

1. Do you support the proposed revised objects of the Act? If not, what other objects should be considered?

I do not support the proposed revised objects.

Objects a and b of the proposed amendment each cover half of theme 1. Theme 2 of the recommendation is not addressed in the proposed amendment. Object a should be expanded to include reporting/monitoring/evaluation. Object b should be replaced with an object that more explicitly addresses actions to reduce greenhouse gas emissions.

In addition, the proposed objects are missing several important aspects of the current objects, including:

- The promotion of energy efficiency and conservation
- The promotion of research and development to abate/reverse climate change
- The promotion of consultation with business and community on actions
- The promotion of contributions towards (inter)national work on climate change issues

2. Do you support the proposed principles to guide decision making? Are there other principles that should be included? If so, why?

I do not support the proposed principles, as they have not prioritised:

- sectors and initiatives that can most cost-effectively achieve emission reductions
- social and economic benefits from Tasmania's standing as a low-carbon economy
- adaptation for at-risk communities

I propose that principles along the following lines be inserted:

- decision making processes prioritise adaptation required in areas with communities at greatest risk from the proposed impacts of climate change.
- decision making processes prioritise emissions reduction in sectors and initiatives where they can be most cost-efficiently realised.
- decision making processes prioritise the social and economic benefits of a low-carbon economy

3. Do you have any other comments or suggestions relating to the proposed amendments to the Act?

Regarding the proposed amendment addressing recommendation 1:

Excluding LULUCF, Tasmania has gone from 8.07Mt emitted in 1990 to 8.06Mt emitted in 2016.

This is a reduction of merely 0.12 per cent from 1990 levels.

The use of LULUCF to offset greenhouse emissions has been widely criticised. It would be best if reporting did not take LULUCF into account, and more expedient action pursued on reductions in all sectors.

However, if the government wishes to continue using LULUCF in its emissions calculations, it should consider a net negative target instead of maintaining current emissions.

Regarding the proposed amendment addressing recommendation 3:

The amendment should more explicitly state that risk management must be undertaken with consideration of the effects of climate change.

Climate change will have increasing and worsening impacts. All planning and risk assessment should consider it.

It is short-sighted to balance climate change mitigation with economic growth, given the long-term economic impacts of failing to adequately prepare for the risks posed.

Regarding the proposed amendment addressing recommendation 5:

The government has provided insufficient reasoning for its refusal to make compliance with the Climate Change Action Plan a statutory requirement.

The difficulty involved in adherence to a CCAP should be an argument for holding the government to that standard, not an argument for effectively making it optional.