Submission on “Our Climate, Your Say – Zero Carbon Bill”

Thank you for the opportunity to submit on the discussion document entitled “Our Climate Your Say: Consultation on the Zero Carbon Bill”.

The Health and Disability Services Act 2000 (section 22) provides District Health Boards (DHBs) with an objective “to improve, promote, and protect the health of people and communities”. In order to achieve this and other objectives, section 23 of the Act sets out DHB functions that includes: 23(h) to promote the reduction of adverse social and environmental effects on the health of people and communities. Accordingly the Hawke’s Bay District Health Board (HBDHB) has an interest in the proposals for shaping the way that climate change is addressed in New Zealand / Aotearoa as climate change, as well as the mitigation and adaptation processes, impact on the health of our people and communities.

Our submission is focused on those aspects of the proposals that are most likely to impact on human health.

Yours sincerely

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CHIEF EXECUTIVE OFFICER
Introduction

Climate is a determinant of health. The negative effects of climate change on health are profound and have been well documented internationally. In 2009 the Lancet Commission stated “Climate change is the biggest global health threat of the 21st century” but later, in 2015, recognised that “climate change could be the greatest global health opportunity of the 21st century.” We support and commend the government for its leadership and commitment to address climate change and support a Zero Carbon Act that is evidence-based and works in the interest of health.

Such a threat and an opportunity requires a commensurate response, which factors in the health co-benefits. When climate change is framed in terms of a health issue the “human face” is restored to what might otherwise be considered a distant threat, or one of a more technical nature. This framing may be helpful at a time where there is still a significant gap in public knowledge and understanding of climate change and its impacts and potential solutions.

We note the discussion document’s emphasis on the concept of a ‘just’ or ‘equitable transition’. We strongly support the principle that communities who are already most disadvantaged must not be left further behind, as we transition to a low carbon economy. In Hawke’s Bay, we already experience significant population health inequities that are clearly linked to socioeconomic determinants. Climate change has the potential to exacerbate these inequities if not adequately considered.

We also agree with the principle that decisions on climate change action need to give effect to the Treaty of Waitangi. Research shows that Māori are likely to be disproportionately and negatively impacted by climate change. On the other hand, tāngata whenua have a significant stake in what happens and have much wisdom to bring to the table.

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Response to Discussion Document Questions

Q1. What process should the Government use to set a new emissions reduction target in legislation?
The establishment of a new emissions reduction target requires analysis of a complex range of inputs and outcomes. Broader issues, such as the impacts of land use change on water quantity and quality, and on food security will need to be considered along with the impacts of the target choice on the distribution of economic costs and benefits. For this reason we support the two stage target setting process proposed by the Parliamentary Commissioner for the Environment. If the legislation adopts this process it will be important that either a default target or high level goal is established in legislation now.

Q2. If the Government sets a 2050 target now, which is the best target for New Zealand?
If the Government sets a 2050 target now we would be concerned about setting a carbon only target. Either a zero net emissions target or a net zero long-lived gases and stabilised short-lived gases target would have the best chance of avoiding the most serious of health impacts expected. We are also concerned that more immediate targets may be needed to avert catastrophic temperature rise. We recommend that should government set a 2050 target now the Commission should be empowered to change the date for the emission reduction target or to set intermediate targets that maintain momentum to achievement of a 2050 target.

In setting targets it will be essential that the Climate Commission makes decisions based on:
- the most up to date scientific understanding of what will get us to a stable climate as quickly as possible. Sea level rises and ocean acidification need to also be taken into consideration.
- the value of fairness both in respect of New Zealand’s relatively high per capita emission rate and in terms of impacts of the target on our most disadvantaged people.
- consistency with our international commitments under the Paris agreement. There are increasing concerns that these commitments collectively will not actually be enough to prevent harmful global warming. Since signing the Paris agreement in 2015, the second draft of the IPCC Special Report on Global Warming of 1.5°C finds substantial differences in the harmful effects of global warming limited to 1.5°C compared to 2°C above pre-industrial levels - where the 0.5°C warming difference is critical for vulnerable regions.

The Climate Commission should thus consider basing New Zealand’s emissions reduction targets on achieving global temperature stabilisation at a lower temperature, of no more than 1.5 degrees warming.

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9 Intergovernmental Panel on Climate Change. Special Report on Global Warming of 1.5°C (SR15), draft 2. 

In addition to global warming, other impacts such as sea level rises due to the thermal expansion of oceans needs to be considered under a range of target scenarios. The Hawke’s Bay region, like many other parts of New Zealand, consists of many low lying coastal communities who are already experiencing the consequences of sea level rises and storm surges. Significant work led by Councils is occurring to protect these communities and prepare for the inevitability of coastal retreat.\textsuperscript{11,12}

Impacts on our Pacific neighbours will likely be serious with possible loss of homes, land, livelihoods and potential loss of culture and identity. There is a growing Pacific community in Hawke’s Bay, already with high health needs, and as the main health provider we will need to be prepared to welcome further increases in Pacific climate migrants and be able to meet their needs.

We encourage the Climate Commission to be ambitious in the target it sets.

Q3. How should New Zealand meet its targets?
We have a strong preference for using domestic emissions reductions (including from new forest planting) as this means investment in our own country. In our region of Hawke’s Bay, the potential co-benefits to health for providing increased employment from forestry and associated industries are likely to be significant. Sawmilling, forest harvest, pulp manufacture and the transport and export of log products provide for thousands of jobs in Hawke's Bay. Forestry also offers significant environmental benefits through erosion control\textsuperscript{13}.

Q4. Should the Zero Carbon Bill allow the 2050 target to be revised if circumstances change?
If the Commission agreed on the need for a more ambitious target (e.g. to bring forward the target earlier than 2050) revision of the target should be possible. It is however hard to envisage any circumstances that would justify a less ambitious target and we would recommend such a revision should not be possible.

Q5. 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?
The Hawke’s bay District Health Board, like any other business, values certainty and capability to plan well ahead of any changes. We support the need for immediate action, as we can no longer afford to delay urgent action. To achieve this a shorter term initial budget (possibly 2 years) could be established with subsequent budgets then being set for the next fifteen year period (three emissions budgets of five years each).

The initial 2-year budget could be set within the first 5-year Emissions Budget.

Q6 - Q7. Should the Government be able to alter emissions budgets?
Given our response provided under Q5, and the Hawke’s Bay DHB valuing certainty, we do not consider that changing budgets is advisable, unless there are exceptional circumstances. For example, if there are major changes in scientific understanding or international agreements, the Government can then change the Zero Carbon Act, through the usual

\textsuperscript{11} Julia Becker, Priya Patel, Emma Ryan, Paul Schneider, Paula Blackett. Engaging with the community on coastal issues: Hawke’s Bay coastal survey 2017. A summary of the survey and results Hawke’s Bay regional Council Commissioned report.
\textsuperscript{13} https://www hbrc.govt.nz/services/land-management/forestry/
Parliamentary process. However “economic changes” should not be seen as a sufficient reason for revising budgets.

Q8. Do you agree with the proposed considerations that the Government and the Climate Commission will need to take into account when advising on and setting budgets?
As noted in the response to question 2 the following factors are key considerations when setting budgets
- being evidence-based and using the most up to date scientific knowledge
- ensuring a socially just or equitable transition to a low carbon economy
- applying Treaty principles and obligations
- global leadership and international equity

In addition, the Commission should view economic impacts as a sub-set of a broader vision for collective wellbeing that is cognisant of intergenerational equity, and integrate with new ‘economic’ models that values human, social and environmental capital, such as the proposed Living Standards Framework.

Q9. Should the Zero Carbon Bill require Governments to set out plans within a certain timeframe to achieve the emissions budgets?
Yes, there is an urgency for the development of a Government plan to reduce our greenhouse gas emissions.

Q10. 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?
(Also see responses to question 8 and 9 above.)
The Government needs to encourage wide sector ownership of the problem and solutions, including the health sector. The health sector is already leading the way with many District Health Boards, including our own, undertaking carbon credentialing. The Hawke’s Bay DHB is also making significant efforts to reduce energy use and commit to a travel plan which encourages the uptake of more active and public transport for staff and patients. However these efforts need support and encouragement from Government.

Every sector can play its part and no area should be exempt.

Public education on climate change is a key gap that needs addressing quickly if there is the expectation to implement widespread societal change. The Ministry of Education can play a key role in ensuring that climate change is on the school curriculum. However it is also critical that education programmes target all ages as it is adults who need to ensure that changes are made now for the younger generation to have a hopeful future.

Q11. 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?
Yes, we agree that the role of the Commission should be to advise how New Zealand can achieve its emissions target, stay within set budgets, provide advice on how New Zealand can best adapt to climate change, and monitor progress on New Zealand’s emissions reductions.

We support the compromise option of the Commission being an independent and non-partisan advisory body but with sufficient powers to hold governments to account, so that no government can avoid its responsibilities.

Q12. What role do you think the Climate Change Commission should have in relation to the New Zealand Emissions Trading Scheme (NZ ETS)?
The Commission should advise the Government on the Emissions Trading Scheme (ETS) policy settings so that New Zealand emits within budget. The Commission should have an open mind as to whether ETS is the right instrument for us to achieve our targets and should be careful to monitor its impacts, including fairness or equity.

Q13. 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? Yes – it is essential that there is a broad range of skills on the Commission including those listed in the discussion document.

We agree that the Commission needs to be founded on partnership with tāngata whenua and uphold New Zealand crown obligations under Te Tiriti o Waitangi.

We recommend the Commission membership includes health expertise including epidemiological and population health risk assessment along with understanding of the co-benefits for health. The background document provided by the Commission\textsuperscript{15} provides good evidence for a number of proven initiatives that tick the boxes for carbon reduction and health benefits. Indeed, this Ministry for the Environment analysis finds that “The largest source of co-benefits appears to be in the health sector, with key factors including the reduced spread of non-communicable diseases, fewer accidents and improved air quality.”\textsuperscript{16} We consider it desirable to have people with research and policy expertise in these areas, where there is solid evidence of health co-benefits in climate change mitigation. Health experts could form part of a reference pool that the Commission draws upon, as deemed appropriate.

As mentioned above, it is essential to have health and social equity impact assessment understanding as an essential component of the Commission’s work. Significantly in New Zealand, we have the expertise and methods to assess these distributional effects. The Climate Change Commission would best employ such tools as an integral part of its work, and encourage Government to work with wider sectors to do likewise.

Science communication, behavioural change and community engagement expertise is also crucial to motivate and explain to New Zealanders why we all need to make the necessary changes in their everyday lives to transition to a low carbon economy. This expertise will be required at an early stage in the Commission’s development.

Given that there are current pieces of legislation which may need to be reviewed in light of a new Zero Carbon Act, legal skills will be necessary. In particular, the Resource Management Act should be reviewed to permit consideration of the impacts of any given consent on climate change.

In conclusion, we assert the desirability for population health expertise in addition to wide sector and Māori expertise. There is also considerable merit in including Pasifika representation, considering our close ties with the Pacific, and to ensure we are outwardly focussed in meeting our international obligations.

\textsuperscript{15} Ministry for the Environment (June 2018) The co-benefits of emissions reduction: An analysis

\textsuperscript{16} http://www.mfe.govt.nz/sites/default/files/media/Climate%20Change/Co-benefits-of-emissions-reduction-FINAL.pdf p.4 accessed 5.07.18
Q14. Do you think the Zero Carbon Bill should cover adapting to climate change?
We would support a separate plan to address adaptation. Potentially, as in the United Kingdom, a separate sub-committee could be formed within the Commission that would address adaptation.

There are some regional issues which require planning now. Districts such as Hawke’s Bay already experience periods of prolonged low rainfall as well as heavy rainfall and flooding events causing social disruption\(^{17}\). These events can cause problems for our health services (e.g. power outages, damaged infrastructure, and staffing shortages) and could impact our capacity to meet demand that may be directly or indirectly related to climate change.

With the predicted increased frequency of extreme weather events, the DHB is likely to face increased service demand due to injuries, mental illness and psychological distress, exacerbation of existing illnesses, and potential for increased food and water-borne gastrointestinal infections. Even greater health impacts are likely to occur as a result of effects on the wider determinants of health. As Hawke’s Bay is a largely agrarian economy, any change in our natural systems such as unwanted pests or loss of biodiversity, could have dire impacts on livelihoods from growing food. We need to be able to forecast and plan for plausible future scenarios with respect to their wider social and health impacts.

Further national research is required to forecast changes in patterns of ill-health as a result of locked-in climate change to inform health sector planning and adaptation.

It is important that adaptation does not take priority over mitigation, which needs to be the main focus of the Commission. There is a tight window for reducing our carbon emissions and this should be the Climate Commission’s top priority.

Q15. The Government has proposed a number of new functions to help us adapt to climate change. Do you agree with the proposed functions?
Yes, we agree with the proposed functions below but consider it important that regions have input as they will be differentially impacted:
- a national climate change risk assessment
- a national climate adaptation plan
- regular review of progress towards implementing the national adaptation plan
- an adaptation reporting plan

Q16. Should the Government explore setting up a targeted adaptation reporting power that could see some organisations share information on their exposure to climate change risks?
Yes, this level of transparency from within public services would enable the Commission and Government to get a better picture of our risks and opportunities as a nation, and be well placed to provide appropriate advice and support.