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OraTaiao ERP Submission Guide

Tēnā koutou,

Welcome to the OraTaiao submission guide to the Government's first Emissions Reduction Plan. OraTaiao will be making our own submission on this, and the purpose of the submission guide is to help inform you of our major points which you may choose to include in your own organisational or individual submission. The closing date for submissions is Wednesday 24th of November, and submissions can be made [here](#). The Ministry allows either a quick submission answering 3 major questions, or a longer submission which offers the opportunity to attach a supporting document or answer some or all of the 114 questions which are grouped by topic. These 114 are at the end of this guide for ease of reading.

The Emissions Reduction Plan (ERP) is the next step in the Zero Carbon Bill process, building on the Climate Change Commission advice to Government published in June 2021, making any necessary adjustments to this advice and outlining the actions that will be taken to achieve these. This will guide our domestic climate change response over the next 14 years (1x 4 year, and 2x 5-year emissions budgets) and necessarily overlaps with our international obligations under the Paris Climate Change Agreement and the NDC which we brought to COP26- domestic emission reductions being part, but not all, of the makeup of the NDC.

The publication of the Emissions Reduction Plan has already been delayed by 5 months until May next year, and there is a huge overlap with the Climate Change Commission submission process earlier this year. Accusations of "delay by consultation" are justified, and the delay is unconscionable in the middle of a climate emergency. Although not part of the formal submission questions, it would be worth drawing attention to this unsatisfactory delay.

The ERP achieves the goals as set by the Zero Carbon Bill, and puts Aotearoa on target for net zero emissions of long-term gases by 2050, and a reduction of short-term gases including biogenic methane of 24-48% by the same date. Like the Climate Change Commission advice to government, it is unambitious, flawed in many areas, and inadequate as a plan addressing the "biggest health crisis of the 21st century"

We have kept this submission guide short with major points only included. Our extensive [Climate Change Commission submission](#) from March 2021 contains a wealth of further information, links and references.

The main points we would recommend are as follows

1. The ERP continues the recent history of the Zero Carbon Bill through the Climate Change Commission process of having little or no regard for either the effects of climate change on health or, more importantly, the health and wellbeing co-benefits from well-designed climate action. Health is barely mentioned in the entire document, except as occasional throw-away comments and without any clear plan as to how to maximise the health gains.
2. Te Ao Māori is given more attention, but it can be further strengthened. The discussion is too often on “partnership” without any firm plan regarding giving proper agency to Māori leadership and groups. This is particularly important in the health sector with the impending establishment of the Māori Health Authority, which could be used as an example for the rest of the public sector of a commissioning body which will have real clout and ability to lead (if the Ministry of Health follows through on their promises)
3. The document is profoundly and inexcusably deficient in how it addresses agriculture and food systems. As it acknowledges, this is responsible for nearly half of Aotearoa’s emissions, but is given a mere 4 pages in the 130-page document (waste on the other hand, at 4% of emissions, warrants 10 pages). There is little or no detail within these pages, and more importantly, none whatsoever of one of the recommendations of the Climate Change Commission, that of national herd size and stocking rate reduction.
4. As Minister Shaw has the ultimate authority to decide on the representation of health expertise, either directly to the ministry, or to the Climate Change Commission, OraTaiao recommends continuing a strong call for adequate health representation, including public health expertise, to those bodies planning our climate change response. This could be recommended under Q.21 (p35 of the document)
5. F-gases are a particular area of focus for the health sector, due to their presence in anaesthetic gases and metered-dose inhalers. This is completely absent from the discussion document, which focuses solely on refrigeration and air-conditioning.
6. Further specific recommendations are outlined below. Firstly, under the ‘3 specific questions’ for the brief submission and with further bullet points under the respective headings: transport, energy, agriculture, waste and f-gases should you wish to draft a longer submission.

Dermot Coffey

Co-convenor, OraTaiao: NZ Climate and Health Council

Put human health & wellbeing at the heart of Aotearoa's Emissions Reduction Plan

1. *What are the most important things to consider in developing Aotearoa's Emission Reduction Plan?*

Health at Heart of Plan

Well-designed health-centred climate action will maximise both the health-benefits and emissions reductions.¹

Fit for Purpose

This plan has to work. The purpose of Aotearoa's climate legislation is to fairly contribute to limiting global warming below humanly adaptable 1.5°C and to achieve net zero long-term emissions by 2050. Early action matters most. The next few years are crucial to keeping the 1.5-degree window open.

Post-COP26, Aotearoa must scale up our current NDC from disguised domestic emissions cuts of around 7-9% below 2005 levels by 2030 on a net-net basis. This enhanced NDC must be primarily met by the Emissions Reduction Plan.

Invest in Aotearoa

Invest in urgent climate emission cuts here in Aotearoa now. Offsetting emissions with forestry expansion and land-use change must not be used to delay the necessary decarbonisation needed.

Tiriti-based and Equitable

¹ Hamilton, I. et al. (2021) The public health implications of the Paris Agreement: a modelling study. *The Lancet Planetary Health*. 5(2), E74-83.

Every part of this plan must be based in **te ao Māori and Tiriti partnership** - resourced and representative, and with Māori leadership to the fore.

Prioritise real measures that reduce vulnerability now, so that low emissions living is easy and affordable for everyone. That includes affordable housing, adequate incomes, decent jobs, healthcare, education and enabling environments.

Aotearoa's worst climate polluting companies must be fully accountable now - especially the top ten companies who account for most of Aotearoa's emissions.

2. What new initiatives to include in Aotearoa's Emissions Reduction plan?

Our ERP needs an **urgent and comprehensive plan to help the agricultural sector improve their emissions.**

A clear plan to guide health sector emission reductions- the health sector is the largest greenhouse gas emitter in the public sector. This will need the incorporation of a sustainability unit in the new Health NZ and Māori Health Authority structures, along the lines of the Greener NHS system in NHS England

3. What do you see as the main opportunities and impacts of emission reduction policies in Aotearoa?

As above, the results of well-designed action will be a healthier, more resilient and more equitable Aotearoa. The health benefits must not be underestimated, and can be a crucial driver of behaviour change as they will be **realised far earlier than any climate benefit.**

Global and local evidence shows **health-centred climate action self-funds in health gains** - before counting savings from avoided climate changes.²

Health co-benefits must be counted in evaluating mitigation strategies.

² Chan Fung Fu-Chun, M. (2021) Accelerating towards net zero emissions: the most important global health intervention. The Lancet Planetary Health. 5 (2), e64-e65

Extra information under specific headings:

i. Transport

The new transport targets set for 2035 are too little and too late. We are however pleased to see an increased focus on active transport compared with the Climate Change Commission advice.

We support the minimum target reduction of 20% of Vehicle Kilometres Driven but recommend the target be brought forward to 2030. However, in order to achieve the best health outcomes this needs to be coupled with a defined increase in active transport. We recommend a minimum of an absolute increase of 10% in each active mode or a doubling of active transport (cycling and walking) modeshare- **whichever is larger**- in all urban areas with a population over 10,000 by 2030. Investment and development of completely interconnected cycling and walking infrastructure must be available to meet this minimum goal, along with extensive links between active and public transport routes

Fund free public transport for everyone under 25, plus community services card holders, effective immediately.

Ensure easy affordable access for those of us living with disabilities which limit access. Focus on low income communities for co-developed low emissions access solutions

Sign off light rail construction contracts in all our main cities by July 2023.

We recommend no further motorway investment, and a target reduction in private vehicle ownership of 10% by July 2023, with an immediate and concomitant increase in funding for **urban public transport, community car-share schemes, rail investment and intercity non-aviation transport options.**

We strongly support the phase-out of the importation or assembly of all internal combustion engine light vehicles by 2030 at the latest. **This must apply to all light vehicles**, whether or not a non-ICE version is available. **It is crucial that the definition of light vehicles be strengthened**, as some models of large ute are already approaching the 3.5 tonne limit.

Consideration must be given to stopping the importation of used ICE vehicles earlier to avoid Aotearoa becoming a dumping ground for these. Due consideration and planning must also be given to a just transition away from ICE-vehicles, as an

accelerating shift will run the risk of poorer families being left with stranded assets with an increasing cost to run

Support the 'at point first registration charge' starting 1 January 2022. To be effective, the charge should rapidly grade up, because the charges as set will only represent a few percentage points increase in the price of new vehicles.

Buses: only zero-emission buses should be purchased as of now. Current contracts for purchase of ICE buses should be the subject of Governmental review and ways sought to cancel these in favour of zero-emission buses.

Schools: need safe active transport corridors that avoid any arterial traffic and extensively traffic calmed suburban streets through street redesign (cf. the Future Streets Te Ara Mua project) and speeds restricted to around 20 – 30 km/hr or less on suburban streets. Recommend extensive infrastructure investment in safe road crossings and cycle/scooter lanes. We strongly support the conversion of road space to active and public transport space, especially in suburban areas where children go to and from school.

ii. Energy and industry; Building and construction

We broadly support the recommendations around building and construction. We support emissions caps for all public buildings, and a rapid scale-up of grants and support to private homeowners to adequately insulate properties.

We recommend a target of 2025 for the end of coal-use within Aotearoa. This will need a rapid expansion of the government's current plan to replace or repurpose coal-boilers to renewable fuels within the public sector, a similar plan to support private sector reduction and an accelerated plan to expand renewable electricity generation.

In order to optimise the health gains from reduced air pollution, the aim must be to replace coal-fired boilers with electric heating and measures to reduce heat loss whenever possible, as distinct from wood-pellet boilers.

iii. Agriculture and forestry

Cutting climate pollution needs every sector and every climate-damaging gas. Essentially excluding the half of Aotearoa's emissions that come from agriculture from this plan (and the Emissions Trading Scheme) is indefensible. Aotearoa should be a world-leader in pivoting to climate friendly food production



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Immediate and rapid reduction of artificial fertiliser use will help reduce climate emissions, improve waterways and reduce groundwater pollution. There is increasing acknowledgement of the links between nitrate drinking water pollution and colorectal cancer

Aotearoa's lands must be used for food production that is healthy for humans and for our environment. This means diversity within farms and much more plant-based foods.

A plant-based diet is potentially more cost-effective than an omnivore or pescatarian diet within middle to upper-income countries, such as Aotearoa. A population shift to healthier and more sustainable diets can therefore support reductions in our unnecessarily high food insecurity rates (1 in 5 children)

The current Healthy Eating and Activity Guidelines (for all age groups) must prioritize sustainable diets and food productions. Robust criteria for sustainable and healthy food must be included in all food-related procurement policies.

Food sovereignty (people's right to their own food systems including culture and production) must feature in our understanding of well-being.

The use of fossil fuel derived energy within the food production system, for example in **milk drying with coal boilers** needs a specific focus and rapid phase-out.

We acknowledge and support the Ministry's position on forestry planting and agree that it must not be used to unnecessarily delay decarbonisation. We advise an increased stress on native forest plantation and restoration, as recommended by the Climate Change Commission.

iv. Waste and F-gases

F-gases are a significant contributor to healthcare emissions, via anaesthetic gases or metered-dose inhaler propellants³. These are not addressed within the plan. We advise two measures- an establishment of a Sustainability Unit within the new Health NZ and Māori Health Authority to oversee and guide the clinical decisions that will need to be made to achieve health sector decarbonisation, and a target ratio of a

³ Beasley, R. (2020) *NZ Adolescent and Adults Asthma Guidelines. Asthma and Respiratory Foundation NZ: Wellington. Available at: https://www.nzrespiratoryguidelines.co.nz/uploads/8/3/0/1/83014052/arfnz_adolescent_and_adult_asthma_guidelines_.pdf (accessed 14/11/2021)*

minimum use of dry powder inhaler to metered dose inhaler of 70:30 (from the current 30:70) by 2030, this being an already clinically-beneficial indication.

Appendix: Meeting the net-zero challenge

Consultation Questions

Transition pathway

1. *Do you agree that the emissions reduction plan should be guided by a set of principles? If so, are the five principles set out above, the correct ones? Please explain why or why not.*
2. *How can we enable further private sector action to reduce emissions and help achieve a productive, sustainable and inclusive economy? In particular, what key barriers could we remove to support decarbonisation?*
3. *In addition to the actions already committed to and the proposed actions in this document, what further measures could be used to help close the gap?*
4. *How can the emissions reduction plan promote nature-based solutions that are good for both climate and biodiversity?*
5. *Are there any other views you wish to share in relation to the Transition Pathway?*

Helping sectors adapt

6. *Which actions to reduce emissions can also best improve our ability to adapt to the effects of climate change?*



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7. *Which actions to reduce emissions could increase future risks and impacts of climate change, and therefore need to be avoided?*

Working with our Tiriti partners

8. *The Climate Change Commission has recommended that the Government and iwi/Māori partner on a series of national plans and strategies to decarbonise our economy. Which, if any, of the strategies listed are a particular priority for your whānau, hapū or iwi and why is this?*
9. *What actions should a Māori-led transition strategy prioritise? What impact do you think these actions will have for Māori generally or for our emission reduction targets? What impact will these actions have for you?*
10. *What would help your whanau, community, Māori collective or business to participate in the development of the strategy?*
11. *What information would your Māori collective, community or business like to capture in an emissions profile? Could this information support emissions reductions at a whanau level?*
12. *Reflecting on the Commission's recommendation for a mechanism that would build strong Te Tiriti partnerships, what existing models of partnership are you aware of that have resulted in good outcomes for Māori? Why were they effective?*

Making an equitable transition

Equitable Transitions Strategy

The Commission recommends developing an Equitable Transitions Strategy that addresses the following objectives: partnership with iwi/Māori, proactive transition planning, strengthening the responsiveness of the education system, supporting workers in transition, and minimising unequal impacts in all new policies.

13. *Do you agree with the objectives for an Equitable Transitions Strategy as set out by the Climate Change Commission? What additional objectives should be included?*



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14. *What additional measures are needed to give effect to the objectives noted by the Climate Change Commission and any other objectives that you think should be included in an Equitable Transitions Strategy?*

The Commission suggests that the Equitable Transitions Strategy should be co-designed alongside iwi/Māori, local government, regional economic development agencies, businesses, workers, unions, the disability community and community groups.

15. *What models and approaches should be used in developing an Equitable Transitions Strategy to ensure that it incorporates and effectively responds to the perspectives and priorities of different groups?*

Other actions

16. *How can Government further support households (particularly low-income households) to reduce their emissions footprint?*
17. *How can Government further support workers at threat of displacement to develop new skills and find good jobs with minimal disruption?*
18. *What additional resources, tools and information are needed to support community transition planning?*
19. *How could the uptake of low-emissions business models and production methods be best encouraged?*
20. *Is there anything else you wish to share in relation to making an equitable transition?*

Aligning systems and tools

Government accountability and coordination

21. *In addition to the Climate Change Commission monitoring and reporting on progress, what other measures are needed to ensure government is held accountable?*



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22. *How can new ways of working together like mission-oriented innovation help meet our ambitious goals for a fair and inclusive society and a productive, sustainable and climate-resilient economy?*
23. *Is there anything else you wish to share in relation to government accountability and coordination?*

Funding and financing

24. *What are the main barriers or gaps that affect the flow of private capital into low-emissions investment in Aotearoa?*
25. *What constraints have Māori and Māori collectives experienced in accessing finance for climate change response activities?*
26. *What else should the Government prioritise in directing public and private finance into low-emissions investment and activity?*
27. *Is there anything else you wish to share in relation to funding and financing?*

Emissions pricing

28. *Do you have sufficient information on future emissions price paths to inform your investment decisions?*
29. *What emissions price are you factoring into your investment decisions?*
30. *Do you agree the treatment of forestry in the New Zealand Emissions Trading Scheme (NZ ETS) should not result in a delay, or reduction of effort, in reducing gross emissions in other sectors of the economy?*
31. *What are your views on the options presented above to constrain forestry inside the NZ ETS? What does the Government need to consider when assessing options? What unintended consequences do we need to consider to ensure we do not unnecessarily restrict forest planting?*
32. *Are there any other views you wish to share in relation to emissions pricing?*



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Planning

33. *In addition to resource management reform, what changes should we prioritise to ensure our planning system enables emissions reductions across sectors? This could include partnerships, emissions impact quantification for planning decisions, improving data and evidence, expectations for crown entities, enabling local government to make decisions to reduce emissions.*
34. *What more do we need to do to promote urban intensification, support low-emissions land uses and concentrate intensification around public transport and walkable neighbourhoods?*
35. *Are there any other views you wish to share in relation to planning?*

Research, science and innovation

36. *What are the big challenges, particularly around technology, that a mission-based approach could help solve?*
37. *How can the research, science and innovation system better support sectors such as energy, waste or hard-to-abate industries?*
38. *What opportunities are there in areas where Aotearoa has a unique global advantage in low-emissions abatement?*
39. *How can Aotearoa grow frontier firms to have an impact on the global green economy? Are there additional requirements needed to ensure the growth of Māori frontier firms? How can we best support and learn from mātauranga Māori in the science and innovation systems, to lower emissions?*
40. *What are the opportunities for innovation that could generate the greatest reduction in emissions? What emissions reduction could we expect from these innovations, and how could we quantify it?*
41. *Are there any other views you wish to share in relation to research, science and innovation?*

Behaviour change



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42. *What information, tools or forums would encourage you to take greater action on climate change?*
43. *What messages and/or sources of information would you trust to inform you on the need and benefits of reducing your individual and/or your businesses emissions?*
44. *Are there other views you wish to share in relation to behaviour change?*

Moving Aotearoa to a circular economy

45. *Recognising our strengths, challenges, and opportunities, what do you think our circular economy could look like in 2030, 2040, and 2050, and what do we need to do to get there?*
46. *How would you define the bioeconomy and what should be in scope of a bioeconomy agenda? What opportunities do you see in the bioeconomy for Aotearoa?*
47. *What should a circular economy strategy for Aotearoa include? Do you agree the bioeconomy should be included within a circular economy strategy?*
48. *What are your views of the potential proposals we have outlined? What work could we progress or start immediately on a circular economy and/or bioeconomy before drawing up a comprehensive strategy?*
49. *What do you see as the main barriers to taking a circular approach, or expanding the bioeconomy in Aotearoa?*
50. *The Commission notes the need for cross-sector regulations and investments that would help us move to a more circular economy. Which regulations and investments should we prioritise (and why)?*
51. *Are there any other views you wish to share in relation to a circular economy and/or bioeconomy?*

Transitioning key sectors



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Transport

We are proposing **four new transport targets** in the emissions reduction plan, and are seeking your feedback.

52. *Do you support the target to reduce vehicle kilometres travelled by cars and light vehicles by 20 per cent by 2035 through providing better travel options, particularly in our largest cities, and associated actions?*
53. *Do you support the target to make 30 per cent of the light vehicle fleet zero-emissions vehicles by 2035, and the associated actions?*
54. *Do you support the target to reduce emissions from freight transport by 25 per cent by 2035, and the associated actions?*
55. *Do you support the target to reduce the emissions intensity of transport fuel by 15 per cent by 2035, and the associated actions?*
56. *The Climate Change Commission has recommended setting a time limit on light vehicles with internal combustion engines entering, being manufactured, or assembled in Aotearoa as early as 2030. Do you support this change, and if so, when and how do you think it should take effect?*
57. *Are there any other views you wish to share in relation to transport?*

Energy and industry

Energy strategy

58. *In your view, what are the key priorities, challenges and opportunities that an energy strategy must address to enable a successful and equitable transition of the energy system?*
59. *What areas require clear signalling to set a pathway for transition?*

Setting targets for the energy system

60. *What level of ambition would you like to see Government adopt, as we consider the Commission's proposal for a renewable energy target?*

Phasing out fossil gas while maintaining consumer wellbeing and security of supply



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61. *What are your views on the outcomes, scope, measures to manage distributional impacts, timeframes and approach that should be considered to develop a plan for managing the phase out of fossil gas?*

Decarbonising the industry sector

62. *How can work under way to decarbonise the industrial sector be brought together, and how would this make it easier to meet emissions budgets and ensure an equitable transition?*
63. *Are there any issues, challenges and opportunities for decarbonising the industrial sector that the Government should consider, that are not covered by existing work or the Commission's recommendations?*

Addressing current data gaps on New Zealand's energy use and associated emissions through an Energy and Emissions Reporting scheme

64. *In your view, should the definition of a large energy user for the purposes of the proposed Energy and Emissions Reporting scheme include commercial and transport companies that meet a specified threshold?*
65. *We have identified a proposed threshold of 1 kt CO₂e for large stationary energy users including commercial entities. In your view, is this proposed threshold reasonable and aligned with the Government's intention to meet emissions budgets and ensure an equitable transition?*
66. *In your view, what is an appropriate threshold for other large energy users such as transport companies?*
67. *Are there other issues, challenges or opportunities arising from including commercial and transport companies in the definition of large energy users for the purposes of the proposed Energy and Emissions Reporting scheme that the Government should consider? Supporting evidence on fleet size and characteristics is welcomed.*

Supporting development and use of low-emissions fuels

68. *What level of support could or should Government provide for development of low-emissions fuels, including bioenergy and hydrogen resources, to support decarbonisation of industrial heat, electricity and transport?*
69. *Are there any other views you wish to share in relation to energy?*

Building and construction

70. *The Commission recommended the Government improve the energy efficiency of buildings by introducing mandatory participation in energy performance programmes for existing commercial and public buildings. What are your views on this?*
71. *What could the Government do to help the building and construction sector reduce emissions from other sectors, such as energy, industry, transport and waste?*
72. *The Building for Climate Change programme proposes capping the total emissions from buildings. The caps are anticipated to reduce demand for fossil fuels over time, while allowing flexibility and time for the possibility of low-emissions alternatives. Subsequently, the Commission recommended the Government set a date to end the expansion of fossil gas pipeline infrastructure (recommendation 20.8a). What are your views on setting a date to end new fossil gas connections in all buildings (for example, by 2025) and for eliminating fossil gas in all buildings (for example, by 2050)? How could Government best support people, communities and businesses to reduce demand for fossil fuels in buildings?*
73. *The Government is developing options for reducing fossil fuel use in industry, as outlined in the Energy and industry section. What are your views on the best way to address the use of fossil fuels (for example, coal, fossil gas and LPG) in boilers used for space and water heating in commercial buildings?*
74. *Do you believe that the Government's policies and proposed actions to reduce building-related emissions will adversely affect any particular people or groups? If so, what actions or policies could help reduce any adverse impacts?*
75. *How could the Government ensure the needs and aspirations of Māori and iwi are effectively recognised, understood and considered within the Building for Climate Change programme?*
76. *Do you support the proposed behaviour change activity focusing on two key groups: consumers and industry (including building product producers and*

building sector tradespeople)? What should the Government take into account when seeking to raise awareness of low-emissions buildings in these groups?

77. *Are there any key areas in the building and construction sector where you think that a contestable fund could help drive low-emissions innovation and encourage, or amplify, emissions reduction opportunities? Examples could include building design, product innovation, building methodologies or other?*
78. *The Ministry of Business, Innovation and Employment (MBIE) is considering a range of initiatives and incentives to reduce construction waste and increase reuse, repurposing and recycling of materials. Are there any options not specified in this document that you believe should be considered?*
79. *What should the Government take into account in exploring how to encourage low-emissions buildings and retrofits (including reducing embodied emissions), such as through financial and other incentives?*
80. *What should the Government take into account in seeking to coordinate and support workforce transformation, to ensure the sector has the right workforce at the right time?*
81. *Our future vision for Aotearoa includes a place where all New Zealanders have a warm, dry, safe and durable home to live in. How can we ensure that all New Zealanders benefit from improved thermal performance standards for our buildings?*
82. *Are there any other views you wish to share on the role of the building and construction sector in the first emissions reduction plan?*

Agriculture

83. *How could the Government better support and target farm advisory and extension services to support farmers and growers to reduce their emissions?*
 - a. *How could the Government support the specific needs of Māori-collective land owners?*
84. *What could the Government do to encourage uptake of on-farm mitigation practices, ahead of implementing a pricing mechanism for agricultural emissions?*



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85. *What research and development on mitigations should Government and the sector be supporting?*
86. *How could the Government help industry and Māori agribusinesses show their environmental credentials for low-emissions food and fibre products to international customers?*
87. *How could the Government help reduce barriers to changing land use to lower emissions farming systems and products? What tools and information would be most useful to support decision-making on land use?*
88. *Are there any other views you wish to share in relation to agriculture?*

Waste

89. *The Commission's recommended emissions reduction target for the waste sector significantly increased in its final advice. Do you support the target to reduce waste biogenic methane emissions by 40 per cent by 2035?*
90. *Do you support more funding for education and behaviour change initiatives to help households, communities and businesses reduce their organic waste (for example, food, cardboard, timber)?*
91. *What other policies would support households, communities and businesses to manage the impacts of higher waste disposal costs?*
92. *Would you support a proposal to ban the disposal of food, green and paper waste at landfills for all households and businesses by 1 January 2030, if there were alternative ways to recycle this waste instead?*
93. *Would you support a proposal to ban all organic materials going to landfills that are unsuitable for capturing methane gas?*
94. *Do you support a potential requirement to install landfill gas (LFG) capture systems at landfill sites that are suitable?*
95. *Would you support a more standardised approach to collection systems for households and businesses, which prioritises separating recyclables such as fibre (paper and cardboard) and food and garden waste?*



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96. *Do you think transfer stations should be required to separate and recycle materials, rather than sending them to landfill?*
97. *Do you think that the proposals outlined in this document should also extend to farm dumps?*
98. *Do you have any alternative ideas on how we can manage emissions from farm dumps, and waste production on farms?*
99. *What other options could significantly reduce landfill waste emissions across Aotearoa?*

F-gases

100. *Do you think it would be possible to phase down the bulk import of hydrofluorocarbons (HFCs) more quickly than under the existing Kigali Amendment timetable, or not?*
101. *One proposal is to extend the import phase down to finished products containing high-global warming potential HFCs. What impact would this have on you or your business?*
102. *What are your views on restricting the import or sale of finished products that contain high-global warming potential HFCs, where alternatives are available?*
103. *What are your views on utilising lower global warming potential refrigerants in servicing existing equipment?*
104. *Do you have any thoughts on alternatives to HFC refrigerants Aotearoa should utilise (eg, hydrofluoroolefins or natural refrigerants)?*
105. *Can you suggest ways to reduce refrigerant emissions, in combination with other aspects of heating and cooling design, such as energy efficiency and building design?*

Forestry



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106. *Do you think we should look to forestry to provide a buffer in case other sectors of the economy under-deliver reductions, or to increase the ambition of our future international commitments?*
107. *What do you think the Government could do to support new employment and enable employment transitions in rural communities affected by land-use change into forestry?*
108. *What's needed to make it more economically viable to establish and maintain native forest through planting or regeneration on private land?*
109. *What kinds of forests and forestry systems, for example long-rotation alternative exotic species, continuous canopy harvest, exotic to native transition, should the Government encourage and why?*
 - a. *Do you think limits are needed, for example, on different permanent exotic forest systems, and their location or management? Why or why not?*
 - b. *What policies are needed to seize the opportunities associated with forestry while managing any negative impacts?*
110. *If we used more wood and wood residues from our forests to replace high emitting products and energy sources, would you support more afforestation? Why or why not?*
111. *What role do you think should be played by:*
 - a. *central and local governments in influencing the location and scale of afforestation through policies such as the resource management system, ETS and investment?*
 - b. *the private sector in influencing the location and scale of afforestation?*

Please provide reasons for your answer.

112. *Pests are a risk to carbon sequestration and storage in new, regenerating and existing forest. How could the Government support pest control/management?*

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113. *From an iwi/Māori perspective, which issues and potential policies are a priority and why, and is anything critical missing?*
114. *Are there any other views you wish to share in relation to forestry?*

