To whom it may concern,

The Arctic is on fire, and is now suffering a heatwave. Greenland just lost 12 billion tons of ice in a single record breaking day. We are in a climate crisis. Every nation, every government has to act substantially and with urgency. For New Zealand that means real action to reduce agricultural emissions.

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The purpose of the 'Action on Agricultural emissions' consultation is for the Government to seek “views on how we can best take the necessary steps to address agricultural emissions.(1)” I believe the proposals presented in the discussion document are wholly inadequate to deal with our country's worst climate polluter. I propose the following recommendations that I believe will address agricultural emissions with the effectiveness and the urgency that's required:

1. End further intensification of the herd by banning new dairy conversions and any further livestock intensification
2. Halve the herd by setting a clear pathway to halve the number of cows farmed in NZ by 2030, including by:
   a. Introducing a maximum stocking rate limit of 2 cows per ha nationally
   b. Introducing a maximum stocking rate limit of 0 to 1 cows per ha in catchments with more porous soils.
3. Ban synthetic Nitrogen fertiliser
4. Stop the import of animal feed
5. Invest significantly in the uptake of plant-based regenerative farming

According to the IPCC scenarios that limit warming to 1.5 degrees require a reduction in agricultural methane emissions by 24-48% by 2030, relative to 2010 levels (2). Agriculture is NZ's biggest climate polluter, causing 49% of emissions (3). Between1990-2016, these emissions increased 12% (4). MfE states that: "This (increase) is primarily due to the national dairy herd nearly doubling in size since 1990 and an increase of over 600 per cent in the application of nitrogen-containing fertiliser during the same period." (5)

There are still new dairy conversions and livestock intensification occurring. This must be stopped. New Zealand must halve the herd by 2030. So far as current technology exists (on which we must base climate strategies, rather than hypothetical future technologies), reducing ruminant numbers is the only means of significantly cutting methane emissions. The PCE stated
in its report on the issue “It is axiomatic that the fewer sheep and cattle there are on a farm, the lower the biological emissions will generally be.” (6)

We must ban synthetic nitrogen fertiliser and stop the import of animal feed. These enable higher stocking rates thereby increasing methane emissions. According to the PCE: “The increased use of urea fertiliser has, along with irrigation and supplementary feed, enabled higher stocking rates.” (7)

In regards to the specific proposals in the discussion document:

1. I strongly oppose option 2 - The formal sector-government agreement.
2. I support option 1 - bringing agriculture into the ETS by 2021 at 5%, however:
   a. I would like to see the 95% subsidy eliminated, immediately
   b. I would like to see all timeframes brought forward to reflect the urgency of the climate crisis, specifically:
      − Price livestock and fertiliser emissions at the processor level by 2019.
      − Price livestock emissions at the farm from 2021.
   c. I want to see strict controls put on the recycling of funds back to industry
      − Funds should go to assisting with the transition to plant-based regenerative farming, and not into further futile attempts to find a technological silver bullet to allow intensive livestock farming to continue.
3. I want to see the agricultural industry's involvement in setting and enforcing of climate regulations reduced.

Allowing the agriculture industry to continue to operate outside of the ETS any longer would continue the unfair and distorted history of climate policy in NZ. At 5% it will only cost 1c per kg of milk solids (8). This is completely insufficient to drive any kind of on-farm or industry behaviour change towards lower emitting land use and land-use practices.

I am alarmed that the Government is proposing option 2 at all. I see this as further delay to action and the Government pandering to industry as it puts no regulatory or financial onus on the industry to reduce emissions. I am also alarmed by the amount of input the Government has allowed to the industry prior to this public consultation. I would like to see this involvement reduced in future.

REFERENCES


4. Ibid.

5. Ibid.


Sincerely,

[Name]

[Phone]

[Address]