



Committee Secretariat
Environment Committee
Parliament Buildings
Wellington

Via email to: zerocarbon@parliament.govt.nz

15 July 2019

Submission on the Climate Change Response (Zero Carbon) Amendment Bill

1. The Hurunui District Council thanks the Select Committee for the opportunity to comment on the Climate Change Response (Zero Carbon) Amendment Bill. This submission has been prepared on behalf of the Hurunui District Council taking into account our role in providing critical community infrastructure and supporting our communities adapt to climate change
2. The Hurunui District is located in North Canterbury. We have approximately 12,850 residents and cover an area of 8,646km² of predominantly rural land. Our District spans from the east coast to the Main Divide. The Hurunui District is primarily a primary producer characterised by small service towns and vast distances to markets. We also have a number of small coastal settlements. The District is now considering how we may help limit the cost of climate change impacts.
3. We generally support the process the Bill puts in place but have two key points:
 - a. Council is not convinced that the target used in the Bill for biogenic methane is achievable or desirable, and
 - b. Adaptation is our key priority and a bottom up approach must be supported by the Bill.

Purpose of the Bill

4. Climate change is a global issue with local repercussions. We note that New Zealand is a comparatively small player in the global community. This does not negate our need to fulfil our global responsibilities and reduce our emissions but it does mean we are reliant on other countries to reduce their emissions as well. The result of the overall global effort will affect the scale to which our communities need to adapt; our communities are already having to adapt.
5. While the Bill focuses on both adaptation and mitigation the purpose of the Bill (and Act) only references mitigation. Specific mention of climate change adaptation should be included in the Purpose section to demonstrate that equal priority needs to be given to both mitigation and adaptation policies.

Climate Change Commission

6. Council generally supports the development of an independent expert Climate Change Commission. Climate change mitigation and adaptation policies need to be developed with a longer term apolitical focus to ensure appropriate business decisions can be made. We generally support the Commission's functions as set out in section 5J and the matters that the Commission must consider as set out in 5L.

7. Council is concerned about the power given to the individual Minister in the Bill. For example, the Minister establishes a nominating committee who then recommends potential members back to the Minister (who then recommends to the Governor General). If the Minister is in charge of the choosing who is on the nominating committee, s/he has the potential to fill the nominating committee with like-minded persons who could nominate a Climate Change Committee that supports their political interests. The Minister is also responsible for recommending how long they are to remain on the Commission. The Bill does not stipulate a minimum or maximum length of service. Council is supportive on ensuring no more than two contracts expire in any one calendar year however we do note the potential power this gives the Minister.
8. The Bill gives a significant amount of power to an unknown future Minister who could be an extreme climate change activist or denier. Council is of the view that the Climate Change Commission must report directly to Parliament to retain its political neutrality and bi-partisan support.

2050 Target and Emissions budgets

9. Hurunui is a significant food producing district. We note that Article 2 of the Paris Agreement aims to strengthen the global response by: “increasing the ability to adapt to the adverse impacts of climate change and foster climate resilience and low greenhouse gas emissions development, in a manner that does not threaten food production.” Council requests that Government acknowledges and honours Article 2 when setting emissions budgets noting the importance of our agricultural industry in food security both nationally and internationally. We also note the significant economic role of agriculture in New Zealand.
10. We support transitioning the economy to a point where all New Zealand greenhouse gas emissions achieve net zero carbon equivalent by 2050. To achieve this we must treat all gases equally relative to their contribution to additional warming. This means it is fully appropriate to take a split gases approach where short-lived gases (e.g., methane) have different emissions reduction targets from long-lived gases (e.g., carbon dioxide and nitrous oxide).
11. Council has concern with the targets as proposed for biogenic methane. We note that these are consistent with those in the IPCC Report however we also note that the economic modelling was done for the global economy and the recommendation was that these should not simply be applied to individual countries. The report also noted that methane reductions would predominantly come from non-agricultural sources. Myles Allen, one of the authors of the report, also said that he would not rely on the model as a basis for national policy.
12. These targets are inconsistent with the work of Dr Andy Reisinger of the New Zealand Agricultural Greenhouse Gas Research Centre (NZAGGRC) who provided a 2050 methane reduction target of 10-22% in order for the gas to achieve a net zero equivalent. Care needs to be taken to ensure an achievable target is set. Council is not an expert in greenhouse gas emissions and cannot comment on what the correct target should be.
13. Our agricultural sector faces some huge challenges to meet the proposed targets. This will rely on the development of new technologies or failing that in reducing stock numbers. The agricultural sector is already facing significant pressure from freshwater and biodiversity policies and we are concerned about the additional pressure climate change policies will have. New Zealand’s agricultural sector is already one of the most efficient in the world.
14. If the target is to remain as is there should be the opportunity for farmers to offset their methane emissions with forestry. This would help to make the target more achievable and equitable.

15. Council is supportive of the process presented in the Bill to set and amend both the 2050 target and the emissions budgets. Council notes the difficulty in setting these targets and budgets given the rapidly changing climate change science and potential for currently unknown technologies to emerge. Council notes the importance of having targets that are sufficiently difficult to change while retaining some flexibility to respond promptly to new information. It is important any changes made and the reasons for these are transparent.
16. Council is not convinced that the targets for biogenic methane are achievable or desirable and would like the Select Committee to have particular regard to Article 2 of the Paris Agreement when making their decision.

Emissions Reduction Plan

17. Council notes that setting the targets is only the first step – how New Zealand is going to meet those targets is the real challenge. Council is supportive of the development of an emissions reduction plan and in particular the sector-specific policies that will be included. In developing these we recommend that sector-specific input is sought including clarifying any limitations faced by individual sectors.

Implementation of the Emissions Targets

18. Section 5ZL states that guidance is to be provided to government departments on how the 2050 Target and Emissions Budgets should be taken into account with performing functions, powers and duties. Council suggests guidance should also be given to local government to provide advice on local government's role in implementing mitigation policies.

Adaptation

19. Council is pleased to see adaptation provisions included in the Bill and hopes to see the status of adaptation raised. Local government needs greater support to work with local communities to adapt to climate change. Adaptation needs to continue to be driven locally with national support.

National Climate Change Risk Assessment

20. Council supports the preparation of a National Climate Change Risk Assessment but notes that as drafted the Minister and Commission are under no obligation to consult with local government in its preparation. It is difficult to see how a meaningful risk assessment will be prepared without local knowledge. Moreover this will be an important public document with potential implications for individuals. Care needs to be taken with its public release to ensure there are no nasty surprises for individuals. Working with local governments in preparing this assessment will help mitigate this risk.
21. We request that risk assessments are done in collaboration with local authorities as risks will vary widely across the country and are partly dependent on the make-up of residents of the area.
22. As the National Climate Change Risk Assessment will be an important document Council recommends that the first assessment is produced by an Interim Climate Change Commission instead of the Minister. The first risk assessment sets the blueprint for future risk assessments and the process must give significant thought to how the legal, economic, social and political consequences will be managed. While Council notes that the risk assessment should be prepared without delay we also emphasise the importance of this document and recognise that this should not be something that is rushed through.

National Adaptation Plan

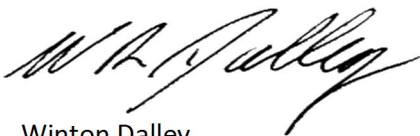
23. Council is supportive of the preparation of a National Adaptation Plan but maintains that this should empower local communities to drive adaptation initiatives. The plan should contain high

level strategic advice on adaptation and provide the tools and funding model to support this. Local adaptation decisions should be made by the local communities, not at a national level.

General comments

24. The Council remains concerned about the potential pressure strong mitigation policies will put on our agricultural sector. The sector is already under increasing pressure to meet freshwater and biodiversity outcomes. We note the importance of our food-producing industries and both for food security and our local and national economy. We hope reduction strategies consider the cumulative pressures on this sector.
25. We are generally pleased that provision has been made for public engagement in the Bill. We want to emphasise the importance of engagement in the development of both the emissions reduction plan and the national adaptation plan. Without the buy-in of local communities these documents will not achieve what they set out to.
26. Finally, we want to stress the importance of adaptation for our local communities. Nobody knows the intricacies of our communities better than they do. While the problems they face may be the similar to the problems elsewhere the people are individuals with individual interests, solutions and ideas. This is their future and they need to be empowered to help shape it. Adaptation needs to be driven locally with national support.
27. Council would like the opportunity to speak to our submission.

Yours sincerely,



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Mayor (on behalf of the Hurunui District Council)

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