

# Your submission to Zero Carbon Bill

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## Reference no: 12343

**Submitter Type:** Business / Industry

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

### Notes

The term "net" as defined by the discussion document is not satisfactory. It does not reflect a true net value for the biological processes involved with pasture growth, soil carbon sequestration and native plantings. This is of major concern and needs to be addressed.

### 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

The environmental safeguards will need to be very robust, and the use of international carbon units should only be used during the transition phases to assist with continued financial viability of industry, but not as a permanent solution.

### Clause

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

### Position

Yes

### Notes

### 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 - each incoming Government should have the option to review the third budget in the sequence

### 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

But defining 'exceptional' now must occur so that a change in government can not use the promise of changing budgets as an election campaign strategy.

**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 bunch of headings is not very informative.

**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**

Must work with major stakeholders, especially the primary producers. B& L NZ must have a leading role in representing the situation for sheep and beef farmers. They have developed an interim implementation plan that is sound. Recognition of the gains already achieved by the sheep and beef industry since 1990. "We've reduced Sheep numbers from 57.9 million to 27.6 million and beef cattle numbers have declined 23%. Absolute greenhouse gas emissions from sheep and beef farms are 30% below 1990 levels while the sector's contribution to GDP has doubled to \$5 billion. GHG emissions per kilogram of saleable product have dropped by 40% and nitrate leaching per kilogram of saleable product has declined by 21%. The electricity generation in New Zealand needs better management and transparency. The drive to be 100% renewable is noble, but wind energy is grossly overstated as being strictly renewable with its reliance on fossil fuels for rotor maintenance and the devastation and degradation of sites where the raw materials are mined. To ignore the environmental impact of this mining because it occurs overseas is not true to the spirit of global partnership in dealing with climate change. Our improvement in reducing carbon emissions should not be at the expense of other countries.

**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**

But advisers can be ignored by the government.

**Clause**

12. What role do you think the Climate Change Commission should have in relation to the New Zealand Emissions Trading Scheme (NZ ETS)?

**Notes**

There needs to be a strong agreement between the government and the commission regarding decisions, so I partially agree that the Commission needs the ability to make decisions.

**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**

No

**Notes**

With such an emphasis on agriculture, surely the Commission needs to have professional expertise in this area, which does not appear on the list.

**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**

No

**Notes**

This should be under the umbrella of the Commission.

**Clause**

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

**Notes**

Forestry plantings are not without issue as seen by the devastation caused by heavy rainfall in the Tasman and Gisborne areas that were recently logged. Sheep and beef farms cover diverse landscapes, with numerous trees scattered across them. Many of these trees - whether they are shelterbelts, riparian plantings, erosion management plantings or blocks of native vegetation - are not counted in the Emissions Trading Scheme (ETS). Need to quantify the total carbon sink on sheep and beef farms (both inside and out of the ETS) Nearly half of all QEII National Trust covenants are found on sheep and beef farms (47%) and the area of sheep and beef land protected under QEII, Ngā Whenua Rāhui and other covenants is growing but not included in the ETS. The contribution of carbon sequestration made by pasture and soils needs to be included in determining net carbon emissions on pastoral farming systems. Without including these, the figures generated will be anything but a true. To assert that this task is too difficult is defeatist and sloppy. Sheep and beef farmers have made meaningful improvements to their environmental performance and lowering emissions and they deserve credit for these gains.