

To:  
Low Emissions Economy  
New Zealand Productivity Commission  
PO Box 8036  
The Terrace  
Wellington 6143

[info@productivity.govt.nz](mailto:info@productivity.govt.nz)

## **Submission on the Low Emissions Economy Productivity Commission report**

From Jim & Audrey Walker  
1353 Ongarue-Waimiha Rd  
Waimiha 3998  
07 8945833  
[ajwalker@farmside.co.nz](mailto:ajwalker@farmside.co.nz)

Dear Commissioners,

Thank you for the opportunity to submit on your draft report.

We are sheep and beef farmers from Waimiha in the Ruapehu district and have been farming here since 1976.

### **Chapter 8 Short Term Gases**

With reference specifically to Methane emissions from livestock we are unsure and concerned at the way the emission is accounted for.

We have attached a diagram of the Carbon pastoral cycle.

This shows the recycling of methane emitted by ruminant livestock being degraded and recycled back in to pasture over a period of eight to fifteen years.

We believe that the local accounting and the International GHG Inventory rules count gross emissions as emitted by livestock, not net emissions, as we believe it should be.

If livestock numbers are stable it would appear historic methane in the atmosphere will not increase. 1000 ewes in 1950, 1000 ewes now, there is no change in methane.

While the Commission Report seems to acknowledge the short term nature of ruminant methane it still quotes NZ Agriculture as being responsible for 50% of New Zealand's total emissions, with methane 47% of NZ's total.

If ruminant methane was accounted for on a net basis would that still be the case?

For example, the rationale behind the benefit of artificial meat production may in fact be based on flawed GHG accounting.

While agreeing with the report that historic methane levels need to be held close to present levels, we believe the 50% figure quoted so often in media has led to the perception that agriculture, especially ruminant animals, are responsible for most of the problems. This distracts from the necessary focus on long term gases which the public needs to buy in to.

In 2009 our farm was involved in a sustainable farming fund study lead by Ag Research and a local group, Taumarunui Sustainable Land Management Group.

Our farm study case showed:

- Total GHG emissions were 4.973 Tonnes per hectare
- GHG Emissions intensity was 14.6 kg per hectare
- Total emission reduction since 1990 was 13%.
- Emissions intensity reduction since 1990 was 18%.

The conclusion was that less livestock with higher productivity, due to better genetics and pasture, led to a lowering of gross emissions and a lowering of carbon intensity product.

**We submit:**

**That ruminant livestock emissions be left out of the ETS as there appears to be doubt as to how it should be accounted for. ie. net or gross**

Because of a lack of suitable tools there is difficulty accounting for methane emission at farm level. However, this is where it should be done to adequately incentivise any changes available.

**We submit:**

**The Commission study this issue further and report back.**

**We Submit:**

**The Ministry of the Environment actively work to change the International GHG Inventory rules to reflect only Net Ruminant methane emissions in their calculations.**

## **Chapter 10 Land Use Change**

While the push to plant up poor producing sheep and beef land seems the right thing to do, in our view all is not as it seems.

We believe sustainability reflects environmental, economic and social and cultural aspects in equal measures.

Unfortunately in our area we have seen a lot of this type of land use change already and believe it threatens the social and cultural cohesion of the community.

The change invariably led to the displacement of families, one sometimes two per property. This has led to loss of services in a cumulative way.

The production forests have not created the local jobs promised.

1) Silviculture has often been abandoned or minimised.

2) Logging crews travel, often in excess of three hours per day, to the jobs which are generally only once in 20 to 30 years. In the case of carbon forests, no jobs post planting.

Most of the harvest involves trucks based around the processing or port areas, not local.

The intense road use is very damaging on fragile roads at a cost to local users and ratepayers.

Risk of environmental damage from heavy rain after harvest is significant as seen recently.

Many steep hills can not sustain heavy forestation.

Forests have low capital value and do not pay a reasonable share of rates.

Owners are not local, fences are not maintained, weed and pest control is not done, all at the inevitable cost to neighbours.

Whilst the planting of native trees seems an attractive alternative and may bring more local work it comes at some risk.

Many of the areas available have substantial populations of feral goats which can devastate a native plantation in very short time. Fencing is expensive and fencers in high demand, preferring to work in easier environments when possible.

Manuka is possibly the most viable option as the honey industry tends to bring more consistent work on an annual, although seasonal, basis.

An irony of all this is that local communities try to compensate for their loss of cohesion by pushing for increased tourism.

Tourism is a high emitting industry as it involves travel, especially airline travel.

It is again ironic that a large part of the land use change is bought about by airlines planting carbon forests to offset their CO2 emissions and then increasing their emissions to facilitate increased tourism.

As said at the beginning of our submission – all is not as it seems.

As postulated in the earlier section of our submission, the basis of calculation of ruminant methane emissions needs to be changed to a net basis. Sheep and beef farming may then again be seen as a reasonable and sustainable land use in these areas.

**We Submit:**

- **That the Commission more fully consider the social and cultural aspects of sustainability in its discussions on land use change.**
- **That the Commission study further the true levels of short and long term emissions from hill country sheep and beef farming to ascertain if it is still reasonable to assume land use change is desirable.**

Yours faithfully,

Jim Walker,            Audrey Walker