From:	[redacted]
To:	NZETSReview@mfe.govt.nz
Subject:	00209 Submission on the Emission Trading Scheme Consultation, Part 1 (Priority Issues)
Date:	Thursday, 25 February 2016 5:39:04 p.m.

Hi [redacted]

Thanks for accepting this late submission, as discussed today by phone:

Submission on the Emission Trading Scheme Consultation, Part 1 (Priority Issues)

Rosemary Penwarden

[redacted]

I submit that the ETS not be amended, but scrapped altogether, and a carbon charge be put in its place. We are fast running out of time to reduce greenhouse gas emissions sufficiently to retain a survivable climate for our children and grandchildren. We can no longer afford to tinker with this ineffective scheme.

The ETS has been counter-productive in reducing greenhouse gas emissions, but spectacularly effective at making a few speculators rich, at taxpayers' expense. Carbon credits are permits to pollute and the ETS is little more than a scam.

It is time to stop throwing more money at this scheme and use it instead on a simple price on carbon that will actually reduce emissions.

A carbon tax or fee system would be simpler and more transparent as polluters pay a decent price for their emissions to the government to support sustainable, low carbon initiatives. Another option would be a "carbon tax with 100% dividend", proposed by Prof. James Hansen, former NASA scientist. In this case, 100% of the tax is returned to the public, which with a regulated, rising carbon price would reduce fossil fuel demands and spur low carbon innovations over time.

The ETS should not be this Government's "main policy tool" to achieve its target of a 30% reduction in emissions by 2030. The discussion document says
it has been ineffective in influencing
investment decisions due to the low carbon price and transitional measures, particularly in non - forestry sectors. Even phasing out the one-for-two transitional measure will not reduce emissions sufficiently to meet this (ridiculously inadequate) target.

The ETS has been used as an excuse to take away the ability of other key legislation that could (before amendment) reduce GHG emissions. Now the RMA prevents local government from taking climate change into account when considering an application for a new coal mine, for example. Local bodies get all the cost of dealing with the effects of climate change – sea level rise, storm surges, floods and droughts, yet have no ability to limit the causes. That is ludicrous, and by the year, by the month, by the day, as climate change impacts our world, this legislation is becoming morally untenable.

Another example: under the EEZ and Continental Shelf Act 20124 , the Environmental Protection Authority (EPA) must take into account "the economic benefits to New Zealand of allowing the application" but must not have regard to "the effects on climate change of discharging greenhouse gases into the air" (EEZ CS Act Section 59).

The Resource Legislation Amendment Bill is set to further weaken the RMA, EEZ CS Act and other legislation with changes "that would constitute major threats to the environment and to local democracy... moves to favour economic development over other interests." 6 ECO,

2015. Resource Legislation Amendment Bill: Multiple important law changes. (ECOlink, Nov-Dec 2015. http://www.eco.org.nz/uploads/ECOLink/ECOlink%20Nov-)

As a result of these exclusions, new fossil fuel extraction (both on and offshore) and other GHG intensive activities have been allowed to proceed, locking in decades long investments that are detrimental to the life-supporting climate and humanity's survival.

A case in point is the recent marine consent granted for Shell Todd Oil Services to drill new wells and continue gas extraction from the aging Maui gas field for another 35 years.

Surely, if the government is serious about reducing GHG emissions, it would strengthen all legislation to stop new climate damaging activities, especially long-term investments, and control the existing activities, rather than erode legislation to foster the proliferation of emission intensive activities.

Without a stable and gradually rising carbon price, there is no incentive for low carbon investment, notably forestry or renewable energy development and other innovations. There is little hope of delivering NZ's commitment at COP 21 or a just transition to a sustainable, low carbon society. 4. Unlike a carbon tax or fee which penalizes polluters, carbon credits are permits to pollute, now and into the future.