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Draft Tasmania's Climate Change Action Plan 2023-25

The Draft Tasmania's Climate Change Action Plan 2023-25 (TCCAP) continues the Liberal State Government's strategy of seeking to avoid responsibility for reducing carbon emission. Carbon emissions reduction should be the focus of the TCCAP and will be the focus of the TCT's submission.

Limitations of the Climate Change (State Action) Amendment Act

Please note the attached article published in the Mercury newspaper that addresses the TCT's concerns regarding the failure of the State Government to identify carbon emission reduction targets in the *Climate Change (State Action) Amendment Act* and the limitations of the 'net zero emissions' target.

A lot of padding

The TCCAP has a lot of padding that seems to be intended to distract the reader from the lack of relevant content e.g. goals and actions that the government is committed to.

- The plan starts on page 10, 13 pages into the document.
- Out of 8 pages (pages 16-23) that are purported to be addressing carbon emissions reductions, only one page is doing so (see detailed comments below).
- The section 'What have we done?' (pages 8-9), largely duplicates the information in Priority Area Two 'How are we reducing emissions from our key sectors?' (pages 19-21). The TCCAP is meant to be a plan for future climate

action and it is not made clear why this information is provided. This background would have been appropriate in a discussion paper.

- The section 'How will the target of net zero emissions, or lower, from 2030 impact our economy?' (page 28) is another example of information better presented in a discussion paper rather than a draft plan. It is not at all clear that the information relates to the goals and priority areas?
- The section 'Alignment to other government priorities' (page 29) is so brief that it is hard to see how meaningful comments could be made. This seems to be promotion of the state government's work in related areas with no apparent relevance to the TCCAP.
- The section 'Defining Tasmania's key sectors' (pages 30-32) seems to be either entirely irrelevant (as it relates to the yet to be developed ERRPs) or it does in three pages what should be done in three paragraphs.

Only one page in the TCCAP is dedicated to carbon emissions reduction

The TCCAP identifies three priority areas, none of which directly or explicitly refers to reducing carbon emissions. The Priority Area 2 'Transition and innovation' purports to address carbon emissions reduction.

The TCCAP is 37 pages in length but carbon emissions reduction are only purported to be addressed by the Priority Area 2 which fills 8 pages, pages 16-23. As elaborated below the following pages do not relate to carbon emissions:

- Page 16: an introduction that seems to repeat information contained in other sections ('Minister's forward' and 'developing Tasmania's next climate change action plan') and a case study of the Business Resource and Efficiency Program;
- Page 17: Three sentences addressing 'Current emissions from our key sectors' and a graph depicting carbon emissions or sequestration for five major sectors (noting that the time period and the geographic area that the graph relates to is not stated);
- pages 19-21: 'How are we reducing emissions from our key sectors?' (see comments below);
- pages 22-23: 'Tasmanian Emissions Pathway Review "best-fit" opportunities for Tasmania' (see comments below).

This leaves just a single page of the TCCAP that relates to carbon emissions reductions.

The 'Priority Area 2 Transition and innovation', page 18, includes just two actions on carbon emissions reduction. The first action relates to the Emissions Reduction and Resilience Plans (ERRP) for key sectors, which are to be developed through a different process. Therefore, the TCCAP includes just one single action.

Responses to the sole action contained in the TCCAP: 'Supporting business, industry, the community and government'

The TCCAP has just one action regarding reducing carbon emissions:

Supporting business, industry, the community and government to innovate and implement emissions reduction opportunities, now and into the future.

Including only one action is an insult to the intelligence of the Tasmanian community.

Does the state government expect that with the huge resources within the Department of State Growth that the community is meant to produce the detailed actions to address carbon emission?

As with most similar strategies and plans the wording of this action is not really action orientated – committing only to unspecified 'support'. It is unstated but it seems that the support is to be provided by the state government. But regardless of who is providing the support the action plan does not commit to any specific support to be given to business, industry, the community and government. A list of eight general project types is included that 'may' be actioned. This means that the supposed action plan does not, in any honest sense, provide a single action.

This supposed action does not (as stated on page 2 of the plan) 'provide a clear pathway to achieve our legislated emissions reductions target'. Critically, they do not relate to the goals listed on page 10.

Priority Area 2 – parts that do not relate to carbon emissions reduction

'Business Resource and Efficiency Program'

The case study on page 16 makes no mention of any carbon emissions reductions that were intended or achieved through this program. There are repeated references improved efficiency but this in no way can be equated with carbon emissions reduction. There seems to be no reason for this section to be included.

'Current emissions from our key sectors'

This section, on page 17, properly fits in the introduction as it relates to current emissions and not actions to reduce emissions.

'How are we reducing emissions from our key sectors?'

The supposed carbon emissions reduction actions are followed by three pages (pages 19-21) that list 'How are we reducing emissions from our key sectors?'. There is a lot of specific 'measures' listed but the plan does not commit to these continuing (where they may be ongoing) or restarting/refunding them where they have concluded.

This is just dishonest and an apparent attempt to distract the reader from what the plan should be doing, i.e. 'proposing actions for the future'.

It is not clear if the state government expects a response to these 'Emissions reduction measures' but if they do, there is insufficient information provided to

make informed comment and many are worded too passively so it is unclear what action is expected.

Given that the plan fails to request comments on these specific measures I will not endeavor to comment on all of them.

- The 'Emissions reduction measures' includes just two IPPU actions, one that relates to a small amount of funding for all large emitters to reduce their emissions (with no specifics as to what was intended or achieved) and a vague statement that the government is continuing to work with Rio Tinto to support decarbonization of its smelters (again with no indication of what was intended and what actually was achieved).
- If I was to support a particular action, I cannot determine from the plan whether the funding provided is sufficient for the action to be achieved and, if not, what would be required.
- With the Metro bus trial there is no explanation of whether this has occurred and what has resulted. How can we support an action in the absence of this information?
- With the program to electrify the state government vehicle fleet, key issues remain unaddressed e.g. what parts of the state government are included and excluded and what progress has been made to date with what amount of funding? With-out such information we cannot determine if it is worthy of support or not and, if it is, what we may recommend that might improve it.
- The state government has been 'Chairing Tasmania's Electric Vehicle Working Group since 2017' but there is no information provided to show that this has delivered anything.
- Some statistics are provided on the growth of electric vehicles in Tasmania, with the implication that the state government's stamp duty waiver has contributed to this. But there is no relevant measure provided e.g. has this lead to a reduction in carbon emissions? While the number of electric vehicles has grown from 800 in late 2021 to just over 1 600 vehicles at the end of January 2023, did this result in a reduction of emissions by the vehicle owners or did they still drive a petrol vehicles just as much? Did the number of petrol and diesel vehicles in the state increase by the same or higher number as the EVs?

'Tasmanian Emissions Pathway Review "best-fit" opportunities for Tasmania'

On page 22 it is made clear that the 'The opportunities identified in the Tasmanian Emissions Pathway Review will play an important role in the development of the sector-based Emissions Reduction and Resilience Plans'. Does this mean they have no status in the TCCAP? Is the government committing to them? Why reproduce them in this Draft plan with no commitment to any of them? A few of the 'Emissions

reduction opportunities' are included in the statement of goals on page 10 but not the majority of them – why?

Implementation plan

Am I entirely missing the point? Are all my concerns and questions to be addressed in the implementation plan? If so, why is the implementation plan mentioned only once (page 11) in this very long and wordy plan? Why is there no explanation of the purpose of the implementation plan compared with the TCCAP?

Emissions Reduction and Resilience Plans for key sectors

It seems clear that the ERRP for key sectors will have the greatest potential for reducing our carbon emissions – dealing with the key emitting sectors in Tasmania. However, this process is separate from the TCCAP and requires consultation with business and industry but not with the community.

The Climate Change (State Action) Amendment Act states:

5(c) Sector-based emissions reduction and resilience plans

(1) The Minister, in consultation with each relevant portfolio Minister, is to consult with business and industry representatives to develop a sector-based emissions reduction and resilience plan for each of the following sectors:

This puts the community at a decided disadvantage to business and industry.

What are we to deduce is the respective roles of the ERRPs and the TCCAP? There are no guidelines to make it clear what is expected to be in the TCCAP given that the ERRPs seem to be addressing the major sources of carbon emissions.

The government has also decided to not include carbon emission reduction targets for these sectors so those plans will be highly limited in what they can achieve.

Transport ERRP

While it is unclear if comments are being requested on the ERRPs I offer these comments about the transport sector ERRP.

The idea of developing a ERRP for the transport sector is particularly absurd. The Climate Change (State Action) Amendment Act 2021 only requires that minister consults with 'business and industry representatives' but there is no requirement for consultation with the community. Given that most vehicles are owned and operated by private citizens and not businesses and industries, why are they treated as less important and not required to be consulted? The community are the main users (and potential future users) of public transport but are also not required to be consulted on public transport as part of the ERRP. The taxpayers of Tasmania are also the owners of Metro but they are not required to be involved in the discussions about the Metro as part of the ERRP. Private bus fleets are subsidized by the state government but the tax-payers are not required to be

involved in discussions about these fleets as a part of the development of the ERRP.

I can imagine that the State Government will say that there is nothing to prevent the community being involved in the development of the ERRPs and a draft ERRP could be released for broad public comment. But this doesn't address the issue that industry and business are given a special status in the act. The ERRPs cannot be developed without the minister consulting with 'business and industry representatives' but the community consultation is optional. This ensures that 'business and industry representatives' presumably draft the plans and the public only get to respond to what they wish to include.

Where are we heading – our goals

One page 10 there are four goals identified but only the first goal relates to carbon emissions. The first goal is extremely limited. It reads:

Our policies, programs and commitments to reduce emissions, adapt to the impacts of climate change, and strengthen our transition to a low emissions economy, mean by 2030 we will:

- *be maintaining net zero emissions or lower, by implementing key opportunities for Tasmania, including:*

By referring to the key opportunities as 'including' implies that the dot points are not exhaustive. If there are additional 'key opportunities', they should be provided.

All the goals are expressed as addressing a 2030 target. Annual targets should also be included.

The list of goals in the dots points are very limited. The first two are relevant to transport; the third relates to waste; the fourth and fifth relate to LULUCF and the sixth relates to agriculture.

There is no goal specific to the IPPU sector.

Putting aside our concerns regarding the purpose of the ERRPs compared to the TCCAP, the goals need to be more comprehensive. For example the first two goals relate to a very small part of the transport sector.

I will not go through all the goals and respond in this way. What the plan should have done was to identify the key sources of emissions in each sector and provide goals relevant to the biggest contributors. To state a basic axiom, identify the problem and then use this to identify the most appropriate solutions and goals.

Many of the goals are worded imprecisely and some are not justified

– a 100 per cent electric vehicle government fleet

The state government has not clarified what part of the state government is included in this goal, in particular, does it involve all departments and government business enterprises?

– increasing the use of public and active transport

'Increasing the use of' is not a goal. The State Government should identify a target for increased use of public and active transport annually and for 2030.

– reducing the volume of organic waste sent to landfill by 50 per cent

This is worded appropriately but what is the goal beyond 50%?

– improving the management of landscapes to support emissions reduction and resilience, including through carbon farming and precision agriculture technologies

This is a very broad and imprecise statement. While two examples are included it is critical that the full scope, of what is included as 'improving the management of landscapes?', is explained in the goal. What types of 'management' are included and excluded? Carbon farming is not defined.

– increasing new timber plantations, expanding the adoption of agroforestry in Tasmanian farming systems and reducing the conversion of plantations to other land uses

It has not been substantiated that 'reducing the conversion of plantations to other land uses' is a justifiable goal. It is noted that the Forest Practices Authority annual reports have documented a conversion of plantation forests to non-forest uses of over 20,000 hectares over the last five or six years. I have not noted from the FPA reports or other sources that this is problem for the plantation forestry sector. Nor have I noted that conversion of plantation to other uses (presumably pasture) is unwanted.

Expanding the adoption of agroforestry in Tasmanian farming systems could be a positive move but the plan provides inadequate details to form a view.

– reducing livestock emissions by implementing livestock management strategies to reduce methane emissions, including through new feedstock types

Again, 'reducing' is imprecise and too passive for a goal statement. The goal should commit to a specific amount of carbon emissions to be reduced by 2030 and include annual targets.

Yours sincerely



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Climate Change Amendment Act underperforms

The state government's Climate Change (State Action) Amendment Bill finally passed the parliament on 9 November 2022. The next day the Minister for Climate Change, Roger Jaensch, issued a self-congratulatory media release that continues to perpetuate three terrible distortions that few in the media reported.

The minister said the legislation proposes 'the most ambitious legislated emissions reduction target in the nation, and one of the most ambitious in the world', it recognises 'the urgency of action on climate change' and 'clearly outlines our Government's absolute focus on reducing emissions'.

The proposed state-wide target – for Tasmania to be carbon neutral by 2030 - is a sad joke because, as the minister has been saying for years and repeated in his second reading speech to Parliament, Tasmania has been carbon neutral for the last seven years. The target is meaningless, i.e. it won't help reduce carbon emissions because the target is already being met.

Legislated carbon emissions targets are almost always non-binding or aspirational. But targets have great importance because an ambitious target shows that a government is serious and its plan for action should be urgent and ambitious.

How targets are structured can demonstrate that the government expects more from some areas of the economy than others, including government businesses and departments.

The government's legislation only includes a state-wide target for net carbon i.e. emissions minus sequestration. There are no stand-alone targets for carbon emissions reduction and sequestration. There are no legislated year-by-year interim emissions reduction targets. The government explicitly opposed legislating industry sectorial targets.

So after 6 years wait we get a target that says we will continue doing what we have been doing.

Sectoral targets help to spread the responsibility across all sectors and potentially to put greater focus on some underperforming sectors. Including sectorial targets would have helped to address the extraordinary disparity where one industry sector, agriculture and forestry, has been largely responsible for Tasmania's carbon neutral achievement and has hidden the fact that other sectors, in particular transport, have performed very badly.

The minister's reason for not having sectorial targets is a non-reason. The Minister's second reading speech states: 'Given the substantial work underway across industries and sectors, the Government will not legislate

additional sector-based targets...'. Basically the minister says that we should trust big businesses to keep improving their performance.

Urgency seems to be in the eye of the beholder. The Climate Change Bill took almost exactly one year to work its way through the parliament, being introduced on 24 November 2021. But this is nothing compared with the delay in the bill arriving in parliament, with the initial review done in 2016.

Putting aside the six years it has taken to get to a new act, the minister claims the passage of the bill will speed up action, requiring 'the first Climate Change Action Plan within six months' of the act passing and the first sector-based Emissions Reduction and Resilience Plans 'within two years'.

But there is nothing in the act that binds the government to these time frames and in the two years it takes to create sector plans Tasmania has no sector emissions targets. And what will those industry-driven targets be?

The previous climate action plan expired in June 2021. We won't even have sector targets until the end of 2024. How long will we need to wait to find out if these targets are being reached?

Then the plans are in place for five years.

The Minister claims the Government has an absolute focus on reducing emissions. But the government has actually been obsessed with avoiding any focus on reducing emissions. It has been constantly referring to net carbon where the sequestering of carbon by forests disguises our emissions. With the passage of the legislation, it will continue this net carbon con-job.

The minister states in the second reading speech that: 'Responding to consultation feedback, the Bill includes a number of requirements to increase the transparency and accountability in reporting of Tasmania's actions and progress towards our 2030 target.'

The process the minister sets up is not accountability it is just an information-snow job, bombarding the parliament with masses of paper reports, along with all the other reports that are rarely even noticed in parliament. The targets are everything when it comes to accountability but there are no sectorial targets to report on for another two years.

It's hard to see what the purpose is of the government's new climate legislation, other than as a push-back against claims of a climate crisis or emergency which the government refuses to accept. It went in the opposite direction: take as long as possible to do as little as possible and feel good about it.

If you want to get a feel for the government's motivations and interests, I urge you to read the minister's second reading speech, presented when

the bill was brought on for debate. It is illuminating for what the minister doesn't say.

The government has stripped the language of any emotion, any sense of urgency, threats or responsibility.

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The speech never mentions global warming, preferring the blander term 'climate change'. There is no mention of predicted global temperature increases.

There is a near-total avoidance of any statements about the specific causes of carbon emissions such as consumption of petrol and diesel, land clearing etc. The only reference to vehicles is in relation to electric vehicles.

Surprisingly, there is no mention of Marinus, battery of a nation and the associated wind farm developments. It seems the government wants Marinus to go ahead but doesn't want to connect it to addressing global warming. Is Marinus just a way to make money out of generating more renewable electricity?

It is more than two years until the next scheduled state election and there is time for the Liberals to do something serious about reducing carbon emissions. In the absence of meaningful legislation and targets perhaps the government should just invest massively more in its underperforming practical programs. There is certainly room for the Labor Party to have policies that are much better than the Liberal government.

Peter McGlone
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