

31 May 2024

Climate Change Commission  
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Tēnā koutou

## **Canterbury Mayoral Forum Submission on the Climate Change Commission's 2024 consultations on Aotearoa New Zealand's 2050 emissions reduction target and the fourth emissions budget (2036–2040)**

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1. The Canterbury Mayoral Forum thanks the Climate Change Commission (the Commission) for the opportunity to comment on its 2024 consultations on the 2050 emissions reduction target and the fourth emissions budget (2036–2040).
2. This is a significant step on the pathway towards New Zealand's climate goals. We recognise both the enormous undertaking that it entails and the time pressure that the Commission is working to.
3. We also acknowledge the previous commitment that the Commission has shown to genuine consultation, by making the time to engage widely and by providing final advice that reflects the feedback that has been received.

### **Background and context**

4. The Canterbury Mayoral Forum comprises the mayors of the ten territorial authorities in Canterbury and the Chair of the Canterbury Regional Council, 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.
5. The eleven Canterbury councils are: Kaikōura, Hurunui, Waimakariri, Selwyn, Ashburton, Timaru, Mackenzie, Waimate and Waitaki District Councils, the Christchurch City Council and Canterbury Regional Council.

### ***Mayors standing together for Canterbury.***

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6. In this submission, the Canterbury Mayoral Forum provides feedback on areas of general agreement across Canterbury councils on the Commission's advice.
7. We are aware that some Canterbury councils are making more detailed individual submissions and we ask that the Commission carefully consider each of these.

## **Climate change mitigation and adaptation collaboration in Waitaha/Canterbury**

8. The Canterbury Mayoral Forum recognises climate change as one of the biggest challenges of our time. The Plan for Canterbury 2023-2025 highlights climate change mitigation and adaptation as one of our priority areas, alongside sustainable management of our environment and shared prosperity.
9. 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.
10. The Canterbury Mayoral Forum is developing the Canterbury Climate Partnership Plan, which lays out how Canterbury councils intend to work together on specific climate actions to help minimise the impacts of climate change on Canterbury's communities and ecosystems, with a focus on preparing for an equitable and inclusive transition and emissions reduction in the region.

## **Submission points**

### **Aotearoa New Zealand's 2050 emissions target**

#### ***Balancing the existing case for change with the need for durability***

11. The Canterbury Mayoral Forum **supports** the factors that the Climate Change Commission has considered in assessing the case for changing the 2050 legislative target,
  - Global action
  - Technological developments
  - Understanding of climate change
  - Risks associated with emissions reductions and removals
  - NZ's economic/fiscal circumstances
  - NZ's obligations under international agreements
  - Distributional impacts
  - Equity implications
  - Social, cultural, environmental and ecological circumstances.
12. While the Forum recognises changes in some of those areas could provide a case for changing the target, the majority of Canterbury councils **recommend** balancing the existing case for change with the need for durability and certainty of the target.
13. The 2050 legislative target is the foundational direction for meeting New Zealand's commitments under the Paris Agreement. Any change to this target risks reducing its durability over time.

14. The durability of the 2050 target has implications for local government and regional climate action planning, which builds on the legislative target and emissions budgets.
15. Changes to national targets may risk impeding the development of local government efforts to drive emissions reduction outcomes in Canterbury.
16. The majority of Canterbury councils **do not support** a change to the 2050 legislative target (Christchurch City Council supports a strengthened target).
17. The Mayoral Forum **supports** retaining the split-gas target, as this recognises the contribution of different gases while setting the expectation that all sectors play their part.

### **Aotearoa New Zealand's fourth emissions budget (2036-2040)**

#### ***We support the Commission's approach to developing emissions budgets***

18. The Canterbury Mayoral Forum **supports** the proposed approach for the fourth emissions budget that takes new opportunities into account and focuses on gross domestic emissions reductions.
19. The majority of Canterbury councils **support** the proposed fourth emissions budget and demonstration pathway and the recommendation to implement policies that result in a balance of emissions and removals.
20. The Forum recognises the significant co-benefits that could be delivered through enhancing sequestration by indigenous biodiversity.
21. We also support the recommendation for the Government to implement policies that deliver emissions reduction of each greenhouse gas.
22. In particular, we **support** the recommendations to:
  - prioritise domestic emissions mitigation over overseas offsets
  - set gross as well as net emissions targets
  - provide a demonstration pathway that reduces reliance on exotic forestry
  - break the budget down into an individual target for each greenhouse gas.
23. We have previously expressed our concerns to the Commission regarding the impact of high rates of exotic afforestation in Canterbury, as stated in our previous submission on the second Emissions Reduction Plan.
24. The Forum acknowledges that getting the systems in place now to deliver enduring gross emissions reductions is necessary. It will reduce the costs of the transition to a climate-resilient future in the long run, deliver significant co-benefits (as noted by the Commission), and increase the range of options available for future generations.

#### ***Engage directly with Tiriti partners, ensure equity and protect mātauranga***

25. The Canterbury Mayoral Forum **supports** the factors that the Commission has considered in preparing advice on the fourth emissions budget and demonstration pathway, including factors that we have previously highlighted as important, e.g.:

- the broader social impact of transition pathways, especially for those in disadvantaged socio-economic groups, and the implications for the feasibility of the approach
- unique impacts for iwi/Māori and Māori land
- disproportionate impacts of climate change and climate change policy for iwi/Māori.

26. In addition, when assessing the impacts of the fourth emissions budget and demonstration pathway, **we recommend** that the Commission considers the extent to which mana whenua are likely to be enabled to exercise mana motuhake, rangatiratanga and kaitiakitanga. We note that this does not discharge government from its responsibilities to all of its citizens or its obligations under te Tiriti.

27. We also caution that when considering perspectives from mātauranga Māori, it is appropriate that this should be directly driven by mana whenua / mana moana. To support this, we recommend clear protection mechanisms (guidance, policy and legislation) to ensure that the ownership, intellectual property and integrity of that mātauranga remains with mana whenua.

***We support the inclusion of international shipping and aviation***

28. We agree that international shipping and aviation should be included in our national emissions reduction targets. This increases transparency and is in line with our major trading partners in the United States, United Kingdom and Europe.

***The feasibility and impacts of the budget and targets in Canterbury depend on the actions taken to achieve them***

29. We support the Commission's advice that the fourth budget and the 2050 target provide an opportunity for a successful and equitable transition to climate resilience, along with significant economic, cultural, environmental, and social co-benefits.

30. We also note that the feasibility and impacts of the budget and target, in Canterbury as well as New Zealand, greatly depend on the actions that are taken to achieve them.

31. For example, Canterbury as a region has relatively large opportunities to reduce transport emissions. Doing so requires significant investment in public transport, and changes to the fleet, travel demand, and energy supply, in a way that is different from the current approach to transport planning and funding.

32. Agricultural emissions reduction brings relatively significant opportunities, and risks, to Canterbury's regional economy. Responding successfully depends on the rollout of methane inhibitors and other approaches that are well-suited to Canterbury's farming systems.

33. In Canterbury, there are opportunities for strong partnership with Ngāi Tahu to deliver successful and equitable transition pathways. Te Rūnanga o Ngāi Tahu released its Climate Change Strategy *He Rautaki Mō Te Huringa o te Āhuarangi* in 2018 and launched its Climate Change Action Plan *Te Kounga Paparangi* in 2022. Many papatipu rūnanga in the takiwā are already well underway with climate action plans, including with broader communities.

34. Canterbury's opportunities for emissions mitigation through afforestation also bring significant risks and issues that require careful work to resolve. This includes the need to enable and incentivise viable pathways to establish and transition to indigenous forestry, including on Māori land.

35. The Canterbury Mayoral Forum also views equity to be essential. We have previously recommended that all climate change policies, in addition to the Equitable Transition Strategy, include regulatory impact assessments to identify the full range of impacts, and avoid these impacts falling to the most vulnerable groups in our communities.
36. We expect these matters to be addressed within future strategies, plans, and policies on achieving the budgets and legislative target, including future emissions reduction plans.

Nāku iti noa, nā

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

Nigel Bowen  
Chair Canterbury Mayoral Forum  
Mayor Timaru District Council