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

29 January 2007

Dear Madam

### **Draft Climate Change Strategy for Tasmania**

We are pleased to make a submission on this important issue. Detailed comments on the content of the strategy follows, but we would first like to emphasize the following critically important issue that the Tasmanian Government must adopt if it is to take the issue of climate change seriously.

**A policy that will reduce Tasmania's greenhouse gas emissions, with clear and measurable actions, targets and timeframes must be developed and implemented as soon as possible.**

In the absence of such a policy, this climate change strategy is clearly sub-optimal.

### **Goals**

The most notable absence from the list of 5 goals is one to reduce greenhouse gas emissions. Referring to maintaining Tasmania's status as a low greenhouse gas emitter is not only a massive cop out, but factually incorrect. Tasmania's emissions are only low when compared to the rest of Australia. In a global context, Tasmania's emissions are unacceptably high and must be reduced.

We are also concerned about the setting as a goal opportunistic responses to climatic changes. Although it is probably inevitable that changes will occur, and that these changes will present opportunities for sections of the community, to set this as a goal of a strategy to deal with climate change is morally indefensible, particularly when there is no goal to actually reduce emissions.

We are supportive of the other 3 goals.

### **Guiding principles**

We are supportive of the guiding principles as expressed, in the context of our concerns with the goals.

### **Key initiatives**

In the context of the concerns already supported, we are extremely supportive of the 10 key initiatives.

#### **Objective 1: Coordinate Tasmania's input into climate change adaptation and mitigation strategies at national and local levels**

A critical absence from this objective is a policy to reduce greenhouse emissions, as previously referred to.

#### **Objective 2: Coordinate climate change adaptation strategies in Tasmania**

We are supportive of this objective.

#### **Objective 3: Promote sustainable urban development, which takes into account carbon/oil constraints and climate change implications**

We are highly supportive of this objective, particularly with regards to sustainable urban development. However, once again there is a failure to actual set targets and commit resources to reaching these targets

#### **Objective 4: Plan for the impacts of climate change on Tasmanian industry sectors**

The emphasis of this objective seems to be adaptation rather than prevention, which is unfortunate.

#### **Objective 5: Plan for the impacts of climate change on human health and safety**

We are supportive of this objective. We refer you to work undertaken by the Climate Action Network Australia, of which the TCT is a member, on this issue.

#### **Objective 6: Pursue economic opportunities from Tasmania's renewable energy system and continue to develop new renewable energy resources**

We are supportive of this objective. However, the issue of the importation coal-generated electricity has been ignored. It is our understanding that the combination of the drought and overly-optimistic modeling has created a situation where Tasmania is importing a significant amount of 'dirty' electricity via Basslink. This demands urgent investigation and clarification.

We are supportive of involvement in emissions trading, both within Tasmania and nationally. To facilitate this, Tasmania needs to develop a comprehensive and detailed carbon accounting database – just how much carbon is in the biosphere, how much is lost and how much is gained by each management action. Such a database must be supported detailed annual accounting, to be eventually included in resource accounting to parallel conventional financial accounting.

#### **Objective 7: Maintain Tasmania's status as a low greenhouse gas emitter by continuing to encourage the efficient use of energy by government, industry and the community**

Firstly, it is worth noting that Tasmania's status as a low greenhouse emitter is only in an Australian context, not an international one. Even then, this claim is not backed up by a robust data on Tasmanian greenhouse gas emissions. We believe that it is entirely inappropriate to adopt this description in the absence of such information and the lack of a emission reduction strategy.

We are supportive of further investigations of the viability of increasing the use of biofuels. It is our opinion that CNG (compressed natural gas) is the best biofuel product to aim for – easy to make,

transport and use at scales appropriate to Tasmania – but alcohol extracted from oil seed rape or canola as a diesel substitute is also likely to be worthwhile. Although not specifically mentioned we would be opposed to the harvesting of native forest specifically for the purpose of biofuel production.

**Objective 8: Maintain Tasmania’s status as a low greenhouse gas emitter, through the promotion of carbon sinks and sustainable land management**

As already mentioned, referring to Tasmania as a low greenhouse emitter is disingenuous and should have no place in this strategy.

The Intergovernmental Panel on Climate Change (IPCC, 2001) has described carbon sinks as, at best, a limited measure in the fight against climate change. Planting trees gives a one-off greenhouse benefit. While the trees are growing, they consume carbon. Once a forest matures it is often in a balanced carbon state. The decay (release of carbon) matches the growth (consumption of carbon) with only a small net intake of greenhouse gases. For tree planting to have any net greenhouse benefit the trees have to be maintained permanently without falling victim to fires, logging, disease or other devastation. Disturbing such forests through the industrial logging regimes widely used in Tasmania results in a massive release of carbon. This is a powerful argument to protect remaining temperate old-growth forests in Tasmania for climate change reasons, along with the usual arguments for biodiversity conservation, water catchment protection, specialty timbers and leatherwood honey production, landscape protection and tourism.

Not surprisingly, this objective also skates over the very real problems associated with land management practices in Tasmania and misses opportunities to address these issues. There are also still major shortcomings in Tasmania’s approach to landclearing controls.

**Objective 9: Support research into the impacts of climate change in Tasmania and the development of innovative responses to climate change**

We are supportive of this objective.

**Objective 10: Working with, and involving, the community in responding to climate change**

We are supportive this objective, and in conjunction with Sustainable Living Tasmania, Launceston Environment Centre and North West Environment Centre, are the four best placed organizations to help the Tasmanian Government in engaging with the wider community. We hope to discuss with you in greater detail in the near future.

**Conclusion**

We are pleased at the support expressed for the Kyoto protocol and urge the Tasmanian Government to continue lobbying the Australian Government to ratify this agreement. However, as we have already discussed, it is somewhat hypocritical to express support for Kyoto and then fail to implement measures to reduce greenhouse gas emissions. The Tasmanian Government must address this major failing of this strategy.

**Recommendations**

Our key recommendations for inclusion in a final Climate Change Strategy for Tasmania, chosen to compliment our comments above, are as follows:

1. The Tasmanian Government sets a minimum target of an 80% reduction in greenhouse emissions by 2050, with defined progress at key marker points along the way.
2. The Tasmanian Government develops a comprehensive and detailed carbon accounting database – just how much carbon is in the biosphere, how much is lost, how much is gained by each

management action – reviewed on an annual basis, on both a statewide and individual business basis.

3. The Tasmanian Government immediately implements a total ban on landclearing.
4. The Tasmanian Government develops and implements a strategy to reduce travel in private motor vehicles and the transport of freight on roads.

Please feel free to contact our office if you would like any further information on this submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Woodfield', with a stylized flourish at the end.

Craig Woodfield  
Director