



Submission to the Climate Change Commission on Draft Advice on the second emissions reduction plan (2026-2030)























EMISSIONS IN NEW ZEALAND













































































































































































































































































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Contents

l	Executive Summary	2
II.	SBC/CLC Pre-election briefing paper recommendations	4
III.	Commission's draft advice: Fundamentals for success	6
	Policy frameworks	6
	Prioritisation framework	6
	Pathway to achieving budgets	6
	Role of business	7
	Skills	7
	Gross/net	7
	Emissions Pricing	9
	Hard to abate sectors and the NZ ETS	9
IV.	Gaps in the Commission's advice	11
	Enabling system transformation	11
	Nature	11
V.	Creating low emissions options	13
	Waste	13

I. Executive Summary

The Sustainable Business Council (SBC) and Climate Leaders Coalition (CLC) are pleased to submit this joint response to the Climate Change Commission's consultation on its draft advice to government on the second emissions reduction plan.

Alongside this covering letter, we would like to submit the joint SBC/CLC <u>Pre-election briefing paper: Policy priorities for accelerating climate action and building a resilient Aotearoa</u>. Together these documents set out what we believe is required to accelerate our emissions reductions and address adaptation so we can secure a climate-resilient, net-zero future where people thrive.

This document represents the collective views of the members of SBC and CLC, a group of more than 160 businesses who contribute more than 40 percent of Aotearoa New Zealand's GDP. SBC is part of BusinessNZ, Aotearoa New Zealand's largest business organisation.

We recognise climate change, social wellbeing and biodiversity loss are inextricably linked and must be addressed together. Set out in the SBC/CLC pre-election briefing are the following 10 broad recommendations (broken down into more detailed points later in this document):

- 1. Maintain and uphold the climate change response architecture
- 2. Accelerate action on climate adaptation while reducing emissions
- 3. Accelerate transport decarbonisation in both the light and freight fleets
- 4. Increase investment in infrastructure for decarbonisation and electrification
- 5. Maintain momentum to reduce agriculture emissions
- 6. Accelerate action to ensure a just transition
- 7. Decarbonise industrial processes (especially process heat)
- 8. Reduce emissions from waste and the built environment
- 9. Implement a national sequestration strategy that protects nature
- 10. Improve the disclosures framework

Taken together these will reduce New Zealand's emissions in line with our net zero targets and will prepare Aotearoa for the significant shifts in our climate.

We have chosen these actions based on how much they will contribute to emissions reduction. We have elevated climate adaptation, given how much work is required to build momentum in this area and recognising the interaction between adaptation and mitigation. Crucial to these recommendations is also a focus on a just transition, and the need to put people firmly at the heart of the enormous task before us.

In addition to this, the areas we are particularly highlighting in this submission include the following:

- We support the framework adopted by the Commission, but call on it to more clearly identify the role that the climate change architecture, established with broad political support, will play in providing businesses with the necessary certainty to make the investment required to transition.
- Transparency is key to understanding whether New Zealand is going to meet the first and subsequent emissions budgets. Any shortfall in the first budget has implications for future budgets, and this pressure is felt by all, including the businesses involved in the transition. This submission outlines the importance of continued support for effective policies, technologies and transition options that will enable Aotearoa to reach the goals it has set.

- SBC/CLC support the Commission's call for greater clarity and focus on the role that reducing
 gross emissions can play as we aim for net zero. We note with concern the risks raised by the
 Commission around the New Zealand Emissions Trading Scheme, particularly in regard to its
 potential failure to drive gross emissions reductions, but rather afforestation. Members are, as
 relevant, engaging with the Government on changes.
- We emphasise the need to identify areas for genuine and enduring partnership between the
 public and private sector. Government must ensure the necessary regulatory frameworks and
 complementary measures required are quickly put in place to ensure business can continue to
 invest in their transition at the pace required of them. We urge the Commission to include
 greater consideration of the role that business can play, as well as recognising the opportunity to
 address the skills required for the transition.
- SBC/CLC recognise that iwi/hapū are best placed to comment on how they wish to demonstrate climate change leadership. We have not taken a specific position as member-led organisations on the recommendations made by the Commission in this area.
- Nature provides critical solutions for both mitigation and adaptation, and it must be protected or enhanced through our climate action. Based on this, we encourage the Climate Change Commission to consider further what role nature could play in the final version of its advice. We also encourage the Commission to consider the role of technology and have made recommendations around waste.

The second Emissions Reduction Plan will provide the enduring pathways required to achieve the country's net zero commitments, as well as the certainty our businesses need to continue to invest in their own decarbonisation and climate-resilience journeys. We know neither business nor government can do this alone, and both have crucial roles to play.

SBC/CLC would welcome the opportunity to discuss this submission with the Climate Change Commission.

II. SBC/CLC Pre-election briefing paper recommendations

Please consider the attached <u>Pre-election briefing paper: Policy priorities for accelerating climate action and building a resilient Aotearoa</u> as part of the SBC/CLC submission. This pre-election priorities paper, from April 2023, represents the latest thinking from SBC/CLC members on options to accelerate emissions reductions and address adaptation needs. The document makes a series of recommendations, details of which can be found from page 37 onwards.

In summary, CLC/SBC recommend actions that will enable business to go further, faster to reduce their emissions while working with the government to provide clear direction and partnership on climate adaptation. These include:

1.	Maintain and uphold the climate change response architecture	1.1	Commit to maintain and uphold the climate change response architecture.
	. Accelerate action on climate adaptation while maintaining momentum in reducing emissions	2.1	Accelerate action on both emission mitigation <i>and</i> proactive climate adaptation, by also considering nature-based solutions to adaptation
2.		2.2	Work with business and local government to provide greater clarity on short and long-term direction on adaptation
۷.		2.3	Urgently review the size and scope of funding plus roles and responsibilities required to support climate change adaptation
		2.4	Implement the Infrastructure Commission's recommendations on strengthening resilience to shocks and stresses
		2.5	Partner with business to take immediate action in areas already impacted by climate change
	Accelerate transport decarbonisation in light and freight fleets	3.1	Implement actions to accelerate decarbonisation of light passenger travel through electrification and mode shift, with a particular focus on charging infrastructure capacity and alignment with EU standards
3.		3.2	Implement actions to decarbonise heavy freight through optimisation of decarbonisation options, fuel switching and mode shift
		3.3	Prioritise investment in low and zero emissions rail and coastal shipping, two key sectors for enabling freight mode shift
		3.4	Develop and implement a strategy to decarbonise aviation
4.	Increase investment in infrastructure for decarbonisation and electrification	4.1	Prioritise completion of the New Zealand Energy Strategy and take a whole-of-system approach to complementary energy policies
		4.2	Amend regulatory settings to enable regulated infrastructure to support the decarbonisation of the economy

		4.3	Provide clear consenting pathways for energy infrastructure as part of
		4.5	the RMA reform
		4.4	Implement policy measures to incentivise the uptake of distributed renewable technologies
		4.5	Recognise the need for renewable energy certification
		5.1	Reduce agricultural emissions through the Centre for Climate Action joint venture
5.	Maintain focus on reducing agriculture emissions	5.2	Identify tools to help farmers transition to a low emissions economy and adapt to the changing climate
		5.3	Promote a nature-based solutions (NBS) approach to assessing the environmental impacts from agricultural practices
6.	Accelerate action to ensure a just transition	6.1	Complete the Equitable Transitions Strategy in 2023 and work with business and other stakeholders to ensure the Strategy is implemented
7.	Decarbonise industrial processes (especially process heat)	7.1	Decarbonise industrial processes (especially process heat) through the public-private action resulting from the GIDI fund
	Reduce emissions from waste and the built environment	8.1	Implement actions to support circular economy initiatives
		8.2	Improve waste recovery, recycling rates, and waste tracing
8.		8.3	Provide policy direction on organic waste as part of the Bioeconomy Strategy
		8.4	Reduce emissions and waste from the built environment through necessary amendments to the building code, requiring embedded carbon measurements and undertaking a large-scale retrofit programme
9.	Implement a national sequestration strategy that protects nature	9.1	Develop a national sequestration strategy that recognises the environmental, social, and economic benefits of a well-balanced use of sequestration as a mitigation tool
	. Improve the disclosures framework	10.1	Ensure climate scenario assumptions are used consistently for the purpose of climate disclosures
10.		10.2	Improve guidance on the disclosure of Scope 3 emissions
		10.3	Explore in partnership with business the introduction of Nature- related Financial Disclosures in the New Zealand market

III. Commission's draft advice: Fundamentals for success

Policy frameworks

SBC/CLC are supportive of a package of measures that puts Aotearoa New Zealand on track to meet its domestic and international commitments. We agree with the Commission (as set out in its policy diagram) that this means a combination of pricing and supportive policy measures.

The role of institutions in the transition should encompass action to maintain and uphold the climate change response architecture. Consistency in the climate response architecture is key to giving businesses the certainty they need to invest and innovate. It is critical these signals don't change, even if Governments do.

Prioritisation framework

SBC/CLC members are not in a position to interpret the legislation that governs issues the Commission must take into account when developing advice. However, we have reviewed the six principles set out in the advice (potential, gap, pace and timing, risks, equity and co-benefits) and consider this a reasonable prioritisation framework for the Commission to use.

The Commission has noted that "effective governance structures" are integral to the delivery of the transition. We are keen to understand how frameworks, like the one developed by the Commission and any developed by the government, are deployed in practice.

Frameworks used to prioritise actions and shape the implementation of policy sit underneath governance structures like the Climate Change Chief Executives Board. It is important that the elements of the climate change architecture, like the Board, are upheld. Transparency around how they operate, and incorporation of the voice of business (amongst others) is key to their success.

Pathway to achieving budgets

We thank the Commission for the transparency it has provided around the pathways to achieving emissions budgets. This clarifies how New Zealand is tracking towards meetings emissions budgets, a shared responsibility between government, business and others.

We are concerned that Aotearoa New Zealand is not currently on a pathway to achieve the first emissions budget. Failure to achieve the first budget would set a poor precedent for meeting future budgets and adds pressure to the pace of transition in the late 2020s and 2030s. The Commission has highlighted that Emissions Budgets 2 and 3 are progressively more ambitious and achieving them relies on actions in the first budget. This pressure will be felt by all involved in the transition, including SBC/CLC members.

We are aware that further information about how Aotearoa is progressing in terms of meeting budgets will be provided by the Commission through its monitoring work in 2024, alongside policy options to course correct. However, we are concerned that these options will come too late to materially affect Emissions Budget 1, and therefore have an impact on what is required for Emissions Budgets 2 and 3. Business has a role to play in meeting this first budget (and future budgets), but requires a coherent, well-signalled, stable, policy environment to do so.

We note the information provided regarding the impact of small delays in creating higher cumulative emissions. In light of the above, it is important that government continues to support the policy mechanisms that are delivering effectively on emissions reductions.

Actions like the business-government partnership to reduce agricultural emissions through the Centre for Climate Action (AgriZeroNZ) are important to support the effort to meet emissions budgets and targets. The government recently announced GIDI co-funding for NZ Steel to install an electric arc furnace, enabling them to decarbonise part of their operations. This is an example of government and industry working together within the existing framework to great effect.

We note that the Commission has not made a recommendation around EV uptake, ways to reduce existing vehicle fleet emissions, and fleet turnover rates. We consider this a relevant and important area, as meeting the second and third budgets relies on significant EV uptake, amongst other transport changes like mode shift, especially given policy changes which have impacted the feasibility of achieving the budget.

We strongly urge the Commission and Government to consider how to continue to support (as necessary) key underpinning technologies or transition options, with a view to the pace and scale of emissions reductions required. This includes the recommendations relating to transport (Recommendation 3) and energy (Recommendation 4) outlined in our <u>Pre-election briefing paper: Policy priorities for accelerating climate action and building a resilient Aotearoa.</u>

SBC/CLC members will continue to make choices and align investments to meet the budgets. This investment is considerable and relies on a stable policy environment.

Role of business

SBC/CLC members remain committed to an ambitious transition that takes place at a rate that recognises the urgency of this issue. We note the information given by the Commission in its advice regarding the impact of the transition on small to medium enterprises. However, we think that the advice would be stronger for including greater consideration of the role business can play in the transition to a low emissions economy.

There is a significant cost to delaying action on climate change that will fall on businesses, and customers. We would like to reinforce the importance of clear and consistent messaging and direction of travel on the transition. Our members are committed to investing in a low emissions transition, but as much as anything else this requires certainty. Cross-party support for emissions reductions, with an accompanying consistency on core policy or regulatory settings, is also required.

Skills

New Zealand has a limited number of trained and skilled specialists to carry out the necessary tasks to transition the economy to a low emission, resilient one. It is crucial to recognise the immediate need to upskill existing climate specialists, as we may struggle to attract a sufficient number of personnel to Aotearoa. Additionally, New Zealand should explore opportunities to enhance support for higher education programs that focus and train current and future generations in the requisite skills.

Gross/net

The Commission's draft advice included a recommendation to commit to a specific level of gross emissions reduction, and to align its policy choices accordingly. The Commission also recommended that the government communicate indicative levels of gross emissions reductions and carbon dioxide removals from forests.

SBC/CLC support the net zero target for 2050, which the advice from the Commission does not advocate changing. SBC/CLC also support the Commission's advice regarding greater clarity and focus on the role that reducing gross emissions can play as we aim to reach net zero. We support an explicit focus by the government on gross emissions reductions, which aligns with the commitments made by our members.

We understand the numbers specified for gross emissions reductions by the Commission align with work done on the Commission's demonstration pathway and subsequent work by the government to set sector goals (non-binding).

We consider the following critical in setting the levels of emissions reductions:

- Consideration of the pace of change, and how this may vary across sectors. Gross emissions reductions will be more feasible for some sectors than others.
- We are concerned about the scale of exotic afforestation witnessed over the past year, and note the issues raised by the Commission. The incentives for exotics are not aligned with achieving gross emissions reductions¹. In addition, we note extensive planting of exotics carries risk to meeting our climate, adaptation, and biodiversity objectives. Exotic forests will become increasingly exposed to risk, from pests, disease, and extreme weather amongst other threats. This risks carbon stored being released. Extensive afforestation also has sector implications for other land-uses.
- The role of native versus exotic forests in meeting the carbon dioxide removals objective. SBC/CLC are supportive of favouring native forests as a removal option, recognising the cobenefits associated with its sequestration potential around adaptation, resilience of carbon storage, and biodiversity.
- Regarding the potential for sequestration options beyond forests SBC/CLC note that there are
 emerging options for sequestration outside of forests. Careful consideration needs to be given
 sufficiently in advance to the role these could play in meeting our targets, domestic and
 international. Considerations could include scientific basis, permanence, risk, and cost amongst
 several other factors.
- Ongoing need for forests and sequestration to meet domestic net targets and international commitments.

Agreement across government about the direction of travel and the relative emphasis on gross as opposed to net emissions would be helpful. It provides certainty about the changes needed to meet these objectives and the policy settings likely to be in place that influence the activities of business.

However, a target alone will not achieve gross emissions reductions. This will be made real by the actions of business, communities and government. We therefore are keen to understand how the target would be translated into policy settings, through pricing and other policy mechanisms. We recommend the Commission and government be clear about the implication of targets for policy settings.

We also recommend the Commission recognise further the role and contribution of the private sector in delivering the transition². Businesses demonstrate a leadership position through mechanisms like the SBC Members Commitments and CLC Statement of Ambition, committing to action.

¹ We note the Commission's advice that "the ETS currently treats gross emissions reductions and carbon dioxide removals by forests as fully equivalent. Every New Zealand Unit (NZU) generated from a forest and sold into the NZ ETS allows a further tonne of emissions. Establishing and growing a pinus radiata forest delivers removals at relatively low cost (\$25-\$50 per tonne of CO2e), while many opportunities to reduce gross long-lived gas emissions cost upwards of \$100 per tonne of CO2e. The structure of the NZ ETS, combined with these economics, will likely result in extensive afforestation, allowing gross emissions to continue largely unabated." We further note the medium-term risk: that the "NZ ETS by the mid-2030s will lose the ability to incentivise carbon dioxide removals. There will not be enough demand from covered sectors to drive the further afforestation needed to reach net zero long-lived gas emissions across the economy by 2050."

² For example, The-role-of-business-in-delivering-the-UKs-Net-Zero-ambition.pdf (theccc.org.uk)

Emissions Pricing

We note the Commission's advice that the New Zealand Emissions Trading Scheme (NZ ETS) is not currently structured to drive gross emissions reductions. Without reform it will continue to drive afforestation rather than gross emissions abatement.

The Commission has suggested that the ETS be reformed to decouple incentives for gross emissions reductions and afforestation. SBC/CLC are concerned by the Commission's statement that the current settings risk a 'boom-and-bust' cycle for forestry, given the implications for climate policy and action over the next 10 years.

We are aware of the ongoing ETS work led by the government and are interested to see what conclusions or changes come about as a result of these, prior to commenting in detail on the Commission's draft conclusions and recommendations.

We support the recommendation that durable incentives be provided around removals from forests – this will be important to Aotearoa New Zealand meeting its long-term commitments, both domestic and international.

We note the estimates from the New Zealand <u>Treasury</u> around the potential costs of offshore mitigation. The availability and cost of the offshore mitigation required to meet our international commitments is unknown, but Treasury estimates range from \$4.2bn to \$23.7bn for meeting the Paris target, based on current policy action. This could be reduced to \$3.3bn to \$18.3bn if budgets are over-achieved. Forests, alongside gross emissions reductions, will continue to play an important role as New Zealand makes commitments beyond 2030 through the UN process.

The role of forests should also be balanced against the need to value and protect nature. We note the increasing momentum and expectations related to the Task Force for Nature Related Disclosures (TNFD) and the inextricable links to climate. Any new strategy should ensure the necessary alignment, assistance, and prioritisation is in place to facilitate effective management of natural capital alongside climate priorities.

We also note the distinction between forestry and forests. Native biodiversity provides benefits beyond carbon sequestration. We support the pursuit of mitigation policies that align with and support the delivery of the New Zealand Biodiversity Strategy and the National Policy Statement (NPS) on Biodiversity. A National Sequestration Strategy should consider these wider natural ecosystem benefits.

We are concerned about the amount of exotic afforestation taking place and the rapid and unplanned land-use change. SBC/CLC supports an ETS that delivers fair and equitable outcomes that support a just transition.

Further, SBC/CLC support a functioning ETS aligned to the outcomes Aotearoa New Zealand has set. Settings should include ambition for gross emissions reductions, and the ETS should reflect that. We support an ETS that provides certainty to participants, and is aligned to the strategic objectives, which should be clearly set and made explicit.

Hard to abate sectors and the NZ ETS

Several sectors, whose emissions are priced by the NZ ETS, do not currently have alternative technology options available to them to decarbonise. Options may be technically available globally (particularly where supported by government incentives) but the future pathway in Aotearoa may be decades away, and insufficiently incentivised by the NZ ETS due to non-pricing barriers. For example, international and domestic supply chain logistics challenges, coordination failures, policy uncertainty and/or split incentive issues to name a few.

The NZ ETS must be complemented by other mechanisms that allow or incentivise investment and choices, such as taxation, grants and subsidies. For example, as a hard to abate sector, aviation decarbonisation will not be incentivised through the NZ ETS alone. Aviation is a clear example of where complementary policies alongside the NZ ETS must be implemented.

We acknowledge that the Climate Emergency Response Fund (CERF), and other funding streams, contain ring-fenced funding to support the enduring nature of many of the challenges presented by climate change. It is important that the funding available is well-signalled, directed at the most cost-effective emissions reductions opportunities, and capitalises on the specific opportunities and challenges facing Aotearoa New Zealand.

Neither business nor Government can deliver this transition alone. It is only by working together through genuine public-private partnerships such as these that we will be able to bend the emissions curve and deliver on our net-zero commitments by 2050.

IV. Gaps in the Commission's advice

Enabling system transformation

SBC/CLC note that there are no recommendations made under the section of the advice 'Enabling system transformation'. We are aware the Commission considers the whole of its advice to be put forward to Government for consideration, not just the recommendations. There are several topics not elevated to recommendation status which SBC/CLC believe to be critical to achieving emissions reductions.

Progress across the government's commitments in emissions in the Emissions Budget 1 period for delivery in Emissions Budget 2 could be elevated. For example, the Commission has noted the importance of openly available, accessible, climate change data, and the potential of the digital economy to enable emissions reductions. Where these issues do not have a recommendation because of ongoing government work, we suggest the Commission reinforce the need to deliver in the first budget period. This is an area were many of SBC members and CLC signatories could contribute to the acceleration of emissions reduction through the use of technology and data.

We support the Commission's advice in Chapter 13 regarding enabling innovation and systems transformation. Specifically, the importance of:

- Targeted investment in climate change within the research, science, innovation, and technology system.
- Continuity of people, infrastructure, technology, and information to ensure we have the right resources at the right time.
- A regulatory environment that enables and incentivises early adoption to drive innovation.
- A strong digital economy to support digitalisation across sectors and improve resiliency across the economy by supporting innovation.

To accelerate system transformation, we believe it is important to coordinate the interconnected actions required across the research, science, innovation and technology sectors. Government should invest in helping connect a fragmented and growing climate change technology ecosystem. This will help contributing sectors and organisations understand their role in supporting transformation and highlight opportunities to coordinate action to remove barriers and accelerate adoption on new technologies.

International evidence demonstrates that Technology Roadmaps are an important tool to reduce emissions. Several comparable countries to New Zealand have reduced their carbon emissions while also growing their economies, with technology roadmaps or equivalents leading contributors. Examples include Denmark, Finland, Ireland and Switzerland.

We note that work is underway, coordinated by NZTech and its members, to scope a Technology Roadmap. This initial work is to connect and establish a foundation for industry collaboration, including focus areas and specific actions for industry and Government. This work is intended to establish the foundations for a full Technology Roadmap. We encourage the Commission to include support of a Technology Roadmap in its advice to Government.

Nature

The Commission did not include explicit reference to the role nature can play in realising a triple dividend of sequestration, climate adaptation, and biodiversity gains. Nature provides critical solutions for both mitigation and adaptation, and it must be protected or enhanced through our climate action.

Nature-based solutions – large-scale coastal and freshwater wetland restoration, riparian planting, the rewetting of peatlands, and the establishment of permanent indigenous forests in erosion-prone areas –

are often cheaper and more effective over the long-term than hard infrastructure, like seawalls. They also deliver significant co-benefits by removing more carbon from the atmosphere, providing habitat for native species, improving water quality, and creating employment and recreational opportunities.

Sequestration activities and policies related to sequestration ultimately reflect the trade-off made within an economy between carbon offsetting and direct emissions reductions. An optimal trade-off requires a thorough consideration of the wider impacts linked to the use of resources that enable sequestration, both in monetary terms (e.g. land used for agricultural production) and non-monetary terms (e.g. social and biodiversity impacts). These considerations point to the urgent need to develop a national sequestration strategy that identifies opportunities for nature-based sequestration, assesses alternative uses of resources, and balances choices against the need to value and protect our natural capital.

V. Creating low emissions options

As stated previously, the SBC/CLC response around the role of sectors in the transition to a low emissions economy can be found in the <u>Pre-election briefing paper: Policy priorities for accelerating climate action and building a resilient Aotearoa.</u> It has been restated in brief on pages 2 and 3 of this document.

Waste

SBC/CLC note and support the recommendations made around waste in their draft advice.

New waste management legislation proposed to reform the Waste Minimisation Act (2008) and the Litter Act (1979) should reset:

- 1. The purpose to minimising waste generation (aligned to the waste strategy).
- 2. The current levy. As it currently stands it imposes a differential levy amount on different classes of landfill. We propose the reform remove the differential levy per class of disposal facility and apply the levy to waste type. We find it inconsistent that 1 tonne of concrete can attract charges of between \$50.00/t and \$10.00/t in levy depending on which class of landfill it goes to, despite being the same category of waste. Applying a levy to the disposal of the waste type rather than the disposal facility would seem more effective. This will prevent waste resources being disposed to the lowest cost facility, protect the environment and enhance resource recovery.
- 3. How the ETS is applied to different classes of landfills. Class 1 landfills are exposed to the ETS, but Class 2 landfills are not included. Class 2 landfills still dispose of organic material such as timber and paper. The perverse outcome of this is a strong commercial incentive to own and operate a Class 2 landfill under the current legislation, with a lower levy and currently no ETS obligations.
- 4. Governance requirements to include industry representation. The waste industry collects and pays a very large percentage of the levy, yet only 50% (less administration costs) is available to fund industry led projects.

We agree that the Government should review and apply regulatory and policy settings and instruments to achieve the optimal use and efficiency of landfill gas capture systems and technologies. The Climate Change Act Unique Emissions Factors Regulations currently limits the maximum collection and destruction efficiency to 90%. This does not incentivise Class 1 landfills to invest to go beyond this.

We agree that a long-term waste infrastructure plan is urgently required, and that industry should be a key stakeholder in the plan's development.

If there is to be a landfill ban on organics then the door needs to be open to allow continued disposal to those Class 1 landfills with comprehensive landfill gas collection and destruction systems, while alternative national resource recovery infrastructure is established.

About SBC and CLC

Sustainable Business Council

The Sustainable Business Council (SBC) is a CEO-led membership organisation with over 130 businesses from all sectors, ambitious for a sustainable Aotearoa. Members represent more than \$118 billion of collective turnover, 33 per cent of GDP, and nearly 190,000 full-time jobs. Our network gives members the ability to take large-scale collective action. SBC is part of the BusinessNZ network and is the New Zealand Global Network partner to the World Business Council for Sustainable Development. www.sbc.org.nz/about/our-members/sbc-members

Climate Leaders Coalition

The Climate Leaders Coalition (CLC) was launched in July 2018 with 60 original signatories to promote business leadership and collective action on climate change. With nearly 100 signatories, they account for around \$126 billion of collective turnover, and employ more than 210,000 people. Signatory commitments include measuring and publicly reporting their greenhouse gas emissions, setting a public emissions reduction target, and working with suppliers to reduce their emissions. https://climateleaderscoalition.org.nz/





















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