



**National Council of
Women of New Zealand**

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Wahine O Aotearoa

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**Submission to the New Zealand Climate Change Programme
on the Climate Change Consultation Paper - Stage 1**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 43 nationally organised societies. It has 35 branches spread throughout the country to which women from some 150 societies are affiliated.

NCWNZ has a history of interest in climate change dating back over a decade. This has been demonstrated both in policy passed at national meetings and in submissions written over this period of time. More recent submissions include those made on Climate Change Indicators for the Ministry for the Environment Environmental Performance Indicator Programme in 1998, and in 2001 on the Draft Energy and Conservation Strategy, and the Inquiry into the role of Local Government in meeting New Zealand's climate change target. This submission is written on behalf of the Environment Standing Committee, whose members attended public consultation meetings in several centres as well as reading and commenting on the literature provided.

Question 1 What are your views on the Government case for ratification?

NCWNZ is fully supportive of ratification of the Kyoto Protocol and agreed unanimously to this at a national meeting in October 2001. It is heartening to see that there is a defined timeline and process for this to occur. NCWNZ membership urges ratification of the Protocol and takes this opportunity to encourage such commitment. New Zealand has led the world in many areas and this is another occasion where responsible leadership for the good of the wider community is needed. The consequences of not doing anything are potentially so catastrophic that to be limited by short term economic considerations would be foolhardy.

Question 2 What are your views on the assessment of the issues relating to ratification?

The assessment of the issues seems to be covered well. It is explained in clear language that is easy to understand and appears to give a good balance.

Question 3 Can you think of any other economic opportunities that may be connected with climate change?

The list given on p16 gives a wide range of economic opportunities but in little detail so that it is difficult to know whether all aspects have been considered. While the emphasis is on how we might gain economically from climate change, there appears to be little consideration given to the probable costs. The environmental considerations are neglected in the enthusiasm for the perceived economic gains, but these should be the most important. Economic benefits need to be the result of carefully thought out environmental gains.





Question 4 What other issues or further information do you think the government should consider?

NCWNZ brings its concerns in two major areas. First, in transportation. There is no mention of the advantages in terms of emissions of rail freight transport compared with road transport, an economic opportunity which would have benefits in other ways also. The problem of the relationship between urban transportation and city planning is a similar problem. The way New Zealand's urban centres have been engineered encourages the use of private rather than public transport, and local governments find it easier to sink money into road construction rather than building up public transport networks. Towns and cities are encouraged to sprawl outwards rather than build more densely, and coupled with the low prices for imported vehicles there is no disincentive to use private cars. Rearranging how towns are planned and built, and the lives of the individuals within them will be a major difficulty in implementing any large reduction in greenhouse gas emissions. A start could be made in the provision of bus and cycle ways. This would benefit not just the environment but also individuals – the Palmerston North Green Bike Trust is an example of what is possible.

NCWNZ's second area of concern is in the use of alternative fuels. There are economic opportunities in the promotion and instillation of such systems into private dwellings and small businesses. At present they are expensive, and with the high line charges for both gas and electricity there is no incentive to cut down on consumption. Here is often a willingness from citizens to make a change if the incentives are strong and the process is made easy.

Question 5 Do you have any comments on specific aspects of the proposed Climate Protection Bill.

Part 1 Legislation on ratification?

NCWNZ supports the direction of the proposed legislation.

Question 6 Who should take responsibility for New Zealand's emissions management task? The Government, the private sector, or a mix of the two?

NCWNZ considers that government needs to control the process, although sector bodies could be given responsibility for seeing that it happens in their field. Voluntary agreements between the government and major emitters are too easy to flout and NCWNZ does not support such agreements. Internationally, non-binding and voluntary agreements to reduce emissions have not worked, and there is no indication that compliance would be greater within New Zealand. The Crown should be the body to investigate and handle the domestic emissions trading regime for the National registry and the National inventory as on p20. While NCWNZ sees the need for an inventory, we expect that the data is used to progress environmental goals rather than the collection being an end in itself.

Question 7 If the private sector takes responsibility, how do we divide this responsibility between sectors? Where does the Government take responsibility, how much should it take? Should the Government set aside a reserve of emission units to reduce possible liabilities at the end of the commitment period? If so, in what circumstances?

Overall responsibility should rest with Government, but there will need to be as much co-operation as possible with business. The private sector will also need to act responsibly, including fronting up if their failure to meet the challenge means that extra credits have to be purchased. Conversely,



they should be rewarded for under-use. Very few private sector balance sheets incorporate an environmental bottom line and a more widespread inclusion of this accounting practise would enable businesses to see more clearly where they are making a positive environmental contribution or where changes can be made.

In answering both questions 6 and 7 NCWNZ is influenced most by the need for environmental integrity – while New Zealand has the image of “clean and green” the reality is often quite different. We need to work hard to ensure that our words and actions match, from Government through to individuals. New Zealand can act as a positive example to other nations but only if there is an honest and integrated approach to international and domestic environmental problems.

Question 8 Keeping in mind the measures that the Government has already announced or is developing, which of the proposed market-based policy instruments do you think are appropriate, and in which sectors or circumstances?

- a) Government retaining full responsibility for emissions. This could leave general taxpayers with liability for the failure of others to meet their targets when they have no way of influencing how others do things.
- b) Charges on all emissions or activities leading to emissions. Such charges are going to be necessary and will need careful calculation to ensure fairness.
- c) Emissions trading. Initial allocation should be free and based on demonstrable need, rather than by auction. An auction scenario would make it easy for large concerns with large financial backing to buy up all the allocation and leave out smaller emitters. The buying and selling of units would then become a money-making exercise on its own, which would also result in equity concerns. NCWNZ is opposed to any inequitable distribution regime.
- d) Levies/rebates. These provide mechanisms for spreading costs, as is done in many areas already, and could be a way of producing funds for research into further ways of mitigating emissions. An example of this is the work currently being undertaken by Landcare into the possibility of soil being a carbon sink. NCWNZ supports the use of these mechanisms to encourage both individuals and businesses to contribute to reducing environmental impacts.
- e) Project-based initiatives. NCWNZ favours rewarding projects aimed at reducing emissions.

Question 9 Should market-based policies be implemented prior to the commitment period?

Measures should begin before 2008. A gradual lead-in is likely to be less keenly felt by giving people time to make changes in their business patterns and lifestyles. Similarly there is a need for certainty – the policies developed over the next few years should not be liable to change at the whim of whichever government is in power. This issue is too critical for the future to be at the mercy of party politics.

NCWNZ considers that project-based initiatives and levies/rebates could be implemented prior to the commitment period.

**Question 10 What transition arrangements might be needed for different sectors?**

NCWNZ has no comment on this matter.

Question 11 What elements are necessary for a system to manage forest sinks?

Sinks on forests planted on Crown land should belong to the government; those on private land planted by private enterprise should be credited to whoever was involved as an incentive for them. Similarly, debits for harvest or removal should accrue to the agency responsible. There is a danger in placing too much reliance on sinks. There is a limit to the land available for planting new forests and, like forestry for nutrient removal, there is a conflict between growing trees to maximise carbon uptake, where the need is for maximum leaf area, and growth for quality timber, where pruning removes leaf area. At all times any trees harvested should be replaced by new plantings.

Question 12 Should the Government seek to use the provisions of article 3.4 (additional sink activities) of the Protocol?

The exclusion of forest growing before 1990 has the potential to result in an undesirable pattern of cutting old forest which doesn't count for carbon credits and replacing it by newly planted forest which does count. This would be a very retrograde move in terms of environmental management. While the information on carbon uptake is not available it may be possible to fund research into ways of estimating the data. This would be a difficult problem and one that may not be cost-effective to solve, particularly with the need to fund research on the mitigation of current emissions and the prevention of future emissions. Such funding decisions would be the responsibility of Government, taking into account the wider interests of the environment.

NCWNZ thanks the New Zealand Climate Change Programme for the opportunity to submit at this first stage of an on-going process, and looks forward to the later consultation. NCWNZ commends the extensive consultation undertaken to date using a range of methods and the opportunity this has given for participation in the democratic process for interested citizens.

Barbara Glenie
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