Your submission to Zero Carbon Bill

Reference no: 11239
Submitter Type: Business / Industry

Clause 1. What process should the Government use to set a new emissions reduction target in legislation?
Position 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
Notes There is little information of how achievable such a goal is. Over ambitious goals can dishearten achievements and undermine activity.

Clause 2. If the Government sets a 2050 target now, which is the best target for New Zealand?
Position Net Zero Carbon Dioxide - Reducing net carbon dioxide emissions to zero by 2050
Notes Setting methane target to a net zero and acting punitively would likely result in the reduction of competitiveness of our Agricultural sector in the Global Market place. In a study published by Caroline Saunders et al. 2009 (Food Miles, Carbon Footprinting and their potential impact on trade) New Zealand dairy was found to be twice as carbon efficient per unit of product as the UK. New Zealand lamb four times more efficient. If we are to reduce the competitiveness of the most efficient producers in the globe, I think it is highly likely that less efficient producers will take opportunities, potentially making global emissions worse. Not better as the goal should be. Of additional concern, is the ability to accurately assess the carbon emissions of biological systems. I am aware of two carbon models that function in the market place. The Overseer model and a model owned by Alliance Ltd called Hoof print. Whilst I am not privy to the workings of Hoof print I have considered the mechanics of Overseer in assessing carbon. As an Agricultural consultant I view there many oversights in the current function of the model. If we cannot regulate with a publicly acceptable measure of error, it is my view that regulation should be kept to a minimum. In the aforementioned scenario I believe education is a far better tool to encourage behaviour change rather than punitive taxes or approaches. I believe the Government should be supporting the initiation of low carbon labelled product lines and the tools required to evidence low carbon claims. For example the creation of a low carbon lamb product line may require some infrastructure investment, within processing plants and with the assessment criteria. If farmers were to be paid more for low carbon lamb, industry would see the value in investing in these technologies. In my view the Government could and should play a role. Overall I would much prefer that Government actions to influence Methane output were in the form of supporting carbon efficiency. i.e Less carbon per unit of product.

Clause 3. How should New Zealand meet its targets?
Position Domestic emissions reductions only (including from new forest planting)
Notes

Clause 4. Should the Zero Carbon Bill allow the 2050 target to be revised if circumstances change?
Position Yes
Notes Climate change science has been shown to be less than settled. There is a lot happening in this spaced. In my opinion the Government needs flexibility for effective change to occur.

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

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

**Position**
Yes - each incoming Government should have the option to review the third budget in the sequence

**Notes**

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 Say

**Position**
Yes

**Notes**

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 Say

**Position**
Yes

**Notes**

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

**Position**
Yes

**Notes**

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**
Supporting carbon efficiency within the Agricultural sector. Not in the form of subsidies. In the form of overcoming market entry barriers and research + development.

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 Say

**Position**
Yes

**Notes**

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**

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 Say

**Position**
No

**Notes**
The make up of the climate commission should be dependant on which sectors are included. Sector representatives should be included to ensure practical applications at a governance level.

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

**Position**
Yes

**Notes**

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**
No

**Notes**
This proposal seeks to create continuity across successive governments. Our understanding of climate change, influences and solutions is relatively rapidly changing. We need short term actions but long term flexibility.

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**
No

**Notes**

You have elected to withhold your personal details from publication.