Monday, 18 July 2016

Tasmanian Climate Change Office
Department of Premier and Cabinet,
GPO Box 123,
HOBART, Tas., 7001

Submission - review of the Climate Change Act

Break O'Day Council is concerned about the implications and impact of climate change and global warming on the municipality and welcomes the opportunity to participate in the review of the Climate Change (State Action) Act 2008.

Break O'Day Council has completed an extensive Responding to Climate Change study as part of its recent Municipal Management Plan program, a Corporate Climate Change Adaptation Plan produced through the Regional Council’s Climate Change Adaptation Project, and has undertaken a number of climate change adaptation projects focussed on inundation risks with the assistance of several other Tasmanian Government programs.

Weather events over the last 12 months have highlighted again for Council the serious adaptation challenges the Break O'Day community faces. It was flood impacts on the Lower George River flood plain that a decade ago led Council to look into sea-level rise and extreme weather risks around Georges Bay with state support and gain experience in addressing climate change in the municipality.

As a small regional community and Council both adaptation and mitigation are a challenge and Break O'Day Council appreciates past state level support and the role the dedicated Climate Change (State Action) Act can play. We look forward to continuing support and partnerships in meeting future climate change.

Council has read and considered the Discussion Paper - Independent review of the Climate Change (State Action) Act 2008 released by the Tasmanian Climate Change Office (dated 20 June 2016) and has the following comments and feedback, using the papers suggested questions.

from the mountains to the sea
1. The Act aims to help Tasmania respond to the challenges posed by climate change. What do you consider are the critical challenges to which this legislation and Government action should respond?

Some are

1. Community support and engagement in transitioning to a low-emissions economy and living.
2. Adaptation: to extreme weather related risks, jolts and shifts in primary production, tourism and other economic sectors, pressure on land use and development planning control systems, and migration of biodiversity systems.
3. Support economic and business development regionally to achieve low-emissions growth and transformation, including incentives.
4. Energy industry, networks and market restructuring; support for communities and local government to participate with local renewable energy, on a ‘level playing field’.

5. With Tasmania providing just 0.3% of national emissions, how important is it that the Act supports the achievement of national and international targets for climate change?

0.3% is a temporarily low share – recent levels of negative emissions (sequestration) by forests will not continue indefinitely. Tasmania’s population is near 3% of the nations and its emissions trended at about ten times what they are at present not so long ago.

Tasmania should at least carry its fair share, and better still aim for “best in the world” and to ‘punch above its weight’ in helping the nation achieve its and international targets. Tasmania should continue to develop new and larger renewable energy supplies and increase energy efficiency.

6. Should the Act recognise the possibility of 2°C of warming as a means of driving action on climate resilience?

Yes, in line with the COP21 Paris Agreement and ‘Under 2 MOU’ for sub-national governments.

7. What should the Act include to help Tasmania build resilience to climate change?

Some ideas are

1. Set prudent thresholds for future sea-level rise impacts on shorelines and flood and inundation risks.
2. Diversification of renewable energy sources and supply for Tasmania.
3. Influence on other legislative and regulatory systems to: expedite responses to events, for example new invasive species incursions or technology and innovation opportunities; and to review them to ensure they are adapting to climate change by supporting mitigation and adaptation.
4. Support for low-energy transitions in the transport sector, for example rail.
5. A state ‘Adaptation Facility’ to provide long term ‘insurance’ fund to help the Tasmanian community adapt and recover following future shocks and events.

8. How can the Act facilitate action on climate change at state and local levels and among businesses and the broader Tasmanian community?

Some measures would be

1. Establish a framework for land use and development and emergency management decision makers to give them prudent benchmarks for climate change related hazards and legal certainty for their decisions.
2. Require decisions in other areas of government to consider and account for climate change mitigation and adaptation implications. Including prudent Planning Scheme provisions.

9. To what extent should Tasmania rely on the Land Use-Land Use Change Forestry emissions sector to achieve its emissions reduction target?

LULUCF emissions should be accounted for. However negative emissions (bio-sequestration) generally should not be relied upon since they are largely only returning what was on the land originally, before fossil fuels were burnt on mass. LULUCF reductions in emissions should not be used in emissions accounting to offset emissions from fossil fuel sources.

However the value of LULUCF reductions in emissions may be useful as a driver for landscape scale native reafforestation, and the capture of atmospheric carbon.

10. What 2050 emissions reduction target would you consider is consistent with Tasmania seeking to be an international leader on climate change?

2 t CO2e per capita, as sought by the Under 2 MOU, and excluding LULUCF and including emissions attributable to imported electricity.

And an overall net zero emissions target for Tasmania.

11. Should Tasmania’s targets account for emissions and abatement associated with its importation and export of electricity?

Yes, include ‘Scope 2 emissions’. And the profits from electricity trading (higher priced renewable electricity to the mainland) should be invested in achieving climate change mitigation and adaptation outcomes.
12. What other types of emissions reduction target should be considered (e.g. interim, sectoral, energy efficiency, mandatory/voluntary)?

An energy efficiency target aimed at older housing stock (pre 6-stars) and lower income households and leading to programs and incentives to achieve the target.

13. How willing would your business, community group, local government or region be to commit to pledges to reduce emissions?

Break O'Day Council is interested in developing a local mitigation program driven by an emissions target. Our first barrier however is not having capacity for emissions monitoring and accounting. The Act may have a role in providing the information infrastructure and frameworks for local level emissions monitoring and accounting by extending its targets, reporting and mainstreaming provisions.

14. What do you consider might be appropriate principles to guide government decision-making which influences climate risks and greenhouse gas emissions?

Some principles would be

1. Climate change action is based on scientific evidence.
2. Seek solutions that are over time, cost neutral or positive.
3. Climate change action is morally an intergenerational responsibility

Yours sincerely

Mick Tucker
Mayor