

## Response ID ANON-9W22-T9BA-4

Submitted to Updating Aotearoa New Zealand's Approach to International Climate Change Negotiations  
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What is COP, and how does New Zealand participate?

### Submitter Details

What is your name?

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Association - please select any that apply

Industry Association

If you are submitting on behalf of an organisation, please provide your organisation name:  
New Zealand Forest Owners Association (FOA)

Location

New Zealand

Section 1: What do you think New Zealand should be seeking to achieve through our participation at COP?

How can New Zealand best use COP to advance effective and ambitious global action?

Enter your answer here:

What areas are most critical for New Zealand to promote effective and ambitious global action at COP?

Importance - Global emissions reduction (Mitigation):

Importance - Increasing resilience (Adaptation):

Importance - Climate finance and technical support for climate action in developing countries:

Importance - Aligning global financial flows with the net zero transition:

Importance - Loss and damage:

Importance - Nature-positive climate action (e.g. through native ecosystems and nature based solutions, addressing the linkage between the biodiversity and climate crises):

Importance - Trade policies and instruments that support climate action:

Importance - Agricultural sector climate action:

Importance - Circular economy and sustainable industry (e.g., reducing plastic waste, etc.):

Importance - Technology, innovation and transfer of technology:

Importance - Other (please specify below):

Why? Tell us more:

How can New Zealand best leverage participation in COP to support our own low-emissions transition?

Enter your answer here:

What areas are most critical for New Zealand to promote our domestic transition through our participation at COP?

Domestic Transition - Insight into other countries' transition policies (e.g. on just transition, or implementation of nature-based solutions):  
Somewhat Important

Domestic Transition - Cooperation with other countries to support New Zealand's transition (e.g. on transport, attracting used EVs):  
Very Important

Domestic Transition - Promoting New Zealand as a low-carbon tech proving ground/green investment destination:  
Very Important

Domestic Transition - Access for New Zealand businesses to world-leading international businesses' transition technologies and business models:  
Somewhat Important

Domestic Transition - Export opportunities for cleantech or carbon-efficient New Zealand exporters:  
Somewhat Important

Domestic Transition - Other (please specify below):

Why? Tell us more?:

If you are a business or you represent a Māori, civil society or industry organisation, are you considering participating in COP? Why/why not?

Enter your answer here:

No. FOA have previously been involved but the opportunity to influence outcomes is now at a level where our involvement isn't justified.

Supporting the Pacific is a key component of our approach to COP. What do you think is important to consider as we do this, and why?

Enter your answer here:

In considering our assistance to our Pacific partners we need to weigh the growing cost to the New Zealand economy of our own NDC.

Indigenous leadership: What role should New Zealand play in amplifying indigenous voices in the global climate change regime? How can we do this most effectively?

Enter your answer here:

Nature-positive climate action: How should we seek to ensure our global response to climate change also improves the resilience of our native ecosystems, and avoids harm to biodiversity?

Enter your answer here:

Whether domestically or globally the response to climate change needs to evaluate the before and after situation. For example, in New Zealand we need to ensure the net impact of land use decisions does not adversely effect native ecosystems or biodiversity. Given that land use change in NZ almost exclusively from extensive pastoralism this objective is typically satisfied.

Should New Zealand be pursuing other aims at COP not mentioned above? If so, what, and why?

Other aims:

How should we be looking ahead to the prospect of an Australian COP in 2026 to support New Zealand and Pacific interests? Should it affect how we participate in COP in the run up to 2026?

Australia COP:

## Section 2: How should New Zealand engage at COP?

What role do you think New Zealand should aim to play at COP? E.g. should we seek to be seen as a constructive bridge-builder, or be more prepared to be an outlier? Why?

Enter your answer here:

New Zealand has already spent enough time as an outlier given our challenging emissions profile evidenced by lack of progress in reducing emissions. New Zealand should seek to stay in the middle of the pack rather than trying to lead by example. The cost of our current commitments is already likely to be eyewatering.

Who should we be working and aligning with, and why?

Enter your answer here:

Is New Zealand part of the right initiatives and coalitions to achieve our COP objectives?

Not Answered

Why? Why not?:

What should we do differently?:

How should we give effect to our Treaty partnership with Māori in how we engage at COP?

Enter your answer here:

Who do you think should be represented at COP to drive the outcomes New Zealand seeks?

Enter your answer here:

## Mitigation Work Programme

What (e.g. sectors and measures) should this global mitigation work programme focus on, and how should it prioritise focus areas?

Enter your answer here:

Agriculture Forestry and Other Land Uses.

How should New Zealand engage in this programme to support global action?

Enter your answer here:

How should New Zealand engage in this programme to support domestic action?

Enter your answer here:

What relation, if any, should this have to New Zealand's Emissions Reduction Plan?

Enter your answer here:

Ideally there should be strong alignment between what New Zealand is advocating internationally and our domestic plan for achieving our targets.

The current lack of certainty around the role of mitigation in the Emissions Reduction Plan is not helpful to this alignment, particularly the role of offsetting.

## Nationally Determined Contributions

NDCs are nationally determined, however are there processes or elements it would be desirable for all countries to focus on in the preparation of their NDC2?

Enter your answer here:

How should this link to the need to urgently reduce emissions in this critical decade, i.e. pre-2030?

Enter your answer here:

Should New Zealand be advocating for the implementation of NDCs to also promote biodiversity benefits – and if so, how?

Yes

If yes, how?:

Recognition of biodiversity credits and capture of additionality.

## Agriculture

What outcomes would you like to see internationally in relation to agricultural climate action?

Enter your answer here:

How do you think Māori rights and interests in agriculture and the land sector should be advocated for at COP?

Enter your answer here:

Recognising New Zealand's domestic action to address agricultural emissions, should we be hard lined in negotiations by requiring text to recognise that all countries should be seeking to reduce their agricultural emissions?

Enter your answer here:

Yes. New Zealand represents one of the most globally efficient places to produce agricultural products. If we are expected to address our agricultural emissions then this should be a global norm. If this is not the case then other countries are effectively subsidising their agricultural emissions.

## Forestry

What outcomes would you like to see internationally in relation to forest climate action in the context of COP?

Enter your answer here:

New Zealand should refrain from ambitious additional commitments. Our emissions profile much more closely resembles that of a developing country (dominated by agriculture) than it does an Annex 2 country. Notwithstanding the progress that New Zealand needs to make on reducing gross emissions, our reliance that transition being assisted by offsetting from forestry remains critical given the challenging target we have set ourselves and the limited options available. Without this assistance the financial cost to New Zealand may well be unsustainable. It is important that New Zealand continues to advocate for forests and offsetting while also supporting that this needs to be done in a way that is sustainable and does not undermine progress on emissions reduction.

Where do you think New Zealand can provide global leadership on forestry in the context of COP?

Enter your answer here:

New Zealand provides a very good model of how a limited land area, operated under independently audited certification criteria, can deliver a much needed contribution to biomaterials and the bio-economy without compromising biodiversity, food production or employment. The use of the ETS and the development of the National Environmental Standards for Plantation Forestry are examples New Zealand can use to demonstrate its commitment to forest management leadership.

The COP26 Glasgow Leaders Declaration is being built on and is appropriately supported by New Zealand. It would have been useful if New Zealand had been more involved in this in COP27, like Australia, but there is an opportunity to continue to show support at COP28.

What do you think New Zealand's position should be on the role of forests for climate change mitigation, including within NDCs and the international purchase of forest carbon credits?

Enter your answer here:

As noted above New Zealand is critically reliant on forestry for mitigation and the delegation should continue to strongly support this as a legitimate tool. The ETS has been instrumental in achieving an increase in forestry and international fungibility of units would allow international least cost abatement and should also be supported, particularly as New Zealand is almost certainly going to require international forestry units.

What do you think New Zealand's position at the COP negotiations should be on the role of forests for climate change adaptation, such as through nature-based solutions?

Enter your answer here:

All options that contribute to achieving an increasingly difficult target should be supported. In parts of the world forestry is being expanded at the expense of existing ecosystems, including old growth forests. This is causing understandable concern but should not translate into a concern that afforestation should be constrained. Forestry's role, not just in mitigation but also in delivering a sustainable supply of renewable materials and energy, remains vital and continues to be under-appreciated. A major concern shared by members of the International Council of Forest and Paper Association is the increasing gap between projected demand for fibre and projections of supply. The International Forestry Council will be focused on this at COP28. New Zealand should continue to work with like-minded countries, such as Australia, in promoting the role of forests but also wood products.

How do you think Māori rights and interests in forestry and the land sector should be advocated for at COP?

Enter your answer here:

There is a strong agreement between the long-term investment horizons associated with forestry and the intergenerational commitments and aspirations of Maori. It is important to acknowledge the dependency of Maori on forestry as a development option for their land when in many areas, there are no other options. The ETS and carbon, as well as helping New Zealand transition to a low carbon bio-economy, are also providing an opportunity for Maori to unlock land that has remained undeveloped and to enable such landowner's to transition to contemplate a viable sustainable future for their people. Much forest land elsewhere in the world is public land. It is important to advocate for private landowner flexibility and recognition especially where behaviour change and land use is desired.

## International Cooperation on Mitigation

How should New Zealand promote environmental integrity and ensuring that only real and additional emissions reductions and removals can be used towards NDCs?

Enter your answer here:

New Zealand has strong credentials for monitoring and measuring additionality. An example of this is the sophistication of our Emissions Trading Scheme (ETS). It is reasonable for New Zealand to request the same rigor from other countries, particularly if we are moving towards internationally recognised and linked actions.

How should New Zealand promote environmental integrity and ensuring that only real and additional emissions reductions and removals can be used towards NDCs?

Enter your answer here:

How should New Zealand ensure that sustainable development co-benefits (such as where funding mitigation outcomes also improves access to affordable energy for communities in the developing country partner) are mandated or weighted appropriately?

Enter your answer here:

What should New Zealand prioritise when engaging in the negotiations to support our access to sources of emissions reduction units with high environmental integrity?

Enter your answer here:

Independently audited, internationally recognised standards.

## Biodiversity and Nature-Based Solutions

What outcomes would you like to see internationally in relation to Nature-Based Solutions?

Enter your answer here:

Recognition of the biodiversity value of both old growth indigenous trees and a mosaiced landscape including both native trees and planted forests.

Are there specific environmental or social safeguards, which New Zealand should be pursuing internationally? If yes, how?

Enter your answer here:

New Zealand should be aligning to Taskforce for Nature based Financial Disclosure reporting.

How can countries be encouraged to promote biodiversity benefits, and minimise risks of negative impacts on biodiversity from climate action?

Enter your answer here:

Carbon credits to promote establishment of native forest and biodiversity.

Are there insights New Zealand can bring to the international climate-biodiversity nexus from te ao Māori and a kaupapa Māori perspective?

Enter your answer here:

What else should New Zealand be doing internationally to promote more integrated global climate and biodiversity action?

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