



12 April 2022

Hon. James Shaw  
Minister for Climate Change

Dear Minister,

To help all New Zealanders understand and play their part in the global effort under the Paris Agreement to limit the global average temperature increase to well below 2 degrees Celsius, while pursuing efforts to limit the increase to 1.5° Celsius above pre-industrial levels, we ask that the Government fully adopt a split gas approach to monitoring and reporting on this country's emissions. The current GWP100 based aggregate reporting misconstrues the relative warming contributions of different gases.

We refer you to the recent report by 33 respected scientists in the prestigious [Nature Journal](#), which recommends recognising the separate contributions to global warming of long-lived and short-lived gases when setting targets and monitoring progress.

New Zealand already has split gas targets, recognising the different impact of long-lived and short-lived gases on the ultimate goal of limiting global warming to 1.5 degrees.

However, our country still monitors progress by aggregating emissions using the GWP100 metric to convert all emissions to Carbon dioxide equivalent (CO<sub>2</sub>-e), which the recent Intergovernmental Panel on Climate Change (IPCC) report noted provides an inaccurate comparison on warming contribution.

In particular the IPCC stated that GWP100 overstates the warming impact of methane by a factor of 3-4, if methane is stable and understates the warming impact of an increase in methane by 4-5 times over a 20-year period. GWP100 is even more inaccurate if methane is reducing.

Using the GWP100 aggregated emissions approach currently results in a finding that agriculture in New Zealand accounts for 48 percent of emissions. It does not give any indication that the actual contribution of this country's methane emissions differs considerably from that of carbon dioxide when it comes to the contribution to global warming pathways.

A national inventory where 48 percent of emissions are agricultural greenhouse gases does not equate to being a country where 48 percent of our contribution to temperature increase is derived from agriculture. It is important that the general public understand this.

Failing to consider the warming impact differences puts us at risk of overestimating the methane reductions we need to make as a country and creating unnecessary social and economic impacts as a result.

It also means New Zealanders are not getting accurate or transparent information on which to base decisions about their own actions or actions that affect them.

We ask you to instruct (and legislate for where appropriate) Government agencies, and independent bodies such as the Climate Change Commission, to take a split-gas approach for all reported emissions, and emissions budgets, to clearly demonstrate that short-lived and long-lived gases are not equivalent in warming impact.

When taking a split gas approach, we ask that the weight of the GHG be used for short-lived emissions and that the net and gross CO<sub>2</sub>-e figure be used for long lived emissions.

We strongly support increased efforts to ensure all New Zealanders have a science-based understanding of the different atmospheric warming impacts of short lived and long-lived emissions and therefore understand the current, and proposed future, warming impacts of various GHGs.



Such an approach would not preclude reporting total emissions using GWP100 to the IPCC, but would rather involve providing additional context to compliment reported emissions totals that would improve consistency with the split gas approach taken to domestic emissions reduction targets.

As the authors of the Nature Journal report say: “making progress on two fronts necessitates monitoring progress on two fronts”.

Our sector remains committed to doing our fair share to limit global warming and are seeking transparent and accurate information that will help all New Zealanders understand what a ‘fair share’ is.

We’d be pleased to work with the Government on what specific legislative and regulatory changes would help improve transparency with the warming impact of various GHGs, increasing consistency with the split gas approach taken for emissions reduction targets in the Climate Change Response Act.

Yours sincerely

Andrew Morrison  
**Chairman**  
**Beef + Lamb New Zealand**

Jim van der Poel  
**Chairman**  
**DairyNZ**

John Loughlin  
**Chairman**  
**Meat Industry Association**

Andrew Hoggard  
**National President**  
**Federated Farmers**

Malcolm Bailey  
**Chairman**  
**Dairy Companies Association of New Zealand**

Ian Walker  
**Chairman**  
**Deer Industry New Zealand**

cc:

- Hon. David Parker, Minister for the Environment
- Hon. Damien O'Connor, Minister of Agriculture
- Hon. David Clark, Minister of Statistics
- Hon. Stuart Nash, Minister of Forestry