Consultation on setting New Zealand’s post-2020 climate change target

Copy of your submission

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Objectives for the contribution

Do you agree with these objectives for our contribution?

1b. What is most important to you?
1.1: Given NZ’s position as a wealthy country and one of the highest emitters of GHGs per capita in the world, NZ has a social, environmental and economic responsibility to be nothing other than ambitious in our contribution.

1.2: This objective negatively frames the potential outcomes of a shift towards a low emissions world. The word “costs” could just as easily be substituted for “opportunities”.

The consultation document ignores the potential impacts on society of not doing enough to substantially reduce emissions. Rising temperatures are expected to cause major shifts in ecosystems and precipitation, affecting human health, food security, and infrastructure. Surely, these consequences must be considered to guide an ambitious target.

1.3: This objective assumes that NZ’s transition to a low emissions economy will reduce the competitiveness of our products in the global market. Conversely, the reverse is true: it is this very transition that NZ must make to remain competitive into the future. It makes economic and environmental sense for NZ to seize this opportunity and develop a reputation as leaders in a low emissions world.

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?

The consultation document uses NZ’s “unique situation” (highlighting high agricultural emissions and an already high renewable energy sector) as an excuse to set a less ambitious target than could be expected for our country’s wealth and emission levels. This is unacceptable. Each country has circumstances that are incompatible with reducing emissions: many countries rely on extractive industries; others on heavy manufacturing.

Agriculture: Because of NZ’s isolation, our agricultural products already suffer high food miles, and this will make them increasingly uncompetitive in a low emissions world. Although reducing agricultural emissions is not straightforward, innovative advances in technology and ideology will give NZ products a competitive edge. This is the way forward.

Renewable energy: Fig. 2 of the consultation document shows that approximately a 1/4 of all GHG emissions and over 1/2 of all CO2 emissions come from the energy sector. Thus, further improvement in this sector will have a large impact on reducing total emissions. NZ is a technologically advanced country with the capacity to aim for 100% renewable energy.
Transport: Transport is responsible for 17% of current GHG emissions (Fig. 2. in consultation doc.). A reduction in car usage and increased use of public transport (as well as increased cycle infrastructure and growth of electric cars), will both reduce household costs and total carbon emissions. These gains from a lower emissions future support an ambitious target.

An upgrade of NZ’s outdated diesel trains to electric trains would be an obvious step towards reducing emissions in the transport sector - a solution that could save money in the long term.

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 would be a reasonable reduction in annual household consumption?

Once again, the question is skewed towards the perceived costs of reducing GHG emissions. There is scope for NZ to pursue GHG reduction strategies that will enhance, rather than impede, economic progress. The consultation document does not discuss the advantages of such strategies; nor does it discuss the future costs of not doing enough. Importantly, the social and environmental outcomes of different target levels should be discussed alongside costs, for more meaningful long term decision making.

The models used to forecast future annual household consumption, in the discussion doc., lack transparency. Are the economic gains of decreasing GHG emissions included in the calculations? For example: lower car costs in an increased public transport and electric car society; lower energy costs with appropriate solar distribution schemes etc.

Even if the models are taken at face value, a 0.6% difference in annual household consumption between the 5% and 40% projections seems minimal, especially when considering the high levels of uncertainty that one can assume is present in the projections. It should also be highlighted that a high target would not mean a net decrease of annual household consumption, but rather a lower potential increase of annual household consumption.

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 opportunities listed read as some of the positive and inherent outcomes of reducing GHG emissions. All are achievable. These opportunities should have been included in discussion of the household consumption models; incorporating health, environmental and social well being outcomes, along with economic. There is a danger in relying solely on economic decision making tools (as the consultation has done), as not all important facets in life can be costed. We need to explore and promote the benefits of a lower emissions world across all sectors.

Summary

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

NZ currently invests $10 million per year into agricultural research to discover new technologies that reduce emissions, without reducing productivity. Considering agriculture is NZ’s most polluting and economically important sector, this amount does not seem “significant” (NZ is spending more than double this discussing a new flag). Greater investment in this field could increase innovative breakthroughs, reducing uncertainty and contributing to lower emissions/costs and greener products.
NZ should reduce agricultural emissions irrespective of carbon trading policies. "Green" products will increasingly gain a competitive advantage in a low emissions world. NZ cannot afford to continue its mantra of increasing emissions, whilst "meeting" targets through carbon trading and land use changes.

Other comments

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