**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 Bill[[1]](#footnote-1). 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](https://www.iccc.mfe.govt.nz/assets/PDF_Library/57c3716753/AMENDED-Terms-of-Reference-for-the-Interim-Climate-Change-Committee-May-Dec-2019.pdf). This work is also outlined in our letter to the Minister for Climate Change on 7 May 2019 [here](https://www.iccc.mfe.govt.nz/our-news/updates-from-the-chair/iccc-work-programme-from-1-may-2019/).

**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.

**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](http://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](http://www.legislation.govt.nz/bill/government/2019/0136/latest/LMS183736.html).

If you have any questions about completing the call for evidence, please contact us via [feedback@ICCC.mfe.govt.nz](mailto: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](mailto:feedback@ICCC.mfe.govt.nz).We may follow up for more detail where appropriate.

**Contact details**

|  |  |
| --- | --- |
| *Name and/or organisation* | *Robert Tromop*  *Efficient Energy International Limited* |
| *Postal Address* |  |
| *Telephone number* |  |
| *Email address* |  |

**Submissions on similar topics**

|  |
| --- |
| *Please indicate any other submissions you have made on relevant topics, noting the particular material or information you think we should be aware of.* |
| *Answer:* |

**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: Carbon reductions are achieved by 4 means only: energy efficiency, renewable energy, nuclear energy and carbon capture and storage. Both energy efficiency and renewable energy offer an estimated 75% of economic potential for global emissions reduction (successive IEA analyses from the 2012 WEO focus on energy efficiency).*  *As neither nuclear or CCS are economic options, the CCC must focus on maximising investment in energy efficiency and renewable energy in all demand and supply sectors in NZ. The costs, benefits and impacts are well analysed in various sources.* |

|  |
| --- |
| *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:*  *Develop significant market transformation programmes for energy efficiency and renewable energy.*  *Ensure the 100% renewable electricity policy is achieved by 2035 or earlier. It represents 9% of the tractable emission reductions in NZ and is an important early win and leader of change.*  *Shift transport investment priorities to low carbon modes.* |
| *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: The scope is significant – already a single policy, the product efficiency regulations are halving the growth in demand for electricity. These can be built on by promoting high efficiency and renewable energy options. NZ experience already highlights the success of the Energy Spot and the global ENERGY STAR programmes. These should be reinstated.*  *A key challenge is in capacity building. I lead CEPNZ’s Energy-Carbon Manager Programme the only capacity development programme in NZ that grows the skills and capacity to invest in energy efficiency and renewable energy solutions to mitigate carbon and advance low-C productivity. There is an urgent need to develop capability in change. Participants develop policies and plans to reduce emissions and grow their low-C productivity. Some have set 10year policies to advance to net-zero carbon targets.* |

|  |
| --- |
| *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: Prioritise investments in energy efficiency and demand side renewable energy as these offer better return on investment than supply side renewable energy with significant productivity and social wellbeing multiple benefits.* |

|  |
| --- |
| *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: Offshore mitigation is not a priority. NZ is capable reducing demand for fossil energy with energy efficiency and renewable energy.*  *The Energy Efficiency and & Conservation Act 2000 offers an effective process and measures if properly implemented. We have yet to develop the options at scale, but experiences in market transformation in technologies like space heating heat pumps show practical market transformation programmes can achieve substantial change in emission from energy efficiency and renewable energy. Recognise that we are yet to engage in a full-scale learning process, only the NZ product efficiency programme and NZBC operate at scale.* |

**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:*  *The proposed feebate, product efficiency programme, have clear performance examples. So do market transformation programmes but these need to be continued at scale. Significant capacity building is required: new low-carbon managerial skills, investment skills etc.* |

|  |
| --- |
| *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: Capacity building is required in all sectors.* |

|  |
| --- |
| *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:*  *Market transformation programmes for:*  *Heat pumps for homes, commercial buildings and industrial processes*  *Solar or heat pump water heating, heat pump space heaters in NZBC (return as good or better than either double glazing or insulation which are already mandated)*  *Continuous commissioning for commercial buildings and industrial processes. CEPNZ members already typically achieve 30% reductions in energy use with 1-1.5 year returns on investment.*  *Renewables for commercial buildings and industry*  *Market development strategy for EVs* |

**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: Undertake an up to date potentials analysis. The OPENZ model should be updated.* |
| *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: The impacts of energy efficiency and renewable energy measures are investments that offer returns in productivity and wellbeing. See IEA publication; Capturing the Multiple Benefits of Energy Efficiency* |

**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: There is plenty of evidence published internationally. The key is however in creating an innovation and learning process at scale in NZ. I would be happy to meet with CCC and develop details. (I found out about this consultation effort the day before it closes and don’t have time to provide details now).* |

Please email your completed form to [feedback@ICCC.mfe.govt.nz](mailto:feedback@ICCC.mfe.govt.nz) by **12 noon, Friday 15 November 2019.**

If you have any questions about completing the call for evidence, please contact us via [feedback@ICCC.mfe.govt.nz](mailto:feedback@ICCC.mfe.govt.nz).

1. Climate Change Response (Zero Carbon) Amendment Bill: <http://www.legislation.govt.nz/bill/government/2019/0136/latest/LMS183736.html>. [↑](#footnote-ref-1)