

18 July 2018

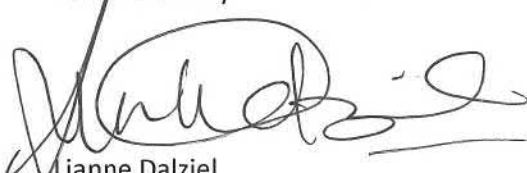
Ministry for the Environment
PO Box 10362
Wellington 6143

Email: ZCB.Submissions@mfe.govt.nz

Christchurch City Council submission on the Zero Carbon Bill discussion document

1. Christchurch City Council (the Council) thanks the Ministry for the Environment for the opportunity to provide comment on the Zero Carbon Bill discussion document.
2. Christchurch City Council has and is undertaking a number of climate change initiatives and commitments. Council would welcome working closely alongside Government in the development of the mitigation and adaptation plans because of the impact these plans will have on the local community and because collaboration between Council and Government should provide a better outcome for the Christchurch community.
3. For any clarification on points within this submission please contact Kevin Crutchley, Resource Efficiency Manager at kevin.crutchley@ccc.govt.nz

Yours faithfully



Lianne Dalziel

MAYOR

Christchurch City Council



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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All or part of any written submission (including names of submitters) may be published on the Ministry for the Environment's website, www.mfe.govt.nz. Unless you clearly specify otherwise in your submission, the Ministry will consider that you have consented to website posting of both your submission and your name.

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Personal / organisation details

You must provide either a company name or given name(s)

Company name: Christchurch City Council

Given names: Brendan

Surname: Anstiss

Contact person: Kevin Crutchley

Address: PO Box 73012, Christchurch 8154

Region: Christchurch

Country: New Zealand

Phone: 03 941 8209

Email: kevin.crutchley@ccc.govt.nz

Submitter type, pick one:

- **Local Government**

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

The Government should set the 2050 target now in legislation to prevent unnecessary delays and uncertainty.

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

We need to include all emissions, because New Zealand's ability to deal with all greenhouse gases in a timely manner is still unknown. An example would be if average global temperatures rapidly increase faster than expected then there will be a call to mitigate emissions faster than is currently being asked for. It would therefore be better for New Zealand to be at the forefront rather than struggling to catch up, which is likely to result in greater economic stress.

Setting the target now creates more certainty and makes it clearer in the direction of travel New Zealand is aiming for.

The way long lived and short lived gases are dealt with could be further investigated in the emissions budget setting requirement process through advice from the Climate Change Commission.

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

There needs to be a strong intent to maximise domestic emissions reductions first.

Council's preference is for domestic emissions reductions only (including from new forest planting) but understands that we need to have flexibility and multiple options to reducing and off-setting greenhouse gas emissions as this will make it easier for New Zealand's economy to adjust.

A timeframe for when international carbon credits could be used should be considered.

Clear guidelines and requirements need to be set for when and what type of international carbon credits can be used.

It is important to clearly define what "strong environmental safeguards" means.

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

Pick one:

- **Yes ✓**
- no.

Optional comment

We need to have the flexibility to adjust the target to suit future greenhouse gas emission reduction requirements but any adjustment to the 2050 target should be through a process that is rigorous, transparent, involves consultation and includes advice from the Climate Change Commission.

The focus and intent of any revision of the 2050 target should be setting a more aggressive target rather than loosening the target. Technology in the future may allow for a more aggressive approach to emissions reduction.

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

Having emissions budgets set each five years will give flexibility to set budgets to suit future greenhouse gas emission reduction requirements but setting the budgets should be through a process that is rigorous, transparent, involves consultation and includes advice from the Climate Change Commission. The five year length of setting the budget would align with New Zealand's Nationally Determined Contributions under the Paris Agreement.

It is better not to align setting emissions budgets with the political cycle so there would be better certainty and consistency to the process of setting emissions budgets.

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

We have no way of knowing today that what is put into the third budget needs to be adjusted before it becomes operable. It is highly likely that over time there is demand for tighter regulation and targets, especially given the number of unknowns with climate change issues.

Changes may be required resulting from the international policy environment at the time requiring tighter restrictions on emissions and technology changes that allow more aggressive emissions reduction.

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

The exceptional circumstances that are required to trigger a review and adjustment of the second emissions budget within a specific range should be clearly defined.

The overall focus and intent of any revision of the second emissions budget should be to still meet the target of net zero emissions across all greenhouse gases by 2050.

Technology in the future may allow a more aggressive approach to emissions reduction.

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

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

It is essential that the Government sets out plans within timeframes 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?

Comment

GDP may not be the best economic measure to indicate how the New Zealand economy might be impacted by various actions to meet greenhouse gas emission reduction targets.

Instead, it might be worth understanding the natural capital (economic value), associated with various forms of land use. Natural capital covers natural resources that form an asset class comparable to man-made physical and financial assets, and less tangible assets of human capital and social (and/or institutional) capital. It is primarily a stock measure, but it generates flows of goods and services of use to people and it both supplies current consumption and can be degraded by it <https://treasury.govt.nz/publications/dp/start-conversation-value-new-zealands-natural-capital-dp-18-03>

By measuring and monitoring changes in natural capital, over time, it could provide a better understanding of how shifts in land use impact on the New Zealand economy. If GDP is flat or has risen minimally over time, then the state of natural capital over the same period may show a different and more accurate story of how the economy is shifting in response to climate change mitigation measures.

After the earthquakes in Canterbury, it was widely stated that this had resulted in an increase in New Zealand's GDP. Similarly, recovery from climate extremes such as major storm events are expected to see increases in GDP. So using this to model the economic performance of the New Zealand economy through to 2050 cannot indicate how robust or stressed the economy is. Modelling should look for other economic indicators that will be able to account for changes imposed by climate extremes or responses to legislative requirements imposed by the Zero Carbon Bill.

The Treasury's Living Standards Framework which uses a four capitals approach; Natural Capital, Human Capital, Social Capital and Financial/Physical Capital, may be a better measure to use than just GDP.

Councils are an important collaborative partner for Government in the development of the plans that will affect their local communities. Councils should be a key stakeholder for Government to work with on the development of the plans to meet the emissions budgets.

Councils are important for Government to partner with because they are close to and understand their local communities, they develop and operate transport systems and generally have space to potentially plant trees for off-setting. The

majority of people in New Zealand live in urban settings so cities will be significantly affected by the plans to meet the emissions budgets. Therefore it is crucial Councils are collaboration partners with Government with the development of the plans and the implementation of the plans.

Christchurch City Council wants to collaborate with the Government on these plans.

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

The Climate Change Commission would be the best agency to do this with the assistance of technical experts. The Commission needs to be a transparent and independent agency.

Council recommends that appropriate mechanisms are developed that hold the Government to account for decisions made.

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

It is important that the Climate Change Commission has a strong advisory role to the Government and that the Government is required to respond to the Commission's advice. The Government's response reports should be published and made publically available.

The decision on the NZ ETS needs to be made through the democratic process.

Council recommends that appropriate mechanisms are developed that hold the Government to account for decisions made.

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

The Commission needs a wide range of technical experts to achieve its intended aims.

Council recommends that social health expertise is included on the Commission. It is also important to include diversity of thought in the expertise represented on the Commission and having the ability/expertise to bring the community along with the Zero Carbon Act programme of work.

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

It is essential that the Zero Carbon Bill includes adapting to climate change to ensure there are Government climate adaption plans that include actions, delivery timeframes, responsibilities and the support required for implementation.

Council is supportive of including adaptation in the Zero Carbon Bill. It is essential to connect the mitigation and adaptation conversations nationally, providing the context for New Zealand's response to climate change. The reference to both mitigation and adaptation is consistent with the Paris Agreement and the UK Climate Change Act.

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

It is essential that a Government co-ordinated national approach is taken on climate change adaptation based on up-to-date scientific information.

The Council supports the proposed new functions to develop a national climate change risk assessment and national adaptation plan. The benefits of assessing risks and having an adaptation plan at a national level provides clear strategy and priorities for all levels of Government, local government, businesses and for all New Zealanders. There needs to be a regular review of progress towards implementing the national adaptation plan. The review reports should be published and made publically available.

It is essential that local government is involved in the development of both the risk assessment and national adaptation plan, given its role in adaptation alongside communities and the need to ensure there are not inconsistencies at different levels of governance. The adaptation plan should provide clarity around expected roles and responsibilities for adaptation and recognise the need for local communities to retain flexibility and decision making. It will provide a useful tool for co-ordination and building capacity in adaptation.

The Council supports the proposal that the Government holds responsibility for the national adaptation plan with the Climate Change Commission providing a review function.

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

Sharing information is critical as it enables organisations to learn from each other and subsequently adapt their activities more rapidly without all having to undertake costly research investigations.

Requiring selected organisations to provide information to the Climate Change Commission on their exposure to climate change risks is important. The Commission would need to develop and provide a standardised methodology reporting tool for organisations to use to report on their exposure to climate change risks.

The Commission would also need to provide advice to the organisations on how to report and how frequently. Reporting timeframe requirements need to be defined, e.g. reporting required every two years.

The Commission would need to involve and consult with organisations, that are required to report to the Commission, on what the level of detail will be required for the reporting and can the reporting align with existing reporting methods where possible.

It is recommended that all organisations that have a significant exposure to climate change risks report to the Commission, e.g.

- Insurance companies
- Banks
- Businesses with significant exposure
- Government agencies – e.g. NZTA, Housing, Defence etc
- District Health Boards
- Councils

The Council supports setting up an adaptation reporting power. It would provide transparency and clarity around climate change risks and inform Government on what priorities to focus on. The reporting from organisations should be published and made publically available.

Climate Change Adaptation Funding

The Council is supportive of the establishment of an anticipatory adaptation fund at the national level to improve local level and community participation in responding to climate change. This would assist with the cost and affordability for communities, business and Councils in adapting.

Consideration should be given as to whether it is appropriate to include the establishment of such a fund within the Zero Carbon Bill, although it is recognised that the Climate Change Adaptation Technical Working Group has recommended initial work is needed before decisions are made around funding. However, local government is already working with communities on adaptation. The existence of funding for adaptation as soon as possible would assist with these conversations and planning for the future.

Additional Information

Christchurch City Council Climate Change Commitments

Christchurch City Council welcomes the opportunity to provide a submission on the Zero Carbon Bill Discussion Document. Council has recognised the need to transition to a low emissions economy and has implemented the following initiatives.

Council will be developing a Climate Change:

- Policy Statement.
- Mitigation Strategy and Mitigation Action Plan.
- Adaptation Strategy and Adaptation Action Plan.

Council has agreed to Climate Change commitments including:

- Signing-up to the Global Covenant of Mayors for Climate and Energy in December 2017 which requires a Climate Action Plan and Adaptation Plan to be developed for the city.
- Setting a target to be net carbon neutral by 2030 for its activities.

Christchurch City Council Climate Change Mitigation Initiatives

Preliminary results from the Christchurch Community Carbon Footprint for the 2016/2017 financial year indicate that transportation was the highest sector contributing to Christchurch's greenhouse gas emissions over this reporting period. The majority of the transportation emissions are a result of road transport, with petrol use contributing 20.7% and diesel use 20.5% to Christchurch's gross emissions (this includes a small percentage of emissions from off-road transport and recreational boating). Therefore targeting the reduction of transport related greenhouse gas emissions is a Council priority.

Council has implemented a range of greenhouse gas emission reduction programmes of work including:

Resource efficiency and greenhouse gas emission programme for Council's activities

This programme includes the implementation of:

- An internal Council Policy.
- A Management Team and Programme Team Structure to deliver on the policy.
- Measurement and management framework for energy use, GHG emissions, solid waste generation and water use from Council activities.
- Achieved Energy-Mark Gold (ISO 50001) – Energy Management certification and CEMARS - Carbon management certification. Council was the first organisation in New Zealand to achieve Energy-Mark Gold certification.

Council's Target Sustainability services for businesses

Council provides advice to Christchurch businesses on energy efficiency, renewable energy, GHG emission reduction, solid waste reduction, water efficiency, battery electric vehicles and charging infrastructure.

Council initiatives - Electric vehicles and charging infrastructure

- Christchurch 100% battery electric car sharing scheme – Council initiated, researched and developed this city-wide scheme for Christchurch businesses and the public.
- Battery electric buses – Council worked with Red Bus on researching available battery electric bus technology. Three battery electric buses will provide the bus service between the CBD and the Airport by March 2019.
- Council will launch an electric vehicle outreach programme for Christchurch businesses and residents.
- Council designed the New Zealand electric vehicle charging symbol and worked with NZTA to gazette this symbol for use as signage.

- Council has a programme of work rolling out electric vehicle charging infrastructure on Council parking sites.
- Council is working with businesses, with a Christchurch Agency for Energy grant programme, to install electric vehicle charging infrastructure in their public car parks and for them to use the correct electric vehicle charging vertical and horizontal signage in their car parks.
- Christchurch was awarded by EVworld: The 2017 Most EV Friendly Town of the Year Award.
- Council has worked with Conferenz to bring to Christchurch an EVworld South event which will be on the 23rd and 24th November 2018.

Major Cycle Routes/Walking/Public Transport

Council is building a network of Major Cycle Routes connecting suburbs, shopping areas, businesses and schools. Christchurch was awarded the inaugural 2017 New Zealand's Favourite Places to Ride Top Cycling Town award.

Encouraging residents to walk, cycle and use public transport is one of the key actions required to reduce greenhouse gas emissions from transport.

Healthy Homes Canterbury

Since the Canterbury earthquakes Council has led a Build Back Smarter programme which included assistance to residents with improving home energy efficiency. This programme has now developed into an Environment Canterbury and Christchurch City Council Healthy Homes Canterbury initiative which will provide advice and financial support to improve the health and energy efficiency of homes in Canterbury from September 2018.

Government Climate Change Commitments

Christchurch City Council has and is undertaking a number of climate change initiatives and commitments. Council would welcome working closely alongside Government in the development of the mitigation and adaptation plans because of the impact these plans will have on the local community and because collaboration between Council and Government should provide a better outcome for the Christchurch community.

Council encourages the Government to urgently address climate change mitigation opportunities and recommends that Government:

- Supports a significant increase in the uptake of zero tailpipe emission vehicles in New Zealand.
- Supports a significant increase in the investment in public transport and in cycleways.
- Addresses the building code to include industry best practice energy efficient requirements in the code.

Thank you for receiving the Christchurch City Council submission recommendations and we welcome any opportunity to provide further comment to the Government.

The Council wishes to be heard in relation to its submission.