

**From:** [laura gibbons](#)  
**To:** [Commission-Public-Records](#)  
**Subject:** [EXTERNAL] Testimony for the 3/9 Port Commission Meeting  
**Date:** Saturday, March 6, 2021 3:59:54 PM

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**WARNING:** External email. Links or attachments may be unsafe.

Here is my written testimony for Tuesday's meeting. I will not be able to present it live.

If you don't have time to read the whole thing at the meeting, here is a summary.

- It's no use trying to shift the burden of aviation emissions through cap-and-trade or offsets.
- Cap-and-trade sounds promising but hasn't worked because carbon emitters are skilled at working the system.
- Offsetting also is ineffective and problematic because it's basically carbon colonialism.
- Citations and details are provided in the written version.

Commissioners,

As I promised at the last meeting, here is more information about cap and trade, offsetting, and the general issue of shifting the burden of aviation emissions, rather than reducing it. I'm providing this because of your legislative report expressing support for cap-and-trade legislation.

Cap-and-trade sounds promising, but companies that generate emissions are good at getting around its requirements. California's biggest oil and gas companies have actually polluted 3.5% more since it started. They figured out how to lobby for the details that helped them "game the system"<sup>1</sup>. A government report found that "cap is likely not having much, if any, effect on overall emissions"<sup>2</sup>. 52% of companies regulated by the California program saw an increase in annual average greenhouse gas emissions — and those companies are largely situated in disadvantaged communities, historically hit hardest by environmental pollution<sup>3</sup>.

Another way to shift the burden of who aviation emissions is offsetting, termed a Modern Sale of Indulgences in a report by Stay-Grounded.org<sup>4</sup>. Here are some of their findings:

1. Offsets generally mean no real change in behaviors and policies, and are virtually useless in terms of emissions reductions.
2. According to an [Öko-Institut](#) study, only 2% of the offset projects have a high probability of resulting in additional emissions reduction.
3. Offsetting projects are largely located in the Global South and often lead to local conflicts or land grabbing.
4. Ultimately, offsetting is unjust and a form of carbon colonialism. To enable a small share of the world population to fly indefinitely with a clear environmental conscience, others bear the costs: people whose emissions are often already very low, whose historical contribution to climate change is negligible, and who are already experiencing the impacts of the climate crisis.

I hope you make good use of this information.

Sincerely,

Laura Gibbons  
Seattle

1. <https://www.propublica.org/article/cap-and-trade-is-supposed-to-solve-climate-change-but-oil-and-gas-company-emissions-are-up>
2. <https://lao.ca.gov/Publications/Report/3553>
3. <https://www.pbs.org/newshour/science/california-cap-and-trade-is-working-for-other-states>
4. <https://stay-grounded.org/emissions-offsetting-a-modern-sale-of-indulgences/>