Environment Network Manawatu Incorporated
Submission to MfE on setting New Zealand’s post-2020 climate change target

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Thank you for this opportunity to submit on climate change targets. Climate change is one of the most pressing issues of our time and this consultation is the first step of many that will need to be taken to properly address this issue.

About ENM
Environment Network Manawatu (ENM) is a charitable umbrella organisation dedicated to enhancing the Manawatu environment. We currently have 44 active group members\(^1\), based in Palmerston North and the wider Manawatu area. This submission has been written and revised to incorporate feedback provided by our member groups.

Comments on the submission process
We are disappointed that the consultation period has been very short and poorly advertised in our region, and that a public meeting was not scheduled for Palmerston North as part of the consultation process. In fact, there were no consultation meetings held that were easily accessible to most of the population living in the middle of the North Island and we submit that this is a large area of New Zealand that has potentially been excluded from having their say about these issues. This area also represents a large proportion of agricultural land, and given that there is a focus on the agricultural sector throughout the discussion document, we believe this was a serious oversight. We request that any further consultation that is carried out with regard to climate change provides a forum for public input at a range of regional population centres.

General comments
We are concerned that the submission document does not comprehensively address the issues surrounding the cost of climate change. The document appears to concentrate on the view that any action to mitigate climate change will be too expensive to carry out, and as such the consultation questions are focused around whether people view that this cost is too high. We submit that it is impossible to assess whether the cost of change is too high if no information has been provided on the costs society will face - economically, environmentally and socially - if no action is taken. The costs of climate change, if left unchecked, will make it increasingly difficult to be able to afford adaptation, let alone mitigation, because it will depress economic activity. And the longer it is left before acting, the more expensive it will be to change our systems to cope. This was a point made

\(^1\) Our member group Landcare Trust has a formal, blanket “no submissions” policy and is not represented by this submission.
clearly by Nicholas Stern in his 2006 landmark report The Economics of Climate Change, and the US Council of Economic Advisers in their 2014 report on the costs of delay\(^2\).

The cost of climate change action is far less than the cost of failing to take action. 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 now, the more we will reduce this cost. We need to change current thinking to reflect that taking climate change action now is actually an investment in our future and our children's future, rather than a cost that we cannot afford.

Climate change is a threat to our economy and the things it most depends on, like tourism and farming. Our agricultural nation depends on a stable climate. Farmers will suffer increased droughts and damaging storms and profits will suffer. These costs are not reflected in the consultation document, even though they are more significant than the costs of reducing our emissions. In addition, the document overlooks the financial and job creation opportunities that moving towards a low emissions future would bring.

**Requested targets and actions**

We ask the Government 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.

We also request that in addition to committing to a target, the Government commits to developing a tangible action plan that demonstrates that New Zealand will take climate change seriously. Below are some examples of actions and other targets that the Government needs to seriously consider as part of that plan. In evaluating these and other potential actions the government needs to 1) work constructively with other political parties, and with New Zealanders in general, and 2) take a whole of system approach in which any trade-offs become transparent.

- The development of credible, transparent, cross-party plans, with a legislated, independent Climate Commission to ensure NZ meets its targets and stays within the global carbon budget.

- Commit to a pathway towards 100% renewable electricity in the near term, including shutting Huntly coal and gas fired power station

- An immediate moratorium on fossil fuel exploration, and pledge to phase out existing extraction within the decade.

- Phase out all subsidies for fossil fuels like coal and deep sea oil drilling

- Put a levy on carbon emissions that could be used to fund mitigation or public transport. At least put some value on carbon, so that we can track it and be aware of our use.

- Develop a low carbon action plan to ensure that by 2050 all areas of energy (electricity, heating, transport and industrial use) come from clean energy sources instead of fossil fuels.

- Reform the electricity markets by guaranteeing priority access to the grid for renewable power generators.

- Shift the unnecessary $12 billion road building programme to investment in smart rail and

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http://www.whitehouse.gov/sites/default/files/docs/the_cost_of_delaying_action_to_stem_climate_change.pdf
public transport infrastructure.

- Prioritise the import and infrastructure needs (e.g. fast charging points) for hybrid and electric vehicles.
- Make the Emissions Trading Scheme more stringent so that it works, enabling industry to move away from polluting energies.
- Implement policies to incentivise ‘low input’ farming methods that are proven to reduce pollution and increase farming profits.
- Prioritise geothermal projects to realise opportunities for our geothermal industry to capture a sizeable share of the growing global geothermal market, potentially worth billions in export dollars. NZ already has well recognised expertise in geothermal technologies. The potential lies in strategically building on that expertise and developing more geothermal energy projects in other countries. Actions to support this include greater investment in geothermal R&D, in relevant science and engineering training and the prioritisation of geothermal projects in international trade negotiations.
- Promote New Zealand as an international centre of excellence for developing and trialling ocean energy technologies.
- Include health, fairness, and the true costs of inaction on climate change in the assessment of costs and benefits
- Abide by the articles laid out in Te Tiriti o Waitangi
- Follow a transparent decision-making process after the consultation process ends

Without a real action plan to reduce climate pollution, the Government risks damaging our global reputation and wrecking our economy. But most importantly, they are denying New Zealanders the cleaner, smarter, healthier and safer future that we all deserve.

Yours sincerely

Beth Tolley
Deputy Chair
Environment Network Manawatu Inc