



23 November 2021

Ministry for the Environment
Manatū Mō Te Taiao
PO Box 10362
Wellington 6143
email: climateconsultation2021@mfe.govt.nz

Re: Ministry for the Environment 2021 Te hau mārohi ki anamata | Transitioning to a low-emissions and climate-resilient future: Emissions reduction plan

About the New Zealand Society of Anaesthetists (NZSA)

The NZSA is a professional medical education society which represents over 750 anaesthetists in New Zealand. Our members include specialist anaesthetists in public and private practice, and trainee anaesthetists. Our key roles are advocacy, facilitating and promoting education, and strengthening networks of anaesthetists nationwide.

Comments

The NZSA welcomes the opportunity to provide input into the Government's Emissions Reduction Plan, due in May 2022, which sets out policies and strategies for meeting emissions budgets for Aotearoa New Zealand for the next 15 years.

The NZSA endorses the statement from Ora Taiao (NZ Climate and Health Council), with respect to the first emissions reduction plan. There are some specific points which we wish to emphasise:

- When health and wellbeing are used as measurable outcome criteria, good regulation and strategies will follow. What is good for the environment is almost universally good for human health. We are therefore disappointed that very few of the proposals in the draft emissions plan have regard for either the effects of climate change on health or, more importantly, the health and wellbeing co-benefits from well-designed climate action. Health is barely mentioned in the entire document. Healthcare often gets a free pass with respect to pollution and resource depletion. Decarbonisation of healthcare will be difficult, more so than in many other industries. Healthcare (~ 7% of GDP, and a similar fraction of the nation's carbon footprint) must be included in emission reduction plans from the beginning. As the Minister of Climate Change says in his introduction to the plan, "the final emissions reduction plan needs to pull together the collective effort of every part of Aotearoa." The health sector is an essential part of this collective effort.

- Healthcare is relatively insulated from the eight Ministry for the Environment workstreams. Replacing fossil fuels with electric cars is not an ambitious way to decarbonise transport from a public health perspective. Public hospitals get electricity at extraordinarily low tariffs, and to date hospitals have not been motivated by any factors other than by price. Hospital waste is tricky to manage, and small increases in landfill levies will only have tiny effects on behaviour. New hospital buildings provide for some optimism, but the strategy for a circular economy must deal with an industry which is founded on single-use disposable items.
- We have concerns for those who will be disadvantaged by changes due to carbon emissions reduction, exacerbating existing inequities. Our recommendation to advisors, policymakers and lawmakers is that all emissions reduction paths need a guardrail to ensure a corresponding reduction in inequality. An equitable transition strategy is essential. We support the Climate Change Commission's recommendation to develop an Equitable Transitions Strategy that addresses areas such as partnership with iwi/Māori, proactive transition planning, and minimising unequal impacts in all new policies. Every part of this plan must be based in te ao Māori and Tiriti o Waitangi partnership – resourced and representative, and with Māori leadership to the fore. There is also an opportunity to work with the Māori Health Authority to realise these aims.
- As OraTaiao recommends, health expertise must be represented in those agencies which are planning our climate change response.
- There is surprisingly little mention of the Carbon Neutral Government Program in the ERP (pp.33 and 92). The CNGP looks like it could be a powerful incentive to ensure Crown Entities reduce their emissions, assuming it is not watered down and is applied as described. We are supportive of the CNGP, and the inclusion of health-related crown entities to abide to the CNGP.
- In the ERP's section on transport, air travel is glossed over with all the focus on land vehicles. Air travel is largely for the relatively well off and is a legitimate target for emissions reductions. Our DHBs have a high use of air travel.
- There are two underlying issues which need to be addressed in the document:
 1. Consumerism and our focus on GDP, both of which drive emissions and waste. A statement supporting a strategy of transitioning towards more sustainable, non-material-based measures of societal success should be included.
 2. Controlling the ability to generate emissions and waste. Aotearoa New Zealand should commit to the fossil fuel non-proliferation treaty to address the supply of carbon emitting fossil fuels (<https://fossilfuel treaty.org>).



In summary, we recommend that the Government be more inclusive, be more equitable, and with respect to healthcare, more ambitious.

Yours sincerely

A handwritten signature in black ink, appearing to read "Sheila", is centered on a light blue rectangular background.

Dr Sheila Hart
NZSA President