

Wellington Regional Council submission on:

“Kyoto Protocol: Ensuring our Future”

1. **Introduction**

- 1.1 The Wellington Regional Council is pleased to have the opportunity to make a submission on the Climate Change Consultation Paper.
- 1.2 The submission provides some background comments about where this submission fits within a bigger picture of consultation, and then proceeds to identify specific comments on the Consultation Paper.

2. **General Comments**

- 2.1 This submission is the latest in a series made by the Regional Council in recent years on climate change. The *Regional Policy Statement* for the Wellington Region has a number of policies and provisions that are relevant (particularly those in the Air Quality, Energy and Natural Hazard chapters). Essentially, the policy position has been to support Government initiatives aimed at reducing greenhouse gas emissions, recognising that climate change needed national leadership, and anticipating the need for local action to adapt to the possible effects of change.
- 2.2 The most recent submission made by the Council was to the Local Government and Environment Select Committee on “The role of local government in meeting New Zealand’s climate change target” (March 2001).
- 2.3 The unifying theme between the Council’s recent submissions has been that there needs to be a more explicit link between climate change policy and other strategies and policies that are also being developed by Government. Among these are the newly operative Energy Efficiency and Conservation Strategy, the Vehicle Fleet Emission Control Strategy, the upcoming National Transport Strategy and the Biodiversity Strategy. Also relevant has been the review of emergency management in New Zealand.
- 2.4 In some ways, it could be argued that climate change is not only a connector between these other strategies, but it is also a key **indicator** of their success. If the policies in these strategies are working, then New Zealand will be making good progress towards meeting the spirit of the Kyoto Protocol, both in reducing greenhouse gas emissions and adapting to the effects of climate change.

- 2.5 A secondary but related point made in Regional Council submissions is that for local government to support Government action on climate change, it would be helpful to have a statutory mandate for involvement.
- 2.6 The Select Committee has recently reported, and it is pleasing to see many of the Regional Council's points reflected in the report and its recommendations. Several of the Select Committee's recommendations point to the need for greater integration of legislation and associated policy across the fields of transport, energy, land management and conservation. Recommendation 22 concerns one agency for assessing all government policy proposals that impact on climate change and sustainability.
- 2.7 There are also, separately, proposals for sustainability to be included in the amendments to the Local Government Act as part of the functions of local authorities. This change, together with those that might flow from the Select Committee recommendations, may achieve the crucial linkage between related parts of climate change and provide justification for local government to be involved.
- 2.8 The Regional Council feels that local government has an important role to play in climate change, flowing from:
- management of the environment;
 - provision of local infrastructure and services; and
 - opportunities provided for local participation, education, action and leadership.
- 2.9 Responsibilities can be classified as regulatory, adaptive, operational, promotional and what might be described as "co-benefit" (such as the way core business, like transport and biodiversity management, is carried out so that there are also targeted benefits for climate change). However, as noted above, it would be helpful, and produce more effective outcomes, if these responsibilities and roles in climate change were more explicitly mandated (and resourced) by Government and in partnership with local government.
- 2.10 In summary, the Regional Council sees that there are numerous aspects to the climate change issue, and that there are a variety of possible roles for the Council to play. These roles are complementary to actions that the Government might also take, such as introducing legislation that applies nationally to all sectors of community and business, and procedural legislation that helps fulfil its international obligations. But local government does not operate in a market. While it operates as a sector within the national economy, its objectives are not purely market driven, and its services are qualitative as well as quantitative.
- 2.11 It is within this context that the Regional Council makes the following more specific points about the current Consultation Paper.

3. **Specific Comments on “*Kyoto Protocol – Ensuring our Future*”**
- 3.1 The Consultation Paper is essentially seeking comment on two things – the ratification of the Protocol and the market based policy options for helping meet New Zealand’s target for greenhouse gas emissions through the period 2008-2012.
- 3.2 Because of the focus on these two things, the wider picture of climate change and the various related steps that have been, or are yet to be taken, is not as clear as it might be. As a result, media attention has narrowed from a wider global and local environmental integrity view to a purely financial/economic assessment of market mechanisms. Nearly all of the concern has been about the risks to the New Zealand economy resulting from what is seen to be an overly-fast attempt to ratify the Protocol prior to the Rio+10 Summit in Johannesburg next September.
- 3.3 While the Regional Council does not offer much comment on the market mechanisms outlined in the Consultation Paper (for reasons explained later), it would stress that the focus on these aspects has detrimentally distracted debate away from the bigger picture aspects of the Kyoto Protocol. The wider community is perhaps more interested in other environmental and social aspects of climate change – and as noted above, many of these aspects relate to responsibilities that local government has for environmental management.
- 3.4 In general, and consistent with the ***Regional Policy Statement’s*** provisions and previous submissions made by the Regional Council, the notion of supporting international moves to manage climate change is endorsed. However, the Council does have some concerns about the speed with which the Government wishes to ratify the Kyoto Protocol.
- 3.5 The Regional Council’s concern in this regard and other related comments about the Consultative Paper closely match those identified by Local Government New Zealand (LGNZ). In particular, the Regional Council supports LGNZ in noting the following:
- there are too many options and not enough accurate supporting information and data to clearly judge them;
 - there is still a lack of clarity from central government about what it sees as local government’s role in responding to climate change; and
 - the options proposed in the current consultation document are largely market-based and do not acknowledge, or link with, the many activities of local government that have climate change co-benefits.
- 3.6 Accordingly, the Regional Council:
- **agrees** that New Zealand must participate in initiatives that reduce greenhouse gas emissions; BUT
 - **requests** accurate and complete information that documents the economic, social and environmental costs and benefits of ratification

- **seeks** clarification of the Government’s expectations of local government in responding to climate change
 - **suggests** that a comprehensive approach be adopted to greenhouse gas reductions that is centred in *sustainable development*, and fully embraces not only market, but also non-market/co-benefit initiatives, (e.g. energy efficiency, waste minimisation, transportation and urban form)
 - **requests** that central government place a higher priority on working with local government to co-ordinate methods that will assist communities to ‘adapt’ to climate change; this includes better information about the regional effects of climate change
 - **requests** accurate information that will enable decisions to be taken about the relative return on local authority investment that will accrue from non-market and co-benefit greenhouse gas emission reduction initiatives
 - **requests** assistance from central government with developing inventories, targets, templates and programmes that will guide and give focus to local initiatives (e.g. those developed by ICLEI’s Cities for Climate Protection programme and EECA)
 - **requests** that uncertainties surrounding use of the RMA in managing climate change be addressed – specifically this refers to excluding CO₂ from the RMA, and providing guidance on using the RMA to better facilitate activities that have climate change co-benefits
 - **requests** that in establishing a national inventory as part of the proposed Climate Protection Bill Part I, information is collected and reported in such a way as to provide for assessment of emissions at a regional and local level wherever possible
- 3.7 Until these requests are progressed, the Regional Council feels that Government should **not** ratify the Kyoto Protocol.