

# New Zealand's Climate Change Target

Our contribution to the new international climate change  
agreement - summary of consultation  
responses



*Ministry for the*  
**Environment**  
*Manatū Mō Te Taiao*

## Disclaimer

All reasonable measures have been taken to ensure the quality and accuracy of the information contained in this report. The Ministry for the Environment received over 17,000 submissions in total. Over a thousand people submitted multiple times. Once these duplicates have been merged, the total number of submitters is 15,639. This report contains summaries of the views expressed through these submissions.

The views expressed in this report do not necessarily represent those of the Ministry for the Environment or the New Zealand Government.

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## Introduction

The Government consulted on a climate change target between 7 May and 3 June 2015. The consultation focused on what *international target* the Government would contribute to the new international climate change agreement as part of its “intended nationally determined contribution” (INDC). The discussion document asked stakeholders to respond to the key issues needed to inform the decision, rather than options for the target itself.

Over this period, 15 public meetings and hui with iwi and hapū were held in 11 locations across the country with approximately 1,700 people attending. The Ministry for the Environment received over 17,000 submissions in total. Over a thousand people submitted multiple times. Once these duplicates have been merged, the total number of submitters is 15,639.

It is important to note there was strong criticism about:

- the consultation process, including the short notice, insufficient advertising and number of public meetings, with a particular concern from Iwi/Māori and councils that the short timeline left them unable to engage effectively
- the information provided in the *Discussion Document*, in particular about the representation of the costs, and the need for more information for stakeholders to make an informed submission.

In addition, there was a strong level of emotion expressed in the public meetings and written submissions. This included passion about climate change and anger about New Zealand’s response to date.

## Who responded to the consultation?

Of the 17,000 submissions received, approximately 1,500 of these were unique<sup>1</sup> and the remainder were 'pro-forma' submissions (drafted by particular organisations/groups and submitted by individuals)<sup>2</sup>.

Around 85% of the unique submissions were from individuals, with the remainder from: iwi, hapū or Māori organisations, forestry and agriculture stakeholders, business and industry, local government, political parties, academics and environmental consultants, non-government organisations (NGOs), and health professionals.

The pro-forma submissions were created by the Green Party of Aotearoa New Zealand, Greenpeace, Generation Zero, the Deconstructing Paris Project<sup>3</sup>, the 350.org Movement and the Waikato Environment Centre. The majority of these came from the Green Party, Greenpeace and Generation Zero.

## Key themes from the consultation

### Overall themes

Some of the most common themes from the consultation were the following:

- Climate change is an important issue the Government should address urgently to protect New Zealanders, future generations, and neighbouring Pacific Island countries.
- There was a strong call for an ambitious target and leadership from the Government (the most common target suggested by stakeholders was 40% below 1990 levels or a target of zero carbon by 2050). Many related taking ambitious action to protecting our international reputation.
- Businesses and other stakeholders want greater involvement and engagement on climate change.
- A large majority of stakeholders highlighted that a target needs to be underpinned by a domestic plan.
- There were frequent requests for cross party consensus and an independent commission on climate change.

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<sup>1</sup> Where an individual submitted a unique submission as well as one (or more) pro-forma submission, these submissions have been merged and counted as 'unique' in the final totals.

<sup>2</sup> Many submitters made amendments to the template pro-forma submissions. The Ministry for the Environment has included these additional comments in its analysis of submissions. However these adapted submissions have not been included in the total figure given above for 'unique' submissions.

<sup>3</sup> Deconstructing Paris is a collaborative project undertaken by practicing lawyers, academics and law students at Victoria University of Wellington, which aims to deconstruct the draft text and negotiations in the lead up to COP21.

- Strong concern was expressed that New Zealand is currently not doing enough to reduce emissions.
- Strong concern was expressed that the costs described in the discussion document were misleading and did not consider possible benefits of acting or the costs of inaction.

## Comments on target

Around 10,900 respondents commented on the level of target that New Zealand should table as part of its contribution. Of these, around 10,600 provided suggestions on the specific (quantitative) target New Zealand should submit. Table 1 provides an overview of the different targets that were suggested by different submitters.

**Table 1: Summary of submitters who recommended a target level (around 70% of total submissions)**

Target	Percentages
40% below 1990 and higher	68.7%
Zero (mainly carbon dioxide) emissions by 2050	27.2%
40% below 1990 + zero carbon emissions by 2050	3.2%
20% below 1990 levels and higher (up to 40%)	0.5%
10% below 1990 levels and higher (up to 20%)	0.2%
below 10% below 1990 levels	0.1%
Other	0.2%

## Ambitious target

As shown in Table 1, the vast majority (99%) of those who specified a target level recommended New Zealand takes an ambitious target of 40% below 1990 by 2030 or zero carbon by 2050. While a large number of these were pro-forma submissions, the unique submissions also heavily favoured these two target levels.

A further 165 submitters suggested New Zealand's target should be "ambitious", without providing a specific quantitative number.

The main reason identified for an ambitious target was that ambitious action is urgently needed to avoid the harmful impacts of climate change. A number of submitters felt that action on climate change was a moral responsibility. Many related their response to needing to avoid a temperature rise of more than two degrees. Other issues highlighted included protecting our vulnerable communities, neighbouring Pacific Islands and future generations. A number of submissions stressed that taking little or no action now would simply defer costs to the future, for example:

- *"As time goes on without action the path gets steeper."* (Climate Change Iwi Leaders Group, 9597)
- *"Emission reduction targets are not the end we seek but one of many indicators of the progress we are making toward achieving a high quality of life with a zero-net-emission economy."* (Individual, 4736)

A wide range of submitters related our target (and action on climate change) to our “clean and green” reputation and image; they considered this an important characteristic of how New Zealand is perceived as a country. Many felt the role New Zealand plays internationally is important, and consequently our targets need to be as equally ambitious as other countries. Almost 3,500 submissions highlighted they would like to see New Zealand as a “leader” on climate change, for example:

- *"Our view is that a small country like New Zealand can have a disproportionate impact on global climate ambition when we take vigorous and ambitious action, and this will have a globally beneficial effect in terms of climate outcomes..."*  
*"...Leaving mitigation of climate change to others is also not an option for a country whose international reputation, and so overseas trade opportunities and our economy, depend on maintaining a clean green image." (Group of academics, 9094)*
- *"Without a strong commitment from New Zealand which has a respected reputation on the environment, I fear there is little hope of achieving a binding global agreement from developing nations facing a far harder challenge." (Individual, 4476)*
- *"I urge you to show your strength by making bold and ambitious targets. I urge you to show love to the little players. I urge you to step on toes, to stand out as a point of difference and show once again that NZ can be a world leader in the way that it promotes the rights of all individuals, not just those with the loudest voices." (Individual, 9030)*

### Modest/realistic target

In addition to those shown in Table 1, a further 19 submitters suggested we table a more modest or realistic/achievable target, without specifying a level. Common reasons provided were to avoid impacting the competitiveness of New Zealand businesses, which could result in businesses moving offshore with potentially more emissions intensive practices (also known as “carbon leakage”); and to ensure we take on a similar level of cost to other countries. Other reasons included the small size of New Zealand’s emissions or a need to focus on adaptation rather than mitigation.

- *"When considering what INDC target to set for New Zealand, we need to remain cognisant of the sectoral ability to achieve this without detrimentally affecting the domestic and export competitiveness of the businesses within New Zealand." (New Zealand Steel, 4727)*

### No target

Around 0.5% of all submitters who commented on the target level suggested that no target should be tabled at all. The majority of these submitters questioned the science of climate change, with most believing either that the climate is not warming and/or that human activities are not responsible.

### Target type (or coverage of different greenhouse gas emissions)

Submissions from Generation Zero, including around 2,500 pro-forma submissions, emphasised the need to focus on carbon dioxide as the long term driver of climate change. These submitters

consequently recommended a target of zero carbon dioxide emissions by 2050. A recommendation for a zero carbon target was also highlighted by a large number of unique submissions<sup>4</sup>.

- *“Regardless of what we do about other emissions from agriculture, every country ultimately needs to reduce CO2 emissions to zero to stop climate change and avoid blowing the global carbon budget. That means shifting from fossil fuels to clean energy and planting forests to absorb carbon.”* (Generation Zero Pro-forma submission)

In addition to this, a number of submitters (particularly from the agricultural sector), recommended a target with an alternative treatment for the agriculture sector. Nevertheless, many other submitters emphasised it is important to include all sectors/all gases within the target including agriculture (see ‘national circumstances’ below for further information).

## Domestic policies

Although the consultation focused on the international target, many stakeholders provided feedback related to domestic policies. Some of the key points included the following:

- Ensuring the target is based on a **domestic plan**. This was a core theme expressed by stakeholders and was raised in around 14,500 submissions. For example:
  - *“Setting New Zealand’s INDC will possibly be the most important decision Ministers will make this year because of the economic and fiscal costs it will end up imposing on New Zealand. But by the same token, it is in New Zealand’s long term interests to continue to take steps towards a low carbon future. Key to this is a plan over the long term that achieves leadership on reducing emissions while delivering economic growth, investment and jobs.”* (Business New Zealand, 4710)
  - *“Target setting alone is not enough...”*  
*“SBC [Sustainable Business Council] members want to see integrated government and business priorities and real, integrated long term solutions (ie, beyond 2030) that tackle New Zealand’s unique emissions profile.”* (Sustainable Business Council, 4694)
  - *“There is no point in setting targets unless a plan (with milestones) is set in place to achieve them”.* (WWF – New Zealand, 4498)
  - *“Without a real action plan to reduce climate pollution, the Government risks damaging our global reputation and wrecking our economy. But most importantly, they are denying New Zealanders the cleaner, smarter and safer future that we all deserve. I want to see meaningful policy changes that will start cutting New Zealand’s emissions during this term of government.”* (Individual, 4187)
- Over 3,300 submitters expressed the need for **consensus** to be built around climate change. A number requested a collaborative stakeholder process and many suggested the initiation of a Climate Change Commission, cross party consensus on the issue, and/or that this be underpinned by domestic climate change law. For example:
  - *“Putting New Zealand on a long-term low-carbon pathway means putting our emissions targets at the heart of decision-making and maintaining a coherent government-wide effort*

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<sup>4</sup> Note it was not always clear whether the submitters were referring to ‘carbon dioxide’ or all greenhouse gases more broadly.

*to deliver on them. This could be achieved by enacting similar legislation to the UK Climate Change Act, which puts national emissions targets into domestic law and requires each successive government to report on its progress and plans...”*

*“... A Climate Commission will fill a critical niche in New Zealand as an authoritative and independent voice on climate change policy. This will help depoliticise the issue, which we believe many New Zealanders want to see.” (Generation Zero, 10450)*

- There was concern current policies are not enough, and the New Zealand Emissions Trading Scheme (NZ ETS) needs to be strengthened or replaced with a carbon tax.
- Many stakeholders considered that more information about New Zealand’s longer term carbon pathway is necessary to build policies and targets from the “bottom up”.
- There was a wealth of ideas and examples for domestic policies that New Zealand could implement. Common themes included aiming for a 100% renewable electricity target, providing a moratorium on fossil fuels, investing in or incentivising use/development of public transport and forestry and the need for more education on climate change.
- Many stakeholders highlighted the opportunities associated with using our abundant renewable energy to our advantage, incentivising electric vehicles and use of biofuels. For example:
  - *“New Zealand is ideally placed to take advantage of an early transition given our world-leading and subsidy free renewable electricity.” (Mighty River Power, 9247)*
- While some supported the use of carbon markets to meet targets, many did not, and a number raised caution about managing the use of markets and ensuring they have environmental integrity. For example:
  - *“We support access to genuine international emission reductions as a cost effective means of meeting national targets. Continued access to international permits will be an important part of future policy. This will involve striking the balance between managing short term costs through access to such units and also encouraging longer term structural adjustment of the domestic economy.” (Origin Energy, 886)*
- The Parliamentary Commissioner for the Environment also made two recommendations related to domestic policy, but with respect to what is included within the INDC itself, namely:
  - *“...to the effect that a collaborative process for developing a plan for moving New Zealand toward a low-carbon economy will be established”.*
  - *“...that the Government will limit the purchase of carbon units to those that represent real and verifiable emission reductions.”*

## Feedback from iwi/Māori

Submissions were received from 16 iwi or hapū as well as from the Climate Change Iwi Leaders Group. In addition to the six scheduled hui, officials from the Ministry for the Environment also met with iwi in Auckland and Napier through joint Iwi/council meetings.

Overall, there was concern from many iwi/Māori about the short time and notice of the consultation restricting adequate engagement with iwi/Māori. Commonly, submissions highlighted:

- The importance of kaitiakitanga and a holistic environmental world view (with a particular concern that the interrelationships between the environment, food and culture are threatened by climate change).
- That climate change is a symptom of broader problems of sustainability.
- Equity is important both internationally when setting the target and domestically when implementing it. In particular, there was a concern for protecting vulnerable communities from the impacts and costs related to climate change.
- The strong imperative to act, to protect future generations “*mō tātou, ā, mō kā uri ā muri ake nei*” [For us and our descendants after us] (Ngāi Tahu, 9261)
- That forestry should be part of the solution and there should be support for agriculture to transition to more sustainable techniques.
- Many felt that the NZ ETS has not been effective and needs to be fixed.
- That the INDC should recognise and be consistent with the Treaty of Waitangi. This was a view also expressed more broadly in the consultation by over 100 submitters.
- The need for an ambitious target to protect the environment, which in turn protects human wellbeing.
- Some concern about the environmental integrity of international markets and ensuring that New Zealanders benefit from the improved health and environment that would come from domestic action.

The Climate Change Iwi Leaders Group (submission number 9597) highlighted the need for strong political leadership on this issue. Some of the key messages within their submission were:

- The need for an **ambitious** target that is in line with the European Union, USA and China.
- Concern that the impact of climate change and actions to address it will have **disproportionate impact on Māori communities**. Previous research and analysis has established the impact of climate change and emissions reduction measures both have an impact on the Maori population that is disproportionate to the known bases for comparison with the non-Maori population.”
- Desire to **work further with Government** to develop domestic policy, including support for vulnerable communities.

## Feedback from stakeholder groups

overleaf highlights key themes from some stakeholder groups.

In addition, submissions were received from the following political parties:

- New Zealand Labour party
- Green party of Aotearoa New Zealand
- NZ Climate party<sup>5</sup>
- Alliance party.<sup>4</sup>

The **Parliamentary Commissioner for the Environment** also provided a submission, emphasising the need for a domestic plan and stronger domestic response on climate change.

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<sup>5</sup> Note the NZ Climate Party and the Alliance Party are not currently registered political parties.

**Table 2: Some key themes from submissions**

Group	Number of Submitters	Some key themes from submissions
<b>Business and industry</b> (excluding agriculture and forestry)	39	<p>Submissions from business and industry were diverse. While some outlined the benefits of early action, the importance of ambitious targets to protect our reputation, and opportunities for New Zealand of transitioning to a low carbon economy, others suggested a more cautious approach and were concerned about costs.</p> <p>A few themes included the following:</p> <ul style="list-style-type: none"> <li>• The need to take a ‘fair’ target comparable with other countries (including on an equal cost basis).</li> <li>• Concern about the impact on export competitiveness (and the potential for “carbon leakage”).</li> <li>• A desire from business to be involved in developing policies or a plan to meet our target – particularly from Business New Zealand and the Sustainable Business Council.</li> <li>• Many submitters from business and industry agreed with the “least cost approach” to meeting targets (ie, through market mechanisms) and were concerned about costs to the economy of targets or higher carbon prices.</li> </ul>
<b>Agriculture stakeholders</b>	10	<p>Agricultural stakeholders generally recognised the need to act to address climate change, but expressed concern about the impact of setting targets on the agricultural industry.</p> <ul style="list-style-type: none"> <li>• Many considered that “on farm” biological emissions should be treated differently to the rest of the economy in New Zealand’s target.</li> <li>• There was concern that placing costs on farmers would have a high economic impact for New Zealand.</li> <li>• Most suggested that New Zealand’s target should be conditional on some or all of:             <ul style="list-style-type: none"> <li>○ availability of technologies in agriculture</li> <li>○ access to markets</li> <li>○ rules of the international agreement</li> <li>○ the action of other countries.</li> </ul> </li> <li>• Submissions generally provided strong support for further research and innovation, and sharing this knowledge with countries overseas to reduce emissions globally.</li> </ul>

Group	Number of Submitters	Some key themes from submissions
<b>Forestry stakeholders</b>	12	<p>Forestry stakeholders were keen to highlight their role in the transition to a low carbon economy.</p> <ul style="list-style-type: none"> <li>• They suggested that to meet a bold contribution there should be a focus on forestry in the short term, while developing technology in agriculture over the longer term.</li> <li>• Many considered it is not credible for New Zealand to subsidise emitting industries and rely on the purchase of international units.</li> <li>• Submissions highlighted that it is important to consider the co-benefits as well as the costs.</li> <li>• Submissions noted that forestry needs stronger Government policy to incentivise the scale of new planting needed.</li> <li>• Many commented on the NZ ETS and had suggestions for its settings.</li> </ul>
<b>Local government</b>	8	<p>Submissions from local government often expressed concerns about the increasing costs of inaction and adaptation, and the impacts that climate change will have on regions. Some councils raised concerns about being unable to submit in the short consultation timeframe.</p> <p>Many called for ambitious targets to be based on ‘science’.</p> <ul style="list-style-type: none"> <li>• Some noted the importance of the ‘national brand’ and clean, green image for tourism.</li> <li>• There was a strong call for a domestic plan and some concern that offsetting does not help the New Zealand economy.</li> <li>• Some councils suggested a focus for reducing emissions from non-agricultural sectors.</li> </ul>
<b>NGOs</b>	67	<p>Submissions from Environmental NGO’s often were quite critical of the modelling and information provided in the discussion document, and stressed the importance of acting on climate change.</p> <p>Some of the key themes were:</p> <ul style="list-style-type: none"> <li>• That New Zealand has a responsibility to act because of our strong economy and high per capita emissions, as well as the moral nature of the issue and ethical imperative to act.</li> <li>• That New Zealand’s clean, green reputation is important, and concern this reputation is being eroded.</li> <li>• An ambitious target is needed. Many called for 40% below 1990 levels by 2030.</li> </ul> <p>There is a need for transparency around the consultation, and decision-making process as well as a domestic plan and cross</p>

Group	Number of Submitters	Some key themes from submissions
<b>Health professionals and associations</b>	30	<p>The consultation received a significant proportion of feedback from health professionals.</p> <p>Submitters highlighted:</p> <ul style="list-style-type: none"> <li>• Concern that health considerations did not feature in the discussion document or in climate change policy more broadly (including Health Impact Assessments).</li> <li>• That urgent and ambitious action is vital for health, equity, human rights and climate justice and that the precautionary principle compels us to act now.</li> <li>• That action on climate change improves health and wellbeing (resulting in costs savings), which should be given as much weight as costs to the economy in climate change policy.</li> <li>• A desire to be more strongly engaged in climate change policy, including a request for a parliamentary ‘climate change and health’ summit and more involvement by the Ministry of Health.</li> </ul>
<b>Academics and research organisations</b>	44	<p>The foci of academic submissions varied, however, a number of submissions highlighted the need for a long term focus in regards to climate change.</p> <p>Some ideas highlighted:</p> <ul style="list-style-type: none"> <li>• That New Zealand’s action should be consistent with its long-term trajectory, including moving towards its 2050 target.</li> <li>• That carbon dioxide is an important driver of temperature rise, and that an appropriate long term target for New Zealand and globally may be a zero carbon dioxide target by some date in the future.</li> <li>• That low-carbon pathways entail a number of co-benefits and can lead to technological improvements that reduce costs and spur further economic innovation and growth.</li> </ul>

# Responses to “New Zealand’s Climate Change Target – our contribution to the new international climate change agreement - discussion document” by question/theme

## Objectives

Around 1,100 people commented on the Government’s proposed objectives. Around 70% of those respondents agreed, or partly agreed, with the objectives.

Of those who expressed a preference, the majority considered Objectives 1 (that the target be fair and ambitious) and/or Objective 3 (long term transition) more important than Objective 2.

Many submitters did not agree with the objectives and considered them vague or unclear. Some common suggestions on the objectives were:

- Objective 1 should be framed that “New Zealand is ambitious and fair” not that it “is seen to be.”
- Objective 2 should include benefits (ie, that the costs, benefits, and impacts are appropriately managed).
- Objective 3 should provide a greater sense of urgency about the need to act in the short term as well as long term (ie, that it guides New Zealand in the short and long term transition to a low emissions world).
- Many submitters provided other information about what was most important to them. Some common topics raised were leadership, equity, taking urgent and bold action (grounded in science), taking a “fair” target on a per capita basis, protecting future generations, and achieving domestic emissions reductions in New Zealand. For example:
  - *“Iwi leaders are seeking strong political leadership aligned to the objectives [for New Zealand’s (INDC)]; towards stable domestic climate change policy that takes a long term view, is fair and equitable to the interests of iwi and will transition New Zealand towards a low emission economy.”* (Climate Change Iwi Leaders Group submission, 9597)
  - *“That New Zealand takes significant, immediate action to address this most serious issue. Sacrifices will have to be made for the greater good - it's not easy but some hard choices now will lessen the impacts we'll get later on.”* (Individual, 9224)

## National circumstance

Around 1,000 submitters responded about the nature of our natural circumstance when setting our target. Of those:

- Around half felt the nature our national circumstances meant that we should “do more” (ie, table a higher target than previously). Some common reasons for this were that New Zealand is a relatively wealthy country with the capacity to table a higher target, that we have high per capita emissions, and that our economy is vulnerable to the impacts of climate change.
  - *“As New Zealand is a developed country, it is reasonable to expect us to reduce emissions by more than other countries with fewer resources.”* (Individual, 4206)

- Around a quarter felt that the nature of our circumstances is irrelevant to setting our target (or rather, our national circumstances should not be used to justify less action). Many submitters considered the discussion document overstated the challenges associated with our national circumstances, and suggested it should have emphasised opportunities that we do have, particularly in the energy and transport sector. A number of submitters noted that all countries have unique circumstances.
  - *"The well-worn, two decades-old list of constraints and uncertainties - explaining what New Zealand can't do - should be ditched in favour of a more positive narrative of what NZ can do. We should not have to apologise for having 80% and growing renewable electricity, for example."* (Individual, 9122)
- Around ten per cent suggested our national circumstances mean we should take different levels of action within different sectors. Of these submitters, some emphasised the opportunity or flexibility provided in the negotiations to better design our target to suit our national circumstances.
  - Of these, some submitters highlighted the importance of reducing carbon dioxide emissions to net zero within the next thirty years, and consequently recommended a target focused on carbon dioxide emissions (over methane/nitrous oxide).
  - Some submitters suggested different targets for different sectors. In particular, most submitters from the agriculture sector (around 90%) recommended an absolute target for sectors other than agriculture and an "alternative approach" for the agricultural sector (for example an intensity based approach). For example:
    - *"The target for agriculture is uncertain and difficult to establish.(individual 9211)... "We can however, with existing knowledge and technologies, establish targets for all the other sources of greenhouse gas (GHG) emissions without necessarily destroying our economy. The target for all these other sectors must be zero."* (Individual 9211)
    - *"If we were to adopt separate reduction targets for major sources such as agriculture, transport, electricity generation, industry we might help us move forward more effectively."* (Individual, 2400)
    - *"Policies that impose costs on farmers that are unable to be mitigated are likely to displace food production to less-efficient producers, resulting in a net increase in global emissions. To address this risk, Fonterra believes that an intensity approach should be considered as part of an alternative framework to address agricultural emissions."* (Fonterra, 4738)
- While some submitters suggested treating agriculture (or methane/nitrous oxide) differently, a large number of stakeholders rather felt that we need to focus on reducing emissions from agriculture sector, given that it is responsible for the largest proportion of emissions. Many submitters considered that New Zealand should diversify its economy to become more resilient in the global transition, or improving agricultural practices.
  - *"For too long we have been putting all our eggs in one basket by relying on an unsustainable level of dairying."* (Individual, 4165)
- Some submitters suggested a short term focus on reducing emissions from particular sectors, in particular transport, energy or forestry, while we find solutions to agriculture over the longer term.

- A small proportion suggested our national circumstances mean we should “do less”. A common reason was that action in New Zealand will not make a substantial difference to global emissions, our national circumstance makes it challenging, and/or that climate change is not happening.
  - *“We are already a low user of coal and oil for energy so cannot be expected to do any better.”* (Individual, 4468)

## Costs to the economy

The overwhelming majority of submitters (around 14,800) criticised the costs in the *Discussion Document* as providing misleading information about the true cost of action, not taking into account the “cost of inaction”, the effect of “co-benefits”, or technological innovation:

*“...the world that the Government has asked the modellers to explore bears little resemblance to the one we live in, and that this serves to distort and limit rather than inform and illuminate the debate.”* (Greater Wellington Regional Council, 04730)

Around 1,100 submitters responded to the question about costs, and of these:

- Around a quarter did not agree that reducing emissions is a cost. Many were concerned that framing action on climate change as a cost was misleading. References to the *New Climate Economy Report* were often provided as evidence that countries can act on climate change, while continuing to grow their economies.
  - *“Don’t frame issues in a subjective, negative way. The Discussion Paper portrays reducing GHGs as a cost not as an investment.”* (Individual, 4799)
  - *“Do you want a future for your whānau or just have [your] money now? Requires a cultural shift that moves away from money as the priority to looking after Paptūānuku of the planet for future generations.”* (Te Wakahuia Manawatu Hauora, 4422)
- Around 15% considered that “any cost” is appropriate, or “whatever” cost is needed to halt temperature rise above 2 degrees.
  - *“We need to pay whatever it takes to ensure that our descendants continue to live in a safe environment.”* (Individual, 03695)
- Almost 200 submitters provided a particular level of cost they thought was reasonable.
  - The majority of these (140) provided a response in terms of cost to households. A cost of \$1,800 per year was the most commonly suggested figure (at around 70% of those who suggested a household cost), which is the cost provided in the *Discussion Document* for a 40% emissions reduction target.
  - A further 26 provided a percentage of household income that they would be willing to forego, with the most common response being 2-3%.
- A number of submitters felt that the costs presented in the *Discussion Document*, and the difference between a 5% and 40% target, seemed a reasonable price to pay for a more ambitious target.
  - *“Basically these figures prove that saving the planet actually comes at a very modest cost to the average household and our nation, and is not in any sense a serious impediment to reducing our greenhouse gas emissions, contrary to what so much of this paper is suggesting.”* (Individual, 04775)

- Approximately 7% suggested we should bear no cost, with many not agreeing with the science of climate change or the need to act to reduce emissions.

Overall, a large number of submitters were concerned about who would bear the costs and that it would be equitable, including across generations. Some felt the costs should fall on those who made the most emissions, and not fall on vulnerable households or future generations. Some felt it was inappropriate to include household costs in the *Discussion Document* when costs to the economy should take a “polluter pays” approach.

- *“Responses to climate change must be distributed between different private and public actors according to their carbon (and other greenhouse gas) footprint. While everyone must play a part, the costs will not fall equally on individual households and should not be framed as such. This is only part of the picture.”* (Deconstructing Paris Group Pro-forma Submission)

Some submitters were concerned about the cost to their industry or sector:

- *“When setting New Zealand’s INDC the Government should take into consideration the dairy sector’s contribution to New Zealand’s economy and the potential impacts on dairy farmers and rural communities.”* (DairyNZ, 4734)

## Opportunities

Over 3,300 people wrote about the opportunities of taking action to reduce emissions domestically. The most commonly cited benefits were maximising our renewable energy resources ( such as through electrification of transport) and an improved environment (such as better air quality and warmer homes).

All of the opportunities highlighted in the *Discussion Document* received support by many submitters, and were seen as valuable and important opportunities to pursue.

A key theme is the Government’s responsibility to ensure these opportunities are seized. Submitters expressed concerns that under the status quo, many of these co-benefits would be missed; and a reliance on international purchasing would prevent New Zealanders from benefiting from these changes. For example:

- *“We already have the technology and policies at hand to reduce these emissions – we now need the cross-party political will to put them in place.”* (New Zealand College of Public Health Medicine, 9131)

Many submitters identified a number of additional benefits of transitioning to a low carbon economy in New Zealand. These included:

- an enhanced international reputation
- enhanced biodiversity and erosion control
- improved agricultural practices and the opportunity to develop new technologies
- a more diversified and therefore more stable economy
- healthier and stronger communities.

In addition, a large number of respondents wrote about the opportunities that exist within New Zealand to reduce emissions, and provided suggestions for policies and measures.

A few respondents mentioned opportunities to reduce emissions outside of New Zealand.

- *“Fonterra believe that New Zealand can make significant contribution to global emissions reduction through sharing its knowledge of emissions efficient practices with other dairy producing countries.” (Fonterra, 4738)*

## Dealing with uncertainty

Around 900 submitters responded about how New Zealand should take account of future uncertainties. Of these:

- Around 50% suggested that uncertainty around technology and cost is irrelevant to setting our target. In this context, some submitters suggested that the Government has a role to play in removing uncertainty by setting targets or investing in research and development (R&D). Many submitters emphasized that it is important to take a precautionary approach when addressing uncertainty around climate change. Some submitters suggested there is already low carbon technology available and we need to use that as a basis to set New Zealand’s targets:
  - *“Uncertainties are overstated. Uncertainty in form is not sufficient to justify allowing the issue to stagnate, we cannot wait for a magic bullet. Make the most of currently available technology.” (Deconstructing Paris Pro-forma submission)*
- A quarter of respondents suggested uncertainty around technology and cost meant we should “do more” (ie, table a higher target):
  - *“Take the massive potential for future technologies into account. We should seize the moment and see these targets as growth engines for the economy, not as risks, uncertainties or costs.” (Individual, 1926)*
- 4% of respondents suggested uncertainty around technology and cost meant either we should “do less” or not take a target.
- A further 2% suggested the target should be provisional on various factors such as: future technologies, rules, climate change happening, use of markets, and/or the action of other countries.
- A few submitters suggested that the target should be presented as a range, rather than a single number.
  - *“Any aggregated numeric target should be expressed as a broad range, with clearly stated assumptions. A numeric target should be the outcome of sector policies and activities, not the driver.” (New Zealand Green Building Council, 9186)*

## **Summary of public meetings**

The Ministry for the Environment held 15 public meetings and hui in 11 locations. Approximately 1,700 people attended, and the overwhelming majority spoke passionately and intelligently about the need to take action on climate change.

Many of the issues raised were also common in written submissions, such as the opportunities that New Zealand could seize by reducing emissions, and the urgency with which we need to act.

However, some themes were more common at the meetings than in written submissions. For instance, a large number of people spoke about climate change being a moral cause, and that the need to take action was a moral responsibility.

Similarly, attendees at public meetings were more likely to say that they were willing to pay any cost to solve the problem, and that the Government should not be using international carbon offsets to meet emissions reduction targets.