

Submission on the “Zero Carbon Bill” Discussion Document

From:

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2050 target

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

the Government sets a 2050 target in legislation now

Optional comment

We should set a strong target for 2050 now. The potentially calamitous consequences of climate change by the end of the century (or before if insufficient action is taken) are too great for any nation to be weak-kneed about this. As one of the globally highest per capita emitters of GHGs (5th out of 31 OECD nations) we have a big responsibility to act strongly.

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.

Optional comment

We should aim for net zero emissions of all greenhouse gases by 2050. Although short-lived gases can be stabilised their current levels are a major contributor to climate change. As globally methane levels are now far higher than they were pre-industrial we must play our part in returning them to pre-industrial levels or by counteracting their effects by absorption of equivalent amounts of CO₂. This will need major reform to our agricultural industry, almost certainly away from dairying and meat production and to high value diverse horticulture.

In order to prevent calamitous climate change by the end of the century and beyond there will be a need for net negative GHG emissions. I am influenced in this assertion by Hansen et al. (2017 Earth System Dynamics, vol. 8, p577-616). I cannot recall any mention of this necessity in the Discussion Document. It should be part of the discussion and goals.

How should New Zealand meet its targets?

domestic emissions reductions only (including from new forest planting)

Optional comment

Using only domestic emissions reductions would make us focus much more rigorously on changes that need to happen in NZ. Paying for international units would divert funds away from using them to stimulate the changes needed in NZ. These changes would also make us economically stronger and provide a better quality of life for all.

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

may be depending...

Optional comment

May be. If the scientific consensus becomes one that states we have to take even stronger actions to prevent dangerous climate change then, yes, the target should be able to be revised. Likewise, in the unlikely circumstances of the scientific consensus being that the target could be weakened because climate changes have been over-estimated. However, if the changed circumstance are that it appears we are not going to reach the target or that it is going to cost more than originally estimated, then, no, the target should not be revised. So the opportunity to revise the target depends on the nature of the changed circumstances.

Emissions budgets

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?

yes

Optional comment

This seems to be a good time frame. It more or less conforms with the period between publication of IPCC assessment reports. Might it be worthwhile to assess emissions budgets in the year following publication of each new round of IPCC assessments? This would allow the latest global scientific consensus to be more quickly taken into account. A three year review of policies aligned with the electoral cycle would open up the process to political "games playing". This is an issue which requires a strong commitment to being influenced by scientific evidence in decisions on policy without being diverted by party politics during elections.

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

Pick one:

yes, each incoming Government should have the option to review the third budget in the sequence

Optional comment

Yes, there should be an option to review the third budget according to whether scientific evidence shows it to be too weak or too strong to achieve climate change goals. As evidence changes at unpredictable times then there should be broad capacity to change budgets accordingly, i.e. not linked to the subsequent budget.

Should the Government have the ability to review and adjust the second emissions budget within a specific range under [exceptional circumstances](#)?

Pick one:

yes

no.

Optional comment

Difficult to answer as “exceptional circumstances” needs further definition. For instance, “a natural disaster” is increasingly likely to be caused by climate change. If such occurred then it would seem ironic to weaken targets in response to such. The potential consequences of dangerous climate change are so great that may be we should be willing to accept some drop in income / living standards if such are necessary to avoid far worse consequences for future generations.

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

Optional comment

The six factors listed in the Discussion Document are all important and should be taken into account. These factors could be arranged in a hierarchy of importance with those towards the top of the hierarchy having greater influence on the final decisions. For instance, if scientific knowledge suggested that we had to set much more ambitious reduction targets then these should be put in place even if impact on economic circumstances was negative in some regards.

It is stated that the Commission could also consider three governmental objectives. These include a “sustainable economy”. What does this vague objective mean? It often rears its ugly head and can be interpreted in so many ways as to be meaningless without further definition.

Government response

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

yes

Optional comment

Yes. I imagine that when a five year budget is set, ten years ahead of its starting date, then there should be at least a framework of ideas in place about how this could be achieved based, for example, on knowledge of available technologies and the stage in development of ones with promise. These plans should then be regularly up-dated as, for example, knowledge increases and new technologies reach the implementation stage. Perhaps this could be done annually??

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

It is very important to keep absolutely up-to-date with all areas of science and technology relevant to reducing emissions and reabsorbing GHGs from the atmosphere. Contact has to be maintained with the global community that is working in these topics.

It is very important to communicate plans to the public in such a way that they will be generally accepted as being appropriate for purpose. The process has to be completely open to the public. The ways in which necessary changes will improve lives and avoid the worst effects of climate change must be emphasised.

Equity issues must be considered. In particular plans must not disadvantage the poorer socio-economic sectors of society. Those who are able to should shoulder the greatest cost and impacts of actions.

Climate Change Commission

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?

yes

Optional comment

Yes, advice and monitoring but not final decision-making. The latter should go through the parliamentary process. We succeed or fail based on our democratic decision-making processes. However, the expertise of the Commission should be recognised by having the government of the day needing to respond with detailed reasons why particular advice might not have been followed. The Commission should then be able to reply and give reasons why the government's response

might be at fault. The electoral system will subsequently provide its response to the government's final actions.

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

advising the Government on policy settings in the NZ ETS

Optional comment

Advising the Government on policy settings in the NZ ETS with the same provisos and processes as suggested in the previous answer.

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?

yes

Optional comment

Yes, the range of expertise listed in the Discussion Document seems to cover important areas. May be there should be additional representation in the science of climate change. 1) broad up-to-date expertise in the modelling of future climate change using the best available data and best knowledge of biogeochemical processes. 2) broad up-to-date knowledge of the evidence for the utility of approaches for reducing emissions and absorbing GHGs from the atmosphere. Both are unlikely to be found in a single person. Both are central to the primary goal of budgeting for GHG emissions reduction.

Adapting to the impacts of climate change

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

yes

Optional comment

Yes, the adaptation provisions described look sensible. A coordinated comprehensive overview of the risks, plans and progress is important. The Discussion Document emphasises our lack of knowledge of future impacts of climate change. Filling these gaps will require the funding of research. The Commission could have the responsibility of choosing the most worthwhile research and be funded to support this in the form of grants to appropriate institutions.

The Government has proposed a number of new [functions](#) to help us adapt to climate change. Do you agree with the proposed functions?

yes

Optional comment

I do not understand the reasons why you propose that the Government should hold responsibility for the national adaptation plan rather than the Commission. If the Commission coordinates the risk assessment then wouldn't the results of this feed directly into an adaptation plan? You suggest that the Commission should review implementation of the plan. Wouldn't this be more effectively pursued by the body that formulated the plan?

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

Optional comment

Yes, important and with regular up-dating. For timely action to occur then it is important that the entities listed in the Discussion Document are legally obliged to assess and report on the risks of climate change on their operations. Why shouldn't there then be an obligation to act on mitigating those risks? In the medium to long term this would be beneficial for the whole of society.

Final comments:

It is very heartening to at last see a significant move in the right direction on this critically important issue. However, from what I have read about climate change over the last many years the suggested goal here will still not be enough to take us out of the danger zone. That this is likely to be the case

should be explicitly and clearly stated in future discussion documents and even in the final Bill. We will need net negative emissions.

I am also concerned about bio-bunker fuels which, if I am correct, are not considered in our GHG emissions calculations. We have an economy that is now heavily dependent on international tourism and there are desires to greatly increase in-coming tourist numbers on increasing numbers of aircraft flights. Recent research has reported on the large underestimation of GHG emissions from the tourist industry in general and it is increasingly a major emitter of GHGs. If we are serious about mitigating climate change then we cannot simply sweep this source of emissions under the mat. So I would like to see inclusion of recognition of this problem and policies to deal with it in the final Bill.

In several places in the Discussion Document I have the feeling that the desire to maintain economic growth (is that what is meant by 'sustainable economy'?) would be put before strong measures to reduce GHG emissions if the latter would reduce (or eliminate) economic growth. I am of the belief that the threat of climate change is serious enough for us to take actions that would impact on the size of the economy. I suppose it is all risk assessment but if the risk of inadequate action is likely to be calamitous for society then economic stasis for a period would be preferable by far. Of course, the damage to communities due to economic stasis could itself be mitigated by policies to move towards a more equitable distribution of wealth.