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**WWF-NEW ZEALAND
SUBMISSION TO THE
CLIMATE CHANGE
COMMISSION DRAFT ADVICE -
CLIMATE ACTION FOR
AOTEAROA**

WWF welcomes the opportunity to submit written feedback in response to the Climate Change Commission (CCC) 2021 draft advice. We also enclose our assessment of the latest Nationally Determined Contribution (NDC), according to the [WWF NDCWeWant checklist](#)¹.

On April 22, 2020, New Zealand submitted to the UNFCCC an update of the NDC in response to paragraphs 24 and 25 of decision 1/CP.21 1. Although this was formally an updated NDC, national climate targets remained in line with the previous NDC, and our analysis indicated it fell short against numerous criteria of ambition (including fostering structural change, inclusivity and participation, and contribution to sustainable development). Based on our analysis, the NDC fails to comply with CMA.1 2, and rated poor or very poor across all criteria.

The CCC's draft advice should provide meaningful advice and recommendations on not just whether the NDC should change to make it consistent with New Zealand's contribution to the global 1.5°C temperature goal, but also on how. We invite the CCC to review our findings in our initial assessment in the attached document, and consider the NDCWeWant criteria as measures for success in formulating its recommendations to the New Zealand Government.

We expect that the Commission's final advice – and in particular its recommendation for an appropriate NDC – as vital in ensuring that New Zealand delivers fair and ambitious climate action in line with limiting global temperature rise to 1.5°C. As noted by Dr Carr, *'All of us have a part to play and a contribution to make.'*

We urge the CCC to recommend that the New Zealand Government submit an updated, enhanced NDC in compliance with CMA.1 2 in advance of COP26, and that the CCC carefully reconsider the highest possible ambition in recommending five yearly emissions budgets.

In doing so, we call on the CCC to consider the following recommendations:

- **The CCC should promote the vital role of nature in meeting the commitments of the NDC**, looking beyond forests where appropriate. It is important that the CCC urges the Government to recognise the value of nature in climate action and thus to make early investment in nature-based solutions (NbS), ensuring that New Zealand will realise the resulting socio-economic, environmental and climate benefits ahead of 2050. In doing so the CCC should highlight opportunities to invest in nature which will help address the biodiversity crisis and deliver wider socio-economic benefits.
- **The CCC should further press the importance of a healthy and growing carbon sink** in ensuring that New Zealand can meet carbon reduction commitments domestically as much as possible, and to ensure not to reduce the impact of climate mitigation efforts elsewhere: NDC targets should include protecting existing carbon stocks. Within your advice, we also ask the CCC to further emphasise the importance of enhancing our carbon sinks through improved management, restoration and the creation

¹ A WWF initiative through which we are assessing enhanced NDCs against necessary success criteria to meet the aspirations of the Paris Agreement. See: https://wwf.panda.org/discover/our_focus/climate_and_energy_practice/ndcs_we_want/

of a broad range of native habitats. This calls on appropriate planning for restoration and resilience activities to be embedded in the NDC *as well as* National Adaptation Planning.

- **This advice should acknowledge the impressive economic returns to investing in a low carbon transition.** It is as appropriate to consider the projected socio-economic benefits to transitioning to a low carbon economy, as it is the economic costs. Action to tackle the climate emergency has the potential to help to generate thousands of new jobs and support inclusive growth across the whole of the New Zealand. Omitting this and the potential for economic and social transformation will risk potential misunderstandings on the net impact of early climate action. Currently, the CCC has considered the costs of action, but not the benefits.
- We commend the CCC in recognising circumstances and capability in climate action and the need to offer support to those in need. **We ask that the CCC is explicit also on nationally relevant opportunities for addressing inequality and boosting inclusivity and wellbeing through the low carbon transition, including through fostering a just and inclusive transformation across the economy.** This should include setting out the role of the Just Transition Unit in accelerating climate action to achieve positive social growth and establish linkages with the 2030 Agenda.
- WWF commends the efforts of the CCC in setting out with greater clarity the role of international markets in New Zealand's climate ambition. We note, however that engaging with international carbon markets through projects in another country outsources any social and environmental risks. **We urge the CCC to ensure framing of climate action to deliver the NDC emphasises maximum effort for domestic decarbonisation.**
- The sum of NDCs equates to the global commitments to meeting the Paris Agreement. As such, a key aspect of New Zealand's role in global ambition is to support transparency and assessment on global action. **The CCC advice should press the importance of re-submitting an updated national NDC, including an enhanced target of 80% or more reductions from 2005 levels to the UNFCCC before 31 July 2021, ensuring their efforts can be assessed in the NDC Synthesis Report to be presented at COP26.**

WWF is committed to supporting the global process of NDC enhancement in this important year - advising on how we can limit global temperature rise to 1.5°C through implementing sufficient and ambitious commitments set out in NDCs. We would welcome the opportunity to talk about any of these points in more detail as you are in the process of finalising this key report on Climate Ambition.