

# Office of the Mayor



29 May 2024

Consultations: 2024 Review of the 2050 target; International shipping and aviation;  
and fourth emissions budget (2036-2040)

Climate Change Commission  
PO Box 24448, Wellington 6142

Tēnā koutou

## **SUBMISSION ON 2036-40 EMISSIONS BUDGET, REVIEW OF TARGETS, AND WHETHER TO INCLUDE INTERNATIONAL SHIPPING AND AVIATION EMISSIONS**

1. The Dunedin City Council (DCC) thanks the Climate Change Commission (the Commission) for the opportunity to comment on the draft 2036-40 emissions budget, review of the 2050 targets, and whether to include international shipping and aviation emissions in Aotearoa New Zealand's emissions reduction targets.
2. This document covers the DCC's submission on each topic.
3. Overall, the DCC supports the Government's aim for a carbon neutral future and a strong low emissions economy, and the ambition to engage all sectors in supporting these objectives. The DCC urges fast gross emissions cuts in the years to 2030. The DCC submits strengthening the current 2050 target, ambitious emissions budgets, and inclusion of international aviation and marine emissions will support gross emissions cuts and global efforts to limit warming to 1.5° Celsius above pre-industrial levels.

### **Dunedin's climate change response**

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:
  - a. net zero emissions of all greenhouse gases other than biogenic methane by 2030; and
  - b. 24% to 47% reduction below 2017 biogenic methane emissions by 2050, including 10% reduction below 2017 biogenic methane emissions by 2030.
5. In June 2022, the DCC adopted the Zero Carbon Policy, which among other things directs the DCC to prioritise gross emissions reductions.
6. In September 2023, the DCC adopted the Zero Carbon Plan, outlining the key shifts required for Dunedin city to achieve the Zero Carbon 2030 targets, and the actions the DCC need to take to support achievement of the targets.

7. Any decision by the Government on whether to include international shipping and aviation emissions in Aotearoa New Zealand's emissions reduction targets will have impacts upon DCC plans such as the Ōtepoti Dunedin Destination Management Plan adopted by the DCC in August 2023, and the Cruise Action Plan 2023-2025.

#### **WHAT THE EMISSIONS BUDGET SHOULD BE FOR THE PERIOD 2036-2040**

8. As noted above, the DCC have adopted a net zero emissions target of all greenhouse gases other than biogenic methane by 2030 for Dunedin city. The DCC urges government to reduce gross emissions as quickly as possible, especially in the years to 2030.
9. The DCC are supportive of the Commission's *proposed recommendation 4* to limit use of offshore mitigation for the fourth emissions budget, with this recommendation in line with the DCC's focus on prioritising gross emissions reduction.
10. The DCC are supportive of the Commission's *proposed recommendation 5*, which recommends decreases to the existing total allowable emissions in Emissions Budget 1 (2022-2025), Emissions Budget 2 (2026-2030) and Emissions Budget 3 (2031-2035).

#### **REVIEW OF AOTEAROA NEW ZEALAND'S 2050 TARGETS**

11. The DCC notes the evidence presented by the Commission on changes since emissions reduction targets were set in 2019, and submits that reviewing Aotearoa New Zealand's emissions reduction targets is in line with the purpose of the Climate Change Response Act 2002 (the Act).
12. Specifically, the DCC notes and agrees with the Commission's analysis that the time available to prevent an overshoot of 1.5° Celsius above pre-industrial levels has decreased. As stated above, the DCC urges government to reduce gross emissions as quickly as possible, especially in the years to 2030.

#### **WHETHER TO INCLUDE INTERNATIONAL SHIPPING AND AVIATION EMISSIONS IN AOTEAROA NEW ZEALAND'S EMISSIONS REDUCTION TARGETS**

13. The DCC supports including international shipping and aviation emissions in Aotearoa New Zealand's emissions reduction targets. The DCC includes these emissions sources in its city footprint, in line with the Global Protocol for Community Based greenhouse gas emissions inventories.
14. The DCC considers inclusion of these emissions sources to be consistent with developing clear and stable climate change policies that contribute to the global effort to limit temperature increases to 1.5° Celsius above pre-industrial levels.
15. The DCC notes the Commission's analysis on the emissions reduction opportunities for international shipping and aviation. The DCC submits that innovation needs to be promoted along with investment in research and development of green technologies. A strong support for innovation that can drive the transition to a low carbon economy is essential. This, along with investing in and promoting the adoption of cleaner technologies for aircraft and ships,

especially around advancing the use of new and alternative fuels, is critical to decarbonise international shipping and aviation.

16. The DCC notes the Commission's analysis showing other state governments such as the United Kingdom, European Union (EU) and United States of America have set targets for international shipping and aviation emissions, and that the recently signed EU-NZ Free Trade Agreement refers to the EU and Aotearoa New Zealand working together to support international shipping and aviation emissions reduction.
17. The DCC notes the legal requirements for many businesses to report on their scope 3 international shipping and aviation emissions under Aotearoa New Zealand's mandatory climate-related disclosures regime. The DCC also notes consumers and companies are increasingly seeking supply chains that have reduced greenhouse gases, and that Aotearoa New Zealand relies heavily on international shipping and aviation for tourism, business, imports, exports, and connections with friends and whānau. The DCC submits that taking action on international shipping and aviation emissions is essential to support Aotearoa New Zealand businesses to remain competitive internationally.
18. The DCC considers inclusion of international shipping and aviation emissions in Aotearoa New Zealand's emissions reduction targets, and the legal requirement for these emissions to be included in emissions budgets, emissions reduction plans, and monitoring reports could have co-benefits, such as supporting greater cooperation with governments such as the EU, or supporting businesses to reduce their scope 3 shipping and aviation emissions.
19. The DCC acknowledges the complexities outlined by the Commission covering the barriers to reducing emissions from international shipping and aviation. However, the DCC considers there are barriers and complexities involved in emissions reduction across most if not all sectors of our economy and society, and that including international shipping and aviation emissions in Aotearoa New Zealand's targets, plans, and monitoring of emissions will provide much greater support in finding solutions to these complex issues over the coming years.

Yours faithfully



Jules Radich  
**MAYOR OF DUNEDIN**  
**TE KOROMATUA O ŌTEPOTI**