



Emissions reduction plan process assessment

Date Submitted:	29 March 2022	Tracking #: BRF-1431	
Security Level	Policy and Privacy In-Confidence	MfE Priority:	Urgent

	Action sought:	Response by:
Hon James SHAW, Minister of Climate Change	Confirm process moving forward for the integration of your feedback into the next draft of the emissions reduction plan. Provide further direction where needed.	30 March

Actions for Minister's Office Staff	Return the signed report to MfE.
Number of appendices and attachments # 1	<i>Appendix 1: Traffic light assessment of feedback received in the second draft of the ERP</i>

Key contacts

Position	Name	Cell phone	1st contact
Principal Author	Jacqueline Ruesga		
Responsible Manager	Mark Storey	s 9(2)(a)	✓
Director	Melody Guy		

Emissions reduction plan process assessment

1. This brief:

- seeks direction and confirmation of the process for integrating your feedback.
- provides you with our initial assessment of the process required to integrate your feedback into the third draft of the emissions reduction plan – a revised assessment will follow on 31 March.

Background

2. The second draft of the emissions reduction plan was provided to you on 24 March 2022.
3. You provided detailed chapter-by-chapter direction to officials for inclusion in the third draft of the plan as well as some high-level overarching comments.

Assessment of feedback

4. We are taking your direction and drafting your feedback into the plan. Some of the changes you have requested fall outside of Cabinet's existing mandate and require additional discussions with, and decisions by, lead Ministers.
5. We have provided an initial traffic light assessment of your detailed requested changes to the emissions reduction plan. This initial assessment has been undertaken in a short space of time. This assessment has been done in collaboration with relevant experts and agencies and is included in Appendix 1.
 - [green= within mandate scope and easy to integrate by writing team]
 - [amber= somewhat outside mandate scope and requires additional discussions with experts and lead agencies]
 - [red= outside scope of current mandate and may need significant policy work subject to discussions and decisions by Cabinet].
6. Most actions identified as red would normally require a full policy process prior to Cabinet agreement, including preparation of a Regulatory Impact Analysis to the appropriate standard. For these actions, we recommend that you seek Cabinet agreement to develop policy proposals rather than seeking final approval.
7. Changes identified as green are being addressed by the writing team and will be included in the third draft of the emissions reduction plan. Officials will also work to include changes identified as amber, noting that these changes may be ongoing as details are confirmed following discussions with experts and lead agencies.
8. Where additional Cabinet decisions are needed, as identified in red, officials can highlight these in the third draft of the emissions reduction plan and in the accompanying Cabinet paper that will be covering the plan, with the aim of facilitating your discussion with Ministers.
9. Appendix 1 seeks your direction and confirmation of this process.

Next steps

10. Officials will work with agencies to complete the traffic light assessment in Appendix 1 and will provide you with a revised version of this assessment on Thursday, 31 March.
11. Officials will proceed in the meantime with integrating your feedback and provide you with the third draft of the emissions reduction plan on Thursday 31 March.
12. With your agreement, officials will indicate issues identified as red in the third draft of the emissions reduction plan for ease of reference. They will also be highlighted in the accompanying Cabinet paper to facilitate your discussions with Ministers.
13. On Wednesday 30 March, officials will provide a revised Table B that cross-references the Climate Change Commission's recommendations with the actions of the emissions reduction plan.
14. Ministerial consultation is scheduled to follow pending your agreement of the third draft of the plan. To meet the schedule for Cabinet lodgement by 14 April, the 10 days of Ministerial consultation will need to decrease.

Recommendations

We recommend that you:

- a. **Note** the traffic light assessment of the process required to integrate your feedback into the third draft of the emissions reduction plan.
- b. **Agree** to the proposed process for integrating your feedback and **note** that issues identified as red will be subject to Cabinet discussion.

Yes/No

- c. **Agree** to provide further direction to officials on the process for integrating your feedback.

Yes/No

Signature

Melody Guy Director Climate Change (Emissions Reduction Plan)	
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Hon James SHAW, Minister of Climate Change	
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[Date field]	
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Appendix 1: Traffic light assessment of feedback received in the second draft of the ERP

Proactively released under the Official Information Act 1982

Chapter	Minister of Climate Change comments	Traffic light assessment	Expert & Lead agency Assessments	Minister's Direction
Forewords & Executive Summary	MCC will have a go at this chapter separately			
Our Strategy to Reduce Emissions	MCC will have a go at this chapter separately			
Empowering New Zealanders	Doesn't contain any actions. Delete the chapter. s 9(2)(f)(iv) [redacted] [redacted] [redacted]	Yellow	We will delete the chapter and the writing team will work to incorporate local government through the plan. s 9(2)(f)(iv) [redacted] [redacted] [redacted] [redacted]	
Empowering Māori	Partnership needs stronger language throughout the chapter. Māori are not just one stakeholder among many, Māori are equal partners;	Green		
	It would be good to get a steer from Te Arawhiti if there is language they want us to use in government policy documents like this	Green		
Equitable Transition	s 9(2)(g)(i) [redacted]			
	Actions 1-5 aren't actions, they're outcomes. Other chapters use multi-level numbering. Reframe appropriately, with the bullet points under them as the actions supporting the outcomes.	Green	Will progress alongside further work across the chapter re consistency across all chapters. Outcomes vs actions vs initiatives.	
	s 9(2)(g)(i) [redacted] [redacted]	Red	s 9(2)(g)(i) [redacted] [redacted] [redacted] [redacted] [redacted]	
	Commitments to welfare change: there is one small section that mentions the planned increases to benefits (i.e. who does work programmes from Minister Sepuloni such as Working for Families review, Debt to Govt review work within the transition?);	Green	We will amend to provide reference to which Ministers are responsible for work programmes, such as the Welfare Overhaul.	
How are Housing policies for warmer, drier homes work reflected within this section	Green	Warmer Kiwi Homes is already included, however, this content could be expanded/have greater emphasis		

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	s 9(2)(g)(i)	Green	<p>[REDACTED]</p> <p>[REDACTED]</p> <p>Note that the chapter is framed around four strategic objectives (which were agreed by Cabinet):</p> <ul style="list-style-type: none"> • enabling an affordable and inclusive transition • seizing the opportunities of the transition, including new business and job opportunities • supporting proactive transition planning • building the evidence base and tools to monitor and assess impacts <p>s 9(2)(g)(i)</p>	
	Link in public transport/reduction of fares policies		Initiative is already referenced in the chapter – we can flesh out the content and add greater emphasis.	
	Food security reflected	Yellow	We seek further direction from you for this action, including if you are referring to household food security. There is no long-term work programme in this space.	
	Include policies for renters (not just home owners);		<p>Energy and industry chapter includes an action to investigate the potential for additional programmes for improving the energy performance of existing buildings and refers to the building and construction chapter focus area Improve Building Energy Efficiency.</p> <p>The building and construction chapter includes an action to explore how incentives, support or regulatory requirements could reduce existing residential and non-residential buildings' emissions, while making buildings warmer and drier. This is likely to include consideration of the issues identified by you.</p> <p>We can make these linkages clearer in the next draft.</p>	

Chapter	Minister of Climate Change comments	Traffic light assessment	Expert & Lead agency Assessments	Minister's Direction	
Emissions Pricing	Be more explicit that there is a fundamental change of policy from lower cost abatement anywhere in the world, to gross domestic reductions and only offset what can't be reduced, relying on international only to fill any gaps that can't be filled once domestic options have been exhausted	[Red]	<p>We are seeking further clarification from you as to whether this direction is referring to the approach being taken towards meeting the NDC or domestic targets. This may help to some extent address comments raised below.</p> <p>More broadly, Forestry Ministers have agreed there should be a balance of gross and net supported by emissions pricing, not 'prioritising gross' (prioritising gross has been agreed across the plan, but there is a distinction between emissions pricing and broader emissions reduction strategy).</p> <p>This will need Cabinet agreement. s 9(2)(g)(i) [Redacted]</p>		
	s 9(2)(f)(iv) and s9(2)(g)(i) [Redacted]		[Red]	[Redacted]	
	s 9(2)(f)(iv) and s9(2)(g)(i) [Redacted]			[Red]	[Redacted]
	Add an action (or modify action 2.1) for MfE to review ETS unit supply and demand settings by the end of 2022 (rec.11 Provisional 11.1), including NDC		[Green]		
	Under Action 3, include reference to reviewing institutional arrangements		[Yellow]	Assumed this refers to how institutional arrangements will work (eg, role of Financial Markets Authority). Fine to include as this will be assessed as part of the Market Governance work programme.	
	s 9(2)(f)(iv) and s9(2)(g)(i) [Redacted]	[Yellow]	[Redacted]		
Funding & Finance	Bring actions from Table 1 forward into the chapter	[Red]	We would like to confirm that Table 1 refers to the Actions Table.		

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	s 9(2)(f)(iv) and s9(2)(g)(i) [Redacted]	[Yellow]	[Redacted]	
	Add an action on Government owned funds (NZ Super Fund, ACC and Government Superannuation Fund) going for net-zero	[Green]	Assuming this refers to adding a reference to existing policy, this could be added as an existing action. Anything going beyond existing policy (see link below) would require Cabinet agreement (and traffic light colour would change). https://www.beehive.govt.nz/release/new-investment-framework-aligns-govt%E2%80%99s-2050-carbon-neutrality-goal	
	s 9(2)(f)(iv) and s9(2)(g)(i) [Redacted]	[Red]	[Redacted]	
	Add an action committing Government to joining the Sustainable Finance Forum	[Red]	This Forum no longer exists and has been superseded by the Centre for Sustainable Finance. The Government is already engaging with the Centre – but it's a separate organisation so government can't "join" in any obvious way. Beyond current engagement would likely need a Cabinet agreement for anything more formal.	
	Add an action requiring the Government to respond to the recommendations of the Aotearoa Circle's Sustainable Finance report	[Red]	This will need Cabinet agreement. It would be possible to commission Government to respond but we need to work out how this is resourced and who is responsible for doing so. Given the time that has elapsed since the report was published, it may not be an efficient use of resources to respond at this stage – we understand a formal govt response is not expected by the Circle.	
	s 9(2)(f)(iv) and s9(2)(g)(i) [Redacted]	[Red]	[Redacted]	
	s 9(2)(f)(iv) and s9(2)(g)(i) [Redacted]	[Red]	[Redacted]	
	s 9(2)(f)(iv) and s9(2)(g)(i) [Redacted]	[Yellow]	[Redacted]	
Planning and Infrastructure	s 9(2)(f)(iv) and s9(2)(g)(i) [Redacted]	[Yellow]	[Redacted]	

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	New urban developments to be planned around public and active transport, provide at least medium density residential yield, and enable community amenities and job opportunities in the area.	Green		
	Adaptation and natural hazards – while reducing emissions planning system should also be seeking to avoid development in vulnerable areas; and provide tools for community conversations and regulatory intervention around managed retreat;	Green		
	Chapter is silent on Commission recommendations 16.1, 16.2 – add new actions to deliver on these recs	Yellow	These recommendations are partially addressed, for example rec 16.1 is partially underway through urban growth partnerships with iwi/Māori which are included in the chapter. We will give further consideration as to how and whether these recommendations can be addressed more fully.	
	It's unclear how the actions deliver on Commission recommendations 16.3, 16.4, 16.5, 16.6, 16.7 – should just be a matter of making the language more explicit	Green		
RSI&T	Missing are examples of what these initiatives can facilitate and how they can be scaled up – particularly in relation to the Climate Innovation Platforms. What will these achieve? This also applies in relation to many of the wider initiatives. It is difficult to visualise/conceptualise outcomes;	Yellow	We do not have any NZ examples, however, we could use hypothetical or international examples.	
	Strengthen actions on what steps are needed to minimise the lag between something being proven effective, and being adopted widely (e.g. cross laminated timber instead of concrete in mid-rise buildings; shifting from gas to electric for home heating, ebikes instead of cars for short urban trips, etc). Mix of regulatory, infrastructure, and funding levers can influence the speed of transition – settings can be barriers or accelerators.	Yellow	Would need further work with agencies Could link to climate innovation platforms and which involve pulling all settings in tandem.	
	Needs to consider role of Crown Research Institutes.	Yellow	The role of CRIs can be incorporated into the chapter. New work if considering role of CRIs (vs, describing)	
	s 9(2)(a) [redacted] s 9(2)(f)(iv) [redacted] [redacted] [redacted]	Red	s 9(2)(f)(iv) [redacted] [redacted] [redacted]	
Circular and bio economies	Circular Economy piece needs to be lined up much better with Waste chapter; the two are flip sides of the same coin	Green	Can improve consistency of language between chapters	

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	<p>s 9(2)(f)(iv) and s9(2)(g)(i)</p> <p>[Redacted]</p>	[Red]	<p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p>	
	<p>Point 9.4 of the Appendix 2 table – to be clear whether biomass uptake programme is intended to replace coal and gas only, or also new use (should be the first option);</p>	[Red]	<p>Policy development required. Strategy needs to be developed to frame choices on use of bioresources and connected with energy strategy</p>	
	<p>Text needs a good edit to remove jargon;</p>	[Green]		
	<p>What do private sector need for action, i.e. Fletcher Residential has suggested establishing a circular economy hub to minimise waste in the construction and demolition sector. C&D sector accounts for more than 40% of waste to landfill. (Suggest add establishment of a circular economy “hub” as a new action?);</p>	[Yellow]	<p>s 9(2)(f)(iv)</p> <p>[Redacted]</p>	
	<p>It's not clear how the actions deliver on the Commission's recommendations 14.1, .14.2, 14.3, 14.4, 15.1, 15.2, 15.3, 15.4 – should just be a matter of making the language more explicit</p>	[Green]	<p>Able to address language changes. Eco-park vehicle for active collaboration between Māori, industry and govt.</p> <p>But governance and accountability not yet determined. s 9(2)(f)(iv)</p> <p>[Redacted]</p>	
Nature	<p>Move this chapter to after 'Māori' and before 'Equitable Transition'.</p>	[Green]		
	<p>Action 1 isn't an action and just repeats language used elsewhere. Delete</p>	[Red]	<p>We will remove as an action, however, consider the principle around climate and biodiversity policy needing to align as the core principle of this chapter and will retain it in the chapter, and in the guiding principles of ERP.</p>	
	<p>Action 2 isn't phrased as an action, but could be – what would need to happen in order for nature-based solutions to be prioritised across planning and regulatory systems? Is that the ANZBS?</p>	[Yellow]	<p>We will work with the biodiversity team at DOC to incorporate this feedback.</p>	
	<p>s 9(2)(f)(iv) and s9(2)(g)(i)</p> <p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p>	[Red]	<p>[Redacted]</p> <p>[Redacted]</p> <p>[Redacted]</p>	

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	Action 4 is the substance of the chapter, as with some other chapters, the headline isn't an action, it's an outcome – the multi-level bullets underneath are the actions that support the outcome			
	Action to Improve national soil emissions estimates is listed also as Action 4, but should just be an action under Integrated Work Programme?			
	Section on marine is good but actions are limited to research. Needs greater commitment to proceeding with initiatives supported by preliminary research. Iwi role also needs to be brought into this section;		There is a general comment that could feed into regulatory and policy settings. We will need to explore with agencies if any more work is happening on blue carbon. Fine to add reference to Iwi role.	
	Appendix 2 table does not include action points for marine – this is mentioned in the chapter, needs to carry across;		We can add research initiatives in in Actions Table, but worth nothing they are often not central government actions.	
	Wetland content should be stronger on restoration as well as preventing further loss;		We will work with the NPS-FM team to more clearly articulate ongoing work on wetland restoration.	
	Māori partnership content needs to be integrated throughout – e.g. under the heading “Our biodiversity work can help realise our climate goals”. Tangata whenua section could go earlier in the chapter;			
International Cooperation	Actions seem to have disappeared. There's only narrative now – bring the actions back in.		International cooperation comments are able to be addressed through editing and inclusion of actions.	
	Need stronger framing about the link between the domestic and the international		Note that this will require the chapter length increasing.	
	Language is very weak (“The Government has choices about where to prioritise the investment in international cooperation” The Government has actually already made those choices about prioritisation and those choices should be spelled out here)			
	Re action 4: (from first edition) point needs to be communicated effectively in public on release of the ERP. There is a need to use offshore mitigation in order to meet international targets, because the independent body for determining NZ domestic emissions budget sets it at lower level;			
	No reference/action points in relation to international ‘biodiversity beyond national jurisdiction’ treaties;		We consider this would likely to be best placed in biodiversity chapter, and cross referenced (e.g. similar to agricultural or transport actions which involve international cooperation). We can progress based on this approach.	

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	Trade agreements section has no action points relating to Trade For All recommendations on climate;		This can be addressed through editing and inclusion of actions.	
Transport	s 9(2)(f)(iv) and s9(2)(g)(i) [redacted]		[redacted]	
	Action 2.3 EV charging infrastructure needs to also look at incentives for installing home charging infrastructure, not just the inter-city network		<p>s 9(2)(f)(iv) [redacted]</p> <p>[redacted]</p> <p>[redacted]</p> <p>[redacted]</p> <p>[redacted]</p> <p>[redacted]</p> <p>We can more clearly show the initiative in 2.3 to be:</p> <p>“Completing a national EV charging infrastructure strategy to set out the Government’s vision and policy objectives around EV charging (both public and private) over future emissions budget periods.”</p>	
Energy and Industry	Lots of language about 2050, not so much about 2025, 2030 & 2035, i.e. the emissions budget periods			
	Need to bring in Transpower’s estimates of total new generation likely to be needed (i.e. additional 70%)			
	Need to show how much can be achieved with efficiency, and how much we’ll need distributed grid to support utility scale generation, particularly with point-of-use generation for EVs atc (i.e. home and work solar)		We are unable to incorporate this. Have checked in with MBIE modelling team and they have indicated that information is not available on this issue.	
	Emphasis for dry year electricity storage is placed on pumped hydro, bioenergy, geothermal energy and hydrogen. But ignores the important role of solar;		NZ Battery is looking at battery options, note that solar is not a storage technology.	
	s 9(2)(f)(iv) and s9(2)(g)(i) [redacted]		[redacted]	

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	More clarity is needed on how renewable generation will be enabled through RM reforms;		This is an RM review policy issue and could be addressed in the planning chapter. Note that E&I chapter includes an action on review of national direction tools relating to renewable electricity.	
	In first edition, chapter mentioned, "We are looking to develop optimal regulatory settings to enable investment in offshore renewable energy (such as offshore wind farms)". This needs to come back into second edition, and be supported with specific action.			
	Also, regulation improvements need to ensure improvements for all, not just in area off offshore renewable energy.		Note current chapter draft includes a range of actions relating to regulatory settings for the electricity system (focus area 2).	
	Ensure ease for local and community scale wind generation as well; Community energy and distributed grids will be an important Just Transition measure, particularly in rural communities.		We can emphasise the relevant actions below that are outlined in the current chapter draft. Initiatives in this area: Māori and public housing fund and proposed expansion, EA work programmes on distribution system issues, RM national direction review. These actions are included in the chapter.	
	How do we address household renewable energy generation for private renters, and the energy efficiency of rented homes. In relative terms, there are very few low-income owner-occupiers. This means that many people will not benefit from improvements to Warmer Kiwi Homes with additional subsidies for solar panels, double glazing, LEDs etc.. One option to explore is the expansion to Healthy Home Standards and better monitoring and regulation;		Energy and industry chapter includes an action to investigate the potential for additional programmes for improving the energy performance of existing buildings and refers to the building and construction chapter focus area Improve Building Energy Efficiency. The building and construction chapter includes an action to explore how incentives, support or regulatory requirements could reduce existing residential and non-residential buildings' emissions, while making buildings warmer and drier. This is likely to include consideration of the issues identified by Minister Shaw.	
	s 9(2)(f)(iv) and s9(2)(g)(i) [Redacted]		[Redacted]	
	Funding to remove coal boilers, but no specifics on ending mining for coal in New Zealand;		No current policy work underway. Would need to discuss with Minister of Energy and Resources. Further policy work would be required.	

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	<p>Te Tiriti framing could be stronger, with specific instruments for shared decision-making. Every policy consideration needs a Tiriti lens;</p> <p>With that said, there appear to be some positives, including Just Transition work in Taranaki, the Māori and Public Housing Renewable Energy Fund, and commitment to recommendations of the Climate Change Commission report to ensure that emission reductions plan is rooted in Treaty principles.</p>		<p>This is a question that is broader than the energy chapter and should be considered across the ERP.</p> <p>For the energy and industry chapter, a Te Tiriti lens has been noted where it is important for this to be highlighted, as noted by Minister Shaw in comments in the row below.</p> <p>For other actions in the chapter, policies will be developed working with iwi/Māori in accordance with the Te Arawhiti engagement framework.</p>	
Building and construction	Right direction but could do with more ambition;			
	Add an action to increase and enforce Healthy Homes Standards, e.g. bring in a rental warrant of fitness regime		<p>Can easily reference MBIE enforcement of Healthy Homes Standards (including provision of \$16 million in Budget 2021 for proactive investigation and enforcement of the Healthy Homes Standards) and their rollout to all private rentals being completed by 1 July 2024.</p> <p>Increasing existing Healthy Homes Standards is RED - Cabinet decisions and policy work required. s 9(2)(f)(iv)</p> <p>_____</p> <p>_____</p> <p>_____</p>	
	Extend Healthy Homes regulations to replacing gas appliances with electric (there are health benefits from air quality as well as lower emissions and household costs)		<p>Cabinet decisions and policy work required. This action would likely have significant impacts for rental market supply and generate confusion for sector</p> <p>s 9(2)(f)(iv)</p> <p>_____</p> <p>Requirements for acceptable heating appliances in existing HHS settings will result in some unflued gas appliances (e.g. LPG heaters) being decommissioned and replaced with other heating sources.</p>	
	Should be clear that mandatory energy ratings should not just be for public/commercial buildings, but larger residential buildings as well eg apartment blocks +2,000m2;		<p>Can be included in scope of 'energy performance programmes' action without further Cabinet decisions at this time.</p> <p>Cabinet decisions will be required in future to agree specific eligibility criteria for energy performance certificates / programming. Min Shaw's suggestions will be included in scope of policy work to inform these future Cabinet decisions.</p>	

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	<p>Legislation enabling mandatory energy ratings should allow residential homes to be brought into the scheme by regulations, in the interim should bring in an ability to have a "healthy home certificate" that would drive up consumer demand to rent/buy a property that had such a certificate;</p>		<p>Can be included in scope of 'energy performance programmes' and 'behaviour change programming' actions without further Cabinet decisions at this time.</p> <p>Cabinet decisions will be required in future to agree specific eligibility criteria for energy performance certificates / programming, and any transitional arrangements such as voluntary 'healthy homes certificates.' Min Shaw's suggestions will be included in scope of policy work to inform these future Cabinet decisions.</p>	
	<p>Warmer Kiwi Homes programmes should be funded to do more properties;</p>		<p>§ 9(2)(g)(i)</p>	
	<p>Change eligibility of Warmer Kiwi Homes from the area to the household (i.e. poor houses in wealthier areas don't qualify, wealthier houses in poorer areas do)</p>		<p>This would require further policy work and a discussion with the Minister of Energy & Resources.</p>	
	<p>Allow homes that meet certain levels of energy efficiency/low carbon construction to have preferential treatment through consenting processes;</p>		<p>This would require significant new policy work and legislative change. It could also have unintended consequences (e.g. in terms of wider housing affordability or equity) § 9(2)(f)(iv)</p> <p>_____</p> <p>_____</p> <p>An action about the consent system review exploring barriers and incentives for low emissions construction is included in Table A.</p>	
	<p>Establish a Zero Carbon Healthy Homes Hub to drive innovation, coordinate funding for people to retrofit properties, and create a national plan;</p>		<p>This is a promising idea based on overseas examples. It would require significantly more policy work, funding and engagement/partnership with sector to develop, which is not viable within timeframes for the first ERP.</p> <p>In-principle decisions could be sought from Cabinet to explore this initiative in the first ERP or to include this in future ERPs.</p>	

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	More specific initiatives around replacing concrete (as a very high emission product) in building construction and replacing with timber	Yellow	<p>Replacement approach conflicts with outcomes-based, material agnostic policy to building and construction emissions reduction and would result in significant disruption in material supply chains.</p> <p>However, a number of actions could support innovative use of timber in buildings, including through the Wood Processing and Manufacturing ITP (as referenced in the Forestry Chapter), through improving information to building owners and the sector, and in the newly established Timber Design Centre of Excellence. We could bring this approach out more clearly in this chapter.</p> <p>Innovation- and market-based RSI&T actions (e.g. Climate Innovation Platforms) and regulatory actions (embodied carbon caps) will support use of lower emissions materials and alternatives with less market and industry disruption than materials-based initiatives.</p>	
	More specific initiatives around reducing construction waste through product stewardship and priority products;	Red	<p>Further policy work and Cabinet decisions would be required to include this action.</p> <p>There is potential to explore feasibility of developing a product stewardship scheme for certain construction products (e.g. treated timber) as part of existing B&C action to "Explore broader building and construction waste initiatives."</p> <p>Prior to declaring a priority product for regulated product stewardship, public consultation is required under the Waste Minimisation Act which could take ~1 year. Following this, scheme development requires ~3years.</p>	
Waste	Needs to link more closely with the Circular Economy chapter	Green	We can add additional content to the waste chapter but note that several requests for additional content will increase the length of the waste chapter.	
	Gap for considering labelling requirements for compostable packaging that will replace some plastics, and steps needed to avoid cross contamination of compostable and recyclables as the use of the compostable alternatives to plastic packaging increases	Red	<p>Further policy work and Cabinet decisions would be required to include this.</p> <p>This is part of a different work programme, not part of the ERP, as labelling won't have a bearing on emissions.</p>	
	Expand on initiatives to reduce waste	Green	<p>We can add additional content to the waste chapter. s 9(2)(f)(iv)</p> <p>██</p> <p>██</p> <p>We seek your direction on where more information is needed, for example information on existing initiatives (e.g., expansion of the waste disposal levy, product stewardship, Waste Minimisation Fund) or new initiatives.</p>	

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	<p>Mandatory product stewardship and right to repair policies can keep products in use longer, cutting down on recycling and reprocessing emissions.</p>		<p>Right to repair narrative could be pulled into the circular economy chapter § 9(2)(f)(iv) [REDACTED]</p> <p>The circular economy or waste chapter could include additional references to processing emissions and how these could be measured and minimised in the future, etc.</p> <p>The GHG inventory measures emissions from waste disposal. The ERP and waste sub-sector target are focused on reducing methane emissions generated by organic material disposed to landfill. Consumption emissions are not yet measured. Recycling processing emissions generated in NZ fall under the energy sector emissions.</p>	
	<p>Chapter is largely silent on emissions from waste other than methane, e.g. energy emissions from glass or paper recycling.</p>		<p>Recycling processing emissions generated in NZ fall under the energy sector emissions.</p> <p>The GHG inventory measures emissions from waste disposal. The emissions reduction plan and waste sub-sector target are focused on reducing methane emissions generated by organic material disposed of to landfill.</p>	
	<p>Add an action to support the Food Secure Communities Programme "Focus area 2 – increasing the amount of organic waste diverted from landfill" – note in relation to food rescue, sidebox discusses the Food Secure Communities Programme</p>		<p>§ 9(2)(f)(iv) [REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>Food rescue has had some funding previously through the Waste Minimisation Fund. The preferred approach would be to avoid and minimise surplus food within the supply chain, rather than divert it.</p> <p>The emissions reduction benefits from reducing food waste are small, relative to other actions § 9(2)(g)(i) [REDACTED]</p> <p>[REDACTED]</p>	
	<p>"Focus area 4 – exploring bans or limits to divert more organic waste to landfill" § 9(2)(g)(i) [REDACTED]</p>		<p>A ban is being explored. More data and policy work is needed prior to introducing a ban. A proposed date has been signalled, but not committed to, as per the agreed waste work programme.</p> <p>The Waste Minimisation Act requires alternative disposal options to be in place before a ban is introduced.</p> <p>This action title has been updated to: 'Investigate banning organic waste from landfill by 2030'.</p>	

Chapter	Minister of Climate Change comments	Traffic light assessment	Expert & Lead agency Assessments	Minister's Direction
	<p>"Focus area 5 – increasing the amount of gas captured at landfill" – this should be explicitly limited to legacy capture of methane from organic waste that has already been disposed of</p>		<p>This change would be inconsistent with the Commission's advice and the agreed Waste work programme.</p> <p>This action title has been updated to 'Increase the capture of gas from landfill' to better reflect that is not about an ongoing gas supply.</p> <p>Until alternatives for disposal or a ban are in place, food waste will still enter landfills. This means that LFG capture needs to be applied at municipal landfills currently accepting organic waste – not just legacy landfills.</p>	
F-gases	<p>s 9(2)(g)(i) [Redacted]</p>		<p>[Redacted]</p>	
	<p>Chapter text needs content on regulated product stewardship, especially crucial for end of life capture. Mentioned in the table, needs to be carried across;</p>		<p>We will add this content and the lifecycle diagram in order to show where our ERP proposals sit, and where product stewardship sits compared to these. We could also add the final recommendations report from PS working group and anticipated timelines to Cabinet.</p>	
Agriculture	<p>Under Why reducing agriculture emissions is important, lead with the fact that agriculture is the sector most exposed to the effects of climate change through drought, flood and fire risk – point to data about the increasing cost of these weather events on farming</p>			
	<p>s 9(2)(g)(i) [Redacted]</p>		<p>[Redacted]</p>	
	<p>Why has impact analysis here been done based on farm-level pricing when the baseline assumptions for agriculture emissions reduction chapter have been done based on processor-level ETS pricing?</p>		<p>We have modelled the backstop as there is no preferred option for HWEN.</p>	

Chapter	Minister of Climate Change comments	Traffic light assessment	Expert & Lead agency Assessments	Minister's Direction
	Good to see 'Fit for a Better World' referenced now – how does this flow through to the actions?		We can provide some more actions from the FFBW action plan.	
	Lots of redundant, passive language, e.g. "Working towards systems to support a pricing mechanism" could become "Develop a pricing mechanism". Also, we're considering pilots? Not conducting pilots? Just considering them?		Could be adjusted with new guidance around Budget language. Note the agriculture chapter was an example of the previous Budget guidance, so will be updated to be definitive for B22 initiatives.	
	Synthetic nitrogen fertiliser is not mentioned in this chapter, either in context of current drivers of emissions, or in context of new actions;		We will add text on GHG guidance supporting best practice use.	
Forestry	§ 9(2)(f)(iv) [redacted];		§ 9(2)(f)(iv) [redacted]	
	A lot of discussion of Government considering work, but not much focus on actions taking/taken. Would be good to trim the chapter to be more focused on what <i>is</i> happening;		§ 9(2)(g)(i) [redacted]. Can edit to tighten the chapter.	
	Industry needs to play a strong role in native afforestation, rather than leaving this to Govt;			
	Exotic overplanting = increased wildfire risk and the need for this to be proactively managed;			