

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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The Canterbury Hospitals Medical Staff Association (CHMSA) represents approximately 500 senior medical staff working in hospitals in Canterbury. As experienced doctors, we are concerned mindful that climate change will have serious health effects for New Zealanders and citizens of other countries. It is the greatest global health challenge of the 21st century (World Medical Association press release 28.05.2015). The Royal Australasian College of Physicians, the New Zealand College of Public Health Medicine and the New Zealand Medical Association have all drawn attention to the threats to health from climate change.

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?

Point 1 (“it is seen as a fair and ambitious contribution – both by international and domestic audiences”) is most important. New Zealand’s contribution to date has been not nearly ambitious enough. Furthermore, New Zealand’s contribution can be magnified by the responses of other countries that see New Zealand as a respected first-world nation with a record of a just approach to international problems.

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 level of the target should not be influenced by the nature of New Zealand’s emissions. The consequences of the emissions are the same, whether they are produced by agricultural activity, heavy industry or personal transport. New Zealand has a responsibility to its own citizens and the rest of the world to support a transition to a global carbon-neutral economy. As a country with historically higher global emissions than average, we should not claim a special status because of the nature of our emissions.

The agricultural sector is responsible for half of New Zealand’s carbon emissions. We acknowledge that global health relies on adequate food production, and that New Zealand is a significant contributor to the global food supply. Nevertheless, there are more and less carbon-efficient methods of producing food and there ought to be incentive for the agricultural sector to favour the latter. Novel strategies should be considered. For example, a carbon tax on individual emitters that is returned to the sector, rather than being directed to general Government funds, would encourage a reduction in emissions but reduce the adverse commercial effect on the agricultural sector overall.

It should be acknowledged that the agricultural sector is one of the most vulnerable to the effects of climate change. Increasing frequency of adverse weather events, such as droughts and floods, rising temperatures that place limits on outdoor work, the emergence of new animal and plant diseases, and the resulting psychological stress on workers should all increase the importance New Zealand places on limiting climate change.

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?

It is important that the cost of measures to reduce GHG emissions is not considered in isolation. These should be compared to the very high costs of not achieving adequate reductions, such as limits to economic growth because of adverse weather events, coping with “climate refugees”, and health effects from changed patterns of disease. Individual households will also bear significant costs from climate change, including increased insurance premiums and increased food costs.

However, the financial cost to New Zealand will be offset by co-benefits to health, quality of life and the natural environment from action to reduce GHG emissions. Increased use of active transport will reduce the incidence of obesity, cardiovascular disease and cancer. Increased use of public transport will relieve traffic congestion, reduce household commuting costs, reduce the resources that must be spent on roads and reduce air pollution. The tourism sector will not suffer the consequences of loss of New Zealand's "pure" image.

Although the quantification of co-benefits and costs from not achieving carbon neutrality in dollar terms is challenging, these have been modelled and should be accounted for when estimating the cost of GHG emissions.

New Zealanders generally accept a cost to households through taxation, in order to fund healthcare, education and maintenance of the quality of the natural environment. New Zealanders also implicitly accept limits to GDP growth in order to maintain and improve quality of life, by limiting environmentally harmful commercial activity. The Danish Government's "Energy Strategy 2050", has calculated that a 2050 carbon neutral target can be achieved with little cost, and no loss to business competitiveness (<http://www.kebmin.dk/sites/kebmin.dk/files/news/from-coal-oil-and-gas-to-green-energy/Energy%20Strategy%202050%20web.pdf> accessed 31 May 2015).

- 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?**

New Zealand must not defer action to reduce carbon emissions, in the hope that new technology will make such initiatives cheaper. The world is rapidly moving toward greenhouse gas levels that will have irreversible effects on climate, which will have severe effects on the long-term health of the population, the sustainability of the global economy and the viability of other species. Our initial focus should be to limit global warming to 2° by the end of the century, but even this temperature rise will be associated with significant detrimental climate change and, even if this goal is achieved, temperatures will continue to rise beyond 2100. New technology may allow the global community to better tackle these subsequent challenges.

Other comments

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

It is imperative that New Zealand's Intended Nationally Determined Contribution (INDC) commits to a global and New Zealand zero carbon target by 2050 or sooner, with annual steps outlining how to

achieve this as quickly as possible. This should include at least 40% cuts by 2030 in our gross domestic greenhouse gas emissions compared with 1990, towards at least 95% by 2050. This is in line with what other wealthy nations have pledged.

Credible, transparent, cross-party plans need to be included, with a legislated, independent Climate Commission to ensure NZ meets its targets and stays within the global carbon budget.

New Zealand's plan to achieve carbon neutrality should include the removal of all subsidies, funding and tax breaks to the fossil fuel industry within the next ten years. It is illogical to espouse a transition to sustainable energy sources on the one hand, while placing them at a disadvantage on the other by subsidizing non-sustainable sources.

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.