

# 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

Name	TE & S Broad
Organisation (if applicable)	
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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~~ **equitably**
- 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?

- X  Yes  
 No

1b. What is most important to you?

- a. That we start now;
- b. That step-down (reducing) targets are evidence based (on the sources of our domestic NZ wide) emissions and on the need to reduce our (NZ) overall emissions (of CO<sub>2</sub> and other GHGs) to below 200 ppm;
- c. That we implement a “cap on emissions” strategy not a carbon-tax strategy.

### 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?**

For the agricultural sector: Reduce ruminant livestock numbers; encourage forestry (of natives as well as timber)

For the energy sector: Replace gas-fired stations with geothermal; establish a national strategy for non-fossil-fuel based energy generation (leaving capital replacements to our market based power generators does not address nation-wide priorities); encourage through low interest loans the installation of solar energy plants on householders homes (to reduce demand on the national grid).

For the transport sector: establish a nation-wide integrated road, rail, shipping & aero entity to coordinate the development of a transport infrastructure that is not sectorally biased; encourage the adoption of e-based (smart apps) to coordinate the transport of freight nation-wide and locally; electrify the railway grid nationally; encourage the use of electric powered vehicles (and a nation-wide system for recharging and servicing them); implement a Norwegian-style state tax on vehicles using fossil fuels

## 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?**

Households should pay as much as they can afford; the amount being related to household income (ie less for low incomes and progressively higher as income increases).

The document distributed & discussed at the “road-show” made much about the costs to households of reductions. We think that a point made by Rod Oram recently on the Nine to Noon (radio new zealand national programme) about this matter, adopted by the State of California, is one that you should strongly consider. That is, they use as the base-line for costs comparison the cost of doing nothing, whereas your model (see Table 1: Impact of different targets etc, page 7) uses the 1990 cost levels. Oram posits that the Californians have found that instead of being a net cost per household, the reductions actually translate in today's dollars as a positive benefit to their consumers, not a cost that your model shows. And the benefits are substantial – so much so that householders and businesses there are supporters of the targeted reduction scheme. We, therefore ask that you publish both comparisons, that is based on 1990 figures as well as on the current costs of doing nothing.

**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?**

To increase fuel and energy efficiency: Reduced use of fossil-fuels & increased use of electric vehicles (contributing to better environmental outcomes and less dependency on oil producers) ; improved building standards (better insulation) & increased use of solar power by households (to contribute to better health outcomes)

## Summary

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

Implement an effective monitoring and reporting system so that everyone is kept well informed about how we are performing relative to targets

Implement a system for “road-testing” promising new technologies at a local level (provide financial &/or tax incentives to encourage participation in this) and apply those on a regional and then national scale those that “stand-up”!

## Other comments

- 5. Is there any further information you wish the Government to consider? Please explain.**
- a. Role of multinational companies: what measures (if any) are to be used to ensure that they contribute to nation-wide goals (given that they avoid paying local taxes)?
  - b. NZ should not participate in any “offset” market as a means to meet internationally agreed targets. Further, NZ it should not adopt any carbon-tax system (for local or international trading) as any such tax simply allows polluters to continue to pollute!
  - c. Plausibility: it was notable that only a single Party politician attended the Nelson workshop. If the public is to see that the subject is worthy of serious attention, then politicians of all stripes must attend, to be seen and to add a higher level of gravitas, to such events, but more importantly to hear the views expressed.
  - d. Process: Like the flag debate it is our contention that the process being followed here is upside down. Rather than first propose a target that may meet international expectations, we think the first step should be to focus on internal NZ emissions to develop targets that are evidence-based and then add together the sum all of the sector targets to arrive at a level that is achievable, for presentation in Paris in Dec 2015.

## 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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