

Your submission to Zero Carbon Bill

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Clause

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

Position

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

Notes

NZ Pork agrees with the Parliamentary Commissioner for the Environment's suggestion that the target could be set in a two-stage process. Our preference is that the government sets a general statement of ambition in line with the Paris Agreement and then the Climate Change Commission advises, within a defined timeframe, on specific targets based on their expert knowledge and the Government's statement of ambition. We understand that this option means the process of setting the specific target would be longer than under the other option.

Clause

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

Position

Net Zero Long-Lived Gases and Stabilised Short-Lived Gases - Long-lived gases to net zero by 2050 while also stabilising short-lived gases

Notes

New Zealand is in a unique position of having nearly half of its greenhouse gas emissions coming from agricultural activities. This means we need to pay particular attention to the scientific impact of short-lived gases like methane which dominate agriculture's emissions. While NZ Pork has a low Greenhouse Gas profile compared to other livestock industries we would support stabilising short-lived gases such as methane and nitrous oxide. The pork industry does not currently export but it is assumed that the drive for 'carbon zero' products in the export markets will increase and these can be dealt with using voluntary and industry certification standards.

Clause

3. How should New Zealand meet its targets?

Position

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

Notes

It is not clear to NZ Pork how New Zealand can meet our emissions reductions using only domestic reductions. We believe it is important to retain some flexibility especially since the reduction strategy appears to be heavily reliant on new forest planting which may or may not be successful. NZ Pork supports the use of international carbon units providing they are genuine and have environmental integrity and that it is carried out in a way that maintains a steadily rising domestic carbon price to keep incentives for domestic reduction options like forestry.

Clause

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

Position

Yes

Notes

NZ Pork would like to see that there is the flexibility of having the 2050 target revised under specific circumstances and unforeseen events in conjunction with advice from the Climate Change Commission.

Clause

5. The Government proposes that three emissions budgets of five years each (i.e. covering the next 15 years) be in place at any given time. Do you agree with this proposal?

Position

Yes

Notes

NZ Pork agrees that the length of each budget should be five years to provide greater predictability for businesses and communities while remaining flexible for the future. It would also make sense to keep administrative costs down and align emissions budgets with the ETS and international commitments.

Clause

6. Should the Government be able to alter the last emissions budget (i.e. furthest into the future)?

Position

Yes - each incoming Government should have the option to review the third budget in the sequence

Notes

NZ Pork agrees with this approach as it enables each Government to have a say in setting future emissions targets. However, we believe there needs to be some flexibility in particular circumstances, for example, where the science shows that when the budgets are not achieving their desired result they can be amended. The recommendation to amend a budget should come from an independent expert panel such as the Climate Change Commission and not be a decision that the Government can make alone.

Clause

7. Should the Government have the ability to review and adjust the second emissions budget within a specific range under exceptional circumstances? See p36 Our Climate Your Say

Position

Yes

Notes

Although NZ Pork agrees the Government should be able to review and adjust the second emissions budget under certain circumstances (e.g. a natural disaster) any recommendation to amend a budget should come from an independent expert panel such as the Climate Change Commission and should not be a decision that the Government can make alone.

Clause

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? See p44 Our Climate Your Say

Position

Yes

Notes

NZ Pork agrees with the considerations proposed for taking into account science and technology as well as economic, fiscal and social circumstances to help make informed judgements on budgets. We would also like to see some flexibility as meeting the ambitious targets may require policy change in other areas. For example, the immigration policy may need to change to factor in the potential need to bring in workers for new jobs such as tree planting.

Clause

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

Position

Yes

Notes

NZ Pork agrees the Government should be required to publish a plan to meet future emissions budgets as there is no point having a budget without a plan to implement and achieve that budget. The development of a long longer term strategy for a low emissions economy is consistent with the Paris Agreement which promotes international cooperation and indicates NZ is following a rules-based system globally.

Clause

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?

Notes

The Government should consider a robust consultation process for the plans with input from those sectors most likely to be impacted (negatively and positively) by the plans.

Clause

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? See p42 Our Climate Your Say

Position

Yes

Notes

An independent Climate Change Commission of experts should monitor emissions and give advice to keep New Zealand on-track for its emissions reduction goals. NZ Pork supports the option based on the UK Committee model of the Commission having an advisory role plus mechanisms built in to hold the government to account. Has there been consideration given to commissioning research? The Climate Change Commission should be able to commission independent research when there is a knowledge gap, particularly for the unique New Zealand situation regarding agricultural emissions and options for reduction.

Clause

12. What role do you think the Climate Change Commission should have in relation to the New Zealand Emissions Trading Scheme (NZ ETS)?

Position

Advising the Government on policy settings in the NZ ETS

Notes

NZ Pork agrees with the Productivity Commission's and the Parliamentary Commissioner for the Environment's recommendation that the Climate Change Commission act in an advisory role rather than a decision-making role on the NZ ETS. This could help provide greater policy stability and predictability.

Clause

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? See p45 Our Climate Your Say

Position

Yes

Notes

NZ Pork agrees with the proposed expertise which includes climate change policy, risk management, and community engagement etc. We would also like to see an emphasis on agricultural and farming system expertise given that agriculture accounts for a large percentage of New Zealand's Greenhouse Gas Inventory with on-farm emissions making up nearly half of New Zealand's total emissions.

Clause

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

Position

No

Notes

It is not clear from the submission documents provided how this national approach would be of benefit. However, NZ Pork acknowledges that it is important that there is a national understanding and oversight of the risks. The other option is to have local government and other agencies more heavily supported for their roles/responsibilities regarding climate adaptation since the climate change impacts in each region vary considerably. If this needs to be in national legislation then possibly look at another piece of legislation and not dilute the Zero Carbon Bill from its core purpose.

Clause

15. The Government has proposed a number of new functions to help us adapt to climate change. Do you agree with the proposed functions? See p47 Our Climate Your Say

Position

Yes

Notes

NZ Pork agrees with the proposed functions to help us adapt to climate change which include a National climate change risk assessment and adaptation plan which is reviewed regularly, and an adaptation reporting power. We believe it is important to identify risks for New Zealand and plan funding as well as have a planned response based on strong scientific evidence providing robust information for ongoing climate change-related impacts.

Clause

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?

Position

Yes

Notes

NZ Pork agree that a targeted adaptation reporting power should be explored. The sharing of information could assist a co-ordinated approach to risk management, encouraging collaborative and co-operative partnerships between government agencies, sectors and society. Shared responsibilities are important while acknowledging the importance of national leadership. While administrative and compliance costs should be factored in NZ should consider following the United Kingdom example where mandatory reporting resulted in a higher standard of reports and a better understanding of the adaptation action being taken.

Clause

Do you have any other comments you'd like to make?

Notes

NZ Pork would be interested to know more about the proposed action plans and what level of detail they will have. We would like the following questions considered: Is it best to look at what the UK have done as an example? Will individual sector plans that have been adopted by a particular sector be considered by the government when creating the plans to underpin the budgets? What safeguards will the government put in place to ensure that products from countries not meeting NZ's carbon standards or their own countries international obligations are not dumped in New Zealand? This could impact companies with less emissions intensive production losing market share to those with more emissions intensive production.