

**Subject:** Submission

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## 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](mailto: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 Linda Mary

Surname Cowan

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

### 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.

**Optional comment**

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.

**Optional comment**

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.

**Optional comment**

The New Zealand net zero carbon target should be met by domestic reductions only. However New Zealand has international responsibilities and should be supporting and assisting in mitigation and adaptation in developing countries through mechanisms such as additional aid or perhaps purchasing carbon credits.

Emphasis should be placed on reducing fossil fuel based emissions as soon as possible. The Zero Carbon Act should also provide a framework for transparency and accountability around New Zealand's international climate finance.

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

Pick one:

yes

no.

**Optional comment**

The 2050 target should not be altered in response to "economic changes" as this undermines its long-term certainty. However, the ability to revise the 2050 target to be more ambitious, in light of major changes in scientific understanding or international agreements should be permitted.

## 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.

**Optional comment**

I agree with 5-year budgets set 10-15 years in advance, so that three are in effect at all times.

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.

**Optional comment**

Emissions budgets should not be altered in response to "economic changes" as this undermines their long-term certainty. However, the ability to revise the 2050 target to be more ambitious, in light of major changes in scientific understanding or international agreements should be permitted.

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.

**Optional comment**

Emissions budgets should not be altered in response to "economic changes" as this undermines their long-term certainty. However, the ability to revise the 2050 target to be more ambitious, in light of major changes in scientific understanding or international agreements should be permitted.

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.

**Optional comment**

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

We also need to consider our obligations under Te Tiriti o Waitangi as well as Fairness (intergenerational justice and a just transition), cost-effectiveness, comprehensiveness and environmental sustainability.

## 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.

**Optional comment**

We must learn from the mistakes of the UK's Climate Change Act and specify a strict time frame for producing 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?

**Comment**

The Government's policy plans to meet emission budgets should be comprehensive, fair, cost-effective, environmentally sustainable, and reflect a commitment to Te Tiriti o Waitangi.

In setting plans to meet the emissions budgets, the government should be:

- consulting and working with Local Government to encourage them to mitigate and adapt to climate change
- considering the relative consumption emissions and other environmental impacts when weighing up

mitigation and adaptation measures e.g. the emissions cost of producing electric cars overseas

- considering the impact of its adaption and mitigation measures on other planetary boundaries i.e. biodiversity, nutrient pollution.
- taking into account New Zealand's contribution to international aviation and maritime emissions.
- making sure they're based on the best science available
- ensuring that they deliver fair outcomes for Kiwis
- reflecting the principle of a Just Transition for workers
- honouring Te Tiriti o Waitangi
- being environmentally sustainable, especially for New Zealand's unique native plants and animals
- maximising the impact of money spent and being cost-effective
- encouraging innovation
- unlocking economic opportunities for New Zealanders, such as in renewable energy
- honouring our international commitments, including under the Paris Agreement
- consulting people who may be economically affected, like farmers or businesses
- consulting tangata whenua
- consulting communities already facing the physical impacts of climate change

## 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.

### Optional comment

I believe that the Commission should not be a decision-making body. I support the Climate Commission having two functions 1. Providing expert advice and 2. Monitoring our progress and holding the government account.

It should not be a decision-making body as it would lead to a lack of democratic accountability, it becoming a comprised watch dog and that it would not have the ability to implement comprehensive policy plans.

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.

### Optional comment

The Commission should advise the Government on policy settings in the NZ ETS. It should not make decisions itself with respect to the number of units available in the NZ ETS, or its implementation.

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

no.

### Optional comment

I agree with the following collective expertise:

- climate change policy (including emissions trading)
- resource economics and impacts (including social impacts, labour markets and distribution)
- te Tiriti o Waitangi, te reo me ona tikanga Māori and Māori

interests

- climate and environmental science including mātauranga Māori
  - experience with addressing adaptation challenges like planning, insurance and local government
  - risk management
  - engineering and/or infrastructure
  - community engagement and communications.
  - business competitiveness
  - knowledge of the public and private innovation and technology development system.
- I also think expertise in public health is also important.

## 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

### Optional comment

This may require a separate adaptation sub-committee within the Climate Commission.

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

no.

### Optional comment

I agree with the proposed functions below:

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

Care will need to be taken in managing the interaction between national and local government roles.

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

no.

### Optional comment

Yes. This would let the government and the public know about the risks to public and other infrastructure, and make these organisations better informed about the risks they face.

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

### Optional comment