

#36

COMPLETE

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Page 1: Introduction

Q1 Name (first and last name)

Rob Taylor

Q2 Email

Privacy of natural persons

Q3 Is this an individual submission, or is it on behalf of a group or organisation? **On behalf of a group or organisation**

Q4 Which group do you most identify with, or are representing? **Environmental**

Q5 Business name or organisation (if applicable)

Coal Action Network Aotearoa

Q6 Position title (if applicable)

Organising Committee member

Q7 Important information about your submission (important to read)The information provided in submissions will be used to inform the Ministry of Business, Innovation and Employment's (MBIE's) work on Accelerating renewable energy and energy efficiency.We will upload the submissions we receive and publish them on our website. If your submission contains any sensitive information that you do not want published, please indicate this in your submission.The Privacy Act 1993 applies to submissions. Any personal information you supply to MBIE in the course of making a submission will only be known by the team working on the Accelerating renewable energy and energy efficiency.Submissions may be requested under the Official Information Act 1982. Submissions provided in confidence can usually be withheld. MBIE will consult with submitters when responding to requests under the Official Information Act 1982.We intend to upload submissions to our website at www.mbie.govt.nz. Can we include your submission on the website?

Yes

Q8 Can we include your name?

Yes

Q9 Can we include your organisation (if submitting on behalf of an organisation)?

Yes

Q10 All other personal information will not be proactively released, although it may need to be released if required under the Official Information Act. Please indicate if there is any other information you would like withheld.

Respondent skipped this question

Page 2

Q11 Where are you located?

Respondent skipped this question

Q12 In what region or regions does your organisation mostly operate?

All of New Zealand

Page 3: Areas you wish to provide feedback on

Q13 Part A relates to process heat.Please indicate which sections, if any, you would like to provide feedback on.

Section 3: Innovating and building capability,
Section 4: Phasing out fossil fuels in process heat,
Section 5: Boosting investment in renewable energy and energy efficiency technologies
 ,
Section 6: Cost recovery mechanisms

Q37 Do you agree that a National Environmental Standards for Air Quality (NESAQ) users' guide on the development and operation of the wood energy facilities will help to reduce regulatory barriers to the use of wood energy for process heat?

Respondent skipped this question

Q38 What do you consider a NESAQ users' guide should cover? Please provide an explanation if possible.

Respondent skipped this question

Q39 Please describe any other options that you consider would be more effective at reducing regulatory barriers to the use of wood energy for process heat.

Respondent skipped this question

Q40 In your opinion, what technical rules relating to wood energy would be better addressed through the NESAQ than through the proposed users' guide (option 2.1)?

Respondent skipped this question

Page 8: Section 2 - continued: Developing markets for bioenergy and direct geothermal use

Q41 In your view, could the Industry Transformation Plans stimulate sufficient supply and demand for bioenergy to achieve desired outcomes?

Respondent skipped this question

Q42 What other options are worth considering?

Respondent skipped this question

Q43 Is Government best placed to provide market facilitation in bioenergy markets?

Respondent skipped this question

Q44 How could Government best facilitate bioenergy markets? Please be as specific as possible, giving examples.

Respondent skipped this question

Q45 In your view, how can government best support direct use of geothermal heat?

Respondent skipped this question

Q46 What other options are worth considering?

Respondent skipped this question

Page 9: Section 3: Innovating and building capability

Q47 Do you agree that de-risking commercially viable low-emission technology should be a focus of government support on process heat?

Strongly agree,
Please explain your answer:
As time is short to defer catastrophic climate change, a range of positive and negative Governmental incentives is required.

Q48 Do you agree that diffusing commercially viable low-emission technology should be a focus of government support on process heat?

Strongly agree,
Please explain your answer:
See answer above

Q49 Is Energy Efficiency and Conservation Authority (EECA) grant funding to support technology diffusion the best vehicle for this?

Yes

Q50 For manufacturers and energy service experts: would peer learning and lead to reducing perceived technology risks?

Respondent skipped this question

Q51 For manufacturers and energy service experts: would on-site technology demonstration visits lead to reducing perceived technology risks?

Respondent skipped this question

Q52 Is there a role for the Government in facilitating this?

Yes,
Please expand on your answer:
See answer above.

Page 10: Section 3 (continued): Innovating and building capability

Q53 For emissions-intensive and highly integrated (EIH) stakeholders: What are your views on our proposal to collaborate to develop low-carbon roadmaps?

Respondent skipped this question

Q54 Would low-carbon roadmaps assist in identifying feasible technological pathways for decarbonisation?

Respondent skipped this question

Q55 What are the most important issues that would benefit from a partnership and co-design approach?

Respondent skipped this question

Q56 What, in your view, is the scale of resourcing required to make this initiative successful?

Respondent skipped this question

Page 11: Section 4: Phasing out fossil fuels in process heat

Q57 Do you agree with the proposal to ban new coal-fired boilers for low and medium temperature requirements?

Strongly agree

Q58 Do you agree with the proposal to require existing coal-fired process heat equipment for end-use temperature requirements below 100 degrees Celsius to be phased out by 2030?

Strongly agree

Q59 Referring to Question 56 - is this ambitious or is it not doing enough?

Respondent skipped this question

Q60 For manufacturers: what would be the likely impacts or compliance costs on your business of a ban on new coal-fired process heat equipment?

Respondent skipped this question

Q61 For manufacturers: what would be the likely impacts or compliance costs on your business of requiring existing coal-fired process heat equipment supplying end-use temperature requirements below 100°C to be phased out by 2030.

Respondent skipped this question

Q62 Could the Corporate Energy Transition Plans (Option 1.1) help to design a more informed phase out of fossil fuels in process heat?

Respondent skipped this question

Q63 Would a timetabled phase out of fossil fuels in process heat be necessary alongside the Corporate Energy Transition Plans?

Yes,
Please explain your answer:
Time is of the essence if we are to defer catastrophic climate change, thus all available levers should be utilised.

Q64 In your view, could national direction under the Resource Management Act (RMA) be an effective tool to support clean and low greenhouse gas-emitting methods of industrial production?

Yes

Q65 If yes, how?

The RMA is the accepted method for controlling discharges to air

Q66 In your view, could adoption of best available technologies be introduced via a mechanism other than the RMA?

Yes,
Please explain your answer:
Should the RMA prove unequal to the task, further regulation and/or legislation should be considered.

Page 12: Section 5: Boosting investment in energy efficiency and renewable energy technologies

Q67 Do you agree that complementary measures to the New Zealand Emissions Trading Scheme (NZ-ETS) should be considered to accelerate the uptake of cost-effective clean energy projects?

Strongly agree

Q68 Would you favour regulation, financial incentives or both?

both,
Please explain your answer:
Once again, as time is of the essence, all possible levers should be utilised to reduce NZ's GHG emissions and to improve the resilience of its industries and communities.

Q69 In your view what is a bigger barrier to investment in clean energy technologies, internal competition for capital or access to capital? **Respondent skipped this question**

Q70 If you favour financial support, what sort of incentives could be considered? **Respondent skipped this question**

Q71 What are the benefits of these incentives? **Respondent skipped this question**

Q72 What are the risks of these incentives? **Respondent skipped this question**

Q73 What are the costs of these incentives? **Respondent skipped this question**

Q74 What measures other than those identified above could be effective at accelerating investment in clean energy technologies? **Respondent skipped this question**

Page 13: Section 6: Cost recovery mechanisms

Q75 What is your view on whether cost recovery mechanisms should be adopted to fund policy proposals in Part A of the Accelerating renewable energy and energy efficiency discussion document?

CANA supports such cost recovery mechanisms applied to coal use.

Q76 What are the advantages of introducing a levy on consumers of coal to fund process heat activities?

They will support and hasten the required conversion of coal plant to renewables.

Q77 What are the disadvantages of introducing a levy on consumers of coal to fund process heat activities? **Respondent skipped this question**

Page 14: Section 7: Enabling development of renewable energy under the Resource Management Act 1991

Q78 Do you agree that the current NPSREG gives sufficient weight and direction to the importance of renewable energy? **Respondent skipped this question**

Q79 What changes to the NPSREG would facilitate future development of renewable energy? **Respondent skipped this question**

Q80 What policies could be introduced or amended to provide sufficient direction to councils regarding the matters listed in points a-i mentioned on pages 60-61 of the discussion document? **Respondent skipped this question**

#59

COMPLETE

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Page 1: Introduction

Q1 Name (first and last name)

Rob Taylor

Q2 Email

Privacy of natural persons

Q3 Is this an individual submission, or is it on behalf of a group or organisation? **On behalf of a group or organisation**

Q4 Which group do you most identify with, or are representing? **Environmental**

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Coal Action Network Aotearoa

Q6 Position title (if applicable)

Organising Committee member

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Yes

Q8 Can we include your name?

Yes

Q9 Can we include your organisation (if submitting on behalf of an organisation)?

Yes

Q10 All other personal information will not be proactively released, although it may need to be released if required under the Official Information Act. Please indicate if there is any other information you would like withheld.

Respondent skipped this question

Page 2

Q11 Where are you located?

Respondent skipped this question

Q12 In what region or regions does your organisation mostly operate?

All of New Zealand

Page 3: Areas you wish to provide feedback on

Q13 Part A relates to process heat.Please indicate which sections, if any, you would like to provide feedback on.

Section 4: Phasing out fossil fuels in process heat

Q14 Part B relates to renewable electricity generation. Please indicate which sections, if any, you would like to provide feedback on.

Respondent skipped this question

Page 4: Section 1: Addressing information failures

Q27 Do you support customised low-emission heating feasibility studies? **Respondent skipped this question**

Q28 In your view, which of the components should be scaled up and/or prioritised? **Respondent skipped this question**

Q29 Would a customised low-emission heating feasibility study be of use to your business? **Respondent skipped this question**

Q30 Please describe any components other than those identified that could be included in an information package. **Respondent skipped this question**

Page 6: Section 1 - Option 1.3: Provide benchmarking information for food processing industries

Q31 Do you support benchmarking in the food processing sector? **Respondent skipped this question**

Q32 Would benchmarking be suited to, and useful for, other industries, such as wood processing? **Respondent skipped this question**

Q33 Do you believe government should have a role in facilitating this or should it entirely be led by industry? **Respondent skipped this question**

Q34 Please explain your answer **Respondent skipped this question**

Page 7: Section 2: Developing markets for bioenergy and direct geothermal use

Q35 Do you agree that some councils have regional air quality rules that are barriers to wood energy? **Respondent skipped this question**

Q36 Please provide examples of regional air quality rules that you see as barriers to wood energy. Please also note which council's plan you are referring to. **Respondent skipped this question**

Q37 Do you agree that a National Environmental Standards for Air Quality (NESAQ) users' guide on the development and operation of the wood energy facilities will help to reduce regulatory barriers to the use of wood energy for process heat? **Respondent skipped this question**

Q38 What do you consider a NESAQ users' guide should cover? Please provide an explanation if possible. **Respondent skipped this question**

Q51 For manufacturers and energy service experts: would on-site technology demonstration visits lead to reducing perceived technology risks?

Respondent skipped this question

Q52 Is there a role for the Government in facilitating this?

Respondent skipped this question

Page 10: Section 3 (continued): Innovating and building capability

Q53 For emissions-intensive and highly integrated (EIHI) stakeholders: What are your views on our proposal to collaborate to develop low-carbon roadmaps?

Respondent skipped this question

Q54 Would low-carbon roadmaps assist in identifying feasible technological pathways for decarbonisation?

Respondent skipped this question

Q55 What are the most important issues that would benefit from a partnership and co-design approach?

Respondent skipped this question

Q56 What, in your view, is the scale of resourcing required to make this initiative successful?

Respondent skipped this question

Page 11: Section 4: Phasing out fossil fuels in process heat

Q57 Do you agree with the proposal to ban new coal-fired boilers for low and medium temperature requirements?

Strongly agree

Q58 Do you agree with the proposal to require existing coal-fired process heat equipment for end-use temperature requirements below 100 degrees Celsius to be phased out by 2030?

Strongly agree

Q59 Referring to Question 56 - is this ambitious or is it not doing enough?

Not doing enough,
Please explain your answer:
This could be done sooner, with the right mix of incentives and penalties, plus public pressure, e.g. School Strike for Climate could protest coal-fired boilers in schools.

Q60 For manufacturers: what would be the likely impacts or compliance costs on your business of a ban on new coal-fired process heat equipment?

Respondent skipped this question

Q61 For manufacturers: what would be the likely impacts or compliance costs on your business of requiring existing coal-fired process heat equipment supplying end-use temperature requirements below 100°C to be phased out by 2030.

Respondent skipped this question

Q62 Could the Corporate Energy Transition Plans (Option 1.1) help to design a more informed phase out of fossil fuels in process heat?

Respondent skipped this question

Q63 Would a timetabled phase out of fossil fuels in process heat be necessary alongside the Corporate Energy Transition Plans?

Respondent skipped this question

Q64 In your view, could national direction under the Resource Management Act (RMA) be an effective tool to support clean and low greenhouse gas-emitting methods of industrial production?

Yes

Q65 If yes, how?

via an NPS

Q66 In your view, could adoption of best available technologies be introduced via a mechanism other than the RMA?

Yes,
Please explain your answer:
Financial incentives and penalties, e.g. taxation and an effective carbon price

Page 12: Section 5: Boosting investment in energy efficiency and renewable energy technologies

Q67 Do you agree that complementary measures to the New Zealand Emissions Trading Scheme (NZ-ETS) should be considered to accelerate the uptake of cost-effective clean energy projects?

Respondent skipped this question

Q68 Would you favour regulation, financial incentives or both?

Respondent skipped this question

Q69 In your view what is a bigger barrier to investment in clean energy technologies, internal competition for capital or access to capital?

Respondent skipped this question

Q70 If you favour financial support, what sort of incentives could be considered?

Respondent skipped this question

Q71 What are the benefits of these incentives?

Respondent skipped this question

Q83 Do you have any suggestions for how changes to the NPSREG could help achieve the right balance between renewable energy development and environmental outcomes?

Respondent skipped this question

Q84 What objectives or policies could be included in the NPSREG regarding councils' role in locating and planning strategically for renewable energy resources?

Respondent skipped this question

Q85 Can you identify any particular consenting barriers to development of other types of renewable energy than REG, such as green hydrogen, bioenergy and waste-to-energy facilities?

Respondent skipped this question

Q86 Can any specific policies be included in a national policy statement to address these barriers?

Respondent skipped this question

Q87 What specific policies could be included in the NPSREG for small-scale renewable energy projects?

Respondent skipped this question

Q88 The NPSREG currently does not provide any definition or threshold for "small and community-scale renewable electricity generation activities". Do you have any view on the definition or threshold for these activities?

Respondent skipped this question

Q89 What specific policies could be included to facilitate re-consenting consented but unbuilt wind farms, where consent variations are needed to allow the use of the latest technology?

Respondent skipped this question

Q90 Are there any downsides or risks to amending the NPSREG?

Respondent skipped this question

Page 15: Section 7 - continued

Q91 Do you agree that National Environmental Standards (NES) would be an effective and appropriate tool to accelerate the development of new renewables and streamline re-consenting?

Respondent skipped this question

Q92 What are the pros of using National Environmental Standards as a tool to accelerate the development of new renewables and streamline re-consenting?

Respondent skipped this question

Q93 What are the cons of using National Environmental Standards as a tool to accelerate the development of new renewables and streamline re-consenting?

Respondent skipped this question

#60

COMPLETE

Collector: Final submissions link (Web Link)
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Page 1: Introduction

Q1 Name (first and last name)

Rob Taylor

Q2 Email

Privacy of natural persons

Q3 Is this an individual submission, or is it on behalf of a group or organisation? **On behalf of a group or organisation**

Q4 Which group do you most identify with, or are representing? **Environmental**

Q5 Business name or organisation (if applicable)

Coal Action Network Aotearoa

Q6 Position title (if applicable)

Organising Committee member

Q7 Important information about your submission (important to read)The information provided in submissions will be used to inform the Ministry of Business, Innovation and Employment's (MBIE's) work on Accelerating renewable energy and energy efficiency.We will upload the submissions we receive and publish them on our website. If your submission contains any sensitive information that you do not want published, please indicate this in your submission.The Privacy Act 1993 applies to submissions. Any personal information you supply to MBIE in the course of making a submission will only be known by the team working on the Accelerating renewable energy and energy efficiency.Submissions may be requested under the Official Information Act 1982. Submissions provided in confidence can usually be withheld. MBIE will consult with submitters when responding to requests under the Official Information Act 1982.We intend to upload submissions to our website at www.mbie.govt.nz. Can we include your submission on the website?

Yes

Q8 Can we include your name?

Yes

Q9 Can we include your organisation (if submitting on behalf of an organisation)?

Yes

Q10 All other personal information will not be proactively released, although it may need to be released if required under the Official Information Act. Please indicate if there is any other information you would like withheld.

Respondent skipped this question

Page 2

Q11 Where are you located?

Respondent skipped this question

Q12 In what region or regions does your organisation mostly operate?

All of New Zealand

Page 3: Areas you wish to provide feedback on

Q13 Part A relates to process heat.Please indicate which sections, if any, you would like to provide feedback on.

Section 6: Cost recovery mechanisms

Q14 Part B relates to renewable electricity generation. Please indicate which sections, if any, you would like to provide feedback on.

Respondent skipped this question

Page 4: Section 1: Addressing information failures

Page 13: Section 6: Cost recovery mechanisms

Q75 What is your view on whether cost recovery mechanisms should be adopted to fund policy proposals in Part A of the Accelerating renewable energy and energy efficiency discussion document?

We support cost recovery from coal consumers

Q76 What are the advantages of introducing a levy on consumers of coal to fund process heat activities?

A levy will provide a further incentive for consumers to transition from coal to renewables.

Q77 What are the disadvantages of introducing a levy on consumers of coal to fund process heat activities?

Respondent skipped this question

Page 14: Section 7: Enabling development of renewable energy under the Resource Management Act 1991

Q78 Do you agree that the current NPSREG gives sufficient weight and direction to the importance of renewable energy?

Respondent skipped this question

Q79 What changes to the NPSREG would facilitate future development of renewable energy?

Respondent skipped this question

Q80 What policies could be introduced or amended to provide sufficient direction to councils regarding the matters listed in points a-i mentioned on pages 60-61 of the discussion document?

Respondent skipped this question

Q81 How should the NPSREG address the balancing of local environmental effects and the national benefits of renewable energy development in RMA decisions?

Respondent skipped this question

Q82 What are your views on the interaction and relative priority of the NPSREG with other existing or pending national direction instruments?

Respondent skipped this question

Q83 Do you have any suggestions for how changes to the NPSREG could help achieve the right balance between renewable energy development and environmental outcomes?

Respondent skipped this question

Q84 What objectives or policies could be included in the NPSREG regarding councils' role in locating and planning strategically for renewable energy resources?

Respondent skipped this question

#30

INCOMPLETE

Collector: Final submissions link (Web Link)
Started: Monday, February 24, 2020 11:08:52 AM
Last Modified: Monday, February 24, 2020 11:59:31 AM
Time Spent: 00:50:39

Page 1: Introduction

Q1 Name (first and last name)

Rob Taylor

Q2 Email

Privacy of natural persons

Q3 Is this an individual submission, or is it on behalf of a group or organisation? **On behalf of a group or organisation**

Q4 Which group do you most identify with, or are representing? **Environmental**

Q5 Business name or organisation (if applicable)

Coal Action Network Aotearoa

Q6 Position title (if applicable) **Respondent skipped this question**

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Yes

Q8 Can we include your name?

Yes

Q9 Can we include your organisation (if submitting on behalf of an organisation)?

Yes

Q10 All other personal information will not be proactively released, although it may need to be released if required under the Official Information Act. Please indicate if there is any other information you would like withheld.

Respondent skipped this question

Page 2

Q11 Where are you located?

Respondent skipped this question

Q12 In what region or regions does your organisation mostly operate?

All of New Zealand

Page 3: Areas you wish to provide feedback on

Q13 Part A relates to process heat. Please indicate which sections, if any, you would like to provide feedback on.

Section 1: Addressing information failures,
Section 2: Developing markets for bioenergy and direct geothermal use
,
Section 3: Innovating and building capability,
Section 4: Phasing out fossil fuels in process heat,
Section 5: Boosting investment in renewable energy and energy efficiency technologies
,
Section 6: Cost recovery mechanisms

Q14 Part B relates to renewable electricity generation. Please indicate which sections, if any, you would like to provide feedback on.

Section 7: Enabling renewables uptake under the Resource Management Act 1991
,
Section 8: Supporting renewable electricity generation investment
,
Section 9: Facilitating local and community engagement in renewable energy and energy efficiency
,
Section 10: Connecting to the national grid,
Section 11: Local network connections and trading arrangements

Page 4: Section 1: Addressing information failures

Q15 Option 1.1 would require large energy users to report their emissions and energy use annually, publish Corporate Energy Transitions Plans and conduct energy audits every four years. Do you support this option?

Yes - I fully support this option

Q16 Please explain your answer

The collection of objective, consistent and verifiable data is essential to identify issues, set goals and measure progress toward them.

Q17 Which parts (set out in Table 3) do you support?

Respondent skipped this question

Q18 Please explain your answer

Respondent skipped this question

Q19 What public reporting requirements (listed in Table 3) should be disclosed?

Annual corporate-level energy use and emissions, split out by a range of sources including coal, gas, electricity and transport

,

Energy efficiency actions taken that year,

Plans to reduce emissions to 2030,

Other (please specify):

anything recommended by the Climate change Commission

Q20 In your view, should businesses be expected to include transport energy and emissions in these reporting requirements?

Yes,

Please explain your answer:

because transport is both an important component of emissions and a challenge for fossil fuel reduction efforts

Q21 For manufacturers: what will be the impact on your business to comply with the requirements?

No impact

Q22 Option 1.1. Suggests that requirements to publish Corporate Energy Transition Plans should apply to large energy users, and proposes defining large energy users as those with an annual energy spend (purchased) of greater than \$2 million per annum. Do you agree with this definition?

No

Q23 If you selected no, please describe what in your view would be an appropriate threshold to define 'large energy users'.

Those with energy purchases of more than \$1M per annum

Q24 Is there any potential for unnecessary duplication under these proposals and the disclosures proposed in the MBIE-Ministry for the Environment discussion document Climate-related Financial Disclosures – Understanding your business risks and opportunities related to climate change, October 2019?

No

Page 5: Section 1 - Option 1.2: Electrification information package and feasibility studies

Q25 Do you support the proposal to develop an electrification information package?

Respondent skipped this question

Q26 Would an electrification information package be of use to your business?

Respondent skipped this question

#31

INCOMPLETE

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Page 1: Introduction

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Rob Taylor

Q2 Email

Privacy of natural persons

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Yes

Q9 Can we include your organisation (if submitting on behalf of an organisation)?

Yes

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Respondent skipped this question

Page 2

Q11 Where are you located?

Respondent skipped this question

Q12 In what region or regions does your organisation mostly operate?

All of New Zealand

Page 3: Areas you wish to provide feedback on

Q13 Part A relates to process heat. Please indicate which sections, if any, you would like to provide feedback on.

Section 1: Addressing information failures,
Section 2: Developing markets for bioenergy and direct geothermal use
,
Section 3: Innovating and building capability,
Section 4: Phasing out fossil fuels in process heat,
Section 5: Boosting investment in renewable energy and energy efficiency technologies
,
Section 6: Cost recovery mechanisms

Q14 Part B relates to renewable electricity generation. Please indicate which sections, if any, you would like to provide feedback on.

Section 7: Enabling renewables uptake under the Resource Management Act 1991
,
Section 8: Supporting renewable electricity generation investment
,
Section 9: Facilitating local and community engagement in renewable energy and energy efficiency
,
Section 10: Connecting to the national grid,
Section 11: Local network connections and trading arrangements

Page 4: Section 1: Addressing information failures

Q15 Option 1.1 would require large energy users to report their emissions and energy use annually, publish Corporate Energy Transitions Plans and conduct energy audits every four years. Do you support this option?

Yes - I fully support this option

Q16 Please explain your answer

Objective, consistent and verifiable data is required to identify issues, set goals and monitor progress

Q17 Which parts (set out in Table 3) do you support?

Target group - companies with an annual energy spend of greater than \$2 million per annum
,
Public reporting,
Government reporting,
Energy auditing,
Compliance

Q18 Please explain your answer

Reducing fossil fuel emissions is an existential requirement if our civilisation is to endure and prosper. A problem this serious requires serious endeavours from all parties

Q19 What public reporting requirements (listed in Table 3) should be disclosed?

Annual corporate-level energy use and emissions, split out by a range of sources including coal, gas, electricity and transport

Energy efficiency actions taken that year,

Plans to reduce emissions to 2030,

Other (please specify):

anything recommended by the Climate change Commission

Q20 In your view, should businesses be expected to include transport energy and emissions in these reporting requirements?

Yes,

Please explain your answer:

Transport is both an important component of NZ's fossil fuel emissions, and a challenge to replace with renewables

Q21 For manufacturers: what will be the impact on your business to comply with the requirements?

Respondent skipped this question

Q22 Option 1.1. Suggests that requirements to publish Corporate Energy Transition Plans should apply to large energy users, and proposes defining large energy users as those with an annual energy spend (purchased) of greater than \$2 million per annum. Do you agree with this definition?

No

Q23 If you selected no, please describe what in your view would be an appropriate threshold to define 'large energy users'.

those with an annual energy spend (purchased) of greater than \$1 million per annum.

Q24 Is there any potential for unnecessary duplication under these proposals and the disclosures proposed in the MBIE-Ministry for the Environment discussion document Climate-related Financial Disclosures – Understanding your business risks and opportunities related to climate change, October 2019?

No

Page 5: Section 1 - Option 1.2: Electrification information package and feasibility studies

Q25 Do you support the proposal to develop an electrification information package?

Yes

Q26 Would an electrification information package be of use to your business? **Yes**

Q27 Do you support customised low-emission heating feasibility studies? **Yes**

Q28 In your view, which of the components should be scaled up and/or prioritised?

providing information about ways to increase reliability and resilience of electrically- supplied plant and systems **Prioritised**

co-funding low-emission heating feasibility studies for EECA's business partners **Scaled up**

Q29 Would a customised low-emission heating feasibility study be of use to your business? **No**

Q30 Please describe any components other than those identified that could be included in an information package. **Respondent skipped this question**

Page 6: Section 1 - Option 1.3: Provide benchmarking information for food processing industries

Q31 Do you support benchmarking in the food processing sector? **Respondent skipped this question**

Q32 Would benchmarking be suited to, and useful for, other industries, such as wood processing? **Respondent skipped this question**

Q33 Do you believe government should have a role in facilitating this or should it entirely be led by industry? **Respondent skipped this question**

Q34 Please explain your answer **Respondent skipped this question**

Page 7: Section 2: Developing markets for bioenergy and direct geothermal use

Q35 Do you agree that some councils have regional air quality rules that are barriers to wood energy? **Respondent skipped this question**

Q36 Please provide examples of regional air quality rules that you see as barriers to wood energy. Please also note which council's plan you are referring to. **Respondent skipped this question**

#32

COMPLETE

Collector: Final submissions link (Web Link)
Started: Monday, February 24, 2020 12:21:52 PM
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Time Spent: 00:17:07

Page 1: Introduction

Q1 Name (first and last name)

Rob Taylor

Q2 Email

Privacy of natural persons

Q3 Is this an individual submission, or is it on behalf of a group or organisation? **On behalf of a group or organisation**

Q4 Which group do you most identify with, or are representing? **Environmental**

Q5 Business name or organisation (if applicable)

Coal Action Network Aotearoa

Q6 Position title (if applicable)

Organising Committee member

Q7 Important information about your submission (important to read)The information provided in submissions will be used to inform the Ministry of Business, Innovation and Employment's (MBIE's) work on Accelerating renewable energy and energy efficiency.We will upload the submissions we receive and publish them on our website. If your submission contains any sensitive information that you do not want published, please indicate this in your submission.The Privacy Act 1993 applies to submissions. Any personal information you supply to MBIE in the course of making a submission will only be known by the team working on the Accelerating renewable energy and energy efficiency.Submissions may be requested under the Official Information Act 1982. Submissions provided in confidence can usually be withheld. MBIE will consult with submitters when responding to requests under the Official Information Act 1982.We intend to upload submissions to our website at www.mbie.govt.nz. Can we include your submission on the website?

Yes

Q8 Can we include your name?

Yes

Q9 Can we include your organisation (if submitting on behalf of an organisation)?

Yes

Q10 All other personal information will not be proactively released, although it may need to be released if required under the Official Information Act. Please indicate if there is any other information you would like withheld.

Respondent skipped this question

Page 2

Q11 Where are you located?

Respondent skipped this question

Q12 In what region or regions does your organisation mostly operate?

All of New Zealand

Page 3: Areas you wish to provide feedback on

Q13 Part A relates to process heat.Please indicate which sections, if any, you would like to provide feedback on.

Section 1: Addressing information failures

Q14 Part B relates to renewable electricity generation. Please indicate which sections, if any, you would like to provide feedback on.

Respondent skipped this question

Page 4: Section 1: Addressing information failures

Q15 Option 1.1 would require large energy users to report their emissions and energy use annually, publish Corporate Energy Transitions Plans and conduct energy audits every four years. Do you support this option?

Yes - I fully support this option

Q16 Please explain your answer

Objective, verifiable and consistent information is essential to initiate, monitor and improve strategies to reduce NZ's emissions

Q17 Which parts (set out in Table 3) do you support?

Target group - companies with an annual energy spend of greater than \$2 million per annum

,
Public reporting,
Government reporting,
Energy auditing,
Compliance

Q18 Please explain your answer

Resolving such an existential issue requires a serious commitment from all parties

Q19 What public reporting requirements (listed in Table 3) should be disclosed?

Annual corporate-level energy use and emissions, split out by a range of sources including coal, gas, electricity and transport

,
Energy efficiency actions taken that year,
Plans to reduce emissions to 2030,
Other (please specify):
anything recommended by the Climate change Commission

Q20 In your view, should businesses be expected to include transport energy and emissions in these reporting requirements?

Yes,
Please explain your answer:
Transport is an important and challenging component of NZ's fossil fuel use

Q21 For manufacturers: what will be the impact on your business to comply with the requirements?

Respondent skipped this question

Q22 Option 1.1. Suggests that requirements to publish Corporate Energy Transition Plans should apply to large energy users, and proposes defining large energy users as those with an annual energy spend (purchased) of greater than \$2 million per annum. Do you agree with this definition?

No

Q23 If you selected no, please describe what in your view would be an appropriate threshold to define 'large energy users'.

Those with an annual energy spend greater than \$1M per annum

Q24 Is there any potential for unnecessary duplication under these proposals and the disclosures proposed in the MBIE-Ministry for the Environment discussion document Climate-related Financial Disclosures – Understanding your business risks and opportunities related to climate change, October 2019? **No**

Page 5: Section 1 - Option 1.2: Electrification information package and feasibility studies

Q25 Do you support the proposal to develop an electrification information package? **Yes**

Q26 Would an electrification information package be of use to your business? **Yes**

Q27 Do you support customised low-emission heating feasibility studies? **Yes**

Q28 In your view, which of the components should be scaled up and/or prioritised?

providing information about ways to increase reliability and resilience of electrically- supplied plant and systems **Scaled up, Prioritised**

co-funding low-emission heating feasibility studies for EECA's business partners **Prioritised**

Q29 Would a customised low-emission heating feasibility study be of use to your business? **No**

Q30 Please describe any components other than those identified that could be included in an information package. **Respondent skipped this question**

Page 6: Section 1 - Option 1.3: Provide benchmarking information for food processing industries

Q31 Do you support benchmarking in the food processing sector? **Yes**

Q32 Would benchmarking be suited to, and useful for, other industries, such as wood processing? **Yes (please specify):**
wood processing and road freight

Q33 Do you believe government should have a role in facilitating this or should it entirely be led by industry? **Government should have a role**

Q34 Please explain your answer

Time is running out, so government should push this process along

Page 7: Section 2: Developing markets for bioenergy and direct geothermal use

Q35 Do you agree that some councils have regional air quality rules that are barriers to wood energy? **Respondent skipped this question**

Q36 Please provide examples of regional air quality rules that you see as barriers to wood energy. Please also note which council's plan you are referring to. **Respondent skipped this question**

Q37 Do you agree that a National Environmental Standards for Air Quality (NESAQ) users' guide on the development and operation of the wood energy facilities will help to reduce regulatory barriers to the use of wood energy for process heat? **Respondent skipped this question**

Q38 What do you consider a NESAQ users' guide should cover? Please provide an explanation if possible. **Respondent skipped this question**

Q39 Please describe any other options that you consider would be more effective at reducing regulatory barriers to the use of wood energy for process heat. **Respondent skipped this question**

Q40 In your opinion, what technical rules relating to wood energy would be better addressed through the NESAQ than through the proposed users' guide (option 2.1)? **Respondent skipped this question**

Page 8: Section 2 - continued: Developing markets for bioenergy and direct geothermal use

Q41 In your view, could the Industry Transformation Plans stimulate sufficient supply and demand for bioenergy to achieve desired outcomes? **Respondent skipped this question**

Q42 What other options are worth considering? **Respondent skipped this question**

Q43 Is Government best placed to provide market facilitation in bioenergy markets? **Respondent skipped this question**

Q44 How could Government best facilitate bioenergy markets? Please be as specific as possible, giving examples. **Respondent skipped this question**

Q45 In your view, how can government best support direct use of geothermal heat?

Respondent skipped this question

Q46 What other options are worth considering?

Respondent skipped this question

Page 9: Section 3: Innovating and building capability

Q47 Do you agree that de-risking commercially viable low-emission technology should be a focus of government support on process heat?

Respondent skipped this question

Q48 Do you agree that diffusing commercially viable low-emission technology should be a focus of government support on process heat?

Respondent skipped this question

Q49 Is Energy Efficiency and Conservation Authority (EECA) grant funding to support technology diffusion the best vehicle for this?

Respondent skipped this question

Q50 For manufacturers and energy service experts: would peer learning and lead to reducing perceived technology risks?

Respondent skipped this question

Q51 For manufacturers and energy service experts: would on-site technology demonstration visits lead to reducing perceived technology risks?

Respondent skipped this question

Q52 Is there a role for the Government in facilitating this?

Respondent skipped this question

Page 10: Section 3 (continued): Innovating and building capability

Q53 For emissions-intensive and highly integrated (EIH) stakeholders: What are your views on our proposal to collaborate to develop low-carbon roadmaps?

Respondent skipped this question

Q54 Would low-carbon roadmaps assist in identifying feasible technological pathways for decarbonisation?

Respondent skipped this question

Q55 What are the most important issues that would benefit from a partnership and co-design approach?

Respondent skipped this question

Q56 What, in your view, is the scale of resourcing required to make this initiative successful?

Respondent skipped this question

Page 11: Section 4: Phasing out fossil fuels in process heat

Q199 What changes, if any, to the current arrangements would ensure distribution networks are fit for purpose into the future?

Respondent skipped this question

Page 29: Additional comments

Q200 Do you have any additional feedback?

The single most effective action Government can take is to implement a carbon price of \$60 - \$120 per tonne of CO2-eq (see p.16)

Q201 You may upload additional feedback as a file. File size limit is 16MB. We accept PDF or DOC/DOCX.

Respondent skipped this question
