Your submission to Zero Carbon Bill
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Reference no: 9498
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
It is essential a hard and fast minimum target be set from inception otherwise there is high risk that over time the goal will be weakened. NOTE: There seem is merit in achieving net negative emissions i.e. to drawback on the inventory of gasses already in the atmosphere. Net zero by itself is unlikely to be adequate - we need to undo the harm which has already been done and the additional harm which will occur by 2050, rather than merely cause no more harm from 2050 onward. The consultation paper fails to discuss this key aspect.

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
It is essential to differentiate long-lived and short-lived gases (a two basket approach) in developing policies and strategies for implementation. In addition, distinguish between fossil methane and biological methane in policies. See response to Question 1. where net zero by 2050 is unlikely to be sufficient.

Clause
3. How should New Zealand meet its targets?

Position
Domestic emissions reductions only (including from new forest planting)

Notes
Limiting consideration solely to net zero within NZ - which presumably includes within its exclusive economic zone (EEZ) and NZ controlled airspace - overlooks the CO2e in imported goods and services. These impacts of NZ consumption are considerable and include for example NZ use of Internet file servers located in overseas data centres and content in imported manufactured goods, including adverse impacts on water and soils (e.g. cotton growing). There are also issues regarding shipping, air freight and air passenger services. The impacts of decisions made in New Zealand are far broader then NZ itself. Confining consideration to "Scope 1" emissions (per the GHG Protocol) is inadequate for government as it is for instance for private sector entities.

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

Position
No

Notes
Except they should be pro-actively encouraged to be reduced sooner - and they will likely need to be less than zero by 2050. Although zero 2050 is possibly a good first step it is not likely to be adequate to achieve the key objective of less than 1.5C global average temperature increase - some places are close to and exceeding that already.

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
Qualified "Yes". The question is how often these would be reviewed and modified, on what basis, how often and by whom. For example, based on the (emergent) science, or political processes. The later can often be irrational and strongly influenced by powerful internal and external vested interests, personal and political philosophies, as well as international trade agreements and associated processes.
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
A qualified "Yes". The period to reach the objective is 30 years. Dividing this into three tranches each of 10 years split into two 5 year periods seems more realistic than two tranches each of 15 years split into three periods. Fifteen years seems far too long and it should not be driven by the very short political election cycle which NZ has. (It is well known the short, three year, cycle has serious negative impacts on the country) Once every 5 years the forward budgets, firm for say 10 years and indicative for the remaining years could be determined. The consultation paper suggests the budgets should be set by the government. No rationale is provided for this approach; it may be more appropriate to not have this as a political process and for it to be performed and determined by an independent agency of Parliament such as the proposed (a) Zero Carbon Commission, (b) the Parliamentary Commissioner for the Environment (who is an officer of Parliament) with review/audit by the Controller and Auditor General (who is also an officer of Parliament). Or (c) perhaps by the Government Statistician who has a special statutory relationship with the government. Actuarial concepts could also be considered. The target of zero (or preferably less than zero) by, and preferably before, 2050 should be immutable.

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
On the condition the sole allowable changes are to achieve zero (or preferably less) at a more rapid pace. Under no circumstances to extend the date - ideally achieve earlier, say 2040. The objective may also include achieving net negative emissions by 2050 (or earlier) and to increase net negative in succeeding years. If the country substantially reduces its stock of ruminant animals and/or feeding them seaweed is as promising as trials suggest, then the target should be easily achievable. Also, the markets for meat and milk may likely to reduce at a very rapid pace in coming years, and that for wool increase because of micro-fibre issues pertaining to much clothing.

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
Broadly "Yes"; but. Please see responses to earlier questions. New Zealand Governments have been known to ignore advice of the PCE and society is paying the cost of that. Governments have been known to ignore advice of the Controller and Auditor General. Governments have been known to ignore advice of the Ombudsman. Governments have been known to ignore advice of the Prime Minister's Chief Science Advisor. Governments have been known to ignore recommendations of Royal Commissions and of numerous other specialist bodies. It has created. Governments frequently ignore recommendations of Coroner. Governments have not ignored (in any substantial way) decisions of the Remuneration Authority. Table 6 on page 42 and related material does not seem to explore the options with sufficient rigor. Should the "Advisory, with mechanisms built in to hold Government to account" model be selected then there should be a review/audit of government decision-making process and decisions by the Controller and Auditor General perhaps with input from actuaries. This to help dissuade decisions being tainted by political and ideological matters. The advisory (and decision-making?) role of the proposed commission should also consider impacts on the natural environment (natural capital) in addition to climate change science, technology, economics, policy and business. Ideally the 6 capitals as described by the <IR> (Integrated Reporting framework) and at least the 4 capitals being developed by Treasury's framework as well as the UN's SDG's (Sustainable Development Goals); everything is connected. "Climate change policy will have a broad impact on New Zealanders." [Page 41] There is a need for whole of government to work in concert toward the same objectives - not pockets, nor pockets which are going in different directions and have different priorities.

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
This is stated in answers to preceding questions. A key question is when the first budgets would be set and impactful actions commenced. Even if the first budget is a bit rough around the edges a budget (and actions) should be put in place no later than the government's 2019/2020 budget.

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
There is a need to work across all of society. It is part of creating the New Zealand New Zealander's want. This requires engagement
from community level up, as well as from Parliament down. Climate change issues are part of the mix of items which comprise what New Zealanders want - everything is joined up. Governments, politicians and bureaucrats have a tendency to presume they know what citizens’ wants needs and aspirations are and what is ‘best’. Although these perspectives may be correct in some instances they can be very wrong in others. There is a place for both ‘up’ and ‘down’ engagement; real community engagement and consultation. There are ‘many’ instances where current consultation and discussion practice involves little more than telling communities what has already been decided; that approach can often be farcical. The learnings outlined in the ‘New York Times’ article of 3rd July 2018 could be very useful. It discusses ‘complex adaptive coalitions’; www.nytimes.com/2018/07/03/opinion/community-revitalization-lancaster.html Budget setting process need to have a programme which avoids a ‘hockey stick’ of outcomes toward the later period of the 30 year (or lesser) time period. It would seem reasonable to make as much gain as possible in the early years (low hanging fruit) as making the final gains could be more challenging and require more time per ‘unit of achievement’; the final 10% perhaps taking 20%+ of the effort and expense.

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
A qualified ‘yes’. There is no point in monitoring if governments choose to ignore advice given. As mentioned in responses to previous questions, there are numerous instances where governments have chosen to ‘snub their noses’ at considered expert advice provided. On the whole there have been limited political ramifications to those ‘snubs’ and if there are outstings of ministers/governments they can take years. We are dealing with a matter of considerable importance and urgency. The country can not afford any longer to be ‘stuffed around’- we have been stuffed around for the last 10 years - and more - and the issue is now more complex, more expensive and of enhanced urgency. The target of net zero is not good enough - that is well known. So why is our aspiration to net zero and no more? It seems that what is others are choosing to do. But NZ Inc promotes itself as ‘boxing above its weight’, of being ‘innovative and nimble’, of ‘being a small smart clever country’. Surely we can do better than the others; why aim for ‘mediocrity’?

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
At the very least the Commission should advise the government on policy settings in the NZ ETS. My big ‘however’ is I feel ETS is totally the wrong approach to take and has an elements of ‘smoke and mirrors’; is expensive and complicated to operate and provides great income earning opportunities for people and organisations who/which add no real value.

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
Again my response is a qualified “Yes”. Expertise not explicitly referred to such as human/public health, entomologists (insects) and disease-carrying vectors generally including seaborne, design (of houses, buildings and communities, life cycle analysis, root cause analysis, data analysis, consumerism (so we purchase less and use less), food substitution (such as the rise of artificial meat and milk and insect-based foods which could have huge impacts on NZ’s carbon footprint, land use and exports).

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

Position
Yes

Notes
It is already apparent the country is experiencing a variety of climate change impacts. It is vital these emergent impacts be picked up and pro-actively managed in a robust way across the country. Mandatory processes including reporting are essential and not limited to local and central governments. Others include public health and welfare, animal health and welfare, fire, flood, erosion and water supply/sanitation risks. There is also strong prospect of climate change refugees NZ will have to deal with in relation to Pacific Island peoples. Plus there is also potential for a overwhelming large number of climate change refugees from other countries who will arrive in NZ and/or will require support elsewhere. The discussion paper seems to be silent on these major issues. Climate change in other countries could also impact NZ in regard to the availability and pricing of goods and services it seeks to purchase from other countries. This could include for example various foods, petroleum and petroleum-based products. Impacts could extent to the stability of financial and related systems (banks, insurance, exchange rates).

Clause 15. The Government has proposed a number of new functions to help us adapt to climate change. Do you agree with the proposed
A key question is to determine not only who has responsibilities but why and to what extent those responsibilities extend to funding required to ameliorate/manage the risks with a sense of fairness and equity. In some instances this may require public and private land and assets being abandoned - this is already occurring in other countries. A matter to consider is to what extent if any should EQC's responsibilities be expanded into these areas in addition to its' current responsibilities. Related to this is the services provided for property which has not been insured (and thus levied for fire and EQC). Their is lack of fairness and equity that those not insured for instance receive fire services. There may need to be changes to property rating systems for some aspects of climate change mitigation/adaptation and GHG reductions. There will almost certainly be impacts on privately owned industries and sectors which range from minor to ‘critical' to the economy and society well-being.

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
Reporting should be mandatory for those sectors/entities which are considered to be of substantial importance to the operation of well-being and the economy including export markets - all sectors including central, regional and local government and their agencies. In most instances this could be achievable through adoption of <IR> (Integrated reporting), GRI reporting (Global Reporting Initiative reporting), SDG's reporting (Sustainable Development Goals,) or even the Carbon Protocolas a starting point. It is noted some early stage moves about about this are already underway by the NZX and could be extended in scope and mandated. Other Exchanges have for some years had more stringent requirements. This reporting should include fund managers, insurers and similar.

Clause
Do you have any other comments you'd like to make?

Notes
Purchasing of carbon credits offshore although it may sound a good idea it is doing little more than delaying the actions NZ needs to take and adds to complexity as has been seen with credits already purchased. (Noted: Those decision-makers do not seem to have been held accountable). It also has a negative impact on NZ's foreign exchange position which over long periods of time has been tenuous and more so since major assets were, and continue to be sold to overseas interests. Perhaps as part of the social license to do business in NZ those entities could be required to demonstrated their (verified) carbon reduction/climate change actions - profits going offshore is a form of 'carbon leakage' and use of those profits could negate actions being taken by NZ. Their offshore actions should at the least equal or be better New Zealand's targets. There is seemingly no coverage in the discussion paper of the outcomes should the government (or Parliament?) not achieve the required targets. Similarly, if any other entity involved under-achieves. What dis-incentive(s) and accountabilities might there be? This in a context where time-frames are relatively short. How would non-performance be managed? Clearly this is a complex area. It seems there should be direct consequences for poor advice, policies and decision-making where-ever that occurs - including at the political level where for example we have recently seen appalling government policy about clean/swimable waterways and use of water for major irrigation works. NZ has considerable responsibilities (moral ethical, social, economic) toward its Pacific neighbours and New Zealand should take a strong pro-active role in helping and supporting those peoples and their countries. There is a high likelihood of there being climate refugees from those countries and from highly populated countries elsewhere. Ultimately New Zealand may have no choice but to accommodate such peoples as they are exposed to major climate change impacts in their countries. That there will be political instability in other countries is a ‘given'. Water shortage is the root cause of the uprisings in Syria and migrations from numerous countries.