**Submission on Zero Carbon Bill**

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## 2050 target

***Q1. What process should the Government use to set a new emissions reduction target in legislation?***

- ***the Government sets a 2050 target in legislation now***

We need to get on with it and set a target now so emitters know they have to comply and there is no more wiggle room.
However it is important to note that setting a target, and even budgets, does not reduce a single tonne of carbon. It just provides a framework within which policies can sit. There needs to be an action plan associated with each Budget, with time frames and actions. For example, regulatory measures for efficiency of products and especially vehicles;

***Q2. If the Government sets a 2050 target now, which is the best target for New Zealand?***

- ***net zero long-lived gases and stabilised short-lived gases: Long-lived gases to net zero by 2050, while also stabilising short-lived gases***

These options have created a lot of confusion as options 2 and 3 are not alternatives. I support the fastest possible reduction of all emissions, but methane does not have to go to zero so I support a two basket approach, provided that methane initially drops steeply..

Net zero by 2050 would have been OK if we had started earlier, but it has been left so late that we probably have to go to net-negative, or at least net zero by 2040.

**The most important point I want to make is that it is cumulative emissions that count, not the date by which we reach zero.** This would best be expressed in a simple line graph but my computer skills aren't up to that. Imagine a line from today's total emissions to zero in 2050. It is the total area under the curve that matters – ie the gradient of the curve. If the line is straight, 2050 is probably too late. If it is convex, with reductions only gradually increasing and the major effort occurring after another decade, it is most certainly too late and the end point should be 2030 or 2040. If the line is concave, with major reductions happening over the next 5-10 years, we might still aim at 2050. this should be dealt with properly in the carbon budgets.

**How soon we start, and how fast we cut over the next ten years, is crucial.**

Some of us have been arguing this for at least 2 decades. No-one can predict the political situation in 10, 20, 30 years' time – our window of opportunity is now, and we must plan very significant reductions over the next ten years.

If we do not adopt the two-basket approach farmers will rightly say, we have ignored the science. They know that methane decays much faster than long lived gases. It is vital that we bring farming organisations on board, not by subsidies or special treatment, but by recognising that today's methane will not be around forever (while reminding them that it is NOT the same for nitrous oxide.)

I have tried to find a scientific way of working out at what level methane should be stabilised but there isn't one – it is a political judgement. However we have so far overshot the capacity of the atmosphere that it must be significantly lower than today's level. It cannot be the 1990 level as advocated by Federated Farmers, which is only 5% lower than today's. The Discussion document refers to the NZIER work which modeled a 55% reduction in methane, then stabilisation. I have seen no justification for this number, but it sounds reasonable. The Commission should be asked to investigate what lies behind the NZIER proposal, then to set a level at which methane should be stabilised, by when, and to justify their choice.
Significant reduction in radiative forcing can be achieved by rapid and steep reduction in methane before stabilisation, and as farmers have not been required to take any burden under the ETS to date, it is not unreasonable.

An idea circulating recently which I believe has merit is to allow purchase of short term forestry credits from rotational pine forestry only to offset short term emissions, ie methane, requiring CO2 and nitrous oxide emissions to be offset with long term sequestration, ie permanent forests. As a side effect, this will change the pattern of forest planting with associate biodiversity benefits. The Commission should be required to report on this.

### *Q3. How should New Zealand meet its targets?*

- ⑩ ***domestic emissions reductions only (including from new forest planting)***

We have heard all about environmentally credible ERUs before but they generally turn out not to be. NZ should not have to rely on the rest of the world to reduce our emissions for us. The expectation should be that we achieve most  of our target by actually reducing emissions, with offsets only used to make up the balance. We are a privileged country – high income, low population density, a benign climate (so far); a lot of scope for improved energy efficiency and shifting from coal and gas to wood waste; a highly inefficient motor vehicle fleet which could be improved significantly within a decade; a lot of renewable electricity, with a reasonably good solar resource and excellent wind resource; and technologically literate. If we buy any credible international units we can find, what are less fortunate countries to do?

Should  some catastrophe befall NZ international credits will be there for emergencies. However I am doubtful where they will come from, with demand likely to greatly exceed supply.

***Q4. Should the Zero Carbon Bill allow the 2050 target to be revised if circumstances change?***

***No***

I presume this means changed by executive action. Absolutely not. There will be pressure on future governments to water down our ambition, especially if we are slow to make progress. We don't want to set up a "get out of jail free" card at this stage. If some event requires a change in the target, governments can always legislate, but to change the Act would require recourse to Parliament and thorough debate – and so it should. I am recommending here a number of options that require future action to go through the Parliament of the day. This transparency is vital if we are to avoid special pleading and taking the easy way out.

## Emissions budgets

***Q5. 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***

***Q6. Should the Government be able to alter the last emissions budget (ie, furthest into the future)?***

- ***yes, the third emissions budget should be able to be changed, but only when the subsequent budget is set and provided that any delay in reaching targets or budgets is made up.***

The changes should go through Parliament so all the arguments are laid out for the public to see and comment on.

***Q7. Should the Government have the ability to review and adjust the second emissions budget within a specific range under exceptional circumstances?***

***No***

Governments alway have the power to legislate and if there are special circumstances this is what they should do.

***Q8. 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?***

***Yes***

## Government response

***Q9. Should the Zero Carbon Bill require Governments to set out plans within a certain timeframe to achieve the emissions budgets?***

**Yes. This is vital or the Budgets will be useless.**

**The action plans should be tabled in Parliament and widely debated. They should make clear who has responsibility to act, by when so there is accountability.**

***Q10. 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?***

We cannot rely just on a price arrived at via emissions trading. We need regulatory measures such as standards. Vehicles are a stand out example.

Work with iwi to ensure Treaty justice. Ensure low carbon measures do not compromise biodiversity, human rights.

## Climate Change Commission

***Q11. 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***

***Q12. What role do you think the Climate Change Commission should have in relation to the New Zealand Emissions Trading Scheme (NZ ETS)?***

- ***advising the Government on policy settings in the NZ ETS***

The Commission should not make final decisions because it is unelected and unaccountable. However if/when Government does not take the Commission's advice, it should report its reasons to Parliament within a stated timeframe. Transparency is vital.

***Q13. 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 – the list seems very light on climate science which should be strengthened. Impacts on the climate are in the end more important than impacts on the economy.

## Adapting to the impacts of climate change

***Q14. Do you think the Zero Carbon Bill should cover adapting to climate change?***

***Yes***

***Q15. The Government has proposed a number of new functions to help us adapt to climate change. Do you agree with the proposed functions?*** ***Yes***

It should  be mandatory for councils to publicise information about climate risk locally – eg flooding risk for particular properties on the LIM.

***Q16. 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***