

SUBMISSION

CLIMATE CHANGE COMMISSION 2021 DRAFT ADVICE FOR CONSULTATION

Key message

1.0 We thank the Commission for the opportunity to participate in this major policy process. Mārae communities sit vulnerably in the midst of current GHG patterns and will be at the frontline of climate change policies, from geographic, economic and cultural points of view.

We believe that the targets to meet the general goal of reducing emissions to keep within 1.5 degrees of change since pre-industrial levels need to be bold. We note (p.147) “limiting warming to 1.5°C requires rapid emission reductions of all greenhouse gases between now and 2030”. The targets also need to reflect our particular national profile, particularly greenhouse gases from agriculture which represent approximately half of all GHG, which is more than any other developed country in the world, and almost 90% of all biogenic methane emissions at 2018 (p. 28). Deeper emissions reductions from biogenic methane are needed. A split gas domestic target approach that accounts for carbon dioxide and biological methane in applying the IPCC’s modelling is also important and the process for achieving reduction goals must engage mārae communities who are mostly rural and who live in the midst of the greatest GHG-producing regions.

We strongly agree with the recommendation (at p. 154) that “the contribution Aotearoa makes over the NDC period should reflect a reduction to net emissions of much more than 35% below 2005 gross levels by 2030, with the likelihood of compatibility increasing

as the NDC is strengthened further.” The IPCC modelling creates averages of gas emissions removals. The NZ profile is unique and different to other countries, especially given the heavy agricultural outputs and emphasis over decades. Policy needs to be tailored specifically to these circumstances.

We also note (at p.27) that “Gross emissions are projected to decrease as a result of current government policy. However, this decrease would not be enough to meet the country’s 2030 and 2050 emissions reduction targets for biogenic methane and long-lived gases.” This point underpins our view that a stronger and targeted approach especially regarding biogenic methane is absolutely necessary.

Who we are

- 2.0 We represent the Kainga and Climate Change team of researchers from tertiary and private sector organisations and marae communities from throughout Aotearoa who jointly submit this submission on the Climate Change Commission’s 2021 Draft Advice.
- 3.0 We are the largest Māori community and Māori researcher-led research project to be funded by MBIE’s Endeavour Research fund. Our primary goal, between 2019-2024, is to investigate and develop novel kāinga plans and leadership strategies in response to the challenges and opportunities of climate change.
- 4.0 We are social and physical scientists, graduate and undergraduate students, Māori community leaders involved as Māori land trust, marae and other kāinga-based organisations and innovation experts. Signatories also include members of neighbouring marae who are not formally part of this project but who have joined in for this submission.

Marae at the heart of climate change problems and solutions

5.0 We submit these views on the Commission's proposed policy pathway on reducing greenhouse gas emissions for Aotearoa on the basis of 4 key premises:

- 5.1 That it is essential to engage with and hear local marae community views in shaping next step policies and strategies. Iwi represent the multitude of social, economic, political and environmental issues of their constituent members, but it is at the marae level where climate change effects are directly felt. Marae are living communities while iwi are political entities and identities that represent (generally) a broad range of communities. It is, therefore, important to have evidence-based perspectives by marae communities who will directly bear the effects of policies. This point also speaks strongly to the principle of policy being influenced and shaped by those whose lives will be affected by it. At the same time, it is important to not essentialise 'the' Maori voice to, and equate it with only 'iwi'. Policy shaping must be as inclusive as possible.
- 5.2 That there should be strong inclusion, recognition and provision of tikanga-shaped solutions in climate change national responses. These solutions should be underpinned by kaitiakitanga and the protection of mauri or balanced systems across integrated human and land catchments. This broad approach will help to achieve a low carbon future for all;
- 5.3 That recognition of transitioning to low carbon futures will cost and there are likely equity issues for many, especially Māori generally and marae communities specifically. These must be addressed; and

- 5.4 That Te Tiriti articles provide the foundation basis to shape the right kind of future to transition towards an equitable, just and fair low carbon future; a future that focuses squarely on Article 2 emphasis on whenua, kāinga and taonga, and the exercise and protection of rangatiratanga in relation to these. Te Tiriti is squarely focused on marae which are the face to face kāinga. In short, transitioning to a low carbon future must accord with Te Tiriti o Waitangi.
- 6.0 In terms of the ‘now’ situation, existing inequities and struggles in marae communities (see 8.0) will likely be exacerbated if marae-focussed strategies and policy co-development and engagement is not followed.
- 7.0 We also agree with the Commission’s position (at p.3), “what each of us can do depends on our circumstances. We will need to offer support to those most adversely impacted and who are also least able to absorb the impact of change.” Low carbon transition financial support should, therefore, be specifically scheduled toward marae (including Māori land trusts/owners, see 12.0) to help their communities adapt, in line with the Commission’s recommendation.
- 8.0 Current economic problems at the marae community level that need careful consideration under a new climate change policy regime include, for example:
- 8.1 Marae community whānau commonly have old, cheap cars and would struggle to afford newer, electric or hybrid vehicles. Most marae are rural and out of reach/range of public transport. The reliance on private transport is therefore greater than urban-based communities;
- 8.2 Whānau often have cheap imported appliances that are expensive to run as well as open fires. Costs to replace with newer energy efficient appliances may be too high;

- 8.3 Whānau often have highly processed cheap furniture; furniture which has high energy costs to manufacture, limited/short lifespans and do not necessarily decompose, adding to landfill pollution and will likely be replaced by similarly imported cheap furniture. The costs to buy new more energy-efficient appliances and furniture are likely too high;
- 8.4 Marae buildings are often uninsulated, or have poor quality insulation and poor materials, making them energy inefficient to operate. More isolated marae are reliant on diesel generators to operate. Retrofitting and/or improving marae buildings and facilities to be more energy efficient, like solar is a major cost issue.
- 8.5 Success at fundraising from community trusts or receiving support from iwi or TAs to upgrade to more energy efficient operations is haphazard and dependent on skilled leadership, not least understanding the compounding impact climate change is already having on the future sustainability of kāinga/marae communities;
- 8.6 Car and tyre ‘dumps’ as well as ‘junk yards’ of old appliances are common in marae communities, leaching contaminants that are likely pluming in aquifers. Costs of safe dispose of unwanted materials at regulated/compliant waste collection centres are prohibitive and/or are far away.
- 8.7 Rural Māori communities are beginning to restore the food and fibre production potential of their whenua to pre-European levels. Regressive policies risk locking land into “under-utilised” options such as “scrub”. Costs of land use may be beyond marae communities compared with “asset rich” land owners.
- 9.0 Marae also experience the effects of climate change now – increased high intensity rainfall causing flooding, increased run off into waterways (therefore pollution) and increased erosion. For susceptible coastal marae, problems will be compounded by rising seas contributing to increased sedimentation in, and salination of, waterways, further erosion

and flooding. Climate change as well as coastal plans, policies, rules and regulations must be aligned. Marae communities who are signatories to this submission (and other marae) are affected by these matters raised and have also directly been affected by the increased frequency and intensity of droughts.

- 10.0** Historically, marae communities have been driven into agricultural production of their remaining lands. The idea of farming often conflicts with customary land use and tenure. It conflicts with principles of kaitiakitanga and the protection of mauri, yet out of economic necessity farming became a central economic plank of hapū and marae communities via land trusts and incorporations, per government law and policies (e.g. Ngata's land development schemes in the 1920s and the successors of these programmes that have continued through to today).
- 11.0** As stated most marae are rural and are nestled in the midst of the major GHG generation sources. Almost 50% of farmed Māori-owned lands are in grassland for agricultural production and many have converted into dairy. (More generally, approximately 5-6% of the total NZ landmass are Māori-owned and by far the majority of these lands are nestled within marae locales.) In 10 years to 2016 alone, dairy cattle on Māori land increased by 84.8 percent, contributing towards the surge in nutrient leaching into waterways and soils. Intensified farming practices exacerbate environmental problems and risks to low carbon futures.
- 12.0** It is essential to provide support to Māori land owners and trusts operating on their behalf to help them transition towards lower GHGs. The solutions may be technological but important in the mix for transitioning is to encourage land-use change and/or better land

use that supports low carbon and low methane footprint enterprises. Resourcing of the transition is also needed when Māori land owners cannot borrow against their land.

13.0 The solutions should also encourage use of under-utilised Māori land. There is huge opportunity to help address the climate crisis through this focus because the vast majority – over 70% of all Māori freehold land (just under one million hectares of approximately 1.4 million hectares) – is in this category.

14.0 On land use change and improved land use, we wholeheartedly agree with the Commission (at p.68): “There are changes that farmers can make now to reduce emissions on their farms, if given sufficient support. These can improve animal performance while reducing stock numbers, reducing the number of breeding animals required, and moving to lower input farm systems. The Biological Emissions Reference Group found that, when successfully implemented, these changes could be made while not significantly reducing production and while maintaining or even improving profitability.” We also argue strongly for land use to focus more towards hua whenua enterprises or ‘horticulture’, such as the multi-marae community Pā to Plate food (circular) economy that supports marae-based growers to provide food to descendants wherever they live (at/near marae or away in towns in cities) and where consumer descendants return food scraps back to source marae for composting. The Commission’s upper range of biogenic methane emission reductions (e.g. at pp.175, 179) should be focused on through destocking, improved land use and land use change all the while protecting economic, social and cultural aspirations and wellbeing.

15.0 On improved land use, we also strongly argue for clearer goals for protecting and enhancing natural carbon sinks like repo/wetlands, in addition to native forestry

development. These (and other) efforts will also have a combined positive affect on improving freshwater health which is a major concern nationally.

- 16.0 Land use change (e.g. restoring wetlands, changing from dairy to horticulture) and investment in reducing GHG emissions from energy and transport by marae communities will be costly. To support marae communities in the transition a combination of compliance (Emissions Trading Scheme) and funding of voluntary offsetting in carbon-reducing activities is needed.
- 17.0 Rural Māori communities are probably some of the lowest emitters of greenhouse gas emissions per head of population (necessary vehicle use excepted). Greenhouse gas mitigation policies should target higher emitters as a first priority, while ensuring that lower emitters (often the least wealthy) are not penalised through regressive policies.
- 18.0 Te Tiriti o Waitangi text is a pivotal anchor point for marae to orientate Crown engagement with them regarding the protection of rangatiratanga within a climate change/transition to a low carbon future. This means that policies must be shaped with particular reference to protecting the exercise of rangatiratanga in relation to whenua, kāinga and taonga (see also 19, 20 below). The equity, support and policy engagement issues referred to are key aspects concerning whenua, kāinga and taonga. Specific policy foci regarding whenua include all those elements of whenua within ancestral territories covering, for example, forests/forestry, wetlands and water (rivers, lakes, coast etc). We expand further again on Te Tiriti under ‘specific aspects of the draft report’ at paras. 19, 20.

Other responses to specific aspects of the draft report

19.0 Consultation question 7 regarding “Enabling recommendation 3”: “Genuine, active and enduring partnership with iwi/Māori”: We recommend the following text revisions as they apply at a regional level:

“We recommend that, in transitioning Aotearoa to a thriving, climate-resilient and low emissions future, central and local government take action to ensure genuine and enduring partnership with kāinga/Māori that gives effect to the *Te Tiriti o Waitangi* guarantee of the protection of rangatiratanga. This in turn recognises:

a. The exercise of rangatiratanga will be principled on the activation of kaitiakitanga and manaakitanga in relation to whenua, kāinga and taonga.

b. Tikanga and kotahitanga will guide the nature of partnership between central and local government with kāinga/Māori so that Māori communities can prepare for and transition to a climate-resilient, low emissions Aotearoa. The purpose of the multi-layered partnerships will be to support kāinga/Māori aspirations for intergenerational wellbeing within a changing climate; aspirations that are shared by many New Zealanders.

c. Whanaungatanga by enhancing relationships within whānau and communities and with the whenua (land) and wider taiao (environment).

20.0 Consultation question 7: We have a second point relating to consultation 7. As discussed, marae (inclusive of Māori land trusts, kohanga reo and other entities) who are at the heart of hapū and iwi must be at the table to help shape policies. A number of questions need to be discussed with marae representatives regarding specific, local climate change issues and aspirations and national issues such as the national domestic emissions targets, the

NDC which includes offshore mitigation, and the costs / benefits of whether the NDC should be more stringent at the second NDC, etc. Discussions about the requirement for NDCs to show progress over time (p.162) is also important, including the implications of this for marae. We recognise the complexities of NDCs within a foreign policy context but the point we make is that it together with all aspects of policy will significantly affect marae futures. For these and other reasons, we suggest that a **National Marae Collective Taumata** be established to engage with the Crown. This is to support regional initiatives between marae and hapu, local and central government etc, on specific programmes. The process for representation could be determined internally within iwi who call for marae representation. The process should see marae representation being proportionate to iwi size but details on how the process works can be developed by the Crown with advice where necessary.

21.0 We agree with **Necessary Action 18** regarding developing a Māori emissions profile but again, this must include marae-level evidence. The profile should be linked to a more general Māori and climate risk assessment framework that may then guide regional and local plans.

22.0 At 1.2 the Commission sets out tikanga values, as drawn from the wider body of work undertaken in 2020 with Māori (as outlined in chapter 6 of the evidence report). We agree with these but add that mauri must be at the centre of them all. Mauri is about balanced energy across a system (e.g. eco-system) which is achieved through good stewardship or kaitiakitanga. This is a simplified overview of a complex values system but for the purposes of this submission, we argue for better understanding and inclusion of mauri to address climate change challenges unique to the 780 kāinga (marae community) catchments of Aotearoa.

23.0 We also argue that the costs of reducing greenhouse gases should lay proportionately to emitters. This is important because the combined effect and combined emissions in New Zealand have seen our country become one of the worst performers in the OECD, with a net emission increase between 1990-2018 of 57%.

24.0 At 9.4.4 (p. 178) regarding biogenic methane, we argue that compared to other developed countries, Aotearoa “must” (not “could”) make a greater than average reduction in biogenic methane. Reductions in biogenic methane are needed for Aotearoa to reduce our overall GHG emissions. These reductions can be realised through land use change (including restoration of wetlands and forests) and destocking that emphasises the “best” use of the land. These options for reducing GHG emissions also improve environmental and community wellbeing outcomes.

25.0

We note the seven Principles listed at pp.29-30 are intended “to help guide our advice and the transition to a thriving, climate-resilient and low emissions Aotearoa”. That implies two functions for the principles: ‘Guide our advice’ is one function which is the CCC’s own task, but “the transition” is a separate (albeit linked) function led by the government. In this light, given the government’s role as the Treaty partner, the glaring omission from the Principles is that the transition must accord with Te Tiriti o Waitangi.

The current Principle 5: “Transition in an equitable and inclusive way” in no way stands for nor implies Te Tiriti.

We note that at section 5.2 (p.80) on creating a fair, equitable and inclusive transition has a bullet point list of important criteria, the first of which is ‘Honouring the principles of Te Tiriti o Waitangi’.

It is inappropriate to rely on vague reference to (Treaty/Tiriti) “principles” then “honouring” them, and that Te Tiriti is a bullet point side by side other bullets in this section (5.2). Framing is important. Te Tiriti has much broader implications for the transition than just fairness and equity. It is the foundation document of Aotearoa, and therefore has constitutional importance as widely recognised. The development of policies and laws must recognise this importance. Specifically, transitioning to a low carbon future must protect the exercise of rangatiratanga from a Tiriti-based partnership. This point is alluded to better in Figure 6.1 at p. 105 “Elements of an effective climate policy package” which has ‘Partnership approach with iwi/Māori at the top of the diagram, relating to everything. The ideas at 5.2 tried to capture the importance of Te Tiriti, but it does not sit alongside the other points made there.

- 26.0 The climate change crisis concerns the realms of Papatūānuku and Ranginui: human communities, land, water and ecosystems within. Marae need to help guide solutions that in turn help Aotearoa transition to a low carbon future. It is important to recognize and provide for Māori forms of leadership from the ground up. It will be the leaders who in their understanding of the climate change challenges will help bridge the gap between targets and reality. Part of this recognizes that Papatūānuku is not a business model and where responses to climate change should focus on wellbeing or *oranga*. In other words, we need to think carefully about climate change not simply from a growth perspective. New Zealand can also have a leading voice internationally in how it is fulfilling its international obligations on climate change from an Indigenous point of view.

Thank you receiving our submission. We look forward to seeing the next steps unfold.

[signed]

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