

## Parents for Climate Aotearoa submission on the Emissions Reduction Plan discussion document of October 2021

17 November 2021

### INTRODUCTION

Kia ora koutou Ministers and wider team. We appreciate the time and hours that have gone into producing this report and we are pleased we finally have the beginnings of a road map moving to where we need to be to ensure our tamariki and mokopuna have a safe climate to live in.

[Parents for Climate Aotearoa](#) is a group of largely parents and wider whānau, concerned with our families and particularly the future of our tamariki and mokopuna in a rapidly warming world. Our parents come from a range of backgrounds and experiences. We are ordinary parents standing up for climate justice, to ensure all children have a safe climate and world to live in.

We are very concerned for those already vulnerable, marginalised and whose voices are ignored in our society. They are most at risk of the consequences of climate change and by poorly thought out mitigation measures. **Our society's role, led by the government is to ensure that no one is left behind.** Our lack of urgency and action today will be felt by our children tomorrow - many people, particularly women and children are hurting today around the world, from the consequences of global warming.

We listened to many of our members tell us about their lived experiences, systemic barriers preventing transition and how important meaningful change is for them and their whānau. We have weaved their stories into our submission below.

Three very clear themes came through:

- **Parents are extremely anxious about their children and grandchildren's future world;** they give a strong mandate to go further and faster. There is a willingness to adapt to different ways of living, working and moving around Aotearoa to the benefit of our young people.

- **The discussion document and engagement is inaccessible** and not for all people - many did not know the contents. Many felt too overwhelmed by life responsibilities to engage with it.
- **We need clear and honest communication from the government** about what the problem is and what we need to do together to move forward. A full public education campaign needs to be funded as soon as possible - especially when the final plan is released.

Our submission is informed from our survey from earlier in the year and our discussions of what is important to New Zealand parents and grandparents.

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## 2040

It's the dawn of the first day of 2040. What a year to be alive! Padding down the well insulated hallway for the first morning brew, there is a loud cacophony of birdsong coming from the tall trees outside. Out the window a large group of keen bean cycling commuters whizz past briefly keeping pace with the light rail train carrying the early bird commuters to work. You briefly feel smug that due to the foresight of good urban planning you only have a 15 minute walk down the road to work.

The sound of the kids moving about reminds you to check that they had remembered to put their bikes away last night. You flashback to when you were growing up in the 20's and the excitement of watching protected cycleways pop up in your neighborhood. It was amazing being able to bike to school with your friends without having to wait for your parents to drive you or pick you up.

Life changed a lot in the 20's and 30's. We used to have a lot of problems and a major one was climate change. It still causes us some problems but not nearly as much as they would have if our Prime Minister and her government had kept the status quo. With the help of everyone and during an awful pandemic, they managed to come up with an epic plan to change the collision course we were on.

They got rid of all the systemic barriers that were holding us back from making much more climate friendly choices. They helped us make our homes as energy efficient as possible running on 100% renewable energy. Our streets were so much safer and much more fun for us kids. We got to learn how to independently travel around without relying on our parents. We walked, biked, bussed, took trams, light rail and the train. It was awesome being able to jump on a bus for free! Our parents were also able to do this so they didn't have to rely on their car anymore, or sit for hours in traffic or worry about how to afford an electric car. I remember when they subsidised e-bikes and my parents were so excited. They got one so they could do a light grocery shop and be able to carry it all on their bike.

The government even changed how our towns and cities were designed so we could go to school, live, work and play within 15 minutes! And trees! Trees are EVERYWHERE. We had access to fresh food grown locally and in really cool climate friendly ways - the government did a great job of making sure our farmers were able to do this. A few people needed to get new jobs and had great training and support to do this too.

We were able to go swimming in rivers, rates of respiratory diseases went down due to reduced air pollution and healthier homes. Māori were given full mana motuhake and our government stepped up to help our Pasifika whānau. We welcomed climate

refugees with open arms and worked globally to ensure a just and equitable transition so all children had a safe climate to grow up in.

People were empowered, supported, educated and everyone got what they needed to thrive in Aotearoa. We all worked really hard together to ensure no-one was left behind and that us kids didn't have to bear the brunt of poor decisions made back in the early 2000's.

Thanks for helping us make that happen.

## OVERVIEW

The next 8 years are crucial for mitigating climate change and limiting its adverse effects. Transport emissions are key in climate change mitigation AND human health. Transport emissions have been driving New Zealand's emissions upward in recent times. At the same time, reducing and ultimately eliminating emissions from transport is one of the more straightforward (low hanging fruit), when compared to other emission sources. **Reducing emissions has a multitude of co-benefits which are still largely missing from the discussion document.**

A rapidly changing climate will only exacerbate the current social issues we have including health inequity. Applying a health lens to climate solutions will have a multitude of co-benefits including addressing current inequities and improving health outcomes. These are also missing from the document. Climate solutions including investing heavily in active and public transport, adapting to less red meat, less processed food and more plant based meals, investing in smarter urban design and more efficient energy in homes will not only reduce emissions but would also improve the health of our people through reductions in heart disease, cancer, type 2 diabetes, traffic accidents, air pollution related disease. **Putting public health at the core of climate response means we would reduce many health and social inequities and emissions reduction** - especially given New Zealand's high statistics in the above mentioned diseases.

The overall ambition of the plan is still far too low, with a disappointing focus on continued economic growth and a reluctance to propose immediate changes (even where these are feasible and economically viable). We have demonstrated with New Zealand's Covid-19 response, that if we tackle serious issues head on and go hard, we can mitigate the risks to our economy as well as wellbeing. Covid-19 also lifted the veil of inequity in this country.

**As a developed country whose emissions continue to rise unabated, it is imperative that NZ makes ambitious and challenging climate goals.** We cannot do this without challenging the status quo, including our consumerist society, our substantial agricultural emissions and heavy industries, such as aluminum smelters that continue to be subsidised.

We have a **moral obligation** more so than less developed countries and future generations to do everything we possibly can do to bring emissions down as fast as possible.

There is an underpinning assumption throughout the document of continued economic growth. Increasing evidence points to the undermining of the Earth's natural capital to the point where we cannot continue to grow. We are killing our very life support systems and need to actively pull back our demands on the planet. Dasgupta's recent report for the UK government on the economics of biodiversity implores us to value our natural capital and move away from activities that damage the natural world (Steinberger et al challenge the myth of green growth and decoupling emissions from growth [here](#)).

While leveraging co-benefits was a principle used to underpin the document, **there was insufficient focus on the costs of not reducing emissions**, which many studies around the world are showing greatly outweigh the cost of even the most expensive actions.

We also question whether the discussion document is in keeping with the purpose of the the Climate Response Amendment Act which is to:

provide a framework by which New Zealand can develop and implement clear and stable climate change policies that—

**(i) contribute to the global effort under the Paris Agreement to limit the global average temperature increase to 1.5° Celsius above pre-industrial levels; and**

**(ii) allow New Zealand to prepare for, and adapt to, the effects of climate change:**

Covid-19 showed us the importance of an evidence-based scientific response to a national and global pandemic. It also showed us the importance of values and how they too underpinned our response. Immediate and decisive action made a major difference to the impact of Covid-19 to New Zealand compared to much of the world. **We placed the health and wellbeing of people above the economy.**

Therefore we firmly believe we need to hold the long term view with rapid action. Government departments should be and need to be implementing serious policy now instead of endless consultations and incremental slow change.

At the moment it is up to largely volunteer community groups such as ours, youth and many others to constantly check that our councils and government are doing all they can to reduce emissions. Most projects are still not taking emissions or adaptation into account and it is not possible for our communities to cover all government activities at all levels. We are exhausted and the wall of work is soul destroying at times. We do this for our kids, yet we are not present enough for them now because of this unpaid work. We need clear leadership, like demonstrated through the pandemic to do the right thing, which we can support.

**Climate anxiety is a very real, and growing intergenerational mental health issue** that many of our members can attest to including many working on this submission. We would like to see increased funding in this area including research and accessibility to funding for counselling for our young people and their parents in particular.

**We must see local and central government partnership and leadership on climate change mitigation and adaptation prioritised.**

There is still an implicit expectation that many can make lots of money off climate change, especially through offsetting, hence continuing to create winners and losers. We need a Covid-19 like focus of minimising the harm and helping as many as possible to get through.

*“I like that there is a plan, and the framework and thinking underpinning it is a great step in the right direction. However, it doesn't go far enough in many areas beyond making adjustments to BAU when we really need bold step changes to limit global warming to 1.5 degrees. In particular the lack of vision and commitment to funding more active travel infrastructure and cheaper public transport as well as an unambitious approach to agriculture is a let-down.”*

*Julia mother of 2*

*“I like that there is a plan, it feels like it has been a long time coming and that we used to talk of 2030 and then 2040 and now its 2050.... so the goal posts keep moving yet the goal doesn't vary much.”*

*Lucy mother of 3*

*“As a parent, I still see a future in Aotearoa for my children but not to have grandchildren - many young people are not having children through fear of climate change and the impact extra lives has - this is very sad as why protect and regenerate if there is no one to enjoy it - the earth will survive without people so it would be nice to think that there were future generations that will continue to enjoy it.”*



## **PUBLIC EDUCATION AND CLIMATE COMMUNICATIONS**

We recommend a significant focus on **Article 12 of the Paris Agreement** of public awareness and education for all people. We need an education campaign similar to Covid-19 (particularly the 2020 campaign) and as persistent as reducing smoking or road safety. This education focus is key for people to:

- Understand the problem and the scale
- Be clear on what we do and don't know
- Understand why we need rapid and drastic change in all our industries and life
- To rally around a set of shared values for collective action
- To enable and empower communities, tangata whenua and businesses to take action themselves
- To support the mental health of all our people, as by being truthful and proactive we can minimise hopelessness and maximise collaboration and community

**Education and engagement must be throughout our society, with true partnership at all levels.** We have done this with Covid-19 and we have seen the results in other countries that lacked leadership, consistent messaging and being upfront about what they did and didn't know. This left a vacuum, which was filled with misinformation and self interest, with catastrophic consequences. People did not know who to trust. For the last three decades this is what has happened with climate change, there has been a vacuum left by governments, filled by self interest and misinformation. We cannot wait for another decade or we will have devastating consequences.

**This education campaign needs the following:**

- Multi level and targeted across all platforms based on shared values and vision.
- **Cross-agency with interconnections weaved together.**
- Upfront about the uncertainties and what we do and don't know.
- **Upfront** that change will be hard at times, harder on some than others with a big focus on the win-wins - we need to focus on co-benefits and how our lives can and will be better. For example, a strong focus on active transport outcomes and improved urban design will be transformational on urban families, and on health.
- **Regular briefings** of relevant Ministers and the Prime Minister.
- **Education campaigns based on storytelling and vision setting.** For example, a cross section of prominent Zealanders stepping up to talk about climate change and their worries, experiences and vision for their children's world.
- **Media taking a responsible role**, and being held accountable. Not the current format of pitting groups against each other which exacerbates the problem and delays resolution.

- In partnership with and community led. **Budget for community outreach and paid roles for people within these communities to do the mahi.**
- Education on what it will cost socially and economically if we don't act.
- **Be culturally responsive and appropriate** - in particular fund and resource Pasifika and iwi.

A good example of an education campaign is one with more of a community solution focus than individual. For example we would like to see organisations like GenLess take a more nuanced approach to gender, class, ethnicity and disability etc. **More thorough representation of both society and people is needed.**

## TE TIRITI AND JUST TRANSITION

We asked our members earlier in the year “What does an equitable, inclusive and well-planned climate transition look like for you?” and received very clear messaging that it started with **centering Te Tiriti o Waitangi, a true Māori led partnership with all the principles honoured**. They also felt very strongly about no one being left behind and that inequity is drastically reduced, not increased by ensuring **“Children, disabled people, low income, Māori and marginalised people are centred.”**

### Just Transitions Strategy

The Climate Change Commission recommends developing an Equitable Transitions Strategy that addresses the following objectives: partnership with iwi/Māori, proactive transition planning, strengthening the responsiveness of the education system, supporting workers in transition, and minimising unequal impacts in all new policies.

**We would like to see Just Transition terminology used as it best describes what is needed.** We would also like to see support for communities in transition i.e. not just the workers directly affected, but their families and the community that surrounds them.

Because communities as a whole are impacted when local industry needs to transition to climate friendly work opportunities, we suggest full wrap around support and that these **community leaders are empowered to engage with what is best for workers, their families, their communities and towns on what is the best way forward for them.**

We would like to see:

- **Clear communication** of climate science and the changes required in a way that lay people can understand.
- **Information** on what low emissions business and job opportunities are relevant to their community.
- **Learning from other communities** who are further along the transition pathway.
- **Funding** for the mahi required. At present most climate work in communities is unfunded.
- **Working with, funding and resourcing our Pasifika whānau** - government must go further and faster in this space.
- **Going further than honouring te Tiriti** - we want to see the government embody these principles and ensure Māori have tino rangatiratanga.

Systemic changes are needed in order to facilitate emissions reductions in the home, particularly for low income families. Asking what could help reduce individual household

footprints is a very one size fits all, household level way of looking at emissions. **The bulk of Government work needs to be on changing the system that currently locks in high emission lifestyles.**

However, in a climate emergency, we must leave no stone unturned. Here are some useful ways that Government can support households to reduce their carbon footprint:

- **Undertake a comprehensive public communications campaign** like it did for Covid-19, particularly in 2020. Educating people on the seriousness of the crisis, what the science is telling us and what changes need to be made.
- Ensure ALL policy, education and communication is made with **real engagement with disabled and low income people and is culturally appropriate.**
- **Ban advertising of climate unfriendly products and services** such as SUV's, double cab utes, flying, single use plastics etc. Advertising creates demand that would not otherwise exist, so preventing this will help reduce demand.
- **Provide free public transport to community service card holders, tertiary students and under 25's**, and low cost public transport in cities and towns and inter-regionally to support reduction in vehicle use.
- Promote plant based diets, low processed and reduction in meat and dairy consumption (**and health benefits associated with this**).
- Subsidise insulation upgrades and installation of energy efficient lighting and appliances in rental homes and public housing to reduce the impact of energy bills on low income households. **Again this comes with a multitude of health and economic benefits.**
- **Subsidise electric and push bikes** to encourage mode shift and active transport.
- Support the installation of **completed protected cycle networks** so that people and families feel safe to cycle.

Regarding low-emissions business models and production methods - this is certainly something that relates to the six strategic areas for co-design with iwi/Māori listed on page 6 of the discussion document. Also there is the question of whether direct grants like the Government Investment in Decarbonising Industry Scheme are a better approach than relying on the ETS.

**What our members have shared with us on te Tiriti and Just Transition.**

*“Just as the developed world has a responsibility to support the developing world to compensate for its pollution and to enable development, so too does New Zealand need to support its less developed areas. Funding and significant support will need to be*

*given to deprived areas to ensure warm and secure housing, low emissions transport, meaningful work, access to healthcare and improved public amenities etc.*

*“Not enough lived experience making decisions and forming policy e.g. from a disability perspective. Inequity in engagement processes. The wrong people are at the table and this must change in order for an equitable, inclusive and JUST transition to happen.”*

*“Among other measures, I think it must include a wealth tax. On this issue, the Team of 5 Million won't be able to hold it together at the present levels of wealth and income inequality. We'll need good retraining systems for people whose industries dwindle in a low carbon economy.”*

*“One centred around our te Tiriti o Waitangi obligations, one that pulls people up rather than leaving them behind.”*

*“Free public transport for essential workers. E-bike subsidies and share bike schemes everywhere. A wide recognition that we're done with business as usual, because we have better ideas than that. An approach that takes the weight off those who can least afford it - the housing-poor, the young and very old. A communications approach like our Covid-19 response that will be emulated by the world and taught for centuries to come.*

*Includes cheaper, non fossil-fueled public transport that goes to more places, more often, with better mobility access so that those with mobility challenges (prams, crutches, wheel chairs, large haul of groceries etc) can use it more easily.”*

*“The goal of decarbonisation should be something all New Zealanders are part of and share, as we all lose if this is not a priority. It looks like taking into account all sectors of the community, not just the loudest and the richest, and drawing on (and centering) Te Ao Māori and indigenous knowledge. Not everyone is going to agree about how we do this, but there needs to be a collaborative and constructive spirit as this transition is in everyone's interests.”*

**This longer quote is our absolute favourite!**

*“Busy. It's going to be very busy, with huge communication efforts to ensure people understand what changes are being made and why. Think Covid-19 communication efforts but on steroids, and lasting decades rather than months. Communication needs to be 2 way, to ensure the concerns of diverse groups are heard and addressed.*

*An unprecedented level of responsible treaty partnership, with meaningful changes in power and resourcing that ensures the response to climate change doesn't constitute further colonisation of indigenous peoples, nor another example of further structural*

violence towards BIPOC (Black, Indigenous, People of Colour). Extensive consultation with other marginalised groups including disabled people and the LGBT community to avoid structural violence. It will be a time to turn tino rangatiratanga/sovereignty into reality.

**It will involve courageous leadership by politicians (and others) with a long term vision beyond getting back into government at the next election.** It will mean being brave enough to take steps which seem radical and constitute a marked departure from the status quo. Anything less will be inadequate. It will involve unprecedented coordination between different stakeholders and sectors, as well as different government departments. We're not very good at that, so we're going to have to get much better, very quickly.

It will involve huge chunks of society getting new skills and new jobs, across the entire socioeconomic scale. The changes in power and messaging and policy will have expression in visible physical changes. It will involve rehabilitation of a range of ecosystems - grasslands, forests, wetlands. People will notice new things in their physical surroundings - in shops, on the streets, in their neighbourhoods - and the explanation will be "emissions reductions".

International coordination will also be important. We will support Indigenous efforts in other parts of the world to preserve their sovereignty, culture, language, lifestyle, land and ecosystems, both because it is the right thing to do, but also because if we succeed in reversing ecosystem collapse, our efforts will pivot on the work of Indigenous peoples and their worldviews and values. We need a shift in culture and values, we need to reject the values which have led us to destroy the planet, and we will need alternative views to replace those values. Indigenous values are more consistent with sustainability."

## TRANSPORT

We are a member of the [Aotearoa Collective for Public Transport Equity](#) and fully support this [submission](#) focusing on free fares. **It will help families be less car reliant, foster growing independence in our children and young people and make public transport a climate friendly, easy and affordable choice.** Right now it is simply too expensive. An immediate implementation of free fares for community card holders, tertiary students, total mobility card holders, and under 25's would be a strong start to transport emissions reductions.

### Vehicle Kilometres Travelled (VKT)

We support a stronger VKT reduction target. We propose a VKT reduction target of at least 20 per cent by 2030, and at least 30 per cent by 2035. The Ministry of Transport's own analysis underlying its VKT reduction target supports such a target. It includes this statement: "We note that the raw research data indicates that a 'high' VKT reduction assumption would yield a 22.5% drop in VKT as a result of combined pricing, land use and public transport interventions by the 10th year", and also notes that the combined effects of land use, public transport and pricing interventions have been modelled conservatively in the analysis. **We can and must adopt the highest-end target that is achievable.** We support the [Living Streets Aotearoa](#) analysis in this area.

It is important to implement ambitious targets ensuring these have a clear organisational home with funding and accountabilities that enable action towards achieving this goal.

To meet the scale of the climate emergency, and to play our part in giving the world a chance to remain within 1.5 degrees and stave off the worst effects of climate change, we need sharp emissions reductions by 2030. **They can be achieved faster, at lower cost and with far greater co-benefits by investing in walking, cycling and public transport, and removing all barriers that currently prevent these investments at the scale needed.**

Reduction in traffic has massive health co -benefits from reduced respiratory impacts to accident reduction; active transport would improve health; roadside tree planting supports biodiversity and reduces sediment loads in waterways. People walking and cycling need and appreciate shade. Trees also reduce the urban heat island effect, they help reduce pollution, sequester carbon, reduce flooding and increase overall wellbeing. **Reducing car dependence and increasing transport choice is a public health issue.**

New Zealand's internal and domestic emissions reduction commitments and the IPCC recommendations all demonstrate the critical importance of maximising emissions

reductions between now and 2030. Providing better transport choice by improving walking, cycling and public transport - including measures to reduce the cost of public transport for people and families who can least afford to use it - as well as measures to reduce transport demand - not only cost far less than investments in new transport infrastructure but can be implemented much more quickly, including by the use of tactical urbanism. **Therefore, we think there should be a strong emphasis on implementing such measures during the first two budget periods, and then building on that during the third budget period.**

We support the development of separate walking and cycling strategies. Each strategy must be co-designed from the start with affected groups, including disabled persons' representatives, and must draw on the latest evidence about walking from Aotearoa and abroad. **Children's experience of walking and cycling is not the same as that of adults, and parents' and childrens' perspectives should form a key part of the development of these strategies.**

While we agree that our largest cities are where the most potential exists for reducing VKT by cars and light vehicles, the six largest cities are far from the only cities with public transport. **Provision for walking, cycling and public transport also need to be improved in provincial cities and towns, including the use of shuttle-type services to allow increased provision of services:** in provincial cities such as New Plymouth, the long gaps between buses is one of the major deterrents to more people using public transport. We've written more on this further down.

A disability centered approach to transport and urban design needs to be made a top priority at local and central government level. **By designing our cities and transport systems for children, for parents, and for disabled people, we can ensure that our transport systems work for everyone, not just able-bodied commuters.**

While there are still a few loud voices opposing any change, there is a growing number of residents throughout NZ that are supporting their councils to make significant changes. This is resulting in plans such as the newly released Tasman District Council [Walking and Cycling Strategy 2022-2052](#). The values and purpose of the Transport Policy Statement has helped change the focus and goals for local consultations. **This coupled with growing public awareness of the health, climate and equity issues,** some councils are trying to do what is needed to enable modeshift and increase wellbeing. The government should help accelerate these plans, by providing more funding to implement them in the first two budgets.

**What % of light vehicle fleet should be zero emissions by 2035**



Cars, vans and light trucks will be needed in 2035, and as many as possible should be zero-emissions vehicles. But **a key weakness of both the Climate Change Commission's proposals and the Government's response** is that there's too much focus on swapping one type of car for another, not on changing the transport system and backing options with low-embedded and operational emissions.

Therefore, we support measures to provide subsidies and incentives for the uptake of e-bikes, not just electric cars. **We also support community-based and Māori-led schemes to make low-emission vehicles (including e-bikes) more accessible** – for example, social leasing, shared mobility schemes run by community/iwi/hapū, rent-to-buy or gradual payments, car and bike sharing.

With regards to tax, we urge the Government to remove tax incentives that encourage transport emissions and use tax and pricing tools to encourage public and active transport modes. In particular, the current Fringe Benefit Tax (FBT) regime creates perverse incentives. An employee subsidy for annual public transport use or purchase of an electric bicycle is subject to FBT, but the provision of a carpark to staff is not. This undercuts the Government Policy Statement transport targets of increasing use of low carbon modes such as walking, cycling and using public transport. These perverse incentives should be removed. Changes to the ETS, Road User Charges, and congestion charges are other tools available - **provided revenue is directly or indirectly recycled to ensure that transport and access needs are met in a just, equitable way.** [this proposal from Living Streets Aotearoa]

We do not believe that a large-scale reduction of individual vehicles to electric cars can deliver emissions reduction consistent with our climate goals. To achieve climate stabilisation on a global scale, developed countries such as New Zealand need to explore solutions within the degrowth paradigm and commit to fast and radical action. **In the transport space, mode shift is important, but should be combined with a drastic reduction in total transportation demand.**

### **Freight transport emissions reduction**

We consider the proposed target of 25% reduction far too unambitious. Both climate science and NZ's international commitments show that it's crucial that we achieve the maximum possible level of emissions reductions by 2030, in the first two budget periods. **We would like to see a target of at minimum 35% reductions by 2030, and 50% by 2035.**

Achieving this is going to take a mixture of measures, including a reduction in the amount of freight transported, **mode shift, the use of cargo bikes for last-mile**

**deliveries, and moving as much freight as possible onto electrified rail (some coastal shipping for trainless regions).**

Discussions of decarbonising the heavy transport fleet tend to fall into the green hydrogen vs biofuels vs electrification camps. Which choices and investments are made will have major implications for the communities most affected by each choice.

Therefore, **we support the development of a national strategy for heavy freight decarbonisation, but with a core focus on co-design with affected communities, and a just transition.** Merely developing the proposed low-emissions Freight and Supply Chain Strategy with industry, as proposed in the draft ERP, will not lead to a just or equitable transition.

We also need to look at whether our current level of heavy goods movement around Aotearoa is necessary, in the context of a wider discussion about whether the current focus on economic growth is compatible with our emissions reduction obligations and in particular the need to decarbonise the transport system.

### **Ban on internal combustion engine (ICE) vehicles entering (etc) Aotearoa by 2030**

We support this ban being put in place by 2030. To make it work for communities throughout Aotearoa, a range of measures will need to be put in place to ensure a just transition and ensure that transport choice is enhanced and transport poverty is reduced. **It will be particularly important to focus on the needs of iwi, hapū and remote communities, and to reorient towards a shared vehicle ownership or access model wherever possible.**

Alongside these measures, we need an immediate moratorium on the construction of new fossil fuel service stations, and the **development of a national charging network for electric vehicles that extends well beyond State Highway One.**

An example of an immediate action we could take to move towards this goal is banning advertising of internal combustion engine vehicles.

### **Additional views and experiences from our members**

We want the Government to take an integrated emissions reduction approach to the entire transport network. Many of the proposals in the draft plan are excellent, but they have to work together, not get stuck in silos.

If we are going to quickly increase EVs then that will drive an increase in use of electricity. **We need to ensure that power companies we will be increasingly relying on to keep fair prices. We will need to increase renewable energy generation to**

**keep pace with this.** This is a crossover issue with “Energy and Industry” - it is all interconnected.

### **View from Wellington/Hutt Valley:**

**Cycleways:** Last year a cyclist was killed by a heavy vehicle on SH2 between Hutt Valley and Wellington. After that I started noticing the bicycle lane the cyclist was using: in a lot of places it is merely a regular motorway median with a green line painted on it. The situation on SH1 is similarly dire. It is so dangerous! We need real cycleways to support people cycling to work and to get around their neighbourhoods.

**Public Transport:** The last few years has seen the bus service in and around Wellington become worse. The big bus route redesign in 2018 concentrated on commuter routes, de-prioritising routes more likely to be used by parents, children, and rangatahi to get around their neighbourhoods or to access the city. I was so mad when I realised it was going to take two buses to get near the zoo and then have to walk the last bit, when we used to have bus service right to the zoo’s front gates.

We have also seen an increasingly overworked and underpaid bus workforce having to continually advocate for better working conditions. This is bad for the drivers and also bad for the quality of service for bus riders. There have been a lot of cancelled buses; the whole system is becoming unreliable. And we have gone from having an overpriced airport bus service that doesn’t accept any form of concession card, to having no bus service to the airport at all. I think this is the predictable outcome of privatisation. The most highly used bus routes and times are prioritised, instead of prioritising public transit access for everyone.

Private companies will prioritise profit over the good of the public or the rights of its workers. We need to return public transport to public ownership in Wellington City and Wellington Region.

**Continuity:** I’d love to see an integrated system between our diverse public transit systems in the area: rail, bus, ferry, and cable car. Monthly passes that include all systems, Snapper card accepted on all systems, coherent fares and concessions across all systems. This would make it simpler to navigate and increase usage.

### **View from Ngāmotu:**

**Cycleways:** We are lucky in New Plymouth to have the coastal walkway, which runs across the front of the city. This amazing piece of active transport infrastructure is well known, well liked, and well used. However, housing with direct or easy access to the facility is expensive, and without safe and separated cycling connections to shopping

centres, schools, workplaces etc. its use in cycling for transport is limited. The walkway has driven strong sales of e-bikes in the city, but the use is still mostly recreational.

This is just one example of where cycling infrastructure falls short in New Plymouth and so many New Zealand cities. Without safe and separated cycle infrastructure that connects people to the facilities they use in their daily life, cycling is fun for recreation, but is not a viable alternative to driving for many people. This is especially true for people travelling with tamariki, who do not yet have the skills required for defensive cycling on city streets (many adults don't feel confident cycling on NZ roads; how can we expect it of our children?)

Public transport: The timing and frequency of buses in New Plymouth makes it difficult for even committed citizens to use public transport. I live a ten minute walk from a bus stop, and a bus goes from this stop to the city 1-2 times per hour on weekdays, with even more limited services on weekends. Many popular locations (e.g. airport, supermarkets, beaches, parks) are not connected by public transport at all. The cost is also a barrier, with a 7 minute bus trip costing our family of three \$7 one way, or \$14 return. With car parking usually fairly easy to find and costing \$2 per hour, taking the bus is slower, less convenient, and more expensive than driving. It's not hard to see why the service is not widely used.

One challenge locally is the division of responsibility. Public transport is run by the regional council, but active transport plans, roads, parking, recreation plans, and events are operated by the district council. This leads to a disconnect where the authority responsible for most of the things that would be improved by improved public transport does not actually have the ability to change the public transport provision. ([reference article here](#))

One positive, though, is the use of the Bee card, which is also used in several other regions and cities around Aotearoa. On a recent trip to Ōtepoti/Dunedin, our family used our cards to catch a bus (on a service that was significantly cheaper and far more frequent/useful than our local service). We would most likely not have used public transport without having the cards already, and this is just one example of how removing barriers to public transport can increase its use and reduce vehicle kilometres travelled.

We hope that smaller cities and towns won't be forgotten in the creation of cycling, walking, and public transport plans. The challenges may be different in small cities vs. larger centres, and this will affect the balance between public and active transport initiatives in different areas. But we must remember that active transport does not work

for everyone, and that provision of public transport in as many areas as possible supports the independence and inclusion of disabled people, elderly people, and young people. In order to support the goal of VKT reduction, smaller centres need support, investment, and an alignment of interests to ensure they can do their part.

### **View from Wairarapa**

Travel with kids: There is currently no choice but to drive in Wairarapa. The bus service is not suitable for families - there is only one service every 1.5 hours and it takes longer than driving. Keeping kids safe and still on a bus is really difficult too - there's no comparison between a bus and train.

I would love to be able to use the train during the day but the lack of service makes it completely impractical. There is only one non-commuter service we could use - the 10.21am train from Featherston to Masterton (we can't use the afternoon one as there would be no way to return), but we couldn't return until 3.38pm and if we missed that service we would be stranded.

This is really frustrating as I would much prefer to take the kids on the train. It's safer and takes the same time as driving, as well as being more fun - we could read and chat and play games instead of all my attention being on the road. It would allow us to take our bikes easily and use the growing cycle lane infrastructure in Masterton rather than drive from place to place once there. It costs me \$15 in petrol to drive to and from Masterton whereas a return trip on the train for me and one child over 5 would cost \$10, so it's cheaper too.

What I would love is a fully electric service between Featherston and Masterton, that runs at least every half an hour as do all the other electric daytime services in the region. If I knew I could catch the train every half an hour, and if the cost of travel was even further reduced (by making all people under 18 free, for instance) I might only need to use my car once a week, instead of every time I want to leave Featherston.

I understand there are difficulties in extending the electric service further to connect Wairarapa and Wellington but I believe this is essential for the long term. A major problem in travel between Wairarapa and Wellington is the number of trucks (especially logging trucks) coming through the towns and travelling over the hill. It's unsafe and downright scary driving over the hill when a logging truck passes by. I believe ALL cargo transport through Wairarapa (and over the country) should be done by rail - but this won't be possible until it is all electrified and is made into a double line track, to allow cargo and passenger services simultaneously. This would make our main streets safer and healthier and all the towns much better places to live.

EV's: There are still going to be places that can't be reached by train and need to be driven too, so EV subsidies are really important out here too. We would love to be able to get an EV but just can't afford it right now. There are charging stations in every town so it's only the cost that's holding us back.

### **View from Tasman & Nelson**

In Tasman we have many rural schools which have school buses. The current rules and decision making process is a barrier to more kids taking the bus. An example of this is Appleby Primary School, where the access to the school are busy roads with speed limits of 80 and 100km. There is no safe walking or biking access to the school. There are numerous barriers to taking the bus, a minimum 2km distance from the school, up to a maximum walk to a bus stop from the kids home and time spent on the bus.

One parent says “their kids can spend 50 minutes on the bus on the way home, whereas in the morning it takes only a few minutes”. “Most families drive their kids to school, but many would like to see their kids take the bus”. There seems to be an inflexibility in changing bus routes and stops as kids come and go and “it is unsafe for young kids to cross busy roads with 80km+ speed limits and long walks home”. The solution is to put the decision making on routes, stops and access with the schools, who know their communities best and can change as needed.

One of the major barriers to changing infrastructure and road environment in urban areas, is funds for councils to implement them. Many council consultations have long timeframes because of costs. There are many low cost measures that could be done quickly, such as traffic calming and low speed residential streets with temporary structures that would have immediate results in both livability and promoting active transport. Many communities are keen to help these implement projects, which could further reduce costs.

### **View from Kāpiti Coast**

I agree with all of the above. We recently moved up from Pōneke Wellington where we were already struggling to cycle or use public transport because of safety, regularity, reliability and cost. The public transport system is geared towards commuter travel and even then makes it challenging to take bikes on the train especially from the wider region communities. We currently live on State Highway 1 between two train stations and have a very long convoluted bike ride to the nearest town and school rather than a safe direct route along the highway.

I live at the bottom of Transmission Gully and when I look out during peak times and see the slow crawling traffic, I often wish we could prioritise infrastructure for walking, cycling and public transport. Hundreds of thousands, if not more, New Zealanders would like active modes to be the easy choice and see a cultural shift in how we move around to more climate friendly practices. This would free up the roads for those who truly want to or need to use road vehicles to move around.

Working with school communities to implement low traffic neighborhoods, walking school buses, prioritising protected cycleways on school routes, free public transport would also have the co-benefit of improved health outcomes for our children and young people.

**With improved urban design, well thought out prioritised active transport infrastructure, there is no reason why we can't crack on with these solutions as soon as possible.**

## WASTE

### Circular Economy

What our circular economy could look like in ten to thirty years really depends on the courage and imagination of our government and the steps we take towards it. Creating a strong vision is important, and worth investing in. Internationally, there are visions already created that we could use to develop an inspiring vision that works for Aotearoa:

- see [Zero Waste Europe](#)

When developing a vision, we think it's important to focus on what we can GAIN from a circular economy. Many people will see changes in this space as a sacrifice or a loss of what we have now, but **a circular economy can offer us so much, like increasing ties with the community, reducing mental load in terms of decision making, and reducing household costs.**

On one end of the scale, we could be looking at a greenwashed version of the current reality, with a lot of compostable and “sustainable” (but still ultimately disposable) packaging and waste that feeds a bioeconomy, which allows us to think that our waste is not so bad. Our economic drivers could be adjusted, but not transformed, rewarding “green growth” and recycling rather than true waste reduction and circularity.

At the other end of the spectrum of possible outcomes, we could have an economic system that has confronted consumption and consumerism as the elephant in the room and recognises that we cannot continue pumping more and more into the top of the waste hierarchy and finding ways to deal with it. We could have strong public educational campaigns that acknowledge a need to scale back at every level to achieve our goals. **This public education campaign would be supported by a shift away from GDP to new measures of success, and government policies that empower communities and households to reduce waste and regenerate natural systems.**

The question of what things could look like in 2050 is particularly difficult, because there are so many ways things could go in the next thirty years, and the direction is highly dependent on the government's action or inaction now.

We think that a strong circular economy would require:

- **commitment to producing and consuming less**, as well as improving how we deal with waste
- **regulations and/or support at many levels** (e.g. manufacturers, retailers, consumers, waste companies)



- **clear accountability and financing** to enable and encourage action towards the goals

We also need to measure the circular economy and change our economic levers to measures that recognise and reward circularity, rather than focusing heavily on GDP, which encourages an extractive economy.

### **Bioeconomy**

We believe that our emissions reduction plan should coordinate strongly with existing plans and strategies, particularly the Climate Change commission recommendations, to avoid double work and endless consultation without action. Therefore, we would be happy to use their definition of the bioeconomy:

“The ‘bioeconomy’ refers broadly to the parts of the economy that use renewable biological resources (biomass) to produce food, products and energy. When it incorporates circular economy principles, a bioeconomy can use biomass residues or waste from forestry, fisheries, agriculture and households as raw materials to produce other products.”

**We think it is particularly important that our bioeconomy agenda is strongly tied with our circular economy principles**, and doesn’t encourage increased activity/emissions in order to supply the bioeconomy.

The bioeconomy may be useful as a transition tool and form a part of the final circular economy, but **in the long term we see a strong circular economy with reduced production/consumption and transformative economic levers to be a more powerful approach to reducing waste** (and thus the emissions from waste).

### **Circular economy strategy**

A robust circular economy strategy in Aotearoa would connect strongly to existing government strategies and plans (i.e. the wellbeing budgets) and would be tied into our measures of success at a high level. This would mean the strategy would align with the government’s other goals, and would get top-down support.

We believe an effective strategy would also include a strong communication plan, to ensure bottom-up action and as many people as possible on board with the goals of the circular economy. To achieve this, we believe the strategy needs to be engaging and accessible. **Rather than multiple strategies across different areas/sectors, we would like to see a cross functional, wide reaching strategy that allows for cohesive messaging and more effective consultation.**

## **Bioeconomy inclusion within a circular economy strategy?**

Yes we agree with this. However, we need to be aware of the limitations of the bioeconomy in driving a circular economy. **The bioeconomy is better than the status quo, but is still ultimately an extractive/consumptive economy.** As well as creating circularity, we need to ensure economic levers encourage putting less into circulation.

## **Potential proposals**

We support the working principles of a circular economy listed in the discussion document, particularly:

- **designing out waste**, pollution and emissions, and unnecessary use of materials
- **taking a whole-of-life approach** to materials and products, and eliminate waste and pollution through design and planning
- **thinking in systems**, where everything is interconnected

However, it is hard to see from the document what the plan is to achieve these ideas. As a comprehensive strategy could take some time to develop/consult on etc., **we believe that we need to start to act in this direction before drawing up a comprehensive strategy.**

There are many community groups around Aotearoa working in this space ([Zero Waste Network](#), local zero waste groups (e.g. [The Junction in New Plymouth](#), [Xtreme Zero Waste](#) in Raglan)). **One option for quick action would be to tap into that network and fund these groups to develop local action plans that align with the working principles discussed.** This funding could also be delivered through local councils, many of which are already working with local groups to pursue steps towards a circular economy.

We agree with the call from Zero Waste Network in their submission on this plan for “an agency dedicated to the circular economy, resource efficiency and conservation, to reduce silos, build a shared understanding, and enhance coordination.”

## **Barriers**

We see the main barriers to a move towards a circular approach

- A strong cultural norm of consumption and capitalism.
- Entrenched individual and business behavioural habits.
- A lack of incentive/desire to change away from the status quo.
- A perception, particularly in business, that the cost of change will not be worth the climate payoff.

- A lack of comprehensive and urgent action in that direction from the government.

Transitioning to a circular economy also requires a high level of coordination across government and other agencies. Our current government approaches tend to be siloed (as demonstrated in this discussion document), and **political courage is required to find ways of working across these silos to transform our economy.**

### **Cross sector regulations and investment**

We believe that the priority should be for investment in small, local solutions that deliver funding through trusted community leaders and enable quick action.

### **Our view**

We believe this space needs much more ambitious and quick action than it has received so far. The emissions reduction plan discussion document heavily focuses on developing strategies, but this risks delays in action and implementation, which are important and urgent now.

### **Target to reduce waste biogenic methane emissions by 40 per cent by 2035**

We support the target to reduce waste biogenic methane emissions from waste by 40% by 2035. We would like to see the major focus of the plan to be on reducing waste, with diversion of waste streams and capturing emissions supporting this but not taking away from the overall goal.

The waste hierarchy diagram that is included in the ERP discussion document (p. 102) is a key piece of information and a guide to strategy in the area of waste. We believe the major focus should be on the top three areas of the hierarchy: Rethink/Redesign, Reduce, Reuse/Repurpose.

### **Funding for education and behaviour change**

We believe behaviour change is essential in the waste space, and would support funding education and initiatives, particularly those aimed at reducing waste. We encourage all educational initiatives, particularly at the household level, to drive towards a just transition (e.g. by focusing on low- and no-cost solutions, and by including diverse voices and strategies).

We support the Zero Waste Network call for “incentives and investment for new business models, such as regenerative urban horticulture, that localise food supply chains”. Growing the urban farming sector, coupled with localised composting, also has potential to offset a range of inefficiencies in the food system while providing a wide range of benefits to local communities.

While the waste hierarchy was included in the plan, the actions included seem to focus lower in the waste hierarchy. **We believe that our action in the space of waste should focus high on the waste hierarchy (Rethink/Redesign/Reduce) and also high in the supply chain (at the manufacturer and retailer level, rather than focusing on individual household behaviour.)**

Behaviour change education should also focus on reducing barriers to change and making the changes we're asking for as easy as possible. This will help to minimise resistance and drive action. **Communication should avoid confrontational approaches and moralising;** as we have seen with Covid-19, particularly in the latter phases of the pandemic, people react strongly against being "told what to do".

### **Support policies**

The best way to reduce disposal costs is to implement zero waste and circular economy strategies across society to drastically reduce the need to dispose of waste in the first place.

Rather than focusing on individual behaviour, **we would like to see these impacts managed with systemic responses that use regulation and economic levers** to drive responsibility for this issue back to retailers and manufacturers. These could include:

- policies that guarantee a right to repair,
- a right to return packaging to manufacturers/retailers to discourage overpackaging,
- a ban on discounting that encourages food waste (e.g. multibuys)
- Food rescue programmes
- packaging requirements for manufacturers at all steps of production requiring recyclable or reusable packaging

There will also be a need to prioritise local-scale actions and strategies that grow community resilience and connectedness, provide local employment and economic opportunities, and keep resources and finances flowing internally rather than being extracted by multinational companies.

### **Disposal of food, green and paper waste at landfills ban**

Yes, we would support a ban on these wastes at landfill within this timeframe. We believe this ban should apply also to organisations and institutions (schools, hospitals, government agencies etc.)

However, we can identify many gaps in our current infrastructure that would make this challenging currently, and would need to be worked out in the short term to achieve this goal. Some of the barriers that would need to be worked through include:

- Business behaviour change
- How we deal with public rubbish bins and the individual behaviour around them.
- The responsibility of sorting “tainted” bins (e.g. where bins collected include banned items)
- Making it easier for people to change behaviour with consistency of collections in different areas/businesses.

When it comes to recycling this waste, we prefer composting (vs. other disposal methods, and **would like to see small, local solutions (where appropriate) to support local circular economies and empower communities** vs larger/black box solutions that hide waste from communities.

We would also like to see this strategy include a ban on edible food wastage from businesses (similar to the law France introduced in 2016). This could include support of existing or new local charities that work to divert edible food waste to people who need food, which benefits local communities and families as well as reducing emissions from food waste.

### **A ban all organic materials going to landfills that are unsuitable for capturing methane gas**

We support this move. Additionally, the discussion document acknowledges the risk that “relatively cheap disposal for Class 2–5 landfills undermines reduction and resource recovery alternatives” (p. 103).

We support the suggestions from the Zero Waste Network submission for managing this risk:

- a meaningful increase to the waste disposal levy for Class 2-5 landfills
- Designing exclusions for organic waste disposal into the licensing regime for operators Class 2-5 landfills, as well as requirements to separate and send materials for reuse/recycling/composting for licensed operators at other parts of the resource recovery system
- bringing forward the enforcement date for a disposal ban on these landfills to align with the date at which LFG capture systems must be installed for class 1 landfills (e.g. by 31 December 2026).

### **Potential requirement to install landfill gas (LFG) capture systems at landfill sites**

Maybe. We should consider that LFG systems are expensive and cause other emissions in their manufacture.

Thus, we would want to ensure that our measures have suitability considering the cost and manufacture emissions of new systems. We would also want to ensure that the drive towards LFG systems did not interrupt the focus on reducing waste in the first place.

This is not only because waste reduction would avoid methane generation, but also because organic waste in landfill is valuable and should be re-diverted back to our soil, to improve soil health and restore our natural environment.

**Standardised approach to collection systems for households and businesses, which prioritises separating recyclables such as fibre (paper and cardboard) and food and garden waste**

We support this. We believe that simplicity across collection systems would drive behaviour change towards recycling and composting by removing confusion for individuals moving between different areas.

However, we agree with Zero Waste Network, and **would caution that kerbside collection should not disrupt local activities such as community-based composting networks and resource recovery centres.** These local systems offer significant co-benefits such as keeping resources and jobs within communities, minimising transport of waste, and enhancing soil health.

**Transfer stations should be required to separate and recycle materials, rather than sending them to landfill**

We support this move. Requiring the separation of materials at transfer stations allows improved recycling, but also opens up opportunities beyond recycling and helps us to move further up the waste hierarchy. With clean and separate streams, such centres can create opportunities to reuse, repair, remanufacture and repurpose products and materials.

**Proposals in ERP and farm dumps**

Ideally these proposals would apply to farm dumps, but we recognise that policing this requirement could be difficult and may not be worth it.

If farms are focussing on methane emissions, it might be more valuable for them to focus on agricultural methane. But we see that behaviour change and educational initiatives in this space could be helpful, particularly in terms of separating organic

wastes from farm dumps and reducing waste overall. One way to drive the desired behaviour could be to include methane emissions from waste in the farm level planning required by the He Waka Eke Noa strategy.

### **Alternative ideas on how we can manage emissions from farm dumps, and waste production on farms**

We believe that these emissions should be captured in the farm-level emissions plans included in He Waka Eke Noa agriculture strategy, and their reduction should be driven through that strategy.

### **Options that could significantly reduce landfill waste emissions across Aotearoa**

We believe that this strategy must be connected to broader waste strategies and question the need to separate out the methane emissions from waste from our wider waste strategies. We believe the policy drivers for waste emissions need to account for a wider range of impacts than those included in this plan, and encourage a holistic cross-sector approach to waste that aims to really transform how Aotearoa views and deals with waste in a much broader sense.

We also believe that a more holistic view would aid in the effectiveness of communication and educational initiatives. **Multiple plans across different specific areas are unlikely to engage people in behaviour change, and we should focus on a strong and inspiring vision that shows people how reducing waste can benefit their household and their communities.**

We also see some potential in financial incentives to reduce waste. These could apply at the household level (e.g. rates reduction for infrequent waste collection) or at business level (e.g. correcting the financial levers for businesses that make it currently more expensive to recycle than dump to landfill in some areas).

Reference:

[Zero Waste Network Submission](#)

## ENERGY AND INDUSTRY

The level of ambition for energy and industry decarbonisation in this document is inexcusably low. This is particularly frustrating when contrasted with the significant work that is being done by EECA and private sector partners to plan the decarbonisation of industrial process heat. This work, which is beginning to bear fruit in [EECA's Regional Heat Demand Database](#), is demonstrating that industrial heat in the South Island can be very substantially decarbonised by 2030. Similar work is urgently needed for the North Island. This work has been conducted on a “business as usual” basis, without considering the effects that, for example, changing consumer food preferences, or carbon border adjustment measures applied against NZ dairy exports, could have on reducing the need for industrial process heat.

### Decarbonising industrial heat

The Government should:

- **Bring forward its phaseout date for coal use** in low and medium process heat industrial boilers to no later than 2030.
- As part of the Emissions Reduction Plan, **announce a ban on new and expanded coal mines**, and phase out dates for existing coal mines and for coal imports.

**Signal an end to all fossil fuel burning activities to avoid businesses and individuals purchasing assets that will need to be retired before the end of their economic life.**

Which means we need to signal this now! There may still need to be some adjustment and replacement period for already operating equipment but we must prevent additional investment in polluting technology immediately.

- Sharply reduce free industrial allocations in the Emissions Trading Scheme from 2022, and phase them out by 2030 at the latest. Furthermore, **producing a verifiable transition plan of renewable energy, with a firm end date, should become a condition for any business** wishing to receive free allocations.
- Significantly and rapidly increase both the floor and ceiling prices in the ETS so that the carbon price reaches \$250/tonne by 2030.



- **Roll out the decarbonisation pathway work** which EECA has helped to fund in the South Island to the North Island.

We support the creation of a national energy strategy, as signalled in the ERP document. As with other national strategies, it's imperative that iwi and affected communities, not just business, be involved in its creation.

### **Decarbonising electricity**

The structure of the electricity market gives gentailers perverse incentives to burn fossil fuels so they can set and maintain high prices. A key requirement for decarbonising electricity is that the system be reformed so that generators are no longer incentivised to keep fossil fuels in the system.

The corollary of this is that generators have been incentivised to gain resource consents for wind farm projects and then either failing to construct them within the consents period, or waiting until the consent has almost expired. Generators should be incentivised to build consented wind farms and/or penalised for sitting on consents when more capacity is needed.

### **The many barriers to both distributed and grid-scale solar energy need to be removed. This is not just a matter of system design, it is a matter of justice.**

Distributed solar energy, coupled with storage, provides a chance of energy independence, resilience and security of supply for iwi, hapū and remote communities, especially in rural areas.

The current uncertainty around the future of Tiwai Point is harmful to Murihiku and to the nation as a whole. Rather than letting a massive multinational continue to use its market power to gain massive subsidies to consume a substantial fraction of the country's renewable electricity, the Government must complete and clearly signal a transition plan for NZ Aluminium Smelters and for Southland.

As part of decarbonising the public sector, all schools should have solar panels, preferably coupled with battery storage and the ability to sell power back to the grid.

### **Reducing Energy Demand**

Fossil Fuels are energy dense and have given us lots of energy for very little energy spent to get it. Alternatives like solar and wind have a much lower energy return for the energy invested. Our society and economy is used to having as much energy available as they want. The transition to renewables is going to change this and its import like with EV cars, that the government is upfront with the public that energy supply is not a

simple swap of sources. We must support and incentivise reducing energy demand. We need to start the transition to lower energy availability now.

### **Our view**

- **Set targets** for the energy system
- **Phase out fossil gas** while maintaining consumer wellbeing and security of supply
- **Support development** and use of low-emissions fuels
- **Education and Communication around reduced energy demand** and why we need to do this

## AGRICULTURE AND FORESTRY

Many members of Parents for Climate Aotearoa have rural connections, and have active members who both have working and lived experience in agriculture and forestry (including the ETS).

We support our rural communities in both reducing their emissions and adapting to climate change. We want practical nuanced policies and support from the government that assists their transition. **Too often discussions in the public sphere about agricultural emissions seem to miss the complexities rural communities face** and if not well thought out and adaptable we could face serious unintended consequences.

We are concerned about our rural communities and farmers. We know our farmers are under stress from multiple angles including debt which limits their ability to respond, more compliance, inadequate infrastructure and do not feel supported and respected by much of our society. **Climate change is not however, just another pressure or hoop to go through.**

The consequences of inaction will hit our farmers and foresters hard and our society who rely on them. Our climate has changed already and the crops our farmers can grow are changing. **At the same time our farmers and foresters protect and regenerate significant areas of native forests and wetland, which is often under recognised.** Our farmers are world leaders in many aspects and they can be world climate leaders too. Many of our farmers are reducing their emissions and producing high quality food for a much lower environment impact overall. Our foresters are sequestering carbon and providing much needed sustainable materials. Agriculture has gone through many massive changes historically. **Agriculture can adapt and prosper while significantly reducing its greenhouse gas emissions.**

### Agriculture

#### **Support and target farm advisory and extension services to support farmers and growers to reduce their emissions**

Unfortunately, the Government is not often a trusted source of information for farmers. Farmers are the best people to support other farmers to reduce their emissions. There is already some support available for farmers to showcase their improved practices to others through MPI, but this could be further funded and resourced.

At present, a lot of advisors trusted by farmers have a vested interest in the highly polluting status quo, such as fertiliser sales representatives. Given the quantum of the change required to reduce agricultural emissions and the large number of farmers

involved, **the Government needs to support the building of a new farm advisory network that has a significant focus on emissions reduction.** This is not to say that existing farm consultants could not join this network but it is important that they are promoting practices that will lead us to lower emissions.

A strong farmer focussed communications plan is needed to communicate climate change challenges, the urgency of the problem, and the new behaviours that are needed to tackle this problem. **Climate change is one of a number of interconnected challenges we face and it's important that farmers and their rural communities have the information and resources to tackle them collectively.** As part of the education campaign we propose, there needs to be clear information about the role of agriculture emissions and sequestration. There are significant challenges, not least the varying values people have on what and how food is produced. We should focus on the common ground and be honest at the challenges and barriers food producers face.

We recommend the government provide funds and resources to community hubs, groups and organisations that support their rural communities through a wide range of initiatives. These hubs and organisations vary around the country with their community needs. These include catchment groups, community centres, rural women and young farmer networks, Landcare Trust. Piggybacking on existing initiatives will be important, such as catchment groups set up to plant riparian margins. Some catchment groups, such as the Moutere Catchment group in Tasman hosts a range of talks and workshops on climate change and soil as well as planting and water quality. **These trusted groups are often tight on funds and rely heavily on volunteers, which could do significantly more work if better resourced.**

Increasingly rural women are running the business side of farming operations and are vital in key on-farm decisions. **Working with the Rural Womens network to disseminate information** about low emissions food and fibre production systems may make good use of an established network.

### **Support the specific needs of Māori-collective land owners**

Lessons can be taken from Covid-19, where Māori have taken charge of supporting change in their own communities. In order to do this they must be sufficiently resourced. **Supporting a network of Māori farm advisors that work with their own communities to reduce emissions is the best way to ensure their specific needs are met.**

Significantly more financial support is needed for the development and dissemination of matauranga Māori (indigenous scientific knowledge).

Given their collective ownership, Māori landowners typically find it difficult to raise capital for development. It would be great to see KiwiSaver funds or the NZ Super Fund investing in the development of Māori agriculture, with enormous co-benefits for employment, the environment etc.

### **Encouraging uptake of on-farm mitigation practices, ahead of implementing a pricing mechanism for agricultural emissions**

There must be a focus on both mitigation and sequestration on farms. **There needs to be a greater focus on sequestration in agriculture**, including trees, wetlands, peatlands and soil, which have co-benefits for biodiversity, water quality, and resilience. This is a growing focus on many farms already and should be enabled further. This could include additional funding for planting of native trees and alternative production species through catchment groups and One Billion Trees initiatives.

Information and education, as mentioned above should be resourced. Partner with trusted rural organisations and individuals to have on farm and community discussions about the scale of the problem and why we need to all tackle climate change. **Without this shared understanding of the problems, there will continue to be a lack of social licence in both rural and urban communities to tackle climate change.**

As part of the education and information there needs to be a nuanced discussion nationally about biological methane and differences to carbon dioxide emissions. It is clear that the lack of understanding in the wider public is counterproductive, especially to our rural communities.

Resource community led initiatives AND facilitators. Landcare Trust has a wealth of experience of farming, contacts in communities and demonstrated facilitation of workshops, projects, catchment groups and peer to peer learning.

**Provide funding for farmers currently undertaking best practices to enable them to share their experiences with other farmers.** Many of these practices have been identified for some time, e.g. the [Report of the Biological Emissions Reference Group \(2018\)](#).

Reducing nitrous oxide emissions is often phrased as too difficult and is not helpful. All opportunities to reduce nitrous oxide emissions should be supported and encouraged.

Reducing waste from the farm to plate is an important avenue to reduce emissions now.

**Research and development on mitigations Government and the sector to support**

The [Our Land and Water Regenerative Agriculture in New Zealand Programme](#) has a series of reports recently published that provide a good overview of where more research is needed in NZ for regenerative agriculture. There is currently little research on the efficacy of regenerative agriculture techniques in the New Zealand context. **A solid scientific basis is required both to underpin the transformation needed and to showcase our commitment to low-emissions food and fibre.** Relying on results from other countries is insufficient.

More research is needed on soil carbon and practices that reduce, keep stable and increase soil carbon is needed throughout NZ, of different soils and climates. Research like the 2016-2021 programme [Tradeoffs in Reducing Nitrogen Loss and Soil Carbon](#) in Canterbury.

If New Zealand is serious about reducing methane emissions without significantly reducing stock numbers, a lot more research focus and significantly more money needs to be put into research.

We need significantly more research into reducing nitrous oxide emissions, which should also include finding solutions to reduce synthetic fertilisers and improve fresh water quality. This includes arable and horticulture practices.

**Fund significantly more research into Mātauranga Māori and plural knowledge systems like the Mauriora Framework.** This knowledge will not only benefit Māori landowners, but all agriculture.

**Overall we need research that looks at farming as the complex system that they are.** Research that focuses on how we can produce good quality food, with low emissions and environment impact, protects and sequesters carbon and importantly supports farmer and rural communities wellbeing.

**Help for industry and Māori agribusinesses to show their environmental credentials for low-emissions food and fibre products to international customers**

Firstly, New Zealand needs to be able to honestly measure and report on its environmental credentials. In many areas, such as freshwater health, wetland and native vegetation cover, agribusiness is moving in the wrong direction. We have many great farmers leading the way and we need the rest to follow. **Fix practices across New Zealand first, and then tell the story.** New Zealand has been relying on a false narrative of clean and green and the world has wised up to this. Let's genuinely move in a clean and green direction, and then we can tell the world about it. Being not as bad as other countries is not the same as being good stewards of our land and water.

## **Help reducing barriers to changing land use to lower emissions farming systems and products**

As stated earlier, fund local community organisations, groups and initiatives. Many farmers, particularly in the dairy sector have high debt and are less able to take risks and/or change practices. The government in partnership with banks and sector organisations could support high debt farmers to make changes.

The push for production, rather than on farm profit from both the sector organisations and the government is a barrier. **We recommend a rethink of this aspect of the MPI Industries roadmap, where instead the main focus is on thriving resilient rural communities.**

While there is debate on how and who is to reduce methane and nitrous oxide emissions, there are a number of ways to protect and increase sequestration now that also have many other co-benefits. Opportunities to increase sequestration on farms and catchments include:

- Many farmers are undertaking **riparian planting for water quality**. These could be further scaled up and expanded, including gullies and weedy corners.
- **Reduce soil erosion** through a variety of practices such as no till, direct drilling, and agroforestry.
- **Pest management on riparian and native blocks**. The government along with councils, could fund significantly more pest control, both labour and resources for landowners and community groups.
- **Protect peatlands**, reduce carbon loss and restore to long term carbon sinks.
- **Protect, restore and construct new wetlands**, that overtime will sequester carbon
- Practices that also **help build resilience in farms** and catchments from adverse weather events

### **Our view**

We need a rethink on values and goals for agriculture, like the rest of our industries. **There is very little here that discusses the health and wellbeing of the farmers and rural communities.** They are already facing impacts of climate change and government mitigation policies. Mitigation must go hand in hand with helping our rural communities adapt and build resilience to climate change.

**If we do not voluntarily reduce the emissions intensity of New Zealand agriculture, we may find our goods subject to international carbon taxes.** This is not something we can afford to wait and see what happens.

The good news is that, much like other emissions reduction activities, reducing the emissions profile of agriculture comes with a host of co-benefits. Diversifying into agro-forestry or cereal crops or horticulture provides a more stable, resilient and profitable agribusiness. **Reducing dairy operations to once a day milking reduces farmer workload and required inputs including fertiliser and feed.** Removing animals from steep eroding hillsides and wetlands and planting these instead will reduce soil erosion, improve water quality and support biodiversity.

Adaptation needed now

<https://ourlandandwater.nz/news/drought-joint-statement-from-national-science-challenge-directors/>

Act now to meet climate's growing unpredictability, farmers warned

<https://www.rnz.co.nz/news/country/454953/act-now-to-meet-climate-s-growing-unpredictability-farmers-warned>

**The government must work closely with rural communities and their councils across NZ in developing policies.** Much care is needed to minimise unintended consequences. Like everywhere in NZ, we need a just transition for our Agriculture sector and rural communities.



## Forestry

### Forestry as a buffer

Forestry should be reserved for mitigation of emissions that we cannot reduce due to lack of solutions and for historical emissions. **It should not be used as a Get out of Jail free card, as it is currently being used for.**

### Employment transitions in rural communities affected by land-use change into forestry

There are **enormous opportunities for employment** in making our agribusinesses more sustainable:

- Planting eroding hillsides and restoring wetlands
- Fencing to prevent pests from eating native plantings
- Pest control
- Wilding pine and other weed control
- Planting woodlots
- Horticulture - including adapting to changing regional conditions (e.g. Kiwifruit will soon be suitable for Taupo)
- Enable and incentivise more mills and high quality locally made timber products.
- Policies that incentivise wood products and dis-incentivise plastic, steel and concrete.

### Making it economically viable to establish and maintain native forest through planting or regeneration on private land

There are many opportunities to enhance existing activities and programs:

- **Set policies** that will incentivise the use of various timber, including native timbers.
- **Invest additional resources** and money in improving the technology to produce low cost native seedlings
- **Providing a greater level of subsidy to farmers**, in recognition of the greater cost of establishing native trees and the greater level of co-benefits (e.g. biodiversity) that come with planting native trees.
- **Maintenance** (e.g. weeding, releasing and pests) of plantings and regenerating native blocks are a major cost and time investment. Well resourced, subsidised maintenance contractors could ease the burden on landowners, both in planning and completing maintenance. This could enable more ambitious plantings throughout the country.
- **Providing more outreach and support** to ensure farmers have the best information on what plants should be planted where.
- **The ETS has a number of limiting factors** that could be changed.

- The lookup tables for native forests need updating as they have been regularly criticised that they underrepresented sequestration by native forests. **The new research by Tane's Tree Trust goes some way to addressing this.**
- The minimum width of forest is too wide for many riparian strips or small for gully blocks to be counted in the ETS. Hopefully these will be counted in the He Waka Eke Noa agreement. We note that there are many areas, especially adjacent to streams (new national set back policy), steep slopes and gullies etc in forestry land that would be suited to permanent native plantings or assisted regeneration. **Policy settings should enable this, not inhibit it.**

### **Kinds of forests and forestry systems**

The Government should encourage all alternative kinds of forests and forestry systems. Giving farmers a suite of forestry options that they can choose from will be more attractive than trying to force everyone to do the same thing.

However, there is also value in supporting economies of scale to be developed. **If the Government identifies promising opportunities, it could support the development of new regional based forestry initiatives in particular species, such as totara, redwood or eucalypts.** Tane's Tree trust and Farm Forestry NZ should be supported to continue their work and research.

At present though, given the long time frames and state of the industry, it is unlikely with current policy and market settings large areas of production forest will be planted with species other than radiata. There have been many decades of research and development invested into radiata, with ongoing demand for timber. **To diversify species, we need a combination of research, including different harvesting techniques, locations, breeding and incentivising development into timber destinations,** including mills to process the timber and products.

This will take time and given the lack of market and R&D underpinning alternative species, targeted subsidies or guarantees inside or outside the ETS is likely needed. Alternatively small block plantings as part of diversified farm operations, as demonstrated by some Farm Forestry NZ members could be the main focus for alternative species, both exotic and native.

### **Limits needed**

Some policies are needed to minimise adverse outcomes. There are widespread fears of pine forests planted for carbon credits only, with little or no management. **There will be no ongoing employment from these forests and they risk becoming pest and**

**weed reservoirs and a fire risk.** Many foresters and companies take their responsibility to their land and community seriously and that involves significant cost and time. All forest owners should meet their management, environmental and community responsibilities and this should be a condition for receiving carbon credits.

At present local communities have very little say in land use change. There needs to be national policy settings, but the **decisions need to be made by local councils and communities who know their land and environment best.**

### **Policies needed to seize the opportunities associated with forestry while managing any negative impacts**

There are many initiatives and opportunities, these include organisations already mentioned, like Tane's Tree Trust and others like the Right Tree Right Place initiative by the [Hawkes Bay Regional Council](#).

**These local collaborative initiatives have multiple outcomes and benefits, including community wellbeing.** We recommend supporting projects like these that are led by communities and councils.

Further work is needed on reducing the adverse effects of management practices. There has been a notable change in some areas with the latest forestry management policies. Given the scale of afforestation and potential significant profits these owners may get, there needs to be a return also for the communities and biodiversity, while also balancing the risks of forestry.

### **We need to support the many afforestation opportunities at different scales.**

These include planting natives in streams and gullies in production forest, which have a multiple of benefits for biodiversity, sediment mitigation in some areas and potentially reducing fire spread. We must continue to subsidise native plantings and increase the access to all sizes of land areas.

### **Using more wood and wood residues from our forests to replace high-emitting products and energy sources**

We must reduce our use of emissions intensive concrete, steel and plastic. Wood should be used more as well as using less resources that have longer lifespans. We currently produce large volumes of wood, with a significant portion exported. To make decisions on whether we need more forests for wood we need more information and analysis on the volumes currently produced and various scenarios of potential need domestically.

## **Role of central and local governments and the private sector in influencing the location and scale of afforestation**

Central and local governments have a role in determining and communicating at a landscape scale, the best uses for different land types. If we had done this 20 years ago we would not have large scale dairy in Canterbury and all the environmental problems it has caused. We also would not have planted the highly eroding hillsides of Wairoa and Gisborne to be planted in pines for harvest.

Central and local governments have a role in promoting good farming practice, through regulation and supporting good practice. **Decisions need to be made by local councils and communities who know their land and environment best.**

Foreign ownership of forestry resources in New Zealand is problematic. We should not be selling land to overseas owners. **We have long relied on foreign investment but this can be done through forestry rights rather than land sales.** Some overseas companies are more able and committed than others, such as One Forty One in Tasman, which is a forestry company not a pension fund manager etc. As mentioned earlier there needs to be clear responsibility taken on for all land owners and managers and they must meet environmental and community commitments.

Farmers and foresters must reduce emissions and improve water quality, but be provided with a suite of options to choose from and plenty of information and support to achieve these aims.

## **Pest control and management**

Having a nationwide 1080 programme to get on top of our possum problem. We need to be having conversations on the serious biodiversity impacts of deer, goats, tahr, pigs etc. **As mentioned above in several sections, we need a cultural shift in order for all of us to make the needed changes.** Without the grazing pressure from these pests, New Zealand's native vegetation will regenerate on its own.

## **Our view**

We see a gap in the afforestation framework. Some of the ill feeling in rural communities comes from a view that they are changing, so the rest of the country can continue as normal. We need everyone in all parts of the country to get behind mitigation AND sequestration. We have significant land areas throughout the country that are from medium density urban land to lifestyle blocks. These land areas combined provide significant opportunities for tree planting that provide multiple benefits. Many urban areas continue to lose trees. **Everything counts and for urban environments trees have a multiple of benefits, including reducing urban heat island effect, various**

**health benefits and sequestration.** We need tighter controls on removing trees and integrated urban planning that drives urban afforestation. This should also be a part of reallocating road space to other transport modes. Many of our houses are still poorly designed for minimising overheating in summer and deciduous trees can help mitigate this at low cost.

**Rural subdivisions and lifestyle blocks are an untapped opportunity to increase biodiversity, water quality and carbon sequestration.** We recommend targeted resources, information and funds aimed at these landowners. In some regions, small rural landowners are part of catchment groups and get support from the likes of Landcare Trust, where many more currently receive little attention and support. ETS settings could be changed to enable smaller blocks of natives and exotic plantings. **Another opportunity is to enable numerous joining landowners to collectively claim carbon credits in the ETS.**

## ETS

### **Our overall thoughts on the ETS system**

While we appreciate and support efforts being made to improve the system, we are continually frustrated by the lack of urgency. **The purpose of the Emissions Trading Scheme (ETS) is to reduce emissions.** The ETS has sadly not lived up to its promise and after much tinkering over the past 20 years our emissions continue to rise. It has not been successful. The focus of the ETS must be on a rapid reduction of emissions, rather than protecting Emissions Intensive, Trade Exposed (EITE) industries. There have been far too many free allocations and whole sectors excluded, making the system ineffectual. We need a laser focus on reducing emissions across all sectors and we do not see these amendments achieving this.

**Given its history and recent changes, we have no confidence that the ETS is the best system to drive rapid emissions reductions.** We note that there is little faith in the system from many users and extensive tinkering over the decades has undermined confidence in it. The system remains unbelievably complex and the fact that many participants in forestry are not in the ETS side and for those that are, many need to employ consultants to manage their obligations is a sign that the system is not fit for purpose. This lack of confidence both within and outside the scheme is slowing emissions reductions.

**The ETS needs to be grounded in fairness.** EITE industries have received 20 years of free allocations while emissions have continued to rise. This is a policy failure. Too many free allocations have been given and too many of our emissions exempted to make the system effective. New Zealand will need to change this if we are to bend the curve and get anywhere close to our commitments under the Paris Agreement. Money spent on continued corporate welfare through Industrial Allocation is money that cannot go to support communities who will be affected by climate change.

**We advocate for a rethink on how allocations are made.** This rethink would look at what sustainable activities would be compatible with a safe climate, wellbeing economy and healthy communities. We are committed to supporting a just transition to a low carbon economy for communities and whānau. We are less concerned about the welfare of large international companies who run the majority of the EITE industries in New Zealand, who have had decades to plan and reduce their emissions. Free allocations impose a burden on the tax system and is money that cannot be spent on supporting that just transition.

**Transparency, accountability and open reporting are essential to the future of the ETS.** To date there has been too little easily accessible and understandable information available on the ETS. We need to know how many units companies hold,

how their emissions are tracking and what support they are eligible for. Having this information publicly available will help to hold companies and the government accountable for emissions reduction. Our continually rising emissions and the opaque and complex nature of the current system makes it very difficult to tell if we are moving in the right direction or not.

### **Treatment of forestry in the NZ ETS**

The key is to change regulatory settings to absolutely guarantee that we are reducing gross emissions and not relying on additional forestry to offset these. **We are extremely disappointed that the recently announced NDC relies heavily on offsets and paying other countries to plant trees and reduce emissions.** This ignores that actions to reduce emissions at home have enormous co-benefits that New Zealanders need, as we outline throughout our submission. We need a rapid switch to public transport and active transport to reduce respiratory illnesses, road deaths and obesity. Spending money on reducing or even eliminating fares for public transport would be an action worth spending on. Vastly accelerating protected cycleways would bring similar co-benefits. Providing sufficient funds to decarbonise all schools, hospitals and other public buildings for heating.

We see the current government being incredibly timid in their level of ambition. **There appears to be little appetite to have difficult conversations with New Zealanders about the shifts in behaviour that are required. And if this failure continues, then forestry will continue to be relied on to do the heavy lifting.** This is a failure of imagination and courage. New Zealand can be a much better place to raise our children, if we only lift our eyes to the possibility of doing things differently. It is frustrating how embedded the status quo is and how reluctant anyone is to raise it, even in discussion documents.

Planting large swathes of New Zealand in pine trees that may never be harvested because the carbon return is too good, is something that the rural sector are already vocally opposed to.

Considering the planting of production pine to be an effective offset for a gas that stays in the atmosphere for 1000 years is just wrong. **Any trees planted as offset for greenhouse gas emissions must be planted and replanted for the entirety of the 1000 years.** At the rate that New Zealand continues to emit greenhouse gases, we will quickly run out of plantable land.

We have delayed emissions reductions for the past 30 years. It cannot continue. Our children and grandchildren will not forgive our ongoing inaction. **The only path forward at this point is to be honest with New Zealanders about the huge**

**challenge ahead of us**, and to forge ahead making real reductions in emissions wherever we can as fast as we can.

### **Constraints on forestry inside the NZ ETS**

There is too little detail on what these constraints would be and what the consequences could be. Currently forestry is used as the main tool to meet our budgets, this is unacceptable. We must rapidly reduce our emissions and use forestry to help. Forestry, especially pine plantations are vulnerable, both from events such as fires and wind throw and changes in policy and market factors.

### **Where is the resilience and adaptation in these settings?**

The offsets need to be rapidly phased out and instead used for sequestering historical emissions and contributing to global efforts to bring CO2 levels down to safer levels (e.g. 350ppm). **There is significant confusion and misinformation about offsetting and its role, which is resulting in businesses and the public believing that offsetting their emissions is a solution** - clear, accessible and correct information is needed.

### **What does the Government need to consider when assessing options?**

Policy settings on forestry are having big impacts on land use and rural communities. The impacts on these communities are as important as sequestration. There must be a set of goals, given equal status of: mitigation, adaptation and resilience. **This means supporting our mitigation goals, while helping our communities and nation adapt to climate change and building resilience in our communities.**

The government also needs to consider the future wood supply we need to support a transition to a low carbon economy. Forests planted solely for carbon credits will not be managed with sufficient care to ensure that New Zealand produces timber of the right quality to return to pile built houses, and timber framing over steel. We need forests to be planted at appropriate densities and maintained (e.g. thinned and pruned), to produce high quality timber. These practices are already waning in the industry due to economic considerations. Care must be taken with policy settings to ensure that we are producing the raw materials we need for our future needs.

### **What unintended consequences do we need to consider to ensure we do not unnecessarily restrict forest planting?**

Scale is important, at present the system seems to favour large scale plantings of single species with large resources behind them.

Planting natives that will allow selective harvesting in the future.



## **Our view**

It is clear that in order to financially compel decarbonisation, the price of emissions needs to significantly rise. Unfortunately, the current policy settings allow companies to choose the easy option of offsetting through forestry. It is not until the NZU price nears \$250 will we see companies being financially incentivised to replace high emitting technology. At the current pace of NZU rise, NZ will be completely forested by then.

**We need to decouple the carbon price from forestry offsetting.** There are many ways this could be done - for example, we could require 2 (or many more) tonnes of CO2 equivalent to be sequestered in order to offset 1 tonne of CO2 emitted. If for example, we required 5NZU's to offset 1 tonne of CO2 equivalent, we would effectively reach the \$250/tonne threshold mentioned above.

Another approach could be to cap the amount or percentage of units that are able to be offset by emitters. If emitters are only able to offset 10% of their emissions, there will not be such a heavy push to forestry.

**To ensure a just transition, we could require the funds earned by the ETS to be recycled back to communities affected by afforestation to invest in a just transition.** We could also use these funds to provide more incentives to plant native forest to account for the greater establishment costs.

## BEHAVIOUR CHANGE

A long term public campaign like smoking and drunk driving to educate on climate change, actions we can take and what governments are empowering us to be able to do. **A centralised cross agency communications department and full public education programme - not just focused on schools.**

We want to see funding for local councils, churches, community groups to run outreach and educational programmes.

We want to see a focus on community change, not individual change - we need to bring everyone together on this.

**Our communities need information from the government that is more accessible. This plan/discussion document, for example, is high level, technical, and inaccessible to most, except those already interested.** If the government wants to hear what communities think, we need to find new ways to engage.

Currently, people need to actively seek out information on the government's climate strategy and what they can do. **Compare that to our Covid-19 response, where information was simple, clear, and hard to avoid.** This communication style helped us to achieve much broader engagement and stronger agreement and commitment to the required actions.

### Trusted messengers

People trust leaders in their local communities, as well as friends and family. Studies have shown that one of the strongest climate actions individuals can take is discussing climate change with friends and family (e.g. [Discussing global warming leads to greater acceptance of climate science](#)). **A behaviour change campaign centred around community discussions, rather than individual change, would help to bring more people along on the journey.**

We would support a fund that would embed the behavioural change campaigns in policies and programmes.

As mentioned above we want to see funding for councils, churches, community groups to run outreach and educational programmes. **Schools can play an important role in educating our tamariki and rangatahi about climate issues.** However, if our young people then go home and out into the community and find that these big issues are not

being talked about and taken seriously, the disparity between education and action contributes to their anxiety about climate issues.

**Education campaigns also need to work with a recognition that people are in different stages of life, different communities, and different stages of their climate journey.** Communication plans could also include differentiated messaging for people already engaged, people firmly against, and people who can be persuaded.

### **Our view**

To focus on individual choice is to misunderstand the challenge that we face. **People can't choose what is not available and they can't choose what they can't afford.** And what is available and affordable is controlled by systems and governments, not by individual choices.

Messages that are empowering, empathetic, future focused, collective, while also reflecting the urgency of making change.

Our communities need storytelling and a strong vision, brought to them with creativity and imagination. **Rather than technical detail, people need to see a positive vision for the better world we can create together.** Minds and hearts aren't changed by facts and figures, they're changed by stories and values and discussions with trusted family and friends.

“Effective communication on climate action can build hope. It can improve people's understanding of the causes and solutions, and motivate them to be agents of change. Motivating collective climate action at the right level requires more than communicating the facts and the dangers. As experts, advocates, and campaigners we need strategies grounded in the evidence of persuasive communication.” ([How to Talk About Climate Change: A toolkit for encouraging collective action, 2019 — The Workshop](#))

Our actions today are setting up what the world looks like in 2050, and people need help to draw the connection between how our actions today could change the path that we follow.

*“Behavior change is not just about communications campaigns, it's about understanding the real barriers and supporting people to take the required action. We need to halve consumption emissions by 50 percent by 2030 - probably more for NZ as a wealthy nation, yet there was only one idea on how to do this - setting up a behavior change fund which didn't give details about how it would be administered, how much, etc. This area needs much more focus. I feel like it's shifting the problem to our kids who*

*will be the ones to clean up the mess we are continuing to create as the older population will not be here when things get challenging.”*

## **BUILDING AND CONSTRUCTION**

### **Mandatory participation in energy performance programmes for existing commercial and public buildings.**

We would support introducing mandatory participation in energy performance programmes for existing commercial and public buildings. Improvements are generally compensated for by reducing heating, cooling and lighting costs. Where possible, these improvements should be funded by businesses. But support through a contestable fund, might help accelerate improvements, where funding is an issue for some businesses. Perhaps paying for improvements through council rates could be an option?

### **Helping the building and construction sector reduce emissions from other sectors, such as energy, industry, transport and waste**

- **Raise the standards** in the building code to match the highest performing nations overseas.
- Ban lighting that is not energy efficient.
- **Educate the sector** on greater use of timber in buildings to help move away from the steel and concrete status quo.
- **Support NZ businesses** to develop wood building technologies and manufacturing capacity. NZ wood processors, with only a handful of exceptions, are using old and outdated technology.
- **Support research and innovation** for building material reuse and recovery rather than demolition.
- **Significantly increase the waste levy** for building and construction to provide financial incentives to reduce waste.
- **Provide information and education** on best practice to reduce emissions. A lot of the building and construction industry is completely unaware of the carbon footprint of their activities. Encourage and incentivise innovation in low emissions building and construction practice.
- Recognise that a large part of the building and construction waste are impacted by urban planning. Building high rise buildings in central city locations are the most low impact per household, in both construction emissions and use over time. Building McMansions in distant suburbs with no amenities or transport links needs to be curtailed. Policy settings need to incentivise high density housing in cities. However, we are currently seeing Councils pushing back on regulations to increase densification. We must not allow older wealthy Councillors to stymie changes needed to address the climate crisis and housing crisis.

## **End new fossil gas connections in all buildings by 2022 and for eliminating fossil gas in all buildings by 2030**

Ending new fossil gas connections in all buildings could be one of the few easy early wins. There are electric substitutes easily available at the same price point. Given the long time frames needed for so many other mitigation options, it seems unnecessary to wait even until 2025 to do this, do it now! We would suggest a more ambitious date for eliminating fossil gas in all buildings - say 2030. This is supposed to be the decisive decade!

## **Supporting people, communities and businesses to reduce demand for fossil fuels in buildings**

First, a comprehensive education campaign is required. **Many people do not understand that “natural gas” is in fact a fossil fuel that is contributing to climate breakdown. Emphasis should be given to the alternatives that are available.** We suggest vocally exempting gas cylinders for bbqs from the phase out to avoid the backlash this suggestion received when raised by the Climate Change Commission.

**An immediate ban on advertising of fossil gas would be useful.** There has been deceptive marketing recently by fossil gas companies and they must not be allowed to peddle false narratives that slow a much needed transition.

Raising the level of insulation required in buildings, either when built new, or when renovating, would help reduce demand for heating over time.

Improving the energy efficiency standards for appliances and light fittings, to ensure that only efficient models are allowed to be imported would help. Grants and financial support should be available to low income households to bridge the gap to the higher cost of more efficient appliances.

## **Provide a clear end date for the use of fossil fuels**

Providing a clear end date for the use of fossil fuels (for example no coal by 2025, no gas by 2030) would provide certainty for businesses when investing in improvements. Many businesses will be able to afford to make the changes, as seen by the actions of supermarkets investing in solar panels. Where businesses are struggling to afford the changes needed, a low interest loan scheme could be made available, or a contestable fund.

## **Adverse impacts on particular people or groups**

Some small businesses are likely to be affected by this change. **Clear early communications of the coming changes would help to avoid people investing now in assets that will be stranded in the near future.**

Having low cost funding options and grants available could help ease any adverse impacts.

**Ensuring the needs and aspirations of Māori and iwi are effectively recognised, understood and considered within the Building for Climate Change programme**  
We support Māori and iwi being empowered to meet their own needs and aspirations within the Building for Climate Change programme. **Resourcing for participation in consultation and grants to support transition for owners of buildings would be useful.** Māori and iwi can find it more difficult to secure capital for improvements. The Government could have a role in supporting financing.

**Our future vision for Aotearoa includes a place where all New Zealanders have a warm, dry, safe and durable home to live in.**

The Healthy Homes Standard should be updated to phase in higher standards that reduce emissions. This would include removing gas cooking and hot water and replacing it with electricity and replacing all lights with LED's.

Houses built by Kainga Ora should showcase the highest standards for low emissions building and low emissions living - with no steel or concrete, high levels of insulation, LED light bulbs and efficient appliances. **These will be very low cost houses to live in, which is appropriate as those on low incomes have other things to spend their limited incomes on.**

Most people cannot afford the high cost of retrofitting existing houses to be warm, dry and energy efficient. It would be helpful to have low cost funds available through councils to enable people to retrofit houses to higher standards but spread the costs over the next 50 years.

## CONCLUSION

Like Covid-19, there are many benefits of taking action and early we should follow that lesson with climate change and not delay or dither further. Many of the changes needed will improve most people's lives. The co-benefits however are not widely known, which creates a barrier to change as in the vacuum of information there are numerous assertions that reducing emissions will only hurt us and we have way too much to lose. **We would like to see a more comprehensive section of the co-benefits in the final plan.**

We would like to see a comprehensive education campaign recommended addressing what the problem is, what we need to do about it and how. **Focus on systemic change in order to empower community led change including farmers through catchment groups and collective management of issues.** We want to see unpaid community work and outreach valued by funding paid positions for people who know their communities well. **We want to see Māori and Pasifika being funded and resourced to lead.**

We want to see a well funded cross agency working group to implement these programmes effectively and in sync with each other, recognising the interconnections between each sector.

**We want an Aotearoa New Zealand and wider world that values and cares for each other and our environment.** We want our tamariki and mokopuna to grow up with clean air, healthy rivers, safe streets, well planned 15/20 minute cities, healthy affordable homes, the easiest transport choice is climate friendly, affordable and accessible, and by ensuring we center our most vulnerable and marginalised communities - we are then looking after everyone. **We want a safe climate for our children and loved ones.**

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