Submissions form

We seek your feedback on the specific proposals in the Zero Carbon Bill.

Either email this submission to ZCB.Submissions@mfe.govt.nz (Microsoft Word document (2003 or later) or PDF) or post to Ministry for the Environment, PO Box 10362, Wellington, 6143.

Publishing and releasing submissions

All or part of any written submission (including names of submitters) may be published on the Ministry for the Environment’s website, www.mfe.govt.nz. Unless you clearly specify otherwise in your submission, the Ministry will consider that you have consented to website posting of both your submission and your name.

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Personal / organisation details

You must provide either a company name or given name(s)

Company name _______________________________________________________________________

Given names _______________________________________________________________________

Surname _____________________________________________________________________________

Contact person _______________________________________________________________________

Address ____________________________________________________________________________

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Submitter type, pick one:

- Individual
- NGO
- Business / Industry
- Local Government
- Central Government
- Iwi / Māori
- University
- Research Institute
- School
- Community Group
- Unspecified / Other

2050 target

1. What process should the Government use to set a new emissions reduction target in legislation?
   Pick one:
   - the Government sets a 2050 target in legislation now
   - the Government sets a goal to reach net zero emissions by the second half of the century, and the Climate Change Commission advises on the specific target for the Government to set later.

   No comment

2. If the Government sets a 2050 target now, which is the best target for New Zealand?
   Pick one:
   - net zero carbon dioxide: Reducing net carbon dioxide emissions to zero by 2050
   - net zero long-lived gases and stabilised short-lived gases: Long-lived gases to net zero by 2050, while also stabilising short-lived gases
   - net zero emissions: Net zero emissions across all greenhouse gases by 2050.

   No comment

3. How should New Zealand meet its targets?
   Pick one:
   - domestic emissions reductions only (including from new forest planting)
domestic emissions reductions (including from new forest planting) and using some emissions reductions from overseas (international carbon units) that have strong environmental safeguards.

Only purchase international credits if the NPV of buying them over the life of the alternative action (at the Government's cost of capital) is better. i.e. take a long term view, not just a one-off purchase view, as was the case with the Projects Mechanism. For instance, if an industrial wood boiler lasts for 30 years and therefore abates emissions for 3 x 10 year commitment periods, then the NPV of purchasing carbon credits at (say) $40/T in 2020 and (say) $100/T in 2030 and (say) $250/T in 2040 should be factored into the calculation of the incentive the Government should be willing to provide to get that project to happen in 2019.

4. Should the Zero Carbon Bill allow the 2050 target to be revised if circumstances change?
   Pick one:
   ☐ yes
   ☐ no.

Revisions upwards should be allowed if technology progresses faster than expected or is climate change is getting significantly more extreme than anticipated.

Revisions downwards should ONLY be permitted with very strict triggers and clearly defined checks/balances to ensure any revision it is not politically driven.

Emissions budgets

5. The Government proposes that three emissions budgets of five years each (ie, covering the next 15 years) be in place at any given time. Do you agree with this proposal?
   Pick one:
   ☐ yes
   ☐ no.

   No view either way.

6. Should the Government be able to alter the last emissions budget (ie, furthest into the future)?
   Pick one:
   ☐ yes, each incoming Government should have the option to review the third budget in the sequence
☐ yes, the third emissions budget should be able to be changed, but only when the subsequent budget is set
☐ no, emissions budgets should not be able to be changed.

**Only the Climate Commission should be able to change emissions budgets. It’s role is to be independent of politics. Governments are too conflicted, so should not be allowed to make any changes without the CC recommending it.**

7. Should the Government have the ability to review and adjust the second emissions budget within a specific range under **exceptional circumstances**?
Pick one:
☐ yes
☐ no.

**Only the Climate Commission should be able to change emissions budgets. It’s role is to be independent of politics. Governments are too conflicted, so should not be allowed to make any changes without the CCC recommending it.**

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?
Pick one:
☐ yes
☐ no.

**No comment.**

**Government response**

9. Should the Zero Carbon Bill require Governments to set out plans within a certain timeframe to achieve the emissions budgets?
Pick one:
☐ yes
☐ no.
Of course. The goal has to be planned to be delivered with a realistic ramp-up, rather than leaving it all until the last 5 years. It should start with the lowest hanging fruit that can deliver benefits now with proven technology – for instance utilising sawmilling and forestry residues (and purpose-grown short-rotation crops) to decarbonise the commercial and industrial heat sector. This can be done using existing waste streams and well-proven combustion technology – instead of hoping for some future technology breakthroughs to economically generate high-grade and 24x7 heat from electricity, combined with some yet-to-happen breakthroughs in battery power storage and a massive ramp-up in solar/wind/geothermal generation.

So use renewable electricity to deal with the significant challenge of electrifying the transport fleet, and leave the stored solar energy of biomass to decarbonise the heat sector 24x7, upon demand, as is needed by that sector. There is no need for lithium-ion batteries.

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?

Work with Industry associations who are experts in their relative fields. For example the Bioenergy Association has a decarbonisation plan for the heat sector and a Biogas plan for power generation that dovetails elegantly with waste minimisation, yet its advice and its voice is repeatedly ignored.

Climate Change Commission

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?

Pick one:

ッチ yes
'icon-yes' no.

Yes and No. It should indeed advise and monitor, but its role should have a stronger role that also requires actions to be ramped up if targets are being missed.

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

Pick one:

- [$] advising the Government on policy settings in the NZ ETS
- [$] makes decisions itself, in respect of the number of units available in the NZ ETS.
It should advise the ETS to be scrapped or at a minimum modified into a carbon trading system. The ETS is too slow and is not easily controllable. The Gov’n’mt should be able to set the price of carbon, and be able to easily alter it up or down to speed up or slow down the rate of de-carbonisation.

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?

Pick one:
- [ ] yes
- [ ] no.

Optional comment

Adapting to the impacts of climate change

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

Pick one:
- [ ] yes
- [ ] no.

No – that makes it too big and too complex and potentially introduces a conflict of interest: if it is deemed the horse has bolted (eg run-away climate change) some will argue zero carbon ambitions should be abandoned in order to plough all funds into adaptation.

Keep them separate.

15. The Government has proposed a number of new functions to help us adapt to climate change. Do you agree with the proposed functions?

Pick one:
- [ ] yes
- [ ] no.

No comment
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?

Pick one:

☐ yes
☐ no.

No comment