

# SUBMISSION TO THE MINISTRY FOR THE ENVIRONMENT ON THE ZERO CARBON BILL

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## SUBMISSION

### Long-Term Target

- I support the most ambitious target presented in the consultation paper - of **reducing total greenhouse gas emissions in New Zealand to net zero by 2050**. If this is deemed too ambitious, **short-lived gases, from agriculture, should be brought down to sustainable levels**, with short lived gases from the fossil fuels sector brought to zero.
- Given scientific warnings of the urgency of the climate crisis, I feel strongly that **urgent reductions should take place well before 2050**, as it is the reductions pathway not the end date that is of most significance to our country's emissions. I will support a target date of 2050 only if the Bill emphasises that the reductions pathway should be fast within the first decade.
- I do **not support the Bill allowing the Government to change the target date by pushing it further away**, on the justification of "economic change".
- I strongly support taking a science-based approach to reducing emissions as rapidly and effectively as possible, so that:
  - We aim for **negative levels of long-lived gases (eg carbon dioxide, nitrous oxide and fossil methane)**,
  - We **reduce short-lived gases (eg biological methane) to sustainable levels as fast and as much as possible**. The more and sooner we reduce methane, the fewer emissions we will have to deal with in the future, when reduction will be harder.

### The Climate Commission

- I support the **establishment of an independent Climate Commission** that is made up of experts and **provides advice, but does not make final decisions**.
- I agree the **Commission should set 5-year budgets** as described, and that these may not be changed by the Government.
- I agree that while the Commission should advise on the nature of an effective **carbon tax** or similar, it is the **role of government to implement such mechanisms**.
- I agree that the Commission should **be advised by a wide range of experts**, We believe it should also have **effective processes to get feedback**

**from all parts of society**, including Maori and Pacific communities, low income groups, people with disabilities and other groups for whom access to public policymaking can be difficult.

## **NZ ETS/Carbon tax**

- Although not the subject of this consultation, we strongly **support the urgent introduction of an effective carbon tax** or similar mechanism to change the incentives on organisations, businesses and individuals to move to low carbon alternatives. I support the Commission working on this as soon as possible.
- New Zealand is already a decade behind other countries that brought in similar Commissions and are well forward on the path to a low carbon economy.

## **Adaptation**

- I **support a plan for adaptation** being included in the Zero Carbon Act.
- I support such a plan being shared with local authorities and other organisations.

## **How the Government should plan to meet the 5-year budgets**

- The Government's plans to meet the 5-year emission budgets should meet all the usual criteria for good public policy (fair, transparent, evidence-based, inclusive etc).
- They should also **take explicit consideration** of:
  - The **scientific evidence of the sharp urgency** of the climate crisis
  - The need to include all aspects of society and the economy and to ensure that any proposed changes are **fair and just and do not fall disproportionately on the least advantaged**
  - The **urgent need to move away from the current 'endless growth' model** for the economy and to foster an economic and social structure that is environmentally sustainable for future generations, as well as fair and equitable so that all citizens will support it.
- The Zero Carbon Act must be just and fair in that it honours Te Tiriti o Waitangi; ensures a just transition for workers and communities; and avoids passing on the costs to future generations.

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

The Government should set an interim and a final target for several dates in legislation now (i.e set a fast emissions reductions pathway)- rather than just one final date i.e. 2050. Climate scientists are saying to us clearly that a target of zero carbon by 2050 is far too late to avert expected global warming.

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

I support taking a science-based approach to ensure our efforts to reduce emissions are as impactful as possible: we should aim for negative levels of long-lived gases, while reducing short-lived gases to sustainable low levels as fast as possible..

**Q3. How should New Zealand meet its targets? By using domestic emissions reductions only (including from new forest planting).**

I do not support any scheme that aims to reach “zero carbon” by off-setting NZ’s domestic emissions through the purchase of carbon credits from other countries. We need real greenhouse gas emission in NZ as everywhere else, not another financial speculation scheme.

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

The Bill should allow the target date to be revised to bring it forward but not to push it further out. To push it further out in response to “economic changes” will undermines its long-term certainty and usefulness for guiding business. But to allow it to be brought forward will reflect the scientific consensus on the urgency of the situation.

**Q5. 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?**

Yes - I agree with 5-year budgets

**Q6 - Q7. Should the Government be able to alter emissions budgets?**

No - emissions budgets should not be altered in response to “economic changes” as this undermines their long-term certainty. However, the ability to revise budgets in light of major changes in scientific understanding or international agreements should be permitted.

**Q8. Do you agree with the proposed considerations that the Government and the Climate Commission will need to take into account when advising on and setting budgets?**

I support the Government and the Climate Commission taking the following factors into consideration when advising on and setting budgets:

- Scientific knowledge regarding climate change (his is the most important factor)
- Technology relevant to climate change
- Economic circumstances and the likely impact of a decision on the economy considered in its broadest sense, not just the current free-market or financial system,
- Social justice and the need for a fair and just transition to a low carbon economy, so that people on low incomes are not disadvantaged by the changes.
- Fiscal circumstances and the likely impact of the decision on taxation, public spending and public borrowing, with consideration of the long-term goal of moving to an economy that is sustainable within resource and environmental constraints and that is not based on the assumption of continual and destructive ‘economic growth’.
- Energy policy and the likely impact of a decision on energy supplies and the carbon and energy intensity of the economy.

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

Yes – New Zealand must learn from the mistakes of the UK's Climate Change Act and specify a strict timeframe for producing a plan.

**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?**

- 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. They should include consideration of:
  - The sharp urgency of the current climate crisis
  - The need to include all aspects of society and the economy
  - The urgent need to move away from the 'endless growth' model for the economy and to support economic and social structures that are environmentally sustainable for future generations, as well as fair and equitable so that all citizens will support it.

**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 - the Commission should not be a decision-making body. If it is just advisory, the Commission is likely to be retained by any incoming government who may ignore its recommendations (like the Commissioner for the Environment). But if it is a decision-making body, it may be legislated away by a new government that does not like its recommendations. I support any compromise that maintains the Commission as independent and non-partisan but with enough teeth to be taken seriously by Government.

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

- I support the introduction of a carbon tax rather than maintenance of the current NZ ETS and would hope that the Commission will recommend the most effective form of such a tax.
- Whatever mechanism is chosen to put a price on carbon, I support the Commission making recommendations for this mechanism but the implementation of such a mechanism should be the responsibility of the Government.

**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?**

We agree with the following collective expertise:

- Climate change policy (including carbon tax/emissions trading)
- Resource economics and impacts (including social impacts, impact on socio-economic equity and ways of achieving a fair and just transition)
- 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.

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

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

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

I agree with the proposed functions below, but feel it is important that local authorities and community and sector groups have a say in how this is done:

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

**Q16. Should the Government explore setting up a targeted adaptation reporting power that could see some organisations share information on their exposure to climate change risks?**

Yes