

Call for evidence



We are calling for evidence on options available to reduce greenhouse gas emissions over the period 2022 to 2035.

Why are we doing this?

The Interim Climate Change Committee is the precursor to the proposed Climate Change Commission, expected to be established in late 2019 under the Zero Carbon Bill¹. The Bill provides a framework to help New Zealand deliver on the objectives of the Paris Agreement.

A key part of the proposed Commission's work will be to advise the Government on emissions budgets.

Emissions budgets set the total emissions of all greenhouse gases permitted in the relevant budget period. The Government will set emissions budgets based on the proposed Commission's advice.

Why are we doing this now?

We are running this call for evidence now as foundation work for the proposed Climate Change Commission to enable it to start work immediately as soon as it is set up.

It will help identify relevant information for developing these emissions budgets, and to maintain a broad, robust and transparent approach in developing the proposed Commission's evidence base.

We have been asked to do this through our [Terms of Reference](#). This work is also outlined in our letter to the Minister for Climate Change on 7 May 2019 [here](#).

What are we looking for?

We are looking for high-quality, credible, evidence that will support the proposed Commission's work on emissions budgets. This is likely to include knowledge and evidence of technologies and options to reduce emissions, and the economic, environmental, cultural and social impacts of them. We are not looking for personal views or opinions.

What if I have already made submissions on similar topics?

If you have already submitted evidence as part of consultation run by Government agencies, such as the Zero Carbon Bill or the Ministry of Transport's Clean Car Standard and Discount, then we are happy for you to point us to those submissions, noting the key information or material that relates to our call for evidence.

¹ Climate Change Response (Zero Carbon) Amendment Bill:
<http://www.legislation.govt.nz/bill/government/2019/0136/latest/LMS183736.html>.

What will we do with the evidence we gather?

We will use this information to inform our initial work on emissions budgets and add to the evidence base the proposed Commission will draw upon.

Confidentiality and data protection

All or part of any written response (including the names of respondents) may be published on our website www.iccc.mfe.govt.nz. Unless you clearly specify otherwise, we will consider that you have consented to both your name and response being published.

Please be aware that any responses may be captured by the Official Information Act 1982. Please advise us if you have any objection to the release of any information contained in your response, including commercially sensitive information, and in particular which part(s) you consider should be withheld, together with the reason(s) for withholding the information. We will take into account all such objections when responding to requests for copies of, and information on, responses to this document under the Official Information Act.

The Privacy Act 1993 applies certain principles about the collection, use and disclosure of information about individuals by various agencies, including the Interim Climate Change Committee. It governs access by individuals to information about themselves held by agencies. Any personal information you supply to the Committee in the course of making a response will be used by the Committee only in relation to the matters covered by this document. Please clearly indicate in your response if you do not wish your name to be included in any summary of responses that the Committee may publish.



Call for evidence: response form

We are looking for responses that are evidence-based, with data and references included where possible. Please limit your response to each question to a maximum of 400 words, plus links to supporting evidence, using the template provided. Please answer only those questions where you have particular expertise or experience.

We recommend that you refer to the Climate Change Response (Zero Carbon) Amendment Bill when considering your answers, which can be found [here](#).

If you have any questions about completing the call for evidence, please contact us via feedback@ICCC.mfe.govt.nz. Please include a contact number in case we need to talk to you about your query.

Please email your completed form by **12 noon, Friday 15 November 2019** to feedback@ICCC.mfe.govt.nz. We may follow up for more detail where appropriate.

Contact details

Name and/or organisation	Concrete New Zealand (NZ) Inc.
Postal Address	
Telephone number	
Email address	

Submissions on similar topics

<i>Please indicate any other submissions you have made on relevant topics, noting the particular material or information you think we should be aware of.</i>
Answer: New Zealand Green Building Council Embodying Change: A Low Carbon Future for New Zealand's Built Environment 09 August 2019 Environment Select Committee Climate Change Response (Zero Carbon) Amendment Bill 16 July 2019 Ministry for the Environment (MfE) Zero Carbon Bill 'Our Climate Your Say' Discussion Document 19 July 2018

Commercially sensitive information

Do you have any objection to the release of any information contained in your response, including commercially sensitive information?

If yes, which part(s) do you consider should be withheld, together with the reason(s) for withholding this information.

Answer:

Questions for consideration:

Section A The first three emissions budgets

Under the proposed Zero Carbon Bill, the proposed Commission will have to provide advice to government on the levels of emissions budgets over the coming decades.

Currently, the Zero Carbon Bill requires budgets to be set from 2022-2035 (three separate budgets covering 2022-2025, 2026-2030, and 2031-2035). When preparing this advice the proposed Commission will have to consider the implications of those budgets for meeting the 2050 target. The Commission will also need to consider the likely economic effects (positive and negative) of its advice.

Question 1:

In your area of expertise or experience, what are the specific proven and emerging options to reduce emissions to 2035? What are the likely costs, benefits and wider impacts of these options? Please provide evidence and/or data to support your assessment.

Answer:

Considerable reductions in energy use (and therefore CO₂ emissions) in New Zealand have been realised over the past decade by improving the efficiency of the cement kiln operation, a significant energy user.

New Zealand's sole cement manufacturer, Golden Bay Cement, uses alternative waste fuels for a substantial part of its operations and is continually examining the practicalities of increased supplementation.

- A significant proportion of fossil fuel is substituted with wood waste.
- Fossil fuel substitution with waste vehicle tyres will begin shortly.

The environmental benefits of using alternative fuels in cement manufacture are numerous:

- The need to use non-renewable fossil fuels such as coal is reduced.
- Using alternative fuels maximises the recovery of energy from waste, reduces methane emissions, and saves landfill space.

The increasing global use of Supplementary cementitious materials (SCMs) to replace cement and therefore directly reduce embodied CO₂ makes sound ecological sense. SCMs are derived from lower embodied energy, industrial by-products or waste materials, and can result in environmental benefits, improved concrete performance, and long-term cost advantages.

SCMs are typically ground granulated blast furnace slag (waste from steel manufacture), fly ash (waste from coal combustion) or microsilica. There are issues (availability, price, reluctant customers/specifiers and conformance difficulties) that currently limit SCM uptake in New Zealand.

Volcanic ash (natural pozzolans) from New Zealand's North Island Volcanic Plateau is another type of SCM. The advantage of natural pozzolans is that there is a stable local supply, meaning they have the potential to be cost competitive.

New Zealand cement suppliers are currently investigating pozzolan blended cements with around 20-25 percent cement substitution.

Question 2:

In your areas of expertise or experience, what actions or interventions may be required by 2035 to prepare for meeting the 2050 target set out in the Bill? Please provide evidence and/or data to support your assessment.

Answer:

New Zealand operates a performance-based building code system that permits users multiple ways to demonstrate compliance with the NZ Building Code, of which 'Standards' are one way.

The concrete industry is expected to remain a standards-centric industry where the use of Standards is encouraged to achieve consistent outcomes for design and construction in concrete.

Confidence in Standards is dependent on them being revised on a systematic basis to ensure they are relevant and incorporate the lessons learnt from real events and research.

An example of such research is that being undertaken by the concrete industry to investigate the above mentioned natural pozzolans both in terms of classification and optimising performance to allow easy adoption by designers and construction staff.

Backing and funding for developing a new (or even maintaining the old) framework should still be sought (and provided) by the relevant government agencies, acknowledging their obligations under legislation such as the Building Act.

Question 3:

In your areas of expertise or experience, what potential is there for changes in consumer, individual or household behaviour to deliver emissions reductions to 2035? Please provide evidence and/or data to support your assessment.

Answer:

Question 4:

When advising on the first three emissions budgets and how to achieve the 2050 target, what do you think the proposed Commission should take into account when considering the balance between reducing greenhouse gas emissions and removing carbon dioxide from the atmosphere (including via forestry)?

Answer:

A holistic, inter-generational approach needs to be adopted in terms of what the Commission should take into account when considering the balance between reducing greenhouse gas emissions and removing carbon dioxide from the atmosphere (including via forestry).

An interest in broad wellbeing has recently been signalled by the New Zealand government. Wellbeing is measured via the Treasury's *Living Standards Framework*.

The Framework holds that inter-generational wellbeing depends on the growth, distribution and sustainability of four interdependent capitals: Human, Social, Physical & Financial, and Natural. Wellbeing in the Four Capitals can be measured by indicators that include Housing, Incomes, Jobs, Community, Education and the Environment etc.

In short, emphasis and priority should be given to long-term sustainable solutions.

Question 5:

What circumstances and/or reasons do you think would justify permitting the use of offshore mitigation for meeting each of the first three emissions budgets? And if so, how could the proposed Commission determine an appropriate limit on their use?

Answer:

The use of offshore mitigation for meeting each of the first three emissions budgets should be permitted. Climate change is primarily a global, not local issue. However, there needs to be robust, scientific evidence that clearly demonstrates / verifies that the offshore mitigation utilised is as effective as claimed.

Section B Emissions reduction policies and interventions

The proposed Commission will also need to consider the types of policies required to achieve the budgets it proposes. This consideration should include:

- sector-specific policies (for example in transport or industrial heat) to reduce emissions and increase removals, and
- the interactions between sectors and the capability of those sectors to adapt to the effects of climate change.

Question 6:

What sector-specific policies do you think the proposed Commission should consider to help meet the first emissions budgets from 2022-35? What evidence is there to suggest they would be effective?

Answer:

Question 7:

What cross-sector policies do you think the proposed Commission should consider to help meet the first emissions budgets from 2022-35? What evidence is there to suggest they would be effective?

Answer:

Question 8:

What policies (sector-specific or cross-sector) do you think are needed now to prepare for meeting budgets beyond 2035? What evidence supports your answer?

Answer:

Significant government funding to maintain construction industry Standards that support the *NZ Building Code* is needed now to prepare for meeting budgets beyond 2035.

To progress a systemised framework for structural design and material production Standards backing from Government agencies will be necessary and should be provided. This will require a considerable step change from the current levels of support and investment Government agencies are providing towards standards development.

There should be no impediment to the Government providing the necessary funding for Standards development in New Zealand. The Vote Building and Housing Memorandum

Account, obtained from building consent application fees, that funds the operation of the building regulator, has now accumulated to a surplus in excess of \$42 million as at June 2018 (MBIE, 2018).

The Government has a duty to invest money obtained from the Building levy to maintain processes and systems that support consistent and efficient compliance with the building code.

Section C Impacts of emissions budgets

The proposed Commission will need to consider the potential social, cultural, economic and environmental impacts of emission budgets on New Zealanders, including how any impacts may fall across regions and communities, and from generation to generation. Potential impacts may be either positive or negative.

Question 9:

What evidence do you think the proposed Commission should draw upon to assess the impacts of emissions budgets?

Answer:

In order for the proposed Commission to assess the impacts of emissions budgets it should primarily draw on a range of economic indicators. However, Concrete NZ also believes Treasury's Living Standards Framework is a helpful tool that emphasises the diversity of outcomes meaningful for New Zealanders, and helps with analysing, measuring and comparing those outcomes through a wide and evolving set of indicators.

Download a copy of BERL's summary report [An Assessment of Concrete's Contribution to Living Standards in New Zealand](#).

Question 10:

What policies do you think the proposed Commission should consider to manage any impacts of meeting emissions budgets? Please provide evidence and/or data to support your assessment.

Answer:

Section D Other considerations, evidence or experience

Question 11:

Do you have any further evidence which you believe would support the future Commission's work on emissions budgets and emissions reduction policies and interventions?

Answer:

Please email your completed form to feedback@ICCC.mfe.govt.nz by **12 noon, Friday 15 November 2019**.

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