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26 March 2021



Climate Change Commission Report

The New Zealand Association for Impact Assessment (NZAIA) thanks the Climate Change Commission for the opportunity to submit on the 2021 Draft Advice Report, on emission budgets.

About the New Zealand Association for Impact Assessment (NZAIA)

The NZAIA is a community of impact assessment specialists and supporters. Our membership comprises 80–100 practitioners of many kinds; academics, researchers and students, and other assorted professionals and interested parties. Our members include many of the leading IA experts in NZ, with longstanding reputations and a wealth of New Zealand, Pacific and international experience. We all share a deep interest in impact assessment, a decision-support method that is one of the most important tools we have for safeguarding the environment, and the people and communities who rely on it.

NZAIA is an affiliate of the International Association for Impact Assessment (IAIA), a professional association with some 1700 members located across 120 countries. NZAIA is also partnered with the Environment Institute of Australia and New Zealand Inc. (EIANZ); and the Secretariat of the Pacific Regional Environment Programme (SPREP).

Submission

NZAIA commends the CCC for producing such a thoughtful and valuable report in such a short (and disrupted) time. We also commend the Commission for the commitment to an inclusive process, to equitable outcomes from the transition process, and to giving effect to the Treaty of Waitangi.

Broad comments

The Commission's advice report places a great deal of stress on recognising the impacts of emission reduction budgets and strategies, as part of the concern for equitable outcomes. However, the treatment of impacts is seen very much through the economic lens, and includes impacts on GDP, on market share, on the wellbeing of businesses of various kinds, and especially on employment. We accept this needs to be the starting point of the analyses, for sound policy reasons. However, in our view there are deficiencies in the further consideration of impacts, especially in the social area.

Impact assessment, the field that NZAIA represents and promotes, involves systematic methodologies for scoping, impact identification and assessment, and the evaluation of significance, across all sectors of the environment (using the RMA definition): biophysical, social, health, culture, etc. Unlike the economic modelling approaches used in the report, no explanation is provided of the methodologies employed to identify and characterise the impacts discussed in the report. Although environmental (i.e. physical and ecological) impacts are discussed in chapter 5 of the advice report, there is no sense of a coherent approach being used to identify

potential impacts; rather the impression is of a literature review of recent scientific reports. Similar comments can be made about the health impacts that are mentioned quite often, but are never integrated into a wider framework of impacts, linking across social, cultural, and biophysical sectors.

But our major concern in the advice report is with social impacts. In the 1980s, the major changes that took place in government structures and operations created enormous changes across the country, and especially in regional and rural New Zealand. The significance of the scale of the social impacts of those changes was recognised by the setting up of a Royal Commission on Social Policy, which recommended, among other things, the vital importance of using social impact assessment as a policy appraisal tool.

The changes foreshadowed in this report, together with the changes to come through adaptation plans, will have significant social impacts throughout New Zealand, but especially in the regions and rural communities. Loss of employment is the first direct impact, but the breaking up of communities when people have to move to other places for work, the steady erosion of social and community services as demographics change, the increasing rate burden on smaller communities, increasing rates of anti-social behaviour, health impacts, and so forth - these are the flow on effects that have real consequences for the wider community.

In the 1980s, government was slow to respond to what were quite rapid and dramatic changes. This time, the changes will be slower, steadier, and perhaps less obvious, but they will be real and extensive, and government must be prepared to provide the necessary social support, to complement its efforts to train and upskill people and encourage employment in new industries. That means there needs to be a strong signal in this report that social impact assessment needs to be a recognised part of the policy and plan development processes in all relevant arms of government.

Comments related to specific recommendations

Given the nature of our Association, we will focus on those recommendations that concern process, rather than those dealing emission targets, and substantive mechanisms for reducing emissions, etc.

NZAIA supports the principles followed by the Commission in their analysis. We have a particular interest in Principle 5: Transition in an equitable and inclusive way. As our comments above have made clear, we feel the Commission's treatment of impacts (on people and communities) is too focused on direct economic impacts, and lacks sufficient attention to wider social impacts.

NZAIA supports Enabling recommendation 2: Coordinate efforts to address climate change across Government. However, we think there should also be a requirement that in developing plans, policies and strategies, the Government must incorporate strategic environmental assessment (SEA) in order appraise the potential wider implications for people, communities and the environment.

NZAIA supports Enabling recommendation 3: Genuine, active and enduring partnership with iwi/Māori, but recommends explicit encouragement of the use of cultural impact assessment by Maori communities to explore the wider implications of emission reducing pathways.

NZAIA supports Enabling recommendation 4: Central and local government working in partnership and Enabling recommendation 5: Establish processes for incorporating the views of all New Zealanders. With the latter, in addition to an ongoing public forum, we suggest a citizen

panel might also be worth considering, to provide a more considered response to specific proposals developed by the Commission as well as the Government.

NZAIA supports the Time-critical necessary action 1: *An equitable, inclusive and well-planned climate transition*. In particular we support the recommendation that Government produce an Equitable Transition Strategy. However, if that strategy is to anticipate and respond to the distributional impacts of climate change policy mechanisms effectively it must embed a systematic and coherent approach to identifying and characterising those impacts. And there should be recognition that social impacts go beyond loss of employment and its immediate economic consequences. For these reasons we strongly recommend the adoption of formal strategic assessment processes within the Equitable Transition Strategy process.

On behalf of the NZAIA

Emer. Prof. Richard Morgan