

OIA Ref: 2022-013

[REDACTED]

9 September 2022

Tēnā koe [REDACTED]

Thank you for your email of 15 August 2022 requesting under the Official Information Act 1982 (the Act):

1. *As copied from the Report, Section 5 on page 16;
Section 5: How are emissions calculated?
The single centralised emissions calculator will enable a consistent calculation across all farms, and will be designed to integrate data from existing calculators and other farm data sources.
5.1 Emissions will be calculated using a single centralised calculator (or through existing tools and software that are linked to the centralised calculator).
5.2 Methane will be calculated by weight of gas and nitrous oxide and carbon dioxide emissions will be calculated in carbon dioxide equivalents (CO₂ e).
5.3 The calculator will have two methods – simple and detailed.
5.4 Emissions and sequestration will be reported and paid for annually with a flexible year-end date that aligns with a farm's annual tax accounts.
5.5 Establishment of a process for updates to the centralised calculator including incorporation of new mitigations or sequestration opportunities.
5.6 Prior to implementation of the pricing system, further work is required on the emissions reporting methodology for the minor livestock sectors including, deer, dairy goats, pork, poultry, and sheep milking.
The proposed levy is not now based on a farms "foot print", but may be determined by calculation, using a 'single centralised calculator'.
Who will oversee the accuracy and fairness of the results of this 'calculator'?*
2. *You confirm there is a green house gas inventory and that the next GHG inventory will be released in April 2023.
Who updates and maintains the inventory?
How does the CCC check and confirm that the inventory is accurate?*
3. *Please provide your physical evidence to confirm your statements, that;
a) "Every tonne of methane that is emitted contributes to global warming"?
b) "Methane emissions keep the planet a lot warmer than it would be otherwise"?
c) "Bringing global carbon dioxide emissions to net zero by 2050 is vital to limit temperature increases to 1.5°C"?*

4. How will "all emissions from the Agriculture and Waste sectors" be determined?
As the emissions recorded for the GHG inventory.
5. Why if the emissions from ALL Agriculture sectors includes poultry and goats, why then not include the five million humans in NZ. Humans that breath out at least 4% CO2?
6. You have stated that the 23% difference noted in the Zero Carbon Act equates 'to 7708 kt CO2-e, or 308 kt of methane.
The Act refers to just methane so why do you also now include carbon dioxide?
7. Please confirm the source of your figures; "7708 kt CO2-e, or 308 kt of methane"
What then is the equivalence of these figures to either ppm (parts per million) of Kt.?
8. If the methane in our atmosphere changes by say 10% (ie 0.000019% of all GHGs), then what is the "major impact" of this 10%?
Plus what is your scientific based evidence that methane will have a "major impact"?
It is reported that by calculations, the sensitivity of methane is just 0.06°C.
This quote from the paper "The Impact of CO2, H2O and Other 'Greenhouse Gases' on Equilibrium Earth Temperatures", published on 23 August 2021 in the International Journal of Atmospheric and Oceanic Sciences, which paper has never been refuted, may help;
"The contribution of CH4 and N2O is miniscule. Not only have they contributed a mere 0.3Kelvin to current earth temperatures, their climate sensitivities to a doubling of their present atmospheric concentrations are 0.06 and 0.08 Kelvin respectively."
9. You have advised that it is not within the Commission's role to "independently audit valid information" from other than the IPCC.
Given that the IPCC is on record as having willfully ignored its own Error Reporting Protocol on four occasions, how then does the CCC confirm that the IPCC reports based on modeling is in fact scientifically accurate and valid before you make recommendations to Government?
10. How then can you also say that " we do not consider that any other organisation is likely to hold information" related to my final question?

Finally I add that Section 11 of NZ's Fair Trading Act 1986 states that 'no person shall, in trade, engage in conduct that is liable to mislead the public as to the nature, characteristics, suitability for a purpose, or quantity of services'. I believe that Section 11 of the NZ's Fair Trading Act 1986 applies to the Directors of CCC, a consulting organisation that advises the Government. If you disagree with me that this Act applies to the Climate Change Commission, please explain how and why you do not agree.

In preparing a response to your request we identified that part 1, the first part of part 2, and parts 3-8 were better aligned with the function of the Ministry for the Environment (MfE). Therefore, those parts of the request were transferred to MfE on 24 August 2022 under section 14 of the Act, as per our letter to you of 19 August 2022 indicated.

The Commission will respond to the second part of part 2, part 9, part 10, and the final part of your request.

Regarding the second part of part 2 of your request, there are established quality control systems that govern the production and updating of the greenhouse gas inventory by government agencies. The Commission relies upon these systems and bases its analysis on the published versions of the inventory. If any significant errors or changes are subsequently reported in published versions of the inventory, the Commission assesses whether these changes are material for the Commission's advice and updates our advice accordingly if necessary.

In terms of part 9, the information on nitrous oxide provided in our response to you on 12 August, was provided by MfE for inclusion as advised.

Our response regarding not independently auditing information from other organisations referred specifically to information provided to a correspondent by other organisations as part of an Official Information Act response.

More broadly, the Commission does not independently audit information from other organisations, including the IPCC. We draw upon multiple sources to build up our body of evidence and rely on the established quality control systems established by expert organisations as we build up that evidence.

If any significant errors or updates are subsequently reported in information we have drawn upon, we will assess whether these changes are material for the Commission's advice and update our advice accordingly if necessary.

In answer to part 10 of your request, to clarify our position, although the IPCC may hold the information on nitrous oxide that MfE drew upon, the IPCC is not an 'organisation' under section 2 of the Official Information Act 1982, and therefore not subject to the Act. Therefore, it is the Commission's view that it is correct to say that no other organisation is likely to hold the information.

Regarding the last part of your request, you have asked whether the Fair Trading Act 1986 applies to the Commission's Directors. This asks the Commission to form an opinion or provide an explanation. This would amount to the Commission generating new information which it is not required to do under the Act. Therefore, this part of your request is refused under section 18(g) of the Act as this information is not held by the Commission.

You have the right to seek an investigation and review by the Office of the Ombudsman of this decision, in accordance with section 28(3) of the Official Information Act 1982. The relevant details can be found on their website at: www.ombudsman.parliament.nz.

Please note that the Commission has a policy of proactive release of OIA responses to help others have access to more information.

As a result, this letter will shortly be published on the Commission's website with your name and contact details removed to protect your privacy.

Ngā mihi

A handwritten signature in blue ink, appearing to read 'Astrid Nunns', with a large, stylized initial 'AN'.

Astrid Nunns
General Manager
Strategy, Engagement and Corporate Services