

All Aboard

March 6 2026

Re: Submission on the EECA Levy Funding Consultation 2026/27

To the team at the Energy Efficiency and Conservation Authority,

Thank you for the opportunity to submit on the proposed levy to fund the work of the Energy Efficiency and Conservation Authority (EECA).

All Aboard Aotearoa:

- Supports continuation of the levy and the general direction of EECA's work
- Has concerns about the Practical Consumer and Business Information Programme, and EECA's alignment with the Energy Efficiency and Conservation Act 2000

Overall, All Aboard Aotearoa supports the continuation of the levy and the general direction of EECA's work. New Zealand faces a significant challenge in improving energy efficiency and reducing emissions across the economy, and a well-resourced public agency with a mandate to drive this transition is essential. Stable funding through the levy enables EECA to maintain capability, develop programmes, and provide trusted guidance to households and businesses. The suggested quantum of funding from EECA is appropriate, as enabled by legislation.

However, All Aboard Aotearoa has significant concerns regarding the Practical Consumer and Business Information Programme and how EECA is interpreting its responsibilities under section 21 of the Energy Efficiency and Conservation Act 2000. In particular, All Aboard is concerned that the current approach places too much emphasis on individual behaviour change and consumer technology choices, rather than addressing the systemic drivers of energy demand.

Evidence from behavioural science and public policy research shows that programmes focused primarily on individual behaviour change often have limited impacts, and in some cases can even delay or undermine structural solutions that would produce larger and more durable energy savings. As highlighted in recent academic literature, focusing public attention on individual-level actions can divert attention from the system-level changes that are necessary for large-scale decarbonisation

(<https://www.cambridge.org/core/journals/behavioral-and-brain-sciences/article/iframe-and-the-e-sframe-how-focusing-on-individual-level-solutions-has-led-behavioral-public-policy-astray/A799C9C57F388A712BE5A8D34D5229A1>)

This concern is reflected in EECA's current public-facing information. For example, the household and business guidance on transport energy use focuses heavily on vehicle electrification. While electric vehicles have a role to play, this approach risks framing energy efficiency primarily as a matter of replacing individual technologies. Vehicle electrification is a

relatively slow, expensive, and in many cases inequitable pathway for improving transport energy efficiency.

By contrast, the most powerful levers for reducing energy use in transport are systemic: Enabling people and businesses to travel fewer kilometres by car, and shifting travel toward more efficient modes such as walking, cycling, and public transport. Infrastructure investments such as connected cycle networks and high-quality public transport services deliver far larger energy efficiency gains across the entire system. These changes also reduce household energy costs, improve accessibility, enhance resilience, and create wider social and economic benefits.

It is All Aboard's reading of the Energy Efficiency and Conservation Act 2000 that EECA's mandate is broad enough—and indeed strong enough—to support a much more system-oriented approach to energy efficiency information. Section 21 empowers EECA to encourage, promote, and support energy efficiency across the economy. In practice, this should include helping households and businesses understand *how energy use is shaped by infrastructure*, such as urban form and transport systems, and identifying the actions they can take to support and benefit from those changes.

In other words, EECA should not only inform consumers about energy-efficient technologies; it should also help New Zealanders understand how the wider energy system can be made more efficient, and what role they can play in supporting that transition.

All Aboard Aotearoa encourages EECA to expand the scope of the Practical Consumer and Business Information Programme to:

- Place greater emphasis on system-level energy efficiency, particularly in transport
- Highlight the role of mode shift, sustainable urban development, and transport infrastructure in reducing energy demand
- Provide guidance to businesses and households on how to support and benefit from these systemic changes, rather than focusing primarily on technology substitution and end-user behaviours
- Ensure public communications reflect the strong evidence base on what actually reduces energy use and emissions at scale: Changing the systems which determine individual economic decisions

Strengthening this aspect of EECA's work would better align the organisation's programmes with both the evidence on effective energy policy and the intent of the legislation under which it operates. It is also a necessary action to ensure that funding raised through the EECA energy levies is used responsibly, and that support for the levies is maintained.

Thank you again for the opportunity to provide feedback on the levy and EECA's work programme.

Warm regards,
Tim Adriaansen
Executive Director
All Aboard Aotearoa