

16 July 2018

Ministry for the Environment
PO Box 10362
Wellington 6143

By email: ZCB.Submissions@mfe.govt.nz

Zero Carbon Bill Discussion Document

Dear Sir/Madam

The New Zealand Medical Association (NZMA) wishes to provide feedback on the above consultation. The NZMA is New Zealand's largest medical organisation, with more than 5,000 members from all areas of medicine. The NZMA aims to provide leadership of the medical profession, and to promote professional unity and values, and the health of all New Zealanders. Our submission has been informed by feedback from our Advisory Councils and Board. We begin by highlighting the links between health and climate change before providing our position on the proposed Bill. Next, we identify key aspects of the Bill that we believe need amendments. We then provide responses to specific consultation questions. We conclude by drawing attention to some developments to mitigate climate change by the health sector.

In summary:

- We strongly support the development of a Zero Carbon Act.
- Effective mitigation of climate change represents a significant opportunity to improve health, including health equity.
- We seek legislation that sets a target of net zero emissions across all greenhouse gases by 2040. This timeframe reflects the urgency of the science and the principle of global fairness.
- We support an independent Climate Change Commission that sets emissions budgets and has expertise across a range of areas including health.
- The institutional framework to support the Zero Carbon Bill must be founded on partnership obligations under the Treaty of Waitangi.

The links between climate change and health

2. Our association has a longstanding and strong interest in the links between climate change and health. In addition to our 2015 position statement on Health and Climate Change,¹ we have endorsed the New Zealand College of Public Health Medicine (NZCPHM) policy statement (and supplements) on Climate Change,^{2,3,4} and joined calls by other health organisations for a joint call for action on climate change and health.⁵ We have also made a number of previous submissions on this area, including to the Ministry for the Environment.⁶

3. Climate change is a serious and leading threat to health and health equity, both in New Zealand and worldwide. Indeed, a report in *The Lancet* identified climate change as the biggest global health threat of the 21st century.⁷ Nevertheless, well planned and effective measures to mitigate climate change can have substantial health (and health equity) co-benefits;⁸ tackling climate change could be the greatest global health opportunity of the 21st century.⁹ For example, a shift to active and public transport, a diet with less red meat and animal fat, and improved housing energy efficiency can, in addition to reducing greenhouse gas emissions, bring about substantial health and health equity co-benefits, including reductions in type 2 diabetes, heart disease, road traffic accidents, cancer, respiratory disease, and improvements in mental health.¹⁰⁻¹⁴ The financial costs of responding to climate change will be offset by the cost savings of such health co-benefits. We attach the paper *Health benefits and savings of equitable climate mitigation in New Zealand* for further details.

Our position on the Zero Carbon Bill

4. We note that the Zero Carbon Bill¹⁵ is proposing to: i) set targets to reduce our greenhouse gas emissions; ii) introduce emissions budgets to reach these targets; iii) set up the institutions to provide independent, expert advice and hold governments to account; iv) better understand the risks and to plan for how we adapt to climate change. The NZMA strongly supports the development of legislation that puts a new emissions reduction target into law and establishes the independent institutions necessary to set emissions budgets, monitor progress and hold governments to account. Such legislation is an important measure towards protecting and improving the health and well-being of New Zealanders.

5. While we welcome the development of the Zero Carbon Bill, we believe that there is an opportunity to improve key aspects of this important legislation as currently being proposed. In particular, we contend that there needs to be even greater urgency around the proposed timeframes that better reflect the global urgency of mitigation based on the science, the health gains from equitable mitigation, and the principle of global equity / fairness. We also believe that institutions the Bill will establish must ensure obligations under the Treaty of Waitangi are adhered to, and need to place health and equity considerations at the heart of decision making. We expand on these points and provide responses to specific consultation questions in the following paragraphs.

6. The NZMA seeks a target of net zero emissions across all greenhouse gases before 2040, set in legislation. We believe that targets and timeframes for emissions reduction should be based on the most up-to-date climate science, our international obligations, and principles of global equity / fairness. New Zealand has signed and ratified the 2015 Paris Agreement in which all countries committed to limiting average temperature rise to well below 2°C – and to pursue efforts to limit temperature increase to 1.5°C. Since then, the second draft of the Intergovernmental Panel on Climate Change (IPCC) Special Report on Global Warming of 1.5°C finds substantial differences in the harmful effects of global warming limited to 1.5°C compared with 2°C¹⁶ – where the 0.5°C warming difference is critical for vulnerable regions.¹⁷ Limiting

global warming to 1.5°C is therefore crucial, but will likely require global anthropogenic carbon dioxide emissions to reach net-zero before 2040,¹⁸ together with rapid reductions in other emissions, particularly methane.

7. New Zealand's efforts at mitigating climate change must take into account the principle of global equity and fairness. The Paris Agreement included the principle of 'common but differentiated responsibilities and respective capabilities'. The least developed and developing countries are disproportionately affected by climate change despite having contributed the least to climate change. They also have the least capacity to adapt to climate change, let alone mitigate. Established economies like New Zealand have historically had high greenhouse gas emissions and have benefited from activities that cause high emissions; they are in a position, and have a responsibility, to mitigate past actions and contribute rapidly and proportionately more reductions than nations with historically lower emissions. Established economies also have greater economic capability to make the adjustments that are needed to reduce emissions. New Zealand has a particular responsibility to protect the health of the small Pacific Island Countries who are being hit first and worst by climate change.

8. There are many models and ways to share emissions and efforts to get to net zero emissions safely across countries that account for historical emissions and wealth. Such modelling, using frameworks like the Climate Equity Reference project, indicate general timelines for New Zealand of between 2022 and 2038 to reach net zero emissions. This is based on both our historical responsibilities and obligations, and our capacity to adapt and mitigate, when compared with other countries. We refer officials to the attached paper *Setting ambitious greenhouse gas emissions targets for New Zealand – the case for international fairness / equity* for more details including references, rationale and modelling assumptions.

9. We believe that an all-gases approach to emissions reduction is needed, mainly because of effects beyond the atmosphere. Three of New Zealand's main greenhouse gases, carbon dioxide, nitrous oxide and methane, continue to damage our climate and/or oceans for hundreds of years or more. Short-lived greenhouse gases such as methane contribute to sea level rise through thermal expansion over much longer time scales than its atmospheric lifetime.¹⁹ This is of particular importance because of the links between sea level rise, ocean temperature and climate change. The draft IPCC Special Report on Global Warming of 1.5°C makes special mention of methane, calling for rapid reductions in other gases (as well as reducing carbon dioxide to net zero), particularly methane.¹⁶ It is essential for the targets in the Bill to reflect the final findings of this report, due in October 2018.

10. We welcome the proposed establishment of an independent Climate Change Commission that sets emissions budgets and recommends policies. While the Commission could also advise on adaptation, we believe that mitigation should be the primary focus. It is essential that the Commission reflects partnership obligations founded on the Treaty of Waitangi and has expertise across a range of areas including health and equity.

Responses to consultation questions

2050 target

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

Neither of the two options in the consultation document are satisfactory.* We believe the Government should set an emissions reduction target in legislation now, but the target date should

* The options given are: i) the Government sets a 2050 target in legislation now; ii) 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.

be brought forward to 2040 instead of 2050. It is important for the final legislation to be informed by the IPCC Special Report on Global Warming of 1.5 °C, due in October 2018, including the option to set even more ambitious targets if the report finds that global emissions need to be reduced more rapidly.

All sectors in New Zealand need certainty and transparency in order to act without delay to reduce emissions. This certainty is best afforded by a target that is set in primary legislation. The target and timeframe should be based on the most up-to-date climate science, our international obligations and the principles of global equity (see paragraphs 6-8). The target should also take into account the substantial co-benefits to health and health equity of fair and effective emissions reductions (see the attached paper *Health benefits and savings of equitable climate mitigation in New Zealand*).

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

We believe that the best target for New Zealand is net zero emissions across all greenhouse gases by 2040, adjusted for any new evidence in the IPCC Special Report on Global Warming of 1.5°C, which may support an even more ambitious timeframe. It is important to include total net emissions of all thermogenic gases including those not clumped under the ‘carbon’ term—in particular methane, given its effects beyond the atmosphere (see paragraph 9).

3. *How should New Zealand meet its targets?*

We believe that New Zealand should meet its targets by domestic net emissions reductions only (including from new forest planting, horticultural planting and improved soil health). We do not support using some emissions reductions from overseas for three main reasons. Firstly, international emissions units may be volatile in price. Secondly, relying on purchasing emissions reductions from overseas will undermine decisive domestic investment towards a low-emissions economy here in New Zealand. Thirdly, relying on international tradeable emissions units means New Zealand misses out on the wellbeing and equity co-benefits of reducing domestic emissions.

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

We believe that a 2040 target should only be revised to increase climate action in response to updated scientific recommendations. There must be no weakening of the target. We do not support incorporating a clause in this Bill allowing targets to be weakened. All sectors in New Zealand need certainty to take prompt and decisive action to support reduced emissions. A key finding from the Productivity Commission’s draft report was the importance of long term climate policy commitments through institutional, including statutory legal and regulatory, structures and processes.²⁰

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?*

Yes. We are strongly supportive of emissions budgets. These outline the shape of the emissions reductions trajectory and the target date. Both aspects are important. Whether net emissions reach zero rapidly or slowly strongly impacts total carbon budget. The sooner we start reducing emissions, the easier it is.

We support the proposed three five-year emissions budgets covering the next 15 years with a legislated target of net zero emissions across all greenhouse gases by 2040. This provides the certainty that is needed for investment and action in a low carbon economy now. Given the urgency of ensuring that global emissions peak by 2020,^{21,22} we suggest the Act could include a

requirement for the Climate Change Commission to urgently set an initial two-year emissions budget that would fit within the first five-year emissions budget.

6. *Should the Government be able to alter the last emissions budget (ie, furthest into the future)?*

The legislation should permit any Government to act so that New Zealand can emit less (but not more) than budgeted. Emissions budgets should not be able to be increased by the Government unless the Act is changed through the usual parliamentary process.

7. *Should the Government have the ability to review and adjust the second emissions budget within a specific range under exceptional circumstances?*

As we have stated above, we believe that the legislation should permit any Government to act so that New Zealand can emit less (but not more) than budgeted. Government's should not be able to cite exceptional circumstances as a reason to exceed emissions that have been budgeted for. Doing so would undermine the independence of the Climate Change Commission and the certainty that budgets create. If there are exceptional circumstances, modifications must require the usual Parliamentary process to change the Act. It is difficult to envisage exceptional circumstances that justify delaying climate action given the far-reaching and profound risks of doing so.

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?*

When advising on and setting budgets, the physics of climate change should come first—the bottom line is what ends up in our shared global atmosphere and oceans. Accordingly, key considerations must include scientific knowledge about climate change including sea level rise and ocean warming and acidification. It is also essential to consider obligations under the Treaty of Waitangi, and global leadership, including international equity.²³ Health considerations, including substantial health co-benefits, must also be paramount. Consideration also needs to be given to preventing / minimising any carbon 'leakage' (ie, preventing / minimising the transfer of high emissions industry from New Zealand overseas).

Government response

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

Yes. The Bill must require the Government to respond to emissions budgets by publishing plans to stay within budget as soon as is feasible—ideally no later than 6 months after a new budget and certainly before 12 months.

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?*

There are a number of important issues to consider in setting plans to meet emissions budgets. Paramount are obligations under the Treaty of Waitangi, fairness and impacts on Māori.

Health equity is essential in planning and monitoring of emissions budgets. Overall, mitigation strategies must contribute to achieving equity by improving outcomes for Māori and other groups experiencing disadvantage and discrimination. All regressive policies (including ETS settings) must be effectively offset for vulnerable communities.

The substantial co-benefits to health (and health equity) from well-designed reduction and mitigation measures must be considered. Climate action that prioritises health equity has significant potential to reduce existing, and prevent future, health inequities (eg, retrofitting

insulation to make homes warm and dry can reduce childhood asthma and chest infections - as leading causes of hospital admissions, particularly for Māori and Pacific children). Health benefits from zero-carbon public and active transport include increased physical activity, improved social connections and more equitable access to education and employment. The financial costs of climate change responses can be offset by the cost-savings of such health co-benefits.

When designing measures to address climate change, it is useful to value the concepts of kaitiakitanga (guardianship), aroha (love/compassion), manaakitanga (caring), whakatipuranga (future generations), hauora (health and wellbeing), and tika (integrity/doing what's right).

Other considerations include sustainable economic opportunities and technology relevant to climate change, to support a fair, just, sustainable economy.

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?

Yes. We support the establishment of an independent Climate Change Commission with decision-making (rather than simply advisory) ability to set emissions budgets. This could be modelled on how the Reserve Bank functions by independently setting the official cash rate. In addition to setting emissions budgets, the Commission could also advise on how to stay within budgets, how to best adapt to climate change, and should monitor progressions on emissions reduction.

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

We suggest the Commission should advise the Government on ETS policy settings so that emissions are within budget. The Commission must also identify the extent of regressive impacts from proposed ETS settings, and propose effective complementary policies which fairly compensate vulnerable households.

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, but health (and health equity) expertise is also essential amongst Climate Change Commissioners and staff. We believe that the Commission should have a structural component to ensure obligations under the Treaty of Waitangi are adhered to. The Commissioners should be sector experts, with a high level of standing in society.

It is important that vested commercial interests are not part of the Commission, particularly those with a financial interest in maintaining the health-harming status quo. In health, we have seen too many crucial policy processes derailed by those who have a financial stake in continuing to do harm.

Adapting to the impacts of climate change

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

Yes. However, adaptation should be a separate advisory work stream to avoid diluting the Commission's top priority which should be mitigation of climate change.

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. We support the following proposed provisions to help adapt to climate change:

- a national climate change risk assessment
- a national climate adaptation plan
- regular review of progress towards implementing the national adaptation plan
- an adaptation reporting plan.

Mitigation and adaptation are often deeply interlinked, and can frequently be addressed together in the same policy (eg, housing). Care must be taken when designing adaptation policies to ensure that climate-damaging emissions are not increased. We believe that adaptation should be dealt with by a separate working group to avoid distracting from the top priority of mitigation.

We support the development and implementation of a health adaptation plan that covers both health sector adaptation and health-protecting adaptation in other sectors.

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. A targeted adaptation reporting power could start with voluntary reporting in the first year, and require compulsory reporting in subsequent years.

Health Sector Considerations

In recent letters to DHBs²⁴ and PHARMAC,²⁵ the Minister of Health has set out his expectations for the health system to implement a strong response to climate change. The Minister goes on to state that: “Plans to address climate change and health need to incorporate both mitigation and adaptation strategies, underpinned by cost benefit analysis of co-benefits and financial savings”. We welcome the importance given by the Minister to climate action by the health sector.

We believe that the health sector can lead the way for the public sector in terms of the transition to a net zero greenhouse gas emissions future. The health sector in New Zealand has been making good progress in measuring and reducing their carbon footprint. We believe that these efforts can continue and accelerate even before the passage of the Zero Carbon Act. We draw attention to achievements to date and call for support to enable the health sector to reach net zero emission as early as possible. We ask that savings from reduced health sector emissions be invested towards better healthcare.

Many DHBs employ sustainability officers and some DHBs have already joined the CEMARS (Certified Emissions Measurement And Reduction Scheme) programme. We support further collaborative efforts across the health sector to accelerate progress towards reduced greenhouse gas emissions. We contend that all DHBs should join the CEMARS programme to use the same definitions and measures to work together and learn from each other, to accelerate each other’s progress in reducing greenhouse gas emissions, improve health outcomes and reduce costs. We also support moves to adjust national procurement requirements to mandate PHARMAC and other public-sector procurement agencies to account for environmental and social costs in their purchasing processes.

We believe that the detailed business cases for capital investment in new healthcare facilities and across the public sector should include options to reduce their carbon footprint and clearly define the long-term savings in operational costs and improved productivity that arise from differing

levels of upfront investment in the design and build process. The Ministry of Health should actively promote and assist DHBs in this work.

We agree with calls by other health organisations that a consistent approach typified by the CEMARS methodology of target setting, measurement, management and third-party independent verification of progress to reduce greenhouse gas emissions should be adopted by the entire New Zealand public sector for those very same reasons. Such an approach could be run as a formal improvement collaborative with a clearly stated goal, a method of improvement and measures to assess progress.

We hope that our feedback on the Zero Carbon Bill has been helpful and would welcome further opportunities to contribute to the development of this important legislation.

Yours sincerely



Dr Kate Baddock
NZMA Chair

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Supporting Attachments

Health benefits and savings of equitable climate mitigation in New Zealand

Setting ambitious greenhouse gas emissions targets for New Zealand – the case for international fairness / equity.