

22 June 2023

Climate Change Commission
PO Box 24448
Wellington 6142



Submission to inform the strategic direction of the Government's second emissions reduction plan.

Ngā mihi nui ki a koutou kātoa. Whakatāne District Council (the Council) is grateful for the opportunity to submit on the Climate Change Commission's second draft advice package to central government (the Government). We acknowledge the extensive work undertaken by the Commission to provide this level of advice, and the implications of the recommended policy direction. We congratulate the Commission on reaching this significant milestone and what it might mean for climate policy in Aotearoa New Zealand.

At Whakatāne District Council, we share and welcome the urgent call for climate action across all levels of government in Aotearoa New Zealand. We recognise our own role in showing leadership and doing our part to mitigate and adapt to climate change, including through the unique relationships we have with communities, stakeholders and iwi. We believe local government has an important role in collectively reaching our national emission reduction targets and to contribute towards international goals under the Paris Agreement. However, we require support and resourcing to be able play our part.

As with many other parts of New Zealand, our District's communities are diverse and geographically spread, with several remote communities far from urban centres. We share and emphasise the Commission's objective of a just and equitable transition which considers the needs of all New Zealanders. A well implemented transition should create new opportunities, making sure we take care of our people while ensuring no one is left behind. For sustained climate action to take place over the coming decades a just and equitable transition needs to be in the centre of all decision-making.

Across the Whakatāne District, our communities have voiced the urgency of taking real and early climate action. Through our Climate Change Strategy in 2020 we set ambitious targets to take deliberate actions towards being a net carbon zero organisation (excluding biogenic CH₄ and N₂O) by 2030, and a net carbon zero District (excluding biogenic CH₄ and N₂O) by 2030. Aligning to, and in some cases exceeding, national emission reduction targets emphasises the importance of the issue and our commitment to essential action in the face of uncertainty. While we have done good work to progress against these targets, resource and budgets provides a major challenge.

On the following pages we set out some key considerations for the Commission regarding the second draft package to the Government. This includes key considerations for responding to climate change from a local government perspective alongside providing context of the unique aspects of the Whakatāne District. We have also included a table responding to the specific consultation questions.

Ngā manaakitanga,

Mayor Dr Victor Luca

Dr Victor Luca
MAYOR
Koromatua

Key considerations – Local Government

Defining roles and responsibilities:

- To support a unified approach and strategic alignment, local government requires a clear definition of its roles and responsibilities. This is particularly important as councils across Aotearoa New Zealand start regional and local climate change work, to avoid inefficiencies in battling this complex problem.
- If local government's role is not clearly understood, it will be difficult to allocate the appropriate resource and budget in long term planning.
- A collaborative, unified approach across central and local government is crucial to delivering climate action across Aotearoa to reach our climate targets.
- For any transitional actions outlined in the Emissions Reduction Plan (ERP), LG will require clear direction on existing levers, so that we can embed these in planning.
- Spatial planning is one of our key roles, and we need to ensure development doesn't lock in high emissions.
- The next ERP should provide much greater clarity about expectations to deliver decarbonising transport. The new vehicle kilometres travelled targets pose the risk of leaving smaller regions like ours behind, as the programme only focusses on the five largest centres. This could reduce access to funding and solutions.
- Local government has a significant role in educating communities and enabling local climate action. It is critical we are recognised as an implementation partner.
- Local government is regularly engaging with key stakeholders and the wider community in this space, and it is key we align on key messaging to deliver a consistent narrative.
- Local government is responsible for planning tools at a local level which need to be consistently delivered across the country to deliver adequate emissions reductions. For example, District and Spatial Planning.
- Councils currently carry out significant engagement with the community on a wide range of topics, with many already engaging on climate change-related issues. The Government also needs to engage with communities, and this should complement local government efforts.

Resourcing local government to take climate action:

- Local government has a crucial role to play in emissions reduction – both for our organisations and as local leaders – but we need funding, resourcing, and access to information to act.
- The size and rating base of each council differs across New Zealand; therefore, the opportunities of each council to effectively address and plan their climate response differs.
- A carbon neutral future will only be achieved through sustained climate action at a local level. Councils are viewed as leaders regarding climate change response in their regions. Appropriately funding local government to set their own ambitious climate targets and act will be crucial.
- Many of the actions outlined in the first ERP and recommendations in the second draft advice package trigger a concern of how local government will be supported and funded to carry out the required scale of changes needed. For example, local government is currently not adequately funded to build and maintain the public and active transport infrastructure necessary to carry out the mode shift proposed.

- Local government is currently going through a period of change and reform. This is an excellent opportunity to ensure that investment aligns with national and local emission reduction targets, focusing on the long-term benefits to communities.
- Local government has been leading research into different aspects of climate action and requires a place to collaborate and share findings, as well as access to funding to progress some of this work. For example, district emissions modelling tools, and legislative stocktakes.
- We would appreciate a consistent approach to measure and report our organisation, District, and regional emissions. Although there is no current mandate, it is key for local government to understand emissions sources so we can prioritise action with our limited funds.

Legislative alignment:

- Alignment across government agencies, legislation, national policy statements and plans is key to enable local government to align our strategic and planning approaches. For example, the RMA and Building Act do not currently align, especially around natural hazard risk management.
- The Government needs to align actions to local government planning processes and times frames (such as the Long Term Plan). This way we can embed climate change actions into our work plans and budgets.
- Local government is responsible for delivering the spatial and district plan. When there is a plan change within the district plan, we need to describe how the plan change is consistent with higher order documents. For example, Plan Change 4 requires us to outline what is in the National Adaptation Plan and ERP. It is therefore crucial that all legislation aligns.

Key considerations – Whakatāne District

Below are considerations for the Commission to note about the diverse nature of the Whakatāne District. These are offered as aids for understanding the unique context and strengths of our District and are priorities for Whakatāne District Council in our climate change response. The Government's policy will need to consider the diversity across New Zealand when formulating policy responses.

- Whakatāne is predominantly a rural region. Agriculture is our highest emitting sector contributing to 49% of our District footprint.
- Whakatāne has a high proportion of Māori. 47 percent of the District's population is of Māori descent. The wider Bay of Plenty region has the largest number of iwi within any region in New Zealand, of which seven iwi, 91 hapū and 100 marae reside within the Whakatāne District. Out of these entities, the majority have reached settlements with the Crown. We acknowledge that iwi and hapū all have varying capacity and resourcing to engage, appreciating that each partnership will look different.
- The Whakatāne District has a high deprivation rate, averaging nine on the decile deprivation level scale across the District. The inequity in our communities is one of the reasons for our strong emphasis on affordability and the need for accessible subsidies for businesses, organisations and individuals to progress climate initiatives such as energy efficiency (insulation, green building standards, renewable energy etc.).
- The District is experiencing rapid growth and development, with significant investment in the region through The Government's Provincial Growth Fund and Better off Funding.

- We are fortunate to have a diverse industry base. Our local economies are predominantly primary industries and manufacturing, eg. agriculture, horticulture, forestry and wood processing, as well as boat building, marine services and construction. These industries are sensitive to the Emission Trading Scheme (ETS), carbon pricing and any future biogenic methane pricing. With the region's unique landscapes and proximity to rivers, harbours and the coast, the tourism industry continues to be of importance for our future.
- The Kāingaroa Forest stretching across the Bay of Plenty Region and the Whakatāne District is the largest forest plantation in New Zealand and the second largest in the Southern Hemisphere. Furthermore, 48 percent of the Whakatāne District is covered in indigenous forest, housing many endangered native species including the North Island brown kiwi, blue duck/whio and North Island kōkako. Developments in the Emission Trading Scheme (ETS) and overall carbon pricing will have an impact on the relative makeup of native vs. planted forest in our District.
- The District has exposure to a high number of natural hazards and has experienced several significant civil defence challenges over the years. These have strengthened community resilience but have also resulted in large financial costs for many, including the Council. Responding to frequent natural hazard events continues to impact the wellbeing of our communities. The question remains - how do we ensure the resilience of our people and plan, as the frequency and severity of natural hazards and events are projected to increase due to climate change effects?
- The climate and land structure of the Whakatāne District presents a range of opportunities to generate renewable energy. Currently, the District produces more renewable energy than is consumed locally, mainly through generating hydro electricity from the Rangitāiki River. This is, however, supplied to the national grid and as such, does not benefit the District specifically. Other renewable energy opportunities to be explored further include solar and geothermal. These solutions require a considerable investment, which will create a financial burden to ratepayers, we require external funding to deliver these.
- Whakatāne has a high level of car ownership. This is made primarily of second hand and Ute vehicles. The next iteration of the ERP needs to prioritise a transition of this market.

Specific feedback on key questions from the Commission

Chapter and Recommendations	Questions	Level of Support	Comment	
<p>Chapter 1 – Introduction</p>	<p>Q1. In your view, are these frameworks effective for identifying the key actions for the Government to take as part of its second emissions reduction plan to ensure that:</p> <ul style="list-style-type: none"> • emissions budget 2 is achieved, and • Aotearoa New Zealand is well situated for emissions budget three and beyond? <p>Why/Why not?</p>	<p>Support</p>	<p>The Council supports the frameworks set up to identify importance of actions.</p> <p>We include feedback on specific areas throughout the remainder of this submission.</p>	
	<p>Q2. Are there any other issues related to our approach that you think should be addressed in our final advice?</p>			
	<p>Q3. Is there additional evidence or reference material that you think the Commission should consider as we generate the final advice we provide to government?</p>			

<p>Chapter 2 – The task for the second emissions budget</p>	<p>Q1. Do you support the overall draft advice in this chapter? Why/Why not?</p>	<p>Fully Support</p>	<p>The Council acknowledges that the first ERP laid the foundation, but further work is needed to reach our emission reduction targets. The second emissions budget is key due to the long lead in time to see reduction from action. The Council supports timely action across all sectors.</p> <p>The Council strongly believes that to put New Zealand in the best position to achieve net zero by 2050 will require more urgent and transformational change in this current decade than the proposed path provides. Supporting new opportunities is key, our communities require access to programmes to up-skill in the areas which will be in-demand.</p>
	<p>Q2. Have we missed anything important regarding the task for the second emissions budget?</p>		<p>Transport is one area where the co-benefits of reducing emissions, and evidence showing that more could be achieved in a short time frame, would justify exploring ways to move faster. Transport is a key area of influence for local government. Figure 2.4 (page 40) shows the lack of action in this sector posing a risk local government.</p> <p>The Council would like to see guidance and subsidies for the clean-up of contaminated land. We feel this area is missing and is an area for opportunity.</p>
<p>Chapter 3 – A path to net zero</p> <p>Proposed recommendation 1- Commit to a specific level of gross emissions for the second and third</p>	<p>Q1. Do you agree that gross emissions reductions are required to achieve and sustain net zero emissions? Why/Why not?</p>	<p>Fully support</p>	<p>The Council supports the need for government to set a limit on the use of carbon dioxide removals. This will be key to our operations as we record and measure our organisational emissions and have the option to include forestry removals in our footprinting.</p> <p>The Council agrees that the focus should be on reducing gross emissions opposed to using removals and offsets to reach targets. Committing to reducing gross emissions and transitioning to a low emissions economy will lead to healthier</p>

<p><i>emissions budgets, no less ambitious than 248 MtCO_{2e} and 158 MtCO_{2e} respectively and ensure that its policy choices align with delivering this outcome.</i></p> <p>Proposed recommendation 2- <i>Communicate indicative levels of gross emissions and carbon dioxide removals from forestry out to 2050 and beyond to guide policy development.</i></p>			<p>homes, improve wellbeing, and create new opportunities for our community.</p> <p>The Council would like to see carbon accounting rules around the use of removals in carbon inventories. For example, eligibility, frequency, and quality of removals.</p>
	<p>Q2. Do you agree with our assessment of the risks and implications of carbon removals in meeting and maintaining net zero emissions? Why/Why not?</p>	<p>Agree</p>	<p>The Council agrees that removals should not be directly equivalent to the emission reduction quantity. We agree that fossil fuels are locked underground for millions of years, and their release is not comparable to carbon sequestered in forests. There should therefore not be a direct amount comparison between the two.</p> <p>The Council notes the increased risk that climate change will pose on our forest through the exacerbation of forest fires, strong winds, storms, droughts, pests, and pathogens. We agree there is a risk of forests not being re-planted following harvesting events.</p> <p>The Council notes that forests have a role in reducing climate risks. Specifically, trees reduce erosion, coastal forests reduce coastal erosion and storm surge, kelp forests reduce storm damage. Forests also play a key role in protecting indigenous species by providing refuge. Urban forests have been linked to urban cooling effects.</p>
	<p>Q3. Do you support our proposed recommendation 1? Why/Why not?</p>	<p>Fully Support</p>	<p>The Council supports the proposed recommendation to <i>commit to a specific level of gross emissions for the second and third emissions budgets, no less ambitious than 248 MtCO_{2e} and 158 MtCO_{2e} respectively and ensure that its policy choices align with delivering this outcome.</i></p>

	Q4. Do you support our proposed recommendation 2? Why/Why not?	Fully support	The Council fully supports the need for government to signal an indicative level for carbon removals. It would also be helpful to have advice around which emitting activities can be offset by carbon removals. For example, only being able to use removals for emissions which cannot be reduced at source.
	Q5. Are there any other issues related to how setting a path to 2050 influences actions in the second emissions budget period that you think should be included in our advice?		More research needs to be undertaken on the carbon sequestering potential of carbon removals. Internationally, evidence is arising showing that the amount of modelled carbon removal was not the same as actual carbon removal. Removals should also have similar stringent considerations to offsetting. Being additional and high-quality forests.
	Q6. Is there additional evidence or reference material that you think the Commission should consider as we generate the final advice we provide to government?		International research into carbon offsetting forestry projects (such as REDD+) shows that native forest regeneration and protection is not delivering the expected carbon reductions. The commission should consider this risk when incorporating them into the budgets. Recent news ¹ is showing that offsets certified by Verra are not contributing to any extra sequestration. International learnings should guide our work.
Chapter 4 – Emissions Pricing Proposed recommendation 3- Make the emissions pricing system consistent with delivering the specific levels of gross	Q1. Do you agree that the NZ ETS should play an important role in driving decarbonization? Why/Why not?	Agree	The Council agrees that the ETS should play a part in the solution. We would like to see funds generated from the ETS used to support communities (specifically those who will be disproportionately impacted).
	Q2. Do you agree with our assessment that the current NZ ETS structure creates a high risk that afforestation will displace gross emissions reductions? Why/Why not?	Agree	<p>We agree that this will be the case. We see the co-benefits from afforestation (other sequestration), such as a biodiversity, providing food and resources, regulating water quality, and a place of cultural significance.</p> <p>We urge the commission to focus on native forests, restoring and protecting existing current forests as well as exploring other</p>

¹ <https://www.theguardian.com/environment/2023/may/23/ceo-of-worlds-biggest-carbon-credit-provider-says-he-is-resigning>

<p><i>emissions for the second and third budgets, and with the 2050 net zero target, by:</i></p> <p><i>A. implementing an amended NZ ETS that separates the incentives for gross emissions reductions from those applying to forestry.</i></p>			<p>sequestration opportunities such as soil, wetlands and salt marshes.</p> <p>The existing ETS architecture, is likely to result in extensive afforestation in the near term. This poses the risk in the future where we cannot plant at the speed required to continue to meet our net zero targets.</p> <p>The settings which incentivise afforestation could lead to afforestation in the wrong places. The government needs to focus on right tree, right place, right time. We need to support community groups who have expertise in their local environments. This also needs to look at wider biodiversity/ecosystem benefits. Pest control and the protection of current forestry stocks are also key to success.</p> <p>There is a risk that incentivising planting will not incentivise polluters to reduce their emissions.</p>
<p><i>B. developing an approach that can provide durable incentives for net carbon dioxide removals by forests through to</i></p>	<p>Q3. Do you support our proposed recommendation 3a? Why/Why not?</p>	<p>Support</p>	<p>We support proposal 3a. We see the value of forests (primarily due to the improvement in biodiversity and co-benefits, alongside carbon sequestration). However, we urge the commission to focus on reduction, and working with industry to reduce at source.</p> <p>The evidence provided in the draft shows that we need the ETS to reach the budgets. It is paramount that we get the settings right so that the benefits are equally shared.</p>
	<p>Q4. Do you support our proposed recommendation 3b? Why/Why not?</p>	<p>Support</p>	<p>We would like to see settings in the ETS which support iwi/community led reforestation projects. For example, restoration or pest control projects.</p>

<i>and beyond 2050.</i>	Q5. Are there other aspects of the NZ ETS or emissions pricing that you think should be covered in our advice?		<p>We would like to see a variety of ecosystems be included specifically wetlands and saltmarshes. We would like more incentives placed on protecting native forests, as the current settings prioritise plantation forests.</p> <p>There are several indigenous podocarp forests in the Whakatāne District, as well wetlands and saltmarshes. 90% of saltmarshes have been destroyed due to development, however, they are great carbon sinks. We would like to see these ecosystems be valued.</p>
	Q6. Is there additional evidence or reference material that you think the Commission should consider as we generate the final advice we provide to government?		n/a
<p>Chapter 5 – Whāia ngā tapuwae</p> <p>Proposed recommendation 4- Accelerate Iwi/Māori emissions reductions in conjunction with climate change initiatives, by exploring and implementing a mechanism to allocate resourcing direct to Iwi and</p>	Q1. Do you support the overall draft advice in this chapter? Why/Why not?	Fully Support	<p>The Council fully supports the draft advice in this chapter.</p> <p>The government needs to work in partnership with iwi/Māori to accelerate our transition to a low emissions future. Supporting localised needs is key.</p> <p>Throughout the Whakatāne District, Iwi/Māori have a strong commitment to climate action, including through Iwi Management Plans. It is key that resource is allocated to develop iwi led action plans and mitigation projects through direct investment.</p> <p>Tikanga and mātauranga Māori are key considerations and it is important to note these are different at different geographical locations.</p>

<p><i>increase funding to Māori landowners (Te Ture Whenua entities).</i></p> <p>Proposed recommendation 5- Ensure Iwi/Māori can drive the integration of mātauranga Māori into policy design, development, and implementation at central and local government level, by delivering sufficient resources to Iwi/hapū.</p>			<p>The current funding is insufficient and the process to obtain funding is difficult and resource intensive. Communication of potential funding streams could also be improved.</p>
	<p>Q2. Do you support our proposed recommendation 4? Why/Why not?</p>	<p>Fully support</p>	<p>The Council supports the direct allocation of funding. It is key that support is provided through application process. Iwi need to be involved in setting up this process, so that they can access and secure funding in the way that best suits them.</p> <p>The Council would like the funding to go beyond the iwi level and to also focus on hapū/whānau led action.</p>
	<p>Q3. Do you support our proposed recommendation 5? Why/Why not?</p>	<p>Fully support</p>	<p>The Council has secured Better Off Funding for an iwi policy hub, which could support this work.</p> <p>Sufficient resourcing needs to be allocated for this work as well as working to iwi timeframes.</p>
	<p>Q6. Is there additional evidence or reference material that you think we should consider? Is there any evidence that you would like to provide on ao Māori, Māori responses to emissions reduction or the Crown-Māori relationship that could increase our knowledge of key issues and risks?</p>		<p>The government must consider the resourcing, timeframes, and priorities of whānau, hapū and Iwi in the overall implementation of these changes.</p> <p>Government needs to provide resourcing and expertise to support whanau, hapū and Iwi involvement.</p>
<p>Chapter 6 – Maintaining and enhancing wellbeing through the transition</p>	<p>Q1. Do you support the overall draft advice in this chapter? Why/Why not?</p>	<p>Fully Support</p>	<p>The Council fully supports this advice. Several areas of our District have high deprivation rates (9/10). Our community is experiencing the impacts of the cost-of-living crisis, and a fair and equitable transition which focusses on the co-benefits of health and reducing household costs are key. The transition to low emissions will have particular impacts on marginalised, low-income communities.</p>

<p>Proposed recommendation 6- <i>Enable a fair, inclusive, and equitable transition for New Zealanders by expanding the scope of the Equitable Transitions Strategy to include compounding impacts of climate change and adaptation as well as mitigation.</i></p> <p>Proposed recommendation 7- <i>Make use of existing mechanisms to manage impacts of climate policies in the interim, rather than delaying climate action.</i></p>			<p>We support the improvement of well-being for Rangatahi in our District. Young people are disproportionately impacted with less resources to transition and will face cost burdens of the lack of action in the future. It is key Rangatahi voices are involved in the transition.</p> <p>Providing warm and dry buildings, primarily households is critical, but it is important that lower-income communities can afford these solutions. Energy efficiency changes need to be affordable and accessible. Local people need to be trained to support this work in ways that are funded and accessible.</p>
	Q2. Do you support our proposed recommendation 6? Why/Why not?	Fully support	<p>The Council supports a fair, inclusive, and equitable transition. We support expanding the scope of the equitable transition strategy through the inclusion of compounding impacts of climate change, adaptation, and mitigation.</p> <p>This should include investment costs as well as the ongoing maintenance cost of action. The example where the person who makes the change is different to the person who benefits (e.g., insulating a rental), is key to our District with only 43% homeownership.</p>
	Q3. Do you support our proposed recommendation 7? Why/Why not?	Fully support	<p>The Council supports making the use of existing mechanisms to manage impacts of climate policies in the interim, rather than delaying climate action.</p>
	Q4. Are there any other issues or aspects of wellbeing that you think should be addressed in our advice? Are there any gaps in our advice related to opportunities and barriers for maintaining or enhancing wellbeing through the		

	transition to a thriving low-emissions resilient economy?		
	Q6. Is there additional evidence or reference material that you think the Commission should consider as we generate the final advice we provide to government?		
<p>Chapter 7 – Agriculture</p> <p>Proposed recommendation 8- <i>Enhance advisory and extension services to farmers to enable them to respond to pricing and accelerate the adoption of emissions-efficient practices, appropriate land-use diversification, and emerging technologies to reduce gross emissions. These services should be co-designed and implemented in</i></p>	<p>Q1. Do you support the overall draft advice in this chapter? Why/Why not?</p>	<p>Fully support</p>	<p>The Council fully supports the overall draft advice in this chapter, including the removal of barriers to the deployment of emerging technologies to reduce agricultural emissions.</p> <p>Agriculture is our highest emitting sector, accounting for 49% of our District footprint. This sector emitted 545,534 tCO₂e in 2020/21. Enteric fermentation from livestock produced 74% of the agricultural emissions (402,769 tCO₂e). Livestock was responsible for most of the agricultural sectors emissions accounting for 96% (524,825 tCO₂e). Our large agricultural sector and low population size, mean our per person emissions are disproportionately high.</p> <p>Barriers to emissions reduction include:</p> <ul style="list-style-type: none"> • Distribution of R&D – sharing research which aligns with lifestyle and time. The farming community are busy, and they need research they can quickly read and understood. Research needs to be linked to funded solutions/trials which benefit farmers. • Technology needs to be financed and available. • There is a lack of clear messaging regarding what is expected.

<p><i>partnership with industry and Iwi/Māori.</i></p> <p>Proposed recommendation 9- Advance the agricultural emissions pricing system to:</p>			<ul style="list-style-type: none"> • A high proportion of the farming community work with a high risk of debt or are carrying inter-generational debt. • Money is invested back into the farm, and many do not have the ability to invest in solutions.
<p>A. <i>enable recognition of a broader range of emissions-reducing practices and technologies</i></p>	<p>Q2. Do you support our proposed recommendation 8? Why/Why not?</p>	<p>Fully support</p>	<p>We fully support this recommendation. As a Council we want our communities to easily access advisory services. It is imperative they have information about emissions-efficient practices, appropriate land-use diversification, and emerging technologies. We would like to see more education in this sector, and for central government to support local government to support transitions.</p>
<p>B. <i>incentivise gross emissions reductions in line with the 2050 target.</i></p>	<p>Q3. Do you support our proposed recommendation 9? Why/Why not?</p>	<p>Neutral</p>	<p>We support proposed change 9. We would like to see a broader range of emissions reducing practices recognised. We would like to see measures such as riparian planting, and pest control efforts on farms be recognised.</p> <p>The pricing of agricultural emissions has not been well communicated and the agricultural community have been blamed. There have also not been clear objectives for the community to understand what they need to achieve. As well as this there are no clear actions and the legislative outcomes across different acts does not seem to align. Agricultural products are one of our biggest exports and the industry needs to be transitioned appropriately.</p>
	<p>Q4. Are there any other aspects of the agriculture sector that you think should be covered in our final advice?</p>		<p>We seek more clarification on local government’s role as we transition the agricultural sector. We also want to ensure that our communities have access to the advice and research so that our community can incorporate latest technology onto their farms.</p>

	Q5. Is there additional evidence or reference material that you think the Commission should consider as we generate the final advice we provide to government?		
<p>Chapter 8 – Built environment</p> <p>Proposed recommendation 10- <i>Implement an integrated planning system that builds urban areas upward and mixes uses while incrementally reducing climate risks.</i></p> <p>Proposed recommendation 11- <i>Incentivise comprehensive retrofits to deliver healthy, resilient, low emissions buildings.</i></p> <p>Proposed recommendation 12- <i>Prohibit the new installation of fossil gas in buildings</i></p>	Q1. Do you support the overall draft advice in this chapter? Why/Why not?	Partially support	The Council suggests that this chapter could be strengthened with practical advice or actions that local government can use to implement at a local level. The focus should be short term wins we can achieve through current planning processes. Local government is responsible for spatial and district planning, and we require direction from central government in this space. Our plan changes have to adhere to the NAP and ERP and it is paramount this work is aligned.
	Q2. Do you support our proposed recommendation 10? Why/Why not?	Neutral	<p>The Council supports the proposal to build upward with mixed uses. However, we require more direction as to how to do this. It is important the RMA and building act align with this.</p> <p>Spatial and District planning are key areas that local government can have influence. Funding and guidance will be essential to support local government to embed climate risk into spatial plans. We require a consistent national approach, so we are all accounting for the same risks with the same targets/outcomes.</p>
	Q3. Do you support our proposed recommendation 11? Why/Why not?	Support	<p>The Council supports the proposal, but we have concerns about how this would be delivered in our community. Local government can lead in this space as we have relationships with our community, however, we lack the resources and funds to deliver this.</p> <p>Incentives work well for communities who can afford to make changes. Due to the high deprivation rates in our community, many families do not have the luxury of economic incentives. Many of these retrofits involve high upfront costs, which would require funding. The Council would instead like to see targeted</p>

<p><i>where there are affordable and technically viable low emissions alternatives in order to safeguard consumers from the costs of locking in new fossil gas infrastructure.</i></p>	<p>Q4. Do you support our proposed recommendation 12? Why/Why not?</p>	<p>Support</p>	<p>funds for low-income communities, and training courses where our people can upskill and deliver the retrofits needed.</p> <p>The Council supports prohibiting the installation of fossil gas in new buildings. However, we would like to see this expanded to existing buildings and homes. Natural gas makes up 58% of stationary emissions in Whakatāne and contributes to 11% of our gross emissions. Natural gas use for industry in Whakatane is significantly higher than other districts in our region. Our community, similarly, rely heavily on natural gas in their homes.</p> <p>The Council is currently focussing on transitioning towards renewable energy sources. We are running an Energy Management Programme where we track the energy usage at our 15 highest user sites. Fuel switching from natural gas to electricity has resulted in noticeable emission reductions. The barriers we face to transition are:</p> <ul style="list-style-type: none"> • High costs of electric boilers • Good infrastructure which is not ready to be transitioned yet • We have a small rate payer base so costs are significant • Long lead in times and time to order leading to long transition times • No mandated legislation so it is not seen as a priority. <p>We need this solution to be future proofed, with guidance on what we should be buying now to last the 20-year life span. For example, information about the refrigerant phase out process.</p>
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	Q5. Are there any other aspects of the built environment sector that you think should be covered in our final advice?		Supporting local government (with resource, knowledge, and funding) to deliver on the outcomes in the built environment is key. There are funds available for public sector (specifically schools) to remove all boilers, this needs to be extended to community facilities such as swimming pools.
	Q6. Is there additional evidence or reference material that you think the Commission should consider as we generate the final advice we provide to government?		
<p>Chapter 9– Energy and industry</p> <p>Proposed recommendation 13-</p> <p>Prioritise and accelerate renewable electricity generation build and ensure electricity distribution networks can support growth and variability of demand and supply.</p> <p>Proposed recommendation 14-</p>	Q1. Do you support the overall draft advice in this chapter? Why/Why not?	Fully support	<p>The Council supports the overall advice in the chapter. We agree that electrification is key to decarbonise our economy.</p> <p>We agree that government policy uncertainty is delaying building new generation electricity facilities. We would like to see policy which supports locally generated electricity.</p> <p>We agree that the current consenting system cannot enable a fast-paced and sustained build of renewable generation. We would like to see the joined-up thinking across energy, water, infrastructure, housing supply and climate change outcomes.</p>
	Q2. Do you support our proposed recommendation 13? Why/Why not?	Fully support	As electric cars and more heat pumps come onto the grid, power cuts are going to be a major health and safety issue for people if they can't charge their vehicle or heat their home. Government needs to look at ensuring the grid is always above the demand. We will need to identify suitable systems for investment and return for power generation. Investment into grid infrastructure is key, especially considering recent natural disasters. Focussing on local electricity generation will also improve community resilience.

Pursue more widespread process heat decarbonisation and establish mechanisms for other industrial sectors and processes to decarbonise.	Q3. Do you support our proposed recommendation 14? Why/Why not?	Support	The Council supports the decarbonisation of process heat and establishing mechanisms for other industrial sectors to decarbonise. However, regional centres like ours rely on a few big businesses, which can be higher emitters. For example, the Whakatāne Mill. The Mill employs a significant proportion of people, and if it is not transitioned properly, there will be job loss which will impact our economy.
	Q4. Are there any other aspects of the energy and industry sector that you think should be covered in our final advice?		Energy use in relation to crematoria could be an area of future focus.
	Q5. Is there additional evidence or reference material that you think the Commission should consider as we generate the final advice we provide to government?		
Chapter 10 – Forests Proposed recommendation 15 <i>Set and implement integrated objectives for the role of forests with respect to emissions mitigation and adaptation, while giving effect to the principles of Te</i>	Q1. Do you support the overall draft advice in this chapter? Why/Why not?	Support	<p>The Council supports the advice of the chapter. Forests are key to achieving our emissions reduction targets. There is a lack of clear direction for the quantity of afforestation required to reach targets and sustain net zero.</p> <p>The Commission has highlighted that a comprehensive national programme and clear objectives with forestry are key. As local government we manage some forestry resources so accurate look up tables and alignment to the ETS and RMA would be beneficial.</p>
	Q2. Do you support our proposed recommendation 15? Why/Why not?	Fully support	<p>We support the recommendation. We need clear objectives for forestry, specifically to outline the amount we require to reach our net zero goals and sustain them.</p> <p>Although the Commission has outlined the risks of relying on forests to meet the goals, these need to be incorporated into the</p>

<i>Tiriti o Waitangi/The Treaty of Waitangi.</i>			national programme and ETS. Forests in high-risk areas could be worth less. For example, forests at risk of erosion.
	Q3. Are there any other aspects of the forests sector that you think should be covered in our final advice?		Equity issues seem to be missing from the response. For example, indigenous people globally have lost rights to their land due to the commodification of nature; it is important Iwi/Māori are involved in the co-development of this work for this reason.
	Q4. Is there any additional evidence or reference material that you think the Commission should consider as we generate the final advice we provide to the government?		
<p>Chapter 11 – Transport</p> <p><i>Proposed recommendation 16- Simplify planning and increase funding of integrated transport networks that optimise public and active transport. For major population centres, the Government should also complete cycleway networks by 2030 and take steps to complete rapid</i></p>	Q1. Do you support the overall draft advice in this chapter? Why/Why not?	Partially support – some disagreement	<p>The target of 11% vehicle kilometres (VKT) travelled by active or public transport is incredibly ambitious, and most likely unachievable without significant policy measures being applied at a central government level. The single most useful tool in managing travel demand is the use of road pricing tools however there is no discussion on the role of this tool to support carbon reduction. It should be highlighted as a potential tool for both assisting with the funding of transport infrastructure investment and carbon reduction. We would strongly support a recommendation from the Commission that road pricing be enabled as a tool for use by Road Controlling Authorities to manage congestion, emissions and to support investment in low emission transport.</p> <p>The report notes that there needs to be greater clarity about what different local government entities are expected to deliver in this space. We disagree. The roles of local government are clearly set out in legislation in that TAs will provide local infrastructure, Regional Councils will provide public transport</p>

<p><i>transport networks by 2035.</i></p> <p>Proposed recommendation 17- <i>Rapidly resolve the barriers to scaling up vehicle charging infrastructure.</i></p> <p>Proposed recommendation 18- <i>Develop incentives to accelerate the uptake of zero emissions commercial vehicles, including vans, utes, and trucks.</i></p>		<p>services. Where there is confusion is at the central government layer with Ministry of Education delivering school bus services but with no imperative to do so in manner that supports reduced emissions or better community access to transport services. A strong argument could be made that these services should be controlled by Regional Councils so these can be integrated into the public transport services to deliver a wider set of community outcomes than simply providing a minimum standard for conveying students to school.</p> <p>The report speaks to a slow and fragmented funding system. We note that the recent Transport Choices CERF funding was delivered as a one-off fund, adding to the fragmented funding regime. Funding sources such as these need to be approached on a multi-year basis so that appropriate project planning and development can take place at a local level. This is true for other Crown funding sources which seem to be ad hoc rather than being planned and scheduled over reasonable time frames.</p> <p>The report notes that major population centres provide the best opportunity for increased uptake of active transport and public transport. While this is true there is an argument that delivering active transport infrastructure in smaller centres can be done at significantly lower cost than in major centres and may provide better reductions per dollar spent. In less built-up areas there is often more road corridor and other land available for delivering infrastructure with lower complexity that significantly lowers costs while still providing connectivity on key commuter and school routes.</p> <p>We therefore strongly disagree with the statement “Focusing safe infrastructure for walking, cycling, and public transport in major population areas is therefore critical to reducing transport</p>
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		<p>emissions". This should be worded such that infrastructure is focusing in areas where there is a clear case for investment to reduce VKT.</p> <p>As above we disagree with the recommendation presented that "Major Population centres" should complete cycleway networks by 2030. This should be broadened to incorporate all urban areas. Providing for a more equitable investment across the country and potentially achieving similar reductions in CO2 emissions for the same level of investment.</p> <p>We strongly disagree with the proposition that local government barriers hinder investment in rural and lower socio-economic neighbourhoods. There is no evidence to support local councils being a barrier to investment and indeed there are many districts/cities that encourage and enable this investment. We also note that EECA grant funding of EV charging infrastructure is predominantly targeted at built urban areas and there has been next to no investment in rural, lower socio-economic areas of the country. This underinvestment will exclude these areas from the transition to EVs likely placing significantly higher costs on those who can least afford it as the cost of EV travel vs ICE travel declines.</p> <p>Despite the report noting that E-Bikes and active transport are critical pieces in delivering the required emissions reduction there is no recommendation relating to encouraging uptake of e-bikes as a form of transport, rather focusing on the requirements of electric cars. E-Bike uptake in NZ has been strong but it is predominantly amongst the wealthy who can afford the upfront investment. We would strongly recommend that the report discusses the barriers to uptake of E-bikes and makes recommendations to remove these. We note that E-Bikes do not</p>
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		<p>draw anywhere near the same power from the grid as E-Cars and therefore do not have the constraints that E-Cars will face in terms of electrical network capacity and can provide a raft of social benefits beyond that of E-cars such as improved population health, reduced parking demand, and enabling compact urban forms (also noted as key to reducing carbon emissions). In other countries E-Bikes are currently having a much more significant impact on carbon emissions than E-Cars and the importance of this mode needs to be recognised and should be strongly supported by the Commission.</p> <p>Transport is an area of influence for local government as we are responsible for investing in roading, footpaths, public and active transport infrastructure in our Districts. We also work alongside Regional Council who deliver public transport and Waka Kotahi in their management role of the State Highway network.</p> <p>Figure 2.4 shows the impact of policy on the emissions budgets, we are concerned government is not doing enough in this space, as even the high policy impact work does not get us close to the transport budget.</p> <p>We would like to see more funding and long-term planning in this area, so that we can deliver low-emission, low-cost transport options. Current ad hoc investment from the likes of the CERF Transport Choices fund does not allow sufficient time for robust planning and prioritisation of work to be undertaken, ultimately reducing the impact of these investments.</p> <p>Transport is our District's the second highest emissions area, accounting for 28% of our emissions. As we aim for net zero 2030 as a district (excluding biogenic CH4 and N2O), reduction and</p>
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			<p>transition in the transport sector will be key to our success of meeting this goal.</p> <p>An equitable transition where everyone is brought along is key for us. Due to high deprivation rates many of the solutions proposed by central government will not work for our community. For example, high upfront costs for EVs.</p>
	Q2. Do you support our proposed recommendation 16. Why/Why not?	Do not support	We do not support this proposed change, as it only focusses on major population centres and rapid transport solutions. We feel our community will be left out if funding and resource is ring fenced to major population centres.
	Q3. Do you support our proposed recommendation 17? Why/Why not?	Support	<p>We support proposed change 17. We are working to electrify our fleet and we are seeing barriers due to the existing infrastructure. The barriers we see are:</p> <ul style="list-style-type: none"> • The initial investment costs to buying an EV • increased electricity bills linked to energy poverty • long distance which would recover significant infrastructure for few vehicles, and • current technology would not suit some of our sectors e.g., agriculture
	Q4. Do you support our proposed recommendation 18? Why/Why not?	Support	We support recommendation 18, however, we want to ensure the government does not invest in one size fits all. Every industry requires heavy vehicles for different reasons. We would like government to invest in smaller communities like ours.
	Q5. Are there any other aspects of the transport sector that you think should be covered in our final advice?		We would like to see the government focus on transport solutions outside of cars. In the Whakatāne District we have a strong investment programme in active transport but the scale and speed of delivery required will require more investment from central government in a consistent and sustainable manner so that the skills and resources required to deliver projects can be planned and managed. Investment in our public transport

			<p>networks is woefully lacking and there is no directive for improvements to be made in this area from central government.</p> <p>We would like to see investment into community groups which are promoting this work. For example, setting up bike hubs in the community where people can have lessons, repair bikes etc.</p> <p>We urge the commission to investigate and include freight emissions. In Whakatāne 38.8% of the transport sectors emissions come from marine freight. The port is in Tauranga and we have no control over this, so we would urge government to invest in research and technological solutions to reduce these emissions.</p>
	Q6. Is there additional evidence or reference material that you think the Commission should consider as we generate the final advice we provide to government?		
Chapter 12 – Waste and fluorinated gases	Q1. Do you support the overall draft advice in this chapter? Why/Why not?	Fully support	The Council fully supports the draft advice in this chapter, however, we believe the policy instruments can be expanded further.
Proposed recommendation 19a <i>Apply regulatory and policy instruments to achieve the optimal use and efficiency of landfill gas capture</i>	Q2. Do you support the first half of our proposed recommendation 19a? Why/Why not?	Fully support	The Council fully supports recommendation 19a, however, we believe these regulatory and policy instruments should also apply for any waste-to energy facilities and that should include anaerobic digestion.
	Q3. Do you support the second half of our proposed recommendation 19b? Why/Why not?	Fully support	The Council fully support recommendation 19b, however, we believe these recommendations should also apply for any waste-to energy facilities and that should include anaerobic digestion.

<p><i>systems and technologies at all landfills.</i></p> <p>Proposed recommendation 19b <i>Improve the accuracy and transparency of landfill gas capture data by reviewing and strengthening relevant regulatory and policy tools.</i></p>	<p>Q4. Are there any other aspects of the waste sector and F-gases that you think should be covered in our final advice?</p>		<p>The Council note that the report mentions the proposed F-gas destruction plant in Kawerau. However, we believe the priority should be to ensure that the operations and controls are in place to ensure such gases are removed and contained from products in the first instance. Too many such gases are vented in processing other waste streams such as scrap metals. Product stewardship schemes for these gases need to be legislatively mandated (they are part way there) and monitored.</p>
	<p>Q5. Is there additional evidence or reference material that you think the Commission should consider as we generate the final advice we provide to government?</p>		<p>N/A</p>
<p>Chapter 13– Research, science, innovation, and technology</p>	<p>Q1. Do you support the overall draft advice in this chapter? Why/Whynot?</p>	<p>Support</p>	<p>We support this advice. However, we would like the commission to consider how they will distribute the research and make it available for lower income communities and across different sectors who have different requirements. People on the frontline need to be involved in national research priorities.</p> <p>We support openly available climate change data and information and education. Research needs to be communicated in a way that everyone can use and understand. It is also imperative that the research aligns to everyday life and what this means for our communities so they can see themselves in the transition. Research needs to align to everyday actions, and link to funding sources.</p>
	<p>Q2. Are there any other aspects of the Research, Science, Innovation and Technology sector that you think we should consider as we prepare our final advice?</p>		<p>From a local government perspective, we require a platform where practitioners can collaborate and share material.</p>

			We require a tool to measure emissions (both as a District and organisation). This tool would allow us to plot actions and model future emissions.
	Q3. Is there additional evidence or reference material that you think the Commission should consider as we generate the final advice we provide to government?		N/A
Chapter 14 – Funding and finance	Q1. Do you support the overall draft advice in this chapter? Why/Why not?	Support	<p>The Council supports the advice in the chapter. We support a strategic and ambitious approach to funding. The funds identified in the chapter pose the risk of missing small business and some community members who may not have the resource or knowledge to access fundings. For example, the clean car scheme.</p> <p>We agree that placing people at the centre is key. Funding and finance need to filter through to communities like those in the Whakatāne District. It is key that the process to secure funding is fair, equitable and easy.</p> <p>There is a risk of using the ETS to fund the Climate Emergency Response Fund due to its temperamental structure, and current low carbon price.</p> <p>Figure 14.1 shows a lack of transport funding. This is a key area for local government as we deliver roading networks. They are also lifelines in emergencies. As well as this many roads are exposed to natural hazards which will be exacerbated due to climate change, so it is key they are funded well.</p>

	Q2. Are there any other aspects of the funding and finance sector that you think we should consider as we prepare our final advice?		<p>Funding sources for the following are important:</p> <ul style="list-style-type: none"> • Refrigerants – being able to afford lower GWPs • Natural gas elimination • Local community led solutions • Solutions for low-income households <p>We would also like the commission to comment on making the process equitable and easy. For businesses and community groups the process is difficult and lengthy. Many of the current funding routes are not well communicated.</p>
	Q3. Is there additional evidence or reference material that you think the Commission should consider as we generate the final advice we provide to government?		We need to look at how countries overseas are funding climate action. For example, the cap-and-trade system in Quebec, provides funding directly to low emission projects and to families to implement household actions.
Chapter 15 – Circular economy and bioeconomy	Q1. Do you support the overall draft advice in this chapter? Why/Why not?	Fully support	<p>The Council fully supports the draft advice in this chapter.</p> <p>The advice includes information on how centralised governance could provide support. Support is also needed to link different sectors aiming to achieve circular economies and sustainable bioeconomies. One example is between local authorities and industries. There are many opportunities for these sectors to work together (Ecogas and Auckland Council food waste is one example). But with limited resources local authorities often have difficulties putting ideas into place. For example, there are opportunities for council collected organic wastes to work with timber or fruit farm industries in composting.</p>
	Q2. Are there any other aspects of the circular and bioeconomy sector that you think should be covered in our final advise?		

	Q3. Other evidence- Is there additional evidence or reference material that you think the Commission should consider as we generate the final advice we provide to government?		
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