

Your submission to Zero Carbon Bill

SKYCITY Entertainment Group Limited

Reference no: 11171

Submitter Type: Business / Industry

Clause

1. What process should the Government use to set a new emissions reduction target in legislation?

Position

The Government sets a 2050 target in legislation now

Notes

Clause

2. If the Government sets a 2050 target now, which is the best target for New Zealand?

Position

Net Zero Emissions - Net zero emissions across all greenhouse gases by 2050

Notes

Clause

3. How should New Zealand meet its targets?

Position

Domestic emissions reductions (including from new forest planting) and using some emissions reductions from overseas (international carbon units) that have strong environmental safeguards

Notes

Clause

4. Should the Zero Carbon Bill allow the 2050 target to be revised if circumstances change?

Position

Yes

Notes

To allow for change if science indicates targets need to change to ensure global temperatures keep within 2 degrees of warming

Clause

5. The Government proposes that three emissions budgets of five years each (i.e. covering the next 15 years) be in place at any given time. Do you agree with this proposal?

Position

Yes

Notes

Clause

6. Should the Government be able to alter the last emissions budget (i.e. furthest into the future)?

Position

Yes - the third emissions budget should be able to be changed but only when the subsequent budget is set

Notes

Clause

7. Should the Government have the ability to review and adjust the second emissions budget within a specific range under exceptional circumstances? See p36 Our Climate Your Say

Position

No

Notes

Clause

8. Do you agree with the considerations we propose that the Government and the Climate Change Commission take into account when advising on and setting budgets? See p44 Our Climate Your Say

Position

Yes

Notes**Clause**

9. Should the Zero Carbon Bill require Governments to set out plans within a certain timeframe to achieve the emissions budgets?

Position

Yes

Notes**Clause**

10. What are the most important issues for the Government to consider in setting plans to meet budgets? For example, who do we need to work with, what else needs to be considered?

Notes

Government needs to take urgent action on setting a robust framework to be able to enforce the targets to ensure significant change is made to successfully transition the economy to one of net zero emissions by 2050. Government needs to engage with all sectors of industry and society to evoke a true understanding of the necessity to mitigate and adapt to climate change.

Clause

11. The Government has proposed that the Climate Change Commission advises on and monitors New Zealand's progress towards its goals. Do you agree with these functions? See p42 Our Climate Your Say

Position

Yes

Notes**Clause**

12. What role do you think the Climate Change Commission should have in relation to the New Zealand Emissions Trading Scheme (NZ ETS)?

Position

Advising the Government on policy settings in the NZ ETS

Notes**Clause**

14. Do you think the Zero Carbon Bill should cover adapting to climate change?

Position

Yes

Notes**Clause**

15. The Government has proposed a number of new functions to help us adapt to climate change. Do you agree with the proposed functions? See p47 Our Climate Your Say

Position

Yes

Notes**Clause**

16. Should we explore setting up a targeted adaptation reporting power that could see some organisations share information on their exposure to climate change risks?

Position

Yes

Notes

You have elected to withhold your personal details from publication.

SKYCITY Entertainment Group is an award winning entertainment provider, with operations in Auckland, Hamilton, Queenstown, Adelaide and Darwin. We recognise that corporate social responsibility is critical to all levels of our business and operations and understand that being a responsible business is to acknowledge our impacts, both to community and the environment and to mitigate and abate negative impacts.

SKYCITY recognises our environmental impacts and the necessity to act on climate change. It is for this reason and for the betterment of our environment, our people and for future generations, that we support, in principle, the Government to set in law a net zero emission target by 2050. SKYCITY is a signatory to the Sustainable Business Council's top 50 business pledge to cut carbon emissions to keep global temperatures within 2 degrees of warming and has committed to Science Based Targets.

As a major purchaser of goods and services, we spent over \$250 million across a wide array of suppliers in the financial year ending June 2017. As such SKYCITY has a significant opportunity to use its purchasing power to drive sustainability. Our approach is to focus on the areas in which we can have the biggest impact in terms of minimising carbon through working with key vendors. These areas include food, beverage, property and marketing portfolios in particular.

As part of our commitment to climate action, SKYCITY is currently working towards achieving CEMARS certification (Certified Emissions Measurement And Reduction Scheme). SKYCITY is measuring, managing and formalising a reduction plan of our carbon emissions to keep global temperatures within 2 degrees of warming. This will be independently audited and verified under the CEMARS programme run by Enviro-Mark Solutions, a government owned environmental certifications body. SKYCITY has already made steps towards climate action including a 15% and 5% reduction in carbon from gas and electricity respectively per dollar revenue from FY15-FY17.

Subject to seeing the wording of the actual Bill, we support its stated aims including the introduction of a Climate Change Commission and the development of emission budgets of five years each. We expect the Government will select Climate Change Commissioners with the necessary skills and expertise to guide New Zealand on our transition towards net zero emissions. SKYCITY would see that the Commission advises on and monitors progress towards targets. In relation to the Emissions Trading Scheme (NZ ETS) SKYCITY believes the Climate Change Commission should advise the Government on policy settings in the NZ ETS.

SKYCITY Entertainment Group believes adapting to climate change is necessary for resilience and supports the inclusion of adaptation in the Zero Carbon Bill.

SKYCITY supports a long term and stable policy environment with a clear emissions target but also a clear path to achieve this. It expects this legislation to provide the necessary framework and policy objectives to achieve this. SKYCITY would like to see the Bill outline powers of enforcement and punitive actions available to ensure uninterrupted commitment, particularly in the event of a significant global crisis.

SKYCITY agrees a planned transition to net zero emissions over time is the ideal approach and cautions against sudden or dramatic change that could impact the ability of business to cope with the transition to a net zero emissions economy. The transition to and growth of businesses in this new economy will require careful management.

SKYCITY notes a net zero target for all emissions is likely, according to the Government's own economic analysis, to impact some sectors and industries, as well as low-income households. SKYCITY expects the Government will put in place plans and policies to manage these impacts. In particular SKYCITY urges the Government to consider ways to ensure economic growth and households are not significantly impacted by the selected emissions target.

Our climate action strategy will be adopted and made public prior to the implementation of the Carbon Bill in April 2019. It is also our goal to educate our community of people on climate change and the actions they can take to reduce their emissions.

Regards

A handwritten signature in black ink, appearing to read "G. Stephens".

Graeme Stephens
Chief Executive Officer
SKYCITY Entertainment Group Ltd