

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

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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

1b. What is most important to you?

Cutting emissions as quickly as possible as we have very little (if any) time left to do that to avoid catastrophic climate change.

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?

New Zealand has enormous capacity to capture carbon in soil through well-managed pastoral farming, however this occurs primarily via mycorrhizae (beneficial fungi) in the absence of fungicides and synthetic fertilizers. Unless New Zealand switches to mostly organic agriculture, our ability to sequester carbon will be very limited. Research studies by Massey University and others show that organic agriculture is at least as profitable as conventional agriculture, with significantly less pollution of our waterways and other adverse environmental impacts so going organic would greatly benefit New Zealand, even without considering climate change.

By switching to organic agriculture and using techniques such as holistic planned grazing that increase carbon sequestration, New Zealand can and should easily match Europe's target of reducing net emissions to 40% below 1990 levels by 2030. The estimated cost given in the discussion document for meeting this target by purchasing carbon credits overseas is low enough that we can easily afford it in the event that the expected carbon gains from switching to organic agriculture fail to materialize. We also need to set shorter term targets to significantly reduce both net and gross emissions below 1990 levels.

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?**

Increasing carbon content of soils greatly increases the ability of soil to hold water, increasing resilience to flooding and drought and significantly increasing production during dry spells, thus increasing farmers' incomes at little or no cost. Reducing emissions in other areas can actually save New Zealand money, for example by shifting spending from unneeded white elephant new motorways to public transport. New Zealand can reduce its emissions significantly at little to no cost, with benefits such as job creation being worth more than the money spent even without considering climate change.

The consultation document claims that reducing our emissions will slow economic growth, with no evidence to back this assertion. On the contrary, Sweden has had the highest carbon tax in the world and has reduced emissions without any reduction in economic growth as a result. The New Climate Economy Report released in 2014 by a team of internationally renowned economists, led by Lord Nicholas Stern, found that countries can improve their economic performance while cutting emissions. The Chair of the Bank of America, the head of the OECD, the World Bank, the Vice Chair of Deutsche Bank, and many others, endorsed this finding.

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?

The New Zealand government needs to invest in many different avenues for reducing our emissions, including requiring realistic feed-in tariffs to encourage renewable small-scale local electricity generation such as solar panels on domestic houses, tripling spending on public transport (and reducing spending on motorways, road widening and new roads by a corresponding amount), tightening emissions standards for all vehicles and raising fuel efficiency standards for new vehicles, low cost loans for householders wishing to improve home energy efficiency or install solar photovoltaic panels, investing more in large scale wind generation and other renewables and more research into ways to reduce agricultural emissions particularly into the advantages of organics and holistic planned grazing.

Summary

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

The expected cost of purchasing carbon credits on international markets is so low that even if the actual cost was three times as high, a 40% cut below 1990 levels by 2030 would still be affordable. Therefore New Zealand needs to set an ambitious target and aim to meet it by cutting domestic emissions, with the understanding that we can purchase carbon credits to meet the target as a last resort.

Other comments

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

A number of prominent climatologists, particularly James Hansen, have postulated that the safe level of CO₂ in the atmosphere is probably around 350ppm, well below current levels, and therefore we need to rapidly reduce it by sequestering more carbon than we emit. The world needs to get to net negative greenhouse gas emissions as soon as possible and probably no later than 2050 if we are to avert catastrophic climate change. New Zealand is well placed to achieve this by sequestering carbon in soil and so in addition to a target of 40% below 1990 levels by 2030 and additional shorter term targets, we should set longer term targets including a global and New Zealand target at least 130% below 1990 levels (that is net negative emissions) by 2050.

Given that the world can only afford to burn at most 20% of known remaining fossil fuel reserves and given the high risks associated with deep sea oil drilling and hydraulic fracturing, the New Zealand government should either ban or adopt a 10 year moratorium on both these activities. Hydraulic Fracturing is banned in France and Quebec has a moratorium on it.

New Zealand needs to close Huntly Power Station within 5 years, commit to 95% renewable generation within 10 years. New Zealand needs to scrap the failed Emissions Trading Scheme (or

should that be scam ?) and replace it with a carbon tax, increasing rapidly to a similar level to Sweden within 12 years.

The UK Climate Change Act requires all future UK governments to produce independently audited credible plans for reducing greenhouse gas emissions in line with targets. The New Zealand government should adopt similar legislation.

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.