

Setting New Zealand's post-2020 climate change target

Submission form

The Government is seeking views on New Zealand's post-2020 climate change contribution under the United Nations Framework Convention on Climate Change (UNFCCC).

You can have your say by making a submission using this form or using the online tool available at www.mfe.govt.nz/more/consultations.

For more information about this consultation:

- Read our [Consultation on New Zealand's post-2020 international climate change contribution web page](#)
- Read our discussion document: [New Zealand's Climate Change Target: Our contribution to the new international climate change agreement](#)

Submissions close at 5.00pm on Wednesday 3 June 2015.

Publishing and releasing submissions

All or part of any written submission (including names of submitters), may be published on the Ministry for the Environment's website www.mfe.govt.nz. Unless you clearly specify otherwise in your submission, we will consider that you have consented to website posting of both your submission and your name.

Contents of submissions may be released to the public under the Official Information Act 1982 following requests to the Ministry for the Environment (including via email). Please advise if you have any objection to the release of any information contained in a submission and, in particular, which part(s) you consider should be withheld, together with the reason(s) for withholding the information. We will take into account all such objections when responding to requests for copies of, and information on, submissions to this consultation under the Official Information Act.

The Privacy Act 1993 applies certain principles about the collection, use and disclosure of information about individuals by various agencies, including the Ministry for the Environment. It governs access by individuals to information about themselves held by agencies. Any personal information you supply to the Ministry in the course of making a submission will be used by the Ministry only in relation to the matters covered by this consultation. Please clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that the Ministry may publish.

Questions to guide your feedback

Your submission may address any aspect of the discussion document, but we would appreciate you paying particular attention to the questions posed throughout and listed in this form. You may answer some or all of the questions. To ensure your point of view is clearly understood, you should explain your rationale and provide supporting evidence where appropriate.

Contact information

Name	Ian A Flux
Organisation (if applicable)	n/a
Address	████████████████████
Telephone	████████
Email	████████████████

Objectives for the contribution

1a. We have set the following three objectives for our contribution:

- **it is seen as a fair and ambitious contribution – both by international and domestic audiences**
- **costs and impacts on society are managed appropriately**
- **it must guide New Zealand over the long term in the global transition to a low emissions world.**

Do you agree with these objectives for our contribution?

Yes

1b. What is most important to you?

That the NZ contribution is seen as not just “fair” but as world-leading. The only way NZ can make a real difference in addressing this urgent global issue is by leading the world by example. We can make a difference that is disproportionate to our size.... By placing ourselves at the forefront of change we might expect to be well positioned to benefit in a post-change economy.

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 think NZ and the world need to be more careful in how they discuss and measure up contributing emissions. I think we need to acknowledge 2 classes of emissions; **Primary emissions** (= emissions which release *NEW* carbon into the biosphere from previously stable (fossil) sources. This category would include all newly extracted fuel sources (oils, gasses, coal) as well as sources such as limestone (Calcium carbonate) which is being used in increasing quantities on NZ farmland where it breaks down with soil acids to release carbon di-oxide and simultaneously may reduce soil- carbon). **Secondary emissions** (which cycle carbon at different rates by releasing carbon-dioxide or methane from solid carbon forms already present in the biosphere. Examples are burning of wood, milling or planting of forests, natural emissions of animals)

This distinction is critical if we are to make a meaningful long-term contribution to reducing the severity of anthropogenic climate change. **New Zealand's foremost goal should be to rapidly reduce primary emissions** – and these are essentially related to transport, industry, energy and waste. The agricultural carbon-dioxide emissions associated with liming of pastures needs quantification, and should be included in reduction targets.

Domestic animals cannot create carbon, they cannot emit more carbon than they eat. The carbon which animals ingest has been fixed (captured from the atmosphere primarily) by pasture during the past few weeks of growth. Such “emissions” represent very short duration cycling of carbon within the biosphere and cannot greatly influence long-term levels of atmospheric carbon-dioxide.

Commercial (softwood) forestry represents a longer cycle, 30-100 years (depending on the end use of the timber). Again however this industry is cycling carbon within the biosphere and making little difference to long-term atmospheric carbon trends except through their use of fossil fuels throughout the planting, transport, processing and distribution sector. ***Planting of softwood (commercial forestry) should never be accepted as an offset against releases of primary carbon emissions .***

NZ, together with other “western” nations, tend to shun responsibility for carbon (and other pollutants) emitted on our behalf by the nations which manufacture for us. New Zealand no longer manufactures much, so we no longer account for the manufacturing emissions – yet we consume more than ever, so we continue to drive up emissions in China and elsewhere. Nations need to agree to accept responsibility for the environmental cost (including emissions) of imported consumables. These emissions are not represented on current carbon balance sheets (eg figure 2 of discussion document) yet these are emissions which we ARE responsible for and which we can act toward reducing. It is ludicrous that a NZ manufacturer can set their NZ emissions to 0 simply by moving production offshore.

Increasing human populations are ***the major factor driving increasing primary emissions of carbon.*** It is time NZ reopened public discussion of limiting population growth by reducing family sizes and increasing generation length.

Increasing consumerism is another leading driver that it appears no-one wants to discuss. Virtually all consumer products have a carbon cost which could be readily calculated.

There is currently no way that NZ will meet its Kyoto target of 5% reduction of emissions from 1990 levels; to suggest otherwise (pg 11 discussion document) is disingenious at best. Again I stress that we need to be discussing the emissions which really count – primary emissions – the document notes an increase in road transport.... We can do something about that. “Balancing” our increasing emissions with forestry and international carbon credits does nothing to solve the issue – this is simply fueling a subsidiary bullshit economy.

Waste reduction is another key area of the carbon budget where government/local government regulation could be used to create significant emission reductions.

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 do you think would be a reasonable impact on annual household consumption?

We are currently living in an unsustainable manner, fueled by a low cost of fossil fuels which in no way reflects their true cost to the planet or our own long-term wellbeing. We need to expect costs to increase as fossil fuels get scarcer and the environmental costs continue to increase and begin to be accounted for. NZ can't afford NOT to make changes. It should not be so much about what NZ can afford –rather we need to face up to the true cost of making real change within the timeframes suggested by the Intergovernmental Panel on Climate Change. If we don't make changes now the future costs will be even greater.

If we shift the focus to primary vs secondary emissions we see that our primary emissions per person are similar to the global average..... but if we take out commercial forestry (as opposed to permanent forest sinks) as an appropriate mitigation action this again increases the costs of mitigation which NZers should take responsibility for. Since 1990 NZ has largely been business as usual, successive governments have failed to tackle the issue.... And consequently costs of reaching these targets have escalated. We need to act now and act realistically.

I do not think we should be using international carbon markets to reduce our emissions budget – it is most important that we take responsibility for our own actions and invest in changes which will lead to real reductions in primary emissions in NZ. Trading on international carbon markets simply fudges the issue. It is very difficult to gauge the veracity of the emissions reductions claimed by some market schemes – the carbon market is certainly the subject of a great deal of corruption, deceit and mismanagement.

I would like to see NZ take on an ambitious target of perhaps 30-40% reduction of emissions (concentrating on primary emissions) by 2030. Costs should reflect consumption, but should primarily be borne disproportionately by wealthier NZers, business and industry.

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?

If NZ takes a world-leading stand on climate change and takes on ambitious emissions reduction targets I think this will position us well in the future economy. I think there are huge marketing opportunities if we can drive down primary emissions associated with NZ produce.

- Increase use of biofuels, electric vehicles or other low-carbon machinery in agriculture.
- Increase the area of NZ in permanent forest sinks (native forest species which are longer lived and store carbon at greater density than softwoods) NB Species such as rata and rewarewa store carbon at densities of around 4x that of *Pinus radiata*. Mixed species, indigenous forests have far greater ecological complexity, greater resilience (less likely to burn or succumb to disease) and support higher densities of carbon per hectare – this is not currently reflected in the permanent forest sink initiative. Too much influence from forest industry!
- Promote and expand the use of rail transport for produce and freight and electrify wherever possible.
- Consider a government investment in a modern fleet of large sailing/solar vessels to transport non-perishable (frozen) goods internationally.
- Consider government subsidies to encourage electric vehicles and required charging infrastructure.

Government can also be influential in;

- encouraging smaller family sizes,
- ensuring that imported consumer products meet high standards of durability and energy efficiency,
- reduce transportation of goods by supporting buy-local principles.
- Reduce the number of private commuters by considering greater use of technology (working from home or from local office/business hubs).
- Reduce use and availability of plastics, consider an importation tax on plastic packaging and non-durable items.
- Encourage tourists back into buses rather than allowing/promoting the proliferation of private hire vehicle fleets.
- Don't rest on our laurels with 80% renewable energy, we can still increase investment in renewable sources.
- Incorporate city-commuter cycleways in all major cities.
- Reduce investment in roading infrastructure projects.
- Work with local government, industry and importers to reduce waste at source (eg regulate against excessive packaging).

Summary

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

We can minimise the uncertainties by investing here in NZ on **REAL** mechanisms which will reduce our **PRIMARY** carbon emissions. Our large investment in agricultural emissions seems disproportionate to the actual atmospheric impact of short-term carbon cycling – this investment should be reconsidered.

Other comments

6. Is there any further information you wish the Government to consider? Please explain.

Ultimately addressing carbon emissions means facing up to the true costs of using fossil fuels. We have developed our nation on the back of what seemed to be cheap access to fossil fuels. We now need to face up to the true costs – this may mean reshaping our society and the way it does business. Globalisation of international production and marketing is a major contributor to carbon emissions.... Less trade, more local manufacturing and a more self-sufficient economy would certainly reduce our per-capita emissions.

We need to be particularly careful that trade “deals” such as the TPP do not trap us into these old business models and lock us into trade which we really do not need.

This is not just about carbon..... this planet is a finite space with finite resources. We need to learn that “sustainable growth” is an anachronism. No type of growth is not sustainable, everything has limits. Governmentst simply need to face up to the realities of the world we live in sooner rather than later so that we can minimise the costs to ourselves and our planet. This means planning for a stable economy rather than for growth..... what we take from the planet we must account for and return.

When your submission is complete

Email your completed submission to climate.contribution@mfe.govt.nz or post to Climate Change Contribution Consultation, Ministry for the Environment, PO Box 10362, Wellington 6143.

Submissions close at 5.00pm on Wednesday 3 June 2015.