

# 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](http://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](http://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.



It is very important that governing elites and major international organisations lead by example as the public is sceptical of the hypocrisy exhibited by those requiring others to make sacrifices for climate change.

It is important that any concrete actions suggested are doable by the wider public and encouraged by positive promotion and reward rather than punitive taxation and dubious international carbon trading schemes.

Any target New Zealand agrees to should be fair and consistent with all other participant nations and not be ambitious for the sake of political grandstanding.

## 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?**

Target-setting (if any) should take account of the benefits of climate change as well as the potential costs. Most analysis of the consequences of potential climate change looks only at the effects on the people and activities that will be disadvantaged by warmer temperatures. Proper consideration needs to be given to those who will benefit and therefore the costs of having lower temperatures than would otherwise result.

Even to the extent that some parties are worse off with higher temperatures, and there will be some, there may well be lower costs in adapting to those temperatures than in taking actions to prevent them. There should be more effort put into encouraging positive adaptation than the continual scare-mongering which is rapidly losing credibility.

## 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?**

In order to maximise public acceptance the costs should be as low as possible. The achieving of any target should focus on the positive benefits of adaptation rather than the negatives of higher compliance costs being imposed. For example, rather than children being driven to and from every venue, they would be better off walking or biking for reasons that go well beyond the reduction of greenhouse gas emissions that would result.

### **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?**

As noted above, reducing emissions is not an end in itself and may actually be a disadvantage when taking into account the benefits as well as the costs of climate change.

Reducing energy inefficiency will always be a benefit if it can be achieved for a lower overall cost. Improved efficiency won't always be a benefit, for example replacing a vehicle which covers only a small distance on an annual basis may be cheaper to continue being inefficient than incurring the costs of replacement with a new electric vehicle.

Greater encouragement should be made for less commuting, more promoting of localism, greater use of IT technology and the encouragement of sharing and cooperation of resource use particularly by government agencies who need to lead by example.

Electric vehicles should not be excluded from road user charges as road user charges are largely to pay for the upkeep of roads, the costs of congestion and ACC. All of these are costs incurred equally by electric vehicles as petrol or diesel ones. Electric vehicles already avoid paying for petrol so already benefit to the extent that taxes are included in petrol prices.

## Summary

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

The statement "We need to ensure that our target is considered fair and ambitious" on page 17 of the discussion document pre-judges the consultation in Question 1. The Ministry for the Environment should take into account the costs and benefits of both higher and lower carbon emissions and resulting temperatures and acknowledge that there is a benefit in not setting a target at all. This means the use of the word "need" is quite inappropriate.

It is not possible to meaningfully take into account the effects of future technology as it is by definition unknown. There could be huge advances in solar and battery technology that makes these a very cheap way of substituting fossil fuel energy. There could be huge advances in agricultural technology that substantially reduce greenhouse gas emissions for the same level of output. Conversely there could be few changes in these but a range of key inventions that require fossil fuels or other carbon emissions but which deliver such material benefits to the population that we should clearly implement them despite an impact on carbon emissions. Technological change may substantially reduce the costs of adaptation while making few improvements in reducing the costs of emissions.

The best way to account for this significant uncertainty, if it is still desired to set a target, is to set a target that assumes there will be no improvements in reducing adaptation costs and there will be no new benefits identified from a warmer climate or higher greenhouse gas concentrations. This would then allow the target to be adjusted downwards appropriately if any such benefits were to arise in the future as a result of technological change. Such an approach would give the public greater confidence that this is not simply a tax-and-control approach to be applied regardless of any changes in the climate.

## Other comments

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

None.

## **When your submission is complete**

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

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