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Climate Change Office  
Renewables, Climate and Future Industries Tasmania  
Department of State Growth  
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Dear Climate Change Office staff,

Cradle Coast Authority is pleased to present our written submission in response to *Tasmania's Climate Change Action Plan 2023-25* draft consultation opportunity.

We looked forward to the outcomes of this process and continuing to work with the State Government in future as we build regional resilience to climate change.

Yours sincerely,



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**Cradle Coast Authority**

## Cradle Coast Authority submission to the Draft Climate Change Action Plan 2023-25

### Summary of Recommendations

Our changing climate presents huge challenges for our region, our industries, our natural resources and our communities for this and future generations. We have a narrowing window of opportunity to get the Tasmanian community on board to rapidly reduce our emissions and put in place actions to ensure the resilience of our communities.

We encourage the Tasmanian Government to recognise the importance of effective engagement with the wider community and their need and desire for significant support in responding to the climate challenge. We recommend that the *Climate Change Action Plan 2023-25* is strengthened to better reflect the urgency of the situation and imperative for meaningful actions.

### Our Key Recommendations

#### Vision and goals

The Action Plan should:

- present goals that permanently maintain net-zero and, build on that an intention to work with national and international communities to limit global warming to no more than 1.5<sup>0</sup>C above pre-industrial levels as indicated in IPCC AR6 Reports. To help meet this imperative, the plan could strive for greater emission reduction, based on a measurable goal beyond a net-zero value.
- clearly articulate the critical need to recognise and preserve intact carbon sinks, such as native forests, blanket bogs, peatfields, wetlands, saltmarsh and seagrass meadows. The need to reduce the use of fossil fuels should also be acknowledged as a leading driver of climate change.
- include the development of a comprehensive community/industry/business participation plan to identify opportunities and actions to address emissions reduction and climate change.
- include a wider range of actions and goals that engage with a wider range of partners to provide meaningful emissions reductions and community action to abate climate change impacts.
- build on existing work and explore options for growth of key existing actions such as circular economies, carbon and environmental repair markets, significantly reducing land clearing and land conversion, development of sustainable and energy efficient housing alternatives.

- include an intention for Tasmania to actively and intelligently explore and grow opportunities for investment in carbon capture, environmental repair and emission avoidance in both land and sea contexts.
- explicitly nominate a percentage of trips under 5km that are converted from cars to active transport and a percentage of trips under 50km that are converted to public transport.

## Priority areas

### Information and knowledge

The Action Plan should:

- explicitly refer to or link with the actions and intentions of other relevant state action plans to demonstrate alignment and consistency across state-based action planning and strategy. We suggest this could be an explicit action in the development of comprehensive *Emissions Reduction Plans* at the regional level.
- ensure that the adult Tasmanian population, who are no longer in formal education systems, are aware of the imperative to respond to climate change, are empowered to do so and have access to up-to-date information and knowledge on climate science. This is a gap in the current action plan.
- provide community and regional level decision makers with timely information on the rate of change of climatic variables and the options for action to mitigate rapid change that can support effective community-based planning to improve regional and local resilience.
- provide better information for land use planners to consider climate change implications of development decisions in relation to land use conversion/urbanization, coastal and riparian processes, urban heat island effects and walkability/transport.

### Transition and innovation

The Action Plan should:

- simplify priority area naming to ensure the community better understand their intent e.g. '*Transition and innovation*' is obscure and should explicitly mention emissions reduction.
- carefully consider the scale and influence of *Emissions Reduction Plans*, and how they relate to actions and strategies adopted by other government agencies and with NRM regions, industry, education institutions and community groups.
- consider expansion of the intention regarding electric vehicles beyond government fleet vehicles to include incentives to encourage the greater uptake of electric vehicles across the community.
- include consideration of targets that lead to the ceasing of broadscale clearing of native vegetation in Tasmania and the fostering of natural regeneration in areas unsuited for development.

- be transparent and explicitly describe the drivers of climate change which need to be reduced or ceased (fossil fuel combustion and extraction, enteric methane emissions, methane emission from landfill etc.) so that the community, businesses and industry can identify the challenges and better consider solutions.
- seek to pursue initiatives to empower communities to take action to rewild/green urban areas and rehabilitate drainage lines.

### Adaptation and resilience

The Action Plan should:

- scope a *State Climate Change Risk Assessment* to include risks to social, economic, environmental and cultural assets in Tasmania, and particularly consider impacts to key natural assets such as the TWWHA and our threatened ecosystems and species.
- recognise the importance of establishing mechanisms in State Planning Provisions and local plans to facilitate the timely and least disruptive relocation of property and key economic assets threatened by coastal inundation, bushfire and flood to less vulnerable locations and provide a vision that will enable these vulnerable coastal zones to continue their contribution to our identity and quality of life.

### Implementation, reporting, and monitoring and evaluation

The Action Plan should:

- include specific, measurable, achievable, relevant and time-bound goals so the government and the community can readily determine the effectiveness of actions undertaken against the plan. CCA considers the actions within the plan are not predominantly guided by clear and measurable targets.

## Cradle Coast Authority submission to the Draft Climate Change Action Plan 2023-25

### Introduction

The Cradle Coast Authority commends the Climate Change Office for their work preparing the *draft Climate Change Action Plan 2023-25* and for inviting comment on it. We are pleased to have the opportunity to make this submission to contribute to its refinement and finalisation.

The Cradle Coast Authority's remit encompasses regional planning co-ordination, regional economic development and natural resource management (NRM) responsibilities. It is the Commonwealth endorsed NRM organisation for north-west Tasmania. It is one of 54 natural resource management (NRM) organisations in Australia and one of three in Tasmania (alongside NRM North and NRM South).

Our changing climate is already being felt in Tasmania and presents clear risks to our region through reduced rainfall, increased likelihood of dry lightning strikes and bushfire risks, increased incidence and intensity of extreme weather events and potential for flooding and increased coastal hazards. These changes impact our natural resources and the ecosystems services upon which communities and business depend. Natural resource management is at the forefront of responding to climate change, some natural resource management activities directly address these threats and others work to improve ecosystem and human community resilience and adaptability.

We note that in regard to our work across the Cradle Coast Region, it is the effectiveness of community engagement that has the greatest effect on environmental and social change. We consider this to be a fundamental cornerstone in action planning and emissions reduction planning, as outlined in the Plan.

Furthermore, land use planning and in particular the way our urban areas are planned and designed plays a central role in the causes of climate change and the responses to climate change. Our most populous settlements, economic infrastructure and many of our most valued environmental assets are to be found along our coast and rivers. These places are on the frontline of climate induced changes that threatens to disrupt many aspects of our lives. In addition, land use planning strongly influences transport, a key GHG generator, and the planning system also controls the rate and impact of urbanisation. Also of note, our towns and cities will become ever more subject to the urban heat island effect that will bring with it increased heat stress on our communities.

The required rapid transition to a low emission economy presents both opportunities and some potential threats to our region as renewable energy is expanded, carbon and biodiversity markets emerge, businesses innovate and evolve and our population and infrastructure grow.

## Plan Review

Cradle Coast Authority has reviewed the draft *Climate Change Action Plan 2023-25*. The plan is to be commended for its breadth and for addressing this important issue. However, we believe there are several ways it could be improved. These are outlined below.

We note that as an Action Plan it joins a number of other State action plans that seek to achieve a wide range of laudable aims. Other Action Plans include:

*Tasmanian Renewable Energy Action Plan*

*Tasmanian Hydrogen Action Plan*

*Disability Action Plan*

*Waste Action Plan*

*Health literacy Action Plan*

On reviewing these plans, we note that the *Climate Change Action Plan 2023-25* offers a relative paucity of specific and measurable actions. We are concerned about this and consider that the success of this Action Plan will require it identifies particular action areas and is given teeth to ensure those actions happen.

We recommend that the Plan explicitly refer to or link with the actions and intentions of these additional and relevant plans to demonstrate alignment and consistency across state-based action planning and strategy. We suggest this could be an explicit action in the development of comprehensive *Emissions Reduction Plans* at the regional level.

In relation to Natural Resource Management, we are aware that there has been rapid change globally in terms of political and community expectation for emissions reduction and that industry and government together can do more to respond to the challenge. There is growing pressure from regional communities in Tasmania for genuine emission reduction and urgency from industry to act to ensure it responds to changing markets and meets ESG (Environmental, Social and Governance) principles in operation and reporting.

We note that there has been significant change since the last Tasmanian Climate Action Plan with the latest AR6 IPCC reports was released including a change in Federal Government and numerous energy transition and policy developments. Businesses are increasingly looking to invest in carbon and biodiversity markets and NRM regions are well positioned to work with State Government to support landholders and industry in this space.

Cradle Coast Authority's *2030 NRM Strategy Cradle Coast Tasmania* firmly places climate change mitigation, adaptation and education at the fore of all of our NRM work. Specific actions have been developed in this Strategy that could be included into this Climate Change Action Plan.

For example, Priority Actions have been identified around climate resilience for biodiversity. For farm businesses, active sequestration of carbon emissions across our

landscapes, supporting landholders to engage with carbon markets and projects. For local councils, Priority Actions have been identified to better manage coastal vulnerability. We also have many other identified priorities which target specific species or landscapes which are increasingly vulnerable to changing climate.

### Vision and goals

*Do you agree with the proposed vision and goals for the action plan? Which goals are you most supportive of? Are there any other goals that should be considered?*

#### Vision:

CCA suggests the current Vision is not aspirational or inspiring and seems unlikely to engage or reassure Tasmanians. The Vision could be strengthened by being measurable.

We further observe that we know that the future will be different. It will either be diminished by the impact of climate change or changed by the imperative to respond to climate change. However, this imperative to respond to it presents great opportunities as well as great challenges. We suggest the action plan seeks to ensure the community are offered the motivation and reassurance of a better future and not just the gloom of a diminished one.

#### Goals:

We suggest that because Tasmania is already net-zero and has been for the past seven years, the Plan should present goals that permanently maintain net-zero and build on that an intention to work with national and international communities to achieve the goal of limiting global warming to no more than 1.5<sup>0</sup> C above pre-industrial levels, as indicated in IPCC AR6 Reports. This target is a globally relevant aspiration for governments across the world and Tasmania is well placed to lead in the achievement of such a target. Based on this goal the plan could strive for greater emission reduction, based on a measurable goal beyond a net-value.

CCA endorses the proposed policies, programs and commitments presented in the Action Plan on page 10, however we suggest the Action Plan could go further to achieve meaningful change in the medium to longer term.

We consider there is a need to engage widely and constructively with all sectors of the Tasmanian community to achieve action on climate change. We suggest that the Action Plan at present does not indicate a clear pathway for engaging industry, local government, regional communities or philanthropic investors in addressing climate change in Tasmania. We encourage the department to consider including the development of effective community participation plans for action on this urgent issue.

We fully support improving the management of landscapes to support emissions reduction and resilience, noting that carbon farming and precision agricultural technologies are not necessarily the most effective methods of gaining certifiable carbon drawdown, especially over the longer term.

The goals do not mention fossil fuels and the need to reduce them as a leading driver of climate change. Also, the preservation of intact carbon sinks, such as native forests, blanket bogs, peatfields, wetlands, saltmarsh and seagrass meadows. We note that Tasmania has significant potential to investigate and improve carbon storage in marine environments (blue carbon) through improved management and conservation of wetlands and saltmarsh areas.

We note that there is at present significant potential for Tasmanian businesses, farmers and regional communities to benefit from the emerging environmental repair market and carbon sequestration market. We believe this opportunity will be enabled by active participation of the Tasmanian Government in the facilitation and stabilisation of these markets in Tasmania. We are also aware that such markets can play a significant role in emissions reduction and emission avoidance at the state and national level.

We consider that the goal of increasing the use of public and active transport to be laudable but should be much more ambitious and accompanied by a specific target to reduce car usage. Action on transport is of critical importance noting that it is responsible for 18% of Australia's annual greenhouse gas pollution and transport emissions have the highest rate of growth of any sector since 1990. With no action, transport emissions are projected to continue growing to 2030<sup>1</sup>. We further note that the major source of the problem is cars, responsible for roughly half of Australia's greenhouse gas pollution from transport<sup>2</sup> and that evidence elsewhere in Australia suggests a high proportion of trips are short and therefore potentially suitable for active transport. Increasing active and public transport alone will do little for climate change unless those active and public transport trips are converted from car trips.

CCA therefore recommends:

- That the Action Plan include goals made up of a wider range of actions and goals that engage with a wider range of partners to provide meaningful emissions reductions and community action more broadly to abate climate change impacts.
- That the Action Plan include the development of comprehensive community/industry participation plans to identify opportunities to engage and actions to address emissions reduction and climate change.
- That the Action Plan build on existing work and explore options for growth of key existing actions such as circular economies, carbon and environmental repair markets, significantly reducing land clearing and land conversion, development of sustainable and energy efficient housing alternatives.
- That the Action Plan include an intention for Tasmania to actively and intelligently explore and grow opportunities for investment in carbon capture, environmental repair and emission avoidance in both land and sea contexts.

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<sup>1</sup> <https://www.climatecouncil.org.au/resources/transport-emissions-and-climate-solutions/>



- That the goals of the action plan explicitly nominate a percentage of trips under 5km that are converted from cars to active transport and a percentage of trips under 50km that are converted to public transport.

### Priority areas

*Will the three priority areas, (1) information and knowledge, (2) transition and innovation and (3) adaptation and resilience, help Tasmania achieve its legislated 2030 emissions reduction target and its vision for action on climate change? Are there other issues not covered by the three priority areas?*

We believe that the division into priority areas is a welcome recognition of the need to address the problem from multiple perspectives. These will help build the awareness essential for concerted, democratically grounded action. However, we suggest the naming of these priority areas could be simplified to ensure the community better understand their intention. We are concerned that Priority two, which is of great significance, is obscure and should explicitly mention emissions reduction.

### Information and knowledge

*Will the key actions under Priority area 1 help support decision making for you and your community or organisation? What types of projects should be supported under the final action plan?*

While CCA supports the updating of fine-scale data to help support decision making, we consider there is also a need to provide community and regional level decision makers with regular information on the rate of change of climatic variables and the options for action to mitigate rapid change. We consider the provision of both these types of information will be valuable for natural resource management and will support Local Government and landholders across our region make effective planning decision to improve their resilience.

Broader community education and engagement:

Because of the rapid developments in climate science, policy and understanding of climate risks, we suggest many Tasmanians are not aware of the urgency for action on causes, threats and solutions to climate change. The Action Plan needs to ensure that the adult Tasmanian population, who are no longer in formal education systems, have access to up-to date information on climate science. This is a gap in the current action plan.

From a land use planning perspective, the effective sharing of information and cultivation of knowledge is very important. The social licence upon which planning relies requires that the community understand and consent to the application of the planning system and restrictions on what they can develop. Ensuring we can take the community with us on this important journey will be critical and we commend all efforts to do this.

Education is also of great importance to planners and associated professionals. In order to prepare plans and consider applications for development, planners need to weigh up many different strategies and policies. Amongst the many competing

priorities it is often difficult to give enough weight to climate change considerations, given these are not always clearly or consistently articulated in policies and are rarely quantified. This puts them at a disadvantage against other factors that can be definitively, quantifiably answered and so get more attention.

The provision of better information about the climate change implications of development decisions would greatly assist in giving climate change greater weight in the planning process. In particular in relation to:

- land use conversion/urbanisation,
- coastal/riparian processes,
- urban heat island effect and the importance of urban tree canopy
- walkability/transport

We suggest the action plan identify actions that can increase this awareness and hence the weight put on these issues in the planning process.

### Transition and innovation

*Will the key actions under Priority area 2 support Tasmania to achieve its 2030 emissions reduction target and continued emissions reduction across Tasmania?  
What types of projects should be supported under the final action plan?*

CCA welcomes the intention to develop emissions reduction and resilience plans for key sectors. As an organisation focussed on Natural Resource Management, Regional Economic Development, Regional Planning and Local Government Support Services, we have a vital interest in such plans as they apply to the north west of Tasmania. We have relevant expertise and would be a willing partner in the development of such plans or in enabling regional input into such plans.

We consider it an imperative that Industry, business, local government and community are engaged to develop innovative and resilient emissions reduction actions as well as leading the formulation of ideas for resilient and liveable communities and landscapes into the future.

We recommend that the Action Plan consider carefully the scale and influence of emissions reduction plans, and how they mesh with existing actions and strategies adopted by other agencies of State and Commonwealth Government and with NRM Regions, local councils, industry, universities and community groups. CCA considers the actions within the plan are predominantly not guided by firm measurable targets. The plan should include specific, measurable, achievable, relevant and time-bound goals so the government and the community can readily determine the effectiveness of actions undertaken against the plan.

We will provide comment on specific actions presented in the Action Plan.

#### *Expansion of electric vehicle support:*

CCA encourages an expansion of the Action Plan intention regarding electric vehicles beyond government fleet vehicles to include incentives such as Stamp Duty waivers to encourage the greater uptake of electric vehicles. The Authority and our member councils are looking into opportunities to make our own activities carbon-

neutral or carbon-positive and our internal combustion engine fleet vehicles are a significant source of emissions.

*Renewable energy expansion:*

CCA looks forward to working on the Regional Stakeholder Reference Group for the north-west Renewable Energy Zones. We have significant interest in the appropriate development of new renewable energy infrastructure to ensure the resilience of our natural resources and communities with the expansion of this industry in our region.

We have existing and developing priority NRM projects which could be impacted by renewable energy development and will work with government agencies to highlight these through the Regional Stakeholder Reference Group and other engagement opportunities.

*Carbon and biodiversity markets:*

Emerging carbon and biodiversity markets have the potential to have a significant impact on natural resource management activities and LULUCF changes within our regions. NRM regions are increasingly involved in this space.

There are examples of farmers who have been assessed as successful under programs such as the state government Landcare Actions Grants Program who have opted to instead sign up to a certified carbon project. Carbon projects are being marketed readily in rural press and extension days across the state. But there is still significant confusion from landholders about the best approach to emission reduction and carbon markets.

Landholders are seeking independent advice around potential opportunities for diversification of income stream through these emerging markets. Large agricultural companies and industry bodies are increasingly looking to monitor and improve their environmental footprint and are developing environmental accounting tools to track their progress and there are opportunities that NRM regions are exploring to support this.

Farmers for Climate Action recently released *Farming Forever: a national plan for climate change and agriculture* which found that the carbon market has the potential to unlock significant on-farm, industry, environmental and social benefits and recommended an investment in NRM regions to employ a network of dedicated carbon farming extension officers. NRM Regions are also well placed to support many of the planned other recommendation in the *Farming Forever* plan around farm resilience, providing on-farm extension programs and trialling innovative practices.

*10- year Salmon Plan:*

Cradle Coast Authority provided a submission to the State Government *Draft 10-Year Salmon Plan* regarding climate risks and marine warming.

Illegal and excessive vegetation clearing:

Native vegetation provides a significant range of benefits for farm production and landscape resilience and one of the key priorities of our 2030 NRM Strategy is to encourage the protection and restoration of on-farm vegetation.

We suggest that present regulatory controls for land clearing in Tasmania should be reviewed to reduce the occurrence of land clearing activity adverse to emissions reduction targets. We note that current blanket application of exemptions may not suit the intended purpose and may be contributing to higher levels of clearing than is necessary. We encourage the Action Plan to include consideration of targets that lead to the ceasing of broadscale clearing of native vegetation in Tasmania and the fostering of natural regeneration in areas unsuited for development.

We welcome collaboration with the State Government to help bolster on-farm vegetation through investment in carrot and stick approaches to native vegetation protection.

*Non- permanent carbon sink:*

Currently Tasmania's emission profile is reliant on a non-permanent carbon sink through our forest estate, which will increasingly be impacted by external factors, such as bushfires, which are projected to increase in both frequency and intensity under a changing climate.

The Plan needs to be transparent and explicitly describe the drivers of climate change which need to be reduced or ceased (fossil fuel combustion and extraction, enteric methane emissions, methane emission from landfill etc.) so that the community, businesses and industry can identify the challenges and get on board with the solutions.

In relation to land use planning many of the actions that will benefit us in the future will need to be started now if it is to be effective at mitigating the impacts of climate change such as urban greening. As the people closest to the impacts of climate change the provision of information and resources to community groups and individuals will be essential to equip them to make the difference that needs to be made. We further note and commend the emphasis on community actions in the Plan's principles.

We suggest the Plan specifically seeks to pursue initiatives to empower communities to take action to rewild/green urban areas and rehabilitate drainage lines.

### Adaptation and resilience

*Will the key actions under Priority area 3 build resilience and support adaptation planning across Tasmania? What types of projects should be supported under the final action plan?*

CCA welcomes the intention in the Plan to complete a State-wide Climate Change Risk Assessment. We consider this assessment to be a valuable public document alongside the Tasmanian State of Environment Report and information on potential carbon and environmental markets. We encourage the Action Plan to scope such a risk assessment to include risks to social, economic, environmental and cultural

assets in Tasmania as a whole, particularly considering impacts to key natural assets such as the TWWHA and our threatened ecosystems and species.

CCA has a vital interest in such a risk assessment as it applies to the north west of Tasmania. We have relevant expertise and would be a willing partner in the development of this assessment or in enabling regional input into such an assessment.

CCA actively encourages broad support for industry, local government, community organisations and the general public to undertake adaptation planning and resilience building activities, noting that community volunteerism is a viable and effective source of labour and investment for causes such as climate change mitigation or resilience. We strongly encourage the Action Plan to include a comprehensive community participation plan for engagement of volunteers as well as industry.

It is important that all resilience planning has a major focus on communication, education and engagement around the outcomes of the planning to ensure that the relevant actions are actually imbedded into project planning, especially community infrastructure projects which are planned many years in advance and take a long time to implement.

Many elements of community resilience planning have a heavy reliance on local government to plan for and increasingly build for our changing climate. Many of our north-west councils do not have the capacity and skills to drive these actions and may be better led by the state government.

From a land use planning perspective, it is important to note that those living on coastlines and in the bush will become increasingly vulnerable to the impacts of climate change. This is likely to require responses in local plans and the State Planning Provisions to minimize risk and protect people and property. This will be very distressing and disruptive.

We suggest the Action Plan should recognise the importance of a mechanism to facilitate the timely and least disruptive relocation of property and key economic assets to less vulnerable locations and provide a vision that will enable these vulnerable coastal zones to continue their contribution to our identity and quality of life.

### **Implementation, reporting, and monitoring and evaluation**

*Are there other ways the government could make its action on climate change, and progress towards meeting its targets, more transparent and accessible?*

*Measurable actions:* Many of the actions within the plan are not guided by firm measurable targets. The plan should include specific, measurable, achievable, relevant and time-bound goals so the government and the community can readily determine the effectiveness of actions undertaken against the plan

## Conclusion

Cradle Coast Authority staff and leadership are aware and engaged in the need for urgent action to drive down our carbon emission and we are concerned that this plan could do more to adequately reflect this urgency. Our changing climate is presenting huge challenges for our region; our communities, our industries, our natural resources, our future generations.

We have a narrowing window of opportunity right now get the Tasmanian community on board to rapidly reduce our emissions and put in place actions to ensure the resilience of our communities. We ask that this plan is strengthened to ensure that that urgency is better reflected and that State Government recognises the communities need and desire for significant support in responding to this challenge.