9(2)(a) [redacted]
[redacted]
Office of Todd Muller
Parliament House, s 9(2)(a) [redacted]
[redacted]

Dear s 9(2)(a) [redacted]

Thank you for your email of 23 November 2018 requesting information under the Official Information Act 1982 (The Act).

The following part of your request was transferred to the Ministry for Ministry of Foreign Affairs and Trade and the Ministry for Primary Industries on 13 December 2018:

> *"New Zealand's Submission to the UNFCCC on the Response Measures Forum.*
> *New Zealand participation in international collaborative initiatives on climate change.*
> *Carbon Neutrality Coalition Plan of Action.*
> *Any quarterly updates (from 2018) regarding New Zealand's participation in the Global Research Alliance on Agricultural Greenhouse Gases."*

I am responding to the remaining part of your request for:

> *Any advice provided to Minister's in 2018 regarding national environmental standards for small-scale wind*

There is one document in scope of your request: '*Request for advice: national environmental standard for small-scale wind*'.

The above document is being partially released to you. Information has been withheld under the following sections of the Act:

- 9(2)(a): to protect the privacy of natural persons
- 9(2)(ba)(i): where making this information available would likely prejudice the supply of similar information from the same source
- 9(2)(f)(iv): to maintain the confidentiality of advice tendered by officials
- 9(2)(g)(i): to maintain the effective conduct of public affairs through the free and frank expression of opinions

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You might be interested that we are working with Ministers to release an updated forward agenda for national direction under the Resource Management Act 1991. The forward agenda will communicate the Government's priorities for national direction programme. This will update the 2016 forward agenda.

Also of relevance, the Interim Climate Change Committee (ICCC) will be delivering evidence and analysis on the likely options, costs and practicality of how New Zealand can move toward 100 percent low emission electricity by 2035 including technological and systemic changes in electricity supply and changes in electricity demand. Officials are preparing to provide advice on the results and recommendations of the ICCC and in the longer term, the Climate Change Commission. Part of this response will include policy options to facilitate higher levels of renewable electricity.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Sincerely

Paul Alexander
Programme Director, Climate Change

Request for advice: national environmental standard for small-scale wind

Date Submitted:	6 August 2018	Tracking #: 2018-B-04769	
Security Level	UNCLASSIFIED	MfE Priority:	Non-Urgent

	Action sought:	Response by:
To Hon James Shaw, Minister for Climate Change	Decision	17 August

Actions for Minister's Office Staff	**Forward** this report to Hon David Parker, Minister for the Environment and Hon Megan Woods, Minister of Energy and Resources **Return** the signed report to MfE.
Number of Attachments 1	Titles of attachments: 1. National direction tools under the RMA
Note any feedback on the quality of the report	

Ministry for the Environment contacts

Position	Name	Cell phone	1st contact
Responsible Manager	David Chittenden	s 9(2)(a)	
Programme Director	Paul Alexander		✓
Deputy Secretary	Cheryl Barnes		

Request for advice: national environmental standard for small-scale wind

Key Messages

1. This briefing provides you with information and preliminary advice on the potential for a national environmental standard (NES) under the Resource Management Act 1991 (RMA) for small-scale wind. This was developed in response to your request for advice following an email from Blueskin Energy which proposed a NES as a tool to increase the uptake of small-scale wind generation.
2. Our preliminary view is that while a NES would likely provide some support to small-scale wind, at this stage we do not consider it to be significant enough to warrant investment. This is primarily because:
    - Wind generation is subject to economies of scale. Overall, we expect small scale wind to make up a very small proportion of our future wind portfolio. This means it might not be a priority for regulatory intervention.
    - While a NES could set standards for impacts such as noise which could help local authorities assess its impacts, a NES would be unable to resolve other perceived barriers to wind generation. A NES cannot permit activities with significant environmental effects, and councils are still required to balance the provisions of the National Policy Statement for Renewable Energy Generation (NPS-REG) against other considerations such as amenity values, when making consenting decisions.
    - National direction tools can only influence planning and consenting decisions, and the remainder of the decisions to construct electricity infrastructure are market driven. Market forces can have a greater impact on the viability of wind generation than the planning system, as evidenced by the significant difference between the 700 MW (megawatts) of wind capacity currently installed and the 2,500 MW of consented wind generation yet to be built.
3. This is not to say that the role of the planning system should not be considered more broadly to ensure it supports renewable energy generation. The NPS-REG (which covers small-scale wind generation) was evaluated in 2016. The evaluation found that the objectives of the NPS REG are in line with the Government's strategic direction to transition towards a low-carbon economy and to promote the use of renewable energy.
4. However it also found that the NPS-REG is yet to be fully 'tested' and could potentially have more impact on decision making under the RMA when there is more pressure to increase electricity supply in New Zealand.
5. As work of the Interim Climate Change Committee progresses, and as we determine the response to the Productivity Commission's low emissions economy report, we will have a clearer picture of the barriers and incentives needed to achieve lower emission energy targets. We can then better consider the role of the resource management planning and consenting system and what national direction instruments, such as a NES on small-scale wind, will be the most valuable and effective.

Recommendations

6. We recommend that you:

   a. **Note** that the Productivity Commission and the Interim Climate Change Committee will make recommendations on how New Zealand can move toward low emission electricity

   b. **Note** officials will consider the role of the resource management planning and consenting system, including national direction instruments, in supporting the uptake of renewable electricity in response to the Interim Climate Change Committee's recommendations

   c. **Note** that at this preliminary stage, we do not consider a national environmental standard on small-scale wind to be a priority for investment

   d. **Agree** that a national environmental standard on small scale wind not be progressed at this time

      Yes/No

   e. **Agree** to forward this advice to Hon David Parker, Minister for the Environment and Hon Megan Woods, Minister of Energy and Resources for their information.

      Yes/No

Signature

Paul Alexander
Programme Director, Transit on Hub

David Chittenden
Manager, Urban and Infrastructure Policy

Hon James Shaw
Minister for Climate Change **Date**

Request for advice: national environmental standard for small-scale wind

Supporting material

Context

1. On Monday 16 July, you received an email from Scott Willis of Blueskin Energy suggesting that a national environmental standard (NES) under the Resource Management Act 1991 (RMA) would support the uptake of small-scale wind operations.
2. Scott Willis met with Minister Woods to discuss this matter on Thursday 21 June.
3. In summary, Mr Willis argues that the National Policy Statement for Renewable Electricity Generation (NPS-REG) is not sufficiently enabling small-scale wind generation and proposes that a NES would help facilitate local decision making.
4. You requested advice from officials in response to the issues he raised
5. This briefing provides background information and initial advice on the merits of small-scale wind and the use of a national direction tool to support its uptake. Further analysis would be required to offer a fuller assessment of the costs and benefits of national direction or other possible interventions.

Background on the Blueskin entities

6. Blueskin Resilient Communities Trust (BRCT) is a charitable trust formed in 2008, which works on creating local climate solutions. Jeanette Fitzsimons CNZM is their patron. BRCT's projects are focused in Blueskin Bay and surrounding communities in coastal Otago. The Trust sees itself as contributing to national solutions to climate change as well as promoting a sustainable and resilient community as a model for other communities to learn from.
7. Blueskin Energy Limited is a social enterprise established by BRCT to develop local green energy projects and to develop national relationships to advance this cause. Between 2009 and 2017, Blueskin Energy Limited pursued establishment of a community scale wind generation project in Blueskin Bay near Dunedin. The Environment Court ultimately declined consent in 2017 on the basis of visual amenity value of the land.
8. Blueskin Energy Limited launched Blueskin Energy Network (BEN) in December 2017. BEN is a retail platform and smart grid marketplace designed to enable a much greater use of renewable technology such as wind and solar energy. BEN allows residents of Blueskin Bay and some other regions on the PowerNet distribution network to buy electricity from neighbours who have surplus generation from their own solar panels or small wind turbines connected to the local distribution network.
9. These entities are collectively referred to as "Blueskin Energy".

Small-scale wind generation

10. There is no specific definition of 'small-scale wind'. To some people it means household scale wind turbines, and to others, a small wind farm of utility-scale turbines. Considering utility scale turbines (e.g. taller than 30 metres hub height), we note that all else being equal, small-scale wind projects result in higher-cost electricity. This is because:
    - There are typically economies of scale with wind farms

- Modern wind turbines deliver lower-cost electricity in-part by increasing turbine size (e.g. 100 metre hub heights).[1]

11. While small scale wind may not be as cost effective, it may have benefits in providing increased community resilience and in improved community buy-in to local generation.

Overall, we expect small-scale wind to make up a very small proportion of future wind portfolio which might not make it a priority for regulation

12. In New Zealand we have exceptional wind resources. Over 40,000 megawatts of wind potential has been identified. This is far more wind capacity than we need (even with widespread electrification of transport and other parts of the energy sector). There has been more than 2,500 MW (megawatts) of consented wind generation that is yet to be built.[2] This is a substantial amount of consented wind, considering the current installed wind capacity is less than 700 MW.
13. New Zealand has choices about which wind sites we use – we do not need to develop small-scale projects unless they offer benefits compared to other wind projects. The electricity sector can choose the most cost-effective sites (to maintain affordability of electricity) that minimise effects.
14. Overall, we expect small-scale wind to make up a very small proportion of our future wind portfolio. As noted above, the economics of small-scale wind are a key factor. Seven small-scale wind farms have been built to date (showing that they can be successfully developed), but these projects only make up less than 3% of our total wind installed capacity.
15. While wind farms are subject to economies of scale, the consenting costs do not contribute to this. Information provided by Blueskin about consenting costs (including an allowance for pro bono work) shows that consenting costs are very similar on a 'dollars per megawatt' basis to larger scale wind farms. That is, the consenting costs of small-scale wind are far lower in absolute terms, than the costs of consenting larger projects.

All wind farms, irrespective of scale, have effects to be managed

16. Smaller wind farms do not necessarily have fewer or lesser effects than larger scale wind projects. This is because drawing comparisons between small and large wind farms should compare the number of small wind farms required to produce the same amount of electricity as a larger wind farm. Given that small-scale wind projects often use lower hub-height turbines, more turbines are required to deliver the same electrical energy than for a larger scale wind project.
17. Therefore, the cumulative impact of small-scale wind farms (to deliver the same energy as a larger scale project) can have similar (or even greater) effects than larger scale projects.
18. The choice of wind farm location, scale and technology type is currently market-led. This helps ensure electricity is affordable and that we have a secure supply system. Our view is that the environmental effects of proposed wind farms should continue to be assessed against the relevant regional or district plan provisions regardless of their scale.

[1] Larger turbines require wider access roads and larger specialist cranes for construction. So the larger turbines that give rise to lower electricity costs are most likely to be used on medium to large scale wind projects.

[2] From Electricity Authority website

19. National direction can be used to direct and guide local government planning and decision making through a range of statutory and non-statutory mechanisms. Statutory mechanisms include national policy statements (NPS), the New Zealand Coastal Policy Statement, national environmental standards (NES), section 360 regulations, and national planning standards. A table which provides more detail on available national direction instruments is included in Appendix 1.

20. National direction supports councils in their decision making by setting out more explicit guidance on the matters of national importance, and other matters listed in Part 2 of the RMA. The benefits of renewable energy are recognised explicitly as a matter to which decision-makers are required to have particular regard under section 7. Additionally, further guidance is provided through the existing National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG), as discussed below. It is the Minister for the Environment's statutory role to recommend the making of any national direction under the RMA.

Small-scale wind generation is covered under the existing NPS-REG

21. Renewable electricity generation is currently covered by the NPS REG which became operative in 2011. The NPS-REG directs local authorities to recognise the significance of renewable electricity generation (REG) and requires the introduction of objectives, policies and methods to provide for REG activities in their RMA plans.

22. The NPS-REG applies to REG activities at any scale and covers the construction, operation and maintenance of structures associated with REG. The NPS-REG requires local authorities to include provisions within regional policy statements and regional and district plans that provide for the development, operation, maintenance, and upgrading of new and existing REG activities. Policy F of the NPS-REG requires plans to include provisions that provide for wind and small or community-scale energy generation. The NPS-REG must also be given effect to in resource consenting decisions.

23. The NPS-REG also allows decision makers to have regard to offsetting measures or environmental compensation (when considering any residual environmental effects of REG activities that cannot be avoided, remedied or mitigated), as well as the provision to manage reverse sensitivity.

A recent evaluation of the NPS-REG found that it reasonably enables renewable electricity generation

24. An evaluation of how councils across the country have given effect to the NPS-REG was carried out in 2016. The evaluation found that most district plans that have implemented the NPS-REG are reasonably enabling for REG projects, particularly for small and community scale generation. The evaluation found no technical problems, unforeseen consequences, or issues with the NPS-REG that require urgent attention. The objectives of the NPS-REG were found to be in line with the Government's strategic direction to transition towards a low-carbon economy and to promote the use of renewable energy.

25. However, the evaluation did conclude that in 2016:

    - the introduction of the NPS-REG had not noticeably increased the consistency of REG planning provisions across regional policy statements or regional or district plans

    - the NPS-REG alone did not appear to have had a significant impact on the way decisions on resource consents are made

- the full impact of the NPS-REG on planning and consenting for REG is yet to be seen as:
    - at the time of the evaluation, not all plans were yet required to give effect to the NPS-REG
    - growth in electricity demand had been flat since 2007 and there had been little activity in obtaining resource consents for new major electricity generation projects since 2013, meaning that the NPS-REG had not been widely tested through the consenting process.

26. Consequently the NPS-REG could potentially have more impact on RMA decision making when there is more pressure to increase electricity supply in New Zealand. The NPS-REG requires the Minister for the Environment to collaborate with local authorities and relevant government agencies to measure progress towards the Government's national REG target.

Challenges identified by stakeholders with the NPS-REG

27. The evaluation of the NPS-REG sought feedback on the effectiveness of the NPS-REG from local authorities and electricity generators who identified challenges in implementing the NPS. Submissions to the Productivity Commission's draft Low Emissions Economy 2018 report also identified a similar range of challenges with the NPS-REG, including inconsistency in REG planning provisions (both between and within regions) and perceived difficulties in resolving the interaction between the NPS-REG and other national direction instruments. Generators suggested a range of possible improvements, including the development of a NES specific to REG activities.
28. During the development and engagement on the proposed NPS-REG many submitters raised the need to support councils to implement the NPS-REG by providing consistent provisions for REG through a supporting instrument such as a NES. In 2010, the Board of Inquiry into the Proposed NPS-REG recommended that a NES to complement the provisions of the NPS be considered by the Minister for the Environment, however this was not pursued. Th s may have raised expectations of stakeholders that such an instrument would be orthcoming.
29. While there is a lack of industry consensus on the appropriateness of a NES specific to REG activities, some wind generators have suggested that a NES should be developed to prescribe standards for noise and shadow flicker from wind turbines. They consider that introducing a NES which provides specific noise parameters for a permitted activity would pre-empt arguments about wind farm noise, as long as the permitted NES standards were complied with. This could go some way to improving certainty for investment in wind farms. This view is reflected in Blueskin's email to you.
30. National planning standards might offer another mechanism for providing direction to local authorities to support consistency and clarity about enabling provisions for renewable energy in the future.

A NES would likely address some but not all potential barriers to small-scale wind generation

31. Notwithstanding feedback from stakeholders, a NES would be unable to resolve other perceived barriers to wind generation. A NES cannot permit activities which have significant environmental effects, and councils still have to weigh up the provisions of other national direction instruments and the matters in Part 2 of the RMA.
32. It is also important to note that national direction tools can only influence planning and consenting decisions, and the remainder of the decisions to construct electricity infrastructure are market driven. It is likely that a recent relative lack of new renewable energy generation activity is due more to market conditions than inconsistencies across

council planning provisions, or deficiencies in current national direction. The ability of planning tools to support market uptake will always be limited.

We do not recommend developing a NES on small-scale wind at this time

33. s 9(2)(f)(iv) [redacted]

34. The Interim Climate Change Committee (ICCC) will be delivering evidence and analysis on the likely options, costs and practicality of how New Zealand can move toward 100 percent low emission electricity by 2035 including technological and systemic changes in electricity supply and changes in electricity demand.

35. Officials are preparing to provide advice on the results and recommendations of the ICCC and in the longer term, the Climate Change Commission. Part of this response will include policy options to facilitate higher levels of renewable electricity.

36. Our preliminary view is that a NES is not a priority for national direction, nor necessarily the most effective tool to enable the uptake of wind generation given the market factors at play.

Consultation and Collaboration

37. The Ministry for Business, Innovation and Employment was consulted on this briefing s 9(2)(g)(i), s 9(2)(ba)(i) [redacted]

Risks and mitigations

38. There are no specific risks or mitigations to be considered at this time.

Legal issues

39. There are no specific legal issues raised by the content of this briefing.

Financial, regulatory and legislative implications

40. There are no immediate financial, regulatory or legislative implications in this advice. A fuller assessment of these impacts would be considered should further analysis on a NES for small-scale wind generation be requested.

Next steps

41. We suggest that the role of resource management instruments to support REG should be considered alongside other market or regulatory mechanisms to ensure the most effective mechanisms for supporting the transition towards a low-carbon economy and to promote the use of renewable energy. We will keep you updated as work is developed to prepare and respond to the Interim Climate Change Committee's recommendations on the likely options, costs and practicality of how New Zealand can move toward 100 percent low emission electricity by 2035.

Appendix 1: National direction tools under the RMA

National policy statements (NPS)

1. A NPS prescribes objectives and policies on matters of national significance, and may include more specific direction on how these are to be given effect to in local planning documents (eg, by stating methods or requirements that apply).
2. A NPS can be developed using either a Board of Inquiry process (eg, NPS REG) or an alternative process determined by the Minister for the Environment (s46A). Development time for a NPS varies significantly based on the nature of the content and the desired level of direction (eg, the NPS Urban Development Capacity took approximately 18 months, compared to the NPS REG which took 3 years).
3. A NPS must be given effect to in council plans. Plans must be amended within timeframes specified in a NPS, or as soon as practicable if no timeframes are specified. Councils, boards of inquiry, special tribunals and the Environment Court must "have regard" to a NPS when making decisions on resource consent applications.

Strengths	Weaknesses
• Have a broad scope • Can be sector specific (eg, renewable electricity generation) or resource specific (eg, freshwater management) • Can provide both national level direction and flexibility for decision makers – recognising local variation • Can direct a local authority to amend a plan without using the Schedule 1 process	• Does not set rules (but may include constraints and limits) • Uncertainty in the way councils interpret and incorporate into plans may not provide adequate national consistency • Implementation costs can be high due to Schedule 1 process requirements (note the new Streamlined Planning Process may help to reduce these costs) • Take a long time to effect change on the ground
Best for high level direction on specific issues (eg, freshwater management). Note: Prescriptiveness of wording changes the level of discretion councils have when implementing the NPS	

Current NPS and scope
NPS on Urban Development Capacity 2016 *Promotes the provision of development capacity for both housing and business land, with the aim of ensuring that planning decisions enable the supply of housing needing to meet demand.*
NPS for Freshwater Management 2014 (amended 2017) *Directs regional councils, in consultation with their communities, to set objectives for the state of freshwater bodies in their regions and to set limits on resource use to meet these objectives.*
NPS for Renewable Electricity Generation 2011 *Provides statutory guidance on the benefits of renewable electricity generation and to promote a consistent approach to decision making.*
NZ Coastal Policy Statement 2010 *States objectives and policies in relation to coastal environment and is required to be given effect to as set out in the RMA.*
NPS on Electricity Transmission 2008 *Facilitate the operation and establishment of electricity transmission activities, whilst managing adverse effects.*

National environmental standards (NES)

4. NES are regulations that set specific rules – they can prescribe technical and non-technical standards, methods or other requirements such as methods of reporting to the public.
5. A NES can set standards for the use of land, subdivision of land, use of the coastal marine area, the use of beds of lakes and rivers, water, or discharge of contaminants as well as noise or standards, methods or requirements for monitoring. A NES can prohibit, allow or restrict activities to matters specified in the NES.
6. Councils enforce observance of a NES. A NES can allow councils to impose stricter or more lenient standards in certain circumstances.
7. The process for developing a NES is the same as a NPS. A NES and NPS may be developed in parallel to provide both the policy framework and specific rules (eg, NPS and NES for electricity transmission).

Strengths	Weaknesses
• Sets nationally consistent standards • Clarity and certainty • Can support greater national consistency than NPS • Can be used to support implementation of NPS • Immediate effect • Plan changes generally only required to remove conflicts or duplicates with the NES (schedule 1 process not required)	• Time-consuming and costly to develop • Stand-alone regulation which does not include objectives and policies • Can be a blunt instrument • Can be complex to implement if leniency and stringency provisions of the Act are used
Best for setting standards, methods or requirements, and ensuring a nationally consistent approach (eg, setting national planning controls and thresholds)	

Current NES and scope
NES on Plantation Forestry 2017 *Nationally consistent rules to manage plantation forestry activities.*
NES for Telecommunication Facilities 2016 (amended) *Nationally consistent rules to manage the deployment of telecommunication infrastructure.*
NES for Contaminants in Soil 2011 *Nationally consistent set of planning controls and soil contaminant values to ensure land contamination is identified, assessed and made safe for human use before being developed.*
NES for Electricity Transmission Activities 2009 *Sets out a national framework for regulating ET activities on existing ET lines.*
NES for Sources of Human Drinking Water 2007 *Sets requirements on specified planning and consenting processes to help reduce contamination risks for sources of human drinking water.*
NES for Air Quality 2004 (amended 2011) *Sets a minimum level of health protection for New Zealanders.*

Section 360 regulations

8. Section 360 regulations tend to cover more administrative functions and section 360 lists the specific matters that regulations can be developed for. They generally deal with matters of detail or implementation or matters of a technical nature. For example, the

Resource Management (Measurement and Reporting of Water Takes) Regulations (2010) determine the requirements for the measuring and reporting of water takes more than 5 litres per second.

9. Section 360 regulations can require standardised monitoring by councils, exclusion of stock from waterways and removing or prohibiting rules that duplicate, overlap with or deal with subject matter that is included in other legislation (besides any rules relating to genetically modified crops).

Strengths	Weaknesses
• Immediate effect • Removes any potential for inconsistency • Straightforward as are usually single issue or stand-alone • Can apply to existing consents	• Limited in scope based on the current list of matters in s360
Best for setting administrative requirements (eg, fee setting and notices, recording)	

Current s360 regulations and scope
Pest Control Regulation 2017 *Simplifying the regulatory regime by removing duplication between RMA and other legislation for certain toxins.*
Measurement and Reporting of Water Takes Regulations 2010 *Consistent measuring and reporting of actual water taken at national, regional and catchment levels.*
Marine Pollution Regulations 1998 (amended 2002 and 2011) *Control dumping and discharges from ships and off-store installations in coastal marine area.*
Exemption to Discharging Contaminants Regulations 1996 *Enables a biological insecticide to be discharged.*

National Planning Standards (Standards)

10. The purpose of the Standards is to improve consistency across district, regional and unitary plans. At a minimum, the first set of Standards must cover structure), definitions and requirements for electronic functionality and accessibility of plans and policy statements.

11. Standards can require councils to include specific provisions in plans or policy statements (mandatory directions), or allow councils to choose from a suite of provisions to suit their local circumstances (discretionary directions).

12. The first set of Standards is required to be approved by notice in the Gazette by April 2019. Local authorities must ensure plans are consistent with the Standards. RMA timeframes require discretionary directions in the first set of Standards to be implemented within five years of gazettal, and mandatory directions within a year.

Strengths	Weaknesses
• Plans and policy statements easier to develop, comply with and understand • Could be used to implement national direction in a timely and efficient manner	• Take a long time to effect change on the ground
Best for improving consistency across plans and policy statements	

Examples of non-statutory tools used to guide decision making

13. Non-statutory tools can be used to guide decision making and communicate ideas of vision or direction, while supporting a devolved resource management system and

allowing for discretion at the local level. These tools can stand alone or be incorporated in a policy package to complement statutory interventions.

Economic instruments

14. Economic instruments use government spending and taxing powers to shape activity beyond government. For example, through taxes, concessions, grants, loans, subsidies, vouchers or transfer payments.

15. The RMA enables the consideration and investigation of economic instruments in achieving the purpose of the Act as a function of the Minister for the Environment (s24(h)). The Minister may also have regard to economic instruments as a way to implement the Act, when deciding whether to prepare a national policy statement.

Funds

16. Offering financial assistance to non-government organisations and business to undertake certain projects is an approach that has already been used to advance work on environmental issues, such as through the Waste Minimisation Fund and the Freshwater Clean Up Fund.

Strengths	Weaknesses
• Leverage resources and capability outside government • Support a fledgling industry or practice • Can initiate economic development or change to boost performance	• Administratively resource intensive • Potential for abuse – risk of perverse behaviours to gain benefit • Recipients become reliant on funds
Best for when outcomes can be better delivered by non-government organisations/ businesses	

Guidance, guidelines and best practice

17. Information can assist councils and resource users in the implementation of the RMA (eg, providing examples of regional rules to give effect to NPS policies). Information can include very technical and specific advice drawn from best practice.

18. Examples of guidance include the Quality Planning guidance notes, the everyday guide to the RMA, and the forthcoming compliance, monitoring and enforcement guidelines.

Strengths	Weaknesses
• Effective complement to regulatory measures • Can promote achievements of peers and create champions • Flexibility • Guidance can be tested and, if necessary, incorporated into regulation later • Can include good practice approaches that are not specific enough for regulation	• Non-binding, therefore effectiveness is dependent on uptake • Funding constraints and different priorities mean implementation could be inconsistent across the country
Best for giving guidance on standards, methods or requirements where implementing agencies are already committed to dealing with the problem	

Government statements and strategies

19. Government strategies can guide decision making and communicate ideas of vision or direction. They can establish a framework for action and create greater stakeholder buy-in through providing transparency around the government's objectives and rationale for action on a given topic.

20. Examples include the Biodiversity Strategy, the New Zealand Energy Strategy and the Minister of Transport's Government Policy Statement on Land Transport.

Strengths	Weaknesses
• Clarity on direction and priorities of government and the expectations for stakeholders • Guide and inform future decisions	• Usually non-binding, therefore its effectiveness is dependent on the uptake by organisations
Best for clearly documented high level direction on specific issues	

Examples of existing non-statutory tools:

Tool
Waste Minimisation Fund *Provides funding to incentivise waste minimisation activity.*
Guidance on Preparing for Climate Change 2008 *Assisting local government decision making on climate change preparation.*
Biodiversity Strategy 2000 *Establishes a framework for action to conserve, sustainably use and manage biodiversity.*
Government Policy Statement on Land Transport *Sets out the government's priorities for expenditure from the National Land Transport Fund over the next 10 years.*
Good Practice Guides for Managing Air Quality *A series of best practice guidance to help councils meet their obligations under the NES Air Quality*
Contaminated Land Management Guidelines *A series of guidelines for assessing and managing contaminated land*