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Dear Sarah

Tasmania's Climate Change Act and Action Plan

Thank you for providing the Local Government Association of Tasmania (LGAT) with an opportunity to make a submission on the review of Tasmania's *Climate Change (State Action) Act 2008* (the Act) and development of Tasmania's next climate change action plan.

LGAT is incorporated under the *Local Government Act 1993* and is the representative body and advocate for local government in Tasmania. This submission has been prepared on behalf of our Members; all 29 councils in Tasmania. A number of individual councils are likely to make submissions to this process, which will reflect their specific local perspective.

We provided our preliminary submission to our member councils for comment, with a number providing support for the draft, or providing additional comments to inform our response.

Background

Local government activity to address climate change and impacts varies across the state. The southern councils, for example, are generally active and supported by the Regional Climate Change Initiative (RCCI) collaboration. The RCCI was established by the Southern Tasmanian Councils Authority (STCA)¹ to build the capacity of councils and their communities to respond to climate change.

Over several years, the RCCI has delivered a body of work to encourage collaborative action and guide a coordinated and consistent approach to climate change. While activity is less prominent in the north and north-west, momentum is building.

For example, in a recent member driven engagement process, responding to and mitigating the impact of climate change dominated local issues of concern. This engagement was part of the 21st Century Councils Project² that is focused on local government contemporary best practice and addressing existing and upcoming challenges, like climate change.

Then at the LGAT July 2019 General Meeting the following motion was passed by our members:

That the LGAT call upon the Federal and Tasmanian State Governments and Parliaments urging them to:

- a) Acknowledge the urgency created by climate change that requires immediate and collaborative action across all tiers of government;*
- b) Acknowledge that the world climate crisis is an issue of social and environmental injustice and, to a great extent, the burden of the frontline impacts of climate change fall on low income communities, vulnerable groups and future generations;
and*
- c) Facilitate emergency action to address the climate crisis, reduce greenhouse gas emissions and meet or exceed targets in the Paris Agreement.*

¹ <https://stca.tas.gov.au/>

² <https://www.lgat.tas.gov.au/member-services/lgat-advocacy/21c-councils>

This was one of two climate change motions put to the meeting, from two very different councils. The motion and the actions highlights:

1. Very different communities across Tasmania are increasingly viewing the series of bushfire, flood and coastal hazards events experienced as affirming evidence of decades of climate science.
2. Even communities removed from direct impacts of climate-related events care deeply for the welfare of not just their own local communities, but of their neighbours and the welfare of all Australians. This empathy is explicit in part (b) of the motion.
3. The urgent concern of Tasmanian communities to focus on meaningful collaborative action, particularly in terms of mitigation addressing what is seen as the root cause of climate-related intensification of hazards, being greenhouse gases.

We welcome the Premier's response to this motion, committing to take practical action on climate change and to work with councils in reducing the State's emissions, growing a climate-ready economy, and building climate resilient communities.

Local government is uniquely placed to support the Tasmanian Government's initiatives with local offices, professionals and connections to communities across the state. Local government is the key to community preparedness and resilience against climate risks and impacts and can be a community mobiliser to lead local action to reduce carbon emissions.

To support this, LGAT has been working to support existing and activate new climate change networks, and to support the development of tools and research to assist the sector. We host the online Local Government Climate Change Group, to support collaboration and sharing information on related projects, strategies and planning across the sector. We recently undertook a Local Government Climate Change Survey to learn more about councils' achievements in addressing climate change, any further planned work and where more work could be done, either in mitigating greenhouse gas emissions or adapting to the impacts of climate change. A summary of the results can be accessed at Item 4.5 of the March General Meeting³ minutes. The survey results, combined with council feedback and our continuous policy work with councils, has helped inform our submission.

³ https://www.lgat.tas.gov.au/data/assets/pdf_file/0019/850231/12-Mar-21-General-Meeting-Agenda-and-Attachments.pdf

Discussion and Opportunities Paper

Local government welcomes the release of the Climate Change Act Discussion and Climate Action Plan Opportunities Paper to support reflection on what has been achieved and what action we can take to continue to reduce greenhouse gas emissions and adapt to a changing climate. The following section provides some key areas requiring consideration, with Attachment 1 containing additional specific comments in direct response to the questions provided.

Direction

The Discussion Paper was very broad and included areas that are elements for specific programs that may fall under the Action Plan. Many councils felt that other than providing a status report on climate science, international obligations, statutory responses and Tasmania's emissions profile, there was little specificity about a way forward for the State.

Leadership

The Australian and Tasmanian Governments have the potential for the greatest influence on climate change. Yet, they are not providing adequate resources or leadership in addressing climate change impacts. With responsibility often passed to local government and communities to find their own solution.

A number of councils are doing what they reasonably can to address climate change but need leadership from the Tasmanian Government and resourcing in order to make bigger inroads into climate change mitigation and adaptation.

Collaboration

No one entity can combat the insidious impacts of climate change. Governments, business and the community all have a stake and a role in responding to climate change impacts.

Local government is uniquely placed to support community preparedness and resilience against climate risks and impacts. Councils deliver the services and infrastructure that support and shapes the daily experiences of Tasmanians in their local areas, making them the essential partner in responding to climate change.

Adaptation

Adapting to the impacts of climate change is critical to any effective climate change response. While the Act addresses climate change adaptation through its objectives, there is no specific responsibility or targets, regulations or reporting requirements outlined. These omissions must be addressed if we are to meaningfully respond to a changing climate.

Concluding Comments

Local government supports continuing practical action over the next five years and into the future to transition to a low carbon economy. At the same time support is needed to adapt to a changing climate. Both require a clear agenda for action to help Tasmanian's address and respond to the challenges of climate change.

To be effective, the Tasmanian Government must demonstrate leadership and work alongside councils, businesses, and the community in framing responses to support climate action. It is critical that collaboration with local government is increased given their local knowledge and experience on the frontline in dealing with the impacts of climate change.

We appreciate the opportunity to provide a submission on the review of Tasmania's climate change legislation and development of Tasmania's next climate change action plan. If you have any further questions in relation to this submission, please contact Ben Morris, Policy Director, LGAT Ben.Morris@lgat.tas.gov.au

Yours sincerely



Dion Lester
Chief Executive Officer

Attachment 1

Tasmania's Climate Change Act

To what extent should climate change considerations influence policies and decisions by State government agencies and government business enterprises?

Climate change involves many dimensions and is a global problem, felt on a local scale for decades and centuries to come. We all have a role to play in reducing emissions for a safe climate and adapting to the changes it brings. Leadership from the Tasmanian Government is essential in influencing the policy process, enhancing connectivity across sectors, and the capacity of society in responding to climate change effectively.

The extent to which climate considerations influence policies and decisions should be guided by the proportional impact of those considerations on the community, including the responsibility and ability of government stakeholders to influence change. These considerations must include, but not be limited to, governance, economic development, health and wellbeing and triple bottom line risk. This must be comprehensive and strategic.

How important is it to you that the Tasmanian government systematically assess and disclose the main risks associated with projected climate change?

Very important.

Everyone needs to play their part in understanding the risks associated with projected climate change and in reducing those risks. The Tasmanian Government must lead as a trusted source of hazard information, with a duty of care and responsibility for the wellbeing of *all* Tasmanians. The hazard information provided must be localised, and regularly updated, to support councils in engaging with their communities on the impacts of climate change and in reducing associated risks.

This approach, of assessment and disclosure of impacts/risks by the Tasmanian Government, followed with community engagement by councils, provides a consistent, least cost approach, than if undertaken on a council-by-council basis.

How might the Act provide you with confidence that successive State governments will continue to act to contain/reduce Tasmania's emissions and build climate resilience?

The Act needs to provide a 'head of power' to achieve these outcomes. It needs to be specific in order to provide confidence that future governments will continue to respond, whilst also being flexible enough to be modified as needs change.

It must encapsulate a vision for a low carbon and climate resilient Tasmania that provides the community with certainty that there is an overarching, transparent and entrenched plan.

How might the Act drive further decarbonisation of the Tasmanian economy?

We propose that the Act require the Government to set science-based targets to drive decarbonisation of the Tasmanian economy, including interim targets and targets for specific sectors. Sector specific targets are best placed in Regulations to provide for flexibility.

If the Act were to espouse principles that would guide consideration of climate change by government, its agencies and business enterprises, what might they be?

The Act should build on the themes and principles of Climate Action 21 – these and other principles for consideration, include that the Government, its agencies, and business enterprises:

- Acknowledge climate change is a global issue requiring local responses;
- Acknowledge climate change action is a shared responsibility between the private sector, communities, and all levels of government;
- Advocate for and utilise the best available scientific information to guide decision-making;
- Ensure that policies and regulations incorporate climate change considerations and are consistent with other State and Australian Government approaches to climate change;
- Link with international commitments (e.g. Paris Agreement or its successor) with the aim of supporting communities, infrastructure, economies, and environments in becoming more resilient;
- Provide leadership and collaboration for action on climate change and facilitate adaptive capacity for the Tasmanian community; and
- Focus on innovation to allow for effective management and potential capitalisation from emerging opportunities.

Within the context of global agreements to action to reduce greenhouse gas emissions, what do you consider to be the main roles of the Tasmanian government and how effective do you believe the government has been?

It is the role of the Australian Government to develop appropriate, science-based targets to contribute to our climate commitments. The Tasmanian Government's role is to:

- Advocate to the Australian Government on appropriate science-based targets and programs which reflect and meaningfully contribute to global commitments; and
- Translate and contextualise global agreements and commitments to the circumstances of the Tasmanian economy, community, and local government sector by establishing and achieving targets, monitoring emissions, and disclosing climate related hazards and risks.

The global community has noted that Australia's commitments fall short of a necessary commitment. While Tasmania has reached its legislated emissions targets early, the Tasmanian Government needs to consider its unique position in supporting decarbonisation – across the State and nation, given our significant hydroelectric infrastructure and support from councils in developing a renewable hydrogen industry.

What would Tasmania be like in 10 years' time if it was a national or international leader in climate change responses?

Tasmania would be an exemplar for the decarbonisation of its economy. All stakeholders would understand climate risks, what has to be done to address these and have put in place appropriate targets and responses. This would include programs in areas such as:

- Low carbon tourism through electric vehicle, public transport, and facilities initiatives;
- Alternative energy and fuels research, with implementation programs resourced/trialled;
- Significant circular economy initiatives including resource efficiency, recycling, resource recovery and integrated waste management;
- Carbon sequestration, including research into and uptake of opportunities through ecosystem management and restoration projects;
- Planning via a statewide system that facilitates climate resilient development and progressive risk reduction in high impact localities;
- Community-based adaptation planning for vulnerable locations;
- Planned retreat or protection using a structured approach, building on lessons learnt elsewhere, local case studies and policy development;

- Health through programs that address food security, air quality, mental health, and stress-related disorders; and
- Showcasing examples of climate resilient, low-carbon development and economic initiatives.

What would you consider to be an appropriate long-term greenhouse gas emissions or emissions reduction target for Tasmania?

The Government to reduce greenhouse gas emissions and meet or exceed targets in the Paris Agreement – consistent with motion carried at LGAT’s General Meeting in July 2019. Tasmania has the opportunity through its early achievement of its legislated target to bring forward net zero emissions before 2050. Targets must align with the latest science and take into account the significant opportunities that the state has available.

What (if any) value do you think targets for specific sectors of the economy would offer, including for the sector itself? If you agree with the concept of sectoral emissions targets, which sectors should have emissions targets? Why?

Targets are important goals that can energise behaviour, support persistent and prolonged effort, and direct attention and effort towards activities that are relevant to achieving the goal. While whole-of-state targets are important, targets for specific sectors that indicate where we can effect change, and assist in tracking/monitoring progress, are more effective in driving behavior change.

The focus should be on high level sectors, such as agriculture, waste, transport, energy. Targets need to be evidence-based so fair and not disproportionate.

What key factors should influence Government decisions to set State, sectoral and/or interim targets?

A clear, evidence-based approach is needed to inform decision making about where the targets will have most impact.

The Government needs to consider impacts and/or unintended consequences where emissions abatement opportunities are limited or that require significant capital investment.

What do you consider to be the main risks and opportunities for Tasmania as it continues to transition towards a low/zero carbon economy and society? What risks and opportunities may arise if Tasmania transitions more slowly/more rapidly?

Opportunities – the costs of emissions reduction are far less than the damages of inaction, with transitioning to a low/zero carbon economy and society offering a range of co-benefits, including access to more affordable investment capital, improvements in

biodiversity and air quality, reduced energy use and costs, and related opportunities, such as for Brand Tasmania.

Some of the key innovation and development opportunities include:

- Exporting renewable energy to the National Electricity Market;
- Expanding hydrogen research and development;
- Transforming the transport sector via electric vehicles and alternative fuels; and
- Storing carbon in vegetation and soil in the agriculture and forestry sectors.

Risks – A transition to a low carbon economy will need to be carefully executed to minimise transition risks and impacts on communities and businesses. It is important to consider people’s work, stranded assets and operations, regulatory and technological changes, and stakeholder expectations.

[What do you consider to be the main roles for State government in supporting Tasmania’s low/zero carbon transition?](#)

Support – targeted funding, including incentive programs to encourage alternative energy and energy efficiency uptake. One council suggested a legislative climate change fund for holding and distributing philanthropic and government funding across financial years.

Consistent tools/processes to support councils in responding to climate change and transitioning to a low/zero carbon society are needed. More broadly, identifying and supporting people in carbon-intensive sectors to move to low-carbon sectors.

Partnerships – the government to work side-by-side with councils in addressing the challenges and opportunities posed by a changing climate, including resourced and implemented programs to facilitate community/business education and participation in emissions reduction.

Leadership – framing responses to support climate action, demonstration of what can be done (see above). For example, investment and facilitation of circular economy programs and community groups and leadership in all aspects of strategic emissions reduction and demonstration initiatives.

[What do you consider to be the main roles for State government in supporting Tasmanian communities, infrastructure, economic activities and environments in becoming more resilient to projected climate change?](#)

Significant work is occurring in building community/infrastructure resilience to natural hazards, however there is still much work to do.

More funding needs to be invested in hazard mitigation. Investment in mitigation makes financial sense as it saves significant funding in recovery. We note that the Tasmanian Government has relied heavily on Australian Government funding for mitigation activity to date.

The Tasmanian Government has developed a disaster resilience strategy, so work in the climate change should complement and add to this work.

Programs have been established in the bushfire and flood areas to build community resilience to these hazards. These programs have received national recognition and should be linked to and reviewed in the context of community climate resilience activity. There is also an opportunity to draw on the bushfire governance models used for planning and hazard mitigation for other climate hazards, such as coastal erosion and inundation.

Of particular interest to councils, were the following:

- Coastal hazards response and planning, including a review of Tasmania's State Coastal Policy and development of coastal risk and hazard policies and procedures;
- Development controls available to local government in high-risk climate impact areas such as coastal, bushfire and flood;
- Greater resourcing and facilitation for community-based adaptation planning, particularly for vulnerable coastal communities;
- Facilitation of programs to develop best practice asset management and infrastructure methodologies;
- Support to extend municipal climate profiles to all Tasmanian councils, including infographics for communicating with non-technical audiences and harmonisation of responses; and
- Technical and community-based reference and working groups for collaborating and sharing information at a Ministerial and Agency level.

Developing a New Climate Action Plan for Tasmania

Our responses below should be read in conjunction with our response to the review of the Act given the overlap in questions.

[What do you think are the key opportunities to reduce Tasmania's emissions?](#)

The following emerged as priorities in our recent Climate Change survey and in responses from councils to this consultation:

Transport

Our high level of renewable energy provides an opportunity to reduce our transport emissions through increased electrification or alternative fuels, such as hydrogen for heavy vehicles like buses. The Hydrogen Strategy and investment is a welcome step in this direction. Also welcome is the commitment of the government fleet shifting to 100 per cent electric by 2030 and the investment in charging infrastructure.

Providing a suite of incentives will support this transition. For example:

- Financial incentives to address the upfront costs of electric vehicles, or group-buying to support local government take-up to complement the State Government target;
- Providing discounts on registration for electric or alternatively-fueled vehicles, and stamp-duty;
- Advocating to the Australian Government to provide incentives such as exempting electric vehicles from fringe benefit tax (FBT) and further lifting the luxury car tax threshold for electric vehicles.

Any changes by the State Government to the road funding model should consider the impacts on the take-up of electric and alternatively-fueled vehicles.

Built Environment

For new buildings the State Government needs to advocate to the Australian Government for stronger requirements in the National Construction Code for buildings to be energy efficient.

For existing buildings market-based approaches and/or incentives to reduce emissions and costs are required. This could involve, for example, thermal improvements to current housing stock, through improved insulation and double glazing retrofit programs, or lighting and heating for commercial buildings.

Supporting a low carbon economy at the local level by facilitating opportunities. For example, by funding transition technologies and partnerships with bodies such as the Clean Energy Finance Corporation. Local government is able to demonstrate technologies to the community, but often is not able to justify the high upfront costs of these technologies.

Circular Economy

Link Climate Change Action Plan with Waste Action Plan, including how the waste levy is invested so that initiatives with multiple benefit are funded, i.e. reduced carbon emissions, reduced waste to landfill, increased local employment.

Improved Community Education and Preparedness

The State Government needs to develop education programs for the community on sustainability and climate change and providing funding for councils to engage the community. This could include climate impacts information and raising awareness of implications; explaining the benefits of addressing climate change more clearly; building resilience; coordinating forums and providing resources and tools to support low carbon approaches.

Partnership Building

The State Government needs to strengthen its partnership with local government in addressing climate change and needs to support councils to build their internal capacity. For example, through advanced risk analysis skills, community communication, development of active waste and street lighting management programs.

A facilitated summit/workshop with local government, to obtain a status snapshot and to plot a path forward in terms of emissions reduction and adaptation would be welcome.

[What do you think are the key gaps in Tasmania's current efforts to reduce emissions?](#)

Transport – high number of cars per head of population, one of the oldest fleets in Australia.

Energy efficiency – for homes, market-based approaches, and certificate schemes in other states.

Waste – a gap until recently, now being addressed via Waste Action Plan and levy, noting strategic targets for waste to landfill reduction (methane emissions).

Emissions – more broadly, including:

- Methodologies to better measure community emissions which are standardised and would facilitate improved engagement and uptake;

- Setting and identifying (visionary) state specific reduction targets, milestones and reporting mechanisms based on science that incentivise efforts to reduce emissions; and
- Utilisation and facilitation of scientific and community knowledge projects such as carbon sequestration via terrestrial and marine vegetation management.

What do you think are the main opportunities for Tasmania to transition to a low carbon economy?

Opportunities as follows and above:

- A world-leading vision for Tasmania's low carbon future to facilitate target setting, milestones, and reporting transparency;
- An emphasis on whole of community engagement and participation to ensure ownership/genuine commitment to a low carbon future;
- Low carbon agricultural innovation and incentive mechanisms;
- A willingness to engage the extensive technical and innovation expertise available across the Tasmanian community;
- Further draw upon the world class science locally available, such as Climate Futures for Tasmania;
- Research into, and uptake of, carbon sequestration opportunities in terrestrial and marine environments; and
- Transport and circular economy – on island re-processing and production.

What aspects of Tasmania's projected future climate most concern you and why?

In our survey, councils were most concerned about the immediate potential impact of bushfire, flooding and storms. Sea level rise and coastal erosion and infrastructure impacts were also rated as moderately to extremely concerning by a majority of councils. Tasmania has many coastal communities that may not have the means to retreat and protect their properties – this is a key area of work. Other areas of concern included agriculture and the potential impact of food security, drought and water security, heatwaves and other extreme weather events.

There is an opportunity to combine the existing work of the RCCI and Australian Government's Climate Compass into a refreshed program. To be successful, this needs to be backed by regional mentors and facilitators to guide councils through the risk scanning and implementation phases. In particular, focusing on the highest risk areas, for example, working with asset managers on risks and responses for infrastructure.

Which parts of Tasmania (for example locations, industries, communities) do you think are most vulnerable to a changing climate?

Local government is a key player in responding to climate change, with responsibility for a broad range of functions that are likely to be affected, such as public infrastructure, building regulation and planning, local emergency responses, public health and environmental management. Councils are on the frontline in dealing with climate change impacts and are the most accessible level of government when disaster strikes.

There are a number of challenges that local government must overcome to address a changing climate, including lack of guidance and support (including funding) from other levels of government, lack of technical expertise, limited planning and development controls, financial and legal exposure, and balancing community needs.

With each council having a unique set of geographical, environmental, economic, and social circumstances, the effects and risk of climate change will differ. However, as stated in the July 2019 LGAT General Meeting motion:

‘To a great extent, the burden of the frontline impacts of climate change fall on low-income communities, vulnerable groups and future generations’.

Tasmania’s ageing population, for example, is one increasingly vulnerable demographic.

The Coastal Adaptation Pathways program of the TCCO highlighted the above with lower income areas such as Garden Island Creek (Huon Valley) directly calling for government support to protect their community, compared with Sandy Bay, Long and Nutgrove Beaches noting they were able to move when needed and not needing government support.

Other areas of vulnerability include coastal communities and habitats, bushfire prone localities, vegetation and alpine ecological communities (as well as threatened), and agriculture and marine ecosystems, with subsequent impact on tourism, aquaculture and crops.

What do you think are the key opportunities to help Tasmania adapt to a changing climate?

The following emerged as priorities in the survey:

Coastal Hazards: A number of councils have undertaken work in responding to coastal hazards, however more work is needed, including further risk assessment and planning for coastal erosion, storms and flooding. Work with State Government was referenced in relation to coastal hazards, as was looking into compulsory acquisitions / purchasing of susceptible coastal property. Other work included stormwater management and planning

for impacts on council assets, improved coordination between state and local government coastal managers, and review of the State Coastal Policy.

Planning, Infrastructure and Assets: was a priority, including work to upgrade infrastructure, such as stormwater; set renewable energy benchmarks in all new developments; improve how the State Planning Provisions manage development and its exposure to natural hazard risk; and support for councils to integrate climate change impacts into asset management.

Suggested infrastructure and amenity projects included the revegetation of stormwater systems, tree planting programs, and ecological restoration of areas of Crown and State Growth-controlled land.

Improved community education, preparedness, marketing, and capacity building. Related, was a whole of community understanding and participation in Tasmania's low carbon and climate change adaption future and facilitation of technical and community-based working groups (see above).