CLIMATE CHANGE CONTRIBUTION CONSULTATION

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General comment:
The consultation document gives the impression that the government is looking to make the least contribution it can get away with, using our renewable generation and NZ’s percentage of overall emissions globally as two supporting factors for a minimum contribution. The consultation document is full of conservative measures, places emphasis on the supporting the economy at all costs and lacks innovation or leadership.

The document is also written in a way that would intimidate most people. Unless a person has a good understanding of climate change, the Paris conference and NZ’s emissions profile, this document would be difficult to comprehend. The timeframe for the consultation period has also been too short, and the public profile of the consultation process has been incredibly inadequate. The campaign for a new flag, which has zero impact on the wellbeing of New Zealanders nor the natural environment which we rely upon to exist, has exceeded this on both abovementioned points. This indicates the government places little priority on something the rest of the developed world appears to take quite seriously.

Q1: Objectives for contribution
I do not agree with the objectives for contribution as provided in the consultation document.

My priorities for NZ’s objectives for contribution are as follows:

1. The NZ government recognises we live in a society, not an economy, and that we depend on our natural resources for existence of both.
2. Costs, impacts and benefits are recognised and measured in terms of society, natural resources as well as monetary and are considered for the short, mid and long term.
3. The NZ government recognises its role as a global citizen and takes responsibility for its contribution to reducing emissions by aiming for an integrated cross sector approach that achieves a lower carbon future.

Q2. What do you think the nature of NZ’s emissions and economy means for the level of target we set?

The NZ government has an opportunity to demonstrate innovation and show leadership at the Paris conference by acknowledging responsibility as a global citizen and to contribute in a way that accurately address the area’s most responsible for (NZ’s) emissions. Protecting the economy at all costs does not make sense. NZ needs to have a vision for a future that supports our communities, our industries and our standard of living based on the
foundation of a diverse natural environmental with capacity to regenerate, it is nonsensical to imagine anything different.

Although our contribution to carbon dioxide emissions per person are ‘lower than other developed countries such as the Australia and the United States’ – our result is still recognised as poor (CCPI Climate Change Performance Index 2015). So this comment in the consultation document is misleading. While NZ is not considered as one of the top 10 largest emitters, the United States is, therefore benchmarking ourselves against this country is not a positive reference. In fact, NZ is slipping down the scale to a ‘very poor’ rating, currently sitting within the worst 1/3 of all countries measuring their emissions. Therefore our negative contribution has been largely underrepresented in the consultation document.

With this in mind, NZ needs to address reducing carbon dioxide emissions with the understanding that we are not currently performing in any way positive towards reducing our emissions; yet we quite clearly know where we can make a difference.

Q3. What level of cost of appropriate for NZ to reduce its greenhouse gas emissions? For example, what would be a reasonable reduction in annual household consumption?

The way this question has been worded is extremely misleading. The social and financial benefits of reducing emissions are far greater than any initial financial cost – this is well understand internationally by countries which have adopted genuinely ambitious and necessary targets. The perception that an emissions reduction target will burden the NZ public is disingenuous. Furthermore, the NZ government has continued to take a light approach to resource use and waste by the residential sector, and an even lighter approach to the commercial/industrial sector. This needs to change for NZ’s contribution to be meaningful and impactful.

Residential:
There are huge gains to be made through more effective and efficient use of energy that are achievable for minimal cost if the leadership was there. A warrant of fitness for all housing would be a great place to start. The cost benefit to health alone would justify government intervention, as well as the resource efficiency that would eventuate if housing in NZ was raised to a minimal standard of thermal performance. State housing covers only approximately 68,000 houses in NZ, the private rental sector, now grown larger by the governments withdrawal from social housing is a huge area of concern and opportunity. Reducing household consumption would be achieved by:

- Raising the building code for new builds and renovations to something that resembles effective and efficient design, materials and construction practices already adopted in the rest of the developed world i.e. our insulation standards are incredibly ineffective. The NZ Building Council has already produced this work through Homestar – Auckland Council requires a minimum 6 stars for its special housing area – the NZ government needs to acknowledge this and initiate a new national standard.
- Phasing in a warrant of fitness for all properties, starting with rental properties so that all properties have the capacity to be warm, dry and safe. Standards for heating
appliances should also be included based on efficiency, and unflued gas heaters need to be banned. The work to establish a warrant of fitness has already been completed by Otago University and NZ Green Building Council.

- A warrant of fitness for sale of all private properties should follow.
- Incandescent light bulbs should be banned from sale in NZ.
- Cost of consumer goods should reflect the embodied energy i.e. locally grown or produced food should cost less than imported.
- NZ’ers can reduce their reduce use through efficiencies and effective use of energies providing this is supported by the government, see response to question 4.

We have a high percentage of renewable energy generation in NZ – but that doesn’t negate any responsibility to ensure the energy we use is effective and efficient in delivering the essential services required (i.e. warmth).

Business:
The consultation document reflects an attitude by the NZ government that business needs to be protected against any emissions target. The way we do business in NZ needs to change and the true cost (social and environmental) needs to be identified, recognised and accounted for. The focus of this section in the consultation document is worded so that the general public will fear emission targets because of the cost they will be forced to bear the brunt of. This is misleading. There are businesses all over the country identifying, recognising and accounting for their emissions although they are not acknowledged by the government as leaders, nor do they receive any incentives because of it, whereas business that continue to grow regardless of any social or environmental costs do. The balance between growth and social/environmental costs is completely wrong and unless that changes NZ will only ever be making a token gesture contribution to a global emissions reduction. The NZ government should:

- Raise the building code for new commercial and industrial buildings (and renovations) to something that resembles effective and efficient design, materials and construction practices already adopted in the rest of the developed world i.e. micro renewable energy generation.
- Regulate against pollution by industrial processes.
- Incentivise smart system design that incorporates cyclical processes.
- Introduce lighting standards that ban the use of incandescent light bulbs and adopt other smart technologies which allow for natural light and ventilation.

Q4. Of these opportunities which do you think are the most likely to occur, or be most important for NZ.

- Micro energy generation (i.e. solar PV) has not been identified as an opportunity in the consultation document and it needs to be.
- As mentioned above (Q3), fuel and energy efficiencies from the commercial and residential sector are achievable providing there is leadership which supports both an incentivised and regulatory model.
- Our high level of renewable energy generation is a positive but in this context provides a false perception that we have little to worry about. There needs to be support for solar generation from the NZ government – this is a crucial part of our energy generation structure. This is true for both the residential and commercial sectors – more so for the commercial sector. The focus needs to be on supporting consumption, not feeding back into the grid.

- Electric vehicles do have a place in a lower carbon future for NZ. This presents another viable argument for solar generation across all sectors. Infrastructure for electric vehicles needs to be supported by the government.

- Cycling as a form of transport (as opposed to recreational cycling) also needs to be better supported through highly visible and safe infrastructure.

- More efficient and effective public transport options need to be prioritised over increasing freight routes.

- A shift in the public’s perception about our individual responsibilities (i.e. electricity and fuel use), but will not come if the government continues to focus on our high renewable generation as our saving grace. This is misleading.

Q5. How should NZ take into account the future uncertainties of technologies and costs when setting targets?

The NZ government could start by following internationally proven best practice when it comes to addressing the basics (i.e. renewable electricity generation via solar PV as well as reducing fuel consumption through alternative forms of transport). Technologies won’t change behaviours to the level necessary for NZ emissions to reduce back to 1990 levels and it’s foolish for the NZ government to assume they will. The transformational change that needs to happen will only when people take ownership of their actions and their impact. NZ has a small population, leadership is what’s required to shift perception and behaviour.

The situation is complex, but made more so by the government placing the economy as priority and by expecting more growth from the same or less resources.

Plan for unknown technologies by looking at the rest of the world. New Zealand is lagging behind and missing opportunities because of an arrogance around our ‘high level of renewable energy generation’. Plan for it by being a part of the emerging technologies – these will challenge the status quo, but we have quite clearly not been progressing with the current mentality as our emissions have been steadily climbing past 1990 levels.

Recognising we are a global citizen with a significant role to play around emissions reduction is a necessary acknowledge by the NZ government. Supporting solar generation, alternative forms of transportation for commercial activity as well as community (electric vehicles, public transport, cycling, rail) looking at our housing (existing and new builds) as well as commercial and industrial buildings will make a difference – it will just take leadership.