

New Zealand's second emissions reduction plan

Templated consultation questions

How to use this document

The Ministry for the Environment has developed this template to support individuals and organisations that would like to gather collective input before making a submission on the second emissions reduction plan proposals

This template uses the consultation questions from the online submission portal.

Using the template

- Please follow the structure of the questions.
- There are five required questions in the 'Submitter details' section
- There are four required questions in the 'Privacy statement and consent' section.
- All other questions are optional, and you can answer as many or as few as you would like.

More information about consultation proposals can be found on the MfE website: [Help Shape Our Climate Future: Consultation on New Zealand's Second Emissions Reduction Plan now open](#) | [Ministry for the Environment](#)

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Submitter details

	Question (all required)	Response
1	Submitter name <i>Individual or organisation name</i>	BRANZ (Building Research Association of New Zealand)
2	What is your contact email address? <i>You will receive an acknowledgement email when you submit your response</i>	[]
3	Are you submitting as an individual or on behalf of an organisation?	<ul style="list-style-type: none"> <input type="checkbox"/> Individual <input checked="" type="checkbox"/> Organisation: Name: BRANZ
4	Which region are you in?	Please choose one: <ul style="list-style-type: none"> <input type="checkbox"/> Outside of New Zealand <input type="checkbox"/> Not applicable – national organisation <input type="checkbox"/> Northland / Te Tai Tokerau <input type="checkbox"/> Auckland / Tāmaki Makaurau <input type="checkbox"/> Waikato <input type="checkbox"/> Bay of Plenty / Te Moana-a-Toi <input type="checkbox"/> Gisborne / Te Tairāwhiti <input type="checkbox"/> Hawke’s Bay / Te Matau-a-Māui <input type="checkbox"/> Taranaki <input type="checkbox"/> Manawatū-Whanganui <input checked="" type="checkbox"/> Wellington / Te Whanganui-a-Tara <input type="checkbox"/> Tasman / Te Tai-o-Aorere <input type="checkbox"/> Nelson / Whakatū <input type="checkbox"/> Marlborough / Te Taihū-o-te-waka <input type="checkbox"/> West Coast / Te Tai Poutini <input type="checkbox"/> Canterbury / Waitaha <input type="checkbox"/> Otago / Ōtākou <input type="checkbox"/> Southland / Murihiku
5	Please choose any you are associated with	<ul style="list-style-type: none"> <input type="checkbox"/> Iwi/Hapū <input type="checkbox"/> Local/regional government <input type="checkbox"/> Energy industry/Sector body/Business <input type="checkbox"/> Transport industry/Sector body/Business <input type="checkbox"/> Agriculture industry/Sector body/Business <input type="checkbox"/> Forestry industry/Sector body/Business <input type="checkbox"/> Non-Forestry industry/Sector body/Business <input type="checkbox"/> Waste industry/Sector body/Business <input checked="" type="checkbox"/> Other industry/Sector body/Business <input type="checkbox"/> ETS market participant <input type="checkbox"/> Environmental NGO <input type="checkbox"/> Other kind of NGO or charity <input checked="" type="checkbox"/> Other: please specify: Building & construction sector independent research organisation

Preface – About BRANZ

The Building Research Association of New Zealand (BRANZ) welcomes the opportunity to provide feedback to the Ministry for the Environment on New Zealand's Second Emissions Reduction Plan (2026-2030) (ERP2). Please note that we have only responded to the general consultation questions 1-5 and question 8.3, as well as providing this document.

We acknowledge the Government's proposal to meet New Zealand's targets to reduce the impacts of climate change and prepare for its future effects, including the five priority pillars outlined to inform the ERP2:

1. Infrastructure is resilient and communities are well prepared.
2. Credible markets support the climate transition.
3. Clean energy is abundant and affordable.
4. World-leading climate innovation is boosting the economy.
5. Nature-based solutions address climate change.

BRANZ's primary role is as an independent science and research organisation. BRANZ is the only national research institution focused exclusively on the wider building and construction sector.

Our current investment priorities for new research are in four main areas:

- Improving housing affordability for all New Zealanders,
- Improving the quality of Aotearoa New Zealand's building stock,
- Resilience of buildings to natural hazards, and
- Improving environmental sustainability and circularity of the built environment.

Specifically, for over 20 years BRANZ has contributed to research about climate change and its impacts. BRANZ established the *Transition to a zero-carbon built environment research programme*¹ in 2019 to support an industry-led transition to reducing emissions. The programme aims to provide the science, knowledge and guidance on how we can cost-effectively decarbonise new and existing buildings and building stock in Aotearoa New Zealand. The programme provides resources such as research, tools and calculators, and collaborates with decision makers and industry to encourage action to help manage climate change mitigation.

We are open to working with the Ministry for the Environment on exploring ways our research programmes, priorities and outputs can help reduce the impacts of climate change and the country's emissions.

Alongside research, BRANZ offers commercial, independent, science-based testing and assurance services. BRANZ has over 50 years of expertise in assessing products entering the

¹ See <https://www.branz.co.nz/environment-zero-carbon-research/transition/>

market. Our assurance services give confidence to product suppliers (who choose to use them) that their materials should perform to the New Zealand Building Code (the Building Code) and associated regulations and standards, if properly used and/or installed.

Summary of BRANZ response

BRANZ notes the proposed shift from the first ERP's focus on gross emissions reductions, to the focus on net emissions reductions in the ERP2.

Several consequences of this shift can be seen in the ERP2, such as:

- significant upfront gross emissions from key policies,
- a reliance on offsetting of emissions,
- a reliance on technological optimism and speculation (e.g. carbon capture, utilisation, and storage (CCUS) plans),
- missed opportunities from supporting circularity and circular economies,
- a lack of incentivising and behaviour change actions.

In its second Emissions Reduction Plan (ERP2), the Government has shifted from a focus on gross emissions reductions to a proposed net-based approach that relies on both emissions reductions and removals. BRANZ is concerned that this approach may not be sufficient to achieve the 2050 net zero target and may have negative consequences for the building and construction sector, which accounts for 20% of overall carbon emissions in New Zealand².

The net-based approach in ERP2 implies a reliance on offsetting emissions through forestry and other land use changes, rather than incentivising the reduction of emissions at the source. It also assumes that technological solutions, such as carbon capture, utilisation, and storage (CCUS), will be available and effective in the near future, which is highly uncertain. Furthermore, the net-based approach misses the opportunities to support circularity and circular economies, which can reduce waste, emissions and resource use across the whole lifecycle of buildings and products. Finally, the net-based approach does not address the need for behaviour change actions that can help consumers, businesses and communities to adopt low-emissions lifestyles and practices.

BRANZ also notes that the building and construction sector is not considered in ERP2, despite being a significant contributor to emissions and having a potential to reduce them through various measures. These measures include the introduction of Energy Performance Certificates, which can provide information and incentives for improving the energy efficiency of buildings; building retrofits, which can enhance the thermal performance and comfort of existing buildings; and energy efficiency measures, which can reduce the energy demand and emissions from heating, cooling, lighting and appliances.

BRANZ urges the Government to reconsider excluding the building and construction sector in its emissions reduction plan. BRANZ believes that this sector can play a vital role in achieving the 2050 net zero target and creating a low-emissions economy for New Zealand.

² Vickers, J. & Fisher, B. (2018). *The carbon footprint of New Zealand's built environment: Hotspot or not?* Wellington: thinkstep-anz. <https://www.thinkstep-anz.com/resrc/reports/the-carbon-footprint-of-new-zealands-built-environment/>

General consultation questions

The following consultation questions relate to the Government's general approach to emissions reductions. Some information is provided along with these questions to support you to answer them without extensive reading of the discussion document.

Share your views	
0.1	<p>What do you think is working well in New Zealand to reduce our emissions and achieve the 2050 net zero target?</p> <p>Collaboration within the building and construction sector. For example, the partnership between BRANZ and Construction Information Ltd (CIL, better known by the brand Masterspec) to develop a free, accessible national online resource for BRANZ's carbon data on construction materials and products.</p>
0.2	<p>The Government is taking a 'net-based approach' that uses both emissions reductions and removals to reduce overall emissions in the atmosphere (rather than an approach that focuses only on reducing emissions at the source). A net-based approach is helpful for managing emissions in a cost-effective way that helps grow the economy and increase productivity in New Zealand.</p> <p>a. What do you see as the key advantages of taking a net-based approach?</p> <p>b. What do you see as the key challenges to taking a net-based approach?</p> <p>b. A major challenge to taking a net-based approach is that upfront emissions continue and have a compounding effect on future emissions increases. This effectively pushes responsibility for these upfront emissions into the future. The net-based approach relies on offsetting emissions and on technological optimism and speculation, for example a reliance on carbon capture, utilisation, and storage (CCUS) plans. This has the effect of deprioritising support for circular economy opportunities, incentivising tactics and behaviour change actions.</p>
0.3	<p>The current proposed policies in the ERP2 discussion document cover the following sectors and areas:</p> <ul style="list-style-type: none"> strengthening the New Zealand Emissions Trading Scheme private investment in climate change energy sector transport sector agriculture sector forestry and wood-processing sector non-forestry removals waste sector. <p>What, if any, other sectors or areas do you think have significant opportunities for cost-effective emissions reduction?</p> <p>The building and construction sector. For example, the residential construction industry has a crucial role to play in contributing to the 2050 goal as described in BRANZ study report: Jaques, R. & Bullen, L. (2023) Housing stock strategies responding to New Zealand's 2050 carbon target. Study Report SR478. BRANZ Ltd. This report describes cost-effective and relatively simple actions that can be taken to reduce emissions, such as (ibid, page 1) Encourage/incentivise switch to heat pumps for both space and water heating with very low or zero GWP refrigerants. • Implement requirements for limits on embodied carbon and design for low operational energy use in new builds as soon as possible. • Restrict use of gas in new builds. • Encourage/incentivise the construction of smaller, high-performance houses. • Implement measures to minimise waste during construction. • Encourage/incentivise replacement of household appliances at end of life with the most-efficient options. BRANZ is supportive of greater energy efficiency within the ERP2, however we note that the focus is on microgeneration through the use of Photovoltaic systems and batteries. We recommend a greater priority be placed on adopting Energy Performance Certificates (EPC) for buildings. EPCs help to create transparency around residential thermal performance and therefore the associated costs. EPCs also help shift the housing market to be more thermally comfortable and climate-friendly. We</p>

Share your views

	recommended the Government adopt the Building for Climate Change amendments to the Building Act 2004 that were proposed in 2022. Those amendments suggest that EPCs be adopted for new and existing commercial, public, industrial and large-scale residential buildings. We recommend the adoption of EPCs goes wider, to include new and existing standalone, attached and medium density buildings. We suggest that New Zealand adopts the Australia's National Scorecard EPC (adapted to the New Zealand environment and conditions). By adopting EPCs for buildings, we will improve building performance by removing highly inefficient building stock.
0.4	<p>What Māori- and iwi-led action to reduce emissions could benefit from government support?</p> <p>There are additional questions about Māori- and iwi-led action to reduce emissions and impacts of proposed ERP2 policies on Māori and iwi in chapters 1 and 12.</p>
	Click or tap here to enter text.

Chapter 8: Forestry and wood processing | Te ahumahi ngāherehere me te tukatuka rākau

8.3	How large should the role of wood in the built environment play in New Zealand's climate response?
	<ul style="list-style-type: none"><input type="checkbox"/> Less than currently<input type="checkbox"/> About the same as currently<input checked="" type="checkbox"/> More than currently<input type="checkbox"/> Unsure