

Consultation on Setting New Zealand's Post 2020 Climate Change Target

Submission to the Ministry for the Environment

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About the New Zealand Nurses Organisation

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand. NZNO represents over 46,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment related matters. NZNO is affiliated to the International Council of Nurses and the New Zealand Council of Trade Unions.

NZNO promotes and advocates for professional excellence in nursing by providing leadership, research and education to inspire and progress the profession of nursing. NZNO represents members on employment and industrial matters and negotiates collective employment agreements.

NZNO embraces te Tiriti o Waitangi and contributes to the improvement of the health status and outcomes of all peoples of Aotearoa New Zealand through influencing health, employment and social policy development enabling quality nursing care provision. NZNO's vision is *Freed to care, Proud to nurse.*

EXECUTIVE SUMMARY

1. The New Zealand Nurses Organisation (NZNO) welcomes the opportunity to comment on the Consultation on *Setting New Zealand's Post 2020 Climate Change Target*.
2. NZNO is a member of the International Council of Nurses (ICN) and supports the strongly worded ICN Position Statement *Nurses, Climate Change and Health* which enjoins "nurses and NNAs [national nursing associations] to support actions to reduce global warming and climate change and its impact on health"(ICN, 2008). This includes joining forces with other health profession organisations and nongovernmental organisations in order to exert pressure on governments to ratify Conventions on Climate Change and ensure implementation and application.
3. NZNO is also affiliated to the New Zealand Council of Trade Unions, Te Kauae Kaimahi (NZCTU), whose position on climate change is that Aotearoa New Zealand must have:

- clear targets for emissions reductions;
 - practicable mechanisms for achieving those targets; and
 - that responses to climate change should be based on widespread consultation and analysis in the context of a sustainable development framework that includes social, cultural and economic considerations alongside environmental issues. (New Zealand Council of Trade Unions, 2007).
4. This submission is informed by NZNO's members and staff, particularly nursing members who are actively involved in OraTaiao: The New Zealand Climate and Health Council, with additional comment by nurses involved in national and local planning for a wide range emergency and disaster preparedness including pandemics, natural disasters, community resilience etc., our Pacific Nurse Section, and nursing, industrial, policy, and research advisers.
 5. Many NZNO members and staff participated in the community fora held throughout the country and we extend our thanks to the Ministry for this opportunity.
 6. This submission focuses primarily within the nursing scope of practice, discussing the evidence that climate change will have an overall negative impact on health in Aotearoa New Zealand, and that this impact on health must form a vital part of determining a target for reducing greenhouse gas (GHG) emissions.
 7. Beyond this, we are concerned that the health impacts of climate change will not be shared equitably amongst our population, and that those already disadvantaged in terms of health access and outcomes, such as Māori and Pacific peoples will be particularly vulnerable to the negative health impacts of climate change. Without specific preventative action, climate change is likely to exacerbate inequity attributable to the social determinants of health.

8. The economic impact of climate change is and will be significant, and, unless there is comprehensive planning and investment in socially just transition support for workers, including job protection and retraining, as well as investment in green technologies (“Just transition”), the most vulnerable will be the first to suffer.
9. In this context, we challenge the legitimacy of cost modelling for ‘average’ households as the benefits of productivity gains over the past few decades, largely due to new technologies, have not been equally shared, and indeed have driven inequity.
10. As the leading professional and industrial representative for over half the health workforce, NZNO looks forward to further engagement with the Ministry for the Environment to mitigate the risks and leverage the co-benefits of actions that will reduce the impact of climate change on health.

CONSULTATION QUESTIONS

Question 1

- a) **Do you agree with the objectives set for our [Aotearoa New Zealand’s] contribution to global climate change targets i.e.**

- it is seen as a fair and ambitious contribution – both by international and domestic audiences**
- costs and impacts on society are managed appropriately**
- it must guide New Zealand over the long term in the global transition to a low emissions world.**

11. We are particularly concerned that health considerations did not feature in the discussion document.

12. This is astonishing in view of the seriousness with which the impact of climate change on health is viewed internationally, as evidenced by the World Health Assembly's Resolution WHA61.19 on climate change and health (2008) which urged member states (of which Aotearoa New Zealand is one) to commit to "building capacity and planning actions and investments at the national level to address the effects of climate change on health".
13. Clearly the New Zealand government has an obligation to be able to assess both the health risks expected with climate change and the health benefits of emission reductions to inform policy for post 2020 emissions targets.
14. As nurses we emphasise the importance of evidence-based decision making.
15. The scientific evidence is clear that anthropogenic climate change is occurring as a result of the emissions of climate changing greenhouse gases by humans (IPCC, 2014).
16. The evidence is also clear that climate change is having, and will bring further, negative impacts on the health of human populations. The premier international health agency, the World Health Organisation (WHO) is warning climate change is *the greatest threat to human health* this century¹.
17. Climate change will affect the pattern of diseases and deaths from exposure to high or low temperatures and result in increased climate sensitive risks. As a result it is anticipated that diarrhoea, malnutrition,

¹ <http://www.3news.co.nz/world/who-climate-change-major-threat-to-human-health-2014083116#ixzz3bwjKmxBJ>

malaria, dengue, heat stress, and the number of people killed or injured in coastal floods will be higher.

18. There will be greater frequency of infectious disease epidemics following floods and storms, and substantial health effects following population displacement due to sea level rise and increased storm activity.
19. There are health consequences of ozone depletion including increase in skin cancer and cataracts. Extreme weather patterns will have serious impact including drought, heat wave, floods and other events that will be key determinants of global food crisis leading to hunger, malnutrition, political instability, disease and death.
20. Climate change will impact health in Aotearoa New Zealand through an increase in heat waves and other extreme weather events, changing patterns of infectious diseases, mental health impacts, loss of livelihoods impacting the determinants of health, and flow-on effects from global population migration and conflict. Current predictions suggest that children born today will live into +4°C climate, creating a change in climate so severe that the ability of humans to adapt in some parts of the world is uncertain.
21. We note that the strength of the scientific consensus for anthropogenic climate change is at least as strong as it is for the link between smoking and cancer. The success that strong, well directed and implemented policy targets has had on reducing tobacco-related disease is an excellent example of what could be achieved with a similarly dedicated response to emissions targets in the transition to a low carbon economy.
22. The cost of *inaction* on climate change will also have a substantial and negative impact on population health. We particularly point out the need to account, and comprehensively plan, for “Just transition” to a low carbon economy. This should encompass fair support for workers,

including job protection and retraining, as well as investment in green technologies to prevent and reduce increasing income and opportunity disparities.

23. As the NZCTU has said repeatedly (and we invite you to note the date of the following statement): "There will be a need for skilled workers in terms of a renewed focus on energy audits, emission reductions, alternative energy uses at home and at work, and based on the application of new technologies. It is vital that work commences now to provide the basis for such skill development."(New Zealand Council of Trade Unions, 2007).
24. If well-planned action to reduce greenhouse gas (GHG) emissions were undertaken globally and in Aotearoa New Zealand, there could be substantial positive impacts not only for limiting future climate change, but also for improving health, equity, and wellbeing (Bennett et al., 2014).
25. In terms of objective one, beyond being "seen as a fair and ambitious contribution", we note firstly believe the NZCTU's salient warning that: "A small trading nation like New Zealand is heavily reliant on being able to substantiate our clean, green image and if that dissipates the economic costs could be overwhelming"².
26. Secondly, we would like to emphasise the importance of public health considerations in determining whether our contribution is indeed fair and ambitious.
27. Similarly, and as will be discussed later, the "costs and impacts on society" mentioned in objective two need to include the health costs

² <http://union.org.nz/news/2009/ctu-position-on-emissions-reduction-target>

and impacts of inaction, or inadequate action, with regard to our climate change emission targets.

28. We believe that an ambitious climate action and emissions reduction is the best way to protect the health of the Aotearoa New Zealand population and the prospects for our PIC neighbours.
29. The management of any costs, both of climate change action or inaction, must be done in such a way as to ensure any risks or costs are fairly distributed, and do not unfairly impact those already experiencing health disparities.
30. In terms of objective three, it is important that Aotearoa New Zealand has a timely response to emission reduction, as the potential health risks from climate change increase the longer it takes to reduce global emissions. Long-term vision is important, but timely action is also vital for health.

1 b) What is most important to you?

31. What is most important to NZNO members is that:
 - the health risks of climate change are considered in Aotearoa new Zealand's emission reduction objectives;
 - the health co-benefits of emission reduction actions are also considered; and
 - that all objectives have a focus on health equity.

Question 2: What would be a fair contribution for New Zealand?

32. New Zealand's healthy economy is reliant on a healthy population, and equity is a key determinant of health and prosperity.
33. Climate change increases various risk factors that will negatively impact on health, as discussed previously.

34. Evidence suggests that New Zealand must take dedicated steps towards emission reductions of at least 95% of our total greenhouse gas emissions (below 1990 levels), and zero carbon emissions, by 2050 in order to protect against the worst health impacts of climate change.
35. As will be discussed below, many of these emission reduction opportunities carry with them various health co-benefits, which occur with the reduction of agricultural emissions as well as the reduction of energy and transport emissions.

Question 3: What level of cost is appropriate for New Zealand to reduce its greenhouse gas emissions? For example, what would be a reasonable reduction in annual household consumption?

36. Any discussion of costs of emission reduction must also consider the costs of climate change inaction on health.
37. Along with a cost analysis of inaction, attention must also be paid to the costs associated with adaptation to the impacts of climate change, as well as ensuring that adaptation leads to an equitable distribution of negative impacts, and adheres to the Crown's obligations under teTiriti o Waitangi.
38. A cost analysis must also acknowledge the various health benefits of emission reduction approaches.
39. Promotion of active transport options has the co-benefit of increasing physical activity, decreasing cardiovascular risks and other non-communicable diseases.
40. There is increasing evidence that, for many people, including the 250,000 children living in poverty, healthy food is unaffordable. A healthy diet is diverse and should be affordable for all people living in Aotearoa New Zealand. Consideration should be given to supporting

food production which will both decrease our emissions and improve population health and equity.

41. Improving insulation in houses, and promoting energy efficient household heating systems will decrease energy usage, reducing climate change emissions, and also benefit population health and reduce health costs by reducing illnesses associated with cold, damp housing, such as asthma, rheumatic fever, eczema etc.
42. The phasing out of coal and lignite mining will decrease New Zealand's contribution to global fossil fuel emissions, and reduce the negative health impacts of air pollution.
43. These co-benefits on health of mitigation actions are significant, and must be acknowledged in a cost analysis.
44. Government investment in active transport, healthy housing, healthy eating and healthy action policy is essential for households to implement these changes.
45. The economic impact of climate change is and will be significant, and, unless there is comprehensive planning and investment in “Just transition” support for workers, including job protection and retraining, as well as investment in green technologies, the most vulnerable will be the first to suffer.
46. We also note the absence of any reference to the need for a “Just Transition and Decent Work” for workers when moving towards a low carbon economy. We draw your attention to the International Trade Unions Confederation’s (ITUC) Frontline Briefing paper *Climate Justice: There are no jobs on a dead planet* (International Trade Unions Confederation, 2015).
47. In this context, we challenge the legitimacy of cost modelling for ‘average’ households.

48. The benefits of productivity gains over the past few decades, largely due to new technologies, have not only not been equally shared, they have been dramatically annexed by the most wealthy and have led to the galloping and entirely preventable inequity (see, for instance, The Role of Taxes and Transfers (OECD Economics Department Policy Notes, 2012) that prevails in Aotearoa New Zealand.
49. We reject the inadequate analysis that assumes equal sharing of the costs of targets and transition to a low carbon economy, without acknowledgement or analysis of how unequally that impact is likely to be felt.
50. Robust cost benefit analysis should indicate unfair distributions of costs and/or benefits of policy actions.

Question 4: Of the opportunities for New Zealand to reduce its emissions (as outlined on page 15 of the discussion document), which do you think are the most likely to occur, or be most important for New Zealand?

51. Much of the discussion document focuses on agriculture-related emissions, however half of our emissions are long-lived carbon dioxide from transport and energy usage.
52. Technology and policy options are already available to assist in rapidly reducing these emissions to zero.
53. Aotearoa New Zealand needs to make firm commitments to reduce all climate change emissions in order to prevent the negative health impacts climate change will have, and must do so with a high level of urgency.
54. As discussed above, many of the opportunities for emission reductions carry health co-benefits, and consideration of these co-benefits must be included in any discussion of emission reduction targets.

Question 5: How should New Zealand take into account the future uncertainties of technologies and costs when setting its target?

55. As with all healthcare professionals, nurses, are familiar with the allure of future scientific discoveries as cures for current problems.
56. There is limited certainty of the viability of future technologies to address climate change emissions. On the other hand, the evidence is clear and available to indicate the short-to-medium term benefits of appropriate mitigation policies.
57. Foregoing available interventions in the hopes of more effective future interventions is never an ethical option when treating current acute or chronic illnesses, nor is it an ethical option in relation to the mitigation of climate change.
58. The government should not bank on the uncertain hope of future technological discoveries instead of implementing current, available, evidence-based policy changes right now.
59. It is our position that the government must make a clear, strong, and consistent commitment to make changes now based on existing evidence and technology, while continuing to pursue beneficial future technologies.

CONCLUSION

60. In conclusion, NZNO **supports** an **emissions reduction target of 95% reduction in total GHG emissions (below 1990s levels) and zero carbon emissions by 2050** and **recommends** that the Ministry:
 - makes health an integral part of its decision-making process on climate change actions and targets;
 - works with the Ministry of Health, Ministry of Social Development and the Ministry of Business, Innovation and Employment, and

whichever agency is now responsible for research, to develop the capacity and capability to address the health implications of climate change, as per its international obligations under Resolution WHA61.19;

- establish a Parliamentary climate change and health summit ;
- require Health Impact Assessments (the tools for which have been developed by the Ministry of Health some time ago) to be routinely carried out at national and local government level to inform climate change policy development;
- ensures “Just transition” support for workers, including job protection and retraining, as well as investment in green technologies; and
- involves the health sector and public health expertise when working on mitigation and adaptation strategies.

61. NZNO looks forward to further engagement with the Ministry for the Environment to mitigate the risks and leverage the co-benefits of actions to reduce the impact of climate change on health.

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