

Your submission to Zero Carbon Bill

Reference no: 5204

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

Most scenarios that suggest it might be possible to limit global warming to well below 2 degrees Celsius from pre-industrial times include greenhouse gas emissions removals in the second half of this century (see the UNEP Gap Report 2017). As such, we need to aim for zero emissions by 2050 while at the same time knowing that greenhouse gas removals will likely need to be scaled up even further after 2050.

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

Net zero emissions across all greenhouse gases by 2050 will most likely require greenhouse gas removals from the atmosphere or other interventions related to short lived gases as well.

Clause

3. How should New Zealand meet its targets?

Position

Domestic emissions reductions only (including from new forest planting)

Notes

Carbon markets and putting an international price on carbon are essential elements to the global response to climate change. However, in the case of New Zealand we have adequate land and more than adequate marine areas to offset our own emissions. We should aim to sell credits not buy them (on a net basis).

Clause

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

Position

No

Notes

This is a delicate trade off. If we include provision to change the target within the Bill then it is easier to reduce ambition. If we exclude changing the target within the Bill then it would be up to a government with new legislation to change the target, which would endanger the rest of the provisions within the Zero Carbon Bill. If bipartisan support can be found for the Zero Carbon Bill then it should not be possible to change the 2050 target within the Bill.

Clause

5. 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?

Position

Yes

Notes

The five year time frame works well with our international reporting obligations, specifically our Nationally Determined Contributions to the global response to climate change and reporting to the UNFCCC Secretariat.

Clause

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

Position

Yes - each incoming Government should have the option to review the third budget in the sequence

Notes

A period of 10 to 15 years in the future is a long time horizon when it comes to politics or business (less so for infrastructure). As such, it makes sense to have flexibility in the third budget.

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

Yes

Notes

5 to 10 years is a reasonably forward looking time frame. Without flexibility there is a risk that plans will contain less ambition - hence the need for flexibility.

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

Position

Yes

Notes

One thing that appears to be missing from the considerations of the Government and Climate Change Commission is climate finance. Aligning finance with climate resilient low greenhouse gas emissions development is an aim of the Paris Agreement (highlighted in Article 2). The extent to which finance (public sector and private sector) is aligned with such development could serve as a forward looking indicator for monitoring progress. Aligning finance with zero emissions is a precondition for achieving zero emissions. In addition to this, the Government and Commission might benefit from methods emerging from the Task Force on Climate Related Financial Disclosures (TCFD) chaired by Michael Bloomberg. The TCFD looks at physical risks (related to climate hazards including knock on effects related to supply chains and liability) as well as transition risks (i.e. institutional responses related to mitigation and adaptation and how they affect stakeholders).

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

Plans will necessarily require contributions from across government. The challenge will be doing this in an effective and efficient way. A useful point of departure for any central or local government authorities would be to ask two questions: 1. "Does climate change affect any of the things we are responsible for?" If so, then adaptation options should be investigated and applied. 2. "Are any of the things we are responsible for contribute to climate change?" If so, then mitigation options should be investigated and applied. These adaptation and mitigation options can be included in plans.

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

Government needs to start with a vision each time a plan is prepared. Given the urgency and challenge climate change presents, a vision is essential to focus ambition and mobilise key stakeholders. For example, given the large proportion of greenhouse gas emissions coming from agriculture and livestock, will our vision include a world leading position in the rapidly growing market for plant based meat (and possibly dairy) substitutes or will our vision focus on raising happy animals on scenic farms providing high grade meats and quality dairy products coupled with large scale greenhouse gas removals from the atmosphere? In either the case, the vision creates the policy orientation and guides the objectives that need to be set.

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

Position

Yes

Notes

The Commission should monitor progress towards our national goals but at the same time the Zero Carbon Bill should consider whether the Commission should also monitor New Zealand's progress towards the Paris Agreement aims (Article 2). This would include: 1. the threat of climate change in the context of poverty reduction and sustainable development; 2. contributions towards efforts to limit global warming to well below 2 degrees Celsius from pre-industrial times; 3. improving resilience and ensuring food security; and, aligning climate finance with climate resilient low greenhouse gas emissions development. New Zealand is obliged to report to the UNFCCC Secretariat, progress against our Nationally Determined Contribution (NDC) to the global response to climate change (presumably our NDC will simply be a copy of our five year plan). Such reporting will assist the five yearly Global Stock-takes that are to be made under the Paris Agreement. Given the cross sectoral nature of climate change, it may be useful to consider how the reporting cycle of the Climate Change Commission would relate to other reporting cycles within New Zealand, for example reporting related to Our Living Standards Framework. The title of the Bill suggests a focus on mitigation (i.e. Zero Carbon Bill). Reporting of adaptation will be important, including proactive adaptation as well as reactive adaptation (adaptation after a climate change related hazard has impacted individuals, communities, their property or productive activities - i.e. adaptation after loss and damage). Adaptation can also be included in New Zealand's NDC related reporting to the UNFCCC.

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

Advising the Government on policy settings in the NZ ETS

Notes**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**Clause**

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

Position

Yes

Notes

The Zero Carbon Bill should include adaptation, specifically, the Bill should specify that the Climate Change Commission should monitor and report on climate change impacts, risks and related adaptation measures. This should include: 1. pro-active adaptation aimed at reducing exposure and vulnerability to climate change related hazards for example changes in coastal plans related to anticipated sea level rise; and, 2. re-active adaptation that follows climate change impacts, for example changes in infrastructure following a series of damaging storms - considered to be climate change related. Most human activities, and government policies, have mitigation and adaptation implications. As such, mitigation and adaptation should be monitored and considered together. For example how transport corridors are designed influences the type of transport and energy used and consequently the greenhouse gas emissions that will be generated. At the same time, the design of a transport corridor can either increase or decrease vulnerability and exposure to climate change related hazards. Reserving space for cycle ways will alter the transport modes used, and if that space is designed so that it crosses a flood plain, it may increase vulnerability and exposure to climate change related flooding. As such climate change plans should include adaptation as well as mitigation.

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

Position

Yes

Notes**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?

Position

Yes

Notes

This targeted adaptation reporting power will require caution. Cooperation with industry associations will be important along with local government authorities and Crown Research Institutes. Data may also be available from tax and other sources where adaptation or environment related tax deductions are made available.

Clause

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

Notes

The background documents are clear and the consultation process is much appreciated. A technical note regarding monitoring the impact of climate change: attribution of impacts is difficult. Normally thirty years of data is required to determine climate related trends. However, waiting thirty years to attribute events or damages to climate change versus normal climate variation is impractical and would not satisfy public and political demands for information on issues such as climate change loss and damage. An alternative approach could be to allocate events and damages to be climate change related using a balance of evidence approach, then after sufficient time has elapsed and data accumulated, the allocated events and damages can be attributed (on a robust statistical basis) and compared with initial allocations. For example, if a heavy precipitation event is consistent with a pattern of climate change then it might be allocated in part or full as being part of an anthropogenic climate change trend. Similarly the value of damages might also be allocated to being climate change related based on the weight of evidence. The key to this approach is to update figures once more time series data becomes available and to assess how accurate allocations appear with time (i.e. it is essential to practice allocations and get feedback).

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