3 June 2015

SUBMISSION IN RESPONSE TO MINISTRY FOR THE ENVIRONMENT’S CONSULTATION ON SETTING NEW ZEALAND’S POST-2020 CLIMATE CHANGE TARGET

1. Forest & Bird is New Zealand’s largest and oldest independent conservation organisation, with more than 50 branches nationwide and 80,000 members and supporters. Forest & Bird works to preserve New Zealand’s natural heritage and native species.

2. For present purposes our focus and key concern is on the direct risks, which are major, to New Zealand’s biodiversity from climate change, as well as associated secondary risks to NZ’s social, environmental and economic interests from biodiversity loss.

3. In addition to the many and devastating ways in which climate disruption will impact on humans, Forest & Bird is concerned to ensure that the very significant impacts on biodiversity both in New Zealand and globally, are prioritised when the Government considers and decides on the position it will take at the Paris 2015 COP.

4. Biodiversity loss has human and economic impacts. It will affect, for example, soil and ecosystem health, ocean health, tourism, agriculture, horticulture and fisheries. It will have reputational impacts arising from NZ’s unique biodiversity status and international commitments to protect biodiversity.

5. Our submission requests urgency, action, and a focus on the positive opportunities for New Zealand. We consider that the consultation process and analysis has been inadequate and flawed. All countries will need to decarbonise, and need to do so sooner rather than later. The question is not whether, but how, we can achieve this with the urgency required, at lowest cost. The longer New Zealand delays, the more costly for us in every respect - social, economic and environmental - it will be.

   Background: New Zealand’s existing commitments and the global carbon budget

6. The starting point is that the New Zealand government has agreed to:

   i. establish clear objectives for reducing human-generated greenhouse gas emissions over time to keep the global average temperature rise below two degrees, and
ii. encourage the participation of all countries in reducing these emissions, in accordance with each country’s different responsibilities and capabilities.

7. To have even a 66% probability of keeping below two degrees of global average temperature rise (accepted as the dangerous level, sufficient to trigger permanent climate-changing tipping points), the world according to the IPCC needs to keep within an all-time carbon budget of 790 billion tonnes of carbon (GtC) or 2,900 billion tonnes of carbon dioxide (GtCO2). Fig 1 on p6 of the discussion document refers.

8. At current emission rates, the world will exceed that budget by 2035. As at 2011 we had used 515 billion tonnes carbon (~2/3 of the aforementioned budget, also mentioned in Fig 1); carbon emissions in the subsequent four years have of course continued to rise. As at 2011 this left 275 GtC remaining: that is, a remaining global budget in 2015 that is now less than 1,000 billion tonnes CO2 that the world can emit, forever.

*The consultation process and document*

9. The focus of the consultation document, and the incomplete economic modelling supplied, are the opposite of the focus sought by Forest & Bird on action, urgency and opportunities.

10. The consultation process has been inappropriately brief and poorly resourced, considering the importance of the issue and relative to other issues (eg, $26m investment in a one-year process to debate NZ’s new flag). While it might be thought that urgency requires brevity: if the targets were indeed to be nationally (with a little ‘n’) determined, we should have started earlier.

11. The discussion document says, more or less, that emissions reduction in New Zealand is too expensive, too difficult, and more costly compared with other parts of the world. Credible evidence to support these assertions is not provided. No attempt is made to seriously assess the emissions reduction potential in different sectors. While the need for a global carbon budget is acknowledged in the consultation document, options are not presented and discussed in the light of it – ie, what is required to have a good chance of staying within 2 degrees warming and avoiding catastrophic climate disruption. If global emissions were to peak today, they would need to start falling at 5.5 per cent per year from tomorrow, in order to stay within a two degrees budget.

12. We are concerned with flaws and gaps in the economic modelling, eg, no analysis of information about the economic and social costs of climate change, no attempt to assess the co-benefits of taking action to reduce emissions, such as reduced water pollution from more riparian tree planting, lower costs and health benefits of active transport and energy efficiency, greater resilience through energy independence for NZ and consumers. While it has been claimed that,
for example, a 40% reduction target by 2030 would be “disastrous” for New Zealand’s economy, according to the government’s own analysis by consulting firm Infometrics: a 40% target (compared to no target) would cut annual GDP growth from 2.2% to just 2.1% - that is 0.1%.

What we want

13. We call on the NZ government to actively commit, first, to the following general targets or goals in climate change response policy of **decarbonising energy** and maximising **environmental carbon sinks** (eg, trees, healthy oceans, soils). We suggest more focus on indigenous forestry/land cover for carbon sinks, and strategies (such as pest and predator control) for sequestration - not just reliance on plantation forestry, which apart from anything else, has cyclical peaks and troughs and can be a liability as well as an asset.

14. This consultation is about specific INDC (Intended Nationally Determined Contribution) emissions reduction targets. But when NZ is lacking in its plan to achieve any decarbonisation at all (as shown by emissions projections which are projected to continue to rise, and focus on fossil fuel exploration), then the specific INDC target is just a distraction from the real issue: that NZ is travelling in the wrong direction on climate change policy, and lacks a decarbonisation plan.

15. IPCC projections provide clear information but beyond that, the government in its consultation materials has simply not provided the information necessary to make the calculations that would inform a judgement about what is an appropriate target. But whatever target the New Zealand government proposes and whatever methodology is used to account for emissions, the critical issue is a short, medium, and long-term plan towards total decarbonisation, as soon as possible.

16. Forest & Bird wants New Zealand to call for a **global** zero carbon target not later than 2070 in line with IPCC recommendations, and walk its own talk by committing to a pathway towards **zero CO2 emissions for New Zealand by 2050** (alongside reductions in other greenhouse gases). We should seek to achieve this, in the first instance, through a target of a **fossil-fuel free New Zealand**, that is, **100% clean renewable energy by 2050**, for transport as well as electricity and, to the extent possible, industrial energy. Coal needs to be phased out by 2030, fossil fuel subsidies removed and carbon-emitting industries priced / regulated to reflect their true cost. Forest & Bird is concerned with the current emphasis on fossil fuel exploration, with its all-round environmental risks, as opposed to new clean energy technology. A strategy for agricultural emissions could usefully focus in the first instance on nitrous oxide.

17. To repeat: targets need to be backed up with a credible plan. In order to meet our targets and for the sake of our international reputation, we need a credible national strategy for how we can achieve them. Without a clear pathway, targets are just empty numbers. Despite existing targets
previously set by this government for 2020 and 2050, New Zealand’s emissions have continued to rise. Official projections say they will continue rising under current policies.

18. That plan needs to start with policy changes that will start cutting New Zealand’s emissions, during this term of government.

19. From these commitments and plans, our formal statement for the INDC can follow. Whatever commitment is made, Forest & Bird requests that it is science-based, and set in the context of the global carbon budget and zero carbon target. **We do not see that a commitment of less than 40% can be acceptable** - noting that if this were the target, we would be setting it 10 years later than the 2020 target previously identified as necessary, and that this would put us on at least a reasonable path towards 100% for NZ by 2050. **We reject** the inference in the consultation document that it is harder for New Zealand to reduce carbon emissions than other countries, and that we are justified in doing less than other countries and urge the government to set ambitious emissions reduction targets that are consistent with the latest science on what needs to be done to ensure (not just gamble on a 66% probability) that global warming is halted as far below 2 degrees as possible or, failing that, that all governments are working together in the collective interest, to minimise it as much as possible with the greatest possible urgency and speed.

20. We do not support an approach which assumes that a large portion of New Zealand’s emissions reductions will be purchased internationally rather than achieved in New Zealand, given New Zealand’s ample capability and robust strategies to do so.

21. Forest & Bird calls on the government to establish a cross-party climate working group, to work towards a Climate Accord. We recommend a new structure for oversight and development of climate regulation and policy, by an independent Climate Commission.

**Biodiversity and climate change**

22. A research paper produced for the Department of Conservation on the potential effects of climate change on New Zealand’s terrestrial biodiversity describes the impacts on New Zealand’s biodiversity of climate disruption, including:

   i. Significant effects on indigenous terrestrial birds and bats.

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ii. Reduced abundance or access to marine food for seabirds – New Zealand is the most significant area globally for seabird biodiversity.

iii. Varying impacts on reptiles - tuatara sex ratios will potentially increasingly tilt towards males due to rising temperatures (this has already been observed on one of their major island refuges).

iv. Major responses in indigenous invertebrates to temperature change and a greater abundance of insect pests.

v. Impacts on non-migratory freshwater fish species, which cannot use marine pathways to access new freshwater systems. Many freshwater invertebrates (which are in turn a food source for freshwater fish and birds) have low thermal tolerance. As glaciers vanish and alpine streams warm, alpine mayflies may suffer reduced ranges and local extinction. New Zealand’s lowland and eastern freshwater ecosystems are already under considerable pressure from deforestation, abstraction and pollution, and climate change and drought is likely to exacerbate those pressures.

vi. The potential for “mismatch” between the climate envelope for plant species and their current distribution, and the potential for abrupt and/or indirect impacts such as cold-related damage and death of indigenous trees, shrubs and herbs, and increased loss to forest fires.