Summary and Review of the Climate Act/Plan Submissions

Ben L Parr
Tasmanian Policy Exchange, Office of the Vice Chancellor
University of Tasmania
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Summary

In May 2021, the Tasmanian Climate Change Office announced that they were welcoming submissions on the next iteration of the Tasmanian Climate Change Act, and Tasmania's next Climate Change Plan. The submission processes ran over parallel timeframes, which meant that submissions to both were due on 29 April 2021. The Tasmanian Policy Exchange coordinated a single UTAS-wide submission that responded to the key issues and questions on the Act and Plan combined. Our submission appears on the TCCO submissions page landing page for both processes. [1]

This briefer provides a summary and review of the 34 organisations that made publicly available submissions to the Act, and the 22 submissions on the Plan (14 and 16 individuals respectively lodged submissions; and 6 and 3 submissions were lodged confidentially – neither group were included in our review). As Table 1 shows, there were a number of organisations that lodged one submission that covered both the Act and the Plan as UTAS did.

The proceeding summary and review focuses on four key themes found in the submissions: Threats, Principles, End Users, and Sectoral Targets. The key findings were:

1. Threats: Strong concern was conveyed across the submissions about the threat posed by unmitigated global warming.

2. Principles: Four major principles/ approaches were present in the submissions: disclosure, leadership/vision, mainstreaming, and intergenerational equity.

3. End Users: Transport emission reduction opportunities attracted significant attention, as did hydrogen (under industry/energy) with strong and widespread criticism conveyed about LULUFC.

4. Sector targets: The submissions overwhelmingly supported a sector-based approach to emissions reductions in Tasmania, however, different views emerged as to whether targets should be legislated.

[1] http://www.dpac.tas.gov.au/divisions/climatechange/Climate_Change_Priorities/review_of_the_climate_change_act (Act)
http://www.dpac.tas.gov.au/divisions/climatechange/tasmanias_climate_change_action_plan_20172021 (Plan)

Table 1: Organisations that Lodged a Submission to the Climate Act and or Climate Plan

Submissions to the Climate Act	Submissions to the Climate Plan
	Action for Climate North West Tasmania
Australia Institute Tasmania	Australia Institute Tasmania
Australian Energy Council	
Australian Medical Association	
	Bicycle Network Tasmania
	BP Dover
Break O'Day Council	Break O'Day Council
Brighton Council	Brighton Council
Cement Industry Federation	
Cement, Concrete & Aggregates Australia	
City of Hobart (HCC)Senior Climate Change Officer	City of Hobart (HCC)Senior Climate Change Officer
Clean Energy Council	
Climate Action North West Tasmania	
Climate Tasmania	Climate Tasmania
ClimateWorks Australia (to Act)	ClimateWorks Australia (to Plan)
Commissioner for Children and Young People	
	CSIRO
Doctors for the Environment	Doctors for the Environment
Environmental Defenders Office	Environmental Defenders Office
Farmers for Climate Action	
Hydro Tasmania	Hydro Tasmania
Launceston Chamber of Commerce	Launceston Chamber of Commerce
Local Government Association of Tasmania	Local Government Association of Tasmania
Natural Impact Group	
Private Forests Tasmania (to Act)	Private Forests Tasmania (to Plan)
Southern Tasmanian Councils Authority (Same submission as HCC)	Southern Tasmanian Councils Authority (Same submission as HCC)
TasCOSS (to Act)	TasCOSS (to Plan)
Tasmanian Farmers and Graziers Association	
Tasmanian Minerals, Manufacturing and Energy Council	
Tasmanian Way	Tasmanian Way
TasNetworks (to Act)	TasNetworks (to Plan)
The Good Car Co	The Good Car Company
The Wilderness Society Tasmania	
University of Tasmania	University of Tasmania
UTAS Student Environ. and Animal Law Society	
Veterinarians for Climate Action	
Wine Tasmania	
WWF Australia	

Submission Themes: Threats, Principles, End Users, Sectoral Targets

1. The Threat of Climate Change/ Climate Science

There was strong concern conveyed about the threat posed by unmitigated global warming across the submissions. Health, environmental and social justice organisations, scientific research outfits, and local governments conveyed the strongest expressions of concern. For example, the Tasmanian AMA said, "Global emissions are the sum of all emissions and all emissions have to fall to have a chance of avoiding imminent disastrous tipping points, if we still can". Similarly, WWF said "Tasmania is highly exposed to potential climate impacts in terms of extreme weather, especially more intense bushfires and droughts". Smaller, localised organisations also deployed specific concerns, for example, the Action for Climate North West Tasmania said, "Longer and more intense fire seasons are frankly terrifying". Multiple other organisations used the terms "Climate Crisis", "Climate Emergency", "Accelerated Global Heating" (eg TASCOSS) to frame the threat. CSIRO-Tasmania said, "Tasmania is already (highly) exposed to climate impacts from fire, coastal erosion, heatwaves (on land and in the ocean), species migrations, drought, floods, and dust storms", as well as a range of social and economic effects. And the Hobart City Council said "Climate change is a wicked problem and a threat multiplier – it is estimated that natural disasters will cost Australia $39 billion annually by 2050".

Industry representatives held mixed concerns. For example, Wine Tasmania said, "Continuing human-induced carbon emissions present a significant risk to the future viability of the Tasmanian wine sector"; while Private Forests Tasmania said that government policies should give "due regard to climate change implications". Others however, conveyed concern that emissions reduction policies, rather than climate impacts, threatened the interests of their members. For example, the Tasmanian Minerals, Manufacturing and Energy Council suggested that Tasmania should take a minimalist approach to emissions reductions because "When Tasmania's emissions are compared with the USA, Tasmania is approximately 0.000003% of the USA's emissions"; while the Cement Industry Federation repeatedly explained that mandatory steps in Tasmania to reduce emissions would destroy the competitiveness of the local cement industry.

Tasmania's provincial councils were overwhelmingly concerned about how unavoidable climate change will impact on their local community and how the state government can help their respective communities and businesses adapt (mitigation issues were a distance second order priority). For example, Break O'Day Council asked for "more planning, technical and financial support for local communities"; Brighton Council asked for assistance with information about climate impacts (eg "Regular and localised climate change impacts information to assist local government to identify and communicate with the community on key risks, whether it be flooding, heatwave, cold snaps, bushfire, or storm damage projections") as well as assistance with building internal council capacity to respond to and manage the risks, "clear and consistent planning scheme requirements that remain ahead of the challenges", and help to build natural defences in

council jurisdictions "for example, the revegetation of stormwater systems, tree planting programs, better management, and ecological restoration of areas of Crown Land and State Growth controlled land". The Hobart City Council had more of a migration focus, but still prioritised adaptation.

2. Principles/Approaches

There were four major approaches/ principles in the submissions: disclosure, leadership, mainstreaming, and intergenerational equity (and 'vision' to a lesser extent).

Disclosure to climate risk attracted widespread support between industry, councils, civil society organisations. For example, the Cement Industry Federation asserted that "The Tasmanian government has a responsibility to the community, as well as to the businesses and services that support their livelihoods, to systematically assess and disclose the main risks associated with projected climate change". Hydro Tasmania stated that it 'supports climate related risk disclosure and would encourage the Tasmanian government to complete periodic risk and opportunity assessments across the State economy using a globally recognised framework such as TCFD'. Similarly, TasNetworks said "Meaningful, tangible information about the main risks associated with projected climate change is critical to preparing government, communities, businesses and industries for the future". Similarly, the Hobart City Council said, "it is critical that the Tasmanian government systematically assesses and discloses risks associated with projected climate change along with local and regional science and information", while LGAT said climate risk disclosure is "very important" and that "The Tasmanian Government must lead as a trusted source of hazard information, with a duty of care and responsibility for the wellbeing of all Tasmanians". WWF said that "It is vital that the Government periodically assess and disclose the key risks associated with climate change".

Leadership by the Tasmanian government attracted a wide coalition of support as well. Climate Tasmanian urged the state government "to play a leading role in providing authoritative information and making it available and accessible to the public" and "to provide leadership in positioning Tasmania's actions as at the leading edge of coordinated global response informed by science in tackling the challenges of climate change". Hobart City Council repeatedly identified Tasmanian government leadership as of "critical importance". Similarly, LGAT said that "leadership from the Tasmanian Government is essential in influencing the policy process, enhancing connectivity across sectors, and the capacity of society in responding to climate change effectively". Wine Tasmania "encouraged the Tasmanian Government, in partnership with the broader community, to take an ambitious and leadership position on reducing emissions, including through the Climate Change Act and Climate Action Plan". TasNetworks explained that Tasmanian government leadership "in relation to emissions reduction is of key importance in the face of climate change" and ultimately "The State Government should seek to position Tasmania as an international leader in emissions reduction and clean, low cost, reliable energy". The CSIRO

said that "Tasmania can play a unique leadership role – and the new Climate Action Plan provides the opportunity to support the delivery of this role through articulation of a shared vision for government and community". The Cement Industry Federation presented an alternative leadership narrative by calling on "the Tasmanian government to provide leadership in seeking alignment between all State and Federal Government approaches to climate change policy". Vision – which presupposes leadership – was raised by a few organisations including the CSIRO. Their view was that "Identifying a vision for the future can then help identify key steps or milestones along a pathway of actions towards that future, and so help in setting smart, measurable, achievable targets. These targets, in turn, would be supported by a system of measures, reporting and indicators".

Mainstreaming was described in several submissions particularly by civil society actors as of high importance – while not using the term "mainstreaming" itself. For example, Environmental Defenders Tasmanian said that "In order to be effective, targets must be supported by key mechanisms in law that mandate a 'whole-of-government' approach to climate change mitigation in a clear and coordinated way. Any climate change legislation should also include a coordinated approach to climate change adaptation". Bicycle Network Australia also called for "'a whole-of-government' approach to reducing climate emissions", with a focus on "increased cycleway infrastructure spending and the establishment of a standing active transport infrastructure fund". Using different language, TasCoss argued "for the principle of 'integrated decision-making' to be enshrined as one of the guiding principles of the Act. We therefore agree that a new section be inserted in the Act stating that Tasmanian Government agencies should consider the target, objects and proposed principles of the Act in relation to relevant decisions." Different again, The Tasmanian Way opposed "siloed" responses to climate change, arguing instead for government to develop "cross sectoral goals and targets, as well as action from businesses, industry, councils and community leading the transition". Climate Tasmania asserted that "'All major Government decisions' should include 'consideration of climate change', both the impact of the proposed change on emissions, and the impact of the changing climate on the facilities or systems subject to the decisions". The strongest response was from the AMA that argued that "'every aspect of government' would be obliged to consider and disclose climate change risks and plan for mitigation and adaptation in 'all decision making at every level, in every portfolio' and that 'all Government decisions' that do not adequately reflect the seriousness of the climate challenges ahead are, and should be, open to future litigation for failure to protect Tasmanians".

Intergrnerational equity was of deep concern to health and social justice organisations. For example, the Tasmanian Commissioner for Young People and Children, a statutory body, said that "I strongly recommend that the Act incorporate principles acknowledging the relationship between climate change, children's rights and wellbeing. This would ensure that all government decision-making processes and outcomes relating to climate change and the environment are consistent with the best interests of children and future generations". Doctors for the Environment urged similarly, for example, "a provision should be made to include marginalised voices and the

opinion of future generations. To ensure that legislation does not impinge upon the right to health of future generations." TasCoss raised concern about intergenerational equity as well as localised climate and energy inequity, for example, "we remain concerned that the Act fails to adequately incorporate a human-rights based approach, and in particular a clear focus on social and intergenerational equity in all approaches to climate change policy, mitigation, and adaptation. We continue to recommend that the Act include a set of guiding principles modelled on the Victorian Climate Change Act 2017 that include specific reference to the principle of equity, both current and intergenerational'. Action for Climate North West Tasmania focused on the latter equity concern: "Knowing that climate change will affect low income households and disadvantaged communities disproportionately is of great concern".

3. End User Opportunities and Discussions

The key sectors identified in the submissions as key to achieving Tasmania's full emissions reduction potential were: Transport, Agriculture and Forestry/LULUFC, Industry, Energy, Heath and Community.

- *Transport*

Most of the submissions identify reducing emissions in Tasmania's transport sector – via EV uptake, zero emissions transport, and or active transport – as a key opportunity (eg, Hydro, TasNetworks, AMA, Clean Energy Council, Launceston Chamber of Commerce, Action for Climate North West Tasmania, Bicycle Network is Australia, Good Car Company, ClimateWorks, WWF, HCC, Doctors for the Environment, among many others). Rationale for speeding up electrification of transport, beyond emissions reductions included: The transport sector is well-suited to state-based policies and incentives to drive abatement given the jurisdictional responsibility state governments have over land transport infrastructure and regulation (AMA); mitigates the risk of supply interruption of fossil fuels (AMA); the abundance of zero emissions electricity (Hydro, TasNetworks, Clean Energy Council, Climate Works); reduced air and noise pollution and benefits for city liveability and experience, as well as long term health benefits (Launceston Chamber of Commerce, Doctors for the Environment, TasNetworks); EV's are cheaper to run than ICE engines (TasNewtorks).

Electric Vehicle expansion was the focus on most submissions in their transport discussion. Policy suggestions to increase EV supply and achieve emission reductions, included the continuation and acceleration of the transition to electric fleets by both government and other big purchasers such as hire car businesses (Good Car Company, AMA); legislated targets (ie EV sales) should be implemented (Good Car Company, AMA, WWF); upgrade, completion (ie Dover), and expansion (ie multiple chargers in Campbelltown) of state-wide fast-charging network and infrastructure (TasNetworks, Good Car Company, BP Dover, WWF); education "Simply showing people that Electric vehicles are not 'gutless' has an impact" (BP Dover); 2-year rego execution for ALL EV

purchases (Good Car Company); exemption of stamp duty and means-tested interest-free loans (Good Car Company); establish vehicle emissions standards (WWF).

Active Transport – cycling (commuting), e-bikes, walking, and associated infrastructure – opportunities also featured heavily in the submissions (eg. most of the above submissions). Policy suggestions included: reallocating road space towards walking, cycling and public transport (Doctors for the Environment) or quarantining a portion of roads funding to support the uptake of active transport (Good Car Company). Bicycle Network is Australia presented the most comprehensive rationale and policy suite for expanding active transport in Tasmania. Centrally, their view is that "electric car uptake will take decades to replace petrol engines, which is time we don't have. We need people to get out of cars in the next five years, and electric bikes and electric cargo bikes are one of the most efficient ways of doing this" as they overcome a lot of the prohibitive factors to riding for transport (eg. terrain, fitness). To achieve this, end-of-trip facilities are required; governments can build separated cycleways that are suitable for all ages and abilities; government could offer a no-interest loan, similar to the Tasmanian Energy Efficiency Loans, or direct grants to help Tasmanians buy an e-bike for transport.

- *Agriculture/ LULUCF*

Invest in R&D was one of the top policy suggestions to reduce emissions in the agriculture sector (eg. Farmers for Climate Action, Tasmanian Farmers and Graziers Association, AMA, Doctors for the Environment). A strong and consistent example of an R&D need was technologies to reduce methane emissions in the livestock industry. The key suggestion was the development and commercialisation of seaweeds, particularly Asparagopsis, as a feedstock (eg Farmers for Climate Action, AMA), and carbon sink (AMA). R&D into pasture species, such as gene edited ryegrasses, to methane emissions, given its high energy/low fibre content, was also mentioned (Tasmanian Farmers and Graziers Association).

Change on-farm practices was another key policy suggestion. For example, through education programs to improve management of irrigation and fertiliser use (eg Action For Climate North West Tasmania); 'encourage environmental stewardship' by providing financial benefits such as subsidies or tax-right offs to those that incorporate adaptive technologies (e.g. more efficient on farm machinery, solar power, wind power etc.) (Tasmanian Farmers and Graziers Association); and by encouraging 'regenerative agricultural practices' through a combination of regulation and incentives to contribute to the sequestration of carbon in soils and biodiversity corridors within the rural landscape (Doctors for the Environment; AMA) and the reintegration of trees on farms (Private Forests Tasmania).

There was widespread criticism of the Tasmanian Government's LULUCF accounting. For example, the Australia Institute said that "accounting of greenhouse gas emissions with the inclusion of LULUCF is widely considered unreliable and easily manipulated". Most others developed this

argument into a critique of Tasmania's net-zero claim and the use of carbon credits. For example, the AMA said that "One issue that needs to be addressed is to stop talking about 'net zero' using LULUFC counting. This can make it sound as if we have done all we need to do because we are already there, but it is an accounting trick based on recovering from earlier extensive carbon loss by the clearing of native forest". Similarly, The Good Car Company said that "We recognise that Tasmania's current "Net Zero" Status is only due to large reductions in Native forest logging. In order to maintain this, we recommend that the carbon storage role of the States Native Forests and world heritage areas be solidified". Doctors for the Environment said that "we echo the concerns of others that this reputation of climate leadership is based almost exclusively on a reliance on land-based carbon credits related to carbon sequestration in forests that were historically heavily logged".

Developing a slightly different argument, Environmental Defenders explained that LULUCF accounting masked the lack of emissions reductions in other sectors, for example, "While Tasmania is in an enviable position of claiming to have already achieved net zero emissions, the emissions reduction attributable to LULUCF to date has camouflaged a lack of significant action in other sectors, where no marked progress in emissions reductions have been achieved". Similarly, Doctors for the Environmental Doctors explained that "Tasmania is in the enviable position of claiming carbon neutral or climate positive status. However, heavy reliance on land-based carbon credits has masked a lack of progress in reducing greenhouse gas emissions within the major emitting sectors of the Tasmanian economy". Based on this, several submissions recommended to "Separate LULUCF emissions from other sectors", for example Doctors for the Environment said "LULUCF emissions should be treated separately".

TWWHA-focused advocacy organisations argued that logging of Tasmania's native forest should immediately stop because it has no social licence, and the forestry industry can earn more money from carbon farming. For example, The Wilderness Society explained that "There is no longer an economic, social or moral case to continue logging High Conservation Value native forests, especially if Tasmania is serious about being a 'climate leader'…. Sustainable Timber Tasmania could realistically expect to earn more from carbon farming the State's public forests than from logging them for a loss." Action for Climate North West Tasmania argued to "Make our goal to transition the forest logging industry out of native forests and into becoming a 100% plantation forestry state prior to 2030….Sustainably manage our current plantations in order to take advantage of carbon and biodiversity benefits and ceasing the logging of old growth forest is at the top of the list." The Tasmanian Way argued similarly, but with a broader application and distinct restoration flavour: "protect and restore our carbon sinks (forests, soils, wetlands, seagrass beds - our natural systems that sequester carbon such as through protections, sustainable and regenerative approaches to agriculture and land use as well as restoring damaged ecosystems)".

By contrast, Private Forest Tasmania argue that 'the LULUFC sector makes a key contribution to Tasmania's emissions profile and forestry (and forest products) is a key industry in that sector'

though direct sequestration, storing carbon in wood products, as a substitute high emissions metals, and fossil fuel replacement. And these areas need to be expanded.

- *Industry and Energy*

Opportunities to reduce industrial emissions tended to focus on the need to attract new investment and industry into the state, particularly renewable hydrogen. For example, first, in general, Tasmanian should continue to provide bold early signalling about its intentions to provide a clean investment destination for long lived assets (Clean Energy Council), emissions intensive industries who are seeking low-carbon, low emissions opportunities to reduce their carbon footprint and costs including data centres, manufacturing and mineral processing (TasNetworks); and become the global hub for all things renewable including developing the most efficient water turbines, wave generators, hydrogen, bio methane and so on (Tasmanian Minerals, Manufacturing and Energy Councl). Specific major opportunities to attract new low pollution development and industries include investing in Tasmania's transmission capacity now including Marinus Link and the supporting North West Transmission Developments (Tas Networks); establishing a Guarantee of Origin/certification scheme for green hydrogen (Hydro); and delivering targeted competitive-based reforms – by way of 'grants, access to public land, subsidised energy, specialist expertise and coordination, reduced regulatory burden incentives for Tasmanian businesses' – to implement projects to reduce carbon emissions, and for national and global companies to set up local trials to prove new technologies to reduce carbon emissions in their industry (Cement, Concrete, and Aggregates Australia).

Second, drawing on its renewable energy assets, Tasmania should continue to push for a Renewable Energy Industrial Precinct in Bell Bay (Climate Works; WWF); and renewable hydrogen facility (Clean Energy Council, TasNetworks; Tasmanian Minerals, Manufacturing and Energy Council).

Third, establishing a renewable hydrogen facility would assist to reduce emissions in traditionally 'hard to abate' industrial manufacturing processes (Clean Energy Council), fossil fuel sectors, including transportation and heavy industry (TasNetworks), industries such as cement manufacturing and Tasmania's bus/train/truck fleets (Tasmanian Minerals, Manufacturing and Energy Council), and shipping (bunker fuels) (WWF).

Alternative energy solutions include exploring and backing new industries with more long term jobs like plastics recycling or production of small scale wind, solar and hydro generators along with microgrid development ('which makes the need for cables obsolete in the foreseeable future and reduces the risk of stranded assets such as the Marinus cable')(AMA); strategies to improve thermal efficiency of homes will translate into improved health outcomes for residents (Doctors for the Environment; Climate Works).

- *Health and Community*

Heath concerns involved infrastructure keeping up with increasing numbers of climate refugees, along with health and particularly mental health services; and the need to develop a systemic and integrated approach to climate, health and emergency services.

CSIRO mentioned the need to 'engage in climate conversations' about adaptation and mitigation challenges and opportunities with communities; while TasNetworks and others such as the Tasmanian Way talked about the need for relevant climate and energy skills and workforce development to facilitate the transition to a low carbon economy.

4. Table 2: Support for Sectoral Emissions Reduction and Adaptation Targets and Approaches

The takeaway message here is that the submissions overwhelmingly support a sector-based approach to emissions reductions in Tasmania.

Organisation	Target Strength and Discussion
Strong Support for Legislated Sectoral Targets	
University of Tasmania	"This submission argues that Tasmania's climate action strategy must include more ambitious sectoral emissions reduction targets and comprehensive, sector-specific climate adaptation strategies to build our reputation as a resilient, competitive and prosperous climate-positive economy." Specifically, the next iteration of the Tasmanian Climate Change Act should: • Establish sectoral emissions reduction targets for energy, transport, agriculture, industry and waste. Reflecting international best practice, the target should be a 50% reduction in sectoral emissions by 2030 from a 2005 baseline. • Establish sectoral, or 'systems', adaptation plans/targets for heath and emergency management, ecosystems and habitat, agriculture and aquaculture, the built environment and transport, and education. Sector targets should reflect the latest scientific knowledge on likely climate impact scenarios for each sector.
Doctors for the Environment	"The capacity for each major sector, including agriculture, energy (non-transport), industrial processes and transport to urgently reduce emissions will vary. However, we argue that uniform sector-based targets will reflect the required urgency and stimulate the necessary research and innovation

	to place each sector on a genuine lower emissions trajectory….The new Act should contain a target of 50% reduction in emissions on 2005 levels across all sectors by 2030. This should be coupled with annual monitoring and reporting and reviews of progress every five years."
Australian Medical Association – Tasmania	"Carbon emission reduction targets need to be set in legislation for all sectors to be taken seriously by government and business and to give certainty about the future direction expected to be taken by government and business…. Specific targets are essential for meaningful impact. Target sectors include transport, health, construction, mining, forestry, agriculture and aquaculture and public buildings…We believe that government decision making should be guided by the overwhelming scientific evidence about climate change and the need to reduce carbon emissions in the health sector by 80% by 2030."
Support for Legislated Sectoral Targets	
The Australia Institute	"To avoid unreliable and easily manipulated LULUCF data, Tasmania's Climate Act should include a legislated net-zero 2035 target, underpinned by 5-yearly interim targets, and sector targets….Individual, sectoral emissions targets allow for clear and transparent monitoring of decarbonisation efforts outside the forestry sector. Good, legislated examples of sectoral emissions targets exist in other states and territories in Australia."
Brighton Council	"To drive emission reductions across the economy, Tasmanian emission targets should become more ambitious over time and align with the latest science. Legislative obligations are one of the most effective means to drive change. Additional interim and sectoral targets are the best way of driving targeted change and acknowledge the relative opportunities of transport versus industry versus waste."
Hobart City Council	"Overall, there is support for the setting of and/or legislation for emissions reduction targets from identified carbon intensive sectors. This is a recognised and effective way to drive emissions reductions over time enabling transparency, scalability as technology and capacity increases."
Southern Tasmanian Councils Authority	"Overall, there is support for the setting of and/or legislation for emissions reduction targets from identified carbon intensive sectors. This is a recognised and effective way to drive emissions reductions over time enabling transparency, scalability as technology and capacity increases."

Climate Tasmania	"All sectors should have detailed analysis and development of targets (including interim targets). This is necessary so that trade-offs can be made between sectors where higher targets are achievable early compared with hard to abate sectors while keeping within an overall emissions reduction trajectory. The co-benefits of emissions reductions in specific sectors are described in the section on sectoral targets."
Environment Defenders Office	Because of LULUCF "camouflage", "there is a need for the Act to provide sectoral emissions reduction targets to ensure that Tasmania is not at risk of failing to meet its overarching net zero target. To this end, EDO supports the approach taken in Victoria and the ACT of setting carbon budgets for government departments to report against, whilst inviting non-government entities to pledge to adhere to those budgets. We recommend that the Act be amended to require Ministers to set and report against sectoral targets based on independent expert advice informed by the best available science and principles of ESD." "We also recommend that the Act be amended to require a Tasmania-wide Adaptation Plan to be made, published, and periodically reviewed by the Minister on advice from the independent statutory climate change advisory body. Sectoral and regional adaptation plans should also be made by portfolio Ministers consistent with the jurisdictional adaptation plan."
TasNetworks	"The Act could also drive further decarbonisation via sector-specific target setting where appropriate, e.g. transport, agriculture, heavy industry. These sector-specific targets could be tailored to take account of the unique challenges facing each industry in a changing climate, balancing the need for emissions reduction against economic sustainability. Such targets would allow for focus with clear accountabilities. Taking the transport sector as an example, the Act could mandate for Electric Vehicle adoption and uptake i.e. 100% clean-energy fuelled public transport by 2050, including 100% of government fleets fuelled by clean energy sources by 2050"
Launceston Chamber of Commerce	"We note that Tasmania's status as a low carbon jurisdiction is primarily the result of hydro development in the 20th century and our system of reserved land. Now we must look to legislated carbon reduction targets in individual sectors, particularly transport and agriculture as well as greater efficiency from industry and domestic users to really drive our carbon transition."

TACOSS	"We recommend that these targets be: By 2050, zero-net-emissions status in all three areas of Tasmania's energy sector: electricity generation, direct combustion, and transport, with five-yearly interim targets and a five-yearly review to keep Tasmania on track to meeting this target. For example, Australia-wide, in order to reach zero net emissions in the road transport sector by 2050, a reduction in road transport emissions of 11% will be necessary by 2030."
UTAS Student Environment and Animal Law Society	"SEALS submits that the Tasmanian Government should enact sectoral interim targets for all sectors contributing to greenhouse gas emissions in Tasmania, with incentives and enforcement action for high emission sectors. This will assist Tasmania reaching a legislated target of carbon neutrality for all sectors of the economy by 2050."
Support for Sectoral Non-binding Targets, Pledges or Approaches	
Good Car Company	"As a principle we support sectoral targets. These allow the Government to target reductions in "easy", as well as "hard-to-mitigate" sectors. We are in full support of time bound targets with short, medium and long term aspirations. These ensure that short term policy support and funding match the long term targets…The transport sector has the most achievable emissions win after electricity generation. We recommend an aggressive target in this area. Going hard on transport can take some pressure off hard to address sectors such as concrete and aluminium production."
Local Government Association	"While whole-of-state targets are important, targets for specific sectors that indicate where we can effect change, and assist in tracking/ monitoring progress, are more effective in driving behaviour change. The focus should be on high level sectors, such as agriculture, waste, transport, energy. Targets need to be evidence-based so fair and not disproportionate….We propose that the Act require the Government to set science-based targets to drive decarbonisation of the Tasmanian economy, including interim targets and targets for specific sectors. Sector specific targets are best placed in Regulations to provide for flexibility." "While the Act addresses climate change adaptation through its objectives, there is no specific responsibility or targets, regulations or reporting requirements outlined. These omissions must be addressed if we are to meaningfully respond to a changing climate."
The Wilderness Society	"For the island to be a true climate leader, it could aim to get energy, agriculture and industrial emissions to true zero emissions, which unlike

	most other jurisdictions, is feasible. This ambitious target would not just set the island above and beyond, it would honour brand Tasmania like nothing else."
Wine Tasmania	"Targets - high level and interim - should also be set in partnership with key sectors, who own responsibility for their own emissions."
The Tasmanian Way	"The State Government should: set ambitious, realistic and measurable targets to reduce emissions to zero across all sectors and to include incremental targets to help track our progress."
Clean Energy Council	"It should also be noted that not only will Tasmania's clean energy advantage help it to achieve decarbonisation targets for transport and industry, but it will also accelerate the growth of the renewable energy sector itself, by increasing demand for clean electricity, which can in turn promote further investment and job creation."
World Wildlife Fund	"To strengthen the track towards net zero, there is demonstrable value in setting targets and ambition for specific sectors. Sectoral targets can drive policies and programs that both accelerate the adoption of sector relevant zero-emission technologies, reduce emissions and deliver co-benefits relevant to that sector. Such sectoral targets can be (regularly) assessed against progress on mitigating climate change, building resilience to manage remaining risks and on economic indicators." "By extending the state's focus on emissions reduction targets in transport and low-emissions manufacturing, Tasmania can further complement its renewable energy powerhouse ambitions. Given the state's economic reliance and reputation for a clean natural environment that supports agriculture and tourism activities, WWF-Australia is also supportive of sectoral targets for these industries….New sector targets for manufacturing and transport would benefit Tasmania and leverage the significant overlap and mutual interaction with energy and emissions reduction potential."
ClimateWorks	"Sectoral emissions pledges would maintain focus on all of Tasmania's emissions sources…Sectoral emissions pledges could be made for Industrial Processes and Product Use, Waste, Transport, Agriculture, LULUCF and Stationary Energy Use (Other than Electricity). Making these pledges, accompanied by action plans, will also ensure these sectors capture the opportunities, and mitigate the risks, of the transition as referred to in response to Question 11."

Hydro Tasmania	"Hydro Tasmania's recommendations include: The merit in considering non-binding sectoral emissions reduction targets…It is timely to consider the appropriateness of setting non-binding targets for some sectors; this could include non-binding interim targets….These targets could also be updated on a five year rolling basis (i.e. in line with the review of the Act). Sectoral targets make sense where there is a clear opportunity to switch to electrification (i.e. having less reliance on imported fossil fuels), where the change to electrification wouldn't increase emissions profiles. There is also opportunity in sectors where there is clear alignment to Tasmania's low emissions advantage. A transport sector target is a practical target, and possibly a liquid hydrocarbon fuel replacement target…Hydro Tasmania suggests that the updated Climate Action Plan includes an action to consult with selected industries with the aim of developing sectoral emission reduction targets, and associated interim targets, by 2024. Setting sectoral emissions reductions targets can maintain Tasmania's leading position and can seek to protect Tasmanian industries against the risk of future international carbon tariffs."
Farmers for Climate Action	"Farmers for Climate Action recommends that in addition to maintaining emissions below zero, Tasmania sets sectoral roadmaps for achieving net zero. This would include a roadmap for Tasmanian Agriculture transitioning to net zero by 2030. Farmers for Climate Action urges the following two core areas be woven into a sectoral emissions reduction plan for agriculture: a. Investment in research, development and extension (RD&E) to reduce livestock emissions; b. Develop a carbon sequestration program that encourages Tasmania's farmers to try to build soil carbon, increase biodiversity and offset remaining livestock emissions." "Farmers for Climate Action recommends that sectoral adaptation plans be developed to assist communities and sectors to adequately prepare for the dramatic changes that are set to occur. Farmers for Climate Action recommends that the Tasmanian Government adopts a similar system to the Victorian Government, requiring ministers to develop and report on their sector every 5 years. This would provide greater certainty for communities and sectors to deal with the risks as they arise and be prepared to respond accordingly."
Veterinarians for Climate Action	"Since the knowledge of each sector resides within the sector, they should be required to manage their own emission reductions, and develop their own plan and targets. Since this requirement will be novel for most sectors, setting specific greenhouse gas reduction targets initially is

	probably not advisable. It may create resentment and slow progress. It would be a better start to require each sector to present a comprehensive and workable plan to the government within a six-month deadline. In the first instance, the Minister for the specific sector must have the responsibility for establishing a working group to develop the plan. The working group needs to include all those with a good working knowledge and involvement in the sector. These plans must detail how the sector proposes to reduce greenhouse gas emissions by 60% by 2040 in line with the State target. Individual risk assessments, interim targets and opportunities must be included. The requirement for individual sectors to develop plans should be written into a Regulation."
Tasmanian Farmers and Graziers Association	The agricultural industry in Tasmania has already reduced its greenhouse gas emissions by 8.3% since 1990, therefore the TFGA believes that it may be a worthy endeavour to separate industry targets in an effort to clarify efforts made in each sector. Other sectors that may be struggling to manage emission targets should not be allowed to "drag the chain" and negatively effect those that are actively adapting to the changing climate….This being said, the Act needs to consider targets as resembling "aspiration goals", rather than as becoming mandated obligations…Our members are concerned that if mandated targets are set and they are beyond reasonable means of attainment, that this would be counterproductive to efficiency, productivity and sustainability."
CSIRO	"The interconnected nature of climate and Tasmania's economic system means that integrated approaches to both mitigation and adaptation should be considered. In the context of Tasmania's greenhouse gas emissions profile, CSIRO suggests that focusing action in each of the major emitting sectors (energy, industrial processes, agriculture, waste and transport) could achieve substantial reductions. Failure to achieve progress in any single sector will likely make it more challenging to meet long term emissions reduction targets."
Australian Energy Council	"To support transport electrification, the AEC would not oppose the Tasmanian Government setting interim emissions reduction targets for the transport sector as a way to create policy certainty and encourage private investment."

Very Reluctant to Support Sectoral Targets or Approaches	
Cement, Concrete, and Aggregates Aust	"CCAA does not support sector-based targets as these can often distort the market…Sector based mitigation and abatement strategies backed by government regulatory settings and incentives are likely to be more effective than targets. Most sectors have developed or are developing sector-based roadmaps that embrace the adoption of new technologies and innovation to drive decarbonisation. The Act should recognise these and support the acceleration of these via supportive policy and incentives…If arbitrary targets are set on specific industry sectors without incentives and assistance to achieve those targets, it is likely that industries will continue to operate unchanged and the target will be met with carbon offsets. The offsets may stimulate industries in other countries to generate temporary carbon credits, but the industry will not be encouraged to innovate to reduce emissions and the additional cost will be passed onto the consumer."
Cement Industry Federation	"As discussed above (Item 3.4) – sector-based targets are not supported. Sector based targets applied at the jurisdictional rather than national level would impact on the competitiveness of key industries such as cement manufacturing that compete nationally as well as with imported material and are not supported….Instead of legislating targets the Act should recognise existing sector-based approaches to reducing emissions and provide a framework for the development of supportive policies and incentives. This could be achieved through targeted consultation with key sectors aimed at identifying existing and potential future emission reduction pathways (e.g., as per existing or planned sector roadmaps)."
Tasmanian Minerals, Manufacturing and Energy Councl	"TMEC is not supportive of setting sectoral targets. This is a blunt instrument and assumes the level of improvement to date has been the same between sectors and even by different businesses within the same sector, when we know that is not the case….As pathways to lower emissions become technically possible and commercially viable, then it would be prudent for those changes to be applied. Some sectors may have a much lower cost pathway than others and therefore to arbitrarily place targets on sectors over-simplifies the reality of how climate change targets are not considered entirely independent of any other consideration. Any proposal to apply sector wide targets will undoubtedly have adverse consequences which may drive higher emissions in another sector or another jurisdiction."

Private Forests Tasmania	"Targets for specific sectors would not be helpful. Emissions from specific sectors can rise and fall from year to year depending on markets and other factors out of control of the industries and businesses operating in those sectors. Legislated sector targets would place undue pressure on certain sectors leading to an uneven playing field and likely result in perverse outcomes."