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.

Personal / organisation details

** I request my address is not published***

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

Company name

Given names   Elizabeth

Surname   Walker

Contact person

Submitter type, pick one:

[X] Individual

[ ] NGO

[ ] University

[ ] Community Group

[ ] Unspecified / Other

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2050 target

1. What process should the Government use to set a new emissions reduction target in legislation?
   
   Pick one:
   
   X 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.

   The government should set the target in law now, with the ability to make the target stronger in response to the Commission’s early advice. The target should be based on the most up to date climate science, on our international obligations and on principles of global equity. (New Zealand is a wealthy, high emitting country and should do its fair share).

   We believe that net zero is needed by 2040 – so we prefer a target for 2040 in the legislation.

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

   X net zero emissions: Net zero emissions across all greenhouse gases by 2050.

   - We believe that net zero emissions across all greenhouse gases is needed by 2040. If everyone in the world does this then the tuatara and other rare NZ fauna may survive. 2 degrees of warming is too high. Our scientists tell us we cannot afford more than 1.5 degrees.

   - We believe the legislation target should be Net zero emissions across all greenhouse gases by 2040, or earlier if the IPCC’s October 2018 report provides guidance that global emissions need to be reduced faster.

   - The emissions from transport, industrial activity, agriculture, and all other sources should be included in the target. Even ‘short-lived’ gases like methane can have a huge effect on our climate and need to be reduced.

   - Take a science based approach. Negative levels of long lived gases, and reduce shorter lived gases including methane to sustainable levels.

   - Note: this approach means taking a scientific approach to different gases. It does not mean treating the agricultural sector differently from other sectors. Nitrous oxide, which is primarily emitted through agricultural practices, is a long-lived greenhouse gas which must be reduced to net zero. The science is clear that methane emissions must also be reduced.

3. How should New Zealand meet its targets?
   
   Pick one:
X  **domestic emissions reductions only (including from new forest planting)**

- In the past many poorly vetted carbon credits hurt the carbon market’s credibility. Rich countries like NZ won’t do their part to reduce emissions if they can buy reductions from other nations.
- International emissions units will be volatile in price – and relying on these undermines decisive domestic investment here in NZ.
- Relying on international tradeable emissions units means NZ misses out on opportunities for wellbeing and equity co-benefits of reducing our domestic emissions. This means delaying the real changes for later, when they may be poorly planned and rapidly executed, with fewer co-benefits and greater likelihood for negative unintended consequences than well thought out plans starting now.
- This should not stop New Zealand from purchasing international carbon credits as an **additional contribution** to global mitigation efforts. Purchasing credits helps other countries finance their transition to a zero carbon economy.
- If international credits are allowed then New Zealand must do adequate due diligence on other countries’ carbon markets, much as they do in the context of trade, when officials take part in cross-border negotiations. Bilateral discussions and checks would be needed to ensure that any emissions reductions purchased are genuine.
- NZ needs a far greater focus on research into NZ flora and Fauna than to date. We understand we are way behind in terms of effects of wet/dry and temperature changes on both flora and fauna. We also need strong guidelines on carbon credits in relation to native trees, and should distinguish between “native trees for commercial forests” and standards for “native trees in revegetation projects” – ie for long term naturalisation. R&D funding, standards, guidelines to communities are needed ongoing as learning evolves. This relates to both mitigation (carbon sinks) and adaptation (survival of native flora and fauna).
- A budget for climate change research and standard setting is required. In addition, the somewhat unclear billion trees project aspiration should be structured to focus on natives and revegetation where appropriate.

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

Pick one:

- yes
- no.

**Targets should be revised only if there are major changes to either scientific understanding, or changes in international agreements.**

The target should only be altered to **increase climate action** ambition in response to updated scientific recommendations. There must be no backsliding (i.e. weakening of the target e.g. for ‘economic’ reasons).
Emissions budgets

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?

Pick one:

- [ ] yes
- [ ] no

- Yes - we should adopt the best of the UK example. Three 5-6 year emissions budgets covering the next 18 years, with our “legislated net zero emissions by 2040 target”, gives the certainty needed for action and investment now.
- Consider whether 6 years (2 election cycles) makes more sense in NZ context. UK’s 5 years matches their election cycle.
- Given the urgent need for global emissions to peak by 2020, the Act could also include the requirement for the Commission to urgently set an initial 2-year Emissions Budget. This 2-year Budget would fit within the first 5-6 year Emissions Budget.

6. Should the Government be able to alter the last emissions budget (i.e., 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.

The last budget should be able to be reduced if needed to respond to emerging international evidence. The Zero Carbon Act should also permit any Government to act so NZ can emit less than budgeted.

However, emissions budgets cannot be increased, unless the Government changes the Act through the usual Parliamentary process.

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.

The second budget should be able to be reduced if needed to respond to emerging international evidence. The Zero Carbon Act should also permit any Government to act so NZ can emit less than budgeted.

However, emissions budgets cannot be increased, unless the Government changes the Act through the usual Parliamentary process.
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.

- The physics of climate change comes first for setting Emissions Budgets – the bottom line is what ends up in our shared global atmosphere and oceans, and making sure ecological tipping points are not breached.
- As the impacts of unmitigated climate change will be highly regressive on New Zealanders the priority of the Climate Commission’s Emissions Budgets must be robust emissions budgets, consistent with the best possible chance of limiting global warming to 1.5°C degrees.
- Socially we expect a fairer, just, and sustainable Aotearoa-NZ.
- Given the greater responsibility of well-resourced nations like NZ, the main Budget considerations should be:
  - scientific knowledge regarding climate change
  - technology relevant to climate change
  - Obligations under Te Tiriti o Waitangi
  - Global leadership, including international equity

**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.

Yes - let's not repeat the UK's mistake, the Zero Carbon Act must require the Government to respond by publishing plans to stay within budget as rapidly as feasible, within a set time limit that is certainly less than 12 months. Emissions budgets are at least as important as fiscal budgets.

Further we believe the Climate Commission’s reports on budgets and recommended policy interventions to meet a budget be released to the public at the same time it is provided to Government, and that a mandatory timeframe within which the Government must decide and report on the budget and policy package be set in the legislation.

Reasons:

- Simultaneous release to the public and Government helps to ensure Government accountability and transparency.
- A key failing of the UK Climate Act is the failure to include a specific time period within which the Government must make a decision and report on each interim budget and the policy package to achieve it. We are informed this has resulted...
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?

- The Government’s policy plans to meet emission budgets should be comprehensive, fair, cost-effective, environmentally sustainable, and reflect a commitment to Te Tiriti o Waitangi.
- This means health equity is essential in planning and monitoring – all regressive policies (including ETS settings) must be effectively offset for vulnerable communities.

**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:

- [X] yes
- [ ] no.

- let’s put climate action beyond politics - create a new, non-partisan body of experts to guide the country in this transformation
- An independent Climate Change Commission of experts should monitor emissions and give advice to keep New Zealand on-track for its emissions reduction goals.

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:

- [X] 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.

CCC should not decide the number of units nor the implementation.

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.

-We agree with the following collective expertise:
  - climate change policy (including emissions trading)
• resource economics and impacts (including social impacts, labour markets and distribution)
• te Tiriti o Waitangi, te reo me ona tikanga Māori and Māori interests
• climate and environmental science including mātauranga Māori
• experience with addressing adaptation challenges like planning, insurance and local government
• risk management
• engineering and infrastructure
• community engagement and communications.
• business competitiveness
• knowledge of the public and private innovation and technology development system.
• Also expertise in public health is important along with experience in achieving social change.
• The Commissioners should include sector experts, with a high level of standing in society.

- Further the Commission should have a regional presence and should hold meetings around the country with key entities to provide information and gain insight into local problems and solutions. It should also hold open public consultation and briefings.
This is because:
• Climate change is unprecedented and unpredictable. Adaption will require National leadership and local solutions. Failure to engage on a regional level with key entities facing the reality of the physical impacts of climate change and/or having to develop and implement strategies to reduce emissions, risks development of national policy in a bubble with little or no ability to be applied in practice or with suboptimal implications for communities and business.
• Communication will be essential to engage communities. Face-to-face opportunities to hear from and advise the Commissioners will assist in the building of trust that Government is acting to protect their future.

Adapting to the impacts of climate change

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

Pick one:

X yes

☐ no

– Yes - let’s prepare for the impacts we can’t avoid. We need a National Adaptation Plan which identifies:
  o For existing development and communities, when defence is appropriate and when managed retreat is required.
  o For new development, what considerations must be applied when making decisions on future zoning to ensure new development does not occur in areas exposed to climate risks.
  o National direction and leadership on this issue is needed to avoid creating added tensions at the local level.
- Zero Carbon Act should also provide a framework for the help we give our neighbouring countries facing climate change. Transparency in international climate finance is also important - let's help our Pasifika neighbours – they need to adapt too. NZ should be seen to prioritise aid which assists in adaptation, while we get on with mitigation ourselves.

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.

- We agree with the proposed functions below, but recognise that nuance is required in terms of how local councils are involved:
  - a national climate change risk assessment
  - a national adaptation plan
  - regular review of progress towards implementing the national adaptation plan
  - an adaptation reporting power
- In order to ensure the Commission is not side tracked from mitigation as a top priority, the Adaptation plan should come under something like the existing Climate Change Adaptation Technical Working Group or an adaptation sub-committee
- Mitigation and adaptation could be deeply interlinked – so often mitigation and adaptation can be addressed together in the same policy (e.g. housing). But care must be taken in designing adaptation policies to ensure that climate-damaging emissions are not increased
- We believe the Climate Act requires the establishment of a cross Ministry body of Chief Executives of each Ministry. This group should meet regularly to ensure that decisions across government portfolios are aligned with and contributing to New Zealand's climate goals. (Effective climate action is going to require changes across all parts of society. Requiring communication between Ministries and senior official accountability for climate change-appropriate decision-making should prevent problems reported in UK. E.g. failure by some Ministries to properly consider climate impacts in decision-making has resulted in decisions in some sectors running contrary to climate goals e.g. in respect of Transport and Housing.)

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.

A targeted adaptation reporting power could start with voluntary reporting in the first year, and require compulsory reporting in subsequent years.