Submissions form

We seek your feedback on the specific proposals in the Zero Carbon Bill.

Either email this submission to ZCB.Submissions@mfe.govt.nz (Microsoft Word document (2003 or later) or PDF) or post to Ministry for the Environment, PO Box 10362, Wellington, 6143.

Publishing and releasing submissions

All or part of any written submission (including names of submitters) may be published on the Ministry for the Environment’s website, www.mfe.govt.nz. Unless you clearly specify otherwise in your submission, the Ministry will consider that you have consented to website posting of both your submission and your name.

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Personal / organisation details

You must provide either a company name or given name(s)

Company name ____________________________

Given names ____________________________

Surname ________________________________

Contact person ____________________________

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Our Climate Your Say: Submissions Form 1
2050 target

1. What process should the Government use to set a new emissions reduction target in legislation?
   Pick one:
   The Government sets a goal to reach net zero emissions by the second half of the century, and the Climate Change Commission advises on the specific target for the Government to set later.

   Optional comment
   The Climate Change Commission’s role should include consultation and determination of science-based targets.

   Reaching net zero emissions by the second half of the century would allow an in-depth analysis of opportunities and challenges of key policies and plans.

2. If the Government sets a 2050 target now, which is the best target for New Zealand?
   Pick one:
   **Net zero long-lived gases and stabilised short-lived gases**: Long-lived gases to net zero by 2050, while also stabilising short-lived gases

   Optional comment
   The 2050 target needs to consider and treat different gases in terms of actual impacts on climate change. We agree with the emphasis on net zero, on a national basis.
3. How should New Zealand meet its targets?

Pick one:

Domestic emissions reductions (including from new forest planting) and using some emissions reductions from overseas (international carbon units) that have strong environmental safeguards.

Optional comment

A number of industries require technology that may not become available, or is not cost effective to purchase, until nearer 2050. Having the option to purchase emissions reductions from overseas may provide the nation this flexibility in meeting targets.

Local manufacturing cannot be commercially penalised by not being treated on an equal basis as importers. Not taking this into account could affect the competitiveness of our trade-exposed businesses and risks relocation of production to countries with less stringent climate change policies.

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

Pick one:

☐ no

Optional comment

Predictability in the policy and regulatory settings on climate change is important for business planning.

If the ability to change the target is included in the bill, a robust criteria, would be required to respond to significant changes to the economy, the understanding of the science, the technology available. Being able to review the target needs to be done under strict criteria to ensure that predictability is held.
Emissions budgets

5. The Government proposes that three emissions budgets of five years each (ie, covering the next 15 years) be in place at any given time. Do you agree with this proposal?

Pick one:

☐ yes

Optional comment
Long term targets provide certainty with for business investment. Firth agree that longer time periods provide greater predictability for businesses and communities while remaining flexible for the future.

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

Pick one:

☐ yes, the third emissions budget should be able to be changed, but only when the subsequent budget is set

Optional comment
Changing emissions budgets should only be able to occur when there is visibility of the subsequent budgets so that predictability is held.

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

Pick one:

☐ no

Optional comment
We think that a review of the third emissions budget would be enough to sustain predictability and allow the Government to remain flexible to changes in the future. Changes to future emissions budgets would create an environment that is less predictable for New Zealand businesses.
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?

Pick one:

☐ yes

Optional comment
Considerations of particular importance to industry are economic circumstances, fiscal circumstances and technology relevant to climate change.

These circumstances need to be taken into account when advising on and setting budgets to allow an in-depth analysis of opportunities and challenges of key policies and plans.

Government response

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

Pick one:

☐ yes

Optional comment
It is important to set out plans within a timely manner to allow time for industry to plan for implementation.

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?

Comment
The commercial and technical viability of any counter-action needs the input from the relevant industry/s.
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? (pg. 42)

Pick one:

☐ yes

Optional comment

By providing and advisory role, the Climate Change Commission could enable consultation and engagement with all sectors throughout all functions by taking into account by providing a new channel of expert and situational advice.

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

Pick one:

☐ advising the Government on policy settings in the NZ ETS

Optional comment

The government needs to retain control over the ETS, to avoid tension between agencies.

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?

Pick one:

☐ yes

Optional comment

We agree with the requirement for expertise in business/industry and understanding the emissions cost exposure for our emissions intensive and trade-exposed industries.
Adapting to the impacts of climate change

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

Pick one:

☐ yes

Optional comment

All aspects of climate change, present and future, need to be considered in conjunction, considering the risks to the whole of society and the economy.

15. The Government has proposed a number of new functions to help us adapt to climate change. Do you agree with the proposed functions?

- A national climate change risk assessment
- A national adaptation plan
- Regular review of progress towards implementing the national adaptation plan
- An adaptation reporting power

Pick one:

☐ yes

Optional comment

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?

Pick one:

☐ yes

Optional comment

By exchanging information between organisations, a better picture of the risks and opportunities of decisions and changes to legislation can be developed.

The current position of NZ’s GHG environment could be established and a more robust, informed plan could be defined to mitigate or manage risks that have been identified.

Supportive policies would be required to make reporting viable given limited resources to invest in reporting on climate action. Clear criteria would need to be set to ensure adaptable and relevant reporting between and across organisations and industries.