

# **Environment Network Manawatu Policy and Procedures for Advocacy and Submissions**

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## **Policy Rationale**

Environment Network Manawatu's constitutional purposes include the following:

- 2.2 Advocate for ecological sustainability and matters of agreed environmental significance.

This document sets out the policies and procedures that guide how Environment Network Manawatu (ENM) will meet its constitutional purpose to act as an advocate. It also indicates where ENM member groups have given us a mandate to represent them. The document includes:

- ENM policy on making representative submissions;
- policy and procedures for consulting members on representative submissions;
- policy and procedures for supporting member groups who wish to make their own submissions;
- policy on informal consultation to territorial authorities;
- policy on informal consultation to government, political parties, and political candidates;
- policy and procedures for media advocacy and other advocacy to the public.

The substance of these policies and procedures were most recently discussed with member group representatives at ENM's May 2014 Special General Meeting.

## **Policy on Making Representative Submissions**

In keeping with its purpose to advocate, Environment Network Manawatu will make submissions that represent member groups, as capacity permits, in the following contexts:

- the annual plans and budgets of Horizons Regional Council and the local councils in our catchment area;
- policy statements, including proposed national policy statements, that have an impact on the local environment and the local environmental sector;
- plans that are being consulted outside of formal notified processes, where invited to do so (e.g. publicly notified informal pre-consultation on PNCC plan changes).

ENM will not submit on the following:

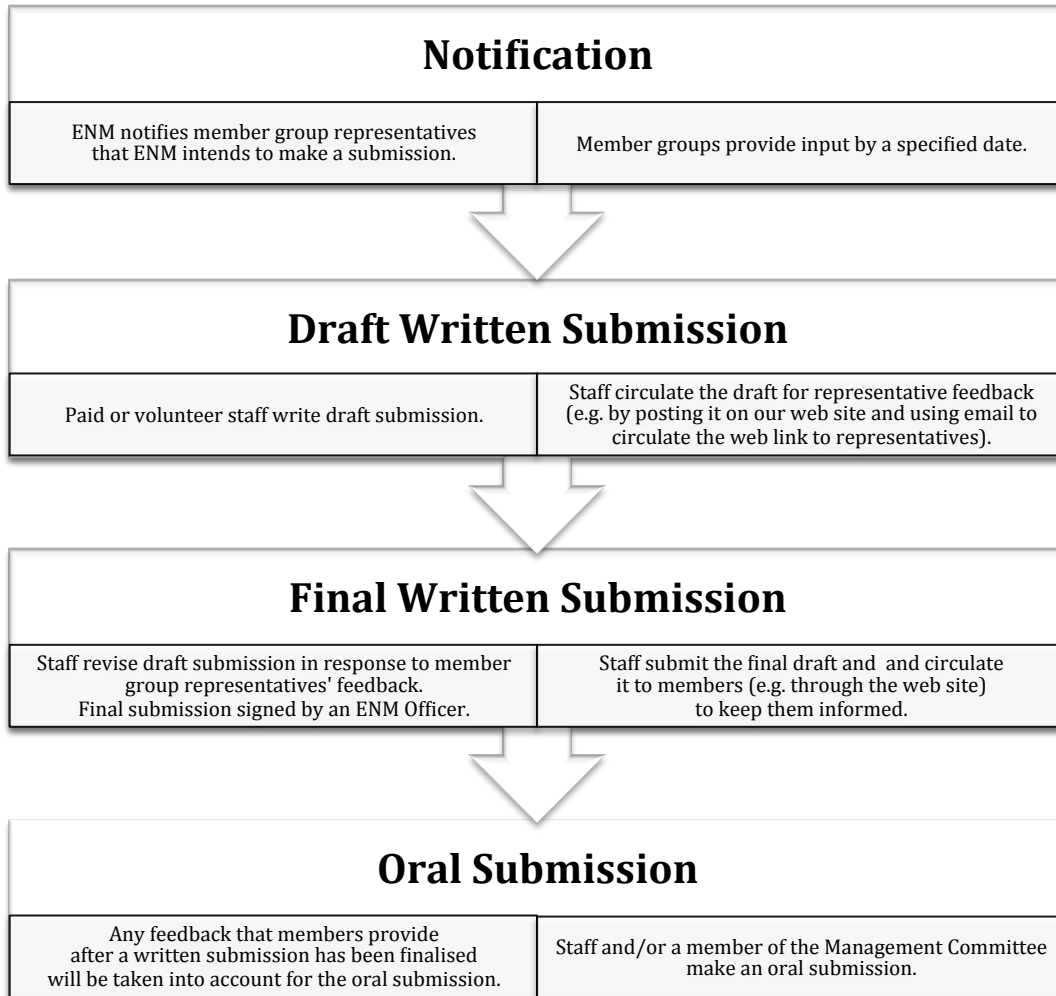
- resource consent applications;
- formally notified district and regional plans.

## **Policy and Procedures for Consulting Members on Representative Submissions**

ENM will endeavour to give member group representatives multiple opportunities to provide input into submissions made on behalf of the network.

An ideal member consultation procedure is indicated below (Figure 1).

From time to time there are likely to be limits on the time available to prepare a submission, and/or on the capacity of paid and volunteer staff, preventing the full implementation of the ideal consultation procedure. When this is the case, ENM will shorten and/or adapt the procedure presented in Figure 1, however required, to make sure a submission is made, as has been requested by our member group representatives.



**Figure 1.** Ideal procedures for a formal ENM submission to a local or regional council annual plan, to an informal pre-consultation on a council plan, or to a consultation on a proposed policy statement.

Where points made in a draft submission prove controversial within our network of member groups, ENM will simply remove those points rather than mediate the controversy within the time available to make a submission. If a very small minority of member group representatives dissent on a point that many representatives actively support, ENM will take into account the sources of the support and dissent and whether the representatives involved are from a group that works actively on the topic to which the particular point refers. For example, comments from a representative of a cycling group will be given extra weight on points involving the infrastructure required for safe cycling. Member groups are expected to communicate to ENM regarding submissions through their member group representatives.

If a member group representative raises a point for consideration when ENM no longer has sufficient time to consult with all member group representatives, ENM will normally not be

able to include that point except at the discretion of the staff preparing the submission. Where staff judge that the new point would have broad-based support within the network they are encouraged to include it.

## **Policy and Procedures for Supporting Member Groups Who Wish to Make their Own Submissions**

Environment Network Manawatu will additionally provide support to member groups who wish to make submissions in their own name, including submissions under the RMA Act. The following are examples of the support ENM will provide:

- notice to members of publicly notified submission opportunities (including resource consent applications);
- circulation within our network and/or through our web site of information and draft submissions provided by member groups;
- circulation within our network and/or through our web site of information provided by ENM staff or volunteers on such submissions.

## **Policy on Informal Consultation with Territorial Authorities**

Environment Network Manawatu recognises the importance of relationship-building, informal consultation, and pre-consultation with territorial authorities, including local and regional councils and iwi and hapū.

It is our aim to be in close communication with councillors and council officers on an ongoing basis, not just when submissions are due. Similarly, we will actively seek opportunities to build ongoing relationships with iwi and hapū that are over and above the particular consultation requirements of individual projects. We recognise that there may be limits to our capacity or opportunities to develop this type of relationship at any given time, and we will work gradually to build capacity in this area.

ENM will also support our member groups, as capacity permits, in their own endeavours at the relationship-building, informal consultation, and pre-consultation.

## **Policy on Informal Consultation to Government, Political Parties, and Political Candidates**

Within the parameters set by our Policy on Making Representative Submissions (above), ENM can take a role in expressing views to central government and political parties regarding issues or proposed policies and legislation that will have regional environmental impact.

ENM is non-partisan. When ENM communicates with political parties or candidates, and when ENM supports pre-election forums of any sort, it will do so in a way that provides equal opportunity to all parties and candidates. ENM has no obligation to ensure that all parties and candidates make use of these opportunities.

## **Policy and Procedures for Media Advocacy and Other Advocacy to the Public**

From time to time ENM advocates for the environment and the community environment sector through additional channels, including the media and speaking at public events.

At times this type of advocacy will require a prompt response that precludes consultation with member group representatives. This is especially likely to be true when the media initiates requests for views or information. This type of advocacy is important to ENM's role and purposes, and ENM will represent our members in these circumstances on a general level that suits the principles within our constitution.

ENM staff are often more available than the Co-Chairpersons, and they may serve as media spokespersons for ENM. It is preferred that they respond directly to media queries rather than referring those queries to member groups. When staff require further information before responding, they can go to the relevant group themselves before providing media comment.

It is generally advisable that staff routinely delay answering media queries until they have time to give the question thought, and/or discuss the queries with others, and/or collect additional information.

The ENM Management Committee most recently reviewed this policy on 16 November 2015. The substance of the policy was consulted with members in a minuted discussion at ENM's 12 May 2014 SGM. A signed copy of the policy is available in the ENM Office.