



Submissions form

We seek your feedback on the specific proposals in the Zero Carbon Bill.

Either email this submission to ZCB.Submissions@mfe.govt.nz (Microsoft Word document (2003 or later) or PDF) or post to Ministry for the Environment, PO Box 10362, Wellington, 6143.

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Personal / organisation details

You must provide either a company name or given name(s)

Company name _____

Given names Jan_____

Surname McChesney_____

Contact person _____

Submitter type, pick one:

- Individual
- NGO
- Business / Industry
- Local Government
- Central Government
- Iwi / Māori
- University
- Research Institute
- School
- Community Group
- Unspecified / Other

2050 target

1. What process should the Government use to set a new emissions reduction target in legislation?

Pick one:

- the Government sets a 2050 target in legislation now
- 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.

Optional comment

We need a climate-responsible net zero emission policy, and we need policy certainty. The second option could be construed as delaying NZ's commitment for up to a further 50 years.

2. If the Government sets a 2050 target now, which is the best target for New Zealand?

Pick one:

- net zero carbon dioxide:** Reducing net carbon dioxide emissions to zero by 2050
- net zero long-lived gases and stabilised short-lived gases:** Long-lived gases to net zero by 2050, while also stabilising short-lived gases
- net zero emissions:** Net zero emissions across all greenhouse gases by 2050 (qualified)

Optional comment

On the basis of the information offered I prefer Option 3 – it would be a statement of serious commitment and the need for transformational change in society and the economy.

Option 2 contains too many uncertainties. Stabilisation of emissions of short lived gases may be incompatible with global temperature goals depending on the level they are stabilised at (e.g. 'stabilisation' could mean they are stabilised at a level 50% higher than current emissions?). Better information on this aspect is needed before being able to determine whether Option 2 is consistent with overall climate change goals (and whether it might provide a more realistic target).
A politically consensual target would be highly desirable, but not a bottom line. Sometimes consensus is formed over time, not at the start.

3. How should New Zealand meet its targets?

Pick one:

- domestic emissions reductions only (including from new forest planting)(qualified)
- domestic emissions reductions (including from new forest planting) and using some emissions reductions from overseas (international carbon units) that have strong environmental safeguards.

Optional comment

Preference for Option 1, although not necessarily opposed to Option 2 if particular circumstances and strict conditions apply. I think the policy should start off with just allowing domestic reductions because this creates the maximum momentum around investment, infrastructure, institutional re-orientation, behaviour change etc., and maximises the potential for sustained longer-term reductions. At some stage in the future it might be beneficial to allow some international emissions units e.g. because of economic conditions in NZ, or because of mutual economic/environmental benefits for NZ and host countries. The Climate Commission could advise.

The main thing is to avoid the dampening and undermining effect that allowing international units previously had - on NZ investment, C price, momentum for change etc.

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

Pick one:

- yes
- no.

Optional comment

It is not clear that the ability to change the target needs to be incorporated into the Bill. If there is an overwhelming case to change the target presumably the legislation can be amended?

Incorporating the ability to change the target into the Bill risks giving the impression that it's a pretty flexible notion.

Emissions budgets

5. The Government proposes that three emissions budgets of five years each (ie, covering the next 15 years) be in place at any given time. Do you agree with this proposal?

Pick one:

yes

no.

Optional comment

In relation to the subsequent 2 questions a further consideration is whether the 3 successive budgets be specified within differing ranges i.e 1st budget doesn't have a range, 2nd budget specified within +/- 2%, 3rd within +/-5% (or whatever)?

6. Should the Government be able to alter the last emissions budget (ie, furthest into the future)?

Pick one:

yes, each incoming Government should have the option to review the third budget in the sequence

yes, the third emissions budget should be able to be changed, but only when the subsequent budget is set (qualified)

no, emissions budgets should not be able to be changed.

Optional comment

In principle I agree with option 2 but in relation to the preferred option for question 7 there is also the circumstance that the 3rd budget should be able to be adjusted if there is a case to adjust the 2nd emissions budget (see Q7 below).

With regard to Option 1 the whole process should be based around a consensual approach, whereby the need for changing the 3rd budget should be dealt with either as part of the process of setting the subsequent budget or in the case of exceptional circumstances (below).

7. Should the Government have the ability to review and adjust the second emissions budget within a specific range under [exceptional circumstances](#)?

Pick one:

yes

no.

Optional comment

The exceptional circumstances would need to be spelt out. This could include the reasons that might trigger a review, timing in relation to how far through the current budget is, and the limits to any possible change. This issue begs questions about the overall process for reviewing emissions budgets. Presumably some time

towards the end of each current 5 year budget, a process will be underway to determine a new third emissions budget to be put in place when the current budget expires. What is not clear is whether the only rationale for also reviewing the 2nd budget (the soon to become current budget) would be 'exceptional circumstances', or whether there would be a range of adjustments that could occur as a matter of the new budget setting (within some limits).

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?

Pick one:

yes

no.

Optional comment

Government response

9. Should the Zero Carbon Bill require Governments to set out plans within a certain timeframe to achieve the emissions budgets?

Pick one:

Yes (qualified)

no.

Optional comment

I generally agree with the proposal. In relation to when plans are published one option to consider is whether the Climate Change Commission should be empowered to request a review of the plan between scheduled review time periods. For example, in response to monitoring achievement of the target, the Commission may consider that the existing plan is incapable of achieving climate change goals, and needs review.

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?

Comment

No specific comments – essentially good practice policy design.

Climate Change Commission

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?

Pick one:

yes

no.

Optional comment

I agree with the rationale offered in the discussion doc and the Productivity Commission Report that decision-making power should be outside the scope of proposed Climate Change Commission's role.

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

Pick one:

advising the Government on policy settings in the NZ ETS

makes decisions itself, in respect of the number of units available in the NZ ETS.

Optional comment

As per comments above

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?

Pick one:

yes

no.

Optional comment

I strongly believe the specification of the range of prescribed (mainly technical) expertise for Commissioners is wrong. Yes, the Commission should have such expertise (or access to it) internally, and should be staffed by high calibre individuals. But I believe it is faulty thinking to suggest that individual Commissioners should be selected on the basis of having specifically prescribed 'expertise' in particular areas. The danger is that these individuals will be regarded as the last word in the particular areas of their expertise. It is impossible for any individual to serve that role, and the risk is that Commission becomes beholden to the views of individual 'experts' who may or may not represent a consensus view, whose expertise may or may not be as up to date or as broad as the Commission requires, and at a personal level they may or may not have the ability to work in a consensual, constructive way with other Commissioners.

In my view you task the Commission with particular areas they must consider as part of their work (e.g. fuel poverty, climate science, economics). It becomes the role of the secretariat to determine the best, and most appropriate expertise needed to achieve this – be this through consultants, secondments, working groups etc. The Commissioners’ role is much more about leadership, mana and ‘representativeness’, and the skills more akin to providing good governance (which would include skills such as oversight, risk knowledge, policy, accountability, and the ability to work collaboratively).

Adapting to the impacts of climate change

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

Pick one:

yes

no

Optional comment (these comments apply to this section as a whole)

I am not convinced by the arguments put forward for inclusion of this aspect. It feels like an after-thought, and not properly thought-through.

In one sense adaptation can be completely divorced from the overarching objective of the Zero Carbon Bill. There is no relationship between bringing our emissions down to net zero, and our need to adapt to a changing climate (in the sense that >99% of global emissions are out of our direct control). They are also quite different tasks requiring different understanding, skills sets and institutional responses.

We may well need a national adaptation risk assessment, and mandatory reporting, and we clearly need institutional change in order to ensure that planning for such risks is occurring sooner rather than later (e.g. Building Act, RMA changes). However I think this **deserves a focus of its own** rather than the rather inconsistent add-on that it seems to be here. For example the Discussion Document proposes that the Government, rather than the Climate Change Commission, holds responsibility for the national adaptation plan (p49) but earlier states that the Climate Change Commission would be responsible for a national climate change risk assessment (which is largely to inform the national plan). There seems little logic in tasking the Climate Change Commission with the risk assessment work, which is well outside of their zero-carbon priority.

15. The Government has proposed a number of new **functions** to help us adapt to climate change. Do you agree with the proposed functions?

Pick one:

yes

no.



Optional comment

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?

Pick one:

yes

no.

Optional comment