4 June 2015

Climate Change Contribution Consultation
Ministry for the Environment
PO Box 10362
WELLINGTON 6143

Wellington City Council’s Submission on the Climate Change Contribution Consultation

1. The Wellington City Council (‘the Council’) welcomes the opportunity to submit on the Government’s Climate Change Contribution Consultation.

2. We do however have some concern about the unusually short consultation period. We would have liked to have had a much longer period of time to consider the issue in more detail given its significance, and work with our communities to incorporate their views into our submission.

3. In addition to the submission points made below, the Wellington City Council also endorses the submission made by the Greater Wellington Regional Council.

Summary

4. The Council recommends that the Government:

   a. commit to an ambitious 2030 reduction target that is linked to longer-term emissions reduction targets for 2050 (of 70% below 2010 levels) and 2100 (zero net emissions) in order to keep temperatures increases well below 2°C of pre-industrial levels given that even a 2°C increase in temperatures will result in significant negative effects, particularly for our Pacific neighbours.

   b. focus New Zealand’s emissions reduction strategy for 2030 on reducing carbon dioxide emissions from energy and transport sectors as well as methane from landfill waste

   c. work with New Zealand businesses and local councils as a matter of urgency to develop and implement a tangible low-carbon plan with real actions for achieving its 2030 emissions reduction target.
A 2030 target based on keeping warming to 2 degrees - pathway to zero net emissions

5. The Council supports the Government’s commitment to the global goal to take collective action to hold temperature increases to below 2°C of pre-industrial levels by 2100.

6. It is noted that many other countries have already set ambitious emission reduction targets, and we encourage that government take a global leadership position on climate change and align New Zealand’s target to international best practice.

7. Setting an ambitious target – and delivering on it – will require some collective leadership and action from Government, local government, industry/businesses and households.

8. The Council notes that the Intergovernmental Panel on Climate Change (IPCC) has stated in its latest synthesis report in 2014 that:

“Emissions scenarios leading to CO₂-equivalent concentrations in 2100 of about 450 ppm or lower are likely to maintain warming below 2°C over the 21st century relative to pre-industrial levels. These scenarios are characterized by 40% to 70% global anthropogenic GHG emissions reductions by 2050 compared to 2010, and emissions levels near zero or below zero in 2100.”

9. Given the Government’s commitment to keep temperatures increases to below 2°C of pre-industrial levels by 2100, the Council believes the Government should commit to a 2030 reductions target that is linked to longer-term emissions reductions for 2050 (of 70% below 2010 levels) and 2100 (zero net emissions) recommended by the IPCC.

10. There is little point in the Government agreeing to the 2°C goal without also committing to emissions reduction targets and strategies/actions necessary to achieve this goal. Committing to the emission reduction pathways recommended by the IPCC is consistent with the Government’s stated objective of having a target that guides “New Zealand over the long term in the global transition to a low emissions world.”

Focus on reducing carbon dioxide emissions with 2030 target

11. In establishing New Zealand’s target and implementation plan for 2030, the Council acknowledges that it is very challenging at the present time to address New Zealand’s agriculture emissions (New Zealand’s largest emissions source at 48%) given many of the technology developments to address agriculture emissions remain untested or unproven.

---

12. However, there are considerable opportunities for reducing carbon dioxide emission sources and methane emissions from landfill waste as noted in the Government’s consultation document.

13. Carbon dioxide emissions (transport and energy emissions) and methane emissions from waste are the dominant emissions profiles of New Zealand’s metro areas. The Council therefore encourages the Government to focus on the following key strategies for achieving its 2030 target:

   a. developing and implementing a plan to reduce carbon dioxide emissions from transport and energy and methane emissions from waste as the priority for emissions reductions for the 2030 target (particularly focusing on New Zealand’s urban, metro areas).

   b. increasing the funding support, and extending the research funding for the Global Research Alliance on Agricultural Greenhouse Gases (GRA) well beyond 2019 in order to retain and attract leading scientists to develop, test and commercialise new products and techniques to reduce agriculture emissions (with a focus on the medium to long-term). By doing this we can pioneer solutions the rest of the world needs, and capture new economic opportunities

   c. converting New Zealand’s marginal farmland into plantation forestry or permanent, indigenous forests.

   d. aligning more strongly government investment for economic growth into sectors of the economy that are smart, innovate and have low carbon emissions, to help diversify the economy and transition away from New Zealand’s over reliance on the emission intensive agriculture sector. Such a strategy is prudent given that:

      - there are uncertainties around the future price of carbon and how it will be applied

      - technologies to reduce agricultural greenhouse gases are uncertain, and

      - investing in the knowledge economy sector will diversify the economy and provide the platform for future economic growth and greater resilience

**Working with metro councils and NZ businesses**

14. The Council urges the Government to start developing a plan to de-carbonise the New Zealand economy that is associated with New Zealand’s emissions reduction target.

15. As stated in the previous section, this plan should focus on delivering tangible results in the next fifteen years (out to 2030) on emissions from transport and energy as well as emissions from waste – the key emissions sources of New Zealand urban areas. A key part
of the plan will be identifying and agreeing to the costs of achieving the plan (and who pays).

16. The Government has partners who are ready to collaborate to develop and implement a low-carbon for New Zealand and New Zealand’s metro areas. Many of the large metro councils such as Wellington, Auckland and Christchurch have agreed climate plans for their cities and are actively working towards delivering on those goals. Wellington City’s target is to reduce emissions by 30 percent by 2020 (on 2001 levels), and by 80 percent by 2050 (on 2001 levels). We are pleased to note that the city’s emissions are on the downward trend.

17. In addition, New Zealand businesses are starting to make commitments to developing low-carbon products. Examples of this include Z Energy’s commitment to develop biofuels, Mighty River Power’s commitment to electric vehicle technology, Air New Zealand’s commitment to developing low-carbon aviation fuels and recent developments relating to solar PV financing offers.

18. The Council believes that the Government has relied too heavily on the NZ Emissions Trading Scheme (NZ ETS) alone for achieving emissions reduction goals. Whilst the Council is supportive of the NZ ETS (and acknowledges that a price on carbon will be instrumental to achieve emissions reductions), the Council believes a broader plan is needed to address emission sources, particularly from transport and energy.

19. For each area of focus of the Government’s plan, the Council recommends the Government describes the estimated emissions reductions that will be achieved. Areas of focus for the plan could include:

   a. transitioning toward an electric transport system by 2030
   b. supporting active modes of transport to reduce emissions and support healthy lifestyles
   c. developing the plan for how New Zealand will achieve the 90% renewable electricity target by 2025
   d. developing a plan for how biofuels will be substituted for diesel by 2030
   e. introducing vehicle fuel efficiency standards within the next 5-10 years
   f. introducing broader energy efficiency programmes and standards for commercial buildings, and rental and private housing
   g. introducing policies and investment to support compact, urban growth in New Zealand urban metro areas
h. increasing investment for public transport and cycling infrastructure for New Zealand urban metro areas

i. increasing development of forest sinks, particularly on marginal farmland.

**The cost of inaction is not appropriately recognised in the consultation document**

20. The Government’s consultation document focuses almost entirely on the costs of meeting targets as opposed to the costs to the New Zealand economy if worst-case climate impact scenarios eventuate.

21. The Council acknowledges that there will be a cost to the New Zealand economy for achieving emissions reductions targets. However, the cost on inaction will also be significant, and this is not discussed or quantified in any level of detail in the consultation document, and therefore an unbalanced – and unfair – position has been presented.

22. Council believes the Government should be guided by the key recommendation of the Stern Review: Economics of Climate Change: the benefits of strong, early action on climate change outweigh the costs. Recommendations from the Stern Review and similar recommendations from the IPCC’s 4th Assessment Report indicate that the overall costs of climate change impacts (i.e. the cost of inaction) will have much more severe effects on global GDP compared to the costs of up-front action. New Zealand Treasury calculates the cost of inaction on climate change may be between $3 billion and $52 billion from 2021 to 2030.

23. While it is well established that lack of mitigation will simply increase the cost of adaptation, it is also worth noting that the costs of adaptation largely falls to councils because of the impact adverse weather events and higher seas will have on civic infrastructure e.g. roads, seawalls, underground networks etc.

24. In addition, the consultation document does not reflect the social and economic benefits and opportunities that come with responding to climate change. This includes:

- **emission reduction** – better quality air, greater energy security, better health for people, reduced road congestion, and more liveable cities that are attractive to migrants

- **economic transition** – more sectors of the economy developed as platforms for future growth, less reliance on agriculture which is a large emitter, as well greater economic resilience because of better economic diversity.

---

25. We encourage the government to consider these benefits and opportunities in more detail as part of developing New Zealand’s emissions reduction target and action plan.

Conclusion

26. We encourage the government to take a global leadership position on climate change, align New Zealand’s target for emission reduction to international practice, and collaborate with the business and local government sectors to map out a pathway to reduce New Zealand’s carbon emission profile.

27. Thank you again for the opportunity to comment. While no oral submissions are scheduled for this consultation, we are happy to engage further with the Ministry for the Environment on this important issue.

Yours sincerely

Celia Wade-Brown
MAYOR OF WELLINGTON

David Lee
Portfolio leader
CLIMATE CHANGE COMMITTEE

Iona Pannett
CHAIR
ENVIRONMENT