



## Submission of Civic Trust Auckland

### **The Climate Change Commission's draft advice to government**

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### **Introduction**

Civic Trust Auckland (CTA) is a non-profit public interest group, incorporated in 1968, with activities and interests throughout the greater Auckland region.

The aims of the Trust include:

- a) To promote the recognition and protection of the heritage value of sites, buildings, places or areas.
- b) To promote the maintenance and enhancement of amenity values and the quality of the environment.
- c) To acknowledge the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taongas,
- d) To promote and stimulate public interest in the environment and to improve standards of architecture, town planning and urban design.

Our submissions have included some to central government on matters that affect the country as a whole, such as RMA reforms.

CTA is included on Auckland Council's list of regional stakeholders. We have been making submissions to Auckland Council for 50 years on issues relevant to climate change, including, on 14 March 2014, Council's *Proposed Low Carbon Strategic Action Plan* and on 30 September 2019, Council's *Climate Change Framework*. Those submissions can be viewed [here](#) and [here](#), respectively.

We thank the Climate Change Commission for its work on this urgent matter of global concern. We have read the consultation document *2021 Draft Advice for Consultation*. The page numbers we quote refer to the *2021 Draft Advice for Consultation*. Reference to "the Commission" means the Climate Change Commission.

## Six Big Issues

**The pace of change** Big issues question 1. Do you agree that the emissions budgets we have proposed would put Aotearoa on course to meet the 2050 emissions targets?

Strongly agree - Agree - Neutral - Disagree - Strongly disagree - **Do not know**

1. Climate change is a global emergency. Rapid reduction of all greenhouse gases is essential.

2. The costs of inaction on climate change are very high.

3. CTA recognises that the emissions budgets call for big changes and include specific recommendations. However, the draft advice, particularly in chapter 3, raises uncertainty about meeting the 2050 emissions targets. The emissions budgets would set Aotearoa on course but we do not know how soon we will get there. Therefore, our government should aim for the most ambitious budgets and there should be action on all fronts addressed in the report, as a matter of urgency.

4. As the Chair of the Climate Change Commission states in his letter on page 4, “the time for accelerated climate action is now.” Page 11 of the draft advice states that “we need strong and decisive action to address climate change.” This view is reflected in the responses to the draft advice by many individuals and groups that have concerns about climate change.

5. The Intergovernmental Panel on Climate Change’s 1.5 degree report outlines that for a 66% chance of averting climate catastrophe, we must approach emissions reductions with deep cuts in emissions, starting immediately.

6. If our current 2030 target under the Paris Agreement will not result in our country making a contribution to limit warming to 1.5C, then we need to be more ambitious.

7. Transitioning to a low-carbon future must be seen as a responsibility of industry, and those that have already done work towards this goal should be commended and used as examples for others, both within Aotearoa and offshore.

8. In CTA’s view, the budgets should result in emissions reductions as fast as possible, doing as much as we can, as soon as we can, and making a useful contribution to global efforts by example and by actual reductions.

9. Aucklanders have proved that they are able to save water during times of a water shortage. Thousands throughout the country have marched, signed petitions and joined activist groups to advocate for action on climate change. Millions of us have complied with the government’s instructions during the various COVID-19 lockdowns. Citizens of Aotearoa were educated in the 1960s about litter with the Be a Tidy Kiwi campaign (which last year launched a new website focused on recycling and waste <https://beatidykiwi.nz> ) People *can* be educated about climate change and have and will change their behaviour.

10. There is a huge youth movement in our country that is concerned about climate change. There is a huge worldwide concern about climate change. People are very willing to act on climate change.

11. The longer we wait, the more difficult this urgent task will be.

**Future generations** Big issues question 2. Do you agree we have struck a fair balance between requiring the current generation to take action, and leaving future generations to do more work to meet the 2050 target and beyond?

Strongly agree - Agree - Neutral - **Disagree** - Strongly disagree - Do not know

1. The current generations should do as much as they can, as soon as they can to take action on climate change, and minimise passing the problems to future generations – who already have an ever increasing portfolio of serious problems to deal with. The younger generations have already appealed to the older generations (who currently hold the power) to act. For example, on 27 September 2019, 10,000 school students marched in Wellington, appealing to the government to act on climate change.

2. CTA shares the frustration of the younger generations throughout the world, many of whom are very familiar with and knowledgeable about the climate change issue, and millions of whom joined in the school climate strikes, FridaysForFuture, started in August 2018 by Greta Thunberg. There has been a strong plea from the young people of Aotearoa to treat the situation seriously, that we need bold action and we need it now. Some of Aotearoa's school students have expressed that the only way they felt they could bring about the necessary change was to stand for election to government, and, since the school climate strikes in Aotearoa, several of them have done so, with some success.

3. Our government should act as soon as it can to put in place the systems, structures, and policies to reduce emissions. At the same time, this work would also help address other challenges for future generations, such as affordable, energy-efficient homes.

**Our contribution** Big issues 3. Do you agree with the changes we have suggested to make the NDC compatible with the 1.5°C goal?

Strongly agree - Agree - Neutral - Disagree (our changes are too ambitious)- **Disagree (our changes are not ambitious enough)** - Do not know

1. CTA is of the view that our government should be very ambitious as regards the suggested changes. As a developed country, we have a responsibility to act quickly and ambitiously and contribute meaningfully to the global effort. Our efforts should reflect our economic status, ability to take action, and high historical and current per capita emissions.

2. In Aotearoa, there is much potential for more low emissions renewable electricity like wind and solar, and this can be used to power industry and transport.

3. We should support countries in the Pacific to both lower their emissions and cope with the impacts of climate change.

4. We support focusing on reducing emissions within Aotearoa, rather than buying offshore carbon credits. The government should focus on creating local jobs in green industries.

## Role and type of forest

Big issues 4. Do you agree with our approach to meet the 2050 target that prioritises growing new native forests to provide a long-term store of carbon?

Strongly agree - Agree - Neutral - **Disagree** - Strongly disagree - Do not know

1. CTA agrees with the draft advice (page 12) that, “As a country we can no longer rely on forests to meet our climate change targets.”
2. We see growing new native forests (and looking after the ones we have) as one of the actions our country should take but we don't see it as a priority. We are not sure that we can predict the health of our forests or their safety from forest fires in the future. We also note that once a forest reaches maturity and older trees die, they release carbon dioxide as they decompose. Furthermore, a lot of land is needed for forestry.
3. Reducing emissions now and into the future should be the priority.
4. Therefore, planting new native forests should be included in Aotearoa's climate actions, and existing native forests also need to be protected, by means of fencing, and weed and pest control (particularly of opossums).
5. Other native planting should also be carried out, such as tussocks, wetlands and mangroves, along with protection of such areas. We note that the Paris Agreement in its preamble recognises “the importance of the conservation and enhancement, as appropriate, of sinks and reservoirs of the greenhouse gases referred to in the Convention” and “the importance of ensuring the integrity of all ecosystems, including oceans, and the protection of biodiversity.” These areas include biomass, forests, oceans and other terrestrial, coastal and marine ecosystems.
6. As per other co-benefits of climate change action, as the draft advice notes on page 123 that, “Native forests also offer other benefits, such as long-term erosion control, improved biodiversity and recreational benefits.”
7. There could be more incentives for people to plant native forests and perhaps these places could charge an entrance fee/ask for a koha if they are suitable for tourism and entertainment purposes. Perhaps members of the public and schools could be allocated their own “allotments” within native forest areas, where they can plant, nurture and monitor native species.
8. Aotearoa has a labour force, including those currently unemployed or needing new employment in a green economy) who could carry out planting and pest control
9. We note that urban trees on private land, either singly or in groups, and trees in both small and large parks, help reduce emissions, cool urban temperatures, and improve people's quality of life.
10. CTA agrees there should be a focus on natives but we suggest exotics should be planted as well. It is not known how well certain tree species will do in the future, and some of our native species (e.g., kauri and pohutukawa) are suffering from diseases and may be more vulnerable to additional diseases, as well as pests, as temperatures rise. A variety of tree species, both native and exotic, both fast-growing

and slow-growing, would seem to be a sensible approach, using natural regeneration, wherever possible.

11. Aside from planting more trees, we need to look after the ones we have, including the 2,500 exotic trees on Auckland maunga currently under threat from the Tūpuna Maunga Authority. Mature exotic trees also have a part to play in carbon removal and need protection.

12. CTA supports the return of general tree protection. We note that one third of Auckland's tree canopy has been lost since general tree protection was removed in 2012. Each mature tree has much value in terms of climate change – as well as multiple other benefits, including improving biodiversity, which is also currently undergoing a crisis, and erosion control.

13. As per the suggestion on page 10 of the draft advice, work is needed to better understand the potential of existing forests, small blocks of trees, soils and wetlands to store more carbon.

**Policy priorities to reduce emissions** Big issues 5. What are the most urgent policy interventions needed to help meet our emissions budgets? (Select all that apply)

**Action to address barriers - Pricing to influence investments and choices - Investment to spur innovation and system transformation - None of them**

1. All these policy interventions are important and the resulting actions can, at the same time, address other pressing issues such as poverty, lack of housing, pollution, traffic congestion and the biodiversity crisis.

2. Policy interventions are needed in every sector to meet the emissions budgets. The sectors that cause the most emissions are the ones where the most urgent policy interventions are needed, namely, agriculture, transport, and energy. Clean energy and clean transport options are available now. Agriculture emissions add up to almost half of Aotearoa's emissions so urgent action is needed in this sector.

3. We note that the draft advice on page 118 states: "The complexity of the retail electricity market can also disincentivise consumers from making changes that could save them money and reduce emissions." CTA would like the Commission to advise the government to simplify the retail electricity market and make consumers aware of which energy providers are using renewable energy sources.

4. We note that residential electricity prices have gone up 90% since 1986, while industrial prices have not changed much and commercial prices have fallen 25%.

5. The Electricity Authority needs the ability to look after the interests of residential consumers.

6. Ending the use of coal and gas for industry should be a priority, with the government supporting more generation of power by solar, wind and geothermal.

7. The Commission's draft advice includes \$190 million per year to be spent on decarbonisation between now and 2025 (page 89). We suggest that money could also be diverted from non-climate friendly projects towards decarbonisation.

8. The Commission should encourage government investment in sustainable start-ups and private sector innovation, clean energy innovation, and retraining for jobs in clean energy. People who lose jobs in the coal mining, oil and gas sectors can be retrained in building (we are in dire need of more houses), repair of appliances, replacement of internal combustion engines with electric engines, and, as the draft advice states on page 97, using wood waste for biofuels, and new industries, such as hydrogen, energy efficiency and home energy audits, advisory services for managing emissions on farm, and on deploying and supporting new technologies.

**Technology and behaviour change** Big issues 6. Do you think our proposed emissions budgets and path to 2035 are both ambitious and achievable considering the potential for future behaviour and technology changes in the next 15 years?

Strongly agree - Agree - **Neutral** - Disagree - Strongly disagree - Do not know

CTA is of the view that the proposals are achievable but are not ambitious enough.

1. There could be even more renewable generation of energy, learning from what other countries do and funding research into modes such as wave energy from the sea, whether this research is based in Aotearoa or not. According to the European Commission, sea waves have a great potential as renewable energy source – and Aotearoa is surrounded by sea. Wave energy technology is a field in continuous development, but is not yet competitive with the other renewables. This was the situation with solar and with electric cars some years ago.
2. We do not support industry and manufacturing that is not green (such as cement, steel and iron) being moved offshore – to create problems in other countries – rather, these industries need to adopt green technology, such as zero-emissions steel production. We could import products from low emissions manufacturing plants overseas, as suggested on page 117.
3. We need better recycling technologies in Aotearoa, alongside manufacturers creating less waste to begin with.
4. Schools could play a part in producing energy and reducing waste, and educating the rest of the population.

**Consultation question 1. Do you support the principles we have used to guide our analysis?**

Fully support - **Partially support** - Neutral - Do not support - Do not know

Principle 1: Aotearoa needs to align with the 2050 targets (and is required to do so) but should go faster and further.

Principle 2: Decarbonising the economy is very important, but again, we should go faster and further. We question whether the 100% renewable electricity target should be merely aspirational (page 11), and encourage our government to look at what other countries have achieved and how.

Principle 3: Options for meeting the targets are important, as is the ability to adjust course as the transition proceeds. This needs to be balanced with taking advantage of windows of opportunity and moving at a rapid pace. We would also question

whether the Commission has considered ALL available options, as it states on page 56. We note there is very little mention of other countries in the draft advice, what they have been doing regards climate change and how. As is stated on page 75: “More and more countries are strengthening their international climate change commitments, particularly in the lead up to the next international climate change conference in 2021,” and the following countries are mentioned with regard to moving to more ambitious emissions targets: China, Japan, South Korea and the UK. There is presumably opportunity to learn from these countries, as well as others.

Principle 4: Avoiding unnecessary cost by “using measures with lower costs and planning ahead so that technologies, assets and infrastructure can be replaced with low emissions choices on as natural a cycle as possible” (page 31) needs to be balanced with the cost if we do not act. We also note that there is much emphasis on introducing EVs but little mention of what to do about vehicles already in the country that use the internal combustion engine. (See our comment on this under Consultation Question 14.)

Principle 5: Transitioning in an equitable and inclusive way is important and we think that there are models in Aotearoa (and elsewhere) where this has already happened which can provide guidance. “Replacement” of assets should not entail a lot more waste going to landfill. There should be government support for repurposing such assets. We suggest the government also needs to take into account the effect of COVID-19 has had on business, in that businesses will need extra support to face yet another challenge.

Principle 6: Increasing resilience to climate impacts: Although this is stated as a principle, we did not see much in the draft advice related to impacts that have already occurred.

Principle 7: We see co-benefits as very important. As the Commission and many submitters have observed, co-benefits to reducing emissions include better human health and productivity, increased biodiversity, better housing, better air quality, cleaner water, savings in energy use, less traffic congestion, quieter and more pleasant streets and more active local travel. Concurrent with the climate change crisis, we also have a biodiversity crisis and an obesity crisis, the latter which has been described by the WHO as one of the world’s “most neglected public health problems,” adding that “If immediate action is not taken, millions will suffer from an array of serious health disorders ... Its health consequences range from increased risk of premature death to serious chronic conditions that reduce the overall quality of life.” (See <https://www.who.int/activities/controlling-the-global-obesity-epidemic>)

CTA is of the view that the main principle guiding the government’s action should be urgency.

**Consultation question 2. Do you support budget recommendation 1? Is there anything we should change and why?**

Too ambitious About right **Not ambitious enough** Don't know

CTA does not think the levels set for budget recommendation 1 are ambitious enough. Our country needs to move faster. With already existing technology and solutions (including those being used by other countries) we can have much more ambitious emissions budgets and stronger policy recommendations.

**Consultation question 3. Do you support our proposed break down of emissions budgets between gross long-lived gases, biogenic methane and carbon removals from forestry? Is there anything we should change, and why?**

Too ambitious About right Not ambitious enough **Don't know** Gross long-lived gases  
Biogenic methane Forestry

We do not have the knowledge to comment on the proportions but we do think the focus should be on long-lived gases. Also, we think the budgets should be as ambitious as possible.

**Consultation question 4. Do you support budget recommendation 4? Is there anything we should change, and why?**

Fully support - **Partially support** - Neutral - Do not support - Do not know

We support using offshore mitigation only as a last resort for emissions budgets. However, this should not stop us helping other countries with meeting their emission reduction targets.

**Consultation question 5. Do you support enabling recommendation 1 on cross-party support for emissions budgets? Is there anything we should change and why?**

**Fully support** - Partially support - Neutral - Do not support - Do not know

We support cross-party working together as much as possible on all climate change matters, and, in fact, all other matters as well. Furthermore, we support cross-governmental support, in other words, learning from other countries, e.g. Bhutan, a carbon negative country (see <https://edition.cnn.com/2018/10/11/asia/bhutan-carbon-negative/index.html>); Denmark, which has sustainability practices we could adopt (see <https://denmark.dk/innovation-and-design/sustainability>); France, which has introduced repairability scores into legislation (see [https://www.insidehook.com/daily\\_brief/tech/france-repair-law-tech](https://www.insidehook.com/daily_brief/tech/france-repair-law-tech)); and Ireland, where 10% of the transport budget is allocated to pedestrian infrastructure and a further 10% for cycling (see <https://www.gov.ie/en/publication/7e05d-programme-for-government-our-shared-future/>). There is undoubtedly a wealth of knowledge and skills being accumulated throughout the world, climate change being a global problem. Countries have been able to cooperate and learn from each other during the COVID-19 pandemic, another global crisis, and this should be the same for climate change.

**Consultation question 6. Do you support enabling recommendation 2 on coordinating efforts to address climate change across Government? Is there anything we should change and why?**

**Fully support** - Partially support - Neutral - Do not support - Do not know

1. Our government should move much faster than currently and than the Commission recommends. All regulatory and policy frameworks should be aligned with low



emissions and climate resilience objectives, and this should apply to local government as well. With regard to any new legislation, the public should be invited to give input. In relation to the upcoming repeal of the Resource Management Act and its replacement with three pieces of legislation which will deal with the related fields of development, the environment and climate change, any consideration of and implementation of policy in relation to climate change should be contemplated in the context of those forthcoming legislative changes and the need to achieve outcomes that are fair and reasonable on an inter-generational basis.

2. CTA is aware that policy can include aspirations which are not translated into action, for example, our Council (Auckland) has stated aspirations for planting more trees, but it has not managed to protect thousands of trees that developers have wished to remove, and it has expressed aspirations for protecting heritage buildings but has not managed to protect many buildings from being destroyed or modified by developers. Auditing/monitoring of policy in relation to action (or inaction) on climate change could be put in place.

3. We also note that less than 0.5% of the Auckland Council's long-term plan budget is dedicated to climate change efforts.

4. We were disturbed to read in the Commission's report (page 128) that across government, ministries and agencies do not prioritise climate change considerations. In our view, climate change should inform every decision made at every government level, both local and central.

**Consultation question 7. Do you support enabling recommendation 3 on creating a genuine, active and enduring partnership with iwi/Māori? Is there anything we should change and why?**

**Fully support** - Partially support - Neutral - Do not support

Such partnership is enshrined in the Treaty of Waitangi.

**Consultation question 8. Do you support enabling recommendation 4 on central and local government working in partnership? Is there anything we should change and why?**

**Fully support** - Partially support - Neutral - Do not support

1. It would seem very strange not to work in partnership. All policies and actions at all levels of government should have climate change inform them. We take this opportunity to repeat our suggestion that inter-governmental exchange of information and support should be taking place with many other countries.

2. The government has its Genless website and our council (Auckland) has its Live Lightly site. These and other such forums around the country could inform each other.

**Consultation question 9. Do you support enabling recommendation 5 on establishing processes for incorporating the views of all New Zealanders? Is there anything we should change and why?**

**Fully support** - Partially support - Neutral - Do not support - Do not know

1. When consulting next time, please make provision for “any further comments,” and if there is a word limit, in any consultation, please explain why. (We sent a query to [hello@climatecommission.govt.nz](mailto:hello@climatecommission.govt.nz) several days ago with regard to the word limit but have not received a reply).

2. We strongly support the Commission’s recommendation for funding and establishing an ongoing public forum for climate change to bring forward the views and perspectives of all New Zealanders. This would enable debate, education, sharing of ideas and could be provided for at both a local and a national level. Relevant information could also be made available at libraries and local board offices and in Councils’ electronic publications.

3. Many New Zealanders have been expressing their views on climate change to the government for decades, so the government enabling a forum for this would be much appreciated. This could be an online forum but should also include offline opportunities for those who are not able or willing to use online forums. It should not be restrictive, for example, only accessible to those who use Facebook.

**Consultation question 10. Do you support our approach to focus on decarbonising sources of long-lived gas emissions where possible? Is there anything we should change and why?**

Fully support - **Partially support** - Neutral - Do not support - Do not know

1. CTA supports this approach and encourages faster uptake. We note that there are available technologies that can be widely used to reduce or completely avoid gross emissions and would like to see this happen faster.

2. CTA supports the ban on new coal boilers and banning new and expanded coal mines in Aotearoa, and an end date for all coal mining, including coal mining for export. We are of the view that the phase-out date for fossil fuel heating in new buildings should be brought forward to 2022 and that burning coal should finish in 2027, not 2037 as proposed, with a transition to renewables, not gas.

3. Emissions from international aviation and shipping should be considered in the approach to decarbonisation, including looking through the lens of buying locally and using wind power to travel. We wonder if the Commission has taken into account the reduction in flying and shipping that has resulted due to the COVID-19 pandemic and the changes in behaviour that resulted, such as online meeting and working from home. We encourage the Commission to advise the government to support meeting online instead of face-to-face for at least some of the time, at all levels of society.

**Consultation question 11. Do you support our approach to focus on growing new native forests to create a long-lived source of carbon removals? Is there anything we should change and why?**

Fully support - **Partially support** - Neutral - Do not support - Do not know

1. Mature exotic trees also have a part to play in carbon removal (and have already) and need our protection. As stated earlier, and which we would like to strongly reinforce, CTA supports the return of general tree protection.

2. We also suggest that rates relief be provided for individuals who are willing to nurture pre-1990 native forests on their own land.
3. (Please also refer to our response to big issue 4: **Role and type of forest.**)

**Consultation question 12. Do you support the overall path that we have proposed to meet the first three budgets? Is there anything we should change and why?**

Fully support - **Partially support** - Neutral - Do not support - Do not know

1. Aotearoa should work to reducing emissions as fast as possible. The word “emergency” started being publicly used to describe the climate change situation several years ago (e.g., Auckland and Wellington Councils declared a climate emergency in June 2019). Some individuals, groups, businesses and governments have been addressing climate change in their own way for decades. We understand that it was a youth climate action group in 2011 that started drafting legislation for a Zero Carbon Act. Various campaigns have been working hard to encourage the New Zealand Government to make changes, such as those of Greenpeace, the Transition Town Movement (founded 2007), the Campaign for Better Transport, 350 Aotearoa, ECO (Environment & Conservation Organisations of Aotearoa New Zealand), the Environmental Defence Society, the Coal Action Network and Extinction Rebellion. However, little change is apparent in the city where CTA is based (Auckland), and, it seems, the country as a whole. We think there is more of a danger in moving too slowly than moving too quickly.
2. Many members of the public are ready for behaviour change and many have made changes already. We are keen to see action from the government.
3. As the draft review states (page 21), “our communities know what actions need to be taken to benefit or empower them.”

**Consultation question 13. Do you support the package of recommendations and actions we have proposed to increase the likelihood of an equitable, inclusive and well-planned climate transition? Is there anything we should change, and why?**

Fully support - **Partially support** - Neutral - Do not support - Do not know

1. We need better climate education so that each sector has the knowledge and the confidence to move to more sustainable practises. For example, CTA is aware of a group in Aotearoa whose members question whether climate change is real and are concerned that the government is planning to end all agriculture.
2. New Zealand should provide financial support for Pacific Island countries to cope with and adapt to climate change. This would have the co-benefit of going some way to meeting the commitment our country made some years ago (as did others) to contribute 0.7% of our gross national income in official development assistance.
3. Regarding the development of “policies for creating a workforce with the skills needed for accelerating the low emissions transition” (page 105), we should make use of the knowledge of business/industry that has already made this shift, both in

Aotearoa and overseas, as well as the knowledge and skills of the Transition Town movement.

4. Regarding behaviour change, the government could promote “Climate Change Champions” throughout the country. Many of these people could be young people, including those school students who participate in the climate change marches. They would educate the public about behavioural change, lead by example, and tell positive stories about change in Aotearoa and elsewhere. They could be given the opportunity to work together with each other for support.

**Consultation question 14. Do you support the package of recommendations and actions for the transport sector? Is there anything we should change and why?**

**Support all the actions** - Support some of the action - Do not support these actions  
- Do not know - Neutral

1. We support all the actions proposed – and more. We observe that “the transport sector” involves every New Zealander, as we all use transport, both to move ourselves around and/or to receive goods/services.
2. We note that the government’s COVID-19 [response and recovery fund](#) has spent more on roads and other carbon infrastructure than on climate friendly initiatives. Auckland Council’s long-term-plan looks set to do the same.
3. We strongly support the statement on page 16 that “Reducing transport emissions is crucial to meeting our climate targets. Action here will have an immediate and lasting impact. Aotearoa can cut almost all transport emissions by 2050. The technology already exists and is improving fast.”
4. Walking and cycling are so important as means of transport with regard to addressing climate change, and have co-benefits for health and wellbeing. They need to be supported by good cycleways and footpaths, and other facilities such as secure park and ride for public transport. Our preferred “micromobility option” is walking.
5. We support freight moving off the road and onto rail and shipping, and electrifying rail for freight and passengers (which would also reduce air travel). A co-benefit here is less congested roads and safer trips for domestic vehicles.
6. Reliable and affordable public and shared transport systems are important. We suggest that we already have good public transport systems in place (at least, in Auckland), but that there needs to be more uptake, by incentivising people more, showing by example, sharing stories in the media, keeping fares low and providing free travel options and free opportunities. People who have never used public transport before or only used it in the distant past should be encouraged to find out what is available to them and try it out. The media, local politicians and celebrities should be able to assist with this.
7. CTA, as well as many other community organisations (e.g., Generation Zero and Living Streets Aotearoa), have consistently submitted to local government on the importance of “communities [that] are well designed, supported by integrated, accessible transport options, including safe cycleways between home, work and

education (pages 119-120).” We are not sure that much “further investigation” (page 119) or evidence is needed about urban form and its relationship to climate change.

8. An electric or low emissions transport fleet is important, and we support the Commission’s emphasis on EVs, though we would like this emphasis extended from private cars to buses, and more emphasis on e-bikes as an effective alternative to e-cars. We understand that EV ownership tends to increase car use, as it is cheaper to travel.

9. We would like to see further government encouragement and support for working from home. We note that choices about where to live and work play a part in climate change. We need more of a cultural shift with regard to people choosing to live close to where they work and working remotely.

10. Government action to reduce the cost of electric cars, and phasing out imports of new petrol and diesel cars is supported. However, we see that there needs to be more work done on not just replacing one car type with another but replacing the car with something else, e.g., community cars, public transport, e-bikes and more active transport.

11. Many people in cities own large vehicles for status rather than purpose and this should be discouraged, e.g., they should have to pay a road user charge / tax unless they have a legitimate reason for owning a large vehicle.

12. We support the following (page 88): “Policies that encourage a second-hand electric vehicle market, car sharing and leasing, and support to purchase an electric vehicle or electric bike.”

13. Apartment owners / neighbourhoods can be encouraged to own one (E) vehicle among all of them which can be borrowed by all on a simple and robust booking system. Neighbourly or other such community sites could run a car sharing / car pooling system. People should have incentives for car pooling and it should be made easy, e.g., suggesting a non-committal trial for new users and sharing positive stories.

14. Encouraging switching to walking, cycling and public transport (page 57) could be done by sharing stories, such as in the media and on the Genless website.

15. More and better transport options will be needed for people with disabilities and/or on low incomes.

16. We would like to see consideration given to carless days and support for carpooling. Carless days have been used in Aotearoa before. Car pooling and an acceptance of glide time would both lead to fewer one-person commuting trips. There could also be more education around planning trips so that several tasks are undertaken in the same journey.

17. We support no further internal combustion engine light vehicles imported after 2032. However, to “increase end-of-life recovery” (page 57), consideration should be given to current vehicles with combustion engines being converted into electric vehicles, as is occurring in India (see <https://www.acko.com/car-insurance/convert-your-petrol-or-diesel-cars-into-an-electric-vehicle/>)

18. Continuing to expand road capacity does not address climate change. We note that roads themselves need a lot of concrete and steel in their construction.

**Consultation question 15. Do you support the package of recommendations and actions for the heat, industry and power sectors? Is there anything we should change and why?**

Support all the actions - **Support some of the actions** - Do not support these actions - Do not know - Neutral

1. Regarding Necessary action 9, “Increase energy efficiency in buildings” which states: “We recommend that, in the first budget period the Government introduce measures to transform, transition and reduce energy use in buildings,” CTA would like the Commission to acknowledge the energy that is embodied in buildings, being the total expenditure involved in the creation of a buildings, which should be taken into account when consideration is given to destroying a building. Where we build, what we build, and how we build it will determine our lives far beyond 2050. Buildings can and should last for several hundred years

2. Necessary action 10, which addresses urban form, could also be informed by the embodied energy and “greenness” of already existing buildings. Please refer to our point 3 in question 18.

**Consultation question 16. Do you support the package of recommendations and actions for the agriculture sector? Is there anything we should change and why?**

**Support all the actions** - Support some of the actions - Do not support these actions - Do not know - Neutral

1. CTA notes that nearly half of Aotearoa’s total emissions are from biological emissions from the agriculture sector and that emissions from agricultural processing and transport, and the use of synthetic nitrogen fertiliser release more climate pollution than our domestic aviation industry.

2. Aotearoa should aim for the most ambitious target for agricultural emissions, rather than the bare minimum.

3. We agree with the statement on page 14 that “There are changes farmers can make now to reduce emissions on their farms while maintaining, or even improving, productivity. This includes reducing animal numbers and better animal, pasture and feed management.”

4. As regards genetic engineering as a potential way to reducing emissions from the food and fibre system we note that “discussions about the acceptability of different approaches” (page 121) have already taken place in Aotearoa about GE and this is not an option that is looked upon favourably by many. The Auckland region is officially GE-free under its Unitary Plan.

5. CTA would like to see faster action to reduce agricultural emissions, including more farms moving to regenerative and organic farming. Government funding support should be provided, as well as regulations to reduce the use of products like synthetic nitrogen fertiliser. Innovative farmers who make – and have already made – the transition should be given incentives and rewards. Alongside this, the

government should regulate for the price of meat and dairy to go up and the price of fruit, grains and vegetables to go down. This would have health co-benefits.

6. Methane vaccines are not currently available, so we cannot include them in our climate actions.

7. Low emissions breeding for sheep is a long-term goal, as such breeding is slow, around 1% per year (See <https://www.pggrc.co.nz/news/sheep-farmers-now-able-to-breed-low-meth>)

8. A faster option is to reduce numbers of livestock and for New Zealanders to be encouraged to eat less meat. Reducing meat consumption will presumably be easier for the younger generations who have not been brought up on the traditional Aotearoa diet of meat at almost every meal. Many young people have made this switch already. The Genless site suggests one meatless meal a week. It could suggest a transition to only one meat meal a week. It could include vegetarian protein recipes and stories from vegetarians about their health and lifestyle.

9. Cutting climate pollution from agriculture could include specific regulations such as bans and caps on the sources of pollution, including a sinking cap on livestock numbers, synthetic fertiliser and imported feed, with bans by 2025.

10. We need more of a shift to diversified, mixed land-uses that include more plant-based food, fibre and timber.

**Consultation question 17. Do you support the package of recommendations and actions for the forestry sector?**

**Is there anything we should change and why?**

**Support all the actions** - Support some of the actions - Do not support these actions  
- Do not know - Neutral

We support all the actions, and more, and faster, and feel that we have already explained our answer when responding to other questions.

**Consultation question 18. Do you support the package of recommendations and actions for the waste sector? Is there anything we should change and why?**

**Support all the actions** - Support some of the actions - Do not support these actions  
- Do not know - Neutral

1. CTA supports all the actions, and more, and faster. Furthermore, rather than just focusing on recycling and keeping waste out of landfill, we should be creating less waste in the first place.

2. As regards reducing methane emissions from organics that end up in landfills, much of this is food waste. At the same time as reducing these emissions, we could be feeding hungry people, by recovering much more food than is currently done (thanks to a myriad of voluntary organisations via such initiatives as community meals using rescued food, and community pantries). We note that the Auckland Council's Waste Plan includes very little about food recovery.

3. As regards building waste, we would like to draw attention to the embodied energy of already existing buildings, as well the amount of energy that is required to destroy a building and the waste that is created. It is worth keeping in mind that where any “green building” is constructed, there was likely already a building in that same location, which can be considered as having an allocation of “greenness” simply because it already existed. Adaptive re-use needs to be provided for in a policy framework in the context of existing housing, i.e., when taking into account the embodied energy in existing buildings, relocation or partial re-use may be preferable.
4. We should not send any of our waste to other countries. It is our responsibility to deal with our own waste.
5. As stated on the Genless website: “A better quality product should last longer and do a better job. If you don’t have to replace it, it saves another product being created – and all the emissions that go with it.”
6. We note the Commission’s comment on page 126 that, “A lack of collection and processing infrastructure means that opportunities to divert and recover waste are currently inconsistent and limited.”
7. In addition to public education to help reduce overall consumption, resource recovery centres should be supported by central and local government, as well as places that recycle goods, such as hospice shops, and funding should go into supporting and training people to repair items. This could include currently unemployed and/or homeless people.
8. We support establishing a nationwide container deposit scheme and funding community-led recycling centres to establish container return points and e-waste drop-offs.
9. We like the practice in Berlin where people put items they don’t want in a banana box on the street, and other people take what they can use. We suggest that Auckland Council considers reinstating the non-organic waste collection where unused items are put on the street at designated times and other people take them away and make use of them. If the problems with these collections cannot be solved, then councils should support getting unused items to resource recovery centres, such as organising free pick-up and delivery.
10. CTA supports product stewardship schemes, whereby producers and importers are responsible for the environmental footprint of their products, including end of life disposal. We agree that the New Zealand stewardship scheme should be extended beyond the six “priority products.”
11. We strongly support investigation into how and where minerals and metals used in low emissions technologies, including EV batteries, are sourced, recycled and disposed of.
12. Long-lived GHG emissions generated from the extraction, production, transport and consumption of packaging and goods should be included in the draft advice.
13. Companies that have for years used sustainable packaging should be acknowledged and used as examples for others to learn from.



14. Ideally, products that cannot be effectively reused, repaired, recycled or composted should drop out of the economy.
15. Buying locally grown food and locally made goods should be supported, including the local markets where much of these products are sold.
16. More organic waste (but not reusable food) could go to local and regional composting. Community gardens could be supported.
17. Aotearoa has made a start by banning single use plastic bags, and the public have adapted well to using alternatives. More policies are needed to reduce single use plastics and packaging, e-waste, textile, and construction and demolition waste.
18. Any “high-value products that are in demand locally and globally” (page 11) should be the ones that we are encouraged to buy.

**Consultation question 19. Do you support the package of recommendations and actions to create a multisector strategy, and is there anything we should change?**

Support all the actions - Support some of the actions - **Do not support these actions** - Do not know - Neutral

1. On page 134, the draft advice states: “The Government has recognised that the regulatory framework governing conduct in the NZ ETS market is patchy and incomplete. It has established a work programme to address the lack of good governance and associated risks, which include insider trading, market manipulation, false or misleading advice to participants, potential lack of transparency and oversight of trades in the secondary market, money laundering, credit and counter-party risks and conflicts of interest.”
2. We do not support use of the Emissions Trading Scheme to encourage businesses to change their technologies over time. We need to focus on reducing emissions within Aotearoa, not buying carbon credits from overseas.
3. We know that some individuals and businesses have already undertaken voluntary action to reduce emissions. These could be given awards or branding, similar to Green Building Awards.
4. CTA prefers alternative policy instruments, such as audits (either voluntary – or perhaps mandatory for companies over a certain size) or a carbon tax and other regulatory measures instead of the Emissions Trading Scheme.
5. The ETS is not useful because global carbon prices are not certain. It does not seem to make sense to carry on emitting and polluting and to pay for emissions or be able to make money from selling credits for not emitting.

**Consultation question 20. Do you agree with Budget recommendation 5 on the rules for measuring progress? Is there anything we should change any why?**

Support all the actions - Support some of the actions - Do not support these actions –

**Do not know** – Neutral

**Consultation question 21. Do you support our assessment of the country's NDC? Do you support our NDC recommendation?**

Fully support - **Partially support** - Neutral - Do not support (too ambitious) - Do not support (not ambitious enough) - Do not know

There is uncertainty as to what effect changes will have, so we should do as much as we can.

**Consultation question 22. Do you support our recommendations on the form of the NDC?**

Support - **Somewhat support** - Do not support (too ambitious) - Do not support (not ambitious enough) - Do not know

1. It would seem that using the IPCC data is the right thing to do.
2. We strongly support providing climate finance to developing countries. (See our answer to big issue 3 and question 13.)
3. We do not know what is meant by “active participation in mitigation mechanisms for international aviation and shipping” (page 166) but if it means less flying and less use of ships, we are in support.

**Consultation question 23. Do you support our recommendations on reporting on and meeting the NDC? Is there anything we should change, and why?**

Support - **Somewhat support** - Do not support (too ambitious) - Do not support (not ambitious enough) - Do not know

1. We do not think international carbon markets should be used and Aotearoa should not purchase offshore mitigation. Our efforts should be in our own country. We have the tools to do this.
2. Industrial-scale bottom trawling releases 1 billion metric tonnes of carbon, more carbon than the global aviation industry. The government should put a stop to this practice.

**Consultation question 24. Do you support our assessment of the possible required reductions in biogenic methane emissions?**

Fully support our assessment - **Somewhat support our assessment** - Do not support our assessment - Do not know – Neutral

1. CTA is of the view that more and faster changes to farm management practices can occur, including reducing stock numbers. As stated previously (question 16), selective breeding of sheep is a slow process and therefore is a long-term outcome, and it seems that low-emission cattle are not here yet. We need to start with what is possible now, and add in other options later, if they prove to work.

2. As per our answer to question 18, much food “waste” can be recovered and used to feed people.

3. We do not think we can look into a low emissions future very far in advance or predict that “where red meat and dairy products continue to be consumed there is good reason to believe that production in Aotearoa would still be globally competitive” (page 179).

4. Due to the “rapid development of alternative protein industries” and “consumer preferences for environmentally sustainable products” (page 180), rather than seeing these developments as competition for our country’s agriculture, we suggest the Commission advises our government also look to developing and producing plant-based protein products and synthetic meats from laboratories.

5. We are pleased to know that “Aotearoa leverages its expertise in efficient agricultural production to support emissions reductions and sustainable development in other countries” (page 179) and trust that this will continue, and that Aotearoa will also be able to learn from other countries.

6. Page 179 seems to contain the only reference to the size of the world’s population, potentially “reaching more than 9 billion people by 2050,” in relation to people needing to be fed. In our view, the advantages of a smaller world population should not be left out of the conversation about climate change.

#### **END OF SUBMISSION**

Date: 28 March 2021

Signature



A handwritten signature in black ink, which appears to read "Audrey van der Meer". The signature is written in a cursive, flowing style.

Secretary, Civic Trust Auckland