

10 November 2023

**Simon Upton**

Parliamentary Commissioner for the Environment

**Jim van der Poel**

Chair, DairyNZ

**Kate Acland**

Chair, Beef + Lamb NZ

**Wayne Langford**

National President, Federated Farmers

Cc: Climate Change Commission

Tēnā koutou,

**Re: Methane Reduction Targets**

1. I refer to the exchange between the Parliamentary Commissioner for the Environment, and DairyNZ, Beef + Lamb NZ and Federated Farmers in relation to the Climate Change Commission review of the 2050 target.
2. Reflecting on the suggestion that New Zealand's methane reduction targets should be set on the basis of "no additional warming", LCANZI's views are that:
  - a. We agree with the Commissioner that this suggestion is not prompted by a change to the scientific understanding of climate change or any other relevant matter.<sup>1</sup> As a result, it is not a relevant ground for the Commission to recommend a change to the 2050 target under s 5T of the Climate Change Response Act 2002. The relationship between warming outcomes and emissions pathways was understood through several reports before passage of the Climate Change Response (Zero Carbon) Amendment Act 2019.
  - b. Reducing agricultural methane emissions will reduce New Zealand's contribution to global warming. The "no additional warming" approach amounts to a claim that we are entitled to grandfather an existing contribution to global warming from methane. Such a claim is inconsistent with the IPCC global pathways which assume significant

---

<sup>1</sup> We would contrast this with, for example, significant changes in the understanding of the role of forestry. For example, the IEA "Net Zero by 2050" report makes it clear the concept of "net zero" should apply within the energy sector and not include forestry removals. Conversely, in IPCC AR6 scenarios forestry removals play a key role in long-term drawdown of CO<sub>2</sub> emissions overshoot.

reductions in warming from methane, as referenced in the COP26 Glasgow Climate Pact to which New Zealand has agreed, and with the Global Methane Pledge to which New Zealand is also a signatory. It is also inequitable between countries as it implies that existing agriculture can continue without taking responsibility for those emissions but that a country which increased its agricultural activities would be responsible for those emissions.

- c. Basing our methane targets on the concept of “no additional warming”, which could lead to weakening our targets for methane, would be inconsistent with:
  - i. Our commitment under the Paris Agreement to “highest possible ambition” and “progression”.
  - ii. The purpose of the Climate Change Response Act which includes enabling New Zealand to meet its international commitments, and to contribute to the global effort under the Paris Agreement to limit the global average temperature increase to 1.5° Celsius above pre-industrial levels.
  - iii. Once ratified, our obligations under the EU Free Trade Agreement including our obligations to “effectively implement the UNFCCC and the Paris Agreement, including commitments with regard to nationally determined contributions” and “not weaken or reduce the levels of protection afforded in its environmental ... law in order to encourage trade or investment.”

3. We are happy to engage with you further on this matter.

Yours faithfully



Jessica Palairt  
**Executive Director, Lawyers for Climate Action NZ**