

Submission to the Ministry of Environment on the Second National Determined Contribution (NDC2) to the Paris Accords

Coal Action Network Aotearoa

Introduction

Coal Action Network Aotearoa (CANA) is a group of climate justice campaigners committed to ending coal mining and burning in Aotearoa New Zealand. Formed in 2007, we recognise the mining and burning of coal as the primary threat to Earth's climate system. CANA promotes climate justice by advocating and acting for a just transition to an Aotearoa free of coal mining and use. We work with local communities threatened by new coal mines and coal projects, and with allies across the climate justice and environmental movements. We are a member of the New Zealand Climate Action Network. Our target date for coal mining and use in Aotearoa to end is 2027.

We have been involved in legal action, direct action and lobbying to achieve these goals. Our members and supporters are members of local communities with experience of the negative effects of coal mining and use, climate activists and scientists. We work with communities around the motu, other activist groups, and central and local Government to achieve our aims.

Submission

1. Do you have any comments on the Climate Change Commission's advice?

We find the Climate Change Commission's (CCC) advice on NDC2 to be comprehensive and well-reasoned. We feel that it is entirely appropriate that New Zealand attempt to fulfil its NDC obligations through domestic emissions reductions, as the CCC outlines, rather than through overseas carbon credits. The first order of business needs to be reducing domestic emissions and transforming New Zealand's economy to operate with low greenhouse gas emissions. Then, the next step should be to look at purchasing carbon credits from our Pacific Island neighbours to help them adapt to global warming and build resilience to weather disasters. Considering the dire predictions of global warming's impacts on insurance costs, human health, food security and future GDP, emissions reductions are a matter of urgency.

2. What factors should the Government prioritise when setting NDC2?

a) Represent New Zealand's highest possible ambition in light of national circumstances

This is a requirement for NDCs and needs to be **high priority**

b) Align with the Global Stocktake recommendations

This also needs to be **high priority**. The results of the stocktake show that we need to double down on our efforts to reduce greenhouse gases.

c) Align with the temperature goal of the Paris Agreement (to limit global warming to well below 2°C, and pursue efforts to limit global average temperature rise to 1.5°C)

The 1.5°C limit is perhaps aspirational at this point, but climate modelling shows that every fraction of a degree warmer our climate, the more damage and hardship it will bring. This is also a **high priority**

d) Minimise costs from meeting the target

Of course, the country should attempt to minimise the cost of transitioning to a low emissions economy, but we consider this **medium priority** because we, as a society, are relatively wealthy at the moment, but all predictions are that we won't be as wealthy in the future. We should be spending the money on transitioning our society now, while we can still afford it and are not yet suffering from the combined hardships of rebuilding after climate-fuelled disastrous weather, a falloff in export earnings due to the predicted downturn in world-wide economic activity and rising costs for food, imported goods and insurance.

e) Minimise impacts to the economy

This should also be a consideration but we consider it to be **medium priority**. There are ways to minimise the impacts of the transition but, as we've seen overseas, this is best done through government spending and regulatory mandates. Blunt and unstable instruments like the ETS have been shown to be ineffective in comparison to incentives and mandates. The ETS has been a special disappointment because there has been so much early credence put into it but yet it is now overwhelmed by cheap forestry credits and overly generous industrial allocations. It has little emissions reducing power at this point and needs serious reform.

f) Ensure there is a clear plan for delivering the target

This is low priority because it is essentially already in process through the 5-yearly Emissions Reductions Plans (ERPs) specified by the Zero Carbon Act. Unfortunately, the MfE's draft 2nd ERP, for the 5 year period just before NDC2, fails to put the country on the path to even meet our own domestic reduction targets and falls about 100 MtCO₂ short of meeting the target set in our original NDC. The latest ERPs have been clear, but too weak to set us on the path to the necessary emissions reductions.

g) Consider New Zealand's relative standing to other comparable countries/economies.

This is also **low priority**. It shouldn't matter what other countries are doing about the climate crisis. It is as if we are all standing around watching a developing house fire and waiting for someone to take action. Our future is also inside that house fire! Waiting for other countries to step to climate action is a recipe for global inaction. Taking firm and effective action now also encourages other country to take action too. We are an advanced, wealthy economy and can easily afford to take that action. Our Pacific Island neighbours, who are losing their homes to sea level rise and cyclones don't have that ability.

3. What factors in New Zealand's economic outlook should be taken into consideration when setting NDC2?

The most important consideration needs to be the disastrous outlook for the national and global economy and wellbeing if we fail to take action. Sea level rise and storm surge will inundate and damage our coastal cities, global trade for our premium exports will dry up as trade partners become less affluent, cost of living will rise, fuelled by rising insurance and food costs, creating social unrest, all the while the national bill to repair damage due to storms, floods, droughts and wildfire will increase.

4. What factors do you think are most important for deciding a "fair share" for New Zealand for its NDC2?

The most important factor in determining New Zealand's fair share of emissions reductions is what New Zealand can physically accomplish. Again, we should not wait around for the rest of the world to act. This is an emergency. We all need to do what we can.

5. Should NDC2 be set at a level that is achievable with domestic action only or should it be set at a level that is achievable with a mix of domestic action and international cooperation (offshore mitigation)

We support an ambitious NDC that can be met by domestic action, as the CCC has shown is feasible but with the option to use offshore mitigation if our efforts fall short.