



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.

Publishing and releasing submissions

All or part of any written submission (including names of submitters) may be published on the Ministry for the Environment's website, www.mfe.govt.nz. Unless you clearly specify otherwise in your submission, the Ministry will consider that you have consented to website posting of both your submission and your name.

Contents of submissions may be released to the public under the Official Information Act 1982 following requests to the Ministry for the Environment (including via email). Please advise if you have any objection to the release of any information contained in a submission, including commercially sensitive information, and in particular which part(s) you consider should be withheld, together with the reason(s) for withholding the information. We will take into account all such objections when responding to requests for copies of, and information on, submissions to this document under the Official Information Act.

The Privacy Act 1993 applies certain principles about the collection, use and disclosure of information about individuals by various agencies, including the Ministry for the Environment. It governs access by individuals to information about themselves held by agencies. Any personal information you supply to the Ministry in the course of making a submission will be used by the Ministry only in relation to the matters covered by this document. Please clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that the Ministry may publish.

Personal / organisation details

You must provide either a company name or given name(s)

Company name _____

Given names Michael North _____

Surname _____

Contact person _____

Submitter type, pick one:

- Individual**
- NGO
- Business / Industry
- Local Government
- Central Government
- Iwi / Māori
- University
- Research Institute
- School
- Community Group
- Unspecified / Other

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**
- the Government sets a goal to reach net zero emissions by the second half of the century, and the Climate Change Commission advises on the specific target for the Government to set later.

It is critical that targets are set now. If they are not, then they will forever be kicked into touch through political expediency – just witness the last few decades of shocking inaction when we were ‘aiming’ to get our emissions down to the level of 1990.

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

Pick one:

- net zero carbon dioxide: Reducing net carbon dioxide emissions to zero by 2050
- net zero long-lived gases and stabilised short-lived gases: Long-lived gases to net zero by 2050, while also stabilising short-lived gases**
- net zero emissions: Net zero emissions across all greenhouse gases by 2050.

It is important that the term ‘stabilising’ means much lower level of methane emissions than emitted at present. Stabilising at current levels would be a disaster. The wording should be changed to ‘substantially reduced’.

It is probably not possible to reduce methane emissions to zero, hence the third option was not ticked.

The date for reaching zero carbon should be brought forward to 2040 to reflect the dire situation that we are in and the need for fast-tracking our emissions reductions.

3. How should New Zealand meet its targets?

Pick one:

> domestic emissions reductions only (including from new forest planting)

- domestic emissions reductions (including from new forest planting) and using some emissions reductions from overseas (international carbon units) that have strong environmental safeguards.

Using monoculture forests as carbon sinks is a dubious way of calculating net emissions as they are not secure as sinks- being vulnerable to fire, windthrow, slipping and disease for example. Figures are also open to fudging. Forestry sinks are a way of delaying action on actual emissions reductions. We need to see gross emissions reduced steeply and fast.

The use of foreign carbon units is fraught as it is difficult to trust in them, and because they can be falsely created or can lack permanence. For example if carbon from a REDD+ forest is the basis for the units, who is to say that the forest was going to be cut down if it hadn't been so designated, and how can there be certainty that it will not be felled, or lost to climate change in the future? The system is a con in my view. It is simply all about buying the right to pollute.

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

Pick one:

> yes

- no.

Yes, but only on the proviso that deadlines can be brought forward, not pushed out into the future.

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

no.

I approve of this framework, it seems sensible. It gives context and broader direction to any five year budget timeframe that we might be in.

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

Pick one:

yes, each incoming Government should have the option to review the third budget in the sequence

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

no, emissions budgets should not be able to be changed.

Yes but only on the proviso that it can be strengthened not weakened.

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

Pick one:

yes

no.

'Exceptional circumstances' must be tightly defined and have very limited application – such as a dire economic downturn of major proportions.

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

no.

Fully support this range of considerations.

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

no.

Absolutely. If not, there is always the temptation to put off politically painful decisions into the future.

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?

Emission reductions need to be targeted fairly so that they do not fall disproportionately on those that can least cope. Similar to a progressive tax regime, reductions should fall most heavily on those that can afford it.

The life supporting capacity of our ecosystems (natural and farmed) must be at the forefront of decisions in setting the rate of emissions reductions.

Communities will need help in transitioning to a low carbon economy, and so a robust framework will need to be devised to direct and ease the transition. Without bringing people along supporting the process will see the rise of populist leaders who will just tear up any plan to reduce emissions.

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

no.

The CCC should have the ability to hold governments to account and to publicly censure them when required – but not to have power over governments.

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:

- > **advising the Government on policy settings in the NZ ETS**
- makes decisions itself, in respect of the number of units available in the NZ ETS.

Much as I would like to support the CCC having the power over governments to force adherence to emissions reduction goals, the risks are too high that the CCC would become stacked with political appointments ensuring that little action would take place.

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**
- no.

The list lacks an expert in the climate change impacts on native species and ecosystems – a worrying omission.

Adapting to the impacts of climate change

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

Pick one:

yes

no

This is vital – in particular in helping /directing councils to make decisive actions on adaptation.

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

no.

Very pleased to see so much thought has gone into this and I approve of the suite of new functions being included.

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

no.

It is important that information is transparent, even at the risk of perceived commercial sensitivity. The situation is too dire to pussy foot around this.

FURTHER COMMENTS:

As with certain Acts of Parliament, it is important that a higher than 50% parliamentary vote should be required to change the Act. These are exceptional circumstances and we are staring down the barrel of annihilation. I would suggest a 2/3 or 3/4 majority.