Submission on:	**CCC Emissions Target Consultation**
From:	**Rod Donald Banks Peninsula Trust**

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The Rod Donald Banks Peninsula Trust is a registered charity and a CCO of the Christchurch City Council.

The Trust has objectives to promote sustainable management and conservation on Banks Peninsula and works on environmental projects that support the reinstatement of native vegetation and enhancement of native biodiversity, generally in conjunction with improved public access on foot and by bike.

The Trust would like to be speak to the Innovation and Sustainable Development Committee in support of its submission.

Submission

The Trust supports:

- The Christchurch City Council declaration of the Climate and Ecological Emergency
- The proposal to set more ambitious emission reduction targets for the Christchurch City Council area than the national targets
- Augmenting reductions through additional carbon sequestration

Our key submission points are to establish clear and ambitious interim targets and then develop implementation plans that financially encourage and support action through information and practical regulation. We suggest that this is achieved through:

1. **Sequestration on a landscape scale through fostering large tracts of naturally regenerating native forest on Banks Peninsula.**
2. **Reduced energy and low carbon transport.**
3. **Encouraging everyday actions that individuals can take to lower their personal carbon footprint and use demand to lower overall emissions.**

Climate and Ecological Emergency

The Trust recognises how serious the problem of human induced climate change is and strongly supports the decision of Christchurch City Council to declare a Climate and Ecological Emergency.

It is now imperative that rapid and effective action is taken to both reduce the emissions from our area and to improve the state of the natural environment to help mitigate and adapt to the emergency. The Trust supports the Government's overall target of net zero by 2050. We recognise that it will not be easy and that all areas of the country and all sectors of the economy need to urgently act to reduce overall emissions.

The Trust submits that climate change mitigation and adaptation implications be considered by the Council in all facets of its own work and steps be taken to halt and reverse ecological decline.

Achieving Reduction targets

The CCC Emissions Target Consultation document provides a useful high-level summary of the current state of Christchurch emissions and the existing amount of sequestration provided via forestry. To assist further work and public understanding, we suggest that the Council publishes supporting information on how the current state of emissions has been assessed and what has been included in the figures.

The Trust supports the interim target for Christchurch to reduce emissions by 50% by 2030. If that can be achieved, the area will be well on its way to reaching the 2050 target.

We believe the upcoming Climate Change Strategy can achieve this overall target through developing and implementing detailed annual action plans with interim targets. We would expect the Council to report annually against these plans and targets enabling the progress toward the goal to be tracked and adjustments made along the way, thus ensuring that our city achieves the 50% reduction by 2030. We recommend that a major review then takes place in the lead up 2030, enabling planning for the remaining 20 years, which will almost inevitably include the harder areas for reduction.

We acknowledge that methane is a difficult area, but suggest that progress needs to be made and dealing with the issue be neither postponed nor ignored. Reducing methane from landfills is clearly within the remit of the Council, and it would be useful to have a breakdown of the percentage of Christchurch methane emissions from agriculture and from landfills and other sources to quantify the level of the problem. We support a 10% methane reduction by 2030, but a more ambitious target for 2050 of at least 50% from agriculture and 90% from other activities – both the Council emissions and other private sources.

Changing individual consumption patterns

We recommend that consumption is added to the list of areas that "need to be re-imagined". We would like to see the Council taking an educational role and, where possible, a regulatory role in promoting changes in consumption patterns.

For example, a low meat and dairy diet is increasingly being suggested as a way for individuals to lower their footprint. If the city population as a whole were to eat a lower footprint diet, that will have flow on effects to agriculture and to methane emissions. Although agriculture is a relatively small part of the direct economy within the City Council's territorial boundary, the city and its people are influencers over what happens in the wider region, and taken as a whole the methane and other agricultural emissions from Canterbury are high. They cannot be ignored, and changing the diet of the human population will in turn lead to necessary agricultural changes.

Travel, the rebuild, food miles and the waste stream are other areas of consumption to add to the list. We would like the Council to foster a city where:

- people use climate friendly methods to travel such as public transport, walking and cycling.
- domestic tourism is encouraged over international travel to reduce air miles, with people recreating in their own backyard – such as beautiful Banks Peninsula
- international tourists are encouraged to make their NZ experience low in carbon emissions by minimising their footprint while here, staying for longer and offsetting their international flights through supporting genuine local sequestration projects
- building materials used are sustainable and low footprint – such as more wood products and much less use of cement/concrete, repurposing the older housing stock rather than enabling urban sprawl and ensuring new houses include sustainability features such as solar panels and space for food gardens
- more food consumed is locally grown, it has a lower carbon footprint and less is wasted
- much less single use packaging is the norm and better separation and recycling of residual waste streams takes place.

The flow through effect of consumer change on production choices should therefore be included as a key method for the Council to effect change. The recent switch from single use plastic bags provides an exemplar for such social change.

Sequester carbon through naturally regenerating native forest on Banks Peninsula

The Consultation document notes that forestry in Christchurch currently only offsets a fraction of the city's emissions. The 100,000ha rural area of Banks Peninsula, much of it hill country that is marginal for farming, affords Christchurch the opportunity to offset emissions and at the same time reverse the Ecological Emergency.

Prior to its settlement by Europeans, Banks Peninsula was predominantly covered in native forest. As a result of timber milling followed by fires to clear land for pasture, this was reduced to 1.2% coverage in fragmented remnants by the 1920s. Since that low point there has been a significant regeneration of native vegetation, seeded from remnant sources and able to take hold in lightly grazed pasture or under nursery crops of gorse and broom. Native forest grows rapidly on Banks Peninsula and natural regeneration is a proven method to establish forest on a landscape scale. It is a much more effective, reliable and ecologically sound way to establish native forest than via planting.

Much of the land on Banks Peninsula is marginal farmland – steep, hard to access and erosion prone. It is therefore not ideal for planting in exotic rotational forestry and the Peninsula has already seen its share of post-harvest erosion problems. Establishing permanent native forest provides a way to sequester carbon, reverse the ecological decline, and protect soil and waterways from erosion.

Planting in natives for permanent forest, while beneficial, would be an unrealistic objective at any landscape scale. Native trees are much more expensive to plant and establish than pines, and there is not the infrastructure to produce large quantities of bare root stock. Natives require protection from hare and deer browse, and labour intensive releasing from weeds for two to three years after planting.

By contrast, the ease with which natural regeneration can be achieved on a landscape scale creates a more realistic opportunity for Banks Peninsula to act as a large carbon sink. This carbon sink could significantly assist the achievement of the net emission targets the City is seeking. The 1,250 hectare Hinewai Reserve in the south-eastern corner of the Peninsula serves as a model demonstrating how rapidly native forest can establish naturally on marginal land provided that grazing stock are excluded, feral herbivores eradicated and some pest and weed control enacted.

Natural regeneration is already happening all over Banks Peninsula, generally due to "benign neglect" engendered by economic conditions rather than the active land management seen at Hinewai. However, this regeneration is not necessarily valued or protected and has come under threat in the past few years as a new farming trend has seen swathes of young regenerating forest aerial sprayed to return the land to improved pasture. This has a doubly negative impact on efforts to reduce emissions as regenerating forest that is about to enter its years of maximum growth and therefore peak carbon sequestration is not only removed, but replaced with methane emitting grazing stock.

The key to establishment of native forest through natural regeneration on a landscape scale lies in finding ways to incentivise land owners to value and actively manage marginal land for regeneration.

The Trust has convened a multi-agency group working with MPI to improve the opportunities for naturally regenerating land to enter the Emissions Trading Scheme (ETS) and earn carbon credits as permanent native forest. However, the current difficulties of entering the scheme combined with a relatively low carbon price mean that the ETS alone does not provide a compelling financial incentive for landowners to change land use from beef and sheep grazing to native forest regeneration.

The Trust therefore submits that **for Christchurch to take advantage of the huge sequestration potential of Banks Peninsula, its Climate Change Strategy will need to find ways to augment the ETS and tip the balance for owners of marginal land on Banks Peninsula into native forest regeneration.**

We suggest that:

- enforcement of existing regulations is important to stem the current trend of spraying off regenerating areas that are already protected
- the Council engages in the land purchase of marginal land to set up model carbon parks
- the Council develops methods to incentivise landowners to change their land management use to foster native regeneration (possibly starting with rates remissions for regenerating land).

Rod Donald Trust as a CCO is positioned to assist with Climate Strategy development and delivery

The Trust has a good understanding of Banks Peninsula, strong local networks, a well established reputation, and the ability to move rapidly when opportunities present. It has nearly 10 years of experience in developing and promoting low carbon sustainable recreation opportunities, supporting land purchase for native forest protection, and working in partnership with a wide range of agencies and private land owners to achieve results in cost effective ways.

As a CCO, the Trust is therefore uniquely placed to assist the Council to develop and deliver its Climate Change Strategy and reduce net emissions through harnessing opportunities on Banks Peninsula including:

- establishing large tracts of ecologically diverse permanent native forest carbon sinks
- low-carbon recreational activities reducing the footprint of both domestic holidays and international visitors
- combining these with a learning environment to further develop environmental and climate awareness, encourage individual behaviour change and grow guardians for the future.

Further Information

For more information about Rod Donald Banks Peninsula Trust:

- www.roddonaldtrust.co.nz
- or watch https://www.youtube.com/watch?v=pAMeS1nQK8Y

For more information about the transformation of marginal land to permanent native forest at Hinewai Reserve please watch the recently released film 'Fools and Dreamers':

- (https://happenfilms.com/fools-and-dreamers)

For a review of the latest IPCC report "Climate Change and Land" advising the halting of forest destruction and enabling restoration of forests:

- https://www.theguardian.com/environment/2019/aug/08/how-climates-impact-on-land-threatens-civilisation-and-how-to-fix-it
- https://www.ipcc.ch/report/srccl/