

**SUBMISSION
NUMBER**

7

Sharon Bennett

From: Bryan Smith
Sent: Monday, 22 November 2010 10:32 a.m.
To: Sharon Bennett
Subject: FW: Draft Carbon Management Policy

Follow Up Flag: Follow up
Flag Status: Red

-----Original Message-----

From: mcDONewt@yahoo.co.nz [mailto:mcDONewt@yahoo.co.nz]
Sent: Monday, November 22, 2010 10:13 AM
To: Bryan Smith
Subject: Draft Carbon Management Policy

The following details have been submitted from the Draft Carbon Management Policy form on the www.Wellington.govt.nz website:

First Name: Don S.
Last Name: McDonald
Street Address: F63/3 Hutchison Rd
Suburb: Newtown
City: Wellington
Phone: 02 77 845 900.
Email: mcDONewt@yahoo.co.nz

I would like to make an oral submission in November: Yes

I am making this submission: as an individual

Your thoughts on the objectives proposed for the Draft Carbon Management Policy: 18° C is warm enough. donate \$100 room thermometers to WCC HSG Apts.

Your thoughts / views on Council's proposals for managing landfill liabilities: reuse plastic shopping bags. not turn to dust rot in 4weeks. store photos and documents. what is worse 1000 kg SUV or 3 gm shopping bag.

Your thoughts / views on Council's proposal that any revenue from the sales of forestry credits not be designated for climate change projects: how can i printout study this submission. please.?



Any other comments: student essay ideas climate pride conserve heater.
18°C therm is warm enuf

church pray
100watt incandescent bulb.
fwd bcc;; how confidential is it? pardon.

dear editor, maria,

Thank You
Best wishes paula, apology last night mtg..

is this important to planet.
suggest write in simpler style. communication.

govt. lot of people do not understand the subject line.

wonder how many flood of submissions, not great lots. few?

thank you regdsm, 18/11/2010.

pike river mine disaster Greymouth S Is. 27 miners trapped. reduce appetite for coal and oil and gas
etc.

is your trip really necessary.
turn off htr 15 minutes before leaving. heater. should it be on in the first place? Monday 22 Nov
2010..

c/o Bryan Smith, Principal Advisor, Policy
WCC, 101 Wakefield St
email: carbon.policy@wcc.govt.nz

**SUBMISSION
NUMBER**

12

10 Laurent Place
Kingston
Wellington

24th November 2010
tel 043898071

email:mgtaylor@kol.co.nz

Draft Carbon Management Policy

Dear Councillors,

Below is my individual submission on the Council's Draft Carbon Management Policy. I have worked in central Wellington and been a Wellington resident and ratepayer for over thirty years. My interests include outdoor recreation, conservation and the environment My submission is based on the PDF version of "DRAFT 2010 Carbon Management Policy October 2010" from the www.wcc.govt website and uses the page numbers in that. I refer to the draft carbon management policy, or, where the context so implies, to the carbon management policy that will be adopted by WCC after the consultation as "the Policy". I wish to be heard in support of my written submission and ask to be contacted that that may be arranged.

Yours faithfully,

Michael Taylor

51

Overall comments

- (a) I recognise that in overall budgetary terms the Policy has a fairly minor effect and agree that that means it would be counterproductive for WCC to put many staff or much effort into that aspect. However, the Policy must operate in the context of Council's wider commitments for climate change and carbon neutrality. So it is important that actions under the Policy be principled and consistent with those and not driven solely by financial considerations.
- (b) It is the banks, trading exchanges and speculators that profit most from the trading of financial instruments, and, as recently shown, through their actions can create worldwide crisis only to be bailed out by governments impoverishing the ordinary people. Trading in carbon instruments is likely to be similar. Therefore I strongly support that WCC not be a significant trader nor a speculator. It should further take steps to minimise its need to participate in the "carbon market" by trying to minimise its emissions and offset any balance internally (e.g. through planting permanent native forest).

Main points

- (c) Page 3 – introduction:
I agree that the Policy is a sub-set of the Council's wider Climate Change Action Plan. It should be stated that the Policy must be consistent with that plan and a carbon neutral Wellington.
- (d) Page 3 – objective 1:
The wording, "a framework to aid", gives too little status to the Policy. I ask that it be made much stronger. It should be a requirement that all WCC "carbon management" be consistent with the Policy and obey any "rules" in the Policy. I ask that the Policy state that any deviation from that must be specifically authorised by Council resolution.
- (e) Page 4 – Conservative approach:
I very strongly support all the points made here. For certainty I ask that "does not intend to" be replaced by "will not". That would also be consistent with the earlier "the Council will adopt" and the immediately following "Nor will the Council take"
- (f) Page 4 – Buy units locally where this is competitive
I strongly support purchasing local units. However, I note that the qualification of that differs not only between the heading and content here "where this is *competitive*" and "will not pay *significantly over* market rates" but also from that under the next heading "where local units are [unqualified] *above* market rates" and from the wording on page 10 "purchases will not be at a price that is *materially above* market rates". The deliberate use of different phrases implies different intents or meanings, but just what is not clear. For certainty and clarity I ask the Policy state some specific maximum amount above "market rate" – for example "no more than 15% or \$1,000 (per purchase), whichever is the higher".
- (g) Page 4 - Acquire least-cost units & Page 9 - Managing the Council's forest assets and liabilities:
If the Government sets lower standards under its ETS for the characteristics of carbon units than for those of the carbon units (credits) generated from council's own activities, it would be unacceptable for Council to try to profit from that situation (e.g. by selling its own at a higher price than those it buys to cover its own emissions). Although it might be legal, it would be unethical – indeed it would literally be applying a double standard. Although financially driven, the Policy cannot ignore ethics and I ask that it include a provision to prevent that. Perhaps simply it should require the first application of any council activity generated credits be to offset directly its own liabilities.

This also means I oppose page 9's "The Council will seek to optimise its returns from units generated from post-1989 forests. This may mean the Council will sell such units on the open market (as opposed to using them to cover its own landfill liabilities), where the Council can receive a premium for those units". I ask the Policy not allow that.

- (h) Page 4 - investigate opportunities for economies of scale in the purchase and sale of units
I support this provided it does not conflict in with Council's climate change policy or anything elsewhere in this Policy and (consistent with my (b)) provided that all participants in such collaboration are local/regional/central government bodies or other not for profit organisations. I ask the Policy state that and that "generally" be deleted form the last sentence here.
- (i) Page 4 - Consider overall economic efficiency – not just the Council's direct costs:
I support this but ask it be widened by deleting "economic" (twice). That would also be consistent with the page 5 statement that Council will take a broader view of benefits.
- (j) Page 4 - 'No regrets' decisions where possible:
In any consideration of a scenario where greenhouse gas emissions are not priced at all (including the page 5 "a carbon price of zero in the mid-term"), Council climate change and carbon neutral commitments must still be retained and honoured.

Responses on items in the website form submission

- (k) The Council's proposals for managing landfill liabilities, including full cost recovery by way of fees:
I totally support full cost recovery. Furthermore that cost should include the full cost of all risk management and recovery – of any advance steps (e.g. early purchase of carbon credits) and of any retrospective cost (meeting any shortfall in carbon credits or their cost compared with the charge). Note that is not the only cost that landfill charges must meet (e.g. they must meet all operational costs including those of recycling services) and does not preclude additional charges, beyond cost, being made to further discourage such harmful activities (production and disposal of waste).
- (l) The Council's proposals for managing forest assets and liabilities:
I fully support increasing PFSI forests by planting more permanent native forest. I'm uncertain just what council activity would result in deforestation without replanting. For example the comparatively recent deforestation of large parts of Tinakori Hill (regarded as a health/safety measure) was followed by planting and so would presumably not be a pre-1990 forest deforestation liability. Thus it is not clear (from page 9), at least to me, how deforestation (without replanting) would be "a new initiative under the Draft Annual Plan process". I would strongly oppose such deforestation and ask that that provision be deleted from the Policy. Deforestation could surely only be considered if it were part of some "project" and so covered by "included in the costs of a project to which the proposed deforestation relates". In such a situation the project would firstly, simply for environmental and recreational opportunity considerations, be expected to provide or create an alternative area of forested land for Wellington and Wellingtonians. If, through the operation of the ETS, that did not itself offset the carbon liability the cost of that liability should certainly be part of the project cost.
- (m) The proposal that any revenue from the sales of forestry credits not be designated for climate change projects:
Although it may be an issue over interpretation of "designate" which might be resolved through appropriate reporting and offsetting, until and unless that can be shown, I oppose this part of the Policy and ask it be changed. Such revenue should be even more specifically "designated" to be for measures to reduce (ideally avoid) climate change and exclude measures to mitigate or remedy the

effects of climate change. Otherwise it would result in the cost of activities to reduce climate change being artificially represented as higher than they actually are. It is vital that the cost of reducing climate change be very clear and able to be compared directly and easily with the forecast cost of climate change. Only that allows people to be informed and consequently make appropriate choices.

Additional points

(n) Page 3

In "3 to indentify opportunities to minimise liabilities and/or ..." "indentify" should be "identify".

(o) Page 3 – scope and application:

To the extent that the Policy as drafted is very much a financial one it is not unreasonable that CCOs' carbon management might be allowed to differ. However, they should not be allowed to speculate (trade beyond their direct need). What is even more important is that their management be consistent with Council's broader climate change policy.

(p) Page 5 - Carbon price assumptions:

The wording of the Policy appears to anticipate that central government (through the Treasury) may stop publishing its carbon price calculations and forecasts. If that is not the intended meaning I ask that the Policy wording be clarified. If it is, Council should be making strong representations to central government to oppose that. It is bad enough that central government has imposed the need for, and so cost of, "carbon management" on regional and local government, without it subsequently failing to supply that information.

(q) Page 7 - fee setting:

I support fee setting based on appropriate forecasting, but those fees must take into account the risk of variation from forecast, if necessarily retrospectively (i.e. any under recovery in one year should be made good by increasing those charges in the next)

(r) Page 10 - Purchasing and trading strategies vs Page 4 - Key Principles, Conservative approach

I agree that "the Council does not have a major strategic exposure to carbon pricing nor does it have core competencies in this area" and strongly support that Council should not "become a major carbon trader nor a speculator on future prices on carbon. Nor will the Council take aggressively short or long positions on emission units relative to its liabilities". However, the wording on Page 10, "The Council will develop an appropriate level of expertise, and take expert advice as required, on the acquisition and sale of emission units, including addressing the following key issues: ...", could be interpreted to as allowing Council to go significantly beyond the limits of that key principle and I oppose that. I ask that the Policy page 10 wording be revised to eliminate any such possible interpretation.

There are a number of areas of particular focus contained in the draft policy. What are your thoughts/views on:

The Council's proposals for managing landfill liabilities, including full cost recovery by way of fees

B/ LETS LOOK AT WHERE THE WASTE
COMES FROM - IE New World Plastic Bags
and cows.

The Council's proposals for managing forest assets and liabilities

GET REAL!

The proposal that any revenue from the sales of forestry credits not be designated for climate change projects

I DISAGREE.

Fold here

Do you have any other comments on the other aspects of the Draft Policy?

YES - HEAPS

I WILL ATTEND AND

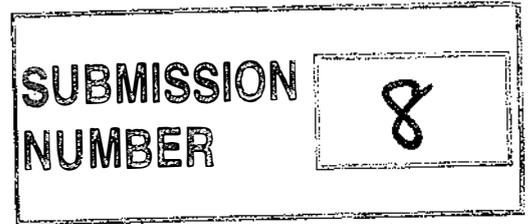
TABLE A FULL

DISCUSSION DOCUMENT

YES - AND GARY POULT SHOULD FALL
ON HIS SWORD AND RESIGN.

Fold here





**Submission on Wellington City Council Draft Carbon
Management Policy**

2010

From

**Cycle Aware Wellington
A non-profit citizen group**

Contact Information:

Cycle Aware Wellington
PO Box 11-964
Wellington
www.caw.org.nz
email: info@caw.org.nz; cc: nicgaston@gmail.com
Phone/fax contact: 02102799624
Contact person: Nicola Gaston

Who is Cycle Aware Wellington?

8 We are a voluntary, not-for-profit organisation aimed at improving conditions for existing cyclists and encourage more people to bike more often. We are the local advocacy group for cyclists who use their bikes as a means of transport. Since our inception in 1994, we have worked constructively with Wellington City Council on a wide variety of projects, including

- Bike to Work Day and other cycling promotion events
- Safety and bike skills training for police officers, adults and children
- working with the transport sector to improve safety for cyclists in Wellington City

Summary

Cycle Aware Wellington would like to commend the City Council on their acknowledgement of the challenges arising from the introduction of the NZETS. Any reduction in carbon emissions will require something more than a business-as-usual approach, and moving people out of their cars and on to bicycles and public transport is one of the easiest transformational goals for the council to achieve, with suitable targeted investment.

Mode share

17% of residents currently cycle, walk, or run to work. This is great! However, given the compact geography of the Wellington CBD, we believe that these numbers, particularly of cyclists, can be further increased. Provision of bicycle parking, advance stop boxes, and marked cycle lanes are great ways of increasing the visibility of cycling and getting people onto their bikes.

Benefits of cycling

While increases in cycling in Wellington contribute to lower transport-related emissions, we would be the first to acknowledge that reasons to cycle are manifold, ranging from health benefits (and associated cost savings), to lessening of congestion on our roads, and generally an increased quality of life for the city's residents.

We support:

The overarching principles of the policy. A conservative approach is justified as far as carbon trading goes - however, it should be noted that Council policies, particularly its transport policies, will have a significant impact on emissions. While the price of carbon in the ETS may change, and may even be nominally zero, the actual price of carbon is never zero, and all reasonable efforts to reduce carbon emissions should be made. We appreciate that *“the Council should consider the overall economic interests of Wellingtonians when making decisions, even though this may mean investing in new technologies rather than simply passing on cost increases by way of rates or fees”*.

Much of council core business, in managing roads, public transport and public spaces throughout Wellington, can be better brought in line with the goal of improving living standards and the economic interests of residents. In particular, the improvement of cycling facilities and the public transport network, including the introduction of light rail, are key goals that the council should be working towards that cannot be managed by individuals or other organisations.

We oppose:

The status quo - although we acknowledge that progress is being made. We hope that the council puts into action its commitments to improve cycling facilities on Thorndon Quay, Aotea Quay, the Great Harbour Way, and the rollout of more low speed limit areas, etc. We also support plans for significant investment in a modern public transport network.

Thank you for the opportunity to provide our opinions and ideas on the 2010 draft Carbon Management Policy. We would like to present this submission in person.

SUBMISSION ON DRAFT 2010 CARBON MANAGEMENT POLICY

I am making a submission

As an individual

On behalf of an organisation: *Forest & Bird, Wellington Branch*

I would like to make an oral submission

Enter your contact details



Mr/Mrs/Ms/Miss/Dr

First name

Peter

Last name

Hunt

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Introduction

This submission is made on behalf of the Wellington Branch of Forest & Bird.

Forest & Bird is New Zealand's largest independent conservation organisation, with over 30,000 members. There are currently over 1,600 memberships in Wellington City.

Forest & Bird would like to thank the Council for the opportunity to submit on this document.

Summary

We consider that there are basic flaws with the New Zealand Emissions Trading Scheme (NZETS), which are a direct result of poor legislation by government. This is reflected in the way the Wellington City Council (WCC) is approaching decision-making, in what is described as an "uncertain environment".

However, we strongly encourage WCC to take steps to build in its own safeguards to overcome the weaknesses of the scheme and achieve the best outcome for Wellingtonians. Decision-making should not just be based on the community's economic interests, but also on the ecological and social values that need to be championed if we are to see a reduction in climate pollution.

Critique

Separation from the Climate Change Action Plan

The draft states that it is “a sub-set of the Council’s wider Climate Change Action Plan” (page 3), but that “it does not address mitigation of climate change or adaption to climate change directly, as these issues are covered under the action plan”.

We feel it is unreasonable for WCC to isolate this carbon policy from the overall Climate Change Action Plan. By choosing to isolate the framework for assessing costs and benefits of decisions based on the NZETS, it appears that WCC is attempting to remove issues of mitigation and adaptation from the discussion — yet the NZETS is meant to be the primary mechanism, or “key measure”, for responding to climate change.

We believe a further key objective should be included in the policy:

“4. to determine how implementing the NZETS can create opportunity for mitigation and adaptation to climate change”

“No regrets” decisions where possible

In general we approve of a conservative approach to the management of WCC’s financial responsibilities. However, in the light of the urgency of the carbon pollution issue a conservative approach is not what an NZETS scheme should foster.

Carbon pricing

Planning a response to the NZETS on model outcomes based on a zero carbon cost scenario is a poor economic bottom line approach. Granted, being financially responsible is prudent, when investment risks are high. But is reducing carbon pollution a high-risk financial decision? It is quite unlikely that the cost of carbon will ever again be zero. Indeed, everything points to an overall trend of a relentlessly upward cost rise, nationally and internationally. Using a short-term fluctuation in the price of carbon to justify the consideration of a future zero carbon price is a very high-risk approach.

The beginning of a rise in carbon pollution costs should signal the need for rapid early investment into long-term carbon reduction policies. Avoiding proactive urgent policy to transition Wellington into an era of clean technology, and not protecting or restoring all remaining indigenous forests, will only have ratepayers facing mounting future costs as the impacts of climate change become more expensive and complex.

Despite the government delivering a weakened NZETS scheme, and despite the possibility that the scheme may be changed if the government changes again — it is clear that New Zealand must meet its 2008–2012 obligations under the Kyoto Protocol and any obligations the country may undertake as part of a successor agreement. These obligations will only continue (and increase) under international pressure. “Investing in technologies to reduce emissions” (page 5) is one commendable approach by the WCC, which we strongly support.

Including the environmental cost

However, we are disappointed to see there is no environmental cost included in the NZETS accounting. We would like to see the set of principles on page 4 enhanced to include social and environmental obligations, in line with a triple bottom line accounting practice.

Without this amendment, the accounting policy is a disappointing “business as usual” approach, which cannot continue to be used when we are dealing with such serious issues and their profound long-term effects. WCC must, at a minimum, use triple bottom line accounting; even better would be to add a cultural, ethical and moral perspective — the so-called “quadruple bottom line”. An comprehensive bottom line approach would take advantage of all the opportunities that the scheme presents for transitioning the Wellington community towards a carbon-neutral, sustainable city.

We also wish to be clear that if the degree of uncertainty over carbon prices creates a lack of confidence, it is based on a flawed economic rationale (and perhaps a flawed NZETS). There is no longer any uncertainty in the impending climate change of 2°C (or more). If urgent responses under the NZETS do not effectively curtail rising carbon emissions, New Zealand will incur unthinkable national and international consequences.

We are concerned that under an unlimited trade scenario, where credits can be purchased from international arena, the ecological/carbon value of a native forest (or, for that matter, any carbon sink) has been “lost” because of a flaw in the operation of the trading scheme itself. This creates a distortion in the cost-benefit analysis, to the detriment of the indigenous forest and its inhabitants. This is relevant when considering the economics of flooding native forests or of reforestation projects.

Intergovernmental Panel on Climate Change (IPCC) Synthesis Report

There is high agreement and much evidence that with current climate change mitigation policies and related sustainable development practices, global greenhouse gas (GHG) emissions will continue to grow over the next few decades.

“The IPCC Special Report on Emissions Scenarios (SRES, 2000) projects an increase of global GHG emissions by 25 to 90% (CO₂ equivalent) between 2000 and 2030 ... with fossil fuels maintaining their dominant position in the global energy mix to 2030 and beyond. More recent scenarios without additional emissions mitigation are comparable in range.

“Continued GHG emissions at or above current rates would cause further warming and induce many changes in the global climate system during the 21st century that would very likely be larger than those observed during the 20th century.”¹

Managing WCC's forest assets and liabilities

Under the discussion of Pre-1989 and Post-1990 forests in the draft policy, the discussion and approach predominately covers exotic forest. We feel there is insufficient emphasis placed on the value of indigenous forest. Although it is noted that:

“Where pre-1990 forests are harvested, it is expected that the affected areas will either be replanted or regenerated into a different forest type, such as indigenous forest” (page 9)

we would like to see an additional section dedicated to native forest, and the proposed manner in which NZETS would apply to these assets.

¹ www.ipcc.ch/publications_and_data/ar4/syr/en/spms3.html

Recognising the value of indigenous forest

One critical initiative when planning to reduce carbon pollution is to preserve our remaining old growth forests and restore further land back to indigenous forest. WCC has an opportunity not only to provide a permanent carbon sink and become carbon neutral, but it also has the potential to boost its economic value by establishing a net carbon credit through a policy and process of reforestation of permanent native forest.

Currently around 10% of the city (2,500 hectares) is being managed as (or is reverting back to) native forest. WCC staff — assisted by about 60 volunteer groups — plant up to 100,000 trees and shrubs annually. However, this is a cash-starved operation that relies heavily on the volunteer sector and lacks the financial commitment to be able to get on top of both our pest and weed problems. The city needs to cease eating into green space through District Plan change approvals and to focus on restoring our green infrastructure.

We would also expect WCC to take advantage of the potential economic value of its green belt (inner and outer) rebuilding programme which, over time, will accrue economic value through future NZETS legislative improvements; not as an objective of the programme, but as an additional benefit. We are concerned that with a low value placed on “emissions” from harvesting our indigenous forests, they will not have high enough economic value under the NZETS accounting regime to warrant protection.

In its description of the Permanent Forest Sink Initiative (PFSI)², the MAF website notes, regarding pre-1990 forests:

“Some exemptions from deforestation liability are possible for less than 2ha (of total pre-1990 forest land), or for weed control purposes (upon application). In addition, owners of less than 50ha of forest may lodge an application for exemption from the NZETS provisions.”

We commend WCC's wider policy objective of establishing indigenous forest on private land. However this does not bode well for native forest remnants — or the express intention for WCC to encourage forest regeneration on private land. We would like to know how WCC plans to incentivise this forest regeneration.

Weed and animal pest reduction

The draft policy states that:

“Any new initiatives identified to increase carbon sequestration, such as control of browsing animals or enhancement planting, will be considered by the Council along with all other new initiative proposals” (page 8)

Studies overseas have shown that significantly improved flora growth does occur when pests are reduced, with a consequential significant increase in the sequestration. The Department of Conservation is already working on the assumption that similar effects will be observed in New Zealand. We recommend giving a higher priority to funding pest and weed reduction.

Final Recommendations

We recognise that a price on carbon, whether through an ETS or carbon tax, will not on its own achieve the emissions reductions needed to meet the international promises we have already made, and those we will need to make in future. In fact it is well acknowledged by Nick Smith, Minister for Climate Change Issues, that the current ETS will at most only stop emissions from increasing, not reduce them.

² www.maf.govt.nz/forestry/pfsi

The big areas of energy use in Wellington are buildings, land transport and aviation. A range of complementary policies, in addition to carbon sequestration, is urgently required.

A non-exhaustive list of recommendations includes:

- Pursuing the indirect effect of the ETS to develop renewable energy on council owned land. We commend WCC for its initiative in partnering with the European Marine Energy Centre and its plan to extract energy from waste. However we also recommend that WCC change the District Plan to:
 - facilitate the installation of micro-turbines in the city (subject to bylaws)
 - allow large-scale commercial wind farming in rural areas (subject to visual and noise constraints)
 - facilitate the installation of the land-based infrastructure that would be necessary for tidal and wave power generation in Cook Strait
 - explore the potential of facilitating a feed-in tariff system to encourage the generation of local renewable energy projects, which would undoubtedly receive strong support and investment from local stakeholders
 - encourage the efficient use of solar energy — not harnessing free energy to reduce fossil fuel energy use seems wilfully wasteful. A \$300 grant to cover building consent costs for households that install sustainable energy features is commendable, but not significant in terms of the overall cost of purchase and insulation.
- All suburban design should include significant space for the production of fresh food and recreation. Growing local spray-free food to supplement people's diet has numerous environmental, social and health benefits.
- Wellington roads are near to capacity every morning and every evening as people commute daily to work. We need greater investment in public transport — upgrading services to a standard comparable with the best European cities of a similar population.
- Introduce much needed vehicle fuel economy standards to improve the efficiency of cars and trucks in New Zealand — and strong promotion of electric vehicles.
- One of the most cost-effective ways to quickly reduce greenhouse emissions is to improve the energy efficiency of buildings. Incentivise this! People want to save money on energy bills. Consider a rates discount for householders who install energy saving devices. The Home Energy Saving Program (initiative BE1 in the WCC Climate Change Action Plan) is a start but needs to be extended to include water storage, grey water recycling, and composting toilets where suitable, and double-glazing of windows.