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Christchurch City Council submission on the Draft Emissions Reduction Plan for 2026-2030

Introduction

Christchurch City Council (the Council) thanks the Ministry for the Environment for the opportunity to provide comment on the Draft Emissions Reduction Plan for New Zealand for the 2026-2030 budget period (the Plan). We understand that a significant amount of work has gone into preparing this document and we offer our feedback in an effort to maximise the benefits to current and future New Zealanders.

Section A. Summary of key points

1. The Plan lacks ambition and clarity, and fails to create the pathway needed to reach net zero emissions by 2050 which is fundamental to achieving our Paris commitments. This exposes New Zealand to additional costs and risks. Council recommends preparing a Plan containing bold actions to reduce emissions that meet New Zealand's emission reduction targets using proven methods.
2. The Plan has an over reliance on the Emissions Trading Scheme (ETS), on carbon removals using forestry (rather than emission reductions), and on technologies that at best could take a long time to be delivered at scale. These represent significant risks to the success of the Plan and the achievement of New Zealand's emission reduction targets.
3. Government actions need to be consistent and aligned to achieve national emission reduction targets. Many recent decisions (e.g., opening New Zealand to oil and gas mining, removing vehicle kilometres travelled reduction plans, removing incentives for electric vehicles and industry decarbonisation) and proposed changes (e.g., lowering insulation standards for buildings) seem out of step with our climate targets. Effective climate responses will require a consistent and sustained whole-of-Government approach.
4. Our Council supports many aspects of this Plan including:
 - a. Adopting an innovation and opportunities-based approach to our climate challenges.
 - b. Making the ETS more robust and effective for reducing emissions.
 - c. Providing policy and legislative certainty for the market to support long-term decision making and investment.
 - d. Significantly increasing the generation of renewable energy.

- e. Developing sustainable aviation and marine fuels.
 - f. Decarbonising public transport services.
5. The Plan would be improved by:
- a. Providing clear direction and support for local Government to significantly increase emission reduction work, including through District and Long-Term Plans and strategic partnerships with central Government.
 - b. Encouraging proven ways to reduce emissions at source including incentives for households, businesses and farms to decarbonise.
 - c. Supporting low carbon travel options: electric vehicles, electric public transport, walking and cycling.
 - d. Demonstrating how the Government will provide climate leadership (e.g., the Carbon Neutral Government Programme).
 - e. Establishing methods to recognise and reward indigenous biodiversity-based sequestration.

Section B. General Christchurch City Council feedback on the Plan

6. We support the Government's stated commitment to meeting New Zealand's 2050 emission reduction targets. It is vital that we play our part and join global efforts to limit the worst effects of climate change for current and future generations. Therefore, it is vital that planned actions achieve our targets. Missing our targets will expose our country to additional risks and costs. We want to see a bold and robust transition pathway with specific actions that reach our targets. Delaying action to decarbonise our economy risks a steeper and more disruptive transformation. Likewise, a reliance on international offsetting to meet our international commitments will expose New Zealand to significant costs which could be reduced through greater domestic action.
7. Our Council remains willing to work with Central Government to take climate action that benefits our community, economy and environment. However, the role of local Government was barely recognised within the Plan (only mentioned twice). Given the Plan proposes policies around core council activities such as public transport and waste management, greater emphasis on working with local Government would be beneficial to the success of the Plan.
8. We support adopting an innovation and opportunities-based approach to addressing our climate challenges. Innovating and boldly investing in climate solutions can deliver numerous, far-reaching and enduring benefits for our community. Kiwis are highly inventive and collaborative and can deliver many of the solutions needed here and abroad. New Zealand will benefit from being a climate leader offering solutions and providing quality and trusted products to the world. Consequently, it will be important to develop and invest in collaborative partnerships to rapidly develop and deliver solutions.
9. There are many proposals within the Plan that our Council supports such as: decarbonising public transport, increasing renewable energy, better utilisation of our organic resources and sustainable fuels for air and sea transport (provided these are genuinely sustainable). However, the majority of the Plan currently lacks clarity around most of the action proposed. As an example, Appendix 2 lists action proposed in this Plan. Most of the proposals are very general and vague (e.g., address barriers or develop predictable regulations). This does not provide confidence that actions are clear, meaningful or will be

implemented. The Plan would benefit from greater certainty and clarity about the actions proposed by Government, and who would be responsible for leading the delivery of the actions.

10. Our Council supports a core approach that is referenced throughout this Plan which is to have clear, consistent and aligned Government policies driving climate action. It is important for decision making and long-term investments to have this certainty. However, recent Government actions seem inconsistent with this. For example, Appendix 3 lists 35 specific actions that have been dropped by this Government, such as the Climate Emergency Response Fund, Incentives for Electric Vehicles and the Decarbonising Industries Fund. In addition, reversing the ban on oil and gas exploration and exploring the lowering of insulation standards for homes appear to be inconsistent with achieving national climate targets. Effective climate responses will require a consistent and sustained whole-of-Government approach.
11. Our Council supports making enhancements to the ETS to encourage decarbonisation by sending effective price signals across the economy. However, this Plan has an over reliance on the ETS as a driver of change. Section 3 of the Plan explains that the ETS could become ineffective, largely because the price of carbon will fall to the level effectively set by exotic afforestation (around \$60 per tonne of carbon), which will not be sufficient to encourage gross emission reductions in most sectors. The Government is also delaying the entry of agriculture into the ETS by five years, meaning that a significant portion of New Zealand's emissions are not managed by this method. These represent fatal flaws with the Government's current approach and are projected to result in New Zealand missing its third emissions budget (2031 to 2035) and its 2050 target. In addition to the ETS, New Zealand should directly invest in the solutions needed to reduce all emission sources to reach our targets.
12. We understand that some removals (offsetting) of residual emissions will be needed to meet our 2050 carbon neutral target. We favour emission reductions wherever viable, and strongly favour investing in domestic emission reductions so New Zealanders can benefit from the solutions delivered. An over reliance on international offsetting will expose our country to significant risks and costs and may not result in the credible emission reductions our climate needs. In addition, this Plan has an over reliance on carbon removals through forestry grown in New Zealand. Planting trees only buys us time; we must still reduce emissions because our need for carbon reductions will not stop at 2050.
13. Our Council supports investing in climate related innovation and technologies so our community and economy can benefit from these solutions. However, this Plan has an over reliance on technologies that do not currently exist or, at best, will take time to be fully implemented (e.g., carbon capture and storage, biogenic methane inhibitors and sustainable aviation and marine fuels). This represents a risk to achieving the emission reduction budgets and targets. We encourage this Government to fully deliver proven and reliable methods to reduce emissions.
14. In this Plan there is no mention of education to support behaviour change. Encouraging people and businesses to reduce their carbon footprint and letting them know the most effective way to do so, is an important action. Additional resources should be allocated to allow Central Government and Local Government to undertake further education and behaviour change activities for the community and businesses.

15. The Plan does not address the skills and labour needed to deliver the transformations proposed by the Plan. For example, doubling renewable energy generation in New Zealand as proposed by the Government, would require a significant increase in skilled labour. We support creating new jobs through our climate actions, and this needs to be planned and resourced.
16. Our Council supports a just transition to a thriving, low emissions and resilient economy. The Plan does not address equity aspects and the removal of the Just Transitions Programme led by MBIE could mean the Government may miss opportunities to fairly share the costs and benefits across all New Zealanders.
17. Through recent public surveys undertaken in Christchurch (e.g., The Life In Christchurch Survey 2024) we have found that our community supports bold climate action and wants to see climate leadership from central Government, local Government and business. We encourage Government to be bold and take the necessary steps to achieve our targets. As an example, there is no mention within the Plan of central Government leadership on climate change such as the Carbon Neutral Government Programme. And there is no mention of strengthening national targets based on the latest climate science that shows more action is needed from countries throughout the world. This Plan represents a reduction in action and ambition when compared to previous plans.

Section C. Sector specific feedback

C1. Transport (Section 6, pages 59 to 67 of the Plan)

Integrated land-use and transport planning

18. The Plan has no mention of the urban form transformations needed to lock in emission reductions and to underpin public transport, walking and cycling efforts. We would welcome discussions with Government about policies that enable integrated land-use and transport planning.

Electric vehicles

19. Our Council supports the installation of electric charging points in strategic places throughout New Zealand. Government should be aware that most of our light vehicle emissions arise from daily commuting and most people charge their electric vehicles at home. Most trips in Christchurch (60%) are less than 6 kilometres in length, so are well within the range for electric vehicles. We do not consider “range anxiety” to be a key barrier for our city’s commuters.
20. Following the removal of Government incentives for electric vehicles, registrations in Christchurch have plummeted by 97% from a peak of 1,770 per month in August 2022 to 43 in April ([Smart View Emissions Tracker](#)). Installing charging stations will not result in a significant increase in electric vehicle purchases in the near-term because the key barrier remains the initial capital purchase price. Now the Government has introduced Road User Changes, even less incentive exists to choose an electric car. Charging infrastructure benefits people who have already purchased an electric vehicle. If New Zealand is going to reduce transport emissions (one of our largest emission sources), further measures will be needed.

Public transport

21. Our Council supports Government funding to decarbonise public transport vehicles (e.g., 2024 Government Budget allocation of \$44.721 million over four years). However, all public transport infrastructure enhancements appear to be planned for the North Island and none in the South Island. We would like to partner with Central Government on plans in Greater Christchurch to enhance public transport services and infrastructure.
22. We are seeing strong growth in public transport use in Christchurch and expect this to accelerate in future with further policy changes such as more transit-oriented development, business growth in the central city and higher fuel prices. The city developed an agreed investment plan to improve public transport in the city. Christchurch City Council requests that the Greater Christchurch Public Transport Futures and Mass Rapid Transit projects are included in the Emission Reduction Plan to reflect the national importance of these projects, and how far they are already progressed.
23. Because of the rapid urban development taking place, we have a narrowing window of opportunity to deliver public transport improvements at scale in Greater Christchurch without the widescale disruption that retrofitting would cause later. This requires the commitment of all partners, including Central Government, to progress with some urgency.

Walking, cycling and micromobility

24. The Plan has no mention of walking and cycling or opportunities to encourage electric bicycles, micro-mobility, vehicle sharing services or ways to remove old vehicles from our roads. Public transport, walking and cycling are fundamental approaches for reducing emissions, while supporting affordable mobility and choice for residents. We are already seeing increases in people cycling and scootering in Christchurch as we make changes to our urban form and mobility networks.
25. The discussion document states the core principle of reducing emissions at least cost. The limited set of transport actions within the discussion document do not align with this principle. For instance, we know that walking and cycling improvements reduce carbon for relatively little cost, while delivering significant health and wellbeing benefits. We support a broader suite of interventions being included in the Plan, especially the lowest cost ones such as walking and cycling improvements.

Shipping, freight and aviation

26. Our Council supports the need for sustainable aviation and marine fuels provided that these are genuinely sustainable and that whole of life assessments are included to ensure that emissions are managed throughout the process of fuel production and use.
27. Christchurch is an innovation hub for low emission transport (e.g., solar and electric flight) and clean technologies (e.g., hydrogen and biogas generation) as demonstrated in the [Christchurch NZ Business Clusters](#). Lyttleton Port is also exploring decarbonising its port operations and charging infrastructure for shipping. We welcome conversations with Central Government about how to further encourage action and/or investment for growth in these sectors.

28. Our Council would like to see a national infrastructure strategy for shipping, freight and aviation. This could align infrastructure projects across the country, such as air and sea ports, to avoid any unnecessary emissions, minimise costs and ensure that low-emission options are prioritised.

C2. Energy (Section 5, pages 48 to 58 of the Plan)

Renewable energy and flexibility

29. Our Council supports increasing the amount of renewable energy generation in New Zealand, combined with decarbonising our national electricity grid and improving energy efficiency and flexibility. Having a diversity of renewable energy sources throughout the country will strengthen our resilience and self-reliance. It will also make it much easier for our Council and community to decarbonise in using energy sources.

30. The Plan would benefit from a greater emphasis on energy efficiency and demand flexibility. As our homes, businesses and vehicles become electrified, and to manage peaks in energy demand, smarter use of energy will be needed. To decarbonise the grid, we must additionally focus on seasonal storage and renewable energy patterns that match demand. Effective demand control is crucial for maintaining the network, and load shedding in buildings can help manage peak loads (times when fossil fuels are currently used to meet peak demand).

Electrification of homes and businesses

31. Our Council supports the “Electrify NZ” concept proposed in the Plan (e.g., electric space heating, water heating, cooking and vehicles). According to the [2024 Rewiring Aotearoa Electrifying Homes Report](#) electrification will deliver significant cost savings and emission reductions. New Zealand is well placed to lead the world in the smart use of clean, affordable, reliable and resilient electricity. Upfront capital costs and low levels of awareness about the benefits / value case remain key barriers to this transition. The Plan would benefit from addressing these barriers and the interconnections between decentralised renewable energy (e.g. rooftop solar) and enhanced resilience to natural hazards and extreme weather events.

Energy transition planning

32. Our Council supports regional energy transition planning to align partners around key opportunities in each region. The Canterbury Mayoral Forum is leading work on this in our region and would welcome Government support for our key energy transitions.

33. Our Council supports the use of fast-track legislation to encourage the rapid deployment of renewable energy and decarbonisation solutions. Our Council is not in favour of using this legislation to enable high emitting activities, such as mining and the expansion of fossil fuel operations in New Zealand.

34. Expanding oil and gas production is inconsistent with reaching our emissions goals.

35. A reliance on carbon capture and storage technologies that are currently unproven, uneconomic, and at best will take a long time to deliver at scale, undermines the credibility of this Plan.

Tree planting near electric lines

36. Our Council wishes to be involved in the drafting of any new standards on how close trees can be planted near energy infrastructure. While we understand that extreme weather events can impact powerlines, we also have an Urban Forest Plan and Tree Policy aiming to increase the tree canopy throughout our city. Urban trees deliver many benefits for our community and environment and these proposed rules could impact our city.

C3. Waste (Section 10, pages 87 to 92 of the Plan)

Organic waste disposal and landfill gas capture

37. Our Council supports the proposal to review the scope of landfills that require Landfill Gas (LFG) capture systems and improve settings to raise the average LFG capture efficiency. We recommend that LFG capture systems and improvements to existing systems be mandated across all Class 1 Facilities.
38. We also support improving ETS accounting, but the methodology for calculating LFG surrender obligations must be consistent. At present, the use of both unique and default emission factors leads to significant variation in surrender obligation reporting, despite similar waste inputs to different sites. We recommend that disposal facility operators are brought together to determine actual versus perceived / misinterpreted reporting requirements.
39. Our Council also supports improvements to organic waste processing. Improving processing capacity across the country will require infrastructure investment from central Government, particularly for smaller, more remote communities.

Product Stewardship

40. Our Council supports a product stewardship approach to enhancing resource recovery across New Zealand. Product stewardship internalises the environmental and social costs of goods and services entering the market, reflecting them in sales prices. It would shift businesses toward service models, holding them accountable for resource use and emissions throughout the product lifecycle, rather than transferring this responsibility and harm to the community.
41. The resource recovery sector in New Zealand needs a combination of private and public sector investment. Advancing a mandatory product stewardship scheme would create investment certainty and reduce reliance on community funding and fluctuating recycling commodity prices.
42. Additionally, the waste disposal levy has been redirected to broader environmental projects, reducing funds for waste infrastructure. This approach should be reviewed alongside New Zealand's waste strategy priorities, as infrastructure investment depends on the policy framework guiding resource recovery.

C4. Farming and Forestry (Section 7 and 8, pages 68 to 82 of the Plan)

Agriculture

43. Our Council understands that farmers need practical and viable solutions to enable their transition to low emission productive systems. However, a five-year delay on pricing agricultural emissions in the ETS will lower the incentive to innovate and adopt best practice and undermine our ability to reach our national targets. New Zealand has much to gain from being a leader in sustainable production systems and technologies. Many solutions exist now and should be fully deployed to meet the growing needs of our

markets for sustainable products.

44. Our Council supports the goal of being a global leader in sustainable production systems and technologies, however greater investment is likely required. The Plan fails to mention how the Government will support solutions to be rapidly deployed and adopted by farmers.
45. Nitrogen fertiliser importers and manufacturers could be entered into the ETS now, instead of waiting for an alternative agricultural emissions pricing scheme. There are few barriers to this, as fertiliser manufacturers already report associated emissions. Revenue could be used to fund the development and uptake of further mitigation technologies and practices.
46. Our Council supports regenerative farming practices because of the wide range of benefits this provides. We encourage the Government to support the uptake of more sustainable and low emission farming practices.

Forestry

47. Our Council supports planting and maintaining permanent native vegetation to remove carbon as this delivers many other benefits including biodiversity and resilience to disease, water quality, land stability, enhanced natural landscape character, and recreation. The co-benefits of managing land to enable the passive regeneration of indigenous forest (where appropriate) to sequester carbon should not be overlooked. New ways to recognise and reward (monetise) the benefits delivered by native forests are needed to balance the ETS incentives offered to fast-growing exotic plantations, such as biodiversity credits or additional incentives offered through the ETS.
48. Exotic forestry has a role to play in sequestering emissions. However, our Council supports additional regulations on new exotic forestry plantations to help manage their impacts (e.g., wilding pines, tree slash entering waterways, and erosion following harvest) This would aim to ensure that the right trees are planted in the right places for the right purpose. Mass roll out of monoculture tree species without consideration of the local context and ongoing management presents significant risks to climate resilience (wildfire, disease, drought, and severe storms). There is evidence to show that New Zealand is increasingly exposed to these risks because of climate change. In addition, the benefits of pine plantations must be balanced by the cost of managing wilding pines. Exploring ways these external costs can be included within the forestry production system would address a systemic issue for New Zealand, where the costs are borne by the community, local and central Government.
49. Our Council also supports the inclusion of non-forest removal sources (including blue carbon, wetlands, peat lands and biochar) if they can be proven to meet science based, proven, best practice standards for measuring and reporting carbon removals. We recommend that the Government explores national guidance for promoting, measuring and reporting on such sequestration opportunities.

Land use

50. The Plan fails to discuss land-use change beyond whole-farm exotic forestry conversion. Our Council would like to see a clearer national strategy for land use that considers the risks and benefits of different land uses in different locations. Diversifying land use, i.e., converting some pasture into cropland, native vegetation, or horticulture, offers an opportunity to reduce emissions, build climate resilience, diversify

income and produce higher value primary products, and minimise risks associated with monoculture. Investment will be required to identify suitable options for land use diversification, and to address any barriers to enabling different production types.

C5. Emissions Trading Scheme and climate financing (Section 3 and 4, pages 36 to 46 of the Plan)

51. Our Council is concerned that this Plan has an over reliance on the ETS as a driver of change. Government should prioritise gross emissions reductions over removals. The Plan recognises in Section 3 that from the mid-2030s onwards the ETS may not deliver the needed reductions or removals to meet our net zero target. The recent failure of national auctions to sell carbon credits to the New Zealand market already shows the limitations of the ETS. Consequently, refinements to the ETS and a wider range of measures to reduce emissions will be needed.

52. The Government has made the assertion throughout the Plan that emission reductions will only be a cost to society. The analysis appears not to fully account for the tangible benefits of early and robust climate action. Numerous benefits will arise by New Zealand taking a leadership position on climate change and selling our solutions and sustainable products to a world demanding these. There are numerous opportunities in a low-carbon economy. Likewise, emission reductions can deliver many widespread and far-reaching benefits. For example, reducing transport emissions also improves air and water quality, reduces noise and congestion, and significantly enhances public health. Energy efficiency measures save money as well as greenhouse gas emissions. The more we reduce emissions now, the less we will spend on adaptation measures later. By focusing on carbon removal via trees instead of the full range of emission reduction measures available to us, these additional benefits will not be realised.

Conclusion

53. We recommend the Government amends the Plan to include bold and robust actions to reduce emissions that meet New Zealand's emission reduction targets.

Thank you for the opportunity to share our feedback on the draft Plan.

For any clarification on points within this submission please contact Tony Moore, Principal Advisor Climate Resilience on Tony.Moore@ccc.govt.nz

Yours faithfully



Phil Mauger
Mayor of Christchurch