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TE REO O TE TAIAO | Giving Nature a Voice



Environmental
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LAWYERS FOR
**CLIMATE
ACTION** NZ INC.

Hon Simon Watts
Minister for Climate Change
Private Bag 18888
Parliament Buildings
Wellington 6160

28 May 2025

Tēnā koe Minister Watts

We have observed a recent escalation in communications from industry groups about methane targets and the Paris Agreement. We are writing to express our concern and request a meeting to brief you on these matters.

Federated Farmers recently stated that it [intends to 'go to battle' over a 24% reduction of methane emissions](#) by 2050, the lowest end of New Zealand's current methane target range and far below the Climate Change Commission's updated recommendation of 35–47%. This mirrors [communications from Beef + Lamb NZ](#).

Federated Farmers members are proposing that the group back a withdrawal from the Paris Agreement and Groundswell has begun a billboard campaign to the same end.

No additional warming and the methane target

The concept of *no additional warming* is not based in science. It is a way of accounting for emissions differently, which downplays climate pollution from countries with high historic livestock emissions. The key flaw in this methodology is that it ignores historic pollution. Accounting this way won't make that pollution – or its warming impact – go away. It simply shifts the burden of climate action onto other sectors or nations, or allows for the acceleration of global heating.

According to UNEP and the Climate and Clean Air Coalition, [methane emissions must come down by 45% by 2030 compared to 2020 levels to stay within the Paris agreement](#). Atmospheric methane levels are now [more than 2.5 times higher](#) than pre-industrial levels. In the last 20 years, [livestock related methane in particular has increased](#) by 12.5% due to more production

and consumption of livestock. This rise has far outpaced the ability of natural systems, technology, or sustainable farming practices to absorb it.

The warming impact of biogenic methane is not meaningfully different to fossil methane. According to the Clean Air Task Force, *"Physically, [a ton of methane warms the climate almost precisely the same whether it comes from sheep, a landfill, or an oil well](#), and it doesn't matter whether that source is new or has been emitting for decades."*

Though methane stays in the atmosphere for about 12 years, it is around [80 times more powerful than CO₂ over 20 years](#) and is linked to roughly [30% of the global warming the world is experiencing today](#). Far from being a reason to weaken ambition on livestock emissions, **there is [scientific consensus](#) that methane's powerful warming effect and short atmospheric lifetime is what makes reducing it the key to slowing down global heating in the short term.**

Urgent action on methane is critical with average global temperatures nearing 1.5°C above pre-industrial levels, as it will reduce the risk of temperature overshoot. Described as an "emergency brake" in the climate crisis, methane must be addressed boldly. The Government should follow the guidance of its independent, science-based Climate Change Commission and strengthen the biogenic methane target, not weaken it.

For a fulsome analysis of *no additional warming* please see attached a paper by Kristen Green, commissioned by Lawyers for Climate Action.

Our trade agreement obligations and customer expectations

Adopting the concept of *no additional warming*, and thereby weakening national methane reduction targets, would [undermine commitments under the Paris Agreement](#). This is likely also a breach of the EU-NZ FTA Article 19.6(2)-(3) which commits Parties to *effectively implement the United Nations Framework Convention on Climate Change and the Paris Agreement, including commitments with regard to nationally determined contributions, which includes the obligation to refrain from any action or omission that materially defeats the object and purpose of the Paris Agreement*.

It also goes against Art 22.6 (2) of the UK-NZ FTA which states *the Parties affirm their commitment to implement the Paris Agreement and to take action to reduce greenhouse gas emissions with the aim of strengthening the global response to climate change*.

Applying *no additional warming* to livestock emissions generally would lead to inequitable conclusions, [putting most developing countries at a disadvantage compared to developed countries](#). Equity is at the heart of Article 4 of the Paris Agreement. Weakening our methane target by applying what is effectively a creative accounting tool that advantages developing countries with high historic methane emissions would seriously undermine our reputation as a good global citizen.

It is possible to reduce methane now - by supporting ecological farming and smaller herds, shifting towards more plant-based foods and eliminating food waste. This transition would benefit not only the climate, but also biodiversity, animal welfare, water health and air quality. It would also align with the expectations of our global customers.

We look forward to meeting with you to discuss this further.

Nā mātou noa, nā



Dr Russel Norman
Executive Director
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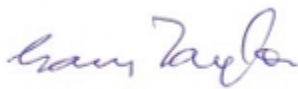
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