

**BRCT submission on Te Ao Tūroa – The Natural World
Dunedin’s Draft Environment Strategy**



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The Chief Executive Officer
Dunedin City Council
PO Box 5045
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Submission on the Dunedin City Council’s Dunedin’s Draft Environment Strategy

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We, Blueskin Resilient Communities Trust, wish to speak to our submission

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1 Overview

Thank you for this opportunity to submit to the **Dunedin City Council's Dunedin's Draft Environment Strategy**.

The Blueskin Resilient Communities Trust (BRCT) is a registered charitable trust formed in 2008 to support sustainability and transition initiatives in a planned and structured way. We work as a legal body to provide a public benefit and achieve the long-term objective of building community resilience, particularly in the context of our changing climate. Our headline work is our community wind development and our core activity areas are in energy (Cosy Homes), climate change action, and provision of community services. We offer support to number of community groups working in the field of sustainability. Jeanette Fitzsimons is our patron.

The draft Environment Strategy is attractively set out, however it is lacking a robust emissions reduction target, which is critical to any environment strategy. The Themes and Objectives are well set out and thought has gone into the priorities, while there is still work to do to enable evaluation of progress on the strategy.

We see many opportunities in strengthening strategic relationships, and in using good process to assist prioritisation. Our changing world requires innovation and creativity and we offer our support to the DCC in addressing the challenges ahead.

2 Our thoughts on the draft strategy

2.0 Things to add: a robust Emissions Target

Your summary document is attractively set out. It clearly indicates that this strategy is one of a small number of important city strategies. However the equal weighting of this strategy against others actually disguises the centrality of the environment to all our activity. Maintenance of the “*integrity of all ecological systems in the biosphere*”¹ is critical for social wellbeing and all economic activity that is enabled in a healthy society. This is simply set out in the ‘Strong Sustainability Model’ as proposed by Phase 2 (diagram below).



Given the centrality of the environment to all activity, and given the harsh reality of anthropogenic climate change, we request that a robust **Emissions Target** is added to the strategy to further help guide each theme and direct action. The purpose of the **Emissions Target** will be to make it explicit, beyond all doubt, that we are serious, as a city, about addressing climate change. Human activity since the 1800’s has released locked up carbon, ending 11,000 years climate stability, and ending 11,000 years of stable coastlines. As argued in the Wellington Regional Council’s Draft Climate Change

¹ In 'Definition of strong sustainability', at: <http://nz.phase2.org/what-is-strong-sustainability>

² Ibid.

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Strategy, “while some of the impacts of climate change are now inevitable due to the accumulation of past and current greenhouse gas emissions in the atmosphere, the speed and magnitude of impacts in the longer term will be decided by how quickly countries – including New Zealand – reduce greenhouse gas emissions”³. The implications of climate change for all we do are so great, and so complex, that the world’s best scientists are unwilling to predict consequences, except to suggest that we are faced with a future that could indeed be catastrophic for humanity if we do not rapidly aggressively reduce and eliminate greenhouse gas emissions from this point on. Currently we must grapple with rising sea-levels and increased storm incidences, which increase risk to people and housing in urban and rural areas, as well as risk to infrastructure and ecosystems. The PCE has released a solid science based report on ‘Changing climate and rising seas’⁴, which clearly indicates the seriousness of our current situation. The New Zealand Climate Change centre urges retreat from areas most at risk from flooding, storm surges and other natural hazards amplified by climate change⁵.

We propose an **Emissions Target** to be stated as follows:

“We maintain our environment in order to safeguard future generations through reducing greenhouse gas emissions by 5% per year to achieve carbon neutrality by 2050.”

Climate change is the biggest threat not only to human life, but also to biodiversity, cultural heritage, material infrastructure, our economic systems, and the natural world as we experience it. This **Emissions Target** reflects the public mood for ambitious action, as we learned during the Ministry for the Environment’s consultation hearings on New Zealand’s Climate Change Target⁶.

2.1 Vision and Themes

We support the vision and themes, however the strategy as a whole does not clearly reflect the seriousness of climate change, and as we’ve indicated above, an emissions target is necessary to be able to evaluate whether the strategy is proving to be effective or not.

³ <http://www.gw.govt.nz/assets/Climate-change/WGNDocs-1439979-v1-GWRCDraftClimateChangeStrategy.PDF>, Page 3,

⁴ Parliamentary Commissioner for the Environment. 2014. Changing climate and risking seas: understanding the climate.

⁵ New Zealand Climate Change Centre. 2014. Climate Change IPCC Fifth Assessment Report New Zealand findings.

⁶ http://www.mfe.govt.nz/sites/default/files/media/Climate%20Change/nz-climate-change-target-summary-of-submissions_0.pdf

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2.2 Objectives and Priorities

The Objectives and Priorities do not reflect the urgency we believe is required if climate change is to be addressed meaningfully. This is primarily a question of language within the Objectives. The priorities, however lack teeth as well. We believe one of the priorities must be the development of an implementation plan to measure and report on emissions reductions, and such a plan could be managed by the Sustainability Audit Sub-Committee at the Council.

2.3 How to measure success?

As above, success will be able to be measured against an emissions target and through reporting against an implementation plan. While the plan must focus on reducing emissions, many of the actions which could contribute to lowering emissions might be present within other work areas or plans, such as *Cosy Homes* within the Energy Plan and implementation pathways for *Better Homes* within the Social Wellbeing Strategy. Where other strategies and policies are delivering success in the Environment Strategy as well, these should be noted. To be able to do this, and where there are clear linkages to other strategies and policies, linkages should be made explicit at the outset, as success can be measured in different ways. For example, success in the Social Wellbeing Strategy may be measured by counting the number of homes insulated under schemes or number of homes receiving Home Performance Assessments, while the same results can be used to measure the reduction in household greenhouse gas emissions. For example, a full house insulation retrofit involving ceiling, underfloor, walls and draft stopping, along with double glazing can result in a household greenhouse gas emissions reduction of over 1 tonne of Carbon Dioxide Equivalent (tCO₂e) per year.

The draft strategy contains priorities that should include a plan with milestones or KPIs, to allow evaluation and a measure of success. For example, under *Theme 3: Environment for the future*, it is stated that “*We will reduce reliance on non-renewable products and reduce the carbon footprint from our infrastructure and systems*”. How will this be measured, what is the timeframe, and what is extent of reduction of carbon footprint? Some Key Performance Indicators will give this strategy some teeth.

Success will be ultimately measured against the **Emissions Target**, and progress on the target, simply because the most rational and important course of action to support the strategy vision is to reduce emissions and reduce our climate change impact. Therefore this one measurement trumps all other measures – it is the ‘pass’ or ‘fail’ measure.

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It is stated that “*This Strategy has identified some strategic goals which will be used to monitor success and change in the city’s environmental wellbeing*” however it is not clear what these strategic goals are, or where they are highlighted. It would be helpful if the proposed goals can be made clear to allow for feedback, and we apologise if we have somehow overlooked any section of the Strategy that details these goals.

3 Putting the Strategy into action

3.0 Priority Actions and key stakeholders

- Creating a robust Emissions Target, with annual emissions reduction goals. Stakeholders include: the New Zealand Climate Change Research Institute (VUW)⁷; the Centre for Sustainability (Otago); MfE. It should be noted that the Baseline Energy Study⁸ does contain data on greenhouse gas emissions resulting from city energy use.
- Establishing Fiscal Instruments to hasten green technology uptake, for example applying the targetted rate scheme to solar PV installations and providing rebates on Resource Consent costs for renewable generation developments. The stakeholder is: the Dunedin City Council.
- Strengthening the ‘Buy Local’ campaign, for everything from food to electricity, with co-benefits for the local economy, but crucially reducing greenhouse gas emissions from transport and/or distribution. Stakeholders include: the DCC; the University of Otago; the Otago Chamber of Commerce.
- Building/strengthening community partnerships, to ensure wide participation in achieving goals to achieve the vision, with particular emphasis on ecosystem-based local food production. Stakeholders include: the DCC; Kāi Tahu ki Otago; NIWA; local environmental organisations/groups such as BRCT; ORC; MfE.
- Steadily reduce greenhouse gas emissions from city energy use, through concentrating on *Transport* (59% of emissions from energy supplies into the city), *Electricity* (17% of emissions), and *Heating* (24% of emissions), and replacing fossil fuels with renewables. Stakeholders include: the DCC; the University of Otago; the Otago Chamber of Commerce; Pioneer Generation; Blueskin Energy Ltd; Delta; PowerNet; ChargeNet; Drive Electric; NERI; MBIE; Pure Advantage.

⁷ “CCRI Director, Prof Dave Frame, has been recently appointed as the Director of the Deep South National Science Challenge. For more information, please visit: <http://www.deepsouthchallenge.co.nz/>” See: <http://www.victoria.ac.nz/sgees/research-centres/ccri>

⁸ The Dunedin Baseline Energy Study: Draft Report is currently undergoing review. Cle-Anne Gabriel, Janet Stephenson and Gerry Carrington have prepared it for the Otago Chamber of Commerce and the Dunedin City Council from the Centre for Sustainability.

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3.1 *What is BRCT doing already?*

We work as a legal body to provide a public benefit and achieve the long-term objective of building community resilience, particularly in the context of our changing climate. Our headline work is our community wind development to provide our community and energy clients with clean and efficient energy, and a revenue stream to invest back into sustainability projects and environmental actions. Once up and running, we anticipate that the Blueskin wind development through provision of local renewable electricity could reduce emissions from electricity for the University of Otago by 16.5%, if the University was a purchaser of Blueskin Energy electricity. We also provide a range of energy services including Home Performance Assessments, and work to catalyse climate change action. We offer support to number of community groups working in the field of sustainability. Like many environmental organisations, we substantially rely on grants and philanthropy to sustain our work, while demand for our services is growing.

We have worked with the DCC previously on climate change planning for Waitati⁹ and conducted research on a Blueskin and Karitane Food System¹⁰, and we intend working on solutions for residents in the climate change 'hot spots' of Waitati and Long Beach. We are looking for partners to help us undertake this work.

3.2 *What is the Council's Role?*

The role of the Dunedin City Council in achieving the Objectives is critical. The Strategy lists the DCC's current roles in relation to the Objectives, but reveals little about the Council's intention to continue or take a leadership role to achieve the Objectives. Organisations working on environmental issues are working in probably the most critically under-resourced sector, when considering all other Council Strategies and stakeholders. And yet, given the centrality of the environment to social wellbeing, to economic activity, to arts and culture, to parks and recreation, to 3 waters, to spatial planning, and to transport, the lack of resource for environmental care and maintenance of an environment for the future is very concerning.

As a community we must learn to live within safe environmental limits. The Council is our collective representative body and organisation, and has the ability to target public investment for positive outcomes. Local government exists for and from its community and must represent community interest. Community interest includes the social, economic and cultural wellbeing interests of people and communities; and maintains and enhances the quality of the environment; and meets the foreseeable needs of future

⁹ See: <http://www.brct.org.nz/resources/brct-publications/>

¹⁰ Ibid.

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generations. We seek Council leadership, particularly on setting an emissions target and implementation plan, with key priority actions.

4 Summary

Most organisations working on environmental issues are under resourced and yet very engaged in addressing the environmental challenges and exploring environmental opportunities. The short consultation period associated with this strategy and the limited stakeholder consultation during the development of the strategy may limit the quality and depth of feedback. We look forward to contributing further at the next stage of this consultation.

5 Other submissions and initiatives we endorse

We will make reference to other submissions we support at the formal presentation of our submission.

We thank you for your attention to this submission

Yours sincerely,



Scott Willis
Manager
Blueskin Resilient Communities Trust