

12 November 2021

Tasmanian Climate Change Office  
Department of Premier and Cabinet  
GPO Box 123  
HOBART TAS 7001

**Via email:** climatechange@dpac.tas.gov.au.

To whom it may concern,

## **RE: Climate Change (State Action) Amendment Bill 2021**

The Southern Tasmanian Councils Authority (STCA) welcomes the opportunity to provide feedback on the *Climate Change (State Action) Amendment Bill 2021 (the draft Bill)*. It also commends the genuine and wide-ranging consultation undertaken on behalf of the Tasmanian Government for the Independent Review.

Overall the proposed amendments to the Act for are supported.

It is considered that they strengthen the delivery of escalated statewide action to reduce greenhouse gas emissions; better support the transition to low carbon economy and increase resilience and adaptation planning for local government assets and across Tasmania's communities. Importantly they are considered to align to and provide a framework that enhances and reinforces on-going climate-action across the local government sector.

This feedback reiterates that provided by the STCA to the review of the CCA and Climate Action 21 (April 2021). We seek to further and consolidate our comments regarding:

*... the clear and demonstrated need for the Tasmanian government to provide systemic climate response applied across its functions and their varied roles in support private and public sectors in responding to climate change. ... complement and intersect with local government action, promote good governance, mitigate risks and increase resilience across local communities<sup>1</sup> ....*

*... urgent need for the Tasmanian government to formalise standardised and harmonised adaptation systems and processes... same format that local government delivers other jurisdictional functions such development planning, environmental health and emergency management whereby they have a head of power and clear processes/templates for that enable them to tailor for their local community circumstance and characteristics.<sup>2</sup>*

The STCA agrees with the Independent Review that the Act is largely silent on local government's role<sup>3</sup> although councils play a critical function in decarbonisation and building climate resilience across its operations and functions, and its communities. Tasmanian local government manage around 80% of the public road network and it estimated that natural disasters will conservatively cost Tasmania \$19 billion by 2060<sup>4</sup> which will impact across councils as they mitigate hazards on their assets, maintain services and assist communities to recover.

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<sup>1</sup> [https://www.dpac.tas.gov.au/\\_data/assets/pdf\\_file/0004/578272/STCA - Submission Act and Action Plan.PDF](https://www.dpac.tas.gov.au/_data/assets/pdf_file/0004/578272/STCA_-_Submission_Act_and_Action_Plan.PDF) p.3.

<sup>2</sup> ibid p.6

<sup>3</sup> Independent Review of the Climate Change (State Action) Act 2008 Final Report June 2021 p. 20.

<sup>4</sup> Deloitte Access Economics, 2021: Special report: Update to the economic costs of natural disasters in Australia Australian Business Roundtable for Disaster Resilience & Safer Communities; p. 12.

The STCA recognises the role of local government in responding to climate change. Over the past decade the STCA has developed data sets, tools and templates to support emission reduction and resilience (adaptation) plans. We are currently delivering a program to harmonise and standardise local government climate responses, informed by the council operational needs and the climate plans and strategies developed by a number of southern councils. We are sharing our experience, processes and resources with the councils of the Northern Tasmania Development as they prepare climate responses, to ensure consistency within the sector.

Our current climate program, and collaboration with NTD councils, directly aligns to Recommendation 7 for sector-based emission reduction and resilience plans. Additionally we would be significantly benefited by quinquennial statewide risk assessments that would critically inform our jurisdictional land-use planning, asset and emergency management functions.

As such the STCA advocates that the amendments:

- clearly formalise local government's role and responsibility in responding to climate change;
- provide for a consistent harmonised and complimentary climate response between State and local government; and
- are supported by resources/funding, guidelines and tools and reporting metrics leveraged from the sector.

The inclusion of local government within relevant sections of the Act would also address barriers to council action such as its decision-making and potential exposure to liability, as well as providing an authorising environment for climate action, which is currently largely discretionary.

The STCA's climate work program provides a natural and complementary fit to the broader Tasmanian Government's climate program specifically Recommendation 7. From a local government perspective it would harmonise action and provide a consistent approach that builds capacity, avoids duplication with other jurisdictions, is informed by based evidence science and avoid maladaptive and ad hoc responses.

The STCA strongly urges the Tasmanian Government to undertake genuine co-design and collaboration with the local government sector to realise the opportunities from the inclusion with this sector.

Please find following brief comments on the Recommendations. Should you require any further information or would like to discuss this submission please contact either myself or Katrina Graham, Senior Climate Officer, City of Hobart [graham@hobartcity.com.au](mailto:graham@hobartcity.com.au).

Yours sincerely

A handwritten signature in blue ink that reads "A. Green".

Mayor Alex Green

**CHAIR**  
**SOUTHERN TASMANIAN COUNCILS AUTHORITY**

## **1. Legislate a more ambitious emissions reduction target for Tasmania, of net zero emissions from 2030**

The STCA supports a state based target of net zero emissions by 2030.

It recognises that such a target will amplify mitigation efforts across all sectors; enhance local economies; scale effort and realise leadership across communities and sectors. It also considers that this will reinforce and illuminate local government

It notes the role that many Tasmanian councils have progressed or are progressing emission reduction targets and actions to reduce the greenhouse gas which they: are responsible for through the corporate assets and operations; are able to influence through engagement across communities and to contribute and advocate for broader state, national and international settings. Through these efforts councils have, and are, recognising cost savings across operations and assets, as well providing leadership to their communities.

The setting of statebased targets should take account of existing local government commitments, leverage from these where they exist and support the strengthening of these actions that contribute to the State target. They should be accompanied by clearly articulated roles and responsibilities to avoid duplication of effort and carbon accounting. Alongside legislative it's recommended that emission profiles are provided at municipal and/or postcode levels to enable greater transparency and avoid duplication of accounting confusion across communities and increase awareness of how all efforts contribute to

## **2. Consolidate the Act's existing objectives**

The STCA supports the consolidation of the Act's existing objectives

The proposed 5 Objects are considered to align to and resonate with the STCA's climate program which encompasses the themes of corporate and community mitigation, adaptation and resilience, and leadership.

The STCA acknowledges that whilst reducing greenhouse gas emissions is critical, efforts to respond to unavoidable climate change is equally critical. As such 'targets and reporting' should also be considered for the resilience and adaptation sphere.

## **3. Include a set of principles to guide climate action**

The STCA supports a set of principles to guide climate action

An additional principle, should be included, to the effect that climate action and strategies are co-designed and collaborative where it relates to, or intersects with key stakeholders.

## **4. Ensure relevant Tasmanian Government policies, plans and strategies are informed by climate change considerations**

STCA supports the integration of climate change considerations across State policies, plans and strategies.

It considers that this will provide clear leadership to other sectors and assist in integrating and mainstreaming climate action more broadly across communities.

This is the approach that is engendered in the STCA's climate program with facilitators specifically engaged to directly support councils to implement emissions reduction and climate adaptation actions across their strategic and operational function. This is critical to ensuring councils and their communities are climate ready and positioned to transition to low carbon economies.

## **5. Make the development of a Climate Change Action Plan a legislative requirement**

The STCA supports the development of Climate Change Action Plan (CCAP) as a statutory requirement.

## **6. Require a five-yearly statewide climate risk assessment to be completed**

The STCA supports the development of quinquennial statewide climate risk assessment from 2022 onwards.

This critical for councils to understand risk and manage their responses for this to be up to date information would provide an enabling environment for councils to consider their climate risk and develop local responses, provide for greater flexibility, inform key roles for landuse planning and emergency management and responsibilities of councils

The STCA has collaborated with Climate Futures Team to develop climate profiles updated in line with the latest climate archive. A State wide approach

## **7. Include the completion of sector-based decarbonisation (emissions reduction) and resilience plans**

The STCA strongly supports the completion of sector-based decarbonisation and resilience plans

This Recommendation aligns to the current climate work program of the STCA councils and Greater Hobart Councils that includes the development of corporate plans for emissions reduction and adaptation. It is suggested that local government sector is included in the sector-based plans that are leveraged through the STCA's work program. Critically this will provide a harmonise and consistent approach across this sector, enable the scaling of action across councils, avoid duplication of effort and transparency to communities and assist in the transition to low carbon economies and increased climate resilience.