Submission to the Tasmanian Draft Climate Change Action Plan 2023-2025

Vision

The Vision is lacking in ambition. The current level of global emissions has led to a 1°C rise in average atmospheric temperatures. Maintaining and holding net zero emissions is an inadequate response. There has to be drawdown in order to achieve at atmospheric concentration of greenhouse gases compatible with sustaining life on earth long-term. We should set a target of reducing our current emissions by 50% by 2030. In Tasmania, this is readily achievable and would set a fabulous example to the mainland and the rest of the world.

This document does not read to me like a plan, but rather a strategy. It has broad-brush statements, but no concrete targets, nor costed and proven pathways to achieving those goals. In a plan, I expect to see specific actions, a timeline and budget. This 'plan' is almost a way of avoiding full-scale action for a further two years, perhaps until the next state election. Words such as 'increasing', 'reducing' and 'improving' are not goals – they are just the principles against which specific goals could be set. Even the two goals which have figures, eg: 'a 100% electric vehicle government fleet' are very modest. Where is the goal for electrification of Tasmania's entire vehicle fleet?

With respect to: 'reducing the volume of organic waste sent to landfill by 50%' by 2030, this sounds much better than the reality, since NRE's own 2020 report entitled *Tasmanian Organic Research Report* shows that 77% of all core organic waste, is already being diverted away from landfill. A 70% reduction in the remaining 23%, would be a more ambitious and meaningful target.

Priority Areas

Information and knowledge

The priority area 'information and knowledge' should not have equal weighting to the others, since we know what must be done. The only benefit of further data and analysis, is to understand where are the biggest opportunities for emissions reductions. For instance, it is possible now to create digital twins of cities (Hobart and Launceston would be ideal) and use microelectronics to monitor urban hotspots, high pollution levels from areas or specific emitters, the effect of mitigation efforts (eg the shading effect of urban trees), the resilience of infrastructure adaptations and so on.

I question our carbon accounting methodologies, and am uncertain that Tasmania is in fact at net zero emissions. For instance, we learnt recently that owing to our connection to the mainland electricity grid, we actually import around 17% of our electricity, much of which is generated from coal-fired power stations.

Additionally, the carbon accounting of our land use sector seems woefully inadequate. Science has moved on and proved that mixed age native forests continue to sequester large volumes of carbon (rather than slowing down as was previously assumed) each year, whereas we've tended to assume that same-age young trees sequester more owing to them being fast-growing. In fact, the volume increase in a mixed-age forest containing large trees, an intact understorey and healthy soil, is massive compared to that of a young forest. Therefore, we are insufficently accounting for the loss of carbon when a mixed-age native forest is clearfelled.

Likewise, since such a large percentage of Tasmania's forest estate goes for short-term products, the carbon is not sequestered over the long term. Approximately half of a clearfelled native forest coupe is left on the ground as waste, much of which will immediately yield its carbon to the air when burnt. Of the timber harvested, approximately 95% by volume goes to pulp or other short-term products, which will release their carbon over 2-3 decades. Only around 5% is suitable for good quality sawlogs. Sadly, the figures are not that much better for hardwood plantations, which are mostly fast-growing *e.nitens*, a species not well-suited to sawlogs or appearance-grade timber uses. Even the softwood plantations fail to yield a large percentage of sawlogs at present. These figures are readily available through analysis of the *Australian Forest and Wood Products Statistics* dashboard on the DAFF website.

This means that our timber industry is always operating on a carbon deficit and it is ingenuous to claim that it is a net zero industry. Every time a mature forest is felled and replaced, it takes many decades for that regrowth forest to sequester the same amount of carbon lost through harvesting operations, fire and short-term product degradation. As we gradually replace our production forest with regrowth we are both reducing its annual carbon sequestration capacity, and reducing its resilence to the effects of climate change.

Transition and innovation

- Reduce methane emissions through the capturing of fugitive emissions from agriculture, mining and other sectors. Methane (while more short-lived than carbon dioxide) is a far more powerful greenhouse gas. Action is needed to:
    - Make available to all cattle farmers (at an affordable price), the current enzymes available for reducing methane production, while the asparogopsis production ramps up (currently a long way short of being able to supply all Tasmania's herd).
    - Provide grants to councils for the capture of methane from landfill sites and the closed-container style of composting. Incentivise councils to undertake FOGO kerbside collection and publicise the improved economics vs BAU of so-doing.
- Cease the logging of native forests. This is a quick and easy win. The products and jobs dependent on that industry can be simply transitioned to Tasmanian-based processing plants that create laminated, compressed and other engineered structural wood products with long lifetimes.
- Pay farmers to sequester carbon in soil, reduce reliance on artificial fertilisers (one of the most energy-intensive processes in the world is used to produce nitrogen-based fertiliser), plant trees, improve biodiversity and diversify operations.
- Modernise and electrify our public transport system on a regional basis. 25-30% of Tasmania's greenhouse gas emissions are attributable to transport. Yet, Tasmania spends $$bns each year on building or extending road infrastructure aimed at the private car, strategies that have proven to be ineffective at reducing congestion, and which perpetuate the social inequality of mobility in the state.
    - Mobility as a service (MAAS) is a concept oft described in documents issued by Infrastructure Tasmania, yet we see no action to implement such a system. Tasmania would be ideal for a integrated transport system, that incorporates different public transport modes, a reliable route-planner and a ticketing system that straddles all modes.

    - Base rego rates on GHG emissions such that EVs are incentivised vs large utes and SUVs.
    - Lobby federal govt to bring vehicle emissions standards into line with European countries.
    - Lobby federal govt to remove tax incentives for 1tonne capacity utes.

- There is much talk in the plan about helping industry with energy efficiency, emissions reduction and resilience, but nothing about the residential sector. Our housing estate is extremely inefficient owing primarily to historically low or missing insulation standards, no standards on passive heating/ cooling technologies (or simple building orientation), a reliance (especially in rural areas) on inefficient wood-fired heating, and a prevalence of concreted surfaces and dark roofs, over more climate-conscience design.
    - Older houses need urgent retrofits to achieve greater energy efficiency, including higher levels of insulation (eg double-glazing), installation of heat pumps, and replacement of gas appliances with electric.
- Decouple Tasmania from the National Energy Market and remove support for Marinus. A doubling of renewable energy capacity plus the creation of a further link over the Bass Strait, will create highly significant volumes of GHD emissions from the manufacturing and construction sectors. Energy produced at such a distance from its intended market is highly inefficient given the attenuation resulting from distance. It also builds in a lack of resilience to global shocks or localised emergencies. The mainland is far better placed to generate its own renewable energy close to where the power will be used.
- Phase out energy rebates for large industrial users. Large users currently have no incentive to reduce their energy usage (or GHG emissions).
- Lobby federal government to introduce 'right to repair' legislation, encourage manufacturers to stop the practice of built-in obsolescence, introduce a nationwide container deposit scheme and renegotiate international trade treaties that enable foreign entities to dispute new environmental laws that could disadvantage their Australian market share or profit levels.

Adaptation and resilience

- While the new draft Tasmanian Planning Policies talk about future-proofing, there are no new building standards or codes which enshrine such principles. Plannning authorities are being forced to pass new subdivisions and multi-unit developments which are not fit for purpose and will lead to urban hotspots, high energy costs for homeowners and stormwater problems/ inundation. Govt needs to urgently update building codes and regulations.
- A decentralised energy sector that encourages cell-like community power generation creates long-term resilience and greater probability of business continuity in the event of major weather events.
- Encourage urban mitigation measures including green walls, street trees, permeable ground surfaces (in preference to concrete), rainwater tanks, community batteries etc.
- Assist local councils to upgrade infrastructure, especially revetment walls, stormwater networks and unsealed road durability.
- Encourage councils and other institutions to move investments out of fossil fuels.

- Lobby federal govt to legislate to require banks to stop financing new fossil fuel exploration, production and extensions.
- Train more professional fire-fighters to work alongside volunteers.
- Allow councils to review dormant DAs and introduce new climate-friendly conditions, despite substantial commencement.
- Begin adopting new economic measures based on the state of the environment and social equity, rather than the old-fashioned dependence on GDP. If climate-friendly environmental targets were given as much weight as production goals, it would promote behaviour change and protection and development of more resilient ecosystems and societies. We need to move from the old 'growth' mantra to one of stabilisation or degrowth, to reduce our planetary boundaries overshoot.

Implementation, reporting and monitoring and evaluation

- Address the inaccuracies inherent in current carbon-accounting methodologies.
- Close to real-time updating of sector emissions via online dashboard – promote emission reduction competition between sectors and regions, through incentivisation and celebration of successes.
- Undertake before and after pilots on different mitigation methods such as new building/ planning innovations, street tree planting etc, and make the data and reports accessible to the public.

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