



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 Rhys James _____

Surname Burns _____

Submitter type, pick one:

- Individual**
- 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.

In my view the goal needs to be enshrined in legislation to have any chance of being met. Otherwise the goal will be ignored, moved into the future or modified by future governments, local government, businesses etc.

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.

This is our one chance to show courage and global leadership, so in my view we need to aim for the highest result. Only net zero emissions can get us to where we need to be for a sustainable future. This will be very challenging to meet but

will provide the political and economic jolt to show how serious this issue is and will promote innovation to achieve the goal.

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.

The ETS was a first attempt at constraining our carbon output but was undermined by acceptance of overseas credits of uncertain quality. There is every chance that this could happen again, so the Bill should be as strong as possible to show that NZ itself can operate in a net carbon zero environment and doesn't need to offset its operations through overseas markets.

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

Pick one:

yes

no.

All Bills are subject to change, and if new climate modelling or exceptional circumstances occur, then new targets may need to be set. However, the Bill should set explicit criteria which must occur to trigger any review of the targets, which must be underpinned by robust science.

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.

I think this is reasonable, and could work for the first 15 years to show the path we need to follow. However, I also think each city, town, industry and large business (e.g. Fonterra) should also have a similar 5-year budget that they are allocated, and which they need to meet, that aligns with the overall total Government/NZ goal. I think this approach may need to be revisited after the

first 5-10 years to see how well it is working, and who is keeping to their carbon budgets. It may be that biannual or annual plans may need to be implemented after this initial 5-10 year period.

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.

The reality is that a determined Government will change any budget anyway, so may as well allow them to have this latitude. However, as long as the Bill ensures that all carbon accounting is clearly documented, and all political decisions that could affect carbon need to report the effects of any changes to this Bill. The public will then need to decide for themselves if the Government of the day that makes any changes is doing so for the benefit of current and future New Zealanders, and vote accordingly.

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.

I think the mechanism as to how this should happen needs to be clearly set, e.g. a 75% vote in Parliament that agrees that the current conditions represent 'exceptional circumstances' and so can trigger changes to the Bill. Any change also needs to be stated for a set period, so that they expire.

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.

Optional comment

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.

Optional comment

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?

Achieving net zero carbon emissions while also creating as much benefit as possible to New Zealanders (social, economic, cultural, environmental). Forestry is being seen as a panacea to offset carbon, but as the recent Tolaga Bay floods have demonstrated, production forestry is detrimental to NZ in the long-term, with massive loss of soils etc. Appropriate land-use for different sites needs to be developed, and the most vulnerable sites should have native permanent forestry with no introduced browsing animals established. This will capture carbon not just in trees but in long-term storage of soils – much more effective and sustainable than exotic forestry. High value woods of NZ natives could be established in appropriate locations, with harvests in 150-200 years or more.

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.

No – the commission needs to do more than this. An advisory and monitoring agency is easily ignored by politicians. The Commission should provide advice,

and then the Government needs to respond to that advice within a given timeframe (e.g. 1 month) if it deviates from that advice. The Government of the day needs to fully and clearly explain why any deviation has occurred, as it needs to be held to account by the Commission. However, I do not believe the Commission should have decision-making powers. That is for Parliament to decide.

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 think a Commission should set the number of units available, in a well-signalled process, at least 1-5 years in advance of their availability. Any commission should definitely not set a maximum price for carbon emissions. If the price increases, that has to lead to greater innovation or businesses demonstrating they are no longer sustainable in the new reality of carbon neutrality, and they fall away.

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.

All Commissioners should be apolitical and declare conflicts of interest, and not have any set agendas. Commissioners should be appointed through a very open and clear forum, and not be stacked with political appointees, as was the disgraceful example of commissioners appointed by the Government in the Canterbury Regional Council to pass a set agenda. The process of appointments needs to be very carefully considered so it contains the highest calibre people that are politically neutral and flexible on other issues.

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

No – I think this is a different (though related) set of issues that would be more effective in its own Bill. The Zero Carbon Bill is simple – it is about getting to zero carbon emissions. It is targeted, easy to understand, yet in itself still very complex. Adding additional components to the Bill risks it getting tied up for longer, and being less effective, in that it is trying to achieve too much. Keep it simple, targeted at reducing emissions only. However, I think a Climate Adaptation Bill of some description is still necessary. However, this could be done by other perhaps simpler and more effective mechanisms - e.g. a National Policy Statement on Climate Adaptation, for example making it illegal to build any simple infrastructure (e.g. houses) within 2m of current sea level. Expensive infrastructure (e.g. roads, >5 storey buildings, industrial developments) could be banned from being built within 5-10 m of sea level. I agree that all the plans and reviews regarding adaptation are necessary, but again, suggest it would be more effective in another Bill.

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.

They all look appropriate.

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.

It makes sense to do this. Best practice and innovation could be developed through this group.

Other comments:

1. I think the ETS should only be one plank of reducing greenhouse gases. With odourless, colourless gases, it is too open to fraud and abuse to know exactly who is emitting how much of which gas, and the only people guaranteed to make money are the carbon traders. Therefore, it should be a zero-fee trading system, or trading undertaken through a Government authorities only (I suggest 1-2% of all carbon credits traded are retained by this authority that can then pay for the maintenance of the system).

2. I suggest all large businesses (I suggest over \$50 million turnover p.a.) and industries (e.g. dairy, forestry, meat & wool) need to have their own carbon budgets allocated to them. If they use less carbon, they could get additional tax credits; if they use more, they should be fined (small fines for low breaches, escalating rapidly to very large fines if they are well over their carbon budget).

3. A carbon tax should also be considered for all carbon dioxide equivalent release of greenhouse gases products to capture low-use users that will not use the ETS directly.

4. I am concerned that the monitoring of particularly non-point source carbon dioxide equivalent emissions will not be robust enough to capture all emissions. E.g. if a sheep is modelled at releasing x L methane/day, farmers will be incentivised to under-report their sheep numbers, or over-report any low-methane emitting sheep that they possess. How are these important details going to be amalgamated so that every single NZ individual and business pays their fair share, and is appropriately incentivised to reduce their carbon emissions?