

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.

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. 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?

- Generally yes, but with reservations about the interpretation of fairness.
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1b. What is most important to you?

What is most important is that the level of effort required to curb impacts on climate change is the level that will be effective. This may appear to be enormous, but what is at stake is the continued existence of the contemporary habitable world. This comprises not only the wellbeing of the people of the world, but also the continued existence of the wonderful variety and complexity of the natural world. Those who experienced World War 2 in Britain in 1940 will be familiar with the concept of a war of survival, and that is what the battle against climate change is. If we do not combat it our children, grandchildren and their children, and the children, grandchildren and their children in less fortunate countries, will not survive – or if they do, it will be in a world of conflict, of grim climatic

conditions, of seriously impoverished biodiversity, and absence of many things we regard as desirable for a full life and a civilised society. Therefore it is more important for our contribution to be ambitious than anything else. A corollary of this is that we must be prepared to make sacrifices to our standard of living. We cannot proceed on the basis of “business as usual”, and our concept of what is “affordable” must be adjusted to reflect this; it may appear in prospect that there will be an adverse effect on our economy and this must be accepted. To sacrifice the future for the sake of the short-term present would be totally irrational. (The sacrifice of current levels of economic prosperity might in fact turn out to be compensated for by opportunities such as those listed on page 15.)

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?

The suggestion that our high level of renewable power generation leaves us “less room to reduce emissions in this area” is misleading if it leads to the conclusion that it is pointless to look at this sector for savings in emissions, or that we should ignore the power generation sector as a sector where attempting reductions in emission is unnecessary because we already score well there. We may have less opportunity to use changes to power generation to achieve a big reduction of the national total of greenhouse gas emissions, but the natural windiness of NZ, our relatively generous amount of sunshine, our access to tidal streams and to sources of geothermal power, mean that reductions can be achieved by making more use of these resources.

The examples given in the paragraph “National circumstances/cost” show that determining targets based on levelling up the costs for different countries is not going to help fight climate change. More productive would be to focus on the greenhouse emissions per person globally, which would help level out the disparity in terms of sacrifice between developed and undeveloped countries. So my answer to the question is that we should not use the nature of our emissions and economy as the drivers to determine our target, though it may be reasonable to argue that the relatively short life of methane as a greenhouse gas in the atmosphere should mean that the total of methane emitted should be discounted by comparison with carbon-dioxide.

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?

Table 1 makes it very clear that NZ would get far greater “value for money” by opting for a 40% reduction below 1990 emission levels rather than any lesser amount, so I would opt for that degree of reduction rather than any lesser figure (though whether 40% is high enough to limit climate change I am not in a position to judge). A second reason for opting for 40% is that the cost given of an average of \$1800 per household takes no account of (a) the costs of not attempting to reduce global warming, or (b) the benefits of reducing emissions, some of which are listed on page 15. The

figure of \$1800 is therefore not credible. But if for the sake of argument it were credible, an average cost of \$1800 per household would be a trifle compared with the financial and physical costs of trying to cope with the environment that unrestrained climate change would bring.

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?

I think all the opportunities listed are likely to occur. However, the volume of benefits could be enhanced if government structures its policies in such a way as to encourage the use of renewable resources and creation of greenhouse gas sinks, and discourages processes and practices that exacerbate production of greenhouse gases. It also needs to conduct its own operations in a climate-friendly way, both for the direct effect this will have and through leading by example – “do as I do”. A glaring example of the opposite is the recent suggestion that NZ Rail should replace its fleet of locomotives with diesel-powered rather than electrically-powered engines.

Summary

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

I think NZ should have faith in the emergence of technologies that will help towards meeting the targets. It is said that if you don't aim high you can expect only mediocre results. There are many examples, both from times of war and times of peace, where necessity has proved the mother of successful invention. Three recent and relevant examples are the development of successful electric cars in response to Californian legislation banning greenhouse gas emissions from new cars (since torpedoed by the oil industry); the reported Israeli plan to overcome the problem of limited range for electric cars by setting up “swap-a-battery” stations at locations throughout the country and the complementary manufacture by Renault of cars with easily-changed batteries; and the reported reshaping of the Cuban economy in response to the economic crisis caused by the collapse of the Soviet Union and consequent disappearance of Soviet subsidies;

Other comments

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

1) The role of the political leadership should be to “sell” an ambitious target to a domestic audience, focussing on both the probable benefits from measures to combat climate change and the perils of an inadequate response, without paying too much attention to the targets adopted by other nations.

2) Political leadership should not be put off by climate change deniers, some of whom may be genuine but others (eg the oil industry) will be vested interests who, if the experience of the debate about the harmfulness of smoking tobacco is a guide, will do their best to muddy the waters and introduce doubt by producing large quantities of contrary “evidence”.

3) The job of selling the target should use examples and other material that people can easily relate to from the experience of their day-to-day lives, not just abstract concepts.

When your submission is complete

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

Submissions close at 5.00pm on Wednesday 3 June 2015.