



19 February 2016

NZ ETS Review Consultation
Ministry for the Environment
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via e-mail: nzetsreview@mfe.govt.nz

New Zealand Emissions Trading Scheme Review 2015/16

Business Central represents business interests throughout central New Zealand from Taranaki across to Gisborne and down to Nelson. Business Central is one of the four regional organisations comprising New Zealand's peak business advocacy group, BusinessNZ. In Wellington, our organisation operates the Wellington Chamber of Commerce, accredited to the New Zealand Chamber of Commerce network. Our organisation also delivers ExportNZ to Wellington and the Hawke's Bay.

Business Central supports BusinessNZ's submission to the Ministry for Environment on the Emissions Trading Scheme Review (**attached**). Business Central wholly endorses BusinessNZ's comments.

While commending the Ministry on its consultation, Business Central believes there is a need for further consultation on this matter. A wider perspective must be taken to ensure policy is implemented in a way that does not impose costs of our business sector that are not faced by their trade competitors.

Business Central acknowledges pressures on New Zealand's government to adopt international practices however we strongly advise that this pressure should not draw away from implementing policies best suited to the economic circumstances of New Zealand's businesses.

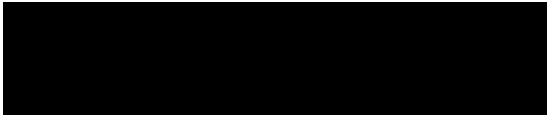
Business Central continues to endorse an emissions trading scheme, however the discussion document has raised concerns about the narrow, tactical perspective policy-makers may be using when considering this policy.

We note the absence of evidence regarding the relative contributions of the full suite of domestic climate change policy settings (such as energy efficiency, public transport, electric vehicles, research and development). As such, Business Central would encourage a more co-ordinated approach to this review to paint a clearer picture for businesses.

Business Central endorses BusinessNZ's recommendation for the Ministry to develop a more co-ordinated, coherent strategic approach to climate change policy settings, by incorporating a full suite of domestic climate change policy settings, and establishing a cross-portfolio Ministerial Climate Change Group.

We believe this will enable a clearer direction for the NZETS, and one which will attract greater support from the business community.

Yours sincerely,



John Milford
CE, Business Central