

Greenpeace Aotearoa
23 November 2021

EMISSIONS REDUCTION PLAN DRAFT DISCUSSION DOCUMENT SUBMISSION FROM GREENPEACE AOTEAROA

To whom it may concern,

Thanks for the opportunity to submit to the draft discussion document for the New Zealand Emissions Reduction Plan (hereafter, 'the ERP document').

Greenpeace Aotearoa has previously made several comprehensive submissions to the Government recommending policies, actions and investment to stop climate change, backed up by a vast amount of evidence. Because Greenpeace has little faith in this latest round of consultation, we are linking to these previous submissions where this evidence has been presented rather than spend our time reiterating it. Please refer to these previous submissions and evidence as part of this feedback.

You will also see our key recommendations on billboards in Wellington over coming weeks, which are also part of our formal submission. The billboards focus on agriculture – because agricultural emissions are 48% of the country's total. If the Government, and the ETS fail to address agriculture, they fail to address climate change.

Greenpeace's key full recommendations to the ERP document address climate change are also reiterated below and in the following submission.

Overall, our submission recommends, in agriculture,

- Phase out synthetic nitrogen fertiliser
- Reduce the cow herd
- Phase out supplementary feed such as Palm Kernel Expeller
- Invest in more plant based, regenerative - organic agriculture

In transport

- Reorient transport funding away from road building
- Provide more money for sustainable and active transport (public transport, walking and cycling)

The Emissions Reduction Plan (ERP) is an important, albeit delayed, document in an essential process to map out Aotearoa's pathway to achieving Paris Climate Agreement greenhouse gas emission reduction targets and to avoid further environmental and social damage from climate change.

However, we are concerned that the ERP itself has been delayed, and yet another round of consultation is in its place. Consultation without action is meaningless. We need policies and tangible investments that will cut emissions now. Even while we write, the Covid Response 'Fast Track' process looks set to support more motorway lanes and the production of more synthetic nitrogen fertiliser. These are the opposite of what's needed to address climate change, and make this consultation a farce. We need real and appropriate action on cutting emissions from agriculture and transport, not more government funding and support for roads and fertiliser manufacture.

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The science is clear, the position of Greenpeace Aotearoa is clear and has been made clear in numerous submissions. Get on with cutting emissions, particularly agricultural emissions, which would reduce New Zealand's contribution to climate change and restore the faith of civil society that this issue is being dealt with in a manner appropriate to the crisis at hand.

This Government has consulted the public on numerous plans and documents pertaining to climate change over the last four years it has been in power. We have engaged in many of these processes in good faith and yet the Government has failed to enact evidence-based policies that would actually reduce climate emissions, which have grown in this Government's term and remain at an all-time high.

Introduction

Greenpeace is a global, independent campaigning organisation that acts to protect and conserve the environment and to promote peace. Greenpeace is one of the world's largest and oldest environmental organisations, operating for half a century, since 1971, and now works in more than 55 countries. The New Zealand branch of Greenpeace (Greenpeace Aotearoa) was founded in 1974 and has grown to represent 35,000 financial donors and many tens of thousands of supporters.

Greenpeace Aotearoa has an interest in the ERP document because of our vision for a world where people and nature are thriving - where our homes, schools, business and transport are powered by clean energy from the sun, wind and water; where our food is grown in ways that regenerate the land, store carbon in the soil, clean up rivers and bring back wildlife; where both the ocean and native forests are rebounding and teeming with life. Our vision is an Aotearoa where our children, grandchildren and generations to come can grow up safe from the threat of climate change.

Greenpeace has been working specifically on the issue of climate change for more than three decades. Addressing this existential crisis has never been more urgent. Climate change is already taking lives and damaging health, homes, food security, culture and livelihoods. It is already accelerating the extinction of the wildlife and wild places with which we share this Earth. Poor and marginalised communities are already suffering the most, despite being the least responsible for causing this crisis.

We have known about this looming catastrophe for decades. We have known who and what has been causing it, and we have had access to the solutions to prevent it getting to this point. This global disaster is a direct result of Governments around the world failing to stand up to those climate polluting industries and vested interests that are insistent on maintaining profits no matter the consequences. Globally, Government action, or inaction, over the next decade will determine the future for billions of people and the wildlife we share this planet with. Through this ERP document and its failure to address agricultural emissions, this Government fails to stand up to the vested interests and polluting industries who are most responsible for causing climate change.

As with the Climate Change Commission consultation document, Greenpeace does not, at all, therefore support the currently very low level of ambition, its

vision or its package of recommendations for Aotearoa's largest climate polluter - agriculture.

Past Government failures to act are perpetuated by the delays in the ERP and by the failure in this document to engage with agricultural emissions. Moreover, Greenpeace believes that this consultation process is unreasonable and unrealistic on top of the myriad of previous consultation processes which appear to have disregarded the well-intended and exhausting input from civil society and institutional actors such as ours.

That agriculture gets a virtual free ride makes a mockery of other policy attempts to address climate change, and imposes a bigger burden on the rest of us.

It's also not credible to expect people whose daily lives will be directly affected by climate change, to wade through yet another consultation document which in this case has more than 100 separate submission questions. It is overwhelming even for a well-resourced organisation like Greenpeace Aotearoa.

For this reason, and because Greenpeace has little confidence that our submissions will be listened to, we limit our response to this ERP document, to restating positions we have already expressed in the long line of previous consultations on this subject.

Please find these reiterations below, grouped under subject headings.

1. Agriculture

The Government's response to the existential climate crisis is desperately inadequate. It imposes inequitable burdens on individuals and communities who have least caused climate change and who have least benefited from those causes. This is most obvious in the special treatment given to the agriculture sector, industrial dairy in particular.

Agriculture causes 48% of Aotearoa's greenhouse gas emissions. Rhetoric about a 'plan for all New Zealanders', and the 'team of five million' clearly don't apply to the agricultural sector which continues to get a free ride in its climate change contributions and other environmental effects. The Government can't be seen to take climate change seriously when the most egregious polluters are excluded from the Emissions Trading Scheme (ETS), as well as the latest COP26 pledge to reduce methane emissions by 30% by 2030.

The solutions to agricultural emissions are clear, overdue, and essential to the credibility of the Government on this issue.

- Eliminate synthetic nitrogen through a sinking lid
- Phase out imported supplementary feed such as palm kernel expeller
- Prohibit new dairy conversions
- Lower the cow stocking rate through a maximum stocking density
- Support a (just) transition to plant based, regenerative organic farming

This will all make a major contribution to our climate emissions with significant co-benefits for fresh and drinking water, as well as animal welfare and biodiversity.

Instead of loose talk about mitigation, technofixes and offsets, action is what is needed to address climate change and agriculture's contribution to it. Paying up to \$1.5 billion in offshore offsets announced in the Nationally Determined Contributions regime, are a huge subsidy for the polluting effects of industrial dairy. So is the general free ride given to agriculture through its exclusion from the ETS.

We oppose relying on better rural broadband and unproven and currently non-existent technologies such as methane vaccines, or incremental techno-fixes such as nitrous oxide inhibitors to cut emissions. We oppose relying on He Waka Eke Noa or any other unenforceable industry self-regulation, voluntary measures, or agreements. And we oppose reliance on possible regulation in other sectors - such as water regulations - to transform agriculture rather than direct climate regulation.

Greenpeace also opposes the current application for Kapuni hydrogen plant which will be used to support the manufacture of synthetic nitrogen fertiliser while promising limited capacity, longer term green hydrogen production.

Find further details in our submission to the Climate Change Commission [here](#).

2. Transport

The transport section of the ERP document is the most developed. We support many of the proposals included, but they must be part of an approach which considers and addresses all the other sectors too, including agriculture and energy. The words in this section are fine, but action speaks louder than words. The ERP document says one thing, but Government funding does another, as with the new announcement for more motorway lanes between Papakura and Drury in Auckland.

Greenpeace recommends:

- Reorient transport funding away from road building
- Provide more money for sustainable and active transport (public transport, walking and cycling)

We refer you further to the recommendations in particular, in the joint submission from All Aboard Aotearoa which includes Greenpeace, to <https://www.greenpeace.org/aotearoa/story/all-aboard-aotearoa-submission-on-the-draft-regional-land-transport-plan/>

3. Energy and industry

The ERP document energy section focuses on plans to write plans. The necessary climate change responses are known but deflected to some future date. Action is more important than more words in plans or plans to make plans.

As per our submission to the [Climate Change Commission](#), to seriously address climate change through emissions reduction, the Government should:

- Provide grant funding for community energy schemes and zero interest loans for household solar

- Remove barriers to community energy projects and provide a one-stop-shop of information on how to develop community energy projects
- Install solar panels on government buildings, schools and social housing
- Extend finance and support for home insulation and heat pumps with a goal that all 600,000 under-insulated homes are insulated in the next 10 years
- Update the Building Code so that all new homes are net zero, following passive house standards
- Build all new Kāinga Ora and KiwiBuild homes according to passive house standards, including clean energy generation, rainwater collection and greywater recycling.

Also,

- Ban the issuing of new oil and gas prospecting and exploration permits onshore in Taranaki
- Ban the application for and issuing of new coal mining permits
- Revoke all unused fossil fuel (coal, oil, gas) permits and end all fossil fuel (coal, oil, gas) permit extensions
- Ban all new coal, gas and diesel infrastructure and phase out all existing coal, gas and diesel infrastructure by 2030, and
- Make our biggest polluters pay by immediately ending subsidies via free carbon credits.

For other specific points, please refer to [our submission](#) to the Ministry of Business, Innovation and Employment on Energy, as well as our submission to the Climate Change Commission.

4. **Waste**

Please see the full recommendations and evidence already presented to the [Climate Change Commission](#).

In brief, our recommendations include:

- Provide more detail on the interventions needed to reduce organic waste to landfill
- Implement binding reduction targets for all waste streams
- Increase waste levy revenue and invest it in community-scale solutions at the top of the waste hierarchy
- Measure and increase circularity in our economy
- Strengthen the approach to product stewardship to ensure materials are kept in circulation and product lifespans are extended
- Products that cannot be effectively reused, repaired, recycled or composted should be designed out of the economy.

5. **Forestry**

We refer to the main points made in our [submission](#) to consultation on the Zero Carbon Bill.

The main point is that an over-reliance in the short to medium term on forests as carbon sinks must not be used as a way of avoiding making more substantial and essential reductions in gross emissions, particularly through addressing agricultural emissions.

From the joint submission to the [Climate Change Commission](#), we recommend

- Consider how sovereignty will be returned to mana whenua to manage land, to uphold article 2 of Te Tiriti o Waitangi.
- Significantly increase new native forests
- Stop further native deforestation and degradation of all native habitats
- Recognise the role of wetlands and tussock in storing carbon and protect these ecosystems from destruction.
- Address climate change while recognising the intersecting biodiversity crisis. Do not rely on exotic forestry due to the damage it causes to native habitats.
- Take a stronger approach to restore and manage existing native habitats to allow for a reduction in the proposed exotic afforestation.

Conclusion

Greenpeace Aotearoa condemns the delay of the Emissions Reduction Plan and yet another episode of consultation in its place. Based on the previous refusal of this Government, over several years, to take on board the vast majority of Greenpeace's recommendations on climate policies, Greenpeace has little faith in this round of consultation on the ERP. That is why we have simply summarised our main previous points and linked you to previous submissions made on these issues. You will find the full list of recommendations and evidence there.

Consultation is no substitute for action. This is particularly obvious in that our largest emitter, agriculture, is barely mentioned, has no targets, defers to the undefined and undeveloped He Waka Eke Noa process and is excluded from the ETS. Accelerating the development of mitigations through a research and development plan and improving the delivery of extension services are frankly pathetic responses to this industrial emitter and erode public faith and confidence in the Government's claims to take climate change seriously.

Until agricultural emissions are addressed, through the elimination of synthetic nitrogen fertiliser and supplementary feed, and lowering the cow stocking rate, and are brought into the Emissions Trading Scheme, the public can have little confidence that the Government and its institutions are up to the job of recognising and addressing one of the most fundamental crises of our time. (Alongside the biodiversity crisis and our exceeding the planetary boundaries in the nitrogen cycle - all also linked to industrial dairy).

This ETS document and yet more consultation are highly insufficient responses to climate change, and a waste of the public's time. We urge more action, and less hot air.

Regards,
Christine Rose
Lead Agriculture Campaigner
Greenpeace Aotearoa

Ref:

<https://www.greenpeace.org/aotearoa/publication/greenpeace-aotearoa-submission-on-the-climate-change-commissions-draft-advice/>

<https://www.greenpeace.org/aotearoa/publication/substantive-submission-on-zero-carbon-bill/>

<https://www.greenpeace.org/aotearoa/story/all-aboard-aotearoa-submission-on-the-draft-regional-land-transport-plan/>

<https://www.greenpeace.org/aotearoa/publication/greenpeace-submission-on-renewable-energy-consultation/>

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