

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
x No

1b. What is most important to you?

As a scientist by training and with 40 years experience, the most important thing to me is *not to commit to measures that can have no possible effect on climate*. To set an 'ambitious' contribution would unfairly penalise the New Zealand taxpayer since the benefit would be not measurable, and indeed pointless, given that China will not peak their emissions until 2030, or more likley beyond.

What would be a fair contribution for New Zealand?

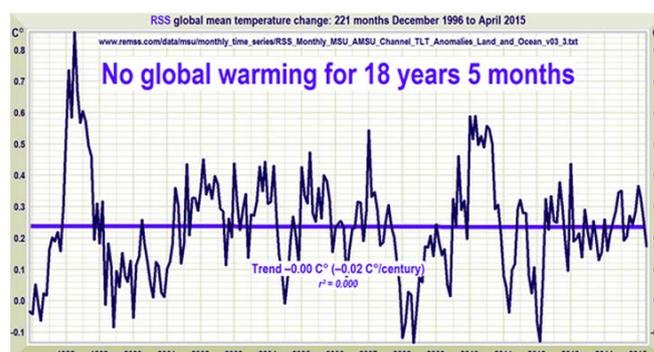
2. What do you think the nature of New Zealand's emissions and economy means for the level of target that we set?

New Zealand's current CO₂ annual emissions account for ~0.09% of current world emissions, or ~0.36% of China's emissions. If a Paris accord comes into being in 2020, it will be another 10 years before China will consider reductions, and at an unknown percentage. Assuming we adopt a 10% target below 1990 levels (thus saving approximately 3 million tonnes per year and emitting about 27 million tonnes per year in 1990 figures; then allowing for growth that has already occurred, achieve a savings of approximately 4 million tonnes per year), during the period from 2020 to 2030 the amount of carbon dioxide not released by us will amount to about 40 million tonnes. As a fraction of the emissions that will be released by China alone over those 10 years (assuming no growth for China) this will be, conservatively, 40 million/80 billion tonnes = 0.0005%. *New Zealand's 10 years of savings will be negated by ~2 days of emissions from China.* Without China making a firm commitment, that begins at the same time as other nations, the exercise is pointless, even if one believes that CO₂ drives global warming and that significant warming is taking place.

Furthermore, India plans to open 40-50 new coal mines over next 18 months (http://articles.economictimes.indiatimes.com/2015-05-13/news/62124619_1_power-minister-piyush-goyal-coal-india-ltd-coal-sector). Poland is planning a huge increase in coal power by 2020 (<http://bankwatch.org/our-work/projects/coal-fired-power-plants-poland>). Brazil is doing likewise (<http://www.powerengineeringint.com/articles/2014/11/brazil-seeks-energy-stability-as-coal-and-gas-power-auction-commences.html>).

Another approach is ask how much a contribution by NZ, and other industrialised nations, would contribute to a reduction in global temperatures? (Ignoring for the moment that for the past 18 years and 5 months the RSS satellite data show no warming at all (Figure 1), despite the continuing increase in CO₂. Ignoring also the fact that current temperatures are well below IPCC and model predictions (Figure 2)).

Figure 1 Source www.remss.com/data/msu/monthly_time_series/RSS



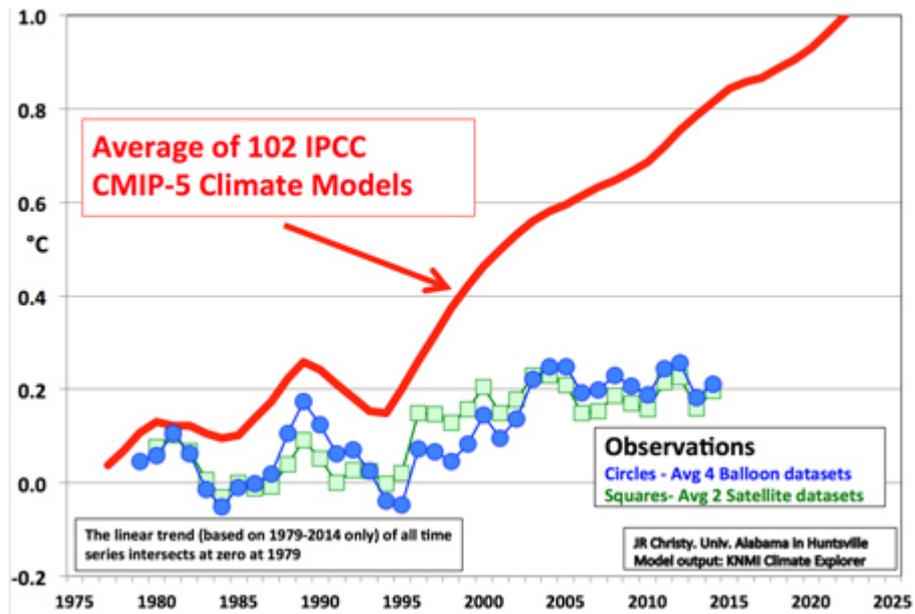


Figure2 <http://wattsupwiththat.com/2015/05/29/when-will-climate-scientists-say-they-were-wrong/>

The answer, for all industrialised countries combined, (assuming a 20% reduction of CO₂ emissions and a climate sensitivity of 1.5C) is 0.016C by 2050. (Determined by MAGICC, developed by scientists at the National Center for Atmospheric Research, US.) NZ's contribution as part of that group would be neither detectable nor measurable.

The argument that we have the additional burden of methane is not in my opinion sustainable – methane levels worldwide are rising slowly and well below predictions in the IPCC reports (in which predictions have had to be progressively reduced from the 1st to 4th report) (Figure 3).

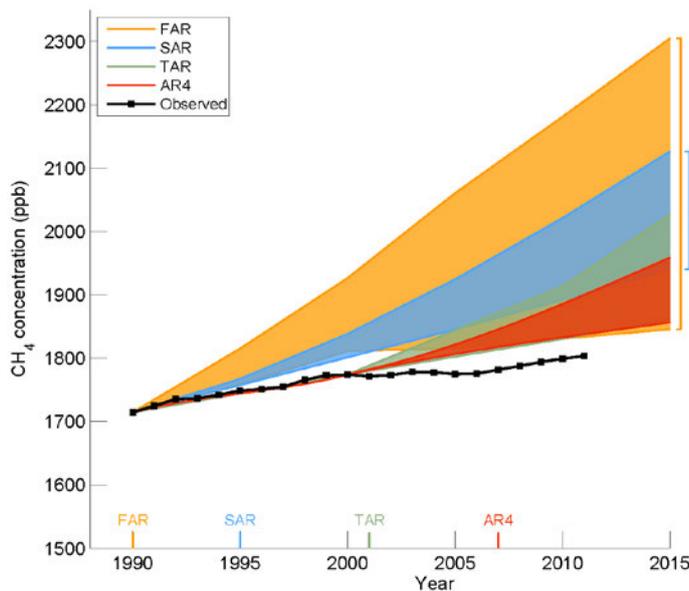


Figure 3

Source: page 42 of Chapter 1 of the IPCC AR5 second order draft.

My recommendation would be to only pledge reductions that are tied to reductions committed to by China – when and if that happens. In the mean time, recognising that the International pressure to do something will be considerable, and that we will lack the courage to argue from the data, we should adopt a low target, largely directed at increasing carbon dioxide sinks, until such time as China responds in a meaningful way.

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?**

If there is no commitment by China, then no direct costs should be imposed on New Zealanders.

- 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?**

Plant more trees. At the very least trees would provide a resource for the future once the fixation on CO₂ as a problem has passed.

Summary

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

It is not possible to take into account future uncertainties of technologies or costs.

- Before vaccines appeared, hospitals had elaborate and expensive approaches to deal with poliomyelitis and pulmonary tuberculosis. It changed overnight with the introduction of cheap effective treatments.
- We have been told countless times that ‘peak oil’ is here or coming soon, yet oil and gas reserves are increasing, not decreasing. (And the cost has decreased, and given that the contribution of gas to CO₂ levels is less than that for oil, this is acknowledged as the reason for flattening of CO₂ emissions in the US.)

- We have been told that the ice at the poles is decreasing and will continue to decrease. The official data say otherwise. Global ice has been effectively stable for decades, with decreases in arctic (now increasing again) countered by continuing increased ice coverage in the antarctic. Currently, as of May, 2015, global sea ice area anomaly is similar to the 1980s (Figure 4). Predictions of an ice free arctic have failed to eventuate.

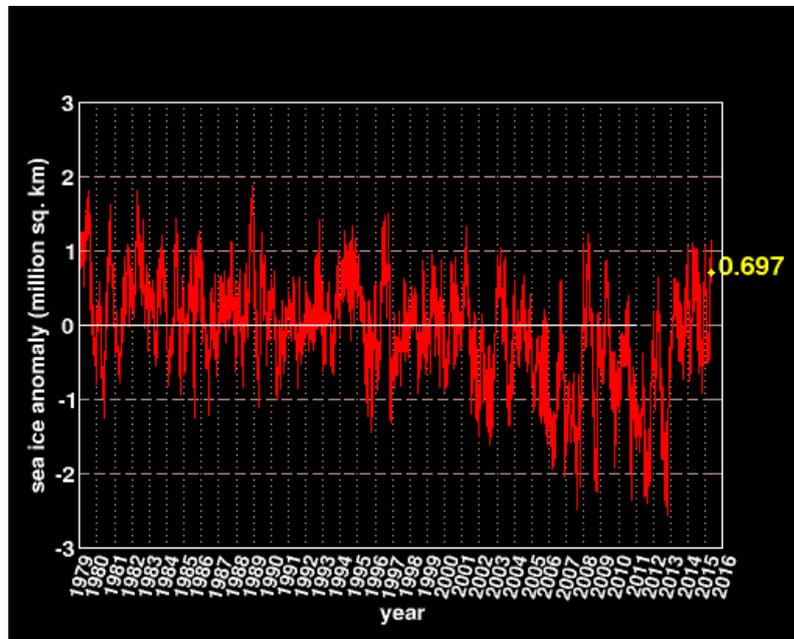


Figure 4

<http://arctic.atmos.uiuc.edu/cryosphere/iphone/images/iphone.anomaly.global.png>

- Climate models, as a prime example of a ‘technology’ with wide uncertainty, predicted (paradoxically with a very high level of certainty) ever increasing temperatures as a function of CO₂ increases, but they have clearly failed (see Figure 2 above).

In my opinion it is pointless attempting to take into account future uncertainties, unless one takes the decision that future uncertainties will not be factored into decisions, and decisions will be made on the best data currently available, including patterns of data leading up to the present. Current data and past patterns of change show that the small changes in climate that we have observed can be accounted for largely by natural variation. The contribution from CO₂ appears to be small, a statement supported by the progressively reducing estimates for climate sensitivity, including by the IPCC (see link to Curry testimony below).

Other comments

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

We should have the courage to wait for 15 years, just as China is doing. By then it seems likely we will know if the current trend of little or no change in temperature has continued, or indeed has trended downwards to a cooler state, as the cooling of the AMO would indicate (*Nature*, 2015; 521 (7553): 508 DOI: [10.1038/nature14491](https://doi.org/10.1038/nature14491)). Given that the rate of change in climate is highly likely to be similar to past rates of change, societies will have manageable time frames for action. Adaptation, if that turns out to be necessary, will be the most effective and cheapest option. My position on climate change, and what if anything to do about it, is best represented by the submission of Professor Judith Curry, Georgia Institute of Technology, to the United States House of Representatives, 15th April 2015. <https://curryja.files.wordpress.com/2015/04/house-science-testimony-apr-15-final.pdf>

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.