

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



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Objectives for the contribution

Do you agree with these objectives for our contribution? Yes

1b. What is most important to you?

The most important objective is one that is fair to all; where those that are responsible for the emissions are required to meet the full costs and are not subsidised by others. Targets should be ambitious and ones that are set in such a way that motivates all to take action now.

A fair contribution is one that sets a target that is based on current scientific knowledge and will ensure that global warming is kept below 2°C rise above preindustrial levels. It would also be one where all emitters meet the cost of their emissions and specific sectors, such as large industry and agriculture, are not subsidised by the tax payer

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?

It is clear from the information provided that the major contributor to New Zealand's emissions is agriculture, comprising almost half of total emissions

Currently the farming sector is not included in the Emissions Trading Scheme and so have no incentive to reduce their emissions. New Zealand taxpayers are expected to meet the estimated \$1.3 billion costs for these emissions. We consider that those who are responsible for these emissions should meet the costs. As the Parliamentary Commissioner for the Environment has stated "if polluters are not paying for their emissions they've no incentive to reduce them".

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?

What you have failed to outline in your discussion document is what the affect will be to New Zealand if we do not reduce the current level of greenhouse gas emissions.

The potential costs through sea level rise and climate induced natural disasters would be significant and have been shown in overseas studies (Stern Review) to be far greater than those costs required to address greenhouse gas emissions.

The reality is that to do nothing or even very little, will cost New Zealand far more than addressing this problem now.

Regarding what target should be set: Based on the statement by the Royal Society of NZ that emissions from industrialised countries need to be reduced by 80-95% by 2050 relative to 1990, then a target of at least 40% by

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2030 relative to 1990 should be set.

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? Given the size and impact of animal agriculture on New Zealand's emissions it is a significant omission not to include any measures to reduce its impact.

Other opportunities such as requiring producers of products to address their impacts through provisions within the Waste Minimisation Act should also be addressed immediately. Significant work has been undertaken by a number of industry bodies and this momentum should not be allowed to dissipate due to the unwillingness of the Ministry to support them through regulations.

Product stewardship programmes can encourage designers and manufacturers to produce products in a more efficient way and to also reduce the impacts of those products throughout their life. Such initiatives would have a positive impact on greenhouse gas emissions.

Summary

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

New Zealand needs to focus on the certainty that to do nothing and to continue on the current path of little or almost no progress towards emissions reduction will lead to a country that will face significant natural disasters; droughts, storms, floods, all of which will significantly affect the country.

New Zealand needs to divest itself of old world paradigms and look to diversify into new low carbon activities. What these are, who knows, but by encouraging innovation and development in new clean technology areas rather than continuing to subsidise the current polluting sectors would result in a far more effective and efficient strategy to address climate change.

We consider one effective way is to require product stewardship of waste materials so that all within products lifecycle are responsible for its impacts. Product stewardship and extended producer responsibility initiatives aim to reduce the environmental impacts of a product throughout its life.

Such initiatives can result in the use of fewer natural resources and the use of waste materials as resources through reuse, recycling and recovery schemes. These initiatives result in reductions in greenhouse gas emissions and should be encouraged and even required as part of an overarching emissions reduction plan.

The Waste Minimisation Act enables the Minister for the Environment to require product stewardship programmes and we consider this ability should be used as soon as practicable. We are concerned with the little progress that has been made in this area by the Ministry despite significant

Other comments

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

We are also concerned with the significant loss of knowledge and expertise within the Ministry for the Environment in the waste area. Senior staff have recently been required to reapply for fewer positions which has resulted in staff leaving or moving to other areas.

This reduction in staff numbers and significant loss of knowledge and expertise will hinder progress in the waste and product stewardship area for many years to come. It will result in loss of momentum the reinvention of wheels and cost both the government and business in the short and long term.