



Date: Tuesday 2 July 2019
Time: 1.00 pm
Venue: Edinburgh Room, Municipal Chambers, The Octagon, Dunedin

Finance and Council Controlled Organisations Committee
OPEN ATTACHMENTS
UNDER SEPARATE COVER

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Tuesday 2 July 2019

Environment Committee
Parliament Buildings
Wellington

Tēnā koutou,

DCC SUBMISSION ON THE CLIMATE CHANGE RESPONSE (ZERO CARBON) AMENDMENT BILL

1. The Dunedin City Council (DCC) welcomes the opportunity to provide feedback on the Climate Change Response (Zero Carbon) Amendment Bill 2019.
2. The DCC supports the direction of the Bill overall, and urges the Select Committee to consider strengthening the Bill with an enhanced partnership approach to tackling this complex challenge.
3. There are significant opportunities, as well as challenges, in this space, and the Bill could drive a regenerative approach in addressing mitigation and adaptation by embedding the following key outcomes throughout:
 - delivering sustainable development;
 - improving wellbeing;
 - creating jobs and pathways to housing; and
 - regenerating environments.

WHAT'S HAPPENING IN DUNEDIN

4. The DCC has been responding to climate change since around 2005, with some key steps taken in terms of both mitigation and adaptation.
5. The DCC has had a net zero carbon target by 2050 for several years and put in place its first climate change adaptation plan in 2010. The DCC has also signed up to international commitments such as the Global Covenant of Mayors for Climate Change and Energy.
6. In June 2019, the DCC declared a Climate Emergency resulting in Council setting a new target of net zero carbon by 2030. The DCC has also established through this year's annual plan a Climate Resilience Work Programme to ensure a more coherent and coordinated approach to climate response for the city.
7. The practical steps to deliver on the ambitions of the community, both locally and internationally, are increasingly challenging. The current focus of the DCC is to drive critical adaptation and mitigation action through delivering its Climate Resilience Work Programme,

and to support the reshaping of business-as-usual activity and budgets to future-proof the city. The key elements of this work are:

- introducing climate resilient decision making;
 - improving climate change disclosure and reporting;
 - establishing a programme of climate resilience projects; and
 - building leadership through capacity building and funding.
8. This work is not straight-forward. Work by other partners, such as central government, to drive, facilitate and deliver input into these activities would help to unlock the potential of local government in driving delivery on national climate goals.
 9. To give a tangible example of what is ahead, climate change projections are already embedded in the DCC's 10 year plan significant forecasting assumptions, and in 2018 the DCC carried out a high-level carbon assessment of the draft Dunedin 10 year plan 2018-28.
 10. The next step in this process is to look at how to test the next 10 year plan for climate resilience. This would mean assessing not just carbon impact but adaptation impact in terms of activity that supports/detracts from an adapted city and also scrutinizes how plans would increase/decrease future adaptation risk. In addition, ensuring that proposals that come to council or committee for decision-making outside of the 10 year plan are similarly assessed. How to do this without significant time and cost impacts in a timely manner is a challenge, particularly if the aim is to do this comprehensively e.g. if assessments are to cover everything from a strategic destination plan to building a new facility.

PARTNERSHIPS FOR POSITIVE OUTCOMES

11. Delivery on Dunedin's strategic goals as a city is enabled and driven by established partnerships that include stakeholders and the community.
12. In DCC's recent responses to climate change, partnerships are proving to be essential in ensuring opportunities are realised, that communities are supported and empowered to work towards positive and regenerative outcomes, and activity is coordinated. Inclusive thinking has been invaluable, ensuring local context and knowledge are embedded, and actions are able to be taken forward collaboratively.
13. The DCC sees partnership with iwi as particularly important in climate change response, and in driving community conversations and decision-making. Ngāi Tahu's Climate Change Strategy, 'Te tāhū o te whāriki | Anchoring the Foundation,' is a critical direction-setting document for Dunedin.
14. In South Dunedin, the area of the city that is the current focus for adaptation activity, the community are working in partnership with other stakeholders including the DCC, Ngāi Tahu, the University of Otago, the Otago Regional Council and GNS Science. The DCC appreciates the steps that are being taken at the central government level to take a cross-cutting approach when it comes to responding to climate change. The DCC encourages any moves to strengthen this, recognising the critical interdependencies of many areas of work. For example, climate change objectives could be embedded into the purpose of Kāinga Ora to deliver low carbon communities and minimise adding new climate risks.

15. The DCC wants to highlight that, as the urgency to take action increases in the climate response space, local government can support central government to ensure communities are still empowered to take the lead in their future. There are existing levers to promote local government activity that could be refocused to promote climate change responses. For example, greater direction and input from Audit New Zealand on planning for climate change could help drive local government focus and activity.
16. The DCC also asks the Select Committee to strengthen the mandate for central government to partner with councils in the coordination of national adaptation planning. This will help in ensuring plans and policies are workable at the local level, and that delivery is shared amongst the many different players. It will also make use of the relationships that exist between local government and the community to address the climate change challenges.
17. Ultimately, the DCC believes partnership is critical for climate change mitigation and adaptation. The DCC wants to work with central government on:
 - developing a clear plan outlining roles and responsibilities for adaptation, including fiscal responsibility;
 - transitioning to a low emissions economy;
 - mechanisms to help local government understand and address the risks of climate change; and,
 - developing an adaptation decision-making legislative framework.

TOOLS AND TEETH

18. The DCC supports the sector-specific policies to reduce emissions and increase removals developed as part of the emissions reduction plan, which may include sector-specific policies to reduce emissions and increase removals. We look forward to any local government sector-specific policies produced. The DCC submits that the Bill should require the Minister to develop such a plan in partnership with local government, so that the specific policies that are developed will be workable for local government, and not result in any further inequity for communities and iwi.
19. The DCC supports moves to align carbon budgets with local government three-yearly planning cycles.
20. The DCC supports the adoption of a greenhouse gas reduction target of net zero by 2050 as it aligns with Dunedin's goals. The DCC is also encouraged by the proposal of a separate target to reduce emissions of methane within 24-47% by 2050. The DCC notes the differences between short and long-lived gases and to address both in different contexts given their effects. The DCC will look to adopting the same goal regarding methane to align with the national direction.
21. The DCC would like to see continuous research and guidance for dealing with methane from central government. The DCC acknowledges the ambitions of the agriculture sector to support the zero carbon target and appropriate guidance from central government will be needed to support and enable further action within this sector.
22. The DCC urges consideration of New Zealand's share of international aviation and shipping emissions being included in the Bill to enable decision-making that takes into account externalities that will affect climate resilience.

23. The DCC would like to see the Bill strengthened in terms of tangible consequences when it comes to stakeholders failing to meet targets. Currently the target and emissions budgets proposed are not enforceable by law, and therefore may or may not be taken into account in the performance of a public function, power or duty. To appropriately meet the requirement, targets and guidance need to be legally binding with enforceable accountability from everyone, including local government and central government.
24. Under the current proposal, a court may make a declaration if the targets and budgets are not met and an award of costs may be given. This approach to consequence does not address the reality of what would happen if the targets are not met. Not meeting the zero carbon by 2050 target will have significant effects on temperature rise, which in consequence will directly impact all communities, especially those most vulnerable to things such as sea level rise.
25. The DCC also foresees the responsibility falling onto local government as communities start to lobby for compensation because of the effects of climate change on their homes, businesses and amenities. Local government would benefit from guidance and advice from central government on how to incorporate the Bill's provisions in the performance of their functions, duties and powers to avoid future challenges and litigation risks for failing to consider mitigation and adaptation.
26. The DCC would like to see the National Adaptation Plan's core purpose reframed to create a framework that encourages genuine synergies between agencies and provides tools to deal with existing risks and prevent future risk. Many different agencies have begun work on climate change adaptation to maximise positive outcomes, avoid duplication of effort, and prevent wasted budget or mal-adaptation. Partnership must be encouraged at every possible point of the adaption journey.
27. Local government and other agencies require practical tools for assessing the climate impacts of policies, plans, proposals or other business as usual activities on future risk. Without this type of support, there is a risk of organisations continuing to make decisions at all levels that increase emissions, are at odds with adaptation activity, and add new risks.
28. The DCC would also like to encourage the Select Committee to consider funding and financing the costs of mitigation and adaptation in more detail. This is a long-term issue and work to investigate this could provide options to help drive delivery on the goals of the Bill. The opportunities to reshape business as usual budgets to better future proof our communities need to be explored. If mitigation and adaptation are addressed separately to day to day activities the mal-adaptation potential is high and the costs quickly become impossible.
29. The tangible transfer of good practice is an area where the DCC recommends the Select Committee could focus attention. To achieve this, the DCC would like the new Commission to establish contestable adaptation funds, in partnership with agencies such as the new Infrastructure Commission, Treasury and MBIE, where successful application is predicated on criteria such as partnership e.g. between councils, iwi, the community and other agencies, and minimising duplicated efforts. This type of approach would support activity and go some way to ensuring that New Zealand implements good practice when it comes to mitigating and adapting to climate change.

CONCLUSION

30. Climate change offers not only challenges, but also opportunities, to reshape the way we live and how we do business as usual to improve future outcomes for all.
31. The DCC overall supports the formation of this Bill as it is important to have a national framework for dealing with climate change. However, there are some issues that the DCC thinks the Bill should address. More specifically we would like to see a commitment to a collaborative partnership between local and central government to meet the desired goals outlined precisely and directly. The DCC would like to see the Bill amended to provide a more robust framework for local government and the rest of New Zealand to meet the stated targets.
32. The DCC looks forward to hearing the progress of the amendment bill as it is being considered by the committee and central government. The DCC looks forward to collaborating with government and the newly formed Climate Change Commission to achieve the targets and budgets set by this Bill.
33. The DCC wishes to speak to this submission.

Kā mihi,

Dave Cull
MAYOR OF DUNEDIN