10 July 2018

Dear Ministry for the Environment Zero Carbon Bill team

**A healthy Zero Carbon Act is fast, fair, firm, and founded on Te Tiriti**

As a maori doctor and a young New Zealander, I want:

- the Zero Carbon Act to **grow great health co-benefits and health equity** in NZ,
- the Climate Change Commission to include **Commissioners and staff who understand climate change health impacts and opportunities** now, and in future, from well-designed healthy climate action.

I want to work with health colleagues to:

- **help our health sector quickly reach net zero emissions**, and I expect:
  - **savings** from reduced health sector emissions **devoted to better health-care**.

**2050 target**

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

   The government should set the target in law now, with the ability to make the target stronger in response to the Commission’s early advice. The target should be based on the most up to date climate science, on our international obligations and on principles of global equity (New Zealand is a wealthy, high emitting country and should do its fair share).

   NZ (businesses, iwi, communities, whānau, households, and the health sector) need **certainty** and transparency to act fast now.

   New Zealand is a signatory to the 2015 Paris Agreement, in which all countries committed to limiting average temperature rise to well below 2°C – and to pursue efforts to limit temperature increase to 1.5°C.

   Since then, the second draft of the IPCC Special Report on Global Warming of 1.5°C finds **substantial differences in the harmful effects** of global warming limited to 1.5°C compared to 2°C above pre-industrial levels – where the 0.5°C warming difference is critical for vulnerable regions.

   Limiting global warming to **1.5°C** sensibly will require global anthropogenic CO2 emissions to reach **net-zero by 2040**, together with rapid reductions in other emissions, particularly methane.

   Within these limits, we need to distribute efforts across countries fairly.

   IPCC’s Special Report on Global Warming of 1.5°C (due this October 2018) must also guide NZ’s Zero Carbon Act.

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

   Net zero emissions across all greenhouse gases by **2040**, or earlier if the IPCC’s October 2018 report provides guidance that global emissions need to be reduced faster.

   What matters is **total net emissions** in our atmosphere and oceans – so we do not breach
crucial ecological tipping points.

The final version of the Zero Carbon Act must be decided in light of the IPCC’s Special 1.5°C report due this October.

Three of NZ’s main greenhouse gases, carbon dioxide, nitrous oxide and methane, continue to damage our climate and/or oceans for hundreds of years or more.

Keeping within the safer, healthier global warming limit of 1.5°C, sensibly, requires global anthropogenic CO2 emissions to reach net-zero by 2040, together with rapid reductions in other emissions, particularly methane. And within these limits, we need to distribute efforts across countries fairly.

3. How should New Zealand meet its targets?

**Domestic** net emissions reductions only (including from reforestation, horticultural planting and improved soil health).

International emissions units will be volatile in price – and relying on these undermines decisive domestic investment here in NZ.

Relying on international tradeable emissions units means NZ misses out on opportunities for wellbeing and equity co-benefits of reducing our domestic emissions. This means delaying the real changes for later, when they may be poorly planned and rapidly executed, with fewer co-benefits and greater likelihood for negative unintended consequences than well thought out plans starting now.

**Reforestation, horticultural planting** and improved soil health (which will absorb some of New Zealand’s carbon dioxide emissions), can be part of meeting our domestic net zero emissions target.

But our main focus must be rapidly reducing NZ’s greenhouse gas emissions – all gases, all sectors. NZ (businesses, iwi, communities, whānau, households, and all sectors including the health sector) needs certainty to act decisively now.

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

The target should only be altered to increase climate action ambition in response to updated scientific recommendations. There must be no backsliding (i.e. weakening of the target).

NZ (businesses, iwi, communities, whānau, households, and all sectors including the health sector) needs certainty to act now.

All Acts in NZ can currently be changed through due process under exceptional circumstances.

**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?

Yes

Three 5-6 year emissions budgets covering the next 18 years, with our “legislated net zero emissions by 2040 target”, gives the certainty needed for action and investment now.

Given the urgent need for global emissions to peak by 2020, the Act could also include the requirement for the Commission to urgently set an initial 2-year Emissions Budget. This 2-year Budget would fit within the first 5-6 year Emissions Budget.
6. Should the Government be able to alter the last emissions budget (ie, furthest into the future)?

The last budget should be able to be reduced if needed to respond to emerging international evidence. The Zero Carbon Act should also permit any Government to act so NZ can emit less than budgeted.

However, emissions budgets can not be increased, unless the Government changes the Act through the usual Parliamentary process.

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

The second budget should be able to be reduced if needed to respond to emerging international evidence. The Zero Carbon Act should also permit any Government to act so NZ can emit less than budgeted.

If there are exceptional circumstances, the Government can change the Zero Carbon Act, to increase the emissions budget, through the usual Parliamentary process.

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?

No

The physics of climate change comes first for setting Emissions Budgets – the bottom line is what ends up in our shared global atmosphere and oceans, and making sure ecological tipping points are not breached.

As the impacts of unmitigated climate change will be highly regressive on New Zealanders the priority must be robust emissions budgets.

The Climate Commission’s Emissions Budgets must be consistent with the best possible chance of limiting global warming to 1.5°C degrees and the greater responsibility of well-resourced nations like NZ, with Budget considerations limited to:

A. Scientific knowledge about climate change, sea level rise and ocean acidification
B. Obligations under Te Tiriti o Waitangi
C. Global leadership, including international equity

The Commission then advises the Government on mitigation policies (including Emissions Trading Scheme (ETS) settings) for the Government plans to keep NZ’s future emissions within the Commission’s budgets.

Te Tiriti O Waitangi obligations and fairness within New Zealand are top priorities for policy and planning.

Other considerations include substantial health co-benefits and technology relevant to climate change – in ensuring a fairer, just, sustainable Aotearoa-NZ.

**Government response**

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

Yes

The Zero Carbon Act must require the Government to respond by publishing plans to stay within budget as rapidly as feasible, within a set time limit that is certainly less than 12
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?

The most important issues to consider are Te Tiriti o Waitangi obligations and fairness within Aotearoa-NZ.

This means health equity is essential in planning and monitoring – all regressive policies (including ETS settings) must be effectively offset for vulnerable communities.

The substantial co-benefits to health from well-designed reduction and mitigation must be considered.

Other considerations include sustainable economic opportunities and technology relevant to climate change, to grow a fairer, just, sustainable Aotearoa-NZ.

The Government must work in Te Tiriti partnership, and with NZ’s most vulnerable communities (those already disadvantaged and those working in high-emissions industries), to create a hopeful, fairer future.

We must strive to reduce inequalities between Māori and other New Zealanders, and value the concepts of kaitiakitanga (guardianship), aroha (love/compassion), manaakitanga (caring), whakatipuranga (future generations), hauora (health and wellbeing), and tika (integrity/doing what’s right).

The direct and indirect health effects of climate change will have a greater impact on those already suffering from disadvantage and poorer health in New Zealand – children, elderly, low-income, Māori and Pacific populations, and people living with disabilities, acute or chronic illnesses.

Climate action that prioritises health equity has significant potential to reduce existing, and prevent future health inequities (e.g. retrofitting insulation to make homes warm and dry can reduce childhood asthma and chest infections – as leading causes of hospital admissions, particularly for Māori and Pacific children).

Overall, mitigation strategies must contribute to achieving equity by improving outcomes for Māori and other groups experiencing disadvantage and discrimination.

Financial costs of climate change responses can be offset by the cost-savings of health co-benefits. For example, health benefits from zero-carbon public and active transport include increased physical activity, improved social connections and more equitable access to education and employment.

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?

Yes, but also the Commission must set NZ’s Emissions Budgets – like the Reserve Bank independently sets NZ’s Official Cash Rate.

The Commission can also advise how NZ stays within these budgets, how NZ can best adapt to climate change, and monitor progress on NZ’s emissions reductions.

12. What role do you think the Climate Change Commission should have in relation to the New Zealand Emissions Trading Scheme (NZ ETS)?
The Commission should advise the Government on ETS policy settings so that New Zealand emits within budget.

The Commission must also identify the extent of regressive impacts from proposed ETS settings, and propose effective complementary policies which fairly compensate vulnerable households.

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?

Yes, but health expertise amongst Commissioners and staffing is needed too. It is also essential that the Commission is founded on partnership with tāngata whenua and upholds obligations under Te Tiriti o Waitangi.

I propose a larger pool of Climate Commissioners so that Commissioners can be called in according to the focus area – for example, adaptation policy recommendations would require the oversight of Commissioners with Tiriti and equity expertise, local government, community and adaptation experience.

In addition to climate science, I see mātauranga Māori; Te Tiriti O Waitangi, te reo me ona tikanga Māori and Māori interests as high priority essential expertise amongst Commissioners. Health expertise must also be included, and it is essential that all Commissioners have equity expertise, and that equity issues are not marginalised. Finally, I consider that expertise in achieving social change is also important.

It is important that vested interests are not part of the Commission, particularly those with a financial interest in maintaining the health-harming status quo. In health, we have seen too many crucial policy processes derailed by those who have a financial stake in continuing to do harm.

The Commissioners should be sector experts, with a high level of standing in society.

Adapting to the impacts of climate change

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

Yes

Adaptation must be a separate advisory work stream, to avoid overtaking the Commission’s top priority climate mitigation role.

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

Yes

I support the following adaptation provisions (which include the health sector):

- a national climate change risk assessment
- a national climate adaptation plan
- regular review of progress towards implementing the national adaptation plan
- an adaptation reporting plan

Mitigation and adaptation are often deeply interlinked – so often mitigation and adaptation can be addressed together in the same policy (e.g. housing). But care must be taken in designing adaptation policies to ensure that climate-damaging emissions are not increased.

Adaptation must be dealt with by a separate working group, to avoid distraction from the top priority of mitigation.
A health adaptation plan must be put in place that covers both health sector adaptation and health-protecting adaptation in other sectors.

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?
Yes
A targeted adaptation reporting power could start with voluntary reporting in the first year, and require compulsory reporting in subsequent years.

As a maori doctor and a young New Zealander, I want a Zero Carbon Act that’s fast, fair, firm and founded on Te Tiriti – with health at its heart.

**Fast** means our Zero Carbon Act fixes our NZ net zero target by 2040 in law (all sectors, all domestic emissions, plants and soil), to play our part in confidently limiting average global warming to 1.5ºC.

**Fair** means New Zealand’s Climate Change Commission considers global fairness, and creates a fairer, just and sustainable Aotearoa-NZ.

**Firm** means New Zealanders have science-based, long-term legal certainty to act.

**Tiriti-founded** means the Zero Emissions Act is founded on Te Tiriti o Waitangi partnership and values.

Because the Zero Carbon Act is an essential prescription for New Zealand’s health and wellbeing, I call for a Zero Carbon Act that’s fast, fair, firm and founded on Te Tiriti with health at its heart.

**In particular:** Not only is climate change the biggest threat to health, our environment and our culture as a country of the pacific, it is personal to me as the biggest threat to my future. I am proud to be a young New Zealander and tangatawhenua - this is our time to show strong global leadership in protecting our people and our place. Climate change is a unifying threat and I believe we are at the forefront of developing positive change into what could be a remarkable ecological future. I urge you to continue to show strong leadership in shaping this sustainable future for the health of young people and the of my future tamariki. Kia Kaha

Yours sincerely,
Grace Gillon