

21st August 2024
Attn: Ministry for the Environment
Environment House
Wellington 6143

Wellington City Council submission on the proposed second emissions reduction plan for New Zealand Ta Aotearoa mahere whakeheke tukunga tuarua

The Wellington City Council (WCC) welcomes the opportunity to provide further input into the development of the government's second national emission reduction plan.

This will be a critical document for guiding New Zealand's transition to a zero-carbon society. As a country we need a clear vision and road map to achieve our 2030 and 2050 goals. A well-designed policy package with clear expectations will allow us all to undertake our role – as households, businesses, local government – in this collective endeavour.

The recently released Climate Change Commission monitoring report on emissions reductions highlights that although emissions have dropped over recent years this was largely a result of factors outside of government control, such as good hydro conditions, high fossil fuel prices, and general economic conditions and that the rate of emissions reductions is unlikely to continue. The report emphasises that there is now significant risk that the country won't meet future emissions budgets stating, *"There is an urgent need to ensure Aotearoa New Zealand's climate policies will put the country on track."*

The Council has concerns with the proposed plans in three areas. First, there is over reliance placed on the ETS to deliver the 'heavy lifting' in terms of directing the market through a price mechanism to make more sustainable choices. Secondly, there is an assumption that technical solutions will be developed to significantly reduce emissions in several areas such as agriculture. And lastly, there is an overreliance on forest planting to sequester (fix carbon) to achieve a net zero position by 2050, without due regard to the risks associated with this plan such as reduced growth rates and increased fire risk caused by a changing climate.

In terms of the ETS, the Climate Change Commission's recent monitoring report has indicated a significant surplus of credits, suggesting that the cap on total emissions is not functioning as effectively as intended. We recommend that the government put in place policies to ensure the price of carbon is higher, and the quantity is firmly capped.

At a local level, we are most concerned about central government support for reducing emissions in the transport and built environment sectors. We agree with the Climate Change Commission's analysis that "current policy tools on their own are unlikely to drive a shift to lower-carbon modes of transport and to decarbonise freight and aviation. Alongside this is a risk that uptake of low and zero emissions light vehicles will fall behind benchmark levels due to reduced policy support." and "The existing regulatory system does not sufficiently support or require emissions reductions in new or existing buildings."

We would encourage clarity on how climate change considerations will be incorporated into the urban planning framework, alignment of the GPS on Land Transport with reducing emissions, significantly more investment in public and active transport networks, acceleration of the 'Building for climate

change programme', and recognition of the emission reduction benefits of supporting a circular economy model.

Relying on the NZ ETS as the key lever for emissions reductions creates unequal impacts across different sectors of society. Council would also like to see more policy and funding for complimentary policies that address these impacts. For example, rising carbon prices in the ETS will raise the price of petrol, and without supporting policies that enable low-income households to access alternative modes of transport this will add to the cost of living without reducing transport emissions. Income from the NZ ETS should be ring-fenced to fund supporting initiatives, such as increased investment in public and active transport, and support for low-income households to electrify their energy needs. We would also like to see the Climate Action Hub funded so our residents have access to quality information on effective emissions reduction options.

Wellingtonians are ready to be part of the solution. The more we can be supported to act by central government the more we can do. Wellington City's own climate goals are to cut emissions by 57% by 2030 and to net-zero by 2050. We have limited land for forestry regeneration. Our focus must remain on driving down gross emissions and not being reliant on sequestration to meet our targets. This aligns with our residents' level of concerns and expectations. In our 2023 survey, 84% of residents considered climate change impacts are already being felt in our capital city and over half of Wellingtonians tell us that significant reductions are needed right now.

As a city we have already started doing what we can to set a path to net-zero. Valuing our compact urban environment and highly utilised rail and bus network, we are building on this advantage by:

- focusing new development within walking distance of the city and public transport routes (via our a spatial and District Plan).
- improving the Golden Mile to prioritise pedestrians, buses and bikes.
- investing \$107m in a city-wide bike network.
- investigating a new plan to create a low-traffic central city to reduce emission and bring more people into the heart of the city.

We are also investing significantly in reducing emissions from Wellington's waste, with the building of a sludge processing facility at Moa Point, and inclusion of the kerbside collection of organics in our recent Long-Term Plan. In our own operations we are transitioning our vehicles to electric and replacing fossil gas systems in our swimming pools with heat pump technology.

We are ambitious, but our ability to act and meet the scale of change needed also requires much greater central government action, regulation and funding.

We would welcome the opportunity to work with central government on how it can best support local government to deliver on the second and third emissions budgets. Please do not hesitate to reach out to our Climate Change Response team via alison.howard@wcc.govt.nz.

Yours sincerely



Tory Whanau
Mayor of Wellington

**WCC Submission on New Zealand’s second emissions reduction plan (2026–30): Tā Aotearoa mahere whakaheke tukunga tuarua
Ministry for the Environment 2024 Consultation**

Section	Question	Answer
Submitter details	1. Name	Wellington City Council
	2. Email	Mike.Sammons@wcc.govt.nz
	3. Are you submitting as an individual or on behalf of an organisation?	Organisation
	4. Which region are you in?	Wellington Te Whanganui-a-Tara
	5. Please choose any you are associated with:	Local/regional government
General consultation questions	0.1. What do you think is working well in New Zealand to reduce our emissions and achieve the 2050 net zero target?	<p>New Zealand has a high percentage of renewable energy in its electricity generation mix, primarily from hydropower, geothermal, and wind sources. The government aims to have 100% renewable electricity by 2030 which could significantly contribute to reducing emissions.</p> <p>New Zealand has established a robust emissions reduction framework, which provides a structured approach to reducing greenhouse gas emissions across various sectors. This framework sets clear targets and timelines, ensuring accountability and facilitating progress monitoring.</p> <p>New Zealand has its own Emissions Trading Scheme (ETS) which is a cornerstone of the country's climate policy. By capping the total emissions and allowing trading of emission units, the ETS encourages companies to innovate and invest in cleaner technologies. However, the Climate Change Commission's recent monitoring report has indicated a significant surplus of credits, suggesting that the cap on total emissions is not functioning as effectively as intended.</p> <p>New Zealand has established Climate Change Commission that plays a crucial role in advising the government on climate policies. It provides independent, evidence-based recommendations to ensure that New Zealand stays on track to meet its emissions budgets and net-zero target. The Commission's regular assessments help identify areas for improvement and highlight successful initiatives.</p>

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		<p>The mandatory carbon disclosure standard for listed companies will ensure the integration of climate considerations into business models and strategies, enabling the business sector to understand the benefits of urgent emissions reduction, and how that can be achieved in their sector.</p>
	<p>0.2. The Government is taking a 'net-based approach' that uses both emissions reductions and removals to reduce overall emissions in the atmosphere (rather than an approach that focuses only on reducing emissions at the source). A net-based approach is helpful for managing emissions in a cost-effective way that helps grow the economy and increase productivity in New Zealand.</p> <p>What do you see as the key advantages of taking a net-based approach?</p> <p>What do you see as the key challenges to taking a net-based approach?</p>	<p>Key Advantages:</p> <p>We disagree with the government's assessment that the key advantage of a net-based approach is that we avoid "shutting down productive sectors of the economy to meet emissions targets". The Climate Change Commission, along with several industry bodies, the Sustainable Business Council, the Sustainable Business Network and the Climate Leaders Coalition all agree that it is not only possible to reduce emissions in a way that delivers long-term economic prosperity, but also point out that without significant urgent global shared emissions reductions, we will not be able to economically thrive as we will have lost climate stability. Maintaining climate stability must be a priority, to enable a thriving low-carbon resilient economy to be financially sustainable over time.</p> <p>The only advantage of a net-based approach that we have identified is that promoting forestry projects can improve land use practices, enhance biodiversity (when natives are planted), and provide co-benefits such as soil health improvement and water retention.</p> <p>Key Challenges:</p> <p>The Climate Change Commission's first annual monitoring report noted that the best way to meet and sustain 'net zero' is by cutting gross emissions because the recent information received by them indicates a potential underestimation of deforestation rates, which might affect the ability to meet emissions budgets and targets.</p> <p>Relying on forestry to deliver sequestration and a net-based approach is inherently risky and was always intended to buy time in which sector transformation could be achieved. Natural processes like forest carbon sequestration can be unpredictable and affected by factors such as climate change (growth rates and fire risk), pests, and diseases. Balancing various interests, such as those of agricultural producers, foresters, and industrial and transport emitters, may lead to conflicts to ensure fairness and effectiveness. Relying on carbon markets and trading mechanisms may introduce economic risks, such as price volatility and market manipulation. Some emissions reduction technologies may still be in early developmental stages and/or prohibitively expensive – a net-based approach could limit their development and large-scale deployment. Encouraging individuals and</p>

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		<p>businesses to adopt low or zero carbon options and technologies could be challenging if they consider that sequestration will deliver the required emission reductions.</p> <p>Wellington City Council aims to maximise gross emissions reductions until 2049 and use forestry offsets as a last resort in 2050 to achieve the city's net-zero target. This strategy directly addresses underlying emission sources, fosters innovation, drives economic growth, and creates jobs. Importantly, the limited land available for future plantations means the city cannot rely on forestry to offset remaining emissions by 2050.</p>
	<p>0.3. What, if any, other sectors or areas do you think have significant opportunities for cost-effective emissions reduction?</p> <p>The current proposed policies in the ERP2 discussion document cover the following sectors and areas:</p> <ul style="list-style-type: none"> • strengthening the New Zealand Emissions Trading Scheme • private investment in climate change • energy sector • transport sector • agriculture sector • forestry and wood-processing sector • non-forestry removals • waste sector. 	<p>While we understand that the legislation requires a sector-based approach, there is also a need to consider system wide opportunities. For example, this approach is focused on supply rather than demand. The assumption is that the needs of the NZ economy are a given, and that various sectors need to find low/zero carbon ways of meeting those needs. It would be more efficient to consider whether those needs could be met in different ways, or which of those needs are less required than others. This could lead to some sectors needing to expand and others to shrink, with a more efficient allocation of carbon across the economy.</p> <p>In terms of sectors, there are a few additional ones that could be considered:</p> <ul style="list-style-type: none"> - Water Management (treatment, retention, consumption, distribution etc.) - Tourism (promoting local tourism, regulating cruise ships, and encouraging sustainable tourism practices e.g. carbon offset programs, low-carbon accommodation and travel options etc.) - Industrial Processes Sector (regulating building and construction industries, food and meat processing industries, ICT industries, chemicals, cement, and steel production industries etc.).

Section	Question	Answer
	<p>0.4. What Māori- and iwi-led action to reduce emissions could benefit from government support?</p> <p>There are additional questions about Māori- and iwi-led action to reduce emissions and impacts of proposed ERP2 policies on Māori and iwi in chapters 1 and 12.</p>	<p>Note that this question is best answered by our mana whenua partners. The Council acknowledges its mana whenua partners Taranaki Whānui ki te Upoko o te Ika, Te Rūnanga o Toa Rangatira and Te Rūnanganui o Te Āti Awa ki te Upoko o Te Ika a Māui.</p> <p>As a Council, our view is that early and regular engagement with mana whenua and māori needs to be established to explore their aspirations and concerns. As a Council we are committed to supporting mana whenua and Māori-led climate action and welcome opportunities to integrate mātauranga Māori local responses to climate change.</p>
	Upload your PDF here	Upload cover letter
Chapter 1: Our approach to New Zealand's climate change response Tā mātou e whai nei e pā ana ki tā Aotearoa urupare ki te panoni āhuarangi	<p>1.1. What opportunities do the proposed initiatives and policies across the sectors offer for Māori- and iwi-led action to reduce emissions?</p> <p>1.2. What additional opportunities do you think the Government should consider?</p>	<p>Note that this question is best answered by our mana whenua partners. The Council acknowledges its mana whenua partners Taranaki Whānui ki te Upoko o te Ika, Te Rūnanga o Toa Rangatira and Te Rūnanganui o Te Āti Awa ki te Upoko o Te Ika a Māui.</p> <p>As a Council, our view is that early and regular engagement with mana whenua and māori needs to be established to explore their aspirations and concerns. As a Council we are committed to supporting mana whenua and Māori-led climate action and welcome opportunities to integrate mātauranga Māori local responses to climate change.</p>
Chapter 2: Tracking our progress towards meeting	2.1. Current modelling suggests that with a changed approach, the first emissions reduction plan is	There is no detail on how cancelled policies effect projections, so it is difficult to comment. And changes to the first emissions reduction plan have a higher risk to our ability to meet the second and third emissions budgets than they do to the first emissions reduction budget.

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emissions budgets Te aroturuki i tō tātou koke i te ara whakatutuki i ngā tahua tukunga	still sufficient to meet the first emissions budget. What, if any, other impacts or consequences of the Government’s approach to meeting the first emissions budget should the Government be aware of?	That said, the changes undermine some easy wins – for example, the removal of the clean car discount has stopped momentum on the decarbonisation of the passenger vehicle fleet, and cancellation of the Climate Action Hub (Action 3.5.1) reduces the ability for individuals and communities to know what low and zero carbon options are available to them now to lower their emissions.
	2.2. What, if any, are the long-term impacts from the changes to the first emissions reduction plan on meeting future emissions budgets that should be considered through the development of the second emissions reduction plan?	<p>Wellington City has a science-based target to reduce emissions by 57% between FY2020 and FY2030. The second Emissions Reduction Plan, covering the period from 2026 to 2030, is a crucial policy document for achieving this target.</p> <p>One of our key focus areas is transport, as this sector accounts for 56% of the city’s total emissions. However, as Figure 2.2 indicates, the projected emissions reductions from the transport sector under the second emissions budget are only 1%. The lack of policy and investment to support transitioning this sector to low and zero emissions systems will make it impossible for the city to meet its 57% reduction target. Significant investments in walking, cycling, and public transport infrastructure are essential to moving more people with fewer vehicles and achieving these targets.</p> <p>We agree with the Climate Change Commissions analysis in their monitoring report that transport policy settings create moderate risk to achieving the second emissions reduction budget, and recommend strengthening policy settings around:</p> <ul style="list-style-type: none"> - Supporting the uptake of low and zero emissions light vehicles - Strengthening the Clean Car Standard - Introducing road user charges for petrol vehicles - Increasing investment in infrastructure that supports mode shift - Support for low-carbon liquid fuels for road and air travel <p>In addition, the GPS Land Transport needs to support the delivery of significant emissions reductions from the transport sector.</p>

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		<p>In terms of planning and infrastructure, we agree with the Climate Change Commissions analysis in their monitoring report that “changes in early 2024 to policy direction for planning and infrastructure systems have created uncertainty around how climate change will be prioritised under the resource management reform”. It would be great to see clarity on how this will be addressed in the second emissions reduction plan. To achieve emissions reductions, planning and infrastructure settings need to support urban density, as this increases the ability for people living in urban centres to meet their transport needs with public and active transport.</p> <p>Another significant component of Wellington City’s emissions is from energy used in buildings. We note that there have been delays in delivering the Building for Climate Change programme and updating energy efficiency regulations and strategies. It would be good to see these prioritised in the second emissions reduction plan (or progressed sooner). There are also high costs for connecting to the electricity network that create a barrier to the electrification of buildings and transport.</p> <p>Cancellation of the Climate Action Hub will reduce the information available to our residents on effective emissions reduction actions, slowing down the contribution of individuals and community groups. Note that Leeds University estimated that individual action to take up low-carbon lifestyle options in Western countries could reduce global emissions by 25%. This education effort has been taken up by the not-for-profit sector (for example Take the Jump) but lacks the funding needed to reach a wide audience and achieve significant positive impact https://www.takethejump.org.nz/?gad_source=1&gclid=Cj0KCQjwwae1BhC_ARIsAK4JfryzF90oUc026WOLpedNx8-WbrmOIXYIKioiG2EJeAntNBeWpYk7WhQaAuJgEALw_wcB&gclsrc=aw.ds</p> <p>There is also a need to ensure that there is coherence of cross-govt policy to ensure emissions reduction is enabled for sectors with significant emissions. At a minimum, government should ensure that the policy settings for key sectors are not acting in ways that increase emissions. An example of this in practice is the approach being taken in Wales, where all roading projects were reviewed for their impact on the climate emergency, with the bulk of planned roading projects cancelled. https://www.theguardian.com/environment/2023/feb/14/welsh-road-building-projects-stopped-failing-climate-review</p>
Chapter 3: Strengthening	3.1. What else can the Government do to support	The Government need to set the price higher. Additionally, the Climate Change Commission's first annual monitoring report highlighted a substantial and uncertain surplus of units in the NZ ETS. This

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<p>the New Zealand Emissions Trading Scheme Te whakakaha i te Kaupapa Hokohoko Tukunga o Aotearoa</p>	<p>NZ ETS market credibility and ensure the NZ ETS continues to help us to meet our targets and stay within budgets?</p> <p>3.2. What are the potential risks of using the NZ ETS as a key tool to reduce emissions?</p>	<p>surplus creates significant uncertainty regarding the number of units available for emitters in the coming years. The ETS needs to be firmly capped, to ensure that in addition to enabling economically efficient emissions reduction, the reductions are also sufficient to support achievement of budgets due to restrictions on the number of available units.</p> <p>We agree with the following points from the Climate Change Commission's first annual monitoring report:</p> <ul style="list-style-type: none"> • Emissions pricing, if designed well, can be a powerful tool for reducing emissions – but it has limitations. Some sectors have characteristics that impact how effective emissions pricing can be, and some features of the NZ ETS also reduce its ability to drive emission reductions. • In some sectors, including transport, buildings, and urban form, there are also various barriers such as high up-front capital costs, lock-in to existing systems or infrastructure, and lack of readily available or affordable low emissions options. These make it difficult for pricing to influence choices about emitting activities. The NZ ETS by itself is also less likely to drive change in parts of industry where transformation at scale to entirely new technologies is needed. • The NZ ETS will work better when it is part of a cohesive package of policies that addresses the full range of market failures and barriers and helps generate more low emissions options. This approach will enable people and businesses to better respond to the emissions price, improve the prospects of meeting the emissions budgets, and help support a more cost-effective and durable transition to a low emissions economy. • Modelling undertaken by the Commission in 2022 found that with weaker complementary policies, emissions prices may need to rise potentially to upwards of NZ\$300 by 2030. <p>Relying on the ETS as the key tool to reduce emissions risks not being able to meet the second and third emissions budgets, and more importantly, risks missing the opportunity to transition cost-effectively and durably to a low emissions economy, leaving us uncompetitive in international markets.</p> <p>In addition, an ETS has limitations:</p> <ul style="list-style-type: none"> - The price of carbon credits can be volatile, leading to uncertainty for businesses. This can make it difficult for companies to plan long-term investments in low-carbon technologies.

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		<ul style="list-style-type: none"> - The cost of carbon pricing may disproportionately affect low-income households. Without adequate complementary policy positions to protect vulnerable populations, this could lead to increased social inequality. - Without cross-party agreements, policies and regulations related to the NZ ETS could change periodically which could affect the stability and predictability of the NZ ETS. Businesses need consistent and clear long-term policies to invest confidently in emission reduction technologies. - An increased price of carbon does not have a strong impact on household behaviours unless the price is significantly high, which then requires additional policies to address the distributional impacts. Residents in Wellington need to be provided with alternatives to high-carbon lifestyles (for example, a compact city with affordable public transport and safe active transport options).
	<p>3.3. How can the Government manage these risks of using the NZ ETS as the key lever to reduce emissions?</p>	<p>Develop a more comprehensive range of complementary policies. For example, in the transport, buildings, and urban form sectors, there are various barriers such as high up-front capital costs, lock-in to existing systems or infrastructure, and lack of readily available or affordable low emissions options. These make it difficult for pricing to influence choices about emitting activities. The NZ ETS by itself is also less likely to drive change in parts of industry where transformation at scale to entirely new technologies is needed.</p> <p>Complementary policy positions to protect vulnerable populations. The suggestion in the discussion document that “the Government’s ‘climate dividend’ tax relief – continuing to return money from NZ ETS revenue to the hands of New Zealanders to meet additional costs related to climate change mitigation” is not a good example. While this reduces the distributional impacts, it nullifies the price signal and impacts the effectiveness of the NZ ETS as the key lever to reduce emissions. A better policy solution would be to use income from the NZ ETS to target support to households impacted by rising energy costs, to electrify their households. Modelling from Rewiring Aotearoa demonstrates that targeted assistance schemes could resolve distributional impacts, achieve significant emissions reductions from household energy consumption, and lower living costs.</p>
	<p>3.4. Do you support or not support the Government’s approach of looking at other ways to create incentives for carbon</p>	<p>Unsure</p>

Section	Question	Answer
	dioxide removals from forestry, in addition to using the NZ ETS?	
	3.5. Apart from the NZ ETS, what three other main incentives could the Government use to encourage removals through forestry?	No comments
	3.6. Please provide any additional feedback on the Government's thinking about how to use the NZ ETS to reduce emissions.	No additional comments.
Chapter 4: Scaling private investment in climate mitigation Te whakakorahi tā te rāngai	4.1. Do current measures work well to unlock private investment in climate mitigation?	Unsure
	4.2. What are the three main barriers to enabling more private investment in climate mitigation?	This is not a significant consideration for the Council's responsibilities.
	4.3. What are the three main actions the Government can do to enable more private investment in climate mitigation for the next 18 months?	This is not a significant consideration for the Council's responsibilities.
	4.4. What are the three main things the Government can do to	This is not a significant consideration for the Council's responsibilities.

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	enable more private investment in climate mitigation in the longer term (beyond the next 18 months)?	
	4.5. Please provide any additional feedback on the Government’s thinking about how to enable more private investment in climate mitigation for the next 18 months.	No Comments.
Chapter 5: Energy Te pūngao	5.1. What three main barriers/challenges that are not addressed in this chapter do businesses face related to investing in renewable electricity supply (generation and network infrastructure)?	This is not a significant consideration for the Council’s responsibilities.
	5.2. How much will the Government’s approach to driving investment in renewable energy support businesses to switch their energy use during 2026–30 (the second emissions budget period)?	Unsure.
	5.3. What three main barriers/challenges do businesses and households face related to electrifying	We agree with the Climate Change Commission’s first monitoring report that “High costs for connecting to the electricity network, high network charges, and first mover disadvantage could deter switching from fossil fuels to electricity as an energy source. Prioritising putting policies or regulatory

Section	Question	Answer
	<p>or improving energy efficiency, in addition to those already covered in the discussion document?</p>	<p>incentives in place to adequately address these issues will help to reduce the overall cost and reduce any risk to the pace of electrification.”</p> <p>Generally, there is currently a lack of accessible information which would make it easier for businesses to plan to electrify. For example, up to date information about the cost of energy, the capital cost to install equipment, or available local network capacity. This last area is improving significantly, eg via EECA’s RETA program and GENLESS.</p> <p>Capital – Energy efficiency/electrification projects generally provide a positive financial return over the life of a project; however, the initial capital can be prohibitive.</p>
	<p>5.4. How much will existing policies support private investment in low-emissions fuels and carbon-capture technologies?</p>	<p>Unsure.</p>
	<p>5.5. What three main additional actions could the Government do to enable businesses to take up low-emissions fuels and carbon-capture technology?</p>	<p>To enable businesses to take up low-emission fuels:</p> <ul style="list-style-type: none"> - Encourage a shift in the transmission and distribution price structure to variable time-based pricing from ‘flat’ rates. This would better allow consumers to interact with the energy market via load shifting, enabling another avenue for customers to realise cost savings. This would therefore further improve the affordability of electricity relative to other fuel options. - Enhance the sharing of information; in most instances the necessary technology for electrification is already present at a cost that makes it viable to do so. However, this does not seem to be as widely known as it should be. Moreover, better sharing of information regarding local network capacity and consumption would allow for improved planning, both for customers and EDB’s.
	<p>5.6. If you are an electricity generator, please explain and/or provide evidence of how Electrify NZ could affect projects already planned or underway.</p>	<p>No comments.</p>
	<p>5.7. If you are an electricity generator, please explain</p>	<p>No comments.</p>

Section	Question	Answer
	and/or provide evidence of how Electrify NZ could increase the likelihood that new projects will be investigated.	
	5.8. Please provide any additional feedback on the Government’s proposals to reduce emissions in the energy sector and the industrial processes and product use sector.	No comments.
Chapter 6: Transport Te tūnuku	6.1. Do you support the proposed actions to enable EV charging infrastructure?	Yes, I support
	6.2. What are the three main actions the Government can do to reduce barriers to and enable the development of a more extensive public EV charging infrastructure in New Zealand (without adding too much cost for households and businesses)?	<p>First Action:</p> <p>A higher level of collaboration between local government, electricity distribution boards and infrastructure providers is essential. Local government, as road controlling and planning authorities , are a key stakeholder in the development of charging networks. The role of local government needs to be clarified, following from the 2023 Charging our Future document.</p> <p>Second Action:</p> <p>The role of local government is vital in the development of infrastructure on the road corridors, as their road assets ownership is vast and they are the road controlling authority. Therefore, more guidance is required for local government to set up cost-effective partnerships with infrastructure providers, including agreements (whether licences to occupy or other). While the role of private sector is critical to deliver the required infrastructure, it may fall on councils to deliver chargers to ensure coverage and so more confident user uptake, particularly where the returns of investment do not attract private investments. This will either cost councils, or further disadvantage communities who cannot access</p>

Section	Question	Answer
		<p>publicly available infrastructure. Clarification on the roles and boundaries between local government, national government and the private sector are sought to ensure that planning and delivery of the vision can be achieved in line with local planning requirements. The implementation of electric charging infrastructure is a new venture to most local government bodies and as such, there is a lack of resource, skills and knowledge in local government to develop fit-for-purpose systems.</p> <p>Third Action</p> <p>Any new planning requirements for urban areas needs to consider the practical impacts of the use of public road corridors in urban environments, and how to effectively work with private investors in the development of a comprehensive network across a region, which will inevitably include more- and less-profitable locations. In addition to government funding for less profitable EV charging types and/or locations, the government could work with the private sector to bundle charging locations with providers or introduce subsidies to enable investment across an area or region.</p> <p>Further attention is required to identify and allocate space for EV charging infrastructure. Landowner support for EV charging infrastructure is one of the biggest challenges in urban environments. The paucity of suitable space (noting the infrastructure design and vehicle manoeuvrability requirements) combined with the lack of available grid capacity makes feasibility challenging. This could be addressed through requiring large parking facilities (such as malls, large supermarkets or events centres) to have EV charging facilities. The Council supports the introduction of mandatory ratios of resident dwellings/visitors to chargers for new developments while acknowledging this does put costs onto businesses.</p> <p>Better information sharing between electricity distribution boards, local government and infrastructure providers is critical for the short-term future. Without better collaboration on where there is available power and how to enable works, installation in the short-term will be challenging to keep to targets. For longer-term horizons, building for an electrified future is critical. The current electricity distribution boards model is not set up for growing demand of electrical infrastructure. The system incentivises consistency of service above developing capacity for future requirements.</p>

Section	Question	Answer
	6.3. Do you support the Government's proposals to reduce emissions from heavy vehicles?	Yes we support
	6.4. What are the three main actions the Government can do to make it easier to switch to low- and zero-emissions heavy vehicles (without adding too much cost for households and businesses)?	This is not a significant consideration for the Council's responsibilities.
	6.5. Do you support the Government proposals to reduce emissions from aviation and shipping?	Yes we support
	6.6. What opportunities might there be from rolling out new technologies to reduce emissions from aviation and shipping?	This is not a significant consideration for the Council's responsibilities.
	6.7. What are the three main actions the Government can do to make it easier to reduce emissions from aviation and maritime fuels (without adding too much cost for households and businesses)?	This is not a significant consideration for the Council's responsibilities.

Section	Question	Answer
	<p>6.8. Please provide any additional feedback on the Government's thinking about how to reduce emissions in the transport sector.</p>	<p>One of Wellington City Council's key focus areas is transport, as this sector accounts for 56% of the city's total emissions. However, as Figure 2.2 indicates, the projected emissions reductions from the transport sector under the second emissions budget are only 1%. Given the scale of emissions from transport the absence of policy and investment support low and zero emissions systems will make it difficult for New Zealand to meet its emissions targets and especially difficult for urban councils to meet their reduction targets. Significant investments in walking, cycling, and public transport infrastructure are essential to moving more people with fewer vehicles and achieving these targets.</p> <p>We agree with the Climate Change Commissions analysis in their monitoring report that transport policy settings create moderate risk to achieving the second emissions reduction budget, and recommend strengthening policy settings around:</p> <ul style="list-style-type: none"> - Supporting the uptake of low and zero emissions light vehicles - Strengthening the Clean Car Standard - Introducing road user charges for petrol vehicles - Increasing investment in infrastructure that supports mode shift - Support for low-carbon liquid fuels for road and air travel <p>In addition, the GPS Land Transport needs to support the delivery of significant emissions reductions from the transport sector. We suggest that this could be done through measures such as the approach being taken in Wales, where all roading projects were reviewed for their impact on the climate emergency, with the bulk of planned roading projects cancelled on the basis that they increased emissions, increasing the burden on other sectors of the economy to reduce emissions to meet regional and national reduction targets.</p> <p>https://www.theguardian.com/environment/2023/feb/14/welsh-road-building-projects-stopped-failing-climate-review</p> <p>This Second Emissions Reduction Plan is heavily focused on EVs and not on other ways to reduce transport-related emissions. Supporting growth of EVs does not reduce our reliance on private vehicles. In cities, the emissions reduction opportunity is in compact urban form that enables transport needs to be more easily met with active and public transport. We recommend a significant increase in policy settings, investment and initiatives to incentivise the transition to moving more people with</p>

Section	Question	Answer
		<p>fewer vehicles, with co-benefits of reduced urban congestion, improved urban amenity, and reduced urban air pollution.</p> <p>In terms of planning and infrastructure, we agree with the Climate Change Commissions analysis in their monitoring report that “changes in early 2024 to policy direction for planning and infrastructure systems have created uncertainty around how climate change will be prioritised under the resource management reform”. It would be great to see clarity on how this will be addressed in the second emissions reduction plan. To achieve emissions reductions, planning and infrastructure settings need to support urban density, as this increases the ability for people living in urban centres to meet their transport needs with public and active transport.</p>
Chapter 7: Agriculture Te ahuwheua	7.1. What are the three main barriers or challenges to farmer uptake of emissions reduction technology?	This is not a significant consideration for the Council’s responsibilities.
	7.2. How can the Government better support farm- and/or industry-led action to reduce emissions?	This is not a significant consideration for the Council’s responsibilities.
	7.3. How should Government prioritise support for the development of different mitigation tools and technologies across different parts of the agriculture sector?	This is not a significant consideration for the Council’s responsibilities.
	7.4. What are three possible ways of encouraging farmer uptake of emissions-reduction tools?	This is not a significant consideration for the Council’s responsibilities.

Section	Question	Answer
	7.5. What are the key factors to consider when developing a fair and equitable pricing system?	This is not a significant consideration for the Council's responsibilities.
	7.6. Please provide any additional feedback on the Government's thinking about how to reduce emissions in the agriculture sector.	This is not a significant consideration for the Council's responsibilities.
Chapter 8: Forestry and wood processing Te ahumahi ngāherehere me te tukatuka rākau	8.1. How could partnerships be structured between the Government and the private sector to plant trees on Crown land (land owned and managed by the Government)?	<p>Partnerships between the Government and the private sector to plant trees on Crown land can be structured in the following ways:</p> <ul style="list-style-type: none"> - Public private partnerships (PPPs): where both parties share the costs, risks, and benefits of tree planting projects. - Lease Agreements: where the Government leases Crown land to private entities with the condition that they undertake restoration activities and share a portion of the earned carbon credits with the government. - Service Contracts: where private companies are contracted to manage tree planting and maintenance activities on Crown land. - Grant Programmes: where the Government provides grants to private entities to carry out tree planting initiatives. - Tax Incentives: where the government offer tax incentives to private companies that participate in tree planting projects, making the initiative more financially attractive. <p>Wellington City Council entered a partnership with Victoria University and leased an 11-hectare parcel of land for 33 years to the university, where native afforestation was primarily funded by the university, with the carbon credits shared equally between the two entities. The project purpose was both research and carbon sequestration. Roughly half of the 11-ha site has natural regeneration coming through gorse cover that will be left to establish by itself and the remaining half has now been fully planted with 12,500 eco-sourced native trees with the help of hundreds of university students, staff, and alumni as volunteer planters over the past 3 years.</p>

Section	Question	Answer
	8.2. What are the three main actions the Government could do to streamline consents for wood processing?	This is not a significant consideration for the Council's responsibilities.
	8.3. How large should the role of wood in the built environment play in New Zealand's climate response?	More than currently
	8.4. What other opportunities are there to reduce net emissions from the forestry and wood-processing sector?	This is not a significant consideration for the Council's responsibilities.
	8.5. Please provide any additional feedback on the Government's thinking about how to reduce emissions in the forestry and wood-processing sector.	In alignment with Wellington City's commitments to native afforestation and biodiversity, we would be very supportive of any complimentary policies that encourage a greater proportion of native afforestation.
Chapter 9: Non-forestry removals Ngā tangohanga ngāherehere-kore	9.1. What are the three main opportunities for non-forestry removals to support emissions reduction?	No comments
	9.2. What are three main barriers to developing more non-forestry removals?	No comments
	9.3. It is important to balance landowners ability	No comments

Section	Question	Answer
	to use their land flexibly with the recognition of the role of non-forestry removals. How can this balance be achieved?	
	9.4. What three main benefits beyond emissions reductions could be created by developing more non-forestry removals?	No comments
	9.5. What risks and trade-offs from incentivising land-use and management change to reduce net emissions need to be considered?	No comments
	9.6. Please provide any additional feedback on the Government's thinking about how to reduce emissions through non-forestry removals.	No comments
Chapter 10: Waste Te para	10.1. Do you agree or disagree that the Government should further investigate improvements to organic waste disposal and landfill gas capture?	Agree
	10.2. What is the main barrier to reducing emissions from waste (in	Diverting organics from landfill is still not standardised and normalised. The current barrier to this is strong legislative settings requiring organics waste diversion from landfill and improvement of landfill gas capture systems.

Section	Question	Answer
	<p>households and businesses or across the waste sector)?</p> <p>10.3. What is the main action the Government could take to support emissions reductions from waste (in households and businesses or across the waste sector)?</p> <p>10.4. Please provide any additional feedback on the Government’s thinking about how to reduce emissions in the waste sector.</p>	<p>In addition to stronger legislative settings, the govt could also invest in initiatives that shift consumption habits to focus on buying products that will last and can be repaired and are designed from materials that can be reused at end of life or reabsorbed into ecosystems. Product stewardship legislation and consumer education is required to enable better reliance on reuse and recovery products and services rather than virgin material production and use. The government has a role in supporting and funding circular economy initiatives that ensure recovery and reuse of materials and providing analysis and research into material flows in the economy, to allow for better informed and innovative design of products and services.</p> <p>Segregation, source separation and recycling are the most prominent ways to reduce waste emissions. Promoting and investing in collaboration between private and public service to divert construction and demolition waste in NZ. Understanding the relationship between materials and products we consume, how we consume and how we manage them through their lifecycle is key to understanding the impact of consumption emissions.</p>
<p>Chapter 11. Helping Sectors adapt to climate change impacts Te āwhina i ngā rāngai ki te</p>	<p>11.1. What are the three main barriers to managing climate risks through emissions reduction policies in this discussion document?</p>	<p>First barrier</p> <p><i>Siloed or non-comprehensive climate change policy responses</i> that fail to consider the scientific interdependencies between science-based emission reduction and the biophysical limitations of adaptation.</p> <p>Second barrier</p> <p><i>Insufficient emissions reduction policies</i> – adaptation and climate risk management outcomes are often operationalised locally, however rapid and urgent emissions reduction needs to be strongly regulated and funded nationally to prevent increased acceleration of climate instability.</p> <p>Third barrier</p>

Section	Question	Answer
		<p><i>Lack of accessible data and tools</i> to support evidence-based decision-making that is inclusive of both emissions and climate risk management create missed opportunities for efficient and effective climate change co-benefits of adaptation and emissions reduction to be achieved.</p>
	<p>11.2. What are the three main benefits of managing climate risks that can come from the emissions reductions policies in this discussion document?</p>	<p>First benefit Emissions reduction is the most powerful and upstream way to prevent climate change impacts and reduce the costs associated with adaptation. Without significant emissions reduction we will reach a level of climate instability where adaptation is no longer possible.</p> <p>Second benefit Reduced costs long-term – studies show that for each \$1 invested in climate change risk reduction and resilience there are significant savings in avoided costs in responding and recovering from disasters, health issues and the vast array of other climate-related risks and impacts that need to be managed.</p> <p>Third benefit Emissions reduction will reduce many complex and potentially disastrous negative impacts for communities and ecosystems.</p>
	<p>11.3. What are some examples of how businesses and industries are already managing climate risks?</p>	<p>Council is already undertaking several workstreams to embed climate change risk management into our operations from governance to operations, which is outlined in our climate change strategy Te Atakura. Our adaptation work programme includes activities relating to assessment of climate change impacts and risks locally, developing strategic climate change risk management, governance accountability and reporting processes and frameworks, as well as investing in climate resilience interventions (e.g. green/ blue/grey infrastructure).</p> <p>Some examples of activities Council has undertaken include:</p> <ul style="list-style-type: none"> - Updated new hazard maps and modelling to include new projections for sea level rise and flood risk modelling - Annual reporting to the CDP of climate risks and opportunities - District Plan approved new rules and provisions for climate resilience - Wellington Regional Climate Change Impact Report published

Section	Question	Answer
		<ul style="list-style-type: none"> - Developing a programme to focus on Community Climate Adaptation planning
	<p>11.4. How can these kinds of activities be further supported?</p>	<p>Greater urgency for the establishment of the <i>Climate Adaptation Act</i> that would clarify funding and the role of local government, as well as greater standardisation of guidance and practical tools and other support to Councils and communities to plan for climate change.</p> <p>There are significant opportunities to improve the efficiency, effectiveness and equity outcomes of climate risk management with that could be enabled through:</p> <ul style="list-style-type: none"> (a) Improved digital resources hub for climate risk management practitioners, infrastructure managers, iwi and others where common data and digital tools could better enable joined up decision-making for climate risk management across entities and boundaries (e.g. GIS tools, digital twins). This should include data and systems to support decision-making for better low-carbon and adaptive climate change interventions for cities and infrastructure planning (e.g. Digital Twins for the nation/ regions) that would better enable collaboration across agencies (e.g. regional sustainable transport planning). (b) Providing climate hazard data of the appropriate resolution for infrastructure decision-making via a central platform in line with the LG Guidelines for Climate Risk Assessments. (c) Resourcing to support the Aotearoa Climate Adaptation Network/ Aotearoa Society for Adaptation Professionals (ACAN/ASAP) and investing in training and capacity building for climate change professionals to focus on both mitigation and adaptation. (d) Climate Adaptation Act – developed in a timely manner with appropriate scope to support TAs, Regional Councils, iwi, utilities, other agencies and communities to work together towards local adaptation plans in efficient, proactive and coordinated ways with clarity on the funding arrangements for climate adaptation. (e) Adaptation Framework – to address the climate change risk management beyond coastal hazards (e.g. flooding) and incentivisation for climate change solutions that have co-benefits for emissions reduction and adaptation (e.g. nature-based solutions). This would better support regional coordination and efficiencies in processes for climate adaptation planning across TA boundaries.

Section	Question	Answer
	<p>11.5. Please provide any additional feedback on the pathway the Government has set out for managing climate risks from emissions reduction activities.</p>	<p>This is a confusing chapter in the discussion document, as it's unclear if the purpose is to ask for feedback on the government's approach to adaptation (which is a process already underway through a parliamentary inquiry), or to ask for feedback on the intersection of emissions reduction and climate adaptation.</p> <p>Overall, there is the potential that some emissions reduction policies and projects increase climate risk, and that some adaptation activities may increase emissions. Careful consideration of both mitigation and adaptation in the design of all govt policy across the key sectors is critical for ensuring a timely transition to a low-emissions resilient economy.</p> <p>We also note:</p> <ul style="list-style-type: none"> - Prevention of many climate change risks and impacts our region faces is possible if there is investment in rapid emissions reduction. - Emission reduction is the most effective way of preventing climate change risks and impacts. - Managing climate change risks has biophysical limitations, the highest value climate risk strategy is to mitigate emissions urgently and rapidly at scale. Without effective emissions reduction, adaptation will be extremely costly and unachievable. - As part of our climate change response, we have plans to support high-risk communities to adapt to climate change impacts – but are embarking upon the work without clarity on funding, boundaries on responsibilities, or policy/legal requirements needed now that the RMA reform was repealed. This poses significant operational risks.
<p>Chapter 12: Addressing distributional impacts of climate mitigation policy Te whakatutuki i ngā pāpānga tohatoha o te</p>	<p>12.1. What are the main impacts of reducing emissions on employees, employers, regions, iwi and Māori, and/or wider communities that you believe should be addressed through Government support?</p>	<ul style="list-style-type: none"> - Shifting from carbon-intensive industries to low or zero-carbon industries (e.g., fossil fuels to renewables) may lead to job losses in some sectors and job creation in others. So, the government should develop and fund training and offer upskilling programmes for employees transitioning to new roles. We also recommend revisiting the income insurance scheme. - Initial investments in green technologies may increase costs for employers. So, the government should provide grants, subsidies, or tax rebates for companies adopting green technologies and practices. - Higher fuel costs through the NZ ETS will raise the cost of living disproportionately on low-income households. The govt should focus on investing in alternatives, for example

Section	Question	Answer
kaupapahere whakamauru panoni āhuarangi		<p>significantly increasing investment in urban walking, cycling and public transport infrastructure, and support for low-income households to purchase electric vehicles. Seeking to address this cost-of-living impact through general tax relief reduces the effectiveness of the NZ ETS as a price signal. It would be more effective to ringfence the revenue generated from the NZ ETS and utilise it on initiatives that support alternative low carbon solutions.</p> <ul style="list-style-type: none"> - The government needs to foster partnerships with iwi and Māori organizations to ensure that their perspectives and aspirations are included in climate initiatives. In addition, the government should ensure that new opportunities in low or zero-carbon industries benefit Māori communities. - The government should support community-led sustainability projects and initiatives to ensure that they benefit wider communities. - The government also needs to assess emissions reductions policies and initiatives for their impact on disability and accessibility communities. For example, in transitioning to a low or zero-carbon transport system in cities, priority needs to be given to ensuring that the transport needs of disabled communities can be met, with careful design of infrastructure and policies, and targeted support as required.
	<p>12.2. Do you think additional climate-specific services, supports or programmes should be considered by the Government over the coming years?</p> <p>Yes/No/Unsure</p> <p>The Government can use a lot of existing tools to support people affected by reducing emissions (welfare and income support</p>	<p>Yes</p> <p>The following climate-specific services, supports or programmes would be useful:</p> <ul style="list-style-type: none"> - An income insurance scheme to support employees to transition from high to low-emissions intensive industries. - Grants, subsidies, or tax rebates for companies adopting green technologies and practices. - Significantly increased investment in urban walking, cycling and public transport infrastructure, and support for low-income households to purchase electric vehicles, to enable the price signal of the NZ ETS through the cost of fuel to be effective for those residents without existing alternative options. - Funding for a Climate Action Hub to provide information on effective emissions reduction to individuals, communities and organisations. - Fostering partnerships with iwi and Māori organizations to ensure that their perspectives and aspirations are included in climate initiatives. - Support for community-led sustainability projects and initiatives to ensure that they benefit wider communities.

Section	Question	Answer
	<p>systems, employment and training services).</p> <p>Please describe what additional climate-specific services, supports or programmes could be useful.</p>	<ul style="list-style-type: none"> - Integration of climate considerations into transport, planning and infrastructure policy settings - Lowering the cap on total emissions to create scarcity in the market. This would increase the price of emission units and encourage companies to invest in cleaner technologies.
Privacy statement and consent to release submissions	1. Have you read and understood our privacy statement on who will see your information and how it will be used?	Yes, I have read and understood the statement.
	2. Do you consent to your submission being published on this website?	Yes
	3. If yes to the above, clearly state if there are parts of your submission that you do not want published.	Not applicable
	4. Do you consent to your details being kept as part of a stakeholder list for future communication about ERP2 or related climate issues?	Yes