

# Your submission to Zero Carbon Bill

**Reference no:** 11800

**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**

**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**

A more objective form of GHG accounting is also essential. For more information:

<https://www.theaustralian.com.au/business/business-spectator/holes-in-the-carbon-accounts/news-story/2dfd91ced5c80dfdfcf1385b859b592d>

**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**

Ideally, domestic action is best. If you go to the international markets for cost reasons you need to make sure the market is not flooded with cheap credits. For more information on the history of this, please see the below report and Bloomberg article which called a crashing of the NZU price in 2010. Idea Carbon, (2010), The future of industrial gas CERs and what it could mean for New Zealand: [http://www.unep.fr/ozonaction/ozone2climate/Industrial\\_gas%20ERs.pdf](http://www.unep.fr/ozonaction/ozone2climate/Industrial_gas%20ERs.pdf) Bloomberg (2010), 'Homeless' UN Emission Offsets May Flood New Zealand <https://www.bloomberg.com/news/articles/2010-12-02/-homeless-hfc-23-carbon-offsets-may-flood-new-zealand-ideacarbon-says>

**Clause**

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

**Position**

No

**Notes**

To drive investment - policy certainty is a requisite.

**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**

**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****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 government needs to clearly and concisely identify the policy gap to meet the budgets and avoid policy overlap. Europe made this mistake in 2008 when setting its 2020 plan, as renewable energy mandates cannibalized demand for EUAs. Please see the below report I authored with Bryony Worthington, one of the individuals responsible for the UK's climate change act. Sandbag (2015), Putting the Emissions Trading Scheme in context: <https://sandbag.org.uk/project/putting-the-emissions-trading-scheme-in-context/>

**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****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**

Yes

**Notes****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****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**

**Clause**

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

**Notes**

Sorry I don't have time to write more. Good luck and do get in touch if you would like to discuss further.

**You have elected to withhold your personal details from publication.**