

Your submission to Zero Carbon Bill

Linda Hill

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Submitter Type: Individual

Clause

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

Position

The Government sets a 2050 target in legislation now

Notes

Clause

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

Position

Net Zero Emissions - Net zero emissions across all greenhouse gases by 2050

Notes

Clause

3. How should New Zealand meet its targets?

Position

Domestic emissions reductions only (including from new forest planting)

Notes

We should not be buying (probably dodgy) emissions credits from other countries, or sell any surplus of ours to other countries. If the world is going to achieve this, not just play market gambling games, we all need to pull our own weight with serious policy to achieve serious reductions asap.

Clause

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

Position

No

Notes

Only if we meet our targets early and can reduce emissions even further. But that's unlikely on our present record!

Clause

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

Position

No - emissions budgets should not be able to be changed

Notes

If we do better than the target on one budget, the next budget should be for the same amount of reduction so we reach the overall goal faster. You know we have to tie our govts into this legislative programme

Clause

7. Should the Government have the ability to review and adjust the second emissions budget within a specific range under exceptional circumstances? See p36 Our Climate Your Say

Position

No

Notes

This is the exceptional circumstance - the planet is frying.

Clause

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

Notes

I like the three government objectives for climate change policy: sustainable economy, global and local leadership and creating a just and inclusive society. I like the Treaty of Waitangi consideration. Bullet points 3-6, esp the 'in particular' bits, sound like a future Commission/govt could use them for good or ill - and they must be used to achieve the emissions reduction goals. I'd like to change the words 'in particular' for 'despite'. They must have some flexibility, sure, should look at these bullet point in order to achieve but may not use them to under-budget or under target or under achieve they have to get us to net zero by 2050 Can you please write it

that way? You know that before 2050 we risk getting another govt that doesn't give a damn. Could allow flexibility to maybe identify and include further factor themselves if necessary without needing new legislation

Clause

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

Position

Yes

Notes

yes, well ahead of time.

Clause

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?

Notes

I agree with the govt's energy and transport goals so far and the billion trees (only 217 each over 10 years), what worries me is that land use change policies won't be strong enough, it'll just be 'nudging' that gets nowhere, party political compromises etc. We need to seriously reduce dairy and other ruminants and move to more crops (instead of importing grains/pulses) and more horticulture and stop importing so much stuff we could grow, with freight emissions we don't count. Govt needs to MAKE this happen, not just encourage.

Clause

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

Notes

1-4 functions agreed. Not 5, that's buying other people's dodgy carbon credits again, isn't it? We MUST NOT allow that, we have to do our own reductions, meetin our own targets in this country.

Clause

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

Position

Makes decisions itself in respect of the number of units available in the NZ ETS

Notes

AND advises govt on stuff. Transparent monitoring and analysis of the ETS and how it's working and published advice to govt. Sorry, don't trust every possible govt between now and 2050

Clause

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

Position

Yes

Notes

The 8 essential area of expertise should be pretty much covered between them, but they should also be able to second any expertise they need. Never mind the business competitiveness, that's not the goal, we don't need BNZ on this. Not everybody needs to be a fancy professional, just expert and good at what they do and seriously personally concerned about climate change. Make sure there are lots of women and Maori and someone from our low lying Pacific territories all thinking about the future for our kids, not about business as usual.

Clause

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

Notes

No, that's a different issue, heavily involves local govt decision making, it's a whole other important project, might need a whole other Commission/body to work with this one. But at the moment I want us to focus on STOPPING change, not adapting to it!

Clause

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

Notes

I like bullet points on top of p.48 and CC Adaption Tech Working Group and national adaptation plan, but this should not be conflated into the work of the CC Commission in reducing our emissions, overseeing the ETS (since govt has chosen that as main plank) and helping NZ prevent climate change. As in 14 above, this needs a whole different group and progamme of work involving local govt and different players. PS I hate the word resilient - it means 'oh how good you are at continuing to put up with shit' - and 'adaption' is a bad idea too, I don't want us to adapt because I don't think we can. How about 'Facing climate change'?

Clause

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?

Notes

Yes govt should be responsible for this, they'll probably have to pay out for various disasters, but as well as govt and building it into govt depts' role/programmes, there needs to be an overview body that reviews coordiinates directs reports, advises govt and local govt, etc But not the CC Commission because this has a very different role/goal, they could work together where appropriate

Clause

Do you have any other comments you'd like to make?

Notes

Thank god government is finally taking this seriously, because it's seriously scary.

Supporting documents from your Submission

Hill_submission_Climate_Change_Targets_3.6.15.pdf

Uploaded on 07/04/2018 at 05:13PM

Hill_sub_Productivity_Commission_6.6.pdf

Uploaded on 07/04/2018 at 05:14PM

Linda Hill (PhD)

Submission on the government's Climate Change Target Discussion Document

I am a retired policy researcher living on the Kapiti Coast. Although it's not an area I have worked in, I try to keep up with the science of climate change – it is the issue that keeps me awake at night.

I agree totally with the Discussion Document's opening statement that world-wide action to reduce green house gas emissions has not been strong enough. Certainly New Zealand's hasn't. Per head of population, New Zealand is the world's fourth highest carbon emitter. With successive governments fluffing around, engaging only in an ineffective emissions trading policy, we have failed dismally on bringing emissions 5% below our 1990 level by 2020 . This is acknowledged in the Discussion Document, which states we are currently heading for 35% above the 1990 level by 2020 (p.14) if we carry on like this, and appears for that reason to be suggesting letting our 2035-2040 performance slip to 15-20% above 1990. That is not acceptable.

On the contrary, our failure to date means New Zealand needs to take serious action to achieve our 2020 target, even if late, *and also* to reduce emissions by a similar amount for the 2020 to 2035 period. We need to get serious about this. The reason we are so far behind is that governments set the current target then did little or nothing to achieve it. To do our share to keep global warming to an average increase of 2°, we need a very ambitious domestic targets from now on – and we need to implement a serious and ambitious set of cross-government policies to make sure we achieve them.

Relying, even partly, on an international emissions market to exist, to work, and to have high enough prices get ourselves out of this hole by purchasing other countries' carbon credits is, in my view, a totally inadequate and irresponsible approach for New Zealand governments to take. It *does* matter where emission reductions occur (p.11); it has to happen in developed countries like ours with higher per capita emissions. If New Zealand, with our energy advantages, can't – or won't bother – to reduce emissions, who will?

What does climate change mean for New Zealand?

A 2° global average increase, let alone the very possible 3.5° or 4°, will include fluctuations and regional variations and effects that, as you say, could devastate our temperate climate agriculture, forestry and fisheries. Changes already being reported include Antarctica ocean warming and iceshelf thinning that is sending 'roaring forties' weather further north, towards us. High ocean temperatures in the tropical Pacific are expected to bring an El Niño this year, and more frequently. The Discussion Document doesn't mention the effects rising temperatures as well as extreme weather can have on temperate food plants (germination, pollination systems and fruit setting). It does mention the human costs of regional climate change and how New Zealand will deal with those. New Zealanders will expect to welcome the small populations of Tuvalu and Tokalau once the water gets to their knees, but what about South East Asia, one of the regions where food production

is expected to be hardest hit by changing temperatures and shifting rainfall patterns? Little New Zealand can't solve climate change on its own, you say; but we *will* have to face on our own all the future problems that result from climate change— so we had better take effective action now.

Now that governments have had to recognise the science, please don't let's hide behind 'uncertainties' about international agreements, rules and technology, so as to waste more time doing very little. No, we are not 'unusual', and therefore to be excused, because we 'feed the world' with lovely dairy products from farty cows. This is spurious argument. The 850 million who do not have enough to eat cannot afford imported New Zealand cheeses, baby formula, or meat. This is the most important policy matter facing our generation – and our grandchildren's. The economic costs the Consultation Document discusses pale beside the costs of continuing to do nothing. Make no mistake, *our economy can't afford climate change*. Effective action will require political will – considerably more of John Key's 'guts' than troupe deployment. Carbon markets and land use policies are not enough – what we need is *a raft of integrated cross-government policies* that go much wider than that. I suggest some further below.

To focus minds...

I'd like to draw attention to the recently released **Oslo Principles on Global Climate Change Obligations**, adopted by an impressive team of experts in international law, human rights law, environmental law and other law. These principles articulate the essential obligations that states have *under current law* to avert the critical level of global warming. No, not just an worthy statement by an august body – this is the basis in law on which countries like Bangladesh and Tuvalu are entitled to sue billions out of countries like us who now know we are causing excess emissions, know we should be doing something, and in fact do very little.

The Discussion Document asks what is a 'fair' target, what would other countries think is our 'fair' contribution. This reads as, what is the least that we can get away with? It acknowledges that our per capita greenhouse gas is twice the global average. Then fudges the fact that New Zealand's 'unique' contribution to global warming is disproportionately methane driven. And Box 3 fudges on the effects of methane. Methane is shorter lived than CO² but more efficient at trapping radiation, so its impact on climate change is *25 times greater* over 100 years (US EPA).

To me, these sections of the Discussion Document read as morally bankrupt – and in the light of Oslo Principles, legally risky. We all –all countries – need to be honest in our efforts and *doing everything we possibly can*, to avert the biggest environmental *and economic* disaster we could ever face.

Q.1 What do I think of the Objectives?

I think the three stated Objectives are rather vague and woolly. How do they link the goal of reducing New Zealand's emissions to any concrete actions? They don't. The government appears to have no plan, beyond picking a number for Paris. The Document is focused on persuading us to approve a low target, as long as it doesn't reflect too badly on our international image.. It provides a cryptic paragraph about modelling and discusses how our choice of target will affect our economy and household incomes. What is glaringly missing is what our current path of emissions and global warming will cost the economy and households. It is distorting to consult on setting an international target in this way, devoid of any serious discussion of what the government is actually going to do about it and how. The only policy clues are 'uncertainties' related to Costs of the Target (p.13), which reflect an approach that is already failing.

1. *It is seen as a fair and ambitious contribution – both by international and domestic audiences*

Given that we are slipping behind our present 5%-below-1990-by-2020 commitment, it is time for us to focus on the 'ambitious' part of this objective. Every country no doubt sees its own 'unique national circumstances'; there are plenty of ways New Zealand can reduce our emission markedly if we actually try, starting with government leadership and effective wide-ranging policies.

2. Costs and impacts on society are managed appropriately

We need more than management of the costs and impacts on society; we need government to take a strong in managing the whole change to a low carbon economy, including agriculture, transport, energy and industry - through intergrated policy and budget redirection (including shifting subsidies/incentives from high to low carbon options.

'Appropriately' is a bit of a weasel word. It is not appropriate to be 'fair' to carbon fuel industries; it is inevitable that they be phased out; they should diversify fast. High emission industries have been passing the cost and environmental impacts of their production on to everyone's grandchildren. Carbon charges are not 'unfair' to high emission industries, or even to small farmers; they are a market signal. It is intended that not pay these charges by changing by their practices - their type of energy business, their livestock, pasture and fodder, go organic, whatever – there are many options. Transition should be supported but not totally paid for. Offshore ownership of production decisions means that regulation, as well as carbon charges, will probably be needed to achieve a fair transition.

3. It must guide New Zealand over the long term in the global transition to a low emissions world

It will take more than a target or a weak emissions trading scheme to do that. It will take serious planning by government, and a set of strong interrelated policies across government departments, supported by future-focused business and agricultural sectors. The market will not deliver on its own.

Instead, I support an ambitious target and a better set of Objectives for policy action

The government needs a Grand Plan, one we can all believe in and get behind. This Discussion Document doesn't even hint that they have one. Its current emission trading policy has failed, so relying on the emergence of a international emissions trading market that actually works (p.13) is not a plan. Shuffling credits between fluctuating (or failing) economies does little to reduce global warming. And why would New Zealanders want to send our taxes offshore to 'invest' in other countries' carbon sinks instead of our own?

A better set of Objectives would direct the goal of carbon reduction to the key areas in which policy and action are needed:

- Agriculture
- Forest
- Energy
- Forest
- Transport
- Industry (including Fair Transition)

Targets need to be set in each of these areas, with a wide ranging but highly integrated set of policies to achieve them. Some of this will be about redirecting budget and current incentives from carbon fuel industries to new tech and low carbon business. Regional development policy will be

important to ensure a Fair Transition for employees. All Cabinet papers should require statements on 'Implications for emissions reduction and fair transition'. Regulatory transition periods must be very short (like, next 1 April), to avoid industry shenanigans like the Waikato forestry-to-dairy conversions to preempt carbon credit restrictions, and Shell Todd 'forgetting' to apply for its EPA consent.

Effective policy will have to include a tax on carbon and other greenhouse gas emissions. Clearly New Zealand's current emissions trading scheme has been a dismal failure – see Box 7, p.14 – and we need to bite the bullet.

New Zealand's largest dependence on fossil fuels is for transport, a key area for policy change. Serious policy action to shift people and freight onto rail and other electric transport can reduce emissions and reduce the overseas deficit. This is a far better use of tax revenue than buying other countries credits. New goals should be set for Land transport that get them over their fixation on expensive expressways to save a few minutes.

Q.2 What do I think of the nature of New Zealand's emissions and economy means for the level of target that we set?

I think that the nature of the above fudging on methane means the government is trying to set targets that are too low. Every country has its own set of circumstances to respond to. We can't continue to exempt agriculture, just because we have comparative advantage in our energy sector. We can't continue the expansion of the methane-producing (and nitrate polluting) dairy industry over former forestry and crop lands, and allow its disproportionate influence. We need agriculture and horticultural diversity. We need value-added forestry.

I'd rather New Zealand set and failed to meet an ambitious target than failed to try hard enough. Let's forget about what 'audiences' think, and other countries' costs, and take this issue seriously. If between 2005 and 2020 we are supposed to get to 5% below our 1990 level, then surely we should **set a target of at least 15 % below the 1990 level by 2035. New Zealand policy should also set separate domestic targets for carbon dioxide, for methane, for nitrous gases and for synthetics.**

Q.3 What level of cost is appropriate for New Zealand to reduce its greenhouse gas emissions? For example, what would be a reasonable reduction in annual household consumption?

You can't just buy a new climate cheap! That's how we got where we are, by not counting and costing environmental impacts. By governments relying on 'the market' instead of on research evidence and effective policy action.

Moreover, Q.3 is a badly slanted question, directed to get a 'do nothing' response. The paragraph on carbon price modelling and economic impacts is too cryptic to be useful. A fair question would include discussion of the economic and social costs of even a 20 average increase, and extremely high costs if we fail to keep to that. It should also be based on the discussion of the opportunities in the next section. The potential costs of climate change, fiscal costs of policy action and potential economic benefits of low-carbon agriculture, transport and industry and getting into new technology fast should all be taken together. A good proportion of the fiscal costs will be in redirecting budget, subsidies and incentives.

Q4 . Of these opportunities which do you think are the most likely to occur, or be most important for New Zealand?

I see a lot of opportunities in shifting direction from what we have been doing in recent years. Our high emissions, high fuel miles economic is very recent; we don't have to do things that way. We can diversifying agriculture to more non-emitting stock, crops and horticulture; expand forestry land and export added-value timber and furniture; shift people and freight onto electric rail and other transport. Public transport and rail freight would be far more effective in reducing emisissions in the next 20-30 years than carbon trading (Sims, *Dominion* 10.11.2014).

Q5. How should New Zealand take into account the future uncertainties of technologies and costs when setting its target?

Life is uncertain. However, a great deal of international and New Ealand research has gone into warning us about what is happening to the planet, and why. An global average temperature rise of at least 2° is already certain. It is certain that New Zealand's carbon emissions are rising, not being reduced. So let's do something about it.

Strong leadership is needed now – let it be your legacy.

PS: Here are a few policy suggestions:

- A target of 15% below 1990 levels by 2035
- Domestic subtargets for carbon dioxide, methane, nitrous oxide, synthetic greenhouse gases
- An integrated set of targets and policies for agriculture, forestry, energy and transport
- Publicity and promotion – never mind carbon credit, take political credit!
- Shift agriculture focus to low emission animals of all types or more horticulture
- Lower use of artificial fertiliser through soil science and pasture/plant diversification (eg lucerne), or tapping into the high end international market for organic foods – New Zealand’s great lost opportunity.
- Stop importing food we used to grow here – like Canterbury wheat.
- Expand land in forestry; incentivise industries to use NZ wood rather than sell imports
- Support a Fair Transition away from coal on the West Coast
- Drop exploration permits and subsidies for oil and gas;
- Refine more of our own oil and gas for petrol, instead of selling it offshore, buying it and paying all those tanker costs in the price. Post peak oil, we’ll always be last in the deliver/profit chain.
- Policy and investment that shifts people and freight off the roads and onto electrified public transport and freight trains
- Call Rio Tinto’s Bluff and let them go off shore; instead subsidise another business for a year or two to go down and provide jobs (regional policy). We’d then have lots of spare, cheap electricity to underpin the transition to a lower carbon economy, including more public transport and rail freight.
- Tax aviation fuel like we do car fuel – or, if that’s too much of an international effort, increase that new travel tax. Air travel is far too cheap; I can fly to UK for less than in 1970.
- Legislate short fixed transition periods for any regulations (like, next 1 April) to ensure no more gaping loopholes and rorts like the Waikato forest-land-to-dairy or Shell Todd ‘forgetting’ to apply for its Environmental Protection Consent.
- Stand up to business sector pressures: they know it’s got to happen, they have grandchildren too. But they’ll push the envelope if it works.
- Bit the bullet fast and be able to market the New Zealand economy and produce as low carbon. The people who buy clean-green New Zealand agricultural produce worry about the planet. New Zealand can *increase* its competitive advantage if we take this seriously, quickly. ‘Fourth biggest per capita emitter’ does not market well.