



Ministry for the
Environment
Manatū Mō Te Taiao

Gazetting New Zealand's 2050 Emissions Target: Summary of Submissions

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Summary of submissions: 2050 emissions reduction target

On 29 January 2011, the Government released a position paper on the proposed emissions reduction target of 50 per cent reduction of greenhouse gases from 1990 levels by 2050. The submission period on the position paper ended on 28 February 2011, and the Ministry for the Environment received 1737 written submissions.

1. The key issues received in submissions were:
 - expressed scepticism about climate change
 - the 2050 emissions reduction target should have the same conditionality that accompanied the 2020 emissions reduction target
 - the need to set a more ambitious target
 - the need to be clearer about the accounting rules used to measure the target
 - the need to set interim targets in addition to the five-year reporting requirement
 - the need to have analysis on how the target might be achieved and new policies to support its achievement
 - expressed uncertainty about the effectiveness of the New Zealand Emissions Trading Scheme (NZ ETS) as a means to reduce emissions in New Zealand.
2. Sixteen submitters were sceptical of climate change and therefore did not support the 2050 emissions reduction target being gazetted. Their submissions tended to focus on the validity of the science of anthropogenic global warming, and many provided arguments against the science used in the 2050 emissions reduction target brochure.
3. A further three submitters did not agree that the 2050 emissions reduction target should be gazetted because:
 - New Zealand should maintain its stance of being a ‘fast follower’ and wait to see what other countries will do
 - New Zealand should be focusing on economic recovery following the global recession, and the Christchurch earthquake and/or
 - the 2050 emissions reduction target should only be a responsibility target like the 2020 target and conditional upon equivalent efforts by New Zealand’s major trading partners and competitors.
4. The Green Party published a short submission guide on their website, advocating for a more ambitious target, and for the target to be more transparent in terms of the accounting rules used (ie, Kyoto Protocol rules versus the UNFCCC rules). Four submitters used the points bulleted on the Green Party website, in some form, in their submissions.
5. Greenpeace also produced a short submission guide on its *Sign On* website. The submissions support the gazetting of an emissions reduction target for New Zealand, but state the target should be 40 per cent reductions by 2020 and 80 per cent by 2050. There were 1663 submissions that used the Greenpeace template.

6. In addition to the submissions that drew from Green Party and Greenpeace submission guides, 21 submissions called for a more ambitious target. Common arguments supporting a more ambitious target were:
- the long-term consequences of not acting outweigh any short-term impact of taking action
 - we should be doing more to protect our clean green image/brand
 - we should base our target on the *Intergovernmental Panel on Climate Change (IPCC)* suggestion that there needs to be around 80–95 per cent reductions by 2050 for developed countries and/or
 - our target should be equivalent to other countries' targets, such as the United Kingdom's target of an 80 per cent emissions reduction by 2050 below 1990 levels.
7. Included in the submissions for a more ambitious target, were comments about the need to set a clear path, with interim targets, towards the 2050 emissions reduction target in addition to the five-year reporting requirement. The reasons stated for having interim targets were to ensure action from the Government towards meeting the 2050 emissions reduction target, and to ensure the path taken towards the target minimises the potential cumulative greenhouse gas emissions in that period.
8. The need to have policies and strategies, such as a transition plan, on how the target might be achieved was also raised. Some submitters considered that providing a pathway towards achieving this target is necessary to provide certainty for business.
9. Within some of the submissions, uncertainty was expressed about the effectiveness of the NZ ETS to reduce emissions. Also raised was the need for more complementary measures such as a moratorium on new coal mines, shifting spending on new motorways to public transport, and a focus on developing the green sector in New Zealand's economy.
10. We received submissions from 30 major stakeholder groups. These submissions are summarised in the table below.

Organisation	Comment
Beef + Lamb New Zealand, Deer Industry New Zealand and the Meat Industry Association	Recommend no target for emissions reduction is set before rigorous analysis of the likely impacts and feasibility of a range of greenhouse gases reduction scenarios has been undertaken and presented to stakeholder groups. They also recommend the conditions that were applied to the 2020 reduction target are also applied to any 2050 emissions reduction target, also including a further condition reading: "that mitigation technologies are available, and economical, which allow New Zealand to meet the reduction target without limiting food production in New Zealand".
BusinessNZ	Suggests the 2050 emissions reduction target not be gazetted, pending consideration of it by the Emissions Trading Scheme Review Panel, analysis from Treasury, and an assessment of the Durban Conference of Parties (COP 17). It also suggests that if the Government decides to push ahead in lieu of this, achievement of the target should be assessed against the conditions that have been applied to the 2020 emissions reduction target range or any other conditions appropriate to New Zealand's unique economic and emissions circumstances.
Carter Holt Harvey Pulp & Paper	Recommends the 2050 emissions reduction target should be based on further analysis of the costs to New Zealand and our relative efforts; a process to establish a broad consensus; a clear understanding of the intent of the target; and promulgated as an aspirational goal, subject to periodic review and with conditions that benchmark equivalent efforts by the majority of our prevailing trading partners and competitors.
Coal Association of New Zealand	States that the Government should establish a means of regularly reviewing its targets with respect to a performance measure of comparable international effort by our trading partners. Abatement costs (relating to technology improvements) should be an important component of that performance measure.

Organisation	Comment
Dairy NZ	States that a 2050 emissions target should not be gazetted at this time, and advises a cautious and conditional approach to target setting, particularly given the uncertainty that surrounds the treatment of agricultural emissions from competitive food producing nations such as New Zealand.
ECO	Supports New Zealand adopting a 40 per cent cut in greenhouse gas emissions by 2020 over 1990 levels and an 80–95 per cent cut by 2050, with the establishment of three-year reduction targets, monitoring and reporting to allow this to be phased and tracked, and policies and prices set to achieve these reductions. It also recommends the targets be set in terms of net to net and gross to gross, not gross to net.
Environs Holdings Limited (environmental subsidiary of Te Uri O Hau Settlement Trust)	Recommends in addition to assessing the economic costs of the 2050 emissions reduction target, consideration should be given to Te Uri O Hau's kaitiaki roles and environmental aspirations in planning for New Zealand environment management.
ExxonMobil Australia Group of Companies	States that setting a clear greenhouse gas reduction target for 2050 cannot provide "certainty" for business. Without any analysis of the resulting costs to the economy, all it can do is indicate an "aspirational" objective.
Federated Farmers of New Zealand	States that gazetting the proposed 2050 emissions reduction target should be delayed to give regard to broader processes and that the target should be conditional in much the same way as the 2020 emissions reduction target. It also questions why the target is being gazetted now, when other processes have a clear role in informing the decision on what New Zealand should commit to the long-term eg, the NZ ETS review, and the next Conference of Parties in Durban (COP 17).
Fonterra	Recommends the same conditionality that accompanied the Government's 2020 emissions reduction target be applied to the 2050 emissions reduction target and that an additional condition be included which requires the target to not limit food production. The target must be accompanied by clear guidelines on how progress towards that target will be assessed in the short term.
Greenhouse Policy Coalition	Recommends the 2050 emissions reduction target be presented simply as the Government's current policy and an aspirational goal and that it not be viewed as a "must reach" target.
Greenpeace Aotearoa New Zealand Inc	Recommends the Government implement a regulated target of 40 per cent emissions reductions by 2020 and 80 per cent emissions reductions by 2050, based on a 1990 baseline.
Gull New Zealand	Supports the proposed 2050 emissions target and states New Zealand will need to maximise the potential of all available emissions-cutting techniques eg, by growing a strong domestic biofuels industry.
Kāpiti Coast District Council	States that more ambitious targets will be needed to give a reasonable chance of avoiding dangerous climate change, expressed in the Copenhagen Accord as warming exceeding 2 degrees Celsius above the pre-industrial average.
Meridian Energy	Agrees that the proposed target seems appropriate at this stage, but that there must be an opportunity to raise the bar if technology changes reduce the cost of emissions reductions, if there are changes in policy settings in international markets which mean New Zealand is not aligned to the international effort, or if there is scientific evidence that clearly requires a higher target.
Mighty River Power Limited	Welcomes the establishment of a greenhouse gas emission reduction target that provides a high-level policy direction for the medium to long term. However, it states there are no tools or pathways setting out how New Zealand will achieve the target to give investment certainty with regard to where long-term climate change policy is going.
New Zealand Business Roundtable and Major Electricity Users' Group	Recommends a more rigorous consideration of the target is needed including conditions attached to the responsibility target set for the 2020 emissions reduction target range; discussion on whether the 2050 emissions reduction target should be a single point or a range; discussion on the optimal timing of setting a target; and more detailed analysis by officials of the table comparing targets set by other countries. Also recommends a cross-submission stage as setting this target is too important to allow rhetoric or unsubstantiated claims by other parties to go unchallenged.
New Zealand Forest Owners Association Inc	Supports the gazetting of New Zealand's 2050 emissions target.

Organisation	Comment
New Zealand Green Building Council	Commends the Government for committing to implementing an economically sound and environmentally effective climate change policy and establishing a credible long-term emissions reduction target. States that it is critical that a range of complementary measures are developed to kick-start emissions reductions now. Suggests the built environment provides New Zealand with its most immediate opportunity to establish best practice examples of emissions reductions which deliver substantial cost benefits and accelerate action.
New Zealand Institute of Forestry	Supports the promulgation of a long-term emissions cost and targeted greenhouse gas reduction, and encourages the development and promulgation of a more strategic approach to this working with the Wood Council of New Zealand.
New Zealand Steel Ltd	Supports the Greenhouse Policy Coalition submission.
Oxfam	Does not support the Government's proposed gazetting of a greenhouse gas reduction target of 50 per cent below 1990 levels by 2050 because it considers the proposed 50/50 target too weak and that it fails to act sufficiently to avoid dangerous climate change or to send a strong signal that stimulates investment in low-carbon development. Recommends that New Zealand should reduce domestic emissions by 40 per cent below 1990 levels by 2020 and by 90 per cent below 1990 levels by 2050.
Parliamentary Commissioner for the Environment	Supports setting a 2050 emissions reduction target for reducing greenhouse gas emissions but states that the target of 50 per cent below 1990 levels by 2050 is too conservative. Suggests the Government should strengthen the NZ ETS by significantly reducing the allocation of free carbon credits and develop a credible plan for setting New Zealand on a low-carbon path.
Royal Society of New Zealand	Applauds the Government for wishing to formally commit to a long-term target and for setting in motion the steps needed to achieve it. However, it considers a 50 per cent reduction target at the lower end of what is considered globally necessary to meet a target of no more than 2°C warming above pre-industrial levels.
Seafood Industry Council	States that impact on the fishing industry with its dependence on fossil fuels would be devastating, and until information is available on the costs and benefits and the prospects of attaining targets, the gazetting of a 2050 emissions target should be deferred.
Straterra Inc	Recommends the Government a) set an aspirational target b) review the target regularly, on receipt of evidence of major technological breakthroughs, meaningful actions by other key countries and assessments of comparability of effort and c) define "major technological breakthroughs", and "meaningful actions by other key countries", and by specify how progress towards each would be measured and reported.
Sustainability Council	States that a 2050 emissions reduction target is a serious distraction to facing up to: the continued growth in gross emissions; the temporary offset of those emissions by credits from crop forestry; the failure to account for the multi-billion dollar contingent liability arising from the above, and the allocation of that liability; and the need for a serious 2020 emissions reduction target that takes account of these factors and the updated science.
Wellington City Council	Generally supportive of the proposed 2050 emissions target of reducing New Zealand's net emissions 50 per cent below 1990 levels. States that the Government will need to dedicate more resources to achieve the proposed target. For example, in maintaining initiatives that promote afforestation; and promoting investment and resources toward public transport, low-carbon transport fuels and initiatives that support compact growth and active transport modes.
Westpac	Supports the Government gazetting the New Zealand emissions target, and recommends that the Government provide a definite pathway for the development of the NZ ETS through to 2050 and a target annual emissions pathway (expected annual emissions) for New Zealand through to 2050.
WWF	Supports, in principle, setting a long-term emissions reduction target. However, it should be a unilateral, unconditional target cutting emissions by at least 80 per cent below 1990 levels by 2050 and using the UNFCCC accounting system, not the Kyoto Protocol accounting system.