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Climate Change Office Renewables, Climate and Future Industries Tasmania Department of State Growth GPO Box 536 HOBART TAS 7001 Via: <u>climatechange@recfit.tas.gov.au</u>

To whom it may concern,

Thank you for the opportunity to make a submission to the *Tasmania's Draft Climate Change Action Plan 2023-25* (the Draft Plan).

Regrettably, this document is no more than a deceptive image management exercise. It does not detail new measures, is misleading about Tasmania's current trajectory of carbon emissions, and fails to meet its statutory requirements.

This report represents, both implicitly and through omission or false statements, that the "best-fit" emissions scenario from the *Tasmanian Emissions Pathway Review* is the trajectory this Draft Plan would set our state on.

The Draft Plan falls short of out-right claiming the Government is on this "best-fit" pathway. However, claims that measures are ". . . *already technically and economically achievable and align with current policy settings*", and the large focus throughout the Plan on the 'best-fit' pathway strongly imply that's where we're headed.

The Draft Plan also models the best-fit scenario versus the business-as-usual scenario under the heading: *"How will the target of net zero emissions, or lower, from 2030 impact our economy?"*. This falsely suggests the Draft Plan would put Tasmania on a pathway that is different to a "business-as-usual" one.

In reality, for us to reduce state emissions in line with the best-fit pathway the Government has to adopt new policies. The Tasmanian Emissions Pathway Review was clear about this. It said:

"... the best-fit pathway will require action from the Tasmanian Government (through policy and programmatic support) to encourage the implementation of the identified emissions reduction measures."

The Draft Plan basically only describes existing government policies. Without extra and different policies, Tasmania will remain on a business-as-usual emissions trajectory – resulting in substantial emissions' growth across most sectors. For most of the years between 2030 and 2050 under business-as-usual, Tasmania would have net positive carbon emissions. We would fail to meet our state's emissions' reduction target.

Global emissions are projected to passed the dangerous 1.5 degrees limit in the next decade, yet this Draft Plan if enacted would support Tasmanian sectors to follow an expanding emissions pathway.

Under the *Climate Change (State Action) Act 2008*, our Climate Change Action Plan *must* contain actions that will reduce Tasmania's greenhouse gas emissions. It must take account of Tasmania's emissions reduction target, which is legislated to be (not more than) net zero from 2030 onwards.

We submit the Draft Plan fails to adequately address these requirements.

1. The Draft Plan is not a plan at all. A plan is *"a detailed proposal for doing or achieving something"* or *"an intention or decision about what one is going to do"*.

However, this Draft Plan is principally a report of what has already happened. At the same time, it insinuates Tasmania's reduction pathway is higher than the one we actually are on. It contains no commitments, ambitions or goals for the future.

2. The Act also requires that "... a climate change action plan **must** include details of the emissions reduction measures that Tasmania will adopt." This Draft Plan fails to do this. It outlines measures that have already been adopted.

Under the 'best-fit' scenario, the modelling assumes some of the recommended measures will be *adopted* by 2025. This Draft Plan runs from 2023-2025, yet none of the steps towards these measures are proposed within it.

In reality, for the measures that are supposed to be adopted by 2025, the government will need to be developing them at least a year ahead of then. The Draft Plan has to outline this process, and it can't delay the detail until the sectorbased Emissions Reduction and Resilience Plans are finalised (due late this year for Transport, and by 2024 for all other sectors).

The policies to guide serious reduction in emissions for each industry sector cannot be consulted on, developed, and enacted in mere months.

This Draft Plan reveals a grand scale indifference on the Government's part to meaningful climate action, and to sincerely acquitting its legislated requirement to put Tasmania on an agreed carbon reduction pathway.

In summary, the Draft Plan represents the Government's commitment to a pathway that will prevent the 'best-fit' scenario from eventuating.

On that basis, and in light of the urgent requirement for all governments to do everything possible to wind back carbon emissions, the Greens' only recommendation to this consultation is to start again.

The Government must outline their clear commitment to implementing the policies that are needed to steer Tasmania towards a safer climate future. This is essential for community security and resilience, and for industry viability. The Draft Plan needs to be redrafted to outline the policy measures the Government would adopt, with timelines, so that Tasmania can truly meet the 'best-fit' emissions reduction scenario.

Yours sincerely,

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