



JacksonStone House  
3-11 Hunter Street  
PO Box 1925  
Wellington 6140  
New Zealand

---

DDI: 04 496-6560  
Tel: 04 496-6555  
Mob: 027 463 3212  
cbeard@expornz.org.nz  
www.expornz.org.nz

26 February 2020

**Submission to MBIE on the Discussion paper: Accelerating renewable energy and energy efficiency.**

ExportNZ is a division of BusinessNZ – representing exporters in New Zealand, with 8 regional offices around New Zealand including in Auckland, Waikato, Bay of Plenty, Manawatu, Hawkes Bay, Wellington, Christchurch and Dunedin.

Our membership is a mixture of large, medium and small sized exporters, covering a range of sectors, including manufacturing, technology, digital, services and goods exporters.

We are submitting on this discussion paper in support of the BusinessNZ Energy Council (BEC) submission, and in particular we want to emphasise two issues.

**Corporate Energy Transition Plans (1.1)**

Require large energy users to publish Corporate Energy Transition Plans (including reporting emissions) and conduct energy audits.

ExportNZ supports the BEC submission on this point. In our experience, large energy intensive firms are hugely focussed on energy costs, since they impact on the bottom line. We have been working with Energy Intensive Trade Exposed firms for years and are aware that most of them have achieved significant emissions reductions over the last 16 years, from a 1990 baseline. The three main concerns we have with this proposal, is that it will add additional compliance costs to firms that are not necessarily very big, there will be regulatory overlap with TCFD disclosures, and the reporting is a way to name and shame firms that use a lot of energy in the making of products that can often be made no other way.

Also – when you have been squeezing energy efficiency out of your manufacturing and processing activities for the last 20 years, a new set of reporting from 2020 does not capture that journey. Already – media reporting

on emissions and industry is done in a very emotive way. A quick google search shows large energy intensive businesses are referred to as ‘large polluters getting subsidies to pollute’. They never get referred to as companies that make things that consumers want to consume, such as paper, glass, packaging, steel, aluminium, cement, dairy products and glasshouse products. Unless there is some context to the reporting that shows the emission reduction journey our firms have been on, we see this as having overly negative impacts on the desirability of doing business in New Zealand, both from a cost and reputational point of view.

### **3.2 Industrial innovation and transitioning to a low-carbon future**

Collaborate with EIH industry to foster knowledge sharing, develop sectoral low carbon roadmaps and build capability for the future using a Just Transitions approach.

ExportNZ supports the BEC proposal that this function would be better carried out with an independent platform for collaboration facilitated by a group like BEC. From our experience, many of these large energy intensive businesses are part of a multi-national organisation or have significant foreign investment and or ownership. They are well connected into global industry groups leading the way on low carbon technology and processing. It would be good to have Government support to bring international experts to New Zealand, but this should be done in close consultation with industry through a group like the BusinessNZ Energy Council.

We do support industry and Government collaboration in order to *Develop a shared understanding of international R&D for “hard-to-abate” industries and identify unique issues for New Zealand R&D efforts.* We think this will be important going forward.

Many thanks for the opportunity to submit.

Yours Sincerely



Catherine Beard  
Executive Director  
ExportNZ & ManufacturingNZ