Zero Carbon Bill Consultation
Submission to the Ministry for the Environment
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Contact
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About the New Zealand Nurses Organisation Tōpūtanga Tapuhi Kaitiaki o Aotearoa (NZNO)

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand. NZNO represents over 52,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment related matters. NZNO is affiliated to the International Council of Nurses and the New Zealand Council of Trade Unions.

NZNO promotes and advocates for professional excellence in nursing by providing leadership, research and education to inspire and progress the profession of nursing. NZNO represents members on employment and industrial matters and negotiates collective employment agreements.

NZNO embraces te Tiriti o Waitangi and contributes to the improvement of the health status and outcomes of all peoples of Aotearoa New Zealand through influencing health, employment and social policy development enabling quality nursing care provision. NZNO’s vision is Freed to care, Proud to nurse.

EXECUTIVE SUMMARY

1. The New Zealand Nurses Organisation Tōpūtanga Tapuhi Kaitiaki o Aotearoa (NZNO) warmly supports the government's urgency and leadership on climate change and welcomes the opportunity to comment on the Zero Carbon Bill Consultation paper and.

2. NZNO has consulted its members and staff in the preparation of this submission, including Colleges and Sections, regional councils, Board, Te Rūnanga o Aotearoa and professional nursing, policy, legal, and research advisers.

3. This submission has been informed by NZNO’s sustainability network of nurses, managers (including procurement) and DHB sustainability officers, engagement with health sector colleagues, particularly by Ora Taiao, the New Zealand Climate and Health Council, which many members belong to and which NZNO supports.

4. NZNO recognises that climate change is the greatest global risk to planetary and human health and wellbeing. We also see it providing potentially the best opportunity to address inequity meaningfully, because of the co-benefits for health with well-designed climate action.

5. Accordingly, and In line with our health sector colleagues, including the New Zealand Medical Association and Ora Taiao, NZNO supports the development of legislation which provides for a net zero emissions target across all greenhouse gases by 2040.
6. We recommend that the legislation:

- **prioritises** domestic emissions reductions only, including from all plants and soil (and by implication new forest planting);
- **allows** the Government to increase (but not lower) ambition if circumstances change;
- **requires** three emissions budgets of five years each to be in place at any given time
- **allows** the last emissions budget to be altered only when the subsequent budget is set;
- **provides** for the ability to review and reduce (only) the second emissions budget in exceptional circumstances, e.g., emerging international climate evidence;
- **requires** government to set out plans within a twelve month timeframe to achieve the emissions budgets;
- **requires** the Climate Change Commission ("the Commission") to set and monitor progress and advise government on emissions goals and the best way of achieving them;
- **requires** the Commission to advise government on Emissions Trading Scheme (ETS) policy settings
- **identifies** a range of essential experience, expertise and competencies (including climate science, equity, health, mātauranga Māori, local government) for Commission, including staff and commissioners, and the ability to call in expertise as required;
- **includes** adaptation to climate change in the Commission’s role, as proposed; and
- **establishes** a targeted adaptation reporting power that could see some organisations share information on their exposure to climate change risks.

7. NZNO does not agree with the proposed considerations for setting budget emissions and proposes alternatives as discussed below and in the responses to the consultation questions.

8. NZNO recommends that you consider developing climate change legislation that is:

- be firm, fast, fair and founded on the principles of te Tiriti o Waitangi;
- ambitious, because Aotearoa New Zealand needs to be a responsible global citizen and the timeframe for intervention to keep global emissions below 2°C is short; and
- is strongly focused on the health co-benefits of healthy climate mitigation and equity "within and between countries" as per the United Nations Sustainable Development Agenda.
DISCUSSION

9. The World Health Organization (WHO) has long identified climate change as one of the greatest challenges to human health, and the Royal Society of New Zealand has recently put that into context for Aotearoa New Zealand (Royal Society of New Zealand Te Apārangi, 2017).

10. The failure to act fairly, decisively, or effectively to reduce carbon emissions before now indicates the need to set ambitious targets and embrace stringent measures to ensure meeting them as soon as possible.

11. There is strong consensus within the health sector for this because, as the discussion document and commissioned modelling confirms.:
   - the most vulnerable are likely to be most affected by climate change (Bennett et al., 2014); and
   - the health co-benefits from well-designed climate change action offers the opportunity not only to stem the rising tide of ‘lifestyle’ diseases (Swinburn, 2008), but also to address entrenched disparities in population health within and between countries\(^1\).

12. NZNO strongly supports incorporating Te Ao Māori and Kaitiakitanga in the outlined approach to climate change, and warmly welcomes recognition of the need to support lower income households to avoid disproportionate impacts which may exacerbate inequity.

13. We note that the document makes no mention of Aotearoa’s Pacific neighbours who are particularly vulnerable to the impact of climate change, or our international obligations under the United Nations Sustainable Development Agenda which aims to reduce inequity within and between countries.

14. In view of our relative wealth, location and relationship with Pacific Island nations (including trade, aid and immigration, the balance of which is not always clear or equitable) we recommend that provision should be made to consider the impact of actions on, and support transition in the Pacific Region in particular.

15. As a middle to high income nation, Aotearoa should take responsibility for not only for reducing its own emissions but also ensuring that poorer countries are not left to carry the undue burden of them.

\(^1\) See, for instance, numerous WHO publications [http://www.who.int/globalchange/publications/en/](http://www.who.int/globalchange/publications/en/)
16. Per capita, Pacific Islands emit very little already, while historically New Zealand has emitted large amounts. Pacific Islands’ $2700 per capita GDP is equivalent to that of Nigeria (and less than India’s) and is 1/9th of New Zealand’s.

17. The following figure shows that if Aotearoa does not reduce its 2030 emissions beyond its 11%-on-1990 intended nationally determined contribution (INDC), the Pacific Islands would need to be carbon neutral by 2022. (Fig. 1)


18. It is unconscionable that taking a more comfortable pathway to zero emissions will impose a more demanding pathway on our poorer Pacific neighbours, whose contribution to global warming has been negligible.

2 https://www.nzcphm.org.nz/media/116403/cc_fair_shares_for_wise__-__powerpoint_presentation__.pdf
19. We also note that the United Nations

**CONSULTATION QUESTIONS**

**2050 Target**

1. **What process should the Government use to set a new emissions reduction target in legislation?**

   The government should provide clarity and leadership by setting a more ambitious goal of **Zero Emissions by 2040**. There is simply too much at stake to rely on a timeframe that gives only a two-thirds chance of limiting global warming to 2°C. Furthermore, the countries that are being hit first and worst by climate changes, including our Pacific neighbours, are calling for 1.5°C which certainly means Aotearoa getting to net zero by 2040. Legislation should allow more ambitious targets to be set in response to innovation/new technologies, but not preclude alteration of the zero emissions target or extension of the timeframe to be relaxed.

   The legislative process should be founded on te Tiriti o Waitangi articles and include provision for “partnership, partnership, and protection”. NZNO strongly supports an approach that incorporates Te Ao Māori and the concept of kaitiakitanga. There must also be a clear commitment to equity ie delivering equitable outcomes both within Aotearoa and in the context of our role in the Pacific Region.

   Legislation should clearly be informed by evidence, having particular regard for the IPCC’s Special Report on Global Warming of 1.5°C (due this October 2018) and provide for a process that is robustly informed by scientific evidence and consensus.

2. **If the Government sets a 2050 target now, which is the best target for New Zealand?**

   **Net zero emissions across all greenhouse gases by 2040**, or earlier if the IPCC’s October 2018 report provides guidance that global emissions need to be reduced faster.

   While knowledge is accumulating and uncertainties reducing, human understanding of the biophysical thresholds for habitability on Earth is still limited. Given that already overstepped three of the nine planetary boundaries marking a ‘safe operating space for humanity’ (Rockstrom, 2009), it is prudent to err on the side of caution and aspire to leave no footprint rather than hope that what we don’t yet know won’t be important.

3. **How should New Zealand meet its targets?**

   Targets should be measured by domestic emissions reductions only, which should encompass emissions from **all plants and soil** not just new forest planting. It is quite clear that a comprehensive rather than a siloed approach to
sustainability is necessary and the right thing to do. Our earlier attempt at an international scheme predictably failed to reduce emissions and there is still no universally accepted international emissions scheme operating at present. To provide certainty, the legislation needs to be workable and focused on what the government can control – ie domestic emissions.

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

Yes, if innovation presents opportunities to reach the target earlier or to have a more ambitious target eg – 10% carbon by 2040. The target should NOT be able to be reduced.

**Emissions budgets**

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?

Yes. We think the timeframes are appropriate – 15 years plus the overall target provides a fair degree of certainty, and there are advantages in it not being aligned with electoral cycle.

6. Should the Government be able to alter the last emissions budget (i.e. furthest into the future)?

Yes. Each incoming Government should have the option to review the third budget in the sequence in order to lower but not to increase the budgets.

7. Should the Government have the ability to review and adjust the second emissions budget within a specific range under exceptional circumstances?

Yes, in order to lower, but not increase the budget.

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

No

Despite the exposition of the need for a commitment to

- a just, fair and inclusive transition, (multiple references),
- an approach that incorporates Te Ao Māori and kaitiakitanga (p11), and modelling that suggests that households that are in the lowest 20 per cent bracket for income may be more than twice as affected as those with an average income (p31);
- the significant co-benefits for health benefits of reducing emissions; and
- the likely inequitable impact of actions on some sectors (p31)
the proposed considerations are focused almost exclusively on climate change science, technology and economics, and do not encompass social science expertise, including health/equity, or matauranga Māori including honoring articles in both Māori and English versions of te Tiriti of Waitangi that refers to land, resources and taonga.

Giving some consideration to “social circumstances with a focus on circumstances and fuel poverty” does not reflect a commitment to Māori equity, or a fair and just transition for those likely to be most affected by actions which are necessary to protect us all. It does, however, reflect the status quo - ie that when it comes to the ‘sharp end’, the complex challenges of ensuring genuine engagement, partnership and equitable outcomes are superseded by what is immediately ‘measurable’, usually by people not dealing with the frontline issues of poverty, poor health, disaster, etc. Equity, te Tiriti principles, and commitment to a fair and just transition to a zero carbon economy need to be enshrined in the legislation, and the commissions processes from the outset.

As a global citizen Aotearoa needs to play its part in protecting the climate with:

- budgets based on (i) latest climate science, (ii) global fairness and leadership as a well-resourced nation, plus (iii) te Tiriti partnership that encompasses te Ao Māori, matauranga Māori and kaitiakitanga; and
- policy advice firmly grounded in equity, te Tiriti partnership, and health co-benefits as to the best policies for a just Tiriti-based transition which grows decent jobs and improves equity and health.

**Government response**

9. *Should the Zero Carbon Bill require Governments to set out plans within a certain timeframe to achieve the emissions budgets?*

Yes. The government should be required to respond to the Climate change Commission’s reports and recommendations within a year.

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?*

As above: Te Tiriti o Waitangi, equity, just transition.

For nurses, and the health sector generally, the imperative to act on climate change offers a very rare opportunity to address some of the underlying determinants of health that could substantially reduce health demand, cost and disparities. The impact and cost of cold, damp housing on health, disproportionately affecting impact on low income and vulnerable people, for example, is well known, but action to address it has been glacial. Climate change adds a valuable and immediate incentive to act now, and to act ‘smartly’ eg by embracing new technologies, realising economies of scale on nationwide amendments, and leveraging existing capability and resources eg tying subsidies to wool insulation.
Equally there is the very real risk that some actions could exacerbate entrenched health and/or socio economic inequalities, or create new ones. It is essential that health equity and wellbeing is considered in planning, implementation and monitoring. All regressive policies, including ETS settings, must be effectively offset for vulnerable communities. We recommend to your attention the New Zealand Council of Trade Unions paper on just transition (The New Zealand Council of Trade Unions, 2017).

**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? See p42 Our Climate Your Say*

Yes but it must also set the Emissions Budgets, otherwise there is little point in having an independent commission.

12. *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 ETS policy settings so that New Zealand emits within budget. The Commission must also identify the extent of regressive impacts from proposed ETS settings, and propose effective complementary policies which fairly compensate vulnerable households.

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*

The Commission should be a bicultural organisation and have a range of skills and expertise including in health and social sciences and Matauranga Māori and cultural competency. We suggest the Commission should be able to co-opt other expertise as required. Eg local government knowledge could be very useful, and the ability to manage relationships and communicate with government agencies and the public.

**Adapting to the impacts of climate change**

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

Yes but this must be ancillary to the Commission’s priority role of advising on the fairest, fastest and surest way of reducing emissions to zero by 2050.

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*
Yes – we agree with the following adaptation provisions (which include the health sector):

- 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

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?**

Yes that seems sensible.

**Marilyn Head**

**Senior Policy Analyst**

**REFERENCES**


