Q1 – What process should the Government use to set a new emissions reduction target in legislation?
• We have very little time for the country to transition to a new paradigm; it is important that a target is set in the Act for a net zero greenhouse gas emissions by 2040.

Q2 – If the Government sets a 2050 target now, which is the best target for New Zealand?
• net zero emissions: Net zero emissions across all greenhouse gases by 2050
  • A net zero emissions must include all greenhouse gases as they all contribute to global warming ... the focus must be on keeping below 1.5 degrees of temperature rise
  • short lived gases have a disproportionate effect on climatic processes, and consequent long term outcome.
  • The document acknowledges 57% of New Zealand’s greenhouse gas emissions are other than CO₂.
  • Methane has a warming effect that is 84 times more potent than CO₂ in the first two decades of release, it then converts and remains in the atmosphere as CO₂ adding to the total CO₂ emitted.
  • It is misleading to use the 100 yr. standard for accounting methane emissions as this does not reflect its actual short term impact which is far greater than the equivalent volume of CO₂.

Q3 – How should New Zealand meet its targets?
• domestic emissions reductions only (including from new forest planting) using some emissions reductions from overseas(international carbon units) that have strong environmental safeguards
  • international carbon credits have not reduced domestic emission. To date they have been ineffective in achieving a low carbon economy and instead been used for financial gain or avoid changes that would bring about emission reduction.
  • under the Act international carbon units should come from credits to prevent indigenous rain forest and other natural carbon sinks from being cleared or support the restoration of natural biodiversity e.g. Indonesia, South America, Africa.
  • the definition of “some” must be quantified and be defined in the Act as being less than a percentage of the total [5%]
  • a substantial amount of the forest plantings should be native species and any marginal land that is unsuitable for food production be returned to indigenous forest and wetland.
  • relying on tree planting is not sufficient, there needs to be a priority given to reduce our building, transport and infrastructure systems greenhouse gas footprint. Large gains come from small changes by many people and companies.

Q4 - Should the Zero Carbon Bill allow the 2050 target to be revised if circumstances change?
• No
  • if the target can change it introduces uncertainty and the ability for short term politics to usurp the primary purpose of actively reducing human induced climate change.
  • it is a certainty that climate science will improve; the climate is changing irrespective of any future understanding we gain about the process. The imperative is to keep below the 1.5 degree increase and limit, as far as we are able, sea level rise.
  • the target needs to be zero emissions to achieve the global goal of the Paris Agreement; it does not need to change.
  • our response to the changing climate should be the same as a natural disaster i.e. earthquake, tsunami, flood etc. The difference is in time; in the case of a natural event it happens very quickly, but a climatic change is a disaster in slow motion.
  • as in any disaster, natural or otherwise, the changing climate will (already has) result in
casualties. Government (local and national), individuals and companies have a shared responsibility to assess risk and act accordingly. The mechanisms are already in place, we need to improve our risk management and avoid mechanisms that will further delay action.

- The UK Act makes provision to change the target because its target is a percentage of a baseline.

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?

- Yes

Q6 - Should the Government be able to alter the last emissions budget (i.e., furthest into the future)

- Yes

- The third emissions budget can be changed before the first budget expires but only to reduce the carbon budget i.e. to effectively bring forward the target date for achieving net zero emissions.

Q7 - Should the Government have the ability to review and adjust the second emissions budget within a specific range under exceptional circumstances?

- No

- the target and a long term plan need to remain in place to provide certainty to all. Political inaction and delaying tactics must not undermine our national commitment to achieve the target.

- Government policies will influence achievement of the emission budgets. Those policies will undoubtedly reflect “exceptional circumstances”. It is the nature of politics to gain favour through policy directives and concessions.

- right now we are experiencing exceptional circumstances with mass species extinctions, rising sea levels, severe flooding, disruptive technology and market volatility. The economic and environmental climate is changing and we need to adjust.

- there will always be “exceptional circumstances” but we do not have the luxury of time to allow these events to ‘reset’ our emissions targets.

- severe weather events and biological security breaches may be considered “exceptional circumstances” but with a changing climate they are becoming the new normal and is the reason why we need to 'hold the line' with emission targets.

Q8 - 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?

- Yes, provided that:

  - the changes to the NZ-ETS (page 44) are consistent with reducing NZ’s actual greenhouse gas emissions and restricts use of international units.

  - it includes the environmental impact on indigenous fauna and flora

  - there is a weighting of the considerations so that:
    - those least able to change easily and quickly are given reasonable time and ability to make the necessary change.
    - gains in technology uptake and energy reduction have more weight
    - environmental considerations are given importance

Q9 - Should the Zero Carbon Bill require Governments to set out plans within a certain timeframe to achieve the emissions budgets?

- Yes

  - the sooner the better for businesses, consumers and local government to plan and adapt.

  - make it a requirement of general elections that political parties to outline their emissions budget plan to cover the current budget term and the following term.

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?
To be considered:

- use of regulatory measures, and not rely solely on ETS pricing.
- incentives to encourage active involvement by industry and citizens
- Treaty justice
- a degree of pragmatism and urgency. Democracy and the concept of a just and fair transition is important and commendable but must be considered in the context of a catastrophic climate change that will not be democratic, just or fair to anyone.
- removal of all fossil fuel subsidies
- incentives for uptake of ‘clean' fuel technology (not gas as a ‘transition fuel’)
- whole of government (all departments and SOE’s) commitment
- forecasts of the impact of plans and policies on consumer behaviour, infrastructure and other resources
- expert advise on interventions to assist societal change

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?

- The Climate Change Commission should be called the Climate Commission and have powers under its own authority within the framework of the Emissions Act.
- The Climate Commission, to be effective, should operate at arms length from Government in a similar way to that of the Commerce Commission and the Reserve Bank.
- The experience of Commissioners as advisors has shown that their voice is too easily disregarded by the Government of the day. The climate is as important to the economy as commercial activity. The Climate Commission should have equal status to the Commerce Commission and Reserve Bank.
- The Climate Commission would be required under the Emissions Act to report to Parliament and:
  - determine and report the emissions budgets necessary to achieve the target.
  - audit budget plans and report to Parliament
  - monitor NZ's progress towards its goals
  - have a duty of care for the survival of indigenous fauna and flora
  - take account of Government policy
  - comply with NZ's international commitments on Climate
  - oversee and regulate the NZ-ETS

Q12 - What role do you think the Climate Change Commission should have in relation to the New Zealand Emissions Trading Scheme (NZ ETS)?

- Decision making role [as outlined on page 43] “…with a very clear role in reducing emissions…”

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?

- Generally, yes,
  - its core role is the “what”, “why” and “when” of climate change; engaging in community engagement and communications is not their core purpose, but an important aspect on which the Commissioners should take advice.
  - The expertise of the Climate Commission should include, ecology and earth science as well as technology innovation.
  - The Climate Commissioners do not need to have all the expertise within the Commission but do need to have access to expertise in Universities (here and abroad), Learned Societies and other parts of Government.
  - the Commissioners should be required to give equal consideration to environmental, economic
and societal aspects.

Q14 - **Do you think the Zero Carbon Bill should cover adapting to climate change?**

Yes

- Local resilience is crucial; NZ has very localised climate, ecology and geology that makes a national plan unlikely to be of value to all communities. However having an overall national plan is better than the current arrangement and does enable a broader picture to be assembled for future planning.
- Local Councils must have rules with a planning horizon that account for sea level rise over the long term (100yrs).
- NZ is an island economy and must adapt to climate change related disruption to trading and tourism.
- NZ has an obligation to assist its indigenous fauna and flora adapt to climate change with habitat protection and restoration.

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

Q16 - **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

- there is always value in open sharing of information
- local authorities are significantly exposed to the increasing impacts of more frequent weather events and lack the funding sources of government and large businesses.
- modelling is needed to predict the resources required across the country and to estimate the finance needed to manage climate change disruption and adaptation.