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Submission: Tasmania's Draft Climate Change Action Plan 2023-25

In preparing this submission we have read the draft Plan, the Tasmanian Policy Exchange's "A blueprint for a climate-positive Tasmania", and "Soil" by Matthew Evans.

Our response is structured in the sequence the consultation questions are listed.

1 – Vision and goals

We support the vision.

We support the goals, and are most supportive of the following sub points relating to key opportunities:

- 100% EV government fleet
- increased public and active transport
- reduced organic waste to landfill by 50%
- improved management of landscapes
- reduced livestock emissions.

Whilst we support the establishment of new timber plantations, we would like a change of emphasis in how this method of land use could be improved re carbon sequestration with regard to a mix of species planted and harvesting methods to retain soil carbon (i.e. moving away from the clearfell and burn to more selective harvesting with a *hugelkultur*¹ technique applied with timber waste).

Suggested revision:

- improving timber plantation management to optimise their carbon sink value, expanding the adoption of agroforestry in Tasmanian farming systems and reducing the conversion of plantations to other land uses

We would also like to see an additional sub point relating to improved residential building standards. We understand the state has deferred the consideration of the 7 star NATHERS energy efficiency rating provisions until 2025 whilst UTAS is conducting research into minimising condensation. Building for 7 stars begins with good design and orientation, and we note the State's ability for orientation to be incorporated into planning scheme requirements. Also, once adopted, these ratings should be based on 'as built', as opposed to ratings of architectural specifications only.

Suggested additional dot point:

- strengthened planning scheme requirements for 7 star NATHERS building design and orientation.

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¹ hugelkultur is a technique where a mound constructed from decaying wood debris and other plant materials is later (or immediately) planted. It is suggested the technique helps to improve soil fertility, water retention, and soil warming, thus benefitting plants grown on or near such mounds.

2 - Priority Areas

We support the three priority areas. Given the three-year life of the plan, we think these are enough to focus on to get to 2025.

3 - Information and knowledge

Will the key actions help support decision making for you and your community or organisation?

Yes, they will be helpful, however we note that much of the information has been available for several decades, and still it is hard to find examples where or how that has translated into climate aware decision making at highest levels.

As active members of our community, we have appreciated the opportunity to access Government research and funding support for our group's activities. We look forward to continued support of this type. As we dream bigger of community batteries, and EV fast chargers that link into a local sub-network (like advocated for by Saul Griffith in his book "The Big Switch") we are finding it takes a lot of volunteer effort to lobby 2-3 levels of government, and energy providers, to get some significant demonstration projects in our community.

What types of projects should be supported under the final action plan?

Under the whole of Government Framework, following projects could be considered:

- In conjunction with financial budget, each Department be issued an annual carbon 'budget' - and required to report quarterly on its 'spending', and identify where it will achieve savings. A lot of this baseline data was prepared in 2008-09 by a consultancy (Parsons Brinckerhoff), and reported at a site level. The financial budget for agencies should include an annual reinvestment in the energy efficiency program, to demonstrate there is backing for this to be implemented.
- Having climate action (i.e. a modelled outcome of the proposal, or the alternatives or actions that have been identified to save carbon emissions) as an item that needs to be addressed within all budget bids and a plausible cost-recovery model be considered for carbon intensive projects.
 - One example that we think of in this respect is the significant cost associated with road upgrades to outer Hobart settlements - \$585m for the Bridgewater Bridge and the \$350m for South East Traffic Solution. All previous evidence suggests that when these projects are completed, there will be continued residential development in those locations that will generate traffic that fills the road space. Whilst increased EV adoption in coming years will offset some of the carbon in transport, there are still significant other carbon costs with the sprawled development pattern and infrastructure to service it. It would be interesting to know if a cost was imposed on use of these roads, whether that would significantly reduce traffic volumes (through avoided travel or mode switching) and have avoided the need to expand them at all.
- Climate-conscious critical thinking module with State Government leadership program.

We think there would be merit in the Government either organising or co-hosting an annual 'briefing + workshop' where the leaders of various community organisations are invited to hear from the TCCO, the Reference Group and/or relevant experts on research findings and progress or outcomes against the three priority areas.

4 - Transition and innovation

Will the key actions help support decision making for you and your community or organisation?

The success of BREP working with businesses to help them transition to a low emission economy is really impressive. We really like the collaborative problem solving approach.

We support the development of Emission reduction plans for key sectors.

We note that for sectors like Industrial processes and agriculture the options to maximise meaningful emission reductions are both difficult and complex, and are likely to require a distinct set of mechanisms to successfully achieve. Therefore the partnership approach of Government and industry working to identify where policy (or funding) can have the most benefit, while minimising the risk of adverse economic or social outcomes while making this transition.

As a household in the past four years we have purchased one electric cargo bike, and an EV. The stamps duty waiver was a minor incentive to the EV purchase. We find the cargo bike to be a great boon for our transport tasks, with its ability to carry up to 3 kids and ~120kg weight capacity on the rear section. We favour it for 'trip-chaining', when we have to drop kids to school and childcare, then continue onto the city or Glenorchy for work, social commitments and/or shopping needs (often up to 28km round trips).

Our community group organised a bulk purchase of both EVs and E-bikes, and both offers were well supported. We live in a community with reasonable household incomes, so that worked in our favour. We recommend the Government trial a few forms of incentive (i.e. direct subsidy to 10% of bike value, or zero interest loan similar to ESLS) to help lower income households purchase an e-bike, as this could be a viable alternative to a second car for many households.

Ties to that should also be a significant boost in funding for safer cycle infrastructure (AAA standard - all ages and abilities), to help the riders from 8 to 80 that are capable of riding to feel safe whilst doing so. As international evidence from places in Netherlands and Denmark shows, this is when the changes to rider demographics really start to be noticeable, with increased female and child participation.

5 – Adaptation and resilience

Will the key actions help support decision making for you and your community or organisation?

Yes, we support the Statewide Climate Change Risk Assessment, and would be very interested to know where our community sits in terms of its risk profile on a statewide basis.

With a significant amount of publicity relating to interstate shoreline erosion (Collaroy, Great Ocean Road), it is only a matter of time before similar issues are experienced here. We don't feel there is any real sense of urgency to curtail the coastal developments at present though, and that is a concern, given the future liability on the private landowners and the asset managers.

6 - Implementation, reporting and monitoring and evaluation

We support the proposed implementation plan with clearly outlined timelines, outputs and performance indicators.

Making Ministers responsible for the development of these plans for sectors of which they have oversight is a good move. We agree with the five primary sectors nominated, and the disaggregation of energy into two sub-sectors (energy and transport) to also develop plans.

We note that annual greenhouse gas emissions report for each sector and annual climate change activity statement are a worthwhile step forward.

As we have previously stated, Treasury guidelines should also look to reflect these goals and performance indicators. Examples include Better Practice Guidelines, Treasurer's Instructions and Procurement Principles. It is critical that the measures identified through the above action plans and risk assessments have the follow-through at a procurement level. Otherwise there is a risk the desired outcomes of the legislation (and associated plans) may be stymied through continued use of benefit-cost analysis or weighted evaluation that doesn't properly account for emission outcomes or climate risk.

We thank the Tasmanian Government for seeking our input – and look forward to the final plan being released later in the year.

Yours sincerely



Ben and Pen Clark