

Your submission to Zero Carbon Bill

Graeme Easte

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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

I support having specific targets (both interim and long-term) but these should be set by the Climate Change Commission after due consideration. However the legislations should set an aspirational goal of net zero emissions as a steer to the Commission of what is expected of them. To kick things off as quickly as possible I would hope that the first 5 year targets are set as quickly as possible with subsequent targets set in due course once there has been time to research and consult on them - please do not further delay the initial target any more than necessary.

Clause

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

Notes

I do not support any of these options as I think that they are unobtainable as outlined below. In the 32 years remaining until mid century I think that a halving of emissions is realistically obtainable, and we should aim to exceed that if we can, but a 100% reduction is hard to imagine in that time frame. If you want to go beyond 50% then perhaps the mid-century reductions target should be 80-90% as some other countries have adopted. Despite this comment, my preference is for targets that include all "Green house" gases to be included in the scheme - no more special pleading for agriculture.

Clause

3. How should New Zealand meet its targets?

Position

Domestic emissions reductions only (including from new forest planting)

Notes

I believe that applying credits from overseas would be false accounting - how could it possibly work if every country followed the same approach. What we should be aiming for is a reduction of our own domestic emissions (which is what we have control over), supplemented by carbon sinks such as trees.

Clause

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

Position

Yes

Notes

Yes obviously as circumstances may change along the way - though I recognise the difficulty that a future government might take the opportunity to dilute the intent of the legislation or the work of the Commission so there should be some tight restrictions on such a review - for example making the target an entrenched provision requiring a super majority (say two thirds) of the House to change it.

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

Yes absolutely - long term targets are meaningless unless backed up by interim (5 year) targets to see how we are going on the long term strategy and (if falling behind) what changes need to be made to the next interim target to get back on track for our mid-century goal(s). However the 10-year and 15-year targets should be seen as aspirational until time moves on and they become the next 5 & 10 year targets -i.e. they should be susceptible to refinement during the last year of the preceding 5 year plan. Trying to plan 15 years into the future is just too tricky to absolutely lock in the relevant targets that far ahead.

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

Yes but only in order to enhance our ability to meet the long-term goal. This could be managed by prescribing the circumstances - e.g. if we have fallen behind the long-term trend needed to achieve the mid-century goal(s), or where new technology makes it possible to move more rapidly towards our long-term goal. So there should be a presumption that any changes made to the interim goals are "ratcheted" in one direction only so as to increase the pace of reductions rather than allow any move to dilute or reduce our efforts.

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

Yes - but only as per my answer to Question 6.

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 the suggested considerations. While needing to move as rapidly as possible to reduce our emissions, we need to be careful to avoid "tanking" the economy by moving faster than industry can cope - for example changing to new manufacturing processes will require investment in new plant (probably using borrowed money, though there may be some limited tax-payer funded incentives) so there is a limit to what we can expect of businesses.

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

Yes of course. The previous government only had very vague long-term plans. It is essential that we have much shorter time-frames within the longer term plans so that specific and measurable action-plans are in place to ensure that real progress is being made. It is critical that the first of the interim targets is set so we can make a start as otherwise the incremental changes required will be too large and difficult to implement.

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

While everyone has an interest in the success of the Climate Change Commission, its goals and its work programme, the different component parts of the economy will require more targeted consideration and consultation - e.g. industrial manufacturing will raise quite different issues from forestry or agriculture, etc.

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

These are obvious primary goals for the Commission. It could have other functions such as sponsoring/encouraging research into how various industries or specific companies have successfully dealt with reducing their emissions, and developing and publicising best practice guidelines which others can adopt or follow. They could also provide or encourage others to provide a continuing series of seminars/workshops at which participants could hear from subject matter experts and exchange their experiences in dealing with relevant practices, techniques and technologies. They could also encourage various industry peer-groups (i.e. those in similar or closely related businesses) to work together on developing best practice approaches to climate change that are most relevant to them.

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

While the ultimate decision on the ETS and future variants should be made by Government, such decisions should be informed by the CCC and any deviation from their advice should be publicly addressed (i.e. Government would be required to explain why they have chosen to follow the CCC's advice).

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

The range of expertise set out in the discussion document looks fine to me. When in doubt, I should say that the British model has been working well for over a decade. The only obvious comment is that it is not necessary for all commissioners to have all of these attributes - provided that collectively they cover off the necessary skills and experience.

Clause

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

Position

Yes

Notes

Yes, though there may need to be other legislative change required. For example Local Government faces the risk of being sued if they DO ACT on Climate Change (e.g. because they have diminished the value of certain properties by declaring them flood prone) or if they DO NOT ACT (e.g. because they have failed to protect the very same properties from inundation caused by or exacerbated by Climate Change). Local Government requires legislative help to remove this risk (by making managed retreat mandatory rather than discretionary where there is identifiable risk) so they can get on with the job of managed retreat from areas which become more vulnerable as Climate Change effects grow in strength and frequency of occurrence.

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 could be a very long list, which may grow over time. Key is developing a National Climate Risk Assessment. Falling out of that will be an Adaption Programme to address the many specific issues. Because some of these will be very expensive to deal with there will have to be prioritisation to distinguish between those which are essential in the short term and those which can be deferred.

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

My main concern is that we have spent decades talking a lot about climate change and doing very little. Please move as quickly as possible on passing this legislation and establishing the new Climate Change Commission. Prominent British economist Nicholas Stern warned 22 years ago that if we delay too long then the scale of change required will not be achievable in a few short years, whereas if we start ASAP the large scale of change will be spread more comfortably over decades. If we had started then we would have had 44 years to mid-century and needed to reduce emissions by about 1.5% a year but now we have only 32 years and the required rate of change has jumped to 2.2% which I think will be very tough but achievable. In April I set this argument out in a letter to the editor which I attach below (also sent to James Shaw as Minister). Note that at that time I thought that the intention was to halve emissions by mid century - now the intention has ramped up to 100% (at least net) but I have doubts that this can be achieved in reality. From: Graeme Easte Subject: Climate change action not premature - urgent action long overdue Date: 23 April 2018 at 10:51:54 AM NZST To: letters@listener.co.nz Dear Sir, The new government's move from vague long-term targets for reducing carbon emissions to real action is criticized as premature by climate change deniers. On the contrary, after decades of procrastination, encouraged by the same deniers, the time for action has now become urgent. As top economist Nicholas Stern reported in 2006, the math's are actually fairly simple and easily understood - the sooner we begin cutting our emissions the less painful the process will be. But continuing to delay will eventually require a considerably faster rate of reduction. If we truly intend to halve carbon emissions by mid-century then we have 32 years left to achieve it. Spreading the reductions evenly over that period would require an average 2.1% cut each year - hard to achieve but possible. We blew our chance for an easier transition back in the 1990s when we could have had over 50 years in which to honour our Kyoto commitments with average annual cuts of less than 1.4%. But if we delay starting for another 5 years then the annual cuts required go up to 2.5% and a 10 year delay

pushes the rate up over 3%. Sustained cuts at these levels could well stall the economy. Yours faithfully, Graeme Easte 71a Martin Avenue, Mount Albert Email: Graeme@pastfinder.co.nz Phones: (09) 815-9000 or 027-209-7565 Postscript (not intended for publication): Some comparative numbers, based on the stated aim of halving our emissions by 2050 - if we had started actual reductions in: 1983 there would be 67 years - average annual reduction required = 1.0% 2000 there would be 50 years - average annual reduction required = 1.4% 2006 there would be 44 years - average annual reduction required = 1.5% 2012 there would be 38 years - average annual reduction required = 1.8% - if we start actual reductions in: 2018 there will be 32 years - average annual reduction required = 2.1% 2023 there would be 27 years - average annual reduction required = 2.5% 2028 there would be 22 years - average annual reduction required = 3.0% 2034 there would be 16 years - average annual reduction required = 4.0% 2036 there would be 14 years - average annual reduction required = 5.0% These figures are compounded year-on-year - much like compound interest in reverse. Cuts of more than 2.2-2.5% will be almost impossible to sustain year on year without "tanking" the economy - which is why we have literally run out of time and must make a start this year or acknowledge that the target of 50% will be not be achievable by mid-century but will have to be pushed out into the following decade (and possibly later if future governments slow things down.)