

Dear Climate Change Office

Thank you for the opportunity to comment on Tasmania's evolving Climate Action Plan (Plan) and we commend the government in working in such a transparent manner through extensive public consultations especially in recent years.

Continued net negative emissions is critically important to delivering on Australia's emissions reduction targets, however, as the Plan points out in Priority 3, adaptation & resilience remains Tasmania's priority focus going forward; indeed a recent study by [Deloitte Access Economics \(2022\)](#) found that without action Australia's economy could suffer \$174 billion in costs over the next decade and this will likely affect smaller volatile and highly trade-exposed economies like Tasmania

And while appropriate adaptive responses remain very locationally specific, Tasmania's unique ecosystems remain highly vulnerable and exposed to current & future climate impacts (drought, bushfire, marine heatwaves and damaging storms causing coastal erosion) including marine species that regularly traverse its waters & coastlines.

This Plan provides an opportunity for Tasmania to enhance ecosystems resilience to climate impacts; Engineers Australia (EA) is also pleased to see the Plan supporting adaptation efforts in vulnerable communities as well as for industry

While the draft Plan includes 7 very relevant high-level principles, which EA supports (page 11), EA considers the final Plan might define each in more detail to ensure a common understanding for and an enduring consistency across all stakeholders going forward; EA also suggests the principles could be strengthened by including 'equity' as well as a deeper emphasis of inclusion for indigenous cultures and practices which are highly relevant to not only 'place-based' stakeholder consultations but Tasmania's adaptation efforts too (as an example, WA Govt recently released a suite of [adaptation principles](#), which complement strongly Tasmania's principles but includes additional principles & explanations)

Unlike mitigation, where in large part the information on least-cost options to reduce emissions tends to rest in the domain of the private sector, many adaptation-led investments are heavily reliant on publicly generated and sourced information where decision-makers; be they Tasmania's 17 local councils, private sector, state or federal government owned assets tend to require access to locally tailored, relevant and contemporary information and data for scenario analysis to inform long term planning and investment decisions

Similarly, unlike mitigation (tCO₂-e reduced/avoided) there is no single quantitative measurement for effective climate adaptation & resilience; EA is pleased the Plan focuses on information and data needs, however there also needs to be appropriately sufficient policy incentives &/or compulsions (say via regulations and standards etc) to make what may already be technically feasible adaptations also economically viable; EA believes that these settings are yet to adequately exist anywhere in Australia's policy landscape let alone in Tasmania

Tasmania's exports and imports have a high dependency & are subject to competitive pressures from the Australian mainland, & so what happens in the rest of Australia in regard to mitigation, adaptation and resilience policy settings matters.

For example, incentives in blue carbon could offer Tasmania a globally competitive advantage in the domestic (& ideally if allowed by the Commonwealth) international offsets markets via regeneration and expansion of marine algae (including for bio-energy) and CO₂ sequestration opportunities in mangroves, saltmarshes and seagrasses

From an engineering perspective, adaptation fundamentally requires the adoption of best practice standards and professional practices on a life cycle basis (scope 1, 2 and 3 emissions and from design, construction, maintenance to decommissioning), as well as across a whole of life supply chain basis (upstream, midstream and downstream); perhaps the Plan could propose exploring and identifying what these are for Tasmania's circumstances and where they might be best harmonised on a national basis

Clearly the Govt needs to build complementary capacity within its public service; and it can do this by adopting these 'best practices' & standards into existing and future policies, programs and procurement decisions; this means public finance decisions recognising value for public monies more in terms of enhanced adaptive resilience of public infrastructures in a rapidly changing climate rather than simply lowest cost which could embed a high degree of future climate vulnerability; for example the Global Commission on Adaptation (2020) calculates that for every dollar spent on adaptation is positively leveraged by up to 10 times

Finally, EA commends the Govt's goal of a strong policy framework that considers internalising climate risks on a "whole-of-government" basis and keeping track of this Plan's progress; as such it suggests it might be beneficial for officials to collaborate closely with other like-minded states in the development of a National Climate Risk Framework in support of consistently and comparable monitoring, assessing, and reporting approaches on the implications of climate especially across of the States & Territories finances, infrastructure, physical, natural and cultural heritage assets and service delivery

EA remains at the service of the Tasmanian Government to engage in future consultations and to advise on the engineering elements of its Plan going forward and it looks forward to the release of the final Plan in mid-2023 and supports the Plan being updated in 2025.

Kind regards

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