



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)

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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.

Optional comment

Council supports a target to reach net zero emissions by the second half of the century, subject to the advice of the Climate Commission once established. Council recognises this is a rapidly evolving field, and the impact of new technology and scientific endeavour could influence how quickly the target may be reached. We support an approach where long-term predictability and transparency for all sectors is paramount to enable a smooth and fair transition. Council believes an approach that achieves broad-scale political support and consensus is critical to success.

The Climate Change Commission needs to remain 'politically neutral' and promote the goals of a long-term approach that creates certainty and endures political cycles, with cross-party support.

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.

Optional comment

Council supports a balanced focus on reducing carbon dioxide emissions and stabilising short-lived gases. Council recognises the impact of short-lived gases such as methane as a significant issue, but believes that this will take significant time to achieve a workable solution. An approach which enables the benefits of technological and scientific advances to be fully assessed and maximised for reducing the impact of both long and short-lived gases is favoured.

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.

Optional comment

Council supports a balanced approach to be used to enable best use of innovation and technology and minimise economic impacts where possible.

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

Pick one:

- yes
- no.

Optional comment

Council does not support a watering down of the target, but does believe options should be available for a revision of the target should circumstances change. For example, circumstances may include technological innovation, more rapid changes in climate deterioration or revised scientific research.

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.

Optional comment

Council believes a logical approach would be to align this with the parliamentary cycle, and supports the budgets being set at either a three year or six year cycle.

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.

Optional comment

Council supports the option to review the third budget within reason and with care. The system should be set up to enable and promote the goals of a long-term approach that creates certainty and endures political cycles.

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.

Optional comment

We support a pragmatic approach to exceptional circumstances (e.g. in the case of a natural disaster).

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

We generally support the considerations as outlined.

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

Would be helpful to have guidance on the expectations for local government and the role local government will or could play in contributing to meeting emissions budgets.

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?

Comment

Ongoing liaison with local government.

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.

Optional comment

Should also be a portal for information transfer and distribution of knowledge. Important for the Commission to have independence to oversee NZ's climate change commitments.

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.

Optional comment

Primarily an advice role, with the ability to ensure strong influence over government policy, while not making the final decision.

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.

Optional comment

No comments.

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

Optional comment

Council supports the Bill covering adaptation to climate change, and an appropriate framework being established around it that aids Council's response to climate change. A national framework to assist in helping determining investment strategy and priorities would be helpful assuming it is integrated with the other legislative frameworks Council is subject to. Both mitigation and adaptation measures to climate change should be integrated to ensure a full and complete picture of actions is being presented and assessed.

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

Optional comment

Council broadly supports functions, such as a national climate change risk assessment and national adaptation plan. This should be developed in partnership with local government and other sectors.

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.

Optional comment

Council supports this concept, given careful design and co-development with local government and other agencies. It is critical that data is robust and a reporting regime is not onerous in its impact on local government.