

SUBMISSION OF PAUL HUGHES

On the

Productivity Commission - Low Emission Economy - Draft Report - 2018

Adaptation

NO account is taken of measures that will also provide a significant adaptation response to the climate changes that are currently occurring with increased greenhouse gas effects – increased droughts, flooding and landslides.

This indicates that any permanent native afforestation of water supply catchments, flood prone catchments, riparian margins and areas prone to landslide onto public infrastructure should receive special recognition in any plans and policies.

Transport efficiency

A completely rethink of our existing transport infrastructure is required as vehicle emissions are a significant emitter.

Greater efficiency in our transport network can reduce emissions and change transport preferences.

Measures such as increasing public transport use, and walking and cycling. Measures such as improving the information that vehicle users use to navigate to destinations in the most efficient manner, accounting for distance, road surface, and elevation. Measures such as increasing the rail network extent and removing below standard infrastructure limits on Heavy Vehicles. Measures such as moving employment near to where people live to avoid commuting.

Destocking on its own

NO account is taken of the option of simply destocking and eliminating stock emissions permanently on a sustained basis. One does not need to afforest to stop stock emissions, but simply destock. Ideally it should receive credits from the destocking and credits for allowing native regeneration, which would require changes to the credits scheme to allow more than simply planting.

Most grazing of public land could be stopped in an instant, particularly LINZ, DOC and Council land, particularly unauthorised grazing.

Private land can be bought by the government, particularly eroding land with significant externalities.

R 5.1

I support this recommendation

It should include also include any production that supports carbon emissions, including the Tiwai Aluminium Smelter which emits from processed fossil fuels. I understand that the Government supports this emitter, and this should stop immediately

R 10.1

I support this recommendation with one proviso

That it not be led by MPI which I consider in too narrow in its view on these matters

Its NPS on Forestry has already proved to be a failure

The Parliamentary Commissioner for the Environment would be a more suitable lead

The research I have undertaken at OpenGeo Carbon Sink Research shows that all primary land use should be considered for native afforestation carbon sinks with all the other benefits that they bring – see <http://opengeo.co.nz/CarbonSinkResearch1.html> - Smart Afforestation Planning

It is clear that there are clear additional triple bottom line benefits to be obtained by switching from exotic afforestation to native afforestation in the longterm, particularly given the uncertainty that harvested exotic forest timber provides any carbon sink after accounting for all the carbon inputs as referred to elsewhere in my submission

R 10.2

I support this recommendation with one proviso

That it not be led by MPI or LINZ which I consider in too narrow in their view on these matters

MPI is biased towards exotic afforestation, and neither LINZ nor DOC have the expertise to evaluate the native forest option or the effects of exotic afforestation on the triple bottom line

Landcare Research alone would be a more suitable lead

An additional recommendation is required to provide for the Government to create a fund to buy erosion prone private land on a large scale and allow it to natural regenerate into native afforestation. The government sold this land off in the past and created the problem, so it should naturally fix the problem.

Q 10.2

Riparian native afforestation should be included in the NZ ETS by providing a lesser minimum width of 20m for riparian sites.

Many riparian strips are owned by DOC (Marginal Strips) and Councils (Formed and Unformed Legal Roads and Esplanade Reserves) and should be able to receive credits for allowing regeneration rather than planting. This requires changes to legislation to require adjoining owners to pay for all fencing to stop their stock trespassing on this public land that should be in native forest, subject to fines for continuing trespass on land that would otherwise be native forest carbon sink.

R 10.7

I do not support this recommendation

I question whether carbon sequestered in wood products is the whole picture of such plantation forests. Because they take carbon to establish, maintain, harvest and transport to the place of final use, these carbon emissions need to be in the equation, not just carbon sequestered in timber for a short period of use. The only report that I have seen that considers this is Grant Rosoman Greenpeace *Ecoforestry – Towards a responsible plantation forestry* NZ Forestry February 1995 and this needs to be comprehensively independently evaluated otherwise assuming timber is a sink is just an assumption. It also fails to account for forests used for timber that is not used in constructing something i.e. pulp and paper etc.

Acceleration afforestation p 276

Such large scale afforestation should not occur without open and transparent independent assessment of the triple bottom line effects and benefits beforehand, otherwise we will just perpetuate the same mistakes as in the past.

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F 11.7

I agree that huge uptake of EV will increase emissions in the electricity generation sector

To support this move I would ask that full consideration be given to bring two low emission plant into the national pool

1. Stop financially supporting and supplying Tiwai Smelter and fully integrate the Manapouri publicly owned generation into the national supply.
2. Government buy the Kawerau pulp mill and use the geothermal generation for the national supply. It would also have the benefit of closing a marginal business and stopping the gross pollution of the Tarawera River which is a blight on the NZ water quality reputation.

I would also ask that Government support public transport moving to EV for buses and trains

R 11.3 and 11.4

Agree strongly as a kickstart

Q 12.1

I consider that the current RMA rules are too requiring and permissive

Not all districts have economic potential for wind or hydro and may requirements need to be where the economic resource is subject to environmental effects. Otherwise we are investing time energy and finance in low benefit and smaller plant where there are not the economies of scale

Q 14.1

I support including wastewater treatment plants in emissions schemes

They are emitting and should not be subsidised

R 15.2 & 15.3

Support strongly

Electricity savings from Baseload

I support any moves to subsidise home insulation and street lighting as these reduce baseload demand at peak load regardless of the weather, which will reduce the need for carbon emitting peak load plant

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