Submission on the MfE Emissions Reduction Plan discussion document

By: Waipā District Council
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Introduction

Waipā is a landlocked territorial district in the Waikato Region, south of Hamilton. It has a population of approximately 57,000 principally in the towns of Cambridge and Te Awamutu, but with a significant rural population. Waipā is a high-growth district with strong commuter links with Hamilton. Reticulated drinking water is sourced mainly from the Waikato River; most rural properties rely on rainfall capture for drinking water. Dairy farming is the largest sector of the Waipā economy, contributing $267million in 2020, equating to 9.2% of the district's economy.

Although not directly affected by coastal issues arising from climate change, Waipā can expect to be environmentally, socially and economically challenged by the effects of climate change. It is Waipā District Council's responsibility to manage its services and assets in ways that help individuals and communities adapt to meet these challenges.

In developing its 2021-2031 Long Term Plan (LTP), the Council engaged with its communities to develop a new vision to *Build Connected Communities.* Pertinent to the climate change challenges faced by Council, our Community Outcomes are to be:

- be environmental champions,
- be socially resilient,
- be economically progressive.

Among our external strategic priorities, our focus is to:

- effectively plan and provide for growing communities, and
- prepare for climate change.

The principal community concerns for the environment, as expressed to Council, are:

- being prepared for, and responsive to, climate change,
- the promotion of sustainable living, and
- a desire to improve waste recycling and waste minimisation.

Council's responses in this submission are confined to questions where it feels it can provide constructive input. They include input from senior managers, staff, Council's Executive and have been discussed with Elected Members to reflect Council's approach to this subject.

General remarks

In general Council supports the approach of the Ministry in its proposals for the first Emissions Reduction Plan. However, Council urges the Ministry, and the whole of central government, to be bolder and more ambitious. Meeting the emissions budgets to 2035 recommended by the Climate Change Commission is essential, for if these are not met, the global circumstances in the early 2030s may be such that even more ambitious reductions will be required by a date earlier than 2050 if global temperature increases are to be confined within 1.5^{o}C above pre-industrial levels. In these circumstances, larger and swifter emissions reductions would increase the risk of unfair, inequitable and exclusive transition pathways occurring as more disadvantaged households and sectors might not have the capacity to make rapid adjustments to their lifestyles or technologies in order to reduce their emissions quickly enough.

It is Council's view that the expectations of territorial authorities are not clear across any of the sectors in the discussion document. Councils are expected to take leading roles in progressing the transition pathways in their communities, but this will be difficult if there are no targets to be achieved and standardised methodologies for assessing, and reporting on, emissions reductions and other indicators.

In addition to the costs to Council of helping to drive the transition pathways, there are likely to be further financial pressures from increasing fossil fuel costs while Council undertakes the transition of its own facilities, assets and organisation.

In general Council also supports the submission of Local Government New Zealand (LGNZ) which has made several points of submission on behalf of all local authorities. The submission of this Council provides additional commentary from the Waipā perspective, and where there is any discrepancy from the LGNZ submission, the Waipā perspective should be given precedence as it reflects the local Waipā community view rather than LGNZ's broader view.

Similarly, Council generally supports the submission of Taituarā, the local government professionals' organisation; again where there is any divergence of views, Council's own commentary reflects the local, rather than a collective, national opinion.

Commentary on specific questions

1. **Do you agree that the emissions reduction plan should be guided by a set of principles? If so, are the five principles set out above the correct ones? Please explain why or why not.**

Council agrees with the five guiding principles but would like to see the following points included:

- A recognition of the multi-ethnic and multi-cultural communities in New Zealand that will be affected by climate change and who need to be included in a fair, equitable and inclusive transition; specifically Pacific Island communities should be acknowledged as New Zealand may be a major destination for many as island nations become increasingly impacted by sea level rises.

- Reference to the Precautionary Principle of taking action in advance of evidence of harm. Whereas the principles refer to "an evidence-based approach", without the addition of the Precautionary Principle, this can be a barrier to action, or an excuse for delaying action. This has been used as a reason for taking no action on climate change issues by many people for many years. There should a balance between the need for evidence and a need for action.

Council also comments that there needs to include a principle of ensuring "joined up government directions". Councils are currently being bombarded by a plethora of government directions many of which are potentially misaligned or inconsistent (e.g. NPS for Urban Development vs NPS for Highly Productive Land vs Emissions Reduction Plan). Council suggests there needs to be an arm of government (eg. DPM or DIA) looking across all government initiatives to ensure they are all joined up and consistent in their outcomes.

4. How can the emissions reduction plan promote nature-based solutions that are good for both climate and biodiversity?

The discussion document appears to have no definition of "nature-based solutions" other than the example of regenerating native bush. Based on the premise that this is the definition intended, Council has the potential to make a considerable contribution in terms of nature-based solutions.

The Significant Natural Area (SNA) programme, Environmental Benefit Lots (EBLs) and reserve extensions/acquisitions all have potential to sequester considerable carbon especially where EBLs in Waipā are used to encourage rural tree planting. Carbon sequestration could be assessed easily using current technologies and methodologies.

Council contributes to the management of the nationally important peat lakes, several of which are located within Waipā district. The peat lake water levels are maintained artificially by weirs because surrounding peat areas are drained. As peat dries and oxidises, carbon is lost as emissions, including as methane. There may be opportunity to manage nature and carbon emissions from peat simultaneously.

Native forests as permanent carbon sinks may be a more sustainable alternative to plantation forestry on steeper properties. The lower initial rates of carbon sequestration by native forests (relative to plantation forests) are offset by there being no compounded costs such as pruning; there are reduced emissions and environmental impacts at harvest, and

provide a longer term commitment to carbon sequestration than plantation forests. The international scientific community is now strongly recommending against plantation forestry as a solution to climate change, and in favour of win-win approaches (nature-based forestry, for example) that tackle the issues of jobs and thriving communities, healthy waterways, biodiversity and climate all at once.

In New Zealand, regenerating and restoring native forests represents a huge opportunity for sequestering carbon, while creating jobs, restoring biodiversity, and protecting soils and waterways at home (compared to overseas forestry investments).

More carbon is stored in soil than living biomass. This is important in an agriculturally-rich district such as Waipā with its highly productive soils. These need to be adequately protected for their benefits in carbon sequestration, food production and security, and economic prosperity. There needs to be a balance between land use favouring pasture (and high soil carbon storage) on productive land, and land use favouring native forest replanting and regeneration (with high carbon storage, biodiversity and land drainage benefits etc) on more marginal land.

Council is also concerned at the potential loss of urban trees as a result of increasing urban density under the NPSUD. Urban trees contribute to carbon sequestration as well as urban shading and community wellbeing.

5. Are there any other views you wish to share in relation to the Transition Pathway?

Council acknowledges that it will have a role in transitioning to a decarbonised economy. Council provides many services for its communities that will be impacted by changes to the way they are delivered in a changing environment and in a decarbonised economy; by changes to the levels of service that can reasonably be expected; by the increasing costs of designing and maintaining infrastructure; by changes to urban design and community living in ways that will achieve sustainable social, cultural, environmental and economic wellbeing.

However, in Council's opinion, an equitable transition is vital. Even in a comparatively wealthy district such as Waipā, there are communities that are socio-economically disadvantaged and which risk being left behind if transitional services are financed on a user-pays basis, or by local authority rates. Alternative funding mechanisms need to be introduced early so that disadvantaged communities can receive the benefits of early transitions instead of having to "catch up" with their more affluent neighbours. However, although Waipā is a high-growth district, the high cost of housing can mean that even asset-rich households have little disposable income for transitioning to a low emissions lifestyle.

Council requests that the document should also reference benefits to the environment other than biodiversity: there will also be benefits for environmental quality such as water and air, and thus return New Zealand to being "clean and green".

It has been commented before that New Zealand society will look very different in 2050 with major transition required across many sectors. It is therefore essential to consider all sectors when envisaging how that new society might look and function. For example, while not strictly relevant to emissions reduction, the use of technology in production systems (eg. the use of genetically modified crops) may need to be reviewed as necessary for achieving economic and food security outcomes in a decarbonised society.

The public health information campaign on COVID-19 with continual advertising, announcements and literature shows that such interventions can be effective. If the transition pathway to a low emissions economy is to be successful in achieving emissions reduction targets, similar campaigns need to be devised, targeted and utilised; there needs to be a high level of understanding of why we are doing these transitions, what is proposed in terms of new technologies, what steps (small and large) everyone can do to reduce their emissions etc. Failure to do this risks creating an information void; this will make it harder and slower to achieve the required emissions reductions.

6. Which actions to reduce emissions can also best improve our ability to adapt to the effects of climate change?

Council considers the following actions to be the most relevant for Waipā's communities at this stage (recognising that these are likely to change over time):

- changes to transportation modes, networks and corridors will be important; however, there is a risk of increasing embedded carbon in developing alternatives or in making adaptations (eg. in developing light rail alternatives).

- building and construction changes will have an impact on individual climate resilience and wellbeing through better quality home and working environments; however, this also comes with a risk of increasing embedded carbon, and requires changes to the Waste Strategy [also currently receiving submissions] to promote and enable much greater reuse and recycling of building waste rather than disposing it into landfill sites. Council is making a submission on the Waste Strategy.

- Amendments to the NPSUD have the potential to increase emissions from demolition waste as single dwellings are removed in favour of up to three three-storey dwellings in addition to the increased embedded carbon in those new buildings.

7. Which actions to reduce emissions could increase future risks and impacts of climate change, and therefore need to be avoided?

Waipā, and the wider lower Waikato, is an agriculturally-rich area. Changes to agriculture should not include or encourage further drainage of peat land as this causes the peat to dry and release carbon as methane, which is a major source of New Zealand carbon emissions.

Urban residential intensification has the potential to reduce some emissions (eg. from transportation), but increase emissions from demolition waste (ie. removal of one dwelling) and embedded carbon from constructing up to three three-storey replacements.

Equitable transitions strategy

13. Do you agree with the objectives for an Equitable Transitions Strategy as set out by the Climate Change Commission? What additional objectives should be included?

Council believes this is an opportunity to develop an economy in which there is full employment. Not only will some workers need new skills, but there is opportunity to upskill those who are currently outside the skill set for today's employment market. Bringing more people into employment will help achieve a fair, equitable and inclusive transition.

Council also believes that ambitious action is required. For the transition to be fair, equitable and inclusive, the pace of transition needs to accommodate those least able to make rapid change. Therefore there is a risk that progress to reducing emissions is slow. There needs to be ambition to help the "slow lane" transition quickly otherwise New Zealand will miss its emission reduction targets, or the transition will be neither fair nor equitable. This needs to commence immediately otherwise the disadvantaged sectors of the community will be constantly having to "catch up" with their more affluent and "tech-savvy" neighbours; experience tells us that such a gap will continue to widen and reduce the equity and inclusiveness of any transition. To quote Abraham Lincoln, this needs to be a transition "of the people, by the people, for the people."

14. What additional measures are needed to give effect to the objectives noted by the Climate Change Commission, and any other objectives that you think should be included in an Equitable Transitions Strategy?

In Council's view, there needs to be a good communications strategy that targets everyone, and particularly those communities that are less willing or able to transition; that promotes good understanding of the need for change; that can be aspirational about how society might change. People's thinking is naturally constrained by what they know and many people cannot envisage alternative technologies, ways of living etc. To enable people to transition and to respond to the challenges and be entrepreneurial, everyone needs to be able see and understand the big picture (see also Council's response to question 5 above). A series of campaigns over a sustained period of time (although not continuously otherwise their effectiveness is reduced) will certainly benefit local government in working across its communities to assist transition and resilience.

Funding and financing

24. What are the main barriers or gaps that affect the flow of private capital into low-emissions investment in Aotearoa?

Council wishes to remind central government that as implementation agencies, territorial authorities have limited revenue streams. These would benefit from central government tax incentives that encourage private investment in low emissions technology and infrastructure, and also by government utilising a range of options to share revenue with local authorities.

Emissions pricing

32. Are there any other views you wish to share in relation to emissions pricing?

In Council's view, the Emissions Trading Scheme (ETS) needs to be expanded to allow other sources of emissions savings to be claimed. For instance, wastewater treatment plants using new technology can reduce methane emissions by approximately 88% and these emissions make up a significant proportion of local authorities' carbon profiles: for Waipā, it is close to 40% of Council's total emissions. If local authorities could claim ETS credits for emissions saved through investing in new technology for wastewater treatment plants, there would be a clear win-win for both the climate and water quality/environmental outcomes.

Council would like to see other schemes that could create large-scale emissions reductions accommodated within the ETS as well, as this creates a strong incentive for both investors and users (or savers of emissions).

Planning

33. In addition to resource management reform, what changes should we prioritise to ensure our planning system enables emissions reductions across sectors? This could include partnerships, emissions impact quantification for planning decisions, improving data and evidence, expectations for crown entities, enabling local government to make decisions to reduce emissions.

Council supports the proposal for emissions impact assessments for consent applications. These assessments must include full material lifecycle and embodied emissions (e.g. for construction projects), not just the impact of the activity itself. This proposal will only be successful if there is clear and joined-up national direction (eg. through National Policy Statements and National Environmental Standards) to provide benchmarking and guidance for planners or anyone else undertaking the assessments with a consistent scope and methodology.

Government needs to provide councils with much greater clarity in regards to assessing the emissions impacts of resource consents, and the impact of demolishing one dwelling and replacing it with up to three others. This clarity needs to be more definite than requiring councils to "have regard to" emissions impacts, otherwise implementation will be inconsistent and not achieve the anticipated results.

It would be helpful to Local Government to have good evidence based tools to be able to compare the carbon emissions from various configurations for urban/commercial areas of different densities along with their embedded carbon. Such tools would guide planning decisions to ensure the optimal urban form in relation to reducing climate impacts.

34. What more do we need to do to promote urban intensification, support low-emissions land uses and concentrate intensification around public transport and walkable neighbourhoods?

Council comments that central government needs to increase the revenue avenues open to councils to support and fast-track transport infrastructure. There also needs to be support for, or development of, standardised house designs that can be fast tracked through consent processes.
It should also be commented that urban intensification does not necessarily mean lower carbon emissions. Whereas it can lower transport emissions in the medium term (because this will lower anyway with an increasing decarbonised national vehicle fleet), urban intensification can lead to increased urban heating and greater demand for air conditioning. Urban intensification also leads to the loss of the shade-producing garden trees which help to combat urban heating as well promoting biodiversity and mental wellbeing.

35. Are there any other views you wish to share in relation to planning?

In Council's view, it is essential to coordinate the Emissions Reduction Plan with the other national directions (eg. NPSUD and NPSHPL), with the ERP setting the priority outcomes for the other directives. There needs to be a joined up, all-of-government approach to all national and planning directions which also includes councils and relevant sector representatives.

Behaviour change

42. What information, tools or forums would encourage you to take greater action on climate change?

Education and information to promote behaviour change will be key to actually attain a in New Zealand culture rather than just an increase in knowledge. Where emissions are linked to very socially popular trends like fast fashion and consumeristic lifestyles, the work

required to change the culture needs to be acknowledged to require a long term programme.

Establishing a nominated, and adequately financed, lead agency to drive culture and behaviour change is seen as a beneficial idea, and could potentially be extended to other government departments to assist with other initiatives (eg. in waste management).

43. What messages and/or sources of information would you trust to inform you on the need and benefits of reducing your individual and/or your businesses emissions?

Most people trust people they actually know to be inspired or to copy them and make real changes. That means a diverse specialist, scientific, engagement and behaviour change workforce, so diversity is a key asset.

Face to face learning is also a trigger for ongoing behaviour change. So for example people are more likely to start worm farming after attending a course with a local educator than watching a video on line.

Moving Aotearoa to a circular economy

49. What do you see as the main barriers to taking a circular approach, or expanding the bioeconomy in Aotearoa?

In Council's view it would be helpful to have policy settings that bring product packaging into line with what is readily recycled by the majority of councils in New Zealand. This would enable a greater proportion of waste to be recycled rather than committed to landfill.

51. Are there any other views you wish to share in relation to a circular economy and/or bioeconomy?

The current linear economy of take (from the natural environment) – make (often a single use item) – dispose (in a big hole in the ground) is not sustainable and creates a large waste burden. Waipā District Council support the circular economy approach as a key element of that is re-design and engaging the producers, manufacturers and retailers more in responsibility of the end of life of their products or packaging, where the current system leaves Councils and ratepayers trying to resolve problematic items that end up as waste.

For a circular economy to work, there needs to be equitable access to Government supported diversion infrastructure. For example currently Auckland builders can send skips to Green Gorilla which offers great diversion services and has been the recipient of several Waste Fund grants via MfE. In the Waikato we have no such access for Construction and

Demolition diversion. And transporting waste for diversion is still cost prohibitive. So please consider equitable access for all regions when developing infrastructure to support the circular economy.

Transport

52. Do you support the target to reduce vehicle kilometres travelled by cars and light vehicles by 20 per cent by 2035 through providing better travel options, particularly in our largest cities, and associated actions?

Council supports this target although conscious of the potentially inequitable impact on Waipā's rural communities which are crucial to the district economy.

53. Do you support the target to make 30 per cent of the light vehicle fleet zero-emissions vehicles by 2035, and the associated actions?

Council supports this target although the impact on farm businesses needs to be considered.

54. Do you support the target to reduce emissions from freight transport by 25 per cent by 2035, and the associated actions?

Council supports this target, although alternatives will be required to reach into Waipā's furthest rural areas.

55. Do you support the target to reduce the emissions intensity of transport fuel by 15 per cent by 2035, and the associated actions?

Council supports this target.

56. The Climate Change Commission has recommended setting a time limit on light vehicles with internal combustion engines entering, being manufactured, or assembled in Aotearoa as early as 2030. Do you support this change, and if so, when and how do you think it should take effect?

Council supports this target. However, there needs to be emissions-free alternatives that are affordable by everyone across all urban and rural communities so that the transition remains equitable.

57. Are there any other views you wish to share in relation to transport?

While Council supports all of the above targets, this support is qualified by a requirement for the government to review and introduce enabling legislation and funding that is fit for achieving these outcomes. Such a review is required at an early stage in order to embed these proposals and the subsequent emissions reductions. At the moment the Local Government Act 1974 retains the current road transport legislation and traffic regulation,

and this is all focused in favour of the private motor vehicle. The Speed Management Rule change has stalled in government, as has the Accessible Streets Regulation. Both of these need to be progressed and introduced quickly. There is also a lack of funding for passenger transport development which is holding back regional and local authorities from making significant changes to achieve the required passenger transport and emissions outcomes.

Council is reliant upon revenue from fuel levies for funding transport infrastructure maintenance, and is concerned that a reduction in revenue resulting from a reduction in fossil fuel use will have a negative impact on Council's ability to meet its levels of service as agreed with its urban and rural communities.

Council notes that most of the transportation targets are concerned with light vehicles. Waipā is a district with a large rural area and a significant rural economy. Therefore Council is concerned at the relative lack of consideration for farm and heavy vehicles. Electric vehicles require a significant growth in supporting infrastructure (charge stations, for example); however, without research and advances in technology for farm and heavy vehicles, and subsequent incentives from government for businesses to adopt these technologies, there is a risk that rural businesses will be faced with an inequitable transition. There is a risk of urban populations transitioning to EVs and rural businesses being unable to do so due to a significant vacuum in technology which has not taken sufficient account of the realities of farm operations. How can the government incentivise research and development to reduce this technology vacuum?

Council supports mandatory product stewardship for batteries to be in place to support the planned increased use of electric vehicles and solar power. Council endorses the scheme design to follow the waste hierarchy and focus on re-design, refurbishment, and reuse first, before responsible recycling and then disposal of residual waste.

Council looks forward to working with central government to unlock the potential reductions in carbon emissions.

Building and construction

70. The Commission recommended the Government improve the energy efficiency of buildings by introducing mandatory participation in energy performance programmes for existing commercial and public buildings. What are your views on this?

This question raises more questions for Council:

- How this will be enforced: by Building Control Authorities, or territorial authorities, or MBIE, or Worksafe NZ, or someone else?
- Will this copy the same framework as for earthquake-prone buildings?
- What level of council resourcing will be required?

- Will the mandate require building owners to upgrade the existing building stock if energy performance is found to be below average, or below a required standard? A cost/benefit analysis for the owners of the existing building stock may result in a significant decrease in the property value.
- Will the full cost of upgrading existing buildings to the required energy efficiency standards have to be met by the building owners? Or will there be government grant available, or other financial assistance?
- What would be the proposed timescale for ensuring existing buildings are upgraded to meet the standard?

In the United Kingdom, the high cost of upgrading existing buildings as a result of major changes to building regulations was often higher than the building was worth.

It is Council's view that such a programme would require a lot of sector and community education.

71. What could the Government do to help the building and construction sector reduce emissions from other sectors, such as energy, industry, transport and waste?

In Council's view there should be collaboration with the Construction Accord Working Groups, led by MBIE, to introduce new legislation to achieve these reductions. As in the waste sector, incentives may be needed to ensure that the cheapest option is also the most energy efficient option.

73. The Government is developing options for reducing fossil fuel use in industry, as outlined in the Energy and industry section. What are your views on the best way to address the use of fossil fuels (for example, coal, fossil gas and LPG) in boilers used for space and water heating in commercial buildings?

Council suggests that unless the removal of fossil fuels in boilers is compulsory, there will be no compliance. Therefore, there will need to be new legislation to require the removal of existing boilers and encourage building design that require no- or low-emission energy alternatives.

74. Do you believe that the Government's policies and proposed actions to reduce building-related emissions will adversely affect any particular people or groups? If so, what actions or policies could help reduce any adverse impacts?

This will have same effect on building owners as in Council's response to question 70 (above). Ratepayers and taxpayers will also be affected where the costs of reducing emissions are borne by local authorities or government departments.

Council asks for further details of any financing schemes such as a contestable fund, or subsidies. The costs of upgrading existing buildings will be very high, so one option is to apply the policies to new buildings only and allow the existing building stock to complete its

lifecycle. However, this is unlikely to achieve sufficient reduction in emissions from buildings.

In the United Kingdom upgrading energy sources to use solar panels is subsidised 100 percent; could a similar scheme be implemented in New Zealand. There are currently no incentives to use new technology especially as the costs in New Zealand are too high in comparison to other countries.

76. Do you support the proposed behaviour change activity focusing on two key groups: consumers and industry (including building product producers and building sector tradespeople)? What should the Government take into account when seeking to raise awareness of low-emissions buildings in these groups?

In Council's opinion, there needs to be highly skilled workforce with increased education and training with cost incentives to encourage opportunities to be pursued. The approval process for new products needs to include energy efficiency ratings for far more products than at present. In the United Kingdom for example, new buildings and fittings need to be energy efficient and all appliances installed in new buildings are required to have 5-star energy efficiency ratings.

78. The Ministry of Business, Innovation and Employment (MBIE) is considering a range of initiatives and incentives to reduce construction waste and increase reuse, repurposing and recycling of materials. Are there any options not specified in this document that you believe should be considered?

Council would like to point out that materials may be reusable in some circumstances, but not for new buildings as standards have been upgraded while those products have been in use. Therefore, the market for reusable materials may not be as great as envisaged. Increased reuse of building materials could be encouraged by incentivising building upgrades and extensions instead of placing greater reliance on replacement housing or new builds. This needs to be considered as part of the connected and strategic thinking between the ERP, the resource management reforms and the NPS for Urban Development.

79. What should the Government take into account in exploring how to encourage low-emissions buildings and retrofits (including reducing embodied emissions), such as through financial and other incentives?

Council believes this must include re-training programmes driven my MBIE to create a highly skilled workforce.

Council also has concerns that building upgrades and retrofits will be slowed by product shortages, rising interest rates and the availability of finance, and increasing standards, all of which contribute to increasing costs. Council suggests the government considers some kind of KiwiSave-type contributory scheme to enable building owners to save for future upgrade costs; this would include mandatory use of suppliers who are able to achieve cost

reductions similar to the All-of-Government procurement scheme, and who would then be able to self-certify their work without a building consent. Costs would further be reduced by having products and installations approved in advance for energy efficiency works.

80. What should the Government take into account in seeking to coordinate and support workforce transformation, to ensure the sector has the right workforce at the right time?

In Council's view there needs to be a robust, MBIE-driven scheme of trainee/cadetships to raise the skills level and capacity for new technologies and constructing energy efficient buildings and retrofitting existing buildings. New Zealand currently does not enough skills in this area. An interim gap-analysis is required to determine the present skills gap with a view to attracting skills from overseas.

Council would like to see products made locally as this would help the domestic manufacturing sector as well as providing employment and training and hopefully reducing product costs.

81. Our future vision for Aotearoa includes a place where all New Zealanders have a warm, dry, safe and durable home to live in. How can we ensure that all New Zealanders benefit from improved thermal performance standards for our buildings?

Council asks that the government raises the level on minimum standards within the Building Code for new builds and retrofits. New Zealand should benchmark with countries such as the United Kingdom when reviewing its building regulations.

Do building constructed prior to the Building Code need a different energy efficiency code? If so, who would enforce and administer it?

82. Are there any other views you wish to share on the role of the building and construction sector in the first emissions reduction plan?

Council comments that there needs to be a major culture change in the New Zealand building sector and environment. The most energy efficient products need to be produced (preferably locally, or within New Zealand), transported and installed in the most energy efficient way to an energy efficient design.

Waste

89. The Commission's recommended emissions reduction target for the waste sector significantly increased in its final advice. Do you support the target to reduce waste biogenic methane emissions by 40 per cent by 2035?

It is appropriate that the responsibility to reduce emissions from waste is shared where the waste is generated. According to the Waste Strategy (currently under consultation)

"household waste makes up about 20 per cent of total waste disposed of in Aotearoa" and it could be assumed that councils are responsible for 11% of methane from wastewater treatment. Therefore, a large part of the responsibility for reducing methane from waste needs to sit with the other large waste -and specifically organic waste - generators.

Overall it is an ambitious target, and without any surety of funding and support from Central Government it is hard to assess if it is achievable.

Council undertook a Solid Waste Audit in late 2020, and that showed that food waste is a large proportion of household waste at 36.6% (green waste and 'other organic' were 13.6%). Purely from a methane reduction perspective a solution is to offer a kerbside food waste collection service to remove this element of waste from landfill. The question is how to do that without over burdening ratepayers? These services are more costly in small districts, due to the lack of affordable infrastructure and therefore the costs on moving resources to recovery facilities elsewhere. Ensuring Government support to allow equal access to services and Government supported infrastructure is important.

90. Do you support more funding for education and behaviour change initiatives to help households, communities and businesses reduce their organic waste (for example, food, cardboard, timber)?

Council supports this proposal. Research shows that people can be very informed and educated, but this does not necessarily translate into a change in habits or behaviours. Committing to education programmes will be the key to attain a change in behaviour rather than just an increase in knowledge. And where some emissions are linked to very socially popular trends like fast fashion and our consumeristic lifestyles, this work needs to be acknowledged to be a long term initiative.

91. What other policies would support households, communities and businesses to manage the impacts of higher waste disposal costs?

Council would agree with subsidised or supported services such as more product stewardship schemes. Priorities could be batteries and tyres; treated timber and other construction products; a bed mattress and frame scheme as in Australia. Producers need to take more responsibility for the end-of-life of their products, not the consumers or councils. Currently transport costs more than landfill (especially for heavy items) so it is not viable to expect change from the industry until that financial tipping point is reached. Council cannot ask or encourage our community to do better when there are no services locally that can accept materials.

92. Would you support a proposal to ban the disposal of food, green and paper waste at landfills for all households and businesses by 1 January 2030, if there were alternative ways to recycle this waste instead?

Council's support would be dependent on the access to, and the cost of, alternative treatments for the Waipā community. A target date of 2030 provides a short space of time to use existing council procedures (Long Term Planning processes, community consultation, commercial tender process and contract development, and community education etc) to start a food waste collection.

93. Would you support a proposal to ban all organic materials going to landfills that are unsuitable for capturing methane gas?

Council supports this proposal.

94. Do you support a potential requirement to install landfill gas (LFG) capture systems at landfill sites that are suitable?

Council supports this proposal. Companies should be supported to purchase the machines they need to convert **all** the methane captured into energy.

95. Would you support a more standardised approach to collection systems for households and businesses, which prioritises separating recyclables such as fibre (paper and cardboard) and food and garden waste?

Council supports standardising which items and in what condition will be accepted in collection systems. This would enable national advertising on a simple list of what can and cannot be recycled. One benefit of this would be to create pressure on companies to adopt appropriately recyclable packaging; and on consumers to clearly understand the packaging they purchase would not be accepted by the council-provided recycling service.

96. Do you think transfer stations should be required to separate and recycle materials, rather than sending them to landfill?

In Council's opinion, this is a description of a resource recovery centre, which is the ambition for waste diversion (and thus methane reduction). However, these often require more funding as more space and many more staff are needed to assist the community to separate their loads. Establishing a financial package to support existing transfer stations to purchase adjoining land (where possible) and increasing the number of waste streams for diversion, plus increasing staffing levels to support much higher resource recovery, is a welcome suggestion for transitioning from the status quo to improved resource recovery.

99. What other options could significantly reduce landfill waste emissions across Aotearoa?

Council proposes the following options:

a) Identifying options for treated wood (reduction, diversion and disposal)

Develop a product stewardship scheme for treated timber. This is a massive waste stream, but it is cost prohibitive to ship it to the very few places in New Zealand that have a genuine use for it.

b) Reducing waste from construction and demolition

There needs to be equitable access to Government-supported diversion infrastructure such as construction and demolition material recovery centres for the regions. In the Waikato there is no such access for construction and demolition diversion. Transporting waste for diversion is cost prohibitive. Equitable access for all regions therefore needs to be included when developing infrastructure to support removal of wood and plaster board from landfill.

c) Fast-tracking a waste data and licensing system

Requiring all councils to licence and obtain data from the same few companies (where trucks often cross council boundaries) is a huge replication of effort for both council and industry. Licencing at a Regional Council level is a sensible development. Council bylaws are not an easy tool to ensure compliance when the industry cites "commercial sensitivity" as a reason to not provide data for Waste Assessments (a MfE requirement for developing a Waste Minimisation and Management Plan to receive Waste Levy funds).

d) Partnerships and collaboration will be key to achieving our goals. In particular, partnerships between local authorities, industry and community.

Council welcomes genuine partnerships and an understanding of what is happening with central government's partners in local government. However, the key is understanding and respecting Council processes and timeframes in order to get genuine feedback via workshops or meetings on policy development, not just consultation. This is true across all the sectors identified in this Emissions Reduction Plan discussion document.