

Your submission to Zero Carbon Bill

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Submitter Type: Individual

Clause

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

Position

The Government sets a 2050 target in legislation now

Notes

This underlines a strong commitment across party lines, and gives a strong signal of future intent.

Clause

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

Position

Net Zero Emissions - Net zero emissions across all greenhouse gases by 2050

Notes

This is the most effective target in taking real climate action, and ensures a coordinated approach across industry to lower all GG emissions.

Clause

3. How should New Zealand meet its targets?

Position

Domestic emissions reductions only (including from new forest planting)

Notes

There is a danger of Emissions Trading being used as a get-out of taking appropriately ambitious action to achieve the 2050 target. It may reduce the emphasis on innovation and investment in domestic infrastructure to achieve the reductions we need, potentially resulting in higher overall costs due to delayed action. This needs to be properly considered against the possibility of higher investment costs if NZ is an early adopter of green technologies. Additionally, the price of carbon units will fluctuate as international interest in the carbon trading market grows. This means NZ would have less certainty over long term budgeting, and may find that reliance on carbon trading becomes an inefficient investment. While the criteria outlined in the proposal are sensible, there are challenges in seeing these through into practice, as acknowledged in the proposal with the Kyoto example. Even with strong safeguards in place, it may be difficult to guarantee that emissions reductions purchased internationally will deliver the required reductions in practice. New forest planting should prioritise the planting of native species in mixed forest stands, to gain maximum ecosystem benefits, and support conservation efforts.

Clause

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

Position

No

Notes

The only revisions allowed should be to achieve a more ambitious target or timeframe, particularly in light of new scientific evidence. Net zero carbon by 2050 should be non-negotiable. Having the ability to revise the target leaves it open to political influence, and removes some of the certainty for industry which is a major strength of the proposal, allowing a well planned and managed transition. The long term impact of climate change needs to be put before short term political influences.

Clause

5. 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?

Position

Yes

Notes

This proposal helps to provide certainty and allows the government, industry and individuals to plan for the long term, facilitating a well managed transition and adaptation to a net zero carbon economy. I do NOT agree with the idea of lining up budgets to the electoral cycle (the 6 year budget with a 3 yearly review) - this allows too much influence for party politics on something that is a cross-party issue. These should be accompanied by an equivalent term strategy and policies stating how the budget will be met. The budget approach is sensible, but will only be effective if there is line of sight through to practical real time planning and action at the national, regional and local levels to deliver the required changes, as well as providing real time feedback on what is working and

where there are challenges.

Clause

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

Position

No - emissions budgets should not be able to be changed

Notes

Unless in response to changing scientific evidence or to make the budget more ambitious. Allowing budgets to be changed negates the aims of providing certainty to industry and a well planned transition.

Clause

7. Should the Government have the ability to review and adjust the second emissions budget within a specific range under exceptional circumstances? See p36 Our Climate Your Say

Notes

Unless in response to changing scientific evidence or to make the budget more ambitious. Allowing budgets to be changed negates the aims of providing certainty to industry and a well planned transition.

Clause

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? See p44 Our Climate Your Say

Position

Yes

Notes

Clause

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

Position

Yes

Notes

Yes, budgets should be accompanied by an equivalent term strategy and policies stating how the budget will be met, with clear timebound plans on how these strategies will be realised, supported by adequate resources. The budget approach is sensible, but will only be effective if there is line of sight through to practical real time planning and action at the national, regional and local levels to deliver the required changes, as well as providing real time feedback on what is working and where there are challenges.

Clause

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?

Notes

That the proposed plans will actually deliver the 5 year budget and move us on track to achieving the 2050 target. We need proper check and balances and reality checks throughout, with real time feedback loops on how effective carbon reductions actions are in practice. This requires meaningful engagement with industry, but also with local councils, NGOs and community bodies to assess intended and unintended consequences, support innovation by bringing together different perspectives and reducing perception gaps (e.g. perceived rural/urban divide..)

Clause

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? See p42 Our Climate Your Say

Position

Yes

Notes

Providing the CCC with independence from political influence is absolutely the right approach. The CCC needs to be properly set up to hold the Government to account on its performance against the specific budgets, strategies and plans in place to deliver net zero carbon by 2050, as well as the overall target itself. This includes ensuring sufficient air time and influence with Government and industry, appropriate funding and governance framework, and the right expertise and access to data and intelligence - including being able to draw on wider expertise where necessary, which may include the international community. Government should be legally required to consult the CCC and provide an explanation where it does not follow CCC advice.

Clause

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

Position

Advising the Government on policy settings in the NZ ETS

Notes

The 'middle' advisory option is the right one, but to be effective the CCC must be equipped to hold the Government to account. This

must be embedded in legislation, policy and governance to provide appropriate safeguards into the future that the CCC will continue to be an influential body. Government should be legally required to consult the CCC and provide an explanation where it does not follow CCC advice.

Clause

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? See p45 Our Climate Your Say

Position

Yes

Notes

Yes the proposed capability makes sense - but may benefit from also having a social impact perspective. It CCC should also be able to draw on wider expertise where necessary, which may include the international community.

Clause

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

Position

Yes

Notes

Yes, this is the responsible and socially just thing to do, and allows the proper targeting of efforts and resources to mitigate and adapt to the impacts of climate change.

Clause

15. The Government has proposed a number of new functions to help us adapt to climate change. Do you agree with the proposed functions? See p47 Our Climate Your Say

Position

Yes

Notes

The role of local/regional councils is particularly important in this area, and these bodies will need to be fully involved in planning and actions to mitigate/adapt, in consultation with community groups. This includes empowering and ensuring proper funding for these bodies to find meaningful, long term solutions. This should be accompanied by checks and balances to ensure councils are held to account for delivering these plans, as well as central Government. The national plan ensures coordination between these efforts and a total view of actions underway and the cumulative impacts (progress towards targets) and it makes sense for this sit with government, but reviewed and monitored by the CCC.

Clause

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?

Position

Yes

Notes

This would support industry and shareholder driven action, and would give a better picture of the true cost of productions by including 'externalities'. It also allows better consumer choice, as environmentally conscious consumers can choose to purchase from companies who are taking responsible action.

Clause

Do you have any other comments you'd like to make?

Notes

This is a welcome proposal - thank you. We need to stay strong on the intent of the proposal all the way through to legislation, and avoid any watering down of the ideas put forward. To help with this, communications need to be clearer on the cost of doing nothing and have this as a relative comparison - this doesn't come through strongly enough in the cost/benefit analysis and statements.