

By email

23 August 2024

Email to: ERPconsultation@mfe.govt.nz

Tēnā koutou katoa,

Second Emissions Reduction Plan – Hutt City Council Submission

Hutt City Council (HCC) thanks you for the opportunity to make a submission on the second Emissions Reduction Plan (ERP2).

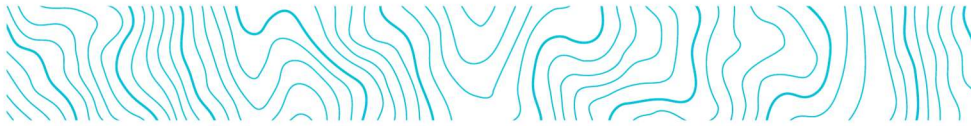
As a territorial authority, HCC is responsible for a range of functions relevant to climate change and is taking action to reduce its own organisational emissions, as well as support the city in reducing city-wide emissions wherever possible. For example, so far the council has:

- Removed fossil gas from some of its key facilities, and is on track to have phased out the use of gas by 2030
- Achieved a 69% electrification share for its own vehicle fleet
- Made key changes at Silverstream Landfill to optimise gas destruction, including through a supplementary flare to complement the power plant
- Is working to decarbonise services where delivery is contracted out to private contractors
- Made changes to its district plan, with key requirements in place to encourage compact urban form to reduce sprawling infrastructure and transport emissions
- Is planning for the introduction of a food and green organics waste collection service in 2027
- Invested in micromobility routes to enable low emissions transport in the city
- Installed public fast-chargers to encourage the uptake of EVs

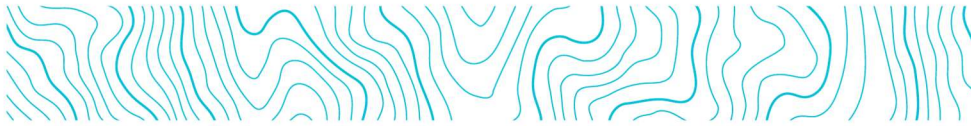
However, tackling emissions is a team effort, and there are several changes where action by the government is essential, to enable gross emission reductions in line with halving emissions by 2030, and achieving net zero by 2050.

Our submission points below are general points on the overall approach taken by the government on the ERP2 and are not answering specific consultation questions.

HCC has significant concerns regarding the proposed Emissions Reduction Plan. Examples of our concerns are as follows:



- 1. Heavy reliance on offsetting through forestry and carbon capture and storage:** While carbon offsetting will play a role in the pathway to net zero, there is an over reliance on this tool, which will leave the country unnecessarily exposed and vulnerable to fluctuations in carbon price and international market pressures. Prioritising offsetting and forestry and relying on unproven technologies like carbon capture is not the same as actual emissions reductions. Forestry units should be left for offsetting unavoidable emissions and hard to abate sectors while solutions are developed. We want to see the government focusing on gross emissions reduction and reducing reliance on offsetting.
- 2. A singular focus on waste infrastructure:** Gas capture in landfills has a role to play in reducing emissions from waste. However, commitment to waste prevention and reduction actions from the government are crucial for reducing emissions and pressure on disposal facilities at a local level. It is important for local government to have more clarity regarding the government's waste plans including in relation to the National Waste Strategy – *Te Rautaki Para* to ensure that there remains a clear long-term direction for transforming the way we generate and deal with waste in New Zealand.
- 3. Lack of support for electrification of the energy sector:** While it is acknowledged that increasing renewable energy generation is one of the important levers in the energy transition, the plan is silent on how the government will decrease reliance on fossil fuels, particularly natural gas, coal, petrol and diesel. In addition, there should be an acknowledgement that microeconomic decisions in households cumulatively become macroeconomic impacts. We think there is a crucial opportunity for customer generated electricity to enable and speed up electrification both as it increases grid capacity, but also creates financial incentives to electrify more machinery (cars, cook tops, heaters, lawn mowers and more).
- 4. Missing the opportunities for electric homes:** New Zealand is one of the first countries to reach the 'electrification tipping point' where households can save money while significantly reducing their emissions by electrifying their appliances and vehicles. So electrification is not a sacrifice or a cost to bear, it is an opportunity to improve our lives [in a number of different ways](#). There are readily available and cost competitive electric alternatives to machines reliant on fossil gas in the home and other low and medium heat applications. [Rewiring Aotearoa's](#) reports demonstrate the benefits associated with electrification. But the government has a role to play in supporting a just transition by providing policy settings that avoid further investment in fossil gas reliant technology.
- 5. Lack of support for transport electrification:** Rapid policy changes over the last six months (e.g. removal of the vehicle discount scheme, the rushed introduction of road user charges for EVs) has generated significant market uncertainty and cooled demand for EVs. This has slowed the transition to low and zero emissions light vehicles. Current policy tools on their own are unlikely to drive a shift to lower-carbon modes of transport and to decarbonise freight and aviation. In addition, there is significant need for increased investment in public and active transport, encouraging the electrification of



private vehicles, support for low-income households to electrify their homes, and to support the decarbonisation of industry sectors. The government's draft plan lacks this.

To sum up our submission. The government's draft plan is not good enough. There is not enough in this plan to enable the necessary gross emission reductions. Hutt City Council would welcome the opportunity to work collaboratively with the government on achieving our shared goal of emission reductions, in the second and third emissions budgets.

In addition to this submission, Hutt City Council would also like to acknowledge the detailed submissions submitted by Greater Wellington Regional Council and Wellington City Council. HCC encourages the government to consider the detailed points raised in these submissions.

Yours sincerely

Councillor Josh Briggs

Chair of the Climate Change and Sustainability Committee