

Consultation on setting New Zealand's post-2020 climate change target



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Objectives for the contribution

Do you agree with these objectives for our contribution? Yes

1b. What is most important to you?

New Zealand needs to commit to a fair and ambitious contribution. It is important to take into account all the costs AND benefits of action on climate change in setting the target. The decision must also be evidence-based. We cannot be making this important decision based on emotions and subjective morals.

The Government has used the "fair share" tagline as an excuse for inaction. We are currently not doing our "fair share" to combat irreversible climate change. Few New Zealanders know that despite our small contribution to global climate change, the country is amongst the top five of Kyoto Protocol Annex I countries for per capita emissions. Given the disproportionately large contribution to climate change on a per capita basis, arguably we need to be doing more.

Secondly, a small share of global emissions is no excuse for inaction. Other developed countries with a similar share of global emissions are Norway and Switzerland. They have unconditional 30 per cent and 20 per cent below 1990 by 2020 reduction pledges respectively. Compared with these two countries, how can we say that our 5 per cent target by 2020 is a "fair share"?

Lastly, our current 2050 emissions reduction target cannot be taken seriously as the 2020 binding target is only five per cent. Without ambitious short-term targets, the technology, infrastructure and behavioural changes needed to meet the 2050 target will not be in place.

I am concerned that we are using forestry sinks to help meet the 2020 target. If the plantations are permanent, that would be acceptable. However, forestry that will be eventually be logged should not be used to pretend that we are reducing emissions.

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?

I ask you to adopt a minimum target of a 40% emissions reduction in net emissions below 1990 levels by 2030 – the minimum contribution required to keep us under 2 degrees global warming.

I accept that almost 50 per cent of our emissions come from agriculture. I realise that methane has a shorter life span in the atmosphere than carbon dioxide. However, its short-term potency cannot be disregarded.

In my view, it is unsustainable for New Zealand to continue to rely on agriculture as the driver of our economy. We are an agricultural nation historically, but this does not mean that we have to remain so. This is a great opportunity to reduce the size of the agricultural sector and to support and grow other aspects of our economy. Agriculture is not just an atmospheric pollutant. It is also destroying our rivers and aquatic health. The sector must be scaled

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back.

I agree and applaud New Zealand for having one of the world's highest rates of renewable electricity generation. However, we can do more. Electricity is only a part of the energy sector. We have been gifted with large rivers, capable of hydro energy. Other countries, such as Denmark, have no hydro power potential, and yet are making leaps in terms of emissions reduction. Denmark has set a total emissions reduction target of 40 per cent by 2020 compared with 1990 levels. They see this target as necessary in light of EU's long-term goal of a 80 to 95 per cent reduction by 2050. We cannot use the size of our country as an excuse for inaction.

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 would be a reasonable reduction in annual household consumption?

The Government consultation document treats action on climate change as a cost, whereas failure to take action is actually the cost. Treasury found that if New Zealand continues on its current trajectory of increasing emissions, the cost to taxpayers of even a modest 5% reduction target will be up to \$52 billion. The more we lower our emissions the more we will reduce this cost.

The consultation document also ignores the benefits of climate change action. Imagine the millions that would be saved on health care costs, with reduced respiratory illnesses such as asthma caused by our poorly insulated homes. Imagine the health benefits of having less congestion on the roads and more people out cycling. I admit that there will be a cost to reducing emissions but the long term benefits far outweigh those costs.

The cost involved in reducing emissions should be mostly based on a polluter-pays framework. If polluting industries continue to be subsidised, then there is no incentive to change their practices. The current preferred mode of national regulation, the Emissions Trading Scheme, is simply inadequate. It must be re-designed. Criticised as being "too soft on big polluters", it lacks the essential element of a cap-and-trade system which is an overall cap on emissions. Therefore, genuine environmental protection is unlikely under this current system.

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?

Energy efficiency is very important to me. Demand for energy is only going to increase going forward. Therefore, increasing renewable energy and energy efficiency go hand in hand. We must set strict regulations on building standards, the fuel efficiency of import vehicles and household appliances. Government buildings need to be retrofitted to increase energy efficiency and there needs to be increased funding for home insulation. Most people still fail to realise that all these measures provide immediate, tangible benefits. The Government has an obligation to improve health and wellbeing of all New Zealanders. It is unjust for so many to live in damp, cold homes.

Summary

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

The scientific community is clear that drastic action on climate change is needed now. There is sufficient certainty to underlie an ambitious target. Future uncertainties should not be given significant weight. You would not hear your doctor say to you "eat all the junk food you like, there might be a miracle cure to diabetes in 20 years time".

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Other comments

6. Is there any further information you wish the Government to consider? Please explain.
New Zealand cannot seriously tackle climate change unless we strive for hierarchical consistency between high level policy, law and on-the-ground implementation. The effect of the Resource Management (Energy and Climate Change) Amendment Act 2004 and the Supreme Court decisions in Buller Coal and Greenpeace mean that little weight is given to the climate change effects of fossil fuel use and extraction in decision making. My LLB Honours dissertation examined how the effect of greenhouse gases on climate change is not a relevant consideration in deciding whether to grant resource consents for a fossil-fuel power station or a coal mine. By ignoring the dis-benefits of fossil-fuels, this legal framework inhibits the transition to a low carbon society.

We currently have emissions reduction targets without a web of policies to help achieve that target. We need to implement measures such as feed-in tariffs for renewable energy generation, emissions performance standards and targets to reduce emissions in the entire energy sector. We also need consistent laws. The purpose section of the Resource Management (Energy and Climate Change) Amendment Act 2004 is blatantly contradictory. It gives local authorities the mandate to plan for the effects of climate change but not to mitigate climate change itself. Commentators are not surprised that this flagrant incongruence would result in so much litigation in every tier of our court system.

What we need is a PLAN to reduce emissions. I welcome greater national guidance on the role of climate change considerations in local decision making. I encourage the implementation of a new National Environmental Standard that can give guidance on the role of climate change concerns in energy applications and on appropriate consent conditions. This NES can help create a national greenhouse gas regulation scheme that is actually effective at reducing emissions.

I encourage the Government to read my article published in the 2014 edition of the New Zealand Journal of Environmental Law. It is titled: climate change considerations in energy decision making: a comparative analysis.