

## Ken Ng

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**From:** Rebekah Rennell  
**Sent:** Friday, 4 August 2023 10:09 am  
**To:** Freya.Farrar@mfe.govt.nz  
**Cc:** Lisa Rossiter; Jared Humm  
**Subject:** RE: [IN-CONFIDENCE]RE: [Feedback due COP 7 August] Draft Cabinet paper for departmental consultation - Scope, approach, timeframes and accountability for delivering the second emissions reduction plan

Kia Ora Freya,

Thank you for the chance to review progress on this – we have been engaging on feedback via MoT.

Therefore, Waka Kotahi requests that it is excluded from the list of agencies consulted (i.e., page 14). While we have received the paper and are highly engaged in this process to enable MoT to provide informed transport sector input, all Waka Kotahi feedback on Cabinet Papers on the ERP will be through MoT. This arrangement upholds the roles of each agency in terms of policy advice to government.

We definitely wish to continue to receive key papers directly, so that we are able to provide that informed input wherever needed- and at increasing pace over the next year no doubt!

Mihi Nui,

### Rebekah Rennell

**Strategic Advisor**

**Haumarua Taiao | Environment and Sustainability Team**

System Leadership

Email: [rebekah.rennell@nzta.govt.nz](mailto:rebekah.rennell@nzta.govt.nz)

Mobile: [section 9\(2\)\(a\)](#)

**Waka Kotahi** NZ Transport Agency

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**From:** Freya Farrar <[Freya.Farrar@mfe.govt.nz](mailto:Freya.Farrar@mfe.govt.nz)>

**Sent:** Wednesday, 2 August 2023 3:39 pm

**To:** climate.change <[climate.change@mbie.govt.nz](mailto:climate.change@mbie.govt.nz)>; Sara Elgoran <[Sara.Elgoran001@msd.govt.nz](mailto:Sara.Elgoran001@msd.govt.nz)>; Melissa Cathro <[Melissa.Cathro002@msd.govt.nz](mailto:Melissa.Cathro002@msd.govt.nz)>; [H.Walker@transport.govt.nz](mailto:H.Walker@transport.govt.nz); Lisa Rossiter <[Lisa.Rossiter@nzta.govt.nz](mailto:Lisa.Rossiter@nzta.govt.nz)>; Sophia Murphy [EXTERNAL] (MPI) <[Sophia.Murphy@mpi.govt.nz](mailto:Sophia.Murphy@mpi.govt.nz)>; Carly Soo [TSY] <[Carly.Soo@treasury.govt.nz](mailto:Carly.Soo@treasury.govt.nz)>; Nicky Lynch [TSY] <[nicky.lynch@treasury.govt.nz](mailto:nicky.lynch@treasury.govt.nz)>; [Joanna.Pohatu@tpk.govt.nz](mailto:Joanna.Pohatu@tpk.govt.nz); Kathryn Hazlewood <[Kathryn.Hazlewood@mfe.govt.nz](mailto:Kathryn.Hazlewood@mfe.govt.nz)>; Miranda Cross <[Miranda.Cross@mfe.govt.nz](mailto:Miranda.Cross@mfe.govt.nz)>; James Coombes <[James.Coombes@mfe.govt.nz](mailto:James.Coombes@mfe.govt.nz)>; Rebecca Clements <[Rebecca.Clements@mfe.govt.nz](mailto:Rebecca.Clements@mfe.govt.nz)>; Connie May Nisbet <[ConnieMay.Nisbet@mfe.govt.nz](mailto:ConnieMay.Nisbet@mfe.govt.nz)>; Meredith Davis <[Meredith.Davis@mfe.govt.nz](mailto:Meredith.Davis@mfe.govt.nz)>; Emma Corbett <[Emma.Corbett@mfe.govt.nz](mailto:Emma.Corbett@mfe.govt.nz)>; Hakarangi Tichborne <[Hakarangi.Tichborne@mfe.govt.nz](mailto:Hakarangi.Tichborne@mfe.govt.nz)>; [miriam.gibson@education.govt.nz](mailto:miriam.gibson@education.govt.nz); Phil Wise <[Phil.Wise@education.govt.nz](mailto:Phil.Wise@education.govt.nz)>; Compton, Jan <[Jan.Compton@tearawhiti.govt.nz](mailto:Jan.Compton@tearawhiti.govt.nz)>; Cathy Steel <[Cathy.Steel@hud.govt.nz](mailto:Cathy.Steel@hud.govt.nz)>; Monique Cornish <[Monique.Cornish@infracom.govt.nz](mailto:Monique.Cornish@infracom.govt.nz)>; Anna Broadhurst [EXTERNAL] (MFAT) <[Anna.Broadhurst@mfat.govt.nz](mailto:Anna.Broadhurst@mfat.govt.nz)>; Alex Smith <[alsmith@doc.govt.nz](mailto:alsmith@doc.govt.nz)>; Jane McKessar [EXTERNAL] (DOC) <[JMckessar@doc.govt.nz](mailto:JMckessar@doc.govt.nz)>; Kay Shapland (Elizabeth) <[kay.shapland@mpi.govt.nz](mailto:kay.shapland@mpi.govt.nz)>; Megan Bell [EXTERNAL] (TPK) <[bellm@tpk.govt.nz](mailto:bellm@tpk.govt.nz)>; [Natasha.VonRandow@kaingaora.govt.nz](mailto:Natasha.VonRandow@kaingaora.govt.nz); Claire McClintock <[claire.mcclintock@mpi.govt.nz](mailto:claire.mcclintock@mpi.govt.nz)>; Will Jensen <[Will.Jensen@eeca.govt.nz](mailto:Will.Jensen@eeca.govt.nz)>

**Cc:** Stephen Goodman <[Stephen.Goodman@mfe.govt.nz](mailto:Stephen.Goodman@mfe.govt.nz)>; Simon Mandal-Johnson <[Simon.Mandal-Johnson@mfe.govt.nz](mailto:Simon.Mandal-Johnson@mfe.govt.nz)>; Hemi Smiler <[Hemi.Smiler@mfe.govt.nz](mailto:Hemi.Smiler@mfe.govt.nz)>; Jacqui Ruesga <[Jacqui.Ruesga@mfe.govt.nz](mailto:Jacqui.Ruesga@mfe.govt.nz)>;

Alex Hunter <[Alexandra.Hunter1@mfe.govt.nz](mailto:Alexandra.Hunter1@mfe.govt.nz)>; Jemima Jamieson <[Jemima.Jamieson@mfe.govt.nz](mailto:Jemima.Jamieson@mfe.govt.nz)>; Dale Warburton <[Dale.Warburton1@mfe.govt.nz](mailto:Dale.Warburton1@mfe.govt.nz)>; Letisha Nicholas <[Letisha.Nicholas@mfe.govt.nz](mailto:Letisha.Nicholas@mfe.govt.nz)>; Rasheeda Woolford <[Rasheeda.Woolford@mfe.govt.nz](mailto:Rasheeda.Woolford@mfe.govt.nz)>; David Kohai <[David.Kohai@mfe.govt.nz](mailto:David.Kohai@mfe.govt.nz)>; Francesca Williams <[Francesca.Williams@mfe.govt.nz](mailto:Francesca.Williams@mfe.govt.nz)>; Akane Sandom <[Akane.Sandom@mfe.govt.nz](mailto:Akane.Sandom@mfe.govt.nz)>; Mel Rae <[Mel.Rae1@mfe.govt.nz](mailto:Mel.Rae1@mfe.govt.nz)>; Matthew Everett <[Matthew.Everett@mfe.govt.nz](mailto:Matthew.Everett@mfe.govt.nz)>; Isobel Bruun-Kiaer <[Isobel.Bruun-Kiaer@mfe.govt.nz](mailto:Isobel.Bruun-Kiaer@mfe.govt.nz)>; Lydia Marston <[Lydia.Marston@mfe.govt.nz](mailto:Lydia.Marston@mfe.govt.nz)>; Charlotte Harris-Miller <[Charlotte.Harris-Miller@mfe.govt.nz](mailto:Charlotte.Harris-Miller@mfe.govt.nz)>; Katherine Durman <[Katherine.Durman@mfe.govt.nz](mailto:Katherine.Durman@mfe.govt.nz)>; Allison Rokke <[Allison.Rokke@mfe.govt.nz](mailto:Allison.Rokke@mfe.govt.nz)>

**Subject:** [IN-CONFIDENCE]RE: [Feedback due COP 7 August] Draft Cabinet paper for departmental consultation - Scope, approach, timeframes and accountability for delivering the second emissions reduction plan

**CAUTION:** The sender of this email is from outside Waka Kotahi. Do not click links, attachments, or reply unless you recognise the sender's email address and know the content is safe.

Kia ora ERP Managers,

On 24 July I committed to sending you the second draft of this Cabinet paper, the second draft went to Minister Shaw this morning so I am now circulating it with you. We will also share this updated version with ERP directors.

As before, please provide any feedback to myself ([Freya.farrar@mfe.govt.nz](mailto:Freya.farrar@mfe.govt.nz)) and Stephen Goodman ([Stephen.goodman@mfe.govt.nz](mailto:Stephen.goodman@mfe.govt.nz)) by **COP Monday 7 August**.

section 9(2)(g)(i)

We are still working to the timeline included the email below, and are working towards Ministerial consultation beginning at the end of this week.

Please let me know if you have any questions.

Ngā mihi,

Freya

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**From:** Freya Farrar

**Sent:** Monday, July 24, 2023 5:19 PM

**Subject:** [Feedback due COP 7 August] Draft Cabinet paper for departmental consultation - Scope, approach, timeframes and accountability for delivering the second emissions reduction plan

Kia ora ERP Managers,

Please find attached a draft Cabinet paper seeking Ministerial agreement to the proposed scope, approach, timeframes and accountability for delivering the second emissions reduction plan. These decisions will guide policy work between now and December 2024.

**Departmental consultation will run from 24 July until 7 August**

As set out in the table below, the timeframes for progressing this Cabinet paper are tight. To maximise the opportunities for your input, we have attached a first draft. We provided this version to Minister Shaw last week and received an initial round of feedback this morning. We will address this feedback this week and will provide him with a second draft on 2 August. This updated draft will be circulated to you at the same time.

We will do our best to incorporate any early feedback into this second draft, but departmental consultation will officially close on Monday, 7 August.

Please provide your feedback to myself ([Freya.farrar@mfe.govt.nz](mailto:Freya.farrar@mfe.govt.nz)) and Stephen Goodman ([Stephen.goodman@mfe.govt.nz](mailto:Stephen.goodman@mfe.govt.nz)) by **COP Monday 7 August**.

Date	Action
24 July	First draft of Cabinet paper sent to Directors
	Departmental consultation begins (early feedback will be incorporated into the second draft of paper due to Minister Shaw 2 August)
28 July	Interagency Directors meeting (may test a drafted accountabilities section)
2 August	Second draft of Cabinet paper to Minister Shaw (am)
	Second draft of Cabinet paper sent to agencies (am)
4 August	Ministerial consultation begins
2 August	Departmental consultation closes
14 August	Ministerial consultation closes
15/16 August	Briefing containing final version of Cabinet paper seeking approval for lodgement
17 August	Lodgement
23 August	Consideration at DEV
28 August	Consideration at Cabinet

This version of the paper will also be sent to ERP Directors, who may discuss the paper in their weekly meeting on Friday 28 July.

**More information about a systems approach**

I would also like to share a small amount of key context on the systems proposed in the paper, as we know that it represents a different way of working than during development of the first plan.

- The systems approach has been developed as a way of cutting across sectors and acknowledging the many links between work programmes and policies.
- The approach as set out in the paper has been discussed by Directors, and endorsed by DCEs.

Please let me know if you have any questions.

Ngā mihi,

**Freya Farrar (she/her)**

Policy Analyst | Kaitātari

Climate Change - Kaupapahere Whakamauru (Transition Team)

Ministry for the Environment | Manatū Mō Te Taiao

[freya.farrar@mfe.govt.nz](mailto:freya.farrar@mfe.govt.nz) | [mfe.govt.nz](https://mfe.govt.nz)

*Ministry staff work flexibly by default. For me, this means I work during the day from Monday – Thursday, I have every other Friday off.*



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## Ken Ng

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**From:** Lisa Rossiter  
**Sent:** Thursday, 5 October 2023 4:53 pm  
**To:** Holly Walker; Jared Humm  
**Cc:** Rebekah Rennell  
**Subject:** Waka Kotahi feedback to CCC re: advice on ERP 2 - FYI  
**Attachments:** NZT-8890 Dr Rodd Carr.pdf

Kia ora Holly and Jared

Our Board met with Dr Rod Carr and Barry Anderson from the Climate Change Commission last week to discuss the Commission's draft advice. As a follow-up to that meeting, the points raised with the Commission are contained in the attached letter.

If MoT has provided feedback to the Commission on their draft advice we would appreciate having visibility of that.

One thing to be aware of was that Dr Carr asked the Board to 'sort out the RUC problem with heavy vehicles so that freight mode shift to rail and coastal shipping can be accelerated'. He shared with the Board his view that heavy vehicles are currently underpaying by a factor of four when their full impacts are taken into account. We are currently trying to establish the basis of this comment. Best that you are also aware, since RUC charges sit within MoT's remit.

Nga mihi nui  
Lisa

**Lisa Rossiter** (she/her)

**Senior Manager Environment and Sustainability | Kaiwhakehaere Mātua Whakauka me te Taiao**

System Leadership - Haumarū Taiao

Email: [lisa.rossiter@nzta.govt.nz](mailto:lisa.rossiter@nzta.govt.nz)

Mobile: [section 9\(2\)\(a\)](#)

**Waka Kotahi** NZ Transport Agency

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[www.nzta.govt.nz](http://www.nzta.govt.nz)

5 October 2023

Dr Rodd Carr  
Chair  
He Pou Rangi | Climate Change Commission  
roderick.carr@climatecommission.govt.nz

Ref: NZT-8899

Tēnā koe Dr Carr

**Waka Kotahi feedback in response to the Climate Change Commission's draft recommendations for the second Emissions Reduction Plan**

Thank you for taking the time to meet with the Waka Kotahi NZ Transport Agency Board on 28 September 2023 regarding the Commission's draft recommendations for the second Emissions Reduction Plan.

Waka Kotahi reiterates its strong commitment to reducing transport emissions and adapting to climate change through the purpose, priorities, functions, and resources set by Government for Waka Kotahi. The Avoid Shift Improve framework that underpins the Commission's transport advice for the current and next Emissions Reduction Plan is embedded in our business. We are actively working on all fronts for a sustainable transport system, recognising the many benefits this brings.

Waka Kotahi supports the strategic direction and intent of the Commission's draft recommendations. We would also like to suggest some amendments and additions to strengthen the advice.

**Draft Recommendation 10: Implement an integrated planning system that builds urban areas upward and mixes uses while incrementally reducing climate risks.**

Waka Kotahi supports this recommendation, noting that compact, mixed-use urban form is critical for enabling a low carbon transport system.

Our challenge is that we do not make urban development decisions and there are potential tensions between Government priorities to provide more housing and Government priorities to reduce transport emissions. Current planning and transport instruments are not well aligned, and effective mechanisms to resolve tensions are lacking. Waka Kotahi considers that expediting shared policy settings and targets between the transport and built environment sectors would support better urban and transport outcomes.

**Suggested addition to CCC draft recommendation 10:**

Government to ensure the transport and built environment sectors align current policy settings and jointly create future policy settings and targets; and implement practical mechanisms for resolving conflicts between housing, development, and transport emission reduction priorities.

**Draft Recommendation 16: Simplify planning and increase funding of integrated transport networks that optimise public and active transport. For major population centres, the Government should also complete cycleway networks by 2030 and take steps to complete rapid transport networks by 2035.**

Waka Kotahi strongly supports the advice to simplify planning and increase funding. Progressing cycleways and rapid transit within the timelines indicated is not feasible under current settings. We recommend some changes to sharpen the recommendation with respect to cycleways and broaden it with respect to public transport. We also recommend referencing urban programmes to reduce the need to travel by car and support mode shift currently under development for Tier 1 urban areas. Development of these programmes is an action from the first emissions reduction plan, funded through the Climate Emergency Response Fund. These programmes will direct available funding for cycleways, public transport, and demand management activities in the right sequence at the right time.

**Suggested change and additions to CCC draft recommendation 16:**

Replace with: For major urban areas by 2030, the Government should implement the key networks identified in city-wide cycleway programme business cases and increase funding to improve the reach and frequency of public transport; secure funding for and take steps to complete rapid transit networks by 2035. Note that timing and sequence of interventions is to be guided by urban programmes developed under the first Emissions Reduction Plan to reduce the need to travel by car and increase uptake of active and shared modes.

**Draft Recommendation 17: Rapidly resolve the barriers to scaling up vehicle charging infrastructure**

Waka Kotahi supports this recommendation. We note that the Commission discusses issues associated with electric vehicle (EV) supply (particularly used EVs) and affordability, but no recommendation is made. We consider matters of EV supply and affordability for middle and low-income earners are significant additional barriers to EV uptake at scale, alongside charging facilities.

- Upfront capital costs are likely to remain a barrier. Over 2 million income-earners over 18 earn under \$70,000 pa<sup>1</sup> and are unlikely to be able to afford an EV based on lower total cost of ownership. The majority of EV uptake to date has been from higher income households buying new vehicles.
- Supply of new EVs is expected to be unconstrained by 2030. This does not address our historical reliance on cheaper second-hand imports, and sourcing these vehicles will be challenging as noted in the CCC's advice.<sup>2</sup>

**Suggested additions to CCC draft recommendation 17:**

Introduce initiatives to increase the supply of new and used light EVs; Design targeted policies to incentivise uptake of light EVs for middle and low-income NZ, e.g., tiered rebates and concessionary financing options.

<sup>1</sup> The Cost of Living Payment (COLP) applies to 2.1 million people over the age of 18 and with net income less than \$70,000 in the 2021/22 tax year. [Office of the Auditor General - COLP](#)

<sup>2</sup> [Resource Economics, Review and analysis of electric vehicle supply and demand constraints](#) (March 2021), pp.i-ii.

**Draft Recommendation 18: Develop incentives to accelerate the uptake of zero emission commercial vehicles, including vans, utes, and trucks**

Waka Kotahi supports this recommendation, particularly the focus on a wide set of commercial vehicles. We note that current policy intentions focus on heavy vehicles. Other jurisdictions have adopted a 'beachhead' approach, staging decarbonisation by focusing on parts of the market where solutions are available ahead of parts of the market (like heavy vehicles), where solutions are developing.

We also note that incentives being considered for heavy vehicle EV uptake include rebates and Road User Charge (RUC) exemptions. We consider concessionary finance is better suited to commercial entities and more financially sustainable.

**Suggested additions to CCC draft recommendation 18:**

Adopt a beachhead approach to decarbonising commercial vehicles by prioritising parts of the market able to transition now, ahead of parts of the market where solutions are developing; Utilise concessionary financing to incentivise decarbonisation of commercial entities and support the financial sustainability of incentive schemes.

In addition to the matters above, we note that the Commission's draft advice discusses funding and financing but makes no recommendation. Waka Kotahi would like to see one included. Sufficiency of funding to enable a low carbon and climate resilient transport system is critical. The current Emissions Reduction Plan and National Adaptation Plan contains expectations of increased scale and pace of funding, yet current funding, financing and revenue settings are not optimally positioned. Blended or concessional financing, new transport pricing tools and an expedited review of the transport revenue system are potential options to recommend to Government for the second Emissions Reduction Plan.

Thank you once more for your time and the opportunity to provide feedback on this important advice.

Ngā mihi



**Nicole Rosie**  
Chief Executive  
Waka Kotahi NZ Transport Agency

Cc. Barry Anderson  
GM Sector Analysis  
Climate Change Commission  
By email: [barry.anderson@climatecommission.govt.nz](mailto:barry.anderson@climatecommission.govt.nz)



## Ken Ng

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**From:** Rebekah Rennell  
**Sent:** Monday, 25 March 2024 12:16 pm  
**To:** Sydney Van Nortwick  
**Subject:** RE: ERP2 consultation outline- feedback requested  
**Attachments:** Feedback on consultation chapter 25 March.docx

**Importance:** High

Hi Sydney,

Pretty close to noon as it turned out ! Attached some feedback from NZTA, thought better in a document than notes on the chapter itself. Have kept close to the brief for feedback in this train (i.e. barriers etc.).

I have noted in the attachment, regarding specific regulatory barriers (particularly if the SPTF is to be reviewed) we would need more time to consider. That being said, acknowledge this is a chapter for consultation rather than specific interventions already shaped up.

Hope this makes sense, if anything needed to be unpacked further please let me know.

Good luck with the timeframes !

Mihi Nui  
Rebekah

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**From:** Sydney Van Nortwick <[S.VanNortwick@transport.govt.nz](mailto:S.VanNortwick@transport.govt.nz)>  
**Sent:** Monday, March 25, 2024 11:02 AM  
**To:** Rebekah Rennell <[Rebekah.Rennell@nzta.govt.nz](mailto:Rebekah.Rennell@nzta.govt.nz)>  
**Subject:** RE: ERP2 consultation outline- feedback requested

Hi Rebekah,

I think that (afternoon today) will be fine- thanks for letting me know your timeline!

Ngā mihi, Sydney

**Sydney Van Nortwick** (*she/her*)

E: [s.vannortwick@transport.govt.nz](mailto:s.vannortwick@transport.govt.nz) M: **section 9(2)(a)**



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Enabling New Zealanders to flourish

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**From:** Rebekah Rennell <[Rebekah.Rennell@nzta.govt.nz](mailto:Rebekah.Rennell@nzta.govt.nz)>  
**Sent:** Monday, March 25, 2024 8:17 AM  
**To:** Sydney Van Nortwick <[S.VanNortwick@transport.govt.nz](mailto:S.VanNortwick@transport.govt.nz)>  
**Subject:** RE: ERP2 consultation outline- feedback requested

Hi Sydney,

I am checking in with PT team here RE regulatory barriers as the document references the operating model. I am waiting for their feedback – when do you need to return this to MFE ? Appreciate these deadlines not your own but is there are room on midday (can it be this afternoon?).

Cheers  
Rebekah

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**From:** Sydney Van Nortwick <[S.VanNortwick@transport.govt.nz](mailto:S.VanNortwick@transport.govt.nz)>  
**Sent:** Thursday, March 21, 2024 3:21 PM  
**To:** Rebekah Rennell <[Rebekah.Rennell@nzta.govt.nz](mailto:Rebekah.Rennell@nzta.govt.nz)>  
**Subject:** RE: ERP2 consultation outline- feedback requested

Thanks Rebekah!

**Sydney Van Nortwick** (*she/her*)  
E: [s.vannortwick@transport.govt.nz](mailto:s.vannortwick@transport.govt.nz) M: **section 9(2)(a)**



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**From:** Rebekah Rennell <[Rebekah.Rennell@nzta.govt.nz](mailto:Rebekah.Rennell@nzta.govt.nz)>  
**Sent:** Thursday, March 21, 2024 2:49 PM  
**To:** Sydney Van Nortwick <[S.VanNortwick@transport.govt.nz](mailto:S.VanNortwick@transport.govt.nz)>  
**Cc:** Erin Wynne <[e.wynne@transport.govt.nz](mailto:e.wynne@transport.govt.nz)>; Emission Reduction Plan 2 <[EmissionReductionPlan2@transport.govt.nz](mailto:EmissionReductionPlan2@transport.govt.nz)>  
**Subject:** RE: ERP2 consultation outline- feedback requested

Kia Ora Sydney

Thank you for sharing this draft – understand the scope is already quite clear, and the brief for feedback.

I will share with our ERP related team and develop some thoughts. RE the transport engagement, I will also start to compile some feedback from Waka Kotahi on stakeholders.

Mihi Nui  
Rebekah

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**From:** Sydney Van Nortwick <[S.VanNortwick@transport.govt.nz](mailto:S.VanNortwick@transport.govt.nz)>  
**Sent:** Thursday, March 21, 2024 2:09 PM  
**To:** Rebekah Rennell <[Rebekah.Rennell@nzta.govt.nz](mailto:Rebekah.Rennell@nzta.govt.nz)>  
**Cc:** Erin Wynne <[e.wynne@transport.govt.nz](mailto:e.wynne@transport.govt.nz)>; Emission Reduction Plan 2 <[EmissionReductionPlan2@transport.govt.nz](mailto:EmissionReductionPlan2@transport.govt.nz)>  
**Subject:** ERP2 consultation outline- feedback requested

Tēnā koe,

As you know we have been developing up content for the consultation document for the second emissions reduction plan. Included in this email is an outline of the transport content for the for you to comment on; this is only an early draft, and we will continue to reach out as this document and process shapes up.

The design of the content has been strongly guided by ministerial decisions based on manifesto documents and agreements, as well as a template designated by MfE.

When providing feedback it would be helpful if you could focus your comments around the following:

- What barriers (regulatory or otherwise) will need to be removed to enable emissions reductions across key pillar and supporting actions?
- What additional measures will be needed to enable emissions reductions across the key pillar and supporting actions?

In order to consider your comments for the draft, we will need your reply by noon **25 March 2024**. My apologies for the short turn around; we are working to tight timeframes. We also request that you only share this work as far as you need to.

If you would like the opportunity to meet for us to provide additional context please do let us know.

We will also be running transport engagement alongside the formal MfE engagement. We do not have dates or times for this yet, but we are actively building up our list of invitees. If you have stakeholders who should be included, please pass them along to Tracy ([T.Yandle@transport.govt.nz](mailto:T.Yandle@transport.govt.nz))

Ngā mihi nui, Sydney

**Sydney Van Nortwick** (*she/her*)  
Kaitohutohu | Adviser  
Te Rōpu Taiao | Emissions Reducation Plan II Project Team  
**Te Manatū Waka Ministry of Transport**  
E: [s.vannortwick@transport.govt.nz](mailto:s.vannortwick@transport.govt.nz) M: **section 9(2)(a)**



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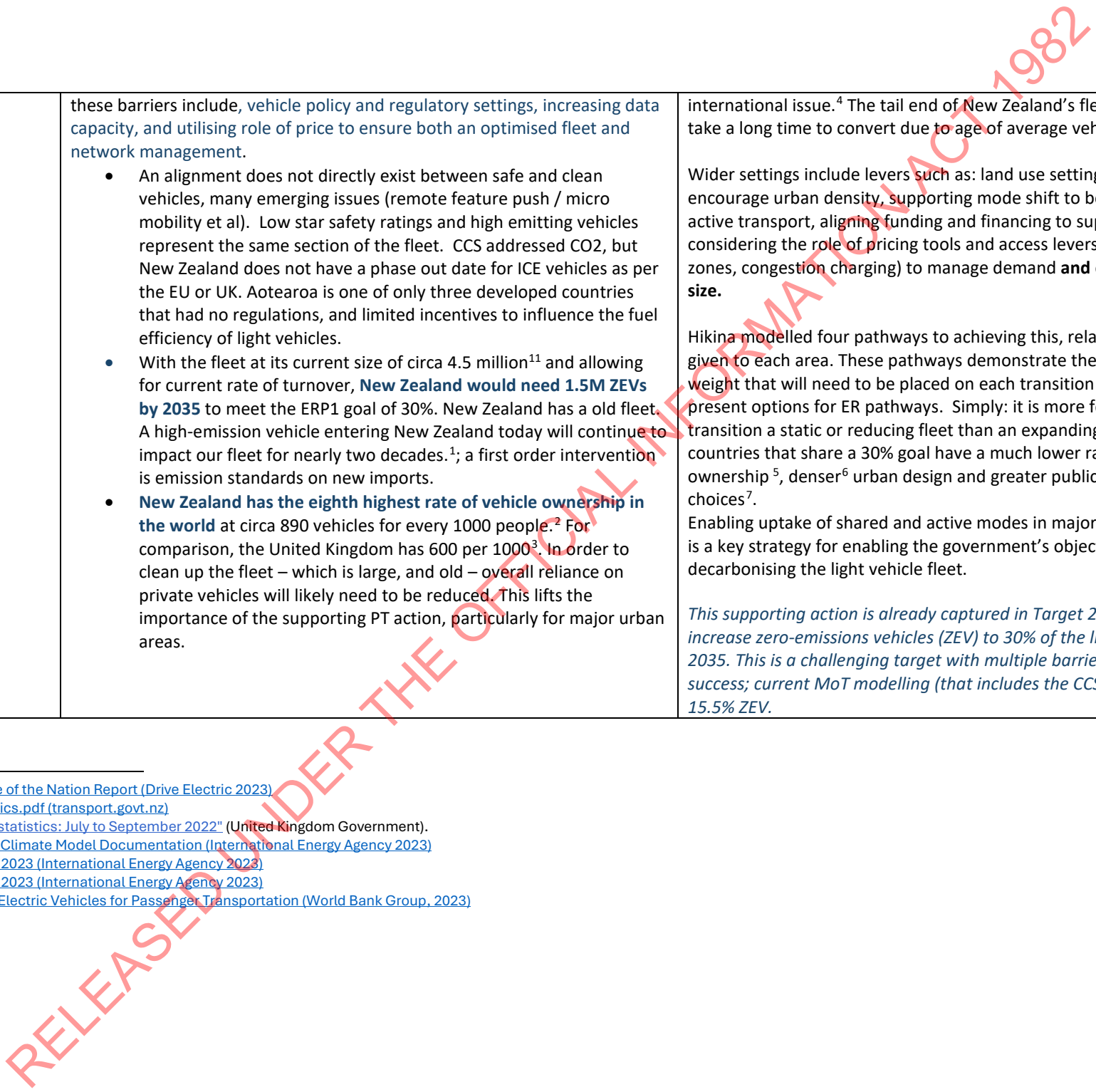
## Feedback on draft Transport Chapter for consultation: 25/03/2024

Below represents feedback from SMEs in NZTA – as requested limited circulation, this has been drawn from rationale on hand and feedback from a small number of policy and strategy SMEs. Comments on likely regulatory impacts are high level owing to this and time period and should be considered draft not policy.

	What barriers (regulatory or otherwise) will need to be removed to enable emissions reductions across key pillar and supporting actions?	What additional measures will be needed to enable emissions reductions across the key pillar and supporting actions?
<b>Comment on delivery of all pillars</b>	<p>The template outlines that each action will include: <i>who will be involved</i>. In the longer term as this advice matures (or post consultation), this should include which entity should deliver this and consider how this will be funded.</p> <p>A wider scope is most appropriate for a consultation document so that potential other interventions to support abatement are not excluded. E.g. Heavy vehicle decarbonisation could be approached as ‘light and heavy commercial vehicle fleet decarbonisation’ to allow a system view and include freight mode shift.</p> <p>Decarbonisation of the fleet involves multiple interventions, not solely the decarbonisation of the vehicles themselves.</p>	
<b>Key Pillar: EV Charging</b>	<p>Key barrier = electrical distribution infrastructure.</p> <p>Though out of scope for NZTA to give detailed commentary on, this is a major impediment recognised by other agencies and highlighted by ENA in submission processes.</p>	<p>Out of scope for NZTA to give detailed feedback on charging. Regarding the uptake of EVs to use charging infrastructure, see comments on supporting action.</p> <p>It will also be critical to consider freight / heavy vehicles in this strategy, see comments on supporting action; there is a need to address EV charging for lighter commercial vehicles.</p> <p>Need to address residential charging, including requirements for new residential developments.</p>
<b>Supporting Action: Aviation and Maritime Decarbonisation</b>	Out of scope for NZTA feedback.	–
<b>Supporting Action: Cleaning up the fleet</b>	Many barriers exist including emission standards for vehicles, and the high capital cost of EVs in the first order. Plausible short-term options to address	As the fleet is old and will need to be supported in its reduction, New Zealand will be presented with a ‘scrapage curve’; this is an

	<p>these barriers include, vehicle policy and regulatory settings, increasing data capacity, and utilising role of price to ensure both an optimised fleet and network management.</p> <ul style="list-style-type: none"> <li>• An alignment does not directly exist between safe and clean vehicles, many emerging issues (remote feature push / micro mobility et al). Low star safety ratings and high emitting vehicles represent the same section of the fleet. CCS addressed CO2, but New Zealand does not have a phase out date for ICE vehicles as per the EU or UK. Aotearoa is one of only three developed countries that had no regulations, and limited incentives to influence the fuel efficiency of light vehicles.</li> <li>• With the fleet at its current size of circa 4.5 million<sup>11</sup> and allowing for current rate of turnover, <b>New Zealand would need 1.5M ZEVs by 2035</b> to meet the ERP1 goal of 30%. New Zealand has a old fleet. A high-emission vehicle entering New Zealand today will continue to impact our fleet for nearly two decades.<sup>1</sup>; a first order intervention is emission standards on new imports.</li> <li>• <b>New Zealand has the eighth highest rate of vehicle ownership in the world</b> at circa 890 vehicles for every 1000 people.<sup>2</sup> For comparison, the United Kingdom has 600 per 1000<sup>3</sup>. In order to clean up the fleet – which is large, and old – overall reliance on private vehicles will likely need to be reduced. This lifts the importance of the supporting PT action, particularly for major urban areas.</li> </ul>	<p>international issue.<sup>4</sup> The tail end of New Zealand’s fleet will likely take a long time to convert due to age of average vehicle.</p> <p>Wider settings include levers such as: land use settings that encourage urban density, supporting mode shift to both public and active transport, aligning funding and financing to support this, considering the role of pricing tools and access levers (i.e., ZEV zones, congestion charging) to manage demand <b>and overall fleet size</b>.</p> <p>Hikina modelled four pathways to achieving this, relative to focus given to each area. These pathways demonstrate the relative weight that will need to be placed on each transition area and present options for ER pathways. Simply: it is more feasible to transition a static or reducing fleet than an expanding fleet; countries that share a 30% goal have a much lower rate of vehicle ownership<sup>5</sup>, denser<sup>6</sup> urban design and greater public transport choices<sup>7</sup>.</p> <p>Enabling uptake of shared and active modes in major urban areas is a key strategy for enabling the government’s objective of decarbonising the light vehicle fleet.</p> <p><i>This supporting action is already captured in Target 2 of ERP1 – to increase zero-emissions vehicles (ZEV) to 30% of the light fleet by 2035. This is a challenging target with multiple barriers to its success; current MoT modelling (that includes the CCS) projects 15.5% ZEV.</i></p>
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<sup>1</sup> [Drive Electric State of the Nation Report \(Drive Electric 2023\)](#)  
<sup>2</sup> [AnnualFleetStatistics.pdf \(transport.govt.nz\)](#)  
<sup>3</sup> ["Vehicle licensing statistics: July to September 2022"](#) (United Kingdom Government).  
<sup>4</sup> [Global Energy and Climate Model Documentation \(International Energy Agency 2023\)](#)  
<sup>5</sup> [Global EV Outlook 2023 \(International Energy Agency 2023\)](#)  
<sup>6</sup> [Global EV Outlook 2023 \(International Energy Agency 2023\)](#)  
<sup>7</sup> [The Economics of Electric Vehicles for Passenger Transportation \(World Bank Group, 2023\)](#)



<p><b>Supporting Action: Public Transport, particularly in our main cities</b></p>	<p>NZTA will need further time to comment on barriers (regulatory and otherwise) to proposed review of the sustainable public transport framework mentioned in the draft chapter. NZTA would need to be heavily involved in this if progresses, and would be able to participate giving effect to it through operational policy.</p>	<p>Ideally the review of the SPTF could include funding models that recognise PT infrastructure and services as a revenue generating asset, beyond the current approach to fare box recovery.</p> <p>Ways of better utilising PT include enabling more commercial development around/above/beneath PT hubs (this might already be enabled...check with PT folk); and of course the park and ride, walking, cycling, scooting connections to PT.</p>
<p><b>Proposed for inclusion as a supporting action: Heavy Vehicle Decarbonisation</b></p>	<p>This would be more inclusive of all ER opportunity if it was ‘Commercial and Heavy Vehicle Decarbonisation’ or ‘light and heavy commercial decarbonisation’. This would recognise that lighter delivery and commercial vehicles are ‘low hanging fruit’ if following a beach had approach (i.e. as per the IRU). <i>i.e. to focus interventions where technology exists now and have a staged approach.</i></p> <p>Amendment of regulations presenting barriers for the uptake of low and zero emission heavy vehicles.</p> <p>The high capital cost of heavy vehicles is a key barrier, as with light vehicles. Other technologies exist that will likely play a key role in reducing emissions and will need to be considered in regulatory settings – i.e. not solely the prime mover vehicle but combinations; enabling this new trailer technology without changing classifications.</p> <p>Driver licensing may need to be reconsidered due to weight of battery technology; i.e. increasing a class 1 weight limit.</p>	<ul style="list-style-type: none"> <li>• <b>If VDAM is to be reviewed it is important to highlight the additional damage</b> this will cause to the network, to look at heavy EV RUC exemptions, and to consider new RUC classes to recoup this damage.</li> <li>• <b>Reducing emissions overall in freight will require a systems approach:</b> Freight in our major centres is overwhelmingly transported by road (i.e., in Auckland, 95%<sup>8</sup>).</li> <li>• <b>70% of NZ freight is short distance trips;</b> this is an obvious place to focus interventions in emission reduction plans. Daily in Auckland alone, over 1000 couriers make circa 120000 deliveries<sup>9</sup>.</li> <li>• There are significant opportunities for emission reduction <b>even by utilising high productivity motor vehicles and recent European emission standards.</b> New Zealand recently joined 14 other countries in signing a Memorandum of Understanding committing to 30% ZEHV uptake (trucks and buses) by 2030, and 100% by 2040<sup>10</sup>.</li> <li>• <b>There is a significant price barrier to conversion.</b> While the total cost of ownership may be competitive<sup>11</sup> for depot based light trucks, a large capital investment in the vehicle and charging infrastructure is still required. This</li> </ul>

<sup>8</sup> [Auckland Freight Plan \(Auckland Council 2020\).](#)

<sup>9</sup> [Auckland Freight Plan \(Auckland Council 2020\).](#)

<sup>10</sup> [Memorandum of Understanding on Zero-Emission Medium- and Heavy-Duty Vehicles \(Calstart 2023\).](#)

<sup>11</sup> [Charging forward: trialling battery electric trucks in your fleet | EECA](#)

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		<p>presents a large barrier to uptake. 75% of New Zealand trucking businesses are SMEs that operate five trucks or fewer<sup>12</sup>.</p> <ul style="list-style-type: none"> <li>• Interventions available are manifestly different to light fleet transition; they have a commercial context, and it is potentially easier to address than wider light fleet issues of equity et al. if there was the capacity to address the capital cost with concessional financing from Crown.</li> <li>• Transporting New Zealand has launched its own strategy for decarbonisation, The Green Compact<sup>13</sup>, which is based on and developed with the IRU Green Compact. This is based on a beachhead approach – i.e. to focus interventions where technology exists now and have a staged approach.</li> </ul>
<p>Comment on 'Understanding impacts and benefits'</p>	<ul style="list-style-type: none"> <li>• The section 'supporting the sector to adapt' seems to be conflating two kinds of 'adapting' (1) helping the sector to adapt (or better word, transition) to a low a low emission system; (2) helping the system adapt to the impacts of climate change. These are two related but different things. The pillar and supporting actions on the whole will support significant but also partial decarbonisation of the transport system and the transition to a low emission system. But the high emphasis on vehicle transition and less emphasis on PT and other modes will reduce the diversity of the system and its ability to adapt to climate change impacts, particularly in major urban areas.</li> <li>• The claim that electrification will significantly lower costs may be true under current system revenue and funding settings – but that energy based system is unlikely to underpin the future transport revenue and funding system, which may be related to distance/weight etc. Given the immense needs of the transport system for climate resilient infrastructure and services – costs of vehicle ownership and use may over time increase.</li> </ul>	

<sup>12</sup> [Transporting New Zealand \(December 2023\).](#)

<sup>13</sup> [The Green Compact \(Transporting New Zealand 2023\).](#)

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# out of scope

**From:** Jannette Farley  
**Sent:** Wednesday, May 15, 2024 1:53 PM  
**To:** David Eyre <[d.eyre@transport.govt.nz](mailto:d.eyre@transport.govt.nz)>  
**Subject:** ERP2 Consultation Document\_Some comments

Kia ora Danny

Great to talk with you today.

I've attached some informal comments from our ERP2 folk on the draft ERP2 Transport consultation section for you to consider if you are able.

Comments relate to some points of clarification (public charging); some messaging, particularly around VDAM and adaptation; identifying items where stakeholders may ask for evidence, modelling and assumptions (ETS, EV uptake); and some broader connections to make on data, (EV Roam), Revenue Review and RUC and the interplay of climate vs non-climate policies.

 [MOT response MOT Transport Content\\_NZTA.docx](#)

On the wider issue of global financial funding opportunities - I found the **Reserve Bank** comments in one of the CCEB minutes interesting.



I'm assuming you have these. They are in confidence, so I won't cut and paste...In your email, go to the following:

**From:** Kate Alderslade <[Kate.Alderslade@climateieb.govt.nz](mailto:Kate.Alderslade@climateieb.govt.nz)>

**Sent:** Wednesday, May 8, 2024 1:01 PM

**Subject:** [IN-CONFIDENCE]IIWG update on CE Board pack & CCCEB Draft May Q-Report

There were two attachments. Go to attachment [20240510 Administration Paper](#);  
Notes from 3 April, Item 2. Following item 3 from Climate Business Advisory Group is also useful.

On Green Taxonomy:

You may have seen this vis (EU) taxonomy as applied to roads : [TÍTULO Lorem ipsum dolor sit amet, consectetur adipiscing elit. Aenean commodo ligula eget dolor. Aen \(seopan.es\)](#)

This may be of interest: [Common Principles for Climate Mitigation Finance Tracking \(adb.org\)](#)

Apologies if already have these.

Feel free to contact me if you need anything swiftly.

Ngā mihi

J

## Jannette Farley

Principal Advisor, Strategy: Environment and Sustainability

System Leadership

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Link to: [www.journeys.nzta.govt.nz](http://www.journeys.nzta.govt.nz)

# out of scope

**From:** Jannette Farley  
**Sent:** Monday, May 20, 2024 9:47 AM  
**To:** David Eyre <[d.eyre@transport.govt.nz](mailto:d.eyre@transport.govt.nz)>  
**Subject:** ERP2 Transport, nature based solutions and resilience

Mōrena Danny

When we met on Wednesday, I asked if **nature based solutions (NBS)** were being discussed in any other parts of ERP 2. Subsequently at the cross-Agency meeting on Thursday, it looked like NBS had become one of the five priority areas (alongside clean energy, credible markets, world leading climate innovation and resilient infrastructure). This seemed to have been a surprise development for the team during that meeting!

While aware a lot of water is yet to go under proverbial bridges, there are very important opportunities to be made across transport, nature-based solutions and resilient infrastructure: for transport, NBS offer both mitigative and adaptive benefits, for infrastructure, but also for communities, and the environment (think what we plant and where for carbon sequestration, habitat protection, and flood protection, slope stability, coastal erosion - use of wetlands for flooding etc). NBS can help to avoid or reduce the impact of severe events, and make recovery quicker. This goes somewhat beyond building future fit culverts. Apologies if you are already well across this.

At the moment, it feels like (please correct me if I'm wrong), that Transport is very much in the 'Clean Energy' space; NBS looks to just be primarily about mitigation, commercial opportunities, ecosystems - link to transport not yet made ; while 'Resilient infrastructure' seems to focus on adaptation framework, information and RMA Reform) - which is pretty broad. I'm sure these will develop.

The point is that a truly system approach that brings mitigation, adaptation and nature-positive together lands in the transport space **if transport is enabled** to include NBS in its considerations for infrastructure maintenance, operations, renewals and improvements - **the strongest enablement (for NZTA and local government) would be via signals in the GPS Land Transport. The current draft doesn't do this. If this area has merit, then some fairly swift joining up with GPS folk may be required - may also be required at higher levels.** Alternatively, other mechanisms with funding attached would need to be identified.

NZTA has quite a lot of experience in this space, and provided a lot of information for ERP1. It may be that colleagues in MfE, and also MoT may benefit from making the connections - and it is a win win win scenario for government. We would be happy to provide support.

I've attached a document provided to MoT in 2022 for ERP1 - noting that ERP2 signals a different approach. However, it may be useful. **Please let me know if you share it - as it may need updating.** It is clearly marked as a 2022 document, not NZTA policy and for discussion only - it reflects an earlier, time. [20220909 NbS Summary for MoT - Copy.docx](#)

Ngā mihi

## Jannette Farley

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**From:** Tracy Yandle <[T.Yandle@transport.govt.nz](mailto:T.Yandle@transport.govt.nz)>

**Sent:** Tuesday, June 25, 2024 9:08 AM

**To:** Official Correspondence <[Official.Correspondence@nzta.govt.nz](mailto:Official.Correspondence@nzta.govt.nz)>

**Cc:** Jannette Farley <[Jannette.Farley@nzta.govt.nz](mailto:Jannette.Farley@nzta.govt.nz)>; Rob Hannaby <[Rob.Hannaby@nzta.govt.nz](mailto:Rob.Hannaby@nzta.govt.nz)>

**Subject:** RE: Draft ERP 2 Discussion Document for agency consultation

Kia ora koutou,

Thank you so much for your quick and thoughtful response. We very much appreciate the feedback and your continued support.

Ngā mihi nui!  
Tracy

**Tracy Yandle (She/Her/Dr.)**

Kaitohutohu Matua, Te Rautaki Rōpu Taiao

Senior Adviser – Second Emission Reduction Plan Project Team

**Te Manatū Waka - Ministry of Transport**

M: [section 9\(2\)\(a\)](#) [t.yandle@transport.govt.nz](mailto:t.yandle@transport.govt.nz)



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**From:** Official Correspondence <[Official.Correspondence@nzta.govt.nz](mailto:Official.Correspondence@nzta.govt.nz)>  
**Sent:** Tuesday, June 25, 2024 8:19 AM  
**To:** Tracy Yandle <[T.Yandle@transport.govt.nz](mailto:T.Yandle@transport.govt.nz)>  
**Cc:** Jannette Farley <[Jannette.Farley@nzta.govt.nz](mailto:Jannette.Farley@nzta.govt.nz)>; Rob Hannaby <[Rob.Hannaby@nzta.govt.nz](mailto:Rob.Hannaby@nzta.govt.nz)>  
**Subject:** RE: Draft ERP 2 Discussion Document for agency consultation  
**Importance:** High

Tēnā koe Tracey

Thank you for the opportunity to provide feedback on the draft Transport chapter of the ERP2 public consultation document.

Our only feedback is to ask that you ensure the public transport content of this draft aligns with the messaging in the draft GPS on land transport, as this is what guides investment decisions. While it is broadly aligned, we would note that “shifting demand from more emissions-intensive transport modes to cleaner energy sources, such as electric trains, electric buses and electric ferries” is not a feature of the current draft GPS. We are also pleased to see some amendment to the VDAM section of the draft.

We will continue to support the Ministry where relevant, as it manages departmental and public feedback and finalises the transport component of the section Emissions Reduction Plan.

Ngā mihi  
Chloe

## Chloe Nugent

Team Leader Coordinators, Ministerial Services

Te Waka Kotuia | Engagement & Partnerships

NZ Transport Agency Waka Kotahi

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**From:** Tracy Yandle <[T.Yandle@transport.govt.nz](mailto:T.Yandle@transport.govt.nz)>  
**Sent:** Friday, June 21, 2024 12:25 PM  
**To:** Jannette Farley <[Jannette.Farley@nzta.govt.nz](mailto:Jannette.Farley@nzta.govt.nz)>  
**Cc:** Erin Wynne <[e.wynne@transport.govt.nz](mailto:e.wynne@transport.govt.nz)>  
**Subject:** Draft ERP 2 Discussion Document for agency consultation

Tēnā koe Jannette ,

As you know we have been developing the consultation document for the second emissions reduction plan. Included in this email is the agency consultation draft of the transport. **Please keep this document in confidence.** This document has only just gone out for wider departmental and ministerial consultation, and we apologise for the tight timeframe. **In order to consider your comments, we will need your reply by COP Monday 24 June 2024.**

If you have any substantive comments, we would be happy to discuss them with you on Monday. Similarly, we are happy to discuss next steps, including formal consultation.

Ngā mihi nui  
Tracy

**Tracy Yandle (She/Her/Dr.)**

Kaitohutohu Matua, Te Rautaki Rōpu Taiao  
Senior Adviser – Second Emission Reduction Plan Project Team

**Te Manatū Waka - Ministry of Transport**

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