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Department of Premier and Cabinet
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Sent by email: policy@dpac.tas.gov.au

Submission - *Tasmania's proposed Sustainability Strategy*

From the Tasmanian Independent Science Council: <http://tassciencecouncil.org>

Composed of scientists and other professionals, the Tasmanian Independent Science Council (TISC) is dedicated to science-based policy reform to ensure the long-term health of Tasmania's environment. We welcome this opportunity to make a submission about Tasmania's plans to create a sustainability strategy, as outlined in the government's consultation and discussion papers.

We support efforts to give Tasmania a strategic, long-term plan to protect and enhance the well-being of the state's residents and the quality of their natural environment. The papers' suggested goals in principle contain some useful directions for Tasmania that build on the widely-endorsed UN Sustainable Development Goals, including to create a circular economy, enhance biodiversity, reduce greenhouse gas emissions and foster climate resilience, along with addressing social justice considerations that include empowerment of Aboriginal Tasmanians. We also concur with the papers' sentiment that pursuit of sustainability should be a shared commitment involving the private sector, the university, and community groups rather than just be a top-down, government-driven agenda.

The record to date of sustainability plans and policies adopted in many jurisdictions around the world suggests they are very prone to offering just vague commitments and feel-good platitudes without means of tracking progress, meaningfully involving stakeholders and holding responsible parties accountable. Given Tasmania's existing experience with the sustainability agenda, particularly the explicit reference to it in

Tasmania's Resource Management and Planning System adopted in 1993, it is vital to ensure that a new sustainability strategy avoid the deficiencies of past efforts.

Therefore, the TISC suggests that a new Sustainability Strategy be organised with the following governance standards and procedures to ensure participatory, effective, and accountable decision-making:

1. ***Prioritise goals.*** Enunciation of a long-list of goals under the rubric of "sustainability" can be problematic where it fails to indicate the relative importance of each goal. Sometimes goals may even be in conflict, especially goals that imply economic growth versus protection of natural capital. If the relative importance of goals is not pre-determined, so that priorities are understood, there is a serious risk of confusing and unaccountable decision-making. We therefore recommend that the Sustainability Strategy's goals be ranked in order of importance, or at least identify the principal priority. That priority should be maintenance of ecological integrity and climate resilience, as they are preconditions to the pursuit of the social and economic goals of sustainability.
2. ***Legislated mandates.*** Decision-making to implement a Sustainability Strategy should be tied to legislated accountability. The State Policies and Projects Act 1993 illustrates one way this might be achieved, whereby sustainability policy goals are formulated as legally binding considerations for decision makers at state and local government. However, existing (somewhat poor) compliance with this legislation also suggests that more is needed, such as stronger mechanisms for the public to raise any concerns about noncompliance and for sanctions to be available to respond to performance failures.
3. ***Ongoing monitoring and regular reporting.*** Progress towards sustainability requires regular monitoring and public reporting, so that all Tasmanians can judge whether the strategy is working and whether any interventions or changes might need to be made. Tasmania's existing record of state-of-the-environment reporting has been woefully inadequate: the last report was issued

in 2009, and the belated, rushed effort now underway risks creating a substandard report (in breach of the requirement for such reporting every 5 years, under section 29 of the State Policies and Projects Act). Without robust systems of monitoring and reporting, Tasmanians cannot have confidence that investments in a sustainability strategy will be working.

4. ***Independent oversight.*** Independent oversight of implementation of a strategy is vital for the integrity of the entire process. We recommend following the example of some other jurisdictions (eg, the state of Victoria, and the province of Ontario, Canada) to appoint an independent commissioner. For instance, Victoria's Commissioner for Environmental Sustainability has an ambitious mandate that includes to "report on matters relating to the condition of the natural environment" and "encourage decision making that facilitates ecologically sustainable development" (see Commissioner for Environmental Sustainability Act 2003, and <https://www.ces.vic.gov.au/about>). We recommend close consideration of this precedent and other examples to ensure that Tasmania's sustainability strategy is launched in conjunction with the creation of a well-resourced, independent oversight body, with powers to report directly to parliament.

In conclusion, the TISC welcomes efforts to improve Tasmania's path to sustainability, but strongly recommends that the focus conveyed by the consultation and discussion papers be supplemented by creation of a robust governance framework that ensures participatory, effective and accountable decision-making.

Submitted by Professor Benjamin J. Richardson on behalf of the Tasmanian Independent Science Council