



Te Kaunihera-ā-Rohe o Ngāmotu

**New Plymouth
District Council**



TE KAUNIHERA Ā ROHE O
WHAKAAHURANGI

STRATFORD
DISTRICT COUNCIL

Our Reference

F22/55/007-D24/41284

Kia ora

Taranaki Mayoral Forum Submission on the Second Emissions Reduction Plan Discussion Document

1. The Taranaki Mayoral Forum is very concerned that the country is not on track to meet its emissions targets. Successful mitigation is the most effective and efficient way to stop the threat climate change poses to our communities. That some of the reasons we are no longer on track are outside the Government's control does not change the fact that stronger action is needed.
2. We support a least-cost approach to emission reductions. However, we are doubtful that only focusing on net reductions will deliver this. Carbon removal through forestry cannot be relied upon forever to drive mitigation and carries a range of risks. The longer the country leaves action on reducing gross emissions, the greater the risk of either a failure to abate or transition shocks. This would bring significant costs. Conversely, successful mitigation will result in a more resilient economy and reduce the adaption requirements on our communities.

Managing Transition Risks

3. We are also very disappointed by the scrapping of a range of work programmes aimed at supporting the transition to a low-emissions future, many of which were targeted at Taranaki. Whether this transition be Government-led or market-led, the impact on our region will be the same. The reversal of the oil and gas exploration ban may provide some economic activity, but the long-term challenge remains: how to transition Taranaki away from an economy built around oil and gas. Our communities need new opportunities to provide for their economic wellbeing. While the responsibility for this by no means falls on Government alone, it is a key player.
4. Providing efficient regulatory pathways for new low-emissions industries, such as offshore wind or hydrogen production, is a vital part of Taranaki's long-term economic well-being. We welcome the work underway in these areas and its prioritisation. More broadly, we call on the Government to support the vision of Taranaki being a centre of renewable technology excellence for New Zealand. There is a wealth of energy expertise in the region that is ready to turn their abilities towards renewable technologies. This includes the organisations such as Venture Taranaki and Ara Ake. Taranaki's world-class wind resource and ample sunlight is waiting to be harnessed. And our location in the North Island, close to major demand centres, offers transmission benefits.

The Emissions Trading Scheme

5. To avoid the unintended consequences of mitigation, we support the introduction of restrictions on whole-farm conversion to forestry on highly productive land. The locking up of large swathes of the country in certain exotics, mainly *Pinus radiata*, carries with it a range of risks. Risks from the impacts of pests, diseases and extreme weather events undermining long-term carbon storage, in addition to wilding pine problems. There are also costs associated with the toll logging trucks take on local roads, and the reduced contribution forestry makes to the regional economy compared to farming.



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forestry conversion requires careful development, and we caution against a blunt restriction based on land use classification alone. All exotics do not carry the same risks – some can also provide important benefits; for example, for land stabilization. Neither do all locations. There may be local circumstances where conversion is, or is not, warranted that land use classification does not capture. Any restrictions need to be based on a nuanced assessment of different species, land use and other environmental benefits. An approach that allows for regional flexibility and local decision making is needed.

7. Further work is also required to incentivise native reforestation as a mitigation tool. Biodiversity credits offer a potentially powerful tool to make up the financial short-fall of native planting vs. exotics under the New Zealand Emissions Trading Scheme (NZ-ETS). There is also considerable opportunities for catchment-level engagement, including by the Government, to support individual land-owners in their planting efforts.
8. Other carbon sequestration options also need to be recognised. The Government’s proposal to develop a regime for carbon capture, utilisation and storage is a potentially useful pathway, particularly with the reversal of the oil and gas exploration ban. However work on blue carbon, soil carbon and wetland sequestration accounting methodologies also require priority. The latter two could be particularly useful in recognising on-farm sequestration as part of a pricing system for agricultural emissions.

Sector Matters

9. The emphasis on giving agricultural producers the tools and technologies they need to reduce emissions, while maintaining productivity and profitability, is welcome. As international markets place greater pressure on our sectors to reduce emissions, it is crucial our producers have what they need to succeed. To protect our export industries, New Zealand must not fall behind in meeting international expectations. Government investment and regulation of agricultural emissions needs to be developed with these international expectations in mind. We also strongly recommended a focus on supporting diversification, such as through Taranaki’s Branching out Programme.
10. We commend the Government’s decision to exempt local authorities from the Credit Contracts and Consumer Finance Act 2003 so that we can restore voluntary targeted rates schemes. This gives councils an important tool to support their communities to improve their energy efficiency and reduce their dependence on natural gas if they so choose. However, we call on the Government to do more to assist households in transitioning to alternative energy sources. Not only will this help avoid energy hardship as costs increase, it will better ensure that gas reserves are available for industrial uses, particularly those that have few viable alternatives at present.
11. In addition to energy security, our communities need access to safe and secure low-emission transport options. Public transport in New Zealand’s regions plays a crucial role in this. It is not enough to just focus public transport investment in Auckland and Wellington. Work to decarbonise heavy vehicle, aviation and maritime transport is also important. We reiterate the need to create an enabling environment for innovation in these industries, particularly power to X technologies like green hydrogen. Along with improving EV charging infrastructure, we also urge more be done to support the electrification of private vehicles.



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12. Finally, we agree that the Government should further investigate improvements to organic waste disposal and landfill gas capture. User up-take of organic waste collection schemes remains a challenge. A key element of the Government's investigations should be reviewing the compliance tools councils have to support organic waste collection, waste reduction and waste diversion. There is also a potential role for Government to be working with manufacturers to reduce waste in general.
13. The Taranaki Mayoral Forum welcomes this opportunity to inform the development of the second emission reduction plan. We look forward to more detailed conversations with the Government on the role Taranaki can play in reaching our emissions targets.

This submission is endorsed by:

Mayor Neil Volzke (Forum Chair)
Stratford District Council

Mayor Phil Nixon
South Taranaki District Council

Mayor Neil Holdom
New Plymouth District Council

Charlotte Littlewood
Taranaki Regional Council Chairperson