



8 June 2018

S18.25

## **Submission to the New Zealand Productivity Commission on the Low-emissions Economy: Draft Report**

### **0. Introduction**

- 0.1. The National Council of Women of New Zealand, Te Kaunihera Wahine o Aotearoa (NCWNZ) welcomes the New Zealand Productivity Commission's inquiry into how New Zealand can transition to a low emissions economy, and the opportunity to make a submission.
- 0.2. NCWNZ is an umbrella group representing 245 organisations affiliated at either national level or to one of our 19 branches. In addition, about 350 people are individual members. Collectively our reach is over 350,000 with many of our membership organisations representing all genders. NCWNZ's vision is a gender equal New Zealand and research shows we will be better off socially and economically if we are gender equal. Through research, discussion and action, NCWNZ in partnership with others, seeks to realise its vision of gender equality because it is a basic human right.
- 0.3. NCWNZ has a long history of supporting reduced emissions including urging the Government to ratify and implement the Montreal Protocol, Agenda 21 and the Kyoto Protocol.<sup>1</sup>
- 0.4. Climate change is an intergenerational issue and a human rights concern, affecting a range of rights, such as the right to life, to health and to wellbeing and it believes that urgent action is required by a variety of parties. There is no shortage of signals from a wide range of stakeholders and communities that there is a need for greater and urgent action to address the causes and the effects of climate change including significant and tangible change to prevent its negative human rights impacts. Moreover, there is an obligation on government and corporations for leadership to protect people from climate change harm and other related human rights violations.
- 0.5. We advocate for "a Rights-Based Approach to climate change"<sup>2</sup>. This would support policies that address climate change to fulfil human rights. The 2015 Paris Agreement stipulates; "Parties should, when taking action to address climate change, respect, promote and consider their respective

---

<sup>1</sup> NCWNZ. 2012. 115 years of resolution. 7.13. <http://www.ncwnz.org.nz/wp-content/uploads/2013/06/115-years-Register-everything-2.pdf>

<sup>2</sup> The United Nations Human Rights Council has recognised that climate change has implications for the enjoyment of human rights. The Office of the High Commissioner for Human Rights (OHCHR) has pointed out that climate change requires global solutions, which should reinforce human rights commitments and advocates for a right-based approach to climate change

obligations on human rights...and intergenerational equity". The parties to the Paris Agreement<sup>3</sup> (including New Zealand) also acknowledge that adaptation, including capacity building for mitigation and adaptation action should be gender-responsive, participatory and fully transparent, taking into consideration vulnerable groups, communities and ecosystems.

- 0.6. In line with the United Nations Convention on the Elimination of all forms of Discrimination Against Women (CEDAW)<sup>4</sup>, NCWNZ advocates for women as powerful agents of change and their leadership is crucial.
- 0.7. All stakeholders should ensure that climate change and disaster risk reduction measures are gender responsive, sensitive to indigenous knowledge systems and respect human rights. Women's rights to participate at all levels of decision-making must be granted in climate change policies and programmes.
- 0.8. Our aim is to provide guidance to the New Zealand government on gender-related dimensions of climate change and disaster risk reduction on the measures to adopt to ensure full compliance with their obligation to respect, protect and fulfil women's rights.
- 0.9. This response to the New Zealand Productivity Commission's call for comment on the draft report has been prepared by the NCWNZ national standing committee for Climate Change and the Environment in collaboration with the membership of NCWNZ and includes membership feedback to 11 questions.

## 1. Are there specific ways in which institutions, laws, policies etc. could be amended or altered to create a lower emissions economy?

- An overarching **policy framework** is advocated for the introduction of a single integrated national Government Policy with priorities and interventions to establish appropriate institutional frameworks and guidelines to inform actions that will meet the stated objectives. The Policy must be holistic and articulate New Zealand's priority interventions on climate change across sectors, at all levels (community, state, national, and international). The Policy should inform national budgeting and government spending in relation to climate change mitigation and adaptation and in synergy with ongoing economic development and environmental and climate change initiatives. This Policy direction needs to be supported by strong and collaborative leadership to put in place a coordinated set of measures.
- Creation of a **legislative framework** for mid- and long-term emissions reduction targets, cap-and-trade, carbon labelling, carbon disclosure, and the expansion of practical innovations in technology.
- Clarification and linking of **roles, powers, duties, functions and responsibilities of stakeholders** within local and national government, the private sector, civil society, and communities.

---

<sup>2</sup> <https://unfccc.int/>

<sup>4</sup> CEDAW/C/GC/37

- The formation of an independent, transparent and advisory body (such as a Climate Change commission) is supported as a matter of urgency, to drive policy advice for transitioning and action.
- Enforceable laws are essential where the government is held to account by civil action through the courts. (In UK a reported May 2018 High Court ruling<sup>5</sup> found government's failure to require action from 45 local authorities with illegal levels of air pollution in their area to be unlawful and the judge declared, "... sincere promises are not enough....it seems court must keep the pressure on to ensure compliance is actually achieved.")
- Financial penalties for non-compliance to be enforceable and cover the cost of the mitigating and fixing the emission failure. Business should be required to report their emissions annually and be audited. A system of incentives rather than penalties should be advocated to ensure competitive behaviour and environmental benefit.
- Programmes of action, budgets and strategies need to be coordinated across sectors such as trade, development, energy, environment, water, climate science, agriculture, education, health, planning, and at different levels of governance including local, national, regional and international. This would ensure an effective and human rights-based approach to disaster risk reduction and climate change.
- Consideration of a **rights-based Approach to climate change** is called for, ensuring policies that address climate change will fulfil human rights.
- NCWNZ calls for transformational response to climate change mitigation. Such an undertaking will need to secure civic input and support in order to maximize the diversity of, and buy-in for, multiple pathways of change towards a climate compatible future. We strongly believe that **voluntary engagement by individuals, society and households** in carbon-reducing behaviours might be significantly enhanced if climate change were to be framed clearly, and unequivocally as a wellbeing and a moral issue.
- **Women** are powerful agents of change and their leadership is crucial. All stakeholders should ensure that climate change and disaster risk reduction measures are gender responsive, sensitive to indigenous knowledge systems and respect human rights. Women's rights to participate at all levels of decision-making must be granted in climate change policies, legislative frameworks and programmes.

## 2. What mechanisms do you see as critical for bold action, in transitioning transformation to a low-emissions economy?

- Our members consider that the correct price on carbon, with an effective ETS is important. It is imperative that it is not financially viable to emit.

---

<sup>5</sup> <https://www.express.co.uk/news/uk/954022/air-pollution-uk-cities-deadly-risk-world-health-organisation-international-limits>

- Members feel that government needs to take a lead in appropriate areas such as land use change and vehicle choice in NZ. Government support in leading this change should include putting in place the opportunity of viable alternatives. Targets should be established that are measurable with specific time frames in order to understand the effectiveness of action and change.

### **3. How could New Zealand signal a commitment to a widespread transition away from fossil-fuel vehicles? For example, should New Zealand explicitly aim to phase out the importing of fossil-fuel vehicles by some specified future date?**

- There is strong support from NCWNZ for widespread transitioning away from fossil fuel vehicles to electric vehicles (EVs). A date to phase out the import of fossil fuel vehicles is supported and steps should be taken now to prepare for implementation. These include:
  1. Assurance of access to adequate and affordable supply of non-fossil fuel sourced energy to power EVs
  2. Provision of a comprehensive recharging network nationwide
  3. Support for local domestic recharging stations in areas where dwelling units do not have vehicle access to electricity supply
  4. Assurance of adequate and affordable supply of non-fossil fuelled vehicles on the market to replace fossil fuel vehicles
  5. Subsidies for electric vehicles and/or tax on fossil fuel vehicles to ensure the purchase of EVs is competitive/affordable in the marketplace
  6. All government departments purchase EV fleets that can be released over time to support the second-hand EV market, so that New Zealanders have the opportunity to purchase second hand EVs that are more affordable.
- There is member support for urgent signalling to phase in vehicle emissions standards in New Zealand, initially to control all vehicle imports ahead of phasing in standards for the existing national vehicle fleet; such standards must be enforceable.
- There is support from a member for measures to reduce individual vehicle ownership by supporting increased provision for affordable public transport including rail; and including the provision of more extensive and safer cycling and walking infrastructure that not only reduces carbon emissions but also builds healthier and happier communities. Women, children and the elderly in particular benefit from these multi-sectoral outcomes.
- There is support for the Report's recommendation to focus the GPS on Transport on vehicle externalities and land transport funding to deliver multiple cross sectoral efficiencies including low emission targets for transport. This will contribute to the redress of present costs carried by our environment, community wellbeing and women and children.

- Government procurement measures for public transport providers should include rapid phase-in of low emission service delivery outcomes.
- The commercial road user sector requires signalling from the government of the transitioning out of fossil fuel powered freight vehicles in favour of movement of goods and services to EVs and to a significantly improved national rail network. This will support carbon emission reduction, will reduce the number of heavy vehicles on our roads, the increasing road accident statistics toll on the wellbeing of families including women and children and our wider economy.
- Breathing clean air is a basic human right, that government and councils should ensure meets the WHO standards. Of the live NZ air quality feeds online some do not tell a healthy story<sup>6</sup>. Factors including temperature, weather and time of day appear to contribute to air quality variance each day. Of those New Zealand locations that are monitored, a few including Geraldine and Rangiora display variable air quality that at times is considered unhealthy. In the view of NCWNZ there is scope for additional urban sites including city centres, to be monitored. Transparency around carbon emission levels and hence air quality is essential, so that the public can be empowered to hold governments and corporations accountable.

**4. What is your view on government funding being refocused on science, research and development and that a national innovation system be established to support economic transformation and restructuring?**

- The majority of members agree that funding for research is very important. Research was deemed to be valuable in areas such as mechanisms and progress towards a low carbon economy, biology of vulnerable and threatened species, and the impacts of tourism. Overseas research is not always applicable to New Zealand or may need to be verified for local conditions.
- A minority of members did not agree with refocusing funding into science research and the reasons for this included: it was seen as a route to develop another layer of bureaucracy, and there are more pressing needs for funding in areas such as housing, health and education.

**5. In determining land use changes for a low carbon future, how important is it to establish and to monitor an integrated approach, so that the effects of change on our life-giving natural resources such as water quality, biological systems and outstanding natural landscapes do not suffer from the unintended consequences of action?**

- NCWNZ acknowledges that significant change will occur across many sectors to achieve a low carbon future. In the process, it is very important to undertake careful research and planning to ensure that potential consequences of actions are understood and addressed. This requires the

---

<sup>6</sup> <http://aqicn.org/city/new-zealand/canterbury/waimate-kennedy/>

establishment of processes for collaboration amongst government departments to break down silos, to understand the science and to address an integrated approach to change and the consequent outcomes.

- One member commented for the need for balance between biological, environmental and financial outcomes.
- Another member commented that while the reduction in dairying is supported, the transitioning from sheep and beef farming to forestry must be undertaken with care to ensure new planting is appropriate. Across New Zealand, including the McKenzie Basin, planting for forestry has caused wilding weed species to spread across countryside. Species should be selected on the basis that they would provide an economic return while not self-seeding as a weed species.

**6. How important is it for government to introduce a nationally (and internationally where possible) consistent, evidence based data system to integrate silos, for modelling and for comparative purposes, so that change can be measured comprehensively to inform further policy?**

- A gap in the Commission's Report appears to be the lack of information around effective tools to ensure an integrated approach to decision-making.
- NCWNZ submits that all government and local body jurisdictions need to have a nationally consistent, evidence-based data system to enable the integration of silos for modelling and comparative purposes. In particular, the environment is complex and multi-faceted and elements should not be treated in isolation of the whole.
- Where possible such data systems need to be comparable with international comparisons.
- One member highlighted the importance of geo-spatial, evidence based data systems to inform multi layering and modelling and moving beyond analogue systems into Big Data.<sup>7</sup> This may provide the tool to deepen understanding of change leading to new answers.

**7. Should government departments and councils recommending policy on carbon emission reduction be required, to evaluate and report on cross sector approaches and effects, in particular in relation to effects on social, environmental and to gender equality issues? Please explain your view.**

- Members agreed with this proposal that Local Territorial Authorities, as part of developing policy on carbon emission reduction, take into account the wider implications of these policies and the downstream effects on social cohesiveness and gender impacts as well as the environmental costs and benefits.

---

<sup>7</sup> <https://www.tandfonline.com/doi/full/10.1080/20964471.2017.1397411#.Wtk8>

- There are four pillars of sustainability-environmental, social and economic and cultural, and reporting on these factors to ensure there is no unintended downstream repercussions of policy should be required. Without the environment, we cannot have society or economy but it is very hard to justify that to a family that is struggling to make ends meet. Therefore, cross sector approaches are extremely important. Re- framing the issues through a human rights and gender equality lens is an approach that will bring buy in to lead change. This would support the implementation in New Zealand of United Nations agreements.

## **8. Should government take leadership in requiring urban design of public spaces and building performance to meet a whole of life approach, as is required in many first world cities for healthier, safer lower carbon environments? If so how?**

- The growth of population in our cities is rapid as more and more move into urbanised areas, that are known for their heavier carbon footprint.
- NCWNZ submits that both central and local governments should take a lead in providing a framework for innovation and training for councils so that they are aware of options available for creating lower carbon environments. This would include reframing of climate change issues to include a human rights and gender equality lens to highlight the significant role of women as agents of change.
- Urban design and review of building codes will do much to achieve low carbon environments, together with tree planting, solar panels on homes, cycle tracks and each access to public transport.
- Another member submitted that wherever new housing is built that tools provided by an organisation such as the New Zealand Green Building Council should be mandatory to evaluate carbon emissions not only in construction of buildings but also in the operations of buildings so that a whole of life cost approach is calculated. Such an approach reduces externality costs and ensures that operational costs are reduced thereby creating more affordable living conditions.
- The use of construction material that has a low carbon footprint is supported, including Cross Laminated timber, (replacing steel and concrete) with the cross sectoral benefit of supporting the New Zealand forestry industry and employment that adds value in NZ. There should be government subsidy to support the uptake of the use of NZ timber materials in construction.
- One member submitted that the WHO checklist of Essential Features of Age-friendly cities should be considered.
- In 2016, the New Urban Agenda adopted at UN Habitat III<sup>8</sup> recognized the need for gender-responsive measures to ensure that urban development is sustainable, resilient and contributes to mitigation of and adaptation to climate change.

---

<sup>8</sup> <https://unhabitat.org/new-urban-agenda-adopted-at-habitat-iii/>



**9. Would a higher effective emissions price be sufficient to encourage greater use of lower carbon cements? Would doing so require more active government policy (such as procurement standards and targets)? Should the use of timber alternatives be incentivized?**

- Higher emission prices should include incremental rises for all the changes required – especially if signalled well ahead to provide for business planning. But we need a low carbon building industry – including prefabricated quality types of all sorts of buildings for residential and the other uses. The use of low carbon concrete and sustainable timber in buildings should be mandated. The cross laminated timber industry off shore demonstrates its viability. This industry in its infancy in New Zealand should be subsidised and will also support our growing forestry and export sectors.
- The Government and local bodies need to be active in the implementation of current laws. This will lead to the development of standards and targets. Some members believe that a better way is to provide incentives for the development of alternatives such as recycling single use plastic. Timber, plastic and the use of recycled or renewable resources needs to be incentivised. E.g. reuse of vehicle tyres.
- The right mix of technologies, investments and processes that will make a real difference needs to be identified. In order to do so, one must bear in mind what has worked in the past and where each sector is today.

**10. Should central, local and district government provide leadership for mitigation measures including regulation, against the effects of climate change, sea level rise and extreme weather events, upon both public and private realm assets? Please give reasons for your response – how, why?**

- Members considered that government at all levels, national and local territorial authorities, are the institutions that provide leadership. A strong emphasis on collaborative thinking is needed so that there is uniformity of approach to action and regulation. Common rules and regulations are required for areas that are of high risk from sea level rise and extreme weather events. Many people are still of the mind-set that “it won’t happen to me”. However, supported with education, measures need to be put in place to protect both private and public assets, particularly new builds and to mitigate damage to existing infrastructure. A coastal setback line within which no construction can take place is one measure that would be useful. Local governments need to plan now, to protect their most at risk areas.
- Change only occurs with the cooperation of civil society and government. Governments have to involve civil society in planning for climate change mitigation and then actively enforce and monitor current emission and environment laws. There is no point in having laws that reflect the will of civil society that are then not implemented, monitored and enforced by government.



Business needs/wants should not be the priority if there is conflict with the wider low carbon agenda.

## 11. What are the mechanisms that can be put in place to support a role for civil society, in supporting a wide-spread transition to a carbon-free existence to bring everyone on the journey of change?

- Our members stress the need for widespread education across society to increase the understanding of each individual's impact on greenhouse gas emissions. Education and information can change attitude and effect action (c.f. anti-smoking campaigns). Framing climate change as a significant human rights issue that under times of adversity affects everyone and in particular women and children more, is a key part of the journey of change.
- Findings of CEDAW highlight that, "Education improves the capacity of women to participate within their households, families, communities and businesses, to identify means to reduce disaster risks, mitigate climate change, develop more effective recovery strategies and, thus, build more resilient communities. Education also increases access to opportunities, resources, technologies and information that aid in disaster risk reduction and the development of effective climate change policies. The prevention and mitigation of disasters and climate change require well-trained women and men in multiple disciplines including economics, agriculture, water resources management, climatology, engineering, law, telecommunications and emergency services"<sup>9</sup>.
- Some members encourage government actions such as tax breaks for small business, and incentives for larger businesses to lead with life cycle sustainability goals and cradle-to-cradle initiatives. This requires awareness and education.
- Members advocate the significant strengths of civil society and of women in particular, as key agents of change in addressing the challenges climate change.
- It is education and the reframing of key issues of climate change as being a significant threat to human rights and to gender equality, that will catalyse this opportunity.

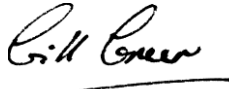
## 12. Conclusion

- 12.1. In summary, there have been a lot of reports and talk in recent years – Action now, is imperative to ensure a smooth and rapid transition to a low emission economy. Findings of the Commission should be translated into bold action and targets that bring all New Zealanders actively on the journey to a low emission future that will serve present and future generations.

---

<sup>9</sup> CEDAW/C/GC/37

- 12.2. We would welcome the opportunity to meet in person with the Productivity Commission to discuss the content of this submission, why climate change is a human rights issue, and the Low Emissions Economy draft. Please do not hesitate to contact us.



Gill Greer  
Chief Executive



Christine Caughey  
Convenor,  
Climate Change & Environment Standing Committee