



23 August 2024

Ministry for the Environment
By email: ERPconsultation@mfe.govt.nz

Tēnā koutou

RE NEW ZEALAND'S SECOND EMISSIONS REDUCTION PLAN

Thank you for the opportunity to provide feedback on the Ministry for the Environment's consultation document on New Zealand's second emissions reduction plan (ERP). Engineering New Zealand (formerly IPENZ) is the largest professional body for engineers in New Zealand. We support over 23,000 engineers in shaping a better New Zealand. This submission reflects the views of Engineering New Zealand.

In forming this submission, we viewed the submissions of the Structural Engineering Society of New Zealand (SESOC – a collaborating technical society) and the New Zealand Green Building Council. We support the key messages of these groups, as outlined in their submissions.

Our response

Engineering New Zealand appreciates the Government's commitment to fulfilling New Zealand's climate change obligations, supporting collective action to reduce emissions. Engineers work across all sectors referenced in the ERP. For brevity, this submission focuses on two component parts of the ERP – (1) building and construction and (2) energy. It is our view that the draft ERP has significant omissions in these areas.

BUILDING AND CONSTRUCTION

ERP must include building and construction

The draft ERP does not address the impact of the built environment on greenhouse gas emissions. This is a significant omission. The built environment is responsible for approximately 20 per cent of New Zealand's carbon emissions. The draft ERP briefly expresses support for green building practices (page 57) but fails to outline any actionable steps. It is our view that there is a case for regulatory intervention.

Engineering New Zealand has long supported the Ministry of Business, Innovation and Employment's (MBIE) Building for Climate Change programme.¹ Recently we joined the Green Building Council and dozens of organisations, calling for a commitment from Government to implement the Building for Climate Change programme, as well as implement energy transparency

¹Engineering New Zealand's submission to MBIE's Building for Climate Change Programme.
https://www.engineeringnz.org/documents/663/Submission_BuildingForClimateChange_October_2020.pdf

labelling.² The focus of our support is on the case for regulatory stewardship of the building system and opportunities for right touch regulatory intervention. We have observed that New Zealand's current reliance on the market to drive change is not reducing emissions in the building sector. It is our view that there is a case for regulatory intervention to drive change. We support the Structural Engineering Society of New Zealand's recommendation that regulation mandating reporting be introduced and that the Government signal incremental caps on embodied and operational emissions.

Additionally, we support work previously commissioned by MBIE on the circular economy and bioeconomy. If implemented, this work would reduce emissions in the built environment. It is our view that this work should be included in the building and construction component of the second ERP.

Energy

While we support the emphasis on renewable energy, it is our view that the ERP must go further to address the challenges of energy storage. The intermittent nature of renewable generation requires effective storage systems, or alternative generation options, to ensure a reliable electricity supply. To date the market has not, and will not, address this issue. The second ERP needs to signal the Government's intention on energy storage during dry years (when hydro lakes are low), as addressing New Zealand's energy challenges is critical to us achieving our emissions reduction targets.

Conclusion

We appreciate the opportunity to provide feedback on the Ministry for the Environment's consultation on New Zealand's second ERP. We would value an opportunity to be involved in ongoing conversations. Please do not hesitate to contact us if we can support this work.

Nāku, nā



Dr Richard Templer
Chief Executive

²Joint letter to Minister Watts and Minister Penk. <https://23159811.fs1.hubspotusercontent-na1.net/hubfs/23159811/Helping%20the%20market%20deliver%20better%20homes%20and%20buildings%20-%2027th%20June%202024%20-%20Joint%20letter%20to%20Minister%20Watts%20and%20Minister%20Penk.pdf>