

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
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1b. What is most important to you?

But, these are just nice words. It is how they are interpreted that is important.

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?

a) Morally, as a rich country with high historic per capita GHG emissions, we must reduce our OWN emissions – NOT pay other countries to reduce theirs.

b) We must recognise that reducing emissions implies CHANGING OUR ECONOMIC & LIFESTYLE BEHAVIOR. There will be costs to this. Some sectors will benefit, others will suffer. Government's job is to incentivise and ease the transition, not to do as little as it can get away with. This means, in particular, somehow introducing a meaningful carbon price which will shift consumption and investment and jobs away from fossil fuels, and into renewable energy developments and a lower-carbon economy.

c) The NZ Government should recognise openly that it made a huge mistake of judgement in the 1990s in supporting the inclusion of agricultural emissions in the overall metric. No other developed country has shown itself willing to penalise food production, and most developing countries with a high relative dependence on agriculture oppose the idea too. It was also a mistake to assume that livestock numbers in NZ would continue to decline and that land use would continue to swing towards forestry. By insisting on these peripherals we contributed to taking the focus off fossil fuels, where it should have been, and played into the hands of that global industry. As a country we now look stupid to the rest of the world, struggling in a big hole largely of our own making where difficult-to-reduce agricultural emissions make up 50% of our total. Why would an agricultural country argue for reductions in agricultural emissions? The answer is less than flattering to us as a country: we thought, because our agricultural emissions were declining at the time, it would give us a free ride under Kyoto! We should own up to these past mistakes, and support any initiative to exclude agricultural emissions from the post-2020 agenda (e.g., by recognising special needs for future food security, the short lifetime of methane gas, and the fact that wild and domestic ruminant animals have been emitting greenhouse gases for many millenia).

d) It is a hollow argument that we have less scope for reducing our non-agricultural emissions than other developed countries. We could probably move from 70% renewable electricity generation to 100% much easier than other countries with, say, 20% now could move up by 30 percentage points (closing the Tiwai Pt. smelter will facilitate much of this in one step). In transportation, there is plenty of scope to move towards more public transportation and electric vehicles. NZ should strive for more international credibility.

e) The post-2020 target set must be consistent with our already gazetted (2011) target of 50% reduction of emissions from 1990 levels by 2050.

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?

There are many reputable overseas studies which show that the overall economic costs of reducing emissions are relatively minor, while the costs of doing nothing are considerably higher. The kinds of costs being thrown up by the general equilibrium modelling of the NZ economy are only in the order of 1% of national income in 2027 under several scenarios. Surely this issue is important enough that we can sacrifice less than 1 year's economic growth, or that the NZ consumer can sacrifice about 1.5% of his household consumption. These numbers are peanuts compared to the possible economic and world security costs to NZ of several degrees of global warming.

But the entire focus should be on REDUCING DOMESTIC EMISSIONS, - not using international carbon markets, or establishing new forests. Forestry is a short term fix – mature forests are not net sequesters of carbon – and we can't keep putting more land into (young) forests indefinitely. And the NZ taxpaying public wants to see genuine progress on reducing global emissions, not money wasted on foreign offsets that arguably do nothing or very little in this regard.

Affordability for future governments need not be an issue. Taxes are always economically affordable. For example, British Columbia has had a fiscally neutral carbon tax since 2008. In its first 5 years it reduced B.C.'s fuel use by 16%, at the same time that fuel use was increasing by 3% in the rest of Canada. Carbon tax revenues, by law, go back to the community as income tax cuts, and the B.C. government has chosen to skew these towards low-income households. B.C. has also given some adjustment assistance, in the form of a lower effective rate of tax, to industries, like cement, particularly hard hit by the carbon tax.

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 last bullet point in the discussion document is most important – “remaining aligned with the global transition to a low-carbon economy”. The other bullets are also generally valid for NZ, though “increasing forest sinks” needs qualifying.

There is CONSIDERABLE REMAINING SCOPE through behavioural change, for energy savings and emissions reductions using EXISTING TECHNOLOGIES. Changing lights to LEDs, more insulation of buildings, turning unnecessary lights & appliances off at the wall, more use of public transport, etc.

Regarding NEW TECHNOLOGIES, I believe opportunities with biofuels for emissions reductions are overblown, and now being discredited. On the other hand, new and future developments with BATTERY technology (e.g., the just announced Tesla “Powerwall” for household electricity storage) will prove transformational by driving electric vehicle & other developments. Harnessing solar and wind energy requires storage, and new storage technologies will be important in NZ. For example, the new huge flywheel installation in Ireland. NZ should be looking at ways to GENERATE and EXPORT SURPLUS RENEWABLE ENERGY, such as through converting it to hydrogen, another storage option. And pursuing through R&D further opportunities for renewable generation – such as expanding rooftop solar, & harnessing tides & sea currents. So-called “smart” technology for managing electricity demand and supply at both household and grid level will become increasingly important.

Comments on DOMESTIC POLICIES:

ETS: so far a failure – I am very sceptical that it has a future. Will at least need to be given teeth, with reduced exceptions/exemptions, and a significantly higher carbon price induced by tightening emissions permits. Should probably be replaced with a CARBON TAX.

Renewable electricity generation target should be more ambitious (100% by 2025)

Policy of encouraging/supporting permanent afforestation should be dropped, and biofuel research should be restricted to non-land-use forms, such as diesel from sewage ponds. Economic realism (transportation costs/emissions), and life-cycle accounting will probably sink talk of creating fuel from cellulose in forestry wastes.

Agricultural greenhouse gas research is probably worth continuing even if agricultural emissions not part of target commitments, and \$10m is, after all, a pittance.

Fuel economy labelling scheme, & exempting electric vehicles from road user charges are both good ideas. Latter charges could be ramped up for other vehicles, and particularly large trucks to recoup more of their damage to roads (currently a hidden subsidy) and induce more use of public transport options.

Talk about making “impacts fair on different sectors” is rubbish. Some sectors are much more polluting than others. The whole idea is to internalize their adverse (social cost) externalities, and thus reduce their incentive for polluting actions. The more polluting sectors (and consumers of their products) have to be hit harder if the transformation to the low carbon economy is to be achieved. They have had a free ride up til now, and should be thankful that the new carbon penalties are not going to be retroactive.

NZ should cease forthwith all encouragement and assistance to fossil fuel extraction developments, on and off shore. These are inconsistent with a credible international stance on climate change containment.

Summary

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

NZ should be ambitious, and set an example for other countries. We should be moving now and not waiting for new international rules. We can be confident that new technologies will continue to emerge.

How can this consultation be part of an “ongoing conversation” when nothing like it has happened in the last 6 years or more? Is this the beginning of a new conversation?

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

All governments worry about getting re-elected. But sometimes, on important issues, and for the sake of future generations, they must show statesmanship/leadership, and endure some short-term pain for the sake of long-term gain. Neither the Labour nor the National-led governments in the last two decades have been willing to do that in addressing the threat of anthropogenic climate change. Rather their strategy seems to have been “pay lip service, negotiate commitments which will minimize changes in NZ’s economic life, and, to the extent necessary, pay other countries to do our share of reducing GHG emissions”. THEY MAKE ME ASHAMED TO BE A KIWI!

IT’S TIME FOR A RADICAL CHANGE IN APPROACH BY THE N.Z. GOVERNMENT ON CLIMATE CHANGE

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.