Your submission to Zero Carbon Bill

Steven Cranston Consulting LTD (Steven Cranston)

Reference no: 199

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 Long-Lived Gases and Stabilised Short-Lived Gases - Long-lived gases to net zero by 2050 while also stabilising short-lived gases
Notes
Option two is the only way to treat both CO2 and CH4 the same in policy. Its the physical net change of a GHG we should be monitoring as that is what affects the climate (ie inflow minus outflow). This is how CO2 is treated so not doing the same with CH4 will unfairly disadvantage farmers and result in many farmers not buying into the scheme. It must be fair. The advances of focusing on 'net' methane are significant for both agriculture and the country as a whole. I have calculated (contact me for details) that NZ agriculture is comfortably warming neutral as of 2018, this include a small increase of 'net' methane, N20 and CO2 sequestration. Agriculture only needs 106,000 ha of actively growing trees to achieve this. The marketing opportunities from this approach would be massive as apart from Australia, few other major agricultural exporters can make this claim. This approach is also critical to stop synthetic protein companies using climate change as a reason to not buy natural products. They could be a significant competitor in future. Option two and more specifically a goal of getting atmospheric methane volume back to 1990 levels will allow agriculture to demonstrate they have not warmed the planet (from methane) since the IPCC was created. If agriculture is asked to reduce CH4 emissions below this point it will open us a major debate about fairness. For CO2 emitters to achieve the same result for the climate they would need to sequester all the CO2 they have emitted over the last 28 years (1990 atmospheric CO2 volume). Technically Carbon neutral is net zero carbon and Methane and CO2 both only have one carbon atom. The only way to reflect this is treating both gases the same, otherwise the GWP100 metric will not actually mean Carbon neutral. The Act must treat both gases the same relative to their warming effect.

Clause 3. How should New Zealand meet its targets?
Position
Domestic emissions reductions only (including from new forest planting)
Notes
If CH4 is accounted for correctly by net methane (inflow minus outflow), it will be much easier to make NZ carbon neutral. If only 106,000ha are required to offset all net agricultural emissions then there will be plenty of trees available for farmers to sell carbon credits to help offset other industries emissions. Beef and Lamb have suggested there are 2.7 million hectares on just their farmers land (only actively growing trees can be included though).

Clause 4. Should the Zero Carbon Bill allow the 2050 target to be revised if circumstances change?
Position
Yes
Notes
The Bill must always follow the latest science and economic realities.

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
No
Notes
The Government must catch up the science first. They need to recalculate what this Bill will mean for farmers, industry and the general public using the net methane approach which will directly correlate to warming affect. We have no idea what out what is required to be warming neutral yet because the government has not calculated emissions accordingly.
Clause 6. Should the Government be able to alter the last emissions budget (i.e. furthest into the future)?

**Position**
Yes - each incoming Government should have the option to review the third budget in the sequence

**Notes**
It must be able to be flexible to reflect changing research, data, and economic circumstances.

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**
Yes

**Notes**
It must be able to be flexible to reflect changing research, data, and economic circumstances.

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

**Notes**
No budgets can be set until the Government re-evaluates the metric used to measure methane. This is too important to NZ and must be done correctly relative to warming. Failure to do so will undermine the entire Bill as it does not reflect the aim of the Paris Agreement to limit 'warming'.

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**
Agriculture has much to gain from setting their CH4 target to 1990 levels. We need targets so our industries can prove what they have achieved and get the rewards from improved PR and marketing.

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**
No budgets can be set until the Government re-evaluates the metric used to measure methane. This is too important to NZ and must be done correctly relative to warming. Failure to do so will undermine the entire Bill as it does not reflect the aim of the Paris Agreement to limit 'warming'.

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**
Agriculture should also be modeled at the farm level. This is the only way to get positive change on farm. A fair scheme with product marketing and carbon credit rewards will quickly get farmer buy in I believe. Overseer is a suitable tool for this, it will require additional upgrades such as being able to map and model CO2 sequestration from bush blocks.

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 13. The Government has proposed that Climate Change Commissioners need to have a range of essential and desirable expertise. Do you agree with the proposed expertise? See p45 Our Climate Your Say

**Position**
Yes

**Notes**
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<tr>
<th>Clause</th>
<th>14. Do you think the Zero Carbon Bill should cover adapting to climate change?</th>
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<tr>
<td>Position</td>
<td>No</td>
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<tr>
<th>Clause</th>
<th>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</th>
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<td>Position</td>
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<th>Clause</th>
<th>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?</th>
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<tr>
<th>Clause</th>
<th>Do you have any other comments you'd like to make?</th>
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<td>Notes</td>
<td>Please contact me for how an individual farm GHG budget can be rolled out and operate. I have put a significant amount of time into this and its something the farmer good organisations has overlooked to a large extent. I am happy to work with Government on creating an effective, targeted approach to reducing on farm emissions.</td>
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Supporting documents from your Submission

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