

TE WAIORA



Nelson Marlborough
Health

Ministry for the Environment's Emissions Reduction Plan

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu o Te Waka a Maui. NMH appreciates the opportunity to comment from a public health perspective on the Ministry for the Environment's Emissions Reduction Plan.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.

General Comments

3. NMH supports the introduction of a Plan that significantly lowers New Zealand's emissions in order to reach net-zero long lived gases by 2050 and reduce the impact of climate change on New Zealand. Climate change has the potential to adversely affect the health of New Zealand's people, environment and economy. By planning across all sectors now, the government and government agencies have the opportunity to make effective changes that can reduce emissions so we can meet our international obligations. If New Zealand waits, then there is potential that sudden changes need to be made, placing further burden on future generations and impacting on people's health and wellbeing.
4. NMH supports the vision in the Strategy in terms of creating a productive, sustainable and inclusive economy where
 - a. economic activity is nature enhancing, carbon neutral and climate resilient,
 - b. that energy and transport systems are accessible, affordable and sustainable
 - c. that Te Tiriti partners work together
 - d. every New Zealander has a safe, warm, dry and affordable home.

NMH also supports the vision that every household can meet its material needs, in turn reducing child poverty. NMH notes that this is the only time that child poverty is mentioned in the document, and there is no further discussion linking emissions reduction and child poverty, nor does there seem to have a specific set of actions mentioned to support this vision.

5. The health sector is one of the largest greenhouse gas emitters in the public sector. This will need the incorporation of a sustainability unit in the new Health NZ and Māori Health Authority structures, along the lines of the Greener NHS system in NHS England

Transition Pathway

6. *Q1 Five principles:*

Yes, NMH supports the Guiding Principles in the Plan: A fair, equitable and inclusive transition, evidence based approach, environmental and social benefits, upholding Te Tiriti, and an ambition and affordable path.

7. *Q2 How can we enable further private sector action to reduce emissions and help achieve a productive, sustainable and inclusive economy?*

The barriers (e.g. financial, managerial and legal) among stakeholders in the private sector should be identified. Efforts to adopt some of the emissions reduction practices can put financial strain on their businesses. Benefits such as government subsidy sustainability certifications, and sustainable practice training would encourage participation from the private sector. It is important to categorise different businesses in the private sector and translate policies into practice exclusively for each business category.

8. *Q3 What further measures could be used to help close the gap*

The core principles of Sustainable Development, which New Zealand is moving towards, include three dimensions: Economic, Social and Environmental. In Table 5 (Guiding principles for Government decisions on the emissions reduction plan), the benefits of all dimensions should be demonstrated not only in a broader view but also specifically to all sectors. Climate-related outcomes should be measured not only in the quantity of carbon reduction or sequestration, as it is difficult for the general public to relate to (e.g. with regard to their health and wellbeing), but also contextualised by other outcomes such as health status and quality of life.

9. *Q7 Which actions to reduce emissions could increase future risks and impacts of climate change, and therefore need to be avoided?*

The Climate Commission's initial draft advice noted that '*Aotearoa should focus on decarbonising its industries rather than reducing production in a way that could increase emissions offshore*'. However this Emissions Reduction Plan is reliant on the nationally determined contribution that is expected to come from "offshore

mitigation". If we're actually increasing global emissions by producing fuel offshore then overall emissions are not being reduced. The Strategy needs to contain Actions that reduce emissions onshore and offshore.

Working with our Tiriti Partners

10. Q9 What actions should a Māori-led transition strategy prioritise

NMH supports the approach to embed the principles of the Treaty of Waitangi into the Strategy. It is important that Maori aspirations and values are included to ensure that the indigenous relationship to the environment is acknowledged and also so that collectively different community groups can work together on climate change solutions. In addition, it is important to acknowledge that climate change may mean further displacement and dispossession from land and heritage as sea level rise.^{1,2}

Making an equitable transition

11. Q13 Do you agree with the objectives for an Equitable Transitions Strategy as set out by the Climate Change Commission?

Yes, the health and socioeconomic impacts of climate change disproportionately harm populations who have contributed the least to the problem. Moreover, climate change interacts with existing determinants of health exacerbating long standing health inequities within and between countries.

12. Q16 How can Government further support households (particularly low-income households) to reduce their emissions footprint?

In New Zealand, a key difficulty for emissions reduction for low-income households are old cars and poor house insulation and heating. The new EV car subsidy scheme is not accessible to many, and the price of used EVs can be considered unaffordable to a lot of people. Other alternatives may need to be prioritised, i.e. introducing 'clean' public transport, reducing bus fares, and expanding and connecting bike lanes. In terms of housing, NMH supports the Warmer Kiwi Homes Programme that provides grants for heating and insulation for homeowners. However, it is worth looking at the proportion of low-income households that have

¹ Marmot, M., Friel, S., Bell, R., Houweling, T. A. J. & Taylor, S. Closing the gap in a generation: health equity through action on the social determinants of health. *The Lancet* vol. 372 1661–1669 (2008).

² Bennett, H. et al. Health and equity impacts of climate change in Aotearoa-New Zealand, and health gains from climate action. *N. Z. Med. J.* 127, 16–31 (2014).

not yet benefitted from this scheme, including those living in rental properties who may be left behind. In addition alternative modes need further investment. NMH has discussed this within the transport section. We advocate for investment in active transport infrastructure and free bus travel for those under 25, students and community card holders.

In addition, housing intensification should occur around city centre and suburban hubs and major public transport routes. New greenfield housing developments must include public and active transport infrastructure.

NMH notes that there is mention of the Warmer Kiwi Homes within the Strategy, this programme is providing support for a number of New Zealanders, the Warmer Kiwi Homes criteria has narrowed from when it was first introduced meaning there are less people who can access the programme, however house prices have considerably increased along with inflation, therefore less people are in a position to access funds to improve home insulation. NMH recommends that further funding is made available to improve the overall housing stock.

Consideration could also be given to providing more financial assistance for homeowners to access solar energy, in addition all suitable public housing rooves should be equipped with solar panels and batteries, this enables people to save money on their power bills and possibly enable them to share clean energy with their neighbours.

Planning

13.Q33 In addition to resource management reform, what changes should we prioritise to ensure our planning system enables emissions reductions across sectors?

Consideration of the reduction of urban sprawl needs to be considered in order for a reduction of transport emissions. In recent decades New Zealand cities have been growing outwards, with highly productive land being converted into housing and for commercial purposes. NMH supports the recent changes in the Government Position Statement on Housing and Urban Development that enable for intensification. NMH would highlight the importance of ensuring that the National Policy Statement on Urban Development strengthens its protection of highly productive soil to align with the National Policy Statement on Highly Productive Soils.

14. Climate change could change what we consider to be highly productive land. Changes in weather patterns across regions and extreme weather events will affect

New Zealand soils. It is important that the highly productive land that is suitable for food is protected around urban centres so that there is a source of locally produced food, this also reduces overall food miles and therefore emissions.

15. Q34 What more do we need to do to promote urban intensification, support low-emissions land uses and concentrate intensification around public transport and walkable neighbourhoods?

New Zealand communities need to have conversations about sea level rise in relation to town centres and create management plans for the future in order for local government, home and business owners to plan future infrastructure. For example if neighbourhoods are prone to flooding or coastal inundation, then intensification in particular areas may not be desirable. Expectations for land use and associated infrastructure level of service need to be established in order to support urban intensification.

Moving Aotearoa to a circular economy

16. Q45 what do you think our circular economy could look like in 2030, 2040, and 2050, and what do we need to do to get there?

A sector-by-sector approach is recommended to fully understand the level of waste including imported plastic and its use in New Zealand. For example, the healthcare sector relies heavily on imported equipment, clinical supplies, and pharmaceuticals. As this is already a competitive market, limiting access to products due to their plastic content and packaging could have serious implications on the ability to provide certain health services. It is important that sectors such as ours are supported as we transition away from hard to recycle materials.

17. Q46 How would you define the bio-economy and what should be in scope of a bio-economy agenda? What opportunities do you see in the bio-economy for Aotearoa?

NMH recommends that the plant-based protein sector is further developed as this sector has “lower emissions, water and land use footprint than conventional animal agriculture products”³. In addition, there is a reduced risk of bacterial contamination from animal land use. The EAT-Lancet Commission summary states that “a large body of work has emerged on the environmental impacts of various diets, with most studies concluding that a diet rich in plant-based foods and with fewer animal source foods confers both improved health and environmental benefits”. Plant-based diets are also associated with lower BMI, cholesterol, and blood pressure, therefore lowering risk of non-communicable diseases. NMH

³ Climate Commission Advice

supports the intended actions proposed in the Strategy that promotes low emission plant-based protein sector.

Funding could be given to future proofing and diversifying our food production system so that it is not as susceptible to extreme weather events. WHO has stated that climate change is expected to lead to modified bacterial, viral and pathogenic contamination of water and food by altering the features of survival and transmission patterns through changing weather characteristics, such as temperature and humidity.⁴

Transport

18. Q52 Do you support the target to reduce VKT by cars and light vehicles by 20 per cent by 2035 through providing better travel options, particularly in our largest cities, and associated actions?

Yes. Significantly increasing active and public transport modes has a multitude of environmental and public health benefits such as more equitable access to transport, further reduced air pollution from reduced tyre wear and brake use, increase in physical activity and improved liveability.

19. NMH recommends the target be brought forward to 2030. However, in order to achieve the best health outcomes this needs to be coupled with a defined increase in active transport. NMH recommends a minimum of an absolute increase of 10% in each active mode or a doubling of active transport (cycling and walking) mode share- whichever is larger- in all urban areas with a population over 10,000 by 2030. Investment and development of completely interconnected cycling and walking infrastructure must be available to meet this minimum goal, along with extensive links between active and public transport routes.

20. NMH recommends that there is free public transport for everyone under 25, students and community services card holders.

21. In addition, Councils should be required to (rather than "encourage") implement first and last kilometre travel solutions so that people have a range of transport options.

NMH recommends that the speed limit is reduced in all urban areas from 50km/h to 40km/h. Speed affects the likelihood and impact of all crashes. Small reductions

⁴ World Health Organization (2018) Food Safety Climate Change and the Role of WHO
https://www.who.int/foodsafety/_Climate_Change.pdf

in impact speeds greatly increase the chances of surviving a crash, particularly for pedestrians and cyclists. The Ministry of Transport's Safer Journey report⁵ shows that there is a 10% probability of death for pedestrians struck by cars travelling at 30km compared with 50% probability for pedestrians struck by cars travelling at 45km. Speed limits should be reduced in order to create safer walking/cycling environments. It is only by having safe active transport that we will encourage its use and create modal shift.

22. Q53 Do you support the target to make 30 per cent of the light vehicle fleet zero-emissions vehicles by 2035, and the associated actions

No, as this target is not ambitious enough. Until recently, New Zealand was one of only three developed countries that does not have regulations on vehicle emissions quality, and as a result, has one of the most fuel inefficient and polluting fleets of any OECD country. This has serious implications on the health and wellbeing of New Zealanders, including high rates of asthma, respiratory illnesses, and lung cancer. Children, the elderly, and low income families are particularly vulnerable to poor air quality. It will take time to update the entire vehicle fleet to a no/low emitting fleet therefore private vehicle use should be curtailed through measures such as prioritising active transport, cycle and pedestrian only zones, increased parking charges, zero emissions zones, widespread adoption of traffic calming measures and reduced speed limits.

All light vehicles entering the country should be zero emissions by 2030 (only battery electric vehicles). NMH supports the introduction of subsidies for EVs. Price is a barrier for people wishing to purchase EVs.

There needs to be a comprehensive plan to map and scale up EV charging infrastructure throughout the country in order to meet the increasing demand for EVs. The plan should also include measures to promote electrification of public and active transport (e.g. electric rail and buses, e-bikes, e-scooters). In addition, the environmental effects of electrification should be continually reviewed to ensure that the carbon footprint of E-Vehicles is constantly improved.

The scheme should also include education around where to access public charging. Those living in rental units may not be able to arrange a charging point with their landlord. Considerations should be given for incentives for installing charging outlets on their properties.

⁵ <http://www.saferjourneys.govt.nz/assets/Safer-journeys-files/SaferJourneyStrategy.pdf>
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Access to charging stations in workplaces should also be readily available. There is an opportunity for hospitals and other health centres to provide charging facilities to enable those travelling longer distances to recharge their vehicles and bicycles during their visit. A fund for public charging infrastructure at sites such as hospitals, libraries and councils could provide a platform for better public engagement and uptake.

23. Q54 Do you support the target to reduce emissions from freight transport by 25 per cent by 2035, and the associated actions

Yes

24. Q55 Do you support the target to reduce the emissions intensity of transport fuel by 15 per cent by 2035, and the associated actions?

Yes

25. Q56 The Climate Change Commission has recommended setting a time limit on light vehicles with internal combustion engines entering, being manufactured, or assembled in Aotearoa as early as 2030. Do you support this change?

Yes

Building and construction

26. Q72 How could Government best support people, communities and businesses to reduce demand for fossil fuels in buildings?

The Strategy, in relation to building, has put a lot of emphasis on new builds. There are many quick gains to be had by focusing on energy standards for new dwellings. However, the bulk of the population lives in older houses which require additional work to make them more energy efficient. NMH would like to stress the importance of warmer drier homes from both an energy efficiency point of view and a health perspective.

People who live in warmer drier homes tend to be healthier, with fewer GP and hospital visits and fewer days away from work due to illness. Poor housing exacerbates existing health conditions and heighten the impacts of impairment. This triggers dislocation from their communities, admission to an unnecessarily high level of care and support, and shift the cost of what is primarily a housing problem onto the health and social services sectors.

Badly ventilated and poorly heated homes reduce the occupants' comfort and can adversely affect health. An analysis conducted by the World Health Organisation found that those over 65 years of age showed increased respiratory problems when living in cold dwellings in winter and children 0 to 17 years of age showed twice the prevalence of respiratory problems in poorly heated homes. Energy efficient homes result in reduced energy costs, which is important for low income households on fixed incomes, as well as helping meet the Government's sustainability objectives. The cost of electricity has risen 79% since 1990, and New Zealand's residential prices have risen faster than most other OECD countries. The Electricity Price Review shows that 175,000 households spend more than 10% of their income on domestic energy (excluding housing costs) and that children are over represented in households experiencing energy hardship.

NMH would like to see more incentives and education given to property owners to improve the energy efficiency of houses such as for solar power, double glazing, insulation and the use of heat pumps as an alternative to fireplaces.

27. Q74 Do you believe that the Government's policies and proposed actions to reduce building-related emissions will adversely affect any particular people or groups?

Yes, some property developers or construction companies that are not willing to change their practices to be more sustainable will be affected. That is why the Government needs to help them by setting up plans and policies on low-carbon construction practices including sustainable procurement in the housing and construction sector (see point 18, Q16 answer). Economic, social and environmental benefits should be demonstrated for stakeholders in this sector.

28. Q81 Our future vision for Aotearoa includes a place where all New Zealanders have a warm, dry, safe and durable home to live in. How can we ensure that all New Zealanders benefit from improved thermal performance standards for our buildings?

Please refer to point 18, Question 16

Agriculture

29. NMH notes that Agriculture section of the 131-page document is only four pages long, despite accounting for 48 per cent of the country's greenhouse emissions. Comparatively, transport (contributing 20 per cent) is discussed across 27 pages. The Action Plan for Agriculture needs to be developed fully in order to ensure a definite reduction in overall emissions.

Waste

30. Q89 Do you support the target to reduce waste biogenic methane emissions by 40 per cent by 2035?

NMH supports reducing waste at the source and by diverting waste to composting and recycling schemes over landfills when it is sensible. Waste should be reduced at the source (p.124), and can be incentivised by conducting life cycle assessments of the 'cradle-to-grave' environmental cost of a product or service and passing on these costs to the producer and/or consumer

31. Q90 Do you support more funding for education and behaviour change initiatives to help households, communities and businesses reduce their organic waste (for example, food, cardboard, timber)?

Yes

32. Q92 Would you support a proposal to ban the disposal of food, green and paper waste at landfills for all households and businesses by 1 January 2030, if there were alternative ways to recycle this waste instead?

Yes, composting is an environmentally friendly solution to waste. Compost can also be used in energy production and horticulture. Government-led industrial composting programmes and proliferation of green bins would create an incentive structure that facilitates the choice to compost organic waste. The Greenwaste system implemented by Christchurch City Council is simply for users and should be considered for national rollout.

Q94 Do you support a potential requirement to install landfill gas (LFG) capture systems at landfill sites that are suitable?

Yes

33. Q95 Would you support a more standardised approach to collection systems for households and businesses, which prioritises separating recyclables such as fibre (paper and cardboard) and food and garden waste?

Yes. Recycling is confusing for some people. There is a proliferation of "wishcycling", leading to some recyclable materials being contaminated and needing to be landfilled. Having a standardised system makes it easier for people and also makes it easier to install standardised recycling systems within buildings a more standardised approach to collection systems is needed given that COVID-19 has now disrupted Aotearoa's normal recycling export markets.

34. Q96 Do you think transfer stations should be required to separate and recycle materials, rather than sending them to landfill?

Yes

Taking Action

35. Do you have any examples of your organisation demonstrating leadership and taking action to reduce GHG emissions you could share with us?

NMH recognises that Strategy explicitly recommends that public sector building takes a lead on zero carbon. NMH has launched its hospital redevelopment project (Project Whakatapuranga) which will result in the new hospital to be designed and built to a Green Star 5 certification.

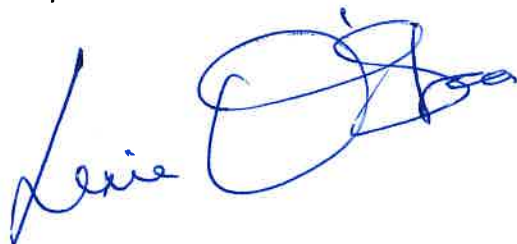
In addition, there should be additional funding for green space in health settings. These have been shown to be beneficial for the health for both patients and their families as well as staff.

Hospital site development should include well positioned cycling infrastructure and bus stops so there is easy access for those wishing to use active modes.

Conclusion

36. NMH thanks the Ministry for the Environment for the opportunity to comment on the Emissions Reduction Plan.

Yours sincerely



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