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S21.04

Submission to He Pou a Rangi Climate Change Commission on the 2021 Draft Advice for Consultation

Introduction

- 0.1. The National Council of Women of New Zealand (NCWNZ) is an umbrella group representing over 200 organisations affiliated at either national level or to one of our 15 branches. In addition, about 450 people are individual members. Collectively our reach is over 450,000 with many of our membership organisations representing all genders. NCWNZ's vision is a gender equal New Zealand and research¹ shows we will be better off socially, environmentally and economically if we are gender equal. Through research, discussion, and action, NCWNZ in partnership with others, seeks to realise its vision of gender equality because it is a basic human right.
- 0.2. This submission to the Climate Change Commission 2021 Draft Advice (the Draft Advice), has been prepared by the NCWNZ Standing Committee for Climate Change and the Environment. It also draws from several decades of NCWNZ policy² and submissions³ on issues that have been endorsed by the membership of NCWNZ. A recent policy⁴ advocates for a net zero carbon future for New Zealand and supports the imperative of building resilience to the effects of climate change, disaster risk and environmental challenges. A second recent policy⁵ supports the UN Sustainable Development Goals (SDGs)⁶. A third recent policy⁷ commits NCWNZ to honouring the rights and obligations articulated in Te Tiriti o Waitangi and the Treaty of Waitangi as the founding documents of Aotearoa.
- 0.3. NCWNZ supports the purpose of the Draft Advice, as far as it goes. It establishes important drivers that can lead Aotearoa New Zealand's climate change philosophy and action to meet the goals of the Paris Accord⁸. It does fall short however in the conservative approach taken. Its

¹ <https://www.ncwnz.org.nz/>

² NCWNZ. 2012. 115 years of resolution.

³ <https://www.ncwnz.org.nz/submissions>

⁴ NCWNZ. 2018. Appendix "D": Resolutions of National Meetings 2011-2018. 7.13.6.

⁵ Ibid 11.13.4

⁶ United Nations. Department of Economic and Social Affairs. Sustainable Development. Transforming our world: the 2030 agenda for sustainable development. <https://sdgs.un.org/2030agenda>

⁷ NCWNZ. 2018. Appendix "D": Resolutions of National Meetings 2011-2018. 2.11.13

⁸ United Nations Climate Change. The Paris Agreement. <https://unfccc.int/process-and-meetings/the-paris-agreement/the-paris-agreement>

drivers do not provide for what NCWNZ believes to be the necessary speed required to address the rapidly advancing impacts of climate change on all aspects of life both locally and globally.

1. NCWNZ's big thing

- 1.1. The National Council of Women knows that climate change impacts can exacerbate existing gender inequalities, in relation to employment and income, family responsibilities including food, water and fuel, and health. In some situations, it also contributes to conflict and violence against women. Neglecting to mention gender in the report (and only one mention in all of the chapters of evidence) ignores the fact that women often face higher risks in natural hazard responses and face differential impacts in climate-critical areas such as transport, employment, and housing.
- 1.2. It also fails to recognise the demonstrated efficacy of gender-balanced decision-making structures in their capacity to impact on climate-friendly outcomes. This has implications for New Zealand's national and international policies and its official development assistance (ODA).
- 1.3. Further, indigenous women have long been leaders in environmental conservation and stewards of natural resources in areas of both mitigation and adaptation but are often not part of decision-making processes. This has been a relevant discussion since 18 May 1893 with the address to the Kotahitanga Parliament done by Meri Te Tai Mangakāhia about the rights to be engaged with, in political decision making as landowners.
- 1.4. **We recommend** that the report takes an intersectional approach acknowledging the differential impacts of climate across all areas of inequality including diverse genders, ethnicity, age, disability, and others. Achieving climate justice is indivisible from achieving an equitable Aotearoa New Zealand.
- 1.5. **We recommend** that the plan acknowledge the existing indigenous knowledge and wisdom in addressing climate change that is held in Aotearoa. There is a missed opportunity to engage fully with mātauranga Māori and the solutions it offers to address the climate crisis. It is important not only to have a stand-alone chapter specific to perspectives from tāngata whenua, as outlined in chapter 6, but a tikanga and mātauranga lens, along with a gender lens should be used to strengthen and appropriately resource all other areas of the work that have been designed. The presence of this is currently not visible or obvious.

2. Six big issues

2.1. The pace of change

Big issues question 1. Do you agree that the emissions budgets we have proposed would put Aotearoa on course to meet the 2050 emissions targets?

2.1.1. Strongly Disagree.

2.1.2. We agree with the statement made in the report that current policy settings do not put Aotearoa on track to meet commitments in the Zero Carbon Act but believe that the pace of change proposed is not rapid enough. Emissions budgets proposed are too conservative and at the lower end of the minimum required to meet 2050 commitments.

2.1.3. In 2001, NCWNZ submitted to the "Inquiry into the Role of Local Government in meeting NZ's Climate Change Target". Since that time, we have made a further 13 submissions on

this topic, culminating in the submission to the Environment Select Committee on the “Climate Change Response (Zero Carbon) Amendment Bill Government Bill 136-1 in 2019.

- 2.1.4. Members have a long record of interest in this important area of concern and have recognised this not only in submissions but also in discussion and approval of policies especially as climate change impacts pertain to women in their daily lives and with a particular regard to the Pacific. This was evidenced in the presentation by NCWNZ of a remit to the International Council of Women General Assembly of 2006 urging nations to prepare for the likely growth in numbers of Climate refugees and the need to prepare for this. This was seconded by NCW Samoa and passed unanimously.
- 2.1.5. NCWNZ has been attempting to get positive action in response to the looming problem of climate change for 20 years and we are dismayed, alarmed, and very concerned that there has been so little action. There is such a short time now when it is still possible to make positive change for a better future. Before this decade is out it will be too late and the world will be inevitably on track for significant temperature rise, accompanied by huge disruption to planetary systems and all life dependent on those. **NCWNZ urges strongly** that the pace of change be increased to avoid such disastrous outcomes.

2.2. Future generations

Big issues question 2. Do you agree we have struck a fair balance between requiring the current generation to act, and leaving future generations to do more work to meet the 2050 target and beyond?

2.2.1. Disagree.

- 2.2.2. We need to focus on a Just Transition which fairly considers the burden on future generations, reflecting our responsibility as a high-income nation and the proportional size of our carbon footprint, along with responsibility for our contribution to regional and global emissions and New Zealand’s commitments to the Pacific, The Paris Accord, and the Sustainable Development Goals (SDGs).
- 2.2.3. The concept of Just Transition applies within and across generations. It is about partnership between government, Māori, business, and communities to think about the pathways that will transform the economy to one of low emissions while understanding how the transition might impact on communities, and regions, and how these might be managed in a just and inclusive way. Even in times of massive corporate change or systemic regional change it is possible to take a people first approach to achieve a just solution for all the people involved that ensures everyone’s lives have continuity and that their wellbeing is maintained through the transition.
- 2.2.4. Those of us who are adults now must take responsibility for fixing the mess that has resulted from our actions and decisions, and those of previous generations. We should not leave this to our children and grandchildren. Intergenerational accountability should be an integral part of planning and action for a multigenerational solution. The concept of Just Transition should be applied across generations and also to limit the social and economic disparities.

- 2.2.5. **We recommend** that policy lessons are drawn from a model such as Kate Raworth's Doughnut Economics⁹, and its envisaging from a Te Ao Māori perspective by Teina Boasa-Dean¹⁰, where both costs and gains can be spread more widely across current New Zealanders now, and those to come, intra- and inter-generationally.
- 2.2.6. We agree with the aim to shape the report by tikanga values of manaakitanga, tikanga, whanaungatanga and kotahitanga, but there is limited evidence in the report of how these have impacted suggested recommendations. We need to ensure that kaitiakitanga is exercised with respect to current and future generations. We must also acknowledge that to exercise these values is to first and foremost come from a paradigm from within Te Ao Māori and a Māori worldview (tāngata whenua and tāngata tiriti) to be inclusive of diverse cultural communities in our nation. Our recommendations come not from a place of authority but a place of understanding that as our knowledge of this grows so does our awareness of the essential integration of mātauranga within this work.
- 2.2.7. **We recommend** prioritising a Te Tiriti focus (p.80) rather than 'giving effect to the Treaty principles' (p.175). We agree that 'partnership with iwi/Māori at every stage of the policy development process will be critical' (p.104). We agree with a focus on addressing barriers, pricing to influence investments and choices and investment to spur innovation and system transformation' (p.105); however, the actions have little reference to indigenous innovation in relation to any of the specific areas ie transport, renewable energy, energy efficiency, agriculture. For example, enabling recommendation 3 provides for a 'plan to partner with iwi/Māori' focusing on removing barriers and increasing access to information, technology, employment etc. in addition to enabling rangatiratanga and kaitiakitanga; however it doesn't refer to the creation of opportunities for sharing of indigenous knowledge to contribute to formulating solutions. (p.41).
- 2.2.8. **We recommend** fully engaging with Indigenous knowledge as solutions. There is an emphasis on ensuring that historical injustices are not compounded, which is critical, but greater recognition is needed of the value and solutions iwi can bring to the discussion as full partners. There are examples included in Evidence Chapter 6: Perspectives from Tangata Whenua, but this knowledge and practice are not fully reflected. Māori need to be sitting front and centre at the decision-making table - not a plan to do so. It is not time to be conservative in our approach to transformational change and decision making; it is a time to be proactive within a dual process of decision making (that includes equitable devolution of resources).
- 2.2.9. We strongly support the statement that 'all things are connected: the people, the land, the atmosphere, the oceans. This connectivity – material and non-material – is central to Te Ao Māori (p.79) and the principles in 5.2 (p.80), including a focus on intergenerational equity. There is a brief mention of the links between afforestation and improved biodiversity, water quality, soil health (p.100), but not enough discussion of the intersections between these

⁹ Raworth K. 2018. Doughnut economics: seven ways to think like a 21st-century economist. Cornerstone.

¹⁰ Boasa-Dean T. 2020. An Indigenous View on Doughnut Economics from New Zealand.

<https://www.projectmoonshot.city/post/an-indigenous-view-on-doughnut-economics-from-new-zealand>

dimensions. There are a number of great examples of working differently to achieve increases in biodiversity outcomes for Aotearoa, for example the Hauraki Forum in Auckland¹¹, and the Kotahitanga mō Te Taiao work in Te Taihu and West Coast.

2.2.10. Co-benefits on health are mentioned only briefly p,80, and lessening the integrated drivers of COVID and similar pandemics. The report does not sufficiently recognise the links between emissions as part of climate change, and the resulting impact on land use, water, and wildlife, and in combination with urbanisation and population growth, the impact on health and in particular pandemics-SARS, bird flu, Covid-19. Plans must integrate these concerns.

2.2.11. **We recommend** greater acknowledgement of the biodiversity crisis in considering how everything is connected including the linked drivers of Covid-19¹².

2.2.12. We agree that it is important that climate change is considered in the development of all new policies, regulations and fiscal protocol (p.126) at national, regional and local levels, and facilitating opportunities for iwi Māori to participation in ownership of infrastructure or involvement in project that align with iwi Māori aspirations...’ (p.127). **We recommend** prioritising co-design principles or embedding co-governance arrangements.

2.3. Our contribution

Big issues 3. Do you agree with the changes we have suggested to make the NDC compatible with the 1.5°C goal?

2.3.1. Disagree.

2.3.2. We agree with the statement in the report that the first NDC is not compatible with Aotearoa making a contribution to global efforts under the Paris Agreement to limit warming to 1.5°C above pre-industrial levels. However, the changes proposed must be more ambitious still in order to be compatible with the 1.5° goal.

2.3.3. Aotearoa New Zealand has responsibilities globally, and to the Pacific region in particular to commit to our ‘fair share’ of the 2030 target in our NDCs, reflecting our contribution globally to climate change and commitment to the Sustainable Development Goals. This would make our contribution far greater than reducing emissions to 30% below 2005 levels by 2030.

2.3.4. Our Pacific neighbours are on the frontlines of climate change and, like New Zealand’s tangata whenua, also play a significant role as stewards of natural resources and the region’s biodiversity. Indigenous women’s extensive skills and knowledge in natural resource management must also be valued in developing adaptation strategies. For example, results from a 2017 workshop in Palau facilitated by the Nature Conservancy identified the traditional knowledge to manage droughts, erosion, changes in crop yields

¹¹ Hauraki Gulf Forum. 2020. State of our Gulf 2020: Hauraki Gulf / Tikapa Moana / Te Moananui-ā-Toi State of the Environment Report 2020. <https://www.aucklandcouncil.govt.nz/about-auckland-council/how-auckland-council-works/harbour-forums/docsstateofgulf/state-gulf-full-report.pdf>

¹² See the Global Virus Network, of which Australia and a number of countries and centres of excellence are members but Aotearoa New Zealand is not www.gvn.org

and innovative local-scale adaptation strategies. We have both a responsibility and an obligation to work with Pacific leaders in developing and implementing solutions to climate change. Aotearoa cannot do this alone. Thought leadership, expertise, and partnerships with the likes of The Nature Conservancy¹³ is essential if we are going to provide solutions for Aotearoa and internationally.

2.3.5. Therefore, in addition, **we recommend** that climate finance supports those communities at the frontlines of climate change, particularly Pacific Island nations.

2.4. Role and type of forests

Big issues 4. Do you agree with our approach to meet the 2050 target that prioritises growing new native forests to provide a long-term store of carbon?

2.4.1. Strongly agree.

2.4.2 Native forestry supports healthier ecosystems, native habitats and prevents biodiversity loss; we must respect sovereignty of mana whenua to manage land. Iwi-led examples include the work being led by ecological innovators like Charmaine Bailie (Ngāti Whatua o Kaipara) which sees native forest regeneration not only occurring in remote locals like Motutapu Island (on behalf of iwi, Ngai Tai ki Tāmaki), but also in suburb Auckland with communities of volunteers <https://devonportflagstaff.co.nz/volunteers-show-the-way-to-greener-future/> and the Auckland CBD in areas such as Silo Park and the waterfront. Iwi and community groups and organisations across Tāmaki Makaurau are well aware of the needs to sustain rural, urban and CBD native forestation, such as Kaipātiki Project: <https://kaipatiki.org.nz/about-us/our-nurseries/>. This work is not only about the whenua it is also about the people who take action and the investment that occurs to continue the supply for the demand of native forests (and all that come with this including for our waterways, bird life and native species across flora and fauna). **We recommend** that a panel of experts be drawn from community, iwi and government to pull together strategies to implement climate action related to native forestry.

2.5. Policy priorities to reduce emissions

Big issues 5. What are the most urgent policy interventions needed to help meet our emissions budgets? (Select all that apply)

2.5.1. All three interventions apply:

- Action to address barriers
- Pricing to influence investments and choices
- Investment to spur innovation and system transformation.

2.5.2. Agriculture is the largest source of biogenic methane. We agree with the importance of 'changing land use to lower emissions activities such as horticulture' (p.174). However, the plan reflects minor changes to the status quo, rather than radical evidence-based rethinking of how we produce food, creating long-term change which will also increase health and

¹³ <https://www.nature.org/en-us/about-us/where-we-work/asia-pacific/new-zealand>

wellbeing, safeguard food security and eradicate poverty. This is what is urgently required to address the climate crisis. The report reflects a reliance on new technologies not yet in existence and increased communication through technology to provide data to farmers and decision makers. There is no reference to regenerative farming or innovative indigenous food and fibre products.

2.5.3. **We recommend** that regenerative farming should be systemically supported through education, incentives, and regulations as part of an integrated strategy. A number of farmers are already working in this area and sharing their knowledge with others. For example, Wakatū Incorporated has a regenerative farming model that they are implementing as part of their 500-year intergenerational plan¹⁴ (with CEO of Wakatū Inc, Kerensa Johnson a contributor to chapter 6). There are many additional examples of innovative indigenous practices with a myriad of native taonga species e.g. kānuka (example of work being done to build an iwi-led kānuka processing facility and rongoa forest is currently being created by iwi, Ngāti Kuia)¹⁵, and non-native plant species e.g. hemp¹⁶.

2.5.4. Energy

2.5.5. The increase in the use of coal resulting from stopping extraction of oil and gas means that other options are urgent. **We recommend** providing incentives for systems other than that of profit driven line companies.

2.5.6. We agree it is important to prioritise assistance to help those on lower incomes with the upfront cost for energy efficiency improvements.

2.5.5. Transport

2.5.6. We welcome the policy of a fixed date for no more ICE vehicles but recommend that policy should prioritise incentivising use of E-vehicles alongside resolving battery disposal issues, for example through subsidies and reduced fees.

2.5.7. The report acknowledges the importance of addressing diverse barriers for low-income households, older people, disabled people, Māori and Pasifika households and young people, but does not mention gender differences in transport needs, despite the evidence of different usage patterns and transport needs of men and women. **We recommend** that all new transport policies to increase climate-friendly transport must include consideration of gender.

2.5.8. We agree that well-designed urban planning is required. However, with respect to housing and community building the report underestimates the role the construction industry can play in reducing the carbon footprint of its developments. The use of New Zealand-grown

¹⁴ Flaws B. 2020. Māori company Kono embraces regenerative agriculture as part of 500 year vision. <https://www.stuff.co.nz/business/farming/122241717/mori-company-kono-embraces-regenerative-agriculture-as-part-of-500-year-vision>

¹⁵ Tabuteau F. 2020. Over \$53m for Top of the South projects. <https://www.beehive.govt.nz/release/over-53m-top-south-projects>

¹⁶ <https://hikurangi.enterprises/ventures/hemp-marijuana-kenaf/hikurangi-hemp/>

and processed plantation timber should be prioritised for the construction industry to replace steel and concrete, known for emissions. Timber construction is known for its high-quality performance globally and for its low lifecycle costs. In assessing short term financial costs and profitability of a development the cost-benefit of longer-term investment/life cycle outcomes should be factored. **We recommend** that the Commission encourage the long-term benefits of building a thriving timber industry for construction, to support a sustainable construction industry and wider global economy.

- 2.5.9. The report should ensure policy that oversees the implementation of other statutes that enable urban development, to provide for consistency with climate change policy and implementation. For example, the Urban Development Act 2020 establishes criteria that are not consistent with reductions in carbon emissions. This Act does not adequately address the sustainable design, construction and performance of new development that supports low carbon communities and better provides for health and wellbeing of people and the environment. **We recommend** an all- of-government-approach across all sectors including local government, is essential and the Climate Change Commission should take the lead.

2.5.10. Waste

- 2.5.11. There is insufficient priority given to the circular economy, i.e. creating less waste and holding producers to account. We agree that product stewardship is critical, but ensuring that ‘manufacturers, importers and retailers provide options for consumer and communities to reuse, recycle or appropriately dispose of products’ (p. 124) does not go far enough and puts responsibility on the consumer. It is time to end planned obsolescence. **We recommend** that ‘measuring and increasing the circularity of the economy by 2025’ (p.125) needs stronger emphasis, regulation and incentives as part of an integrated strategy.
- 2.5.12. **Multi-sector strategy** We agree that it is important that climate change is considered in the development of all new policies, regulations and fiscal proposals.
- 2.5.13. An inclusive approach should consider ‘who will be most impacted, how those impacts can be mitigated and how existing inequalities can be reduced. It should consider equity across different groups of society, regions, and communities and generations yet there is no mention of gender through the report or the evidence documents. **We recommend** the plan takes into account research on the gender impacts of climate change and climate action and there are many studies to draw from, including those from the University of the South Pacific. The report acknowledges the barriers for low-income households, older people, disabled people, Māori and Pasifika households in accessing lower emissions technologies and access to transport, and the need for targeted assistance. It acknowledges the income gap for Māori and the high risk of job loss to automation (p.97). The commission should note that the income gap for Māori and Pasifika women is higher still. **We recommend** a co-design approach with affected communities in identifying issues and solutions.
- 2.5.14. **NCWNZ urges** the government to think of all three policy interventions from a bottom-up approach. Communities have expertise to come together all across the country to weave general knowledge with mātauranga Māori, cognisant of Intellectual Property rights, to

inform future approaches. Further investment in this intergenerational approach is essential across the country if we are going to truly find solutions to climate change issues.

2.6. Technology and behaviour change

Big 6. Do you think our proposed emissions budgets and path to 2035 are both ambitious and achievable considering the potential for future behaviour and technology changes in the next 15 years?

2.6.1. Disagree.

2.6.2. The proposed path acknowledges future technology advances and behaviour changes but fails to take into full consideration the existing knowledge, processes and practices of mātauranga Māori which can inform our direction and behaviour now. **We recommend** a holistic ecosystem approach is needed.

2.6.3. Education has a key role in many of these issues including waste. **We recommend** that there is a place for including sustainability, the circular economy, energy and waste reduction issues within the school curriculum.

3. Conclusions

3.1. NCWNZ members believe the Report must be strengthened with requirements on the Commission to consider equity across different groups of society, regions, and communities, iwi, government and generations, to achieve gender balance and reflect diverse perspectives in consultation, advice and reporting. Achieving climate justice is indivisible from achieving an equitable Aotearoa New Zealand.



Suzanne Manning
NCWNZ Board



Christine Caughey
Convenor NCWNZ Climate Change and
Environment Standing Committee