



Climate Change Commission
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Attn: Submission analysis team

27 March 2021

Submission on the Climate Change Commission's Draft Advice to Government

1. The Hurunui District Council (HDC) would like to thank the Commission for the opportunity to comment on their draft advice.
2. The Hurunui District is located in North Canterbury. We have approximately 12,558 residents and cover an area of 8,646 km² spanning from the east coast across to the Main Divide. The Hurunui District is predominantly rural land interspaced with small service towns. Our economy is primarily reliant on primary production and tourism.
3. We strongly believe that the world needs to work more efficiently and that the most carbon efficient countries should continue to do what they are most efficient at. In reducing our emissions we don't want to simply send them offshore to less productive markets. Climate change is a global issue not a national one and nothing is gained if more carbon efficient local production is replaced with less carbon efficient imports or vice versa.
4. HDC is part of the Canterbury Mayoral Forum and supports their submission. Additional to this we would like to raise the points set out below.

Split gas approach

5. HDC supports the split gas approach and note the important difference between short and long lived gases.

Principles of guidance

6. HDC supports the principles as drafted and have two additional principles we believe are important.
 - a. Focus on continuous improvement.

While the targets are valuable indicators of progress they should not, in themselves, be the goal. HDC believe the ongoing direction reduction in carbon footprints is more important than reaching a particular target and thinking 'job done.' If one industry meets their reduction target early, it does not mean that they should stop striving to reduce their emissions. Alternatively, there may be other sectors that are making a genuine determined effort to reduce their emissions and still fall short. Some sectors are likely to find quick wins while others may struggle through expensive options with little gain. It is the overall impact that is important.

HDC also notes that focusing on a percentage reduction per sector is not wholly an equitable approach. It sets a starting point based on emissions in 2018 instead of focusing on a sectors' emission reduction journey. In particular, we note that the Beef and Lamb industry have undertaken significant work over

the last decade and have already made significant inroads into their emission profile. However, their starting point is 2018 like other sectors.

We are also concerned with the focus on the percentage of our carbon equivalent emissions attributed to each sector. It is a red herring to argue that agriculture is 48% of our carbon equivalent emissions – of course it is, it is our biggest economic activity (bearing in mind carbon emissions from international air travel are not counted). As we shift to renewable energy sources and decarbonise transport, agriculture is likely to become a larger percentage of our emissions. Something will always be 48% of our emissions – it is not the percentage which is important but the gross number that agriculture or another activity forms 48% of.

b. The need for a global approach.

HDC strongly support the Commission's focus on decarbonising the economy. However, we do believe an international holistic view is required. For example, New Zealand is the most efficient dairy producer in the world.¹ While we fully support continuous improvement, we would not like to see this at the cost of production moving offshore to less efficient markets. As an international community we need to work smarter and shift production to the most efficient producers acknowledging that this may lead to higher emissions within that country but will ultimately lead to lower emissions overall. This is particularly apparent when one considers emissions in relation to the number of people who use a product globally rather than the nation's population (see paragraphs 29-30).

Forestry

7. HDC strongly support a focus in decarbonisation and reserving forestry offsets for hard to remove emissions. We like that the focus of the advice is on fixing the problem instead of simply employing a "pollute and pay" policy.
8. The Council also strongly support the focus on planting new native forestry noting the wider benefits for the environment, including biodiversity, cultural values and national identity.

Agriculture

9. As a District heavily reliant on agriculture, HDC has a strong interest in agricultural policy. HDC supports the focus on technologies that are currently available as opposed to relying on technologies that may or may not be available to help the transition to lower carbon equivalent emissions.

Conversion to horticulture

10. HDC is not sure that the full costs of the proposal to replace dairy with horticulture have been considered, including both the carbon footprints of horticulture, the heavier reliance on pesticides, fungicides and herbicides, or the need for high reliable irrigation leading up to harvest. For example, horticulture requires more specialised machinery. There is currently no low emission version of this technology and therefore increases transport emissions. Moreover, horticulture produce is required to travel by plane internationally, whereas milk products are currently shipped internationally. The wider emissions profile and other environmental footprints of each industry needs to be considered prior to advocating such policies to ensure we are not simply swapping one environmental issue for another. There is also land in New Zealand that is naturally too wet for crops. This land is more suited to efficient dairying.
11. There are also potential adverse effects of decreasing stock numbers but continuing to seek the same level of production. For example, if you reduce stock numbers but seek the same production the remaining cows need to eat more to produce more milk which in turn produces more gas. Animal welfare issues also need to be considered.

¹ <https://www.dairynz.co.nz/media/5794083/mapping-the-carbon-footprint-of-milk-for-dairy-cows-report-updated.pdf>

Gene editing

12. If food production is to remain the same with reduced emissions the Government needs to reconsider policy and regulation on gene editing. Science is likely to hold some of the solutions to reducing emissions while continuing to produce at the same or increased levels as today. Gene editing should not just be limited to animals but should go further to look into how to make plants sequest more carbon.
13. Any gene editing needs to be regulated by tight controls and should be well tested in a safe controlled environment but we do submit that if we are to tackle these substantive environmental problems we may need to use science and technology to do so.

Potential development and innovation

14. HDC supports and advocates a flexible approach to emissions reduction.
15. We note at the moment cross-bred wool is currently worthless. However, we are efficient and prolific producers of wool and should a new technology emerge that utilises this we should position ourselves as a country to provide this resource. This fits with principle 7 of the Commission's advice regarding leveraging co-benefits.

Reliability of power and its role in transport

16. Within rural New Zealand prolonged power cuts are unfortunately a fact of life after natural disasters or weather events and our rural communities are incredibly resilient and resourceful in managing the implications of these. Our most isolated dwellings may have to manage for days or weeks after a disaster with electricity and consequently most rural dwellings have options for solid fuel heating, cooking and in many cases diesel generators.
17. As the vehicle fleet transitions to an electric fleet this has an impact on the resilience of our rural communities when power is lost. This potentially affects productivity both in terms of being able to charge vehicles required on the farm and have access to transport in an adverse event including to be able to transport family members and feed out to livestock. The use of petrol and diesel have the benefit that these fuels can be stored on farm ensuring essential work can continue.
18. If electricity is to be relied on there needs to be a strong national focus on ensuring the security of power to all properties.

Transport

Aviation

19. HDC do not support excluding aviation from our emissions reduction. If we are going to change the way we get around road emissions can simply be replaced by aviation emissions.

Reducing vehicle movements

20. We support the Commission's goal of reducing the number of vehicle movements per day but do not consider this works well in a rural environment where distances are longer, cars travel faster and roads are currently not built with footpaths for safe walking and biking. Public transport is also not available or viable in a lot of these areas (or would end up with a greater footprint than a light passenger car).
21. However, on the flip side we also believe the guidance isn't strong enough with its approach to transport. Simply replacing petrol cars with electric cars does not reduce congestion issues. There is also a large carbon footprint involved with the production of vehicles regardless of how they are fuelled. Fundamentally New Zealand needs to change the way we get around, particularly for short trips. Options such as cheap short-term hire cars should be considered and policies implemented to ensure this is an affordable option. For instance, for those who only use their car once a week it may work out cheaper to hire a car for a few hours as required as opposed to paying to own and maintain a car. If hiring an appropriate vehicle for the week worked out cheaper it could reduce the number of cars

owned per household. The focus should be on reducing the overall number of cars and reducing the emissions produced.

Car efficiency ratings

22. While there is a limited supply of second-hand electric vehicles, and for limited purposes, another option is to focus on the carbon efficiency of a vehicle rather than its fuel source. New Zealand could look to limit the import of cars that don't meet a particular efficiency rating (in the same way we approach safety ratings).

Farming equipment

23. The guidance is silent on what specialised farming equipment may look like in the future. We note that horticulture requires more specialised equipment than dairy farming. Therefore, as more farmland is converted to horticulture there is likely to be an increase in transport emissions on farm especially if there is no viable alternative. This could have effect of swapping short-lived biogenic methane emissions for long-lived carbon dioxide emissions.

Waste

24. HDC would like to see a stronger phase out of synthetics used for plastic packaging and in insulation in homes. We note that while it is important to address the issue of carbon emissions from energy use we are still creating and importing multiple petroleum-based products and other products with a substantial carbon footprint.

Messaging

25. HDC does not support the way that sector emissions are often shown. Agriculture is always going to be a certain percentage of the overall emissions. Provided all sectors reduce their emissions this number is not going to change significantly over time. Emissions need to be considered in terms of what they contribute to both the New Zealand and international economy.
26. A lot of the advice is very urban focussed. For example, increasing the percentage of walking, cycling and public transport usage is possible in urban centres. However, while there may be some room for increased walking and cycling in small rural townships this is limited outside the townships by the types of roads, speed of traffic and distance needing to be covered. Moreover, public transport is unlikely to ever be a viable option in most of our District. This does not mean rural communities have an excuse to do nothing rather the actions they need to take are likely to differ to larger urban centres.
27. Moreover, rural districts like the Hurunui are the place to sequester carbon to offset emissions from other sectors. We all have our role to play and the messaging needs to focus holistically on what various sectors are contributing to the overall goal.
28. HDC request that the messaging remains balanced and focusses on the areas as a whole including both what they are doing and what they are able to do.

Exporting vs importing nations

29. New Zealand is an exporting nation. We produce approximately 21 billion litres of milk every year which equates to three serves of dairy per day for 78 million people.² We don't just produce for our five million residents. This means that our agricultural emissions are high when you look at them as a per capita of New Zealand population and compare this to our transport emissions for example. However, when you consider our agricultural emissions in terms of mouths fed the profile is suddenly quite different.

² <https://www.dcanz.com/about-the-nz-dairy-industry/#:~:text=New%20Zealand%20produces%20approximately%2021,billion%20litres%20per%20day%20for%2078%20million%20people>.

30. International agreements should take importing and exporting into consideration when setting national targets. The most efficient nations should continue to produce what they are efficient at producing. Otherwise the shortfall will be picked up by countries who are less efficient.

Yours sincerely,

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