

Annual updates to the New Zealand Emissions Trading Scheme limits and price control settings for units 2023

Summary of submissions



Ministry for the
Environment
Manatū Mō Te Taiao



Te Kāwanatanga o Aotearoa
New Zealand Government

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This document may be cited as: Ministry for the Environment. 2023. *Annual updates to the New Zealand Emissions Trading Scheme limits and price control settings for units 2023: Summary of submissions*. Wellington: Ministry for the Environment.

Published in August 2023 by the
Ministry for the Environment
Manatū Mō Te Taiao
PO Box 10362, Wellington 6143, New Zealand
environment.govt.nz

ISBN: 978-1-991077-79-0

Publication number: ME 1789

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Introduction

From 19 May to 16 June 2023, the Government consulted on proposals to update New Zealand Emissions Trading Scheme (NZ ETS) unit settings for the period 2024 to 2028. This included two webinars held on 24 and 29 May 2023.

This report summarises the views expressed from public consultation on updates to NZ ETS unit settings, described in the consultation document *Annual updates to the New Zealand Emissions Trading Scheme limits and price control settings for units 2023*. It does not provide an analysis of those views or recommendations in response to them. Any recommendations in response to these submissions will be made through policy development and advice to the Government.

Why do we need to update New Zealand Emissions Trading Scheme limit and price control settings for units in 2023?

The NZ ETS is one of the Government's main tools to address climate change. The NZ ETS supports and encourages domestic and global efforts to reduce greenhouse gas emissions. Its purpose is to help Aotearoa New Zealand to meet its international obligations under the Paris Agreement, its 2050 target, and emissions budgets. The Government sets the number of units supplied into the scheme over time. This limits the quantity of greenhouse gases that emitters can emit, in line with Aotearoa New Zealand's emission reduction targets.

Aotearoa New Zealand's first emissions budgets were set in 2022. These place limits on the emissions that Aotearoa can produce for 2022–25, 2026–30, and 2031–35. The Government also published the first emissions reduction plan (ERP) on 16 May 2022. The ERP describes how Aotearoa is going to meet the first (2022–25), second (2026–30) and third (2031–35) emissions budgets and progress towards its 2050 target. Emissions pricing, through the NZ ETS (and the related synthetic greenhouse gas levy), is a critical part of the ERP policy package.

The objective of updating NZ ETS limits and price control settings for the years 2024–28 is to provide increased certainty on unit supply and comply with the statutory requirement that unit settings cover each of the next five calendar years at all times. This will support the efficient and accurate operation of the NZ ETS and align the settings, as much as possible, to help Aotearoa meet its emissions budgets and targets.

He Pou a Rangi – Climate Change Commission (the Commission) has provided its annual advice on NZ ETS limits and price control settings for units. The Minister of Climate Change must consider this advice as part of the process of updating the settings.

Feedback from consultation on these settings fell broadly into two categories, those supportive of the Commission's recommendations and those supportive of retaining status quo settings. This feedback is further explored below.

This document summarises the views expressed by submitters in response to the consultation document *Annual updates to the New Zealand Emissions Trading Scheme limits and price control settings for units 2023*. This will inform policy development and advice to the Government on NZ ETS limits and price control settings.

Who responded to the consultation

We received 61 submissions through our consultation tool, Citizen Space, and email.

Some form submissions were received as part of this consultation. These are small in number, however, and have been treated as individual submissions for the purpose of this consultation.

The [appendix](#) includes data showing the preferences of submitters where discrete, selectable options were provided under questions.

Table 1 sets out the number of submissions received from individuals and groups.

Table 1: Number of submissions by submitter group

Submitter type		Number
Individual		19
Organisation (respondents were able to self-identify with multiple options, so numbers may not add to 100%)		42
Academic or subject matter expert	10	
Iwi/hapū	0	
Local government	1	
Business	32	
Industry body	5	
Non-governmental organisation	4	
Registered charity	4	
Other/not applicable	17	
Total		61

Decisions on the New Zealand Emissions Trading Scheme unit settings announced in 2022

Question 1: Do you think the decisions on NZ ETS unit settings announced in December 2022 had any impact on NZ ETS market behaviour?

Of those submitters who selected an option in response to this question, all but one agreed that the decisions in December 2022 had an effect on NZ ETS market behaviour. The final submitter from this group was unsure.

This trend is mirrored in substantive responses by submitters, including as part of the survey or in separately uploaded documents:

- Most submitters believed the decisions made by Cabinet at the end of 2022 created uncertainty and lost confidence in both the market itself and the policy decisions underlying it.
- Many submitters referenced Cabinet not adopting (in part or in full) the advice of the Climate Change Commission (the Commission) as causing or contributing to this uncertainty and lost confidence.
- One submitter articulated this shared position, despite whether participants in the NZ ETS supported the Commission's advice or not, as follows:

Whilst participants were divided on whether the CCC's [Climate Change Commission's] recommendations should be accepted in part or in their entirety, the fact that the price settings were completely dismissed was considered a wider reaching signal that the recommendations of the CCC held less weight than previously thought. This created uncertainty around the shape and regulatory stability of the market going forward.

New Zealand Emissions Trading Scheme unit settings

Question 2: Do you think that the proposed update to auction volumes to reflect a change in forestry emissions outside the NZ ETS is sufficient to allow unit settings for 2024 and 2025 to be updated?

Of those submitters who selected an option in response to this question, most agreed that the proposed update to auction volumes is sufficient to update 2024 and 2025 unit settings. Several submitters were unsure, and a minority did not believe this proposal was sufficient to allow an update of settings.

Question 3: What other special circumstances, if any, do you think exist that might enable updating NZ ETS unit settings for 2024 and 2025?

This question did not provide discrete options for selection.

Question 4: If there are special circumstances, do you think updates to NZ ETS unit settings for 2024 and 2025 are justified and should be made?

Of those submitters who selected an option in response to this question, most agreed that the updates to 2024 and 2025 NZ ETS unit settings are justified and should be made if there are special circumstances. Only one submitter was unsure, and one submitter did not agree.

Question 5: Do you think that updates to NZ ETS unit settings for 2024 and 2025 should occur if NZUs from the cost containment reserve are sold at the June NZ ETS auction? Note, the Commission recommends that settings for 2024 and 2025 are updated in this situation.

Note: New Zealand Units (NZUs) from the cost containment reserve (CCR) were not sold at the June 2023 NZ ETS auction.

Of those submitters who selected an option in response to this question, most agreed that updates to 2024 and 2025 NZ ETS unit settings should occur if the June 2023 auction includes sale of NZUs from the cost containment reserve. A few submitters were unsure, and one submitter did not agree.

Detailed feedback on questions 2–5

Substantive responses from submitters as part of the survey or in separately uploaded documents, which tended to cover issues across these questions, provided the following perspectives:

- Views from submitters were divided regarding whether changes to auction volumes based on updates to forestry estimates is a sufficient reason for updating settings for years 2024 and 2025. Most supported updates to these years for various reasons. Some supported it as a pathway for correcting settings adjustments made in 2022 that they believe to be out of line with emissions budgets. Others supported changes to the first two years because the updated estimates have “a significant effect on the proportion of emissions budgets that can be allocated to economic activity covered by the ETS” (Oxfam).
- A smaller but significant group of submitters did not support changes to years 2024 and 2025. Some in this group supported the Commission’s analysis noting that its reasoning for not recommending updates to these years was sound. Others had concerns regarding the impact changes would have on regulatory certainty and on businesses.
- Other reasons were given by some submitters to support updates to these years such as the decline for the 2023 March and June auctions as well as the drop in the secondary market price for NZUs. A few submitters held the opinion that cyclone Gabrielle could be considered a force majeure.
- Feedback for submitters showed majority support for updates to 2024 and 2025 if the Government decided special circumstances existed that allowed updates to these years or if the CCR is sold.

Updating New Zealand Emissions Trading Scheme limits for units

Question 6: Do you think the Commission’s updated estimates of forestry emissions outside the NZ ETS are accurate?

Of those submitters who selected an option in response to this question, most agreed that the Commission’s updated estimates of forestry emissions outside the NZ ETS were accurate. Several submitters were unsure, and a minority did not believe this proposal was sufficient to allow an update of settings.

Substantive responses from submitters, as part of the survey or in separately uploaded documents, provided the following perspectives:

- Most submitters were satisfied that the Commission’s forestry estimates were accurate.
- Two business submitters questioned the reliability of the Ministry for Primary Industries data used in these estimates.

Question 7: Do you think that an update to calculations, and a corresponding reduction in auction volumes, should be made to reflect this updated estimate?

Of those submitters who selected an option in response to this question, most agreed that this revised estimate should be reflected in an update to calculations and a reduction in auction volumes. Several submitters were unsure, and none disagreed.

Substantive responses from submitters, as part of the survey or in separately uploaded documents, provided the following perspectives:

- Most submitters agreed a reduction in auction volumes to reflect the updated estimates was the best course of action. Reasons given for making this adjustment were that it maintains the integrity of the NZ ETS through the use of accurate and up-to-date data and provides the best chance of meeting Aotearoa New Zealand’s emissions reduction targets.
- Some submitters were opposed to making the adjustment to auction volumes and stated this could pose a risk to necessary market liquidity and drive NZU prices higher.
- A few submitters took a broad approach to the consultation by opposing all auction and surplus stockpile volume reductions due to economic concerns regarding the impacts on businesses and the cost of living.

Question 8: Do you think that reductions in auction volumes and limits should occur to reflect the identified discrepancies between emissions reported in the Greenhouse Gas Inventory and the NZ ETS?

Of those submitters who selected an option in response to this question, most agreed that auction volumes and limits should occur to reflect discrepancies with the Greenhouse Gas Inventory. A few submitters were unsure, and one submitter did not agree.

Substantive responses from submitters, as part of the survey or in separately uploaded documents, provided the following perspectives:

- Feedback from various submitters, including individuals, non-governmental organisations, businesses, and industry participants, showed strong support for a reduction in auction volumes to address the technical discrepancy.
- Some submitters supported the adjustment on the condition that the nature of the discrepancy was well understood.
- Submitters were of the opinion that the Greenhouse Gas Inventory and NZ ETS should be aligned.
- A smaller group of submitters, mainly from business and industry, did not support any adjustment until a greater understanding has been achieved of the discrepancy.
- Some submitters supported no change to volumes at all, due to economic concerns.

Question 9: Do you think the status quo approach to stockpile reduction should be retained?

Of those submitters who selected an option in response to this question, the split was fairly even between agreement, disagreement, and uncertainty about whether the status quo approach should be retained to stockpile reduction, with a slight favour for disagreement.

Substantive responses from submitters, as part of the survey or in separately uploaded documents, provided the following perspectives:

- Most submitters were in favour of retaining the status quo approach to the stockpile reduction, with the addition of the Commission's recommended discrepancy adjustment step. These submitters view the existing stockpile as a risk to achieving emissions budgets.
- Some submitters stated that the alternative method, of addressing discrepancies as part of the annual updates to stockpile estimates, risks over supply of units in the short term, and no guarantee exists that these can easily be reduced from the stockpile in future.
- A small number of submitters from business and industry did not support the Commission's discrepancy adjustment. They held that reductions to the stockpile in any form pose a risk to market liquidity and the ability for participants to secure the NZUs needed to meet their obligations.
- Genesis Energy stated that it believed the Commission had over-estimated the surplus component of the stockpile and much of this was hedged for future surrender obligations.

Question 10: Should a new sub-step be added this year to address projected impacts on surplus stockpile liquidity rather than addressing it through annual updates to estimates of surplus stockpile liquidity?

Of those submitters who selected an option in response to this question, most agreed a new sub-step should be added to address surplus stockpile impacts rather than addressing these through annual updates. Several submitters were unsure, and a few submitters did not agree.

Substantive responses from submitters, as part of the survey or in separately uploaded documents, provided the following perspectives:

- Submitters generally support aligning with the Commission’s advice, with several citing the restoration of confidence in the market and ensuring alignment with emissions budgets.
- A smaller number of submitters stated that they did not support this as a stockpile reduction measure (with one opposing all stockpile reduction measures entirely), they questioned the accuracy of the Commission’s surplus estimates, and cited concerns about unintended consequences and price increases if the stockpile reduces.

Question 11: Should adjustments to auction volumes be made to address historic actions?

Of those submitters who selected an option in response to this question, most agreed that historical actions should be reflected in adjustments to auction volumes. Several submitters were unsure, and a few did not agree.

Substantive responses from submitters, as part of the survey or in separately uploaded documents, provided the following perspectives:

- A variety of views were expressed on addressing historic actions, although general support of the Commission’s recommendations as they relate to this issue remained a strong theme.
- The split responses were largely driven by uncertainty around the intended meaning of ‘historic actions’. Some submitters interpreted this as changes to estimates of past emissions; some as past decisions made by the Government (eg, not to adopt the Commission’s advice); and a significant number explicitly called for clarification of terminology before any decisions are made in this space.

Question 12: What do you think of the methodology used to calculate auction volumes, including on each specific step?

This question did not provide discrete options for selection.

Substantive responses from submitters, as part of the survey or in separately uploaded documents, provided the following perspectives:

- General support was expressed by most submitters for aligning with the Commission's recommendations.
- Where submitters commented in detail on the accuracy and/or validity of the methodology, several expressed that the details of the methodology itself were acceptable, but their use or implementation is where it falls down. Subsequent comments varied between support of the methodology and the steps, versus taking approaches outside of tweaks to auction volumes, with preference for directly addressing insufficient emissions reductions through, for example, reduced free allocation and better management of the stockpile.
- Some submitters commented on the potential inclusion of international carbon credits, with mixed views on whether this would be positive or negative.
- A small number of submitters responded to this question by reiterating their support for the 'status quo' and disagreeing with the premise behind the methodology (ie, not agreeing with the sub-step proposed in question 10).

Update price control settings

Question 13: To what extent do you believe that increasing the CCR trigger price would influence NZU prices? Do you think that this influence would remain if CCR trigger prices were increased more significantly?

This question did not provide discrete options for selection.

Substantive responses from submitters, as part of the survey or in separately uploaded documents, provided the following perspectives:

- Submitters varied in their perspectives on the extent to which the CCR trigger price would influence NZU prices. Many nevertheless supported an approach that results in higher NZU prices. Their differences largely stemmed from multiple interpretations of ‘influence’:
 - That a high CCR trigger price would have no or negligible influence because it would become less of a consideration in the secondary market and allow for price discovery;
 - Or the act of increasing the CCR trigger price constitutes a ‘significant influence’.
- Some submitters stated they did not believe the CCR trigger price was a significant influence on NZU prices regardless of its level, instead seeing factors such as total auction volumes as having a stronger impact.
- Varied perspectives were expressed on whether the ‘magnet effect’ of the trigger price was real and whether an increased trigger price would have a greater or lesser magnet effect.
- Several submitters noted the trigger price is or should be only one factor in the determination of NZU prices and must not be assessed and set in isolation.

Question 14: What do you think of the approach of setting price controls with reference to prices required to deliver gross emissions reductions?

This question did not provide discrete options for selection.

Substantive responses from submitters, as part of the survey or in separately uploaded documents, provided the following perspectives:

- Submitters to the consultation varied on whether they agreed with the proposed approach to setting price controls, with reference to prices required to deliver gross reductions.
- Of those submitters whose main focus was driving behaviour change and meeting targets, most agreed a focus on gross reductions is necessary, potentially through reflecting this in setting price controls or otherwise avoiding over-reliance on afforestation.
- Conversely, other submitters saw this approach as a departure from the Commission’s role in advising how to meet the net-zero target, and that the division of gross versus net reductions should fall to the market not the Government. These submitters were split between prioritising net reductions and balancing gross and net reductions.
- Some submitters agreed gross reductions were important but that setting price controls with reference to gross reductions would instead unintentionally drive afforestation, where difficult-to-abate emissions existed.

Question 15: What do you think of the proposed auction price floor settings? What impacts do you think will result from different settings?

This question did not provide discrete options for selection.

Substantive responses from submitters, as part of the survey or in separately uploaded documents, provided the following perspectives:

- Submitters generally supported option 4, following the Commission's recommendations if all years are updated.
- A small number of submitters supported options 1, 2 or 3 where they were concerned about creating an expectation of rapidly rising prices.
- In either case, submitters agreed that increasing the price floor would result in increased prices, with most disagreement centring on whether this was desirable to achieve gross and/or net reductions or would have negative market, economic or other impacts.
- Feedback from submitters showed little support for the mid-range options, with most feedback supporting either the status quo or the Commission's recommendations.

Question 16: Do you think the cost containment reserve should be disabled by having no reserve volume?

Of those submitters who selected an option in response to this question, most disagreed with disabling the CCR by having no reserve volume. Several submitters agreed or were unsure.

Substantive responses from submitters, as part of the survey or in separately uploaded documents, provided the following perspectives:

- Submitter views were mostly aligned in support of the CCR remaining in place.
- Submitters generally expressed that, at present, the CCR plays an important role in mitigating extreme market conditions, however, there were differences in opinion regarding the appropriate trigger price level.
- Some submitters expressed support for the CCR being disabled in future but were comfortable deferring to the Commission's advice for now.
- A smaller portion of submitters argued for the removal of the CCR stating that supply and demand should set the price and the CCR is a risk to achieving Aotearoa New Zealand's required emissions reductions.
- Feedback from submitters showed little support for the mid-range options, with most feedback supporting either the status quo or the Commission's recommendations.

Question 17: If retained, do you think the cost containment reserve should consist of one or two tiers?

Of those submitters who selected an option in response to this question, most preferred a two-tier approach to the CCR, with a minority supporting a one-tier approach. These were the only two selectable options.

Question 18: If a technical adjustment is included as part of the stockpile reduction component of auction volumes, should this technical adjustment amount be included in the total cost containment reserve volume?

Of those submitters who selected an option in response to this question, feedback was a split between supporting and not supporting, including a technical adjustment in the CCR volume. Most respondents, however, were unsure.

Question 19: If a multi-tier cost containment reserve is progressed, how should the volume of units in these tiers be decided on?

This question did not provide discrete options for selection.

Detailed feedback on questions 17–19

Substantive responses from submitters as part of the survey or in separately uploaded documents, which tended to cover issues across these questions, provided the following perspectives:

- Consistent with other areas of feedback, most submitters voiced support for following the Commission’s recommendations.
- Several submitters cited the increased complexity that a two-tier CCR would introduce to the NZ ETS, on top of existing complexity for participants. Submitters with this view appeared to vary across whether they supported simplicity as a way of making the pathway for necessary emissions reductions clearer, and avoiding further regulatory uncertainty, or supported a single-tier approach as part of a general preference for maintaining the status quo.
- One submitter stated that the Climate Change Response Act 2002 ought to specify a clearer purpose for the CCR, if settings are to be established that are intended to stop prices from rising too high.
- In line with the Commission’s advice, most submitters supported not making technical adjustments as part of stockpile reduction.
- Some submitters, however, preferred that, if technical adjustment were to take place, this ought to be done through the CCR rather than via another measure.
- Feedback varied on how the tiers should be determined, and most responses to this topic simply reiterated their previously stated support for the Commission’s advice or lack thereof.

Question 20: What do you think of the proposed cost containment reserve trigger price settings? What impacts do you think will result from different settings?

This question did not provide discrete options for selection.

Substantive responses from submitters, as part of the survey or in separately uploaded documents, provided the following perspectives:

- Most submitters supported options 4 or 5, either supporting the Commission’s recommended low tier trigger or high tier trigger, but in both cases supporting an increase in the CCR trigger price. These submitters tended to highlight either the positive impact of a general increase in prices for achieving gross and/or net emissions reductions, or because of the effects on the market: for example, “the Commission’s recommended low and high triggers [...] are the only options that offer sufficiently high trigger prices to limit the risks and impacts of the price controlling mechanism”. These submitters generally saw options 1, 2, and 3 as more likely to result in the possible ‘magnet’ effect.
- Submitters who did not support the Commission’s recommendations, or otherwise stated support for options 1, 2 or 3, generally supported the status quo settings. They were concerned that the Commission’s option could create rapidly rising prices, noting this could have unacceptable market, economic or other impacts.

Impacts

Question 21: Are there further impacts at these prices that should be considered?

Of those submitters who selected an option in response to this question, most agreed that further impacts existed that should be considered at the prices presented. Several submitters disagreed or were unsure.

Question 22: What role should price controls play in containing the level of impacts, and what price control settings would be required for this?

This question did not provide discrete options for selection.

Question 23: If prices reached those presented in the cost containment reserve trigger price options above, do you feel that you have options to change behaviours or make new investments to address the impacts?

Of those submitters who selected an option in response to this question, most believed they have options to change behaviours or make investments under the CCR trigger price options presented. Several submitters were unsure, and one disagreed.

Question 24: Could you change behaviours or make new investments to mitigate the impact of higher prices on yourself?

Of those submitters who selected an option in response to this question, all respondents agreed they could change behaviours or make new investments to mitigate the impact of higher prices on themselves.

Detailed feedback on questions 21–24

Substantive responses from submitters as part of the survey or in separately uploaded documents, which tended to cover issues across these questions, provided the following perspectives:

- Submitters generally reiterated the types of impacts discussed in the consultation document, with frequent reference to effects on businesses and the broader economy, increased government revenue, drivers for decarbonisation, and the roles of complementary and equity policies.
- Almost all submitters, regardless of their perspective on what impacts are most important, believed complementary policies or other measures are the best ways to manage other impacts; or that, at most, settings could consider not unduly exacerbating impacts but with non-market measures still being the main channel for addressing these impacts.
- One submitter noted that, to be effective and equitable, complementary policies need to be in place before significant changes in or removal of price controls.
- Most individual submitters, in particular those submitters who prioritised behaviour change and emissions reductions, believed actions can always be taken to address impacts.
- Many business or industry submitters expressed concern that mitigations and/or investments, and the resources to act on them, are not sufficiently available or cost-effective.

Feedback and comments

General feedback

Additional feedback from submitters mainly fell under the following topics, some of which are considered out-of-scope for this consultation:

- Many submitters reiterated support for the Commission's recommendations and reduced political decision-making in the adjustment of settings.
- Some expressed interest in alignment with international carbon markets and more opportunities for offshore mitigation.
- Several submitters commented on the role of forestry (both positive and negative) in the NZ ETS, most of which fell more within the scope of the consultations on the NZ ETS review or the redesign of permanent forestry.
- Several submitters stated the urgency of climate action both in terms of reducing emissions and supporting communities already experiencing the worst effects of climate change.

Additional information

Further information and documents about the annual update for NZ ETS limits and price control settings for units 2023 are available on the Ministry's website: [Annual updates to New Zealand Emissions Trading Scheme limits and price control settings for units 2023: Consultation document](#).

Appendix:

Tables showing percentage of total submissions in support of options presented

Note: These results only reflect where submitters have self-selected preferences from a list of options. This means submissions provided within a separately uploaded document are captured as 'not answered' even if the text of their submissions suggests a preference. Uploaded submissions are also not counted toward 'explanation provided' unless they added text directly into the survey fields. Uploaded submissions often include greater detail and are often received from major stakeholders or larger organisations.

1: Do you think the decisions on NZ ETS unit settings announced in December 2022 had any impact on NZ ETS market behaviour?

Option	Total	Percent (%)
Yes	33	54.10
No	0	0.00
Unsure	1	1.64
Not answered	27	44.26
Explanation provided	34	

2: Do you think that the proposed update to auction volumes to reflect a change in forestry emissions outside the NZ ETS is sufficient to allow unit settings for 2024 and 2025 to be updated?

Option	Total	Percent (%)
Yes	21	34.43
No	3	4.92
Unsure	8	13.11
Not answered	29	47.54
Explanation provided	22	

3: What other special circumstances, if any, do you think exist that might enable updating NZ ETS unit settings for 2024 and 2025?

No selectable options	Total	Percent
Explanation provided	30	

4: If there are special circumstances, do you think updates to NZ ETS unit settings for 2024 and 2025 are justified and should be made?

Option	Total	Percent (%)
Yes	26	42.62
No	1	1.64
Unsure	1	1.64
Not answered	33	54.10
Explanation provided	22	

5: Do you think that updates to NZ ETS unit settings for 2024 and 2025 should occur if NZUs from the cost containment reserve are sold at the June NZ ETS auction?

Option	Total	Percent (%)
Yes	24	39.34
No	1	1.64
Unsure	4	6.56
Not answered	32	52.46
Explanation provided	23	

6: Do you think the Commission's updated estimates of forestry emissions outside the NZ ETS are accurate?

Option	Total	Percent (%)
Yes	20	32.79
No	1	1.64
Unsure	9	14.75
Not answered	31	50.82
Explanation provided	17	

7: Do you think that an update to calculations, and a corresponding reduction in auction volumes, should be made to reflect this updated estimate?

Option	Total	Percent (%)
Yes	23	37.70
No	0	0.00
Unsure	8	13.11
Not answered	30	49.18
Explanation provided	19	

8: Do you think that reductions in auction volumes and limits should occur to reflect the identified discrepancies between emissions reported in the Greenhouse Gas Inventory and the NZ ETS?

Option	Total	Percent (%)
Yes	22	36.07
No	1	1.64
Unsure	7	11.48
Not answered	31	50.82
Explanation provided	18	

9: Do you think the status quo approach to stockpile reduction should be retained?

Option	Total	Percent (%)
Yes	10	16.39
No	11	18.03
Unsure	8	13.11
Not answered	32	52.46
Explanation provided	17	

10: Should a new sub-step be added this year to address projected impacts on surplus stockpile liquidity rather than addressing it through annual updates to estimates of surplus stockpile liquidity?

Option	Total	Percent (%)
Yes	18	29.51
No	3	4.92
Unsure	9	14.75
Not answered	31	50.82
Explanation provided	16	

11: Should adjustments to auction volumes be made to address historic actions?

Option	Total	Percent (%)
Yes	21	34.43
No	3	4.92
Unsure	6	9.84
Not answered	31	50.82
Explanation provided	19	

12: What do you think of the methodology used to calculate auction volumes, including on each specific step?

No selectable options	Total	Percent
Explanation provided	20	

13: To what extent do you believe that increasing the CCR trigger price would influence NZU prices?

No selectable options	Total	Percent
Explanation provided	32	

14: What do you think of the approach of setting price controls with reference to prices required to deliver gross emissions reductions?

No selectable options	Total	Percent
Explanation provided	27	

15: What do you think of the proposed auction price floor settings?

No selectable options	Total	Percent
Explanation provided	29	

16: Do you think the cost containment reserve should be disabled by having no reserve volume?

Option	Total	Percent (%)
Yes	6	9.84
No	18	29.51
Unsure	4	6.56
Not answered	33	54.10
Explanation provided	27	

17: If retained, do you think the cost containment reserve should consist of one or two tiers?

Option	Total	Percent (%)
One tier	4	6.56
Two tiers	24	39.34
Not answered	33	54.10
Explanation provided	27	

18: If a technical adjustment is included as part of the stockpile reduction component of auction volumes, should this technical adjustment amount be included in the total cost containment reserve volume?

Option	Total	Percent (%)
Yes	8	13.11
No	6	9.84
Unsure	14	22.95
Not answered	33	54.10
Explanation provided	15	

19: If a multi-tier cost containment reserve is progressed, how should the volume of units in these tiers be decided on?

No selectable options	Total	Percent
Explanation provided	28	

20: What do you think of the proposed cost containment reserve trigger price settings?

No selectable options	Total	Percent
Explanation provided	30	

21: Are there further impacts at these prices that should be considered?

Option	Total	Percent (%)
Yes	13	21.31
No	6	9.84
Unsure	8	13.11
Not answered	34	55.74
Explanation provided	18	

22: What role should price controls play in containing the level of impacts, and what price control settings would be required for this?

No selectable options	Total	Percent
Explanation provided	28	

23: If prices reached those presented in the cost containment reserve trigger price options above, do you feel that you have options to change behaviours or make new investments to address the impacts?

Option	Total	Percent (%)
Yes	25	40.98
No	1	1.64
Unsure	3	4.92
Not answered	32	52.46
Explanation provided	20	

24: Could you change behaviours or make new investments to mitigate the impact of higher prices on yourself?

Option	Total	Percent (%)
Yes	29	47.54
No	0	0.00
Unsure	0	0.00
Not answered	32	52.46
Explanation provided	19	

Any general feedback on the consultation?

No selectable options	Total	Percent
Explanation provided	26	