

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)

Given names: Mark Harinui

Surname: Thomson

Submitter type, pick one:

- Individual

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

Optional comment

The Government should set a target for 2050 in legislation now.

Fast action is essential to ensure that global warming stays within safe limits ie 1.5°C. New Zealand needs to do its fair share to achieve this.

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

Pick one:

- **net zero emissions:** Net zero emissions across all greenhouse gases by 2050.

Optional comment

Net zero emissions can be reached by achieving negative levels for carbon dioxide, together with sustainable levels for other gases.

3. How should New Zealand meet its targets?

Pick one:

- domestic emissions reductions only (including from new forest planting)

Optional comment

The main focus needs to be on rapidly reducing New Zealand's greenhouse gas emissions. Relying on international carbon units undermines decisive domestic investment in New Zealand and will lead to missed opportunities for health and equity co-benefits. International emissions units may also be volatile in price.

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

Pick one:

- yes but not for economic reasons as opposed to scientific reasons

Optional comment

The 2050 target should not be altered in response to “economic changes” as this undermines its long-term certainty. However, the ability to revise the 2050 target in light of major changes in scientific understanding or international agreements should be permitted. The target should only be altered to increase climate action ambition. There must be no weakening of the target, unless the Government changes the Act through the usual Parliamentary process. All Acts in New Zealand can currently be changed through due process under exceptional circumstances.

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

Optional comment

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

Pick one:

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

Optional comment

No. Emissions budgets should not be altered in response to “economic changes” as this undermines long-term certainty. However, the ability to revise budgets in light of major changes in scientific understanding or international agreements should be permitted. The Zero Carbon Act should also permit any Government to act so that New Zealand can emit less than budgeted. However, emissions budgets should not be able to be increased, unless the Government changes the Act through the usual Parliamentary process.

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

Pick one:

- no.

Optional comment

The second budget should be able to be reduced if needed to respond to emerging international evidence. The Zero Carbon Act should also permit any Government to act so NZ can emit less than budgeted. If there are exceptional circumstances, the Government can change the Zero Carbon Act to increase the emissions budget, through the usual Parliamentary process.

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:

- no.

Optional comment

No - I agree with only some of the considerations.

I agree with the following considerations:

- Scientific knowledge about climate change, sea level rise and ocean acidification
- Obligations under Te Tiriti o Waitangi
- Global leadership, including international equity

The physics of climate change needs to be the top consideration in setting emissions budgets, to ensure that ecological tipping points are not breached. The Climate Commission's Emissions Budgets must be consistent with the best possible chance of limiting global warming to 1.5°C and the greater responsibility of well-resourced nations like New Zealand.

Fairness within New Zealand and factors such as fuel poverty are important considerations when deciding *how* emission reductions will be achieved. However, these factors should not determine the *size* of the reductions that we are aiming for; this should be determined by scientific knowledge about climate change. It is important to note that the effects of climate change will also

increase inequities, as a greater burden will be borne by populations that are already disadvantaged.

Economic circumstances, fiscal circumstances, energy policies and technology may also affect *how* emission reductions are achieved but should not determine the level of emissions budgets or the pace of our economic transition.

Other considerations should include health and equity co-benefits.

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

Optional comment

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

The Government's policy plans to meet emission budgets should be comprehensive, fair and consistent with Te Tiriti o Waitangi obligations.

Health and equity co-benefits must be considered. Health benefits will partially offset the financial costs of actions to reduce emissions.

Other considerations include sustainable economic opportunities and technology relevant to climate change.

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

Optional comment

Yes. The Commission should not be a decision-making body. However, the Government should be legally required to consider and formally respond to the Commission's advice, and to provide an explanation if they do not act on it.

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

Optional comment

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

Partly.

I agree with the following collective expertise:

- climate change policy (including emissions trading)
- resource economics and impacts (including social impacts, labour markets and distribution)
- te Tiriti o Waitangi, te reo me ona tikanga Māori and Māori interests
- climate and environmental science including mātauranga Māori

- experience with addressing adaptation challenges like planning, insurance and local government
- risk management
- engineering and/or infrastructure
- community engagement and communications
- business competitiveness
- knowledge of the public and private innovation and technology development system.

Health expertise must also be included.

It is important that vested interests are not part of the Commission, particularly those with a financial interest in maintaining the status quo.

Adapting to the impacts of climate change

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

Pick one:

- yes

Optional comment

Adaptation must be a separate advisory work stream, to avoid overtaking the Commission's top priority climate mitigation role.

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

Optional comment

I support the following adaptation provisions:

- a national climate change risk assessment
- a national adaptation plan
- regular review of progress towards implementing the national adaptation plan

- an adaptation reporting plan

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

Optional comment