

# Your submission to Zero Carbon Bill

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## Reference no: 11577

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

A clear target is needed to provide leadership and greater certainty. The business sector urgently needs this certainty to encourage innovation and investment in low carbon solutions.

### Clause

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

### Position

Net Zero Long-Lived Gases and Stabilised Short-Lived Gases - Long-lived gases to net zero by 2050 while also stabilising short-lived gases

### Notes

As a minimum, support for Option 2, but only if biological methane is stabilised at a level consistent with science, which should be well below current levels. The scientific advice should come from the Climate Change Commission(Commission), which should be binding. Methane leakage from fossil fuel extraction and distribution should be treated as long-lived gas, as it is not part of the short-term carbon cycle.

### 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

Support for Option 2, but on the basis that the clear priority, and expectation, should be given to domestic reduction activity through new forest planting and potentially other sequestration activities (e.g. soil carbon). But there should probably be an allowance for some use of environmentally robust carbon credits (units) from overseas (subject to the four tests specified on page 33 of the discussion document), as such credits could provide least cost abatement. The Commission should probably advice on the conditions when international credits could be considered, with the default being domestic activity. It is worth noting that there must be a question mark over the availability of overseas credits given most countries would need to make significant reductions to meet their own targets so are unlikely to have large quantities of credits available for export. Therefore, we should be very cautious in any assumptions on availability of credits for import to NZ.

### Clause

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

### Position

No

### Notes

There is a need for certainty, therefore the target should not be revised, unless there are major changes in scientific knowledge or fundamental changes to international laws, agreements or systems. If so, that should be done through legislative change.

### 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

This is needed to provide certainty and also to ensure that short-term political expediency does not affect the budgets.

### 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**

Budgets should be able to be lowered but not increased. An increase could only be considered if there is pre-defined set of exceptional circumstances.

**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**

**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**

The need for comprehensive and detailed plans is essential and should be established within 12 months of the setting of the budgets by the Climate Change Commission.

**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**

The Commission should not be a decision-making body. It would be inappropriate for it to have decision-making powers, given the potential impacts of any decisions – such decisions should be made by elected representatives. However, it is essential that there is full transparency over the advice given, and that the government should be compelled to publish a detailed response to the advice, providing clear reasons if the advice is not followed.

**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**

. The Commission should not be a decision-making body. It would be inappropriate for it to have decision-making powers, given the potential impacts of any decisions – such decisions should be made by elected representatives. However, it is essential that there is full transparency over the advice given, and that the government should be compelled to publish a detailed response to the advice, providing clear reasons if the advice is not followed.

**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**

The Commission should be based on independent experts in the areas specified, not be based on sectoral representatives.

**Clause**

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

**Position**

Yes

**Notes**

Yes, but its inclusion should not be at the expense of prime focus on mitigation action.

**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**

National co-ordination is essential. The current approach, with local authorities having to take the lead with minimal support and guidance, is wholly inadequate.

**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**

Should cover key public and private sector organisations.

**Clause**

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

**Notes**

There is no consideration of consumption-based emissions. This is a gap. Whilst the focus should be on territorial emissions (not least as we have more control over them, and the global carbon accounting system is based on them), it is important that we monitor and report on consumption-based emissions too (albeit there is less certainty over such emissions). Typically for developed countries, consumption-based emissions are higher than territorial-based emissions (although this may not be the case for NZ, with its unique emissions profile). We need to know that our overall impacts, from all our activities, are reducing. Of course, if there is comparable emissions reduction action globally then we can expect the 'embodied' emissions of imported goods and services to reduce as NZ's territorial-based emissions reduce. But, there is no guarantee that this will be the case, and the rate of reduction is likely to differ between countries. By including a consumption-based emissions element in our regulated system then the impact of our consumption can be appropriately monitored and form part of the communication of progress.