

12 July 2018



MINISTRY FOR THE ENVIRONMENT

PO BOX 10362

WELLINGTON, 6143

Tēnā koe,

**Submission to the Zero Carbon Bill from the Whakatāne District Council**

Thank you for the opportunity to submit on the Zero Carbon Bill. The Whakatāne District Council (WDC) wishes to make the submission points outlined on the following pages. We note that the success of efforts to reduce emissions will rely on central government, local government, and communities working together. It is imperative for central government to show strong leadership in this space to enable local government to follow suit with confidence.

We **do not** wish to be heard in support of this submission.

For specific enquiries related to the submission please feel free to contact the Strategic Policy Team at WDC on 07 306 0500 or [StrategicPolicy@whakatane.govt.nz](mailto:StrategicPolicy@whakatane.govt.nz).

Ngā manaakitanga,

Judy Turner

MAYOR (ACTING)

Q	Question	Option supported
1	What process should the Government use to set a new emissions reduction target in legislation?	<i>The Government should set a 2050 target in legislation now</i>
2	If the Government sets a 2050 target now, which is the best target for New Zealand?	<b>Net zero long-lived gases and stabilised short-lived gases:</b> <i>reduce emissions of long-lived gases to net zero by 2050, while also stabilising emissions of short-lived gases.</i>
3	How should New Zealand meet its targets?	<i>Domestic emissions reductions (including from new forest planting) and using some emissions reductions from overseas (international carbon units) that have strong environmental safeguards.</i>  Comment: The Productivity Commission notes in its draft report on a low-emissions economy that land use will need to change substantially in order for New Zealand to meet carbon reduction targets. We suggest that the Climate Change Commission undertake research and provide specific guidance on land use change as part of its role.
4	Should the Zero Carbon Bill allow the 2050 target to be revised if circumstances change?	<i>No.</i>  Comment: In order for Local Government and others to make decisions to reduce emissions with certainty (which will often have impact on budgets), it is crucial that there is a clear, stable target in place which sets New Zealand's direction for the future.
5	The Government proposes that three emissions budgets (a quantity of emissions allowed over a period of time) of five years each be in place at any given time. Do you agree with this proposal?	<i>No.</i>  Comment: We suggest a 6-year timeframe for each emissions budget, to align with the development of every second local government Long Term Plan. This would offer predictability for planning purposes, but also the flexibility to respond to changes that will impact carbon emissions in the longer term.
6	Should the Government be able to alter the last emissions budget (ie, furthest into the future)?	<i>No, emissions budgets should not be able to be changed.</i>  Comment: The Government should have the ability to review and adjust the second emissions budget under exceptional circumstances (as noted below), but otherwise budgets should remain set in order to ensure that they are not at risk of being destabilised by political cycles.
7	Should the Government have the ability to review and adjust the second emissions budget within a	<i>Yes.</i>

	specific range under exceptional circumstances?	Comment: We agree that the second emissions budget in the sequence should be able to be reviewed under exceptional circumstances (e.g. following a natural disaster) and adjusted - within a specified range only.
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?	Yes.  Comment: We agree with the proposal that the Commission be required to consider a number of factors set out in legislation.
9	Should the Zero Carbon Bill require Governments to set out plans within a certain timeframe to achieve the emissions budgets?	Yes.  Comment: The Government must show leadership and commitment to this kaupapa for it to be successful. Clear and transparent plans with specific timeframes for action will help to achieve this. Without a clear plan of action and associated regular monitoring and reporting, targets can become meaningless.
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?	It will be key for central government to work with local government in setting plans to meet the emissions budgets. In particular, focus will need to be placed on the costs that are likely to fall to local government as a result of budgets and plans to achieve them.  Additionally, working with industries that have high carbon emissions will be crucial. The government will need to assist these industries to make significant changes to the way they operate.  Ultimately, a whole of community response is required to achieve carbon reduction targets. A clear communications and engagement plan will be required to ensure the community buys in to the target and understands reason why it is important.
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?	Yes.  Comment: We agree with the proposal for the Commission to have an advisory role in providing advice on the level of emissions budgets, areas of the economy to focus on when achieving emissions budgets, and issues related to climate change as requested. We also agree with the proposal for the Commission to have a role in monitoring New Zealand's progress towards emissions budgets and reducing the risks of climate change.  We also suggest, as noted above, that the Commission specifically provide advice and

		guidance around land use change, as this will be crucial for targets to be met.
12	What role do you think the Climate Change Commission should have in relation to the New Zealand Emissions Trading Scheme (NZ ETS)?	<p><i>Advising the Government on policy settings in the NZ ETS.</i></p> <p>Comment: We note The Productivity Commission’s comment (P186 of the draft report for a low emissions future) that ‘it is not appropriate for a Climate Commission to have decision-making powers. New Zealand’s transition to a low-emissions economy will have profound and widespread impacts, and require the weighing of a range of economic, environmental, social and foreign policy considerations... no government has so far been willing, or deemed it prudent, to transfer decision-rights on climate change mitigation matters to an independent body’.</p> <p>Full government buy-in will be essential to achieving the 2050 target, and therefore we do not support delegated decision-making by a separate body.</p>
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?	Yes.
14	Do you think the Zero Carbon Bill should cover adapting to climate change?	<p>Yes.</p> <p>Comment: We strongly support this option. New Zealand is already experiencing the effects of climate change, and these will continue even if greenhouse gasses are reduced. The local government sector is currently grappling with infrastructure, funding, and community wellbeing concerns related to climate change and its effects. As noted in the discussion document (p47), ‘the way we respond and adapt to climate change is not well coordinated.’ Strong national leadership and action will assist in providing a more coordinated approach.</p> <p>The costs of not adapting to climate change will be far greater than the cost of mitigating carbon emissions.</p>
15	The Government has proposed a number of new functions to help us adapt to climate change. Do you agree with the proposed functions?	<p>Yes.</p> <p>Comment: We agree with the proposal that the Bill should include the following provisions:</p>

		<ul style="list-style-type: none"> <li>- a national climate change risk assessment</li> <li>- a national adaptation plan</li> <li>- regular review of progress towards implementing the national adaptation plan</li> <li>- an adaptation reporting power</li> </ul>
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?	<p>Yes.</p> <p>Comment: We agree that there could be benefits of having an adaptation reporting power requiring organisations to report on risks and risk management. It would be logical that local government would take part in such an arrangement. However, we are concerned that this would impose high financial and resource costs on councils, which are already fiscally restrained and struggling to balance affordability and service delivery. We request that consideration be given to how a reporting power would be funded, as well as a staged approach to implementation to allow organisations time to transition into managing the requirements.</p>