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Ministry for the Environment
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ZERO CARBON BILL

Kāpiti Coast District Council supports the Zero Carbon Bill, and appreciates this opportunity to provide feedback.

In addition, Council supports the submissions made by Local Government New Zealand (LGNZ) and Greater Wellington Regional Council (GWRC).

General comments

The Zero Carbon Bill and the proposed Climate Change Commission are a welcome step-change in Government's commitment to acting on climate change.

While the discussion document touches on (i) emissions reductions targets, (ii) the establishment of a Climate Change Commission, and (iii) adaptation, the focus on emissions reductions appears to be stronger than the focus on adaptation. This is troubling because New Zealand's response to climate change must include both mitigation and adaptation.

Climate change adaptation is of particular importance to many local communities, especially as severe storm events appear to be more frequent and coastal hazards pose increasing challenges. Kāpiti Coast District Council agrees with LGNZ who argue in their submission that the 'inclusion of adaptation in the Bill's framework alone will not be sufficient to make real progress in the area. Real progress on effective adaptation will only be achieved if central and local government work together'. However, Council notes that the Zero Carbon Bill offers an opportunity to develop a strong legislative framework to support and enable such cross-government collaborations.

Council supports the establishment of the Climate Change Commission, but argues that this Commission should work alongside Government, not in place of it. While the Commission will provide expert advice and carry out specific programmes of work, there will still be a strong need for other central government agencies to participate in the development and implementation of plans to meet specific emissions reductions targets and take action on climate change adaptation.

Questions from the submission form

1. What process should the Government use to set a new emissions reduction target in legislation?

- the Government sets a 2050 target in legislation now

Kāpiti Coast District Council supports the position of LGNZ, who argue that a target should be set in legislation (i) in order to ensure clarity, certainty, and consistency across sectors, businesses, and communities, and (ii) to provide a strong impetus and platform for action.

2. If the Government sets a 2050 target now, which is the best target for New Zealand?

- net zero emissions: Net zero emissions across all greenhouse gases by 2050.

Kāpiti Coast District Council is in agreement with LGNZ, who write that the 'ultimate ambition' is a transition to net zero emissions across all greenhouse gases by 2050; however, Council acknowledges that some sectors, regions and households will experience more disruption than others in the transition. Therefore, the establishment of any emissions reductions target must:

- incorporate a thorough impacts analysis across all sectors and regions;
- consider the long term changes required to reach the target,
- consider what support central government could provide to assist in carrying out the required changes; and
- be accompanied by plans to support groups that are likely to experience the most disruption.

As an example, Council notes that major land use change will be needed to reduce or offset methane, carbon dioxide, and nitrous oxide in order to obtain net zero emissions (all gases) by 2050 (consultation document, p24). Presumably, any formal plan changes would be made via local and regional governments due to our statutory obligations under the Resource Management Act, and would have the greatest impact on rural, agricultural communities. As such, any proposed land use changes would need to occur in partnership with iwi and in consultation with the local community, and incorporate plans to mitigate disparate impacts. Incentive packages might also be required to ensure that residents – particularly affected local land owners and developers – would participate and buy-in to the change process.

If it is determined that some communities would be extremely disadvantaged by plans to reach net zero emissions across all greenhouse gases by 2050, then a staged approach might be preferred.

3. How should New Zealand meet its targets?

- domestic emissions reductions (including from new forest planting) and using some emissions reductions from overseas (international carbon units) that have strong environmental safeguards.

Kāpiti Coast District Council is in agreement with LGNZ – priority should be given to domestic emissions reductions, but maintaining the option to purchase some emissions reductions from overseas (with appropriate environmental safeguards) affords greater flexibility.

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

➤ yes

It is important that the target can be revised if circumstances change, but restrictions must be set to ensure that changes can only occur when there is strong evidence supporting the change, stringent criteria are met, the process has been transparent, and consultation has occurred. The Bill must ensure any allowances to review the target must not render the target so weak as to be ineffectual, and the target cannot be changed 'at the whim of politics'.

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?

➤ yes

Kāpiti Coast District Council agrees with the concept of emissions budgets (as explained in the consultation document, p36), but does not have a particular opinion on the defined time period for those budgets.

6. Should the Government be able to alter the last emissions budget (ie, furthest into the future)?
7. Should the Government have the ability to review and adjust the second emissions budget within a specific range under exceptional circumstances?

➤ yes, each incoming Government should have the option to:

- (i) review the third budget in the sequence, and
- (ii) review and adjust the second emissions budget within a specific range under exceptional circumstances.

As argued in relation to revisions for the 2050 target (see Q4 above), it is important that budgets can be revised if circumstances change, but restrictions must be set to ensure that changes can only occur when there is strong evidence supporting the change, stringent criteria are met, the process has been transparent, and consultation has occurred. It is important to balance the certainty of established budgets (which is important for developing and implementing transition plans), with the flexibility to change those budgets when required.

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

Kāpiti Coast District Council agrees with what is proposed for the Government and the Climate Change Commission to take into account when advising on and setting budgets (consultation document, p44); however, Council adds that

Government and the Climate Change Commission should also take into account the ability of central government to provide guidance, support and assistance to local authorities, iwi, communities and businesses in the development and implementation of any plans to meet the budgets.

9. Should the Zero Carbon Bill require Governments to set out plans within a certain timeframe to achieve the 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?

➤ yes

From the local government perspective, the most important requirement is to ensure that any plan developed is accompanied by a framework that enables our local communities to benefit as much as possible from the transition. To do this, the plan must consider the social, economic, environmental, and cultural well-being of communities and consideration must be given as to how central government can help with the implementation of the plans in conjunction with local government, iwi, communities and businesses to achieve mitigation and adaptation goals.

For example, in the area of economic well-being, central government could offer guidance and support to ensure that any possible economic decline in some sectors (driven by the zero-carbon transition) is matched by new, zero-carbon opportunities in other sectors – including any upskilling required to prepare local businesses and employees to make the transitions. This is particularly important for the Kāpiti Coast District, where a majority of our employing businesses are in carbon-dependent industries (e.g. construction and roading).

Similarly, any efforts to promote emissions reductions in the transport and energy sectors should continue to be accompanied by government programmes to assist in the process (e.g. subsidies for EV charging station networks; development of more ‘user friendly’ public transport systems; and/or nationwide education campaigns focussed on behaviour change). At the same time, efforts that local governments might make to reduce their own emissions (e.g. zero emission fleets, asset management plans, purchasing programmes, etc) would benefit immensely from clear guidance, recommendations, and even incentive programmes from central government.

Council concurs with LGNZ who argue ‘it is critical that the Climate Change Commission is not a substitute for the Government ... A Climate Change Commission is only part of the solution – there is still a need for the Government to be a leader.’ Government needs to take the lead with the Climate Change Commission providing guidance, advice, and implementation programmes, whilst being supported by the whole of central Government.

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

Kāpiti Coast District Council agrees that there is a need for a Climate Change Commission, but feels that climate change adaptation must play a greater role than what is currently mentioned in the consultation documents.

Council advocates for a Climate Change Commission that will:

- provide ongoing, independent, expert advice on mitigation and adaptation;
- monitor New Zealand's progress towards emissions budgets and reducing the risks of climate change; and
- work alongside the rest of central government to provide support to local governments, businesses, and others to develop and implement adaptation strategies.

12. 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, with mechanisms built in to hold Government to account

Council agrees with LGNZ who argue that decisions about the ETS must remain with Government, as they are democratically elected. A purely advisory role might not be strong enough, however, so Council supports the 'advisory, with mechanisms built in to hold Government to account' option.

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

Council is pleased to note that the proposed range of essential expertise includes several areas that are of particular importance to local government.

These essential areas of expertise are important for two reasons – those areas of expertise would engender confidence in the Commissioners, while also creating a much-needed 'centralised hub' of expertise on climate change mitigation and adaptation. This would be a valuable resource, particularly for local and regional governments across New Zealand, who are currently spending large amounts of money to purchase this expertise from private contractors, often duplicating efforts in the process.

14. Do you think the Zero Carbon Bill should cover adapting to climate change?

- Yes

The local government sector requires additional guidance, support and collaboration for the development and implementation of local and regional climate change adaptation strategies.

Presently, throughout New Zealand, local and regional governments are working alongside iwi, community and businesses to develop climate change adaptation strategies, with central government noticeably absent in many of these conversations. The inclusion of adaptation in the remit of the Climate Change Commission would help to fill this gap, although it is important to ensure that the Climate Change Commission would not be seen as a substitute for the rest of central government which must continue to participate as well.

15. The Government has proposed a number of new functions to help us adapt to climate change. Do you agree with the proposed functions?

➤ yes

Kāpiti Coast District Council supports the proposals to undertake a national risk assessment and to develop a national adaptation plan.

It is important, however, that local governments are involved in this work. Local governments will want to work alongside iwi, community and business to understand what national risk assessments and adaptations plans might mean at the local level. Moreover, as LGNZ argues in their submission, discussions are required between central, regional and local governments about the allocation of roles and responsibilities for funding the costs of adaptation.

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?

➤ yes

Kāpiti Coast District Council supports the concept of a 'targeted adaptation reporting power' provided that the information collected would add value. The reporting tool should not result in unnecessary duplication or become a collection of data that is onerously reported but not well-utilised. As such, careful consideration would be required to ensure that any information collected adds value.

Thank you once again for the opportunity to submit on the Zero Carbon Bill.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Gurunathan', with a large, stylized circular flourish underneath.

K Gurunathan JP, MA
MAYOR, KĀPITI COAST DISTRICT