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

Copy of your submission

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Objectives for the contribution

Do you agree with these objectives for our contribution?   No

1b. What is most important to you?
The first two objectives are fine. The third objective should be the first objective because it represents the strategic target, and the other two objectives follow from it. The current third objective wording should be revised. The current wording allows some sectors in New Zealand to argue that we should not address the causes of climate change (mitigation), merely concentrate on adapting to the realities of climate change. Such an approach is irresponsible to take forward to an international agreement because it wrongly addresses effect, not cause. If all nations thought this way emissions and climate change could only worsen.

If New Zealand is to make a real contribution to lowering its (and global) greenhouse gas emissions it is insufficient to "guide" New Zealand to a low emission world. New Zealand must "commit" to achieve lower emissions. That strategic commitment is highly achievable, particularly if agriculture is included in our commitment.

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?
The discussion document states: "...New Zealand has fewer low-cost options to reduce our domestic emissions compared with developed countries." Such a statement is wrong in fact and intent. New Zealand has a wider base to lower emissions compared with other developed countries. Agriculture and energy represent 70% of our greenhouse gas emissions. Substantial emission reductions can be achieved in agriculture. Changes to transport can take place by virtue of our high renewable (low carbon) energy. These options are not readily available to countries such as the United States, China or Australia, far more industrialised and reliant on coal generation for energy compared to New Zealand.

The intention of New Zealand's commitment should be to reduce emissions where we can on our economic base. The nature of our emissions, mainly emanating from agriculture which produces the most potent GHGs, should concentrate New Zealand's emissions reduction effort and expenditure. Combined with transport, the opportunities to reduce greenhouse gas emissions in agriculture mean New Zealand has a wide base and scope to set an ambitious reductions target.

How will our contribution affect New Zealanders?

3. What level of cost is appropriate for New Zealand to reduce it's greenhouse gas emissions? For example, what would be a reasonable reduction in annual household consumption?
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This is the wrong question. It is not a matter of cost; it is an opportunity to reduce emissions, which may well have economic benefits. For example, the wine industry has shown that its commitment to sustainable production has opened and kept open lucrative markets that could have otherwise blamed traditional practices as barriers to market entry.

The way the question is posed, with supporting example, strongly implies that all New Zealanders should suffer to reduce emissions, when most GHGs are not generated by households. Agriculture must form part of the emissions reduction commitment. The cost of lowering emissions should be born by each sector (with government support, since the government is setting emission reduction targets), just as the benefits will go to that sector. Again, the wine industry is an exemplar.

Many emission reductions are low cost, or part of a transition to improved productivity in a carbon-constrained world. For example, by shifting to targeted nutritional agriculture, considerable costs can be achieved while reducing emissions.

The question of cost is looking at climate change from the wrong end of the telescope. It is a huge cost not to commit to reducing emissions (Kyoto Protocol, trade, reputation).

A far better approach to changing behaviour is to emphasise the opportunities for New Zealand and its productive sectors inherent in emissions reductions. Costs are offset by benefits, which should be defined and known. Emphasising cost (or “technical uncertainty”) is unproductive and presents the primary excuse for people and businesses to do next to nothing to reduce GHG emissions. This is not to deny there are costs in reducing emissions, but without due emphasis on trade-off benefits any commitment or agreement will be largely meaningless.

New Zealanders and our productive sectors have shown a willingness to respond to nationally agreed targets and programmes. Agreeing to a commitment target is the first step.

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? Offsets are only part of the policy setting for reducing emissions. New Zealand has the opportunity across its economic base to mitigate production of GHG emissions.

The biggest and most important opportunity for New Zealand to reduce its emissions is attitude. It is a priori to behaviour change. If reducing emissions can be seen by all sectors and communities as a benefit and not just a cost, attitudes and actions will result.

For example, if it was widely accepted that soil conservation and targeted nutrient programmes lower costs and emissions, some low-hanging fruit in agriculture could be harvested. If it was accepted that urban sprawl and motorways have limits, transport emissions can be contained. These and many other attitudinal questions need to be raised, discussed and advanced as realistic trade-offs expressed as benefits as well as costs.

The range of opportunities presented is too narrow and does not exploit New Zealand’s wide economic and social fount to reduce emissions.

Summary
5. How should New Zealand take into account the future uncertainties of technologies and costs when setting its target?
If we have the right policy setting that advances a consensus on benefit and costs, New Zealand can embrace technologies that advance its agenda to reduce GHG emissions - because they will benefit productive sectors and communities. Again, the negative emphasis in the question misplaces the opportunity.

Other comments

6. Is there any further information you wish the Government to consider? Please explain.
The December 2015 agreement is vital for New Zealand and the world. The New Zealand Government must have the clearest mandate from New Zealanders that New Zealand will aggressively reduce greenhouse gases because it is the best interest of our productive sectors and communities. These interests include achieving benefits across our full economic and social base that will outweigh costs. Expressed as a consensual target New Zealand will rightly realise economic, social and community benefits that will inspire other countries. Because we can.