



20 November 2018

Ms Sophie Muller  
Director  
Tasmanian Climate Change Office  
GPO Box 123  
HOBART TAS 7001

**Via Email**

Dear Ms Muller

### ***CLIMATE CHANGE (STATE ACTION) ACT 2008***

The Southern Tasmanian Councils Authority (STCA) welcomes the opportunity to submit to the Amending the *Climate Change (State Action) Act 2008* public consultation. A detailed submission is enclosed.

Overall the STCA supports the implementation and regular review of the Act, as part of a suite of actions needed to reduce greenhouse gas emissions in southern Tasmania and respond to climate change.

Local governments are at the frontline in dealing with climate change and the STCA proactively established the Regional Climate Change Initiative (RCCI) in 2010 to support and coordinate climate change action by its member councils.

The 12 southern Tasmanian councils are important stakeholders as community leaders and managers of over 30,000 council-owned assets. We play a key role in providing up-to-date and reliable climate change information to our communities and assisting them to transition to low carbon economies and prepare and respond to a changed climate and related impacts.

Through the RCCI a range of projects have delivered positive outcomes for local communities, such as lower energy costs and emissions, increased climate resilience and healthier spaces.

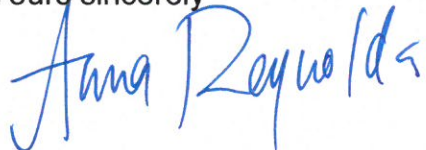
Our recent regional energy and greenhouse gas project identified that the communities we represent created an estimated 64 per cent of Tasmania's energy sector greenhouse gas emissions and that more than 13,000 renewable energy systems are installed across southern Tasmania creating 39 million electricity units returned to the grid in 2016-17. This will be used to inform a Regional Strategy that covers both mitigation and adaptation.

Our Regional Home Energy Bulk Buy program, 2017 to 2018, saw a total of 372 energy efficiency products installed in households. This represents household cost savings estimated at \$195,852 per annum and \$4,006,508 over the lifetime of the products and emissions reductions of 14,836 eCO<sub>2</sub>t and energy savings of 28,412 MWh.

The review and potential strengthening of the Climate Change (State Action) Act is seen as a significant complement to our ongoing climate work program and will provide clear demonstration of the Tasmanian government's commitment to ongoing action on climate change.

On behalf of the 12 member southern Tasmanian member councils of the STCA, we thank you for the opportunity to submit and opportunities to collaborate to reduce greenhouse gas emissions in southern Tasmania and respond to climate change.

Yours sincerely



(Alderman Anna Reynolds)

**CHAIR - SOUTHERN TASMANIAN COUNCILS AUTHORITY**

**Submission to the Amending the *Climate Change (State Action) Act 2008*  
Public Consultation by the Regional Climate Change Initiative, Southern  
Tasmanian Councils Authority:**

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

The emphasis on mitigation should be clearer, it is inferred through target setting, yet action as well as reporting is required.

Overall, the STCA supports the proposed revised objects of the Act.

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

Key terms should be stronger, such as:

- 'are required to consider' instead of 'take into account', principle (a,c)
- 'consistency instead of 'complement', principle (b)
- 'must' instead of 'desirable', principle (e)

Overall the STCA supports the proposed principles to guide decision making by the Tasmanian Government.

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

There are important elements that are absent, such as:

- A legislated climate change fund; to secure funding beyond financial years and from third party sources. A range of third party funding sources are available in the health sector, commercial sector, philanthropic bodies and other government departments, these funding opportunities are currently lost. There is a gap to provide a trustworthy and accountable way of sourcing and administering funds to finance projects that deliver a range of positive outcomes for Tasmanians
- Requirements to set and report against interim targets, ensuring greater transparency and accountability for action from year to year
- Requirements to set sector based target, facilitating a focus on key emissions sources

- Clear articulation of State Government roles and responsibilities in regard to both mitigation and adaptation and how it will support councils in local climate change responses and leadership. For example there is significant community confusion surrounding ownership of decision-making following extreme events, or jurisdiction for sectors and assets. Without clear ownership duplication of resourcing occurs, inefficiencies and poor communication.

The STCA supports the proposed amendments to the *Climate Change (State Action) Act 2008* and notes that with the above suggestions it can be improved.

The STCA does not support a review of the *Climate Change (State Action) Act 2008* in line with election cycles. A key barrier in the climate change sector is lack of certainty regarding government policy. The Act should provide enough flexibility to allow for successive governments to develop new programs and policies without creating a rate of change that is logistically challenging and creates confusion.