

**Environment and Conservation Organizations of Aotearoa New Zealand published the following:**

The Climate Change Commission has issued its 2021 Draft Advice for Consultation for public submissions. The report was released on 31 January and the **submissions period closes on 28 March 2021**, but it urges us all to both tune into webinars and other outreach and to submit early so they can digest submissions before the close-off date. The Independent Commission has then to report to government by 31 May. It urges us all to submit as soon as possible using their online tool.

The independent Commission was established under the Zero Carbon Act and has the job of advising the government on their tasks below. The report has an Executive Summary, at the head of the 189 page Draft Advice, and further Evidence papers that can also be accessed via their online tool. The key tasks are:

1. The proposed first three 5 year emissions budgets and recommendations that will provide a framework for the country's first emissions reduction plan, advising the Government on how the emissions budgets could be met.
2. Advice on whether the first Nationally Determined Contribution (NDC) for Aotearoa is compatible with contributing to the global efforts to limit warming above 1.5°C above pre-industrial levels. Our advice outlines how the current NDC is not currently compatible.
3. Advice on what potential reductions in biogenic methane might be needed in the future (this is not a review of current targets). Our advice states that decreases will be required by 2100.

They stress “this is draft advice, and we are committed to a true consultation. We are prepared to review and change any part of our work during the consultation period. Please take the opportunity to submit your feedback.” When the Commission has revised and finalised its advice, it will send it to the Government, which then has until the end of 2021 to respond. In 2022 the Commission will monitor how their advice has been received and acted on.

**Initial reactions to the Draft Advice**

ECO has not been through the whole paper yet in detail but initial discussions with a range of colleagues in climate change circles indicate a number of issues of substance. We note a few of these here:

1. The Commission has tried to avoid “science fiction” by assessing pathways forward in the light of existing known technologies and practice, not by relying on some fictional future technological fix.
2. The Draft Report assesses our current Nationally Determined Contribution (NDC) under the Paris Agreement (ie promises to reduce greenhouse gas emissions) as insufficient to achieve our share of the reductions to limit the global temperature rise to 1.5C.
3. The emissions budgets suggested by the Commission are not consistent with achieving this fair target reduction compatible with 1.5C.
4. Despite some good discussion on the principles of fairness, these haven't translated into the emissions budget suggestions offered.
5. One critic notes that the emissions budgets presented are actually less stringent than the National Government's 2015 targets by 43 megatonnes.
6. The Commission has not presented any assessment of the costs of inaction – the “do-nothing option” so that any costs of action can be put in that perspective.
7. Critics suggest that the Commission should have paid more attention to the urgency of taking action on all fronts now, and not leaving as much of the heavy lifting until after the first 15 years, as the Commission tends to do.

8. The Commission has estimated that costs of action are fairly low in the first 15 years – but some people think it might be a lot better if we could take more vigorous action to achieve more and lower the future costs of emissions reductions.
9. The Commission has done a good job of recognising the value of nature and the sequestration of carbon by forests as well as noting the desirability of having much more native forests as a much more durable and beneficial and resilient biodiversity store. ECO's view is that this is so, but that the Commission is putting too much emphasis on planting new native forest and that much more could be achieved for less cost by helping to protect existing but degrading native forests (say with fencing support and weed control) and by providing much more protection for much stronger carbon stores such as tussocks, wetlands and mangroves, and other native ecosystems.
10. Some consider that the Zero Carbon Act and the Commission's advice cast Maori as to be consulted but not in the sense of independent nations with power and authority.
11. There is a lot of discussion about the Commission's reference to using off-shore mitigation to supplement the domestic New Zealand's emissions reductions in the NDC. One issue is that there seems to be no inclusion of this pathway in the calculation of the costs of meeting 1.5C- compatibility.
12. The phase-out of coal burning is welcome but it will take Fonterra and Genesis energy finally to respond effectively and that Tiwai's electricity use be made available for other activities.

This list is only a small selection of comments and reactions in the first few days of the availability of the Draft Report. ECO will continue reading and welcomes advice from Members, Friends, experts and other organisations so that we can craft our responses. Please send these to [eco@eco.org.nz](mailto:eco@eco.org.nz) with Climate Draft Report in the subject line. As we hear more analyses, we will let readers know, and we will hope too that the Commission makes the full list(s) of questions available on line. As ever, we recommend that submitters also feedback on matters you consider significant that are not asked about.

### **Consultation and engagement**

The Commission has scheduled a series of Zoom webinars. Also see the [consultation and engagement web page](#). The consultation page provides only for an online survey. ECO has requested that they provide the full text for the survey online in a word or .rtf format so that organisations and individuals who need to know what they will be asked and to prepare for questions or discuss them with colleagues can do so in advance of or instead of using the survey. Online submission making can be a nightmare at the best of times and is hopeless for organisations that need to consult with members.