OFFICIAL

CCPI
Climate Change
Performance Index

New Zealand

CCPI Rank		2025
Country	CCPI 2024	**CCPI 2025**
▼ New Zealand	34	41

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New Zealand falls seven places to rank 41st in this year's CCPI, remaining an overall *low* performer. The country rates *high* in Renewable Energy, *low* in Climate Policy, and *very low* in GHG Emissions and Energy Use.

A new government was elected in October 2023, and the CCPI country experts note that it has taken significant backwards steps in climate policy. It is unclear how New Zealand will meet its international climate obligations or its 2050 emissions reduction target. Concerningly, the country's independent Climate Change Commission has warned that the country is not on track to meet this target.

50% of the country's GHG emissions come from the agricultural sector

The Climate Change Response Act 2002, amended in 2019 following the Paris Agreement, is the overarching legislative framework in New Zealand. Key features include a target for net zero GHG emissions (excluding biogenic methane) by 2050 and emissions budgets every five years accompanied by Emissions Reduction Plans. New Zealand is on track to meet the current emissions budget (2022–2025) and is finalising a plan for meeting the next one (2026–2030). The framework remains unchanged under the new government; however, critical ring-fenced emissions reduction funding (Climate Emergency Response Fund) has been reappropriated to support other, unrelated initiatives.

New Zealand has an Emissions Trading Scheme (ETS) that covers most emitting sectors and that the experts see as the only real regulatory tool for reducing GHG emissions. However, around 50% of the country's GHG emissions come from the agricultural sector, which is not included in the ETS, and the new government is further extending the timeframe for including agriculture in the ETS. It was due to be included from 2025 and is now being pushed back to 2030. Because agriculture is such an important sector, the experts also criticise the net zero target of the Climate Change Response Act, which excludes biogenic methane. The experts criticise the government's reliance on international emissions trading to meet its current NDC, and that the ETS treats GHG emissions and removals equally – this has led to excessive exotic afforestation instead of gross emissions reductions. The experts are also concerned that the government is considering amending New Zealand's domestic biogenic methane reduction target. This amendment would result in less ambitious methane reductions and effectively give New Zealand a license to continue its high rate of methane emissions.

Very little new renewable generation has been built in a decade

Most (80–85%) of New Zealand's electricity is generated from renewable sources, but this is because of historical reliance on large hydroelectric dams rather than intentional climate policy. Very little new renewable generation has been built in a decade and the new government has pledged to lift the 2018 ban on new offshore oil and gas exploration. The experts condemn the absence of plans to phase out producing or consuming oil, gas, and coal. The government is also introducing a new fast-track law to bypass environmental regulations and public consultation, including allowing development of new coal mines. It also had proposed fast-tracking a new liquefied natural gas import facility.

The experts criticise the new government for cutting most of the transport policies that were modelled to deliver the largest GHG emissions reductions in the sector. The government has reduced spending on public transport while increasing spending on road building. Support for electric and low-emission vehicles also has been removed.

Internationally, the experts note that while New Zealand is still operating under a progressive and ambitious NDC following the Paris Agreement, there is no clear plan for meeting the NDC. In plans for meeting it thus far, New Zealand relies most heavily of all Paris Agreement parties on offshore mitigation. New Zealand also is an associate member of the Beyond Oil and Gas Alliance (BOGA) and a member of the Global Methane Pledge, though it may no longer meet the BOGA membership criteria and risks being ejected. The country provides climate resilience funding to the Pacific region, but less than what the experts deem appropriate for the country. Moreover, that climate finance budget allocation expires in 2025 and may not be renewed.

The experts recommend that New Zealand maintain its offshore oil and gas ban and significantly amend or scrap the fast-track law for bypassing environmental regulations. GHG emissions reductions should be more ambitious overall, without relying heavily on offsets. The experts also call for greater consideration of agricultural GHG emissions, particularly those from the intensive dairy industry, including them in the ETS.

Key Outcomes

- New Zealand falls seven places to rank 41st in this year's CCPI, remaining an overall low performer
- Very little new renewable generation has been built in a decade and the new government has pledged to lift the 2018 ban on new offshore oil and gas exploration
- Key demands: GHG emissions reductions should be more ambitious overall, without relying heavily on offsets. The experts also call for greater consideration of agricultural GHG emissions, particularly those from the intensive dairy industry.

CCPI Experts

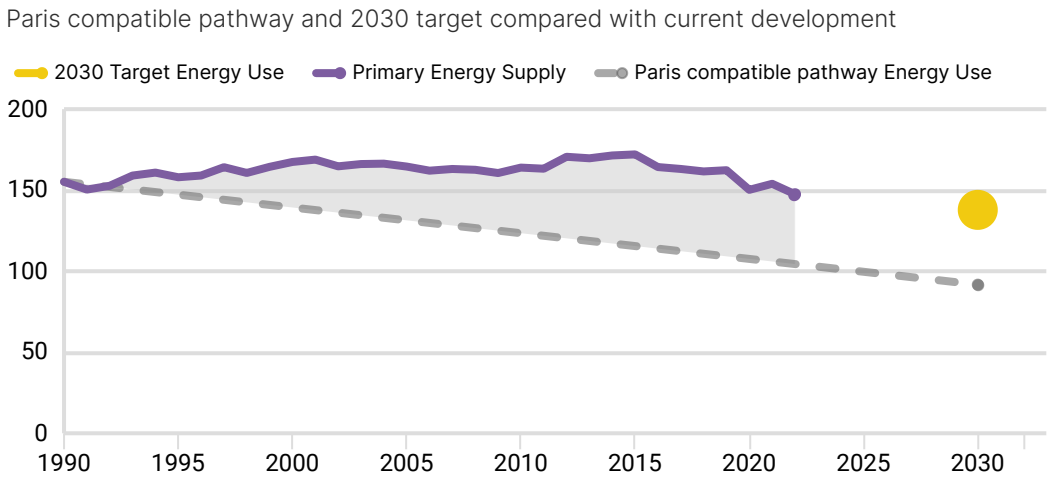
- Dr Kayla Kingdon-Bebb (WWF-New Zealand)
- Lawyers for Climate Action NZ
- David Tong (Oil Change International)

Key Indicators

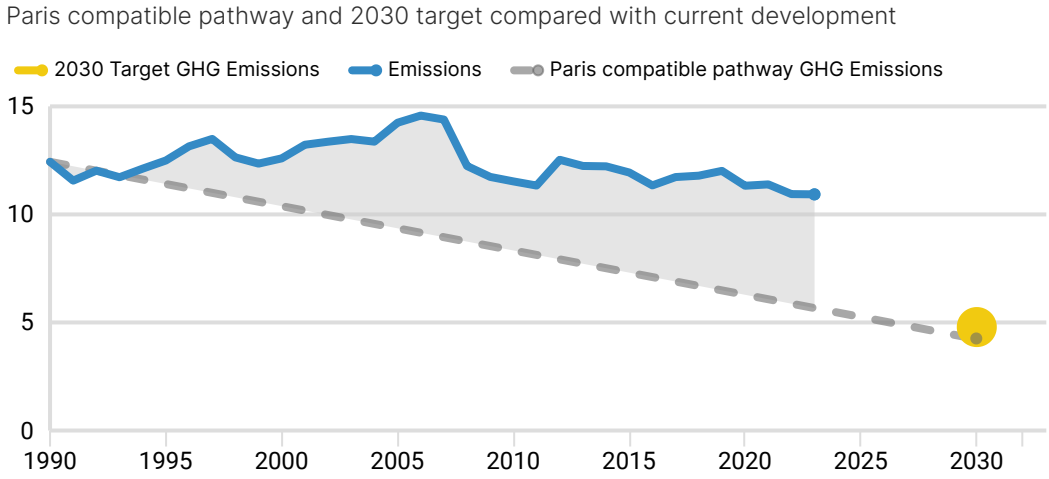
Indicators	Weighting	Rating	Rank	Change
Overall	**100%**	**Low**	**41**	**–7**
GHG Emission	**40%**	**Low**	**49**	
GHG per Capita - current level (including LULUCF)	10%	Very Low	53	
GHG per Capita - current trend (excluding LULUCF)	10%	High	24	
GHG per Capita - compared to a well-below-two-degrees benchmark	10%	Very Low	54	
GHG 2030 Target - compared to a well-below-two-degrees benchmark	10%	Medium	28	
Renewable Energy	**20%**	**High**	**6**	
Share of Renewable Energy in Energy Use (TPES) - current level (including hydro)	5%	Very high	4	
Renewable Energy - current trend (excl. hydro)	5%	Low	54	
Share of Renewable Energy in Energy Use (TPES) (excl. hydro) - compared to a well-below-two-degrees benchmark	5%	Medium	8	
Renewable Energy 2030 Target (including hydro) - compared to a well-below-two-degrees benchmark	5%	High	8	
Energy Use	**20%**	**Very Low**	**49**	
Energy Use (TPES) per Capita - current level	5%	Low	49	
Energy Use (TPES) per Capita - current trend	5%	High	13	
Energy Use (TPES) per Capita - compared to a well-below-two-degrees benchmark	5%	Very Low	50	
Energy Use 2030 Target - compared to a well below two-degrees-benchmark	5%	Very Low	51	
Climate Policy	**20%**	**Low**	**56**	
National Climate Policy	10%	Very Low	59	
International Climate Policy	10%	Low	51	

CCPI 2025: Target comparison

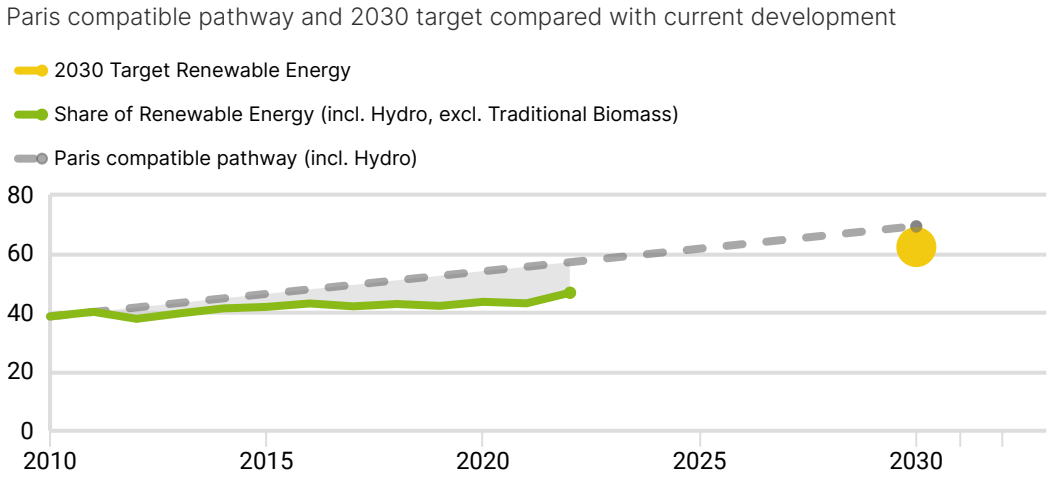
Energy Use per Capita (GJ)



GHG emissions per capita (t CO2 eq., incl. LULUCF)



Share of Renewable Energy (in % of TPES)



For more information on how to read the target comparison graph please visit our website https://ccpi.org/faqs, where you can also find all other country texts https://ccpi.org/countries/.

This is the Appendix marked 'A' referred to in the affidavit of Ivo Geoffrey Bertram sworn at Wellington this 26 day of August 2024 before me:

R. M. Renata

Raphael Renata

Deputy Registrar of the High Court of New Zealand

Appendix: Statement of New Zealand's emission reduction targets from the *Fifth Biennial Communication*[92] pages 23-30

2.2 New Zealand's Targets

Aotearoa/New Zealand has committed to the following international and domestic emissions reduction targets.

International targets
2030 target (2021–30)

Under the Paris Agreement, New Zealand has set a headline target for NDC1 to reduce net greenhouse gas emissions to 50 per cent below gross 2005 levels by 2030. The NDC1 target is economy-wide, covering all sectors and all greenhouse gases.

2020 target (2013–20)

New Zealand's 2020 target is to reduce gross GHG emissions to 5 per cent below 1990 levels over the period 1 January 2013 to 31 December 2020.

This target is taken under the United Nations Framework Convention on Climate Change (UNFCCC) while applying the Kyoto Protocol framework of rules. This means we can meet this target through a combination of reducing our emissions, eligible forestry activities and offshore mitigation.

We are on track to meet this target based on the 2022 submission of *New Zealand's Greenhouse Gas Inventory*. This will be formally confirmed following the completion of the international expert review process.

2012 target (2008–12)

In 2015 New Zealand confirmed we had met our 2012 target for the first commitment period of the Kyoto Protocol. This was to reduce greenhouse gas emissions to 1990 levels between 2008 and 2012. New Zealand's 'True-up report' to the UNFCCC9 provides detail on how the target was met.

Domestic targets
In 2019, the Climate Change Response Act 2002 (CCRA) was amended to include new domestic
emissions reduction targets. These legislated targets require:

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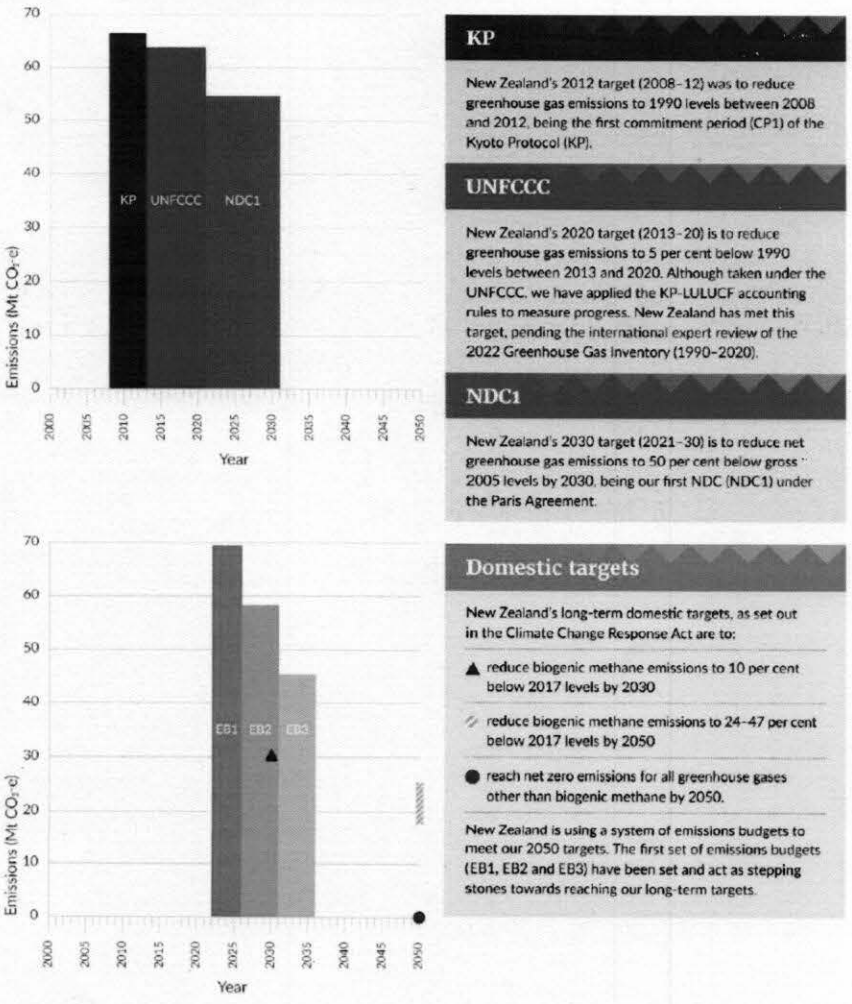
92 https://unfccc.int/documents/624723 accessed April 2024.

- all GHGs, other than biogenic methane, to reach net zero by 2050
- a minimum 10 per cent reduction in biogenic methane emissions by 2030, and a 24 to 47 per cent reduction by 2050 (compared with 2017 levels).

Figure 2.1 shows New Zealand's emissions reduction targets under the Kyoto Protocol for 2008–12 (KP) and under the UNFCCC for 2013–20, along with our first NDC under the Paris Agreement for 2021–30. Figure 2.2 shows New Zealand's domestic targets set under the CCRA[93].

Figure 2.1: New Zealand's emissions reduction targets



Note: The Kyoto Protocol (KP), United Nations Framework Convention on Climate Change (UNFCCC) and Nationally Determined Contribution (NDC) targets are displayed as multi-year budgets. The domestic targets under the CCRA are point-year targets; however, these targets will be achieved using a system of multi-year emissions budgets. GHGs = greenhouse gases; Mt CO_2-e = million tonnes of carbon dioxide equivalent. Budget periods cover the years 2022–25 for EB1, 2026–30 for EB2, and 2031–35 for EB3. Target and budget periods end at 31 December

Note: Shown applying the 100-year time-horizon global warming potentials (GWP_{100}) from the IPCC Fourth Assessment Report (AR4) for comparability purposes.

93 [Figure 2.2 is missing from the document on the UNFCCC website.]

These targets are presented in further detail below.

2.2.1 New Zealand's 2020 target

New Zealand has a quantified economy-wide emission reduction target to reduce emissions to 5 per cent below 1990 gross GHG levels for the period 2013–20. With the submission of *New Zealand's Greenhouse Gas Inventory* (1990–2020) in April 2022, emissions are now reported for the full target period and, following the completion of its review, the final steps required to complete the accounting process will be undertaken. While the target for this period was taken under the UNFCCC, New Zealand has applied the Kyoto Protocol framework of rules.

Based on UNFCCC methodology, this 5 per cent below 1990 target was the equivalent of a Quantified Emission Limitation or Reduction Objective (QELRO) of 96.8 per cent on 1990 gross GHG emissions over the period 2013–20. New Zealand prepared an initial report in 2016 to facilitate the calculation of its exact emissions budget for 2013–20. Based on gross emissions in 1990, as reported in *New Zealand's Greenhouse Gas Inventory* submitted in 2016, this target corresponds to a commitment to reduce emissions to 509.775 million tonnes of carbon dioxide equivalent (Mt CO2-e) for the period 2013–20.

New Zealand has applied the Kyoto Protocol framework of rules in reporting and measuring progress towards its target for the period 2013–20 to ensure that its actions are transparent and have integrity. This includes applying Kyoto Protocol accounting rules that were agreed in Durban in 2011 for land use, land-use change and forestry (see Decision 2/CMP.7). For 2013–20, therefore, New Zealand has included emissions and removals from afforestation, reforestation and deforestation activities, and forest management activities.

See tables 2.1–2.5 (which present common tabular format (CTF) tables 2a–2f) for further information about this target.

Table 2.1: Emissions reduction target: base year and target[a] (CTF Table 2a)

Base year/base period	1990
Emission reduction target	5% below 1990 by 2020
Period for reaching the target	2013–20

Note:

[a] Reporting by a developed country Party on the information specified in the common tabular format (CTF) does not prejudge the position of other Parties with regard to the treatment of units from market-based mechanisms under the UNFCCC or other market-based mechanisms towards achievement of quantified economy-wide emission reduction targets.

Table 2.2: Description of quantified economy-wide emission reduction target[a] (CTF Tables 2b and 2c)

Gases covered	Base year	Global warming potential
CO_2	1990	IPCC Fourth Assessment Report
CH_4	1990	IPCC Fourth Assessment Report
N_2O	1990	IPCC Fourth Assessment Report
HFCs	1990	IPCC Fourth Assessment Report
PFCs	1990	IPCC Fourth Assessment Report
SF_6	1990	IPCC Fourth Assessment Report
NF_3	1990	IPCC Fourth Assessment Report
Sectors covered	**Comments**	
Energy		
Transport[b]		
IPPU		
Agriculture		
LULUCF	LULUCF is not included in the target's base year emissions	
Waste		

Note: CH_4 = methane; CO_2 = carbon dioxide; HFCs = hydrofluorocarbons; IPCC = Intergovernmental Panel on Climate Change; IPPU = industrial processes and product use; LULUCF = land use, land-use change and forestry; NF_3 = nitrogen trifluoride; N_2O = nitrous oxide; PFCs = perfluorocarbons; SF_6 = sulphur hexafluoride.

[a] Reporting by a developed country Party on the information specified in the common tabular format (CTF) does not prejudge the position of other Parties with regard to the treatment of units from market-based mechanisms under the UNFCCC or other market-based mechanisms towards achievement of quantified economy-wide emission reduction targets.

[b] Transport is reported as a subsector of the energy sector.

Table 2.3: Approach to counting emissions and removals from the LULUCF sector[a, b] (CTF Table 2d)

Role of LULUCF	Comments
Emissions and removals from the LULUCF sector are counted towards achievement of the target	The LULUCF sector is not included in the target's base year emissions
The contribution of the LULUCF sector is calculated applying an activity-based approach	Applying LULUCF accounting rules for the second commitment period of the Kyoto Protocol (ie, afforestation, reforestation and deforestation activities and forest management activities as agreed in Decision 2/CMP.7)

Note: LULUCF = land use, land-use change and forestry.

[a] Reporting by a developed country Party on the information specified in the common tabular format (CTF) does not prejudge the position of other Parties with regard to the treatment of units from market-based mechanisms under the UNFCCC or other market-based mechanisms towards achievement of quantified economy-wide emission reduction targets.

[b] All afforestation/reforestation and deforestation activities (Article 3.3) count towards New Zealand's target. Forest management is the only Article 3.4 activity that New Zealand includes in its target accounting quantity. New Zealand has not elected to account for any other Article 3.4 activities.

Table 2.4: Possible scale of contributions of market-based mechanisms[a] (CTF Table 2e)

CERs	NA
ERUs	NA
AAUs[b]	6,544,585
Carry-over units[c]	IE
Other mechanism units under the Convention (specify)[d]	NA

Note: AAUs = assigned amount units; CERs = certified emissions reductions; Convention = United Nations Framework Convention on Climate Change; ERUs = emissions reduction units; IE = included elsewhere; NA = not applicable.

[a] Reporting by a developed country Party on the information specified in the common tabular format (CTF) does not prejudge the position of other Parties with regard to the treatment of units from market-based mechanisms under the UNFCCC or other market-based mechanisms towards achievement of quantified economy-wide emission reduction targets.

[b] AAUs issued to or purchased by a Party.

[c] Units carried over from the first to the second commitment period of the Kyoto Protocol, as described in Decision 13/CMP.1 and consistent with Decision 1/CMP.8.

[d] As indicated in paragraph 5I of the guidelines contained in annex I of Decision 2/CP.17.

Table 2.5: Any other information (CTF Table 2f)

New Zealand is applying the Kyoto Protocol's second commitment period rules to its 2020 target. In practice, however, some technical changes may be required to reflect the status of New Zealand's target (as the target is not inscribed in the third column of Annex B of the Doha Amendment to the Kyoto Protocol). New Zealand reserves the right to review the accounting rules it applies to ensure alignment with the Kyoto Protocol and to support a smooth transition to the Paris Agreement.

2.2.2 Zealand's Nationally Determined Contribution

In 2021, the New Zealand Government updated its first NDC to align with the global efforts to limit global warming to 1.5°C above pre-industrial levels. New Zealand has set a target for NDC1 to reduce net greenhouse gas emissions to 50 per cent below gross 2005 levels by 2030.

The NDC1 target is economy-wide, covering all sectors and all greenhouse gases. New Zealand will report on the implementation and achievement of its NDC1 through the Paris Agreement's Enhanced Transparency Framework.

New Zealand's NDC, including a summary of the methodologies used to account for the land use, land-use change and forestry sector, can be found on the UNFCCC Secretariat's website. New Zealand's updated NDC1 of 50 per cent below gross 2005 levels by 2030 is expressed as a 'point-year target' for 2030. This corresponds to 41 per cent when managed using a multi-year emissions budget starting from New Zealand's 2020 emissions target and gross emissions estimates for 2005 as reported in *New Zealand's Greenhouse Gas Inventory* for 1990–2019.

This budget provisionally equates to 571 Mt CO2-e over 2021–30.

New Zealand will meet its emissions budget for the period 2021–30 through a combination of:

- absolute reductions in New Zealand's gross emissions, including all sectors and all GHGs
- net removals of carbon dioxide from eligible forestry activities, following the Kyoto Protocol framework of rules, modified for plantation forests
- offshore mitigation, through Article 6 of the Paris Agreement, ensuring environmental integrity, avoidance of double counting, and transparency, in line with the guidelines for international cooperation under Article 6 of the Paris Agreement.

To help New Zealand meet its NDCs, the CCRA was amended in 2019. For details, refer to chapter 4 of New Zealand's Eighth National Communication.

New Zealand will submit its national greenhouse gas inventory for the period 1990–2021 in April 2023, which will include inventory estimates for 2021, the first year of NDC1. New Zealand, along with other Parties to the Paris Agreement, will track progress towards our NDCs in our Biennial Transparency Reports, the first of which is due by 31 December 2024 at the latest.

In line with commitments under the Paris Agreement, New Zealand will continue to regularly review its contributions to international mitigation action, taking into account, inter alia, the latest science, the periodic stocktakes under the Paris Agreement, development of new technologies, progress by other countries and the commitments New Zealand has made.

2.2.3 Zealand's domestic targets

The Climate Change Response Act 2002 is New Zealand's primary climate change legislation. It provides the legal framework to enable New Zealand to meet its obligations under the UNFCCC, the Paris Agreement and the Kyoto Protocol. It also includes the framework for the New Zealand Emissions Trading Scheme.

In 2019, amendments to the CCRA introduced the Zero Carbon Framework. Under this framework, New Zealand can develop and implement climate change policies that:

- contribute to global efforts under the Paris Agreement to limit the global average temperature increase to 1.5°C above pre-industrial levels
- allow New Zealand to prepare for, and adapt to, the impacts of climate change.

The 2019 amendments:

- established He Pou a Rangi – Climate Change Commission (the Commission) to:

– provide independent advice to the Government on climate change mitigation and adaptation

– monitor and review the Government's progress towards meeting the emissions budgets and 2050 target, as well as the implementation of emissions reduction and national adaptation plans

- set new domestic emissions reduction targets for 2050
- established a system of emissions budgets to step New Zealand towards these 2050 targets
- require the development of an emissions reduction plan for each budget period that sets out the policies and strategies for achieving the emissions budget
- require the Commission to prepare a national climate change risk assessment every six years
- require the Government to develop a national adaptation plan that responds to the Commission's risk assessment.

As required by the CCRA, the Minister for Climate Change set New Zealand's first three emissions budgets for 2022–25, 2026–30 and 2031–35 in May 2022 (table 2.6).

Table 2.6: New Zealand's first three emissions budgets (Mt CO_2-e), 2022–35

	First emissions budget (2022–25)	Second emissions budget (2026–30)	Third emissions budget (2031–35)
All gases, net (AR5)*	290	305	240
Annual average	72.5	61.0	48.0

Note: * Emissions in million tonnes of carbon dioxide equivalent (Mt CO_2-e) are based on the 100-year time-horizon global warming potentials (GWP100) metric values from the Intergovernmental Panel on Climate Change's (IPCC) Fifth Assessment Report (AR5), as required under the Paris Agreement (Decision 5/CMA.3).

Sector sub-targets

For the first three emissions budgets, the Government has set sector sub-targets for key economic sectors.17 Sector sub-targets will help to track progress across these key sectors over each emissions budget period. Unlike emissions budgets, sub-targets are not legislated.

The Climate Change Chief Executives Board is responsible for monitoring and reporting on overall progress towards the emissions budgets, including sector sub-targets. This will involve advising on how to adjust policy settings to manage variances within – and between – sector sub-targets to support meeting the overall emissions budgets.