

Your submission to Zero Carbon Bill

Reference no: 10819

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 support the concept of setting a 2050 target in legislation now. Emissions targets need stability to have a hope of succeeding, and I think it is helpful if a future Government wanting to change the target is required to go through a robust, democratic process of legislative amendment. It does, however, mean that it is very important that this target is in line with the degree of ambition that recent and emerging science says is necessary if we are to have a hope of a safe climate future (see further discussion below).

Clause

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

Position

Net Zero Emissions - Net zero emissions across all greenhouse gases by 2050

Notes

I support reducing total greenhouse gases to net zero, however I would like the Government to give serious consideration to achieving net neutrality by 2040, rather than 2050 as currently proposed by the Government. It is clear from recent and emerging research that limiting warming to 2 degrees above pre-industrial levels is likely to be inadequate to avoid "runaway" climate change, and that international commitments will need to be revised to be more ambitious. In New Zealand, we have been (and remain) a relatively higher per capita emitter, so in the interest of a fair and just global transition, New Zealand's emissions cuts should rightly be proportionately more ambitious than other nations which have historically been responsible for proportionately fewer emissions per capita. I am a strong believer that the co-benefits of climate change mitigation efforts will have positive effects for wellbeing of far more value to the New Zealand public than any of the forgone economic gains, and I think the benefits touched on in the document are just the tip of the iceberg in this regard. However, even in a purely economic sense, the Stern Review and subsequent similar analyses have concluded that any short term adverse impacts on the global economy associated with acting on climate, would be eclipsed by the longer term adverse effects on the economy were the globe not to act. In addition, I think it is inevitable that New Zealand will have to move to a low emissions economy if it is to continue to be globally competitive, and the sooner we get on with it, the lower the overall costs of that process will be. In terms of the distribution of costs, I consider the choices we make about how we transition are likely to have much more of an influence on cost distribution than what target we select. Effects on low income households can be reduced by ensuring public infrastructure and urban design builds in low cost, low carbon opportunities (compare, for example, compact urban form with well developed low carbon public transport infrastructure, with low density cities where transition may rely on wide uptake of privately owned EVs). I support a science-based approach to emissions, which recognizes the different characteristics of different gases. None of the analyses I have had an opportunity to read appear to have reached a conclusion around what "sustainable levels" of short-term gases (in particular methane) amounts to, which many commentators suggest means further work and analysis is required. Like many others, I support the Climate Commission as the appropriate body to undertake this work. I also note the importance of cumulative emissions. I think there is much to be set for setting a cumulative emissions target as well as a target of net neutrality by 2050, given that ultimately success should be measured by the size of our 2018-2050 carbon footprint, rather than whether we reach 2050 with emissions at a certain level.

Clause

3. How should New Zealand meet its targets?

Position

Domestic emissions reductions only (including from new forest planting)

Notes

We have an opportunity to learn from the New Zealand experience with the ETS to date. The practice of allowing international carbon credits to be counted as domestic emission reduction appears to have been ineffective as far as limiting emissions. In addition, it seems fiscally imprudent from a whole-of-nation perspective, as it has resulted in funds that may otherwise have been used to restore New Zealand's landscape and grow/develop the domestic green economy, flowing offshore into "emissions reduction" schemes of questionable efficacy. As a nation we are in the enviable position of having both the landmass, the knowledge and the national wealth to reach our goals without the use of international credits. Once again, particularly given our historically high per capita emissions, I think taking a domestic-only approach is consistent with playing our role in ensuring a fair and just transition on a global scale, rather than relying on other countries to mop up our mess. I would also like to note here the importance of mitigation involving much more than just planting trees. Planting trees should be the port of last call in terms of emissions reduction. We should be seeking to reduce emissions at source, by decarbonizing national infrastructure, as that is the only way to ensure sustainability of the net neutrality target into the future.

Clause

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

Position

Yes

Notes

I do not consider that the 2050 target should be altered in response to “significant changes to the economy”, as (given the emphasis our society currently places on the health of the economy above all other considerations) it seems clear that this approach would just undermine the stability of the framework, which is not in the interests of anyone. However, I do consider it should be possible to revise the 2050 target in line with major changes in scientific understanding. It may be worthwhile considering an approach that sets out higher tests for revisions that make the target less ambitious, and lower tests for revisions that make the target more ambitious, particularly if “significant changes to the economy” is going to be a factor in decision-making on this point.

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

Yes - I agree with 5-year budgets set 10-15 years in advance, so that three are in effect at all times. I note that in the sector I'm familiar with - local government - there are legislative requirements to review and set 10 year budgets every three years, with a 30-year infrastructure strategy reviewed and produced at the same time. District plans - the engine room of the nation's spatial development - are meant to be revised every 10 years, but in reality are revised much less frequently. The development phase for each of these documents is long, which means you can add at least another couple of years to the timeframes that any inputs must be valid for. I imagine a number of different sectors have similarly long planning horizons. So having clear, stable interim goals to work with during these planning processes, for at least 15 years ahead, is absolutely essential to ensure alignment with national objectives like emissions reduction.

Clause

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

Position

No - emissions budgets should not be able to be changed

Notes

See response to question 4 and 5. I think alternations to the third emission budget should only be altered in response to major changes in scientific understanding, because of the uncertainty that changes will cause for all. The Government needs to consider the very long lead times for the planning in other sectors, like the local government sector, and stability is really helpful in assisting with these planning cycles.

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

See response to question 4 and 5. I think alternations to the third emission budget should only be altered in response to major changes in scientific understanding, because of the uncertainty that changes will cause for all. The Government needs to consider the very long lead times for the planning in other sectors, like the local government sector, and stability is really helpful in assisting with these planning cycles.

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

Notes

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. • the principles of Te Tiriti o Waitangi. However, I think that the following principle should be the primary consideration for the Commission: • the extent to which a proposed budget will assist to both keep emissions within the 2018-2050 cumulative emissions envelope, and to meet the target of net neutrality by 2050. In addition, I consider the following principles are missing from the above list: • the extent to which amendments to other policy or fiscal settings could mitigate any adverse effects associated with adopting the proposed budget; • the principle of diminishing returns - recognising that the emissions reduction trajectory cannot be linear, and that significant emissions reduction must happen early, if net neutrality is to be reached.

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

Yes, absolutely, the Bill must specify a strict time frame for producing a plan. Targets are completely inconsequential without a plan, at all levels of government. Given the interrelatedness of central and local government planning in New Zealand, local government will take cues from central government in terms of what actions it needs to be taking. From what I have read I understand that the failure to specify a timeframe for the adoption of plans has been the achilles heel of the UK's Climate Change Act

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

Plans must be comprehensive and address the role of sectors other than central government. Local government appears to be underemphasised in the document, particular as it relates to spatial/land use planning, and public infrastructure investment. These two areas of local government responsibility have an significant impact on both transport and agricultural emissions, and can prevent emissions at source. They also must be emphasised early in the implementation of this Act, as the lead times for planning in these areas are significant. I believe the plans must consider equity and take into account effects on the four wellbeings. I support the emphasis in the document on working with iwi.

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

Yes - the Commission should not be a decision-making body as it is not democratically established and to avoid conflicts of interest if it ends up monitoring itself. However, the Government should be legally required to consider and formally respond to the Commission's advice, and to provide an explanation if they do not act on it.

Clause

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

Position

Advising the Government on policy settings in the NZ ETS

Notes

See response to question 11. The Commission should not be a decision-making body as it is not democratically established and to avoid conflicts of interest if it ends up monitoring itself. However, the Government should be legally required to consider and formally respond to the Commission's advice, and to provide an explanation if they do not act on it.

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

Yes, although I consider that public health is also of importance, and there should be a weighting toward expertise in climate policy.

Clause

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

Position

Yes

Notes

Yes. I agree with Generation Zero's suggestion that this may require a separate adaptation sub-committee within the Climate 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

A risk assessment is essential, and I agree that the development of a national plan should sit with the Government rather than the Commission. Local government is in desperate need of greater central government support in this area. Council's are not only under-resourced to assess risks and adaptation options, but in some parts of the country it appears there is little political will to confront the issues. There is a need for national guidance and for targets and monitoring in the area of adaptation. It is certainly the case that

some adaptation issues need to be coordinated at a national level, so there is a need for a national plan, but it is likely that there will also be a need for the development of local plans.

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

Clause

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

Notes

I am very glad to see this conversation moving. Thank you.

You have elected to withhold your personal details from publication.