

24 March 2021

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Dear Sir or Madam,

Environment Canterbury submission: Climate Change Commission - Climate Action for Aotearoa

Thank you for the opportunity to make a submission on the Climate Change Commission's first package of advice to the Government on Aotearoa New Zealand's transition to a low emissions future and commitments under the Climate Change Response (Zero Carbon) Amendment Act 2019. Please find Environment Canterbury's submissions attached.

Environment Canterbury's submission is reflective of our experience in delivering our transport, urban development, freshwater management, contaminated land, flood management, air quality, biodiversity and biosecurity functions across our diverse and dynamic region. In particular our submission focuses on the Commission's recommendations regarding forestry, agriculture, waste, transport, and urban environments and the relationships of local and central governments.

Environment Canterbury looks forward to ongoing involvement as the Climate Change Commission continues their work, and ultimately the Government, takes this advice forward.

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Yours sincerely,



Jenny Hughey
Chair

Encl: *Environment Canterbury Submission on the Climate Change Commission's first package of advice*

Environment Canterbury submission: Climate Change Commission first package of advice

1. Environment Canterbury welcomes the first package of advice and the opportunity to engage with the Commission on their recommendations.
2. Canterbury has the second highest regional emissions in New Zealand, accounting for 15% of New Zealand's total emissions. Within Canterbury the largest emissions sector is Agriculture (~65% of total), followed by households (10%), manufacturing (9%), transport and services [including power and waste] (4% each), and construction and forestry and mining (2%) each. Greater Christchurch is Canterbury's largest urban area, and the second metropolitan area in New Zealand, and has a distinct profile of emissions when compared to the regional picture. Within Greater Christchurch the largest emission sector is transport (54%), followed by households and buildings (19%), agriculture (15.3%), waste (7.4%) and industrial product use (4.2%).
3. Environment Canterbury, as the first council in New Zealand to declare a climate emergency, understands and acknowledges the importance of and urgent need to address climate change for the benefit of current and future generations. Our vision and purpose are:

Taking action together to shape a thriving and resilient Canterbury, now and for future generations. Toitū te marae o Tāne, toitū te marae o Tangaroa, toitū te iwi.

4. Increasingly the sense of urgency in our purpose has only grown and the carbon budgets need to reflect a precautionary approach given the latest science indicates our carbon budgets will likely result in overshoot on the Paris 1.5 degree targets. We therefore urge the Commission in their advice to government to take a precautionary approach to setting carbon budgets that reflect this need for urgency in order to give our current and future global community the best chance at a healthy climate.
5. Our purpose also identifies the importance of taking action together. To achieve the budgets, there is a particular need to encourage substantial behaviour change. Whilst acknowledging that the Climate Commission's expertise is science and policy, there is need for substantial societal change to drive adoption of technologies and practices identified in the Commissions advice. We urge the commission to emphasise in their advice to central government that they resource large-scale public and behaviour change programme to support a just transition where individuals, families, communities understand their ability to contribute and the need for urgent action."
6. To achieve this vision, and given our responsibilities as a regional council, Environment Canterbury is pursuing several transformational opportunities that closely align with recommendations in the first package of advice. These include:
 - Accelerating regeneration of the natural environment
 - Facilitating diversification of land use

- Building community engagement and action
 - Championing safe, multi-modal transport choices
 - Leading climate change resilience
7. This submission reflects our experience in delivering our transport, urban development, freshwater management, contaminated land, flood management, air quality, biodiversity and biosecurity functions. Therefore, our submission focuses on the Commission's recommendations regarding forestry, agriculture, waste, transport, and urban environments.
 8. Environment Canterbury is grateful for the one-off co-investment Climate Resilience funding provided by the government for flood protection infrastructure to support the COVID-19 recovery. Alongside all other Regional Councils in New Zealand we are supporting a case for permanent co-investment in flood protection that is critical for climate adaptation in the future.
 9. Environment Canterbury proactively partners with Ngāi Tahu as we respond to the climate crisis. This will continue to be an important part of our climate change response. However, in respect to this submission, we look to and support the response of Ngāi Tahu to the Commission's advice regarding the implications for mana whenua, and so have not commented on specific mana whenua aspects in the Commission's advice.
 10. This advice is the first step on a vital journey for New Zealand. Environment Canterbury supports and encourages all involved with the development and implementation of this advice to be bold and ambitious in their recommendations, to act with the urgency the scale of the climate emergency requires, and to act for the wellbeing of our local, national, and international communities and environment.

Proposed emissions budgets

11. Environment Canterbury fully supports:
 - the **principles** used by the Commission to prepare the advice;
 - **budget recommendation 1, the next three emissions budgets** given that they have been calculated based on the principles, and that it puts New Zealand on track to meet the domestic 2050 targets and play our part to limit global warming to 1.5°C. However, we note recent research strongly suggesting the climate is warming more rapidly than prediction by the IPCC modelling, and question whether the measures proposed by the Commission may be inadequate;
 - **budget recommendation 2, the breakdown of the next three emissions budgets** by gases and forestry removals, given the split gas approach used in the 'Zero Carbon Act' and acknowledging that forestry removals cannot be used to offset biogenic methane emissions;
 - **budget recommendation 4, limiting offshore mitigation** as we acknowledge that strong domestic action is needed to meet domestic and international targets in the long term;

- **enabling recommendation 1, cross-party support** for emissions budgets as we agree budgets should be non-partisan and set transparently to ensure they are enduring;
- **enabling recommendation 2, coordinate efforts across Government** as we acknowledge the interlinkages between issues, sectors and policies in the climate change space and the need for integrated work programmes and consolidated funding;
- **enabling recommendation 3, genuine, active and enduring partnership with iwi/Māori.** We note Environment Canterbury is actively partnering with ngā Papatipu Rūnanga within the region on climate change related work.
- **enabling recommendation 4, central and local government working in partnership.** As a regional council, we are highly aware and supportive of an increase in productive local and central government partnerships. We see a vital opportunity to align legislation and policy across different scales and themes of governance, e.g., alignment of freshwater and climate change policy. It is unclear in this recommendation whether there is an expectation of central and local government jointly funding implementation of the emissions reduction plan and how this links to the recommendation regarding Vote Climate Change which consolidates funding for core activities. Given our comments in the sector-specific sections below regarding funding challenges, we suggest the Commission clarify this further in the wording of action b. “Implement funding and financing mechanisms to enable the emissions reduction plans to be implemented effectively”;
- **enabling recommendation 5, establish processes for incorporating the views of all New Zealanders.** We suggest the Commission highlights the need for a local-level mechanism that can feed into the recommended national-level mechanism.

The Path to 2035

12. Environment Canterbury fully supports:

- the **approach to locking in net zero through decarbonising sources** of long-lived gas emissions.
- the **approach to locking in net zero through growing new native forests** to create a long-lived source of carbon removals.
- the **overall path to meet the first three budgets** including long-lived emissions reductions through road transport and heat, industry and power, and the assumption of no methane reduction technology results in reliance on farm practices and reduction from landfills; and
- the **assessment and recommendation of nationally determined contribution (NDC)** given our Climate Emergency declaration which affirmed the need to limit global warming to 1.5°C.

An equitable, inclusive and well-planned climate transition

13. Environment Canterbury fully supports the recommendations that provide for an equitable, inclusive, and well-planned climate transition.

14. We emphasise the need for local transition planning and investment in appropriate technologies for different regions and communities. We also emphasise the need for promotion of energy reduction concurrent with transition to different energy sources.
15. Reducing public transport fares for targeted groups will support an inclusive and equitable transition. We know from our experiences in addressing air quality in Canterbury that households with limited means are unequally impacted by rules aimed at reducing emissions. While tax incentives are important, it is still relative to the income of the household. We would support the development of targeted assistance with a focus on low emissions transport options – electric vehicles, scooters, bikes, public transport – for households with limited means.
16. One barrier to an equitable transition is the funding mechanism to better integrate transport networks and urban areas. The current funding models are not designed to transition existing urban environments where there is little growth and little benefit to developers. While we have some districts with high growth in the region, we also have areas of slow growth with limited ratings bases. These communities will find it a challenge to fund changes.
17. The changes to the transport system will require major social change. For example, communication from central government needs to be clear and widely accessible to ensure the public understand why the change is required and what the benefits are, to reduce the likelihood of ‘work-arounds’ being developed or any unintended loopholes being exploited.

Transport

18. Environment Canterbury fully supports the recommendations for the Transport sector.
19. The advice shows strong alignment with the targets in the draft Canterbury Regional Land Transport Plan (RLTP) to reduce transport emissions in the region by 30% by 2030. We welcome partnerships which will support the achievement of this target.
20. We note that a ‘one size fits all New Zealand’ approach may miss key opportunities for Canterbury. We would support recommendations that act to support Canterbury regional and South Island opportunities and challenges. With Canterbury having some of the highest rates of private car use in New Zealand, Environment Canterbury views this sector as a major potential avenue for emissions reductions.
21. Environment Canterbury agrees with and further encourages the Commission’s high aspirations for the transport sector, but wishes to stress that funding gaps and poor coordination will be the largest barrier to achieving these. Funding from central government will be essential to support regional and local councils to achieve these outcomes.

Integrated national transport network

22. Shifting travel away from private cars to more sustainable ways to travel is one of our region’s most significant challenges. Canterbury councils are already significantly investing in mode shift – such as through public transport improvements, walking and cycling, and

travel demand management – but the opportunity now is for these investments to be increased through effective partnerships between central and local government.

23. Through the draft Regional Land Transport Plan 2021 - 2031, we are prioritising transport network investment into solutions that support mode shift and a reduction of emissions. This includes walking and cycling improvements, and public transport services and infrastructure. So far, we already have 8% of the population using active transport for their commute in our more densely populated urban areas. We are also investigating Mass Rapid Transit options for the Greater Christchurch sub-region and on-demand public transport services in our smaller urban centres.
24. The necessary reduction in emissions from the transport network will also have a flow-on effect to how we plan for our urban environments. The review of the Canterbury Regional Policy Statement – our key statutory tool influencing how our urban environments grow and change – will take this into account.
25. E-bike sales have grown massively in the last 5 years, mainly among middle- and higher-income earners. We support a potential programme where lower income earners can access cheaper, low/no emission technology to provide proper transport choice for all (such as a ‘Clean Heat’ programme subsidy to purchase an e-bike and paid off over a long time period through rates).
26. The Commission suggests throughout the report that public transport can be used as a climate change solution and recommends several potential changes to get more New Zealanders using public transport. Environment Canterbury commends the Commission for recognising this but notes that, before this can begin, a robust discussion needs to be held on how improvements to public transport are funded. Currently, central government and local government fund around three-quarters of the public transport offering in Canterbury, with fares from users contributing the remainder. To truly improve service levels and make public transport a more attractive choice, more funding is needed. A focus on reducing fares may be part of the solution but this solely concentrates on the demand side. Addressing the public transport offering on the supply side - more and better service - is also needed and will require substantial investment from central and local government sources particularly in the short-term, to attract more users. This will not be cheap and will place greater burdens on tax and rate-payers.
27. Government, through the Government Policy Statement on Land Transport, the distribution of funding from the National Land Transport Fund and the prioritisation of projects in the Regional Land Transport Plans, must ensure that the source of greater funding for public transport is identified and secured.
28. The Commission has chosen to focus on fare concessions. Fare concessions without, or at the expense of, service improvements will not necessarily help. In a recently released discussion draft on fare policy Waka Kotahi staff noted:

“Evidence indicates that investing in improving public transport services (especially frequency) is likely to have a greater impact on ridership growth than reducing fares” and “Waka Kotahi also does

not support fare-free public transport for targeted concession groups on services operating during *peak periods*" (*Draft public transport fares investment policy*)

29. Similarly, the Commission advocates for greater investment in carbon-free public transport by adopting electric or other zero carbon technologies. We would ask that the Commission and central government look to coordinating the purchasing power of New Zealand Inc to facilitate this. A national programme of new vehicle purchase may provide opportunities of scale that reduce costs and enable a faster uptake of carbon-free technology, as opposed to councils placing smaller scale, individual orders. As with the discussion on fare concessions, this will involve a re-setting of the relationship between central and local government working collectively to unlock resources at the most appropriate time and to maintain investment levels as required.
30. Environment Canterbury is continuing to work with central government and local authorities on a business case covering future public transport investment in Greater Christchurch. This business case has recommended increased investment on our current bus-based network and is considering further options for Mass Rapid Transit, including a consideration of rail. We note that, long-term, rail, and electric rail in particular, is the most energy-efficient form of passenger transport and warrants serious consideration in a transport decarbonisation strategy. It is doubly important that recommendations from the Climate Change Commission be appropriately woven into these discussions. We urge the Commission to recommend that central government maintain and strengthen its involvement in the Greater Christchurch Future Public Transport process and work in partnership to develop policies, practices and funding streams that reduce the barriers confronting users and potential users, as they, in turn, look to choose active and public transport over less desirable single user, car-based modes.

Accelerate uptake of Electric Vehicles (EVs)

31. In our draft Regional Land Transport Plan 2021 - 2031, we support the use of EVs, and acknowledge the air quality co-benefits. Reducing emissions from the light vehicle fleet will have co-benefits for air quality in our urban areas, helping to deliver on air quality targets.
32. We note that as a regional council we are reliant on central government to do more to encourage uptake of all forms of electric travel (including electric cycles and electric scooters) and see these recommendations as supporting that ambition.
33. A focus on public transport (including potential mass rapid transit) across the network would have multiple co-benefits. This includes saving energy, reducing wear and tear on our roading infrastructure, reducing congestion, improving productivity, providing employment opportunities and improving health outcomes.

Low Carbon Fuels

34. Through the draft Regional Land Transport Plan 2021 - 2031, we are also prioritising transport network investment into better solutions for the freight system. It is essential that if we increase the level of freight carried by coastal shipping or by rail that this does not result in environmental damage and increased greenhouse gas emissions. Central

government support for transitioning trucks, trains, planes, and ships to low carbon fuels is welcome.

35. Low carbon fuels will also have air quality benefits in our ports and urban areas. Heavy vehicles have a greater contribution to air pollutants than light vehicles. This would significantly reduce the emissions of nitrogen oxides, sulphur oxides and particulate matter which have known health impacts.

Heat, Industry, and Power

36. Environment Canterbury would like the Climate Change Commission advice to also include the consideration of biowaste as a viable alternative for fuel production that can be used in transport, heating, industry and power. The use of biowaste as an energy source allows for sensible recycling of waste products into a useful form, allowing sustainable fuel use for the future. This would require leadership in the technology to convert biowaste into fuels and supporting increased processing of primary materials within New Zealand, such as timber, rather than sending materials overseas to process and subsequently return to New Zealand. Small scale biowaste use in distributed systems, such as on farm to fuel vehicles and heating, also has potential to reduce the need for fossil fuels.

Reducing emissions from urban form

37. Environment Canterbury fully supports the recommendations regarding action 10, to reduce emissions from urban form.
38. We highlight the importance of planning and land-use settings to support sustainable transport options in our urban centres. We also note the need to consider existing international research on emissions reduction solutions, including nature-based solutions, through urban planning and design alongside current technologies.
39. Environment Canterbury has a key role to play in this through the Canterbury Regional Policy Statement and implementation of the National Policy Statement on Urban Development 2020 in collaboration with local councils.
40. A key challenge for Greater Christchurch is to achieve higher rates of intensification within its existing urban environment to support a more sustainable urban form. This includes more people living and working along core public transport routes, or within local neighbourhood centres where they can access more of their daily needs. If we do not support more growth within the existing urban area, Greater Christchurch will continue to experience growth in periphery locations that results in a car dependent urban system and increased freight movement to deliver goods to these locations.
41. We strongly support a coordinated approach to decision making across Government agencies and local councils regarding urban planning, design, and transport.
42. We have worked across our region to develop a strong coordinated governance and planning structure, especially relating to the work of the Canterbury Mayoral Forum and the Greater Christchurch Partnership, and are ready to strengthen our partnership with Government to deliver transformative change in our region.

43. The recommendation to reduce emissions from urban form is consistent with the current policy direction in the Canterbury Regional Policy Statement to achieve consolidated urban development, and integrated land-use and transport planning and decision-making. We note our concern that achieving this recommendation/outcome could be challenging given Policy 8 in the National Policy Statement on Urban Development which allows for consideration of significant development proposals located outside of planned urban areas where infrastructure is able to be provided. This policy could result in more development in greenfield areas that are not well-connected to a range of sustainable transport options and will therefore exacerbate private car use in Canterbury.
44. This recommendation to develop an agreed methodology for estimating the long-term emissions impacts of urban development decisions would assist councils in high growth areas in determining and understanding the climate change implications of development outside of planned urban areas and add weight to the consideration of climate change impacts in statutory processes. Draft policy guidance or direction to include in Canterbury Regional Policy Statements would also help implement this recommendation and provide direction for district plans. The review of the Canterbury Regional Policy Statement - which influences how our urban environments grow and change – will be able to support this. However, we also need to work with private developers to deliver it.

Agriculture

45. Environment Canterbury fully supports the recommendations for the Agriculture sector.
46. Our work focuses on managing agricultural impacts on water quantity and quality. We agree with the Commission that requirements to halt, and in some cases reduce, nutrient losses from farms encourages efficient nutrient management and could encourage emissions-efficient management practices.
47. We therefore think it is imperative that legislation and policy are aligned to achieve joint outcomes for emissions reduction and freshwater quality while preventing perverse outcomes. We note this links to enabling recommendation 4, central and local government working in partnership.
48. To support this alignment there is an urgent need for more research and evidence to provide more detail on the links between freshwater regulations and emissions reduction policy. This includes research to understand
 - the level of biogenic emissions reductions which can be achieved through existing freshwater policy and whether a review of national direction is needed
 - the freshwater quality improvements and emissions reductions that can be achieved through the on-farm management changes noted in the Commission's evidence report 4c
 - potential benchmarks for efficiency gains.

Therefore, we suggest the Commission notes this in time critical necessary action 4, point d, in the long-term plan for targeted research and development.

49. We see potential to enable the deployment of systems and infrastructure needed for current and alternative farming systems through the Essential Freshwater review to implement Te Mana o te Wai and the regulatory and non-regulatory changes that will be needed. However, there is a need for nationally consistent processes to support providing farmers/schemes with data on their consents/monitoring, support improving information provision and collection, and on-going management of these systems.

Forestry

50. Environment Canterbury fully supports the recommendations for the Forestry sector.
51. Environment Canterbury currently works on projects to increase permanent forests on the Canterbury Plains, including our Forest Diversity Programs and investigating public/private partnerships for forest establishment, to achieve wide-reaching forest service benefits, including biodiversity, soil stabilisation, mahinga kai, flood protection, and revenue generation.
52. We would, however, like to caution against incentivising exotic forestry at a scale that is not in the long-term interests of New Zealand. As a regional council we are particularly keen that ETS forestry rules incentivise afforestation that complements the freshwater and biodiversity outcomes that we are seeking to achieve. There needs to be increased consideration of how forestry impacts water/flow sensitive catchments, and whether local authorities are well placed to protect biodiversity values on scrubland (a term often used that diminishes the importance of the ecological values of dryland, alpine and coastal habitats) in the face of significant economic drivers to clear this land for plantation forestry. There remains considerable risk that climate mitigation objectives incentivise large-scale exotic afforestation, and it's not clear the extent to which this would be in New Zealand's long-term interests — from an environmental, economic and rural community perspective.
53. We note that there are uncertainties of the scale of land available to establish native forests in Canterbury. We advocate for an immediate national-scale mapping programme to gather the necessary spatial data to be included in the Commission's recommendations.
54. Furthermore, we note that some areas within Canterbury are easier to establish forest cover, than others (eg Banks Peninsula and Kaikōura vs. Canterbury plains). In areas unlikely to support natural regeneration, exotic afforestation is better suited to meet emissions targets, only where this will not adversely affect other environmental values such as indigenous ecosystems and biodiversity or water availability. Consideration must be given to the principle "right tree, right place, right purpose".
55. Within areas unlikely to support natural regeneration of indigenous forests due to limited/non-functioning local seed source there should be scope to establish mixed exotic/native forests to assist the succession of indigenous forests over the long term if deemed achievable through a reviewed forest management plan¹.

¹ [Mason et al.\(2013\).](#)

56. We also note that significant revising and updating of regional and district plans would be required to support the level of afforestation that is suggested.
57. We fully support the recommendation for appropriate forest management plans for permanent forests. We note central government will need to clarify who is responsible for administering the plans, monitoring progress and monitoring the potential trade-offs, including wilding pines.
58. Furthermore, we note that the Commission's recommendations require the following support services
- diligent specialist foresters providing assistance to landowners
 - access to labour and appropriately sourced plants
 - compliance and community education around the current cost associated with deforesting pre-1990 forests.
59. Environment Canterbury experience of enrichment planting of indigenous species under flood protection forests shows that the current high planting costs of native trees is a barrier to native forest establishment. However, with additional support to boost native seedling supply these costs will likely decrease. We suggest the Commission considers the need for further government funding and support for native regeneration. This includes
- Revising the One Billion Trees scheme with more funding available for indigenous nursery development, along with better funding incentives for regeneration or forest establishment.
 - Up-skilling Land Management Advisors in the Emissions Trading Scheme to understand and encourage areas which can support native regeneration².
60. We support the recommendation to encourage storage of additional carbon through small blocks of trees and vegetation. Environment Canterbury already enhances small areas of pre-1990 river berm vegetation with indigenous species enrichment planting. We note that government funding would enable these operations to expand. We also note the link with Agricultural emissions requirements as many pre-1990 native forest remnants are on farms.

Waste

61. Environment Canterbury fully supports the recommendations for the Waste sector.
62. We have a narrow focus from a legislative perspective under the Resource Management Act and most of our work is related to consent processing and Compliance, Monitoring and Enforcement (CME) of discharges of waste to air, land, and water.
63. Environment Canterbury supports the waste disposal levy. Investment and funding from the levy for legacy waste issues should be a priority and not ignored while funding is given to new projects. Contaminated land issues continue to surface and require remediation e.g.,

² [Scion \(2019\)](#).

legacy landfills, legacy farm pits, tyre piles, treated timber disposal, and will continue to pose an issue regardless of the future reductions in waste creation and emissions.

64. Recommendation 13 c) 'measuring and increasing the circularity of the economy by 2025' is extremely important. It will be critical for central government to promote a circular economy within all relevant legislation. Especially as it links to enabling recommendation 4, to make effective decisions for climate change mitigation and adaptation, including aligning the Local Government Act, the Building Act and Code, national direction under the RMA, the proposed RMA reforms, implementation of the freshwater management framework and the 30-year infrastructure plan.
65. We support the prioritising of product stewardship schemes for products with high emissions potential. At Environment Canterbury, we have funded AgRecovery for many years and have supported battery recycling and a medical waste reuse start-up to support production stewardship schemes and would like to see the schemes already in place extended and sustained.
66. We understand that product stewardship schemes require consistent volumes of waste to run and provide the longevity required to pay back the significant reuse and recycling infrastructure requirements. While product stewardship schemes are an important part of the solution, it is not clear on their impact long-term to reduce total waste volumes when consumption trends continue. Therefore, we strongly recommend product stewardship schemes be mirrored by regulation to support the reduction of waste during the design and manufacturing lifecycle stages.
67. This Commission recommends more wood is used in construction to replace steel and concrete while recommending less wood disposed to landfill. We have a longstanding issue with the disposal of Copper Chrome Arsenic treated timber and Boron treated timber. Much funding and time has been committed to find alternative wood treatment and disposal options and we are yet to see a viable commercial opportunity. Currently, all treated timber is disposed to a Class 1 landfill. Environment Canterbury also has a commitment in the Regional Policy Statement to reduce the contamination of new land so a viable and responsible disposal option or opportunities in the circular economy for treated timber will need to be found in the near future.
68. End of life disposal of tyres is a major issue for the well-being and environment of Canterbury, and a like for like increase in the number of EVs to replace fossil fuel vehicles will not reduce this issue.
69. While Tyrewise has been set up as a product stewardship scheme there is still a lack of environmentally responsible disposal options. The current options for large quantities are shredding for waste to energy fuel which has associated transport and process emissions. Other reuse options such as surfacing for playgrounds and horse arenas are inadequate to deal with the volumes of tyres produced and may have their own set of environmental trade-offs. Ultimately, the number of end-of-life tyres should be reduced at source by reducing the number of private passenger vehicles.

Multisector strategy

70. Environment Canterbury fully supports several of the recommendations and actions to create a multisector strategy, including integrating government policy making, exploring the creation of climate risk disclosure regime that covers public entities at the national and local level and aligning investments for climate outcomes.
71. Local government is required to provide information on climate change risks to Council's business under the Zero Carbon Act. There is a need for consistency, efficiency of time and resources and producing useable information for both central and local government. We suggest the Commission include the need for national guidance on assessing and disclosing organisational climate risks and that this guidance is co-developed with local government.
72. National guidance is needed to encourage local government to factor target-consistent long-term abatement cost values into policy and investment analysis and should be co-developed with local government to ensure any regime is appropriate for local government. We suggest the Commission include in the advice report the need for national guidance on the methods for factoring target-consistent long-term abatement cost values into analysis, and a recommended scope regarding the level of investment.

Conclusion

73. Environment Canterbury thanks the Commission for the opportunity to make a submission on the first package of advice. We look forward to the final report due in May 2021 and its recommendations.

For further enquiries:

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