CANTERBURY Mayoral Forum

A strong regional economy with resilient, connected communities and a better quality of life, for all.

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Ministry for the Environment PO Box 10362 Wellington 6143 New Zealand

By email: climateconsultation2021@mfe.govt.nz

Canterbury Mayoral Forum and Regional Transport Committee submission on the Ministry for the Environment's Emissions Reduction Plan discussion document, *Te hau mārohi ki anamata: Transitioning to a low-emissions and climate-resilient future*

- The Canterbury Mayoral Forum (CMF) and Regional Transport Committee (RTC) thanks the Ministry for the opportunity to make a submission on the emissions reduction plan discussion document.
- 2. In this submission the CMF has provided comment on the key issues for Canterbury in the consultation document.
- 3. The RTC has contributed to the transport matters outlined in this submission and supports the Mayoral Forum's comments on the remaining aspects of the discussion document.

Background and context

4. The CMF comprises the Mayors of the ten territorial local authorities in Canterbury and the Chair of the Canterbury Regional Council (Environment Canterbury), supported by our Chief Executives. The purpose of the Forum is to promote collaboration across the region and increase the effectiveness of local government in meeting the needs of Canterbury's communities.

Mayors standing together for Canterbury.

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- 5. All Canterbury councils actively participate in the Forum: the Kaikōura, Hurunui, Waimakariri, Selwyn, Ashburton, Timaru, Mackenzie, Waimate and Waitaki District Councils, the Christchurch City Council and the Canterbury Regional Council (Environment Canterbury).
- 6. The Canterbury RTC is comprised of one representative from each of the Road Controlling Authorities (RCAs) in the Canterbury region plus two regional councillors and Waka Kotahi. The committee was established pursuant to s106 of the Land Transport Management Act 2003 (LTMA). The principal responsibilities of the RTC are to:
 - develop a Regional Land Transport Plan for the Canterbury region
 - · ensure coordination of transport activities across road controlling authorities, and
 - represent and advocate for the transport interests of the Canterbury region.
- 7. The Canterbury Regional Council is also the secretariat for the South Island Regional Transport Committee Chairs group.
- 8. We note that Environment Canterbury, the Christchurch City Council, Selwyn District Council, and the Greater Christchurch Partnership are also making individual submissions. We support careful consideration of these submissions.

Mayoral Forum's Plan for Canterbury

- 9. The CMF published the *Mayoral Forum's Plan for Canterbury* in September 2020, which sets out the CMF's five key priorities in this local government term.
- 10. One of the key priorities is:
 - climate change mitigation and adaptation reducing our carbon footprint, building community resilience and making our infrastructure as strong as it can be.
- 11. Responding to climate change underpins the priority the CMF gives to environmental management and extends to:
 - measuring and reducing our own carbon footprint as councils
 - contributing to the design of central government policy and regulation and advocating for strong central government leadership through multi-party agreements to minimise political short-termism
 - a co-ordinated regional climate change risk assessment
 - planning ahead in our Long-Term Plans and 30-year Infrastructure Strategies to make our infrastructure as resilient as it can be
 - systematically factoring climate change mitigation and adaptation into our planning documents including the proposed Regional Policy Statement in 2023.
- 12. Given the importance of climate change, in 2019 the CMF established a Climate Change Steering Group, made up of a subgroup of mayors and chief executives, which maintains a watching brief on climate change matters for the Mayoral Forum and provides political support for and oversight of the important work of the regional climate change working group.
- 13. We welcome this opportunity to provide Canterbury's view on the matters that should form part of New Zealand's emissions reduction plan.

Regional Transport Committee

- 14. The RTC is responsible for preparing Canterbury's Regional Land Transport Plan (RLTP) and for governance and oversight of the activities contained in it. The RTCs work programme is built around 6 key themes from the Canterbury RLTP:
 - safety: reducing deaths and serious injuries on the transport network by 40%
 - growth: ensuring the RLTP programme of activities supports planned growth across the region
 - maintenance: ensuring a sustainable approach to funding and maintaining our existing
 - emissions: reducing greenhouse gas emissions from land transport by 30%
 - resilience: improving our understanding of, and responses to, network vulnerabilities arising from climate change and natural hazards
 - freight: developing more sustainable options for the movement of freight, including a 100% increase in the tonnage of freight carried by rail.

General comments

- 15. The CMF and RTC welcome the release of the discussion document as a significant step on the pathway towards achieving New Zealand's climate goals. We support the intent of this plan (the need to rapidly and significantly reduce greenhouse gas emissions) and welcome the additional details, funding commitments and legislation needed to ensure we reach our nationally determined targets.
- 16. Most importantly, we recommend that the Emissions Reduction Plan moves beyond the "what" (the targets) to the "how" (the policy mechanisms that will be used to achieve them). We note the gap between the level of ambition that the discussion document lays out and the proposals that it suggests. We note the significant gap between the actions proposed in this draft plan and the targets set by the Government. In our view, New Zealand is not showing leadership by proposing to use international offsets for up to 66% of the country's greenhouse gas emissions, instead of reducing emissions domestically. We believe that investing in local innovation and solutions will deliver numerous and long-lasting benefits for New Zealand.
- 17. To this end, we recommend significantly more detail on the interventions that will be put in place, how they will be funded, and how various policy frameworks will be aligned to achieve climate objectives. This will deliver certainty for local government, Tiriti partners and businesses.
- 18. Local government plays a significant role in New Zealand communities' transition to a lowemissions and climate resilient future. Therefore, we recommend developing a clear ongoing partnership approach with local government to support development and implementation of the Emissions Reduction Plan going forward.
- 19. We also recommend providing interventions that will support local government to help deliver emission reductions. Examples include:
 - decision-making tools that integrate climate change into cost-benefit analyses e.g. emissions impacts, and implications of future climate policies such as carbon shadow pricing
 - emissions reporting standards that can be tailored to local communities.

- 20. We also recommend developing cross-sector minimum standards for emissions e.g. appliances, building materials, other products, housing, and waste disposal. We consider that standards, if developed in consultation with industry experts and impacted communities, will deliver tangible emissions reductions in a way that provides a level playing field.
- 21. We welcome the mention of the needs of rural communities within the discussion document, but we note that this is largely confined to a proposal within the Transport section. Instead, we recommend that the Emissions Reduction Plan expands this to a cross-cutting rural communities section that details how all relevant emissions mitigation policies will be tailored so that they are appropriate to a rural community context.

Transition pathway - principles for the transition

- 22. We support a vision that makes it clear that we need to return to living within planetary limits, reflecting our climate and biodiversity emergency declaration.
- 23. We support the discussion document statement to ensure that every government decision is consistent with climate goals.
- 24. We recommend this statement can be formulated more ambitiously by including central-, local government, iwi/Māori, communities and business leader decisions to be consistent with climate goals.
- 25. We support an evidence-based approach.
- 26. We recommend the evidence-based approach extends to driving the behaviour change that's needed to reduce emissions e.g., psychology and social science.
- 27. We support the principle of embracing environmental and social benefits beyond emissions reductions, and suggest broadening this to benefits from economic transformation, in particular for low-income communities.

Working with our Tiriti partners

- 28. We note that iwi/Māori and local councils are already undertaking significant partnership approaches. Within Waitaha/Canterbury, models that could be referenced when designing mechanisms to help integrate Te Tiriti partnerships more consistently include:
 - Ngā Papatipu Rūnanga and Environment Canterbury's Tuia programme
 - Greater Christchurch Partnership
 - Urban Growth Partnerships
- 29. We also note the Ngāi Tahu Climate Change Strategy as an example of a successful Māoriled strategy.

Making an equitable transition

- 30. We support the level of attention afforded to equity. The transition to a low-emissions transport system for Aotearoa, and particularly the greater use and application of pricing mechanisms, has the potential to exacerbate existing inequities in access in many of our communities.
- 31. The CMF has previously provided feedback to the Climate Change Commission that the transition must reduce emissions with pace while allowing the country to continue to grow so that future generations inherit a thriving, climate-resilient and low emissions economy. A more inclusive approach working with communities, and a more holistic view of costs and benefits across government, is needed. We consider these points remain valid and urge that a just transition is given the priority it deserves.

Government accountability and coordination

- 32. We support the acknowledgement of local government leadership in this area and support further partnerships with local government such as through Urban Growth Partnerships and new models of collaboration such as Regional Transition Partnerships.
- 33. We suggest encouraging local government to join the Carbon Neutral Government Programme could increase the use of shared methodologies, enable benchmarking and reduce inefficient spend of rate payers' money in areas where investment has already been made.
- 34. We would like to see greater co-ordination of policy direction across central government relating to emissions reduction, in particular the reform of the resource management system, the National Policy Statement on Urban Development and development of the National Adaptation Plan. Presently, there are seemingly conflicting outcomes sought from various policy statements on transport and urban development which impede real progress being made to reduce emissions.
- 35. We suggest also including other spending mechanisms (such as the National Land Transport Programme) into the analysis of how to fund positive climate action.

Funding and financing

- 36. We note innovation is a particular area where the funding structures that are available are creating barriers to local authority investment. As innovation is considered an operational expense, Councils are required to fund this through rates alone. This means it is significantly constrained in comparison to investment in infrastructure for which, as a capital expense, councils are able to access other significant funding streams.
- 37. We therefore recommend looking into further seed funding for local authorities to invest in emissions reduction innovations. As an example, we note the success of the Waka Kotahi Innovating Streets fund.

Behavioural change fund

38. Previous feedback to the Climate Change Commission emphasised need for a large-scale public and behaviour change programme.

- 39. We note that behaviour change is the most critical and under recognised aspect of achieving the sought targets for the transport sector. Government must also understand better what drives choices through understanding the psychology, barriers to entry, values, norms, expectations, social movements, influencers, desired experience etc. This behaviour and market research knowledge should be shared with local government to more cost effectively support the behaviours needed throughout the country.
- 40. More specifically, we would support expansion of bike skills programmes (e.g. BikeReady) so that they cover more people.

Planning - Additional measures beyond resource management system reform

- 41. We recommend upskilling in the planning profession, both to adapt to the more outcomesfocussed approach of the new Natural and Built Environment Act and to make emissions reduction a core component of planning considerations. This is a very significant shift from the current approach of minimising the adverse effects of proposals.
- 42. We want to emphasise the importance of creating a direct link between recommended actions and their emissions impact. More tools need to be available to easily estimate the emissions impact of an initiative/approach.

Circular economy

43. We have previously provided detailed feedback on relevant Climate Change Commission recommendations.

Transport initiatives and actions

- 44. We support in principle the initiatives and actions proposed for reducing transport emissions during the first budget period. We also support the proposed targets for transport.
- 45. However, there are significant barriers to be addressed to ensure we meet these targets, including insufficient funding, current investment and decision-making models not being fit-for-purpose, and a need for stronger coordination and delivery mechanisms across both central and local government.
- 46. While we recognise that urban areas have greater capacity to reduce transport sector emissions, we also support the increased emphasis in the ERP on how the proposed targets for transport could be met in rural areas and areas with low urban influence. We recommend further guidance on this. Rural communities are often the most transport disadvantaged with fewer opportunities to contribute toward the proposed target of a 20 per cent reduction in car and light vehicle kilometres travelled by 2035.

Integrating land-use, urban development and transport

47. We support the Plan's intention to better integrate land-use, urban development and transport planning and investment to reduce transport emissions. We support the role of strategic planning and investment in lowering emissions in our urban centres by planning for more compact urban forms that support transport choice.

- 48. However, to ensure success, we recommend stronger mechanisms to deliver on spatial plans and direct growth outcomes. For example, we think emissions impacts should be a material consideration in resource management decisions.
- 49. We note that delivering a quality, compact urban form requires upfront investment in infrastructure. This includes enabling local government to begin levying contributions on infrastructure 30 years in advance, and on projects where there is lesser certainty as to how, where and when the project will proceed.
- 50. As noted in paragraph 34 we would like to see greater coordination of policy direction across central government relating to emissions reduction. Currently, there are conflicting outcomes sought from various policy statements on transport and urban development which impede real progress being made to reduce emissions.
- 51. Finally, to complement the longer-term emissions reductions that will be delivered by more integrated planning, we also recommend more active, tactical interventions such as road space reallocation to make a start on encouraging mode-shift and reducing emissions within the next 3 5 years.

Requiring transport emissions impact assessments for urban development

52. We support requiring transport emissions impact assessments in consenting/activity approval processes for high trip-generating activities.

Aligning transport planning and investment with emissions reduction goals

- 53. We recommend that any review of the role of RLTPs should also consider the governance of this through regional transport committees and the potential inclusion of other transport modes e.g. rail and coastal shipping. The current balance of investment in existing roading infrastructure versus all other transport investment will not deliver the amount of shift needed to meet the proposed targets.
- 54. In making the transition, we recommend considering the capacity of local authority transport staff in smaller rural councils.

Encouraging mode shifts

- 55. We broadly support the proposal to review and implement the Greater Christchurch mode shift plan, but this will require central government support for its implementation.
- 56. We support the proposed approach in the first budget period to substantially increase funding for walking and cycling improvements, and the emphasis on support for local authorities' to design and deliver these at speed.
- 57. We support fast-tracked processes and new mechanisms to reallocate existing road space but note that this should be within environmental limits, and not at the expense of mana whenua outcomes (e.g. in proximity to wāhi tapu sites). It would also require strong guidance on parking, specifically addressing how the removal of parking aligns with and delivers on higher-

- level outcomes. Reallocating road space and removing parking are very contentious interventions for our communities because they remove some options for people.
- 58. We support the direction to investigate changes to policy and funding settings for a 'build back better' approach to renewals. Maintaining and renewing our existing road networks forms most of our regional land transport expenditure and we need to consider new approaches.
- 59. We also support integrating equity into this approach. Bringing a spatial lens over transport decision making that carefully considers the locations and groups in our community with the least access to opportunities and who experience the greatest marginalisation, will enable a more just transition.

Congestion pricing and other pricing tools

- 60. We agree that pricing is a powerful tool to influence behaviour, and that we need more tools and better tools. However, the use and deployment of these tools needs to respond to local context to achieve its intended outcomes and avoid unintended consequences. We also think that behaviour change programmes have a significant role to play.
- 61. We note that pricing tools have the potential to support a range of transport outcomes, including enabling a shift to a more user-pays approach to funding road maintenance. Applying new pricing tools could allow a fairer allocation of costs, particularly for low volume, high value roads such as those used by forestry and quarrying operations.
- 62. We particularly support the greater use of pricing mechanisms in locations that are already well served by alternative transport modes, or in combination with investment in making alternative transport choices more attractive. Their use and application need to be considered spatially and account for local inequities in access.

Encouraging uptake of public transport

- 63. We support the improvement of public transport availability to reduce emissions, and support further investment in public transport infrastructure, including working with central government to progress the Public Transport Futures programme and the Mass Rapid Transit Indicative Business Case. Investing in improving public transport services is likely to have a greater impact on growing ridership than reducing fares.
- 64. We strongly support the intent in the first budget period to provide better travel choices in New Zealand's regions and rural areas, including establishing a clear set of principles for planning and funding different kinds of public transport, within and between towns and cities, and improving the way these projects are planned, funded and delivered.
- 65. We note that the lack of an additional source of public transport funding (other than the National Land Transport Fund) is currently the biggest barrier to expanding the frequency and coverage of our public transport networks.

Options for mode shifts in rural and provincial areas

66. We support the provision of better travel choices to NZ's smaller provincial towns and rural areas, including by public transport.

- 67. We note the discussion document specifically mentions the success of the MyWay Timaru ondemand public transport trial and indicates this as a potential model for providing more effective travel choice in smaller rural communities and provincial towns.
- 68. Regional Council staff are currently working with Waka Kotahi to agree to extend the current trial of MyWay until 30 June 2024. Following completion of the trial regional council staff will work with Waka Kotahi to evaluate how on-demand services become part of the region's standard continuous programmes for public transport.
- 69. We also reiterate our recommendation that the Emissions Reduction Plan extend its consideration of rural areas to ensure the right mix of emissions reduction approaches is pursued for rural communities.

Freight and Supply Chain Strategy and New Zealand Rail Plan

- 70. We support the development of a freight and supply chain strategy to look at decarbonisation of freight and ways to encourage greater mode-shift of freight to rail and coastal shipping, as well as address issues around efficiency and competitiveness.
- 71. We support further investment in rail and coastal shipping. However, this should not come at the expense of funding for road maintenance and renewals.
- 72. We note that achieving a 100 per cent increase in rail freight tonnage moved to/from and within Canterbury is one of three headline targets in our 2021-31 RLTP and is backed by our research showing achieving greater mode shift to rail is economically and environmentally astute for the South Island.
- 73. We would welcome greater direction and guidance for the transport sector on how best to plan, fund and deliver on freight mode shift opportunities.
- 74. We look forward to working further with Kiwirail, freight operators and central government to realise freight mode shift opportunities.

New targets for maritime emissions

- 75. Overall, we support the proposed targets for maritime emissions reductions.
- 76. We suggest shifting the dates to 2030 (rather than 2035) to align with International Maritime Organisation targets. New Zealand may also wish to align with the European Union targets, which are tougher.
- 77. Limiting these targets to new vessels does not address emissions from existing fleets, which have a long working life. We would welcome further proposals on how emissions from existing fleets will be addressed.
- 78. Finally, we note that the proposal to work towards net zero-carbon shipping on key trade routes by 2035 is ambiguous and more detail is needed.

Energy sector

79. We note an energy strategy may prompt changes/replacement of the National Policy Standard/National Environmental Standards on Electricity Transmission and National Policy Standard renewable energy. The relationship between an energy strategy and resource management reform needs to be monitored.

80. We support:

- the development of a new combined National Policy Statement and National Environmental Standard, that is clear and directive, to enable us to begin effective reduction of greenhouse gas (GHG) emissions.
- the consideration of short-term effects of GHG emissions from biomass fuel use as this will
 not be captured by the emission factors used in carbon accounting in NZ and also ensuring
 that the emissions from biomass fuel do not exceed WHO guidelines
- further clarification regarding the difference in approach to a physical discharge of greenhouse gases and regulating based on emission factors for carbon accounting.
- 81. We encourage the Government to explore whether biomass is best used to generate electricity or used for process heat, to ensure that WHO guidelines are not breached in this transitional option.

Building sector

- 82. We note that the Government is considering a wide range of measures to reduce emissions from new and existing buildings. Many of the measures exist to some extent in New Zealand and simply need to be expanded or mandated to broaden adoption.
- 83. We also recommend integrating resource management system reform work with the Building Act reform to drive green engineering in building design; solar panels and stormwater collection/use for example. We encourage a push for spatial planning to allow for additional wind generation. Building Act and Building Code reform need to raise standards for emission reductions during construction and in the operation of buildings and to incorporate resilience to extreme weather and rising waters.

Agricultural emissions reduction

- 84. We note that New Zealand's farmers and growers are facing a challenge and opportunity to achieve (and be recognised for) good outcomes across environmental, social and economic dimensions. Emissions mitigation sits alongside stewardship of freshwater, biodiversity, animal welfare and of the farm business itself.
- 85. New Zealand needs a holistic system that supports farmers and growers to take actions that will achieve these outcomes. This includes resourcing for advisory support (and appropriate professional qualifications), compliance mechanisms, guidance, and assurance programmes that are suitable for domestic and overseas markets.

- 86. We note that local government plays a key role in on-farm environmental management. This includes implementing regulation within the resource management system, as well as providing advisory services and other incentives to support better land management practices.
- 87. We therefore recommend that on-farm emissions measurement and management is delivered as part of a broader approach that aligns across existing mechanisms, and that local authorities are included in this work.
- 88. We support increasing delivery of extension services. We emphasise that any direction for farmers and growers to measure and manage their emissions needs to sit firmly and naturally with existing policies and have tools ready to go to back it up.
- 89. We also recommend a single point of decision making and leadership in developing direction on-farm environmental management in general. Most projects are being funded in siloes, for single outcome and a single tool. It is unclear who has the authority to make decisions, both procedural and funding wise, and competing interests are still an issue.
- 90. To this end, we suggest emissions reporting either be part of freshwater farm plans (e.g., as a model more similar to the Environmental Management System plans); or as a separate tool which integrates into the wider eco-system of tools and data sets with catchment context and investment planning tools linking into that. The aim should be to allow farmers to farm and have their farming activities by default generate the required regulatory reporting and planning.
- 91. We note the mention of the rollout of integrated farm planning as decreasing producers' compliance burden. While we agree that integrated farm planning is needed, we want to emphasise that this is a single tool. We recommend developing additional methodology and processes for continuous alignment of the various new initiatives hitting farmers in the coming years.

Reducing waste

- 92. We welcome the attention given to mitigating organic waste. We also recommend including interventions that reduce industrial waste.
- 93. We recommend against large waste-to-energy schemes that rely on long-term waste streams and therefore provide no incentive for waste reduction. For example, to ensure energy from waste plants' long-term security, waste contracts might be required for up to 25 years. Instead, we encourage capture and use of emissions that are relatively unavoidable (landfill gas etc).
- 94. We note farm pits will be difficult to manage, especially if alternative options are not developed. Compliance monitoring and enforcement of these is also likely to be challenging.
- 95. We also suggest banning disposal of waste streams to landfill where a product stewardship scheme has been implemented. We encourage measures that avoid waste wherever possible. Most of the draft plan focuses on end of pipe solutions. Enabling a low waste, low carbon, circular economy will deliver many benefits for our communities.

F-gases

96. We note that the discussion document lays out interventions that focus on limiting F-gases from new refrigeration units. We also recommend interventions that mitigate emissions from New Zealand's existing units – e.g. setting standards for end-of-life disposal.

Determining the role of forestry in the NZ Emissions Trading Scheme (NZ ETS)

- 97. We agree that forestry should be used to provide a buffer if there is a lack in confidence in other sector delivery and the forests are managed sustainably with a heavy focus on wider values in particular biodiversity. Forest carbon stock is easily measurable and will be useful for meeting clear targets.
- 98. We note that New Zealand appears to need exotic forest planting in the short term to meet the emissions targets. This is well explored and is a recommended avenue from the Climate Change Commission. However, the policy settings should transition to favouring native planting, particularly through natural regeneration.

Improving long-term sequestration

- 99. We recommend that the Government encourage continuous cover forest management of all forests, including regenerated or planted native forests, to maintain soil conservation and biodiversity values. Pest management by both private landowners and governments will be central to ensuring that forest sequestration is maintained over time.
- 100. We also support transitioning exotic to indigenous forests for long-term sequestration, if planted in environments suitable for this process to occur under the correct management. This should be research driven. This can be a cost-effective approach through the ETS to meet carbon and biodiversity goals if managed correctly.
- 101. We note that some carbon sinks (e.g., woody vegetation, peatlands, wetlands and some forests) are not eligible for New Zealand Units therefore the carbon stock change cannot be monitored or financially influenced through the ETS mechanism.

Managing forests to achieve positive outcomes and mitigate risks

- 102. We note that in Canterbury there is already significant control of location and scale of exotic forest, e.g., through low use water catchments and Banks Peninsula exotic afforestation restrictions. We want to emphasise the importance of careful selection of where exotic forestry is established as it can cause negative effects such as loss of native biodiversity.
- 103. We suggest that regulation would be useful as currently permanent exotic forests are outside of the National Environmental Standard for Plantation Forestry. Large-scale investors are establishing exotic permanent forests with the intention of transitioning these to native forest with limited professional guidance or knowledge as to how to do this successfully. Central Government should ensure Ministry for Primary Industries has significant focus in the research and development of transitioning to exotic to native forestry as this will come with significant risks if not managed correctly. We recommend adding a permanent forest section into the

- National Environmental Standard for Plantation Forestry that builds on research and development in this space from Ministry for Primary Industries.
- 104. We recommend that investigating options to manage the environmental effects of forests should include national direction to support fire hazard management, as climate change effects will make fires more likely and more extreme.
- 105. We suggest that there is also an opportunity for DOC /LINZ to look at the conservation estate and assess whether there is land that they cannot afford to manage that could be leased for forestry purposes. This must focus on the right tree in the right place, and not exacerbate wilding risk or dry up water short catchments.

Establishing sustainable land-use models, including native afforestation

- 106. We recommend that the government helps to support native afforestation by modifying the forestry ETS to:
 - recognise the additional benefits (e.g., biodiversity) that native afforestation provides, in comparison to exotic afforestation.
 - remove the hurdles involved in registering naturally regenerating native forest.
 - reduce/write off costs for native forests.
 - make this land use decision low risk for investors or land managers. Currently the process is tedious and high risk which is seeing landowners clear this land and replant with exotic crops.
- 107. We support the retirement of marginal farmland to allow natural regeneration of native ecosystems. This would be supported by finding other means to incentivise this process. Currently, landowners with regenerating native forest are not highly valued or eligible within the ETS and therefore can be pressured to clear and plant with often exotic forestry to make financial requirements work.

Conclusion

- 108. Thank you once again for the opportunity to make a submission on this consultation document.
- 109. In summary, the CMF and RTC consider the release of this discussion document a significant step on the pathway towards achieving New Zealand's climate goals. We do, however, strongly recommend that more detail be provided on the interventions that will be put in place, how they will be funded, and how various policy frameworks will be aligned to achieve climate objectives.
- 110. We would like to conclude by reiterating our earlier comments that local government plays a major role in New Zealand communities' transition to a low-emissions and climate resilient future. A strong and enduring partnership approach with local government to support development and implementation of the Emissions Reduction Plan is clearly required going forward.

111. Our secretariats are available to provide any further information or answer any questions the Ministry may have about our submission. Contact details are: Maree McNeilly, Canterbury Mayoral Forum Secretariat, secretariat@canterburymayors.org.nz, 027 381 8924 and Luke Carey, Regional Transport Committee Secretariat, Luke.Carey@ecan.govt.nz. 027 280 6318.

Ngā mihi

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