



Via Email:
climatechange@recfit.tas.gov.au

Dear Minister Jaensch

STCA RCCI COMMENTS – DRAFT CLIMATE CHANGE ACTION PLAN

The Southern Tasmanian Councils Authority's climate program, the Regional Climate Change Initiative (RCCI), is pleased to provide comments on the Tasmanian Government's draft Climate Change Action Plan 2023 – 2025 (the Plan). It also commends the Tasmanian Government on its climate program and extends its appreciation to the Climate Change Office for its briefing to the RCCI on the Plan, which has assisted in the formation of these comments. Overall, the RCCI is supportive of the Plan and its vision, goals, principles and priority areas. These are considered high-level and will progress the recent amendments to the Climate Change Act which require state-wide risk assessment and sector-based plans to achieve its legislated emissions targets and to build community resilience.

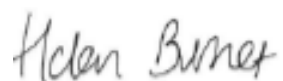
As a key tier of government and a climate stakeholder, the STCA's Regional Climate Change Initiative considers that a formalised, and appropriately funded, co-design approach that leverages the expertise and resources of the local government sector, is critical to the achievement of the Tasmanian Government's objectives and responsibilities under the Climate Change Act. A co-design approach will avoid duplication of effort and perverse maladaptation outcomes. It will ensure efficient resource use and leverage local government networks and council knowledge of communities that can amplify action.

The 12 southern councils that comprise the RCCI are well positioned to support a co-designed approach. For more than a decade, our councils have collaborated on actions to increase climate resilience and reduce emissions across our assets and services, as well supporting community efforts to do likewise. We have developed key resources, tools, and knowledge such as the: Regional Coastal Strategy, Council Carbon Calculator and Climate Risk Assessment and Adaptation Tools to support our councils in their climate responses.

In addition to a co-design, we have also compiled constructive responses to the consultation questions provided in the Table on the next page.

We look forward to further opportunities for increased climate cooperation and collaboration between all stakeholders.

Kind regards

A handwritten signature in black ink that reads "Helen Burnet". The signature is written in a cursive, slightly slanted style.

Cr Helen Burnet, Deputy Lord Mayor City of Hobart
Chair Southern Tasmanian Councils Authority

STCA RCCI comments Tasmania's Climate Change Action Plan 2023-25

Consultation Questions	Comments
1. Vision and goals	
Do you agree with the proposed vision and goals for the action plan?	<input type="checkbox"/> Overall support the RCCI is supportive, however, note that the Vision and Goals contain two distinct climate disciplines: reducing emissions and building climate resilience. Whilst they are complementary and there is cross-over they require distinct and tailored approaches emphasising differing knowledge, expertise, skills sets and resourcing.
Which goals are you most supportive of?	<input type="checkbox"/> From, a local government perspective, goals, which are supported are those that: <ul style="list-style-type: none"> ○ increase the resilience and capacity for councils to manage their responsibilities relating to the physical, financial, and transitional risks of climate change. Councils have a key role in land use planning and the provision of local assets and services that support thriving and resilient communities. Council can also assist with good climate governance, up to date information, and developing and implementing a policy framework to minimise potential liability through its decision making and provide for safe and resilient communities. ○ reduce the volume of organic waste to landfill by 50 per cent. Waste management is a key responsibility of the local government sector and is the largest component of a council's emissions footprint (up to 80% of total emissions). Whilst a 50 percent goal is supported there could be opportunities to strengthen this through partnership with the local government sector.
Are there any other goals that should be considered?	<input type="checkbox"/> Co-design with local government sector to leverage expertise and opportunities for mitigation and adaptation responses, create genuine capacity building, knowledge brokering and harmonise responses to provide local outcomes. <input type="checkbox"/> Opportunities for Households to be included as an additional sector. There is little information in the plan as to what households can do to lower their emissions. For example, many households in the Tasman municipality use gas for hot water / cooking and wood fire for space heating. Initiatives such as 'electrify everything' led by the Tasmanian Government in partnership with the local government sector could encourage the consideration of alternatives for new builds and when replacing appliances where appropriate.
2. Priority areas	
Will the three priority areas: (1) information and knowledge; (2) transition and innovation; and (3) adaptation and resilience;	<input type="checkbox"/> It is considered that the Priority areas will progress the Tasmanian Government towards its legislated target, Vision and Goals. Importantly they will provide a credible basis to inform the Climate Change Action Plan 2025 – 2030 of the actions and program necessary to achieve the targets and provide the policy framework and evidence bases to inform sectors, including local government on climate action.

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

Whilst wastewater is mentioned in the Plan there is no discussion of how methane emissions from the sector will be addressed. Many Tasmanian households are connected to their own septic system presumably resulting in high per capita methane emissions. Options such as Aerated Wastewater Treatment Systems may be better alternatives, however uptake is low due to the higher initial cost and there is little information available on their emissions. If the introduction of reticulated sewerage with methane capture is not suitable or available, information to allow households and businesses to choose better on-site sewage treatment options would be helpful and may encourage change to lower carbon options.

3. Information and knowledge – Priority Area 1

Will the key actions under Priority area 1 help support decision making for you and your community or organisation?

- From a local government decision making perspective updating fine scale projection is critical to support good decision making across its role and responsibilities
- The development of a suite of resources for user needs is highly supported – local government is a key stakeholder and keen to co-design. Households should also be considered as a stakeholder. Resources for local government and households would improve capacity to develop and implement local climate solutions and outcomes.
- The Government decision making framework could be broadened to include local government – this would allow for greater vertical and horizontal integration of responses, as well as avoid duplication of effort and increase resource efficiency.
- Schools/Dept Ed – schools are located within almost all local government municipalities and local government should be considered a key stakeholder – both sectors have strong trust and complementary reach/networks into their communities that could leverage enhanced climate leadership and embed learnings.
- Support on going climate research grants program – this should include a stream that facilitates local government and climate research connections and placements, such as Council’s Asset Management and Masters Engineering, or Council’s Development Planning and Masters Urban Planning
- Community event(s) rather than an awards program would encourage a collegial response and result in a greater sharing of climate responses.
- Tasmanian Climate Dashboard – the LIST is very clunky and difficult to navigate – needs to be something simpler where communities can understand climate impacts in isolation or from an integrated perspective.

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

4. Transition and innovation – Priority Area 2

Will the key actions under Priority area 2 support Tasmania to achieve its 2030

- Overall it is considered that the Priority Area 2 Key Action’s will make a meaningful contribution to the emissions target, and will drive on-going action.

emissions reduction target and continued emissions reduction across Tasmania?

It is considered that local government is a key stakeholder in the sectors that the Emission Reduction and Resilience Plans are being developed. For example, local government is responsible for a significant amount of the road network that requires EV planning, and has fleets, heavy and light, that need to transition to EV, that could be included in the Transport ERRP. Similarly it is responsible for landfills and waste management within its municipalities that would be included in the Waste ERRP.

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

- Support innovation in the reduction of organic waste to landfill. Developing markets for recycled and composted material. Projects that support reduction of waste to landfill are key in reducing emissions and engaging the community in climate action.
- Support and collaboration with the local government sector to decarbonise its heavy fleet – this could be achieved through pilot programs with councils.

5. Adaptation and resilience – Priority Area 3

Will the key actions under Priority area 3 build resilience and support adaptation planning across Tasmania

In relation to the critical area of biodiversity and landscape management, the Plan focuses on bushfire risk in the TWWHA which is an important, however small component of the Tasmanian Government's 2.86 million hectares of reserved land. The vulnerability of Tasmania's reserve estate is documented in various publications (although the focus has been on the TWWHA); and as such the Plan's key actions for this priority area should include actions to increase the resilience of species and ecological systems.

The Plan's key action 'guidance to manage coastal hazards' is supported and a critical issue for many of Tasmania's Council's. Work previously undertaken in this space and this works needs to continue and be enhanced. The STCA RCCI Regional Coastal Strategy provides a strong policy framework and guidance for councils, however resources are required to support the development of coastal plans to address increased hazards of sea level rise, inundation and erosion that threatens coastal communities.

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

- Adaptation actions that increase the resilience of biodiversity and ecosystem services to climate change include responses like minimising additional stresses or disturbances, reducing fragmentation, increasing natural habitat extent, connectivity and heterogeneity, and protecting small-scale refugia where microclimate conditions can allow species to persist (high confidence) (IPCC AR6 2023).
- The Plan refers to adaptation and resilience through the lens of support for planning and decision making and building resilience to natural disasters. The critical piece that is largely missing is adaptation actions as outlined above in the IPCC AR6 report that support biodiversity and ecosystems. Species and systems are highly vulnerable to changes in temperature and weather patterns. Building resilience is critical and needs to be supported at a State level through policy, legislation and incentives.

6. 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

The provision of information – carbon and energy footprints, and climate projections/profiles at municipal and regional scales. The current modelling could be augmented to enable greater access and insights across communities and councils enabling the targeting of specific actions to mitigate emissions and manage climate risk, rather than generic and populist action that may result in duplication or misplaced effort and resources.