

IN THE HIGH COURT OF NEW ZEALAND
AUCKLAND REGISTRY

CIV-2021-404-1618

I TE KŌTI MATUA O AOTEAROA
TĀMAKI MAKAURAU ROHE

UNDER the Judicial Review Procedure Act 2016

IN THE MATTER OF an application for judicial review

BETWEEN **ALL ABOARD AOTEAROA
INCORPORATED**
Applicant

AND **AUCKLAND TRANSPORT**
First respondent

AND **THE REGIONAL TRANSPORT
COMMITTEE FOR AUCKLAND**
Second respondent

Cont.

SUPPLEMENTARY AFFIDAVIT OF TIMOTHY RAYMOND NAISH

8 April 2022

Assigned judicial officer:

Next event date: Hearing on 26-28 April 2022

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AND

AUCKLAND COUNCIL

Third respondent

SUPPLEMENTARY AFFIDAVIT OF TIMOTHY RAYMOND NAISH

I, Timothy Raymond Naish, of Wellington, Climate and Earth Scientist, swear –

1. This is the second affidavit I have made in this proceeding.
2. In the period since I made my first affidavit, the IPCC has released two further reports that form part of the IPCC’s Sixth Assessment Report:
 - (a) The Working Group II contribution, *Climate Change 2022: Impacts, Adaptation and Vulnerability*, released on 28 February 2022; and
 - (b) The Working Group III contribution, *Climate Change 2022: Mitigation of Climate Change*, released on April 4 2022.
3. Alongside each report, the IPCC has released a Summary for Policymakers.¹
4. The reports use direct, strong and unequivocal language in headline statements to emphasise the urgency to mitigate climate change, to adapt to the impacts and hazards of climate change that cannot be avoided even if the goal of the Paris Agreement is achieved, and to be prepared to adapt to even higher levels of warming.
5. As the Co-Chair of the Working Group III report, Professor Jim Skea, said in the official IPCC press release on 4 April 2022: “It’s now or never, if we want to limit global warming to 1.5°C (2.7°F). Without immediate and deep emissions reductions across all sectors, it will be impossible.”²
6. And as the Co-Chair, Hoesung Lee, said in the same press release: “Without immediate and deep emissions reductions across all sectors, limiting global warming to 1.5°C is beyond reach. We are at a crossroads. The decisions we make now can secure a liveable future. We have the tools and know-how required to limit warming”.

SWORN at Wellington this 8th day of April 2022 before me:



Timothy Raymond Naish



A solicitor of the High Court of New Zealand

Samantha Ann Cawkwell
Solicitor of the High Court of New Zealand
Morrison Kent
Wellington

¹ https://report.ipcc.ch/ar6wg2/pdf/IPCC_AR6_WGII_SummaryForPolicymakers.pdf; **[[312.5461]]**

https://report.ipcc.ch/ar6wg3/pdf/IPCC_AR6_WGIII_SummaryForPolicymakers.pdf. **[[312.5504]]**

² <https://www.ipcc.ch/2022/04/04/ipcc-ar6-wgiii-pressrelease/>.

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