



Submissions form

We seek your feedback on the specific proposals in the Zero Carbon Bill.

Either email this submission to ZCB.Submissions@mfe.govt.nz (Microsoft Word document (2003 or later) or PDF) or post to Ministry for the Environment, PO Box 10362, Wellington, 6143.

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Personal / organisation details

You must provide either a company name or given name(s)

Company name _____

Given names Jan (Johannes Thaddeus Franciscus)

Surname Heijs

Contact person _____

Address _____

Submitter type, pick one:

- Individual
- NGO
- Business / Industry
- Local Government
- Central Government
- Iwi / Māori
- University
- Research Institute
- School
- Community Group
- Unspecified / Other

My summary

As the submission form didn't provide space for this I do want to add to the standard questions and summarise my key points

- **I fully support the need for this Bill.**
- **I suggest the sense of urgency needs to be strengthened. Any doubt or uncertainty needs to be avoided.**
- **We need to set a target for 2050, including all gasses**
- **Emissions budgets are an appropriate tool to set to pathway to achieve the 2050 target**
- **Adaption needs to be included in the bill (and more specific)**
- **The climate change commission needs to have teeth not just have an advisory role.**
- **There needs to be more certainty in the bill to ensure budgets are met and plans are actually implemented. These need to include accountabilities and consequences when not meeting budgets and the target.**
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My personal story:

I live in Mapua. Near where I live we have experience the consequences of climate change from a few cyclones earlier this year. **I also work in water management.**

Both my experiences have demonstrated that local councils struggle to grapple with how to deal with adaption. Some cases where councils have tried to protect properties against sea levels have failed (eg KCDC).

Every council is (often reluctantly) developing their own responses **with very little direction** from central government. And if they do, every individual council needs to work its way through lengthy and expensive processes and legal challenges. This is very ineffective and has uncertain outcomes. This is an example where a national policy statement could assist councils in their adaptations plans.

Central Government has to show leadership, not shy away from bold decision and The Bill and subsequent implementation plans should provide clear direction and have a high level of compulsion.

Verbal submission

Although there is no space in the form to indicate desire to make verbal submissions, I would like to if that is possible.

2050 target

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

Pick one:

- the Government sets a 2050 target in legislation now
- ~~the Government sets a goal to reach net zero emissions by the second half of the century, and the Climate Change Commission advises on the specific target for the Government to set later.~~

The only 2 reasons to make changes are:

1. **faster or more reduction** (so better – not taking longer or relaxing target) – certainly when new research demonstrated this is required to stay below the 1.5 degrees warming.
2. change as result of **revised international agreements** backed by science (IPCC) and/or revised forecasts by the IPCC

I am also concerned that the bill excludes international travel (people and goods). Although I understand other international organisations are developing their own approaches, I do recommend that as a minimum **our contribution in international travel gets monitored** and if these international organisation don't deliver, **the shortfall in our share is to be included**. This also provides an incentive for our government to send the right signals to these organisations.

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

Pick one:

- ~~net zero carbon dioxide: Reducing net carbon dioxide emissions to zero by 2050~~
- ~~net zero long-lived gases and stabilised short-lived gases: Long-lived gases to net zero by 2050, while also stabilising short-lived gases~~
- net zero emissions: Net zero emissions across all greenhouse gases by 2050.**

This is a **no-brainer**. All these gasses contribute to global warming. Although short term gasses disappear after decades, **they do contribute now and are aggressive** as I understand.

I do support a 2-basket approach where budgets can differ and the also the ways to achieve these.

3. How should New Zealand meet its targets?

Pick one:

- domestic emissions reductions only (including from new forest planting)
- ~~domestic emissions reductions (including from new forest planting) and using some emissions reductions from overseas (international carbon units) that have strong environmental safeguards.~~

I'm very hesitant to allow the use of overseas credits, despite some suggested safeguards, because

- **uncertainty** these safeguards are effective
- assume that countries selling these also must meet the reduction targets / are expected to honour the Paris agreement or better. Selling the credits might be counterproductive for them

A **precautionary approach** is appropriate given the many uncertainties around the causes and effects of climate change. Predictions continue to get more worrying.

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

Pick one:

- Yes
- no.

A **"No-but"** as also recommended in my response to question 1 - Only possible changes are:

1. **faster or more reduction** (so better – not taking longer or relaxing target) – certainly when new research demonstrated this is required to stay below the 1.5 degrees warming.
2. change as result of **revised international agreements** backed by science (IPCC) or based on new prediction by the IPCC.

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?

Pick one:

- yes
- no.

I generally agree with **the 5 years as a maximum and allow for sooner** e.g. to allow to improve plans in response to new research findings so avoid better alternatives to be dismissed for up to 5 years.

6. 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
- ~~yes, the third emissions budget should be able to be changed, but only when the subsequent budget is set~~
- ~~no, emissions budgets should not be able to be changed.~~

Yes, but only on certain conditions (if not then my preference is be NO)

The possibility to change can be too tempting e.g in time of economic stress: because of short term thinking.

Condition could include:

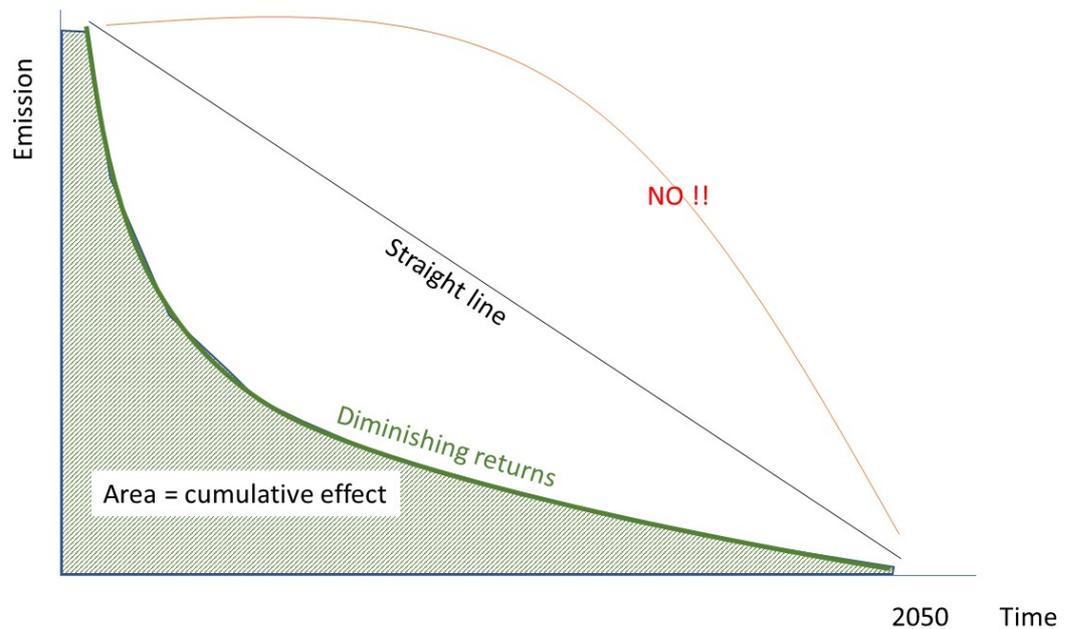
- Provide (more) **certainty** that 2050 target can realistically be met or be met sooner
- **Motivated by science** (not politically or economically motivated / pushed by lobby groups.
- The **Commission** would need to **fully support** the change

In addition I want the setting of the budget to consider

- a) The two basket approach
- b) The law of diminishing returns (or 80%/20% rule)

- c) The fact that for long term gasses (CO2) we are talking about cumulative effects
- d) That reductions achieved early on will help the ultimate target (temperature rise) to stay below 2%

To illustrate the above thinking see figure below



- ✓ We need to aim at the low hanging fruit /best bang for buck. So biggest increases at the start
- ✓ It is always getting harder at the end
- ✓ Certainly for long term gasses it is the area under the curve that will determine the effect (warming). So green curve will render a much better effect then the straight line
- ✓ For short term gasses which are 100-ish time more damaging – this curve will also achieve the best result, even if they last 'only' decades.

7. 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.

I can't think of any exceptional circumstances that would override the need to combat climate change. Climate change is the most exceptional circumstance to warrant continuing this path no matter what.

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?

Pick one:

yes

~~no~~

Yes, but **only on “how-to”** achieve the target and budgets, not changing the target and budgets.

I agree that the Government and the Climate Commission should take the following factors into consideration when advising on and setting budgets:

- scientific knowledge regarding climate change
- technology relevant to climate change
- economic circumstances and the likely impact of a decision on the economy, as well as the competitiveness of particular sectors of the economy
- fiscal circumstances and the likely impact of the decision on taxation, public spending and public borrowing
- social circumstances and the likely impact of a decision on fuel poverty
- energy policy and the likely impact of a decision on energy supplies and the carbon and energy intensity of the economy.

Government response

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

Pick one:

yes

~~no~~

I assume you are talking about the time between Commission advise and publishing a plan. I consider the timeframes suggested are too long. Plans can be developed alongside other process (when these are transparent). I recommend a **maximum of 3 months** to set out a plan.

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?

Just a publishing plan without specifying what the plan should contain is inadequate. The plan needs to include a **specific implementation plan** with **actors, responsibilities, budgets and timelines**.

An issues that is important is that these are not favouring certain industry sectors, are science based and that the most effective mitigation methods should have priority. Any 'pain' needs to be addresses BUT NOT by leaving some players 'off-the-hook'.

In addition, there need to be **accountabilities and consequences** what plans are not achieved. I suggest clear liability and penalties to be included in the bill for not achieving results. I.e. a government should be able to be taken to court when not delivering.

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?

Pick one:

yes

no.

I don't have enough confidence that all future governments will follow "just" advice from the commission. We have seen too many examples where advice e.g. from the Parliamentary Commissioner for the Environment has not been followed.

The statement that the community can make their judgement known in the election cycle is unrealistic because elections are thus far driven by short term promises and environment has never been the top priority during election time.

I can see a balance where **some recommendation can have an advisory status while other won't in which the commission decides**. This needs more thinking. Hard wiring meeting the budgets and no escape excuses need to be included!

In addition, the commission needs to be **adequately resourced** including (not sure where else I can make this comment:

- Budgets to carry out the work
- Access to MfE resources
- Ability to initiate their own research or commission peer review

The Bill needs to require that the government makes these resources available.

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

Pick one:

- ~~advising the Government on policy settings in the NZ ETS~~
- makes decisions itself, in respect of the number of units available in the NZ ETS.

The risk of the NZ ETS becoming politicized is simply too big.

Also, **the reliance on ‘the market’ using the ETS is questionable.** In other sectors (such as housing) it has been clear that relying (only) on the market has not worked. Carbon budgets and the introduction of carbon-taxes are other alternatives.

I suggest we state **“NZ ETS or alternative methods”**. I note that the ETS has been seen to be ineffective. Also, we cannot rule out that better methods become available in the next 30+ years.

I personally favour a Carbon-Tax. I find it strange that this is not mentioned in the document. Revenue collected through a carbon tax can be recycled to offset ‘pain’ by community / industry sectors. **The bill should be open minded as to what financial instruments can be employed to achieve the greatest success (change behaviour and practices).**

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?

Pick one:

- Yes, plus
- ~~no.~~

Additional expertise to be included:

- Biodiversity
- Bio security
- Social science
- Public Health (incl the effects of global warming on public health)
- International climate change (IPCC – link: eg Dr Rob Bell)
- Climate change adaptation

Adapting to the impacts of climate change

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

Pick one:

yes

no

YES I STRONGLY SUPPORT THAT ADOPTION IS INCLUDED

We need to adapt to climate change as well described in the document. There is however little substance in the document compared to the rest. It feels that the thinking around adaption hasn't been well developed. Most of the suggestions sound weak.

The Bill needs to be specific as to what all stakeholders are required to do with respect to adapting to climate change. Also here we need targets and an implementation plan (see previous submission points) are part of this.

As an example, the statement "The Bill could require the Government to develop national adaptation plans that prioritise actions based on regular risk assessments" suggest a more optional approach.

The Bill and the implementation plans need to clearly specify who needs to do what and by when

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Every council is (often reluctantly) developing their own responses **with very little direction** from central government. And if they do, every individual council needs to work its way through lengthy and expensive processes and legal challenges. This is very ineffective and has uncertain outcomes. This is an example where a national policy statement could assist councils in their adaptations plans.

The Bill and subsequent implementation plans should provide clear direction and have a high level of compulsion

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

Pick one:

Yes, but

no.

I agree with the suggested tools including “A national climate Change Risk Assessment”, “The National adaption plan” and “National adaption reporting power”.

I suggest that:

the full commission is responsible for both mitigation and adoption

That under the commission two subgroups be established, one for mitigation and one for adoptions recognising that skill sets needed to undertake the work are different

That the structure to deliver (targets, budgets, responsibilities) are as similar as possible

To keep it simple I suggest the **same approach is taken as in relation to the roles of government and commission**; not another group/organisation

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?

Pick one:

Yes, but

~~no.~~

Yes, but I recommend bringing this under **the responsibility of the Commission** not a separate group/organisation

See comments made under 15 above