

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.

Contact information

Name	Mark Walkington
Organisation (if applicable)	None – private citizen
Address	██████████
Telephone	n/a
Email	████████████████████

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

No - not really – the third point is fine; the second point should be dropped given that the costs and impacts of our current approach are not managed at all!

1b. What is most important to you?

It needs to be an ambitious target – as New Zealand needs to be (and to be seen) to be fully committed to the need to reduce CO2 emissions.

It is an imperative that the world limits CO2 emissions – New Zealand should be right up front in encouraging all countries to commit to the most ambitious targets – inline with those accepted by the European Union.

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?

Not much ... national differences are a very small matter in the overall scheme of things. We should accept that the OECD nations need to de-carbonise by mid-century and get on with it by accepting a 40% reduction by 2030.

While there seem some particular difficulties for New Zealand (such as too many cows) there are also significant benefits in being New Zealand. These include our ability to move to bio-energy solutions because of our fertile and available land and the chance to leverage our low carbon electricity resources to provide energy solutions in other sectors including moving to electric propulsion as a transport solution.

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?

My understanding is that the adaption of a low carbon economy will cost less than the counter-factual of continuing as we have been and facing the cost and consequences of a high carbon future and its climate implications.

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?

Very little will happen to reduce emissions without strong leads from government including accepting a target and adopting policies and measures to ensure we achieve these.

New Zealand has already missed starting towards a number of low cost opportunities to reduce CO2 emissions. Through lack of ambition, motivation – we currently deserve to be roundly criticised by the international community for inaction when we have so many advantages.

As an example, these opportunities include an uptake of more efficient motor vehicles. The chart below (from the MoT) shows that NZ has stopped its move towards more efficient light vehicles with no reduction in average CO2-e rate in newly registered vehicles over the last 3 years. This is not surprising as NZ has little in the way of policy, targets, incentives or penalties that are aimed at this issue. It has all been left to the whim of the market – this market is strongly influenced by world markets but is also small enough for us to be left with the vehicles the rest of the world is turning its back on.

Compare our lack of progress with that being made in the UK and the EC (2nd chart) which is moving towards a 2020 target at a level of just some 50% of NZ's current level (i.e 95 g CO2-e/km c.f. NZ's 185 g CO2-e/km)

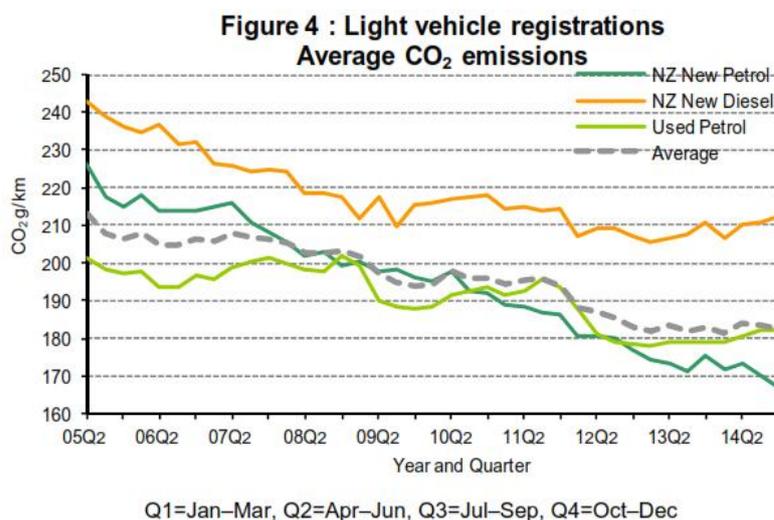
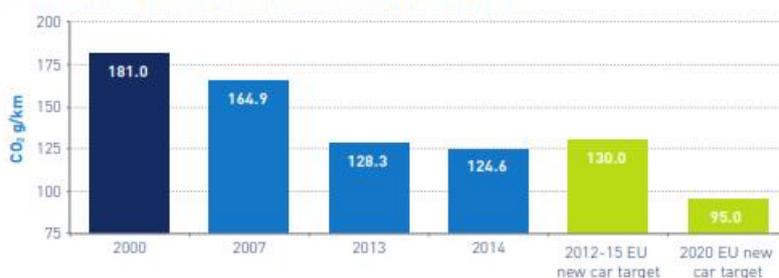


Chart 1 Average new car CO₂ vs EU new car targets



Another example of missed opportunity is in the whole area of bioenergy where there are many low cost opportunities to replace fossil fuel combustion with wood, bio-liquid and bio-gas. I would recommend paying particular attention to the submission from the Bioenergy Association.

Summary

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

New Zealand cannot leave its efforts to reduce CO₂ in the hands of other nations ... just because they can do this cheaper and “economics” suggests this makes theoretical sense. While trading emissions is fine if it can be made to work there are clearly many issues to overcome. So we also need to embark on our own journey to a carbon free future. To do this we need to embrace

- **Bio-energy** – in its many final forms will provide the only approach likely to replace the use of coal and gas for industrial heat processes and provide liquid fuel for heavy transport and aviation. This transition requires government leadership and strongly partnering a nascent industry competing with the “dinsoaur” being the fossil fuel industry. A lot of work and planning in this area has already been undertaken and economic and regulatory assistance is now required to achieve the myriad of economic and environmental benefits an active bioenergy sector would offer.
- **100% fossil-fuel-free electricity.** We have recently been hitting 90% renewables and it will just take a small push to take us to 98%+ and beyond. The technology and fuel is there (i.e. Geothermal, Wind, Solar PV and Battery combined) the government should ensure the early build of the next geothermal power station, the earliest retirement of Huntly and impose a sensible carbon tax to signal/ensure that gas peaking plant should remain just that.
- **Efficient vehicles, liquid biofuels, electric vehicles** – we need to plan and target our path to a low carbon transport future. In particular, Electric Vehicles offer an immediate opportunity to lower our CO₂ emissions but assistance from government is required to overcome a number of barriers that this technology faces in New Zealand. In particular education, leadership, charging infrastructure and “relative” financial assistance – the latter to encourage an earlier adoption than would otherwise be seen and to level the playing field with most other OECD nations.

Other comments

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

I would like the government to benchmark New Zealand’s performance in each part of the emissions sectors against other OECD nations. This will show strong performance in electricity, parity in terms of industrial heat and processes but abysmal performance in transport. Then we could look to Europe and California to see how things can be done.

This comparison will show that much additional investment is needed in enabling electric propulsion for both public and private transport.

As part of a broad plan to move to more efficient vehicles we need to encourage the uptake of electric vehicles – both battery and fuel-cell if these became available. The public need some guidance in interpreting the next step and clear government encouragement of EVs would be a driver for a wider uptake. This encouragement should include education, information and a widespread build-out of vehicle charging facilities including ensuring the availability of simple power sockets in car-parking for slow day-time charging; street and venue charge-points for more incidental charging and a completion of a fast-charging network for inter-city travel and for tourist use.

And just to note – New Zealand was lucky that Mitsubishi and Holden bought their Outlander and Volt to our shores. However Holden have taken it away already and Mitsubishi is struggling with the low level of sales. Why would they and other OEMs bring these vehicles to NZ when other countries offer significant sales incentives for motorists to purchase these sought after vehicles?

My final suggestion is that the government walk away from its involvement with, and subsidy of the oil and gas exploration industry. It is what my grandmother would have called throwing good money after bad and its worse than that! The world has already discovered more Oil, Gas and Coal than it can afford to ever use (4 times more I think?) – what advantage to us adding to the slag pile!

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.

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