



New Zealand Climate Change Project
Te Hōtaka Rerekētanga Āhuarangi o Aotearoa

CONSULTATION REPORT

A report back on the Government's second round of consultation on its preferred policy package for climate change

May 2002

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Overview

In May 2002, the New Zealand Climate Change Project undertook a second round of consultation on its preferred policy package (developed using feedback on policy options from the first round of consultation in October-December 2001).

The Climate Change Project sent out several thousand consultation packs asking whether or not New Zealanders agreed with the Government's preferred policy approach, if they thought the package was balanced between addressing climate change and keeping the New Zealand economy strong, and whether they thought the policies in the package treated all parties in the New Zealand economy fairly or not.

We also asked them if they supported or opposed the proposed policy treatment for different sectors and/or groupings.

In addition, meetings were held throughout New Zealand to discuss the preferred policy package. This included hui, national meetings and more specific meetings for local government, special interest, business, agricultural and forestry groups.

On balance, stakeholders appeared to understand and generally accept the policy direction. Many said they agreed or generally agreed with the overall approach of the policy package. Where they disagreed, or generally disagreed, this reflected views on both sides of the debate.

Environmental and community groups were concerned that the policy relied too much on sinks, provided too many concessions to industry and did not adequately set New Zealand on the appropriate path to lower emissions.

Some businesses, farming groups and farm foresters were still concerned about ratification in advance of some of New Zealand's major trading partners (e.g. Australia and the USA) and also about policy issues - the emissions charge, sinks policy and potential future changes in government policy (e.g. second commitment period charges on non-CO₂ gases).

A common theme across stakeholders was the need for the policy to be balanced and fair, and a concern that, so far, there is not enough known about key details (e.g. revenue recycling) for them to fully judge the merits of the policy.

There was also an understanding of the need to do something about climate change but no real consensus on how and over what time frame to respond.

The Government took these views and concerns into consideration before confirming its final policy package on 17 October 2002. The policies will enable New Zealand to meet its greenhouse gas emission reduction targets under the Kyoto Protocol, which it will ratify by the end of the year.

Consultation meetings

Forty-nine meetings were held in main centres throughout New Zealand to discuss the preferred policy package. This included three national meetings in Auckland, Wellington and Christchurch, 13 meetings for local government, 13 meetings for special interest and business groups, 11 meetings for agricultural and forestry groups, and eight regional and one national hui. Following is a summary of the views and concerns that arose at these meetings.

Foundation policies

- Foundation policies were seen as very important and needing proper funding. However concerns were expressed about the Government's commitment to adequately support these programmes.
- There was strong demand for climate friendly transport policies. Transport was seen as the biggest growing problem for New Zealand, yet the New Zealand Transport Strategy is perceived as not as advanced as other strategies in addressing emissions.
- Concern was expressed at the lack of policy and planning on public awareness. Many people saw the need for a lot of work to be carried out on informing/advising/educating New Zealanders
- There was also concern at the lack of an overarching framework/strategy for energy especially given the future of Maui.

Forest Sinks

- While the view that sink credits should be devolved to forest owners/managers was common, it was by no means universal, with a minority of forest owners considering that the best option for managing the forest sink credits and liabilities was Government retention.
- There was strong agreement that incentives for sinks should be used for establishing permanent protection forests.
- There were concerns by some farm foresters that they will be unable to trade their forest carbon sinks against any costs of research to reduce their livestock emissions.
- Broad support was expressed for initiatives generating sink credits and reducing sink liabilities that also generically benefited the entire forestry sector, such as additional market development initiatives and research.
- General support amongst Maori was conveyed for the Crown entering joint ventures with landowners to create new plantation forest sinks.
- There was concern from some that the policy did not recognise/give credits to investors who had already developed forest sinks.
- Concern was expressed over the limited nature of the deforestation cap, beyond which private forest owners would potentially wear the carbon liability resulting from forest conversion to other land uses.

Emissions charge

- There was demand for more information on how the charge will be applied.
- Concern was expressed about the fairness of the charge. For example, the competitiveness-at-risk group and farmers would not have to pay under the policy, but there would be sizeable costs for "general energy" coal users (especially in the South Island).
- There were particular concerns from those small to medium sized businesses with large energy costs and few obvious options for switching to alternative sources.

- A reasonable level of comfort was expressed with the charge as long as revenue was used to reduce emissions and address unfair effects of the charge on business.
- There was concern that the charge would do nothing to encourage changes in behaviour, especially in a key sector like transport.

Revenue recycling

- A significant number of people expressed the need to understand how revenue would be recycled and what effect this would have before final judgement on the policy package was made.
- There was suspicion that revenue would not be returned to the economy and that it would “disappear into the consolidated fund”.
- There was strong demand for revenue to be used for mitigation, adaptation and other climate change related activities, or to help businesses and people affected by the charge. A strong “regional equity” flavour to this issue arose, especially from the South Island where concerns were expressed about having to pay proportionately greater costs from the use of coal and electricity when a high proportion of New Zealand’s non-CO₂ emitting hydroelectric power is generated there.

Competitiveness-at-risk group and Negotiated Greenhouse Agreements (NGAs)

- A number of people/groups thought it was not fair that only big companies/high emitters should get NGAs. They stated that the assumption that small business can simply pass on costs is wrong - that they export too and would not be able to compete against imports from non-Kyoto countries.
- There was a significant amount of interest in who would be eligible for NGAs and how easy it would be to get an NGA.
- Concern was expressed about how “international best practice” would be applied and its relevance to New Zealand’s national circumstances.

Projects

- Mixed interest in Projects was shown, but opinion was largely supportive.
- There was interest in the funding that would be available and how it would work.
- Demand was expressed by some for regional allocation for Project funding.

Agriculture

The majority of farmers consulted were opposed to New Zealand’s ratification of the Kyoto Protocol at this time. However, there appeared a general acceptance that climate change was a real issue and that some kind of action should be taken. Concerns expressed were that:

- New Zealand’s competitive position might be jeopardised by imposing additional costs (particularly to fund mitigation research and increased energy costs) on the agricultural sector.
- The Protocol would not effectively address climate change.
- New Zealand should not be ratifying the Kyoto Protocol before its major trading partners.
- Measurement difficulties make it impossible to accurately determine the effect of agriculture on the climate.
- Certain sectors of the horticultural industry would be seriously affected by cost increases (for example, coal for glasshouse heating).
- Those who have undertaken forestry Projects (for which they are not rewarded) should have to pay for energy emissions.

Maori issues

- Maori want to be included in policy at all stages of development.
- Some Maori proposed that the Government should defer its decision to ratify.
- There was concern over lack of discussion from Government on issues in relation to Article 2 of the Treaty.
- Maori, as large owners of rural land, were pleased with the Government's decision not to impose charges on agricultural methane and nitrous oxide emissions.
- Concern was expressed over the limit (or cap) the Crown was proposing on the extent to which it would cover the deforestation liability due to forest conversion to other land uses.
- There was some recognition of the need for action reflecting Maori kaitiaki role.

Local Government partnership

- There was cautious acceptance of partnership between local and central government. Acceptance was dependent on the Government not simply devolving responsibility, and providing adequate funding.

RMA amendment

- There was majority agreement with the proposed amendment to remove greenhouse gas emissions from RMA control, but there was still some opposition from a few councils.
- Need was expressed for further consultation regarding the details of the amendment.
- There were some general messages that more guidance or direction may be needed from central government about planning for sustainable urban form, or sustainable development generally.
- Some submitters sought amendments to the RMA to prioritise renewable energy.

Written submissions

During its second round of consultation in May 2002, the New Zealand Climate Change Project received 1120 written submissions from a range of organisations and individuals. Of these submissions, 866 were sent in on a Greenpeace initiated response form. In an endeavour to fairly represent submissions received, we have portrayed the views of those initiated by Greenpeace separately from the rest of the submissions.

Submissions analysis¹

254 submissions from individuals and organisations (excluding Greenpeace initiated ones) responded to the questions asked by the Government in its Preferred Policy Package discussion document.

A large number of themes came out of the analysis of these submissions. We have recorded the themes that arose from each question in the preferred policy package discussion document, as well as the percentage of people who cited each theme (see Appendix 3). For Question 4, we have also separated the themes into categories with the percentage of people who made a response in each category. In addition, there was a high proportion of comments that didn't relate to the questions asked in the preferred policy package discussion document. We have included this feedback in a "Comments" section following the analysis of Question 4.

Question 1: Do you agree with the Government's preferred policy approach?

Of the 254 submissions:

- 28% agreed or generally agreed
- 30.3% disagreed or generally disagreed
- 12.6% gave an unclear answer
- 29.1% didn't respond

Please see Appendix 3 for a full list of themes for this question with the percentage/number of submissions that were cited against each one.

Question 2: Does the preferred policy package achieve the right balance between addressing climate change and keeping the NZ economy as strong as possible?

Of the 254 submissions:

- 13.8% agreed or generally agreed
- 25.6% disagreed or generally disagreed
- 13.4% gave an unclear answer
- 47.2% didn't respond

Please see Appendix 3 for a full list of themes for this question with the percentage/number of submissions that were cited against each one.

¹ Does not include submissions initiated by a Greenpeace response form (see box on page 11).

Question 3: Do the policies in the package treat all parties in the NZ economy fairly?

Of the 254 submissions:

- 10.6% agreed or generally agreed
- 23.2% disagreed or generally disagreed
- 16.5% gave an unclear answer
- 49.6% didn't respond

Please see Appendix 3 for a full list of themes for this question with the percentage/number of submissions that were cited against each one.

Question 4: Do you support or oppose the proposed policy treatment outlined in the preferred policy for the sectors and/or groupings of which you are a part?

Many issues arose from this section and we have put the main themes in the following categories. Please note: percentages relate to the total number of responses in each category, not to the overall number of submissions.

Agricultural research

Opinion was mixed over who should provide funding for research into on-farm methane emission reduction.

- 26.7% stated they agreed with the government/industry joint approach
- 15.5% believed farmers should pay for research costs
- 13.3% supported the need for research to reduce emissions in the agricultural sector
- 13.3% thought it was unfair to consider emissions separate from sequestration
- 8.9% thought the Government should provide most of the funding.

CAR/NGAs

There was some support for Negotiated Greenhouse Agreements (NGAs) and the competitiveness-at-risk (CAR) criteria, but overall there were more concerns.

- 15.3% said assessment of CAR needs to be rigorous and transparent
- 14.8% were concerned that NGAs will not be open to all NZ businesses
- 13.4% stated they supported NGAs
- 9% were concerned over how 'best practice' would be determined
- 7.2% said there should be credit for actions since 1990
- 6.7% believed policy details in this area were lacking and needed more development
- 4.8% were concerned about the size threshold for NGAs
- 4.8% oppose NGAs which allow polluters to avoid a carbon charge.

Carbon charge

A substantial number of submitters did not support or had concerns about a carbon charge. Many supported a carbon charge or thought there should not be a delay in imposing this charge.

- 14.2% were concerned at the effect of a carbon charge on international competitiveness
- 12.2% did not support a delay in imposing a carbon charge
- 11.8% thought the charge wasn't high enough to change behaviours

- 8.1% did not support a carbon charge
- 5.7% said a carbon charge would be ineffective if there were no energy alternatives
- 5.3% supported a carbon charge

Forestry

Generally, comments on the proposed policy for forestry were more about further requirements, rather than stating support or opposition.

- 62.7% of submissions said there should be incentives to encourage the planting of permanent forest sinks
- 19.4% thought forest growers should be recognised/rewarded for their contribution to New Zealand's forest sinks since 1990.

Partnership

Most people supported local/central partnership, although a significant number agreed but with certain requirements.

- 49% of submissions supported partnership between local and central government on climate change issues and activities
- 37.2% stated adequate resources would be needed for such a partnership.

Projects

There was a significant amount of support for Projects, but also a high level of uncertainty.

- 29% stated that Projects were a sensible approach
- 16.5% said the evaluation and assessment procedure for Projects should be transparent
- 11.3% thought further work on Projects was needed
- 9.3% said everyone should be able to access Projects
- 8.2% believed incentives for Projects should be both monetary and emissions units.

Revenue

Over half the comments in this category were that revenue from a carbon charge should be used to reduce greenhouse gas emissions or encourage behaviour changes to do this. A small percentage stated it should be used in other ways.

- 35.5% stated revenue from a carbon charge should be used to reduce greenhouse gas emissions
- 28.9% wanted more detail on how revenue would be spent
- 22.2% thought revenue should be used to encourage behavioural changes to reduce greenhouse gas emissions
- 6.7% said revenue should not be recycled into general taxes
- 6.7% stated revenue should be used to reduce other taxes.

Resource Management Act

A high proportion of people stated the RMA should be amended and a significant proportion said this should happen immediately.

- 32.7% believed that the RMA should be amended
- 16.3% stated the RMA should be amended immediately
- 12.5% said National Policy Statements should be used instead
- 7.7% thought urban form should be retained in the RMA
- 5.8% stated the control of greenhouse gas emissions should be removed from the RMA.

Sink credits

There was mixed response over who should own sink credits.

- 38.5% said the Government should devolve New Zealand's sink credits to the forestry sector
- 23% were in support of the Government retaining sink credits
- 15.4% believed the retention of credits by the Government disincentivised the planting of trees to absorb carbon
- 9% said that sink credits should not be used to offset emissions in other sectors
- 7.7% stated that the retention of sink credits by the Government will impact negatively on the international competitiveness of the sector.

Transport

All comments on transport in this section related to the theme that there needed to be more positive incentives to encourage less use of vehicles.

Comments

There were a wide-ranging number of comments about ratification, public awareness and other climate change issues that did not fit into the four questions as asked in the preferred policy package discussion document. We have included these comments in the following section.

There were many themes that arose in this section and we have discussed the more prevalent ones below. All comments are included in Appendix 3 on page 14 of this document.

- the most common theme in this section was that clear and unbiased information about climate change issues and policy was essential for nationwide public understanding (81.5% of submissions which commented on public awareness/education stated this)
- the topic of New Zealand ratifying the Kyoto Protocol was also prevalent. Of the submitters who commented on ratification:
 - 24.3% stated New Zealand should ratify
 - 24.3% believed New Zealand should not ratify the Protocol
 - 32.4% thought New Zealand shouldn't ratify the Protocol before its major trading partners
 - 18.9% said New Zealand should not rush into ratification.
- another common theme was the desire for further involvement in policy development.

Greenpeace initiated submissions

866 submissions were sent in on a Greenpeace initiated response form.

Responses

Questions on the Greenpeace initiated response form were worded differently from the ones in the preferred policy package discussion document, as follows:

Question 1: Should the New Zealand Government ratify the Kyoto Protocol?

Answer: yes.

Question 2: Does the New Zealand Government's preferred policy on climate change meet the UNFCCC objective of 'avoiding dangerous levels of climate change'?

Answer: no.

Question 3: Does the preferred policy package achieve the right balance between addressing climate change and keeping the New Zealand economy as strong as possible?

Answer: no.

Question 4: Do you believe the Government is doing enough through its preferred policy package to support the development of a new renewable energy industry in New Zealand?

Answer: no.

Themes

There were a number of clear cut themes in the Greenpeace initiated submissions.

These submitters thought New Zealand should ratify the Kyoto Protocol and supported a charge on emissions. They also believed:

- the preferred policies, if put in place, would not sufficiently reduce greenhouse gas emissions
- energy efficiency targets under the National Energy Efficiency and Conservation Strategy were not tough enough
- policies gave too many concessions to industry
- the delay in response (i.e. in 2008, at the start of the first Commitment Period) would cause future costs to the environment and the economy
- there was insufficient support of renewable energy
- there were risks that a future government would not implement an emissions charge.

In addition, these submitters thought that more focus on the environment was needed.

Appendix 3: Themes and percentage of responses

Key

Ag: agriculture
 CAR: competitiveness-at-risk
 CC: carbon charge
 CCP: cities for climate protection programme
 CDM: clean development mechanism
 DET: domestic emissions trading
 Educ: education
 F'try: forestry
 GHG: greenhouse gas
 KP: Kyoto Protocol
 NEECS: National Energy Efficiency and Conservation Strategy
 NGA: negotiated greenhouse agreement
 PPP: preferred policy package
 RMA: resource management act

NB: Percentage/number of responses to the themes listed below do not include submissions sent on the Greenpeace initiated response form.

Question 1

Theme	No of Responses	%
Agree with the principles behind the PPP	10	2.54%
Applaud Govt action to reduce GHG emissions	12	3.05%
Balance and clarity needed on central/local govt roles	3	0.76%
Broad based, long term and realistic, recognises uncertainties	10	2.54%
Concern about damage to international competitiveness	15	3.81%
Concern about distribution effects (regions, small businesses, lower socio-economic groups)	5	1.27%
Concern about effects on the economy (eg investment) and internal market (eg distortion)	4	1.02%
Concessions to industry are unnecessary/unfair	18	4.57%
Damages New Zealand's international competitiveness	16	4.06%
Dependent on other strategies	2	0.51%
Does not put New Zealand on a path to necessary lower future emissions	10	2.54%
Economic effects of policies are unclear	22	5.58%
Environmental effects of policies are unclear	5	1.27%
Global warming is due to a range of factors, not just GHG emissions	1	0.25%
Greater emphasis required on encouraging emission efficient users	1	0.25%
Lack of focus on innovation and technology	1	0.25%
Lack of policy details leave uncertainty	22	5.58%
Lacks vision of achieving a low carbon economy	8	2.03%

Local Government involvement dependent on resourcing	5	1.27%
More early action needed	16	4.06%
More economic analysis needed	13	3.30%
Need to demonstrate financial support for foundation policies	9	2.28%
Needs a more enforceable/regulatory approach	2	0.51%
Needs coordination with other policy areas e.g. tax, electricity and gas reviews	3	0.76%
Needs to demonstrate support and funding for foundation policies	5	1.27%
Over reliance on sinks	17	4.31%
Overall a good policy package	7	1.78%
Policies don't address climate change	6	1.52%
Policies should be fiscally neutral	3	0.76%
Policies will create more bureaucracy	5	1.27%
Policies will not reduce emissions	14	3.55%
Policies will reduce emissions	5	1.27%
PPP comprises vague and insufficiently detailed policies	5	1.27%
PPP does not show impact on reducing emissions	1	0.25%
PPP fails to consider the costs of implementing + achieving emissions reduction	4	1.02%
PPP fails to provide NZ business/industry with the confidence to face an uncertain economic future	3	0.76%
PPP fails to show what impact the proposed policies will have on reducing the effects of climate change	2	0.51%
PPP is unfair in its treatment of individual sectors	6	1.52%
PPP just delays addressing issues to after the first commitment period	6	1.52%
Price measures should be economy wide	3	0.76%
Product of rushed consultation	5	1.27%
Reliance on sinks is at the expense of the forest sector	13	3.30%
Relies too much on voluntary approaches	3	0.76%
Sceptical of the science of climate change	10	2.54%
Support foundation policies as a base	20	5.08%
Support the long term goal of the policy	8	2.03%
Supports categorising of the economy	8	2.03%
Supports transitional and staged approach	4	1.02%
Supports use of shelter mechanisms (eg NGAs)	10	2.54%
Too many concessions to industry	3	0.76%
Too much emphasis on fairness and balance at expense of reducing emissions	5	1.27%
Total	394	

Question 2

Theme	No of Responses	%
Competitiveness concerns not adequately addressed	27	20.77%

Environmental benefit/cost unclear	3	2.31%
Environmental concerns are unfounded	4	3.08%
Good balance	12	9.23%
Has flexibility to address emissions and competitiveness	4	3.08%
More action needed	18	13.85%
More focus on health related issues	4	3.08%
More focus on the environment required	8	6.15%
Need more information and future monitoring to determine if balanced	8	6.15%
Too much cost on industry	8	6.15%
Too much emphasis on competitiveness concerns	8	6.15%
Too much focus on economic issues	14	10.77%
Too much focus on short term concerns rather than long term	5	3.85%
Total	130	

Question 3

Rating	No of Responses	%
Categorisation has not achieved fair outcomes	8	3.46%
Caters to big industry but not small businesses	3	1.30%
Competitiveness concerns on international markets	5	2.16%
Concerns remain about loss of international competitiveness	33	14.29%
Doesn't properly address sectors that don't have much choice	4	1.73%
Fairness achieved through categorisation	18	7.79%
Heavy reliance on forestry sector	9	3.90%
Nationalising sinks is not fair to forest sector	28	12.12%
Need more information and monitoring of outcomes to determine if fair	9	3.90%
Need to ensure fairness across generations	3	1.30%
Need to ensure fairness across regions	15	6.49%
Need to ensure fairness across sectors	32	13.85%
Need to ensure fairness across socio-economic groups	8	3.46%
Not all polluters are paying	12	5.19%
Policies inflict higher costs on agriculture	8	3.46%
Policies may lead to distortionary market outcomes	2	0.87%
PPP doesn't give credit to sectors that have already made good progress	4	1.73%
Regional outcomes not distributed fairly, eg. South Island has less options, higher penalties	9	3.90%
Research levy on agriculture unfair	7	3.03%
Too much cost on industry	6	2.60%
Unfair to General Energy Users	8	3.46%
Total	231	

Question 4

Theme	No of responses
Ag research needs a sound and balanced strategy and a cost/benefit analysis prior to funding	4
Ag research: agree with the Govt/industry joint approach	12
Ag research: funding + prioritising of ag research should be done by one body	3
Ag research: Govt should ensure such research is undertaken	3
Ag research: Govt should provide most of the funding	4
Ag Research: support farmers paying for research into methane reduction	7
Ag: support need for research to reduce emissions in the ag sector	6
Ag: to consider emissions separate from sequestration is unfair	6
Article 3.4: don't support exclusion	2
Article 3.4: support its exclusion	1
Carbon leakage: policies will have no environmental benefit world-wide but will allow carbon leakage	10
CAR/NGAs: all industries whose international competitiveness will decline must be eligible for CAR status	4
CAR/NGAs: assessment of CAR needs to be rigorous and transparent	32
CAR/NGAs: businesses given an NGA will be given preferential treatment over the rest of the economy	4
CAR/NGAs: concern about approach to future commitment periods	8
CAR/NGAs: concern about resourcing and timelines of NGA negotiation	6
CAR/NGAs: concern about size threshold for NGAs	10
CAR/NGAs: concern over determination of best practice	19
CAR/NGAs: concern that NGAs will not be open to all NZ businesses	31
CAR/NGAs: criteria need to address all relevant issues	5
CAR/NGAs: flexibility is needed in the design of NGAs	4
CAR/NGAs: links between NGAs/Projects/trading are unclear	6
CAR/NGAs: need to address industry groupings of small businesses	6
CAR/NGAs: oppose NGAs which allow polluters to avoid a carbon charge	10
CAR/NGAs: policy details are lacking and need more development	14
CAR/NGAs: support NGAs	28
CAR/NGAs: want credit for actions since 1990	15
CAR/NGAs: will there be incentives for early participation	3
CAR/NGAs: industry participation necessary in evaluation process	4
CC: a carbon charge is effective at reducing emissions	1
CC: a carbon charge is ineffective if there are no energy alternatives	14
CC: a carbon charge should be across the entire economy	5
CC: a carbon charge takes away revenue to invest	9
CC: a charge doesn't reduce emissions if businesses/individuals are already efficient	8
CC: a charge may not be able to be passed onto consumers	8
CC: balance between economic impact & incentives for behaviour change is needed	2
CC: concern about cost of this charge on top of ag research levy	2
CC: concern at the effect of carbon charge on lower socio-economic bracket	5
CC: concern at the effect of this charge on international competitiveness	35
CC: concern at the effect of this charge on regional competitiveness	2
CC: demand for energy is inelastic	10
CC: do not support a carbon charge	20

CC: do not support a delay in imposing a carbon charge	30
CC: don't support the cap - should face international price	6
CC: increased fuel/electricity costs will likely result in higher costs for consumers	11
CC: introduces threat of carbon leakage	6
CC: oppose a charge for on-farm fuel/electricity	2
CC: support a carbon charge	13
CC: support delay in imposing a carbon charge	8
CC: support exception of on-farm ag sector from charge	8
CC: support exemption of a charge on methane/nitrous oxide emissions	2
CC: support the price cap	6
CC: the price isn't high enough to change behaviours	29
CC: will negatively impact on future investment in NZ	4
DET: do not support emissions trading	4
DET: supports a DET	8
Ftry: forest growers should be recognised/ rewarded for their contribution	13
Ftry: generic incentives should be provided to the forestry sector	6
Ftry: incentives should encourage permanent forest sinks	42
Ftry: should encourage indigenous forests	4
Ftry: should not encourage indigenous forests	2
Impacts and adaptation: Govt should future proof communities	1
Impacts and adaptation: need more research and monitoring	7
Local Govt role: acknowledge importance but do not support CCP programme	2
Maori: current policy does not address principles of the Treaty of Waitangi	3
NEECS: targets are not tough enough	5
Partnership between local and central Govt will need adequate resourcing	16
Partnership: need guidance and legislation from central Govt	6
Partnership: support partnership with central Govt	21
Projects: CAR firms should be eligible for project support	2
Projects: central to the early intro of technologies/solutions for reducing GHG emissions	2
Projects: concern if adequate funding	4
Projects: everyone should be able to access projects	9
Projects: further work on Projects needed	11
Projects: incentives for Projects should be both monetary and credits	8
Projects: incentives for Projects should be monetary	5
Projects: Projects programme should include renewables	5
Projects: Projects are a sensible approach	28
Projects: should prioritise renewables	7
Projects: the evaluation and assessment procedure should be transparent	16
Research levy on agriculture is not fair	7
Revenue: how is it going to be spent (more detail needed)	13
Revenue: should spend it on encouraging behavioural changes to reduce GHGs	10
Revenue: should be used to reduce emissions	16
Revenue: should not be recycled into general taxes	3
Revenue: should use revenue to reduce other taxes	3
RMA: amend to encourage renewables	5
RMA: amend to remove control of GHGs	6
RMA: amendment needed now	17

RMA: amendment needed to strengthen the RMA	9
RMA: National Policy Statement for guidance on climate change is not needed	5
RMA: should be amended	34
RMA: support development of national guidelines	7
RMA: urban form should be retained in the RMA	8
RMA: use National Policy Statements	13
Sink credits should not be used to offset emissions in other sectors	7
Sink credits shouldn't be used to the benefit of forest sector competitors	2
Sink credits: Govt should devolve them to forestry sector	30
Sink credits: oppose Govt's nationalisation of credits	3
Sink credits: retention disincentivises planting trees to absorb carbon	12
Sink credits: retention will negatively impact the international competitiveness of the sector	6
Sink credits: support retaining of them by Govt	18
Transport: need to be more positive incentives to encourage less car use	16

Comments

Theme	No of comments
Ag policies: concern about these policies in future commitment periods	1
Ag: to consider emissions separate from sequestration is unfair	1
Branding: support concept of "green branding"	1
CAR/NGAs: concern about costs of monitoring and reporting	1
CAR/NGAs: concern about resourcing and timelines of NGA negotiation	1
CAR/NGAs: concern over determination of best practice	1
CAR/NGAs: criteria need to address all relevant issues	1
CAR/NGAs: flexibility is needed in the design of NGAs	1
Consultation: disappointed with process	3
Consultation: lack of available supporting information	1
Consultation: restricted timeframe for response	1
Early Action: there should be recognition for reductions since 1990	3
Economy: adopt steady state economics instead of chasing the mirage of economic growth	1
Further involvement in policy development	27
Impacts and adaptation: greater resources for adaptation needed	1
Impacts and adaptation: more guidance needed for planning in this area	1
Impacts and adaptation: need more info about climate change impacts	1
Impacts and adaptation: need more research and monitoring	1
Impacts and adaptation: policies won't provide enough protection for health or the environment	1
Institutional: support continuation of Climate Change Team	1
KP/PPP: firms should be able to access the flexibility mechanisms of KP	1
KP/PPP: NZ should use flexibility mechanisms of KP to meet target (CDM-JI)	1
KP: economic/environmental/social benefits cannot be substantiated	1
KP: implications of decisions in first CP depend on what details of second CP will be	1
KP: other potential courses of action to address climate change have not been considered	1
KP: support ratification	5
KP: uncertainty about risks of further commitment periods	2

KP: uncertainty over the role of the KP and the impact of future obligations	1
Maori haven't been adequately involved in decision making	1
Maori need resourcing to engage properly in the future	1
NEECS: funding can achieve direct reductions	2
NEECS: like to see greater clarity regarding interaction between NEECS and PPP	4
NEECS: need more information	2
NEECS: remove barriers for renewable energy	4
NEECS: should stand alone in own right	1
NEECS: support renewable energy certificate	1
NEECS: support renewable energy targets	2
NEECS: targets are not tough enough	2
NEECS: targets need incentives attached	1
NEECS: targets need to be legislated	1
NEECS: targets will be difficult to achieve	1
NEECS: will other sectors pay for failure to achieve targets	1
New Zealand should not ratify before our major trading partners	24
New Zealand should not ratify the Kyoto Protocol	18
New Zealand should not rush into ratification of the KP	14
New Zealand should ratify the Kyoto Protocol	18
PPP: inadequate consultation on KP	3
PPP: pleased to see elements of initial submission included in PPP	8
PPP: should promote buying local to reduce emissions	1
Projects: need industry input when developing Projects programme	1
Projects: Projects programme should have separate fund for renewables	1
Pub awareness/educ: clear/unbiased information needed for nationwide public understanding	31
Pub awareness/educ: Govt needs to lead by example	1
Pub awareness/educ: need to target information i.e. renewables for plumbers	2
Pub awareness/educ: needs to be fully funded.	1
Pub awareness/educ: key area local Govt can participate	6
Ratification and policy development should not be treated as separate issues	1
Ratification would be ineffective in reducing temp increases	1
RMA: development of national guidelines as an interim would be useful, if prepared quickly	1
Sceptical of measurement of emissions	2
Sceptical of the science of climate change	1
Sink credits: Govt should devolve them to forestry sector	1
Tourism: positive spin-offs for tourism of native re-vegetation	1
Transport: needs to be more positive incentives to encourage less car use	4
Transport: shipping should not be included in categorisation	1
Transport: strategy does not do enough	2
Understanding of issues needed for public to accept policies	2
Waste: need to change attitude towards waste	1
Waste: sector should not be exempt from charges	2
Waste: should do more in this area	1
Why is 1990 the baseline year?	1

Appendix 4: List of submitters

1	Piers Maclaren	Piers Maclaren & Associates Ltd	Rangiora
2	Joanna Piekarski		
3	Dr Joy Drayton	Tauranga	
4	Ken Catt	Forest & Bird Protection Society	Waitakere City, Wellington
5	Richard Keller	Wellington	
6	Tina Morgan	Forest & Bird, Upper Coromandel	Port Charles Coromandel
7	Corrina Tucker	Palmerston North	
8	Ben Naylor	Dunedin	
9	Rick Barber	Greymouth	
10	R Young	Northland Forest Managers (1995) Ltd	Kerikeri
11	Jim Weston	Wairarapa Federated Farmers	Masterton
12	John R Barton	Greenplan Forestry Ltd	Te Kuiti
13	Colin Maunder	PF Olsen and Co Ltd	Rotorua
14	David Renouf	Hastings	
15	Paul Dow	Wellington	
16	Franz G. Iseke	Whangarei	
17	Brian Van Dam	Auckland	
18	PJ Fleming	Willow Lea Partnership	Leeston
19	B Taniora	Rereahu Regional Management Committee	Te Kuiti
20	Terisha Luxford	Otago	
21	Edward Loose	Te Anau	
22	Hamish Alexander	Southern Paprika Ltd	Warkworth
23	WM Duncan	Paraparaumu	
24	Vincent Gray	NZ Climate Truth	Wellington
25	Chris de Freitas	University of Auckland	School of Geography & Environmental Science, Auckland
26	PM Wallis	Bulls	
27	JB Cooke	Auckland	
28	Paul Earnshaw	Auckland	
29	Kurt Snyder	Christchurch	
31	PWJ. Clough	Wellington	
32	Nick Schofield	Synergex Systems	Browns Bay, Auckland
33	B Paterson	Lumsden	
34	Allan Kane	Cromwell	
35	AM Roberts	Ashburton Farm Forestry Assn	Ashburton
36	Roy Netzer	Solar Tech Limited	Auckland

37	Marie Locke	Invercargill	
38	Michael Taylor	NZ Native Forests Restoration Trust	Green Bay, Auckland
39	Carol Bergquist	Waitakere City Council	Waitakere City, Auckland
40	Blair Dickie	Environment Waikato	Hamilton
41	Kerry Wood	The Sustainable Energy Forum	Wellington
42	Murray Gilbertson	Hastings District Council	Hastings
43	Mike Eberlin	Milburn New Zealand Limited	Addington, Christchurch
44	Nick Wilson	MedEco	Wellington
45	RS Whitney	CRL Energy	Lower Hutt
47	Niall Kramer	Caltex	Wellington
48	James Griffiths	NZ Forest Industries Council	Wellington
49	Rob McLagan	NZ Forest Owners Association	Wellington
50	Rodger Spiller	NZ Business Council for Sustainable Development	Wellington
51	Nicki Crauford	Transpower	Wellington
52	Jo Wills	NZ Wool Board	Wellington
53	Greenhouse Policy Coalition	Wellington	
54	Jonathan Fletcher	Christchurch City Council	Christchurch
55	Steve Vickers	Palmerston	
56	PJ Rolfe	Matamata Piako District Council	Te Aroha
57	Mike Patrick	Petroleum Exploration Association of NZ	Wellington
58	Tim and Helen Ensor	Integrated Sheep & Beef farmers	Cheviot
59	Paul Pretorius	Grey District Council	Greymouth
60	Robert Webster	Websters Hydrated Lime Co Ltd	Havelock North
61	Roy Grose	Picton	
62	Roger Kerr	NZ Business Roundtable	Wellington
64	David Hammond	Middle Districts Farm Forestry Assn	Marton
68	Katy Brown	Wellington	
69	NZ Minerals Industry Association	Wellington	
70	Rick Osborne	Air New Zealand	Auckland
71	Brian Simms	Kaitaia	
72	Diana Austring	Waiheke Island	
73	Madeline Higgins	Welling	
75	Chris Lester	Horizons MW	Palmerston North
76	Dr Don Elder	Solid Energy	Christchurch
78	ML Robbins	Dunedin	

79	S Payne	Invercargill	
80	F J Weatherburn	Gore	
83	Gordon Braithwaite	Wellington	
87	Garry Law	Environmental Defence Society	Auckland
88	Debbie Bland	Dunedin	
89	Toni Morrison	The West Coast Regional Council	Greymouth
90	B Lester	Ashburton District Council	Ashburton
91	Sheila Watson	Mighty River Power	Hamilton
92	Sherry Early-Aden	Thames Coromandel District Council	Thames
93	Roger Dickie	Rodger Dickie Ltd	Waverley
94	Graeme Upritchard	Christchurch	
95	Jeff Jones	Environment BOP	Whakatane
96	Andrew Pearce	Manaaki Whenua Landcare Research	Lincoln, Canterbury
97	John Talbot	Environment Canterbury	Christchurch
98	Neil Shewan	GL Bowron & Co Ltd	Christchurch
99	Lynda Sutherland	National Council of Women of NZ	Wellington
100	Paul Nicholas	New Zealand Shipping Federation	Wellington
101	Land Owners Forum	Wellington	
103	Charles Mitchell	Prime Range Meat Ltd	Christchurch
104	Warwick Isaacs	Timaru District Council	Timaru
105	WE Bayfield	Taranaki Regional Council	Stratford
106	Wellington Rainforest Action Group	Wellington	
107	Emily Bailey	Wellington	
108	Kane Fawcett	Wellington	
109	Alex McClymont	Wellington	
110	The Bailey family	Wellington	
111	Terrence Currie	Major Electricity Users Group	Wellington
112	Peter Silcock	National Organisation for Fruit & Vegetable Growers	Wellington
113	John Woods	Contact Energy	Wellington
114	Tami Woods	Environment Southland	Invercargill
115	Ian Barton	Tane's Tree Trust	Papakura
116	Sarah Knowles	Genesis	Auckland
117	Kath Coombes	North Shore City Council	Takapuna
118	Dave Bennett	CHH Biogrid	Auckland
119	MJ Loza	New Zealand Game Industry Board	Wellington
120	Kathleen Dawson	Dunedin	
121	Noeline Holt	Public Health Association	Wellington

		of NZ	
122	Joan Wright	Fonterra	Auckland
123	Ian Bradley	Auckland Regional Council	Auckland
124	Jo-Anne Vaughan	Forest & Bird, Golden Bay Branch	Collingwood
126	A Armstrong	Gisborne District Council	Gisborne
127	The NZ Business Round Table		
128	Tim Brownlee	CMP Kokiri	Greymouth
129	Ian Stringer	Middle Ridge Forest Co Ltd	Nelson
130	Kane Fawcett	Nature's Backyard	Wellington
131	Dan Riddiford	Te Awaiti Station	Wellington
132	K Mitchell	Napier	
133	Arnold Yeoman	Degussa Peroxide	Morrinsville
134	Mark Oughton	Norske Skog Tasman Ltd	Kawerau
135	The NZ Council of Trade Unions		
137	Cliff Mason	Pacific Institute of Resource Management	Wellington
138	Helen Richards	Powered Living Ltd	Nelson
139	Patrick Dale	Auckland	
142	Karen Price	Global Renewables Ltd	Minter Ellison Rudd Watts
143	John Maxwell	Ballance Agri-Nutrients (Kapuni) Ltd	Hawera
144	Dick Whitelaw	New Zealand Steel Ltd	Auckland
145	Bob Riley	Reid Technology	Takapuna
148	Julia Stuart	Churches' Agency on Social Issues	Wellington
149	Peter Rasmussen	NZWPMA	Auckland
150	New Zealand Farm Forestry Assn	Waikato Branch	
151	Climate Defence Network		
152	Roger Fairclough	East Harbour Management Services Ltd	Wellington
153	Dr Nancy Rehrer	Queenstown	
154	Rod Stace	Rotorua	
156	Gillian Blythe	Meridian Energy	
157	Peter Beech	The Guardians of the Sounds	Picton
158	NZPVA		
159	Solar Industries Association	Wellington	
160	John Rutherford	Energy Management Association	Wellington
162	GM Henderson	Christchurch	

165	Peter Caldewood	Trustpower	
166	Gordon Foster	Polarcold Stores Ltd	Timaru
167	Cherie Flintoff	Hamilton City Council	Hamilton
168	Anita Gardner	Pacifica Shipping 1985 Ltd	Lyttelton, Christchurch
169	Comalco New Zealand Ltd		
170	The Meat Industry Association of NZ		
171	Steve Markham	Tasman District Coucil	Richmond
172	Ken Shearer	Kenroll Industrial Coal Ltd	Thames
173	R Marriott	Queen Charlotte Wilderness Park	Cape Jackson, Queen Charlotte Sd
174	Allan Frazer	Meat New Zealand	Wellington
175	Zoran Gligorijevic	Davis Gelatin NZ Ltd	Christchurch
177	Hamish Levack	NZ Farm Forestry Assn	Wellington
178	Dr Hilton Furness	NZ Fertiliser Manufacturers Research Association Inc	Auckland
179	Niki Carling	Samsara Ltd	Rotorua
181	Tim Thorpe	NZ Institute of Forestry	Christchurch
182	Mary Sparrow	Waimakariri District Council	Rangiora
183	Methanex New Zealand Ltd		
185	David MacClement	Greenhithe	
187	Bioenergy Association of NZ		
188	Barry Richardson	Westland Milk Products	Hokitika
190	BG Chamberlain	The Taranaki Regional Council	
192	Jane Johnstone	Rodney District Council	Orewa
195	Cunningham Atchinson	Gourmet Paprika Ltd, Auckland International Airport	Auckland
200	Rockgas Limited		
201	Michael Lincolne	Spooners Range	Wakefield
202	Michael Cambridge	Blenheim	
203	P Atkinson	Pauatahanui	
204	Chris Olsen	Pavement and Bitumen Contractors' Association	Wellington
205	Tim Walsh		
206	Graham Milligan	Southland Farm Forestry	Southland
207	Jenette Blake	Waikato District Health Board	Hamilton
209	Philip Lissaman	Raumati	
210	John Allen	New Zealand Post	Wellington
211	Derek Wilson	Wellington	
212	PS Tocker	New Zealand Institute for	

		Crop & Food Research	
213	MM Halliday	New Zealand Farm Forestry Association	Wellington
214	Ken Piddington	Waikato University	Hamilton
215	Steve Goldthorpe	URS New Zealand	Auckland
216	Peter Bodeker	Dairy Insight	Wellington
217	Sherry Phipps	Lower Hutt	
221	Louise Savage		
222	Alistair Rowe	Plastic New Zealand	Auckland
223	Bronwyn O'Keefe	IPENZ	Wellington
228	Brett Highsted	New Vale Coal Co Ltd	Gore
230	Angus Kennedy-Perkins	GRD Macraes	Palmerston
231	Jacob Haronga	Federated Farmers of NZ	Wellington
232	David Rarnes	Tourism Industry Association	Wellington
233	RS Whitney	Energy Federation of New Zealand	Wellington
234	Frank Wall	Silver Fern Shipping Ltd	Wellington
235	Richard Hayes	Environmental Intermediaries and Trading Group Ltd	Auckland
239	Peter Whitehouse	Business New Zealand	Wellington
240	Peter Read	Peter Read Consultancy Ltd	Palmerston North
242	Eva Naylor	Wellington	
243	Jo-Anne Vaughan	Collingwood	
245	RH Buchanan	Kaitaia	
247	Bruce Hanna	Sinai Hort Ltd	Richmond
248	Doug Miller	Mosgiel	
249	Anthony Opie	Motueka	
250	Susan Southey	Masterton District Council	Masterton
251	Paul Hill	Hamilton	
252	Mark Denize	East Bay Conservation Society	Picton
254	Megan McKenna	Institute of Geological & Nuclear Sciences	Lower Hutt
255	Wayne Hutchinson	Venture Southland	Invercargill
256	Walter and Betty Rowe	Picton	
259	Eco-City Tauranga	Tauranga	
260	Bruce Chapman	Carter Holt Harvey Ltd	
263	Jane Dawson	Cycling Advocates Network of NZ	Auckland
264	Fred Braxton	Waiheke Island	
265	Perry Kerr	Motor Industry Association	Lower Hutt
266	Alistair Wilson	New Zealand Wind Energy Association	Wellington

267	John Hutchings	Local Government NZ	Wellington
268	Noel Richards	Tasman Insulation New Zealand Ltd	Auckland
269	Kathryn Schicker	Waikato District Council	Ngaruawahia
270	George Fairbairn	NZ Automobile Association	Wellington
271	Doug Carter	EnviroWaste	Auckland
272	Craig Pauling	Te Runanga o Ngai Tahu	Christchurch
273	Bryan Taylor	Auckland City Council	Auckland
274	Jeremy Dillon	Blark Farms Limited	Auckland
275	Jeremy Dillon	Forest Habitats Limited	Auckland
276	Jeremy Dillon	Tamariki Farms Limited	Auckland
277	Jeremy Dillon	Tahekeroa Forests Joint Venture	Auckland
278	Jeremy Dillon	Maire Consultants Limited	Auckland
279	Jeremy Dillon	Horopito Partnership	Auckland
280	Jeremy Dillon	Hiway Stabilizers New Zealand Ltd	Auckland
281	Katy Steele	Sustainability Ltd	Nelson
283	Robert ter Veer	Kaiwaka	
284	Grant Dunford	Megawatt Resources Ltd	Wellington
285	Matt Hickman	Hamilton	
286	Landcare Research		
287	Rachel Palmer	Shell Petroleum Mining Ltd	Wellington
288	Wayne McClunie	Christchurch	
289	Diane Turner	Whakatane District Council	