

27 March 2021



The Catholic Agency for Justice, Peace & Development

## Submission to Climate Change Commission

### Introduction

1. Caritas Aotearoa New Zealand is the Catholic agency for justice, peace and development. We work on behalf of the New Zealand Catholic Bishops Conference (NZCBC) for a world free of poverty and injustice through community development, advocacy, education, and emergency relief. We are mandated to analyse issues of injustice; identify root causes and construct appropriate responses; and to be a voice for the Catholic Church on matters of justice, peace and development.
2. In concert with sister agencies across the Pacific and around the world, we have seen and responded to the impact of climate change on the poor for the last two decades. Over the last seven years, our stories of impact and recommendations to address climate change can be found through our [Caritas State of the Environment for Oceania](#) report series. We advocate for climate change mitigation and adaptation measures that centre on human dignity, prioritise the poor, advance the common good and protect our planet. In doing so, we are guided and inspired by Catholic Social Teaching, especially *Laudato Si': On Care for our Common Home*, Pope Francis' 2015 letter to humanity on ecology. In the spirit of *Laudato Si'*, we make this submission on behalf of today's poor, of generations yet unborn, and the Earth herself, whom Pope Francis describes as "among the most abandoned and maltreated of our poor" (*Laudato Si'*, para 2)
3. We make this submission in the form of a brief overall response and list of key concerns below, followed by specific responses to the Commission's six big issues, and most of the detailed consultation questions.

### Overall response

4. We commend and support the Climate Change Commission's recognition of the need for strong, decisive action to achieve transformational and lasting change, in a coordinated, and holistic way; while ensuring that poor people and vulnerable workers and sectors are enabled to make a just and fair transition to a carbon neutral economy. We acknowledge the Commission seeks to strike a balancing act between what is politically and economically feasible, and ensuring New Zealand is a leader in honouring our global commitments. However, putting the poor first, and considering the present impacts of climate change and severity of predicted future impacts, as well as acknowledging our historical contribution and benefits from fossil fuel use, we consider New Zealand can and must go 'harder and faster' to cut greenhouse gas emissions. A similar sense of urgency, and need to protect human and planetary health, should inspire our response to the 'climate emergency', just as it done for the COVID emergency. Climate change is already hitting the poor the hardest, and will affect us all. The longer we take to act, the harder it will be.
5. Our research through the *Caritas State of the Environment for Oceania* reports indicates many Pacific Islanders have been experiencing tangible impacts of climate change for 2-3 decades. For example, Carteret Islanders, living on a series of atolls offshore from Bougainville in Papua New Guinea, are being forced to the mainland by climate change. Ursula Rakova, who leads the community organization Tulele Peisa said her own island of Huene in the group was cut in two in 1984 by the rising sea. In 2015, we were told how residents of Abaiang atoll in Kiribati faced regular flooding of homes at high tide. Living with the ongoing climate emergency is a fact of life for many in the Pacific, alongside other difficulties.

6. Our key concerns are:

- Emissions reductions must be compatible with keeping global temperature rise below 1.5C and reaching that target as rapidly as possible, keeping ‘the poor’ front and centre
- Climate change is one of several indicators of a world out of balance. The greed and selfishness of a few, or certain groups of people, is also manifest in gross inequality, extreme poverty, human rights abuses, and other types of environmental degradation. Action to address climate change must work in concert with other measures to address interrelated environmental, social and economic crises in an integrated way. Such action needs to prioritise the poorest, most vulnerable and most neglected. We cannot pursue endless consumerism and profit maximisation without full consideration of the impact on people and planet. An integrated development approach is mindful of growth in other dimensions of human behaviour – eg, social, cultural and spiritual.
- Overall *demand* for energy and goods should be addressed, as well as ethical consideration of the value, end use and purpose of the goods and services we produce. What is the purpose of our all our production? – it should serve the real needs of people, not profit. Demand for raw materials to supply batteries and other equipment for renewable energy may drive other exploitative or environmentally damaging practices. We have seen this in some of our ocean protection work: one of the main proponents of seabed mining in the Pacific is promoting mining of the seafloor as necessary to supply a new generation of electric vehicles and renewable energy, despite the damage to ecosystems that would result.
- New Zealand, along with other developed countries, must significantly increase contributions to international climate finance to assist poor countries and communities. Funding needs to be targeted to the poorest, ensure they have ready access to it, and that they are participate in monitoring and implementation. Climate finance must be additional to overseas aid pledges.
- We need to move to a new or renewed understanding of humans as part of nature, responsible for its protection and wise stewardship. Te Ao Māori’s concept of kaitiakitanga can help all people of Aotearoa New Zealand, but we believe such an understanding is not pervasive through the CCC advice. We consider the overall draft advice is still largely ‘technocratic’ in its response.

# Our response to consultation questions

[Options chosen are indicated as **red, bold and underlined**]

## Our six big issues

Our six big issues - the pace of change

**Big issues question 1. Do you agree that the emissions budgets we have proposed would put Aotearoa on course to meet the 2050 emissions targets?**

Strongly agree - Agree - Neutral - **Disagree** - Strongly disagree - Do not know

Please explain your answer (1000 word limit)

*The 2050 emissions targets need to be strengthened, based on current impacts of climate change; potential severity of future impacts, and the high odds of NOT keeping below 1.5C. We propose New Zealand set a course to achieve net zero emissions across all greenhouse gases by 2040.*

Our six big issues - future generations

**Big issues question 2. Do you agree we have struck a fair balance between requiring the current generation to take action, and leaving future generations to do more work to meet the 2050 target and beyond?**

Strongly agree - Agree - Neutral - **Disagree** - Strongly disagree - Do not know

Please explain your answer (1000 word limit)

*We, as a nation, and globally have already put too much on future generations – both predicted negative impacts and the burden of work to put us back on the right track to a habitable planet. Older members of the present generation have also derived most of the benefits of fossil fuels. The present generation has a responsibility to do as much as it can now.*

Our six big issues - our contribution

**Big issues 3. Do you agree with the changes we have suggested to make the NDC compatible with the 1.5°C goal?**

Strongly agree - Agree - Neutral - Disagree (our changes are too ambitious)- **Disagree (our changes are not ambitious enough)** - Do not know

Please explain your answer (1000 word limit)

*We commend the CCC for focusing on IPCC pathways to the 1.5C goal with little or no overshoot. However, given that these pathways still indicate a 34-50% chance that warming will exceed 1.5°C; and the severe impacts that many coastal and marginalised peoples are **already** experiencing, we need to make our NDC even more ambitious. This recognises New Zealand's historical benefit from fossil fuels, our much-delayed action, and the more immediate impact required for the world's poor.*

Our six big issues - role and type of forests

**Big issues 4. Do you agree with our approach to meet the 2050 target that prioritises growing new native forests to provide a long-term store of carbon?**

Strongly agree - **Agree** - Neutral - Disagree - Strongly disagree - Do not know

Please explain your answer (1000 word limit)

*This represents a good, long-term and holistic view. The CCC should also consider the effectiveness of encouraging restoration or enhancement of degraded native forests and other native ecosystems such as tussocks, wetlands and mangroves.*

Our six big issues - policy priorities to reduce emissions

**Big issues 5. What are the most urgent policy interventions needed to help meet our emissions budgets? (Select all that apply)**

Action to address barriers – **Pricing to influence investments and choices - Investment to spur innovation and system transformation** – None of them

Please explain your answer (1000 word limit)

*On Pricing: Increasing the price of carbon units under the ETS will send the right price signals to all sectors to reduce carbon emissions. It is one of the most important changes that can be made and also the one least likely to lead to unintended consequences across sectors and regions. Pricing should more accurately reflect the social and environmental cost of carbon emissions. Free allocation of units to selected industries should cease as soon as possible, and agriculture needs to be brought into the system as well.*

*On Investment: We suggest congestion charging during peak hours for motorways, and Road User Charges be increased to recover the full cost of diesel or petrol trucks using roads.*

Our six big issues - technology and behaviour change

**Big 6. Do you think our proposed emissions budgets and path to 2035 are both ambitious and achievable considering the potential for future behaviour and technology changes in the next 15 years?**

Strongly agree - **Agree** - Neutral - Disagree - Strongly disagree - Do not know

Please explain your answer (1000 word limit)

*We wish to see stronger action. We believe this is achievable, as are the CCC's budgets and pathways, if more emphasis is placed on education and formation of people in a deeper relationship with the world around them – natural and human. Our relationship with nature, ourselves and other people is out of balance. Less reliance and hope should be placed in 'technology fixes' than attitudinal/behaviour change which is likely to provide longer term, 'embedded' change and less exploitative relationship to natural resources. (eg, over-exploitation of minerals in the search for expanded renewable energy supplies).*

## Detailed questions

### 1. How we developed our advice

Consultation question

1. Do you support the principles we have used to guide our analysis?

**Fully support** - Partially support - Neutral - Do not support - Do not

know Please explain your answer (400 word limit)

*Yes, except in regard to Principle 1 – as noted we seek stronger action by New Zealand to contribute its fair share, including recognition of historical responsibility, to the global effort to keep below 1.5C limit. We also suggest another principle that a transition to other forms of energy or other action to address emissions not further damage the environment or people elsewhere, ie, there must be full respect for true long-term sustainability and protection of human rights in these measures or other forms of production.*

### 2. Emissions budgets numbers

Consultation question

2. Do you support budget recommendation 1? Is there anything we should change and why?

	Too ambitious	About right	Not ambitious enough	Don't know
Emissions budget 1 (2022 – 2025)				X
Emissions budget 2 (2026-2030)				X
Emissions budget 3 (2031-2035)				X

**Please explain your answer (1000 word limit)**

*See our response to 1 and 2 of the Six Big Issues. The Budgets are not ambitious enough, and need to be strengthened, including the first. We need to get onto a downward trajectory as soon as possible, and aim to achieve net zero emissions across all greenhouse gases by 2040.*

## Breakdown of emissions budgets

Consultation question

**3. Do you support our proposed break down of emissions budgets between gross long-lived gases, biogenic methane and carbon removals from forestry? Is there anything we should change, and why?**

Too ambitious

About right

Not ambitious  
enough

Don't know

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Gross long-lived  
gases

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Biogenic methane

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Forestry

**Please explain your answer (1000 word limit)**

*No Comment: We are not qualified to comment on breakdown between different types of gases.*

## 4. Limit on offshore mitigation for emissions budgets and circumstances justifying its use

Consultation question

**4. Do you support budget recommendation 4? Is there anything we should change, and why?**

**Fully support** - Partially support - Neutral - Do not support - Do not

know Please explain your answer (1000 word limit)

*New Zealand needs to clean up its own house with regard to reducing GHG emissions. The international framework for ensuring robust and transparent offshore mitigation is not clear nor strong enough.*

## Enabling an enduring climate transition - intro

### 5. Cross-party support for emissions budget

Consultation question

**5. Do you support enabling recommendation 1 on cross-party support for emissions budgets? Is there anything we should change and why?**

**Fully support** - Partially support - Neutral - Do not support - Do not

know Please explain your answer (1000 word limit)

*We strongly support this recommendation, in keeping with the cross-party support that the Zero Carbon Act gained to establish the processes for climate action. It is in New Zealand's long term interests to reduce our GHG emissions. A cross-party approach to doing so is necessary if we are to have a sustained 30-year programme of action. Such an approach is also necessary if businesses and employees are to have the required certainty to plan ahead and innovate. To achieve this a focus on the common good of all New Zealanders will be necessary.*

## 6. Coordinate efforts to address climate change across Government

Consultation question

**6. Do you support enabling recommendation 2 on coordinating efforts to address climate change across Government? Is there anything we should change and why?**

Fully support - **Partially support** - Neutral - Do not support - Do not

know Please explain your answer (1000 word limit)

*We support coordination to establish policy and strategies that will have impact and effect in the long-term to keep us on track to net zero emissions, and provide consistent guidance and certainty for investment and employment opportunities. Such coordination should be provided through existing government departments.*

## 7. Genuine, active and enduring partnership with iwi/Māori

Consultation question

**7. Do you support enabling recommendation 3 on creating a genuine, active and enduring partnership with iwi/Māori? Is there anything we should change and why?**

**Fully support** - Partially support - Neutral - Do not support - Do not

know Please explain your answer (1000 word limit)

*Caritas and the Catholic Church has benefited from an ongoing and deepening dialogue with Māori to enhance our work, address injustice within Aotearoa and ensure the healing of relationships with the earth and between people. We have witnessed the value of cooperation and coordination between iwi authorities, local and central government and civil society/volunteer organisations in enhancing and restoring environments with the people in mind.*

## 8. Central and local government working in partnership

Consultation question

**8. Do you support enabling recommendation 4 on central and local government working in partnership? Is there anything we should change and why?**

**Fully support** - Partially support - Neutral - Do not support - Do not

know Please explain your answer (1000 word limit)

*See above.*

## 9. Ensuring inclusive and effective consultation, engagement and public participation

Consultation question

**9. Do you support enabling recommendation 5 on establishing processes for incorporating the views of all New Zealanders? Is there anything we should change and why?**

Fully support - Partially support - **Neutral** - Do not support - Do not know

Please explain your answer (1000 word limit)

*We support effective mechanisms to ensure all views and perspectives are authentically heard and considered – especially those of the most vulnerable, those most affected by change, and those whose voices are easily overlooked.*

## 10-11. Locking in net zero

Consultation questions

**10. Do you support our approach to focus on decarbonising sources of long-lived gas emissions where possible? Is there anything we should change and why?**

**Fully support** - Partially support - Neutral - Do not support - Do not

know Please explain your answer (400 word limit)

*Decarbonisation is critical.*

**11. Do you support our approach to focus on growing new native forests to create a long-lived source of carbon removals? Is there anything we should change and why?**

Fully support - **Partially support** - Neutral - Do not support - Do not

know Please explain your answer (400 word limit)

*We should consider a wide range of 'carbon sinks', and the multiple benefits natural systems provide, such as through restoring/enhancing degraded native forests, and protection/restoration of other natural carbon sinks and ecosystems.*

## 12. Our path to 2035

Consultation question

**12. Do you support the overall path that we have proposed to meet the first three budgets? Is there anything we should change and why?**

Fully support - **Partially support** - Neutral - Do not support - Do not

know Please explain your answer (1000 word limit)

*The overall path relies too much on simply changing technology, or behavioural change that just does things differently. Wider matters must be considered, such as overall demand for energy and goods; ethical consideration of the value and end use of goods and services produced; as well as our fundamental attitude and approach to the natural world and resources. See our key concerns.*

## 13. An equitable, inclusive and well-planned climate transition

Consultation question

**13. Do you support the package of recommendations and actions we have proposed to increase the likelihood of an equitable, inclusive and well-planned climate transition? Is there anything we should change, and why?**

Fully support - **Partially support** - Neutral - Do not support - Do not know

Please explain your answer (1000 word limit)

*We support the general approach and direction of recommendations and actions proposed. More needs to be done in accurately assessing and factoring in overall environmental and social impacts of change, especially seeing ancillary benefits of changes in land use, technology or behaviour. In particular, greater attention could be given to localisation: wherever possible, sourcing goods and services locally, thus minimising additional transport and energy use. In a similar vein, more attention could be paid to repurposing or 'refueling' existing infrastructure and facilities with low or no emissions alternatives. For example, we understand the existing natural gas network could be supplied by green hydrogen, and the Huntly power station be converted to a waste-to-energy and green-hydrogen plant.*

## 14. Transport

Consultation question

**14. Do you support the package of recommendations and actions for the transport sector? Is there anything we should change and why?**

Support all the actions - **Support some of the action** - Do not support these actions - Do not know  
- Neutral

Please explain your answer (1000 word limit)

*We support moving freight onto rail and off roads. We also support making public transport more reliable and easier to access. Private road transport operators should also bear more of the externalities of their business operations eg, damage to public roads.*

## 15. Heat, industry and power

Consultation question

**15. Do you support the package of recommendations and actions for the heat, industry and power sectors? Is there anything we should change and why?**

**Support all the actions** - Support some of the actions - Do not support these actions - Do not know  
- Neutral

Please explain your answer (1000 word limit)

## 16. Agriculture

Consultation question

**16. Do you support the package of recommendations and actions for the agriculture sector? Is there anything we should change and why?**

**Support all the actions** - Support some of the actions - Do not support these actions - Do not know  
- Neutral

Please explain your answer (1000 word limit)

*We also want to see faster reduction in agricultural GHG during the first budget period. Reduction of dairy herd numbers and changes to intensification and fertiliser overuse can play a part.*

## 17. Forestry

Consultation question

**17. Do you support the package of recommendations and actions for the forestry sector? Is there anything we should change and why?**

**Support all the actions** - Support some of the actions - Do not support these actions - Do not know  
- Neutral

Please explain your answer (1000 word limit)

*We support increased planting of indigenous forests and new employment opportunities in regional New Zealand.*

## 18. Waste

Consultation question

**18. Do you support the package of recommendations and actions for the waste sector? Is there anything we should change and why?**

Support all the actions - **Support some of the actions** - Do not support these actions - Do not know  
- Neutral

Please explain your answer (1000 word limit)

*New Zealand-based recycling operations (rather than exporting waste) and ensuring contents of “recycling” bins are actually recycled would help restore public confidence and create new employment opportunities.*

## 19. Multi-sector strategy

Consultation question

**19. Do you support the package of recommendations and actions to create a multisector strategy, and is there anything we should change?**

**Support all the actions** - Support some of the actions - Do not support these actions - Do not know  
- Neutral

Please explain your answer (1000 word limit)

*We support the analysis of the siloed nature of government machinery and need for mainstreaming and coordination of climate change action across government departments at page 126 of report.*

## 20. Rules for measuring progress

Consultation question

**20. Do you agree with Budget recommendation 5 on the rules for measuring progress? Is there anything we should change and why?**

Support all the actions - Support some of the actions - Do not support these actions - **Do not know**  
- Neutral

Please explain your answer (1000 word limit)

**[No comment]**

## 21-23. Our Nationally Determined Contribution (NDC)

Consultation question

### 21. Do you support our assessment of the country's NDC? Do you support our NDC recommendation?

Fully support - **Partially support** - Neutral - Do not support (too ambitious) - Do not support (not ambitious enough) - Do not know

Please explain your answer (1000 word limit)

*Our current NDC is grossly inadequate, based on historical emissions and the benefit from fossil fuels that New Zealand as a whole has derived. The strongest consideration in strengthening the NDC should be on effort sharing and equity. As the CCC itself notes – there are a range of methodologies to assess equity, and most of them indicate much stronger emission reductions than are proposed, or currently achievable. However, the government should openly acknowledge what it considers its fair share should be. In that light, it should progressively strengthen our NDC in line with maximum ambition, but considering our national circumstances, the costs of mitigation, and ensuring a just transition for Aotearoa New Zealand which does not further harm the poor here.*

*Our NDC and associated policy should also indicate clearly increased climate finance, technology transfer and other assistance to developing countries, especially in the Pacific, to help them with climate mitigation and adaptation.*

*The concerns of the poor of the Pacific need to be addressed. We want to see education, healthcare and nourishing food and water available to all, and support and encouragement of local leadership which respects the dignity of all in the community. New Zealand government climate finance should be channelled through agencies and partners that have a proven track record of delivering improvements in partnership with local communities. Effective monitoring and evaluation of climate finance investment, including the participation of target communities, will be key to maintaining the confidence of donor countries.*

### 22. Do you support our recommendations on the form of the NDC?

**Support** - Somewhat support - Do not support (too ambitious) - Do not support (not ambitious enough) - Do not know

Please explain your answer (400 word limit)

*New Zealand needs to meet current international expectations that a developed country's NDC should be an all-sector, all-gas absolute emission reduction target. Though recognition of the different nature and longevity of methane in the atmosphere needs to be recognised, New Zealand has for too long used its high agricultural emissions as an excuse for limited action.*

### 23. Do you support our recommendations on reporting on and meeting the NDC? Is there anything we should change, and why?

Support - **Somewhat support** - Do not support (too ambitious) - Do not support (not ambitious enough) - Do not know

Please explain your answer (400 word limit)

*We support the intent of the recommendations, with a caution around offshore mitigation, until the international framework for ensuring robust and transparent offshore mitigation is clear.*