

DRAFT Submission to the Climate Change Response (Zero Carbon) Bill 2019

Engineering New Zealand (formerly IPENZ) is New Zealand's peak professional body for engineers. We are New Zealand's strongest and most influential voice on engineering issues. Our membership is growing, with more than 23,000 members who want to help shape the public policy agenda.

WE WELCOME THE BILL AND COMMISSION

Engineers work at the heart of all New Zealand's infrastructure, processes and systems. Our response to the massive challenges of climate change comes from our experience designing practical, innovative solutions and helping bring these solutions to life in partnership with our clients, communities and policy makers.

As we say in our publication *Engineering a Better New Zealand: Cleaner Energy*, our engineers now need to design tomorrow's low-emission energy systems for a future where sources of supply and demand are driven by technologies we can barely imagine.

We welcome the introduction of the Bill and strongly support the establishment of an independent expert-led Climate Change Commission.

TARGET SETTING

As stated in our submission to the 'Our Climate, Your Say' discussion document last year, we support the objective of net zero long-lived gases and reduced short-lived gases by 2050. This is because we can achieve this by re-engineering our energy, transport and building systems. However, there is a risk of emissions leakage from agriculture because the technology to reduce methane is not readily available.

We are thoughtful about the basis on which targets are set. Targets need to be based on science and bioengineering potentials. The biogenic methane targets in the Bill do not reflect the recommendations of the Parliamentary Commissioner for the Environment, no number for methane was included in the RIS, and we have not yet had sight of the report from the Interim Climate Change Commission on reducing agricultural emissions.

We agree with the Regulatory Impact Statement that “setting a quantified 2050 target in primary legislation would provide the greatest domestic signal and certainty”. We suggest that within the context of a ‘net zero carbon 2050’ overarching target, all other specific targets and emissions budgets be set by the Climate Change Commission. This is consistent with a science- and technology-led approach, allowing flexibility over time as innovation develops. It would also be consistent with the advice in the Regulatory Impact Statement for an Advisory-plus Climate Change Commission.

RISK ASSESSMENT, MITIGATION AND ADAPTATION

We welcome a National Climate Change Risk Assessment and National Adaptation Plan mandated in primary legislation with regular review. However, we suggest that a Climate Change Commission is best focused on mitigation. It is important that the proposed Commission focuses on the reduction of emissions and does not become subsumed by the considerable societal challenges of adapting to the impacts of climate change. Furthermore, there is a considerable overlap with the work of multiple agencies in the adaptation to the impacts of climate change. Co-ordination across these agencies will achieve stronger results.

We suggest that a National Climate Change Risk Assessment is a function of a Climate Change Commission, but that the Adaptation Action Plan should rest with existing Ministries, led by the Ministry for the Environment.

TO WRAP UP

Overall, we welcome these proposals. Transforming to a low-emissions economy requires our industries to innovate within a framework of consistent emissions prices and budgets. An effective and authoritative expert-led Climate Change Commission is a necessary condition for that transformation to be engineered.

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