

# Your submission to Zero Carbon Bill

Clifford Paul Mason

## Reference no: 11710

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 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

Net zero is a problematic concept for carbon compounds of fossil origin which cannot be offset by biological sequestration. Any introduction of fossil carbon into the biosphere is irreversible and results in an increase in total biospheric carbon load. There is no action short of geological sequestration (which is functionally impossible) that can reduce the increased total carbon in the biosphere. The biosphere itself, compromised by reduction of vegetation and by the effects of climate change is increasingly unable to adapt to the fossil carbon burden. The assumption that biological sequestration neutralises the effect of fossil carbon released into the biosphere is simply wrong. Biological sequestration is short term and not without significant effects in itself. Afforestation cannot be legitimately considered to offset fossil carbon emissions.

### 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

Note the comment regarding 'net zero' above and the inability to offset fossil carbon emissions. However, emissions of short-term gases of biological origin (but not fossil origin), particularly agricultural methane, can legitimately be offset by biological sequestration of carbon dioxide. The timeframe of sequestration by forestry closely matches the persistence of atmospheric methane. As a result, it is possible to sequester carbon dioxide equivalent to the global warming potential of biological methane emissions over the same time course. Rather than 'stabilise' short-term gases, the aim should be to offset them.

### Clause

3. How should New Zealand meet its targets?

### Position

Domestic emissions reductions only (including from new forest planting)

### Notes

New forest planting can effectively offset our agricultural methane emissions. It cannot offset fossil carbon emissions which must simply be reduced as rapidly as possible to zero (absolute, not net). This reduction should be achieved domestically on grounds of natural justice and responsible global citizenship.

### Clause

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

### Position

Yes

### Notes

The net zero target is likely to be recognised as fallacious and an absolute target would need to be set. Climate change is tracking ahead of most of the models upon which plans for mitigatory action has been based and more drastic targets and action are likely to be required.

### 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

It is important that there is long term certainty to guide investment. It would be preferable to define budgets out to the zero end point and to plan for emissions reduction on a straight-line course. This would maximise certainty of expectations and avoid the risk that plans for reduction will be loaded toward the later parts of the timecourse to zero.

**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**

The political pressure to change the budgets could be negated by the course proposed above of linear progression to zero endpoint with equal budgets at each interval and unable to be changed.

**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**

Yes

**Notes**

Only to increase stringency or to compensate for shortfalls in reductions under a previous budget.

**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**

While it may be assumed to be included under 'scientific knowledge of climate change', given the specification of other aspects (financial, social, etc) the environmental/ecological effects of climate change action/inaction should be specified under matters to be taken into account. The threat posed by accelerated climate change is primarily expressed in effects on the natural environment and many of the effects in other areas are secondary. If there is not a high level of expertise in and strong advocacy for environmental matters, the Commission will be greatly compromised in its effectiveness.

**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 budget is defined by a time period and plans to meet the budgeted constraints must be also or risk making the budgets meaningless.

**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**

The most important factor in emissions that force climate change is fossil carbon. The most important issues are therefore the use of fossil fuel and the manufacture of cement. As the primary factor in climate change, direct control of fossil fuel supplies is the simplest and most effective means by which to achieve emissions reduction. Fossil fuel supplies should be budgeted rather than the more nebulous emissions. A straight line reduction from current volumes (designated in carbon to allow for flexibility in the mix of fuels provided) would give absolute certainty of the availability of fossil energy supplies over time and would allow the market to do what it does best - allocate a limited resource. Fossil fuel enters the economy through a handful of portals largely under the auspices of petroleum refining and retailing companies who monitor quantities and quality routinely in the course of their business. A legislated cap on fossil fuel supplies, reducing linearly over time, would be effective and administratively straightforward. It would result in the market setting an effective and efficient price on carbon rather than this price being artificially established. The petroleum industry should be the first sector to work closely with to effect this progressive elimination of fossil carbon from our economy. The cement industry should also be a partner in reducing emissions from cement manufacture. The possibilities for transition to geopolymers material manufacturing needs to be explored. The building industry including architects, construction and deconstruction companies need to also be involved in minimising the use and wastage of portland cement.

**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**

Advising the Government on policy settings in the NZ ETS

**Notes**

As the ETS depends to a large degree on the fallacious equivalence of fossil carbon emissions and biological carbon sequestration, the entire basis of its operations is untenable as presently constructed. Given the widespread investment in the Scheme it would be very difficult to close down. It could however be adapted to trade genuine emissions offsets in the agricultural methane/forestry carbon sequestration setting (see above under Question 2).

**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****Clause**

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

**Position**

No

**Notes**

The Bill is better kept focussed on mitigation which has been made complex enough. Adaptation involves too many areas of the economy and society to be readily brought under one Bill.

**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**

These are a fundamental part of the response to a clear and present danger. The risk assessment is a basic part of the Climate Commission's role but adaptation is the business of the government, informed by the Commission.

**Clause**

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

**Notes**

Reiterating the salient points made above: 1) There is a fundamental difference between fossil carbon that has been outside of the biosphere for aeons and biospheric carbon that is part of current carbon cycles. 2) Any system (e.g.ETS) that considers these as equivalent is flawed. 3) Budgeting fossil fuel would be simpler and more effective than budgeting emissions and would not inflict an artificial and only marginally effective cost of carbon on the economy. 4) Agricultural methane emissions can be offset by forestry sequestration and could underpin a legitimate emissions trading scheme. 5) NZ should take full responsibility for emission reduction by domestic action. And in addition: It has been fundamental to climate change mitigation efforts for decades that one could have a defined emission price and uncertain reduction or a defined reduction and uncertain price. At this late stage in climate change, there is no longer any choice. Emissions must be reduced drastically and therefore must be planned for directly rather than through the mechanism of price signals. This reasoning underpins the proposal above for budgeting fossil fuel supplies and leaving the price to the market.