

22 May 2015

Climate Change Consultation Contribution
Ministry for the Environment
PO Box 10362
Wellington 6143

Re: Christchurch City Council submission on New Zealand's climate change post 2020 target

The Christchurch City Council welcomes the opportunity to engage with the New Zealand Government on this very important and far reaching issue.

Key points for the New Zealand Government (Crown) to consider:

1. **Secure global commitments.** The Crown must be fully committed to the UNFCCC negotiation process at COP21 for adopting a protocol and other legal instruments, applicable to all parties that keep global warming below potentially harmful levels (2°C post-industrial temperature rise).
2. **Targets must be consistent with science.** 'Intended nationally determined contributions' (national emission reduction targets) must be grounded by scientific evidence and IPCC recommendations that an 80-95% reduction in global greenhouse gas emissions is needed by 2050. Therefore the Crown's objectives must be scientifically robust and consistent with science. The term 'ambitious' poorly reflects the robustness needed.
3. **Fairness is critical.** We agree that fairness / equity is a key objective for the Crown. Fairness between countries, across sectors and considering impacts on future generations is critical. Therefore, New Zealand's high per person emissions must be seriously considered (currently twice the global average). We believe that serious credibility issues will arise if our emissions and policies remain out of step.
4. **Long-term and certain.** We agree that taking a long-term view is needed and that successive governments must maintain momentum and adopt continual improvement approaches toward set targets and policy measures. For effective responses, business and communities will need certainty from the Crown before transformative decisions and investments are made. To support this a Government Policy Statement could be adopted that would seek all Government Departments to work toward common goals in relation to emission reductions.
5. **Cost and opportunity.** The Crown appears to be taking a very risk and cost focused approach to its community engagement on target setting. The many benefits of an innovative, efficient, resilient, knowledge based economy appear to be missing from the discussions. A more balanced approach considering costs and benefits (often displayed as an abatement curve) is needed to arrive at a meaningful national target and policies. Adopting a whole of government approach will also be vital in understanding and valuing these opportunities because the numerous benefits arise across our communities and economy, for example warmer homes, clean air, a healthier more active population, and a more resilient and competitive local economy.
6. **Very high cost of failure.** In considering how much to invest to avoid harmful climate change the Crown must also consider what is at stake, if local and global efforts do not transition in time to a low carbon and more sustainable future. The residential red zone in Christchurch overlays almost entirely to properties vulnerable to a future 1 meter rise in sea level. The Crown purchase of the 10,000 red zoned homes and land amounted to \$1.5 billion (excluding infrastructure and land rehabilitation). Multiply this across all the low lying properties in New Zealand and we have a significant incentive to avoid the worst of the

projected climate impacts. Put simply, New Zealand, and the international community can not afford to fail.


7. **Unconditional and conditional commitments.** We believe that the Crown could set two emission reduction targets to clarify our domestic comments and to encourage broader global agreements. The first unconditional target should reflect what is realistically achievable with strong domestic policies and approaches. The second and higher conditional target should be based on broader global agreements being reached and global mechanisms that would allow New Zealand to readily access international carbon markets. This would enable some flexibility should global agreements not be reached. This also reflects the reality New Zealand faces in reducing its emissions in a globally connected economy.
8. **Target setting.** We propose an unconditional target of 40% reduction by 2030 from our 1990 baseline and a conditional target of 50% reduction by 2030 from our 1990 baseline. This is broadly in line with many countries that currently have half the emission per person than New Zealand, and yet are still committing to reduce this amount by half (fairness). It is also broadly in line with the IPCC recommendations for a 2050 global emissions target (consistent with science).
9. **Key opportunities to explore.** New Zealand should build on areas where it already has leadership and excellence to make the most of our 'pure advantage.' Areas such as sustainable agriculture, forestry, bio-mass and renewable energy offer great promise for New Zealand both in terms of local innovation and as a knowledge export opportunity. Unlocking innovation through direct investment in research and development, collaboration and business incubation will be important, as well as greater access to international markets. Tools like the "Projects to Reduce Emissions" (PRE) programme were successful at unlocking further innovation. An example of this is the Council's 6 Greenstar office building (powered by landfill gas - a PRE project) that will now become a hub for a new central city district energy system. New Zealand will largely be receivers of, but must be ready for, other technological innovations such as electric vehicles, district energy systems and smart city technologies that can enable cities to better manage their emissions. Scoping study and value case for District Energy: <http://www.eeca.govt.nz/resource/christchurch-central-city-district-energy-system-information-report>
10. **Low carbon and active mobility investment is critical.** Christchurch is investing heavily in its public transport, cycling and walking infrastructure make the most of the social, economic and environmental benefits. The benefits of the proposed cycle network alone total more than \$1.2 billion over 40 years according to a recent business case (link below). Such investments will be vital throughout New Zealand and will deliver substantial health benefits and make a valuable contribution to emission reductions. However, greater investment from the Crown would unlock further benefits throughout New Zealand.
Christchurch City Major Cycleway Routes Network Business Case.
<http://www.ccc.govt.nz/cityleisure/projectstoimprovechristchurch/transport/cycleways/index.aspx>
11. **Whole of government low-carbon priority.** We note the domestic policy measures outlined in the MFE discussion document. However, relative to recent investments being made in large scale roading projects, oil exploration, and in propping up coal companies, it may appear that the Crown could be under investing in our low carbon, green, knowledge economy. Given the ambitious targets proposed by other counties the Crown may want to make low-carbon policies and approaches a whole of government priority so more consistency occurs across Government Departments. Government Policy Statement could be adopted that would seek all Government Departments to work toward common goals in relation to emission reductions.
12. **The need for education.** Growing an understanding in our communities about the potential impacts of climate change and the need for and ways to respond, will be crucial for the Crown to gain community support for an ambitious climate change mitigation, adaptation and resilience programme. Recent evidence would suggest a general lack of, or inconsistent understanding about climate change in New Zealand. Other countries have adopted more

proactive education approaches to good effect. Clarification of education roles and responsibilities for central and local government organizations would be a useful start (e.g. education, health, environment, business and civil defense organizations).

13. **Synergies between climate mitigation and adaptation.** Adopting low-carbon adaptation strategies will also be of vital importance as the effects of climate change are felt and responded to by communities. Long-term adaptation approaches must not exacerbate and add to climate change impacts by adopting energy and material intensive approaches. This presents distinct challenges when emission reductions and possibly large scale adaptation measures are required in a similar period of time. More support is needed to understand at a practical level how best to identify and implement low carbon adaptation solutions.
14. **Prevention is better than cure.** Adopting approaches that avoid emissions is the best way to respond to climate change. As Lord Stern clearly points out, the cost of avoiding emissions (prevention) is far far cheaper than only trying to adapt to the impacts. Based on IPCC and Crown reports many aspects of our global and local economy, society and environment will struggle to adapt if a business as usual approach continues. Doing nothing must not be an option. We have a moral and economic imperative to act now and must not let this chance to gain a global agreement go wanting. Acting collectively and decisively in Paris this December, is the best way to secure our shared future.

Thank you for considering our views.

Yours sincerely



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