

This submission responds firstly and succinctly to the four questions posed in the ‘*Consultation Draft – Emissions Reduction and Resilience Plan – Transport*’ [**the Plan**]. It then goes into more detail in considering aspects of the Priority Areas outlined in the Plan in the ‘Draft Plan on a Page’ (p. 2)

How can we build on the work already underway to reduce emissions and build resilience in the transport sector?

The Plan has some worthy elements to improve transport in the State, reduce its emissions and put in place better infrastructure. Unfortunately, it is still trailing the best examples interstate, and compared to worldwide examples, it is lacking in aspiration and application. The Consultation Draft promotes too many generalisations without details of substance.

Key themes obtained through consultation with government, business and industry are valid, but the follow through falls short. It is seen to be timid, instead of bold, with repeated use of the verbs: consider, explore and investigate. Where are the action words to signal commitment to sweeping improvements? When the Plan is prepared to embrace actions, it appears superficial and hollow in many places, with insufficient concrete examples of steps to definitively take Tasmania forward with highly efficient transport that is non-polluting (cutting greenhouse gases and other pollutants that harm health). I present some such options in my discussion of Priority Areas below.

A once-in-a-lifetime opportunity exists with the very consequential demands of the ‘energy transition’ nationally and throughout Tasmania. We are well placed as a state with existing electricity generation by renewables and many options to enhance this — wind, solar, hybrid pumped hydro (small scale) with battery storage, and ocean energy. We must take this opportunity to fully recast transportation in the state.

What future opportunities do you think will have the most impact?

A wealth of opportunities exists; all can have considerable impact. However, it does demand that the Tasmanian Government create a bold vision in a five- to ten-year plan. That is the timespan that we have to tackle climate change and keep global temperature rise close to 1.5°C and definitely below 2°C.

Within that bold plan, the Government need to use the levers that they possess (e.g. targeted rebates, demonstrated adoption of future pathways with their own transport fleet, forward-thinking legislation) and work in harmony with, and encourage, other levels of government to do the same in joint committees and other forums. I provide some examples of initiatives below

Are there any priorities or future opportunities missing from this draft Plan?

Yes – unfortunately, there are many. I canvass several of these below.

Are there other ways we can collaborate to reduce emissions and build resilience in the transport sector?

A balance needs to be struck in the Plan, and broadly within governments at all levels, between tangible actions (and sometimes explicit directions) and education/encouragement of the wider community to embrace change for the benefit of society, environment and ultimately the planet. The Tasmanian Government has to absolutely lead, not to rely on or acquiesce to market forces or other spurious vested influences.

One opportunity for Tasmania to lead has potentially been missed. It is a failing to exclude from the scope of the Plan emissions reduction and resilience measures that support transport to and from Tasmania. If all states (especially Victoria) adopt the same attitude, nothing will be ventured to improve this vital network for Tasmania and the nation, and its not insignificant emissions. Just leaving it to the Commonwealth is abdicating Tasmania's critical interest in ensuring efficient transport links that are shaped for the future. This Plan should have at least put some ideas on the table for other jurisdictions to consider (e.g. cross-strait shipping powered by other than fossil-fuelled engines, more efficient and climate-conscious air transport).

See further comments below about partnerships/collaboration.

Priority areas and future opportunities to reduce emissions – General comments. The Plan is to be applauded for the priority of increasing the use of public and active transport and for the examples of some steps that should facilitate this. However, it does not focus adequately on a key element: vastly improved safety for active transport. Tasmania's road network is a significant disincentive for practitioners of active transport, e.g. lack of effective bicycle lanes, protective road furniture, off-road alternative routes for active transport (more examples like the Inter-city Cycle Way are needed), unresolved regulation of e-scooters (e.g. spacing from pedestrians, cluttering of footpaths), etc.

Opportunity should be taken to radically improve public transport in Tasmania, rather than window-dressing the present failing system (e.g. transit lane on Southern Outlet, Hobart) and frittering away opportunities on trials that are never going to be translated to regular operations. It is clear that Tasmania with its smaller, dispersed and often hilly cities cannot follow the template of larger mainland cities in Australia or elsewhere. Our cities could be described as 'axial', aligned along watercourses or coastlines. Major transport arteries along the main axis should be developed with rapid and efficient larger vehicles, preferably electrified, e.g. articulated buses, light rail/tramways on dedicated routes, or fast ferries [the support for ferry trials on the Derwent Estuary with new stops and routes is a positive element of the Plan]. These main public transport routes should connect at hubs to smaller non-polluting vehicles that fan out into suburbs, moving up hills and into more inaccessible areas. These could be electric people-mover vehicles or small buses operating partially or fully on an on-call basis and with variable optimised routes; they would have prescribed capacity for disabled passengers.

Although the Plan does have a good element for *increasing the number of low-emissions, light vehicles* with the enhanced Statewide Charging Network, it needs to be far more active in following the mainland states in providing EV rebates. I would suggest as in the recent trial by EV supplier Good Car Company that the rebate would be means tested. The reason that a rebate is crucial for Tasmania is that with the oldest cars on the road of any state or territory, urgent action needs to be taken to retire the very oldest vehicles that are significant polluters. A means-tested rebate that could apply to both new and second-hand EVs will potentially help disadvantaged owners of these old fossil-fuelled vehicles to move to low-emitting alternatives. The State also needs to work proactively with the Commonwealth in bringing in new fuel efficiency standards as swiftly as possible. These standards are another lever to favour low-emissions light vehicles.

The most disappointing element of the Plan concerns the measures suggested to *decarbonise heavy transport vehicles*. The 'future opportunities' represent only a meek collection of 'explorations' to improve matters. Much more concrete and ambitious objectives are needed. Heavy vehicles are a major source of emissions and pose other hazards. What other capital city (or even large city) nationally or internationally has so many heavy articulated, transport vehicles using the main thoroughfares as does Hobart? Since the majority of these large vehicles have diesel engines, they not only emit large amounts of greenhouse gases, but they also release a wide range of hazardous

air pollutants, including known carcinogens. Then, their weight on our urban routes disproportionately contributes to degrading of our roads and highways, and in Hobart to damage to our heritage buildings. Hobart is long overdue for heavy vehicle by-passes. Tasmania once had a vital network of railways to transport heavy goods among the main cities. It must be revived with electric locomotives or electrification. Trains are the most efficient and potentially the lowest polluting transport vehicles. Just exploring the decarbonisation of the few existing diesel locomotives is a miserable approach to improving matters of emissions reduction and resilience for transport. With efficient railways, heavy trucks can mostly be distributing locally from hubs located at convenient sites on railway lines just on the periphery of the cities.

With respect to *infrastructure (especially electricity supply) to assist transport move to low-emissions technology and improve resilience*, the Plan is insufficiently imaginative. As well as the concept of using EVs in a bidirectional capacity—charging from the grid, but also when opportune using the EV battery to feed into the grid—the Plan should flag the importance of this capacity as just one part of a far larger initiative. This would see development of community batteries throughout urban areas of Tasmania and other locations where there is excess generation by renewables, or potentially high-demand power users. Effective development of this type of infrastructure where supply and use are centred can decrease the need for, the cost of, and the controversy around, as many new transmission lines.

Supporting action through partnerships. Many opportunities to improve the transport sector by reducing emissions and building resilience arise both through official and tangible partnerships at all levels of government and also via indirect unofficial collaboration (e.g. Tasmanian Government with communities and the entire populace). Unfortunately, the Plan tends to be myopic and insular instead of outward looking and inclusive in that its focus is on mainly what the State Government can do itself. When intergovernmental processes are considered it retreats into vague generalities (referring to arrangements rather than definite steps forward — I provided an example above with the exclusion from the Plan of transport into and out of the State) or otherwise small targets (e.g. National Electric Vehicle Strategy).

Finally, I wish to draw attention to a serious omission from the Plan: *Education*. This is crucial to ultimate success of the Emissions Reduction and Resilience Plan – Transport, in fact for any plan that involves sweeping change for all aspects of transportation. The importance of education is all-encompassing. For example, it should involve: a) vehicle-user awareness of, and courtesy to, greater levels of active transport; b) community appreciation of public transport and its operators; c) safety with new technologies (mention of relevant TasTAFE courses in the Plan is good but they need to be expanded more broadly to encompass the full range of technologies and extent of exposure to these—e.g. trades, emergency services, service industries, general public); and d) improved information and understanding in the Tasmanian population as to what are non-polluting and low-emissions forms of transport, ways in which they can be used efficiently and advantageously, and the importance of life-cycle emissions for any form of transport.

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