

Your submission to Zero Carbon Bill

Bill Allan, **Bill Allan**

Reference no: 9790

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

I strongly support the immediate creation of a Zero Carbon Act. The 2050 target must be set in legislation as soon as possible, as time is very short. It is urgent that a strong Climate Commission is set up to reduce NZ's emissions to meet targets set by the Paris Accord. Business as Usual will mean the 1.5C target will be exceeded in 2 to 3 years and the 2C target in 16 to 17 years.

Clause

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

Position

Net Zero Long-Lived Gases and Stabilised Short-Lived Gases - Long-lived gases to net zero by 2050 while also stabilising short-lived gases

Notes

The options set out in the discussion document are inadequate as they do not address the risk posed by increasing levels of methane identified by recent scientific research. It is essential that NZ's relatively high methane emissions are reduced as well as CO2 emissions. The gases are very different and will require different approaches that should be developed by a scientifically literate Climate Commission.

Clause

3. How should New Zealand meet its targets?

Position

Domestic emissions reductions only (including from new forest planting)

Notes

The NZ ETS system has been woefully inadequate in producing emissions reductions. In fact it appears to have led to emissions increasing. Replacement by a "feebate" scheme is required - high emitters should pay heavy fees to be passed on to zero or low emitters. New forest planting can be a temporary measure only. Ideally there should be a gross emissions target including decarbonization of electricity, energy and transport systems (closure of Tiwai Point smelter would achieve this instantly). Methane emissions should be reduced to much lower levels than at present, though not necessarily to zero.

Clause

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

Position

Yes

Notes

Revision should be in the direction of stricter controls rather than relaxing goals, unless the circumstances are in some way disastrous - the certain worsening of climate change will be the real disaster.

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

Will the Climate Change Commission determine budgets and strongly recommend them to the Government?

Clause

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

Position

Yes - the third emissions budget should be able to be changed but only when the subsequent budget is set

Notes

Changes in budgets should always be in the direction of stronger emission controls.

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

Again there should be extreme caution about whether emission reduction targets are being weakened.

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

However, again there should be extreme caution about whether "economic and fiscal" factors are being used as an excuse to carry on with something close to "Business as Usual".

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 should be developed with strong input from the independent Climate Change Commission.

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

It is critical that the government follows the best science advice available and keeps reviewing policies as the science develops. Separate methodologies must be used for each of the greenhouse gases, CO₂, CH₄ and N₂O. It is very important to follow progress in other countries. The current Paris Accord pledges do not meet the RCP 2.6 target and will need to be increased. Current research shows that increases in methane concentration have not been taken into account in the data used for the Paris Accord and that RCP 2.6 will have to be urgently revised. This has huge implications for NZ with its Greenhouse Gas emissions profile heavily weighted by methane.

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

Extremely important that the Climate Change Commission is effective in advising on and monitoring NZ's progress towards its goals, using the best available data from a scientifically established and trustworthy monitoring programme.

Clause

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

Notes

As discussed in section 3, the current ETS has been totally ineffective in reducing Greenhouse Gas emissions, particularly through purchase of "junk" overseas units. A "feebate" scheme would recover credibility so far totally lost by the current ETS. If this scheme is not used, a completely transparent ETS would have to be established covering all aspects of NZ industry and agriculture. The Climate Change Commission could investigate whether the ETS should exist at all.

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

I give qualified agreement here. There should be more emphasis on scientific and engineering expertise from those who understand technical aspects of Climate Change issues.

Clause

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

Position

No

Notes

The Zero Carbon Act when passed into law must be about following the extremely urgent pathways required to meet and most likely exceed pledges made for the Paris Accord, using best practice science strictly monitored by the Climate Change Commission. Adapting to climate change is an important topic, but should be handled by other advisory groups set up for this specific purpose. Central government should be responsible for setting up these groups to provide a nationwide set of plans, but this should not be a responsibility of the Climate Change Commission.

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

As discussed in section 14, these functions should not be a responsibility of the Climate Change Commission.

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

Again, this is required, but should not be a responsibility of the Climate Change Commission.

Clause

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

Notes

The Productivity Commission's report (April 2018) on "A Low Emissions Economy" is a very important, detailed and comprehensive document that should be consulted for many aspects of the Zero Carbon Bill.