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 Emissions can be a guiding target but more specific targets should be set by the Climate Commission once they have examined the cost/benefit structure and impact to NZ of setting any particular emissions reduction path.

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**
If we are going to approach this in a comprehensive manner, then all relevant emissions should be considered. The important issue to focus on is whether the right price signal can be sent, in order to provide incentives for change e.g. If methane emissions can be priced (in terms of either their cost to the environment or cost to mitigate), then that can be used to send a price signal to the market, as to the true cost of the methane generating product, whether it is dairy or beef.

Clause 3. How should New Zealand meet its targets?
**Position**
Domestic emissions reductions only (including from new forest planting)

**Notes**
As a starting point, I am not in favour of using international emission reductions, which might be counter intuitive given my preference for a global approach. However, we have enough work to do here, and enough opportunities to realign our local economy, that our focus should be quite singular on our own activities. That said, given carbon leakage and the current lack of trucost pricing in New Zealand's global supply chain, taking into account overseas emissions will become more important, and presuming validation processes, at some point in the future, using international emissions reductions, especially ones linked to our supply chain, may be an option.

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

**Notes**
Absolutely. The global climate is a variable and compel system. Making sure we have the correct framework to set appropriate budgets is more important, and monitoring and residing to shifts in outcomes will be necessary. Zero Carbon as a target is about as relevant as 100% Pure NZ but I can live with it as an initial clarion call. Overtime, we must understand our impacts, local and global, and how we can make the required structural shifts. Not just in emissions outputs but mitigating and adapting to global climate shocks, the impacts of which we still are not clear on.

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**
I support 5 year rolling budgets, that can be updated and modified as new information becomes available.

Clause 6. Should the Government be able to alter the last emissions budget (i.e. furthest into the future)?
**Position**
Yes - each incoming Government should have the option to review the third budget in the sequence

**Notes**
The Climate Commission, if structured properly, should operate independently of any new government. Ultimately, it will be up to any...
government to respond to budgets set by the CCC and those budgets, and the assumptions that underpin them, should be open to challenge in the way any budget can be challenged.

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
I agree with these high level considerations but would like to see more detail. There are many interconnected and moving parts in any environmental budget, and there will be many unintended consequences and impacts of shifting the economy onto an emissions based system. Carbon leakage is a particular issue that we should be concerned about, as understanding the emissions of our supply chain (electric batteries is a good example) is as important as our local outputs.

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
This is going to take time to embed but some clear timelines will be important, so people can plan ahead.

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 be realistic. Our global impact is negligible and so our focus should be more on: - Identifying the major economic shifts required. - Pricing emissions appropriately, allowing for innovation (e.g. emissions neutral dairy and beef - trucost priced). - Understanding our true emissions profile (domestic and international). - Focusing on the important sectors and driving innovation and change (transport + agriculture/forestry).

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
In reality, the adaptation issue is the most important one for us. It's a matter of national security that we understand and keep modelling potential outcomes of climate shifts, with in terms of natural hazards and economic impacts.

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
This is a very tricky area and the role of the CCC should be to provide expert advice to the Government of the day, so that any decisions can be made with a clear understanding of the trade offs.

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
A holistic view of risk management is crucial here, and will require a broad sweep of risks, including, but not limited to: environmental, financial, economic, social, cultural and international relations (the IR environment is likely to be a high risk). Ticking all the individual skill boxes you have listed is good but you will need multi-disciplinarians, who can think across all these areas.
Clause 14. Do you think the Zero Carbon Bill should cover adapting to climate change?
Position
Yes
Notes
Of course. What's the point otherwise? This is primarily an adaptation process...I sense that too many people see Zero Carbon or Carbon Neutrality as some holy goal, which will lead to some kind of planetary nirvana. This is not the case. We are engaged in a process to somehow modify the projected climate track (global heating, storm, flood, rainfall frequency and so on), but this is going to be a shifting system, which we will always be adapting to. So let's be clear about this. Zero Carbon can only ever be a guiding post. It is not an end destination.

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
This work should sit within a National Risk Agency. How that might fit together is open to discussion but ultimately what we are talking about here is primarily a risk management process.

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
Yes, the finance and insurance sector overseas are already doing this. This is just another risk to add into the risk analysis framework. The ECB and other Central Banks are already looking at more specific climate risk assessments.

Clause
Do you have any other comments you'd like to make?
Notes
This is a good start. The right frameworks, with the right information, will help us realign our economy onto a more sustainable path. There is no doubt that a changing climate poses both risks and opportunities to our economy, and I support the setting up of a Climate Change Commissions to do this work. My only concern is the focus on Zero Carbon/Carbon Neutrality. I know these are attractive slogans but I would hope the serious work will be done around our risks, adaptation and mitigation. Climate change is a global issue, and likely only to be solved by action from the major fossil fuel producers (Manji 2008). The impacts will vary from region to region and country to country. We need to understand those impacts and how we will deal with them. I believe this Bill, name apart, is an important step on the road to a more proactive risk management system for NZ and, hopefully, a driver for real innovation and a more sustainable (and more Pure!) NZ.

Supporting documents from your Submission

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