

Your submission to Zero Carbon Bill

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Reference no: 11249

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 2050 target in legislation now

Notes

We need action ASAP and this is more likely if a legislated target is established now. Future Parliaments can ammend the legislation if necessary

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

Including methane will buy more time for the economy to adjust in other ways. Time is of the essence. The economic modelling shows that most of the costs are paid under options 1 and 2. Going for all gases costs very little extra by comparison.

Clause

3. How should New Zealand meet its targets?

Position

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

Notes

This is an international problem. Buying in units from countries with strong policies will help them and help us.

Clause

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

Position

No

Notes

The target can be revised anyway, by ammending the legislation.

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

No - emissions budgets should not be able to be changed

Notes

As noted above (twice) future Parliaments can change the legislation if necessary. There needs to be a significant hurdle for changing the targets & budgets. Otherwise we will politicise the issue even more than it already is.

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

No

Notes

reasons already described above.

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

Position

Yes

Notes**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

Targets are useless without plans to achieve them.

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

There is a serious risk that the "technology" focus you envisage for agriculture will be dominated by those selling technologies, and overlook the huge potential for soil carbon sequestration. You must work with people who are willing to expand the research base needed to realise this opportunity.

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**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

Makes decisions itself in respect of the number of units available in the NZ ETS

Notes

Take this out of politicians hands, please. Give the CCC the right directions and constraints in legislation and leave them to it. If you want to promote even more certainty, require the CCC to publish and defend something like the Input Methodologies required of the Commerce Commission when regulating under Part 4 of the Commerce Act.

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

No

Notes

These are pretty good, but I recommend elevating "competitiveness" to above the line (needed, rather than nice to have)

Clause

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

Position

Yes

Notes

I like the proposal on this aspect

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

I agree, noting that lots of this stuff will need to be actioned through decisions under the Local Govt Act and the RMA

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

Good idea, but *please* make the reporting compulsory. Lack of compliance with polite information disclosure requests has been a serious problem in industry economics in NZ. By contrast, well-designed compulsory disclosure is the lynch pin around which our (now) successful monopoly regulation depends.

Clause

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

Notes

I should disclose my perspective. I am a dairy farmer and a consulting economist working on competition & regulatory issues.