

# Your submission to Zero Carbon Bill

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**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

### 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

The first two options are cop-outs. The aim is to reduce net emissions of GHGs as far as possible to minimise climate change. For the first option, carbon dioxide is only one of a number of GHGs. Why would those other than carbon dioxide be ignored? In the second option, why allow short-lived gases to be only stabilised? Methane is the most obvious example here. It is true that regular emissions of methane will eventually build up to an equilibrium concentration in the atmosphere, at which the rate of breakdown of existing atmospheric methane just equals the rate of addition of new methane. Thus ongoing emissions of methane will not lead to an increase in the global warming potential of the atmosphere. But the concentration of methane in the atmosphere is now much higher than in pre-industrial times and it is contributing to climate change. Furthermore, because it is a short-lived gas, if emissions were reduced or ceased the concentrations of methane in the atmosphere would decrease, as would the warming potential of the atmosphere. Therefore reductions in methane emissions will have a benefit in terms of climate change, regardless of whether it is a short-lived or long-lived GHG.

### Clause

3. How should New Zealand meet its targets?

### Position

Domestic emissions reductions only (including from new forest planting)

### Notes

Buying emissions from overseas is again a cop-out

### Clause

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

### Position

Yes

### Notes

There would need to be compelling reasons for change, but the possibility should be there.

### 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

Yes - the third emissions budget should be able to be changed but only when the subsequent budget is set

### 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**

Yes

**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**

But, a major reservation relating to bullet point 3 on economic impacts. Assessments of the cost of reducing emissions are often flawed because they do not consider possible benefits that would accrue from making the reductions. For example modelling the costs to the dairy industry of reducing GHG emissions usually assumes that the value of a kg of milk solids will be the same regardless of the GHG footprint. It is not usually possible to estimate in advance the level of premium that might be paid for dairy products with a lower GHG footprint. But responding to this uncertainty by assuming no such premium will be paid, as is usually done, overestimates likely costs and will affect the targets set by the Climate Change Commission.

**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**

This Zero Carbon Bill provides the opportunity to promote a major environmental brand for New Zealand. A brand that is much more credible and robust than the current "Clean, green, 100% pure". If done well, this could benefit most of our "export industries", namely agriculture and tourism, and would offset most of the cost. Thus, this initiative should be linked to a "whole of the economy" review to make the most of the opportunity.

**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**

The Commission should also consider market mechanisms outside the ETS. Agriculture, and dairy in particular, are well suited to a carbon tax that is levied on all GHG emissions from a farm. All the money collected is then paid back to the farmers as a tax refund, but the refund is per kg of milksolids. This would reward farmers who can produce milk solids with a low carbon footprint. It would provide a cost signal to farmers without imposing an additional overall cost on the industry. Such an approach would be easy to implement (it would take 3 lines on a normal tax return) and could be easily adapted to other sectors of the agricultural industry.

**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**

An ability to see "the big picture" is essential. As noted above, this initiative will provide New Zealand with some huge opportunities, if only we can move beyond our siloed thinking. To be honest, I am not sure that subject matter experts and public servants in our various ministries, such as those described on P 45, have demonstrated this ability in the past.

**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**

This is a great initiative. To make the most of it we must be bold in setting our targets, and innovative and entrepreneurial in leveraging this and other environmental initiatives to generate economic benefit, in its widest sense.