



The Executive Officer
Climate Change Interdepartmental Committee
Strategic Policy Division
DPWI
GPO Box 44
Hobart 7001

January 26, 2007

Dear Executive Officer

The Launceston Environment Centre (LEC) is pleased to present a submission commenting on the Draft Climate Change Strategy for Tasmania.

Our submission has been compiled through advice from Andrew Nance of the Adelaide-based consulting firm Sustainable Focus (see www.sustainablefocus.com.au for more information on Sustainable Focus), Dr. Melissa Nursey-Bray and the LEC Board.

Introduction

Overall, the LEC would like to congratulate the Tasmanian Government for attempting to establish a climate change strategy and for encouraging the Australian Government to sign up to the Kyoto Protocol.

We further commend the Tasmanian Government and the work it has commissioned on examining the impacts of climate change upon Tasmania's coast through the excellent work produced by Chris Sharples.

However, the LEC believes the draft strategy proposed by the Tasmanian Government reads more like a vision statement than a strategic plan. Moreover, the strategy when indicating that Tasmania is currently doing sufficiently well understates the issue.

The strategy is particularly weak in the area of dealing with emissions and emission reduction, primarily because of the misleading assumption that Tasmanian's are low greenhouse gas emitters.

1. Clarification of Tasmania's position as a high greenhouse gas emitter

The draft strategy clearly understates the issue. The language used throughout is weak, fails to convey the seriousness of the issue and is at times misleading. For example, the goal to 'maintain Tasmania's status as a low greenhouse gas emitter' is untrue, and does not context the issue properly in relation to Australia's status internationally as being per capita, the World's highest greenhouse gas emitter.

To give this a Tasmanian context, we are higher emitters than citizens of the US. On a per capita basis, Tasmanians emit 22 tonnes of CO₂ per year, whereas the US emits 18.1 tonnes per capita¹.

Therefore, the draft climate change strategy should be amended to clarify Tasmania's status as a high greenhouse gas emitter in a global context and the strategy should then outline aims to make Tasmania a low greenhouse gas emitter.

¹ Environment SA from
http://www.environment.sa.gov.au/reporting/atmosphere/climate_change/annual_emissions.html viewed on 17/1/07

2. Over-reliance on one report

While the strategy mentions a few other sources, the robustness of the climate change strategy has been undermined by its reliance on the report produced by the CSIRO in conjunction with Hydro Tasmania and Tasmanian Partnership Advanced Computing².

This report only tested one climate change scenario, which primarily focused upon the impact of climate change on Hydro Tasmania's water storages. Other work, such as that produced by Dr Manuel Nunez³ should also be considered to help inform the content of the strategy. This may have been so, but due to the absence of a reference list, we are unable to determine what literature has been considered.

In order to meet its aim of ensuring the 'strategy will be undertaken every three years to ensure it reflects the most up-to-date knowledge and understanding of climate change, its impacts and the most effective responses'⁴ the strategy needs to take into account and identify other information bases in order to be credible.

3. Goals

The goals of the draft climate change strategy contain a glaring omission. That is a commitment to reduce emissions of Co2. Climate change is a global issue and avoiding catastrophic climate change requires a significant reduction in Co2 emissions by all sectors of the international community.⁵

As a member of the international community, Tasmania has a duty to reduce the emissions produced in this state. This is particularly important given Tasmania's status as a high Co2 emitter. Therefore, the LEC believes that the number one goal identified by the document should be for Tasmania to support and contribute to global efforts to stabilise and reduce emissions of Co2 released into the atmosphere.

In turn, this commitment must be consolidated with commitments by the Tasmanian government to a series of targets that reduce the level of emissions of Co2 produced by Tasmania by 80%. The most strategic way of achieving such a reduction in emissions would be to set interim targets, such as a 25% reduction in Co2 emissions by 2020, 50% by 2040 and 80% by 2050.

These binding targets would not only make the Tasmanian climate change strategy consistent with recommendations made in the Stern Review which states 'ultimately, stabilization [of 430 ppm of Co2 in the atmosphere]...requires that annual emissions be brought down to more than 80% below current levels'⁶, but would also establish the state of Tasmania as a leader in the climate change arena.

The Stern Review draws heavily upon the research conducted by the Hadley Centre and it would be strategic for the Tasmanian Government to make linkages with this organisation. The Hadley Centre could provide the Tasmanian government with significant advice and support in the rollout of any strategy to deal with a changing climate.

We reiterate that it doesn't matter whether Tasmania is small or not, it is a necessity that in order to avoid catastrophic climate change in the future everyone must cut their emissions.

4. Governance

² Peter McIntosh, Mike Pook and John McGregor, 2005, Study of Future and Current Climate: A Scenario for the Tasmanian Region, Stages 2 and 3.

³ Manuel Nunez, Tasmanian future water environments using a climate model, School of Geography and Environmental Studies, UTAS.

⁴ Draft Climate Change Strategy for Tasmania, 2006, p.32, DPIW.

⁵ See The Revenge of Gaia (2006) by Professor James Lovelock the founder of Earth Sciences.

⁶ Stern Review -The Economics of Climate Change, summary of conclusions, 2006 from http://www.hm-treasury.gov.uk/media/8A8/C1/Summary_of_Conclusions.pdf viewed on January 22, 2007.

The statutory status of the proposed climate change strategy is not clear. Will the strategy become policy with legislative powers? There is no discussion on the relationship between the climate change strategy and other policies such as the Coastal Management Strategy for Tasmania. How will the strategy interact with federal legislation?

These considerable questions have not been answered in the draft climate change strategy but should be addressed within the implementation plan, as the answers may determine how effective the strategy will be.

5. Government leadership

The climate change strategy provides the Tasmanian Government with an opportunity to show leadership on reducing emissions.

The strategy should recommend that a full audit of government owned or controlled enterprises, buildings, vehicles etc. be conducted. Strategies then should be put in place to demonstrate how to reduce emissions by 80%. As suggested above, this could include interim targets such as reducing emissions from government owned vehicles by 25% by 2020.

6. Adaptation strategies

The strategies suggested for climate change adaptation are insufficient. They 'encourage participation' and 'promote awareness' etc. For example, "the State government is working with local government and facilitated seminars and forums, particularly for councils, to encourage discussion about the integration of land-use and transport planning within planning schemes". Surely, adaptation strategies in the area of land-use response to climate needs more than 'encouraging discussion' or 'facilitated seminars and forums'.

There are many examples of other governments at all levels worldwide taking actual action on adaptation and mitigation, that go beyond promotion, participation and involvement in committees and meetings. Many of these could be used as a template for the action plan and suggestions for adaptation in the strategy (this is discussed further in section 11).

7. The action plan

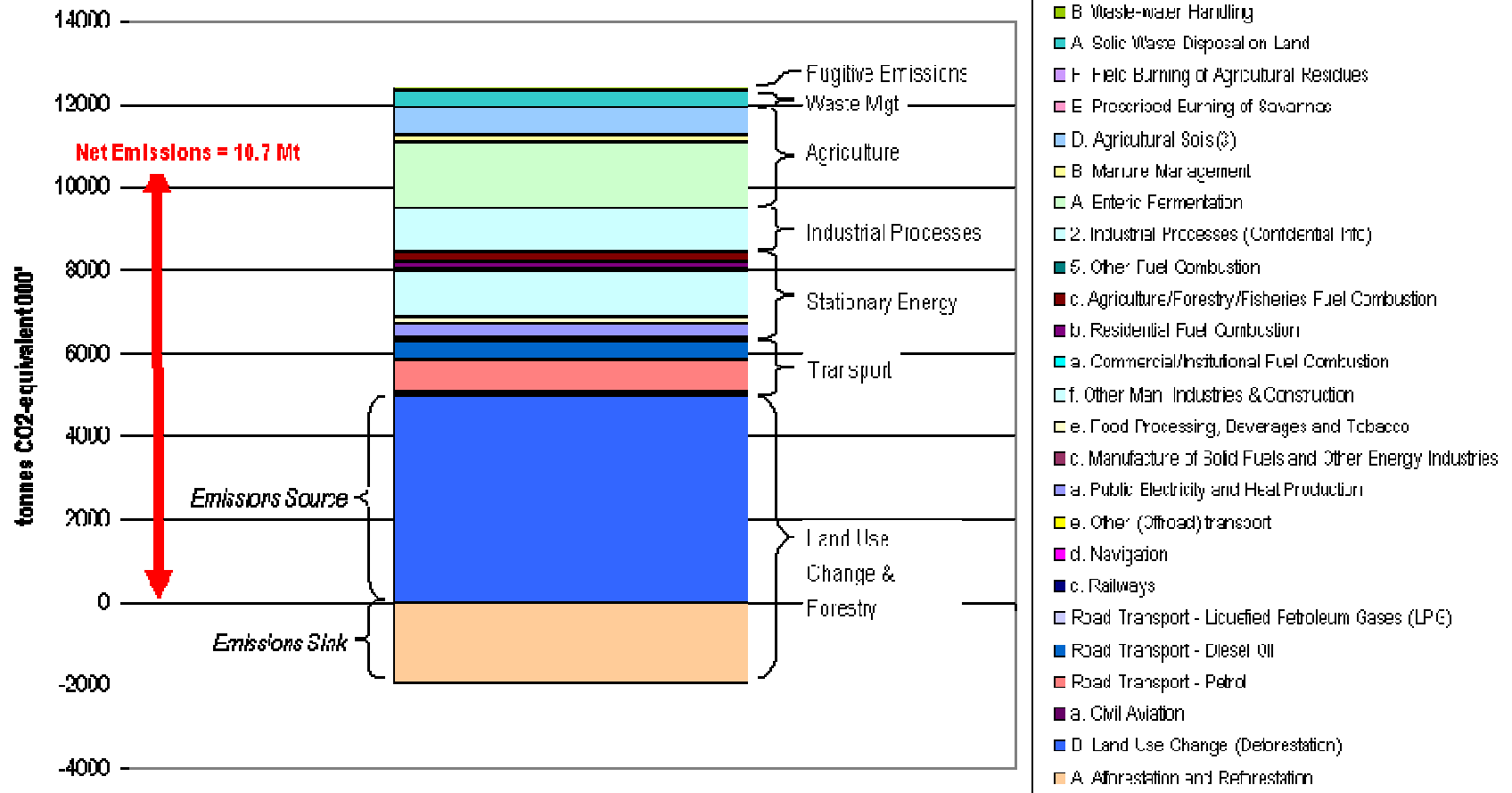
The action plan is not an action plan but a draft set of areas that could potentially be acted upon in the future.

Although the rhetoric of the action plan is worthy, its substance is too broad resulting in a program that means and delivers little in real terms.

This is because the strategy has not been formulated to examine each of the emissions sectors as identified in the State Greenhouse Gas Inventory.

The following diagram should be used as the basis to formulate an action plan. Each emissions sector is clearly identified and individual strategies should be developed against each one.

Tasmanian GH Inventory 2004



Source: Andrew Nance, Sustainable Focus, compiled from the Tasmanian State Greenhouse Gas Inventory 2004

For example, under the area identified as transport, strategies should be identified on how to improve efficiency of the transport sector, how to reduce the number of vehicles traveling on Tasmania's roads, move both people and freight to the railways or simply identify how items such as food, can be moved around the state less.

Another example illustrated by the diagram shows enteric fermentation as a significant portion of Tasmania's greenhouse gas emissions. Strategies could be identified as to how the farming community could introduce new foods that reduce the amount of methane produced by livestock.

These suggestions are simple, but they would go a considerable way to reducing Tasmania's greenhouse gas emissions. Such strategies also go a considerable way towards dealing with the conundrum of reconciling economic growth with an emission reduction strategy. The strategy as it is currently drafted does not deal with this issue very well.

8. Land use change and forestry

The diagram above clearly indicates that land-use change and forestry is the largest single source of emissions of greenhouse gases in Tasmania. Although some forestry activity acts as an emissions sink, any reliance on this method of carbon sequestration must be treated very carefully.

The revegetation of cleared land is not a way of securing carbon for the long term and offers no long term security. For example, a change in government could result in large areas of revegetated land being cleared for other purposes. Therefore, the only real way to keep carbon out of the atmosphere in the long-term is to reduce its use in society.

9. Implementation plan

The strategy should include an implementation plan which provides a firm idea as to how, where and when the government is going to meet the commitments in the strategy.

At present there is no commitment in the document to real dollars. How much does the government anticipate spending on implementing the strategy? For example, the action plan states in relation to agriculture and climate change that it will "expand guidelines of good agricultural practice and to minimise greenhouse gas emissions by maintaining organic soil matter, minimising soil nitrogen losses and other actions... [and] encourage farmers to participate in the Landcare Greenhouse Challenge Plus Programme". However, the strategy does not outline what funds will be put into this. A strategy must do this.

10. Tascentric

Although we appreciate this is a strategy for Tasmania, the 'Tascentric' focus of the document fails to appreciate the relationship between climate change in Tasmania and climate change and the world. For example, patterns of human migration will shift and change markedly with significant social, economic and political impact. As identified in the Stern Review, failure to act now will have significant consequences for the global economy.

This will inevitably have an impact upon Tasmania. Therefore, the climate change strategy must include a strategic plan on how Tasmania will cope with any significant downturn in the global economy as a consequence of the international community's failure to act now to reduce emissions of greenhouse gases. The economic viability of a world-scale pulp mill in Tasmania's north will be undermined by a significant downturn in global economic activity and the climate change strategy must identify how Tasmania would deal with this.

11. Learning by others



Recently, the British company Marks & Spencer released a climate change strategy to become carbon neutral in five years. This is an audacious plan that will cost 200 million pounds and will result in the equivalent of taking 100,000 cars off the road each year. Some of the strategic initiatives include:

- **Showing leadership:** M&S are reducing the amount of energy used in their stores by 25% and powering them with renewable energy sources such as 'anaerobic digestion' where they will generate energy by burning waste from their food halls, farms and factories⁷. The Tasmanian government could do the same with your building stock and offer incentives to Tasmanian business owners to do likewise.
- **Using 50% bio-diesel in all M&S trucks**⁸. The Tasmanian government could convert their fleet of vehicles to bio fuels and lease low emission vehicles. At the very least, the Tasmanian Government should stop leasing V8 and V6 inefficient vehicles.
- **Using only wood which is recycled or certified as coming from a sustainable source by the Forest Stewardship Council**⁹. The Tasmanian government could do likewise and only use wood products such as printer/photocopier paper and marketing materials that come from recycled and FSC certified sources.

These are just three examples of strategic initiatives to reduce emissions at the company level. Tasmania is in a sensational position to recommend the implementation of such initiatives in a climate change strategy. We have a small population and economy that could easily be managed in such a way. This is an opportunity for dynamic thinking that encourages innovation and World's best practice.

12. Conclusion

The Australian public is constantly bombarded within the media and Australian governments are critiqued around the World about the implications of doing nothing to reduce emissions of greenhouse gases. In this context, the LEC commends the Tasmanian government on taking the important first step of developing a climate change strategy and establishing a future direction for the State. We commend the recommendation to sign up to Kyoto and the commitment to leadership and action in the strategy.

However, we reiterate our view that the climate change strategy needs significant re-drafting and that its failure to acknowledge the real importance of the challenge facing Tasmania is a crucial flaw. The strategy needs to strengthen its commitments and language and develop a stringent implementation plan with funds and enforcement mechanisms embedded within it.

Most importantly, the strategy needs to focus not just on adaptation but establish a serious mitigation program, such as a solid commitment to reduce our emissions by the setting of targets.

To meet the challenge of climate change and show true leadership will take more than the initiation of conventional processes suggested in this strategy. Many exciting and innovative models and opportunities are now available that could help the government lead the World and Australia meet the climate challenge in an efficient and rigorous way. Just because Tasmania is small doesn't mean we shouldn't be thinking big.

The LEC looks forward to working with the Department on progressing these opportunities and amendments to the draft in a productive way.

Yours sincerely

Rob Palmer
(LEC Coordinator)

⁷ M&S Plan A from <http://www2.marksandspencer.com/thecompany/plana/index.shtml> viewed on January 25, 2007.

⁸ Ibid

⁹ Ibid