Re: Submission on New Zealand’s Post 2020 Climate Change Target

I am writing to express my hopes and concerns regarding New Zealand’s climate change target. I have a background in ecology, and environmental management, and work as an independent social researcher and facilitator providing input into complex environmental challenges. This includes working in the area of natural hazard management. I am very aware of the mounting costs to communities throughout New Zealand as a direct impact of coastal erosion, flooding, drought and catastrophic storm events, as well as the expected impacts from sea level rise. I regard the evidence of human impacted climate change as unequivocal and consider action by the New Zealand government to support the reduction of greenhouse gases in the atmosphere extremely important to our personal, economic and political security.

The Discussion Document

I am glad that the discussion document produced by the Ministry for the Environment acknowledges the global significance of climate change, and the importance for all countries to take action. I also appreciate the acknowledgement in the document that actions to date have been insufficient and that New Zealand can play a significant leadership role in addressing this.

However, overall the document has an unambitious tone. I feel strongly that direct and assertive actions to reduce New Zealand’s greenhouse gas emissions could have more immediately positive implications for our communities and our economy than this document considers. I believe our resources, economic and political stability and skilled, capable and educated population makes it highly appropriate for us to be setting a target at the most ambitious end of the range.

I would like to see a response to climate change targets that acknowledges the size and complexity of the issue. We need a whole of government response and an enabling policy framework that facilitates communities, businesses and government taking action together. We also need all political parties to work together. The long term goals are too important to be subject to partisan point scoring.

Objectives for the contribution

The objectives outlined in the discussion document are overly conservative and overlook the positive opportunities that a more aspiring agenda could achieve. An ambitious target and plan for achieving it would provide certainty of direction and be galvanising to the creative capacity of New Zealand businesses and communities.
The emphasis on minimising impact on existing communities and sectors—particularly the agricultural sector—is fundamentally flawed since it fails to include the costs of inaction or the potential opportunities and benefits of a GHG free economy. For example, drought already has a significant impact on New Zealand’s agricultural sector and climate change projections show this is likely to increase. There is also a potential risk of our agricultural exports being blocked if we fail to meet international climate change standards and a corresponding benefit if our agricultural produce can be shown to be coming from a country with high climate change accountability.

The ‘fairness’, referred to in the objectives also shows little consideration to future New Zealanders or communities outside New Zealand, such as many of our pacific neighbours, for whom the impacts of climate change will be most immediate and catastrophic. Indeed, ‘fairness’ and ‘costs’ take on an entirely new meaning if you include the demands on our international aid effort of supporting many of these nations in the future, or the challenges we will face trying to address the needs of climate change refugee migrants.

What is most important for me is that the objectives for the contribution:

- reflect the full costs of inaction;
- show commitment to significant action that is in keeping with the importance of the climate change issue to our nation and the world;
- reflect confidence in New Zealand’s innovative potential for response; and
- recognise the need to set in place a whole of government and whole of society plan that will translate targets into reality.

**Fair Contribution**

I have reviewed material on this from a number of sources and consider New Zealand’s commitment to reducing climate change emissions should have three components:

- A 40% reduction (compared to 1990 figures) by 2030
- Zero net emissions by 2050
- Net absorption of GHGs thereafter.

It is important that all GHGs are considered, not just CO2. It is also important that there is continuous monitoring so that more aggressive measures can be employed when possible.

**Costs**

(See earlier comments). The misleading way that costs have been identified in the discussion document highlights the need for the target setting process to be cognisant of issues across a wider range of sectors than it currently appears to be considering (e.g., local government, disaster response, insurance, tourism, health, immigration and many others).
New opportunities

I regard all the areas of opportunity identified as feasible in the processes of pursuing a zero GHG economy. To these I would add:

- Significant health benefits of changing transportation away from cars
- Political security from greater independence from unstable fossil fuel producing nations and reduced pressure from climate change refugee issues.
- Natural hazard risk mitigation
- New Zealand has a highly capable high tech industry that could be world leading and benefit New Zealand economy greatly if given the kind of government support other climate change polluting industries currently enjoy.
- We have the opportunity to revisit established technologies such as rail and cycling with many co-benefits in terms of vitalising regions and cities.

Uncertainty
Uncertainty is a core component of the climate change issue. It is inherent in the options for GHG mitigation and in the progressive effects of climate change itself. This uncertainty, regardless of what we do, is already impacting on individuals and communities. It therefore cannot be an excuse for inaction. I believe that the best way to mitigate uncertainty is to set clear targets, and provide a strong framework for action within which creative and innovative response by businesses, communities and government is possible; coupled with progress monitoring and adaptive response as we learn more.

Thank you for the opportunity to submit. I would very much like to see New Zealand take an honourable leadership role and hope that those representing our country in Paris will be empowered to take courageous and meaningful action of which we can all feel justifiably proud.

Margaret Kilvington

2 June 2015