

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

Tasmania's Draft Climate Change Action Plan is a plan for inaction. Without radical improvement, this plan will do little to reduce emissions or mitigate the impacts of climate change. The Australia Institute recommends a range of measures to strengthen the plan, including setting sector-based emissions reduction targets; accelerating the transition to an electrified transport sector; ending native forest logging; developing adaptation and management plans; expanding the protected area network; prioritising the production of the State of the Environment Report; and better demonstrating leadership on climate action.

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Introduction

The Australia Institute welcomes the opportunity to make a submission to Tasmania’s Draft Climate Change Action Plan 2023–25 (hereafter referred to as the “CCAP”).

The Synthesis Report for the Intergovernmental Panel on Climate Change (“IPCC”)’s latest Assessment Report (“AR6”) was released in March 2023, and its findings were definitive: without a deep, rapid, and sustained reduction of global emissions, global warming will likely exceed the critical threshold of 1.5°C before 2040.¹ It is critical that ambitious emissions reductions targets are adopted rapidly, across all levels of government. Restricting human-induced global warming demands global net zero emissions, which in turn requires a widespread, accelerated transition to zero-emissions technology.

To keep the goal of limiting global warming within reach, each and every nation must decrease its fossil fuel consumption dramatically. Notably, the Synthesis Report identifies the gap that exists between national commitments and material emissions reductions as a core reason for global emissions continuing to increase. Subnational governments will be required to play a critical role to ensure declared national ambitions are put into action.

Tasmania achieved and has maintained net zero emissions since 2014. This achievement has been due partly to the state’s high capacity for renewable energy production,² but the primary reason has been net negative emissions generated from the land use, land use change and forestry sectors (referred to collectively as “LULUCF”).³ When LULUCF emissions are discounted, Tasmania’s annual emissions increased 1990 and 2018, showing that it has failed to actively decarbonise other sectors of its economy.⁴

Because of this reliance on carbon sequestration from LULUCF, Tasmania’s emissions are predicted to exceed net zero by 2050 unless significant decarbonisation occurs across key emitting sectors.⁵ The state has an opportunity to substantially reduce emissions across key sectors and contribute positively to national and international emissions targets.

Tasmania’s recently reviewed *Climate Change (State Action) Amendment Act 2022* (“the Act”) and the subsequent CCAP provide an important framework for Tasmania to set and

¹ IPCC (2023) *Synthesis Report of The IPCC Sixth Assessment Report*, https://report.ipcc.ch/ar6syr/pdf/IPCC_AR6_SYR_LongerReport.pdf s4.1.

² ReCFIT (2022) *Tasmanian Greenhouse Gas Emissions Report*, Tasmanian Greenhouse Gas Emissions Report 2022, recfit.tas.gov.au.

³ Ibid.

⁴ Ibid.

⁵ Point Advisory (2021) *Tasmania: Net Zero by 2030 – Emissions Pathway Summary Report*, https://www.dpac.tas.gov.au/__data/assets/pdf_file/0029/136829/Tasmanian_Emissions_Pathway_Review_-_Summary_Report.pdf.

reach ambitious emissions reductions across key emitting sectors. The Act requires that the actions in the CCAP reduce Tasmania’s emissions, build resilience, and manage risks, and take advantage of the opportunities presented by a changing climate. Specifically, the CCAP must take into account:

- (a) the objects of [the] act;
- (b) tasmania’s emissions reduction target;
- (c) the greenhouse gas emissions for Tasmania contained in the latest greenhouse gas inventory;
- (d) the latest and best available science on the projected impacts of climate change on Tasmania;
- (e) consultation with relevant business, industry, scientific, environmental and community bodies; children and young people; local governments; relevant unions; the peak body representing trade unions; and the Tasmanian community;
- (f) evidence on the effectiveness of existing measures to reduce Tasmania’s greenhouse gas emissions and adapt to the impacts of climate change;
- (g) the findings of the most recent statewide climate change risk assessment and emissions reduction and resilience plans; and
- (h) developments in other jurisdictions.⁶

Additionally, the actions within the CCAP itself must:

- (a) reduce Tasmania’s greenhouse gas emissions;
- (b) build resilience to the impacts of a changing climate through adaptation measures; and
- (c) manage climate-related risks and take advantage of potential opportunities from a changing climate.⁷

The draft CCAP outlines seven principles—sustainable development and social equity; transparency and reporting; a science-based approach; integrated decision-making; risk management; community engagement; and complementarity—which will guide the actions of the CCAP under three priority areas: information and knowledge, transition and innovation, and adaptation and resilience.⁸

⁶ Climate Change Office (2023) *Tasmania’s Draft Climate Change Action Plan 2023-25*, https://www.stategrowth.tas.gov.au/__data/assets/pdf_file/0018/420903/Tasmania_s_Draft_Climate_Change_Action_Plan_2023-25.pdf

⁷ Climate Change (Statewide Action) Act Amended 2022, s6 5A(5).

⁸ Climate Change Office (2023) *Tasmania’s Draft Climate Change Action Plan 2023-25*, https://www.stategrowth.tas.gov.au/__data/assets/pdf_file/0018/420903/Tasmania_s_Draft_Climate_Change_Action_Plan_2023-25.pdf

While the Australia Institute broadly supports the guiding principles, these priority areas and the associated actions do not outline material actions to ensure that the requirements of the Act—specifically, that emissions must be reduced—are met.

Economy-wide emission reduction targets

The Tasmanian Government has implemented two climate change action plans since 2017, neither of which have managed to reduce the state’s emissions from sectors outside of LULUCF⁹. The current CCAP makes no commitment to sectoral or overall emissions reduction targets, explaining that “calculating emissions from projects is complex and challenging”. However, emissions accounting and targets are critical for ensuring Tasmania continues to reduce emissions.¹⁰

The *Climate Change (Statewide Action) Amendment Act 2022* stipulates that the actions in the CCAP “must reduce Tasmania’s greenhouse gas emissions”.¹¹ While the CCAP outlines several initiatives that will support lower emissions from key sectors—including funding to support electric vehicle uptake; improving recycling; replacing fossil fuel boilers; and reducing enteric emissions from livestock—it does not set an emissions reduction target. Government funding for initiatives that help industries and communities reduce emissions is welcome, but funding alone provides no guarantee that emissions will be reduced over the duration of the CCAP. A sector-based approach to emissions reductions—including quantitative targets—is essential.

Research by the Tasmanian Policy Exchange indicates that a 50% emissions reduction from 2005 levels by 2030 across transport, energy, industrial processes, and agricultural sectors is an ambitious but achievable reduction target.¹² Tasmania’s emissions profile and renewable electricity assets mean that, unlike other Australian jurisdictions that must focus on decarbonising energy generation, Tasmania can take advantage of its pre-existing clean energy production to make significant, immediate reductions in emissions in other sectors of its economy.

⁹ ReCFIT (2022) *Tasmanian Greenhouse Gas Emissions Report*, Tasmanian Greenhouse Gas Emissions Report 2022 (recfit.tas.gov.au).

¹⁰ Climate Change Office (2023) *Tasmania’s Draft Climate Change Action Plan 2023-25*, https://www.stategrowth.tas.gov.au/__data/assets/pdf_file/0018/420903/Tasmania_s_Draft_Climate_Change_Action_Plan_2023-25.pdf 27.

¹¹ Climate Change (Statewide Action) Amendment Act 2022, s6, 5A, 5(a).

¹² Tasmanian Policy Exchange (2021) *Blueprint for a Climate-Positive Tasmania*, https://www.stategrowth.tas.gov.au/__data/assets/pdf_file/0003/349239/UTAS_-_Submission_Act_and_Action_Plan.pdf.

The Australia Institute recommends that the CCAP includes a clear commitment to rapidly reducing emissions across key sectors by setting a target of a 50% reduction from 2005 levels by 2030 for all sectors, excluding LULUCF from emissions calculations.

THE TRANSPORT SECTOR

Despite a high capacity for renewable energy production, Tasmania is still highly reliant on imported fossil fuels to power the transport sector, which accounts for 21% of Tasmania's gross annual emissions.¹³

Increasing EV uptake

Increasing the uptake of electric vehicles (EVs)—through a comprehensive EV plan with fleet targets, subsidies, and infrastructure rollout—is a clear pathway to decarbonising the transport sector. It is also a strategy that enjoys the support of the Tasmanian public: the Australia Institute's Climate of the Nation Report found that Tasmanians support incentivising electric vehicle uptake.

A strong majority (74%) support the idea of a network of fast charging stations; 73% support fully electrifying the state's bus fleets by 2030; 73% support subsidising purchase costs of EVs; 72% want support for increasing domestic manufacturing of EVs and parts; and 70% support mandatory installation of fast chargers in new apartment blocks. The Tasmanian Government discounting registration and stamp duty was also a popular idea.¹⁴

The Australia Institute provides the following recommendations on transitioning to an electrified transport sector:

- Converting the government vehicle fleet to 100% EVs is an important action; however, 2025 is a more appropriate timeframe for completing this task than 2030. The plan should be extended to government enterprise fleets and should specify that the conversion will be fully electric vehicles, not petrol electric hybrid vehicles.
- Funding for the Metro electric bus trial would be better directed to purchasing electric buses for immediate implementation. Electric buses have been successfully adopted in other jurisdictions, and a trial period only delays necessary uptake.

¹³ ReCFIT (2022) *Tasmanian Greenhouse Gas Emissions Report*, Tasmanian Greenhouse Gas Emissions Report 2022 (recfit.tas.gov.au).

¹⁴ The Australia Institute (2021) *Climate of the Nation Report: Tasmanian Supplement* <https://australiainstitute.org.au/wp-content/uploads/2021/10/Climate-of-the-Nation-2021-TAS-supplement.pdf>

- In Australia, Victoria, NSW, and QLD have set a target of 50% of all light vehicle sales being electric by 2030.¹⁵ The ACT aim to get to 100% by 2030, and QLD by 2036.¹⁶ The ACT will even ban the sale of petrol and diesel vehicles from 2035. To keep pace with its national counterparts, the Tasmanian Government should set a target of 100% of all light vehicle sales being electric by 2030.
- In addition to the light vehicle target, the following targets should be set for vehicle electrification:
 - 100% of new bus purchases being electric by 2025;
 - 100% of the bus fleet being electric by 2030; and
 - 30% of new truck sales being electric by 2030.

THE LAND USE, LAND USE CHANGE AND FORESTRY (LULUCF) SECTOR

The contribution of the LULUCF sector to Tasmania's emissions profile is primarily due to a substantial decline in plantation forest harvesting, which has resulted in a 190% reduction in emissions from the sector.¹⁷ However, the scope of activities (land use, land use change and forestry) and categories (forest land, cropland, grassland, wetland, settlements, other land and harvested wood products) means that emissions reporting for this sector lacks specificity and can obscure areas of high emissions.

Ending native forest logging

In Tasmania, native forest logging is estimated to emit 4.65 million tonnes of CO₂e (carbon dioxide equivalent) annually.¹⁸ This figure is equivalent to the emissions from 1.1 million medium-sized cars, 258,000 Australian homes or 422,000 return flights to London, every year.

When calculated independently of all other aspects of the LULUCF sector, forestry is Tasmania's single highest emitting industry. Carbon sequestration through reforestation

¹⁵ Victorian Government (2021) *Victoria's zero emissions vehicle roadmap* p. 4, https://www.energy.vic.gov.au/__data/assets/pdf_file/0014/521312/Zero-Emission-Vehicle-ZEV-Roadmap-FINAL.pdf; NSW Government (2021) *NSW Electric Vehicle Strategy*, p. 20, <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Climate-change/nsw-electric-vehicle-strategy-210225.pdf>; Electric Vehicle Council (2022) *State of EVs*, p. 26, <https://electricvehiclecouncil.com.au/wp-content/uploads/2022/03/EVC-State-of-EVs-2022-1.pdf>

¹⁶ Electric Vehicle Council (2022) *State of EVs*, p. 23, <https://electricvehiclecouncil.com.au/wp-content/uploads/2022/03/EVC-State-of-EVs-2022-1.pdf>

¹⁷ Tasmanian Policy Exchange (2021) *Blueprint for a Climate Positive Tasmania*, https://www.stategrowth.tas.gov.au/__data/assets/pdf_file/0003/349239/UTAS_-_Submission_Act_and_Action_Plan.pdf.

¹⁸ Ibid.

contributes significantly to LULUCF emissions calculations, carbon released from native forest logging takes centuries to be absorbed through revegetation.¹⁹ Mature native forests can store considerable amounts of carbon both in above- and below ground biomass. In the first two years after logging, 64 per cent of carbon stored in forest biomass is released into the atmosphere. If native forest logging in Tasmania ceased, it would result in significant short-term emissions reduction from the LULUCF sector and would be equivalent to taking every single car off the road in Australia for an entire year or converting 236,000 Australian homes to 100% solar power.²⁰

The Australia Institute recommends ending native forest logging as an obvious and impactful emissions reduction measure that should be a primary aspect of Tasmania's action on climate change.

Increasing transparency

The United Nations Framework Convention on Climate Change (UNFCCC) requires parties to report human-induced greenhouse gas emissions and carbon removals from activities relating to land use, land use change and forestry.²¹ To ensure transparency, the UNFCCC recommends that emissions are listed separately from removals in LULUCF reporting. Like many other jurisdictions, Tasmania reports emissions from each category within the LULUCF sector but only to the extent of whether the category is a net emitter of carbon or a net carbon sink. For example, "forest land", which encompasses both native forest logging and the carbon dioxide sequestered from standing forests, is reported as a net carbon sink despite high levels of sequestration and emissions being generated from the activities included in the category.²²

Given Tasmania's reliance on emissions from the LULUCF sector, reporting for emissions and sequestration from the sector should be reported separately to ensure transparency and comply with the best practice standards set out by the UNFCCC. Emissions from logging native forests specifically should be reported independently. In addition to rolling out the Renewable Energy Education Package, information explaining the LULUCF sector's role should be communicated.

¹⁹ Sanger (2021), *Tasmania's Forest Carbon: From Emission Disaster to Climate Solution*, <https://static1.squarespace.com/static/60b20f09dcfc4f2bd6b0c171/t/63ddce424a52643d2f6008cf/1675480999178/Tasmanias+Forest+Carbon.pdf>.

²⁰ Ibid.

²¹ United Nations Climate Change (2023) *Land Use, Land Use Change and Forestry*, <https://unfccc.int/topics/land-use/workstreams/land-use--land-use-change-and-forestry-lulucf>.

²² Sanger (2021), *Tasmania's Forest Carbon: From Emission Disaster to Climate Solution*, <https://static1.squarespace.com/static/60b20f09dcfc4f2bd6b0c171/t/63ddce424a52643d2f6008cf/1675480999178/Tasmanias+Forest+Carbon.pdf>.

Ensuring policy integration

The Tasmanian government should ensure that its policies generally support the goal of maintaining forest coverage. For example, the Tasmanian Government's AgriVision 2050 policy²³, which maps out future growth of the agricultural sector, has the potential to conflict with the positive contribution of LULUCF to Tasmania's emissions profile to date. Agroforestry initiatives, such as the Tasmanian Government-led ActivAcre program,²⁴ should be implemented in cleared areas, and not used as a justification to convert forested areas to agricultural land.

²³Natural Resources and Environment (2020) *Competitiveness of Tasmanian agriculture for 2050*, <https://nre.tas.gov.au/Documents/Competitiveness%20of%20Tas%20Ag%20for%202050%20Discussion%20Paper.pdf>

²⁴ Private Forests Tasmania (2022) *ActivAcre carbon credit program heralds a new era in Tasmanian agroforestry*, <https://pft.tas.gov.au/news/media-release-activacre-program-heralds-a-new-era-in-tasmanian-agroforestry>

Environmental protection

The most recent IPCC Synthesis Report iterates that natural systems are some of the most vulnerable systems to climate change.²⁵ In addition, the 2024 Statewide Climate Change Risk Assessment is required by the *Climate Change (State Action) Act 2008* to consider the “environmental implications of climate change and assessment of the associated risks to... natural environments and ecosystems”.²⁶

The CCAP, however, does not introduce specific actions to address the impacts of climate change on Tasmania’s natural environment. An immediate strategy is required to address the natural environment, and as such, the Australia Institute recommends that as part of Priority Area 3 (Adaptation and Resilience), the final CCAP should include actions to build resilience and support adaptation in the natural environment, and to mitigate the current and future impacts of climate change.

LEARNING LESSONS FROM OTHER STATES

Such natural environment strategies are already in operation in several jurisdictions across Australia. Focus area 3 of South Australia’s Climate Action Plan 2021–25 is to “build the climate resilience of landscapes, habitats and resources”.²⁷ That plan recognises that “the changing climate will adversely affect vulnerable landscapes, ecosystems and the resources they provide” and that “increasing habitat resilience and strengthening conservation efforts will be critical to support healthy plants, animals and ecosystems”.²⁸

Similarly, Victoria’s Natural Environment Climate Change Adaptation Action Plan 2022–26 was developed to “establish practices, systems and knowledge to enable Victoria’s natural systems to adapt to climate impacts”.²⁹ The Victorian plan highlights the need to better understand and identify climate change impacts and adjust management approaches in response, and sets out detailed, tailored plans for key impacts such as marine ecosystem change, weeds and pests, and bushfires.

²⁵ IPCC (2023) *Synthesis Report of The Ipcc Sixth Assessment Report*, https://report.ipcc.ch/ar6syr/pdf/IPCC_AR6_SYR_LongerReport.pdf.

²⁶ *Climate Change (State Action) Amendment Act 2022* s5B, 2c.

²⁷ Government of South Australia (2021) *South Australian Government Climate Action Plan 2021-25*, <https://cdn.environment.sa.gov.au/environment/docs/climate-change-action-plan-2021-2025.pdf>

²⁸ *Ibid*, p 30

²⁹ Department of Environment, Land, Water and Planning (2022) *Natural Environment Climate Change Adaptation Action Plan 2022–2026*, https://www.environment.vic.gov.au/__data/assets/pdf_file/0030/558264/Natural-environment-Climate-Change-Adaptation-Action-Plan-2022.pdf

The following management initiatives are being implemented under South Australia’s Action Plan and/or Victoria’s Adaptation Action Plan, which could be adapted for Tasmania:

Coordination of regional and statewide landscape adaptation

South Australia’s Action Plan outlines a state landscape strategy involving government-led coordination of practical mitigation and adaptation actions across the state’s diverse environment.³⁰ At present, there is no coordination strategy outlined in Tasmania’s CCAP, and only one regional adaptation strategy for the Tasmanian Wilderness World Heritage Area.

Development of targeted management plans

Victoria’s Natural Environment Adaptation Strategy includes an assessment of key climate change related risks. It also provides a management plan for the most acute threats, which are bushfires, invasive species, and marine ecosystem change. Tasmania’s CCAP should include an action to develop management strategies for impacts to the natural environment.

Expanding protected area networks

South Australia identifies its system of protected areas—which cover 30% of the state—as critical for conserving native habitats, protecting biodiversity, and building landscape (and seascape) resilience in a changing climate. It also highlights them as an area for ongoing government investment. Tasmania’s CCAP should support the development of a similar strategy, particularly for Tasmania’s coastal waters, of which only 1.7% are highly protected.³¹ The Tasmanian Government’s moratorium on marine protected areas is incompatible with conserving biodiversity and building ecosystem resilience to mitigate climate impacts.

Developing a coastal adaptation strategy

South Australia has initiated projects to assess risks to coastal populations, restore key habitats such as seagrass meadows, and support research on protecting coastal ecosystems through the development of a long-term *Coastal Strategy for South Australia*. Tasmania’s

³⁰ Government of South Australia (2021) *South Australian Government Climate Action Plan 2021-25*, <https://cdn.environment.sa.gov.au/environment/docs/climate-change-action-plan-2021-2025.pdf>, p30.

³¹ Parks & Wildlife Service (2023) *Marine reserves*, <https://parks.tas.gov.au/explore-our-parks/marine-reserves>

State Coastal Policy 1996 is outdated and needs to be revised to account for the increasing influence of climate change. Tasmania’s southern coastal councils have initiated the Regional Councils Climate Change Adaptation Project, which provides them with an adaptation strategy to mitigate and manage the current and future effects of climate change.³² As part of Priority Area 3 – Adaptation and Resilience, the CCAP should provide for a state government coordination of adaptation strategies such as the Regional Councils Climate Change Adaptation Project.

ASSESSING RISKS TO THE NATURAL ENVIRONMENT

The Act requires the Statewide Climate Change Risk Assessment to include "consideration of economic, social and environmental implications of climate change and assessment of the associated risks to Tasmanian communities, natural environments and ecosystems and economic activity", including the "environmental implications of climate change and assessment of the associated risks to... natural environments and ecosystems".³³

In doing so, the Act requires the CCAP to take into account "the latest and best available science on the projected impacts of climate change on Tasmania".³⁴ Tasmania has not released a State of the Environment Report ("SoE Report") since 2009, despite legislative requirements to do so every five years.³⁵ An updated SoE Report is critical for assessing changes and key areas of vulnerability, and for informing management strategies in response to pressures such as climate change.

At a minimum, SoE Reports (in accordance with the *State Policies and Projects Act 1993*) must include key components addressing:

- (a) the condition of the environment; and
- (b) trends and changes in the environment; and
- (c) the achievement of resource management objectives; and
- (d) recommendations for future action to be taken in relation to the management of the environment.

However, the Australia Institute recommends that these components be expanded to ensure that Tasmania’s SoE Report is consistent with the issues addressed in the national SoE Report, which include climate, First Nations cultural heritage, heritage generally, and urban health.

³² Southern Tasmanian Councils Authority (2022) *Regional Strategy: Adapting to a changing coastline in Tasmania*, <https://www.brighton.tas.gov.au/wp-content/uploads/2022/08/Regional-Strategy-Adapting-to-a-changing-coastline-in-Tasmania-Aug-2022.pdf>

³³ Climate Change Act (Statewide Action) 2008 s6 5B.

³⁴ Ibid, 5B 2(a).

³⁵ State Policies and Projects Act 1993 s29.

Beyond the publication of the SoE Report itself, all the environmental monitoring and reporting data used or relied upon by the SoE Report should be made publicly available and easily accessible in real time (or as close to real time as possible). This data should be updated regularly and used to inform—at minimum—annual updates on the State of the Environment. These updates could then be used to inform coastal adaptation and resilience planning.

Without a properly funded, up-to-date assessment of the state of Tasmania’s environment, including the environmental changes that have occurred over the 14 years since the last SoE Report, it is difficult to see how the Statewide Climate Change Risk Assessment will be able to appraise current and future risks to the natural environment.

DEMONSTRATING LEADERSHIP ON CLIMATE ACTION

Tasmania is well placed to become a leader on climate change action. It has already achieved its legislated target of net zero emissions, or lower, by 2030. In addition, the state’s low fossil fuel use, net zero status and minimal involvement in carbon offset markets gives it the opportunity to pressure other jurisdictions to do better—and as a whole, Australia could certainly do better.

For example, the most recent IPCC Synthesis Report estimates “about 80% of coal, 50% of gas, and 30% of oil reserves cannot be burned and emitted if warming is [to be] limited to 2°C [by 2050]”³⁶. Despite this, a recent report by the Australia Institute shows that there are 116 potential fossil fuel projects in the Australian Government’s Resources and Energy Major Projects list, and estimates that these projects will generate up to 4.8 billion tonnes of emissions by 2030.³⁷

The IPCC Synthesis Report also calculates that “if the annual CO₂ emissions between 2020 [and] 2030 stayed, on average, at the same level as 2019, the resulting cumulative emissions would almost exhaust the remaining carbon budget for 1.5°C [by 2050]”.³⁸ As the third largest exporter of fossil fuels globally, Australia is not only neglecting to commit to reduce fossil fuel production, but also jeopardising global emissions reduction goals.³⁹

Tasmanians want action on climate change. The Tasmanian supplement to the Australia Institute’s 2021 *Climate of the Nation* report⁴⁰ found that just under three quarters (73%) of Tasmanians are concerned about climate change. More than two thirds (69%) of

³⁶ n 9, s 2.3.1

³⁷ Campbell, Ogge and Versteegan (2023) *New fossil fuel projects in Australia 2023*, <https://australiainstitute.org.au/report/new-fossil-fuel-projects-in-australia-2023/>

³⁸ n 9, s 3.3.1

³⁹ n 17

⁴⁰ The Australia Institute (2021) *Climate of the Nation 2021*

Tasmanians surveyed agree Australia should be a world leader in finding solutions to climate change and that state governments should act, regardless of what others are doing.

If Tasmania is committed to substantive action on climate change, it should:

- Rule out new coal mines in the state and call on other jurisdictions, including the Australian Government, to halt fossil fuel production;
- Join the ACT in the international Powering Past Coal Alliance;⁴¹
- Call for other states and the Commonwealth to end fossil fuel subsidies; and
- Call for restrictions on carbon offset use and express concern about the integrity of carbon offsets nationally and internationally.

⁴¹ <https://poweringpastcoal.org/>

Recommendations

In summary, the Australia Institute recommends that the CCAP include provisions for the following:

1. A clear commitment to rapidly reduce emissions across key sectors by setting a target of 50% reduction from 2005 levels by 2030 for all sectors, excluding LULUCF;
2. An accelerated transition to an electrified transport sector through additional policy incentives (outlined above);
3. An end to native forest logging;
4. A requirement that emissions and sequestration from the native forest sector be reported separately and independently to ensure transparency;
5. Coordinated regional and state-wide landscape adaptation;
6. The development of targeted management plans;
7. An expansion of the protected area network;
8. The development of a coastal adaptation strategy;
9. An assessment risks to the natural environment,
10. Prioritised funding in this year's budget for the SoE report;
11. Urgent completion of the SoE report; and
12. A clear demonstration of leadership on climate action by:
 - a. Ruling out new coal mines in the state and calling on other jurisdictions, including the Australian Government, to halt fossil fuel production.
 - b. Joining the ACT in the international Powering Past Coal Alliance;
 - c. Calling for other states and the Commonwealth to end fossil fuel subsidies; and
 - d. Calling for restrictions on carbon offset use and express concern about the integrity of carbon offsets nationally and internationally.