

Tabled @ Hearing
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The Regional Council Air Plan has the goal of ensuring that any contaminants that are emitted into the air do not have effects beyond the boundary.

Many will have noted that nearly every year this century, and 2015 is not an exception, is identified as either the hottest or one of the top ten hottest recorded since civilisation began.

Elsewhere and more importantly the IPCC has an ultimate objective to stabilise greenhouse gas emissions at levels that would prevent dangerous anthropogenic interference with the climate system. (UNFCCC Article 2).

They have also determined that these levels are such that 2°C increase in temperature is the likely occurrence at where this will occur and has identified that a 25-40% reduction from 1990 levels of Greenhouse Gases is necessary to give a 50% chance of achieving this target. In essence then greenhouse gases cause effects beyond boundaries.

The IPCC system is such that “no court of law could possibly deviate from IPCC findings since any expertise put before the court would never be as inclusive as that inherent in the IPCC”¹. Ideally then this area doesn’t have to be covered.

In August 2013 the New Zealand Government made a commitment to reducing our greenhouse gas emissions to 5% below 1990 levels by 2020.² It is noted in the Canterbury Regional Policy Statement 2013 that National Policy Statements come from the Minister for the Environment. This commitment was made by Tim Grosser the Minister for Climate Change.

While maybe not as “fair and ambitious”³ as set out in the “New Zealand’s Climate Change Target Discussion Document” this is a commitment that has been made.

To meet the target we need to recognise that 2013 net emissions were 42% above 1990 levels and gross emissions (excluding carbon from forestry and land use) 21% above 1990 levels⁴ and that with development and population growth and no constraints greenhouse gas emissions will increase.

The letter to the UNFCCC also included Quantified economy-wide emission targets for 2020 if there was a comprehensive global agreement including “there is an effective set of rules for land use, land-use change and forestry (LULUCF) ²”.

It was announced at the Australia-New Zealand Climate Change and Business Conference held in Auckland in October 2015 that New Zealand Mayors have signed the New Zealand Declaration on Climate Change. This indicated that the mayors representing half of New Zealand would develop and implement ambitious action plans that reduce greenhouse gases and work with central government to deliver on National emission reduction targets. So there is an understanding that Local Government will do its part.

The Resource Management Act Section 70A and B have a brief, although dated (2004), section of Rules on Climate Change. Therefore the Government has identified that Regional Council’s should consider Climate Change under the RMA and make rules, albeit presently limited, within an Air Plan.

The Resource Management Act is also in the process of being reviewed and given the level of concern and direction that will need to be taken this will need to have a major focus on Climate Change if New Zealand is to have any chance of meeting its goals.

The Government has indicated that there will need to be significant changes in how New Zealanders behave in regard to emissions and this will need to occur urgently if we are to meet our commitments, changes to the Resource Management Act are in total unlikely to be enough or timely to meet new Zealand requirements.

Local Government has already indicated that it supports action to limit climate change.

The Regional Council should therefore be taking every possible step that is within its abilities to undertake what is intended by the IPCC and central and local government. If Environment Canterbury is putting effort into addressing the issue of odour from roasting coffee beans then an issue which will place in jeopardy the livelihood of many millions of people over the next century should attract significantly more importance.

Government Policy Statements give strategic Direction to Regional and Local Government. This commitment to the UN is giving direction at a higher level than Government Policy Statements.

In Chapter 14 of the Canterbury Regional Policy Statement 2013 it is noted that “The Canterbury Regional Council is required to focus on the consequence of climate change, not the discharge into air of greenhouse gases”, this does not mean it will ignore the discharge of greenhouse gases which would be an ambulance at the bottom of the cliff approach and would not align with 70B of the Resource Management Act where a Regional Council may make rules on Climate Change in accordance with a national environmental standard. The national environmental standard has by default now been set on the international stage.

The first decision sought (to 1 Introduction) is that carbon dioxide and greenhouse gases are recognised as pollutants. This is matched by my support for Table 2.1 that “Contaminants define anything that when discharged onto or into land or into air changes or is likely to change the physical, chemical or biological condition of the land or air onto or into which it is discharged”. This is totally in line with the IPCC findings that greenhouse gases will alter the nature of the planet.

I believe that significant generators, either at a business or industry level, of greenhouses gases are required to have a “Greenhouse Gas Air Plan” that shows how they will meet the requirements of the RMA and any rules able to be imposed by Environment Canterbury.

New Zealand is the fifth highest per capita emitter of greenhouse gases, we have committed to an unambitious target with major uncertainty on whether it can be achieved. If we value our reputation and recognise that we are here to make a difference then we need to use every means at our disposal to reduce our impact on the planet.

1 Roda Verheyen, Climate Change Damage and International Law, 2005.

2 letter from Tim Grosser to the Executive Secretary United Nations Framework Convention on Climate Change (UNFCCC)

3 Ministry for the Environment May 2015

4 New Zealand Herald April 11 2015