

Canterbury Regional Council (Environment Canterbury) submission on the Ministry for the Environment's Emissions Reduction Plan discussion document, *Te hau mārohi ki anamata / Transitioning to a low-emissions and climate-resilient future: Have your say and shape the emissions reduction plan*.

1. Thank you for the opportunity to make a submission on *Te hau mārohi ki anamata / Transitioning to a low-emissions and climate-resilient future: Have your say and shape the emissions reduction plan*.
2. We welcome the release of the discussion document as a significant step on the pathway towards achieving New Zealand's climate goals. We also recognise both the enormous undertaking that it entails and the time pressure that the Government and officials are working to.

Background: Environment Canterbury and the Canterbury region

3. Canterbury Regional Council – Environment Canterbury, as the first council in New Zealand to declare a climate emergency, understands and acknowledges the 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. Environment Canterbury supports and encourages all involved with the development and implementation of proposed initiatives 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.
5. Environment Canterbury recognises that achieving New Zealand's goals to limit global warming requires a cross-sector approach. Waitaha/Canterbury's overall emissions profile is primarily driven by agriculture (66 per cent of emissions in 2018), followed by manufacturing and households (10 per cent each in 2018)¹, while in Ōtautahi/Christchurch city itself, transport is the most significant emissions contributor (at 53 per cent)². We support a just transition that delivers a fair approach across all of these.
6. We recognise that despite the greenhouse gas emission reduction frameworks that New Zealand has in place, to date our gross emissions are still increasing. Waitaha/Canterbury's emissions profile shows a gradual increase in gross emissions over the last ten years, mostly driven by agriculture. As regional leaders for

¹ National Greenhouse Gas inventory for the year ended 2019

² Christchurch City Council Christchurch Community Carbon Footprint 2016/17

Waitaha/Canterbury, we find this unacceptable and clear direction is required to turn the tide.

7. We will consult on reducing public transport fares, in particular for young people and those receiving a low income or with mobility issues, as part of our 2022/23 draft Annual Plan consultation. This fare reduction is an opportunity to support people in greater Christchurch to use low-carbon transport by removing the cost barrier for those who qualify for reduced fares.
8. As a regional council, we have a core role in delivering our region's public transport, urban development, freshwater management, integrated farm planning, monitoring contaminated land, building flood resilience, improving air quality, managing our own forestry, supporting biodiversity through habitat enhancement, and biosecurity functions. This submission reflects our experience and our position on integrating emissions mitigation across these areas.

General feedback

9. Most importantly, we recommend that the Emissions Reduction Plan moves beyond the “what” (the targets) to the “how” (the policy mechanisms that will be used to achieve them). We note the gap between the level of ambition that the discussion document lays out and the proposals that it suggests.
10. To this end, we recommend significantly more detail on the interventions that will be put in place, analysis of their costs and benefits, decisions on how they will be funded, and how various policy frameworks will be aligned to achieve climate objectives. This will deliver certainty for local government, Tiriti partners, businesses and communities.
11. Local government plays a significant role in New Zealand communities' transition to a low-emissions and climate resilient future. Therefore, we recommend developing a substantive ongoing partnership approach with local government to support development and implementation of the Emissions Reduction Plan going forward, with clear, strong, consistent direction across councils.
12. We also recommend providing interventions that will support local government to help deliver emission reductions. Examples include:
 - a. decision-making tools that integrate climate change into cost-benefit analyses – e.g., emissions impacts, and implications of future climate policies such as carbon shadow pricing
 - b. emissions reporting standards that can be tailored to local communities.
13. We also recommend developing cross-sector minimum standards for emissions – e.g., appliances, building materials, other products, housing, and waste disposal. We consider that standards, if developed in consultation with industry experts and impacted communities, will deliver tangible emissions reductions in a way that provides a level playing field.

14. We welcome the mention of the needs of rural communities within the discussion document, but we note that this is largely confined to a proposal within the Transport section. Instead, we recommend that the Emissions Reduction Plan expands this to a cross-cutting rural communities section that details how all relevant emissions mitigation policies will be tailored so that they are equitable and appropriate to a rural community context.

Transition pathway – principles for the transition

15. We support a vision that makes it clear that we need to return to living within planetary limits, reflecting our climate and biodiversity emergency declaration.
16. We support the discussion document statement to ensure that every government decision is consistent with climate goals.
17. We recommend this statement can be formulated more ambitiously by including central, local government, iwi/Māori, communities and business leader decisions to be consistent with climate goals.
18. We support an evidence-based approach.
19. We recommend the evidence-based approach extends to driving the behaviour change that's needed to reduce emissions – e.g., psychology and social science.
20. We support the principle of embracing environmental and social benefits beyond emissions reductions, and suggest broadening this to benefits from economic transformation, in particular for low-income communities.

Working with our Tiriti partners

21. We note that Iwi/Māori and local councils are already undertaking significant partnership approaches. Within Waitaha/Canterbury, successful models that could be referenced when designing mechanisms to help integrate Te Tiriti partnerships more consistently include Ngā Papatipu Rūnanga and Environment Canterbury's Tuia programme; the Greater Christchurch Partnership; Urban Growth Partnerships; and co-Governance of Te Waihora.
22. We also note the Ngāi Tahu Climate Change Strategy as an example of a successful Māori-led strategy.
23. We note that not all Mana Whenua are comfortable with the Treaty of Waitangi principles that are often used. Developing a strategy to embed Te Tiriti o Waitangi articles would be a more appropriate approach to embed Te Tiriti in the Emissions Reduction Plan.

Making an equitable transition

24. We support the level of attention afforded to equity. The transition to a low-emissions transport system for New Zealand, and particularly the greater use and application of

pricing mechanisms, has the potential to exacerbate existing inequities in access in many of our communities.

25. We suggest that the Government considers using revenue from emissions pricing to help fund development of low-emissions industries.

Government accountability and coordination

26. We support the discussion document's observation that a coordinated work programme across central government is needed to reach our climate targets.
27. We recommend that, in addition to current proposals, the Government also review and monitor successful implementation of the Emissions Reduction Plan across New Zealand's significant policy systems – including at a local government level – to assess their alignment with achieving climate change mitigation goals, in balance with other outcomes. This should include, for example:
- a. alignment and coordination of regulatory systems
 - b. mechanisms to support coordination across agencies and between central and local government; partnership with Iwi/Māori; and collaboration with local communities
 - c. funding mechanisms and decision-making frameworks (such as the National Land Transport Programme).
28. We support the acknowledgement of local government leadership in this area and support further partnerships with local government such as through Urban Growth Partnerships and new models of collaboration such as Regional Transition Partnerships.
29. We also note Environment Canterbury's experience with the Braided River Action Group as one example where siloing between agencies and local authorities has been a significant barrier in holistically managing public land for public good benefits.
30. We suggest encouraging local government to join the Carbon Neutral Government Programme could increase the use of shared methodologies, enable benchmarking and reduce inefficient spend of rate payers' money in areas where investment has already been made.

Funding and financing

31. We recommend including key Government funding mechanisms (particularly the National Land Transport Programme) in analysis of how positive climate action can be funded.
32. We note innovation is a particular area where the funding structures that are available are creating barriers to local authority investment. As innovation is considered an operational expense, councils are required to fund this through rates alone. This means it is significantly constrained in comparison to investment in

infrastructure for which, as a capital expense, councils are able to access other significant funding streams.

33. We therefore recommend looking into further seed funding for local authorities to invest in emissions reduction innovations. As an example, we note the success of the Waka Kotahi Innovating Streets fund.
34. We note that funding tools that could be employed for emissions reductions could include emissions tariffs and rebates. Examples of their possible use are in the sections below.

Research, science and innovation

35. We support MBIE's proposal for a mission-oriented approach to innovation for climate change.
36. We recommend widening the scope of this approach to encompass research and science, alongside innovation. This is because of the significant role that science and research play, both in understanding the problems of climate change, and in enabling development of solutions.
37. We recommend that research institutions, alongside Iwi/Māori and Government, play a strong role in setting priorities for mission-oriented research, science and innovation for climate change. We suggest this could be done via a joint committee of the universities of New Zealand.
38. We recommend ensuring that there are explicit protections to ensure independent and merit-based assessment of proposals against the priorities for climate change research, science and innovation.
39. We recommend assessing whether there are sufficient mechanisms in place to support development of "outside of mainstream" and/or smaller innovation initiatives.

Behavioural change fund

40. Previous feedback to the Climate Change Commission emphasised need for a large-scale public and behaviour change programme.
41. We note that behaviour change is the most critical and under recognised aspect of achieving the sought targets for the transport sector. Government must also understand better what drives choices through understanding the psychology, barriers to entry, values, norms, expectations, social movements, influencers, desired experience etc.
42. More specifically, we would support expansion of bike skills programmes (e.g. BikeReady). We suggest extension not only to cover more people, but also to support both bike and scooter share schemes (including e-versions) and/or rent to own schemes.

43. We also recommend that the proposed fund supports further research into “nudging” techniques, design features which lead or encourage users to follow the designer's preferred paths in the user's decision making (as used by marketers) to encourage behaviour change.
44. We suggest that options to support behaviour change would include:
 - a. allowing bus, bike and walking mileage rates for business travel, not just car and air travel
 - b. incentivising car sharing by adding a passenger rate
 - c. highlighting the potential to save money – once a well-functioning transport network is set up – by reducing sunk costs in car ownership.

Planning – Additional measures beyond resource management system reform

45. We recommend upskilling all planners (e.g. local government policy and land transport planners) to adapt to the more outcomes-focussed approach of the new Natural and Built Environment Act and to make emissions reduction a core component of planning considerations. This is a very significant shift from the current approach of minimising the adverse effects of proposals.
46. We want to emphasise the importance of creating a direct link between recommended actions and their emissions impact. More tools need to be available to easily estimate the emissions impact of an initiative/approach.

Circular economy

47. We have previously provided detailed feedback on relevant Climate Change Commission recommendations.
48. We note that the development of a successful circular economy is dependent on Central Government economic policy and law, and that some decisions which regional councils make are unable to achieve circular economy aspirations because of legal free trade requirements. Many of the overseas imports are far cheaper than locally produced goods, and development of a circular economy is dependent on levelling the playing field by means of new emissions tariffs or environmental tariffs on imported goods.
49. We would support initiatives that enable a “made to last and to be repaired” approach, for example, through working with local manufacturers and/or developing certification schemes. This could be tied in with labelling schemes that clearly identify New Zealand made and grown products.

Transport initiatives, targets and actions

50. We support in principle the initiatives and actions proposed for reducing transport emissions during the first budget period.
51. However, we note that there are significant challenges to achieving the targets proposed, especially considering expected population increases. These challenges

include insufficient funding, current investment and decision-making models not being fit-for-purpose, and a need for stronger coordination between central and local government.

52. We support the inclusion of a target to reduce vehicle kilometres travelled by cars and light vehicles. This will provide the additional benefit of reducing traffic congestion.
53. We consider that the Emissions Reduction Plan overemphasises the use of electric vehicles as an intervention.
54. We recommend that to support achieving this target, the Government also considers interventions that will support uptake of working from home.
55. We also note rural communities may have less scope to achieve the new target of a 20 per cent reduction in car and light vehicle kilometres travelled by 2035. For example, transitioning away from road freight would require greater resilience elsewhere in the system to ensure continuity of supplies to rural communities – e.g. potential for a dual-direction rail network and/or increased supermarket storage capacity.

Integrating land-use, urban development and transport

56. We support the discussion documents intention to better integrate land-use, urban development and transport planning, and investment to reduce transport emissions. We support the role of strategic planning and investment in lowering emissions in our urban centres by planning for more compact urban forms that support transport choice.
57. However, to ensure success, we recommend mechanisms to deliver on spatial plans and direct growth outcomes.
58. We note that delivering a quality, compact urban form requires upfront investment in infrastructure. This includes enabling local government to begin levying contributions on infrastructure 30 years in advance, and on projects where there is lesser certainty as to how, where and when the project will proceed.
59. We also note that there is a tension between reducing transport emissions and the operation of competitive land markets; where these remove the ability of plans to direct growth into locations that will support travel choice and the provision of supporting infrastructure.
60. Finally, to complement the longer-term emissions reductions that will be delivered by more integrated planning, we also recommend more active, tactical interventions such as road space reallocation to make a start on encouraging mode-shift and reducing emissions within the next three to five years. Greening our urban environments to achieve carbon sequestration and deliver on our emissions reduction targets will also support creating an environment conducive with mode shift.

Requiring transport emissions impact assessments for urban development

61. We support a move towards better understanding the impact of urban planning on transport emissions and requiring this to be a material consideration in urban planning.
62. We support requiring transport emissions impact assessments in consenting/activity approval processes for high trip-generating activities. These are not yet well defined in the international literature, and national guidance on this would be welcome. We also note that additional mechanisms will be required to achieve an urban form that reduces emissions.

Aligning transport planning and investment with emissions reduction goals

63. We recommend that any review of the role of Regional Land Transport Plans should also consider the governance of these Plans by regional transport committees and broaden their scope to include other transport modes such as rail and coastal shipping.
64. In making the transition, we recommend considering the capacity and capabilities of local authority transport staff, many of whom will need to shift from asset management to strategic transport business case design and implementation, and greater collaboration.

Encouraging mode shifts

65. The Emissions Reduction Plan proposes to implement the existing Greater Christchurch mode-shift plan. We note that this plan would deliver a reduction in vehicle kilometres travelled that falls significantly short of the proposed target of a 20 per cent reduction by 2035.
66. We support the proposed approach in the first budget period to substantially increase funding for walking and cycling improvements, and the emphasis on support for local authorities' capability to design and deliver these at speed.
67. However, we note it is important that national-scale programmes such as borrow bikes at all New Zealand public libraries and cycle lanes on our state highways also be included.
68. We support fast-tracked processes and new mechanisms to reallocate existing road space. However, we recommend that these new processes are robust enough to ensure that any impacts of the road works are within local environmental limits.
69. We also recommend that reallocation of existing road space should be accompanied by strong guidance on parking, specifically addressing how the removal of parking aligns with and delivers on higher-level outcomes. Reallocating road space and removing parking without having good public transport in place can create unintended consequences that lead to greater emissions.
70. We support the direction to investigate changes to policy and funding settings for a 'build back better' approach to renewals. Maintaining and renewing our existing

road networks forms most of our regional land transport expenditure and we need to consider new approaches.

71. We also support integrating equity into this approach. Bringing a spatial lens over transport decision making that carefully considers the locations and groups in our community with the least access to opportunities and who experience the greatest marginalisation, will enable a more just transition.

Congestion pricing and other pricing tools

72. We agree that pricing is a powerful tool to influence behaviour, and that we need more tools and better tools. However, the use and deployment of these tools needs to respond to local context to achieve its intended outcomes and avoid unintended consequences. We also think that behaviour change programmes have a significant role to play.
73. We note that pricing tools have the potential to support a range of transport outcomes, including enabling a shift to a more user-pays approach to funding road maintenance. Applying new pricing tools could allow a fairer allocation of costs, particularly for low volume, high value roads such as those used by forestry and quarrying operations.
74. We particularly support the greater use of pricing mechanisms in locations that are already well served by alternative transport modes, or in combination with investment in making alternative transport choices more attractive. Their use and application need to be considered spatially and account for local inequities in access.

Encouraging uptake of public transport

75. We support the improvement of public transport availability to reduce emissions.
76. We also support the proposal to make public transport cheaper, in particular in relation to improving access for those who the current transport system poorly serves. We note that Environment Canterbury intends to consult on reducing public transport fares, in particular for young people and those receiving a low income or with mobility issues, in the new year.
77. We recommend that the Government works with local government to provide appropriate support to reduce prices and increase accessibility of public transport.
78. We would like to see the government consider supporting the call of the Aotearoa Collective for Public Transport Equity and their Free Fares Campaign for under 25s, community service card holders and tertiary students.
79. We note evidence indicates that investing in improving public transport services (especially frequency and coverage) is likely to have an impact on growing ridership alongside levers such as reducing fares.

80. We also note that, in contrast to the discussion document, capacity is not currently a barrier to greater uptake of public transport in greater Christchurch, rather frequency and level of service are more important.
81. To this end, we support further investment in public transport infrastructure, including working with central government to progress the Public Transport Futures programme and Mass Rapid Transit business case.
82. We note that the lack of an additional source of public transport funding (other than the National Land Transport Fund) is currently the biggest barrier to expanding the frequency and coverage of our public transport networks.
83. As a local example of a successful model of increasing uptake of public transport, we note the potential of a scheme like MyWay to link adjacent suburbs and outer suburbs with the main bus routes in a city.
84. In the short term, we note that there will be a need to balance the objective of increased uptake of public transport with needs around social distancing in order to manage the risk of transmission of Covid-19.

Options for mode shifts in rural and provincial areas

85. We support the provision of more equitable travel choices to NZ's smaller provincial towns and rural areas, including by public transport such as bus or rail. Equal access to public transport is key to a just energy transition, and will stimulate provincial economies.
86. We note the discussion document specifically mentions the success of the MyWay Timaru on-demand public transport trial and indicates this as a potential model for providing more effective travel choice in smaller rural communities and provincial towns.
87. We would appreciate assistance in working with Waka Kotahi to agree to extend the current trial of MyWay until 30 June 2024. Following completion of the trial we will work with Waka Kotahi to evaluate how on-demand services become part of our standard continuous programmes for public transport.
88. We also reiterate our recommendation that the Emissions Reduction Plan extend its consideration of rural areas to ensure all relevant emissions reduction policies are appropriate for rural communities.

Low-emissions vehicles and fuels

89. We support reducing internal combustion engine emissions in the short-term, both via the Clean Car Standard and via the proposed maximum CO₂ emissions limit for individual light internal combustion engine vehicle imports.

New Zealand Rail Plan

90. We support further investment in rail and coastal shipping, in addition to that already proposed.

91. We note that achieving a 100 per cent increase in rail freight tonnage moved to/from & within Canterbury is one of three headline targets in our 2021-31 Regional Land Transport Plan and is backed by our research showing achieving greater mode shift to rail is economically and environmentally astute for the South Island. However, the current funding system and priorities of Waka Kotahi do not make it straightforward for us to achieve this goal.
92. We look forward to working further with KiwiRail, freight operators and central government to realise freight mode shift opportunities and call on government to help lift some of the barriers to re-establishing an efficient rail freight network.

New targets for maritime emissions

93. We suggest shifting the dates for the maritime emissions reduction targets to 2030 (rather than 2035) to align with International Maritime Organisation targets. New Zealand may also wish to align with the European Union targets, which are tougher.
94. Limiting these targets to new vessels does not address emissions from existing fleets, which have a long working life. We would welcome further proposals on how emissions from existing fleets will be addressed.
95. Finally, we note that the proposal to work towards net zero-carbon shipping on key trade routes by 2035 is ambiguous and more detail is needed.

Energy and industry

96. We support phasing out existing, low-and medium-temperature coal boiler installations, as proposed within new national direction under the RMA.
97. We also note that addressing coal boilers will not address emissions from natural gas, which the Energy Efficiency and Conservation Authority reports accounted for the largest proportion of greenhouse gas emissions from process heat (50 per cent in 2016, compared with 26 per cent from coal).
98. Therefore, we support proposals to disincentivise further investment in gas-fired process heat and phase out existing infrastructure in favour of low-emissions alternatives.
99. We also note the role that free industrial allocation plays in disincentivising the transition away from fossil fuels in this sector, and therefore support the Government's signalled intent to consider policy changes to industrial allocation, including to manage over-allocation.
100. We note an energy strategy may prompt changes/replacement of the National Policy Standard/National Environmental Standards on Electricity Transmission and National Policy Standard renewable energy. The relationship between an energy strategy and resource management system reform needs to be monitored.
101. We support:

- a. the development of a new combined National Policy Statement and National Environmental Standard, that is clear and directive, to enable us to begin effective reduction of greenhouse gas emissions.
 - b. the consideration of short-term effects of greenhouse gas emissions from biomass fuel use as this will not be captured by the emission factors used in carbon accounting in New Zealand and also ensuring that the emissions from biomass fuel do not exceed World Health Organisation guidelines
 - c. further clarification regarding the difference in approach to a physical discharge of greenhouse gases and regulating based on emission factors for carbon accounting.
102. We encourage the Government to explore whether biomass is best used to generate electricity or used for process heat, to ensure that World Health Organisation guidelines are not breached in this transitional option.
103. We recommend a large focus on energy efficiency and reductions in energy use – for example, co-locating industries and reviewing opportunities for capture and use of residual heat.

Building sector

104. We note that the Government is considering a wide range of measures to reduce emissions from new and existing buildings. Many of the measures exist to some extent in New Zealand and simply need to be expanded or mandated to broaden adoption.
105. We also recommend integrating resource management system reform work with the Building Act reform to drive green engineering in building design; solar panels and stormwater collection/use for example. Push for spatial planning to allow for additional wind generation.

Agricultural emissions reduction

106. We note that New Zealand's farmers and growers are facing a challenge and opportunity to achieve (and be recognised for) good outcomes across environmental, social and economic dimensions. Emissions mitigation sits alongside stewardship of freshwater, biodiversity, animal welfare – and of the farm business itself.
107. We also note that New Zealand is the only country in the world that has legislated for future inclusion of livestock emissions in an emissions pricing scheme, and that KPMG's Net Zero Readiness Index 2021 rates New Zealand as the world leader in reducing agricultural emissions.
108. New Zealand needs a holistic system that partners with farmers and growers to take actions that will achieve these outcomes. This includes resourcing for:
- a. development and dissemination of farm-ready mitigation solutions

- b. advisory support
 - c. capability and qualifications for advisors and other professionals
 - d. compliance mechanisms
 - e. guidance
 - f. assurance programmes that are suitable for domestic and overseas markets.
109. We therefore recommend that on-farm emissions measurement and management is delivered as part of a broader approach that aligns across existing mechanisms.
110. We note concern that the delivery of proposals via He Waka Eke Noa has apparently been delayed beyond the timeframes of the Emissions Reduction Plan discussion document. There is minimal comment on the Climate Change Commission's advice, despite this being one of the legal requirements of the Emissions Reduction Plan.
111. As Canterbury's regional economy is relatively exposed to agricultural emissions policy, we need certainty and innovative solutions as quickly as possible.
112. We will focus this submission on the proposals and discussion questions that have been put forward in the Emissions Reduction Plan discussion document; but we note that we look forward to receiving proposals from the He Waka Eke Noa programme that are on par with the current proposals related to transport, as is appropriate for a fair, cross-sector approach.
113. The discussion document asks for feedback on how the Government could better support and target farm advisory and extension services. We first recommend clarifying the role that local authorities will play in this area. In particular, we recommend clarifying how on-farm emissions mitigation interventions integrate with regional councils' existing role in implementing farm plans, good management practices, incentives and extension services that are core parts of achieving on-farm environmental outcomes.
114. We also note that agricultural emissions policy is the area where Environment Canterbury and other regional councils' functions and work programmes could be the most impacted by emissions budgets.
115. We support increasing delivery of extension services. We emphasise that any direction for farmers and growers to measure and manage their emissions needs to sit firmly and naturally with existing policies and have tools ready to go to back it up.
116. We also recommend a single point of decision making and leadership in developing direction for on-farm environmental management in general. Most projects are being funded in siloes, for single outcome and a single tool. It is unclear who has the authority to make decisions, both procedural and funding wise, and competing interests are still an issue.
117. To this end, we suggest emissions reporting either be part of freshwater farm plans (e.g., as a model more similar to the Environmental Management System plans); or

as a separate tool which integrates into the wider ecosystem of tools and data sets with catchment context and investment planning tools linking into that. The aim should be to allow farmers to farm and have their farming activities by default generate the required regulatory reporting and planning.

118. We note the mention of the rollout of integrated farm planning as decreasing producers' compliance burden. While we agree that integrated farm planning is needed, we want to emphasise that this is a single tool. We recommend developing additional methodology and processes for continuous alignment of the various new initiatives hitting farmers in the coming years.
119. We support development of agricultural innovations, including sequestering carbon in the soil, through improved farming practices and natural soil-building processes.
120. We recommend that the Government reviews relevant policy and regulatory systems to identify any further opportunities to support improved access to on-farm mitigation technologies. We also note that a reduction in fossil fuel carbon emissions through reducing the use of synthetic nitrogen fertiliser, imported phosphate and palm kernel expeller feed (PKE) could also support an improvement in water quality outcomes.

Reducing waste

121. We welcome the attention given to mitigating organic waste. We also recommend including interventions that reduce industrial waste.
122. We recommend against large waste-to-energy schemes that rely on long-term waste streams and therefore provide no incentive for waste reduction. For example, to ensure energy from waste plants' long-term security, waste contracts might be required for up to 25 years. Instead, we encourage capture and use of emissions that are relatively unavoidable (landfill gas etc).
123. We note farm pits will be difficult to manage, especially if alternative options are not developed. Compliance monitoring and enforcement of these is also likely to be challenging.
124. We also suggest banning disposal of waste streams to landfill where a product stewardship scheme has been implemented.
125. We suggest that the Government consider incentivisation options for on-site processing of green waste, and note that technologies for this process have already been developed.

F-gases

126. We note that the discussion document lays out interventions that focus on limiting F-gases from new refrigeration units. We also recommend interventions that mitigate emissions from New Zealand's existing units – e.g. setting standards for end-of-life disposal.

Determining the role of forestry in the NZ Emissions Trading Scheme (NZ ETS)

127. We agree that forestry should be used to provide a buffer if there is a lack in confidence in other sector delivery and the forests are managed sustainably with a heavy focus on wider values in particular biodiversity. Forest carbon stock is easily measurable and will be useful for meeting clear targets.
128. We note that New Zealand does need exotic forest planting in the short term to meet the emissions targets. This is well explored and is a recommended avenue from the Climate Change Commission. However, the policy settings should transition to favouring native planting, particularly through natural regeneration.

Improving long-term sequestration

129. We recommend that the Government encourage continuous cover forest management of all forests, including regenerated or planted native forests, to maintain soil conservation and biodiversity values.
130. We also support transitioning exotic to indigenous forests for long-term sequestration, if planted in environments suitable for this process to occur under the correct management. This should be research driven. This can be a cost-effective approach through the ETS to meet carbon and biodiversity goals if managed correctly.
131. We recommend that the Government considers how monitoring (and incentivisation) will take place for forests that are not eligible for the Emissions Trading Scheme.
132. We agree with the discussion document's observation that pest management will be central to ensuring that forest sequestration is maintained over time in new, existing and regenerating forests.
133. We note that a significant step change would be needed for browsing pest control to deliver its full potential for emissions mitigation and other co-benefits.
134. Therefore, Environment Canterbury recommends the following:
- a. first and foremost, a significant, nationwide and ongoing increase in funding to support the necessary operational staff capacity and capability at scale
 - b. supporting pest control organisations (including local government) to build relationships with private landowners and mana whenua, and otherwise support delivery of pest control on public and private land
 - c. a strategic approach that enables coordination of management programmes not only across DOC, but also Tiriti/Treaty partners and mana whenua; community organisations; LINZ; landowners; central and local government; and researchers
 - d. a review of relevant regulatory frameworks to ensure that this approach is enabled and supported

- e. ensuring that this approach also extends to ecosystems beyond forests, in particular tussock grassland and scrubland.

135. Environment Canterbury notes the successful organisation of the National Wallaby Eradication Programme in Canterbury is an example of the benefits that can be delivered through funding, landowner support and strategic coordination.

Managing forests to achieve positive outcomes and mitigate risks

136. We note that in Waitaha/Canterbury there is already significant control of location and scale of exotic forest, e.g., through low use water catchments and Te Pātaka-o-Rākaihautū/Banks Peninsula exotic afforestation restrictions. We want to emphasise the importance of careful selection of where exotic forestry is established as it can cause negative effects such as loss of native biodiversity.
137. We suggest that regulation would be useful as currently permanent exotic forests are outside of the National Environmental Standard for Plantation Forestry. Large-scale investors are establishing exotic permanent forests with the intention of transitioning these to native forest with limited professional guidance or knowledge as to how to do this successfully.
138. We recommend that the Government ensures the Ministry for Primary Industries has significant focus in the research and development of transitioning to exotic to native forestry, as this will come with significant risks if not managed correctly.
139. We recommend adding a permanent forest section into the National Environmental Standard for Plantation Forestry that builds on research and development in this space from Ministry for Primary Industries.
140. We recommend that investigating options to manage the environmental effects of forests should include national direction to support fire hazard management, as climate change effects will make fires more likely and more extreme. Careful species selection, location and management of forests will increase cloud formation and rainfall, and reduce erosion.
141. We suggest that there is also an opportunity for DOC and LINZ to look at the Crown and conservation estate and assess whether there is land that they cannot afford to manage that could be leased for forestry purposes. This must focus on the right tree in the right place, and not exacerbate wilding risk or dry up water short catchments.

Establishing sustainable land-use models, including native afforestation

142. We support the Government's intention to deliver a broader package of changes to increase the feasibility of native afforestation.
143. Furthermore, we recommend that this package is completed more quickly than the stated timeframe of delivery at the end of 2023.
144. We recommend that the government helps to support native afforestation by modifying the Emissions Trading Scheme to:

- a. recognise the additional benefits (e.g., biodiversity) that native afforestation provides, in comparison to exotic afforestation
 - b. remove the hurdles involved in registering naturally regenerating native forest
 - c. reduce/write off costs for native forests
 - d. make this land use decision low risk for investors or land managers. Currently the process is tedious and high risk which is seeing landowners clear this land and replant with exotic crops.
145. We also recommend finding the means to incentivise on-farm carbon sinks that are not currently eligible within the ETS. Examples include:
- a. retirement of marginal farmland to allow natural regeneration of native ecosystems
 - b. woody vegetation, peatlands and wetlands
 - c. mixed exotic and native plantings, shelter belts, silviculture and fruit and nut trees.
146. We suggest the following as options for alternative incentives:
- a. increase Central Govt funding to biodiversity protection organisations
 - b. offer income tax and/or rates rebates
 - c. offer land use swaps – e.g., allow small subdivisions in exchange for the protection/establishment of large forests.
147. We support the retirement of marginal farmland to allow natural regeneration of native ecosystems. This would be supported by finding other means to incentivise this process. Currently, landowners with regenerating native forest are not highly valued or eligible within the Emissions Trading Scheme and therefore can be pressured to clear and plant with often exotic forestry to make financial requirements work.
148. We strongly support the Banks Peninsula Native Forest/Climate Change group's submission which clearly outlines the factors which need to change in order to effectively incentivise the regeneration of native vegetation and planting of native forestry.

Conclusion

149. Environment Canterbury thanks the Ministry for the Environment for the opportunity to make a submission on the Emissions Reduction Plan discussion document. We look forward to participating in further consultations as New Zealand's climate mitigation work programme is further developed, and to the release of the Emissions Reduction Plan in May 2022.

For further enquiries:



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