**Emissions Reduction Plan (ERP) Submission Guide**

**What is the ERP?**

Aotearoa New Zealand has adopted a target of significantly reducing our greenhouse gas emissions by 2050.

The emissions reduction plan sets out policies and strategies for achieving emissions budgets from 2022 through to 2035, and the discussion document describes existing actions we have committed to and sets out new proposed actions to further reduce our emissions.

The Ministry for the Environment is asking for feedback on the ideas and policies proposed. This will help shape the finalised Emissions Reduction Plan, which is likely to have an impact on all New Zealanders.

**How to make a submission**

You can find the full text of the ERP Discussion Document [here](https://consult.environment.govt.nz/climate/emissions-reduction-plan/), and also find a link to [Have Your Say](https://consult.environment.govt.nz/climate/emissions-reduction-plan/consultation/) and provide feedback.

The online feedback site is easy to navigate, with different sections and the relevant information at your fingertips. You’ll need to start by entering some details and giving your consent to release your submission. This is an important part of ensuring submissions are transparent and genuine.

**Submissions close on Wednesday 24 November.**

We suggest reading through the discussion document, but if you’re short on time, we’ve provided guidance for a selection of questions related to transportation, but there’s no need to stop there!

If you have a passion or knowledge for other areas of the discussion document, go right ahead and provide additional feedback!

We recommend you write your submission in your own words, so we’ve just provided some quick prompts here as a guideline. While there are many questions (allow at least 30 minutes for a comprehensive submission), you can answer as few or as many questions as you like.

Better to get in a small submission than to say nothing at all!

**Key points related to transport**

We believe the most important aspects relating to transport are that the objectives are ambitious, transformational and equitable. Targets should be evidence based, measurable and clearly define responsibilities to different authorities.

We believe the primary objective of reducing Vehicle Kilometres Travelled (VKT) is not ambitious enough (it should be much greater); and should be defined by region, rather than as a national target, to ensure regional authorities can be held to account for “playing their part”.

We believe the “Avoid, Shift, Improve” methodology should guide transport decision making:

* Avoid travel where possible, primarily through urban design.
* Shift journeys taken towards sustainable modes by prioritising active, public and efficient freight transport such as rail.
* Improve the remaining trips taken by improving fuel efficiency and electrifying the vehicle fleet.

**Specific Question Guidance**

Transition pathway

5. Are there any other views you wish to share in relation to the Transition Pathway?

* Our transition pathway must be evidence based and set in line with limiting global warming to 1.5 degrees. This requires a significant reduction in emissions prior to 2030 - more ambitious than is currently proposed.
* The transition pathway should prioritise local emissions reductions, rather than enable exporting emissions through foreign offsetting or creative accounting.

You can find out more about our emissions target by reading the [Lawyers for Climate Action New Zealand Climate Change Commission advice here](https://www.lawyersforclimateaction.nz/news-events/ccc-final-advice).

Helping sectors adapt:

6. Which actions to reduce emissions can also best improve our ability to adapt to the effects of climate change?

* Diversifying the transport system away from private motor vehicle ownership will add significant network resilience.
* Low-cost, low-energy forms of transport, like walking and cycling, can more easily be modified and adapted owing to environmental changes and challenges.

7. Which actions to reduce emissions could increase future risks and impacts of climate change, and therefore need to be avoided?

* Over-reliance on private motor vehicle ownership and heavy goods vehicles for transportation requires significant ongoing maintenance and infrastructure cost, which diverts necessary funding from climate mitigation strategies.
* A private motor vehicle based transport system conflicts with the need to intensify urban environments, as it will become impossible to provide for traffic volumes as populations increase without significantly changing transport habits.

Making an equitable transition

16. How can Government further support households (particularly low-income households) to reduce their emissions footprint?

* Transport makes up the largest portion of household emissions, so should be a priority focus.
* An e-bike subsidy or vehicle scrappage scheme which replaces an older ICE vehicle with a e-bikes or an e-cargo bike, will significantly reduce household emissions and also reduce ongoing household expenditure.
* Reducing public transport fares or providing low or no-cost public transport for lower income earners could also reduce household emissions, particularly for low-income households.
* A subsidy for electric light vehicles (EVs) is likely to be of limited use for low-income families, who will not be able to afford a newer model vehicle even if a subsidy is provided. Continued reliance on light vehicle ownership will also place a continued financial burden on lower income households.

Planning

34. What more do we need to do to promote urban intensification, support low-emissions land uses and concentrate intensification around public transport and walkable neighbourhoods?

* Aim for a “mixed use as of right” urban planning model which encourages development of compact urban forms (including in rural townships), including walkable distances to commercial amenity and employment.
* Require all new residential development in cities and larger towns to take place within the walkable catchment of frequent public transport.
* Require greenfield development to invest in new public transport services before further suburban expansion is possible.
* Require robust justification for height limits on development, beyond “character” or other subjective criteria.

35. Are there any other views you wish to share in relation to planning?

* Additional green space, permeable surfaces and tree coverage within urban environments should be encouraged. This may require additional funding (possibly through developer contributions), or could come through re-purposed road space as a reduction in traffic volumes takes place.

Behaviour change – empowering others to act

42. What information, tools or forums would encourage you to take greater action on climate change?

* Social media has become an unreliable and unwelcoming place for many to participate in discussions and decision making.
* Engagement and decision making should be encouraged through representative, informed democratic working groups, such as a citizens assembly or deliberative democracy.
* Communications should focus on outcomes and benefits, before discussing necessary steps to achieve the desired outcomes.
* Transparency is critical, and all parties participating must be willing to act transparently and in good faith.

43. What messages and/or sources of information would you trust to inform you on the need and benefits of reducing your individual and/or your businesses emissions?

* Representation matters: local communities should be resourced sufficiently to promote positive changes in a way that works for them.
* Simultaneously, leadership is critically important and central government messaging on the scale and pace of change required to reduce emissions has been largely insufficient to date.

44. Are there other views you wish to share in relation to behaviour change?

* Consideration should be given to limiting or preventing the advertising of fossil fuel use and industry, including ICE motor vehicles, due to the tremendous harm these products cause.
* The Bike Ready program should be expanded with an aim to educate all New Zealand children in bike skills, with a comprehensive program developed by 2030.
* New Zealand driver licensing and education should be reviewed in line with a predicted increase in active transport modes and driver interaction. Currently, little (if any) focus is given to interactions between motor vehicle operators and road users outside of a vehicle. This should include heavy vehicle driver licensing and training.
* New Zealand’s Mandatory Helmet law places responsibility for safety on victims and likely suppresses cycling uptake. The law should be comprehensively reviewed based on international best practice and population health evidence.

Transport

52. Do you support the target to reduce VKT by cars and light vehicles by 20 per cent by 2035 through providing better travel options, particularly in our largest cities, and associated actions?

* Yes, but:
* The target is not ambitious enough. We need to see at least a 20% reduction by 2030.
* As this reduction will not be evenly distributed between rural and urban environments, VKT reduction targets should be set by region, so as to ensure local transport authorities can be held accountable for meeting their necessary targets.

53. Do you support the target to make 30 per cent of the light vehicle fleet zero-emissions vehicles by 2035, and the associated actions?

* Yes, but:
* The target places too much focus on maintaining the light vehicle fleet.
* Priority must be given to shifting people out of light vehicles, and targets should reflect this, including a possible target to reduce the light vehicle fleet size.
* E-bikes should be recognised as the ideal emissions-free vehicle, considering their lower cost and associated health benefits.

54. Do you support the target to reduce emissions from freight transport by 25 percent by 2035, and the associated actions?

* Yes, but:
* 25 percent by 2035 would mean that freight is largely not “pulling its weight” in terms of emissions reductions.
* Develop a comprehensive freight strategy which also plays close attention to road safety and Waka Kotahi’s Road to Zero policy.
* Investigate all opportunities to move freight to rail and coastal shipping, and to further electrify the rail network.
* Investigate the role which e-cargo bikes can play in urban freight, and develop supporting infrastructure to enable more freight to travel by cargo bike.
* Recognise that freight efficiency is improved by reducing traffic volumes, further supporting the need for mode-shift away from light vehicle trips.

55. Do you support the target to reduce the emissions intensity of transport fuel by 15 per cent by 2035, and the associated actions?

* Yes, but:
* A more comprehensive approach would be to calculate how much fuel could be expended within each emissions budget period, then set a limit to how much fuel can be imported into Aotearoa in line with this maximum.
* Any introduction of biofuels should include strict measures to ensure these policies do not lead to other negative environmental or social outcomes, such as deforestation or food poverty.

56. The Climate Change Commission has recommended setting a time limit on light vehicles with internal combustion engines entering, being manufactured, or assembled in Aotearoa as early as 2030. Do you support this change?

* Yes, but:
* Bring forward the phase-out of ICE vehicles by setting a “sinking lid” policy on vehicle CO2 emissions efficiency through to 2030.
* Remove the Fringe Benefit Tax from all ICE vehicles as soon as practicable
* Introduce a vehicle scrappage scheme with an intention to reduce the overall size of the ICE vehicle fleet.
* Restrict advertising for ICE vehicles.

57. Are there any other views you wish to share in relation to transport?

* The scale of pace and change required to meet our climate targets cannot be overstated. We need to act as quickly as possible with transformational ambitions.
* Transport, health and climate are all linked, and cannot be addressed in isolation. Shifting our transport habits away from private vehicle journeys will have many far-reaching benefits beyond reducing emissions and climate mitigation.