



Emissions Reduction Plan

Local Government New Zealand's submission on *Te hau mārohi ki anamata* –
Transitioning to a low-emissions and climate-resilient future

November 2021

We are. LGNZ.

LGNZ is the national organisation of local authorities in New Zealand and 77 of New Zealand's councils are members. We represent the national interests of councils and promote the good governance of councils and communities. LGNZ provides advocacy and policy services, business support, advice and training to our members to assist them to build successful communities. Our purpose is to be *local democracy's vision and voice* and our vision is *to create the most active and inclusive democracy in the world*.

Introduction

Local Government New Zealand (LGNZ) thanks the Ministry for the Environment (MfE) for the opportunity to have input into the development of Aotearoa New Zealand's first Emissions Reduction Plan (ERP).

This submission provides general comments and feedback on a number of the matters raised in MfE's consultation document, Te hau mārohi ki anamata – Transitioning to a low-emissions and climate resilient future.

This submission has been developed with input from the Council Climate Network – a network of council officers from across the motu (country) who are committed to working together to prepare their communities for climate change by sharing best practice and knowledge across the local government sector. A number of councils have also had input into this submission.

Climate change is a significant issue for local government. Councils and their communities are already taking action to mitigate and adapt to the impacts of climate change – and are committed to doing more. This submission sets out a number of suggestions for how central government can better partner with and support councils and their communities to address climate change. This is critical given that the impacts of climate change – and the impacts of transitioning to carbon zero – will be felt locally.

LGNZ acknowledges the significant amount of reform that is underway, coupled with the pressure of the ongoing response to the COVID-19 pandemic. However, climate change poses the biggest long-term challenge (and opportunity) to Aotearoa New Zealand's communities. This means that work to mitigate and adapt to the impacts of climate change must be prioritised by the Government as a matter of urgency. We urge the Government to ensure that publication of the first Emissions Reduction Plan is not delayed any further.

Climate Change Commission's advice

LGNZ notes that it isn't clear from the consultation document how the comprehensive Final Advice of the Climate Change Commission has or hasn't been accepted. It would be useful to understand the Government's rationale for accepting or rejecting proposals that were put forward by the Climate Change Commission.

Local government's role

Central and local government partnership to mitigate climate change

Although the ERP is a national-level plan, local government will play a significant role in Aotearoa New Zealand's transition to carbon zero. A considerable amount of the action needed to reduce emissions will be carried out and have implications at the local level. Many of the actions outlined in the consultation document will be delivered, supported or enabled by local government.

While the consultation document identifies that local government and communities will need to be empowered to support meeting carbon zero goals, we are concerned that this isn't well-reflected throughout the range of options that are identified for supporting the transition to carbon zero. There is little reference throughout the consultation document to the role that local government can and will play, and the support, tools, resources and funding it needs to meaningfully contribute to the Government's emissions reduction goals.

To support necessary action at the local level, the Government should partner – and not just collaborate – with local government. The Heads of Agreement recently entered into between the Crown and LGNZ commits the Crown to extending the partnership-based approach outlined in the agreement to other areas of reform that significantly impact local government.

The ERP consultation document doesn't reflect the need for partnership with local government as strongly as the Climate Change Commission's Final Advice did. For example, the consultation document doesn't include in its suite of options the Commission's recommendation that by June 2022 the Government publishes an agreement that sets out the mechanism for achieving necessary alignment between central and local government, and by December 2022 publishes a work plan outlining how alignment and funding will be addressed, with milestones for achieving the plan.

We strongly recommend that the final ERP includes these two actions – and that the agreement and plan be developed in partnership with local government.

Working in partnership with local government will help the Government to:

- Understand the level at which various policy levers are best applied – locally, regionally or nationally.
- Drive and influence behaviour change by communities. Local government's proximity to communities means it's well-placed to advise on how necessary behaviour change can be encouraged and supported.
- Understand some of the inequities communities may face as a result of the transition, and how they can be supported through it.

Tools, guidance and resources

Local government has indicated to the Government for a number of years now that it would benefit from access to a range of tools, guidance and resources to support it (and its communities) to contribute to emissions reductions, including:

- Consistent tools for measuring, forecasting and reporting on emissions.
- Guidance on how to set emissions reduction targets for districts/regions that are aligned with national targets.
- Guidance on regulatory levers that already exist for councils to reduce emissions in their jurisdictions.
- Consistent frameworks for undertaking climate change governance assessments.
- Guidance on how to factor climate change considerations into business cases and investment decisions.
- Best practice guidance on behaviour change and communication approaches.

Any tools, guidance and resources for local government should be developed in partnership with councils to ensure that they are workable, practical and cost-effective.

LGNZ and Taituarā – Local Government Professionals Aotearoa are well-placed, as the peak local government sector bodies, to support central government with this mahi. We encourage the Government to partner with us to develop a suite of guidance, resources and tools to support climate change mitigation (and adaptation) action by councils, and to act as conduits between central government agencies and councils. LGNZ and Taituarā can help connect central government agencies with councils who can pilot or support the delivery of particular initiatives to contribute to emissions reductions.

Local government's roles and responsibilities

Councils have indicated to LGNZ (and the Government) for several years now that they would benefit from clearer guidance on the role local government is expected to play in reducing emissions. For example, to what extent will councils be responsible for abating emissions generated by land use change and transport? Will councils be expected to plan, incentivise, and fund changes to infrastructure to achieve emissions reductions? Will councils be required to produce emissions reduction plans?

Notwithstanding the need for central and local government to work together, what that working relationship looks like needs to be clearly defined – by clearly allocating roles and responsibilities. Without this, there is a risk that each party will do nothing while expecting the other to act.

Local government would also benefit from an understanding of central government's expectations on how emission reductions will be regionally distributed. For example, will Wellington and Southland both be expected to reduce carbon emissions or vehicle kilometres travelled at the same rate, or will this differ based on the relative concentration of factors such as urban density and emissions from agriculture?

National direction

Much stronger national direction will be needed to achieve the Government's proposed emissions reduction targets. To achieve the Government's emissions reduction goals we need every local authority and community moving in a unified direction, at pace, starting as soon as possible. It seems very unlikely that this will happen across 78 separate local authorities without direction from central government.

This could involve central government providing clearer direction to local authorities about the need for, and consistent approaches to developing:

- Regional emissions reduction targets
- Regional vehicle kilometres travelled (VKT) reduction targets
- Regional emissions reduction plans
- Required levels of service for public transport and active transport infrastructure

National direction should be developed in partnership with local government and should adequately provide for regional differences – while driving unified progress, at pace.

Local government funding

The Climate Change Commission warned in its Final Advice that cost pressures are likely to grow as councils respond to climate change and expressed a view that local authorities would need central government funding to manage the transition. The Future for Local Government Review Panel has also identified funding climate change action as a significant challenge for local government.

Local government has raised repeatedly the need for funding to be made available to councils to support mitigation action with and by their communities. Earlier this year a number of local government representatives attended MfE-led workshops on the ERP and strongly supported the establishment of a national fund to support local mitigation action. These local government representatives identified a number of factors for the Government to feed into the design of such a fund, including:

- Adequacy of funding is important, but it's also important funding is allocated for appropriate timeframes – including to enable delivery of initiatives.
- The need to balance avoiding a funding 'lolly scramble', while recognising that contestable funding doesn't provide councils with predictability – which is critical to planning.
- Funding allocations should reflect the different starting points that councils and communities will be at.
- A suggestion that a base amount of funding be provided to each council, with contestable top ups available for good business cases.
- The need to strike the right balance between funding for national priorities carried out locally versus local priorities.
- Prioritising projects that will generate the most emissions reductions, or support equitable

transition outcomes for the most vulnerable communities.

We will wait with interest to see what specific recommendations the Future for Local Government Review Panel makes around changes needed to funding and financing to enable councils to mitigate and adapt to the impacts of climate change. In the meantime, we encourage the Government to continue to ensure its various work programmes are aligned, and to engage with LGNZ and councils on developing solutions to this important issue.

Aotearoa New Zealand's pathway to carbon zero

Vision, purpose and targets

LGNZ broadly agrees with the Government's proposed pathway to carbon zero and agrees that a comprehensive, multi-sector strategy will help us to move towards the 2050 target and improve broader wellbeing.

However, LGNZ is concerned that the consultation document doesn't yet include a comprehensive range of multi-sector options for addressing the issues and opportunities that exist. So far it appears that there is only a comprehensive range of options for reducing emissions from transport.

LGNZ is also concerned that the consultation document lacks detail on how each of the options identified for reducing emissions would be delivered – including by whom. Local government is prepared to work with the Government to identify the role it can play in progressing preferred options, and the support that local government will need to do that.

Our ultimate concern is the need for substantially greater investment by the Government to ensure Aotearoa New Zealand meets its carbon zero goals. We are concerned that the consultation document fails to identify how each of the actions it suggests will be funded. This must be addressed as a matter of priority. The Government will need to invest heavily in transformations that significantly reduce emissions and ensure that these are delivered. Otherwise there is a risk that investment will be spread too thin and that action will lack impact.

While LGNZ acknowledges the need for a range of policy tools to support emissions reductions, any new policy needs to complement the New Zealand Emissions Trading Scheme (ETS). Market-based rules are more likely to drive the real change that is needed, as opposed to rules-based approaches which can be changed at the whim of politics.

Finally, LGNZ also encourages the Government to better reflect in its proposed vision the need for resilient communities, given the interrelationship between climate change mitigation and adaptation.

Aligning the transition to carbon zero with other priorities

It is critical that work on the ERP aligns with other related central government led reform and policy work programmes, including the reform of the resource management system, Three Waters reform, the review into the Future for Local Government, the National Policy Statements for Urban Development and Freshwater Management and development of the National Adaptation Plan, to name but a few.

We make some specific suggestions on areas where the Government needs to ensure there is alignment throughout this submission.

LGNZ's view is that it's vital that work to reduce emissions aligns with work to build communities' resilience to the impacts of climate change – particularly given that these impacts are being felt by communities now. For this reason, we welcome the work that we understand the Government is doing to think about how revenues from the ETS can be recycled and allocated to adaptation action. These revenues could also be used to support a just transition for Aotearoa New Zealand's communities to carbon zero.

We encourage the Government to continue this work, and to think about the institutional arrangements that could be put in place to ensure that ETS revenues are allocated towards these purposes – and are safeguarded from being allocated to other priorities. We encourage the Government to align this thinking with the work we understand it is doing around the design of a national adaptation fund, as part of its work on the proposed Climate Change Adaptation Act.

Principles for transition

LGNZ agrees that a just transition is critical and broadly supports the principles for transition that are identified in the consultation document.

As noted above, local government's proximity to its communities means it is well-placed to support the Government to understand the impacts the policy decisions it makes will have on communities, and how communities can be supported through the transition.

We support the inclusion of the principle that the Government's decisions be guided by an evidence-based approach. However, we are concerned that a number of the proposals in the consultation document haven't yet been quantified. The document itself identifies that a number of proposals need further assessment for effectiveness, value for money and implications for other Government priorities. This suggests that the Government will need to build its capability and capacity in respect of taking an evidence-based approach to climate change policy making going forward.

We recommend that the Government includes a principle that specifically addresses the need to identify the appropriate scale at which action is taken – whether that be local, regional or national. There must be consideration of how national policy trickles down into local action, and what the implications of national-level decisions are for local and regional communities.

We also recommend that the Government includes a principle on working in partnership with local government, including by making decisions that are guided by local perspectives, aspirations and objectives. This will help the Government to ensure that urban and rural communities are empowered to transition in line with local objectives and aspirations – which the consultation

document identifies as one of the Government's goals.

We also recommend that the Government adopts a principle that any new policy to achieve carbon zero is supported with appropriate national level funding, and an analysis of the funding that will be required at regional and local levels to support implementation.

Working with Te Tiriti partners

Māori have considerable indigenous knowledge of ways of doing things to protect, enhance and restore the natural environment, and living without use of fossil fuels, that Aotearoa New Zealand can learn from. LGNZ strongly encourages the Government to support Māori to share that knowledge so it can be considered in forming our unique cultural response to the climate crisis.

Further, we agree that it is critical that the Government understands how the changes it is proposing will affect iwi/Māori. Local government's proximity to, and pre-existing relationships with iwi and hapū mean it is well-placed to support the Government with this. We encourage the Government to work in partnership with local government to support its work with Treaty partners at the local level.

We agree that iwi/Māori will need financial support from the Government to build their capability and capacity to contribute to Aotearoa New Zealand's transition to carbon zero. As the Treaty partner, the Crown should also support local government to build its capability and capacity to work closely with iwi/Māori on climate change mitigation action.

For example, we note that the consultation document recommends that the Government supports iwi/Māori to develop emissions profiles. While we support this, the Government could support iwi/Māori and local government to develop emissions profiles in partnership. This would enable iwi/Māori and local government to draw on their respective capabilities and knowledge and avoid unnecessary duplication of work at the local level – particularly given the significant amount of change and reform that both iwi/Māori and local government are currently grappling with.

Aligning systems and tools

LGNZ agrees that aligning systems and tools will be critical to achieving the Government's carbon zero goals. Below are a number of suggestions for areas where alignment will be critical, and ways the Government can achieve alignment:

- LGNZ agrees that reforming the resource management system presents an opportunity to better support councils and communities to contribute to emissions reductions through resource allocation and land use planning decisions. We make further comments on the role of planning in enabling emissions reductions below. If the Government is to achieve its objective of better mitigating emissions contributing to climate change through the reform of the resource management system, it will need to continue to partner closely with local government. We are pleased that the Government has established a Local Government Resource Management Reform Steering Group to support this. Ongoing

engagement with the sector more broadly will also be critical.

- LGNZ agrees that behaviour change will be critical to achieving New Zealand’s emissions reduction goals. While individual behaviour change will be important, most of the change that is needed is systemic change that will need to be driven by the Government and large organisations with sufficient reach and economies of scale. An interdepartmental board of Chief Executives, as provided for under the Public Service Act, could help to ensure that there is strategic oversight across the system.
- Introducing Vote Climate Change (as recommended by the Climate Change Commission in its Final Advice) is one way that the Government could ensure there is coordination of, and accountability for, its work programmes.
- As noted above, the Government needs to do considerably more work to identify how the actions it will take to reduce emissions will be funded. This must align with the work that the Future for Local Government Review Panel is doing to look at funding and financing options for local government – particularly given that the Panel’s Interim Report identifies funding climate change action as a significant challenge for local government.
- We agree that there is a need to build central government capability and capacity in the climate change mitigation space. The same is true for local government. We encourage the Government to work closely with the tertiary sector, LGNZ, Taituarā and other member bodies (such as the New Zealand Planning Institute) to develop a comprehensive plan to support this.
- Coordinated central government consultations with local government, iwi/Māori, the private sector and communities would be helpful. Throughout 2021 alone we’ve seen several consultations on various work programmes that have emissions reduction focused goals, including consultations on the Transport Emissions Reduction Plan, the Infrastructure Strategy and updates to the Building Code, to name but a few. It is critical that all these work programmes are aligning – and ultimately align with the final ERP. Inconsistencies across programmes will be unhelpful and difficult for councils to reconcile.
- A joined-up approach by central government agencies will be critical for achieving New Zealand’s carbon zero goals, but cross-party support is equally critical. This will help to ensure that the ERP is enduring. However, we add the caveat that a lack of cross-party support shouldn’t defer the critical action on climate mitigation that is needed, now.
- More regular communications updates from the Government would help communities to understand progress on emissions reduction goals, and provide a means for communities to hold the Government to account on its progress. Real-time or frequently updated visual data, that is easy to understand and accessible, showing shifts towards achieving a successful transition would help both with accountability, and empowering all sectors of the community to see where progress is at and to make contributions.

Planning

LGNZ agrees that planning decisions can help drive emissions reductions. LGNZ also welcomes the Government's objective of reforming the resource management system to, in part, better mitigate the emissions that contribute to climate change.

If the Government is to achieve that objective, it will be critical that the ERP aligns with the proposed new National Planning Framework. That should include providing clear direction on how emissions reductions can be achieved through planning decisions. In addition to direction, the Government will need to work with councils and communities to develop tools that support integrating consideration of emissions into planning decisions.

The new planning system will also need to provide clear direction on how trade-offs should be managed. The exposure draft of the Natural and Built Environments Act sets out 18 unprioritised outcomes for the natural and built environments – many of which are competing. While we acknowledge the inevitability of some competition between outcomes for the natural and built environments, clear guidance in the Act itself, or the National Planning Framework, on how trade-offs should be managed will be critical – particularly if the Government wants to meet its carbon zero goals.

We understand the Government is proposing to introduce a requirement for regions to prepare regional spatial strategies (RSSs) under the Strategic Planning Act. The RSSs are proposed to be long-term in focus (30 years) and identify areas that are suitable for development, need to be protected, require infrastructure and/or are vulnerable to climate change effects and natural hazards. RSSs will integrate with the Local Government Act 2002 and Land Transport Management Act 2003.

We understand the Government's current thinking is that RSSs will not be operative, but rather will guide NBA plans and coordinate investment from the public and private sector. We also understand that thought is being given to whether implementation agreements are a mechanism that could be used to commit partners to deliver investment. If RSSs are to actually deliver investments that contribute to emissions reductions, thought is going to need to be given to ways to secure their implementation. This may be particularly challenging if not all local authorities in a region are represented on the RSS joint committee. We encourage the Government to continue to work with local government on this.

There are some concerns within the local government sector that the scale of the reform proposed to the resource management system is so significant that, given capability and capacity constraints within the planning system, there is potential for the reform to not have the transformational impact the Government is hoping for. To ensure that the transition to the new system is successful and carefully planned – and doesn't result in unintended consequences – the Government will need to continue to work in close partnership with local government. We also encourage the Government to think about setting up a National Transition Unit to oversee and manage an effective transition to the new system.

LGNZ makes the following further points:

- Local government agrees that greater high to medium-density housing is a way to contribute to emissions reductions. However, local government needs significantly more funding and financing tools from the Government to support it to deliver the infrastructure that is needed to enable intensification of brownfields areas, and to deliver infrastructure projects that support zero carbon goals.
- Given strong signals we will head down a path of needing to factor emissions into planning decisions, councils and their communities will need consistent, easy to use tools that support them to do this. The development of these tools should be funded by central government, to ensure consistency and equity of access to them, but must be developed in partnership with local government.
- The tools that are developed to support the Government, councils and communities to understand the emissions associated with urban development decisions should incorporate the likely lifetime emissions of transport and energy use that would be enabled under different scenarios, and embodied emissions in buildings and infrastructure.
- The Government will also need to work with local government on the issue of how the costs of carrying out emissions assessments associated with urban developments and associated transport options are met.

Transport

It is apparent from the consultation document that this is the sector for which there is the most comprehensive range of options for reducing emissions. However, we reiterate our earlier comments about our concern at the lack of detail about how each of the options would be delivered, by whom, and how they would be funded.

LGNZ welcomed the Climate Change Commission's recommendation that the Government provides local government with greater support to reduce communities' reliance on cars, including through legislation, removing regulatory barriers, and providing increased and targeted funding. We also welcomed the Commission's recommendation that the Government works with local government to set targets and implement plans to substantially increase walking, cycling, public transport and shared transport by the end of 2022.

LGNZ agrees that the Government must partner with iwi/Māori to co-design and develop solutions to reduce transport emissions. However, it must do the same with local government – since councils play a critical role in planning, funding and delivering transport networks and options, and play a key role in integrating land-use, urban development and transport planning. The relationship with local government must be more than just strong collaboration: it needs to be a partnership. Solutions need to be co-designed and co-developed.

In respect of the various options set out for reducing emissions from transport, we make the following comments:

- Any review of Regional Land Transport Plans needs to be done in partnership with local government. Thought needs to be given how a review of these plans aligns with changes to other planning processes that are being worked through as part of the reform of the resource management system.
- Greater funding and funding/financing tools will be needed to support the development of infrastructure and transport options that support emissions reductions. For example, in our submission on the Climate Change Commission's Draft Advice we expressed support for more funding from the National Land Transport Fund to support public and active mobility.
- Local government would welcome financial support from the Government to make public transport cheaper, and in appropriate cases free – which we know a number of communities and community leaders are advocating for. Any review of the principles for planning and funding public transport, and review of the Public Transport Operating Model, needs to happen in partnership with local government. Any funding implications for councils of reducing public transport fares will need to be worked through.
- We agree in principle with the proposal to make changes to regulation to make it easier for local government to reallocate road and street space rapidly for public transport, walking, cycling and shared mobility in urban areas. The Government must work in partnership with local government to ensure that regulations designed don't deliver unintended consequences. Funding to support changes to and development of infrastructure will be critical.
- Any investigation of ways to raise revenue for transport in the future, including replacing the land transport funding system, needs to happen in partnership with local government.
- Price alone isn't going to generate the mode shifts that are needed. The public transport network also needs to be convenient for users. That's why integrated land use and transport planning is important. The proposed Strategic Planning Act could help with this. That's why it is critical that there is alignment between the ERP and the reform of the resource management system, and in particular the development of the National Planning Framework and consideration of the implications for emissions reduction goals of decisions made around implementation of RSSs.
- Mode-shift plans for urban areas need to be developed with councils. Although these plans will need to align across the motu, they will differ based on local and regional circumstances. Funding the delivery of these plans is going to be a critical issue – local government will likely need considerably more funding from central government.
- Development of a national EV infrastructure plan should include local government, given the need for implementation across the country.

Congestion pricing/road user charging

While LGNZ welcomes the recommendation around “enabling congestion pricing and investigate how we can use other pricing tools to reduce emissions” this recommendation lacks ambition. Road pricing tools should be enabled and not just investigated further. Local government has been calling for road user charging for some time now – including as far back as 1993 in a joint Local Government New Zealand/Automobile Association/Road Transport Forum submission on Land Transport Funding.

Road pricing appears only under serious consideration for Auckland – acknowledging there is some signalling in the consultation document that it could be looked at for Wellington. We encourage the Government to work closely with other metropolitan councils on introducing road pricing elsewhere.

The Taituarā submission on the ERP consultation document makes a number of points around road tolling. We endorse these points and agree that making tolling of new and existing roads easier should be explored. Section 46 of the Land Transport Management Act could be amended to permit tolling of existing road use subject to consultation with the public. We agree with Taituarā that tolling new and existing roads could be a useful intermediate step to full road pricing.

Buildings

In principle LGNZ is supportive of initiatives to reduce emissions from buildings – both operational and embodied emissions. However, the transition needs to be equitable and consistent with the Government’s objectives around housing availability and affordability.

The Government must ensure that the ERP aligns with the Building Code. That should include alignment with the proposed updates to the Building Code that MBIE has recently consulted on around energy efficiency in buildings. We support the Taituarā submission on these proposed changes. We encourage the Government to further explore whether additional changes could be made to the Building Code to lift the energy efficiency of new buildings.

Agriculture

There is broad acceptance within the local government sector that agricultural emissions need to reduce and that bringing agricultural emissions into the ETS is one way in which this could be achieved. However, the transition for rural and provincial communities needs to be carefully managed. This must include engaging early with rural and provincial communities on the changes needed. Local government can support this. It’s also important that the Government understands and carefully manages the cumulative effects that a raft of Government-led changes are having on rural and provincial communities.

Signalling that unavoidable pricing mechanisms are coming soon is one way that the Government could incentivise action by those in the agricultural sector before pricing kicks in. Re-establishing the Projects to Reduce Emissions Scheme, instead of offsetting using only forestry, is one way that

innovation could be encouraged across farming (and also other sectors).

While forestry can be used to both offset residual emissions in hard to abate sectors, and increase our international commitments, LGNZ's view is that gross emissions reductions across all sectors should be the first priority. Carbon forestry should not be seen as a way to avoid or delay moves to decarbonise the economy.

Increases in carbon prices and the ability to fully offset emissions through the ETS are influencing forestry investment decisions and subsequent land-use change. Unintended consequences of greater forestry planting will need to be carefully managed, so that they are not irreversibly locked in – including impacts on biosecurity, fire risk, rural community resilience, export revenues and employment.

LGNZ also recommends that the Government should find ways to incentivise planting of permanent indigenous forests, as these provide multiple benefits, can be delivered at scale and are more aligned to our climate and ecological emergency. A carbon price differential between pine and native forestry is one way the Government could incentivise more permanent native forests. There should be some limits on the scale of exotic plantations in areas where permanent native forests would be more desirable.

Waste

LGNZ broadly agrees with the consultation document's proposals around reducing emissions from waste. Partnering with local government on any initiatives to reduce emissions from waste is critical. We encourage the Government to work closely with the WasteMINZ Territorial Authorities Officers' Forum on progressing any options for reducing emissions from waste. This Forum is, for example, actively working on a standardised solution for kerbside collections across the country.

We also note that the Ministry is currently consulting on a proposed waste strategy and new waste legislation. This work must align with the ERP. Given multiple work programmes underway, care needs to be taken to ensure there are no inconsistencies between the proposed strategy and legislation and the ERP. Inconsistencies will create unnecessary complexity for local government.

Other points

LGNZ makes the following further points:

- We support the need for more investment in research, science and innovation. However, it is critical that this investment supports the development and roll-out of practical tools that will support councils and their communities to take action. The need for action, now, means we need more than just ongoing academic studies.
- More support needs to be provided to small and medium sized businesses to ensure that they are not left behind in getting to know their emissions profile and supporting New Zealand's transition to a low carbon economy – especially after the major stress that has been caused by the COVID-19 pandemic. Small and medium sized businesses influence New Zealand's culture significantly and will be critical to the transition.
- Local government has, for a number of years now, called for a national campaign to drive emissions reduction behaviour change – similar to national road safety and smoke free campaigns, for example. Such a campaign would need to drive positive change and align with local aspirations and objectives. Local government is well-placed to support the Government with the development of behaviour change campaigns.
- The Government should further explore how it can support councils to work directly with schools to demonstrate and encourage sustainable practice.
- In principle we support the establishment of a behavioural change fund. This fund should be accessible by local government, so it is able to support and drive behaviour change with local communities. However, what isn't clear and needs to be worked through is the mechanism by which income for the behaviour change fund is generated.