

Greater Wellington Regional Council submission on: Resource Management (Climate Protection) Amendment Bill

Introduction

Greater Wellington is pleased to have the opportunity to make a submission on the Resource Management (Climate Protection) Amendment Bill (the Bill). Climate change is a pressing issue with far-reaching consequences for New Zealand's economy and society.

The causes and effects of climate change are both significant issues for Greater Wellington. Recent amendments to the Resource Management Act 1991 have provided a mandate to actively address causes, albeit indirectly, through amendments that promote improved end-use energy efficiency and consideration of the benefits of renewable energy and effects, by way of specific reference to climate change effects in section 7.

These amendments are being pursued through specific practical actions by Greater Wellington, such as investigation of the feasibility of wind farm development on land owned by the Council, and potentially by policy provisions in the Regional Policy Statement for the Wellington Region, which is currently being reviewed. As part of the review process, climate change has been identified as a significant issue, and appropriate provisions will be developed for inclusion in the new Regional Policy Statement.

The Bill is a further recognition by government of the need to manage greenhouse gas emissions but, as a one-off isolated action, it does not tackle the issue in a meaningful way. Greater Wellington is therefore not able to support the Bill in the absence of clear national policy direction that will be effective in changing behaviour.

Specific comment

The Resource Management (Climate Protection) Amendment Bill essentially re-creates the legislative situation prior to 2004 when the Resource Management (Energy and Climate Change) Amendment Act came into effect. Given the rapidly increasing knowledge about and urgency to address climate change causes and effects, the Bill seems to be a small and isolated response.

Further, the Bill is placing a responsibility back on regional councils to deliver a national policy without clear and complementary action on the part of central government. While there is an indication that there might be some form of national instrument, and hence that the Bill is by implication addressing an interim situation, the benefits of taking a backward step to an earlier legislative context are questionable.

The Explanatory Note to the Bill has some positive words about the role that local government can have on transport and land use planning and, through transport policy, on greenhouse gas emissions from motor vehicles. The reality is that regional councils are not able to significantly influence greenhouse gas emissions by these means, at least not in the short term. A direct initiative would be to tackle emissions from individual vehicles, but councils do not have the resources, technology or ability to take this action. Vehicle emissions are best addressed in the short term by way of centrally directed controls such as the warrant of fitness testing programmes and associated standards.

The Bill does not affect Greater Wellington's ability to address climate change as a significant resource management issue for the region. In terms of the Bill's "benefit" of enabling consideration and management of climate change-inducing emissions through regional plans, Greater Wellington is unlikely to be formally reviewing and possibly amending its Regional Air Quality Management Plan for at least another three years. As noted above, the urgency and scale of climate change should precipitate national action well in advance of 2009, given New Zealand's commitments under the Kyoto Protocol to achieve certain targets before 2008.

Another purpose in introducing the Bill is to allow consideration of climate change in the granting of air discharge permits. However, in the absence of specific guidance as to how this might operate (what gases need to be considered, at what emission rates or quantities etc), the Bill is likely to create uncertainty as to how it should be implemented.

Concluding comment

While acknowledging the good intent behind the Bill, Greater Wellington believes that it is an ad hoc and insufficient proposal to deal with an increasingly urgent and fundamentally significant issue. A much more comprehensive consideration of climate change and associated sets of policy responses and technical guidance are needed rather than the reintroduction of a questionably effective status quo that had existed until two years ago.

Greater Wellington wishes to be heard in support of its submission.

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Chairperson