

SUBMISSION TO  
THE CLIMATE CHANGE COMMISSION  
on

***Draft advice on the fourth emissions  
budget (2036 – 2040)***

***Review of the 2050 emissions reduction  
target***

***Review on whether emissions from  
international shipping and aviation should  
be included in the 2050 target***

From The New Zealand Deer Farmers'  
Association



31 May 2024

Contact for this submission:

Mark McCoard  
Chair, Executive Committee  
New Zealand Deer Farmers' Association  
P O Box 10702  
Wellington 6143

Phone: 021 848 335  
Email: [m.mcoard@hotmail.com](mailto:m.mcoard@hotmail.com)

Lindsay Fung  
Producer Manager  
Deer Industry New Zealand  
P O Box 10702  
Wellington 6143

027 668 0141  
Lindsay.Fung@deernz.org

## 1. Introduction

- 1.1 The New Zealand Deer Farmers' Association (NZDFA) welcomes the opportunity to make a submission to the Climate Change Commission (CCC) in response to the:
  - Draft advice on the fourth emissions budget (2036 – 2040).
  - Review of the 2050 emissions reduction target.
  - Review on whether emissions from international shipping and aviation should be included in the 2050 target.
- 1.2 New Zealand is the world's largest producer of farmed deer. The main products marketed from deer are venison and deer antler velvet and approximately 95% of products are exported. Based on data gathered by Stats NZ, in the year ending December 2023, deer products (excluding skins and petfood) were worth \$340 million in export receipts to New Zealand; the national herd was estimated at 741,598 deer.
- 1.3 The NZDFA is a voluntary subscription-based Incorporated Society (established in 1975) and acts as an industry-good body, established to represent the interests of New Zealand deer farmers, families and staff and to promote and assist the development of the deer farming industry in New Zealand.
- 1.4 The NZDFA has over 1000 members representing all deer farmers. It is nationally represented by a four-person Executive Committee (including the NZDFA Chairman) and regionally through 16 branches as well as special interest groups.
- 1.5 The industry is the youngest pastoral-based industry in New Zealand (the first deer farm licence was issued in 1970) but provides diversified markets and additional revenue to and complementary land use with other pastoral farming industries. Indeed about 80% of deer farmers also farm other livestock species and/or arable crops.
- 1.6 The deer industry shares concerns with all the other pastoral-based industry bodies but has particular affinity with the sheep and beef industry as:
  - i. Deer farms tend to be multi-species;
  - ii. products derived from deer farms are similar (venison alongside beef and lamb, annual velvet harvesting alongside wool);
  - iii. deer farms occupy the same land classes and run similar production systems (breeding, venison finishing/velvet) and have similar levels of inputs.
- 1.7 For this reason, this submission is confined to issues that will particularly impact on deer farming, and in particular **fully supports the submission from Deer Industry New Zealand (DINZ) and Beef + Lamb New Zealand (B+LNZ).**

## 2. Part 1: Review of the Climate Change Response Act (CCRA) emissions reduction targets

### Approach to assessing how the current 2050 target and Aotearoa New Zealand's national circumstances.

2.1 NZDFA fully supports the DINZ and B+LNZ position:

- We do not agree with how the CCC has interpreted the purpose of the CCRA to assess the current target's contribution to global warming. This is because the principles used are meant to determine an international (not domestic) emission reduction target.
- We suggest that alternative analysis is completed focusing on domestic fairness/burden sharing principles.

### Changes to review criteria and their significance

2.2 NZDFA fully supports the DINZ and B+LNZ position:

- We do not believe that the change in the criteria highlighted by the CCC justifies an increase in ambition of the targets. This includes a change to technological developments in methane inhibitors as indicated by the CCC. **These technologies are not suitable to our deer farming pastoral system** which are particularly limited in other tools or technologies that can be adopted.

### Other issues or impacts to consider and prioritise when changing/reviewing the 2050 target

2.3 NZDFA fully supports the DINZ and B+LNZ position:

- Agriculture is vital for food security, production, climate resilience, and achieving global sustainability goals. Changing the emissions reduction targets will have a significant impact on our farmers.
- We need to change current targets to:
  - reflect the different warming impacts of greenhouse gas emissions,
  - ensure different types of greenhouse gas emissions reductions have the same impact on the atmosphere (i.e. no additional warming),
  - balance emissions and removals in a way that reflects our best scientific understanding,
  - consider the equity and distributional impacts of the targets,
  - allow for net reductions of biological emissions, and
  - reflect the Paris Agreements prioritisation of food security and production.

2.4 NZDFA highlight the equity and distributional impacts of the targets and consider that deer farming will be disproportionately impacted by reduction targets that are not equitable. This is because deer farming incurs greater costs of production compared with other livestock farming systems (e.g. due to high fencing costs, requirement for specialised sheds and other more expensive deer specific requirements).

- 2.5 Coupled with a lack of mitigation tools or practices this will create disproportionate financial costs despite deer offering a complementary and optimal land use, diversified income and an otherwise low environmental impact due to the extensive rather than intensive production farming system.
- 2.6 We also note that DINZ and B+LNZ highlight the impact of carbon forestry on sheep, beef and deer farms and a resulting reduction in national stock numbers. NZDFA adds that the impact is wider than just at a personal farm level. It affects rural service businesses, schools, health care services and communities. Additionally, the loss of GDP (and export earnings) will take time to be apparent at a national level and be very difficult or impossible to reverse (once the land is planted in trees it is more difficult to convert to pasture).
- 2.7 Our final observation on equity and impacts is that the New Zealand deer industry is perhaps at best only 2 % of the pastoral industries' emissions in New Zealand: A very small contributor to greenhouse gas emissions (be they pastoral, primary sector, national or global). Given the impact of our industry on world methane emissions and global warming we would consider the negative financial impact on our industry and individual farmers far outweighs any greenhouse gas reduction we could achieve in order to reduce global warming. The means does not justify the outcome.

### **3. Part 2: Draft Advice on Emissions Budget 4 (2036-2040)**

- 3.1 NZDFA notes that there are significant differences in B+LNZ's analysis and the CCC's impacts analysis of emissions reductions and afforestation expectations.
- 3.2 NZDFA strongly urges the CCC to discuss these differences with B+LNZ and DINZ.

### **4. Part 3: Inclusion of International Aviation and Shipping emissions in CCRA emissions reduction targets**

- 4.1 NZDFA fully supports the DINZ and B+LNZ position (noting this is in support of the Meat Industry Association's submission):
- New Zealand should not include international shipping and aviation in our 2050 emission targets. Doing so, would cause an unfair and unnecessary strain on our export economy and red meat products.