
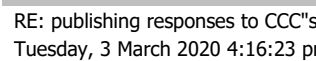


**From:** s 9(2)(a)  
**To:**   
**Cc:**   
**Subject:** RE: publishing responses to CCC's call for evidence  
**Date:** Tuesday, 3 March 2020 4:16:23 pm  
**Attachments:** [image001.png](#)  
[image002.jpg](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

Hi s 9(2)(a)

Thanks for your inquiry, apologies for the delay in replying.

In the first instance I'd recommend the proactive release guidance available on the State Services website, if you have not seen it yet. Although it focuses mainly on the release of Cabinet papers and OIA responses, the general principles and assessment requirements are fairly generic:

- <https://ssc.govt.nz/resources/official-information-proactive-release/>
- <https://ssc.govt.nz/assets/Legacy/resources/oia-proactive-release-dec2017.pdf>

From SSC website there is also reference and link to a copy of the Cabinet Office Circular CO (18)4, which is an example of a coversheet that is used to provide an explanation of material redacted etc when Cabinet papers are proactively released, which you may want to consider:

- <https://dpmc.govt.nz/publications/co-18-4-proactive-release-cabinet-material-updated-requirements>

We also ensure that if for instance a document is not published in full, that any information redacted, is removed in line with the Official Information Act, although we are not required to cite the section of the Act that applies when it is published. If there was then an OIA request for the document in full, we would then reconsider if the redaction was still applicable.

Ombudsman's guidance on proactive release is more limited, but the guidance notes (link below, see pages 35 and 36) is also worth noting:

- <https://www.ombudsman.parliament.nz/resources/oia-ministers-and-agencies-guide-processing-official-information-requests>

And, FYI on our website you can see examples of our proactive release of our Ministers' Weekly Updates, briefing notes etc:

- <https://www.mfe.govt.nz/briefings-search>

As s 9(2)(a) notes below, ensuring that all the risks have been considered and the appropriate appeals sought is key, as is developing a consistent process for staff to follow.

I hope this helps you.

Kind regards

s 9(2)(a)

**Executive Relations Team**

Ministry for the Environment – Manatū Mō Te Taiao

Mobile: s 9(2)(a) [@mfe.govt.nz](mailto:s 9(2)(a)@mfe.govt.nz) Website: [www.mfe.govt.nz](http://www.mfe.govt.nz)

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cid:image003.jpg@01D26A65.99010DF0





**From:** s 9(2)(a) @mfe.govt.nz>  
**Sent:** Friday, 28 February 2020 9:49 AM  
**To:** s 9(2)(a) @climatecommission.govt.nz>; s 9(2)(a) @mfe.govt.nz>  
<https://ssc.govt.nz/resources/official-information-proactive-release/>  
**Cc:** s 9(2)(a) @climatecommission.govt.nz>; s 9(2)(a) @mfe.govt.nz>

**Subject:** RE: publishing responses to CCC's call for evidence  
 Hi s 9(2)(a)

The best person at MfE to talk to is probably s 9(2)(a) - she knows everything there is to know about MfE's processes around releasing official information. She'll be able to advise on how the specified proactive releases (like Cab papers and briefings) are done or put you on to the right person who can.

My understanding though is that more general proactive releases are considered in a more ad hoc way though s 9(2)(a) if I'm wrong, do correct me). That it's up to managers to be happy that the right risks have been considered and accounted for in authorising proactive release. For the MACCs report for example, it was just me talking with s 9(2)(a) original authors about whether there were commercial-in-confidence issues, and testing that further with EECA.

Cheers

s 9(2)(a)

Ministry for the Environment – Manatū Mō Te Taiao  
 Phone: s 9(2)(a) @mfe.govt.nz | Website: [www.mfe.govt.nz](http://www.mfe.govt.nz)

**From:** s 9(2)(a) @climatecommission.govt.nz>  
**Sent:** Wednesday, 26 February 2020 6:07 PM  
**To:** s 9(2)(a) @mfe.govt.nz>; s 9(2)(a) @mfe.govt.nz>  
**Cc:** s 9(2)(a) @climatecommission.govt.nz>  
**Subject:** publishing responses to CCC's call for evidence

### MFE CYBER SECURITY WARNING

This email originated from outside our organisation. Please take extra care when clicking on any links or opening any attachments.

Hi s 9(2)(a)

I'm getting in touch because we're hoping to publish the responses we received to our Call for Evidence on our website shortly (which hopefully is good news from the transition team's perspective as it will mean that this material will become available to MfE).

We've realised, however, that there's probably some risk management thinking & process that we need to put around the pro-active release of this sort of information, but we don't have any procedures in place at the moment since we haven't had time to establish much in the way of organisational policies. So we're keen to find out about how MfE approaches proactive information releases (with the idea being that if we can borrow from MfE's approach we can't go too wrong) – but I'm not sure who would be the right person or

team at MfE these days to ask about this (Executive Relations? Comms & engagement?). So this might be a bit random but I was wondering if you or s 9(2)(a) could perhaps suggest who to talk to over there about this sort of thing or even put us in touch with someone relevant?

NB: I've copied in s 9(2)(a) because he is the one actually leading on the call for evidence release stuff.

Thanks in advance for any tips you can offer!

s 9(2)(a)



s 9(2)(a)

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**From:** s 9(2)(a)  
**To:**  
**Subject:** RE: [UNCLASSIFIED] NDC work  
**Date:** Tuesday, 9 June 2020 12:17:15 pm  
**Attachments:** [image001.png](#)  
[ConsistencyWithScenarios.docx](#)  
[05-2020-B-06407 Scientific analysis of compatibility of the NDC with 1.5 degrees.pdf](#)

Hi s 9(2)(a)

Thanks for the chat.

I've attached the briefing we wrote earlier this year and some notes I made on the side. Let me know if they need any more explanation.

Let's keep in touch about this work.

Cheers,

s 9(2)(a)

**From:** s 9(2)(a) @climatecommission.govt.nz>

**Sent:** Monday, 8 June 2020 3:34 PM

**To:** s 9(2)(a) @mfe.govt.nz>

**Subject:** RE: [UNCLASSIFIED] NDC work

[UNCLASSIFIED]

I'm free at 10:30 and then free all morning. How about I book in 10:30-11 and we can run longer if we need to?

[UNCLASSIFIED]

**From:** s 9(2)(a) @mfe.govt.nz>

**Sent:** Monday, 8 June 2020 3:12 pm

**To:** s 9(2)(a) @climatecommission.govt.nz>

**Subject:** RE: [UNCLASSIFIED] NDC work

Yep, I'm pretty free tomorrow.

Does 10-11 work? Can be shorter or longer depending on what you have in mind.

**From:** s 9(2)(a) @climatecommission.govt.nz>

**Sent:** Monday, 8 June 2020 2:44 PM

**To:** s 9(2)(a) @mfe.govt.nz>

**Subject:** RE: [UNCLASSIFIED] NDC work

[UNCLASSIFIED]

Hi s 9(2)(a)

Great. What's your diary like for tomorrow or Wednesday? Are you free in the morning tomorrow?

s 9(2)(a). While we're still recruiting our tier 2/dep sec equivalents he's our main lead on the policy and budget work.

Cheers

s 9(2)(a)

[UNCLASSIFIED]

**From:** s 9(2)(a) @mfe.govt.nz>

**Sent:** Monday, 8 June 2020 11:45 am

**To:** s 9(2)(a) @climatecommission.govt.nz>

**Subject:** RE: [UNCLASSIFIED] NDC work

Hi s 9(2)(a)

Good to hear from you.

Yep I have done a bit of work looking at the NDC and 1.5 degrees. I'm happy to chat about it – it's a very interesting topic.



I've also been thinking about furthering the work a bit, so it would be good to discuss.

Cheers,

s 9(2)(a)

PS. Who is s 9(2)(a) I don't think I've heard that name before

**From:** s 9(2)(a) <[s9\(2\)\(a\)@climatecommission.govt.nz](mailto:s9(2)(a)@climatecommission.govt.nz)>

**Sent:** Monday, 8 June 2020 10:33 AM

**To:** s 9(2)(a) <[s9\(2\)\(a\)@mfe.govt.nz](mailto:s9(2)(a)@mfe.govt.nz)>

**Subject:** [UNCLASSIFIED] NDC work

[UNCLASSIFIED]

Hi s 9(2)(a)

Hope all's well with you and you're enjoying Queenstown life.

I am working on the two requests Minister Shaw made of the Commission under s5k of the CCRA – to examine the consistency of the NDC with keeping warming to 1.5 degrees, and the long-term cuts to methane likely to be required of NZ to keep warming to 1.5 degrees.

s 9(2)(a) mentioned that you're doing a bit of work looking at the consistency of the NDC with keeping warming to 1.5 degrees – is that right? Can we catch up and compare notes?

Cheers

s 9(2)(a)

EDDA4B20



s 9(2)(a)

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[UNCLASSIFIED]

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### Consistency with 1.5°C

I looked at Kyoto gases in scenarios that limit warming to 1.5°C above preindustrial levels with no or limited overshoot in the IPCC SR15. There are 36 scenarios that report net emissions of Kyoto gases. Since the scenarios only report emissions at five or 10 year intervals, I infilled missing years by assigning each missing value the mean of the two adjacent entries. For example, to get emissions in each year between 2021 and 2024 ( $E_{2021}$  and  $E_{2024}$ ), I took

$$E_{2021} = E_{2022} = E_{2023} = E_{2024} = \frac{E_{2020} + E_{2025}}{2}$$

For the purposes of calculating a budget, this is equivalent to a linear interpolation. I scaled emissions in the scenarios to make them comparable to New Zealand's contribution to global emissions by multiplying every entry by  $\frac{Emissions_{2015}(NZ)}{Emissions_{2015}(global)}$ . I summed the annual emissions for every year from 2021 to 2030 to get a 'budget' for the first Paris commitment period in each scenario. Budgets from each scenario are plotted below compared to the budget for New Zealand's current NDC of 601 Mt CO<sub>2</sub>e in red.



Figure 1. Total net emissions for the 2021 to 2030 period in scenarios limiting warming to 1.5°C above preindustrial levels with no or limited overshoot (blue) compared to the 2021-2030 budget for New Zealand's current NDC (red).

1. To determine if our current NDC is consistent with the temperature goals in the Paris Agreement, we looked at scenarios in the IPCC's Special Report on 1.5°C. In particular, we

looked at scenarios limiting warming to 1.5°C with no or limited overshoot, and at scenarios limiting warming to 2°C.

2. We performed calculations enabling us to compare our NDC with scenarios that meet the temperature goals in the PA. We have provided a run-through of the methodology for this below.
3. Scenarios in the SR15 only report global emissions every five or 10 years. The first step was therefore infilling missing data using linear interpolation. We then scaled global emissions values for each year according to New Zealand's proportion of global emissions in 2010. Since NZ is about 0.12% of net global emissions, this is essentially equivalent to multiplying global emissions by 0.0012.
4. Using the scaled values, we then computed a 'budget' for the 2021-2030 period for each scenario that meets the 1.5°C goal. This provides a representation of New Zealand-specific budgets over the 2021-2030 period in each scenario.
5. A comparison of these budgets with our actual NDC budget is in Figure 1. Each blue bar shows a possible 2021-2030 emissions budget for New Zealand that would be consistent with limiting warming to 1.5°C. The red bar, our current NDC, is well outside the range of budgets in the scenarios, suggesting that our NDC is not consistent with 1.5°C.



Figure 2. Same as Figure 1 but for scenarios meeting the 1.5°C target with high overshoot or meeting the 2°C target. There are significantly more scenarios in this subset.

6. Figure 2 shows a similar analysis for scenarios that meet the 2°C target or meet 1.5°C with a high overshoot.
7. New Zealand's NDC falls at the upper end of the range (145<sup>th</sup> highest out of 170, making it roughly in the 85<sup>th</sup> percentile).
8. This means that it does not fall within the interquartile range, keeping in mind that this includes scenarios meeting 1.5°C with high overshoots. If we remove those scenarios and look only at those limiting warming to 2°C, our NDC is 83<sup>rd</sup> highest out of 101, still above the interquartile range (not shown).

9. None of this accounts for the use of international units to meet our target. These analyses are based on the assumption that every country reduces their emissions by the same fraction on average. Our use of international units means that our actual domestic emissions will be greater than the target amount, even if we meet the target. This suggests that other countries will have to make deeper cuts to ensure the global average is consistent with these scenarios and is likely to impact on our consistency.

Assuming a linear decline in biogenic CH<sub>4</sub> beginning in 2020 and reaching 10% below 2017 levels in 2030, we can compute a CH<sub>4</sub> budget that meets the 2030 requirements of the Zero Carbon Act. Subtracting this budget from the total NDC budget gives an effective budget for long-lived gases. We can then compare each of these budgets with their counterparts in the IPCC SR15. A difficulty arises, however, in the fact that forestry removals have made net long-lived gases quite variable. 2010 was a particularly low year, so the scaling factor is unreliable. One option to circumvent this would be to use the mean of the adjacent five years (or similar) but this may introduce consistency issues with the other analyses.

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Refused under s 18(d), as it is publicly available at: <https://environment.govt.nz/assets/Publications/scientific-analysis-of-compatibility-of-ndc-with-1.5-degrees.pdf>

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**From:** s 9(2)(a)  
**To:**  
**Subject:** RE: [UNCLASSIFIED] NDC accounting  
**Date:** Tuesday, 23 June 2020 12:14:44 pm  
**Attachments:** [image001.png](#)  
[Reporting accounting document 13 05 2020.docx](#)

Hi s 9(2)(a)

Nice to hear from you.

The first "communication" under the Paris Agreement will be the first biennial transparency report (BTR). Given that ratification and NDC was submission occurred in advance of agreeing the rules, we didn't know what "communications" under the Paris Agreement would be called. Under the UNFCCC these are called national communications, hence the use of the term "communication".

So to cut a long story short, this first communication (BTR) hasn't happened yet (we continue to provide reports under the UNFCCC in the interim) and it is not due until December 2024. In the meantime we need to make quite a number of domestic decisions about our Paris Agreement accounting.

Attached is a document I put together to assist with MfE's "preparation for Paris". This document has no official status; it is my attempt to bring material from CMA decisions, NZ's NDC, and where relevant, NZ's current reporting/accounting, into one place in order to provide an overview of what has been decided, and what still needs to be decided. Given your question, you might also find it useful. Very happy to discuss.

Regards

s 9(2)(a)

**From:** s 9(2)(a) <[REDACTED]@climatecommission.govt.nz>  
**Sent:** Tuesday, 23 June 2020 10:49 AM  
**To:** s 9(2)(a) <[REDACTED]@mfe.govt.nz>  
**Subject:** [UNCLASSIFIED] NDC accounting  
 [UNCLASSIFIED]

Hi s 9(2)(a)

I hope you're doing well, and MfE is not too uncertain right now.

A question about our NDC accounting approach: Has New Zealand communicated the full set of accounting rules we will use for our NDC? The first NDC laid out several important accounting approaches (averaging, reference level approach, HWP and others) but also said: "New Zealand's approach to forestry and other land use accounting will be fully described in its first communication under the Paris Agreement." I didn't see it in our communication this year but

s 9(2)(a) suggested that it had happened a year or two ago.

Has that communication happened? Where can I find it?

Cheers

s 9(2)(a)

EDDA4B20



s 9(2)(a)

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[UNCLASSIFIED]

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## Inventory Reporting and NDC Accounting 2021-2030

This document attempts to summarise inventory reporting and NDC accounting that applies to New Zealand's first NDC, covering the period 2021-2030. The table is organised as follows:

- Inventory information
- Information for accounting
- GWP
  - Reporting
  - accounting
- LULUCF coverage
  - Reporting
  - Accounting
- Article 6 and ITMOs

Links to the two most relevant CMA<sup>1</sup> decisions are provided below. The transparency framework decision (18/CMA.1) contains the inventory reporting requirements together with information requirements for accounting (Information necessary to track progress made in implementing and achieving NDCs under Article 4 of the Paris Agreement). The accounting decision (4/CMA.1) is quite high level and addresses striving to avoid overestimating or underestimating projected emissions and removals used for accounting, being transparent and maintaining methodological consistency, rather than providing the level of detail found in decision 18/CMA.1.

### Reference decisions

Decision 18/CMA.1 and its annex (MPGs<sup>2</sup> for the transparency framework)

[https://unfccc.int/sites/default/files/resource/CMA2018\\_03a02E.pdf](https://unfccc.int/sites/default/files/resource/CMA2018_03a02E.pdf)

Decision 4/CMA.1 and its annex II (accounting)

[https://unfccc.int/sites/default/files/resource/cma2018\\_03a01E.pdf](https://unfccc.int/sites/default/files/resource/cma2018_03a01E.pdf)

The table below sets out the requirements for inventory reporting and for accounting, and where relevant refers to New Zealand's first NDC (quotes from the NDC are in *italics* in the table).

The table also identifies where decisions are still outstanding, and these are highlighted:

- International process leading to CMA decision
- Domestic decision needed

<sup>1</sup> CMA: Conference of the Parties serving as the meeting of the Parties to the Paris Agreement.

<sup>2</sup> MPGs: Modalities, procedures and guidelines

	Paris Agreement plus decisions 18/CMA.1 and 4/CMA.1	notes
<b>Inventory information</b>	<p>Reporting <u>Methodologies</u>: IPCC 2006 guidelines; encouraged to use IPCC Wetlands Supplement</p> <p><u>GWP</u>: IPCC AR5 100-year GWPs (see separate section below)</p> <p><u>How and what to report</u>: MPGs in the Annex to 18/CMA.1</p>	<ul style="list-style-type: none"> <li>NZ already using 2006 guidelines (since 2015)</li> <li>Decision required on whether (or when) to use the IPCC Wetlands Supplement</li> <li>The MPGs, including that IPCC AR5 100-year GWPs are to be used, apply to the first annual inventory report submitted under the Paris Agreement (April 2023) and all subsequent reports (biennial transparency reports and annual inventories)</li> <li>The national inventory report section of the annex to 18/CMA.1 (Section II) asks for the same information as the current UNFCCC guidelines for Annex I Party inventories. The ordering is different, but content more-or-less the same.</li> <li>Still being negotiated under SBSTA are the inventory reporting tables (CRF tables) and the outlines for the national inventory document (NID) and the biennial transparency report (BTR)</li> <li>SBSTA is yet to discuss application of the IPCC 2019 Refinement. Status in relation to inventories reported under the Paris Agreement (or the UNFCCC) is unclear.</li> </ul>
<b>Information for accounting</b>	<p><u>Inventory information</u>: prepared as above; LULUCF subset (see below)</p> <p><u>Other information to be reported</u>: MPGs in the Annex to 18/CMA.1, section III (Information necessary to track progress made in implementing and achieving NDCs under Art 4 of the Paris Agreement)</p> <p>Annex II of 4/CMA.1</p>	<ul style="list-style-type: none"> <li>The MPGs in section III of the Annex to 18/CMA.1 apply to NDC1 and to subsequent NDCs.</li> <li>Accounting guidance under the Paris Agreement (Annex II of 4/CMA.1) is mandatory for NDC2 onwards.</li> <li>Parties may elect to apply such guidance to their first nationally determined contribution</li> <li>Decision required on NZ's application of the accounting guidance to NDC1 (including GWP issue - see below)</li> <li>In addition to the GWP question, need to explore whether NZ should apply the accounting guidance in decision 4/CMA.1 to NDC1 – are there any impediments to doing this?</li> </ul>



		<p>If so could they be addressed prior to submitting the first biennial transparency report (BTR) under the Paris Agreement? The first BTR (due by Dec 2024) will include information on our accounting intentions.</p> <ul style="list-style-type: none"> <li>• Still being negotiated under SBSTA is the common tabular format for providing NDC accounting information in a structured summary</li> </ul>
GWP	Reporting: IPCC AR5 100-year GWPs	<ul style="list-style-type: none"> <li>• This is a change – time series will need to be recalculated</li> <li>• In addition, Parties may also use other metrics to report supplemental information on aggregate emissions and removals, expressed in CO<sub>2</sub> eq; and provide values used and the IPCC assessment report they were sourced from.</li> <li>• If NZ decides not to use AR5 GWPs for accounting for NDC1 (see next cell below) it could instead elect to report aggregate emissions and removals in the inventory using AR4 GWPs which would feed through into the NDC accounting. Decision required – included below.</li> <li>• Irrespective of this accounting issue, NZ could still elect to report supplemental information on aggregate emissions and removals in CO<sub>2</sub> eq using another metric. Decision required.</li> </ul>
	Accounting: As per Annex II of 4/CMA.1: IPCC AR5 100-year GWPs for NDC2 onwards	<ul style="list-style-type: none"> <li>• Accounting guidance under the Paris Agreement is mandatory for NDC2 onwards (but can opt to apply it to NDC1).</li> <li>• NZ's first NDC states IPCC AR4 100-year GWPs.</li> <li>• Decision needed on whether NDC1 accounting will use AR4 or AR5 GWPs and if not, whether, in addition to the mandatory reporting of GHG inventory information using AR5 GWPs, NZ will elect to report aggregate emissions and removals in the inventory using AR4 GWPs which would feed through into the NDC accounting.</li> </ul>

LULUCF coverage	<p><b>Reporting:</b>          IPCC 2006 guidelines          See above re the IPCC Wetlands Supplement</p> <ul style="list-style-type: none"> <li>If emissions and removals from natural disturbances on managed lands is addressed in the inventory, report on approach taken, how it is consistent with IPCC guidance; if estimates are indicated in national totals (MPGs, para 55)</li> <li>If including emissions and removals from harvested wood products and not using the production approach, provide supplementary information on emissions and removals using the production approach (MPGs, para 56)</li> </ul> <p><b>Accounting:</b></p> <ul style="list-style-type: none"> <li>Parties that draw on existing methods and guidance established under the Convention and its related legal instruments, as appropriate, provide information on how they have done so (Annex II, para 1(c))</li> <li>Parties strive to include all categories of anthropogenic emissions or removals in their nationally determined contributions and, once a source, sink or activity is included, continue to include it (Annex II, para 3(b))</li> <li>Parties shall provide an explanation of why any categories of anthropogenic emissions or removals are excluded (Annex II, para 4)</li> </ul>
	<p>Current reporting already addresses emissions and removals from natural disturbance. Refer to NIR 2020, section 11.1.3, Election of the Natural disturbance provision.</p> <p>NZ uses the production approach for emissions and removals from harvested wood products</p>
	<p>Applies to all sectors but is particularly pertinent to LULUCF, and NZ's NDC: <i>New Zealand's assumed accounting for the forestry and other land use sector will be based on a combination of the 2006 IPCC Guidance and the 2013 IPCC Kyoto Protocol Supplement, providing for Kyoto Protocol accounting approaches to be applied to the greenhouse gas inventory land-based categories</i></p>
	<p>Applies to all sectors but is particularly pertinent to LULUCF. LULUCF accounting as described in NZ's NDC is a continuation of a Kyoto Protocol styled approach where accounted emissions/removals are from a subset of categories or activities.</p>
	<p>A subset approach to accounting is OK. Will need to be explained/justified.          Decision required on whether NZ will expand its accounting base for LULUCF or stick with what is in the NDC, with the potential to expand the coverage for NDC2 (due for submission in 2025).</p>

	<ul style="list-style-type: none"> <li>The approach used to address emissions and subsequent removals from natural disturbances on managed lands (MPGs para 75(d)(i))</li> </ul> <p>And in a more detailed form in the accounting guidance:</p> <ul style="list-style-type: none"> <li>Parties that decide to address emissions and subsequent removals from natural disturbances on managed lands provide detailed information on the approach used and how it is consistent with relevant IPCC guidance, as appropriate, or indicate the relevant section of the national greenhouse gas inventory report containing that information (Annex II, para 1(e))</li> </ul>	<p>NDC:</p> <p><i>Accounting provisions to address <b>natural disturbance</b>, land-use flexibility, legacy effects, non-anthropogenic effects and additionality since the activity start year will also continue to apply, building on existing guidance.</i></p> <p>Current reporting already addresses emissions and removals from <b>natural disturbance</b>. Refer to NIR 2020, section 11.1.3, Election of the Natural disturbance provision. However it appears that <b>whether this will flow through into accounting is yet to be decided</b> as NIR 2020 states: “New Zealand may choose to apply the provision for the treatment of natural disturbance emissions to its afforestation and reforestation accounting”</p> <p><b>What about the other things on the list from the NDC?</b> i.e. <i>land-use flexibility, legacy effects, non-anthropogenic effects and additionality since the activity start year will also continue to apply, building on existing guidance.</i></p> <p>What is meant by “building on existing guidance” and what does it mean that accounting provisions for these things “will continue to apply”?</p> <p>“Legacy effects, non-anthropogenic effects, and additionality” terms are not used in NIR 2020. Given that these terms are used in the NDC, need to be sure NZ’s accounting addresses them.</p>
	<ul style="list-style-type: none"> <li>The approach used to account for emissions and removals from harvested wood products. (MPGs para 75(d)(ii))</li> </ul> <p>And in a more detailed form in the accounting guidance:</p> <ul style="list-style-type: none"> <li>Parties that account for emissions and removals from harvested wood products provide detailed information on which IPCC approach has been used</li> </ul>	<p>NDC:</p> <p><i>Harvested wood products accounting will be based on the production approach</i></p> <p>We already report on and account for changes to the harvested wood products pool (accounting applies from 2013 onwards).</p>

	<p>to estimate emissions and removals (Annex II, para 1 (f))</p> <ul style="list-style-type: none"> <li>The approach used to address the effects of age-class structure in forests. (MPGs, para 75(d)(iii))</li> </ul> <p>And in a more detailed form in the accounting guidance:</p> <ul style="list-style-type: none"> <li>Parties that address the effects of age-class structure in forests provide detailed information on the approach used and how this is consistent with relevant IPCC guidance, as appropriate (Annex II, para 1(g))</li> </ul>	<p>NDC: <i>Forests established before the activity start year will continue to be accounted for under a business-as-usual reference level, as per the Kyoto Protocol, to address the dynamic effects of age structure resulting from activities and practices before the reference year, and the ongoing cycles of forest harvest and regrowth that occur as part of normal, sustainable forest management.</i></p> <p>Section 11.6.2 of NIR 2020 addresses the dynamic effects of age structure</p> <p>NZ uses a subset of the LULUCF information reported in the inventory for LULUCF accounting in the period 2013-2020 (and did so for the previous period 2008-2012 under the Kyoto Protocol). The description of forestry accounting in the NDC indicates that this “subset approach” will continue to apply in the period 2021-2030. This is related to the question/decision above about whether we expand the accounting base for LULUCF or stick with what is in the NDC.</p>
<p>Article 6 and internationally transferred mitigation outcomes (ITMOs)</p>	<p>Decision 4/CMA.1 and its annex II do not explicitly refer to Article 6 of the Paris Agreement. The decision recalls Art 4.13 of the Paris Agreement: that Parties shall promote environmental integrity, transparency, accuracy, completeness, comparability and consistency, and ensure the avoidance of double counting, in accordance with guidance adopted by the CMA, and decides that, in accounting for anthropogenic emissions and removals corresponding to their nationally determined</p>	<p>[basically it has been decided twice that Parties shall ensure the avoidance of double counting – must be important]</p> <p>Negotiations on Article 6 of the Paris Agreement are ongoing and more guidance on ITMOs and accounting for ITMOs could be expected at the conclusion of these negotiations (scheduled for completion this year, but will be delayed because of COVID-19).</p> <p>Para 77(d)(iii) makes provision for further guidance to come from decisions adopted by the CMA on reporting under Article 6. In the meantime, and until the CMA takes any further decisions on Article 6, the guidance in Para 77(d) of the MPGs</p>

	<p>contributions, Parties shall ensure the avoidance of double counting.</p> <p>For Parties that are involved in using ITMOs, para 77(d) of the MPGs lists the information that is to be reported in the structured summary to track progress made in implementing and achieving the NDC.</p>	<p>stands. Unfortunately a few Parties disagree with the above which hinders discussion on the format of the structured summary table (the “accounting table”). As noted above the structured summary table is one of the tabular formats still being negotiated under SBSTA.</p>
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### Summary of things yet to be agreed in the international negotiation process

- Which AR5 100-year GWPs apply – with or without carbon cycle feedbacks?
- The format of the reporting tables, and when the tables will be completed [was supposed to be end of 2020 but work was already behind prior to COVID-19 disruption]
- How the IPCC 2019 Refinement will be treated. Might expect a decision or some guidance on this at the same time that the CMA takes a decision on the reporting tables
- Any additional information or accounting requirements for ITMOs [was supposed to be end of 2020 but COVID-19 disruption] which might have implications for the registry function.

### Summary of decisions needed domestically

- whether (or when) to use the IPCC Wetlands Supplement
- application of the accounting guidance in decision 4/CMA.1 to NDC1 in full/in part, or not at all
- nested within the above: whether NDC1 accounting will use AR4 or AR5 GWPs. If not, whether, in addition to reporting GHG inventory information using AR5 GWPs (which is mandatory), New Zealand will elect to report aggregate emissions and removals in the inventory using AR4 GWPs which would feed through into the NDC accounting given that the NDC is formulated on the basis of AR4 GWPs.
- if a decision is taken to use AR5 GWP-100 for accounting, whether in addition New Zealand should elect to report supplemental information on aggregate emissions and removals in CO<sub>2</sub> eq using another metric.
- whether New Zealand will expand the NDC1 accounting base for LULUCF or stick with what is in the NDC, with the potential to expand the coverage for NDC2 (due for submission in 2025)
- whether to apply the provision for the treatment of natural disturbance emissions to afforestation and reforestation accounting

### Other questions/issues raised above:

**What about the other things on the list from the NDC?** i.e. *land-use flexibility, legacy effects, non-anthropogenic effects and additionality since the activity start year will also continue to apply, building on existing guidance.*

- What is meant by “building on existing guidance” and what does it mean that accounting provisions for these things “will continue to apply”?
- NIR 2020 does not use the terms: “Legacy effects, non-anthropogenic effects, and additionality” Given that these terms are used in the NDC, need to be sure New Zealand’s accounting addresses them.



**From:** s 9(2)(a)  
**To:**  
**Subject:** RE: [UNCLASSIFIED] Potential work for NZ's Climate Change Commission  
**Date:** Wednesday, 15 July 2020 4:53:34 pm  
**Attachments:** [Outlook-EDDA4B20.png](#)

Thanks s 9(2)(a) In principle this can work, with two caveats:

One is that responding to review comments potentially entails a significant amount of work for the author team, and they need to budget this in.

The other and more substantive one is that your hope that “we can agree on the underlying science and the tradeoffs at play” is not entirely getting to the issue: I’m not aware of any scientific disagreement about the role of methane, so what are the questions you actually want the report to answer and that the authors are equipped to answer?

Scientists often are not even aware of where value judgements and choices already come in, and/or taking short-cuts through those. So the answer they give will be determined to a large extent by what they decide the relevant question is - which may or may not match what you need from your perspective. Jan, Piers and Richard will do their best to be science-based and neutral, but they are at risk of not being sufficiently clear about the policy implications of how certain scientific questions are framed that they might think are the natural and obvious questions.

An alternative approach could be that the CCC drafts what you think the scientific basis and open questions and points of disagreement are, and contract a good range of scientists to comment on this (repeatedly, with the goal for you to facilitate a near-consensus on what scientists can agree on, and sifting out what they don't - and do as many iterations as you need to get to the point of really nailing the disagreement). I think this would give you a greater control and flexibility to find out what the actual point of divergence is and the policy context/need, rather than leave it to the framing that the (natural science) authors might chose because they think this is the natural way to approach the question but they might not get the difference between a scientific and policy objective.

If you do go with an external team of (natural) scientists writing a report for you, I suggest you plan for a lot of on-going steering work to ensure the report remains open in its framing and what the authors think the motivating policy question is. And perhaps consider two rounds of peer review to enable the author team to actually change perspectives in response to a first round of review comments, rather than make this a one-shot interaction between authors and scientific reviewers. Also, consider getting the authors to respond, IPCC-style, to each comment, in addition to revising their draft, so you get to see the feedback they are getting and can steer them along the way regarding which points matter to you.

Sorry if I'm meddling in your work!! Just thinking aloud about what we've tried before and where we're at in this debate.

Cheers, s 9(2)(a)

**From:** s 9(2)(a) <@climatecommission.govt.nz>

**Sent:** Wednesday, 15 July 2020 2:00 pm

**To:** s 9(2)(a) <@mfe.govt.nz>

**Subject:** RE: [UNCLASSIFIED] Potential work for NZ's Climate Change Commission

[UNCLASSIFIED]

Thanks s 9(2)(a)

That's really helpful. That marries with what s 9(2)(a) said – that anyone who had sufficient expertise to be useful would have a stake in one camp or the other. I think that's going to be okay. We are being pretty clear that we want this piece to stick to the natural science

and illuminate where the policy and political choices are without commenting on what judgements we should make about those choices.

What we're hoping is that the various camps on methane basically agree on the underlying science and the tradeoffs at play, and mostly disagree on what choices we should make – not what the choices are to be made. Do you think that's a fair description? That would allow us to leave the recommendations for what balance to strike within those tradeoffs for our recommended budgets and advice – so hopefully the different camps can agree or disagree with our recommendations, but everyone can be transparent about why we disagree, rather than disagree about the science piece.

We're currently looking at getting Jan, and Piers and Richard Millar to do it together. I was thinking that some of the New Zealand specialists in the field – yourself, s 9(2)(a), perhaps a few others, could peer review it before it's finalised. Nothing finalised yet but that's where we're thinking. How does that suggestion sit with you?

Cheers

s 9(2)(a)

[UNCLASSIFIED]

**From:** s 9(2)(a)

[@mfe.govt.nz](mailto:@mfe.govt.nz)

**Sent:** Friday, 3 July 2020 10:32 am

**To:** s 9(2)(a)

[@climatecommission.govt.nz](mailto:@climatecommission.govt.nz)

**Cc:** [andy.reisinger@agresearch.co.nz](mailto:andy.reisinger@agresearch.co.nz)

**Subject:** Re: [UNCLASSIFIED] Potential work for NZ's Climate Change Commission

Hi s 9(2)(a)

Thanks for asking!

s 9(2)(g)(i)

One thing to add is that you'll need to be very clear whether the advice you're commissioning is purely a natural science advice, or is something to do with its implications and applications in policy. In my experience, none of the scientists who land on different conclusions with regard to NDC or CH4 targets disagree about the science - so is commissioning yet another natural scientist writing a climate science report going to resolve whatever open question you have?

With that in mind, If I may, I would suggest perhaps one other person, and that is s 9(2)(a) s 9(2)(a)

He hasn't published anything specifically on metrics, but certainly a lot on methane emissions and fully understands the science. As far as I know he is a trusted source of advice by the Australian livestock industry and has been talking to them about CH4/metrics recently (and certainly has his head around the relevant science), plus he has a deep understanding of livestock systems and emissions which may be relevant to your purpose.

The problem is that anybody who has thought through to the link of climate science with policy choices around NDC and CH4 targets may end up with a (hopefully, well reasoned and articulated) conclusion on those matters. But that conclusion by definition will not satisfy one or the other ends of the range of views on those matters that you will have heard.

So in a way you have the choice between EITHER somebody who is 'neutral' but almost by definition will not provide you with information that helps resolve the divergent views

the Commission has to deal with, OR somebody whose advice will be highly relevant to those issues but who will not be seen as 'neutral' by at least some people with a stake in this debate.

I hope this 'bob on both sides' response is helpful nonetheless...

Cheers, s 9(2)(a)

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**From:** s 9(2)(a) <[s 9\(2\)\(a\)@climatecommission.govt.nz](mailto:s 9(2)(a)@climatecommission.govt.nz)>

**Sent:** Thursday, July 2, 2020 2:08 PM

**To:** s 9(2)(a) <[s 9\(2\)\(a\)@mfe.govt.nz](mailto:s 9(2)(a)@mfe.govt.nz)>

**Cc:** s 9(2)(a) <[s 9\(2\)\(a\)@agresearch.co.nz](mailto:s 9(2)(a)@agresearch.co.nz)>

**Subject:** FW: [UNCLASSIFIED] Potential work for NZ's Climate Change Commission  
[UNCLASSIFIED]

Hi s 9(2)(a)

Just wondering if I could runs something by your real quick:

We were looking at contracting Piers Forster to do some work on the climate science side of the methane and NDC work, and he recommended Richard Millar and/or Jan Fuglesvedt to help or do it instead. Do you know anything about those two? Would they be reputable choices?

Cheers

s 9(2)(a)

[UNCLASSIFIED]

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**From:** Piers Forster s 9(2)(a)

**Sent:** Tuesday, 30 June 2020 2:12 am

**To:** s 9(2)(a) <[s 9\(2\)\(a\)@climatecommission.govt.nz](mailto:s 9(2)(a)@climatecommission.govt.nz)>

**Subject:** Re: [UNCLASSIFIED] Potential work for NZ's Climate Change Commission

Hi s 9(2)(a)

Thank you for the approach. I think there are lots of subjective views out there on the topic of methane and it is important you try and get a balanced objective views. I would like to try and help but it is hard for me realistically to carve out any time. Have you approached Jan Fuglesvedt at CICERO or Richard Millar who works with me at the UK CCC, both would do a good job. The three of us could maybe work together to reduce the workload on any one of us. ...

So please send more details, but I am afraid I can't promise to be able to help

Piers

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**From:** s 9(2)(a) <[s 9\(2\)\(a\)@climatecommission.govt.nz](mailto:s 9(2)(a)@climatecommission.govt.nz)>

**Sent:** 28 June 2020 23:38

**To:** Piers Forster s 9(2)(a)

**Subject:** [UNCLASSIFIED] Potential work for NZ's Climate Change Commission  
[UNCLASSIFIED]

Dear Professor Forster

I hope you are as well as is possible given the current global situation. My name is s 9(2)(a)

– I am working at New Zealand's Climate Change Commission. I wanted to sound you out about your availability and interest in a piece of work we'd like to commission to be done over the coming months on pathways and tradeoffs involved in the world keeping warming below 1.5 degrees.

New Zealand's Climate Change Commission was modelled largely on the UK Climate Change Committee, and our first set of advice on emission budgets and the direction of policies to meet them will need be finalised early next year. Alongside this advice, our Climate Change Minister has requested that we also provide advice on two issues relevant to New Zealand's climate



change policies and targets:

- The level of cuts to emissions of methane that might eventually be required of New Zealand as part of a global effort to keep warming to 1.5 degrees
- Whether New Zealand's Nationally Determined Contribution under the Paris Agreement is compatible with keeping warming to 1.5 degrees (and if not how it should change to become compatible).

To help inform our advice on these questions, we would like to contract you to do a short report on global pathways consistent with keeping warming to 1.5 degrees, and the tradeoffs and choices available within those pathways – particularly as they relate to long-lived vs short-lived gases. It would likely be 1-2 weeks work over the next 4-8 weeks, and would draw heavily on existing analysis.

Is that something you are interested in discussing with us further, and would you have availability to do it?

If you are interested in hearing more about it I will be happy to send you some more detailed information and perhaps we could arrange a video call to discuss it.

Kind regards

s 9(2)(a)

EDDA4B20





s 9(2)(a)

W [climatecommission.govt.nz](http://climatecommission.govt.nz)

[UNCLASSIFIED]

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**From:** s 9(2)(a)  
**To:**   
**Cc:**   
**Subject:** [UNCLASSIFIED] ETS team / Commission meeting 3.30pm 10 August  
**Date:** Tuesday, 4 August 2020 5:11:03 pm  
**Attachments:** [image001.png](#)

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[UNCLASSIFIED]

Hi s 9(2)(a)

As just discussed, we're keen to catch up with you (and anyone else relevant from the ETS teams) in connection with the work we're doing on the NDC. A meeting at 3.30pm next Monday 10 August would be great. We're interested in updates from your perspective on:

- prospects for offshore mitigation and how the purchasing of it might be planned for / managed / handled, including in terms of interactions with the ETS
- financial accounting for the NDC & ETS

There's also a couple of other issues related to emissions budgets & 2050 target accounting that I'd like to check in with you about (voluntary offsetting & metrics), if there's time.

Cheers

s 9(2)(a)



s 9(2)(a)

[climatecommission.govt.nz](https://climatecommission.govt.nz)

[UNCLASSIFIED]



**From:** s 9(2)(a)  
**To:** [REDACTED]  
**Subject:** RE: [UNCLASSIFIED] Seeking Croissant  
**Date:** Friday, 2 October 2020 5:04:00 pm  
**Attachments:** [image001.png](#)

s 9(2)(a) [UNCLASSIFIED]  
 Thanks (a) that sounds great!  
 Let me just talk to our engagement folks and we can tee up a time.  
 Cheers  
 s 9(2)(a)

[UNCLASSIFIED]  
**From:** s 9(2)(a) @mfe.govt.nz>  
**Sent:** Friday, 2 October 2020 3:50 pm  
**To:** s 9(2)(a) @climatecommission.govt.nz>  
**Subject:** RE: [UNCLASSIFIED] Seeking Croissant  
 Hi s 9(2)(a)

Yes, I am the correct point of contact, and we would love to help.  
 Would it make sense to set up an onsite demo and a practice run?  
 Perhaps we can do something in the next week or so...  
 Have a great weekend.

s 9(2)(a)

**From:** s 9(2)(a) @climatecommission.govt.nz>  
**Sent:** Friday, 2 October 2020 3:44 pm  
**To:** s 9(2)(a) @mfe.govt.nz>  
**Subject:** [UNCLASSIFIED] Seeking Croissant

[UNCLASSIFIED]  
 Hi s 9(2)(a) s 9(2)(a)  
 I am looking to set up the Climate Commission with Croissant, the tool that s 9(2)(a) and her colleagues developed s 9(2)(a) tells me you're the person to talk to about it? (You and I met briefly in its development – I'd introduced s 9(2)(a) and you when I was at MfE when she mentioned she and some friends at the Service Innovation Lab were developing something) We will be consulting from early Feb next year and our engagement people were thinking of using Nvivo – I thought they should give Croissant a try first given that I recalled from some of the early conversations that it's a bit more flexible and open.

Cheers

s 9(2)(a)

EDDA4B20



s 9(2)(a)

W [climatecommission.govt.nz](https://climatecommission.govt.nz)

[UNCLASSIFIED]

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