

# Your submission to Zero Carbon Bill

**Reference no:** 12740

**Submitter Type:** Business / Industry

**Clause**

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

**Notes**

We would like to see the Bill target zero emissions by 2040. The zero emissions target needs to be supported by yearly targets for the next 10 years and then 5 yearly targets leading to zero in 2050.

**Clause**

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

**Notes**

Net Zero Emissions - Net zero emissions across all greenhouse gases by 2040. We need a more aggressive target.

**Clause**

3. How should New Zealand meet its targets?

**Position**

Domestic emissions reductions only (including from new forest planting)

**Notes**

New Zealand is responsible for New Zealand's emissions. We need to become experts at reducing emissions - not leave others to do it for us. We support the 'firewall' principle that New Zealand's targets must be achieved by actual reductions in our own domestic emissions and not through the purchase of overseas carbon credits or an over-reliance on forests as carbon sinks.

**Clause**

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

**Position**

No

**Notes**

It should only allow the target to be shortened.

**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**

The budgets need to be matched by observable action by all NZ government agencies (including Crown Owned Entities) and service providers.

**Clause**

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

**Position**

Yes - each incoming Government should have the option to review the third budget in the sequence

**Notes**

We're going to need to adapt to changed circumstances as climate keeps changing our situation. Changes should only be allowed when they improve emissions reductions.

**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

**Position**

Yes

**Notes**

Changes should only be allowed when they improve emissions reductions. We cannot keep putting off the hard tasks for later.

**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**

The commission's role should include: • devising binding climate budgets • identifying the level of reduction for each form of greenhouse gas (long-lived and short-lived) • monitoring adherence to the set 'firewall' • monitoring progress towards our targets • monitoring cumulative emissions • advising on adaptation. The Climate Change Commission should provide advice to the New Zealand government. To ensure transparency and accountability, I support the Government being required to table all reports from the Climate Change Commission to Parliament.

**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**

Having clear measurable goals and milestones is critical to getting carbon emission reductions.

**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**

As authors of a guidebook on carbon farming ("The Carbon Forest, 2010") we observe that a weak ETS has resulted in insignificant carbon emission reductions and a great sense of uncertainty. This uncertainty has prevented businesses from investing in (a) carbon sequestration, and (b) carbon emission reductions. The Zero Carbon Bill (and all government behaviors) need to be coherent with our Paris Climate Agreement commitments in order to provide certainty for business decision makers.

**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****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**

Policy settings should be in accordance with the goal of meeting or exceeding the Paris Agreement.

**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****Clause**

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

**Position**

No

**Notes**

Adaptation should be covered separately as it entails dramatically different goals.

**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

**Clause**

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

**Notes**

We strongly support the passing of a legally binding climate law and the immediate creation of a Zero Carbon Act. We believe in a net-zero carbon future for New Zealand. We need to make dramatic reductions in our emissions to keep climate change limited to 1.5 degrees and protect our native flora and fauna, our societies and our important infrastructures for ourselves and future generations. We must act now to make a positive difference. The key things we support in a Zero Carbon Act are: • an ambitious Act that follows the climate science by covering all gases across all sectors • a target of net-zero greenhouse gas emissions by 2040 • an Act that targets the emissions from transport, industrial activity, agriculture and all other sources • an Act that includes emissions budgets that should be at least as important as fiscal budgets, with plans set by the Government to achieve these budget • well publicised robust interim milestones for government departments and NZ as a whole • an independent Climate Change Commission of experts to monitor emissions and give advice to the Government to keep New Zealand on track for its emissions reduction goals. We support Zero Carbon Act legislation that establishes the goal of limiting warming to 1.5 degrees. We should not settle for 2 degrees warming. Any higher limit than 1.5 degrees would result in devastating impacts for Pacific Island states and significant extinctions. That is not acceptable. To give us the best possibility of achieving no more than 1.5 degrees warming by the end of the century, we must start making rapid cuts in all greenhouse gas emissions now. We support a net-zero target of 2040, with the majority of cuts occurring over the next decade. We support all greenhouse gases being included in the law, consistent with international climate frameworks. The Intergovernmental Panel on Climate Change (IPCC) clearly states that methane reduction is critical to succeeding in tackling climate change. Our climate law must include all greenhouse gases, including those from our biggest emitting sector - the agricultural sector. We support setting a gross emissions reduction target as well as a net emissions reduction target. We cannot rely on planting trees alone to offset our emissions. We must seek to decarbonise our industry and transport systems. As the Parliamentary Commissioner for the Environment stated in their submission to the Productivity Commission, June 2018, page 4: "Each tonne of emissions offset by forestry is a tonne not reduced at source. Relying too heavily on forestry could lead to continued high levels of gross emissions. Pressure to reduce these after 2050 could entail a more costly and disruptive transition than a deeper transition commenced earlier." We support the 'firewall' principle that New Zealand's targets must be achieved by actual reductions in our own domestic emissions and not through the purchase of overseas carbon credits or an over-reliance on forests as carbon sinks. We support setting legally binding climate budgets that are set at a bare-minimum ambition, which must be achieved or bettered by government within the prescribed timeframes. While budgets should be binding, policy recommendations from the Commission should be just that - recommendations. The world needs pathways to transformational change if we are to avoid catastrophic warming. This is the scale of the challenge. The science is clear: the only way we can succeed is with big ambition. New Zealand must be bold and pass strong law for the sake of our precious earth and future generations. We support the establishment of a Climate Change Commission. The commission's role should include: • devising binding climate budgets • identifying the level of reduction for each form of greenhouse gas (long-lived and short-lived) • monitoring adherence to the set 'firewall' • monitoring progress towards our targets • monitoring cumulative emissions • advising on adaptation. The Climate Change Commission should provide advice to the New Zealand government. To ensure transparency and accountability, I support the Government being required to table all reports from the Climate Change Commission to Parliament. We support the Government preparing a National Climate Risk Assessment. The Government must be required to produce an Adaption Programme to address the climate risks identified in the National Climate Risk Assessment. As authors of a guidebook on carbon farming ("The Carbon Forest, 2010") we observe that a weak ETS has resulted in insignificant carbon emission reductions and a great sense of uncertainty. This uncertainty has prevented businesses from investing in (a) carbon sequestration, and (b) carbon emission reductions. The Zero Carbon Bill (and all government behaviors) need to be coherent with our Paris Climate Agreement commitments in order to provide certainty for business decision makers.

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