

Climate Change Response (Emissions Trading Scheme Agricultural Obligations) Amendment Bill¹

Climate Justice Taranaki submission, 28 July 2024

1. Climate Justice Taranaki (CJT)² is a community group dedicated to environmental sustainability and social justice. This includes issues of inter-generational equity, notably in relation to climate change. Composed of a broad range of people with varied expertise and life experiences, CJT has engaged respectfully with government on numerous occasions.
2. CJT has submitted on various consultation papers, policies and Bills relating to climate change, agriculture and the Emissions Trading Scheme over the past decade. The current submission on the Climate Change Response (Emissions Trading Scheme Agricultural Obligations) Amendment Bill³ builds on some of our earlier submissions^{4, 5, 6}.
3. CJT is opposed to the Bill which amends the Climate Change Response Act 2002 to remove agriculture activities from the New Zealand Emissions Trading Scheme (NZ ETS). The Bill also means that all agricultural emissions reporting and surrender obligations for processors and farmers will be completely repealed.
4. The agricultural industry is responsible for half or more of NZ's greenhouse gas emissions. It should pay for the costs, substantially reduce its emissions and transform to systems that support NZ's food security⁷, community wellbeing, resilience and biodiversity restoration. Progressive farmers are already doing these, working with nature rather than against it and becoming the solution rather than problem⁸.
⁹. Government's regulatory framework ought to incentivise such change rather than going backwards and emboldening business as usual.
5. The Regulatory Impact Statement (RIS)¹⁰ claims that the Bill "*clears the way for new agricultural pricing legislation to be introduced and resourced...*" The RIS acknowledges that "*compared to the status quo, this option carries higher risk of not meeting emissions reductions targets and commitments if no alternative pricing system is established in the near future.*" The reality is that there is no meaningful alternative pricing legislation or policies in sight. How exactly does the government plan to pay for over \$20 billion worth of overseas carbon offsets if we fail to meet our Nationally Determined Contribution under the Paris agreement by 2030?
6. The government's so-called independent review^{11,12} of the science and targets of agricultural methane and a proposal to price biogenic methane emissions by 2030 are nothing more than a smokescreen¹³ or delay tactic for big ag. The Parliamentary Commissioner for the Environment¹⁴ says the science of methane is already settled and "*reducing agricultural methane emissions represents the greatest opportunity to reduce New Zealand's contribution to warming.*"
7. The NZ Climate Change Commission¹⁵ also says, "*There is no question that we need to take action on biogenic methane. [Research from the New Zealand Agricultural Gas Greenhouse Research Centre](#) [NZAGRC] shows that biogenic methane emissions have been the largest contribution to global warming in Aotearoa since 1840, aside from deforestation.*"
8. The NZAGRC research states, "*New Zealand's biogenic methane emissions currently make a bigger estimated contribution to global warming than cumulative emissions of fossil carbon dioxide and nitrous oxide combined. If gross emissions of those three gases continued at current rates, biogenic methane would remain New Zealand's largest single contributor to global warming for the next six decades despite its relatively short lifetime in the atmosphere compared to carbon dioxide and nitrous oxide.*"
9. The removal of agricultural emissions from the ETS and reporting obligations essentially translates into a preferential treatment for the meat and dairy industry over plant crop growers. This represents a real

opportunity loss as land continues to be locked up for animal farming while plant-based foods grow in popularity and market share domestically and overseas.

10. Globally, the meat and dairy industry, like big oil, has avoided climate action for decades, using delay, distract and derail tactics. A 2024 report titled *The New Merchants of Doubt*¹⁶ revealed that Fonterra is amongst three companies worldwide that spend more on advertising than on research and development, despite techno-fixes^{17, 18} being touted as key to emissions reduction. “Over the past two decades, New Zealand’s dairy and meat industries, led by powerful lobby groups like Dairy NZ and Federated Farmers, have effectively stalled efforts to regulate agricultural emissions through a combination of political influence, disinformation campaigns, and promises of future technological solutions,” the report concluded.
11. As expressed in our previous submissions, we have no confidence about the ETS because we cannot solve the problems using the same thinking that created them in the first place, neoliberal capitalism in this case. What we need are alternative visions grounded with values for the betterment of common people and the environment.
12. Our vision is an Aotearoa where everybody thrives, both humans and non-humans. With a small population, generally mild weather and productive soils, Aotearoa can become self-sufficient and resilient in food production rather than relying heavily on import and export, as we adapt to a diverse range of local, seasonal crops and a mostly plant-based diet. The quality of our waterways will improve as the use of urea fertilisers and other chemicals are much reduced and ecosystem restorations from wetland to hill country are well supported. Our primary production will have a much stronger timber production and processing sector targeting local needs, notably sustainable healthy homes. Destructive fishing and overexploitation of our marine resources will have stopped. Economic growth will no longer be the doctrine, allowing a consequential reduction of energy and material demands. Emerging strongly is a wellbeing economy that prioritises collective wellbeing, equity, collaboration, sharing and care services for people and nature. Our tamariki will grow up appreciating nature and learning to live within its carrying capacity.
13. Ka ora te taiao, ka ora te tangata.

¹ https://www.parliament.nz/en/pb/sc/make-a-submission/document/54SCPRIP_SCF_9608F1D1-2216-4292-C788-08DC90C80755/climate-change-response-emissions-trading-scheme-agricultural

² <https://climatejusticetaranaki.info/>

³ https://www.legislation.govt.nz/bill/government/2024/0062/latest/d1173171e2.html?search=ts_act%40bill%40regulation%40deemedreg_agricultural_resel_25_a&p=1#LMS967594

⁴ <https://climatejusticetaranaki.info/wp-content/uploads/2024/05/cjt-combined-sub-to-ccc-31may24.pdf>

⁵ <https://climatejusticetaranaki.info/wp-content/uploads/2023/04/cjt-submission-climate-change-response-amendment-bill-re-industrial-allocation-6april23-final.pdf>

⁶ <https://climatejusticetaranaki.info/wp-content/uploads/2020/01/cjt-submission-on-climate-change-response-ets-reform-17jan20-final.pdf>

⁷ https://newsroom.co.nz/2024/02/11/the-security-of-our-food-system/?fbclid=IwAR22e8S4MIua1QR8p_ktxfmlhhesawbDWfmVySy_AVLRPIhBNZhyppfSc5s

⁸ <https://www.wai-kokopu.org.nz/>

⁹ <https://www.calmthefarm.nz/>

¹⁰ <https://environment.govt.nz/what-government-is-doing/cabinet-papers-and-regulatory-impact-statements/ris-amending-the-climate-change-response-act/>

¹¹ <https://www.beehive.govt.nz/release/methane-targets-be-independently-reviewed>

¹² <https://www.interest.co.nz/public-policy/128470/senior-minister-todd-mccay-will-accept-findings-expert-panel-which-has-been>

¹³ <https://www.rnz.co.nz/news/political/519313/government-setting-up-smokescreen-to-look-away-from-climate-change-chloe-swarbrick>

¹⁴ <https://pce.parliament.nz/publications/letter-to-dairynz-beef-plus-lamb-nz-and-federated-farmers-about-submission-on-agricultural-emissions/>

¹⁵ <https://www.climatecommission.govt.nz/get-involved/exploring-the-issues/the-role-of-methane/>

¹⁶ <https://changingmarkets.org/report/the-new-merchants-of-doubt-how-big-meat-and-dairy-avoid-climate-action/>

¹⁷ <https://www.venture.org.nz/assets/Mooving-on-Methane-Post-event-report-June-2024-WEB.pdf>

¹⁸ <https://www.theguardian.com/world/article/2024/jul/18/new-zealand-will-fail-to-meet-2050-net-zero-targets-data-shows-after-climate-policies-scraped>