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Climate Change Act Review 2024-25 | c-/ Era Advisory
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Dear reviewers,

Thank you for the opportunity to make a submission to the Independent Review of the Tasmanian *Climate Change (State Action) Act 2008*. As the Greens' spokesperson and a former Minister for Climate Change, I am responding on behalf of the Tasmanian Greens.

We are concerned the Act, as currently written, is failing to meet the enormous challenges of the times. It is not delivering emissions reductions or adaptation planning at a governmental, business or community level. Substantial amendments are required.

Given the scientific reality of accelerating global heating and the threat this poses to Tasmanian communities, the environment and economy, we trust – this time – government will take seriously its moral responsibility and its obligations under the Act to drive genuine emissions reduction and adaptation planning.

As it stands, the Tasmanian Government is in breach of Object (b) of the Act in that it has not taken any action to significantly 'reduce Tasmania's greenhouse gas emissions.'

The case for greater commitment and a strengthened *Climate Change (State Action) Act 2008* is becoming increasingly urgent.

Background

Global heating is already impacting on Tasmanians, the environment around us and the economy. To see the evidence of this, you don't have to look further than last summer, when masses of dead salmon polluted Tasmania's warming waters, and fires burned more than 100,000 hectares of the north-west wilderness.

Similar devastating fires scorched the island in 2016 and 2019, threatening regional communities and burning ancient Gondwanan landscapes in the Tasmanian Wilderness World Heritage Area. Many of these areas, unadapted as they are to fire, will never recover.

Despite this threat, there is – for example – no evacuation plan for Nipaluna/Hobart, which is the capital city most at risk from bushfires in the country. This is a failure of adaptation planning that must be addressed.

[Tasmania's Risk Assessment for Climate Change](#), released last year, made it clear the climate is changing rapidly. It presented a confronting picture of worsening risks from extreme heat, dry conditions, bushfires, floods, storm surges, sea level rise and coastal erosion.

We're clearly already in the climate emergency that world-leading Tasmanian scientists have warned of for decades. Tasmanians have been very clear: they want their government to act on climate now to protect current and future generations.

Forest Carbon

While the Tasmanian Forest Agreement led to substantial emissions reduction from 2012 onwards, progress has otherwise stalled.

The government's own [Greenhouse Gas Emissions Report](#) shows that emissions continue to rise across all sectors of the economy.

It is also clear native forests are doing the heavy lifting to allow the State to claim net-zero status, but a scientific report released this week, '[Tasmania's Forest Carbon 2025 update](#)', confirms a 2022 finding that native forest logging is the highest emitting sector in the State, generating two and a half times the emissions of the entire transport sector.

The report finds ending native forest logging and burning is the fastest, most effective way to substantially reduce carbon emissions. Forests that today draw down an estimated 22 million tonnes of CO₂e each year, could if government changes its policy, sequester an extra 75 million tonnes of CO₂e by 2050.

Further risks to emissions reduction are posed by federal and state government policy which encourages, and subsidises, the burning of native forests for energy which is being greenwashed as renewable. It's not, and it's a potential disaster not only for the climate but also for Tasmania's lucrative clean, green brand.

A government that is serious about emissions' reduction would end native forest logging in Tasmania.

Recommendations

To enable the State to mitigate and adapt to climate change effectively, the *Climate Change (State Action) Act 2008* needs a substantial overhaul. The Greens have a number of recommendations for improvement, including:

1. Ensuring the Act is administered under a specific climate change portfolio with a Minister for Climate Change;
2. Introducing absolute and sectoral emissions reductions targets, backed by evidence and robust data;
3. Requiring an evidence-based, widely consulted and regularly reviewed Climate Change Adaptation Plan to be developed;
4. Ensuring a Climate Change Action Plan, Sectoral Emissions Reductions Plans and Statewide Risk Assessments are developed every three years;
5. Broader community consultation, including with the Tasmanian Aboriginal community;
6. Reinstating an independent, expert climate advisory body such as there was before amendments to the Act in 2014;
7. Enacting a Parliamentary Joint Standing Committee on Climate Mitigation and Adaptation;
8. Ensuring the Minister is accountable to Parliament, and therefore the Tasmanian people, for emissions reductions and adaptation planning, under the Act;
9. Requiring climate change to be incorporated into government decision-making; and
10. Introducing strong guiding principles for action.

Each recommendation is discussed in detail below.

A Minister for Climate Change

It remains self-defeating and highly regrettable that successive Liberal Premiers have decided not to appoint a Minister for Climate Change. The current set up snubs the reality and urgency of the times we live in and has allowed for lost focus on the need to drive action.

We encourage the Premier to address this deficiency.

Recommendation 1: The Premier acknowledge the moral and scientific reality and reinstate a dedicated ministry for climate change.

Emissions reductions targets

Tasmania's emissions have been net zero for more than a decade, thanks to a reduction in logging secured by the Labor-Green Government. However, the [Tasmanian Greenhouse Gas Emissions Report 2025](#) shows that our absolute emissions have also continued business as usual across all sectors for decades.

The Act's target of net zero emissions was already achieved when implemented, and has done nothing to reduce Tasmania's emissions since. Our target of net zero by 2030 may seem ambitious when compared to other jurisdictions, but without any emissions reductions, we're failing in our duty to mitigate climate change. It's not the climate action concerned Tasmanians have demanded and that their children and grandchildren deserve.

Introducing an absolute emissions reductions target would also help to safeguard the achievement of our net zero status by reducing our reliance on the land use, land-use change and forestry sector. Offsets from this sector will likely be reduced in the future, given the vulnerability of Tasmania's environment to climate change-related events such as bushfires.

An absolute emissions reductions target was recommended by the [Tasmanian Policy Exchange](#), in response to the 2021 Review.

Emissions reductions targets for each sector are necessary to reduce emissions. While some sectors will have more scope for timely emissions reductions, all sectors must be incorporated and supported by government to achieve outcomes. Without targets, Sectoral Emissions Reductions and Resilience Plans operate in a vacuum and will not deliver the emissions reductions needed across sectors to be part of the climate solution.

Emissions reductions targets for each sector were widely supported by community organisations during the 2021 Review, and were recommended by [Climate Tasmania](#), the [Tasmanian Independent Science Council](#), [Environmental Defenders Office](#) and the [Australia Institute](#).

Therefore, to achieve the objects of the Climate Change Act to reduce emissions, the Greens recommend the introduction of an absolute target for statewide emissions reduction and sectoral targets, alongside the net zero target. These

targets should be informed by independent advice from a reinstituted Climate Action Council and be declared by the Minister within 12 months.

Recommendation 2: Introduce requirements for absolute and sectoral emissions reductions targets into the Act.

Climate change adaptation plan

The Tasmanian people and environment are already suffering from the effects of climate change as confirmed by devastating climate-induced fires and floods in recent years. [Tasmania's Risk Assessment for Climate Change 2024](#) presented a worrying outlook for Tasmanians' future – where extreme heat, fires, dry conditions, floods, sea level rise, coastal erosion and storm surges would become the new abnormal, with impacts likely to intensify in the decades ahead.

The Risk Assessment identified urgent actions necessary to strengthen infrastructure, communities, the environment and food systems in the next five years. These include ruggedising health, emergency services and transport infrastructure, protecting our land and marine ecosystems, ensuring physical safety and wellbeing of communities, and improving food security through local networks.

The report should have been a wakeup call for the government that climate adaptation was needed now to keep Tasmanians and the environment safe, and minimise economic shocks. Yet the government, [in their response](#), made no commitments to any of the actions required.

It's clear a legislative requirement for effective adaptation planning is necessary to ensure sustained government action. This adaptation plan needs to be updated every three years, to take account of evolving science and Tasmanians' lived experience of climate impacts. Consultation with the community, including Tasmanian Aboriginal people, should be a requirement of the development of this plan.

Recommendation 3: Insert into the Climate Change Act a requirement for a Climate Change Adaptation Plan to be developed, and for a review of this Plan to be conducted every three years.

Requirements for plans to be developed every three years

Currently, the Climate Change Action Plan, Sectoral Emissions Reductions Plans and Statewide Risk Assessment only need to be developed every five years. Climate change is accelerating, and science and lived experience are evolving quickly. To prevent great loss and trauma in the future, the Tasmanian

Government's response needs to be similarly urgent. The Greens believe these plans need to be revised every three, instead of five, years.

Recommendation 4: Require in the Act that the Climate Change Action Plan, Sectoral Emissions Reductions Plans and Statewide Risk Assessment be developed every three, instead of five, years.

Community consultation

One of the objects of the Act is to support a consultative approach. It requires community consultation on the Climate Change Action Plan and Climate Change Act Reviews. However, the same community consultation requirement is not extended to the Sectoral Emissions Reductions and Resilience Plans or the Statewide Climate Change Risk Assessment.

The legislative, policy and practical response to global heating at the local level requires a social license and community buy-in to ensure it is effective and sustained.

The Greens recommend that consultation with the community be embedded throughout the Act. This should specifically include consultation with Tasmanian Aboriginal people, for whom there is not currently a requirement to consult under the Act and from whom there is much to be learned about resilience.

Recommendation 5: The Act needs to require community consultation in relation to all plans and assessments under the Act.

An Independent Advisory and Oversight Body

The Tasmanian Climate Action Council (TCAC) was established under the original Act to provide independent advice on climate change but was repealed by the newly elected Hodgman Government in 2014. Since then, there has been a lack of independent advice on climate change to government and Parliament, and consequentially decision making is less informed by the evidence.

Other jurisdictions, including the ACT, NSW, QLD and SA have independent bodies to advise government on effective climate mitigation and adaptation.

The Greens recommend re-establishing an independent, expert body to provide advice to decision makers. Such a body could provide advice on delivering the objects of the Act, informing an appropriate emissions reductions target and effective adaptation planning. Members of this body should have the relevant scientific, economic, environmental, social, public policy and/ or legal expertise related to climate change. There is no shortage of this expertise in Tasmania.

An independent body was widely supported by community organisations during the 2021 Review, including by [Climate Tasmania, the Independent Science Council](#), the [Australia Institute](#) and the [Tasmanian Policy Exchange](#).

Recommendation 6: An independent advisory and oversight body needs to be re-established under the Act.

A Joint Standing Committee

A Parliamentary Joint Standing Committee on Climate Mitigation and Adaptation, with broad political representation, would ensure a clearer and deeper understanding of the challenges and allow for a non-partisan response to a huge policy challenge which affects all Tasmanians.

A Joint Standing Committee was supported by a number of community organisations during the 2021 Review, including [Climate Tasmania, the Independent Science Council](#), the [Australia Institute](#) and the [Tasmanian Policy Exchange](#).

Recommendation 7: The Act needs to be amended to establish a Joint Standing Committee on Climate Mitigation and Adaptation.

Responsibility of the Minister for emissions reductions

A mechanism for accountability is an important addition to the Act, given the urgency of the challenges we face and historical lack of meaningful action.

The Greens recommend a requirement be inserted into the Act that, where an emissions reductions target is not met, the Minister must present a report to Parliament. This report should include why the targets were not met and action which is being undertaken address this and to meet other targets, including how the action taken is different from that which was taken on the target that was not met.

The [Tasmanian Policy Exchange](#) made this recommendation in the 2021 Review of the Act.

Recommendation 8: The Climate Change Act should make the Minister accountable on behalf of government for not achieving an emissions reductions target.

Factoring climate change into decision making

Incorporating climate change considerations across decision making is important to ensure legislation and policies do not exacerbate climate impacts. When climate change impacts are factored into government decision making, it can help reduce emissions and Tasmanians adapt to a rapidly changing climate, knowing government is acting responsibly.

The requirement for decision makers to consider climate change is legislated in the [Victorian Climate Change Act](#). This was a recommendation made in Tasmania's [2017](#) and [2021 Independent Reviews of the Climate Change Act](#), but was not acted on by government. The [Tasmanian Policy Exchange](#) also made this recommendation in their own 2021 Review of the Act.

Whilst the government has developed a [Government Climate Capability Framework](#) aimed at increasing the consideration of climate change in decision making, only a legislative requirement can achieve the urgent action Tasmanian and international scientists confirm is necessary.

Recommendation 9: Legislate a requirement for climate change to be incorporated into government decision making.

Guiding principles to inform climate action

Including 'guiding principles' under the Act will provide decision makers (those conferred power under the legislation) with guidance on how they can promote climate change mitigation and adaptation across decision making.

This was recommended by the [2017](#) and [2021 Independent Reviews of the Climate Change Act](#), but was not acted on by the Tasmanian government. General principles have been legislated in Victoria, under the [Victorian Climate Change Act](#).

Including guiding principles was widely supported by community organisations during the 2021 Review, including [Climate Tasmania](#), [the Tasmanian Independent Science Council](#), [Environmental Defenders Office](#), [The Australia Institute](#) and the [Tasmanian Policy Exchange](#)

The Greens recommend guiding principles be incorporated into the Act.

There needs to be an obligation on those conferred power under the legislation to exercise that power in a responsible manner which furthers the guiding principles.

Such principles could include:

- Recognition of First Nations' knowledge – Tasmanian Aboriginal people have a unique and ancient understanding of the landscape which must inform future climate action, particularly on adaptation;
- Protect – existing terrestrial and marine carbon stores, including forests, estuaries and wetlands;
- Risk management - policies need to address risks to life, property, infrastructure, the natural environment and the economy;
- No harm – policies should not increase emissions or exposure to climate impacts;
- Equity – Government action should promote equity for current and future generations, and consider vulnerable communities;
- Leadership and collaboration – In addition to collaborating on state, national and international efforts, Tasmania can be a leader on climate action and showcase how to reduce emissions and adapt to climate change in Australia and beyond;
- Science-based decision-making – Decisions should be made based on science and robust data;
- Community engagement – Communities need to feel and be part of the solution, empowered by knowledge, and trusting in government to look after their interests in a changing climate;
- Accountability – The outcomes of decisions to emissions and adaptation should be measured and reported in a timely, transparent and accurate manner; and
- Integrity in carbon accounting – Offsets and carbon credits should only be used where they would not otherwise be removed, and the sequestration of greenhouse gas emissions is permanent.

Recommendation 10: Designated decision makers within the Act should be required to consider guiding principles for climate action when making decisions..

Conclusion

The last review of the Act was overdue and took many years to complete. We trust this review will be approached more seriously in recognition of the times in which we live.

Emissions are continuing to increase and it is business as usual across sectors. Logging of Tasmania's precious carbon-storing native forests continues. There are no coherent, funded plans to help the Tasmanian people and environment adapt to a changing climate, or to mitigate climate shocks to our island economy.

The Act needs a major overhaul. It's almost twenty years since it was introduced and it is not delivering. This review is an opportunity for the Tasmania Government to step up and act on climate change with the urgency needed.

Tinkering around the edges of this Act will not deliver change. Business as usual is not an option. Tasmanian children and young people, particularly, are looking to their government and Parliament to take meaningful, sustained action so they can look forward to a safe climate future.

Yours sincerely,



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