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Environment Committee
Parliament Buildings
Wellington

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CLIMATE CHANGE RESPONSE (ZERO CARBON) AMENDMENT BILL

Kāpiti Coast District Council supports Government's commitment to acting on climate change, and appreciates the opportunity to provide feedback on the Climate Change Response (Zero Carbon) Amendment Bill (the Bill).

On 23 May 2019, Kāpiti Coast District Council passed a resolution to pursue the goal of carbon neutrality by 2025. At the same meeting, the Council also declared a climate change emergency on the Kāpiti Coast, calling for more support from Greater Wellington Regional Council and the Government on responding to climate change and coastal threats.

While the Council provides comments on each part of the Bill, it is important to note that a common thread throughout this entire submission is that the Bill could go further in ensuring that Local Government is acknowledged and supported as a crucial and necessary partner in achieving an effective climate change response.

Part 1A: Climate Change Commission

The Council supports 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 Central Government to provide support to Local Governments, businesses, and others to develop and implement adaptation strategies.

The Council notes that section 5H(b) in the Bill indicates that the Commission must have members who have 'experience working in or with local and central government', but recommends stronger checks be put in place to ensure that at least one member has a considerable amount of Local Government experience. It is important that the Commission has a solid understanding of the implications that any risk assessments and plans may have on Local Government, alongside a solid understanding of any assistance and support that may be required by Local Government to develop and implement effective climate change responses at the local level.

Moreover, the Council presumes that Local Governments will have an opportunity to provide information to assist the Commission in carrying out assessments and plans, but section 5M on consultation does not indicate that there will be any special opportunities for Local Government to input outside of standard submission

processes. The Council recommends the introduction of a specific clause ensuring that Local Government will be adequately consulted in the development of any assessments, reports or plans developed by the Commission.

Ultimately, Local Government seeks a positive working relationship with the Commission. The Commission will become a much-needed independent and centralised hub of expertise on climate change mitigation and adaptation, and should have some strong powers to ensure that climate change response remains a priority. This will be a valuable resource, particularly for Local Governments across New Zealand, who are currently spending large amounts of money to purchase expertise and advice and often duplicating efforts in the process.

The Council recommends:

- stronger requirements are put in place to ensure that at least one member has a considerable amount of Local Government experience; and
- the introduction of a specific clause ensuring that Local Government will be adequately consulted with for any reports or plans developed by the Commission.

Part 1B: Emission reduction

The Council is pleased to note that the Bill aligns well with our previous submission to the Ministry for the Environment on the Zero Carbon Bill.¹ In that submission, the Council agreed:

- a target should be set in legislation (i) in order to ensure clarity, certainty, and consistency across sectors, businesses, and communities, and (ii) provide a strong impetus and platform for action;
- priority should be given to domestic emissions reductions, but with the option to purchase some emissions reductions from overseas (with appropriate environmental safeguards) to afford greater flexibility;
- the 'ultimate ambition' is a transition to net zero emissions across all greenhouse gases by 2050, but with the acknowledgement that some sectors, regions and households will experience more disruption than others in the transition; and
- targets 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 Council continues to argue that the establishment of any emissions reduction targets must:

- incorporate a thorough impact analysis across all sectors and regions, including consideration of the changes required to reach the targets;
- 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.

While section 5L of the Bill establishes criteria that the Commission must consider when providing advice to the Minister, these criteria do not include considerations on

¹ Kāpiti Coast District Council. 19 July 2018. Submission to the Ministry for the Environment on the Zero Carbon Bill.

how Central Government could provide guidance, support and assistance to Local Government, iwi, communities and businesses to carry out required changes.

As an example, the Council notes that major land use change will be needed to reduce or offset methane, carbon dioxide, and nitrous oxide emissions. Presumably, any formal plan changes would be made via Local Governments due to our statutory obligations under the Resource Management Act, and would have the greatest impact on rural, agricultural communities. As such, at a local level, 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 unequal 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.

In addition, in the area of economic well-being, guidance and support will be required 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).

As these two examples demonstrate, Local Government is a crucial and necessary partner for achieving an effective climate change response, in this case in regards to emissions reductions. The Council presumes that Local Governments will have an opportunity to provide information to assist the Commission and the Minister in setting emissions budgets and developing plans to meet those budgets, but section 5Z on consultation does not indicate that there will be any special opportunities for Local Government to input outside of standard submission processes.

The Council recommends:

- criteria to consider how Central Government could provide guidance, support and assistance to local authorities, iwi, communities and businesses to carry out changes required to reduce emissions; and
- the introduction of a specific clause ensuring that Local Government will be adequately consulted with for the development of emissions targets and plans.

Part 1C: Adaptation

The Council is pleased to see greater weight added to the adaptation part of the Bill, particularly because in the 2018 consultation on the Zero Carbon Bill the focus on emissions reductions appeared to be stronger than the focus on 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.

The Local Government sector requires additional guidance, support (including funding) and collaboration for the development and implementation of local climate change adaptation strategies. Presently, throughout New Zealand, Local 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 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. Once again, the Council does not think the Bill provides any provisions guaranteeing the involvement of Local Government because section 5ZQ on consultation does not indicate that there will be any special opportunities for Local Government to input outside of standard submission processes.

Similarly, while section 5ZV indicates that the Minister may request information on climate change adaptation, there does not appear to be any consideration of the impact of such a request on Local Government. The Council supports the concept of an adaptation reporting power, but it is important that the information collected adds value. Reporting requests should not result in unnecessary duplication or become a collection of data that is onerously reported but not well-utilised. As such, careful consideration is required to ensure that any information collected adds value and is carried out in an effective way.

The Council recommends:

- Central Government works more closely alongside Local Governments, iwi, community, and businesses to develop, implement, and support (including funding) climate change adaptation strategies;
- the introduction of a specific clause ensuring that Local Government will be adequately consulted with for the development of adaptation risk assessments and plans; and
- careful consideration be given to any requests made by the Minister for information regarding climate change adaptation, to ensure that requests do not result in unnecessary duplication or become a collection of data that is onerously reported but not well-utilised.

This Bill provides an opportunity to develop a strong legislative framework to support and enable Local and Central Government collaboration, and the Council contends that there is more that could be done to strengthen this framework.

Thank you once again for the opportunity to submit on the Climate Change Response (Zero Carbon) Amendment Bill.

Yours sincerely

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MAYOR