

# Setting New Zealand's post-2020 climate change target

## Submission form

The Government is seeking views on New Zealand's post-2020 climate change contribution under the United Nations Framework Convention on Climate Change (UNFCCC).

You can have your say by making a submission using this form or using the online tool available at [www.mfe.govt.nz/more/consultations](http://www.mfe.govt.nz/more/consultations).

For more information about this consultation:

- Read our [Consultation on New Zealand's post-2020 international climate change contribution web page](#)
- Read our discussion document: [New Zealand's Climate Change Target: Our contribution to the new international climate change agreement](#)

**Submissions close at 5.00pm on Wednesday 3 June 2015.**

## Publishing and releasing submissions

All or part of any written submission (including names of submitters), may be published on the Ministry for the Environment's website [www.mfe.govt.nz](http://www.mfe.govt.nz). Unless you clearly specify otherwise in your submission, we will consider that you have consented to website posting of both your submission and your name.

Contents of submissions may be released to the public under the Official Information Act 1982 following requests to the Ministry for the Environment (including via email). Please advise if you have any objection to the release of any information contained in a submission and, in particular, which part(s) you consider should be withheld, together with the reason(s) for withholding the information. We will take into account all such objections when responding to requests for copies of, and information on, submissions to this consultation under the Official Information Act.

The Privacy Act 1993 applies certain principles about the collection, use and disclosure of information about individuals by various agencies, including the Ministry for the Environment. It governs access by individuals to information about themselves held by agencies. Any personal information you supply to the Ministry in the course of making a submission will be used by the Ministry only in relation to the matters covered by this consultation. Please clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that the Ministry may publish.

## Questions to guide your feedback

Your submission may address any aspect of the discussion document, but we would appreciate you paying particular attention to the questions posed throughout and listed in this form. You may answer some or all of the questions. To ensure your point of view is clearly understood, you should explain your rationale and provide supporting evidence where appropriate.

### Contact information

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### Objectives for the contribution

**1a. We have set the following three objectives for our contribution:**

- **it is seen as a fair and ambitious contribution – both by international and domestic audiences**
- **costs and impacts on society are managed appropriately**
- **it must guide New Zealand over the long term in the global transition to a low emissions world.**

**Do you agree with these objectives for our contribution?**

- Yes
- No

**1b. What is most important to you?**

**“It is seen as a fair and ambitious contribution – both by international and domestic audiences  
New Zealand”**

No individual country can solve climate change and every country including China and the US can fairly argue that their individual contribution won't matter in isolation. Every country has a role to play and NZ needs to be seen to be making a fair contribution

This is of particular importance to New Zealand citizens in low lying areas of Tokelau and the Cook Islands who are relying on a binding global agreement to reduce GHG emissions so they can

continue to live in their territories. If we can't commit to a strong emission reduction target that protects our own citizens, how can we expect any other country to do the same.

## What would be a fair contribution for New Zealand?

### **2. What do you think the nature of New Zealand's emissions and economy means for the level of target that we set?**

As a wealthy country with abundant renewable energy resources, strong access to capital markets and foreign investment and as world leaders in agricultural emission reduction research New Zealand is well placed to set an aggressive target for emission reductions in-line with that suggested by IPCC working group 3. That is a reduction of GHG emissions in absolute terms relative to 2010 by 2020, by 41 – 72% by 2050 and 78 – 118% by 2100.

As well as fairness in terms of what New Zealand is capable of delivering we also need to consider fairness in the context of future generations and those that will bear the brunt of the effects of climate change.

For New Zealand we need to have specific consideration for our citizens living in low lying areas of Tokalau and the Cook Islands who are at the forefront of the effects of climate change. If we can't commit to a strong emission reduction target that protects our own citizens, how can we expect any other country to do the same.

## How will our contribution affect New Zealanders?

### **3. What level of cost is appropriate for New Zealand to reduce its greenhouse gas emissions? For example, what do you think would be a reasonable impact on annual household consumption?**

From a rational economic point of view the level of cost that is appropriate for New Zealanders should be the highest cost that still provides a net environmental benefit. The Stern review in 2006 estimated the cost of climate change at 5% of global GDP on an ongoing basis and costed mitigation at around 2% of GDP.

Measuring the effect of an emissions target using the impact on household consumption is therefore completely ridiculous as it ignores benefits to individuals or the public that might be derived from that reduction in consumption. This both in terms of climate change mitigation and other public co-benefits (e.g. improved health outcomes).

We also need to consider though that most opportunities for reducing emissions are profitable so inherently will reduce household consumption but at no cost or at a net benefit. For example Lifecycle costs of CFL and LED lighting are less than energy hungry incandescents and smaller cars. So realistically we have a long way to go before we need to start paying to reduce emissions.

4. **Of the opportunities for New Zealand to reduce its emissions (as outlined on page 15 of the discussion document), which do you think are the most likely to occur, or be most important for New Zealand?**

## Summary

5. **How should New Zealand take into account the future uncertainties of technologies and costs when setting its target?**

The technologies are available now to reduce emissions to a level that will keep temperature increases to 2°C. Improved technology is merely an upside risk that will reduce the cost of reducing GHG emissions and shouldn't effect target setting now.

## Other comments

6. **Is there any further information you wish the Government to consider? Please explain.**

This form, the discussion document and the supplied modelling present a completely false view on the opportunity for carbon emission reductions and New Zealand's target setting. The documents seem to do as much as they can to dampen any expectations on what is achievable rather than presenting a balanced view on what our target should be.

The NZ Herald's Brian Fallow summed the process up well when he said "the...worlds...[the government] asked the modellers to explore bear little resemblance to the one we inhabit, so they illuminate the debate we ought to be having in a pretty limited way." In his 29 May article titled "Government Shrugs Off Climate Change".

## When your submission is complete

Email your completed submission to [climate.contribution@mfe.govt.nz](mailto:climate.contribution@mfe.govt.nz) or post to Climate Change Contribution Consultation, Ministry for the Environment, PO Box 10362, Wellington 6143.

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