



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.

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Personal / organisation details

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

Company name _____

Given names Madeline_____

Surname Hall_____

Submitter type, pick one:

- Individual (please note I have submitted a quick submission but this is a more through one. Please replace my original tick box submission with this one)**
- 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.

Setting the target in legislation to provide a clear signal to all stakeholders that there is political consensus and stability is paramount. However, it would be valuable to ask the Commission for expert advice on the target level for short-lived greenhouse gases within the overarching net zero target as well as the role of forestry as a form of biological offset.

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.***

We must aim for the most ambitious option. Time and history has proven that New Zealand is capable of radical change when people set their minds to it. Using a 'two baskets approach' to short and long lived greenhouse gases is a great option for now. This may not be the case in the future when/if the science changes. Basing a decision on

the current understanding of short/long lived emissions could lock us into a pathway that is not as ambitious (nor as impactful) as it could be. For now, a focus on stabilising short lived emissions and achieving negative long-lived emissions will be important. Clarifying how forestry offsets fit into this strategy now will help provide certainty into the future. Relying on signals within the ETS to guide carbon forestry investment is not enough. Additionally, asking stakeholders about when forests will no longer be offset options (due to social pressures or international flack) will be important. Clarity on what focus on 'net' vs. 'gross' emissions we want to have going forward will also be needed. I agree with Generation Zero's comment that New Zealand's climate change response should focus on gross emission reductions, particularly in the 2020s and 2030s.

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.**

Focusing of what components of our emissions profile we will be offsetting via domestic units or international units (and when) would be ideal. In addition, we will need to consider whether other countries would like to trade with us, given our focus on net emissions reductions using forestry offsets. In addition to environmental safeguards, other aspects of unit integrity should be considered. This could relate to the protection of human rights, respect for biological heritage, and trade implications. A focus on reducing our gross emissions in the 2020s and 2030s and then a transition to using international units later on could be a good pathway forward.

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

Pick one:

- yes**
- no.

The 2050 target should only be revised following a significant change in scientific knowledge or international law (such as the Paris Agreement becoming more ambitious). Any revision should require input from the Climate Change Commission and approval by Parliament.

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.

This budget setting requires clear cross party agreement in order to be progressed.

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.***

No. Budgets should only be revised in exceptional circumstances. It is not appropriate for a new government to 'have a say' on an upcoming budget which has already been set. If this proposal was included, certainty and stability would be greatly compromised.

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.

Under exceptional circumstances, yes. For example, it might be appropriate to change an upcoming budget after an extreme natural disaster (such as a major earthquake). Any revision should require input from the Climate Change Commission and approval by Parliament.

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.

Yes, the considerations noted are important. Social circumstances of rural communities will also need to be considered. In all, the emission budget must be consistent with a fair, cost-effective, environmentally sustainable pathway to the 2050 target.

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.

This is one of the most important components of the ZCB in my mind. These plans should be in plain English as well as detailed for the policy wonks among us. These plans should fit certain criteria established by the Climate Commission.

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?

Budgets should be developed with as many affected stakeholders as possible. They are a way to test assumptions and get people on board. At present, many within the rural community are left out of climate conversations and although industry bodies like DairyNZ, Beef and Lamb NZ, and Apples and Pears New Zealand are doing some work, more will need to be done.

Government (central and regional) will need to work with both industry representatives as well as local communities to develop budgets. Regional aspirations will also need to be considered. For example, the current strategic plan for the Hawke's Bay Regional Council includes a goal of carbon neutrality by 2040. Aligning budgets across different levels of government and across the country will be important.

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.

In addition to advising and monitoring, I suggest the Climate Change commission also has a community engagement focus. It is an independent body that can offer guidance and materials for a number of groups and rely on the most up to date research on best ways to engage with communities on climate resilience, mitigation, and adaptation. It should also release a report card of different region's progress and why this is the case.

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.

I know how complicated and ridiculous the scheme can get and how easy it is for a given government to use (or mis-use) the ETS. However, a commission with decision-making powers would have a conflict of interest in holding itself to account over its own policy decisions.

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.

I also think there should be expertise in rural communities, biological emissions, and farming systems. I think that additional expertise in international context of climate innovation and low emissions transitions is also important. The person/people with experience with community engagement communications will be especially important.

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

Adaptation in New Zealand has only mostly focused in coastal hazards to date. Although plenty of research has been done on adaptation in order respects (like pastoral farming) very little of this work has actually made its way into the public domain. I like the need for the right tools “for decision-makers [to] help us consider the risks to the whole of society and the economy.” However, some of the tools we already have are not the best for the job and some of the systems these tools must operate in are insufficient. It will take some substantive work to not only create a national adaptation plan but to assess what barriers (legislative or otherwise) exist to implementing it fully. The roles and responsibilities of regional and local councils will especially need to be investigated along with their capability and capacity to do any resulting work.

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
- no.

I support the Government being required to prepare a national climate risk assessment, and a national policy plan to address these risks. I also encourage them to review other pieces of legislation that can impact on Climate change action, like the Local Govt Act or the RMA.

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
- no.

Introducing a mandatory adaptation reporting power will be good but the capacity and capability of different bodies to support this work needs to be assessed and improved.