Submission on the Zero Carbon Bill

To: Ministry for the Environment
ZCB.Submissions@mfe.govt.nz

Submitter: Helen Leahy

Te Pūtahitanga o Te Waipounamu
INTRODUCTION

Te Pūtahitanga o Te Waipounamu welcomes the opportunity to comment on the Zero Carbon Bill.

Whānau Ora is based on the belief that a healthy whānau is not reliant on indicators of deprivation but is instead driven by a belief in their own inherent wealth. Whānau wellbeing is intimately tied to the concepts of caring – the application of manaakitanga, wairuatanga, and ukaipotanga.

Whānau Ora recognises the collective strength and capability of whānau to achieve better outcomes in areas such as health, education, housing, environment, employment and income levels. Our relationships encourage inter-dependence; we know that our strength comes through all of us taking up our roles and responsibilities to one another.

Whānau Ora Navigators support whānau to be self-determining and navigate whānau to champion their aspirations. Our Whānau Ora Navigators work with whānau to:

- support them through crisis and link them to the appropriate services
- collaborate, broker services and advocate; ensuring their needs are addressed in a holistic way.
- Help develop a step-by step plan to achieve their goals and aspirations.
- Identify and strengthen support networks.
- Reduce any risk of harm to whānau.
- Uplift mana and create opportunities for cultural connectedness.

The Whānau Ora approach is unique because it:

- recognises a collective entity,
- endorses a group capacity for self-determination,
- has an inter-generational dynamic,
- is built on a Māori cultural foundation,
- asserts a positive role for whānau within society and,
- can be applied across a wide range of social and economic sectors.

Te Pūtahitanga o Te Waipounamu is the Whānau Ora Commissioning Agency for the South Island. We work to respond to whānau innovation, to foster and grow inspirational ideas that are whānau-centred, intergenerational, locally driven, and provide direct impact for whānau to enable independent transformational change.

We represent a legal partnership of Ngā Iwi o Te Waipounamu, the nine iwi of the South Island: Ngāi Tahu; Ngāti Rarua; Ngāti Tama; Ngāti Kuia; Ngāti Koata, Rangitane o Wairau, Ngāti Apa ki te Rā To; Ngāti Toa Rangatira, Te Atiawa. This unique initiative is the first time, ever,
that the iwi has come together for a common cause to trailblaze a new model that reflects the aspirations of ngā iwi as they relate to whānau.

As our name suggests, we reflect the convergence of the rivers of Te Waipounamu, bringing sustenance to the people and reflecting the partnership’s founding principle of whanaungatanga.

GENERAL COMMENTS

Te Pūtahitanga o Te Waipounamu supports the purpose of the Zero Carbon Bill, which sets the long-term commitment to transition New Zealand to a low emissions, climate-resilient economy. We note that this will significantly alter New Zealand’s climate change landscape but acknowledge the need to address climate change which is already causing severe impacts on our weather patterns, ecosystems, and across communities throughout Aotearoa.

While climate change places compounded stress on our environment, it also places stress on our economic, social and political systems. Today, people from around the world are feeling the effects of climate change, with people living in the world’s poorest countries and communities are the most vulnerable. Rising sea levels, extreme weather events and prolonged drought has the potential to force people to move away from their homes and create refugees. By amplifying existing environmental, social, political and economic challenges, climate change increases the likelihood of competition and conflict over resources. However, while climate change can lead to conflict, it can also provide an opportunity for collaboration. These challenges present a unique opportunity for collective action and cooperation to mitigate the impacts and Te Pūtahitanga o Te Waipounamu supports a collaborative approach to addressing the impacts of climate change.

Te Pūtahitanga o Te Waipounamu currently works with whānau from vulnerable communities. We believe that any climate change strategy will need to reduce poverty by increasing food security, enhancing social cohesion, and strengthen governance that is inclusive of these vulnerable and marginalised communities.

Te Tiriti O Waitangi

We note that while there has been every attempt to engage and consult with communities including hapū and iwi, Te Pūtahitanga o Te Waipounamu would expect that the Zero Carbon Bill would include a reference to Te Tiriti o Waitangi to reflect the Government’s commitment to partnership, protection, good faith, equality and equity. Applying Te Tiriti principles will allow a partnership approach to developing policy, processes, and systems, and delivering actions, services and changes within the climate change arena that will affect, and impact upon Māori.
Climate change impacts on Māori asset base

New Zealand is highly dependent on natural resources through its reliance on agriculture, forestry and tourism. With almost 50% of the total Māori assets base invested in forestry, agriculture, fishing and tourism, a large part of the Māori economy is vulnerable to climate induced impacts. The broader social, economic and cultural impacts of climate change on Māori communities are also expected to be disproportionate, due to the remote location and the low economic status of many communities. A disproportionate amount of Māori land is remote and marginal. Due to the socio-economic disparities of many whānau, hapū and iwi and the collective ownership model many Māori businesses operate under, the ability and speed at which Māori businesses and their communities can make strategic decisions regarding adaptation to climate change may be less agile when compared than other communities and thus create further challenges for these communities.

Other impacts on all Māori involve climate change mitigation policies such as increased fuel costs and taxes related to greenhouse gas emissions. The lack of clarity around carbon policies (e.g. carbon credits for the creation of ‘carbon forests’) has caused many Māori businesses to delay making appropriate investment strategy decisions. This lack of clarity is limiting their options for the future. There is an increasingly complex range of production factors to consider and there will also be indirect impacts on international export markets and policies, which Māori businesses will also have to navigate.

Broader impacts on Māori communities

As extreme weather events increase in frequency, there is increased risk of damage to life line services such as roads, buildings, utilities and flood and fire protection structures, especially in isolated areas. Many coastal Māori communities will be vulnerable to sea-level rise, high tides and widespread coastal inundation. These changes will result in the erosion of coastal infrastructure (e.g. roads, homes, and utilities) and the loss of inter-tidal mahinga kai (food gathering) areas and sacred places (e.g. urupa and marae situated close to the coast). There will also be major issues in localities and communities where reticulated water supply systems are poorly developed or do not currently exist.

A further obstacle for whānau, hapū and iwi will be to gain access and to implement technical information within their businesses and communities to respond to climate change. It is therefore critical for whānau, hapū and iwi to be able to become actively involved in the governing and planning processes around climate change adaptation strategies to develop climate change capability so that their unique systems and circumstances are accommodated for in future planning.

For example, Te Pūtahitanga o Te Waipounamu supports the inclusion of pre-1990 forests included in the Emissions Trading Scheme. Many iwi received large tracts of forests as part of their treaty settlements. Under the Kyoto Protocol, such forests were not included but the Paris Agreement leaves this for each country to decide for themselves. The large tracts of forestry many iwi received were pre-1990 and therefore could not be included in the
Emissions Trading Scheme under the Kyoto Protocol. This new fact could see a global shift towards giving existing forests more recognition under the policy for the carbon they sequester which could assist many Māori businesses in land-based industries. If pre-1990 forests are included, then New Zealand’s emission targets become infinitely easier. For agriculture, it would mean that the Government is already achieving the Option 2 target of stabilised methane and offsetting nitrous oxide. Only the most stringent Option 2 targets such as stabilising methane back at 1970 or 1950 levels would require significant reductions.

The question is why are they continuing to insist agriculture will face a 30-year transition? This major transition is only required if the pre-1990 forests are excluded.

**SPECIFIC COMMENTS**

We note that the Discussion Document sets out four key proposals that will underpin the Zero Carbon Bill:

- a new, net zero emissions target for 2050;
- a requirement on Government to have three five-year emissions budgets in place at any given time, as short-term targets;
- the establishment of an independent Climate Change Commission to provide long-term independent, expert advice and hold governments to account; and
- a requirement on Government to have national climate change risk assessment and adaptation plans.

Te Pūtahitanga o Te Waipounamu notes that the consultation document asks for public feedback on three target options that could replace our current target of fifty per cent reduction below 1990 levels by 2050.

Te Pūtahitanga o Te Waipounamu supports the requirement on Government to have three five-year emissions budgets in place at any given time, as short-term targets.

We also support the establishment of an independent Climate Change Commission to provide long-term independent, expert advice and hold governments to account. This Commission must be strong enough that they are able to sanction the Government and hold them to account rather than just make recommendations that can be ignored or minimised by the government of the day.

We note that the document also asks whether the target should be legislated or set in a two-stage process based on advice from the proposed Climate Change Commission, and whether the Bill should allow the target to be revised based on changing circumstances. The Government envisages the Climate Change Commission having an independent advisory role, like the United Kingdom model, including in relation to the New Zealand Emissions Trading Scheme.
Te Pūtahitanga o Te Waipounamu does not consider the advisory role is as strong as it could be. Recommendations must be acted upon rather than a government simply taking these recommendations under advisement and then doing little else with them.

Te Pūtahitanga o Te Waipounamu supports the requirement on Government to have national climate change risk assessment and adaptation plans. This would assist those communities that particularly coastal communities that will need much support for adaption to the effects and impact of climate change.

Perhaps the most significant issue out for consultation is the type of emissions that will be covered by the 2050 net zero target. The three options the Government has identified are:

1. **net zero carbon dioxide**;

This target would reduce carbon dioxide emissions in New Zealand to net zero by 2050 but we note that other gases like methane or nitrous oxide, which predominantly come from agriculture are not included in this.

2. **net zero long-lived gases (CO2 and nitrous oxide) while stabilising short-lived gases (including methane)**;

This target will reduce emissions of long-lived gases (including carbon dioxide and nitrous oxide) in New Zealand to net zero by 2050, while stabilising emissions of short-lived gases (including methane) either at current or reduced levels.

3. **net zero emissions across all greenhouse gases (most ambitious)**.

This target will reduce emissions across all greenhouse gases to net zero by 2050.

The impact of this Bill on the agricultural sector will depend to a very large extent on which target is chosen, because the principal emission from agriculture is methane.

Te Pūtahitanga o Te Waipounamu supports the establishment of the framework now for the transition to a low carbon economy over the next thirty years. New Zealand businesses can have more certainty and be better prepared for the transition, rather than face a sudden shock later ultimately impacting on whānau. Creating incentives for businesses to transition to a lower carbon economy will be an essential part of this process and Te Pūtahitanga supports this. However, we do not think that the agriculture sector which contributes over 50% of New Zealand’s total emissions should face a thirty-year transition. Action must be taken now, and this sector has so far not participated in the reduction of methane and its effects on the environment.

Kaitiakitanga is about fostering and protecting the sustainability of the business and of the environment it operates within. Kaitiakitanga is how we seek to restore our ecosystems and to replenish natural resources. It is about protection, preservation and guardianship. Some
might call this your ‘ecological footprint’ or footprint analysis – the mark we are making on the world. On current estimates humanity is exceeding its ecological limits by 39%; a fact which alerts us all to the urgent need to ‘do something’ to invest in the wellbeing of future generations; and the sustainability of the planet. Kaitiakitanga expresses itself in the sustainable maintenance of resources for future generations.

Te Pūtahitanga o Te Waipounamu recognises the importance of a healthy environment and the seventh Pou¹ posits that whānau living in Te Waipounamu are responsible stewards of their living and natural environment. Climate change continues to impact upon all New Zealanders and using the tax system to ensure producers and consumers face the real costs of emissions and other environmental harm could be one way to meet our international obligations and especially our responsibilities to our future generations.

We note that the productivity of the New Zealand economy is well below other OECD countries, but we also note that many producers receive an environmental service such as the use of water at a fraction of the cost to themselves but the accompanying environmental cost – substances released into the air, water or land, the resulting pollution and the associated cost of that pollution is met by the rest of society. These environmental costs must be reflected in the actual costs of the products being generated and this cost must be met by the producers in the first instance and by the consumers who buy the product.

To this end, Te Pūtahitanga o Te Waipounamu supports the best option that would set the long-term commitment to transition New Zealand to a low emissions, climate-resilient economy that supports even the most vulnerable communities throughout Aotearoa.

Te Pūtahitanga o Te Waipounamu notes that the Government is also looking to set shorter term emissions budgets and is seeking views on how they should be designed. Key elements to be decided include the duration, revision, planning and monitoring obligations, and the consequences if there is a failure to meet the budget. Te Pūtahitanga o Te Waipounamu supports further collaboration with whānau, hapū and iwi as to what the duration, revision, planning and monitoring obligations, and the consequences would be if there is a failure to meet the budget.

Finally, the discussion document suggests introducing an obligation on Government to publish national climate change risk assessment plans, and national adaptation plans. This is to recognise that some climate change is already locked in, and that as a country we will need to improve and co-ordinate our risk analysis and ability to adapt to the effects of climate change. Te Pūtahitanga o Te Waipounamu supports this in consultation with hapū and iwi. Organisations (including, potentially, private companies that provide public services like energy and transport) should also be subject to reporting obligations in relation to climate change risks and opportunities.

¹ Whānau Ora Outcomes Framework, endorsed by the Whānau Ora Partnership Group on 26 August 2015
Te Pūtahitanga o Te Waipounamu welcomes the opportunity to meet with the Ministry for the environment to discuss any aspect of this submission.

Helen Leahy
Pouārahi/Chief Executive
Te Pūtahitanga o Te Waipounamu