



# Submissions form Jim Green

We seek your feedback on the specific proposals in the Zero Carbon Bill.

Either email this submission to [ZCB.Submissions@mfe.govt.nz](mailto: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)*

Company name Not applicable - Personal submission

Given names D J (Jim)

Surname Green

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Submitter type, pick one:

- Individual
- NGO
- Business / Industry
- Local Government
- Central Government
- Iwi / Māori
- University
- Research Institute
- School
- Community Group
- Unspecified / Other

## Submission:

### 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**

We need to nail something to the masthead asap!

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

Pick one:

- net zero long-lived gases and stabilised short-lived gases:** Long-lived gases to net zero by 2050, while also stabilising short-lived gases

**Optional comment**

Short-lived gases need to be on the table now. Otherwise, their exclusion would look like a convenience to protect the farming sector. Addressing climate change needs to be owned by everyone.

3. How should New Zealand meet its targets?

Pick one:

- 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**

I see no inherent difference between trading carbon credits and trading commodities. Surely climate control is better served by food being produced in a country with more climate friendly production, with carbon credits from, say, tree planting in other countries – playing to each other’s strengths. Yes, carbon trading has had a bad history, but we should fix it rather than dump it. I think the core criteria for carbon credits are:

- integrity of the system, and
- consideration of longer-term sustainability (*though carbon credits should not be precluded as a bridging solution*).

*(Note: there is comment in the section “International carbon markets” suggesting international carbon credits should be seen only as a transitional measure. I do not see the rationale for this focus.)*

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

Pick one:

- no. But neither should the Bill prevent it.

**Optional comment**

We need to remain open to continuing developments in understanding climate change, controlling the causes, and mitigation techniques – so there needs to be a way to change the target.

The ability to **amend the Bill through the normal Government process** should therefore remain. This would maintain an appropriate balance between commitment and responding to as-yet unknown developments, and be more transparent and consultative.

## 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**

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

Pick one:

- yes, the third emissions budget should be able to be changed, but only when the subsequent budget is set

**Optional comment**

The independent Commission should be involved in the process.

*(Note: I have no strong view, other than that overseas experience should be guiding our legislation.)*

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

**Optional comment**

The independent Commission should be involved in the process.

*(Note: I have no strong view, other than that overseas experience should be guiding our legislation.)*

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**

The list seems to be missing “progress towards our current and possible future climate change commitments”.

Also, the list seemingly focuses on the short-term rather than long term impacts of the listed factors.

## 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**

I can think of no reason why not!

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**

In addition to the list from the British legislation, I think the plans should:

- provide a vision (even if rather hazy) beyond 10 – 15 years: what should I be thinking about when I build my new home, develop my farm, or start a new business?
- address how progress is to be monitored;
- place a strong emphasis on supporting vulnerable communities and sectors, to ensure a just transition. We're all in this together. We need a holistic approach to what's best for the country, and then a process to share gains and losses.

## 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**

The suggested functions seem appropriate.

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**

I have no strong view, though it does seem to split accountabilities if Government sets the Budget and Plan but does not have responsibility for setting the ETS limit.

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**

I don't feel I can add value here!

## 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 needs to be addressed, and the Zero Carbon Bill seems the logical place in which to specify the powers, accountabilities, etc that will be needed.

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 presume the functions referred to are:

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

**In addition to this list**, might it be appropriate to add:

- Recommendations on amendments required to other legislation.

Development of the adaptation plan seems to be rather understated. I think it will be a major task, requiring substantial input especially from local authorities. I think it's functions and stakeholders will be sufficiently different from those of the Commission that it should be a separate body, which means it could possibly be initiated before the Commission is functioning.

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**

How acceptable the requirements are will depend on how extensive they are and the nature of them – a question for the stakeholders!

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