



SustainedAbility
disability justice climate action

Submission Template for the Climate Change Commission's Draft Advice

Developed by Pacific Climate Warriors, SS4C, 350 Aotearoa, Generation Zero, Forest & Bird Youth, Oxfam, Zero Waste Network Aotearoa, The Rubbish Trip, Para Kore and Coal Action Network. Disability responsive climate change position, contributed by SustainedAbility.

**see top of pg 2*

With the [Climate Change Commission's advice](#) comes a real opportunity to move forward. This is our chance.

With your help, this will be a roadmap for a better Aotearoa for everyone. Together, we can create an equitable and Zero Carbon Future. Climate change affects individuals and communities to different extents and exacerbates existing inequities. We have an opportunity for climate action in Aotearoa to address intersecting issues including poverty and housing, and so much more. In other words, this can be a step towards climate justice, by centering intersectional social issues in the act of mitigating and adapting to the climate crisis.

Now is our chance to create the kind of future we wish to have ourselves and pass on to our mokopuna. It is our chance to stand alongside those living on the frontlines of the climate crisis. It is our chance to be a part of the most transformational change possible to safeguard our future.

The situation is urgent so any real action we can take makes a big difference. As the inaction continues, our generation is becoming more and more scared. We must realise the situation for what it is: a climate crisis, and act now. This starts with setting **ambitious targets** and taking meaningful action. It starts with comprehensive and meaningful **engagement with Tangata Whenua, disabled people** and our communities, younger generations and all structurally oppressed groups.

We must go further for the sake of our future. **This is our chance and we must seize it.** Otherwise, we are denying our generation and future generations the right to a livable future.

Time to write your submission

*This template was written by many different groups and organisations to support you to make a submission on the Climate Change Commission's draft advice. We acknowledge that we do not bring experience or expertise from all communities, or all sectors.

Some climate action organisations involved in this group submission are still on the journey of understanding how best to support climate justice in Aotearoa. We acknowledge the current and past harms of focusing on a “zero carbon at all costs” approach to address climate change. Our organisations acknowledge the need and commit to progressing our understanding of climate justice, by giving space to climate justice organisations and structurally oppressed communities that are most impacted by climate change, while examining the power we hold in these spaces. This is also critically important mahi for the Climate Change Commission, and any agency or organisation implementing the Climate Change Commission's recommendations.

This submission guide is not exhaustive, and we welcome feedback on how it could be improved.

The closing date for [submissions](#) is 28 March 2021.

Before you get started:

Submissions are **most effective** when they are **unique and authentic** to the person who is writing it. They definitely do not need to be overly technical. You just need to share your story, why this issue matters to you and what specific change or action you want to see.

Sharing your feelings and reasons for caring can be just as, if not more, effective as having a deep understanding of the ins-and-outs of the policy. We know it can be really daunting to write your own submission from scratch, and that this often means that young people don't have their voices heard on important issues that will fundamentally impact them the most.

For this reason, we are offering this template to make the submission writing process more accessible. But please remember that **this is your chance to have your voice heard**, and that

the submission will have the **most impact if it is not a direct copy-paste** from the template below, but unique to you. **Your voice matters - share it!**

How to make a submission:

- Head to the [Climate Change Commission's website](#)
- Complete the 'Introduction' section
- Scroll down to the bottom of the next page and select 'I want to continue with the consultation questions'.
- Enter in 'Your one big thing'
- Then click "I want to continue with the consultation questions"

KEY POINTS TO REMEMBER

- ★ The Commission is looking for unique and authentic submissions to make sure you personalise the template below as much as you can.
- ★ You could add why this issue matters to you and how climate change affects you/ your community.
- ★ The below recommendations have been contributed to this template by various organisations across Aotearoa. These are the points our organisations believe should be changed or added to strengthen the Climate Change Commission's advice. Feel free to copy/paste them if needed, but you'll have the greatest impact if you write a couple out in your own sentences!
- ★ Please note that we have offered more general recommendations in Part One, and more focused recommendations in Part Two to respond to specific questions from the Commission.

Part One: Your 'One Big Thing'

The first part of the consultation gives you the opportunity to tell the Commission the one big thing that you feel is really important that they know.

My name is [insert name here]. I am [insert age here] and am from [insert where you are from here].

I care about climate justice because [insert your own sentences here].

Here are some ideas that we think are important to highlight in this section. **We suggest you choose a paragraph below that highlights some key intersecting issues to get you started, and then select a few of the key recommendations in the second box.**

Ideas of what you could start off with in this section:

- ★ We know that we are in the midst of a climate crisis and the Government has recognised it as such. Transformational and lasting change across society and the economy will be needed to address this crisis in a just, equitable and sustainable way.
- ★ The tools we need to reach our targets and address climate change in Aotearoa already exist, and have been practiced for centuries by Indigenous communities. We must recognise and uplift the knowledge and indigenous wisdom that will help get through the climate crisis and has long been held by Māori in Aotearoa and by Indigenous peoples all over the world. As we sit on the brink of environmental collapse, **we must follow the leadership of Indigenous communities who have for so long been fighting for the protection of Papatūānuku, and those communities on the frontlines of pollution and climate impacts.**
- ★ The land, air and water bind us together. Climate justice must create and foster the solidarity and equity needed to stand up for a liveable planet and fairer society. If, through our climate solutions, we ensure everyone will have what they need to thrive and fully participate, we are on the way to centering justice. **Through the actions we take to mitigate and adapt to climate change, we must also work to repair historic oppression of frontline and vulnerable communities.** As we have outlined, addressing the climate crisis and centering climate justice in this brings with it not only opportunities to rectify the balance between us as a people and the natural environment but also many opportunities to restore justice and balance in our society.
- ★ Working toward climate justice to ensure that no one gets left behind means acknowledging that **climate change and its drivers negatively and disproportionately impact disabled people.** These systems have actively oppressed disabled people throughout society, and the policies we currently have will not uphold disability rights and justice now and as the climate crisis escalates.
- ★ Disabled people and disabled communities are not passive victims of climate change; systematic oppression has made them vulnerable. Disabled people are leaders and innovators who have valuable climate solutions that will help everyone through the climate crisis. **Disabled communities need to be supported and resourced to create an equitable future. When we create disability responsive solutions, all people benefit.**
- ★ It is key that our narrative and approach must be one of **intersectionality across all forms of oppression, including women and diverse genders** - only with this

narrative can we build the collective response necessary and ensure action we take to address the climate crisis recognises both the experiences and situations; past, present and future of communities, especially those already overburdened and marginalised, and works to restore equity.

For these reasons I wish to make the following recommendations to He Pou a Rangī, Climate Change Commission [choose from our recommendations below and add your own]:

Some key recommendations for this section:

- ★ **The Commission's proposed budgets need to be substantially enhanced** to create deeper emissions cuts over the next decade and better align with efforts to keep warming to 1.5 degrees.
- ★ **We need better climate education** so that each sector can confidently and knowledgeably transition to more sustainable practises, and so younger generations have the knowledge and are empowered to join our movement for climate justice.
- ★ The Commission's advice must recognise New Zealand's context as an island nation in the Pacific; **our response and actions to addressing the climate crisis must consider the impacts on the Pacific region, and provide adequate support for Pacific island countries** to adapt through greatly enhanced climate finance.
- ★ The focus on climate change expertise vs. representation may have impacted the perspectives on timeframes highlighted in the draft advice.
- ★ The commission's proposed plan fails to approach the interconnectedness of the many crises we face, including **the intersection between climate change and the biodiversity crisis**. This is despite constant warnings from experts on both climate change and biodiversity.
- ★ To fully understand the intergenerational impacts of this proposed climate plan, the Commission must undertake **meaningful youth engagement programmes**. Future generations will have to live with the policies proposed in this report and their consequences - we deserve a seat at the table.
- ★ **The commission must take into account all disabled people, disability rights and justice in its recommendations to the Government**. I/we recommend that the commission set up a formal disability working group, in order to create equitable disability responsive recommendations and engagement.
- ★ We must also **understand the wider social impacts of this proposed plan through undertaking meaningful community engagement**. Structurally oppressed

communities will be hardest hit if the government and Commission do not work alongside them and centre climate justice.

Part Two: *The Six Big Issues*

The Climate Change Commission has identified 6 issues that framed its thinking as it developed a path for Aotearoa to meet its domestic targets and international obligations.

*Here are some of our thoughts to help guide your response to these questions. **Choose the points that speak to you for each question and aim to expand on them with some of your own thoughts.***

1. Do you agree that the emissions budgets we have proposed would put Aotearoa on course to meet the 2050 emissions targets?

Our View: DISAGREE

Key Points to explain your answer

- ★ **The Commission's approach is not ambitious enough.**
 - The first three carbon budgets take a very cautious and incremental approach to reducing emissions, requiring larger cuts in later years.
- ★ **The emissions budgets should reflect New Zealand's commitment to global equity and fulfillment of our obligation as a developed nation.**
- ★ **Agricultural climate pollution must be reduced further and faster.**
- ★ **The advice on waste should consider *all* waste streams**, and consumption-based measurements.

Extra info to write your own submission!

- ★ The Intergovernmental Panel on Climate Change's 1.5 degree report outlines that for a 66% chance of averting climate catastrophe, **we must approach emissions reductions with deep cuts in emissions starting immediately.** The Commission's proposed approach is not ambitious enough and risks passing many tipping points, which would put us on a [hothouse earth trajectory](#).
- ★ The proposed emissions budgets **must take into account the commitment to global equity and New Zealand's obligations as a developed nation** that is noted in the NDC section of the report. The legislation describes the purpose of emissions

budgets to be for meeting the 2050 target AND New Zealand contributing to global efforts for 1.5 degrees (section 5W). There are various policy areas where greater action can be taken in the next decade to enhance the first two budgets for greater consistency with IPCC's 2030 pathways for 1.5 degrees (outlined under question 4), while also meeting the 2050 target.

- ★ I/we **do not agree with the Commission's plan to reduce as little agricultural methane as possible** (the lower end of the target ranges - 13% by 2035 and 24% by 2050). We must aim for the most ambitious climate plan, not the least. I/we want to see more agricultural climate pollution reduced and faster.
- ★ The Commission's waste advice focuses on reducing methane emissions from organics that end up in landfills. However, long-lived GHG emissions are also generated from the extraction, production, transport and consumption of packaging and goods, which is intrinsic to our current, unsustainable 'take-make-throw' linear economy. **To meet the 2050 emissions targets, the Commission should expand its advice to consider all waste streams, and build consumption-based measurements into its analysis.**

2. Do you agree we have struck a fair balance between requiring the current generation to take action, and leaving future generations to do more work to meet the 2050 target and beyond?

Our View: DISAGREE

Key Points

- ★ No. **We are a developed nation and must be doing more.**
 - For the sake of this planet and future generations, we simply cannot afford just to do the average.
 - The recommendations unfairly burden future generations.
- ★ **The cost of transitioning to a low-carbon future must fall on industries most responsible** so that policies do not regressively impact low-income communities.
- ★ **The articles of Te Tiriti should be integrated throughout the policy recommendations** instead of using the Treaty Principles.
- ★ We need to work now to ensure a safe and positive climate future that includes structurally oppressed communities.
- ★ The report needs **a greater focus on unions, a Just Transition, and building an accessible society**, including considering the co-benefits of design for and by disabled people in the built environment.

Extra info to write your own submission!

- ★ The draft emissions budgets are **inconsistent with a 1.5 degree pathway for 2030**, particularly with the role New Zealand needs to take as a highly developed nation to do more than the average (our fair share).
- ★ Our approach to transitioning equitably must take into account our role as a developed nation that has historically contributed more than our fair share of emissions, and account for the high-polluting industries that have profited from decades of pollution with little consequence. It is essential that our actions **account for our fair share** to reduce the burden on future generations and communities on the frontlines of climate impacts, who have **contributed the least to the problem but are paying the highest costs**.
- ★ Our policy approaches to equity must ensure that the cost of transitioning to a low-carbon future falls on industries and companies most-responsible rather than individual consumers so that **policies do not regressively impact low-income communities**.
- ★ Situating the bulk of reductions in the 2030s puts an **unfair burden on future generations compared to greater cuts this decade**. Bringing more government direct investment in emissions reductions forward will share the burden of reductions more equitably, while also contributing to greater consistency with 1.5 degree pathways.
- ★ We must put in the work now to create **a climate safe future that includes disabled people** in our society and way of commerce.
- ★ The report must include the positive **co-benefits of design, for and by disabled people in the built environment**. When design is led by disabled people, for accessibility, in a way that centres our rights, this benefits disabled people as well as non-disabled people.
- ★ For a **Just Transition**, greater focus on building a more **accessible society** is crucial.
- ★ Unions are not mentioned once in the CCC's advice; **there needs to be a greater focus on unions and a Just Transition**. We can deliver good, clean, living wage jobs to everybody that wants one.

3. Do you agree with the changes we have suggested to make the NDC compatible with the 1.5°C goal?

Our view: Disagree – our changes are not ambitious enough

Key Points to explain your answer

- ★ I/we support the recognition that **New Zealand's current 2030 target under the Paris Agreement is not compatible with Aotearoa making a contribution to limit warming to 1.5C.**
- ★ I/we agree that New Zealand's fair contribution is "much more than 35% below 2005 gross levels by 2030".
- ★ The Commission should publish and recommend to the Government **a 'fair share' 2030 target in our NDC** (nationally determined contribution), that reflects New Zealand's outsized carbon footprint and historic responsibility for causing climate change.
- ★ The NDC should be met primarily through domestic emissions reductions, with **offshore mitigation only being a last resort.**
- ★ **Climate finance to support communities on the frontlines of climate change** to adapt should be a key part of supplementing our NDC emissions reduction target.

Extra info to write your own submission!

- ★ **A fair share nationally determined contribution:** A 2030 NDC target under the Paris Agreement for New Zealand that reflects our historical pollution and outsized carbon footprint (our fair share) would be far beyond 35% below 2005 levels by 2030. The 2030 target range (25-44%) the Commission uses to find emissions reductions consistent with IPCC pathways for 1.5 degrees represents what Aotearoa's contribution would be if we did the average, and not our actual fair share.
- ★ The Commission should publish and recommend to the government a 'fair share' NDC using appropriate historical responsibility / capability / need calculators, that applies New Zealand's differentiated obligations under the UN Framework Convention on Climate Change and the Paris Agreement to safe 1.5 degree pathways.¹
- ★ The form of the NDC should be **primarily domestic emissions reductions** and removals through strengthened emissions budgets [detailed in Q1-2], greatly enhanced climate finance to support those on the frontlines of climate change to adapt to impacts (as a non-mitigation contribution), and not overly rely on offshore mitigation.² The opportunity costs of relying on offshore mitigation vs domestic reductions need to be communicated clearly to the public.

¹ See Oxfam New Zealand's Report 'A Fair 2030 Target for Aotearoa' (September 2020) for estimates of New Zealand's fair share of emissions reductions calculated on an all gases basis for 2030.

² For New Zealand's fair share of climate finance goals set under the Paris Agreement, see Oxfam New Zealand's briefing 'Standing With the Frontlines' (December 2020)

4. Do you agree with our approach to meet the 2050 target that prioritises growing new native forests to provide a long-term store of carbon?

Our view: AGREE

Key Points to explain your answer

- ★ I/we support the commission's focus on large reductions of carbon dioxide with as little reliance on emission removals by forestry as possible.
- ★ Our approach to forestry must consider how sovereignty will be returned to mana whenua to manage land, to uphold article 2 of Te Tiriti o Waitangi.
- ★ I/we support the significant increase in new native forests and the assumption that no further native deforestation occurs from 2025. All native habitats must be incorporated into this approach. For example, wetlands and tussock should be recognised for their role in storing carbon, and protected from destruction.
- ★ Our approach to forestry must address climate change while recognising the intersecting biodiversity crisis. I/we support the commission's recommendation to reduce reliance on exotic forestry due to the damage it causes to native habitats. I/we suggest a stronger approach to restore and manage existing native habitats to allow for a reduction in the proposed exotic afforestation.

5. What are the most urgent policy interventions needed to help meet our emissions budgets? (Select all that apply)

Our view: Tick the first three options

Key Points to explain your answer

Policy interventions are needed across the board to meet the emissions budgets, alongside policies that mitigate the effects on communities in vulnerable situations. Areas where the policy interventions outlined by the commission could be enhanced to lead to larger emissions reductions include:

Transport

- ★ An active and public transport mode shift. Currently, the recommendations for active and public transport are not ambitious enough.
- ★ Walking, cycling and public transport can and must play a much larger part in decarbonising the transport system.

- ★ Design active transport systems that work for disabled people
- ★ Greater focus on livable, compact, accessible and equitable cities.
- ★ I/we support the proposals for converting internal combustion engine vehicles to EVs as a supporting measure for situations where alternatives to private vehicle ownership are not possible.
- ★ Take into account any unintended consequences of mass EV adoption and co-create policy with those affected.
- ★ A disability responsive EV policy is essential to ensure that disabled people can participate in all modes of low carbon transportation.
- ★ Advise the Government that continuing to expand road capacity is incompatible with addressing climate change.

Energy

- ★ Much larger direct investment in energy efficiency is needed, especially as we work to make all of the housing stock accessible for disabled communities, and to enable secure life long housing options.
- ★ Energy efficient homes must be financially affordable and physically accessible.
- ★ More ambitious targets and bans on coal:
 - Replace coal use in process heat for food production, specifically for the dairy industry, with renewable energy sources (not gas) by 2027.
 - Ban new and expanded coal mines in Aotearoa, and an end date for all coal mining in Aotearoa - including coal mining for export.
 - An immediate ban on any new coal mining on conservation land.
- ★ Bring forward the phase out date for fossil fuel heating in new buildings to 2022.
- ★ Make our biggest polluters pay by immediately ending subsidies via free carbon credits.

Agriculture

- ★ A sinking cap on synthetic nitrogen fertiliser, which eliminates it by 2024
- ★ A sinking cap on imported feed which eliminates it by 2024
- ★ A prohibition on all new dairy conversions,
- ★ A maximum stocking rate limit, which is set low enough to drive a significant reduction in the national herd.
- ★ Advise that agriculture enters the Emissions Trading Scheme in 2021 and with no subsidies

Waste

- ★ Provide more detail on the interventions needed to reduce organic waste to landfill
- ★ Recommend binding reduction targets for all waste streams.
- ★ Recommend waste levy revenue is invested in community-scale solutions at the top of the waste hierarchy
- ★ Advise that measuring and increasing circularity in our economy is urgent

- ★ Advise the government to strengthen its approach to product stewardship to ensure materials are kept in circulation and product lifespans are extended.
- ★ Advise that products that cannot be effectively reused, repaired, recycled or composted should be designed out of the economy.

Health

- ★ Having minimal focus on health, and particularly on health savings from co-benefits, is a dangerous communication failure on the part of the Commission.

Equity

- ★ Indigenous peoples management of resources is crucial to equitable emissions reduction and approaches to climate action must reflect this importance.
- ★ Support Māori governance of taonga by:
 - Government to create binding best practices that require at least co-governance of land, water and air with whānau, hapū, iwi.
 - Give full effect to Te Tiriti o Waitangi by initiating a process to implement the recommendations outlined by the Matike Mai report, in coordination with whānau, hapū and iwi
- ★ While disability is mentioned in the report, this does not go far enough. The commission needs to expand on this with a disability-responsive position statement and work group recommendations, to ensure a just transition.
- ★ Gender is not mentioned in the report once; yet climate change disproportionately impacts women and people of diverse genders. It's vital that the Commission takes into account research on the gender impacts of climate change and climate action, and include this into their analysis.

Extra info to write your own submission!

Transport

- ★ **We need an active and public transport mode shift.** Car dependence and urban sprawl is one of the biggest contributors to climate change, road deaths, social exclusion and isolation. Furthermore, it entrenches socioeconomic inequalities and restricts access to opportunities.
- ★ **The Commission should be recommending a complete transformation to how New Zealanders get around; walking, cycling and public transport can and must play a much larger part in decarbonising the transport system.** To create an equitable transport system, disabled people must be engaged in this work. Additionally, it is crucial that these forms of transport are affordable to all members of Aotearoa New Zealand's population, and we support the recommendation to reduce fares for targeted groups.

- ★ **We must design active transport systems that work for disabled people, including understanding the flow on impacts in the urban environment from active transport, to ensure disability rights are upheld.** This shift also presents many co-benefits for health and wellbeing from more people using active transport, and will achieve a more holistic and just transition. We must not miss the opportunity to prioritise accessibility for disabled people, and a co-benefit of building for disability access is that it will also benefit everyone. Disabled people deserve to access, and benefit from active transport as users.
- ★ **The recommendations in the active and public transport area are not ambitious enough;** modelled walking and cycling increases are not even consistent with the current model growth rates in Auckland, or Auckland Council's targets for 2030. Much higher growth rates are possible as witnessed globally through tactical reallocation of street space during the pandemic.
- ★ **More specific actions based around creating livable, compact, accessible and equitable cities,** where infrastructure is interconnected to reduce emissions (transport, buildings, housing etc.)
- ★ I/we support the proposals for **converting internal combustion engine vehicles to EVs as a supporting measure** for situations where alternatives to private vehicle ownership are not possible. The shift to EVs must be equitable and accessible to all members of the community, and take into account disabled people's preferred method of accessible transport, and create policies that remove barriers for disabled people to access this.
- ★ We must also **take into account any unintended consequences of mass EV adoption** and **co-create policy** with those affected, including an Increased safety risk to pedestrian injury to Blind or low vision communities, from the lack of audible sound emitted from EVs.
- ★ When setting any targets for the import of internal combustion engine vehicles, we must **make sure that we are not creating more barriers for our communities,** especially disabled people, to be able to meet their access requirements. We need a disability responsive EV policy to ensure that disabled people can participate in all modes of low carbon transportation.
- ★ Making it easier to drive increases demand for driving. The commission should advise the Government that **continuing to expand road capacity (such as to reduce congestion or enable greenfield growth) is incompatible with addressing climate change.**

Energy

- ★ **Building energy efficiency:** The models presented in Chapter 12 only anticipate a 2% increase in energy intensity improvements for households through the policies recommended (changing from 4% to 6% by 2035). Much larger direct investment in energy efficiency is needed, especially as we work to make all of the housing stock accessible for disabled communities. With only 2% of accessible housing stock available, if all new builds and renovations for reasonable accommodations are both accessible and energy efficient, this could lead to much faster reductions. In commercial buildings, the models do not anticipate the scale of change that will be created by the Government policy to decarbonise the public sector by 2025 policy.
- ★ **Energy efficient homes must be financially affordable and physically accessible.** Temperature controlled environments are an accessibility issue. We have the opportunity to create 100% accessibility in how we design low carbon homes and commercial buildings. We must go beyond simply changing our methods of construction, to changing what we are constructing, to ensure we are meeting accessible standards for disabled people, and the entire population. Everybody deserves to live in a warm, dry, cheap to run, healthy and accessible home.
- ★ **More ambitious targets and bans on coal:** We need to get out of burning coal earlier than the 2037 date proposed for ending coal use in process heat for food production, specifically for the dairy industry. We recommend bringing this date forward to 2027 - and the transition must be to renewables, not gas.
- ★ The advice must include a ban on new and expanded coal mines in Aotearoa, and an end date for all coal mining in Aotearoa - including coal mining for export. There should be an immediate ban on any new coal mining on conservation land.
- ★ **Gas:** The proposed 2025 phase out date for fossil fuel heating in new buildings could be brought forward to 2022. Existing consents for 'pipes in the ground' for new developments could be compensated financially.
- ★ **Making our biggest polluters pay:** End immediately the subsidies through free carbon credits given to our biggest emitters for their pollution - the "level playing field" internationally may soon be turned on us with carbon border adjustment mechanisms, such as that being agreed in the EU. If our exporters don't have to pay a carbon price here, they may have to pay it for their exports into not just the EU, but possibly also the US and China.
- ★

Agriculture

- ★ For agriculture **we need direct regulations on the sources of climate pollution.** These should be:
 - A sinking cap on synthetic nitrogen fertiliser, which eliminates it by 2024

- A sinking cap on imported feed which eliminates it by 2024
 - A prohibition on all new dairy conversions,
 - A maximum stocking rate limit, which is set low enough to drive a significant reduction in the national herd.
- ★ The Commission has also failed to recommend that agri-business pay reparations for the vast historic and ongoing climate pollution that this industry has created. To address this inequity **the Commission should advise that agriculture enters the Emissions Trading Scheme in 2021 with no subsidies**, ie. that they enter at 100% with no free allocation.

Waste

- ★ **Multiple, urgent policy interventions are required. These should be determined by referring to the waste hierarchy and the perspective of local communities.** Aotearoa can make a just transition from a throwaway culture to a low waste, low carbon circular economy by **strengthening and resourcing local communities** to produce locally grown kai and locally made goods, and to develop innovative, brave new solutions to prevent and reduce waste. Achieving this requires comprehensive education programmes and a balance of multiple, urgent policy interventions. The **waste hierarchy, which prioritises prevention, reduction and reuse, can be used as a climate lens** that highlights what these urgent policy interventions are.
- ★ **The Commission should provide more detail on the interventions needed to reduce organic waste to landfill.** For example, mandating separate collection of organics (first emissions budget) and ban organic waste from landfill (second emissions budget) to halve food waste at source by 2030 (in line with the NZ Food Waste Champions 12.3 goal), and divert more organic waste to local and regional composting. The Commission should also recognise the preference for local communities to build soil and sequester carbon through decentralised local composting systems, rather than centralised anaerobic digestion.
- ★ **The advice should recommend binding reduction targets for all waste streams.** When we reduce waste, we reduce emissions - policy interventions are needed to reduce waste across the board. The Commission's advice focuses on methane generated by organics in landfill. Government needs to set binding waste reduction targets in the Waste Strategy and the Waste Minimisation Act for **all** waste streams, organic and inorganic. This includes single use plastics and packaging, e-waste, textile, and construction and demolition waste.
- ★ **Invest waste levy revenue in community-scale solutions at the top of the waste hierarchy:** Waste Levy revenue must be invested in systems and infrastructure that support local communities to work at the top of the waste hierarchy to prevent and reduce waste in the first place and grow the reuse economy. To ensure a just

transition, the Government needs to invest in local, community-scale solutions and SME innovators who are driving change.

- ★ **Measuring and increasing circularity in our economy is urgent:** accounting for the emissions reduction potential of a circular economy requires a greater role for the consumption-based approach to calculating emissions. Consumption-based emissions data follows the lifecycle of products and materials, exposing both embodied emissions generated offshore and the upstream emissions cost of short lived consumer goods.
- ★ **The government's approach to product stewardship must be strengthened** to ensure schemes create reuse, repair and resource recovery systems that keep materials in circulation and extend product lifespans. **Products that cannot be effectively reused, repaired, recycled or composted should be designed out of the economy.** Targeting single use disposable products and right to repair should be prioritised.

Health

- ★ **The Commission's minimal focus on health, and particularly on health savings from co-benefits, is a dangerous communications failure.** While we understand there is a lack of complete information around the full costs of climate change impacts on Aotearoa, the failure to talk about these costs (and the co-benefits of taking action including on health) has been an ongoing issue in the climate change discussion in this country. It improperly - even dangerously - skews public and media focus towards the numbers they have: the cost of action. Victoria University of Wellington has calculated that over the last decade, some of the costs of climate impacts include \$800 million from droughts and \$140 million from floods.

6. Do you think our proposed emissions budgets and path to 2035 are both ambitious and achievable considering the potential for future behaviour and technology changes in the next 15 years?

Our view: Disagree

Key Points

- ★ With existing technology **we can achieve far more ambitious emissions budgets**, stronger policy recommendations, and more stringent targets for heavy polluters, than the Commission's draft proposals.
- ★ The Commission's report currently misses the opportunity to **highlight the cost of inaction**.
- ★ Agriculture
 - The current pathway lacks ambition and should include **a far greater amount of land-use change** away from ruminant livestock farming and into native forest, horticulture and other plant-based and non-ruminant land-use.
- ★ Waste
 - **The commission's waste advice takes us in the right direction, but must be more specific, ambitious and holistic** to harness the power of reduction and reuse strategies to reduce emissions.
 - Increase organic waste reduction targets.
 - Recommend binding waste reduction targets for all waste streams.

Extra info to write your own submission!

- ★ Somewhat. I/we agree with the Commission's approach that **the proposed emissions budgets can be met with existing technologies. However, the proposed emissions budgets could be more ambitious (and still be achievable with existing technologies)** by strengthening the policy recommendations (see question 5), setting more stringent targets for our worst polluters, and utilising future technologies to strengthen the emissions budgets and steepen our emissions reductions pathway. The models also need to account for scalability, for situations such as when the business sector really gets going with energy efficiency following the public sector decarbonisation.
- ★ The proposed pathway for agriculture lacks ambition and should **include a far greater amount of land-use change away from ruminant livestock farming and into native forest, horticulture and other plant-based and non-ruminant land-uses**. Several high-value, low-emitting, plant-based food, fibre and timber industries already exist that are scientifically and economically feasible to transition towards in order to reduce the amount of land used by climate-polluting meat and dairy industries. This is the kind of achievable yet transformational change that is required, and the level of ambition we should be striving for to reduce agricultural emissions.
- ★ The Commission's report focuses on quantifying the cost of meeting the proposed emissions budgets, but **misses the opportunity to highlight the cost of inaction**, and therefore the potential savings of taking bold, ambitious action to reduce emissions early.

- ★ The Commission's advice on waste takes us in the right direction but the recommendations need to be more **specific, holistic, and ambitious, recognising that our current system is broken**. Waste is a product of a system that does not recognise our interconnectedness with other species nor the natural systems of Papatūānuku. The Commission's advice must **harness the power of reduction and reuse strategies to reduce our emissions**. The Commission's **organic waste reduction targets can aim much higher than 23% by 2030**. The Commission should also recommend that the Waste Strategy and the Waste Minimisation Act set **binding reduction targets for all waste streams**, whether organic or inorganic.

Yahooooo! You have just submitted on the Climate Change Commissions Draft Advice and hopefully it wasn't as difficult or time consuming as you expected... Found this guide useful? Share the link with your friends and whānau!

From all of us at the collective of organisations that put this together, we say well done!