

TE WAIORA



Nelson Marlborough
Health

**Select Committee
Climate Change
Response (Zero Carbon)
Amendment Bill**

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Submitter details

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu o Te Waka a Maui. NMH appreciates the opportunity to comment from a public health perspective on *Climate Change Response (Zero Carbon) Amendment Bill*.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.

General Comments

3. NMH strongly supports the proposed Bill to reduce the impact of climate change in New Zealand. Climate change is highly likely to adversely affect the health of New Zealand's people, environment and economy, in particular future generations. By planning across all sectors now, government agencies have the opportunity to be proactive and make effective changes that can reduce emissions and global warming. Reducing emissions of greenhouse gases through better transport, food and energy-use choices can result in improved health.¹
4. Health equity and climate change are inseparable. The magnitude of health impacts will vary by age, ethnicity, health status, geographic location (including those living in our neighbouring low lying Pacific countries and socio-economic circumstances with the greatest impacts falling on communities who have contributed least to greenhouse gas emissions.² It is important that any climate change adaptations or mitigations are fair and equitable to ensure that the most vulnerable are not disproportionately affected.
5. NMH supports the proposed amendments in relation to including provisions for iwi and Maori representative organisations, and that the Commission has members with skills, experience and expertise relevant to the Treaty of Waitangi. In addition NMH is pleased to see that there are provisions for inclusion of a strategy that mitigates the impacts of emission reduction on iwi and Maori. This

¹ <https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health>

² Bennett, H., King P., (2018) *Pro-equity climate change and environmental sustainability action by district health boards across Aotearoa/New Zealand*, New Zealand Medical Journal, August 2018

will ensure that emissions reduction plans will be equitable across different populations.

Strong Emission Targets

6. In response to the Ministry of Environment's consultation in 2018, NMH recommended that there were net zero emissions across *all* greenhouse gases by 2050. It is important that both carbon dioxide levels and methane levels are substantially reduced in order to ensure that we are able to keep within the global warming limit of 1.5°C. The current Bill has introduced separate targets for long and short lived gases. NMH notes that New Zealand's gross emissions increased by 2.2% between 2016-2017.³ These emission rates need to be decreasing. Therefore NMH advocates for stronger emission targets. NMH recommends that the net zero emissions target for greenhouse gases other than biogenic methane is changed from 2050 to 2040 (S50).
7. NMH recognises that methane is being treated differently within the Bill. The agricultural sector is hugely important in terms of the economic and social benefits that the sector provides. Methane reductions will place pressure on the agricultural sector therefore NMH recommends that further investment is provided for farmers and growers for research and on-farm initiatives to assist with the reduction of net emissions. This type of investment would result in broader environmental health improvements due to the reduction of nitrates and improved drinking water quality as a result of improved farming practices needed to reduce methane emissions.
8. In addition further funding could be given to future proofing and diversifying our food production system so that it is not as susceptible to extreme weather events. WHO has stated that climate change is expected to lead to modified bacterial, viral and pathogenic contamination of water and food by altering the features of survival and transmission patterns through changing weather characteristics, such as temperature and humidity. Climate change will result in more algal blooms in lakes which will interact with nutrient loading from fertilizer run-off in water bodies. This will bring about greater risk of vector-borne diseases for human and animals.⁴ From a public health perspective, NMH recommends that there are stronger biogenic methane targets of 24-48% by 2030 (relative to 2010), and 33-69% by 2050 (relative to 2010)(S50). These reductions would align the Bill with

³ <https://www.mfe.govt.nz/climate-change/state-of-our-atmosphere-and-climate/new-zealands-greenhouse-gas-inventory>

⁴ https://www.who.int/foodsafety/Climate_Change.pdf

the Intergovernmental Panel on Climate Change scenarios which are focused on reducing the initial production of greenhouse gases⁵.

9. Greenhouse gas emissions from the transport sector make up about 20 percent of New Zealand's total greenhouse gas emissions each year.⁶ Transport contributes heavily to NZ's emissions. The Ministry of Transport placed more stringent vehicle emissions standards in 2012 but a full review of emissions standards for both new and used vehicles is not yet taken place. The 2012 Health and Air Pollution in New Zealand (HAPINZ) report found that harmful emissions from vehicles cause 256 premature deaths (with social costs of \$934 million) annually in New Zealand⁷. NMH recommends that the Land Transport (Vehicle Exhaust Emissions) Rule is updated to reflect current European standards. The government has invested in active and public transport networks in the major cities but additional funding would be beneficial for regional towns. This would have positive benefits in terms of emissions, and people's health and wellbeing.

Specific Comments

Link between health and climate change

10. NMH supports the intention of the Bill to limit the global average temperature increase to 1.5⁰ Celsius above pre-industrial levels but would like to see the purpose of the Bill extended to include health. The World Health Organization has noted that the overall health effects of a changing climate are likely to be overwhelmingly negative.⁸ Therefore NMH recommends that health and wellbeing are included as follows in (S3) ...implement ...*climate change policies that improve overall population health and that contribute to the global effort under the Paris Agreement to limit the global average temperature increase to 1.50 Celsius above pre-industrial levels.*
11. This wording relating to health also needs to be included in clauses relating to the functions, duties and powers of the Climate Change Commission. This is shown as follows

⁵ <https://www.ipcc.ch/sr15/chapter/summary-for-policy-makers/>

⁶ <https://www.transport.govt.nz/multi-modal/climatechange/>

⁷ <https://www.transport.govt.nz/multi-modal/vehicleemissions/>

⁸ <https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health>

- a. S5H(1)(d)(i) [Members who have expertise relevant to] *the environmental, ecological, social, health, economic, and distributional effects of climate change and climate change policy interventions*
- b. S5L(c) [Matters Commission must consider] *the likely health and economic effects;*
- c. S5ZD(3)(a) [The Emissions Reduction plan must include] sector-specific policies to reduce emissions, improve population health and increase removals
- d. S5ZM(1)(a) [A national climate change risk assessment must] assess the risks to New Zealand's economy, society, health, environment, and ecology from the current and future effects of climate change.

12. It is noted that the interpretation section (S4) does not explicitly define "impacts" and "distributional effects" of mitigation or adaptation strategies in relation to looking at the possible benefits, costs and risks to environmental health. NMH recommends that the wording is amended for clarity.

13. NMH supports the introduction of a Climate Change Commission that advises and monitors New Zealand's progress as this highlights the importance of climate change matters. NMH agrees that the Climate Change Commissioners must have a range of essential and desirable expertise.

- a. In addition to those experts already stated in 5H(1), NMH recommends that a public health expert is included on the committee to give oversight regarding public health risks, the level of health benefits of any recommendation, and to assess the impacts for vulnerable populations
- b. NMH also recommends that the importance of Maori health is included into 5H(1)(d)(ii) *te Tiriti o Waitangi and te ao Maori (including tikanga Maori, te reo Maori, matauranga Maori, hauora Maori, and Maori economic activity*

14. NMH agrees with the Commission's functions, duties, and powers.

15. NMH supports that the Commission must act independently

The Bill must be enforceable

16. As it stands, the Bill does not include any powers of enforcement should government departments or other agencies not meet the targets. NMH recommends that Courts are given power to impose legal sanctions should targets not be met.

17. NMH recommends that S5ZJ is strengthened so that if targets and emission budgets are not met, then there are stricter penalties imposed

18. NMH recommends that S5ZK *2050 target and emissions budget are permissive considerations* is changed as follows:

2050 target and emissions budget are ~~permissive considerations~~ requirements

1. A person or body is required to ~~may, if they think fit,~~ take the 2050 target or an emissions budget into account in the exercise or performance of a public function, power...

19. NMH recommends that 5ZL Guidance for departments is strengthened as follows

The responsible Minister must ~~may~~ issue guidance for departments on how to take the 2050 target or an emissions budget into account in the performance of their functions, powers...

20. NMH recommends that S5ZV is strengthened so that Ministers can request certain organisations to provide information on climate change adaption and there are related penalties should organisations fail to provide information.

Conclusion

21. NMH thanks the Select Committee for the Environment for the opportunity to comment on *Climate Change Response (Zero Carbon) Amendment Bill*.

22. NMH believes that climate change is a major public health concern and commend the Government for its action in reducing the impact and the risk of climate change.

Yours sincerely



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