30 June 2022

Environment Select Committee
Parliament Buildings
Wellington

DCC SUBMISSION ON TE HAU MĀROHI KI ANAMATA – TOWARDS A PRODUCTIVE, SUSTAINABLE, AND INCLUSIVE ECONOMY: AOTEAROA NEW ZEALAND'S EMISSIONS REDUCTION PLAN

Background

1. The Dunedin City Council (DCC) thanks the Environment Select Committee for the opportunity to comment on Te Hau Mārohi ki Anamata – Towards a productive, sustainable, and inclusive economy: Aotearoa New Zealand's Emissions Reduction Plan (the ERP). The DCC would welcome the opportunity to appear before the Committee to elaborate on points made in this submission or answer questions.

2. The DCC supports the Government's aim of achieving a carbon neutral future and a strong low emissions economy, and the ambition to engage all sectors in pursuit of these objectives.

3. The DCC has been progressing work on climate change mitigation and adaptation since 2009. Having a high degree of exposure to sea level rise, Dunedin is particularly aware of the consequences of inaction on emissions reduction.

4. In June 2019, the DCC declared a climate emergency, and brought forward the DCC's city-wide net carbon neutrality target by 20 years, adopting a two-part emissions reduction target ('Zero Carbon 2030') as follows:

    - net zero emissions of all greenhouse gases other than biogenic methane by 2030; and

    - 24% to 47% reduction below 2017 biogenic methane emissions by 2050, including 10% reduction below 2017 biogenic methane emissions by 2030.

Submission

Overall comments

5. Achieving significant reductions in gross emissions in line with Government targets will require significant change at the national and local level. It will require all of government's levers to be utilised, and all policy tools to be well-aligned. A high degree of collaboration and partnership between all government sectors is necessary due to the degree and speed of change required.

6. In 2021, the DCC made a submission on the Ministry for the Environment's Emissions Reduction Plan discussion document. The DCC appreciates the work that has happened since that consultation and notes that many of the points made in that submission have been incorporated into the ERP, some of which are highlighted in this submission.

7. The DCC welcomes the acknowledgment in the ERP of the pivotal role local authorities play in achieving the government's emissions reduction goal. However, in some areas, there is a lack of specificity as to exactly how that will be implemented.

8. In this submission the DCC highlights key areas where local authorities, such as the DCC, could assist in implementation efforts by piloting initiatives alongside central government and by expanding existing initiatives, as well as suggestions for additional interventions the government could make to help reduce emissions. This submission largely comments on key chapters of transport, energy, planning, and waste, with reference to the following areas of focus of the Select Committee's inquiry in mind:

    - What tools or initiatives would help implement the key actions in the Emissions Reduction Plan and why?

    - Are there other key actions which can better achieve the emissions budgets than those in the Emissions Reduction Plan, what are they, and why are they more likely to succeed?

    - What type of monitoring and reporting would enable you to be confident that the key actions in the Emissions Reduction Plan are being implemented, and that emissions are falling in line with the emissions budgets? Please state reasons.

Empowering Māori

9. The DCC notes that Māori will be uniquely affected by climate change and welcomes the approach in the ERP that aims to embody Te Tiriti o Waitangi and recognise the value of mātauranga Māori in Aotearoa's transition to a climate-resilient society.

10. The DCC supports the actions listed to support partnership, participation, protection and equity for Māori. The DCC suggests that these actions (particularly those that aim to facilitate partnership such as a 'platform for Māori action' and 'establishing mechanisms for effective engagement') should be embedded across the entire government response to climate change and guide the development of other actions where details are yet to be finalised.

An Equitable Transition

11. The DCC agrees with the equitable transition objectives listed in the ERP. However, the DCC considers that there should be strengthened support for low-income households affected by climate change.

12. The DCC suggests that the government can further support households to reduce their emissions by supporting councils to make urban areas connected by public and active transport and providing spaces for communities to meet and connect. The government could also support households by focussing on energy efficiency of buildings (for example, through the Building Code, rental property regulations and expanded EECA programmes). Increasing standards for energy efficiency beyond households could also help to drive emissions reduction in Aotearoa.

13. The DCC supports the actions in the ERP to enable informed public participation and suggests that the government could further support people impacted by the transition by (i) providing access to clear, simple, valued-based communications provided in multiple languages and methods, and (ii) working with sector, ethnic and place-based groups who know communities best.

Behaviour Change – Empowering Action

14. The DCC commends an approach to the transition that promotes public awareness, communication, education, and systemic change. Bringing communities along on the transition journey will be vital for achieving effective climate action. The government could work with local government to better understand potential barriers and/or inequities from proposed emissions reduction actions, as well as local perspectives and aspirations. Any national action plan needs to consider how national policies will translate into local action.

15. Due to their existing relationships with local communities, local authorities and their community partners are well-placed to undertake behaviour change programmes. The DCC submits that providing local authorities with funding and a mandate for behaviour change programmes may be a complementary or alternative approach to establishing a lead government agency. For example, the DCC fund and/or directly provide services supporting behaviour change in areas such as sustainable transport, waste minimisation, and conservation. Several programmes (particularly those offered to schools) are oversubscribed and unable to meet current levels of demand due to resourcing shortfalls.

16. As noted above, the DCC submits that local authorities with ambitious climate targets are well-placed to partner with central government to deliver climate action or pilot initiatives.

Government Accountability and Coordination

17. The DCC submits that to enable the success of the ERP, it would be valuable to amend relevant legislation to ensure the government agencies and local governments are required to (and have a mandate to) give effect to the final Emissions Reduction Plan, and associated targets, when undertaking their functions.

18. For example, the DCC notes the ERP intends to require both Regional Land Transport Plans and plans under the Resource Management Act to assess how those plans affect transport related emissions and help achieve mode-shift. This could be strengthened by requiring these plans to give effect to the emissions reduction targets and the overall emissions budgets. Amending the purpose of the Land Transport Management Act to include provision for creating a low emissions transport system would help to achieve the outcomes desired in the ERP. Other key pieces of legislation such as the Natural and Built Environments Act that are under development should have similar strong alignment and regulatory tools available so local authorities can help ensure emissions reduction targets are met.

19. As noted in the 'Principles for the Transition' section, the DCC notes the ERP mentions the need for local and central government to work together yet lacks detail on how that will be actioned. The DCC would welcome opportunities to partner with central government to realise emissions reductions, or trial emissions reduction actions at a local scale.

20. Many local authorities are undertaking research, policy work, and action on climate change. In general, the challenges faced by local authorities are similar. Currently councils are working together as much as possible themselves to overcome these challenges, but the government could facilitate faster and more consistent progress on climate change by providing guidance in the following areas:

    - A standardised methodology and data sets for calculating region- or district-wide emissions and setting emissions reduction targets at these scales. To help enable this, any data that is collected and aggregated nationally, should also be available in a disaggregated scale to at least a territorial authority level wherever possible.

- processes for building climate change considerations into decision-making, including procurement and business cases (for example, shadow emissions values)

- a standardised methodology for estimating the emissions impact of planning decisions

- a standardised methodology (including emissions data for materials) for estimating embodied emissions

- standardised assumptions relating to transport emissions (uptake of EVs and other alternative fuel sources).

Funding and Financing

21. The DCC welcomes greater funding for emissions reduction through the annual Budget process and revenue recycling from the New Zealand Emissions Trading Scheme.

22. The DCC submits that additional funding at the local level will be required to make the necessary progress on emissions reductions. Local government and community groups are often well-placed to deliver trusted local services and solutions, but access to sufficient capital to establish services can be a significant challenge. For example, community-run resource recovery centres have been shown to be very effective in promoting waste diversion, but the capital outlay required to establish these is substantial.

23. The DCC welcomes the support in the ERP for research, science, innovation and technology, and acknowledgement of the valuable role that universities and polytechnics play in helping to achieve the country's emission reduction goals. The DCC submits that tertiary education providers be funded to enable them to provide expert advice and assistance on climate-related and emission reduction projects for councils around the country.

24. In addition, the DCC submits that all existing central government funding mechanisms should be aligned with climate-related ambitions.

Emissions Pricing

25. The Treasury's current CBAx Tool User Guidance states that shadow emissions values are recommended for use in central government and may not reflect abatement costs for local government.

26. The DCC submits that data and guidance on projected abatement costs for those outside of central government is a key mechanism to help facilitate and coordinate climate action in local communities and the private sector. These projections would enable climate change ambitions to be built into decision-making in a robust and consistent manner.

Planning

27. The DCC supports the actions to improve integration of transport planning and land use planning through the resource management reform, however, remains concerned that current Resource Management (RM) reform processes may reduce the ability of the planning system to promote emissions reductions. In particular, the current exposure draft of the Natural and Built Environments Bill will likely undermine the ability to direct growth to where there are sustainable transportation options.

28. The DCC submits that the best way to achieve emissions reductions in the planning system is to promote good urban form and design. This is the approach taken in Dunedin's Second Generation District Plan (2GP) and Spatial Plan.

29. The ERP notes that a methodology is needed to measure the emissions associated with urban development decisions. The DCC agrees with this and urges central government to undertake this in partnership with local government. Any methodology should incorporate the likely lifetime emissions of transport and energy use that would be enabled under different scenarios, as well as embodied emissions in buildings and infrastructure.

30. The ERP also sets out a proposal for government to require transport emissions impact assessments to be factored into planning decisions. The DCC supports this in principle. However, local government will require support to do so, including tools to undertake consistent and cost-effective assessments. The development of tools and assumptions should occur in partnership with local government.

31. The ERP states an aim to promote urban intensification, support low-emissions land uses and concentrate intensification around public transport and walkable neighbourhoods. There are several methods to help achieve these outcomes:

    - remove aspects of the RM reform that undermine this agenda, while retaining aspects such as the Strategic Spatial Plans which will promote it

    - require public transportation through Regional Land Transport Plans to respond to land use planning (growth areas identified in District Plans) ahead of Strategic Spatial Plans. Dunedin has some greenfield areas that could easily be serviced by public transportation, but remain un-serviced despite being nearly fully developed.

    - consider unintended consequences of changes to regulations. For example, changes to increase the height of buildings in lower latitudes, enabled through the proposed RM bill, will have significant adverse effects on the environmental performance of existing (often poorly insulated) housing, leading to higher energy costs due to loss of solar access.

Accelerating the decarbonisation of the transport sector

Transport Focus Area 1 – reducing reliance on cars and support people to walk cycle and use public transport

32. The transport sector is Dunedin's largest and fastest growing source of emissions. Investment in reducing transport sector emissions is therefore key for achieving significant emissions reductions in Dunedin. The DCC agrees with the Government's assessment that urgent wholesale changes across the transport system are required. The DCC welcomes many of the measures in the ERP and submits that more urgent action than that set out in the ERP will be needed.

33. The DCC supports the adoption of a target focused on reducing vehicle kilometres travelled (VKT) by cars and light vehicles and welcomes the development of sub-national VKT reduction targets. The DCC encourages engagement with local government in setting these and supporting their implementation. Noting the DCC's higher level of ambition around emissions reduction, and the co-benefits associated with improved public and active transport, the DCC would support a higher ambition VKT reduction target than the 20% by 2035 proposed.

34. In the roll out of the VKT reduction planning the DCC notes that the main urban growth areas of Auckland, Hamilton, Tauranga, Wellington, Queenstown and Christchurch are set to have programmes produced by the end of 2023, with other

key urban areas (including Dunedin) by the end of 2024. In order to achieve Dunedin's ambitious emissions reduction targets, and to align with the transport programmes underway in the city to assist in reducing VKT, the DCC submits that we should be considered as a 'Tier 1 Council' for this purpose and be supported to have a VKT reduction programme developed by the end of 2023.

35. The DCC submits that to enable an effective and swift transition, change on the ground in other communities to enable faster uptake of low carbon active modes of transport must occur earlier than is currently proposed. In recent years the DCC has undertaken several investments to encourage active and public transport, such as the development of the Peninsula shared path. Investment by central government of the final unfunded section of this project, the Peninsula Connection, would ensure its completion and enable a continued lift in the uptake of active transport witnessed as the project has been delivered. The Shaping Future Dunedin Transport programme has been developed jointly with Waka Kotahi and Otago Regional Council to drive changes in mode share in Dunedin as a response to the construction of the new Dunedin Hospital.

36. However, to achieve mode shift targets, local efforts need to be backed by much stronger government direction, support, and investment (particularly in relation to public transport). Dunedin is the largest urban area not yet covered by the Waka Kotahi place-based mode shift plans, and this is hampering achievement of local mode shift ambitions. To improve mode shift outcomes in Dunedin the Shaping Future Dunedin Transport programme needs to be incorporated into the Waka Kotahi mode shift framework.

37. It is difficult to understand under what circumstances additional highway capacity could align with climate targets, in the context of emissions associated with highway construction and maintenance, and their potential to induce VKT. The DCC notes that a 'high threshold' for such activities is included in the ERP but it is unclear what this threshold is. The DCC submits that highway construction is contrary to climate ambitions and seeks further clarity on this matter.

38. DCC generally supports the other associated actions listed in the document but suggests that any actions that can practicably be accelerated to facilitate change in the first budget period should be actioned without delay. These actions are likely to involve incentives for the community to use existing low emissions network infrastructure.

39. Further, as discussed in paragraph 18 above, legislative changes to the Land Transport Management Act to create stronger alignment to the goals of the ERP would assist in driving down transport related emissions.

40. For example, the DCC considers that while much-needed public transport network improvements are being planned and implemented, sustained fare reduction and/or elimination would be straightforward to implement in the first budget period. Early implementation of public transport initiatives, such as free fares, would provide a high-profile opportunity to kick start behaviour change, while maximising the emissions reducing potential of the existing public transport network. The DCC welcomes the Government's commitment to retain lower fares for community service card holders and suggests this programme could be progressively expanded to reduce fares for others in the community too. The DCC supports the campaign for Fares Free Public Transport as an initiative to promote equity, mode shift, and emissions reductions from transport.

41. The DCC notes that the ERP specifically references major public transport improvements for Auckland, Wellington, and Christchurch. Yet improvements to lift frequency and availability of services in other major centres such as Dunedin are not included. The DCC submits that the emissions reduction plan should support improvements to the frequency and availability of public transport services, including

the availability of daily passenger rail services in certain areas of Dunedin. In addition to supporting an uplift in urban bus networks nationwide, peri urban and intercity services are also improved. This is of particular interest to Dunedin given the large geographic area of the City which includes many peri urban and rural communities currently not served, or underserved, by public transport.

42. The DCC also submits that increased support for workplace travel planning should be available to councils during the first budget period to promote mode shift and reduce VKT. This will enable councils to work with larger employers to reduce carbon emissions from workplace travel. The DCC is currently offering a transport planning service supported by Waka Kotahi, but the full potential of this programme is unable to be met due to resource constraints.

43. Other tools and initiatives that would help enable cities like Dunedin to quickly transition to a lower emission transport system include:

    - Higher funding assistance rates for low emission activity and simplified process for local government to access funding to accelerate local government delivery of infrastructure to enable low emission mode shift.
    - Access to better pricing and demand management tools
    - Accelerating the roll out of the Accessible Streets Regulatory Package to enable local government to make swifter changes to deliver a step change to walking and cycling rates.
    - Increasing the eligibility of Waka Kotahi funding to also cover footpaths and cycle routes going through parks and reserves which form part of the strategic walking and cycling networks

Transport Focus Area 2: Rapidly adopt low-emission vehicles

44. The DCC supports adoption of a target focused on decarbonising the light vehicle fleet. However, the DCC would support a higher ambition target than that proposed. Dunedin already has a high uptake of electric and hybrid vehicles. A University of Otago study showed that by the end of 2019, Dunedin had the highest proportion of pure electric vehicles of any urban centre, at 5.16 per 1000 residents.

45. The associated actions in this section are generally supported.

46. The DCC observes there is a risk that reliance on electrification of the vehicle fleet to achieve emissions targets may exacerbate existing inequalities, and result in both emissions leakage and environmental degradation elsewhere. The intention to support community-based and Māori-led schemes to make low-emission vehicles more accessible, including e-bikes and shared-ownership schemes, is therefore particularly welcome.

47. The DCC welcomes the funding for an equity-focused scrap and replace scheme and submits that Dunedin would be well-placed to help pilot this. To further reduce the embodied emissions from new EVs, the scheme should also support conversion of existing internal combustion engines (ICE) vehicles to EVs. There is already some expertise and experience doing this in Dunedin, which could be expanded.

48. In addition to replacing scrapped vehicles with EVs, strong consideration should be given to enabling funding for purchasing e-bikes (including cargo e-bikes), car share scheme credit, or public transport credit. This would have the additional benefit of not only getting older inefficient cars off the road but also benefiting lower emission mode-shift.

49. The DCC considers that implementing a clean biofuels mandate will help reduce emissions from light vehicles where uptake of electric vehicles and hybrids will be slower due to affordability or availability of suitable vehicles.

Transport Focus Area 3: begin work to decarbonise heavy transport and freight

50. The DCC supports actions to reduce emissions from freight transport. Developing sector plans and strategies is a good first step, but more ambitious, earlier action is needed if we are to meet either local or central government emissions reduction targets.

51. The DCC submits that restricting investment in rail to the limited ambition of the New Zealand Rail Plan will exclude significant opportunities to reduce emissions for the first two budget periods. Implementation should include an increased focus in the next Rail Network Investment Proposal on low-cost interventions that can unlock greater shifts of freight to rail.

52. For example, in Dunedin, Port Otago processes over 14% of all New Zealand exports. A passing loop and forestry log/freight hub south of Dunedin have been identified as key interventions that would increase the proportion of freight traveling through central Dunedin to Port Otago on rail. A passing loop would also open up the possibility of using existing rail infrastructure for commuter purposes, and in addition to reducing emissions, these investments would provide safety and wellbeing benefits. However, neither is likely to be funded within the scope of the current New Zealand Rail Plan.

53. The DCC welcomes recognition that coaches and trains are an alternative to interregional air travel. Actions to improve and incentivise inter-city and regional public transport should be included in the plan. Inter-regional buses are predominantly commercial enterprises, and the lack of interregional rail in the south means there are currently limited attractive alternatives to aviation. A shift to a more holistic inter-city and regional public transport model is likely to promote enhanced social and environmental outcomes and is considered essential for driving down emissions from aviation.

54. The DCC supports the ERP's plans to mandate only zero emissions buses are purchased for public transport by 2025 and support councils to decarbonise public transport fleets by 2035. However, in order to meet the DCC's more ambitious target, support for a swifter decarbonisation of the existing Dunedin bus fleet would be welcomed.

55. The DCC supports the ERP's plan to improve bus drivers wages and conditions and sees this as a key step to increasing the availability, frequency, and reliability of public transport.

56. The DCC supports the target to reduce the emissions intensity of transport fuel. This includes support for the introduction of a sustainable biofuels mandate, increasing uptake of electric heavy vehicles where practical and further investigation into the feasibility of clean hydrogen. The DCC would like guidance and support from central government on the role of councils in supporting and facilitating heavy vehicle electric charging networks.

57. The DCC's submission on the ERP's discussion document supported a restriction on internal combustion engine (ICE) entering Aotearoa New Zealand, provided there is sufficient certainty that suitable electric or hybrid options will be available for all classes of light vehicles. The DCC notes that such a clear restriction is not planned in the ERP and instead a maximum CO_2 limit or penalties for imports are proposed to be developed. In developing these measures, the DCC supports consideration of stronger restrictions on the ability to import high emitting vehicles where alternative low emission vehicles are readily available.

Building and Construction and Energy

58. The DCC supports the Building for Climate Change programme and submits that it needs to be progressed with urgency.

59. As part of its commitment to emissions reduction, the DCC is actively working to mitigate emissions from existing building stock in its own ownership. Actions include:

    - insulation upgrades across the 950 units in the DCC's social housing portfolio
    - building new social housing units to passive house principles
    - a focus on minimising emissions in the planning and design of new DCC building projects
    - a Council-employed advisor who provides free advice to homeowners wishing to improve the health and efficiency of their home
    - working to displace use of LPG and coal for heating in major CBD buildings and facilities.

60. The DCC is experiencing growing demand for the free advice it provides to households on matters relating to energy efficiency. The DCC recommends that increasing the visibility and accessibility of such advice is a focus of efforts to reduce emissions from building stock. There is a particular need for this in the face of rapidly changing technology (e.g. in relation to refrigerants), and to support lower socio-economic families and tenants through the transition.

61. The DCC welcomes an increase in funding to facilitate the end of coal boilers in schools. Through support of the Enviroschools programme, the DCC has also been involved in investigating alternatives to coal use in local schools. According to information supplied by the local Enviroschools team, approximately half of Dunedin's schools are currently using coal.

62. In addition, the DCC submits that the government should consider expanding the state sector decarbonisation fund to include eligibility for the wider public sector so that local government can more rapidly transition away from coal and gas fired boilers (often used to heat pools and buildings) and speed up the transition to electric fleets.

63. The DCC submits that improving energy efficiency and moving away from fossil fuels must occur simultaneously. The number of old systems and infrastructure requiring replacement across the country is a challenge. Retrofitting existing buildings and their heating systems is ultimately far less satisfactory than ensuring they are built to align with good social and environmental outcomes in the first place. As a medium-growth city, ensuring that new buildings are aligned with the city's low carbon ambitions will be important in achieving emissions reduction targets. The DCC would therefore support continued improvements to energy efficiency standards for new buildings.

64. As noted in DCC's submission to MBIE on Building for Climate Change, as changes to the building sector are implemented to reduce emissions, significant government support will be required, both for the construction sector and Building Consent Authorities. Emissions reduction policies have the potential to introduce greater complexity and cost to building design, consent and construction processes.

65. The DCC submits that some simple yet effective initiatives were missing from the ERP. The following additional actions would quickly improve energy efficiency:

    - Experts from the University of Otago's Centre for Sustainability estimate that large scale shift to LED residential lighting could significantly reduce peak evening energy demand. This could be enabled by providing subsidies to make

LED lightbulbs cost comparative to incandescent or compact fluorescent bulbs, and by providing them free to low-income households.

- Expanding the eligibility of the Warm Up New Zealand scheme to include funding for wall insulation and double glazing retrofits would result in reduced heating energy demand while creating healthier homes. This would be especially beneficial in colder climates like Dunedin.

- While funding for heat pumps is available, this could be expanded to include heat pump hot water heaters (and solar hot water heaters) which are highly efficient ways of heating water (which is a large component of most household's energy bills) and would similarly assist to cut demand during times of peak demand.

Waste and Circular Economy

66. The DCC supports progress moving Aotearoa towards a circular economy and the target to reduce waste biogenic methane emissions by 40 percent by 2035. As noted earlier, the DCC is particularly supportive of actions to achieve gross emissions reduction in the period to 2030.

67. Dunedin's Waste Minimisation and Management Plan 2020 (WMMP) commits to achieving zero waste (including a circular economy) by 2040, with an aim to increase the diversion rate away from landfill and incineration to at least 70% by 2030.

68. Through its Waste Futures project, over the period to 2030 the DCC is investing significantly in:

    - organics diversion, including a new kerbside collection system for kitchen waste, associated processing facilities

    - construction and demolition waste diversion

    - recycling capacity, including a new materials recovery facility and transfer station

    - a new community-based resource recovery park

    - the DCC is also continuing investment in the collection and destruction of landfill gas at Green Island Landfill.

69. This investment programme has been assessed as being likely to reduce emissions from general waste by 24 percent, with the DCC's 10 year plan anticipating most of the infrastructure and services required to achieve this will be in place by 2025/26.

70. The DCC supports waste minimisation actions that align closely with the waste hierarchy, and actions that help to create systemic change within the waste system. Therefore, the DCC supports the following proposals:

    - scenario 1 for managing landfill gas from sites without gas capture systems

    - transfer stations being required to separate and recycle materials where possible, rather than sending these materials to landfill

    - licensing for the waste sector and improving data collection across the sector

    - a standardised recycling system across Aotearoa New Zealand, including in rural areas. The DCC also supports standardised diversion of food and garden

waste nationwide. The DCC submits that easier access to these services would help to reduce emissions from waste.

- funding for education on organic waste reduction. However, the DCC submits that education alone is not sufficient to adequately reduce emissions from organic waste. Therefore, the DCC supports a ban on disposal of organic waste from 2030, provided alternative disposal options are readily available.

71. The DCC suggests other methods for reducing waste emissions involve considering supply chains and consumption. Some examples include mandatory product stewardship schemes, re-use quotas, product design specifications, binding targets for the reduction of harmful products, incentives for service/sharing economy, bans on single-use products. The DCC welcomes the work underway on the New Zealand Waste Strategy but considers greater emphasis should be placed on specific actions focused on these solutions.

72. The DCC notes the capital-intensive nature of resource recovery and processing infrastructure can be a barrier to local government investment in waste solutions that optimise emissions reduction. Local government will need support to establish appropriate diversion infrastructure.

73. As noted in the DCC's submission on Te kawe i te haepapa para: Taking responsibility for our waste, the DCC submits that Section 23 of the Waste Minimisation Act 2008 (WMA) should include aspects that can be aligned with other regulatory guidance. The RMA, Consumer Guarantees Act 1993, and Imports and Exports (Restrictions) Act 1988 should be aligned to prevent difficult waste streams from entering Aotearoa New Zealand, and setting quality standards for goods to enable repair, and standardise packaging to ease recycling.

74. The significant regional disparity in waste management due to Waste Plans occurring at a regional level could be addressed by national minimum standards for land disposal practices. The DCC submits that farm fills should be a non-complying activity under the RMA. Providing regional authorities with waste levy funding for enforcement and monitoring would also enhance outcomes at the regional and district level.

75. The transition to a low-waste, low-carbon economy can be made more equitable through reducing waste disposal costs for lower income households and ensuring diversion services are accessible to all. In addition, creating systemic change within the waste sector should reduce the burden of disposal costs on individual households and businesses.

Monitoring and reporting

76. The DCC submits that the government must openly share the data and modelling that has underpinned the development of the ERP in an accessible format to enable effective monitoring and reporting of progress on the ERP. Sharing this information enables transparency, accountability, and would also be useful for local government and businesses as they plan how they can effectively contribute to meeting emissions reduction goals.

77. As discussed in paragraph 20 above, challenges that the DCC and other local authorities face include access to timely reliable datasets to understand and track emissions at a local level, and a lack of unified tools for modelling emissions reduction pathways. The DCC encourages central government agencies to work with local government on enabling access to data and building a common tool to model emissions reduction pathways, the effect of interventions, and tracking progress at a local level with the ability to integrate models into a national action tracker tool. This would enable timely, effective, cost efficient, and transparent monitoring and reporting.

Concluding remarks

78. Thank you for the opportunity to submit on the Te Hau Mārohi ki Anamata – Towards a productive, sustainable, and inclusive economy: Aotearoa New Zealand's Emissions Reduction Plan.

79. The DCC looks forward to working with central government, mana whenua, partner agencies, businesses, and communities on this important transition.

Yours faithfully,

Aaron Hawkins
Mayor of Dunedin