

Submission on proposed amendment to New Zealand's Second Emissions Reduction Plan (2026 to 2030)

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SUBMITTER DETAILS

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1. This is the Environmental Defence Society's (EDS) submission on the Ministry for the Environment's Discussion Document "Amendment to New Zealand's Second Emissions Reduction Plan 2026 – 30" ("**Discussion Document**").
2. EDS is a not-for-profit, non-government national environmental organisation. It was established in 1971 with the objective of bringing together the disciplines of law, science, and planning to promote better environmental outcomes in resource management.
3. EDS is pleased to be able to submit on this important issue. Adequate consultation improves policy outcomes and can also reduce legal risk by providing a channel for significant issues to be addressed before policy direction is cemented. However, we question whether this process represents adequate consultation in line with s 5Z1 of the Climate Change Response (Zero Carbon) Amendment Act 2019 ("**Act**"), given that the outcome appears pre-determined.
4. Our submission responds to Questions 1, 2 and 4 of the Discussion Document.

Q1. What, if any, other impacts or consequences of the revised approach to reducing agricultural emissions should the Government be aware of?

5. We strongly disagree with the decision to not proceed with agricultural emissions pricing by 2030. As discussed in the Emissions Reduction Plan ("**ERP**"), incentives are important for adoption of technologies as they are developed. Relying only on corporate voluntary targets as a driver of action leaves achievement of national targets out of government control, and ignores significant abatement opportunities that are not covered by those targets. Leaving cost-effective reductions on the table raises the cost of New Zealand's climate response. Emissions pricing can

also provide broader incentives beyond technology uptake for more economically rational land use, including lower-emissions food production options and native forest restoration.

6. We remain concerned that each government back-track on environmental standards and policies raises the risk of consequences for New Zealand's international market access for agricultural products. It is high risk for New Zealand to be ignoring the direction of travel toward stronger, not weaker, climate action. Our free-trade agreements require New Zealand to effectively implement the Paris Agreement and to not weaken, reduce, waive or otherwise derogate from environmental laws.
7. The proposed amended ERP now misses the 2030 biogenic methane target, achieving only a 7.9% reduction instead of the legislated 10%. That makes the ERP not fit for purpose: a policy plan that does not meet targets is clearly inadequate.
8. EDS has repeatedly warned that other sectors would be left to pick up the slack if agriculture does less. We see that playing out here: non-ETS emissions are 4Mt higher in Emissions Budget 2, and 7.5Mt higher in Emissions Budget 3 than in the previous projections. The Discussion Document claims that this is acceptable because lower ETS sector emissions can compensate for higher agricultural emissions. However, if ETS sectors are moving faster, that should be used to ratchet up ambition and reduce the cost of meeting our Paris Agreement Nationally Determined Contribution, not to allow our targets to become more costly by allowing back-tracking in agriculture.

Q2. What actions could the Government consider taking to further support a market- and technology-led approach to reducing agricultural emissions?

9. Emissions pricing is by definition a market approach. A well designed emissions pricing system can support New Zealand exporters by aligning our domestic environmental standards and outcomes with the expectations of global markets.
10. While voluntary corporate targets are laudable, the government should be aligning sector-wide policy with the ambition of front-runners (e.g. Fonterra's 30% reduction target for 2030) to help them succeed.

Q3. What are your views on ERP2 with the revised approach to reducing agricultural emissions?

11. The ERP2 published in 2024 was inadequate, and this proposed revision only makes it worse. We cannot see how a 2026-30 policy plan that fails to meet the 2030 biogenic methane target can be seriously proposed. Additional policies and actions should be added so that, at a minimum, that target is achieved.