Submission
To the
Ministry for the Environment
Our Climate Your Say: Consultation on the Zero Carbon Bill Discussion Document

He kākano au i ruia mai i Rangiātea.
I am a seed sown in the heavens of Rangiātea.

Summary of key points

Saving our Common Home and the Future of Life on Earth

1. The poor and vulnerable are already suffering from the adverse effects of climate change.
2. We are compelled to urge New Zealand to significantly strengthen its current policies for mitigation, adaptation and climate finance, amongst others, in order to honour the Paris Agreement.
3. As to setting the next round of commitments under the Paris Agreement, New Zealand does not have to wait for the 2020 target date to increase its ambition. In the context of sustainable development and efforts to eradicate poverty, the opportunity to strengthen our laws by contributing our fair share to limiting the global average temperature increase to 1.5°C above pre-industrial levels exists here and now.
4. Attention must be given to meaningful engagement on climate change with tangata whenua and our Pacific neighbours.
5. Caritas supports the establishment of an independent Climate Change Commission. The terms of reference for this commission must be appropriate to Aotearoa New Zealand - our geography, our peoples and our economy - and consistent with the Paris Agreement.

1 Intervention of the Cardinal Secretary of State at the International Conference “Saving our Common Home and the Future of Life on Earth” on the third anniversary of the Encyclical Letter ‘Laudato Si’, 05.07.2018.
Introduction

1. Caritas Aotearoa New Zealand is the New Zealand Catholic Bishops Conference agency for justice, peace and development.

2. Our work is shaped by Catholic Social Teaching, which reinforces the dignity of each and every person, along with their responsibilities, regardless of culture, ethnicity, gender or religion. We promote, in particular, the principles of:

   - Human dignity – Te tapu o te tangata;
   - Solidarity – Kotahitanga;
   - Subsidiarity - Mana whakahaere;
   - Preferential option for the poor and vulnerable - He whakaaro nui mō te hunga rawakore;
   - Participation - Nāu te rourou, nāku te rourou;
   - Stewardship – Kaitiakitanga; and
   - The Common Good - Hei painga mā te katoa.

3. Our environmental justice and climate change advocacy and policy work is informed by community-based research and conversation, which in the spirit of Talanoa (respectful and authentic dialogue) aims to reflect a participatory and inclusive process. We regularly document the human face of climate change on those most at risk; and we advocate for the needs of the poorest and the most vulnerable. In international fora, such as the United Nations Framework Convention on Climate Change Conference of the Parties (UNFCCC COP), we aim to influence policies, mechanisms and rules to be more responsive to sustainable development, poverty reduction and the needs of small island states and the most vulnerable communities. At home, we monitor and assess the environmental and climate change impacts of sea level rise, food and drinking water sources, sea mining, extreme weather and climate finance on the people of Oceania (New Zealand included). We publish the Caritas State of the Environment for Oceania report each October on behalf of the Caritas Oceania region.

4. Caritas Aotearoa New Zealand welcomes New Zealand’s endeavours to:
   a. Honour our commitments under the Paris Agreement;
   b. Build resilience to climate-related disasters in New Zealand and our region; and
   c. Strengthen the capacity of small and vulnerable communities throughout the Pacific to access, and reap the benefits of, public and private climate finance.

5. We underscore the importance of embracing a unified Climate Change law that upholds the spirit, vision and commitments of the Paris Agreement; creates a space for decisive action here and now; and protects and promotes our ‘common home’ in law and practice.

Structure of Submission

6. This submission responds to the four specific proposals on which public viewpoints are being sought. It also provides a supplementary section, which sets out our additional views as to how New Zealand should respond to climate change at this point in time.
Mitigation

7. The Ministry for the Environment’s discussion document sets out three mitigation options: the first option is to cut carbon dioxide by only reducing net carbon dioxide emissions to zero by 2050; the second is to set a target of net zero long-lived gases and stabilised short-lived gases; and the third is to set the target as net zero emissions across all greenhouse gases by 2050.

8. We suggest that these may not be the only options and that a rational argument should support any final decision regarding New Zealand’s mitigation target.

9. In response to which option may be appropriate for New Zealand, we urge New Zealand to honour its commitments to the Paris Agreement insofar as, “Developed country Parties should continue taking the lead by undertaking economy-wide absolute emission reduction targets rather than relying on international offsetting.” Every dollar spent on international carbon credits is a dollar that cannot be invested in transitioning New Zealand’s economy. Mitigation measures should focus on reducing relevant greenhouse gas emissions and sustained investment in offsetting measures that return benefit to New Zealand’s natural environment, people and economy.

Budgets

10. In response to the question raised in the Discussion Document about whether the government should undertake transparent and responsible reporting, the Paris Agreement gives direction in this regard, and we support such reporting.

New Climate Change Commission

11. Caritas supports the idea of exploring whether to establish an independent, enduring and accountable Climate Change Commission, but urge that care be taken as to framing a Terms of Reference appropriate to Aotearoa New Zealand and consistent with the Paris Agreement.

12. If instituted, establishing and supporting an independent Commission will hopefully be a step in the right direction, helping to co-ordinate and focus attention to this issue across public and private spheres.

13. Caution should be heeded to ensure that the Climate Change Commission has the necessary authority to effect change. Careful reflection as to interlinkages between existing institutions, such as the Parliamentary Commissioner for the Environment, is also required before creating any new institutional entity.

14. Possible roles of a Climate Change Commission include the following:
   a. Administering a unified Climate Change Act;
   b. Serving as an independent advisory body with mechanisms built in to hold Government to account;
   c. Setting up strong public and private sector governance measures and a clearly defined roadmap to deliver on them;
   d. Providing evidence-based advice;

---

e. Developing and overseeing an agreed climate change action plan to meet agreed targets by focusing on a small number of critical highly leveraged actions New Zealand could take that would make the greatest impact on New Zealand’s performance consistent with the United Nations Framework Convention on Climate Change (UNFCCC) and the Paris Agreement;

f. Being, itself, held to account through appropriate governance mechanisms;

g. Providing strategic direction to New Zealand’s reporting requirements;

h. Monitoring, evaluating and reporting on New Zealand’s climate change position;

i. Facilitating broader and regular cross-disciplinary stakeholder engagement, for example, with scientists, economists, engineers, business people, youth, women, Māori, NGOs and faith-based leaders.

j. Establishing and chairing cross-functional and interconnected sub-committees and ensuring specific solutions are delivered on clearly defined terms of reference. Potential sub-committees may include a cultural, social and economic transformation committee; priority sector specific committees for relatively emissions-intensive sectors of agriculture, stationary energy and transport; and a climate finance sub-committee within the context of a Pacific reset, etc.

Adaptation

15. Consistent with honouring the Paris Agreement, Caritas supports the inclusion of adaptation measures in a new and unified climate change law. Adaptation measures must pay particular attention to the needs and impact of climate change on the poorest and most vulnerable.

Supplement. How New Zealand should respond to Climate Change (additional elements)

Fair Contribution

16. We strongly suggest that any review of New Zealand’s climate change policy and practice should be guided by whether a new unified law facilitates the required action for New Zealand to make a fair contribution to limiting the global average temperature increase to 1.5°C above pre-industrial levels, in the context of sustainable development and efforts to eradicate poverty.

17. We recommend:

a. That limiting the global average temperature increase to 1.5°C above pre-industrial levels, in the context of sustainable development and efforts to eradicate poverty, be New Zealand’s benchmark for analysis and that New Zealand work back from there to determine its fair contribution.

b. That if New Zealand does pursue net zero greenhouse gas emissions by 2050 that it attains this target through domestic instruments.3

3 We find dialogue that centres conversations about New Zealand’s greenhouse gases solely around “Zero Carbon” confusing and limiting. For our purposes, “Greenhouse gases” means those gaseous constituents of the atmosphere, both natural and anthropogenic, that absorb and re-emit infrared radiation. These gases are not limited to Carbon or Carbon dioxide (CO2); they also include Methane (CH4); Nitrous oxide (N2O) or Nox; and fluorinated greenhouse gases (or F-gases), which, as the Discussion Document points out, are relevant given New Zealand’s greenhouse gas emission profile.
c. That any achievements by New Zealand in pursuing its “highest endeavour” made in international markets would be supplementary additions to this 1.5°C above pre-industrial level target.

d. That New Zealand increase its ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development, in a manner that does not threaten food and water production; and

e. That New Zealand make finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development.

Solidarity with Tangata Whenua and Pacific Island Communities

18. Attention must be given to meaningful engagement with Māori in developing and implementing mitigation, adaptation and cross-cutting issues; technology transfer; and capacity building.

19. Changes in land use must be implemented in consultation with mana whenua. Likewise, the interests and aspirations of vulnerable communities, including Pacific Island peoples in Aotearoa New Zealand, must be properly considered and supported.

20. We support measures that demonstrate solidarity with Pacific island nations and climate policies that align with all our collective interests in the common good.

Education

21. Education is another key component to New Zealand’s response to climate change. Through the Paris Agreement, New Zealand is obligated to cooperate with others “in taking measures, as appropriate, to enhance climate change education, training, public awareness, public participation and public access to information, recognizing the importance of these steps with respect to enhancing actions under [the Paris Agreement].” Caritas suggests that these obligations and the monitoring, evaluation and reporting on them also be reflected in a new unified climate change law.

Climate Finance

22. As our State of the Environment for Oceania reports have shown over the last 5 years, we are concerned about the impacts that the adverse effects of climate change are already having on Pacific nations, as well as here in Aotearoa New Zealand. Our research and advocacy covers the following themes, but is not limited to:

a. Assessing the difficult choices needed in the face of rising tides;

b. Addressing how to safeguard our food and drinking water sources;

c. Examining the impacts of, and actual and potential responses, to coastal erosion, seabed mining, offshore petroleum and mineral exploitation, and extreme weather; and

d. Evaluating whether climate finance is demonstrably reaching the poor and most vulnerable.

23. In addition to reaching national mitigation and adaptation targets, Caritas advocates for New Zealand to strengthen its links with the Pacific and Oceania, and support the marginalised and most vulnerable. Likewise, we suggest that a new and unified climate change law be implemented in a facilitative, non-intrusive, non-punitive manner, respectful of people living on the margins and peripheries and avoiding placing an undue burden on the poor and vulnerable.

24. As Pope Francis in his influential encyclical letter on Care for our Common Home points out, “We need a conversation which includes everyone, since the environmental challenge we are undergoing, and its human roots, concern and affect us all... All of us can cooperate as instruments of God for the care of creation, each according to his or her own culture, experience, involvements and talents”.\(^5\) The challenge therefore is to find appropriate local solutions to universal problems.