Your submission to Zero Carbon Bill

New Zealand Conservation Authority

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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 important that we have a target as soon as possible so we can focus our actions and decisions accordingly. By seeking earlier reduction in emissions it gives New Zealand a longer time to adapt to the new regime. If we are early adapters we also can be market leaders in both our export products and our technological innovations.

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
The most ambitious target should be aimed for, but New Zealand then needs to be open to change in industry sectors and the economy. The ‘net zero emissions’ option includes methane emissions from livestock, which comprise about 50% of NZ emissions. Achieving ‘net zero emissions’ will require significant changes and costs in a range of sectors, including agriculture, but it is vital that this occurs. We have been world-class agricultural innovators in the past and this innovation tradition will be vitally important in the future to meet our net zero emissions target.

Clause
3. How should New Zealand meet its targets?

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

Notes
We are a small country and our emissions only make up a tiny fraction of world emissions. However the world looks to New Zealander’s ‘can-do’ attitude as a place to inspire leadership particularly in environmental protection. There are far too many examples of discredited international carbon sink and storage schemes. New Zealand should not rely on overseas ‘offsets’ in other parts of the world to meet its targets. It is important that our emissions reductions happen here. Our actions to meet our net zero emissions targets will be made up of a combination of every sector contributing in different ways.

Renewable Electricity Generation: This will underpin our whole economy and will require a major increase in water, wind and solar generation capacity beyond the present level. It will power industrial production, domestic dwellings and transport systems.

Agriculture: New Zealand will need to focus far more on methane emissions reduction, focus on increasing soil carbon levels through greater within-farm production, less reliance on stock food imports (e.g. PKE), less close-grazed pastures and more fallow periods to allow soil organic matter levels to increase. Agro-forestry operations will need to be encouraged not just as a source of timber but also as permanent carbon sinks of long lived indigenous species that can also benefit landscape diversity and native plants and animal conservation. Agricultural expansion through native forest, shrubland, tussockland and peatland development should immediately cease. These native vegetation and soil conservation areas are important and long-lived carbon sinks. The indigenous forest clearance exemption for agriculture provided for in the Forests Act should be immediately removed. Presently this exemption allows for native forest to be logged and even clearfelled to expand farmland however the timber cannot be sold as native forest logs. It can only be cleared, burnt or sold as firewood.

Forestry: There will need to be radical changes to New Zealand forestry operations, with the goal being to plant more trees including long-lived species including indigenous forests. Under a revised Code of NZ Forestry Practices, these established forests will be multiple purpose forests. One key goal of these forest will be as major carbon sinks. Carbon is locked up in timber that can then be used for construction. It is also sequestered in forest litter and micro-organisms, in soil organic matter and as “slash” across the forest floor. Many forestry operations today defeat the purpose of the carbon sink role of forests because their harvest operations are very energy intensive and cause great disturbance to soil organic matter, triggering CO2 emissions through erosion and leaf litter and micro-organism decomposition especially when exposed to bright sunlight. Post-harvest burning and post-harvest desiccant herbicides can also hasten carbon release. A shelter-wood system that also retains large areas of trees on riparian margins is likely to be more effective at safeguarding stored carbon, protecting waterways and reducing the impacts of forest harvesting on the surrounding human communities following flood events.

Fishing: There will need to be considerable changes to the strategies of the NZ fishing industry. Large vessels ranging further out and deeper in search of diminishing fish stocks may have to be replaced by smaller more community-based vessels that will, in part, use renewable energy including wind and solar power. There will be more incentives to fish locally rather than nation-wide as happens presently in the West Coast Hoki fishery where vessels come from throughout NZ and even overseas for the West Coast Hoki season.

Tourism: Local tourism should be
encouraged ahead of international tourism. Where international tourism operates, the focus should be more about destination tourism and gaining an in-depth appreciation of fewer places rather than a rush to see everything over large distances in a short time, demanding a high usage of transport fuels. The NZCA is very conscious that our National Parks with their major use of jetboats, helicopters and large coaches as well as destinations for long distance day trips have almost become temples to maximum fossil fuel use rather than sanctuaries of undisturbed nature. - Conservation Lands: These areas, many of which fall under the oversight of the NZCA, are of ever-increasing importance under zero carbon legislation. NZCA is concerned that every effort should be made to accurately document the carbon storage role of NZ’s protected natural lands. While there has been considerable work by SCION and its predecessors to document the carbon storage capability of exotic forests, NZCA is not convinced that sufficient scientific work has been done to quantify the carbon storage role of indigenous vegetation and ways in which that can be enhanced. The NZCA recognises that: • Unmodified and modified indigenous forest and shrublands have enormous regenerative capabilities. Most hill country farmers will be well aware that in the absence of grazing domestic animals many of their farms revert to native shrublands and eventually forest. In some areas this ability is being realised by owners to encourage areas to revert to economically lucrative manuka stands, suitable for honey harvest. • Natural regeneration of forest and shrublands is already occurring at a rapid rate throughout Public Conservation Lands where there is control of grazing stock both domestic (sheep, cattle) and feral (goats, deer, thar, possums). It is vital that the carbon storage within these regenerating ecosystems is recognised and measured so that New Zealand receives appropriate credit for the large proportion of our country that is already protected. • The NZCA views with concern plans to establish indigenous or exotic forests as carbon sinks if this involves any clearance of already established and regenerating indigenous vegetation. Forestry Encouragement Grants (FEG) and Land Development Encouragement Loans (LDEL) of the early 1980s and earlier in many cases resulted in the loss of large areas of forest and undoubtedly in the reduction of nett carbon storage even though this was never measured at that time.

Clause
4. Should the Zero Carbon Bill allow the 2050 target to be revised if circumstances change?
Position
No
Notes
It is important that this target remains consistent over time and is not subject to political pressure and changes of government. If the circumstances for a revision could be defined more specifically to include changes only in the context of major scientific discoveries or learnings from international strategies, then perhaps it could be considered.

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
It is important to have a long-term view of short-term steps to inform day to day decision making.

Clause
6. Should the Government be able to alter the last emissions budget (i.e. furthest into the future)?
Position
No - emissions budgets should not be able to be changed
Notes
By allowing changes when Governments change, the budget would be opened up for adverse risk and manipulation in terms of long-term certainty. If this option can be defined more specifically to include changes only in the context of major scientific discoveries or learnings from international strategies then perhaps revision could be considered.

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
No
Notes
As above in question 6.

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
Under 'energy policy', there should be particular reference to changing to infrastructure which generates lower emissions than present options. For example, tourism infrastructure relating to the conservation estate should be changed to one generating much lower emissions. New Zealand should ultimately have a ‘no carbon’ tourism and recreation infrastructure, compared with the currently high levels of fossil fuel consumption in many tourism operations. This could include (for example) the use of gondolas versus aircraft flights within protected areas.
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 should happen, to ensure accountability.

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 are many important issues for the Government to consider. In particular, the New Zealand Conservation Authority would like to emphasise the importance of encouraging native regeneration and the planting of native vegetation and changing to infrastructure which generates lower emissions than present options. The government needs to work with all sectors of the economy, including agriculture, forestry and tourism.

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  We agree that the Government should be required to respond publicly to the advice provided and monitoring reports, with time frames to provide additional accountability.

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  The decisions should be made by Government but, as above, this Commission ideally would hold Government accountable for good decision-making via their advisory and monitoring functions.

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  The proposed expertise should include a significant science/research component, including experts from the Royal Society of New Zealand who produced the recent (2016) independent report on ‘Climate Change Mitigation Options for New Zealand’.

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

Position  Yes

Notes  Yes, but climate change impacts will continue to be brought to light so this needs to remain adaptable. This could also be addressed via the Climate Change Commission.

Clause 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

Position  Yes

Notes  We generally support the proposed functions of the national adaptation plan, but discussing infrastructure of this should be a later step. However, it is important that there is a proactive plan with priority actions. The plan should have a strong scientific basis and should encourage and support coordination and collaboration between government (central, regional and local) and key sectors of society.
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
We support the idea of an ‘adaptation supporting power’. This should apply to Crown entities, local and central government, the agricultural sector and entities/companies that provide energy and transport services. Mandatory reporting will deliver vital information and provide up-to-date understanding of the adaptation actions being taken. It is always a good idea to collaborate, and discussing progress and risks would allow for more informed decision-making nationwide.

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