

To: Ministry for the Environment

Date: 19 July 2018

Zero Carbon Bill Submission



Kia ora,

My name is Jen Coatham and I am concerned about climate change. I wholeheartedly support the Government enacting the most ambitious Zero Carbon Act possible. I also support the Ministry giving considerable weight to the submission provided by Generation Zero,

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Core principles

The Zero Carbon Act should be premised on the following core principles: “fairness, cost-effectiveness, comprehensiveness, and environmental sustainability. It must also reflect a commitment to Te Tiriti o Waitangi”.¹

The core principles proposed by Generation Zero should drive the development of the Zero Carbon Bill, and underpin every conversation about New Zealand's long-term climate change strategy. They should also be drafted into the Zero Carbon Act itself to shape how statutory powers of decision are exercised. The core principles proposed by Generation Zero are:

Fairness means giving effect to equity considerations, such as intergenerational justice and the principles of a ‘just transition’.² In practice, this means ensuring that vulnerable communities are supported, that there is a just transition for workers in industries where job losses will occur, that the government plays a leading role in the creation of low-emission jobs, and that clear signals are given as early as possible to enable communities and businesses to plan for the impact and opportunities of emission reduction policies, as well as the effects of climate change, such as sea level rise.

Cost-effectiveness means adopting long-term strategies which minimise cost and maximise benefits for New Zealanders. In particular, this means setting targets and plans that avoid passing the cost of transition to young and future generations.

Comprehensiveness means taking an economy-wide approach to New Zealand's emission reduction and resilience strategy. The strategy must encompass all sectors, drive coordinated decision-making and analysis across government, and be sufficiently funded

¹ Generation Zero, Submission on the Zero Carbon Bill, July 2018.

² ‘Just transition’ is a phrase often invoked yet seldom understood. It refers specifically to a framework that has been developed by the global trade union movement to encompass a range of social interventions needed to secure workers' jobs and livelihoods when economies are shifting to sustainable production. On 19 June 2013, the International Labour Organization adopted a *Resolution concerning sustainable development, decent work and green jobs*. For a New Zealand perspective on these issues, see generally Council of Trade Unions, *Just Transition: A Working People's Response to Climate Change* (2017).

and resourced.

Environmental sustainability means considering the holistic environmental impact of climate change policies, not only the extent of greenhouse gas reductions.

Honouring Te Tiriti o Waitangi

I strongly support the Zero Carbon Act honouring Te Tiriti o Waitangi; giving effect to meaningful partnership between iwi and the Crown. Whilst recognising that it is difficult to honour Te Tiriti in the kawanatanga space, I strongly believe that our climate change response must be informed by tikanga Māori, Māori worldviews towards climate change, and other Māori interests. The Zero Carbon Act's targets and policies must be made consistently with the tino rangatiratanga of iwi and hapū, as enshrined in Te Tiriti.

Furthermore, there needs to be clear processes through which Māori perspectives are gathered and incorporated into a just transition to a zero carbon economy. These processes should take into account the variation of views in amongst iwi and hapū. The incorporation of local indigenous knowledge, and localised engagement with iwi and hapū, as well as rāwaho, should be fundamental to the consideration of Māori perspectives under the Zero Carbon Act.³ These ongoing processes need to be transparent and well communicated to the wider community in order to provide effective engagement with tangata whenua.⁴

It is also imperative that the Government works in partnership with iwi and hapū to develop the Zero Carbon Bill. Throughout this development process, the Government must undertake meaningful consultation with Māori on climate change issues, fulfil its duty under Te Tiriti to actively protect Māori rights and rangatiratanga over their own interests, and recognise that tangata whenua will be disproportionately affected by the impacts of climate change.

³ Tawhai, V. M. H. "Rāwaho: In and out of the Environmental Engagement Loop" (2010) In *Māori and the Environment: Kaitiaki*, edited by Selby, R., Moore, P. & Mulholland, M. (Huia Publishers), 77–94.

⁴ Roberts et al. "Kaitiakitanga: Maori Perspectives on Conservation" (1995) *Pacific Conservation Biology*: 2(1). Surrey Beatty & Sons: 7–20.

I agree with Generation Zero and strongly support active consideration of the Zero Carbon Act's role in a Tiriti-centric constitutional transformation of Aotearoa New Zealand going forward. It is important to note that many going and significant constitutional issues in New Zealand lie within the scope of sovereignty and property. As such, I believe that consideration should be given to these constitutional issues when drafting the Zero Carbon Bill. When considering these Tiriti-centric constitutional changes I believe it would be reasonable to have regard to:

The concept of Kaitiakitanga

Kaitiakitanga denotes guardianship, conservation, fostering, preservation, protecting, or sheltering; in modern contexts this is especially pertinent to discussions of the environment and sustainability. I believe that this will be an important concept in the transition to a low emissions economy in addition to honouring Te Tiriti and recognising the value of Māori perspectives. Notably, I think it is important to have regard to the idea that:

"Kaitiakitanga is integrated with the spiritual, cultural and social life of tangata whenua; is holistic across land and sea; includes people within the concept of environment; is locally defined and exercised; does not focus on ownership, but on authority and responsibility."⁵

I believe that Rev. Maori Marsden's '*Kaitiakitanga: A Definitive Introduction to the Holistic World View of Māori*' would be a good resource to use when considering the concept of kaitiakitanga.⁶

He Whakaaro Here Whakaumu Mō Aotearoa and the Prospective Constitutional Place of Te Tiriti⁷

I believe that the report of Matike Mai Aotearoa, The Independent Working Group on Constitutional Transformation (IWGCT) would be a very valuable resource in considering

⁵ What is Kaitiakitanga? Environment Guide (2018). Environmentguide.org.nz. Retrieved 16 March 2018, from <http://www.environmentguide.org.nz/issues/marine/kaitiakitanga/what-is-kaitiakitanga/>

⁶ Marsden, M. (November 1992). *Kaitiakitanga: A Definitive Introduction to the Holistic World View of Māori*.

⁷ *He Whakaaro Here Whakaumu Mō Aotearoa*, Matike Mai Aotearoa, The Independent Working Group on Constitutional Transformation (2016)

partnership models of Māori-Crown governance. Specifically paying attention to the six different models for a new constitutional arrangement identified by the IWGCT:

1. A tricameral or three sphere model consisting of an Iwi/Hapū assembly (the rangatiratanga sphere), the Crown in Parliament (the kāwanatanga sphere) and a joint deliberative body (the relational sphere).
2. A different three sphere model consisting of an assembly made up of Iwi, Hapū and other representation including Urban Māori Authorities (the rangatiratanga sphere), the Crown in Parliament (the kāwanatanga sphere), and a joint deliberative body (the relational sphere).
3. A further three sphere model consisting of an Iwi/Hapū assembly (the rangatiratanga sphere), the Crown in Parliament (the kāwanatanga sphere), and regional assemblies made up of Iwi, Hapū and Crown representatives (the relational sphere).
4. A multi-sphere model consisting of an assembly of Iwi/Hapū and other Māori representation (the rangatiratanga sphere) and the Crown in Parliament (the kāwanatanga sphere). It also includes a relational sphere which would have two parts – a constitutionally mandated set of direct Iwi/Hapū/Crown relationships to enable direct Iwi/Hapu-Crown decision-making plus a unitary perhaps annual assembly of broader Māori and Crown representation.
5. A unicameral or one sphere model consisting of Iwi/Hapū and the Crown making decisions together in a constitutionally mandated assembly. This model does not have rangatiratanga or kāwanatanga spheres. It only has the relational sphere.
6. A Bicameral Model made up of an Iwi/Hapū assembly and the Crown in Parliament. This model has distinct rangatiratanga and kāwanatanga spheres but has no provision for a relational sphere.⁸

The Granting of Legal Personality to Te Urewera and the Whanganui River⁹

Irrespective of the meritorious nature of a Māoritanga¹⁰ value-based perspective when considering sustainable practices, many interpreted the granting of legal personality as a

⁸ *He Whakaaro Here Whakaumu Mō Aotearoa*, Matike Mai Aotearoa, The Independent Working Group on Constitutional Transformation (2016) pp. 104-105

⁹ See: Te Urewera Act 2014, Te Awa Tupua (Whanganui River Claims Settlement) Act 2014

¹⁰ (noun) Māori beliefs, culture and practices - (<http://maoridictionary.co.nz/word/3649>)

mechanism through which to protect these places against (human caused) degradation of the area and improve environmental protection.¹¹ Though in practice this position may be sound, I believe this to be an oversight. "The granting of legal personality recognises the way in which Māori, the indigenous people of Aotearoa New Zealand, conceive of and relate to the particular places at issue".¹² There is significant value in the Māori perspectives and in any case, I maintain that the government should improve Māori-Crown partnerships in decision-making and honour Te Tiriti. Specifically providing for consultation with places granted legal personhood (or those granted legal personhood in the future), and ensuring flexibility within the Zero Carbon Act to have regard to different stewardship arrangements, should be considered when thinking about Tiriti-centric constitutional changes.

Importance of a well-designed, long-term framework

Climate change is bigger than politics. We need political parties to work together and look beyond election cycles. To date, New Zealand's climate change response has been incoherent and inadequate. A long-term legal framework will help to ensure that New Zealand's transition to a resilient, zero carbon economy occurs by the fairest and most cost-effective pathway possible.

I agree with the Parliamentary Commissioner for the Environment and the Productivity Commission that the UK's Climate Change Act 2008 provides a useful model for developing a strong legal framework in New Zealand. I also support the UK model being appropriately tailored to suit the New Zealand context. This approach has underpinned the development of Generation Zero's Zero Carbon Act policy blueprint to date.

We submit that a well-designed Zero Carbon Act, based on the UK model, and backed by cross-party support, will promote the following interrelated outcomes:

Accountability: The mandatory duties and legally-binding targets in the Zero Carbon Act, combined with the oversight provided by the Climate Change Commission, will ensure that the Government is held to account politically and legally. Accountability drives action and promotes certainty. It must be a central pillar of New Zealand's climate change response.

¹¹ Mari Margil, "Building an International Movement for Rights of Nature", in Michelle Maloney and Peter Burdon (eds), *Wild Law -- In Practice*, (2014) 149, 156.

¹² Geddis, A., Ruru, J., [Draft] 'Places as Persons: Creating a New Framework for Māori-Crown Relations'. Presented at Public Law Conference, July 2018.

Long-term certainty: The long-term focus of the Zero Carbon Act is valuable for two reasons. The first is to provide communities and businesses with the certainty they need to:

plan ahead;

take up opportunities created by a zero carbon economy;

invest with confidence in low emission options;

take complementary steps to reduce emissions; and

understand what New Zealand's transition to a zero carbon future will mean for them.

Policy coherence: The second benefit of a long-term focus is to drive better policy-making. The cost/benefit analysis of policy options differs depending on the timeframes and objectives being considered. Without the long-term lens of a Zero Carbon Act, we run the risk of ineffective policies and decisions that prioritise cost-avoidance in the short term. Kiwirail's decision to replace its electric trains with diesel trains, for example, is a product of perverse short-term thinking. Decisions like this undermine emission reductions elsewhere. The long-term focus of the Zero Carbon Act will allow us to:

develop a coherent policy pathway that drives emission reductions over both the short and long-term, which will be fairer, more cost-effective, and less disruptive overall;¹³

better identify and reap the co-benefits of transitioning to a zero carbon economy;

send more accurate signals to the market to avoid stranded assets and inefficiencies;

and

ensure New Zealand's climate change response is coordinated across government and all sectors of the economy.

Expertise: Establishing an independent Climate Change Commission with expertise in a range of relevant areas (including climate science, technology, and agriculture) will drive our transition to zero carbon by promoting evidence-based policy pathways, and preventing New Zealand's long-term climate strategy from being waylaid by political short-termism.

¹³ It is by looking ahead and planning backwards that we can most effectively drive action in the near-term. Urgent action is paramount. Indeed, both the Productivity Commission, and the Government's economic models prepared for the *Our Climate Your Say* consultation, highlight (a) the risks, and (b) the additional cost of delaying New Zealand's transition to a zero carbon economy.

Transparency: The Zero Carbon Act will promote transparency through emission budgets and policy plans being set well in advance, and through reporting duties such as emission forecasts and progress reports. Transparency promotes clarity, public engagement, and accountability.

The Zero Carbon Act will need to be carefully designed to give full effect to its core principles, to honour Te Tiriti o Waitangi.

Responses to Discussion Questions

Question One: What process should the Government use to set a new emissions reduction target in legislation?

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.

We should set a target in legislation now. Generation Zero is calling on all Members of Parliament to build political consensus around the direction of New Zealand's climate change response and commit across the House to an ambitious, legally binding, long-term target in the Zero Carbon Act.

Question Two: If the Government sets a 2050 target now, which is the best target for New Zealand?

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.

I support Generation Zero's submission that the target should be net zero total greenhouse gases by 2050, based on a two baskets policy approach. So:

All greenhouse gases, including methane, must be significantly reduced.

New Zealand should take a science-based approach to ensure our emission reduction efforts are as impactful as possible. A science-based approach means:

Minimising cumulative emissions and gross emissions; and

Distinguishing between long and short-lived greenhouse gases.

Q3. How should New Zealand meet its targets?

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 Zero Carbon Act should be met through domestic emissions reductions only. I support Generation Zero's 'firewall' principle. Relying on international carbon credits (even if the credits have integrity) creates uncertainty about what reductions need to be achieved in New Zealand. It also means we are investing in other countries' low emission transitions, rather than our own.

Q4. Should the Zero Carbon Bill allow the 2050 target to be revised if circumstances change? Yes or No

The 2050 target should only be revised in exceptional circumstances. A clear, legally binding target is the cornerstone of the Zero Carbon Act framework. There are two situations where it would be clearly appropriate to change the 2050 target. These are:¹⁴

A significant change in scientific knowledge relating to climate change.

A significant change in international law (for example, the Paris Agreement becoming more ambitious).

Q5. 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? Yes or No

Yes. Legally-binding emission budgets, set 10-15 years in advance so that 3 budgets are in effect at all times, at a level recommended by the Climate Change Commission and approved by Parliament, are a cornerstone of the Zero Carbon Act. I support the budgets

¹⁴ For a model clause, see UK Climate Change Act 2008, sections 2 and 3.

being 5 years in duration, and the first 3 emission budgets being set shortly after the introduction of the Zero Carbon Act.

Furthermore, I support the general intent underlying the Parliamentary Commissioner for the Environment's recommendation for a 3 year mid-point budget review.¹⁵ Each Parliament should be required to turn its mind to long-term climate change policy at least once during its term.

I submit that emission budgets (and other legal duties in the Zero Carbon Act) must be capable of legal enforcement. This will increase certainty for communities and businesses, and promote accountability, which drives action. The Zero Carbon Act should clarify the legal implications of the Government failing to (a) set an appropriate emissions budget; or (b) set policy plans capable of meeting future budgets. We recommend that the Zero Carbon Act is drafted to facilitate judicial review of these matters. This would allow the courts to compel compliance through the usual forms of relief for unlawful government decision-making. The Act should expressly state who has standing to bring a claim, and the parameters these legal duties should be reviewed against.¹⁶

Q6. Should the Government be able to alter the last emissions budget (ie, furthest into the future)?

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. Emission 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. This would risk uncertainty and instability.

¹⁵ PCE, *Consultation on the Zero Carbon Bill: Submission to the Ministry for the Environment* (2018)

¹⁶ For a more detailed consideration of judicial review in relation to the Zero Carbon Act, see Generation Zero, *Making the Zero Carbon Act work: the Climate Commission and the Courts* (2017)

Q7. Should the Government have the ability to review and adjust the second emissions budget within a specific range under exceptional circumstances? Yes or No

Under exceptional circumstances, yes. Any revision to an emissions budget should require the Government to take into account advice from the Climate Change Commission, and obtain Parliamentary approval.

Q8. 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? Yes or No

Generation Zero generally agrees with the proposed list of considerations in the discussion document which must be taken into account when setting emission budgets.

We submit that all decisions made under the Zero Carbon Act should be informed in the first instance by (a) the core principles outlined by Generation Zero including honouring Te Tiriti o Waitangi, and (b) the centrality of the long-term target. This means emission budgets must be set consistently with a fair, cost-effective and environmentally sustainable pathway towards the 2050 target. Furthermore, following matters should also be considered by the Government and the Climate Change Commission when setting budgets:

- Scientific knowledge about climate change.
- Relevant technology.
- Tikanga Māori, and Māori interests.
- New Zealand's social circumstances, in particular the likely impact of the decision on fuel poverty and employment.
- New Zealand's economic circumstances, including the competitiveness of particular sectors of the economy.
- New Zealand's fiscal circumstances.
- Synergies with adaptation policies to address climate risks.
- Energy policy, including energy supply and the carbon intensity of the economy.
- Co-benefits of emissions reduction measures.
- Minimising cumulative emissions of long-lived greenhouse gases.
- International circumstances, including (but not limited to):

- the human and economic cost of disruptive climatic events globally but in particular across the Pacific;
- New Zealand's international legal and diplomatic obligations;
- the likelihood of carbon leakage from domestic policies;
- the carbon embodied in imported products consumed by households, firms and government activity in New Zealand.
- New Zealand's international aviation and shipping emissions.

Q9. Should the Zero Carbon Bill require Governments to set out plans within a certain timeframe to achieve the emissions budgets? Yes or No

Yes. A notable weakness of the UK Climate Change Act is that it does not set clear timeframes for the Government to make policy plans to meet future emission budgets.¹⁷ I support the Zero Carbon Act introducing a strict time frame of 6 months to publish policy plans after setting an emission budget.

Q10. 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?

The Government's policy plans to meet emission budgets should be comprehensive, fair, cost-effective, environmentally sustainable, and reflect a commitment to Te Tiriti o Waitangi.

Q11. 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? Yes or No

Yes. I support the Climate Change Commission having two functions: (a) providing expert advice, and (b) monitoring our progress and holding the Government to account. I agree that the UK Climate Change Committee model is a strong starting point. The Commission should

¹⁷ See Grantham Research Institute, *10 years of the UK Climate Change Act* (April 2018), page 32.

not be a decision-making body, for the following reasons:¹⁸

Democratic accountability: Elected officials should be ultimately responsible for making plans and meeting Zero Carbon Act targets. The Commission is not democratically elected or accountable to the public. Similarly, the Government should not be able to 'pass the buck' on difficult decisions to the Commission. The Commission's role is to provide expert advice and oversight, and it is the Government that should hold ultimate responsibility and be held to account under the Zero Carbon Act.

Compromised watchdog: A Commission with decision-making powers will be a less effective watchdog. It would have a conflict of interest in holding itself to account over its own policy decisions.

Comprehensive policy plans: Transitioning to a zero carbon economy will require comprehensive and coordinated policies across all sectors of the economy. The Government needs to assume overall responsibility for these plans. Delegating some decision-making powers to the Commission (such as ETS settings) risks these policies being made without properly coordinating with policies elsewhere.

An independent Climate Change Commission is essential to our climate change response. We need an independent body to provide accountability and advice on New Zealand's climate change commitments. The UK's arrangement, where an independent advisory commission is fully integrated into Government and Parliamentary processes, provides a useful model.

It is critically important that the Commission's functions are woven into the core decision-making processes of the Zero Carbon Act. The Government must be legally required to consider and respond to the Commission's advice regarding budgets and policy plans. Further, when the Commission prepares annual reports assessing whether New

¹⁸ We echo the Productivity Commission's findings on this point; see *Low Emissions Economy: Draft Report* (2018), pages 186-187.

Zealand is on track to meet future emission budgets, the Government must be required to respond.

**Q12. What role do you think the Climate Change Commission should have in relation to the New Zealand Emissions Trading Scheme (NZ ETS)?
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.**

It is a fundamental constitutional principle that public bodies making significant decisions about people's economic and social lives should be democratically elected and accountable to voters. The ETS has substantial distributional consequences. It affects people's rights and resources. Consequently, it would be inappropriate for the Commission to have decision-making functions in relation to the ETS.

**Q13. 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?
Yes or No**

I broadly agree with the proposed list of essential and desirable expertise for Climate Change Commissioners in the Government's discussion document. Furthermore, expertise in public health should also be included.

It is of particular importance that the Zero Carbon Act should require the Commission to have expertise in te ao Māori and tikanga.

**Q14. Do you think the Zero Carbon Bill should cover adapting to climate change?
Yes or No**

Yes. I support the Climate Change Adaptation Technical Working Group's recommendation that a strong mandate for adaptation, including clear central government responsibilities,

should be set out in primary legislation.¹⁹ There are important synergies between mitigation and adaptation. Addressing both areas through the same governance framework will promote coordination, co-benefits and efficiencies.

Including an adaptation framework in the Zero Carbon Act will also mean that New Zealand's response to the impacts of climate change is developed in accordance with the same principles (fairness, cost-effectiveness, comprehensiveness, environmental sustainability, and a commitment to Te Tiriti o Waitangi) and in pursuance of the same outcomes (long-term certainty, policy coherence, expertise, transparency, and accountability) as our mitigation strategy. This is consistent with the Zero Carbon Act's overarching objective of facilitating New Zealand's transition to a resilient, zero carbon economy.

Te Tiriti o Waitangi must be central pillar of our adaptation response. I agree with the Technical Working Group that early and meaningful engagement with iwi and hapū is essential to the overall effectiveness of the framework.²⁰

I agree with Generation Zero that the following considerations should inform the Climate Change Commission's functions and composition in relation to adaptation.

Core functions: The Commission's core functions to (a) provide expert advice; and (b) monitor progress and hold the Government to account, are equally valuable in an adaptation context. The Commission should not be a decision-making body, for the reasons outlined in Part III: Climate Change Commission.

Flexibility: The relative importance and required resourcing of mitigation and adaptation workstreams may change as time progresses. Similarly, new technologies and scientific knowledge in relation to mitigation or adaptation may emerge. The Commission's institutional arrangements should be sufficiently flexible to cope with shifts in its primary focus.

¹⁹ Climate Change Adaptation Technical Working Group, *Adapting to climate change in New Zealand* (May 2018), Recommendations 1, 2, 3, 4, 5, 18, and 19.

²⁰ Climate Change Adaptation Technical Working Group, *Adapting to climate change in New Zealand* (May 2018), page 49.

Capacity: Mitigation and adaptation require different expertise. The Commission must have sufficient expertise and support to fulfil its adaptation functions. This includes a skilled secretariat. However, caution should be exercised with respect to staff being transitioned to the Commission at the detriment of other central or local government bodies. The Commission's composition in relation to adaptation, including support staff, requires careful consideration.

Coherence: Adaptation should be addressed by the Commission in coordination with adaptation and mitigation policy plans from across all of government, including work by the National Security System and Ministry for Civil Defence and Emergency Management. This will avoid inefficiencies and promote co-benefits. The Commission's oversight can help to ensure that mitigation and adaptation policy workstreams are not siloed from each other.

Regional equity: Ideally, all local and regional councils should have access to adaptation expertise and resources. Smaller councils may struggle in this respect. Again, the Commission's oversight can help to ensure that sufficient resource and central government direction is available for all regions. This will promote a more equitable response to climate change risks across New Zealand.

Furthermore, the Commission should be given the power to create working groups. Using this power, it could create an adaptation working group similar to the UK's Adaptation Subcommittee,²¹ to give adaptation the policy focus it deserves, while simultaneously promoting coordinated mitigation and adaptation oversight through a common governance structure. Risk assessments and policy plans

²¹ The UK Climate Change Act 2008, Schedule 1, section 16, establishes a mandatory Adaptation Subcommittee as part of the UK Committee on Climate Change.

Question Fifteen: The Government has proposed a number of new functions to help us adapt to climate change. Do you agree with the proposed functions? Yes or No

Yes. I support the Government being required to prepare a national climate risk assessment, and a national policy plan to address these risks (in accordance with what Generation Zero has proposed). New Zealand needs to move away from the current ad-hoc and reactionary approach to adaptation. Furthermore, the Commission should be responsible for providing progress reviews in order to ensure independent accountability.

The current uncertainty around adaptation planning resulting from a lack of a coherent plan is detrimental to many in community. In order to foster and facilitate community resilience, it is imperative that Local Authorities have a framework (and are incentivised) to effectively plan and fund long-term adaptation measures for their community. It is also important to determine who should bear the costs of risk prevention and compensation.²²

Q16. Should we explore setting up a targeted adaptation reporting power that could see some organisations share information on their exposure to climate change risks?

Yes or No

Yes. I support the establishment of an adaptation reporting power.

²² Boston, J. & Lawrence, J. "Funding climate change adaptation: The case for a new policy framework" (2018) *Policy Quarterly*, 14(2), 40-49.