

From: [Info at MfE](mailto:Info@MfE)
To: s 9(2)(a)
Subject: RE: Regulation of Geoengineering activity
Date: Tuesday, 15 March 2016 1:22:00 pm
Attachments: [image001.png](#)

Dear s 9(2)(a)

Thank you for your email of 1 March 2016 regarding the regulation of geoengineering activity.

You are correct that geoengineering, or the deliberate large-scale intervention in the Earth's natural systems to counteract climate change, has been discussed in the scientific community as a possible method of counteracting climate change.

There are a wide range of proposed geoengineering techniques, which can be grouped into two categories: solar radiation management and carbon dioxide removal. Solar radiation management aims to reduce the absorption of solar radiation by increasing the earth's reflectivity, while the aim of carbon dioxide removal is to remove carbon dioxide from the atmosphere.

Most of the proposed techniques would need further (and often substantial) developments before reaching an operational stage. There are also a significant number of potential consequences that would need to be considered before any proposed geoengineering technique could be implemented.

For example, once geoengineering methods have started they are likely to be difficult to stop due to commercial and employment interests. There are also ethical issues to consider, as many people do not think we have the right to intentionally modify the climate.

As you point out, another significant problem for geoengineering is the issue of regulation – who will decide when and what geoengineering methods to carry out.

Despite the lack of certainty and knowledge around geoengineering and its impacts, the negative impacts appear to outweigh any potential usefulness of most geoengineering methods. Many of the impacts would be difficult or even impossible to undo.

Therefore, there is currently no justification to choose geoengineering over conventional mitigation as a preferred approach to address climate change.

The Ministry for the Environment has no official position on geoengineering at this stage, and New Zealand is not involved in any programme of geoengineering or atmospheric aerosol solar radiation management.

Kind regards

Info at MfE

Ministry for the Environment – Manatu Mo Te Taiao

Website: www.mfe.govt.nz

23 Kate Sheppard Place, PO Box 10362, Wellington 6143

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From: s 9(2)(a)
Sent: Wednesday, 2 March 2016 5:54 p.m.
To: Info at MfE
Subject: RE: Regulation of Geoengineering activity

Roger that. ☺

s 9(2)(a)

From: Info at MfE [<mailto:InfoatMfE@mfe.govt.nz>]
Sent: Wednesday, 2 March 2016 10:33 a.m.
To: s 9(2)(a)

Subject: RE: Regulation of Geoengineering activity

Kia ora s 9(2)(a)

Thank you for your inquiry

Due to the current volume of climate change information requests we expect to respond to your email within 2 weeks

Kind regards,

Info at MfE

Ministry for the Environment – Manatu Mo Te Taiao

Website: www.mfe.govt.nz

23 Kate Sheppard Place, PO Box 10362, Wellington 6143

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From: s 9(2)(a)

Sent: Tuesday, 1 March 2016 12:34 p.m.

To: Info at MfE

Subject: Regulation of Geoengineering activity

Tēnā koe,

I'm looking please for which agency is responsible for regulating geoengineering activity in New Zealand.

The use of geoengineering in one form or another over the decades has been documented, including in New Zealand. See for example:

- "Tsunami bomb NZ's devastating war secret" (30 Jun 2000) http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=14727; and
- <http://www.tgdaily.com/hardware-brief/68475-did-the-us-and-new-zealand-test-secret-tsunami-bomb> (3 January 2013) which connects the tsunami bomb experiment to "High Frequency Active Auroral Research Program" or HAARP activity.

Geoengineering is receiving increasing attention now as a proposed basket of responses to the challenge of climate crisis mitigation/adaptation, for example, as most recently openly discussed (and hotly debated) at the COP21 climate change conference, Paris, 2015.

By email of 29 February, the Environmental Protection Authority advised that geoengineering is "not something we do, probably your best bet would be to contact your local Regional Council." They also suggested I enquire with GNS, which I did. Today, GNS replied by email also confirming their view that Councils held regulatory responsibility. I'm awaiting an EPA reply to my supplementary query as follows:

"So the EPA acknowledges geoengineering is occurring in New Zealand? If so, could you please further advise:

1. If the EPA "manages the decision making process for proposals of national significance under the Resource Management Act 1991" (including applications for resource consent – see <http://www.epa.govt.nz/Resource-management/about-rm/Pages/default.aspx>), are you saying geoengineering has no, or would never have any, national significance?; and
2. Does the EPA believe geoengineering activities (such as solar radiation management or stratospheric aerosol spraying) routinely involve the use of chemical components (like aluminium, sul[ph]uric acid or other) which are hazardous substances as defined by the HSNO Act? And:
 - a. If so, why is do such activities fall outside the EPA's jurisdiction; or

b. If not, why not?"

I would appreciate if MfE could advise what its view is re my supplementary query to the EPA above. Interestingly, I note that MfE's website lists Sulphur dioxide as an air pollutant for which there are management standards and guidelines (when combined with water, sulphur dioxide forms sulphuric acid which is apparently used for stratospheric aerosol spraying: see <http://www.mfe.govt.nz/air/specific-air-pollutants/sulphur-dioxide>).

However, geoengineering has widespread implications, including the prospects for human and environmental harm (and therefore creates potential legal liability uncertainty). Therefore, I imagine that much like for sulphur dioxide and for GMOs (to which geoengineering has been likened to: "*Another way to think of [geoengineering] is as a meteorological equivalent of the highly controversial Genetically Modified Organisms technology.*"), there is some high level policy guidance and monitoring oversight to help either the EPA and/or Councils to make informed regulatory decisions. Therefore, as "the Government's principal adviser on the environment in New Zealand and on international environmental matters" (geoengineering certainly falling under both categories), could MfE also confirm which Government agency is responsible for, or what mechanism produces, monitors and enforces, the overarching geoengineering high level policy and regulatory rules? In other words, if MfE is ultimately responsible, what, specific to geoengineering, has MfE provided by way of (see <http://www.mfe.govt.nz/more/about-us/about-ministry>):

- "environmental management systems, including laws, regulations and national environmental standards
- national direction through national policy statements and strategies
- guidance and training on best practice
- information about the health of the environment."

Ngā mihi,

s 9(2)(a)

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