



## **Submission of Civic Trust Auckland**

### **Emissions Reduction Plan**

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### **Civic Trust Auckland**

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

The aims of the Trust include:

- Preservation of heritage, in all its aspects
- Protection of natural landforms
- Encouragement of good planning for the city and region.

### **Introduction**

We have read the Emissions Reduction Plan discussion document and our submission gives feedback on some of the ideas in the document, as well as answering some specific questions and providing additional ideas.

CTA is generally supportive of all the assumptions and proposals in the discussion document, except for the Emissions Trading Scheme. (Our reasons for this are outlined in our point 7.1.)

Table 4 on pages 14-16 lists the new strategies and policies on which feedback is sought. They all seem to be technologically achievable, economically viable and socially acceptable, and we would like to see them implemented as soon as is practicable.

We congratulate the government on the actions that it has already taken to reduce the emissions in Aotearoa New Zealand. However, we are concerned that the government is moving too slowly to introduce changes. The government declared a climate change emergency on 2 December 2020 (18 months after several councils declared a climate emergency) and yet our country – and many others – have not been responding as though this is an emergency.

As a developed country, Aotearoa New Zealand has a responsibility to act quickly and contribute meaningfully to the global effort. Our efforts should reflect our economic status, our ability to take action, and our high historical and current per capita emissions.

CTA's answer to the question: "What do you think are the most important things to be considered in the development of the emissions reduction plan?" would be that of utmost importance is to move as quickly as possible.

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

## **1. Transport**

**1.1.** CTA feels there could be a more ambitious target than 20% by 2035 for reduction in vehicle kilometres travelled by cars and light vehicles. In our view, it should be at least 20% by 2030 and at least 30% by 2035. This can be assisted by a focus on walking, cycling and public transport as very beneficial modes of transport, not just for the reduction of emissions but for their various co-benefits, as the discussion document mentions on page 55.

**1.2.** In our view, in Auckland, there is already a good public transport system in place (though with some unfinished linkages, such as to the airport) – it just needs more people to be encouraged, by their peers, their employers, and the media, to use it. This could be achieved by appointing a Public Transport Champion. This could be a rotating role amongst people of different demographics, who use public transport themselves and tell the positive stories of people travelling by public transport. People who have never used a bus, train or ferry before or only used it in the distant past should be encouraged to find out what is available and try it out. The media, local politicians and celebrities should be able to assist with this (and they should be encouraged to follow some local leadership surrendering car-related benefits).

**1.3.** We support free and/or subsidised public transport for community service card holders, under 25s and tertiary students, as per the Aotearoa Collective for Public Transport Equity.

**1.4.** We propose that buses travelling over the Auckland Harbour Bridge be fitted with bicycle racks and that the dedicated space for wheelchairs, if not occupied by a wheelchair user, be available for use by cyclists.

**1.5.** CTA supports divesting all public funds from fossil fuels and other activities that cause climate change.

**1.6.** We think that a date for the end of importing new fossil fuel cars into Aotearoa New Zealand should be set, once electric cars are more affordable.

**1.7.** CTA supports the requirement (page 62) that only zero-emissions public transport buses be purchased after 2025, and the target of decarbonising the public transport bus fleet by 2035. We also support increased investment and resilience in the rail network and in coastal shipping. Not only would the development of coastal shipping get vehicles off roads, it could contribute to civil defence resilience in the event of natural disasters, as the major coastal cities would form a useful ring.

**1.8.** We further suggest that in Auckland's case, more use could be made of inland water transport, as there are many areas with rivers within the region.

**1.9.** We think that the initial actions listed on page 64: "Integrate land-use, urban development and transport planning and investments to reduce transport emissions" need to be complemented by more immediate actions.

**1.10.** We support the priority (page 65) of completing connected cycle networks, at the same time noting that some parts of the network are difficult to connect. We observe that cyclists can get off their bikes to walk where there is a traffic pinch point until there are seamless cycle routes.

**1.11.** With regard to “further roadway expansion and new highways to be consistent with climate change targets” (page 69), we suggest that roads could be a lighter and more environmentally conscious colour. See this study:

[https://ec.europa.eu/environment/integration/research/newsalert/pdf/219na4\\_en.pdf](https://ec.europa.eu/environment/integration/research/newsalert/pdf/219na4_en.pdf)

**1.12.** CTA supports rapidly adopting low-emission vehicles and fuels (page 69), with consideration given to higher costs and differing abilities to meet these costs.

**1.13.** On page 70 it is stated that: “We will give extra support to implement community-based and Māori-led schemes to make low-emission vehicles (including e-bikes) more accessible – for example, social leasing, shared mobility schemes run by community/iwi/hapū, rent-to-buy or gradual payments, car and bike sharing.” CTA supports this and suggests that carpooling be promoted more. Here are some ideas used by companies: <https://rideamigos.com/how-to-encourage-employees-to-carpool> See also: <https://drivesed.com/trending/how-and-why-people-carpool>.

**1.14.** We note that in the UK, leaving an engine idling is an offence under Section 42 of the Road Traffic Act 1988. The Act enforces rule 123 of the Highway Code, which states: “You MUST NOT leave a vehicle’s engine running unnecessarily while the vehicle is stationary on a public road.” If such a rule were introduced in Aotearoa New Zealand, this would serve to reduce emissions and make drivers more conscious of their energy use.

**1.15.** Auckland Transport and other transport agencies (or some independent initiative) could set up a system whereby people can find others looking to share rides and where people can share positive stories about car pooling and ways to make it successful. There could be incentives for carpooling and it should be made easy, e.g., suggesting a non-committal trial for new users. In these days of GPS, there must be potential for technical advances around carpooling to create linkages between users and the various modes of transport.

**1.16.** An acceptance of more flexible working hours would lead to fewer one-person commuting trips.

**1.17.** Carless days were introduced during the petrol crisis of 1979. An improved version of this scheme could be used during the climate crisis. School students could perhaps work out a scheme for their local community and monitor its success.

**1.18.** Working from home helps to reduce emissions and many people have done this successfully during lockdowns. CTA would like to see further government encouragement and support for working from home. There needs to be more of a cultural shift with regard to people choosing to live close to where they work and working remotely, and in restructuring working practices, consideration ought to be given to potential mental health issues.

**1.19.** CTA supports leasing e-cars to shift workers who are unable to access public transport, walk or cycle.

**1.20.** We support re-establishing a regular daily competitively priced passenger rail service between Auckland and Wellington and the upgrading of regional bus services elsewhere.

**1.21.** We support investment in domestic air electric aircraft.

**1.22.** 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.

## **2. Energy and industry**

**2.1.** CTA supports immediately ending oil, gas and coal exploration and prospecting, and the government announcing a phaseout date for coal mining and use.

**2.2.** We support a plan to end the use of fossil gas, including no new gas connections after 2025.

**2.3.** We support all schools, hospitals, and other government buildings being 100% powered by clean energy as soon as is reasonably practicable.

**2.4.** The government should take over the Rio Tinto smelter when they end their operations and use that operation and its capacity expressly towards the aim of the country's transition away from fossil fuel use.

**2.5.** All state homes should have solar panels, and new private homes could be mandated to install solar panels on a minimum percentage of their roof surface. Such mandatory energy-saving standards for new homes are currently being considered in other countries such as Japan: see <https://www.japantimes.co.jp/news/2021/07/27/business/economy-business/japan-mandatory-energy-saving-new-homes/>

**2.6.** The retail electricity market should be simplified and consumers made aware of which energy providers are using renewable energy sources.

**2.7.** Aside from changing the type of energy we use, we need to reduce our energy demand. While power meters are on house exteriors, perhaps technology could be used to remind us more poignantly of our domestic energy usage.

## **3. Building and construction**

**3.1.** The installation of heat pumps in government housing can help to reduce emissions and has the co-benefits of healthier, warmer homes, improving the accessibility of older housing stock, and saving on power bills.

**3.2.** Instead of sending buildings to landfill and building new ones to replace them, they should be refurbished, retrofitted, and their lives extended, for example, by having more storeys built on top of them or being lifted up so there can be more floors underneath them. As well as saving waste from demolition, this saves on materials for building new houses. These and other ideas should be included in the Building for Climate Change programme.

**3.3.** Plan rules to require relocation as a condition of consent for a new build should be instigated. Too much practically useful building stock is simply going to landfill.

**3.4.** The lifespan of buildings can be prolonged by designing them so that they can be easily repaired: by using modular components, designing for disassembly, making use of extended producer responsibility agreements, and ensuring smart, performance-based maintenance schemes. Planned obsolescence as a business model is simply no longer acceptable in the

face of climate change. Buildings should be designed to stand for hundreds of years rather than decades, as is currently the case.

**3.5.** Q 78 reads: “The Ministry of Business, Innovation and Employment (MBIE) is considering a range of initiatives and incentives to reduce construction waste and increase reuse, repurposing and recycling of materials. Are there any options not specified in this document that you believe should be considered?” We would like to emphasise that adaptive reuse of heritage buildings, as well as buildings in general should also be considered in the first instance. An example is the CAB in Auckland’s civic square, where a recent promotion for these apartments states: “The most environmentally friendly new build is the one you don’t actually build.... The CAB has reused its original steel frame.... Reusing such a large portion of the building (after passing considerable forms of strength testing) vastly reduces its carbon footprint.... Our team has painstakingly removed 19 floors/2,130 tonnes of concrete and diverted 98% of the demolition material from landfill.”

#### **4. Agriculture**

**4.1.** In response to Q2, we would like to see the national herd size and stocking rates in accordance with the Climate Change Commission’s recommendations, and synthetic nitrogen fertiliser phased out at least by 2030.

**4.2.** In addition to reducing numbers of livestock, New Zealanders can be encouraged to eat less meat. Reducing meat consumption will presumably be easier for younger generations who have not been brought up on the traditional Aotearoa New Zealand diet of meat at almost every meal. Many young people have made this switch already, for health, as well as other reasons. 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.

**4.3.** Though it would not necessarily alter meat consumption, some of the carbon cost of meat production could logically be borne by the ultimate market where it is consumed.

#### **5. Waste**

**5.1.** CTA is in strong support of new rules to reduce unnecessary product packaging, especially plastic packaging. We have the same view in relation to labelling, such as the non-bio-degradable plastic labels put on individual pieces of natural produce.

**5.2.** We consider it to be very important to support farmers to adopt regenerative farming practices that restore soil, water, and air quality, including funding to help them do this. There needs to be a recognition that some farmers and supporters of farmers have very strong resistance to new farming practices and that some do not believe in climate change, so listening to their views and ongoing discussions with them need to be considered.

**5.3.** In response to Q 99: “What other options could significantly reduce landfill waste emissions across Aotearoa?” CTA suggests that more pantries and community fridges throughout the country would achieve this. There is much more scope for food to be reused rather than being relegated to waste and sent to landfill. There could be many more community pantries and fridges established throughout the country. The open street pantries: <https://www.patakai.co.nz/> could be better publicised, including on the GenLess website.

**5.4.** Regarding the “Targeted investment and improved management of what goes where within our disposal and resource recovery systems” described on page 102, there are many community initiatives in place for food recovery where the cost is covered by community

volunteers; they just need to be more in the public eye. They don't need any extra incentives (as suggested on page 103); the desire to feed hungry people and prevent food waste is enough, and they are also aware that they are reducing emissions.

**5.5.** CTA supports the following: “key organic materials such as food, green, and paper waste could also be banned from Class 1 landfills by 2030” (page 103).

**5.6.** We support the government funding campaigns such as Love Food Hate Waste and GenLess.

**5.7.** CTA supports phasing out junk mail (page 104), increasing education on and access to reusable nappies, and regulated product stewardship for textiles and clothing. We think there should definitely be a focus on reducing consumption in all sorts of areas.

**5.8.** CTA supports resource recovery centres. These enable items to be reused and recycled, preventing them from going into landfill.

**5.9.** As regards building waste, we draw attention to the energy already embodied in existing buildings, the amount of energy required to demolish them, and the waste subsequently created from the demolition process, in addition to the waste arising from the new building process. Where any is constructed, there was likely already a building in that same location, which can be considered as having achieved “greenness” simply from its continued existence. In the process of deciding whether to modify and adaptively reuse an existing building or construct a new building, there should be some analysis and account taken of the energy already embodied in the existing building. If the embodied energy in existing buildings is taken into account, relocation or partial reuse may be preferable, and so in the context of existing housing, adaptive reuse needs to be provided for in a policy framework.

**5.10.** Aotearoa New Zealand should not send any of our waste to other countries. It is our responsibility to deal with our own waste. We also shouldn't be purchasing carbon credits for forests planted in other countries to compensate for excessive carbon emissions in our country.

**5.11.** 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.

**5.12.** We support establishing a nationwide container deposit scheme and funding community-led recycling centres to establish container return points and e-waste drop-offs.

**5.13.** Ideally, products that cannot be effectively reused, repaired, recycled or composted should drop out of the economy.

**5.14.** Regulations have recently been brought in by the EU requiring manufacturers of large consumables such as washing machines, dishwashers, refrigerators to make spare parts and repair documentation available to professional third-party repairers. There has also been rising public demand for the “right to repair” smaller consumables, and replace key components like phone batteries.

**5.15.** We need better recycling technologies in Aotearoa New Zealand, alongside manufacturers creating less waste to begin with.

## **6. Forestry**

**6.1.** Protecting already existing native forests is better than planting new forests, which take a long time to mature.

**6.2.** CTA is concerned that in Auckland, more trees are being cut down than are planted. We would like to see the general tree protection rules that existed under the RMA until 2015 reinstated. The Tree Council estimates that one third of Auckland's tree canopy has been lost since general tree protection was removed. Since then, the rate of housing redevelopment and the high value of land has fuelled the loss of an estimated 250,000 trees.

**6.3.** 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.

**6.4.** With regard to encouraging greater afforestation with native trees (page 117) , we point out that the Resource Management (Enabling Housing Supply and Other Matters) Amendment Bill is likely to encourage further de-greening with its new densification rules, where the minimum distances from the boundaries means that there is no room for trees, grass or much greenery at all.

**6.5.** CTA supports restoring and expanding our native forests. Other native planting should also be carried out, such as tussocks, wetlands and mangroves, along with protection of such areas. Perhaps members of the public and schools could be allocated “allotments” within native forest areas, where they can plant, nurture and monitor native species. Aotearoa New Zealand has a labour force, including those currently unemployed or needing new employment in a green economy, who could carry out planting as well as pest control.

**6.6.** Controlling browsing pests could offset up to 15% of Aotearoa New Zealand's net emissions, as well as preventing new plantings from being destroyed. Possums, feral deer, goats, and pigs should be controlled on all public land.

**6.7.** 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. Christchurch, by way of example, has a reputation for having one of the most diverse collections of trees worldwide and this is an attribute that would be worth protecting as it would bring a number of benefits: climate change, civic amenity and potentially tourism.

**6.8.** 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. If we are facing a climate change emergency, any debate as to the merits of “native” versus “exotic” is somewhat academic. Mature exotic trees have a part to play in carbon removal and need protection.

## **7. Other feedback**

**7.1.** We do not support the Emissions Trading Scheme for the following reasons: some of the largest polluters in the country are exempt from the ETS, it is complex and it has limited direct impact. We support focusing on reducing emissions within Aotearoa, rather than buying offshore carbon credits. We do not support use of the ETS to encourage businesses

to change their technologies over time. We suggest 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 ETS. 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.

**7.2.** We would like the government to ensure cross-party support for its climate change ideas so that future governments do not change policies that this government puts in place.

**7.3.** Climate change is not simply a result of human activity but of too much human activity. A reduction in the world population needs to be part of climate change conversations.

**7.4.** Regarding questions 42-44 re information, tools, forums, messages and/or sources of information, we are aware of the GenLess website and the Auckland Council Live Lightly site. These and other such forums around the country could inform each other. We feel there could be much more information made available on these sites and there should be facility for the public's suggestions to be included.

**7.5.** We support the Climate Change 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.

**7.6.** CTA recognises that many businesses, community groups and individuals have made good changes and choices already to reduce emissions and waste, and we applaud them. They could perhaps be given awards or branding, similar to Green Building Awards.

**7.7.** Aotearoa New Zealand should learn from other countries, especially those 16 countries that have already reduced their emissions, such as the EU; 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/>).

**7.8.** CTA supports the government funding research into modes such as wave energy from the sea, whether this research is based in Aotearoa New Zealand or not. According to the European Commission, sea waves have a great potential as renewable energy source – and Aotearoa New Zealand is surrounded by sea. Wave energy technology is a field in continual development, but is not yet competitive with the other renewables. This was the situation with solar and with electric cars some years ago.

**7.9.** 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.

**7.10.** Schools could play a part in producing energy and reducing waste, and educating the rest of the population.

**7.11.** CTA strongly supports a nature-based solutions chapter being included in the plan.

**7.12.** Auditing/monitoring of policy in relation to action (or inaction) on climate change should be put in place to ensure and measure the success of those policies.

**7.13.** Climate change should inform every decision made at every government level, both local and central.

**7.14.** The government should support meeting online instead of face-to-face for at least some of the time, at all levels of society.

**7.15.** The government could promote “Climate Change Champions” throughout the country. Many of these people could be young people, including those school students who have participated in 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.

In conclusion, Civic Trust Auckland appreciates the opportunity to make these submissions and we wish the Government every success in its deliberations.

Date of submission: 24 November, 2021

Signature:



A handwritten signature in black ink, which appears to read "Audrey van Ryn".

Audrey van Ryn  
Secretary, Civic Trust Auckland