



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.

Publishing and releasing submissions

All or part of any written submission (including names of submitters) may be published on the Ministry for the Environment’s website, www.mfe.govt.nz. Unless you clearly specify otherwise in your submission, the Ministry will consider that you have consented to website posting of both your submission and your name.

Contents of submissions may be released to the public under the Official Information Act 1982 following requests to the Ministry for the Environment (including via email). Please advise if you have any objection to the release of any information contained in a submission, including commercially sensitive information, and in particular which part(s) you consider should be withheld, together with the reason(s) for withholding the information. We will take into account all such objections when responding to requests for copies of, and information on, submissions to this document under the Official Information Act.

The Privacy Act 1993 applies certain principles about the collection, use and disclosure of information about individuals by various agencies, including the Ministry for the Environment. It governs access by individuals to information about themselves held by agencies. Any personal information you supply to the Ministry in the course of making a submission will be used by the Ministry only in relation to the matters covered by this document. Please clearly indicate in your submission if you do not wish your name to be included in any summary of submissions that the Ministry may publish.

Personal / organisation details

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

Company name _____

Given names Anthony John _____

Surname Bradshaw _____

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

2050 is only 30 years away the economic impact of reaching a net zero target in this time could be significant.

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.

Optional comment

Given the complexity in measuring and reporting greenhouse gases it is probably best to start with one. As the science improves including other gases could be made.

3. How should New Zealand meet its targets?

Pick one:

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

Given climate change is a global issue and there is a global response New Zealand should be able to access (approved) international carbon units.

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

Pick one:

- yes
- no.

Optional comment

The science is still developing and flexibility is necessary.

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

5 years is a very short time for organisations and individuals to make any meaningful changes. 10 years would allow time for budgets to be achieved.

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

Optional comment

But should be 10 year time frame not 5 .

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

Yes and not just exceptional circumstances as the science developments there will be amendments necessary to reflect new understandings

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

There needs to be more detailed discussion and analysis so too early to say.

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
 no.

Optional comment

But over 10 years not 5.

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

More work/discussion needs to be done

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

Yes accountability is important but Government should be making the rules not the Climate Commission.

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

Allowing the parameters and therefore the price of ETs to be set by the commission will not provide sufficient accountability nor predictability. If ETs are to be used to determine the price of carbon in New Zealand then they need to be predicible/forecastable. The more certain the price is then the easier it will be for the economy to produce the required response. Price uncertainty is a major issue for ETs judging by the experience to date. By having government as the sole determinant changes are likely to be slower and more debated than a commission with sole power. There should be more debate as to whether ETs are the correct mechanism to drive change. Possibly a direct carbon tax may provide a mechanism. To plant a billion trees will need some radically different incentives from the current ETs model which has seen tree planting reductions over the last 15 years. The economics of forestry are very difficult due to their 25 year crop rotation and some mechanism needs to be established to reduce the risk to the forester and thereby encourage more planting.

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

Too early to say. Need to have framework more established.

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

No comment

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

X no.

Optional comment

Too early to say

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

X no.

Optional comment

Too early to say