

12 February 2021

To He Pou a Rangi Climate Change Commission,

Ngā mihi nui ki a koutou kātoa.

Te Taitokerau Northland Councils are pleased to submit on the Climate Change Commission's draft advice package. This is a joint submission from Northland Regional Council, Far North District Council, Kaipara District Council and Whangārei District Council (Northland Councils).

As Northland Councils, we recognise and affirm that urgent action is required at all levels of government to respond to the climate change crisis and reduce the risk of further harm by reducing emissions. Urgent action to reduce emissions is critical to Aotearoa New Zealand's contribution towards the long-term goals of the Paris Agreement, and to reach a global peak in emissions as soon as possible and a decline thereafter. We support that this will be achieved in accordance with the best available science, and that uncertainty is not a reason to delay.

While emissions reduction is largely led by central government, Northland Councils recognise that local government has an important responsibility to work together with central government towards our national emission reduction targets and to support resilience in our communities in the low emissions transition.

We recognise that Northland Councils can lead by example to achieve a low emissions transition by:

- aligning with national emissions targets,
- establishing measurement and reporting processes,
- implementing actions.

We recognise our role in leading, supporting and coordinating Te Taitokerau Northland's transition to a low emissions society through regulatory and non-regulatory functions. We also recognise the unique relationships Northland councils have with local communities, businesses, tangata whenua and iwi and hapū partners. These relationships will be essential in our transition.

Northland Councils are already working together on a collaborative approach to adaptation. We view this submission as an opportunity to inform national mitigation direction and a national low emissions transition. Outside of this submission, each council is separately establishing its own organisational emissions measurements and reporting processes.

Northland Councils also see this submission as an opportunity to provide feedback on whether the emissions budgets and emissions reduction plan will support the needs of Te Taitokerau Northland and enable a just transition for our communities.

Here are some considerations Northland Councils would like He Pou a Rangi Climate Change Commission to consider.

- We are a predominantly rural region.
- We have a high proportion of Māori, roughly 40% of Te Taitokerau Northland's population is of Māori descent, with nine iwi, 250+ hapū, and relatively few settlements with the Crown.
- Areas of the region are experiencing rapid growth and development, especially those areas connected by the state highway to Tāmaki Makaurau Auckland.
- Our local economies are predominantly manufacturing and primary industries which are sensitive to carbon pricing and any future biogenic methane pricing.
 - Throughout most of the region we have a primary production economy in a low-productivity natural environment,
 - We have high contributing industries that will need a lot of support to transition, for instance the cement works and refinery.
- Our region has large gaps in income and average wage, access to health services and access to infrastructure services. Māori are disproportionately represented in deprivation statistics.
- Our communities' mobility and connectivity are heavily road and vehicle dependent. We have limited public transport and low patronage and limited electric vehicle infrastructure; however, with high levels of EV vehicle ownership for our population
- Land use in the region presents opportunities for removals and offsetting.
- Our climate and land value present opportunities for developing renewables infrastructure.

Northland Councils reinforce He Pou a Rangi Climate Change Commission's objective of a just, equitable transition. For Te Taitokerau Northland, equity is critical to the success of emissions budgets, the emissions reduction plan and long-lasting climate action.

Te Taitokerau Northland Councils offer their local government input to aid in understanding the region's unique context and to use the Region's strengths to achieve a low emission, equitable future. We also offer to provide further feedback and to regularly contribute throughout He Pou a Rangi Climate Change Commission processes.

Kia ora rawa atu.

Nā mātou noa, nā

SIGNATURES AND LOGOS TO GO HERE

Submission explanation

Please note, three additional document management edits will be made prior to submitting:

- We will remove colour coding. This is for councils' reference only.
- We will remove blank subsections where specific councils have not added any subpoint.
- These document management points will be removed and only acronyms and or necessary consultation explanations will remain.

Colour coding:

Staff have graded the questions according to relevance to councils and/or Te Taitokerau Northland context.

Low relevance or significance, or accept recommendations as read.	Some relevance, significance, or recommended change.	High relevance, significance, or area of concern.

Acronyms

FNDC = Far North District Council

KDC = Kaipara District Council

WDC = Whangārei District Council

NRC = Northland Regional Council

LG = Local government

Consultation question responses

Question 1	Principles to guide our advice Do you support the principles we have used to guide our analysis? Is there anything we should change, and why?
All Councils	We are supportive of the principles. In addition, we make the following comments: Principle 3: Te Ao Māori and Mātauranga Māori must inform the development of options as this will bring in a lens that considers consequential actions and balance. Principle 4: In terms of cost, it should be acknowledged that we are not currently experiencing the true cost of using resources; it is future generations who will bear the heaviest burden of environmental degradation.
FNDC	
KDC	
WDC	
NRC	<ul style="list-style-type: none"> Should there be an explicit reference to working with Māori and the He Ara Waiora framework here?

Question 2	Emissions Budget Levels Do you support budget recommendation 1? Is there anything we should change, and why?
All Councils	Supportive.
FNDC	
KDC	
WDC	
NRC	<ul style="list-style-type: none"> Are the yearly budgets aspirational enough in the short term? Do they reflect the urgency of the climate crisis and transformative change required?

Question 3	Breakdown of emissions budget Do you support our proposed breakdown of emissions budgets between gross long-lived gases, biogenic methane and carbon removals from forestry? Is there anything we should change, and why?
All Councils	Generally supportive. We also recommend: <ul style="list-style-type: none"> Change the term 'forestry' to 'biological carbon removal' Consider other carbon sinks e.g. wetlands, mangroves, peatlands, seagrasses. Develop mechanisms that encourage and reward carbon sinks that achieve multiple outcomes in addition to sequestration such as growing the soil sponge, supporting the growth of species for rongoa, providing habitat for taonga species. This is discussed further in the response to Consultation Question 10 & 11.
FNDC	
KDC	

WDC	
NRC	<ul style="list-style-type: none"> • Is it appropriate to include domestic electricity generation within the same category as heavy industry? • Should biogenic methane emissions be reported in terms of CO2-e to align with other emissions?

Question 4	Limit on offshore mitigation for emissions budgets and circumstances justifying its use Do you support budget recommendation 4? Is there anything we should change, and why?
All Councils	Supportive, no comments.
FNDC	
KDC	
WDC	
NRC	

Question 5	Cross-party support for emissions budget Do you support enabling recommendation 1? Is there anything we should change, and why?
All Councils	Supportive, no comments.
FNDC	
KDC	
WDC	
NRC	

Question 6	Coordinate efforts to address climate change across Government Do you support enabling recommendation 2? Is there anything we should change, and why?
All Councils	Supportive.
FNDC	
KDC	<p>KDC supports this recommendation and offers specific ideas on the ways to coordinate:</p> <ul style="list-style-type: none"> • Health & Planning: urban heat reduction principles, green space & amenity planting • Education: resilience and self-sufficiency: Zero waste education institutions. Zero emissions schools. • Justice: rehabilitation & community service schemes focused on afforestation and amenity planting, community gardens • Social Development: training incentives for carbon zero projects and vocational opportunities • Environment: Increase budget to enable more funding into the regions • Tourism: introduce a levy on foreign tourists to be applied to carbon zero outcomes
WDC	WDC supports and would like to emphasise that, if implemented, the recommendation also sets up the internal 'infrastructure', ownership and necessary budgeting required for delivery. From our internal experience delivery is challenging if an 'across-organisation' approach is not in place.

NRC	<ul style="list-style-type: none"> Should there be more explicit emphasis on transforming existing work programs across government to achieve zero-carbon objectives? For example, revisiting MPI goals of increasing agricultural production, public housing program, NZTA roading investments. Should there be more emphasis on updating all government policy and legislation to embed zero-carbon objectives?
-----	---

Question 7	Genuine, active and enduring partnership with iwi/Māori Do you support enabling recommendation 3? Is there anything we should change, and why?
All Councils	<p>We are very supportive of this recommendation. This is a very relevant requirement for Te Taitokerau Northland. Northland Councils are working with hapū/iwi to bring Te Ao Māori and Tikanga Māori into our adaptation and mitigation activities. This work is resource intensive for both partners. Therefore, we seek the inclusion within Recommendation 3 that funding and resourcing is made available to both LG and hapū /iwi for engagement, planning, decision making and implementation. We would also like to see a recommendation on development of guidance or best practice examples in terms of LG and iwi/hapu partnership processes in climate change response.</p> <p>We note that the sole focus on forestry as a carbon sink addressed in Consultation Questions 3 and 11, could conflict with the intention to enable kaitiakitanga and acknowledge rangatiratanga.</p>
FNDC	
KDC	
WDC	
NRC	<ul style="list-style-type: none"> Does the recommendation uphold our Treaty obligations? Does it allow for a true partnership with Māori during the development and implementation of the zero-carbon transition? Should the progress indicator be more ambitious? E.g. Require evidence of actual engagement during the process of developing the emissions reduction plan ERP, rather than merely a plan for how they will partner during its implementation?

Question 8	Central and local government working in partnership Do you support enabling recommendation 4? Is there anything we should change, and why?
All Councils	<p>We support the recommendation and the progress indicators. We would like the progress indicator on partnership to clarify who is responsible for tracking any work plan at a regional level and at a national level. We would also like to see the progress indicators ensure clarity on how alignment will be implemented and assessed at a consent and monitoring level.</p> <p>We also have concerns regarding limited staff capacity, training requirements, and ease of access and process for funding applications and we would like the government work plan to consider these issues.</p>
FNDC	
KDC	
WDC	WDC generally supports this recommendation.

	<p>In response to Point A, we recommend that a National Policy Statement and National Environmental Standards are developed to support implementation by LG consent departments.</p> <p>In response to Point B, we advocate for funding mechanisms and funding to be made available urgently for LG. This includes funding models that LG could administer to support action by the community for initiatives such as green infrastructure. Funding mechanisms available to support Councils to reduce their own emissions should be enduring and sustainable. Funding will enable Councils to lower their emissions quicker than what the LTP cycle enables. For example, WDC have the assets and resources available to construct and operate infrastructure diverting organic waste from landfill. We do not have the funding available to operate the collection process.</p>
NRC	<ul style="list-style-type: none"> • Does the recommendation recognise regional differences in terms of transition challenges and local government capacity? • Many of the recommendations to achieve emissions reduction in the report rely on local government to drive behaviour change and private emissions reductions (e.g. transport, waste, land-use, urban form etc). <ul style="list-style-type: none"> o Is there clarity as to the role of local government in the zero-carbon transition, and identification of risks (e.g. financial, capacity, supporting legislation etc)? o Are the recommendations sufficient to enable local government to achieve these aims (many of which have been aspirational targets for years, but unachievable given current governance arrangements)? • RMA consenting processes will soon be able to consider GHG emissions. If the RMA is to be used as a mechanism to control emissions, transparent tracking of emissions, especially for large industrial emitters is essential to enable the achievement of national emissions budgets. Northland has a number of large emitters including the Portland cement works and Refining NZ. <ul style="list-style-type: none"> o Does the recommendation support regional councils to implement the RMA? o Should there be more support through a responsible agency and clear policy direction on mechanisms to enable GHG emissions to be included in consent conditions? • Are the progress indicators sufficient? <ul style="list-style-type: none"> o Should there be a requirement to show evidence of improved partnerships with local government? o Should there be an indicator to show evidence that legislation and policy has been reviewed and updated to enable the required actions by local government? o Should there be an indicator to show evidence that a funding mechanism has been put into place, rather than just a work program?

Question 9	Establish processes for incorporating the views of all New Zealanders Do you support enabling recommendation 4? Is there anything we should change, and why?
All Councils	<p>We are very supportive of this recommendation. We would like the recommendation to include ways to enable LG to also enact this, i.e. creation of an information hub or database with localised examples of inclusive engagement in action, especially youth.</p> <p>We would like the recommendation to consider the connection between adaptation and mitigation. Many councils are working to develop more inclusive practices for adaptation. We are interested to see how these could transfer to mitigation.</p>
FNDC	
KDC	
WDC	
NRC	<ul style="list-style-type: none"> • The UK experience of citizen's climate assembly was that many of the recommendations were not implemented leading to lack of trust in the process. <ul style="list-style-type: none"> ○ Does the recommendation sufficiently address how to ensure sincerity in the process?

Question 10-11	<p>Locking in net zero</p> <p>Do you support our approach to focus on decarbonising sources of long-lived gas emissions where possible? Is there anything we should change? Do you support our approach to focus on growing new native forests to create a long-lived source of carbon removals? Is there anything we should change, and why?</p>
All Councils	<p>We are supportive of increasing the focus on native forests and balance with plantation forestry. We appreciate the degree of awareness regarding community impacts and land-use and biodiversity issues that can come with plantation forestry.</p> <p>We would like to see Te Ao Māori and Māori values guiding this approach.</p>
FNDC	
KDC	<p>KDC would like to emphasise their support of the approach afforestation with non-exotic species to offset emissions and sees this as an approach with many localco-benefits. For example, the Northland Totara Working Party has been working on a pilot for totara as a plantation forest. The direction of this group is to search out a more lucrative and environmentally improved form of forestry. They have identified totara as highly potential. There is also valuable work for using the continuous cover forestry model, which could work very well for this District/Region.</p> <p>KDC would like recommendations that provide more direction on how an afforestation approach could be linked to large-scale environmental projects already underway, for example multi-party projects like the Kaipara Remediation Programme.</p>
WDC	<p>WDC also recommends:</p> <ul style="list-style-type: none"> • considering other carbon sinks, i.e. wetlands, mangroves, peatlands, seagrasses. • developing mechanisms that encourage and reward carbon sinks that achieve multiple outcomes in addition to sequestration such as supporting the growth of species for rongoa, providing habitat for taonga species. <p>WDC makes the above recommendation with the understanding that it would align more closely with the expectations of the hapū/iwi in Taitokerau than a sole focus on forestry and that it offers more development opportunities for the use of assets returned through Treaty Settlements. WDC also note that a sole focus on forestry as a carbon sink may conflict with the intention of Enabling Recommendation 3 regarding kaitiakitanga.</p>
NRC	<ul style="list-style-type: none"> • Does the focus on reducing long-lived gases vs short-lived gases including methane (i.e. agricultural sector) provide clear enough direction to drive change in land use? • Does the focus on new native forests vs exotic plantations align with NRC's objectives for kaitiakitanga of the land? • Are there supporting policies to enable the conversion of low-productivity farmland to native forests? • Are incentives sufficient to drive afforestation? Is the ETS sufficient? Will a farm-based carbon pricing mechanism support land-use change? • Should other carbon sinks such as peatland, wetlands, riparian strips, mangroves, saltmarsh, seagrass and marine blue carbon also be included as biological carbon removals?

Question 12	Our path to meeting the budgets Do you support the overall path that we have proposed to meet the first three budgets? Is there anything we should change, and why?
All Councils	<p>We found this formatting somewhat confusing. We read section 3.5 as a combination of high-level methodology addressing the overall approach and more specific recommendations on actions. We were uncertain how to target our responses and how much detail to provide.</p> <p>We have one general comment regarding how the information is presented and how this could influence policy response. The pathway approach groups domestic electricity with industry and heat. These components involve very different end users/user grouping. We would recommend that any recommendations need to emphasise this difference and account for that in any recommendations on policy.</p> <p>Te Taitokerau will be heavily impacted by key transitions and timing for transport and heat, industry and power. We support the focus and timelines but as of now, do not have the infrastructure, strategies or regulatory tool kits ready to reach the recommended key transitions. We emphasise the need to have equitable, resourced and well-aligned transition plans in place. We discuss this in more detail in Questions 13-18.</p>
FNDC	
KDC	
WDC	<p>WDC reiterates the urgent need for funding and funding models to be in place to enable LG to respond as appropriate for a climate crisis particularly where these are for new builds. For example, we have the resourcing available to establish the infrastructure to use diverted organic waste from landfill but we do not have the resources to operate the on-going collection process.</p>
NRC	<ul style="list-style-type: none"> • Is the overall balance right? • Should domestic electricity be included in the same grouping as industry, as it requires different policy responses? • Heavy industry is assumed to continue using gas and coal in the first 3 carbon budgets. <ul style="list-style-type: none"> ○ Should there be more focus on providing incentives and support for these industries to transition (especially considering the existing industrial allocations of NZUs in the ETS)?

Question 13	An equitable, inclusive and well-planned climate transition Do you support the package of recommendations and actions we have proposed to increase the likelihood of an equitable, inclusive and well-planned climate transition? Is there anything we should change, and why?
All Councils	<p>This is very relevant for Taitokerau's communities and our agricultural, industry and forestry economies. We have communities that will be particularly affected by climate change: rural, remote, limited access to services, road and driving dependent, coastal/low-lying, high proportion of Māori communities.</p> <p>We are supportive of training to grow a Taitokerau workforce to enable continued employment and mitigate job loss. We are interested in funding models for LG to support this transition, as well as funding models direct to community organisations and iwi and hapū.</p> <p>We would like recommendations to include adaptation more strongly here. Northland Councils are starting on dynamic adaptive pathways decision-making and any localised adaptation decisions and strategies will impact this transition.</p>
FNDC	
KDC	<p>KDC is very supportive of recommendations to promote native forestry to prevent against over-reliance on plantation forestry and to mitigate job loss. We are very supportive of any recommendations to extend grant schemes such as One Billion Trees or to create ecosystem services payments. We would like more information on how this could be enabled and aligned and encourage the proposed Equitable Transition Strategy to address this.</p>
WDC	
NRC	<ul style="list-style-type: none"> • Is this recommendation consistent with the overall direction of the guidance? • Do the recommendations sufficiently address potential disproportionate impacts on Te Taitokerau? (particularly rural, Māori and underprivileged) • Does it sufficiently address the potential social, economic and environmental impacts and opportunities of a zero-carbon transition? • Are future generations sufficiently considered when addressing equity, and how is this realised in planning and decision-making?

Question 14	Transport Do you support the package of recommendations and actions for the transport sector? Is there anything we should change, and why?
All Councils	<p>We would like the recommendations to include more detail on how these actions could work. Many are not new initiatives, so how do we give these greater teeth? We would also like analysis on the implementability of these transport actions. Analysis and guidance on what we could do differently to learn from past attempts would enable faster and more effective uptake of transport mode change.</p> <p>This recommendation is very relevant for Taitokerau. We are a dispersed, rural region with many unsealed roads. The charging network is inadequate, particularly in the West Coast of the region. Our communities' mobility and</p>

	<p>connectivity is heavily road and vehicle dependent. We have limited public transport and low patronage and limited electric vehicle infrastructure; however, with high levels of EV vehicle ownership for our population.</p> <p>Currently, the majority of EVs at the affordable range are inadequate for use on the unsealed roads. Therefore, a quick uptake of EVs with greater off-road capability would help. There are also partnership opportunities with other agencies and organisations to enable greater provision of EV charging infrastructure across the region, for example marae.</p> <p>We would like the Equitable Transition Strategy proposed in Time-critical necessary action 1, progress indicator, to address how EV uptake and transport mode shift could be incentivised for our low-income and/or rural communities to ensure that those more vulnerable are not penalised.</p> <p>Necessary Action 2 – Considering LG’s role, planning and transport are highly interlinked. Land use planning is a major component and is a long-term process. Given that mode use change is a big focus in approach and that LTPs are being drafted now, how do we ensure the funding available to LG is enduring so can be included in LTPs? We also recommend that the charging infrastructure plan include clear direction on how it will be synced across government.</p> <p>We appreciate the co-benefits of Necessary Action 4 in terms of increased safety for cyclists, pedestrians and drivers.</p>
FNDC	
KDC	<p>Feasibility and design phases for smaller councils is resource intensive because it usually requires external professional services. This is a major barrier to projects that enable transport mode shift. KDC emphasises the need for a recommendation to increase resources and funding streams to jump start these processes.</p>
WDC	<p>Supportive of the alignment shown between the recommendations and other already existing policy including the NPS-UD and the GPS.</p> <p>WDC recommends:</p> <ul style="list-style-type: none"> • Better alignment between the future transport direction and local government funding. • More research into either already existing or new incentives that will help those vulnerable communities to having access to EV’s. • Acknowledging with the new transport recommendations, there are specific needs that should be addressed for those living with a disability, particularly around accessibility and the affordability of alternative transport services.
NRC	<ul style="list-style-type: none"> • Given the existing challenges of changing travel behaviour to alternative modes, do the recommendations sufficiently support the assumptions depicted in emissions reductions due to reduced travel demand and mode shift? • Is additional support required to drive short-term behaviour change, given the need for changes to urban form to support alternative transport? • Given our rural population, are the assumptions around reduced travel and EV uptake realistic to be included in the emissions model? Are there other incentives or drivers required to achieve these outcomes?

- Staff support the recommendations on transport in general, and in particular the additional support that will be required for more remote communities such as those in Te Taitokerau to ensure that they are not disadvantaged, and also noting that it is important that overall private car ownership must decline over time, so policies should not result in increased numbers of vehicles (i.e. it is truly a fleet replacement strategy and scrappage of ICE needs to be factored in).
- Fully support the need to better provide for and enable walking and cycling and modal shift for freight from road to rail and coastal shipping.
- Staff also note that as there is no consideration of recreational boats and emissions from outboard motors (particularly carburettored 2-strokes see for e.g. <https://www.maritimenz.govt.nz/recreational/the-basics/documents/Two-stroke-VS-four-stroke.pdf>) and this is a key “missing” sector and if not properly accounted for will mean that the policies adopted will target cars and not address the large number of recreational vessels that are used on a daily basis (annual emissions from the 4 boats owned by NRC are similar in scale to those of the NRC fleet). Many countries have already banned older 2-stroke outboards due to their emissions, and electric motors (inboard and outboard) are already commercially available in NZ – and a similar policy approach to EVs for land can be taken for transitioning the recreational fleet from petrol outboards with mandatory emissions rating systems (such as that used in Australia) would assist consumers in making informed purchase choices. 2020 research found that 45% of kiwis participated in recreational boating in the past 12 months (1.67 million people) with kiwis owning an estimated 560,00+ small craft powered by motor <https://www.maritimenz.govt.nz/recreational/safety-campaigns/documents/Recreational-boating-survey-2020.pdf>. Emissions testing done by the US EPA found that one hour of operation of an outboard powered motor boat (with a relatively clean engine that met the 2006 EPA regulations) produced the same pollution as about 50 cars operated at a similar ground speed. However, they also found that older style outboard engines that did not comply with US EPA 2006 limits were likely to emit around 10 times the amount of pollution compared to conforming outboard engines – that's the equivalent of 500 cars - so assuming worst case scenario of all the estimated outboards in NZ being powered by older model 2-strokes – emissions of outboards from recreational craft would equate to that of 280 million cars. This is a sector that is completely missing from the Advice and needs to be rectified – and, at a minimum, the Advice should note that there is no data on outboard ownership available and that maritime recreational emissions have therefore been included as “land transport” emissions. Mandatory registration of all watercraft is an essential starting point to enable more accurate data to be gathered.
- In regards to Necessary Action 4 (low carbon fuels for trains, ships, heavy trucks and planes): There are numerous options to reduce emissions from the existing vessels without any technology change or switch to alternative fuels (significant emissions reductions can be achieved from operational changes such as reducing speed, propeller pitch, engine tuning, just-in-time arrivals, hull coatings etc) and these should be implemented immediately. Wind propulsion is also an obvious solution for shipping (it was not that long ago when all freight and most passengers were transported by wind-powered ships) and is available today and can be

	<p>incorporated into retrofit (e.g. flettner rotors and sails) as well as new builds. There is huge potential for reinvigorating the boat building industry with a focus on zero carbon vessels in Te Taitokerau for not only NZ but also our Pacific neighbours (many of whom already have strategies in place to shift to zero carbon vessels) which requires collaboration between the private sector, government and researchers if this opportunity is to be maximised and lots of the skillsets are already available in the workforce (e.g. from the yachting industry).</p> <ul style="list-style-type: none">• We fully support the modal shift of freight to coastal shipping but note that this will require significant investment in wharves and jetties in secondary and minor ports/harbours if the full potential for this modal shift is to be realised. Ports themselves are critical in supporting the decarbonisation of the maritime transport sector (including visiting international ships) with provision of infrastructure for cold ironing as well as other mechanisms such as reduced port fees for greener ships. NZ should also follow closely the innovations happening globally on alternative low carbon fuels, with ammonia, methanol, green hydrogen (and wind power) being the front runners currently for international shipping.• The recommended actions should include a National Action Plan for domestic maritime emissions reduction to be lodged with the International Maritime Organisation by 31 December 2022
--	--

Question 15	Heat, industry and power sectors Do you support the package of recommendations and actions for the heat, industry and power sectors? Is there anything we should change, and why?
All Councils	<p>Necessary Action 5, Point D, is especially relevant for Te Taitokerau context. Many areas in our region already experience unreliable electricity network and there are concerns over network capacity. We emphasise that an assessment of Te Taitokerau's (and each region's) capacity and potential would be an important first step towards a national energy strategy. We would like more information about how Necessary Actions 9 & 10 would be enabled, especially how they would be aligned with council planning processes like District Plans and Regional Plans, including timeframes for inclusion.</p> <p>We support Necessary Action 5 and particularly appreciate Points D, E, and F. We reinforce the recommendation to enable community-based energy generation. Many of our communities experience higher costs for electricity compared to other parts of Aotearoa and we have communities and families living with energy poverty. At the same time, there are opportunities in Te Taitokerau to house infrastructure for renewables generation and increased expansion in electricity system. We believe these actions would support a more equitable transition, increase wellbeing, and enable long-term, transformative change.</p>
FNDC	
KDC	
WDC	
NRC	<ul style="list-style-type: none"> • Does the recommendation sufficiently address the issue of energy poverty in Northland? Does it sufficiently drive renewable energy production locally? • Should embodied energy in new buildings be addressed alongside energy efficiency, in particular the use of high-carbon footprint materials such as steel and concrete? Is there an opportunity to align investment in new low-carbon building material production (e.g. engineered wood products) to reduce consumption of carbon-intensive products? • Heavy industry, a hard-to-abate sector that includes petroleum and cement production, is not targeted for transformative change in this advice. In addition, NZU industry allocations mean that market mechanisms will not be forcing emissions-efficiency for heavy industry. <ul style="list-style-type: none"> o Are the recommendations appropriate to enable long-term transformation of these important local industries?

Question 16	Agriculture Do you support the package of recommendations and actions for the agriculture sector? Is there anything we should change, and why?
All Councils	<p>We are supportive of a pricing mechanism for agriculture emissions but would stress the need for farmers to be provided enough support, training, and sufficient time to transition.</p> <p>We are interested in how the mechanism could account for smaller scale sequestration in a manner that the ETS currently does not. We question the assumption that increased efficiency can drive reduction in herd numbers.</p> <p>We would like to see the recommendation on research funding also include research on international and domestic market options – e.g. further secondary processing creating high value product to reduce high throughput requirements characteristic of current agriculture, particularly dairy. The dominant approach requires high throughput of resources as opposed to quality.</p> <p>We would also like to see a recommendation to address actions to increase awareness with farmers about other opportunities (understanding that a review of E Waka Eke Noa is forthcoming and that this could be included in this review).</p>
FNDC	
KDC	
WDC	<p>WDC has a growing responsibility to advocate for the needs for our rural communities.</p> <p>WDC recommend:</p> <ul style="list-style-type: none"> • New support packages to assist the agricultural sector to properly engage in the ETS. • Opportunity for local authorities to be engaged in the He Waka Eke Noa work programme. WDC will have a role assisting our rural communities reduce their emissions profile.
NRC	<ul style="list-style-type: none"> • The commission's advice largely assumes continuity of existing land-uses while achieving emissions reductions. <ul style="list-style-type: none"> o Are the assumptions regarding ongoing increases in efficiency (e.g. milk protein/meat per animal) leading to herd size reductions realistic, especially in Northland's rural sector? o Should more focus be placed on a transition away from emissions-intensive agriculture toward sustainable production and high-value or niche products (e.g. eel/tuna; industrial hemp; horticulture)? What enablers are required for Northland? o International markets are assumed to continue. Should the potential impacts of an international carbon price on shipping be considered? • NRC already works closely with farmers and has an opportunity to help reduce on-farm emissions. There is also a synergy between climate adaptation in farm management and emissions reduction. A whole-of-farm approach will be more useful than a siloed approach and establishing a framework for on-farm sequestration may be useful (e.g. through small scale afforestation and peatland re-wetting).

	<ul style="list-style-type: none"> o Do the recommendations sufficiently align with our approach to land management? • Anecdotal evidence in our region indicates that increased regulation of wetlands (via the updated NPS for freshwater management) has created perverse outcomes including the destruction of some habitat. Enabling relevant on-farm habitat to be counted as biological carbon sinks, and bringing this into either the farm-based carbon pricing mechanism or the ETS would enable farmers to remove carbon and offset emissions while they work to reduce methane and fossil fuel emissions. There are also many co-benefits to this approach including ecological services and biodiversity. <ul style="list-style-type: none"> o Does the recommendation sufficiently support farmers to remove carbon on-farm?
--	--

Question 17	Forestry
	Do you support the package of recommendations and actions for the forestry sector? Is there anything we should change, and why?
All Councils	<p>We suggest widening the scope of sinks and removal opportunities to Biological Carbon Removals. We are interested in why carbon sinks have not been recommended to include wetlands, peatlands, coastal blue carbon, pasture, hemp, riparian planting and smaller levels of planting. We are supportive of an audit of carbon removal options, like large scale forestry and other options like wetland. This would align with requirement to map wetlands under NZ NPS-FWM.</p> <p>We would be interested to see recommendations around how mitigation and carbon sequestration opportunities could be built into adaptation strategies, especially looking at regional spatial mapping of these opportunities. We would like to see a recommendation to develop robust accounting processes for non-forestry biological removals.</p>
KDC	
FNDC	
WDC	
NRC	<ul style="list-style-type: none"> • The commission focusses on large scale forestry (>50ha) to achieve carbon removals. <ul style="list-style-type: none"> o Does this align with existing approaches and opportunities for afforestation in Northland? o Does it sufficiently consider the impacts on Māori of using crown land for permanent forests where this land is potentially the subject of treaty negotiations? o Does the recommendation align with whole-of-catchment approaches that have the potential to reduce flood risk and sedimentation? o Does the recommendation address in enough detail the need to consider biodiversity outcomes and climatic shifts over time, given the projected shifts and composition changes in ecological communities under climate change scenarios?

	<ul style="list-style-type: none">• Northland presents particular needs and opportunities for carbon removals both through afforestation and other biological removals, including coastal blue carbon. Given the projected landward expansion of mangrove, saltmarsh and seagrass habitats in Northland, and the existence of council-owned coastal stopbanks (e.g. Awanui) there is a great potential for carbon sequestration to be pursued as part of a coastal adaptation strategy. Other opportunities are likely to become evident with further investigation.<ul style="list-style-type: none">o Do the recommendations enable regionally relevant and targeted carbon removals projects?o Is enough consideration given to the opportunity of alignment with and financial relationship to, climate adaptation and other environmental management projects?o Are the recommendations strong enough regarding enabling alternative biological carbon removal projects?
--	---

Question 18	Waste Do you support the package of recommendations and actions for the waste sector? Is there anything we should change, and why?
All Councils	<p>We would like the recommendations to address how LG can be better enabled to develop infrastructure to support waste diversion, use of biofuels and minimisation of waste. We would also like to see a recommendation for an audit of approaches that have been successful / unsuccessful in the past. Additionally, we would like to know, what can we learn from international approaches and how can we trial those suitable to NZ.</p> <p>We would also like greater detail on how the approach considers equity. We have concerns that levies or any approaches that pass costs on to end-users may most significantly impact low-income families and/or rural, isolated families who do not have easy access to waste diversion services. We support the approach to “shift the burden of resource recovery away from communities and nature to manufacturers” outlined in Evidence Chapter 17 and would like to see this reflected more strongly in Necessary Action 13.</p> <p>We would like the approach more fully address farm waste as well as municipal waste and see recommendations regarding farm waste reduction and diversion.</p> <p>We also have concerns that industrial waste and construction waste are not present in this approach. The recommendation does not seem to consider embodied carbon in buildings and building construction waste. We would like to see the building sector better accounted for, beyond energy efficiency.</p>
KDC	<p>KDC is supportive of the two-pronged approach of reducing waste and increasing resource recovery. KDC is a small council with limited capacity to expand infrastructure to directly provide resource recovery services. The ‘best-practice’ examples are usually beyond our feasibility. Instead, we indirectly support community groups to reduce and divert waste, i.e. our support of Sustainable Kaipara. We recommend that any coordinated national strategy to reduce waste involves engagement with small councils, as well as community groups. Enabling localised reduction and diversion has co-benefits, including long term behaviour change, enhancing local capacity and expertise, and potential job creation and income streams.</p>
FNDC	
WDC	<p>WDC is supportive of the waste reduction approach and of the circular economy target.</p> <p>WDC recommend:</p> <ul style="list-style-type: none"> • Recognition the landfill levy is currently the main tool to influence people’s behaviours to waste disposal. • Inclusion for how the knowledges and expertise of Tangata Whenua can help guide the shift to the circular economy. • Concerns that punitive approaches will have heavy impacts on low-income communities. Explore other options to influence communities’ behaviours to waste disposal that are equitable to all groups.
NRC	<ul style="list-style-type: none"> • While the report acknowledges the importance of reducing waste, it does not address the issue of production and sale of high-waste items, in particular items that prevent easy avoidance of landfill through recycling or

	<p>composting. Given that methane production in landfills is largely due to the presence of putrescible/compostable matter, the report does not target those industries producing large amounts of this. It also does not suggest that the government make stricter provisions to direct councils to divert compostable matter from landfills. Without stricter legislation, councils will struggle to voluntarily implement compostable waste reduction schemes due to high cost of operation. In addition, many councils dispose of wastewater sludge in landfill, which significantly increases methane production.</p> <ul style="list-style-type: none"> o Does the recommendation sufficiently target landfill methane production and provide adequate policy solutions? • Does the recommendation adequately address the production aspect of the waste cycle?
--	---

Question 19	<p>Multisector strategy</p> <p>Do you support the package of recommendations and actions to create a multisector strategy? Is there anything we should change, and why?</p>
All Councils	<p>Necessary Action 15 – We have similar resource management comments as Question 8. We would like to see stronger recommendations around guidance regarding alignment, timing and how current RMA approaches will be brought in and phased out throughout RMA reform. We would like more focus on low carbon, resilient outcomes for Māori communities, incl. mechanisms for funding and implementation. We would also like to see more recommendations on the ways LG can bring adaptation and mitigation opportunities together, as these will be experienced together by our communities.</p> <p>Necessary Action 16 – We stress the need to ensure behaviour change is also supported with systems transformation-legislative changes, service delivery changes, and education. Monitoring will be essential to understanding whether future behaviour programs are working. What is LG's role in this?</p> <p>Necessary Action 17/Time-critical action 6 – We would like stronger directives on financial risk disclosure and bringing in target-consistent, long-term abatement cost values (carbon unit prices) into investment and policy decisions. We emphasise that clear standards are needed for LG to meaningfully participate.</p> <p>Necessary Action 18 – We have concerns over about how rangatiratanga will be properly enabled and use of this term in this context.</p> <p>Time-critical action 7 – We would like to see recommendations around support for LG staff who may be involved with the ETS-administrative aspects, helping those communities to understand how many credits they have etc.</p>
KDC	
FNDC	
WDC	
NRC	<ul style="list-style-type: none"> • Inclusion of abatement costs in cost-modelling and decision-making is encouraging and would be useful to be applied to local government.

	<ul style="list-style-type: none"> o Should abatement assumptions and procurement decisions regarding emissions be included in audit requirements for local government to clearly signal change? • Partnerships with industry are presumably covered in this section but receive scant attention. Government support of zero-carbon industry is essential to enable the realisation of the economic benefits during transition. New Zealand has a great opportunity to leverage existing knowledge and skills to develop low/zero-carbon industries that would benefit Northland such as low-emissions ship-building, high-value engineered wood products and low-emissions geothermal power generation. <ul style="list-style-type: none"> o Does the recommendation sufficiently support govt-industry collaboration to incentivise the zero-carbon economy? • A Māori emissions profile is useful, but may not enable rangatiratanga unless true partnership is acted on during the development and implementation of the emissions reduction plan. • The ETS currently allocates free NZU's to heavy industry, effectively insulating them from market-driven forces to incentivise emissions reduction. This also results in high-carbon products such as concrete being artificially low, as they are not paying the true cost of their carbon emissions. • Is the recommendation strong enough in regard to winding back the free allocation of NZU's to heavy industry?
--	--

Question 20	Rules for measuring progress Do you agree with Budget recommendation 5? Is there anything we should change, any why?
All Councils	We are supportive. We recommend that the development of any methods for tracking emissions and target accounting needs to include removals by peatlands, wetlands, and marine sinks.
KDC	
FNDC	
WDC	
NRC	<ul style="list-style-type: none"> • Using a production-based carbon accounting approach does not include the carbon footprint of imported goods. This risks undercounting at an international level if countries of origin do not count the emissions created in the creation of the goods. It also restricts the ability for price-signals at the consumer level to drive low-carbon market choices. Consumption-based carbon emissions data has been produced by StatsNZ in 2020 and is a useful resource at the regional level but is not used in national carbon accounting. This creates a centralised/national carbon management approach. <ul style="list-style-type: none"> o Is there need for further explanation or investigation of different carbon accounting approaches? • Given the large impact of land-use change in NZ's historic emissions, the potential exclusion of "cropland management, grazing land management, revegetation or wetland drainage and rewetting" (7.5.2) in NZ's NDC is of concern. <ul style="list-style-type: none"> o Should there be more clarity about how this will be addressed in future carbon accounting approaches?

	<ul style="list-style-type: none"> • The exclusion of forest management practices potentially impacts the ability of regenerating pre-1990 forest to be claimed for carbon credits (7.6.1). This may impact large parts of Māori owned or treaty-settlement land in the north. <ul style="list-style-type: none"> o Is there enough details on the exclusion of forest management and how accounting standards will improve this aspect over time? • Accounting of non-forestry carbon removals is currently not included in NZ's greenhouse emissions inventory (production or activity based). This has an impact on the ability to claim these as carbon offsets or generate income, and applies at multiple scales (e.g. on-farm offsets; regional carbon removal programs, national emissions accounting). • Should point Budget Recommendation 5.c.v be more directive to enable the inclusion of other biological carbon removal sinks such as peatlands within a set timeframe?
--	--

Part B

Questions 21-23	Nationally Determined Contribution (NDC) Do you support our assessment of the country's NDC? Do you support our NDC recommendation? Do you support our recommendations on the form of the NDC? Do you support our recommendations on reporting on and meeting the NDC? Is there anything we should change, and why?
All Councils	
KDC	
FNDC	
WDC	
NRC	<ul style="list-style-type: none">Investment in the ability for less-developed countries, in particular our pacific cousins is essential.<ul style="list-style-type: none">Should the report suggest a more specific level of overseas offset/investment to enable a just transition in the south pacific and elsewhere?

Question 24	Biogenic Methane Do you support our assessment of the possible required reductions in biogenic methane emissions?
All Councils	
KDC	
FNDC	
WDC	
NRC	<ul style="list-style-type: none">The commission's report assumes a similar socio-economic trajectory for agriculture continuing into the future. This ignores potential impacts of market shifts, carbon tax impacts on shipping and other drivers.<ul style="list-style-type: none">While it is difficult to know what agriculture will look like into the future, does the report need to go further in promoting and supporting the development of alternative, low/zero-carbon forms of agriculture?