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Climate Change Commission
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Canterbury Mayoral Forum Submission: 2023 draft advice to inform the strategic direction of the Government's second emissions reduction plan

1. The Canterbury Mayoral Forum thanks the Climate Change Commission for the opportunity to comment on its 2023 draft advice to inform the strategic direction of the Government's second emissions reduction plan.

Background and context

2. The Canterbury Mayoral Forum comprises the mayors of the ten territorial 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.
3. The eleven Canterbury councils are: Kaikōura, Hurunui, Waimakariri, Selwyn, Ashburton, Timaru, Mackenzie, Waimate and Waitaki District Councils, the Christchurch City Council and Environment Canterbury.
4. In this submission, the Canterbury Mayoral Forum provides feedback on areas of general agreement across Canterbury councils on the Commission's advice.
5. We are aware that some Canterbury councils are making more detailed individual submissions and we ask that the Commission carefully consider each of these.

Mayors standing together for Canterbury.

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Climate change mitigation and adaptation collaboration in Waitaha/Canterbury

6. The Canterbury Mayoral Forum recognises climate change as the biggest challenge of our time. In our recently released Plan for Canterbury 2023-25¹, we highlighted climate change mitigation and adaptation as one of our three priority areas, alongside sustainable management of our environment and shared prosperity.
7. As a key priority area, the Mayoral Forum is committed to reducing our carbon footprint, working together on climate action planning, building community resilience, and making our infrastructure as strong as it can be.

Climate action planning

8. In 2022, the Canterbury Mayoral Forum published the Canterbury Climate Change Risk Assessment². This was a technical risk assessment that identified the range of risks to Canterbury from climate change. These risks include sea level rise, higher risk of wildfires, increased drought potential, more extreme weather events, fewer snow days across the region, and maximum daytime temperatures will be 2-5 degrees warmer (with alpine and subalpine regions 5-6 degrees warmer).
9. Following the release of the risk assessment, the Forum has begun developing a Canterbury Climate Partnership Plan to take action on climate impacts across the region. Work has commenced at the governance level to agree a collaborative vision for the partnership plan. This will be followed by prioritised climate actions, and the development of a funding plan laying out an aligned approach across Canterbury for accessing finance for climate actions.
10. While the partnership plan will take some time to complete, the intention is to ensure a regionally aligned approach to climate action planning in individual councils' 2024-34 Long-Term Plans.

Emissions reductions

11. As well as adaptation planning, there are a range of regional and subregional initiatives under way across Canterbury to reduce emissions. For example:
 - the Mayoral Forum supports and encourages all Canterbury councils to undertake carbon footprint assessments. There is a staff-level working group set up with representatives from each council to support and learn from each other on undertaking these assessments
 - the Mayoral Forum supports the Regional Transport Committee's target of a 30 percent reduction in greenhouse gas emissions from land transport in Canterbury by 2030. Regional initiatives to support this include:

¹ <https://www.canterburymayors.org.nz/forums/plan-for-canterbury-2023-2025/>

² <https://www.canterburymayors.org.nz/canterbury-climate-change-risk-assessment-feb-2022/>

- Timaru's MyWay on-demand public transport system
 - improving our existing Greater Christchurch public transport system through the delivery of the Public Transport Futures Programme (this includes better bus frequency and reliability, readily accessible real-time information, a fully electric bus fleet and more bus shelters and bus priority lanes)
 - Whakawhanake Kāinga Komiti's (Urban Growth Partnership for Greater Christchurch) investigation into a mass rapid transit system
 - decarbonisation of the bus fleet
 - piloting the national ticketing solution for public transport in 2024
 - community vehicle trusts in some rural areas
 - increasing the number of cycleways in Greater Christchurch.
- the current Canterbury Regional Land Transport Plan has a headline target of 100% increase in tonnage of freight moved by rail in Canterbury. The Mayoral Forum supports the RTC's policies to collaborate and coordinate planning to prioritise investment to optimise freight mode shift and support investment to provide a resilient freight network.

Climate change awareness campaign

12. To support the region to have well-informed conversations on climate change, in 2021 the Canterbury Mayoral Forum launched the *It's time, Canterbury* climate change campaign. The campaign is designed to help communities understand and prepare for the impacts of change. All 11 of Canterbury's councils play an active part in supporting this initiative.
13. The website <https://itstimecanterbury.co.nz/> is home to reputable information and resources on the topic of climate change, information on how climate change will affect the region, and climate action news from around the region.
14. While some these initiatives are about adaptation and awareness, we wish to highlight them here for the Commission's context when reading our submission points below.

Advancing Iwi/Māori climate change leadership

15. We support the statement in the draft advice that pathways that consider the Crown-Māori relationship, te ao Māori, and specific effects for Iwi and Māori will lead to more enduring and equitable outcomes.
16. We therefore support recommendations 4 and 5. Canterbury councils and local rūnanga invest considerable time and effort in building and maintaining genuine partnerships and look forward to deepening the partnership in tackling emissions reductions. Ensuring Iwi are appropriately resourced to engage in this work with local and central government is therefore strongly supported.

Gross emissions and the Emissions Trading Scheme

17. The Canterbury Mayoral Forum supports a strengthened focus on gross emissions, and adjustment of the ETS to support this outcome (recommendations 1 – 3). Gross

emissions must be reduced for enduring climate change mitigation, and indicative levels of gross emissions and CO2 removals from forestry out to 2050 must be communicated as soon as possible to guide policy development.

18. The Canterbury Mayoral Forum understands the need for careful consideration of expanding the Emissions Trading Scheme to account for other forms of carbon storage. However, these questions should be considered alongside the opportunity to tackle the biodiversity crisis. We agree that these forms of carbon should not be used to make achieving our targets easier, but we think this can be prevented by the Commission's proposed recommendation to separate gross and forestry emissions in the ETS.

Forestry

19. We strongly support the development of a more integrated approach to the role of forests (recommendation 15) alongside the strengthened focus on gross emissions.
20. We are aware of high rates of afforestation in Canterbury. Under current policy settings, we expect this to continue. Data from the One Billion Trees fund reporting that shows Canterbury receiving the highest funding as at 2021 for new forestry. Most of this is exotic.
21. We strongly agree with Dr Carr's comments in the Chair's Message section of the consultation document that:

"Forests will play an essential role in the transition to a low emissions future, including as a source of biofuel, and the benefits from expanding native forests. However, we need to make sure we cut the amount of greenhouse gases being released, as well as plant more trees. The role of forests in managing emissions needs to be addressed, and with urgency. Under current policies, there is a high risk that relying too heavily on carbon removals from forests will undermine the gross emissions reductions that New Zealand needs to maintain net zero long-lived emissions post-2050".

22. We are concerned about impacts of carbon forestry on outcomes such as terrestrial biodiversity, freshwater quality and quantity, wilding pines, and land instability if the forest is to be harvested.
23. As we noted in our submission on the 2021 draft advice, the Forum is very keen to see climate change initiatives incentivise afforestation that complements the freshwater and biodiversity outcomes that New Zealand seeks to achieve.
24. We reiterate our view here that there needs to be increased consideration of how forestry impacts water/flow sensitive catchments, and whether local authorities are well-placed to protect biodiversity values on scrubland in the face of significant economic drivers to clear this land for plantation forestry. We fear that there remains considerable risk that climate mitigation objectives will incentivise large-scale exotic afforestation.
25. Some communities have raised significant concerns about impacts of increased forestry on the rural economy from a social/economic perspective. Some of these are canvassed within chapter 7 of the draft advice and we urge the Commission to take these seriously. Many rural communities, such as those in the Waitaki District, are quite rightly concerned

that land-use change may impact the availability of sheep and beef farming work, and consider that permanent carbon forestry may not generate enough permanent local jobs to replace it. This could lead to reduced employment opportunities, meaning that families may leave for other areas, which in turn will impact the viability of local businesses, and important community institutions like schools.

Equitable transition

26. We support recommendation 6 to expand the Equitable Transitions Strategy to cover both mitigation and adaptation impacts, and recommendation 7 to address impacts of climate policies using existing support mechanisms.
27. To achieve this successfully, we note that all Government climate change policies, not just the Equitable Transition Strategy, need to include full and thorough regulatory impact assessments to:
 - ensure their impacts are understood
 - identify where support mechanisms are necessary to avoid imposing disproportionate negative impacts on vulnerable groups.
28. We would like to take this opportunity to reiterate comments made on the Commission's draft advice package in 2021 about the transition for rural communities. We are concerned that emissions reduction plans do not currently allow for differences in rural settings, particularly regarding transport and the impacts on land-use change. For example, reducing emissions through increased public transport is almost exclusively an urban solution. In addition, we know that land-use change to forestry will affect employment in rural communities in a far greater way than urban areas. We request the Commission carefully consider the significant range of effects on rural communities in its finalised advice to the Government to ensure the Equitable Transitions Strategy adequately reflects the impacts on these communities.

Agricultural emissions

29. The Canterbury Mayoral Forum supports recommendation 8 and 9. As Canterbury's regional economy is heavily impacted by agricultural emissions policy, we consider it critical that the Government delivers certainty and enables innovative solutions as quickly as possible.
30. In the past we have been critical of proposed emissions actions for the agricultural sector as being too general. We repeat our request that a more concrete and realistic pathway is needed to assist the pastoral sector to achieve the reductions required of it.
31. 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.
32. Greater investment in science, research and innovation is needed to help the pastoral sector manage its challenges and take up new opportunities. We strongly recommend

that the Commission emphasises in its advice that investment in science is required to help identify the potential benefits of diversifying land-use. In the examples of successful on-farm land-use diversification that we are aware of, partnership with a research provider appeared to be a critical component. As the Commission notes, some land-use diversification is likely to be needed to achieve climate goals while minimising impacts on productivity. We view land-use diversification as one example of the applied research and partnership areas that should be invested in within the new research funding options that Government and industry have made available.

Planning and transport

33. The Forum considers there is a disconnect between the transport and urban development funding and planning systems. This is clearly problematic and doesn't lend itself to whole-of-system outcomes like emissions reductions.
34. We support recommendation 10 to implement an integrated planning system that builds larger, higher-density urban areas upward (where form and scale is appropriate). We would like this recommendation to include more direction on how this should be achieved. For example, the second emissions reduction plan period is expected to include the introduction of resource management reform instruments, including the National Planning Framework, regional spatial strategies, and natural and built environment plans. Direction on low-emissions, climate-resilient urban form will need to be reflected in all of these instruments to be realised.
35. The Canterbury Mayoral Forum supports recommendation 13 to prioritise and accelerate renewable electricity generation and distribution. We would like the Commission to make additional recommendations to the Government to:
 - invest in behaviour-change programmes to support the changes that are needed to reduce transport emissions. As the Commission notes, transport infrastructure investment can occur faster than changes to urban form. Behaviour change could be faster still.
 - investigate legislative change to improve accountability in the transport system.
36. We support recommendation 16 to simplify planning and increase funding of integrated transport networks, and recommend some further additions:
 - extend the scope so that integrated transport networks also support decarbonisation of freight.
 - clarify that this funding must include public transport services (operational expenditure) alongside infrastructure (capital expenditure). Research by Environment Canterbury and others has found that frequency and reliability is a prime determinant for most people to choose public transport. This cannot be done without a step change in funding for public transport services.
 - emphasise that the focus for public transport cannot be for mass rapid transit (MRT) alone, but for improvements across the full network. For example, the Greater Christchurch MRT business case indicates that investing in improving our bus-based system across the whole network (base Public Transport Futures) is

estimated to generate at least five times more extra PT trip-demand than a new MRT system.

37. As noted earlier, we are concerned that the current package of actions for transport emissions do not consider rural settings. We agree with the draft advice when it notes that outside of urban centres, private vehicles are often the only available practical mode of transport for medium or long-distance trips.
38. We remain concerned that the focus on tier 1 urban centres is preventing the enabling of shift in other areas. Specific support for these communities will be required to see change in the way in which rural communities travel and enable their goods to get to market.
39. We support recommendations 17 and 18 to scale up charging infrastructure and develop incentives to accelerate the uptake of zero emissions commercial vehicles, including vans, utes, and trucks. A broad, and affordable, range of zero emissions vehicles will be required to enable the decarbonisation of the transport system.
40. We note with interest the comment in the draft advice that there needs to be greater clarity about what local government entities are expected to deliver to support decarbonising transport, given that local government is responsible for a significant portion of the funding for transport infrastructure, and makes funding decisions that shape our towns and cities. We agree with the draft advice that allocating central government funding to achieve needed emissions reductions will be a key challenge and require stronger coordination between central, regional and city/district entities.
41. To that end, one of the key priorities in our Plan for Canterbury is to collaborate with central Government to develop and integrated approach to transport funding, with the goal to increase the level of funding available for Canterbury's transport network. We have a vast network connecting towns, cities and rural areas that is crucial to support supply chains and get our products to market. We know that current funding levels are not sustainable to meet present or future resilience requirements – flooding events in recent years are excellent evidence of this.

Energy and industry

42. A swift and sustained reduction in industrial emissions is needed if New Zealand is to meet the next emissions budget. We support the Government's plan to complete a national energy strategy, and hope that local government will be a part of the process to develop it.
43. We therefore support recommendations 13 to prioritise and accelerate renewable electricity generation build and ensure electricity distribution networks can support growth and variability of demand and supply, and recommendation 14 to pursue more widespread process heat decarbonisation and establish mechanisms for other industrial sectors and processes to decarbonise.

44. We consider that retaining the national gas pipeline infrastructure would seem to be a sensible option for low-emissions gases to maintain resilience in the system and until cleaner, renewable options come on to the network.

45. We strongly support the Commission's comment in the draft advice document that:

"transitional measures need to be put in place to support local government to take proactive climate mitigation and adaptation steps prior to reforms being implemented. To ensure a fast-paced and sustained build of renewable generation and network infrastructure, the Government could also provide clear direction and approaches for balancing and resolving conflicts between system outcomes. It would be particularly beneficial if the Government provided stronger directive language within existing policy instruments to remove barriers to building new renewable generation or re-consenting existing generation in the interim".

46. We urge the Commission to make these points clear in its final advice to the Government.

Finance and asset management

47. We support recommendations 11 and 12 to incentivise retrofits for low-emissions buildings and prohibit new building fossil gas installations where practicable. The Mayoral Forum supports any measures to raise the energy efficiency of buildings.

48. In addition, we recommend that the Commission considers re-stating its previous advice on the first Emissions Reduction Plan to support local government in the funding, financing, and investment decision-making to deliver on emissions budget targets, e.g.:

- guidance and direction (e.g. from the Office of the Auditor-General) on how emissions impacts and budgets should be factored into investment decision-making processes at a local government level, e.g. long-term plans
- standardised assurance schemes to support procurement based on climate impact. Providing a simple, easily accessed way of identifying businesses with genuine climate positive products/services would make it easier for businesses and Council to buy effectively and enhance the quantum of successful climate sensitive purchasing.
- funding products that reduce the cost to both apply for funding and invest, and are easily accessed without repeating exercises in financial compliance.

Conclusion

49. Thank you once again for the opportunity to make a submission on the Commission's 2023 draft advice to inform the strategic direction of the Government's second emissions reduction plan.

50. Our secretariat is available to provide any further information or answer any questions the Commission may have about our submission. Contact details are: Maree McNeilly, Canterbury Mayoral Forum Secretariat, secretariat@canterburymayors.org.nz , 027 381 8924.

Ngā mihi

A handwritten signature in blue ink, appearing to read 'Nigel Bowen', with a small dot at the end of the line.

Nigel Bowen
Mayor, Timaru District
Chair, Canterbury Mayoral Forum