Dear Madam / Sir

**Submission on the Zero Carbon Bill from Stephen McLuckie**

This is our chance. I’m excited to be submitting on the Zero Carbon Bill because I strongly support the immediate creation of a bold and robust Zero Carbon Act that will commit future NZ governments to meaningful and decisive action on climate change. I implore you to draft bold legislation that will implement a Zero Carbon Act that will include all greenhouse gases including methane. I would also suggest taking a more ambitious approach and aiming for carbon zero by 2040. The science is clear on this and we need to be guided by it in the formation of policy. I tautoko Generation Zero’s suggestion of embedding core principles into the Act particularly the principle of fairness. New Zealand should meet Zero Carbon Act commitments through domestic emissions reductions only. International carbon units have been shown to be fairly dodgy previously. Such practices are also disingenuous when we should be concentrating on a meaningful transition.

The Zero Carbon Bill target should only ever be revised in exceptional circumstances and were this ever to be the case any changes should be guided by increases in scientific knowledge/changes in International law in this area and certainly not guided by economic factors. The Act by design needs to convey certainty.

With regard to adaption, this should definitely be covered in the Zero Carbon Act. In addition I would like to see the Government prepare a National Climate Risk Assessment. Following from this the Government must produce an Adaptation Programme to address the climate risks identified in any National Climate Risk Assessment.

**2050 target**

Q1. What process should the Government use to set a new emissions reduction target in legislation? (In legislation now, or later via the Climate Commission?)

The Zero Carbon Act should set a 2050 target in law now. A safe climate future is too important to wait.

Q2. Which is the best 2050 target for New Zealand? (Which emissions should be covered and how?)

We need the most ambitious target: net zero emissions across all greenhouse gases, not just some.

However, even if the government is unable to set a target across all gases, it should set a target of net zero long-lived gases by 2050 and mandate the Climate Commission to recommend or set a 2050 target for short-lived gases.

The other options suggested, like merely aiming to stabilise short-lived gases or ignoring them altogether would both undercut the ‘zero’ part of the Zero Carbon Act and risks international criticism.

Q3. How should New Zealand meet its targets? (Within New Zealand, or with international trading too?)

By cutting emissions here (including by planting more forests) in New Zealand, not by buying overseas credits. Zero should mean zero.

Q4. Should the Zero Carbon Bill allow the 2050 target to be revised if circumstances change?

The 2050 target should not be able to be weakened, but only strengthened. This ‘no backsliding’ approach is consistent with the spirit of the Paris Agreement.

**Emissions budgets**

Q5. 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?

Yes. Emissions budgets under the Zero Carbon Act should cover five year periods and be set three budgets in advance. This will provide long-term certainty.

Q6. Should the Government be able to alter the last emissions budget (i.e. furthest into the future)?

No. Emissions budgets should be only be changed due to major changes in scientific understanding, not political or economic developments. The same ‘no backsliding’ principle should apply as for the 2050 target.

Q7. Should the Government have the ability to review and adjust the second emissions budget within a specific range under exceptional circumstances?

No, for the same reasons as in my answer to Q6.

Q8. Do you agree with the proposed considerations that the Government and the Climate Commission will need to
take into account when advising on and setting budgets?

Yes, I agree that they will need to consider:
- scientific knowledge regarding climate change
- technology relevant to climate change
- social circumstances and the likely impact of a decision on fuel poverty
- energy policy and the likely impact of a decision on energy supplies and the carbon and energy intensity of the economy
- economic circumstances and the likely impact of a decision on the economy, as well as the competitiveness of particular sectors of the economy
- fiscal circumstances and the likely impact of the decision on taxation, public spending and public borrowing

**Government response**

Q9. Should the Zero Carbon Bill require Governments to set out plans within a certain timeframe to achieve the emissions budgets?

Yes, the Act should set fixed deadlines, so we don't repeat the mistakes of the UK Climate Change Act 2008, which didn't include deadlines for making these plans.

Q10. 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?

In setting plans to meet the emissions budgets, the government should be:
- making sure they're based on the best science available
- ensuring that they deliver fair outcomes for Kiwis
- reflecting the principle of a Just Transition for workers
- honouring Te Tiriti o Waitangi
- being environmentally sustainable, especially for New Zealand's unique native plants and animals
- maximising the impact of money spent and being cost-effective
- encouraging innovation
- unlocking economic opportunities for New Zealanders, such as in renewable energy
- honouring our international commitments, including under the Paris Agreement
- consulting people who may be economically affected, like farmers or businesses
- consulting tangata whenua
- consulting young people, who'll live to see more of the impact of climate change
- consulting communities already facing the physical impacts of climate change

**Climate Change Commission**

Q11. 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, I do. The Commission should provide expert independent advice, but not be a decision-maker.

Q12. What role do you think the Climate Change Commission should have in relation to the New Zealand Emissions Trading Scheme (NZ ETS)? (Should it provide advice, or make decisions too?)

The Commission should advise the government on policy around the New Zealand Emissions Trading Scheme.

Q13. 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?

I agree that members of the Climate Commission should have expertise in:
- climate and environmental science including mātauranga Māori
- climate change policy (including emissions trading)
- te Tiriti o Waitangi, te reo me ona tikanga Māori (Māori language, culture, and philosophy) and Māori interests
- knowledge of the public and private innovation and technology development system
- risk management
- resource economics and impacts (including labour markets and distribution)
- experience with addressing adaptation challenges like planning, insurance and local government
- engineering and/or infrastructure
- community engagement and communications
- business competitiveness

In addition, they should have expertise in:
- expertise in public health
- understanding of our international commitments, including under the Paris Agreement
- understanding of the social impacts of climate change and/or government policy
- knowledge of principles of equity and a Just Transition

**Adapting to the impact of climate change**

Q14. Do you think the Zero Carbon Bill should cover adapting to climate change?
Yes. There might need to be a separate adaptation sub-committee of the Commission, as in the UK.

Q15. The Government has proposed a number of new functions to help us adapt to climate change. Do you agree with the proposed functions?

Yes, the Zero Carbon Act should require:

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

Care will need to be taken in managing the interaction between national and local government roles.

Q16. Should the Government explore setting up a targeted adaptation reporting power that could see some organisations share information on their exposure to climate change risks?

Yes. This would let the government and the public know about the risks to public and other infrastructure, and make these organisations better informed about the risks they face.

**An extra point to consider - climate finance**

The Zero Carbon Act should also provide a framework for transparency and accountability around New Zealand's international climate finance.

**Conclusion**

Thank you for the chance to submit on the Zero Carbon Bill. I'm excited to have the chance to contribute to maximising its impact. Together, it's possible to unlock a safe climate future for all Kiwis.

Yours faithfully

Stephen McLuckie