

---

June 1, 2015

Ministry for the Environment  
WELLINGTON  
[climate.contribution@mfe.govt.nz](mailto:climate.contribution@mfe.govt.nz)

Kia ora

## **Consultation on setting New Zealand's post-2020 climate change target**

Thank you for the opportunity to be heard about this important issue that affects us all and more importantly future generations!

Please find below responses to the questions posed as part of this consultation and my thoughts regarding the actions needed.

### **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**

Agree - the contribution needs to be in line with other countries taking climate change seriously and in line with what it would take to keep warming below 2 degrees C.

- costs and impacts on society are managed appropriately**

These are secondary considerations to setting a target that achieves the above objective adequately. Clearly once we know what we need to do (and is right to do) then we need to work out the best way of managing costs and impacts fairly



- **it must guide New Zealand over the long term in the global transition to a low emissions world.**

It must also guide NZ in the short term given the urgency for meaningful action to be taken before 2020 and 2030 as well as 2050.

### **1b. What is most important to you?**

Setting a target that demonstrates that NZ is taking climate change seriously and is in line with other countries that are setting ambitious but required targets.

### **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 needs to in line with with what developed countries need to deliver in the IPCC scenario for 2 degrees.** This is what we need to do to ensure that New Zealand is adequately playing its part as one of the 'developed' countries. This target needs to be a target of a 40% reduction in net carbon dioxide emissions by 2030 (from a 1990 baseline) with an ultimate a target of zero net carbon dioxide emissions by 2050.
- **Separate targets for CO2 and Methane** - Given the different effects between methane and CO2 there should be different targets set for each. (i.e. methane has a higher immediate effect but this reduces over time whereas CO2 has a lower but longer term effect) Clearly a large % of NZ's emissions are methane from agriculture. Continued research is needed to try to find a way to reduce methane emissions from ruminant livestock.
- **Target should take into account sequestration for the wood we export** - New Zealand should argue for an update of the rules around the treatment of forestry to ensure we are suitably rewarded for the carbon in the wood we export. The current Kyoto approach counts them as emissions – as if we'd burnt the trees the next morning however what actually happens is that most is used for building and furniture which continues to store the carbon (at least temporarily), and if we are exporting logs then it's wrong to count these as emissions by New



Zealand. It depends on what happens to the wood in Japan, Korea, China or wherever they end up – and even then it should be part of their emissions arithmetic not ours. After all, Saudi Arabia doesn't have to pay for the emissions of the oil it exports.

### 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?**

- **This is the wrong question – NZ needs to have a target that is in line with what developed countries need to deliver in the IPCC scenario for 2 degrees** – Once we have set a target or combination of targets that will achieve that then we work out how to best assign /distribute costs.
- **Incomplete information on costs in the Discussion Document as there is no assessment of the costs of inaction on climate change.** These costs will be significantly higher and will demonstrate that it is a 'no brainer' to do something now
- **Incomplete information on costs in the Discussion Document as there are not also scenarios provided where the treatment of methane and forestry are taken into account.** New Zealand can and should be going to the international community later in the year indicating what is possible without changes to the rules and what is possible when the rules are altered to better reflect the effect of methane and forestry.
- **The cost information in the Discussion Document does not acknowledge that the majority of the projected costs presented are those to achieve our existing target of 5% reduction through to 2030** – the difference of a higher target is a relatively small additional amount. If Government's plan already was to truly meet their existing 5% target, we'd already be being hit up for the \$1,270 pa. But because our government is failing badly here, the cost of catch-up is the bulk of what lies ahead.



#### **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?**

- Fuel and energy efficiency can reduce costs to businesses and households.

##### **Critical**

- Our high level of renewable electricity generation creates opportunities, including greater use of renewables in other sectors, through the use of new technology (for example, use of electric vehicles in transport)

##### **Desirable**

- A transition to a low-carbon economy leads to greater energy security and limits our vulnerability to oil price volatility, supply disruptions and potentially high future carbon prices.

##### **Critical**

- Reducing greenhouse gas emissions and increasing forest sinks can lead to improved health, environmental and social well-being, and improved erosion control and water quality.

##### **Critical**

- Remaining aligned with the global transition to a lower-carbon economy will ensure we remain competitive and productive in a world where the emissions intensity of our products and services will increasingly be an issue.

##### **Desirable**

## **Summary**

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

It should assume a conservative approach when considering improvements in technologies and only count those that exist or are close to being in existence.

As mentioned New Zealand should go to the international community promoting a change to the rules regarding methane and forestry and have 2 emissions target offerings depending on whether the rules are able to be changed or not.



## Other comments

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

#### Target Request

I would like the government to have a target of 40% reduction in net carbon dioxide emissions by 2030 (from a 1990 baseline) would be in line with the EU target. This would also put us on our way to a target of zero net carbon dioxide emissions by 2050, which is consistent with what developed countries need to deliver in the IPCC scenario for 2 degrees.

This wouldn't mean weaning ourselves off fossil fuels entirely, however it would mean that any fossil fuels we burn would have to be offset (e.g. by forestry). This target would be conditional on an adjustment to the accounting practice for methane, based on current scientific information as to its relative short and long term effect when compared to CO<sub>2</sub> and to the forestry rules following harvest (and/or export of timber)

#### Request for Cross-Party Climate Working Group

This issue needs cooperation across the political spectrum and efforts to engage all New Zealanders in the solutions. Climate policy can't go on being a political football with major policy flip-flops every time there's a change in government. We need stable climate policy that steers us clearly towards a zero carbon society. This will allow businesses to make good long-term decisions and New Zealand will benefit by attracting investment in low carbon industries and innovation.

#### Request for Increased Statutory Commitment

The UK Climate Change Act provides a model for government commitment and accountability that New Zealand should adopt. This Act puts national emissions targets in domestic law (which is not the case in New Zealand) and requires every government department to produce credible plans to meet these. This will show other countries we are serious. The Act also sets up an independent Climate Commission to advise government on its policies and hold whoever is in



power accountable. This makes the issue of climate change less politicised by having an authoritative independent voice in the debate.

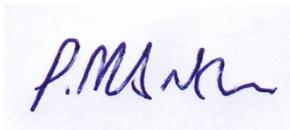
## Conclusion

Delaying action on carbon emissions is a short term strategy which results in awful long term consequences, – economic, social and environmental

We are current doing really badly with our gross emissions rising 21% between 1990-2013. The only reason that we have survived he first Kyoto commitment period is that we have been able to subtract off the extra carbon stored in forests planted since 1990. Conveniently for the Government, it happens there was a bulge of forest plantings in the mid-1990s. But as we start to harvest those forests post 2012, our net emissions go through the roof. By 2020 they are projected to be well above 1990 levels – so look sick compared to our target of 5% below 1990 levels. By 2027 our gross emissions will be around 36% above 1990 levels, and thanks to all our post 1990 forests being cut down our net emissions will be even higher.

In summary, the outlook looks really bad. We are miles away from where we need to be.

Clearly at some stage we will have to get emissions down and possibly really, really fast. So aren't we better – even with the gaming going on internationally – to start the process at least, rather having no policy apart from fortuitous forest credits and a windfall on the credits market to wing our way forward?



Paul McArthur

*~ Mo tatou, a mo ka uri a muri ake nei ~*

*“For us and our children after us.”*



**From:** Paul McArthur [REDACTED]  
**Sent:** Saturday, 23 May 2015 4:01 p.m.  
**To:** Climate Contribution  
**Subject:** Submission 14009

To whom it may concern,

I am disappointed that I have been given an unacceptably short opportunity to be consulted on an issue of such importance to me, my children and their future children.

It is clear from the documents released that the Government is not serious about acting on climate change. It intends to do the bare minimum it believes it can get away with. The Government continues to argue its totally discredited point of view that climate action will be too expensive, yet it does not consider the economic and environmental costs of doing nothing. And most importantly, it completely overlooks the enormous financial and job creation benefits of moving towards a cleaner, safer future.

So instead of talking about weak and meaningless targets, I want the Government to talk about real climate action. Tangible action within New Zealand that demonstrates that the Government will take climate change seriously. As a guide here is the outline of a real climate action plan I want to see the Government enact, if it's serious about taking pollution out of our economy.

A real climate action plan would:

- Commit to have 100% renewable electricity within 10 years
- Shut Huntly coal and gas fired power station by 2020
- Phase out all subsidies for fossil fuels like coal and deep sea oil drilling
- Develop a low carbon action plan to ensure that by 2050 all areas of energy (electricity, heating, transport and industrial use) come from clean energy sources instead of fossil fuels.
- Reform the electricity markets by guaranteeing priority access to the grid for renewable power generators.
- Shift the unnecessary \$12 billion road building programme to investment in smart rail and public transport infrastructure such as the Auckland City Rail Link.
- Prioritise the import and infrastructure needs (e.g fast charging points) for hybrid and electric vehicles.
- Introduce incentives to harness the enormous potential in plantation wood waste to sustainable transport fuels. It has been estimated that this could create tens of thousands of jobs in the forestry sector and help reduce our oil imports bill by \$7billion each year.
- Make the Emissions Trading Scheme more stringent so that it works, enabling industry to move away from polluting energies.
- Implement policies to incentivise 'low input' farming methods that are proven to reduce pollution and increase farming profits.
- Prioritise geothermal projects to realise enormous export opportunities in our geothermal industry, which could be worth up over \$4 billion a year to the economy.
- Promote New Zealand as an international centre of excellence for developing and trialling ocean energy technologies.

Without a real action plan to reduce climate pollution, the Government risks damaging our global reputation and wrecking our economy. But most importantly, they are denying New Zealanders the cleaner, smarter and safer future that we all deserve.

Sincerely,

Paul McArthur