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Climate Change Office
Renewables, Climate and Future Industries Tasmania
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Submission - *Tasmania's Climate Change Draft Plan 2023-25*

From the Tasmanian Independent Science Council: <http://tassciencecouncil.org>

Composed of scientists and other professionals, the Tasmanian Independent Science Council (TISC) is dedicated to science-based policy reform to ensure the long-term health of Tasmania's environment. We welcome this opportunity to make a submission to strengthen Tasmania's plans to address climate change.

We believe the government's draft Climate Change Action Plan (CCAP) should leverage effective and timely action under the 2022-amended Climate Change (State Action) Act. However, because that legislation is limited in some material ways, as outlined in the Climate Tasmania/TISC's and other groups' earlier submissions when the recent legislative amendments were being drafted, any CCAP to give effect to the legislation itself may be limited.

Overall, the TISC finds that CCAP contains a number of useful actions and goals but remains well short of the level of ambition, clarity and focus needed. Although we support much of the intent of the plan's makers, many of the proposed formulated actions lack enough detail and quantitative parameters to give assurance that the CCAP will be effective and useful for steering and implementing Tasmania's climate actions. For instance, the comment about "strong policy framework to consider climate change risks" (page 10) is nebulous. Likewise, the climate adaptation and resilience questions identified in the CCAP are missing acknowledgement of some of the major risks that must be tackled.

We believe climate mitigation and adaptation issues are both vitally important to Tasmania's future, though because of the urgency of escalating emissions and risk of crossing critical

climate thresholds, the TISC's following comments focus on revising the CCAP to better address climate mitigation measures:

- Firstly, we strongly advocate adopting a target for actual reduction of emissions, independent of reliance on carbon sequestration from land use, land-use change and forestry (LULUCF) to meet climate mitigation goals. Given that the legislated emission target is only net-zero by 2030, which Tasmania has already achieved, it is timely and essential to pursue a more ambitious goal. A target of reducing absolute emissions by 60 percent by 2030 is necessary for Tasmania, with specific steps towards this goal detailed in the climate action plans for specific sectors. The need for such a target is all the more pressing given that since 2007 the Tasmanian government has had climate change action plans but without achieving any reduction in the State's emissions (as distinct from offsetting emissions via sequestration from forest regrowth, which is too uncertain, variable and impermanent).
- Development of comprehensive sector plans to support the CCAP is crucial. And these sector plans must contain planned emission reductions (ie, targets) which are subject to regular monitoring to ensure the mitigation actions are effective and that the public can confidently assess the effectiveness or otherwise of the actions.
- It is problematic to identify biofuels as an emissions reduction measure in the LULUCF sector. Scientific research suggests that use of forest biomass energy has problems, and it risks undermining the carbon sequestration potential of Tasmania's native forests.
- Action on climate change must be coordinated with efforts in other areas of environmental policy, in particular concerning the conservation and restoration of biological diversity (e.g. managing bushfire risks, reforestation of degraded landscapes) and ensuring green energy projects (e.g. wind farms and hydropower dams) are not undertaken where they could damage biological diversity or geodiversity values. Tasmania must recognise its special legal responsibilities to its World Heritage areas, which occupy 25% of the state's landmass, for protection from climate impacts, especially bushfires.
- It's important that the Tasmanian government demonstrate leadership on climate action by reducing its own carbon footprint as quickly as possible. Some aspects of the CCAP

suggest that goal lacks ambitiousness; for instance, the target to make the government vehicle fleet 100% electric by 2030 is too slow.

- Likewise, the business sector needs to be at the forefront of change. The CCAP identifies only one incentive or target for the private sector to reduce its emissions (the aluminium plant). The CCAP should elaborate, such as through its sectorial plans, on other incentives and targets for action by companies, with emissions to be achieved through real reductions rather than reliance on offsetting through acquisition of carbon credits.
- For the community / household sector, greater emission reductions will come primarily via switching to electric vehicles and improved energy efficiency and use of renewables in homes. The CCAP lacks incentives to leverage urgent action by Tasmanian households. Provision of financial subsidies for electric vehicles and recharging infrastructure would be helpful, along with overcoming barriers to access batteries. Improved public transport is welcomed as part of the action plan for this sector, but transport must be embedded in land use planning schemes that restrict urban sprawl and make greater use of the existing urban footprint of Tasmania's towns and cities. This needs to be complemented by comprehensive policies for enhancing the use of buses and for active transport including bicycles and pedestrian access.
- Banning or removing more plastic from households' and businesses' waste streams is also vital, building on recent efforts by some local authorities and corporate actors to ban plastic bags and other single-use plastics.
- The expansion of agro-forestry is welcomed, but action in the forestry sector needs to quarantine native forests through a ban on logging native forests, as has been decided by the governments in Western Australia and Victoria.

Lastly, to ensure governance integrity in the development and implementation of the CCAP and collateral policy instruments, the TISC wishes to highlight several important issues.

- We welcome the government's plans to establish a Climate Change Reference Group to provide ongoing advice on climate action, but the membership of the Group must be representative of Tasmanian stakeholders including youth and environmental groups rather than be dominated by (for instance) business groups.

- Concomitantly, there must be full public disclosure of Tasmanian climate emissions, including within specific sectors, so there can be accountability and public confidence. For instance, LULUCF emissions from native forest logging should be reported separately from the sequestration of Tasmania's forests. Public information is vital to enable independent and rigorous assessment of the effectiveness of climate actions.
- Lastly, an effective climate action plan must be financed adequately. The proposed \$10 million funding to implement the CCAP seems far too small, and there is lack of detail as to the costing of this figure.

In conclusion, the TISC welcomes Tasmania's efforts to put legislative aspirations into concrete action plans on climate change but hopes the draft CCAP can be revised to achieve more ambitious and comprehensive outcomes over 2023-25. We also recommend that the Tasmanian government work more closely with other Australian governments to ensure Tasmanian actions are coordinated with and improved as other governments lift their game.

Submitted by Professor Benjamin J. Richardson, Dr Jennifer Sanger and Emeritus Professor John Church, on behalf of the Tasmanian Independent Science Council