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 John

Surname Whittaker

Contact person

Address

Submitter type, pick one:
• Individual

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.
   
   Optional comment
   The IPCC was formed 30 years ago, yet NZ emissions continue to rise. We must not waste further time setting a target.

2. If the Government sets a 2050 target now, which is the best target for New Zealand? 
   Pick one:
   • net zero emissions: Net zero emissions across all greenhouse gases by 2050.
   
   Optional comment
   A target to stabilize methane emissions by 2050 would fail to drive any meaningful reduction. Thirty years is enough time to fund research (such as that done by the Pastoral and Greenhouse Gas Research Consortium) and develop new technology, whilst more immediate gains are made where technology already exists.

3. How should New Zealand meet its targets? 
   Pick one:
   • domestic emissions reductions only (including from new forest planting)
   
   Optional comment
   We need to use this as an opportunity to drive innovation and our own economy, not drive innovation in overseas carbon credit rorts, as has happened before.
   The government should instead lobby the international community for trade rules that advantage low emissions manufacturing and agriculture exports.

4. Should the Zero Carbon Bill allow the 2050 target to be revised if circumstances change? 
   Pick one:
   • yes
   
   Optional comment
   The bill should only permit a change in target on the basis of scientific evidence or meeting international commitments (such as the tightening clause under the Paris agreement).
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

Optional comment

Agree with the proposal, so long as there is annual reporting of emissions and annual allocation of ETS units. We cannot wait five years between opportunities to take corrective action.

Suggest that a target for total net emissions through to 2050 is also set and budgets are taken out of that target figure, since total emissions are what matters. Doing so will encourage front-loading emissions reductions as this will have a bigger effect on total emissions.

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

Pick one:

• yes, the third emissions budget should be able to be changed, but only when the subsequent budget is set

Optional comment

At the time the budget is set the climate change commission should be required to report out predicted carbon unit costs under the ETS through to 2050. This will clarify the long-term costs of deferring action.

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

Pick one:

• no.

Optional comment

During consultation on the ETS businesses called for certainty to allow them to plan their investment decisions. A ten year horizon will provide that, a five year will not, instead it will encourage the wait-and-see (or a wait-and-lobby) approach we’ve seen to date with the ETS.

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
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

Optional comment
This must absolutely happen, it’s been completely missing to date. Instead we’ve relied on an ETS that was rendered ineffective through exemptions, 2-for-1s and junk international credits.
In addition the climate commission should be required to report on the expected emissions reductions from proposed government plans, to provide the checks and balances historically missing for the ETS.

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
Taking effective, rapid and sustained action is the most important issue. To that end the government must first and foremost take an evidence based, science led approach when planning action.
The government need to work primarily with the people of New Zealand to realize the societal benefits and minimise the negative impacts of the transition.

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

Optional comment
Governments worldwide have been advised by the IPCC for some thirty years now, yet we’ve had thirty years of rising emissions. The commission needs teeth.

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:

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makes decisions itself, in respect of the number of units available in the NZ ETS.

**Optional comment**
The reserve bank is responsible for keeping inflation rates within a given range, given economic levers to adjust (such as interest rates). The commission should have a similar role regarding greenhouse emissions. As well as unit availability the commission should also have control over the minimum auction price for ETS units. As with the reserve bank the commission should be able to request further controls, for example control of a zero/low emission vehicle “Freebate”.

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

**Optional comment**

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

Pick one:

• yes

**Optional comment**
The bill needs to require that local councils assess climate risk to property and add this to LIMs.

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

**Optional comment**

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
Optional comment