

25 March 2021

Climate Change Commission
PO Box 24448
Wellington 6142

Canterbury Mayoral Forum Submission to the Climate Change Commission's draft advice package to the Government

1. The Canterbury Mayoral Forum (CMF) thanks the Climate Change Commission for the opportunity to submit on the Commission's draft advice package to the Government.
2. The Mayoral Forum would also like to sincerely thank Dr Carr for making himself available to meet with the Mayoral Forum in June 2020, and at a workshop we hosted for councillors across Canterbury in February 2021. On both occasions, these were very informative and valuable discussions about the work of the Commission and the many and varied challenges inherent in managing and responding to climate change issues in New Zealand.
3. In this submission the CMF has provided comment on each of the Commission's consultation questions.

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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Kaikōura District Council • Mackenzie District Council • Selwyn District Council • Timaru District Council
Waimakariri District Council • Waimate District Council • Waitaki District Council*

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 following submission has been developed with input from across Canterbury councils. Our submission focuses on matters of general agreement between the members of the CMF.
7. We note that Environment Canterbury, the Christchurch City Council, and the Waimakariri District Council are also making individual submissions. The CMF supports these submissions.

Mayoral Forum's *Plan for Canterbury*

8. 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.
9. One of the key priorities is climate change mitigation and adaptation. Our work in this area focuses on reducing our carbon footprint, building community resilience and making our infrastructure as strong as it can be.
10. As part of this, in 2019 the Mayoral Forum established a Climate Change Steering Group, 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.

Comment on consultation questions

11. Comments are provided on the set of consultation questions below, using the relevant chapter headings from the draft advice package.

Proposed Emissions Budgets

Are the 7 principles used to guide the advice supported?

12. Yes. The CMF considers the principles set out on pages 29 and 30 are sensible and are supported.

Are the first 3 emissions budgets supported (271, 286, and 223 Mt CO₂e respectively)?

13. Yes. The CMF supports no less than the net and annual average budgets to 2035 as set out in the table on page 31. We note that the Christchurch City Council will advocate for stronger targets in its submission.

Is the breakdown between gross long-lived gasses, biogenic methane, and sequestration supported?

14. Yes, although the CMF understands that converting biogenic methane emissions to CO₂ equivalents does not adequately account for the different properties of these very different gasses, notwithstanding that CO₂ equivalents are used internationally.

Should the offshore mitigation be zero for the first 3 budgets?

15. Yes. The CMF considers the first 3 emissions budgets should focus on domestic emissions.

Should there be cross-party support for emissions budgets?

16. Yes. The CMF notes this was a strong recommendation from both the Parliamentary Commissioner for the Environment, and the Productivity Commission.

Should a climate change appropriation be established?

17. Yes. Coordinated efforts across government to address climate change is supported. Establishing an appropriation vote for climate change by 31 March 2022 is strongly supported by the CMF and Canterbury councils.

Are genuine and enduring partnerships with iwi supported?

18. Yes. Canterbury councils and local rūnanga invest considerable time and effort in building and maintaining genuine and enduring partnerships and look forward to deepening the partnership in tackling emissions reductions.

19. The Mayoral Forum and the Chairs of the ten Canterbury Papatipu Rūnanga have also begun building a closer relationship to work together for the greater wellbeing of Canterbury's people and land.

Are genuine and enduring partnerships with local government supported?

20. The CMF supports the alignment of legislation and policy to enable local government to make effective decisions for climate change mitigation and adaption, including the Local Government Act, the Building Act and Code, national direction under the Resource Management Act (RMA), Land Transport Act and proposed RMA reforms.

21. The progress indicators, to have Central Government outline progress on partnerships with local government by 30 June 2022, are supported, as is the work plan outlining how alignment, milestones and funding will be addressed by 31 December 2022.

Are the processes to incorporate views of all New Zealanders supported?

22. Yes. The CMF particularly supports the idea of an ongoing public forum for climate change to bring forward the views and perspectives of all New Zealanders.

23. The Mayoral Forum notes that Environment Canterbury will soon be launching a region-wide climate change engagement campaign. The campaign's purpose is to encourage a better understanding of the effects of climate change in Canterbury and engage people across the region to be a part of the climate change conversation.

24. Members of our Climate Change Steering Group, and councillors from across the region with an interest in climate change, received a presentation in February on how the campaign was developing. The group was impressed with the collaborative approach taken, as Environment Canterbury has been working with each of the Canterbury councils and Ngāi Tahu to develop it.

25. While Environment Canterbury is leading the campaign development, producing the regional content and managing the advertising campaign, Canterbury councils will be supporting this with local content and knowledge, and managing the campaign in their local areas so it is appropriate for their audiences, including connecting with opportunities like district plan changes, consultations, and community engagement events.
26. The Mayoral Forum suggests all councils should consider utilising this model for similar engagement in their regions.

The Path to 2035

Is the focus on decarbonising sources of long-lived gasses supported?

27. Yes. The CMF notes the pathway over the last 20 years has not put this country on the right track, and to achieve net zero emissions by 2050, the focus on decarbonising long-lived gasses is supported.

Is the focus on new native forests for sequestration supported?

28. Yes. Growing new native forests to create a long-lived source of carbon removal is supported.

Is the overall path to meet the first 3 budgets supported?

29. Yes. The CMF considers the tailwinds scenario is achievable and worth aiming for. Table 3.1 on page 55 of the consultation document sets out the key transitions across the first 3 emissions budgets in a range of key industries which are realistic and achievable.
30. However, it should be made clearer to the community that the proposal to eliminate the use of natural gas for electricity generation, and no new natural gas connections after 2025, does not mean that LPG cannot be used for household and industrial cooking purposes.
31. We also note that the transport path needs to integrate land use and urban form.

The Impacts of Emissions Budgets on New Zealanders

Is the equitable, inclusive and well-planned climate transition supported?

32. Yes. The CMF agrees with the statement 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.
33. With the closure of the Tiwai Point Aluminium Smelter, there needs to be greater certainty that the savings in wholesale electricity prices will be passed on to domestic electricity users, particularly with no new natural gas connections beyond 2025. A more inclusive approach working with communities, and a more holistic view of costs and benefits across government, is suggested. There are currently barriers to an equitable transition with the lack of integration between transport networks and urban form.

Is the package of actions for the transport sector supported?

34. The CMF does not entirely support this. Although there is some discussion on page 85 about the needs of rural communities, the CMF considers that the package of actions for transition in

the transport sector does not sufficiently allow for differences in rural New Zealand and the need for specific support to enable the transition in rural settings.

35. We note that a one-size-fits-all approach does not account for rural and remote communities and on the other hand, the appetite for mode-shift in transport options is significant in urban communities. Public transport is almost exclusively an urban solution.

Direction of Policy in the Emissions Reduction Plan

Is the package of actions for the heat, industry and power sectors supported?

36. The CMF's support for these actions depends on continuing to decarbonise the energy system. 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.
37. Setting a target of 60% renewable energy by 2035 would signal the required emissions reductions across the full energy system.
38. Improving energy efficiency standards for all buildings is supported, provided that this is effected through major amendments to the Building Code. The CMF supports any measures to raise the energy efficiency of buildings.
39. However, we consider that more work needs to be done to understand emissions from wastewater treatment and the options to reduce these.

Is the package of actions for the agriculture sector supported?

40. No. The view of the CMF is that the package of actions for the agriculture sector are too general, and boil down to platitudes about improving on-farm efficiency, development of new technologies, and creating options for alternative farming practices.
41. A more concrete and realistic pathway is required to assist the agriculture sector, if it is to achieve biogenic methane reductions of 10% below 2017 levels by 2030, and between 24% and 47% reductions by 2050.

Is the package of actions for the forestry sector supported?

42. Yes. The CMF particularly supports the observation that although native forests sequester at slower rates than exotic planted forests, permanent native forests continue to remove carbon for hundreds of years.
43. The estimated 1.1 million to 1.4 million hectares of erosion prone land would be ideal for conversion to permanent native forests, not only providing an ongoing carbon sink, but also contributing to the arrest of biodiversity decline, and a huge investment in inter-generational heritage, if accompanied by legal protection for its conservation once established.
44. The CMF would like to take this opportunity to caution against incentivising exotic forestry at a scale that is not in the long-term interests of New Zealand. We are particularly keen that climate change initiatives incentivise afforestation that complements the freshwater and biodiversity outcomes that New Zealand is seeking to achieve.

45. 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 (a term often used that diminishes the importance of the ecological values of dryland, alpine and coastal habitats) in the face of significant economic drivers to clear this land for plantation forestry. There remains considerable risk that climate mitigation objectives incentivise large-scale exotic afforestation, and it's not clear the extent to which this would be in New Zealand's long-term interests – from an environmental, economic and rural community perspective.
46. Given that unanticipated impacts from current carbon farm forestry plantation activities are likely to increase in some parts of Canterbury over the next few years, ensuring that mitigation options are available to councils to deal with any potential negative impacts is important for the protection of our communities and environment.
47. The current consultation on additional proposed amendments to the Climate Change (Forestry Sector) Regulations 2008 are noted.

Is the package of actions for the waste sector supported?

48. Yes. The CMF considers reducing waste emissions through resource recovery from the waste levy revenue, and extending product stewardship schemes, is sensible.
49. A greater emphasis needs to be placed on reducing waste from households and through product stewardship in the first place, rather than the focus on end of life emissions.

Is the package of actions to create a multisector strategy supported?

50. The CMF supports this in principle. However, we note that behavioural change is rarely brought about solely by government programmes. The measures to drive low emissions choices through the ETS are supported, although it is acknowledged that the ETS alone is not the panacea.

Rules for Measuring Progress

Are the rules for measuring progress towards emissions budgets supported?

51. Yes. The CMF supports the Budget Recommendation 5 on page 144.

The Nationally Determined Contribution

Is the assessment of the Nationally Determined Contribution (NDC) supported?

52. Yes. The CMF supports the NDC assessment and recommendations.

Is the form of the NDC, based on IPCC's fifth assessment report, supported?

53. The CMF does not support this. Option 2 on page 161 is the preferred format to incorporate all gas with the split gas domestic target incorporated into the headline target. This better reflects the domestic reality under the Climate Change Response (Zero Carbon) Amendment Act 2019 and leverages more international legitimacy for split gas targets.

Are the recommendations on reporting and meeting the NDC supported?

54. Yes. The CMF considers clear communication for purchasing offshore mitigation post 2035 is vital.

Eventual Reductions in Biogenic Methane

Is the assessment of possible biogenic methane reductions by 2021 supported?

55. The CMF does not support this. We note the Climate Change Response (Zero Carbon) Amendment Act 2019 has methane targets for 2030 and 2050. We therefore consider the biogenic methane reductions in 2100 are too speculative.

Conclusion

56. Thank you once again for the opportunity to make a submission on the Climate Change Commission's draft advice package to the Government.

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

Ngā mihi



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