

# Submission to Ministry for the Environment on the Zero Carbon Bill

Dr Rhys Jones  
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Tēnā koutou,

My name is Dr Rhys Jones and I am a Public Health Physician currently working as a Senior Lecturer in Māori Health at the University of Auckland. I am also Co-Convenor of OraTaiao: The New Zealand Climate and Health Council, an organisation representing over 600 health professionals that is supported by many of the leading health professional organisations in Aotearoa. This is my individual submission on the Zero Carbon Bill.

First I would like to affirm my support for the Zero Carbon Bill in principle. Setting in law a net zero emissions target is not only vital for NZ to play its part in the global response to climate change, it is also critical for the health and wellbeing of New Zealanders. Climate change is the greatest threat to global health we currently face, but tackling climate change represents possibly the greatest opportunity to improve health this century. The Zero Carbon Bill is therefore a crucial piece of legislation for our health and prosperity, now and into the future.

The primary role of the Zero Carbon Bill must be to ensure that New Zealand's actions are consistent with limiting global warming to less than 1.5°C. That has to be non-negotiable; anything beyond 1.5°C of warming represents an unacceptable risk of catastrophic outcomes for humanity. Therefore nothing in the Bill must compromise that goal: the Government must not seek to weaken targets or relax the rules based on what we believe is achievable or politically feasible. The global climate system does not care what we believe is achievable or politically feasible – the only thing that matters is limiting global warming to under 1.5°C. Put simply, that means NZ's emissions must peak by 2020 at the very latest and reduce rapidly to net zero within approximately 20 years (the exact target date will depend on our emissions reduction trajectory between now and then). The Zero Carbon Bill must be designed to deliver that outcome.

I have provided responses to the 16 discussion questions below. In summary, I am calling for a Zero Carbon Act that's fast, fair, firm and founded on Te Tiriti o Waitangi:

- The target must be net zero emissions, inclusive of **all** greenhouse gases, **by 2040**.
- This target must be **fully met by reducing domestic emissions** (and increasing sinks, e.g. through reforestation); i.e. purchasing credits **must not** be used as a way of reaching net zero emissions.
- The emissions budgets must cover **all gases and all sectors**, as NZ's main greenhouse gases (carbon dioxide, methane and nitrous oxide) all cause long-lasting damage.
- **The target should not be able to be weakened**, however there should be scope for future governments to strengthen the target in response to updated scientific evidence.
- **Three emissions budgets** of five (or six) years each need to be in place at any given time. These budgets are to be set by the Climate Change Commission.
- **Emissions budgets should not be able to be increased**, but there should be scope for them to be reduced.
- The **Government must respond** by publishing plans to stay within the emissions budget.
- The **Climate Change Commission** should set NZ's emissions budgets based on the most up-to-date climate science to stay within 1.5°C

- The Commission must include membership that reflects a partnership founded on Te Tiriti o Waitangi, and must draw on **expertise in health, equity and social change**.
- The Bill must **adhere to Te Tiriti o Waitangi**, consider health equity and the substantial health co-benefits from well-designed climate change mitigation

## Responses to the Ministry for Environment Zero Carbon Bill discussion questions:

### 2050 target

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

The government should set the target in law now, with the ability to make the target stronger in response to the Commission's early advice. The target should be based on the most up to date climate science, on our international obligations and on principles of global equity (New Zealand is a wealthy, high emitting country and thus has a greater responsibility than many other countries in relation to climate change mitigation).

#### *Comment:*

New Zealand is a signatory to the 2015 Paris Agreement, in which all countries committed to limiting average temperature rise to well below 2°C – and to pursue efforts to limit temperature increase to 1.5°C. Since then, the second draft of the IPCC Special Report on Global Warming of 1.5°C finds substantial differences in the harmful effects of global warming limited to 1.5°C compared to 2°C above pre-industrial levels.<sup>1</sup>

It is clear that the 0.5°C warming difference is critical for vulnerable regions.<sup>2</sup> Two degrees of warming would spell disaster for Pacific Island nations; for many, it could mean that their homelands become uninhabitable. To accept anything less stringent than a 1.5°C threshold would be a clear betrayal of our Pacific Island neighbours, which, in my view, is unconscionable.

Limiting global warming to 1.5°C will require global anthropogenic CO<sub>2</sub> emissions to reach net-zero before 2040, together with rapid reductions in other emissions, particularly methane.<sup>3</sup> Within these limits, we need to distribute efforts across countries fairly<sup>4,5,6</sup>

<sup>1</sup> Intergovernmental Panel on Climate Change. Special Report on Global Warming of 1.5°C (SR15), draft 2. <http://www.ipcc.ch/report/sr15/>, annotated Draft 2 Summary for Policy Makers <http://www.climatechangenews.com/2018/06/27/new-leaked-draft-of-un-1-5c-climate-report-in-full-and-annotated/>

<sup>2</sup> Schlessner C-F, Lissner TK, Fischer EM, Wohland J, Perrette M, et al. Differential climate impacts for policy relevant limits to global warming: the case of 1.5°C and 2°C. *Earth Syst. Dyn.* 2016;7(2):327-51. <https://www.earth-syst-dynam.net/7/327/2016/esd-7-327-2016.pdf>, <https://www.earth-syst-dynam.net/7/327/2016/esd-7-327-2016-discussion.html>, summary at [http://climateanalytics.org/files/2016\\_06\\_01\\_esd\\_schlessner\\_briefing\\_note.pdf](http://climateanalytics.org/files/2016_06_01_esd_schlessner_briefing_note.pdf)

<sup>3</sup> Intergovernmental Panel on Climate Change. Special Report on Global Warming of 1.5°C (SR15), draft 2. <http://www.ipcc.ch/report/sr15/>, annotated Draft 2 Summary for Policy Makers <http://www.climatechangenews.com/2018/06/27/new-leaked-draft-of-un-1-5c-climate-report-in-full-and-annotated/>

<sup>4</sup> Metcalfe S, for the New Zealand College of Public Health Medicine and OraTaiao: The New Zealand Climate and Health Council. Fast, fair climate action crucial for health and equity. *Editorial. N Z Med J* 2015;128(1425):14-23. [http://www.nzma.org.nz/\\_data/assets/pdf\\_file/0011/45929/Ed-Metcalfe-FINAL1425.pdf](http://www.nzma.org.nz/_data/assets/pdf_file/0011/45929/Ed-Metcalfe-FINAL1425.pdf)

<sup>5</sup> Due to previous inaction and delay (alongside inaction by other countries), New Zealand needs to work hard to meet our commitments under the Paris Agreement and make a fair contribution to limit warming below 1.5 degrees. The Paris Agreement included the principle of 'common but differentiated responsibilities and respective capabilities'. Least developed and developing nations are disproportionately affected by climate change, which they have not caused and have least capacity to adapt. Meanwhile, established economies, like New Zealand, historically have had high greenhouse gas emissions and have benefited from activities that cause high emissions; they are in a position, and have a responsibility, to mitigate past actions and contribute rapidly and proportionately more reductions than nations with historically lower emissions; established economies have greater economic capability to make the adjustments that are needed to reduce emissions.

<sup>6</sup> There are [many models and ways to share](#) emissions and efforts to get to net zero safely across countries that account for historical emissions and wealth. Such modelling, using frameworks like the [Climate Equity Reference Project](#) (we are wealthy and have benefited from large historic emissions), with 72+ 'fairness' scenarios, indicates general timelines for New Zealand of [year 2022 to 2038](#) to reach net zero emissions. This is based on both our historical responsibilities and obligations, and our capacity to adapt and mitigate, when compared with other countries. For content, rationale, sources, modelling

Distributing efforts fairly means countries like New Zealand – historically high per capita emitters with significant resources and capacity to mitigate – must take greater responsibility than many other countries. A detailed analysis undertaken to support the submission by OraTaiao (The NZ Climate and Health Council) indicates general timelines for New Zealand of between the years 2022 and 2038 to reach net zero emissions fairly.<sup>7</sup> While there is clearly variation depending on the model used and the assumptions made, the key point is that NZ must get to net zero emissions far more urgently than the proposed target date of 2050 in the Zero Carbon Bill.

It is important for the target to be set now, but also to allow flexibility to strengthen the target, if necessary, in response to the IPCC's Special Report on Global Warming of 1.5°C (due October 2018). NZ households, businesses, whānau, hapū, iwi, communities and the public sector need certainty and transparency to initiate decisive action now. However, the target must also be informed by updated scientific knowledge to remain consistent with an absolute maximum of 1.5°C global temperature rise.

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

Net zero emissions across all greenhouse gases by 2040, or earlier if the IPCC's October 2018 report provides evidence that global emissions need to be reduced faster.

### *Comment:*

What matters is total net emissions in our atmosphere and oceans – so we do not breach crucial ecological tipping points. As outlined above, we must not accept any response to climate change that allows the 1.5°C threshold to be breached.

Achieving this will require global anthropogenic CO<sub>2</sub> emissions to reach net-zero by 2040, together with rapid reductions in other emissions, particularly methane.<sup>8,9,10</sup> It is important to acknowledge that three of NZ's main greenhouse gases (carbon dioxide, nitrous oxide and methane) contribute to ongoing damage to our climate and/or oceans for hundreds of years or more.<sup>11</sup>

As described above, within these limits we need to distribute efforts across countries fairly.<sup>12</sup> That means NZ must act more urgently than the currently proposed settings. The Zero Carbon Bill target must therefore be brought forward – by 2050 NZ needs to be well into negative emissions. There must also be scope for the target in the final version of the Zero Carbon Act to be strengthened in light of the IPCC's Special 1.5°C report<sup>13</sup> due this October.

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assumptions, see 'Background to the NZCPHM's Stance on Setting National GHG Emissions Targets', joint editorial [Fast, fair climate action crucial for health and equity](#).

<sup>7</sup> Metcalfe S. Setting ambitious greenhouse gas emissions targets for New Zealand – the case for international fairness/equity. July 2018.

[https://d3n8a8pro7vhm.cloudfront.net/orataiao/pages/492/attachments/original/1531192915/Setting\\_ambitious\\_greenhouse\\_gas\\_emissions\\_targets\\_for\\_New\\_Zealand\\_-\\_the\\_case\\_for\\_international\\_fairness\\_equity.pdf?1531192915](https://d3n8a8pro7vhm.cloudfront.net/orataiao/pages/492/attachments/original/1531192915/Setting_ambitious_greenhouse_gas_emissions_targets_for_New_Zealand_-_the_case_for_international_fairness_equity.pdf?1531192915)

<sup>8</sup> Rockström J, Gaffney O, Rogelj J, Meinshausen M, Nakicenovic N, Schellnhuber HJ. A roadmap for rapid decarbonization. *Science*. 2017;355(6331):1269-71.

<http://science.sciencemag.org/content/355/6331/1269.full>

<sup>9</sup> <https://www.carbonbrief.org/mission-2020-new-global-strategy-rapidly-reduce-carbon-emissions>, [http://www.mission2020.global/wp-content/uploads/COP23\\_Mission-2020-Press-Release-NOV13.pdf](http://www.mission2020.global/wp-content/uploads/COP23_Mission-2020-Press-Release-NOV13.pdf), <http://www.mission2020.global/>

<sup>10</sup> Intergovernmental Panel on Climate Change. Special Report on Global Warming of 1.5°C (SR15), draft 2. <http://www.ipcc.ch/report/sr15/>, annotated Draft 2 Summary for Policy Makers <http://www.climatechangenews.com/2018/06/27/new-leaked-draft-of-un-1-5c-climate-report-in-full-and-annotated/>

<sup>11</sup> Zickfeld K, Solomon S, Gilford DM. Centuries of thermal sea-level rise due to anthropogenic emissions of short-lived greenhouse gases. *Proc Natl Acad Sci U S A*. 2017;114(4):657-62. <http://www.pnas.org/content/pnas/early/2017/01/03/1612066114.full.pdf>

<sup>12</sup> Metcalfe S, for the New Zealand College of Public Health Medicine and OraTaiao: The New Zealand Climate and Health Council. Fast, fair climate action crucial for health and equity. Editorial. *N Z Med J* 2015;128(1425):14-23. [http://www.nzma.org.nz/\\_data/assets/pdf\\_file/0011/45929/Ed-Metcalfe-FINAL1425.pdf](http://www.nzma.org.nz/_data/assets/pdf_file/0011/45929/Ed-Metcalfe-FINAL1425.pdf)

<sup>13</sup> Intergovernmental Panel on Climate Change. Special Report on Global Warming of 1.5°C (SR15), draft 2. <http://www.ipcc.ch/report/sr15/>, annotated Draft 2 Summary for Policy Makers <http://www.climatechangenews.com/2018/06/27/new-leaked-draft-of-un-1-5c-climate-report-in-full-and-annotated/>

### 3. How should New Zealand meet its targets?

Domestic net emissions reductions only (including from reforestation, horticultural planting and improved soil health).

*Comment:*

The responsibility NZ has as a wealthy, historically high emitting nation means taking responsibility for actually reducing emissions, not outsourcing climate change mitigation to other countries as we have historically sought to do. Relying on purchasing international emissions units will undermine decisive domestic action and investment, particularly as those units will be volatile in price.

Relying on international tradeable emissions units also means NZ will miss out on the enormous co-benefits of reducing our domestic emissions, including significant opportunities for improving health and equity. This approach means delaying genuine action until later, when it is likely to be poorly planned and rapidly executed, with fewer co-benefits and greater likelihood for negative unintended consequences than well thought out plans commencing now.

Reforestation, horticultural planting and improved soil health (which will absorb some of New Zealand's carbon dioxide emissions), can be part of meeting our domestic net zero emissions target. But our main focus must be rapidly reducing NZ's greenhouse gas emissions – all gases, all sectors, no exceptions.

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

The Bill must only allow the target to be altered to increase climate action ambition in response to updated scientific recommendations. There must be no backsliding (i.e. weakening of the target).

*Comment:*

A key recommendation from the Productivity Commission's draft report (April 2018)<sup>14</sup> was the importance of long term climate policy commitments through institutional, including statutory legal and regulatory, structures and processes. This is imperative in ensuring that NZ households, businesses, whānau, hapū, iwi, communities and the public sector have the certainty required to initiate decisive action now. This certainty will be undermined if there is flexibility to relax the target in response to changing social, political or economic conditions. However there must be scope for the target to be strengthened in response to changing scientific recommendations.

In truly exceptional circumstances it would be possible for the Act to be amended or repealed using due political process. Such a change should require a rigorous Parliamentary process, as it is highly questionable that any foreseeable 'exceptional circumstances' could justify weakening climate action.

## 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?

Yes.

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<sup>14</sup> New Zealand Productivity Commission. Low-emissions economy: Draft report. Wellington: NZPC, 2018. [www.productivity.govt.nz/inquiry-content/3254](http://www.productivity.govt.nz/inquiry-content/3254)

*Comment:*

Three 5-year (or possibly 6-year) emissions budgets, with the “legislated net zero emissions by 2040 target”, gives New Zealand the certainty needed for action and investment now.

Given the urgent need for global emissions to peak by 2020,<sup>15,16</sup> the Act could also include the requirement for the Commission to urgently set an initial 2-year emissions budget. This 2-year Budget would fit within the first 5-year (or 6-year) emissions budget.

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

The last budget should be able to be reduced if needed to respond to emerging international evidence.

*Comment:*

In much the same way as the target should be able to be strengthened in light of emerging scientific recommendations, the last budget should be able to be reduced if needed. However, emissions budgets should not be able to be increased, unless the Government changes the Act through the usual Parliamentary process. It is assumed that the Zero Carbon Act will be permissive of any Government taking action so that NZ can emit less than budgeted.

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

The second budget should be able to be reduced if needed to respond to emerging international evidence.

*Comment:*

As per the last budget, the second budget should be able to be reduced if needed based on emerging scientific evidence. Similarly, the budget should not be able to be increased.

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?

No.

*Comment:*

Emissions budgets must be determined solely on the basis of scientific evidence and principles of international equity. The bottom line is what ends up in our shared global atmosphere and oceans, and making sure ecological tipping points are not breached. So emissions budgets cannot be subject to domestic considerations – they must be purely informed by what NZ needs to do as part of a 1.5°C-consistent response.

As the impacts of unmitigated climate change will be highly regressive on New Zealanders the priority must be robust emissions budgets. While the question of *how* we stay within emissions

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<sup>15</sup> Schaeffer M, Rogeli J, Roming N, Sferra F, Hare B, et al; for Climate Analytics. Feasibility of limiting warming to below 1.5°C. 2015. [http://climateanalytics.org/files/feasibility\\_1o5c\\_2c.pdf](http://climateanalytics.org/files/feasibility_1o5c_2c.pdf); Climate Analytics. Input to the Talanoa Dialogue from Climate Analytics, April 2018. [http://climateanalytics.org/files/ca\\_input\\_talanoa\\_dialogue\\_april\\_2018\\_final.pdf](http://climateanalytics.org/files/ca_input_talanoa_dialogue_april_2018_final.pdf)

<sup>16</sup> <https://www.carbonbrief.org/mission-2020-new-global-strategy-rapidly-reduce-carbon-emissions>, [http://www.mission2020.global/wp-content/uploads/COP23\\_Mission-2020-Press-Release-NOV13.pdf](http://www.mission2020.global/wp-content/uploads/COP23_Mission-2020-Press-Release-NOV13.pdf), <http://www.mission2020.global/>

budgets must be strongly shaped by domestic considerations such as social equity, the question of *what* those budgets are has to be informed solely by scientific evidence and international fair-shares.

The Commission should advise the Government on mitigation policies (including ETS settings) to inform the Government's plans to keep NZ's future emissions within budget. Te Tiriti o Waitangi obligations and fairness within New Zealand are top priorities for policy and planning. Other considerations include the substantial health co-benefits from well-designed climate action – to ensure a fairer, more sustainable and more resilient Aotearoa.

## Government response

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

Yes.

### *Comment:*

The Zero Carbon Act must require the Government to respond by publishing plans to stay within budget as rapidly as feasible within a set time limit that is certainly less than 12 months.

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?

The most important issues to consider are Te Tiriti o Waitangi obligations and fairness within Aotearoa. This means health equity<sup>17</sup> is essential in planning and monitoring – all regressive policies (including ETS settings) must be effectively offset to ensure that vulnerable communities are not disproportionately impacted.

The substantial co-benefits to health<sup>18</sup> from well-designed reduction and mitigation must be considered. Other considerations include sustainable economic opportunities and technology relevant to climate change, to ensure a fairer, more sustainable and more resilient Aotearoa.

The Zero Carbon Bill must be founded on a Te Tiriti o Waitangi framework, and must represent a partnership with tāngata whenua at all levels. It must also ensure participation of NZ's most vulnerable communities (those already disadvantaged and those working in industries threatened by climate change mitigation), to create a more equitable future.

### *Comment:*

We must strive to reduce inequalities between Māori and other New Zealanders, and value the concepts of kaitiakitanga (guardianship), aroha (love/compassion), manaakitanga (caring), whakatipuranga (future generations), hauora (health and wellbeing), and tika (integrity/doing what's right).

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<sup>17</sup> Marmot M, Friel S, Bell R, Houweling TA, Taylor S. Commission on Social Determinants of Health. Closing the gap in a generation: health equity through action on the social determinants of health. Lancet. 2008;372(9650):1661-9. <http://www.sciencedirect.com/science/article/pii/S0140673608616906>; New Zealand College of Public Health Medicine / New Zealand Medical Association. NZCPHM Policy Statement on Health Equity (adopting the NZMA Position Statement on Health Equity 2011). Wellington: NZCPHM, 2016.

[https://www.nzcpmh.org.nz/media/58923/2016\\_11\\_17\\_nzcpmh\\_health\\_equity\\_policy\\_statement.pdf](https://www.nzcpmh.org.nz/media/58923/2016_11_17_nzcpmh_health_equity_policy_statement.pdf)

<sup>18</sup> Wang H, Horton R. Tackling climate change: the greatest opportunity for global health. Lancet. 2015;386(10006):1798-9. <https://www.thelancet.com/climate-and-health/2015>

The direct and indirect health effects of climate change will have a greater impact on those already suffering from disadvantage and poorer health in New Zealand – children, elderly, low-income, Māori and Pacific populations, and people living with disabilities, acute or chronic illnesses.

Mitigation strategies must therefore contribute to achieving equity by improving outcomes for Māori and other groups experiencing disadvantage and discrimination. The Zero Carbon Bill is an extremely far-reaching piece of legislation – it has serious implications for every sector of the economy for decades to come. It sets in law a process of fundamental social and economic transformation. If Māori are not at the table in a partnership arrangement founded on Te Tiriti o Waitangi, those who are already privileged will capture the benefits of this transformation. The grossly inequitable business-as-usual will prevail, with Māori disadvantage exacerbated and Pākehā privilege further entrenched. Given the scope of the Bill, which is bordering on constitutional, a framework based on colonialism and re-entrenchment of institutional racism must not be allowed.

Climate action that prioritises health equity has significant potential to reduce existing, and prevent future health inequities (e.g. retrofitting insulation to make homes warm and dry can reduce childhood asthma and chest infections – as leading causes of hospital admissions, particularly for Māori and Pacific children). The financial costs of climate change responses can be offset by the cost-savings of health co-benefits. For example, health benefits from zero-carbon public and active transport include increased physical activity, improved social connections and more equitable access to education and employment. This has significant implications for the types of expertise required by the Climate Change Commission.

## **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?

Yes, but fundamentally the Commission must independently set NZ's emissions budgets – like the Reserve Bank independently sets NZ's Official Cash Rate.

### *Comment:*

The Commission can also advise on how NZ stays within these budgets and how it can best adapt to climate change, and monitor progress on NZ's emissions reductions.

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

The Commission should advise the Government on ETS policy settings so that New Zealand's emissions stay within the budgets set.

### *Comment:*

The Commission must also identify the extent of regressive impacts from proposed ETS settings, and propose effective complementary policies which fairly compensate vulnerable households.

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?

Yes, but other expertise amongst Commissioners and staffing is also needed – including expertise in health and equity. It is also essential that the Commission is founded on partnership with tāngata whenua and upholds obligations under Te Tiriti o Waitangi.

*Comment:*

I recommend a larger pool of Climate Commissioners so that Commissioners can be called in according to the focus area – for example, adaptation policy recommendations would require the oversight of Commissioners with expertise in Te Tiriti o Waitangi as well as local government, community and adaptation experience.

In addition to climate science, a number of other areas are high priority for expertise among Commissioners, including mātauranga Māori, Te Tiriti o Waitangi, te reo me ōna tikanga Māori and Māori development. Health expertise must also be included, as well as expertise in social change. The Commissioners should include sector experts, with a high level of standing in society. It is fundamentally important that *all* Commissioners have equity expertise, and that equity issues are not marginalised in the Commission’s processes. If any of the Commissioners lack expertise in equity they will tend to perpetuate the inequitable status quo and undermine pro-equity actions – a situation that cannot be allowed to happen.

It is also important that vested interests are not part of the Commission, particularly those with a financial interest in maintaining the health-harming status quo. In the health sector, for example, there have been too many crucial policy processes derailed by those who have a financial stake in continuing to do harm.

## **Adapting to the impacts of climate change**

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

Yes.

*Comment:*

Adaptation must be a separate advisory work stream, to avoid overtaking the Commission’s main priority which is climate change mitigation.

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

Yes.

*Comment:*

I support the following adaptation provisions (which include the health sector):

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

Mitigation and adaptation are often deeply interlinked – so often mitigation and adaptation can be addressed together in the same policy (e.g. housing). But care must be taken in designing adaptation policies to ensure that climate-damaging emissions are not increased.

Adaptation must be dealt with by a separate working group, to avoid distraction from the main priority of mitigation.

In relation to health, an adaptation plan must be put in place that covers both health sector adaptation and health-protecting adaptation in other sectors.

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?

Yes.

*Comment:*

A targeted adaptation reporting power could start with voluntary reporting in the first year, and require compulsory reporting in subsequent years.

Thank you very much for the opportunity to make this submission.

Nāku noa, nā

Dr Rhys Jones, MBChB MPH FNZCPHM