

New Plymouth District Council Draft District-Wide Emissions Reduction Plan

Feedback from Climate Justice Taranaki, July 2022

Climate Justice Taranaki Inc. (CJT) is a community group dedicated to environmental sustainability and social justice. This includes issues of inter-generational equity, notably in relation to climate change, which impact current and future generations' inalienable rights to safe water, food and shelter, crucial to sustaining livelihoods and quality of life. CJT appreciates the opportunity to provide feedback on the New Plymouth District Council's Draft District-Wide Emissions Reduction Plan¹ (ERP).

Emissions Reduction Targets

Climate change is the moral and political issue of our times. It requires grassroots to policy changes based on shared values for a just and transformative change.

The New Zealand government's emissions reduction targets are weak and flawed². Our Nationally Determined Contribution under the Paris Agreement relies heavily on overseas offsets³. NZ is going against credible science and the IPCC's latest advice (IPCC AR6, 2022⁴,⁵) which itself was watered down due to industry and corporate influence⁶. The working group (WGIII) report Summary for Policymakers⁷ projected that global GHG emissions must peak before 2025 to have a 50% chance of limiting warming to within 1.5°C with no or limited overshoot. Co-Chair of WGIII Jim Skea warned, "***It's now or never... Without immediate and deep emissions reductions across all sectors, it will be impossible.***"

Yet the NZ government has split targets for biogenic methane emissions – 10% reduction by 2030 and 24-47% by 2050. Notably, NZ has signed onto the Global Methane Pledge (COP26, Nov 2021)⁸ which commits nations to collectively reduce methane emissions by 30% by 2030. As a wealthy nation with disproportionately high levels of methane emissions, NZ ought to deliver even greater methane emission reduction than others, and not by way of

¹<https://www.npdc.govt.nz/media/loffeer/ecm-8778038-district-wide-emissions-reduction-plan-2022-for-consultation-12-7.pdf>

²[https://climateactiontracker.org/countries/new-zealand/#:~:text=New%20Zealand's%20domestic%20target%20in%20by%202030%20\(including%20LULUCF\)](https://climateactiontracker.org/countries/new-zealand/#:~:text=New%20Zealand's%20domestic%20target%20in%20by%202030%20(including%20LULUCF))

³<https://environment.govt.nz/what-government-is-doing/areas-of-work/climate-change/nationally-determined-contribution/#:~:text=New%20Zealand's%20Nationally%20Determined%20Contribution.-Submission%20under%20the%20&text=New%20Zealand's%20first%20Nationally%20Determined.covers%20the%20period%202021%2D2030>

⁴ <https://www.ipcc.ch/report/sixth-assessment-report-working-group-ii/>

⁵ <https://www.ipcc.ch/report/ar6/wg3/>

⁶https://climateandcapitalism.com/2022/04/28/how-vested-interests-rewrote-the-ipccs-latest-report/?utm_source=rss&utm_medium=rss&utm_campaign=E2%80%A6

⁷ https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_SPM.pdf

⁸ <https://www.globalmethanepledge.org/>

overseas offsets⁹. Taranaki, with its heavy reliance on industrial dairying and fossil fuels extraction, must take both biogenic and fossil methane emissions seriously.

NPDC should lead the way, do much more, rather than simply follow the meagre targets set by the central government. Council needs to work proactively so that all decisions are made with climate change impacts, mitigation and adaptation in mind. As an example, Hamilton City Council voted unanimously to approve a Climate Change Policy which commits Council to embed climate change impacts in Council decision-making, new business cases, new projects and procurement processes¹⁰. For greater focus, accountability and effectiveness, some structural changes within Council, notably having a dedicated climate change team of staff as suggested by submitter Barbara Hammonds, could be considered.

Advocacy

We want NPDC to advocate the central government:

- To set much more ambitious emissions reduction targets that align with IPCC advice at the minimum, and especially reigning in biogenic methane emissions.
- End all coal, oil and gas prospecting, exploration, mining and development, starting with no new permits¹¹ and no construction of fossil fuel reliant infrastructure.
- Reform the electricity market to make it more equitable, eliminate household energy poverty, incentivise renewables and facilitate phasing out fossil fuels.
- Invest hugely in enabling farmers, Māori and other landowners to shift to regenerative farming, agroforestry and rewilding for biodiversity and carbon sequestration.
- Prioritise investments and support for diversified, regenerative food production for local and domestic markets over export driven industrial agriculture. This would help to build food security and community resilience while improving environmental and human health.
- Ensure that support for a fair or **Just Transition** alleviates inequality rather than perpetuates corporate welfare and business as usual.
- Thoroughly consider the ecological, resource and socio-economic costs of any proposed large-scale renewable energy generation and apply the precautionary principle in associated decision making.
- Prioritise investments for local, community renewable energy production and distribution networks over centralised systems, with supportive regulatory mechanisms. This prioritisation would grow community resilience to climate extremes, offer more flexibility and reduce peak demand on the main grid.
- Expand the EECA funded Warmer Kiwi Homes Programme¹² for lower income families, ways to improve the envelope of houses including insulation, draught

⁹ <https://www.newsroom.co.nz/offsets-not-accounting-tricks-the-outrage>

¹⁰ <https://storage.googleapis.com/hccproduction-web-assets/public/Uploads/Documents/Policies/Climate-Change-Project-Climate-Change-Policy-FINAL-Adopted-30-June-2022.PDF>

¹¹ https://www.stuff.co.nz/environment/climate-news/129396935/climate-crisis-of-insufficient-weight-to-stop-oil-and-gas-search--government?cid=app-iPad&fbclid=IwAR1LqEk03EnBIW/NHzfFey3DGgAxHzghW1m9gtAhwkIR0Sp_B_HocLaR2f1w

¹² https://www.eeca.govt.nz/co-funding/insulation-and-heater-grants/warmer-kiwi-homes-programme/?gclid=Cj0KCQjwxIOXBhCrARIsAL1QFCZuEVYXFpAMritCS1B58rahDh2oiG7TAR_onOOmt7e0G577efbEC5gaAITkEALw_wcB

proofing, window treatments etc, while ensuring adequate ventilation. And build many more affordable green public housing that meet these basic requirements and more.

- Pass laws to enable the Right to Repair¹³.

Community education (on waste and recycling, active transport, energy conservation)

It is increasingly important to engage with youth and give youth the agency to effect change. NPDC should work towards establishing a Youth Council¹⁴, as many other district and city councils (e.g. Stratford¹⁵, Kapiti Coast and Southland), have done.

A great deal more could be done in this area, especially through increasing support and reducing barriers for community organisations and initiatives.

In relation to waste, give added support to charity and op shop operations which are increasingly important for the community, with the rising living costs. As an example, the Corso Shop in Waitara diverts an average four van loads of goods away from landfill every week, offers affordable, pre-loved items to communities at minimum prices, yet it has to pay the same fees at the tip to dispose of donated goods that are damaged or can't be sold. Surely Council could exempt it and other similar operations from such fees.

In addition, we would also like the Council to fund community-run tool libraries / repair hubs to further reduce waste, foster the right to repair and offer skill training.

Re active transport, adopt Safer Speeds¹⁶ on our urban and rural roads which would help to get more people onto their bikes.

Counter to climate change education are fossil fuel advertising and sponsorships. We ask the Council to refrain from accepting any new sponsorships from fossil fuel companies.

Planning and infrastructure

"Infrastructure and planning strategies that support more compact urban living, and green spaces..."

We support the shift to compact urban design and development which facilitates active travel and public transport and incorporates more public green space that supports urban farming and markets for local food producers.

We want to see a carless main street in the centre of New Plymouth with targeted mobility support and electric shuttle services, connected to the suburbs by efficient, affordable,

¹³https://www.consumer.org.nz/articles/sign-the-right-to-repair-petition?gclid=Cj0KCQjwxlOXBhCrARIsAL1QFCaCICLSdPJoduCvvg-h0usRrnRWPPxPaysTrHCIC-PpyLozm9zabgaAo5_EALw_wcB

¹⁴ <https://www.myd.govt.nz/young-people/youth-councils-local-government.htm>

¹⁵ <https://www.stratford.govt.nz/our-council/news?item=id:2cvuch19i1cxbyl800sy>

¹⁶<https://www.npdc.govt.nz/community/have-your-say/consultations/recently-closed-consultations/safer-speeds-re-view-urban-roads/>

wheelchair friendly buses and rail. We encourage the Council to trial more on-demand bus services^{17, 18}, especially for rural communities.

In addition to compact urban living and better integrated transport, District Plan reviews need to have a much stronger climate mitigation and adaptation focus. For example, new rules such as mandatory rainwater tanks and/or greywater reuse in new builds would contribute to community resilience as the impacts of climate change intensify. We do not agree with Council Planners' decision against our submission on the proposed District Plan to require rain water tanks or greywater systems in new builds (S42A report - Plan Integration)¹⁹ Our submission on this point was supported by Te Kāhui o Taranaki Trust, Ngā Mahanga a Tāiri and Te Kotahitanga o Te Atiawa Trust, as it would align with their iwi management plans.

Moreover, we ask that NPDC urgently find a solution that will allow the re-instatement of **Ngā Whare Ora Taiao o Ngāmotu** (Sustainable Homes Voluntary Targeted Rate Scheme)²⁰ / Home Energy Scheme²¹ for energy efficient healthy homes. In the meantime, broadening the role and capacity of the Sustainable Home Advisor would be helpful. Notably, money spent on warmer, more sustainable, healthy homes and reducing mould, which are a significant contributor to chronic illness, would be a much better use of council funds than on a "massive sports complex" at this time. Health and wellbeing start in the home.

We look forward to the consultation on Council's Climate Adaptation Plan in 2023.

Delivering low emissions options

"Zero waste facilities, walkways and cycle paths..."

We seek further information on the organic waste processing facility that the Council has committed to in the long-term plan.

We ask the Council to consider setting up a network of community composting facilities, drawing from lessons learnt from existing initiatives^{22, 23} in the country. If planned and managed well, such initiatives would reduce transport emissions and costs, provide local jobs, produce good quality compost or vermicast, support local food production and health, and bring communities together.

NPDC's organisational emissions

"Council plotted a potential path to become a net zero emissions organisation by 2050..."

We are excited about the projects that council has committed to in the Long-Term Plan, notably switching fuel from gas boilers at Len Lye Centre, Puke Ariki, Civic Centre and

¹⁷ <https://www.metlink.org.nz/about/ondemand/>

¹⁸ <https://www.mywayhb.nz/>

¹⁹ <https://proposeddistrictplan.npdc.govt.nz/media/iajfnr01/hearing-23-b-section-42a-report-plan-integration.pdf>

²⁰ <https://www.npdc.govt.nz/council/strategies-plans-and-policies/nga-whare-ora-taiao-o-ngamotu-new-ply-mouth-sustainable-homes-voluntary-targeted-rate-scheme-policy/>

²¹ <https://www.npdc.govt.nz/home-and-property/property/home-energy-scheme/>

²² <https://kaicycle.org.nz/our-services>

²³ <https://compostcollective.org.nz/find-a-community-composting-hub/>

Inglewood and Waitara Pools. However, It is not clear from the ERP when we may expect Council's decarbonisation programme to be completed, with an estimated 42% emissions reduction. The relevant graph on page 33 of the ERP suggests that emissions from Council's infrastructure and assets will continue to rise till 2032. We want the Council to find ways to curb such an increase in emissions by 2025.

For this decarbonisation programme, what will the fossil gas be replaced with? In our various submissions, we have stated our objection to using so-called green hydrogen, notably in the wastewater treatment plant. Our recent letter to the Parliamentary Commissioner for the Environment summed up our main concerns²⁴. Critically, the Commissioner requested the government to conduct a whole-of-system analysis before committing significant blocks of renewable energy to the production of green hydrogen, to ensure that NZ's ability to decarbonise at the national level would not be compromised²⁵. He also sought analyses on the opportunity cost of green hydrogen when compared with alternative options.

In terms of new infrastructure, we do not support the building of any conventional swimming pools, sports centres or stadium, or their expansion, as they are inherently carbon intensive. Instead, we advocate for more nature based, outdoor sports and community events, especially those that generate co-benefits for nature and people.

We note on page 30 of the ERP that once landfill emissions are excluded, Scope 3 emissions; i.e. "*Emissions from the supplies an organisation buys, and then when their customers consume their goods and services*", actually constitutes the vast majority (79%) of Council's emissions. We question whether the Council has any plans to reduce such emissions, and how.

Rather than using forestry and the 'Planting our Place' program to offset emissions, Council should work in earnest to reduce those emissions at source, including 'hard to abate' emissions.

In his recent advice, the Climate Change Commissioner wrote²⁶, "*The current structure of the NZ ETS steers toward a pathway that would achieve the 2050 target primarily through exotic afforestation, with little reduction in gross emissions beyond business as usual. Such a pathway would require high ongoing levels of new planting to maintain net zero emissions, and push the work of decarbonising onto future generations. It would also leave us out of step with much of the world.*" A few months back, Dame Anne Salmond pointed out²⁷, "*In the latest Intergovernmental Panel on Climate Change (AR6) report, for instance, released yesterday, the practice of "planting large scale non-native monocultures, which would lead to loss of biodiversity and poor climate change resilience" was placed among the 'Worst Practices and Negative Adaptation Trade-offs' for temperate forests.*"

²⁴<https://climatejusticetaranaki.files.wordpress.com/2022/03/cjt-letter-to-pce-re-hydrogen-24mar22.pdf>

²⁵<https://www.pce.parliament.nz/publications/letter-to-ministers-woods-shaw-and-robertson-about-green-hydroge>

²⁶<https://www.climatecommission.govt.nz/our-work/advice-to-government-topic/nz-ets/our-advice-on-the-nz-ets/nz-ets-unit-limits-and-price-control-settings-for-2023-2027/>

²⁷<https://www.auckland.ac.nz/en/news/2022/03/01/ann-salmond-ipcc-report-condemns-forestry-use.html>

Irrespective of offsetting, we want Council to vastly expand the Planting Our Place program way beyond the target of 34 hectares of urban forest over 20 years. Increase the community grant Te Korowai o Tāne to extend its reach and community participation.

Set up trials of microforest planting inspired by the Japanese Miyawaki model^{28,29} using NZ native species to examine its potential in carbon sequestration³⁰, biodiversity restoration and social benefits, with the aim of developing the best suited models for the district and for Taranaki. Widespread planting of micro-forests across the district and region has the potential to generate a myriad of other co-benefits, including education, community engagement, fostering wildlife, moderating heat and water flows, and providing income and job opportunities.

Finally, we request a full disclosure, through an audit if necessary, of all council investments through the Perpetual Investment Fund (PIF), and Council commitment to divesting from any climate and ecologically damaging or socially unethical activities, to **regenerative investments** that restore the health of the planet and people's wellbeing.

Please refrain from funding negative emissions technology developments³¹, including carbon capture and storage (CCS), direct air capture, etc. Instead, we urgently need to put our limited resources and time into actually cutting gross emissions, rather than wasting them in costly, risky ventures that come with far-ranging negative environmental and social impacts³², without addressing the real problems³³.

We need to recognise biophysical limits³⁴ and respect planetary boundaries, pull back from our extravagant, extractive economic growth model, and invest in regenerating the health, wellbeing and resilience of our ecosystems and people, especially the marginalised.

²⁸<https://www.theguardian.com/environment/2020/jun/13/fast-growing-mini-forests-spring-up-in-europe-to-aid-climate>

²⁹<https://www.rnz.co.nz/national/programmes/afternoons/audio/2018781782/new-zealand-s-first-microforest>

³⁰https://www.tanestrees.org.nz/site/assets/files/1069/carbon_sequestration_by_native_forest_-_web.pdf

³¹<https://www.araake.co.nz/insights/ccus/>

³²<https://media.nature.com/original/magazine-assets/d41586-018-06695-5/d41586-018-06695-5.pdf>

³³<https://www.stuff.co.nz/environment/climate-news/300643249/how-not-to-solve-the-climate-change-problem?cid=PDM724507&bid=1466549407>

³⁴<https://www.nature.com/articles/nclimate2870>