Submissions by The Climate Sceptics [TCS]

1. TCS submit there is insufficient scientific and economic justification for a tax on carbon dioxide emissions, so the rationale for a tax on carbon dioxide emissions has no basis. TCS offer documented contradictions to the theory of a prominent role of CO2 in global warming, economic analysis, and suggest viable strategies to pursue in the face of these uncertainties.

2. UNSETTLED, CONTRADICTORY SCIENCE

2.1. Downgrading of Projections

2.1.1. A new assessment of global mean sea level from altimeters highlights a reduction of global trend from 2005 to 2008: M. Ablain, A. Cazenave, G. Valladeau and S. Guinehut[1].

2.1.2. Sea level budget over 2003-2008: A reevaluation from GRACE space gravimetry, satellite altimetry and ARGO: A. Cazenave, K. Dominh, S. Guinehut, E. Berthier, W. Llovel, G. Ramillien, M. Ablain, G. Larnicol[2].

2.1.3. Recent energy balance of Earth: R. S. Knox and D. H. Douglass.[3]

2.1.4. Is There Evidence Yet of Acceleration in Mean Sea Level Rise around Mainland Australia? PJ Watson.[4]

2.1.5. Sea-Level Acceleration Based on US Tide Gauges and Extensions of Previous Global-Gauge Analyses: JR Houston and RG Dean.[5]

2.1.6. Recent Climate Observations: Disagreement with Observations, David Stockwell[6]

2.2. Dominance of the Sun

2.2.1. Is climate sensitive to solar variability? Nicola Scafetta and Bruce J. West[7]

2.2.2. Empirical evidence for a celestial origin of the climate oscillations and its implications, Nicola Scafetta[8]

2.2.3. Influence of Solar Activity on Earth's Climate, F. Christiansen[9]

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[1] http://www.ocean-sci-discuss.net/6/31/2009/osd-6-31-2009.pdf
[2] http://sciences.blogs.liberation.fr/home/files/Cazenave_et_al_GPC_2008.pdf
[3] http://www.pas.rochester.edu/~douglass/papers/KD_InPress_final.pdf
[4] http://www.jcronline.org/doi/abs/10.2112/JCOASTRES-D-10-00141.1
[5] http://wattsupwiththat.files.wordpress.com/2011/03/jcoastres-d-10-00157-1.pdf
[6] http://landshape.org/enm/files/2009/07/EE-20-4_7-Stockwell.pdf
[7] http://www.fel.duke.edu/~scafetta/pdf/opinion0308.pdf
[8] http://arxiv.org/pdf/1005.4639v1

2.2.4. Do models underestimate the Solar contribution to recent climate change? Stott P.A., G.S. Jones, and F.B. Mitchell[10]

2.2.5. Cosmoclimatology: a new theory emerges, Henrik Svensmark[11]

2.2.6. Using the Oceans as a Calorimeter to Quantify the Solar Radiative Forcing, Nir J. Shaviv[12]

2.2.7. On the Dynamics of Global Temperature, David Stockwell[13]

2.3. Unsettled Science of Climate Sensitivity

2.3.1. On the determination of climate feedbacks from ERBE data. Richard S Lindzen and Yong-Sang Choi.[14]

2.3.2. On the observational determination of climate sensitivity and its implications. Richard S Lindzen and Yong-Sang Choi.[15]

2.3.3. Cloud and radiation budget changes associated with tropical intraseasonal oscillations. Roy W. Spencer, William D. Braswell, John R. Christy, and Justin Hnilo.[16]

2.3.4. Potential Biases in Feedback Diagnosis from Observational Data: A Simple Model Demonstration: Roy W. Spencer and William D. Braswell.[17]

2.3.5. On the diagnosis of radiative feedback in the presence of unknown radiative forcing: Roy W. Spencer and William D. Braswell.[18]

2.3.6. On the Misdiagnosis of Surface temperature Feedbacks from Variations in Earth's Radiant Energy Balance: RW Spencer and WD Braswell.[19]

2.3.7. Greenhouse effect in semi-transparent planetary atmospheres. Ferenc M. Miskolczi.[20]

2.3.8. The Stable Stationary Value of the Earth's Global Average Atmospheric Planck-Weighted Greenhouse-Gas Optical Thickness. Ferenc Miskolczi.[21]

2.3.9. The greenhouse effect and the spectral decomposition of the clear-sky terrestrial radiation. Ferenc M. Miskolczi and Martin G. Mlynczak.[22]

2.3.10. Trends in middle- and upper –level tropospheric humidity from NCEP reanalysis data: Garth Paltridge, Albert Arking and Michael Pook.[23]

2.4. Unreliable Statistical Models

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[9] http://www.space.dtu.dk/upload/institutter/space/forskning/06_projekter/isac/wp_501a.pdf
[10] http://climate.envsci.rutgers.edu/pdf/StottEtAl.pdf
[11] http://www.space.dtu.dk/upload/institutter/space/forskning/05_afdelinger/sun-climate/full_text_publications/svensmark_2007cosmoclimatology.pdf
[12] http://www.sciencebits.com/files/articles/CalorimeterFinal.pdf
[13] http://vixra.org/pdf/1108.0004v1.pdf
[14] http://www.masterresource.org/wp-content/uploads/2011/06/Lindzen_Choi_APJAS_final.pdf
[15] http://www.legnostorto.com/allegati/Lindzen_Choi_ERBE_JGR_v4.pdf
[16] http://www.drroyspencer.com/Spencer_07GRL.pdf
[17] http://www.drroyspencer.com/Spencer-and-Braswell-08.pdf
[18] http://noconsensus.files.wordpress.com/2010/08/spencer-braswell-jgr-20101.pdf
[19] http://www.mdpi.com/2072-4292/3/8/1603/pdf
[20] http://www.met.hu/doc/idojaras/vol111001_01.pdf
[21] http://www.friendsofscience.org/assets/documents/E&E_21_4_2010_08-miskolczi.pdf
[22] http://www.met.hu/idojaras/IDOJARAS_vol108_No4_01.pdf
[23] http://onlinelibrary.wiley.com/doi/10.1034/j.1600-0870.2002.01382.x/abstract

2.4.1. A Statistical Analysis of Multiple Temperature Proxies: Are Reconstructions of Surface Temperatures Over the Last 1000 Years Reliable? Blakely B. McShane, Abraham J. Wyner.[24]

2.4.2. Panel and Multivariate methods for Tests of Trend Equivalence in Climate Data Series. Ross McKitrick, Stephen McIntyre, Chad Herman.[25]

2.4.3. A Comparison of tropical temperature trends with model predictions. David H. Douglass, John R. Christy, Benjamin D. Pearson, S. Fred Singer.[26]

2.4.4. Assessment of the reliability of climate predictions based on comparisons with historical time series. D. Koutsoyiannis, N. Mamassis, A. Christofides, A. Efstratiadis, S.M. Papalexiou.[27]

2.4.5. On the warming in the tropical upper troposphere: Models vs observations, Geophys. Res. Lett. Fu, Q; S.Manabe, and C. Johanson (2011).[28]

2.4.6. A comparison of local and aggregated climate model outputs with observed data. G.G. Anagnostopoulos, D. Koutsoyiannis, A. Christofides, A. Efstratiadis,N. Mamassis.[29]

2.4.7. Climate Change Attribution Using Empirical Decomposition of Climatic Data: Craig Loehle and Nicola Scafetta.[30]

2.4.8. Critique of drought models in the Australian Drought Exceptional Circumstances Report (DECR), David Stockwell[31]

2.4.9. Forecasting Effects of Global Warming on Biodiversity. Daniel B. Botkin, Henrik Saxe, Miguel B. Araújo, Richard Betts, Richard H.W. Bradshaw, Tomas Cedhagen, Peter Chesson, Margaret B. Davis, Terry P. Dawson, Julie Etterson, Daniel P. Faith, Simon Ferrier, Antoine Guisan, Anja Skjoldborg Hansen, David W. Hilbert, Craig Loehle, Chris Margules, Mark New, Matthew J. Sobel, and David R.B. Stockwell.[32]

3. THE POOR ECONOMICS

3.1. The treasury costing of the revenue to be raised from a tax on carbon dioxide emissions is inadequate in two respects:

3.1.1. The costings do not remove the possibility of a doubling of revenue from the tax. According to the National Greenhouse Emissions Reporting [NGER] there are 2 types of carbon dioxide emissions which will be taxed; Scope 1 and Scope 2 emissions which are determined by the nature of emissions; whether they come from energy generation [Scope 1] or energy use [Scope 2]. At the former NGER website, which has now been removed, all companies which had carbon dioxide emissions above a threshold were required to list their emissions under one of the two Scope categories. Many companies had

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[24] http://arxiv.org/pdf/1104.4002v1
[25] http://rossmckitrick.weebly.com/uploads/4/8/0/8/4808045/mmh_asl2010.pdf
[26] http://www.scribd.com/doc/904914/A-comparison-of-tropical-temperature-trends-with-model-predictions?page=6
[27] http://itia.ntua.gr/getfile/850/3/documents/2008EGU_ClimatePredictionPrSm_.pdf
[28] http://pielkeclimatesci.wordpress.com/2011/07/08/new-paper-illustrates-another-failure-of-the-ipcc-mullti-decadal-global-model-predictions-on-the-warming-in-the-tropical-upper-troposphere-models-versus-observations-by-fu-et-al-2011/
[29] http://pdfserve.informaworld.com/798817__928051726.pdf
[30] http://benthamscience.com/open/toascj/articles/V005/74TOASCJ.pdf
[31] http://landshape.org/enm/files/2010/10/Critique-of-DECR-EE.pdf
[32] http://www.aibs.org/bioscience-press-releases/resources/03-07.pdf

emissions in both categories so there are two possible duplications of the tax. The first is where a company has paid the tax pursuant to the energy it has produced and then will be liable for another tax on that company's use of the energy it has produced. Secondly, and more generally, companies which did not produce emitting energy but emit carbon dioxide while using that energy will be liable to pay a second round of tax on energy, which has already been taxed. This is effectively a tax on a tax.

3.1.2. The second inadequacy of the Treasury modelling is that it does not consider shrinkage of the Australian GDP. The Objects of the Draft Act state:

3.1.3. "(i) take action directed towards meeting Australia's 2 long-term target of reducing Australia's net greenhouse gas emissions to 80% below 2000 levels by 2050;"

3.1.4. In 2009 when PM Rudd was proposing an ETS to reduce emissions by 5% by 2020, the equivalent reduction of the carbon dioxide tax, the then NSW government commissioned Frontier Economic Modelling to analyse the effect of such a reduction on the Australian economy.[33] This modelling concluded that a 5% reduction in carbon dioxide emissions would cause a shrinkage in the Australian GDP of $2 trillion by 2050; that is, $50 billion per annum in today's dollars. An 80% reduction based on an extrapolation from the modelling would cause shrinkage of $32 trillion, or $800 billion per annum. This would equate to approximately two thirds of Australia's GDP in 2010. The Treasury Modelling does not take into account the shrinkage of Australia's GDP from the imposition of any carbon dioxide tax.

3.2. The use of the proceeds of the tax to subsidise unreliable energy sources will produce electricity shortages.

3.2.1. The carbon dioxide tax will provide $10 billion over 5 years to the Clean Energy Finance Corporation.[34] This money will be spent on mainly wind and solar power projects. These energy sources cannot supply base power at today's demand levels. Beyond Zero Emissions in their Stationary Energy Plan developed the blueprint for a wind and solar economy. Professor Barry Brook and engineers Martin Nicholson and Peter Lang analyzed this plan.[35] For wind and solar to provide adequate power would require current electricity demand to reduce by almost 50% by 2020. In addition, the replacement of the current coal, gas and oil energy supplies with wind and solar would cost between $855 billion and $4191 billion. Given the manifest inability of wind and solar to supply base load power it is inevitable that electricity shortages will occur shortly after the introduction of a carbon dioxide tax.

4. THE 'NO REGRETS' STRATEGY

4.1. Adopt 'no regrets' strategies to sustain base load power at improved efficiencies.

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[33] http://www.theaustralian.com.au/news/nation/ets-to-shrink-regional-growth/story-e6frg6nf-1225691476399

[34] http://www.tia.asn.au/news/media-activity/clean-energy-finance-corp-to-be-set-up

[35] http://bravenewclimate.com/2010/08/12/zca2020-critique/

4.1.1. An example would be Ultra Supercritical Steam Generation, which offers extra power from the same coal as existing coal fired power plants but with up to 30-40% less carbon dioxide emissions.[36] [37]

4.1.2. Another example would be improved Thorium and Uranium technologies, especially since Australia has a large share of the world's reserves of Thorium and Uranium.

4.1.3. A third would be to foster research and development in low energy nuclear reactions (LENR) as demonstrated by emerging commercialization of the ECat and Nichenergy technologies in Europe.[38]

5. FURTHER DEFECTS IN THE EVIDENCE AND POLICY OF AGW

5.1. The IPCC is a bureaucratic extension of the UN.

5.1.1. The Carbon Tax relies on the authority and consensus of the Intergovernmental Panel for Climate Change [IPCC]. Both the CSIRO and the Bureau of Meteorology [BoM] rely on the IPCC. In 2010 two major defects were found in the way the IPCC presents evidence to support AGW. TCS submits that policy based on the conclusions reached by the IPCC does not have a valid scientific justification.

5.1.2. The first defect involves the types of evidence used by the IPCC. This evidence is supposed to be of the highest quality, peer-reviewed standard. In fact up to 50% of the evidence used by the IPCC comes from non-peer-reviewed literature produced by such groups as Greenpeace and the World Wild-life Fund.[39]

5.1.3. The second defect was revealed by an audit of the IPCC by the InterAcademy Council [IAC].[40] The IAC showed that the standards of proof used by the IPCC were flawed. This meant the levels of certainty of the IPCC's predictions and conclusions could not be relied upon. This means that not only is the evidence used by the IPCC not of a uniformly high standard but the methods used by the IPCC to interpret that faulty data are themselves inadequate.

5.2. A body independent of both the CSIRO and the BoM should be set up and financed to examine the evidence for and against AGW.

5.2.1. In this respect TCS notes that an Audit Application has already been made to the Auditor General to examine potential bias in the official Australian temperature record.[41] To date no results of any audit pursuant to this Application have been made public. TCS submits that this audit should be expedited and the result made public. If the official temperature record has been 'adjusted' to make

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[36] http://www.worldcoal.org/coal-the-environment/coal-use-the-environment/improving-efficiencies/
[37] http://theclimatescepticsparty.blogspot.com/2011/07/selling-carbon-tax-in-never-land.html
[38] http://landshape.org/enm/renewables-wake-up-and-smell-the-rossi/
[39] http://hro001.wordpress.com/2010/04/14/uns-climate-bible-gets-21-fs-on-report-card/
[40] http://reviewipcc.interacademycouncil.net/report/Climate%20Change%20Assessments,%20Review%20of%20the%20Processes%20&%20Procedures%20of%20the%20IPCC.pdf
[41] http://jonova.s3.amazonaws.com/audit/anao-request-audit-bom.pdf

it warmer and consistent with AGW, without any scientific justification, then the bulk of the physical evidence to support AGW has been removed. Without this physical evidence there is no justification for a carbon dioxide tax.

5.3. The draft legislation of The Clean Energy Bill does not refer to either compensation or Australia's international obligations.

5.3.1. The government has stated that half of the proceeds raised from the carbon dioxide tax will be returned to households. The government has also said that 10% of all revenue raised by the tax will be given to a UN Green Climate Fund.[42] In addition the government will fund over the next 5 years $10 billion worth of renewable energy.[43] TCS submits that for these reasons and others the government will not be able to meet its compensatory obligations.[44]

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42 http://au.news.yahoo.com/thewest/a/-/latest/8916664/carbon-tax-billions-to-help-poor-nations/

43 http://www.tia.asn.au/news/media-activity/clean-energy-finance-corp-to-be-set-up

44 http://www.abc.net.au/unleashed/113676.html