

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	Esther Henderson
Organisation (if applicable)	Factotum
Address	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]

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

No

Before I proceed any further I am going to answer question six because it impacts on my other answers. Without my comments in this section my other answers will not make sense.

I am absolutely disgusted with the quality of the consultation document. A consultation document should be balanced in its discussion, otherwise it is merely propaganda pushing one viewpoint. Right from the first sentence of the foreword it is biased. It is a matter of opinion as to whether '*climate change is a truly global problem.*' I agree that climate change occurs. But I totally disagree with the IPCC that there is 95% confidence that it is at least 50% caused by humans. If humans have no significant effect on the climate then it is pointless wasting quadrillions of dollars trying to change it. The amount of warming projected by the IPCC is totally dependent on the 'climate sensitivity'. This is the amount of warming that occurs from doubling carbon dioxide levels in the atmosphere. The IPCC set this sensitivity high due to their belief that many feedbacks occur to amplify the direct warming from carbon dioxide. There is no direct empirical evidence that these exist, let alone to the extent

the IPCC claims. I note that the IPCC has reduced this climate sensitivity in its most recent report, the AR5. But since its release I am aware of two peer reviewed papers that say it should be lowered further. If these feedbacks do not exist to a significant extent then global warming cannot occur at a dangerous level. It also mere opinion that *'to date action to reduce greenhouse gas emissions has not been strong enough.'* Again I disagree. If they don't cause significant warming then they are not a problem and there is no need to reduce them is there?

The claim that *'to have a good chance of limiting warming to two degrees, the world can emit no more than a total budget of about 2900 billion tonnes of carbon dioxide'* is entirely dependent on the climate sensitivity. If the climate sensitivity is wrong, which is almost certain, then so is the total amount of carbon dioxide we can still emit. Overlooked in the Consultation document, and indeed in almost everything pertaining to climate change, is the absolutely critical role of carbon dioxide to life. It is essential for all plant life and as all other life depends on plants, either directly or indirectly, it is essential to all life. Raising carbon dioxide levels from the pre industrial level of 270 parts per million to the current 400 parts per million has helped plants flourish. They can grow faster and need less water. Science exists that show the planet is now greener than it was, purely because of this extra carbon dioxide. The atmospheric level of carbon dioxide is still well below the optimum level for plant life. I cannot conceive of a good reason to constrain plant life by holding atmospheric levels of carbon dioxide below that which is optimum for plants. The very fact that plants thrive at higher levels of atmospheric carbon dioxide than currently exist is very strong evidence that the notion we cannot go much higher without a major effect on global temperature is majorly flawed.

The propaganda continues in Chapter One when it says *'each of the last three decades has been successively warmer than the past'*. This is an extremely poor argument. All this proves is that the world has warmed. Very few will argue with that. It does nothing to prove what caused the warming. It does not prove the warming is continuing. It does not mention that the rate of warming has slowed. In fact it is possible that cooling could take place under such a scenario. Consider this; one decade warms by one degree. The next decade cools by half a degree. That second decade will have a higher average temperature than the first one in spite of the fact it is cooling.

But it gets even worse. Further into the paragraph I read; *'we are likely to see average global temperatures warm by more than 4 degrees by 2100.'* An objective consultation document would also say that the temperature may rise by less than one degree. The rate of temperature rise so far this century is so low it is statistically insignificant. It is therefore more probable that total temperature rise this century will be less than the IPCC's AR5 central estimate of 1.67 degrees, rather than more. Therefore the four degrees mentioned in the Consultation Document without any qualification whatsoever is blatant scaremongering. I would note that a statistician has worked out the likelihood of three degrees of warming currently has a mere one in 214 billion chance of happening. What then is the chance of a four degree temperature rise? It is obviously even less. All these projections of future temperatures come from models. These models have been shown to be diverging from real world data. It appals me that those promoting human caused global warming rely on these obviously flawed models and ignore the real world data.

I could go on and comment on things like melting glaciers, acidic oceans, sea level rise etc, but I think I should have made my point that the reality of what has happened and is happening with global climate is far from the scaremongering in the consultation document.

I also consider that your costs to the economy are grossly underestimated. I will deal more fully with this in question three. However the reality of the low quality of the Consultation Document means that any and every submission which relies exclusively on said document will be grossly biased and

will overstate the level of the target that is affordable and appropriate. This thus makes a mockery of the whole consultation process and I am appalled by it.

It is far too easy to simply look at the results of the IPCC Summary for Policy Makers and conclude that global warming is major problem. However a more balanced analysis shows a different story. Even the IPCC itself in its main reports acknowledges there is much uncertainty. It is becoming increasingly likely that the main driver of our climate system is the sun. If this is so, then there is nothing we can do to stop the climate changing. We must instead concentrate all our efforts on building a strong and resilient economy to cope with whatever the climate brings our way, be it warming, or as is becoming increasingly more likely, cooling. Indeed, this is what humanity has done since time began. Why we have suddenly developed this notion that we can hold back warming any more than King Canute's advisors thought he could hold back the tide eludes me. All it will turn out to be is an exercise in futility resulting in hardship, suffering, poverty and many deaths.

1b. What is most important to you?

Dealing with the real issues that face the world, such as poverty in the Third World that is being exacerbated by restrictions to cheap fossil fuel that brought the Western World its present prosperity. Because they lack cheap electricity, or maybe any electricity at all, they are forced to cook on open fires which are very energy inefficient, and the particles and gases in the smoke other than the harmless carbon dioxide are a major health hazard. Electricity would also allow water pumps to bring clean safe water to villages and towns. It should also be noted that Western world prosperity will fall significantly in the move to a world using less fossil fuel.

It is also highly immoral to produce biofuel on land that should be producing food. To allow people to starve while fighting so called climate change is tantamount to murder. Similarly, planting pine forests on land that should grow food, or restricting their removal from land that could grow food is equally immoral.

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?

It is stupid to argue that New Zealand's emissions profile warrants special treatment. Every nation can find reasons why it is deserving of special consideration.

But let me expose some serious flaws in our supposed emissions profile. Firstly, it is purported that almost half our emissions come from livestock. Of these two thirds are assumed to come from methane and one third from nitrous oxide. Methane is a very short lived greenhouse gas and quickly breaks down in the atmosphere. The IPCC admits that it is gone in 50 years. Looked at another way, 80% of the methane our livestock emitted in 1990 is now gone. Yet our emissions profile makes no allowance for this. It simply keeps adding the emissions we produce this year, with no allowance for those produced in the past that break down. In fact a constant number of livestock hold the

atmospheric concentration of methane at a constant level. By definition, global warming can only occur through an increase in atmospheric concentration of methane. The only methane that should be accounted for is any increase in livestock numbers over our 1990 levels.

The second major misunderstanding is the importance of methane in the overall picture. Because we constantly hear that methane is a more powerful greenhouse gas than carbon dioxide, most people assume that it does more damage. Indeed, even the science community have fallen into this trap. We have reports calling for less red meat consumption, or even a total ban on red meat consumption. Millions of dollars have been poured into research for ways to reduce livestock methane emissions. But, to the best of my knowledge, nowhere has anybody actually sat down and calculated how much warming livestock methane emissions could cause. I have approached a number of scientists, including our own Pastoral Greenhouse Gas Research Consortium (PGGRC) with this question. None had an answer. I consider it appallingly poor science to investigate a solution to a problem without first quantifying the problem. I have made it my personal challenge to quantify this problem. It appears that if all the livestock farmers in the world were to double their output of methane the global temperature rise would be a paltry, insignificant 0.05 degrees. Check you read that correctly! Yes! 0.05 degrees. Why on earth would anybody worry about that?

I believe we are walking a very dangerous path with the PGGRC. There is absolutely no guarantee that any technology that reduces an animal's methane production will improve that animal's overall productivity. Farmers therefore face the real risk of adding a cost to their production system to reduce the perceived danger posed by these methane emissions for no economic benefit and for no benefit to the climate either, simply because our science community has been totally negligent about quantifying the problem before they embarked on their perceived crusade of saving the planet.

I think it absolutely unwise to depend on purchases of carbon credits from offshore to meet our commitment. This worked under the Kyoto period because of a surplus of units from the collapse of the Soviet economy and also the relatively low emissions reduction targets. With these two factors gone I believe that there will be very few opportunities to buy credits. We should therefore set a target based on what we can actually realistically and economically achieve through emissions reductions onshore. Purchase of carbon credits offshore would only be used as a contingency measure if one of our planned reductions failed and we were left short of our target.

Another danger with credits purchased offshore is the integrity of those units. What if some country closed down its coal fired power stations and replaced them with nuclear power stations, then sold the resulting carbon credits off to us? Since we don't want nuclear power ourselves, would it not be immoral to buy such credits?

Similarly, I do not believe that forestry should be relied upon as part of our commitment. As the consultation document rightly points out, many of our forests that were planted to meet our earlier commitments are maturing and will no longer provide us with credits. We have a finite land resource and we cannot plant forests forever to meet our commitment. I concede that there is still land that

needs to be planted for erosion purposes. But there is also a lot of land that has pine trees that should be growing food. As mentioned earlier, it is immoral to keep this land locked up.

If it is sincerely believed that carbon dioxide is causing global warming then we must tackle that issue directly now. Planting forests to cover our current emissions merely transfers the problem to the next generation. I believe that forestry should not be a part of our target.

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?

Zero

I cannot possibly agree with the costs on household consumption shown in the consultation document. In the first instance I believe it was a gross error to provide costings that use a carbon price outside the range of expected carbon prices shown in box 7. Even those prices in box 7 seem low to me. I have seen at least two economics papers that say we would need a carbon price of at least \$100/tonne to achieve an emissions reduction of just 10%. Lord Monckton has produced a peer reviewed paper based on the now defunct Australian Carbon Tax. In this he demonstrates that if it were applied across the global economy, the cost of preventing 0.17 degrees of warming over the next decade (the central estimate of the IPCC of the amount of warming in that period) would take 80% of global GDP over the same period.

My husband has done budgets for our farm, which has an economic performance that is above average. At a carbon price of just \$50/tonne our operation would be completely uneconomic under the current flawed methodology of calculating livestock emissions. At a carbon price of just \$20/tonne we would make more out of watching pine trees grow for carbon credits than farming livestock, assuming that carbon forestry was still an eligible land use. Clearly we do not need to see much movement in carbon prices to see New Zealand's entire sheep and beef industry wiped off the map. Our export earnings would plummet, unemployment would soar with no meat processing and shearing industries, plus the attendant flow on effects to other sectors of the economy. Our balance of payments would collapse. In fact, it is just laughable that the consultation document could suggest such a trivial cost to the economy. I would suggest that the best measure of the effect of a low carbon economy is to go and have a look at one of the world's low carbon economies. Unemployment is rife, poverty is rampant, life expectancy is low. Why would anyone want to impose that on New Zealand?

I note that the Green Party has already decided that the post 2020 target for New Zealand should be 40% below 1990 levels. Since we are currently over 20% above 1990 levels, in real terms, this effectively means that we would need to halve our current emissions from their present level in just five years time. I see that the Green Party has had a good muster of attendees at the consultation meetings I have received reports on, and have made their target of 40% reduction quite clear. My

husband asked them at the meeting he was at, how they intended to meet this target. Their simplistic reply was that the important thing was to set the target, then find a way to meet it. I consider this highly irresponsible. Consider this: I go to a builder and ask him to build a house. He asks me how am I going to pay for it? I say I don't know, you just build the house and I will find a way to pay. Is that builder going to build me a house? Of course not. Unless someone comes up with ways to achieve their target, those targets are not worthy of consideration. If we want to reduce emissions by 40% we would need to halve our livestock numbers under the current flawed methods of calculating our inventory. We would need to take half the vehicles off the road. Farmers would have to use half the energy to prepare the ground for food crops, harvest and process the food and then only half the energy could be used to get it to the supermarket and onto the consumer's plate....and so on. It is simply physically impossible. Again, if anyone wants to see what such a lifestyle looks like, try the subsistence agriculture of the low end of the Third World.

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?

There are opportunities to improve fuel efficiency. Moving product off road onto rail is one. Modern vehicles are becoming ever more fuel efficient. Modern coal fired power stations are much more efficient and also do not produce nearly as much pollution in the form of black smoke. Please note; carbon dioxide is odourless and colourless. It cannot be seen or smelt, and is not a pollutant as so many mistakenly state.

There is, however, absolutely no need to move to a low carbon economy for the sake of global warming. As technology advances alternative energy will become cheaper and will naturally displace fossil fuel, just as fossil fuel has displaced the horse in the Western World. Let us not delude ourselves that fossil energy is running out anytime soon. I have heard the cry of 'peak oil' since I was at school in the 1970's. Fossil fuel is still being found. In fact I have seen a hypothesis that fossil fuel may in fact be a renewable resource. It may not be a truly finite energy source after all. Natural gas has been experimentally produced in the laboratory to support this hypothesis.

The best way to reduce reliance on fossil fuels would be electric cars. However we have few hydro opportunities available. Wind generation is inefficient as it requires standby generation for when the wind does not blow. It takes a lot of turbines and land to generate very little electricity. The turbines also kill birds and bats. The only practical method of generating cheap electricity would be nuclear power. I don't see the public at large swallowing that pill any time soon and I am certain the Green Party which is so determined to see the last of fossil fuel would be equally adamant that we don't need nuclear energy.

Summary

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

It should attach conditions to its target. Given that global warming is currently not happening, I would argue that there is currently no need to make a post 2020 emissions reduction target. However, for better or worse, New Zealand has agreed at Lima to make a commitment that is more aggressive than what we have committed up to 2020. This therefore creates a dilemma.

I would recommend we go for the lowest target possible. Our current target is 5% below 1990 levels by 2020. This would mean that it would probably require a minimum target of 10% below 1990 levels for the post 2020 commitment period. But I strongly recommend the following conditions be attached:

1. The commitment will not take effect until the global average temperature across the five data sets of University of Alabama, Remote Sensing Systems (the two satellite records) Goddard Institute for Space Studies, Hadley Climate Research Unit of the University of East Anglia and National Oceanic and Atmospheric Administration (the three land based data records) show a warming trend for this century to date of at least one degree for a minimum of 25 consecutive months. This eliminates the possibility of a natural short term climate fluctuation such as El Nino triggering the commitment.
2. If a trend of one degree this century of 25 consecutive months as shown on the above data sets is not reached before 2030 then the commitment totally lapses.
3. If the above data sets show a cooling trend for a period of 25 consecutive months for this century then the commitment shall immediately lapse. The minimum period of 25 months is to ensure that a natural cooling event such as that caused by a major volcanic eruption does not trigger the cancelling of the commitment. Obviously if the world is cooling then we do not need a commitment.
4. Given that questions are being raised about the validity and integrity of the data from some of the above series, the global average for determining the triggering of our commitment will only use those of the five data sets for which the compilers of the data sets make all their raw data, and the calculations that are made to compile the series, freely available for independent audit.

Other comments

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

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.