Dear Sir/Madam,

We are very disappointed with the consultation document, and the Infometrics report that the document is based on. They are extremely inadequate as they state the costs of action but do not take into account the costs of climate mitigation that would arise from inaction, or the financial benefits of transitioning to a low carbon economy. In addition, the arguments the government makes as to why it cannot make a strong contribution are unacceptable.

Mitigating the effects of climate change will cost the government and New Zealanders. While the predicted cost of climate change mitigation has not been well modelled for New Zealand, some of the expected costs are: increased pressure on infrastructure from more frequent and severe flooding events, providing for climate refugees, health costs from increased spread of pathogens, and of particular pertinence to Christchurch and Canterbury, the loss of land and infrastructure from sea level rise, and the effect of increased drought events on farming (IUCN Fifth Report).

The benefits of transitioning to a low carbon economy have been predicted to have positive economic impacts. The 2013 ‘The Future is Here’ report by the Technical Thermodynamics of the German Aerospace Centre found that there would be substantial economic and employment gains by New Zealand providing all of its energy from renewable resources by 2050. Not only would this decrease our emissions by around 45%, it would create a $150 billion high
value-low carbon export economy by 2025, create over 25,000 jobs, reduce the cost of electricity by $600 million, increase our energy security and make our economy resilient to future oil price shocks.

Not including the costs of climate mitigation or the benefits of transitioning to a low carbon economy into the Government’s analyses means that we are not able to make a well founded decision on what our climate change target should be.

Regardless, from the results of the Infometric modelling alone, New Zealand should commit to a 40% reduction in emissions below the 1990 level. The discussion document makes it sound like commitment would bring unfeasibly large detrimental effects to our economy and household consumption. In contrast, the results from the Informetrics report show that reducing our emissions by 40% would only decrease GDP by 1.1%, RGNDI by 1.7% and household consumption by 2.1% compared to the business as usual estimates. These figures are only 0.2 to 0.7% greater than decreasing our emissions by 5%, which we have already committed to under the Kyoto Protocol. Given the expected costs of climate change, this is a very small price to pay.

In addition to the economic impacts of climate change, we have an obligation to our Pacific protectorates (Cook Islands, Niue and Tokelau) and neighbours to be a strong leader in climate action. As a resident of New Brighton we know that my community will be gone within a hundred years due to sea level rise. But we have the luxury of being able to move inland a kilometre. We can barely conceive how it must be for our pacific neighbours that know their entire country may be uninhabitable within the next century.

The rationales that the government have given as to why New Zealand cannot make a large contribution to reducing carbon emissions are flawed and weak – little more than excuses.

The first rational is that because New Zealand already has one of the highest levels of renewable electricity generation in the world we have less potential to reduce emission further in this sector. While this is true, we also have the benefit of living in a country where creating all of our electricity from renewable sources is entirely feasible, and as mentioned before, economically sensible. Therefore, by committing to creating all of our electricity from renewable resources we could reduce our emissions by 22%.

The next rational is that New Zealand cannot reduce its agricultural emissions because the world needs more food. Yes the world needs more food, but it doesn’t need more dairy and meat. These are luxury items for the rich that use land and resources that could grow higher productivity crops such as grains and vegetables that also emit less carbon. Therefore, if New Zealand is committed to helping reduce the world food shortage it can accomplish this at the same time as reducing its carbon emissions by transitioning from dairy and meat to vegetable and grain crops. In addition, the sector most vulnerable to climate
change is agriculture. Therefore to protect our future agricultural profits we must commit to reducing carbon emissions.

The third rational is that we cannot set too hard of a target now as that could make life difficult for future governments. Given the substantial negative effects of inaction on climate change we predict the government of 2025 would rather be in charge of making sure we meet our target as opposed to paying for the cost of climate mitigation. In addition, the purpose of governments is to lead. So we challenge you to take true leadership on climate change. Future governments can follow in your footsteps.

The fourth rational is that we do not know what technologies will exist in the future, thus it is difficult to set a target. While this is true, we cannot continue to sit around waiting for a silver bullet. It may never come. The effects of climate change will. As we mentioned previously, we currently have sufficient technology to reduce our carbon emissions by more than 40%. While we may not have one bullet, we have plenty of shot. Also, by setting an ambitious target we are incentivising these very technologies rather than simply waiting for them to materialize.

The final rational is that due to our low population density we need to have high levels of personal vehicle transport. ‘The Future is Here’ report outlines how we could realistically achieve a 96% oil free road transport system by 2050. This would involve greater use of electric and biodiesel public transport, electric and hybrid vehicles, and prioritising rail and boat freight over road freight. New Zealand is in an excellent position to produce energy for transport through both electricity from renewable energy sources and biodiesel from forestry waste. In addition to reducing emissions by 17% it would save New Zealand $7 billion in oil imports, create over 20,000 jobs, increase our carbon sinks by planting more trees, and make our economy resilient to oil shocks.

To me it seems like New Zealand has a lot to gain from transitioning to a low carbon economy, and potentially everything to lose from not doing so. Therefore, in conclusion, we call on the New Zealand government to:

- Commit to reducing its domestic carbon emissions to be 40% or more below the 1990 levels by 2025 and commit to zero domestic carbon emissions by 2050 without the use of international carbon credits. This is the minimum estimated contribution required to keep us under 2 degrees of global warming. In addition, as New Zealand is a highly developed nation, we ask the government to commit to reducing their emissions by a further 10% each period (therefore a total of a 50% reduction by 2025 and a 120% reduction by 2050) through carbon credits to support developing countries in reducing their carbon emissions.
To succeed in reaching this commitment we ask the government to:

- Commit to creating all of our electricity from renewable resources by 2025.
- Commit to providing 50% of our transport energy from electricity and locally produced biodiesel by 2025 and 100% by 2050.
- Set a moratorium on the number of cows in New Zealand as well as subsidies for transitioning to low-emission agriculture such as forestry, grains, fruits and vegetables.
- Create direct financial incentives for clean technology and innovation. As part of this, we ask the government to create a Green Investment Bank that directs public funds into green infrastructure. Such initiatives have been very successful elsewhere (Organisation for Economic Co-operation and Development (2011), Towards Green Growth).
- Create energy efficiency incentives.
- Set up an independent Climate Commission such as exists in the United Kingdom. This makes the issue of climate change less politicised by having an authoritative independent voice in the debate.
- Create a New Zealand Climate Change Act (such as already exists in the United Kingdom) that puts national emissions targets in domestic law and requires every government to produce credible plans and follow them. This will show other countries that we are serious. As part of this, the Resource Management Act needs to be amended to require consideration of the effects of proposals on climate change.
- Create a cross-party climate working group to create stable climate policy that will not change every time there is a change in government. Climate change is a problem that will take more than a three year term to fix and will affect everyone for their entire lives. Creating solid climate policy will also allow businesses to make long-term decisions and therefore attract investment in low-carbon industries and innovation to New Zealand.
- Remove all subsidies and financial incentives to oil, gas and coal exploration and extraction and plan for the closure of all NZ coal mining operations as each one reaches the end of its current consent.
- Stop funding high carbon emitting initiatives such as the Roads of National Significance and instead directs this money towards creating a green economy.
- Create a ‘Fee and Dividend’ scheme to replace the Emissions Trading Scheme (ETS). The current ETS has done very little to decrease global carbon emissions and has created a financial carbon trading industry that that the public is paying for. A ‘Fee and Dividend’ scheme would be much more functional as it would make polluters pay a fee that goes directly to the public and would create a greater monetary incentive for polluters to reduce
their emissions. To be successful a ‘Fee and Dividend’ scheme must include all economic sectors, including agriculture. If any sectors are excluded from the scheme innovation towards reduced emissions will not be economically forced, therefore reducing the success of the scheme.

- Reduce our secondary emissions as well as our primary emissions. To make a substantial decrease in worldwide carbon emissions we must create policy that not only decreases the emissions that we produce here in New Zealand, but also the emissions that are produced overseas as a result of the products we buy or other business that we are involved in. For example, New Zealand should refuse to import products that cause deforestation.

we thank the government for the opportunity to submit on this important issue. To achieve the goal of the public consultation process we ask that submitters are given the opportunity to give their submissions in person after the submission closing date, with at least two weeks notice for each hearing. Due to the very short time frame between being given notice of the consultation and the date of the public meetings, many people were unable to make well founded conclusions as to what they believe should be New Zealand’s post 2020 climate change target by the time of the public meeting. For the government to fully understand what New Zealanders believe on this issue, the public must be given more time to be heard.

Sincerely,

Terra Dumont & Matt Hanson