Our Ref: TB | DJL

9 September 2025

Climate Change (State Action) Act 2008 Review Team
Ricardo and ERA Advisory
Via email: suki@era-advisory.com.au

Independent Review of Tasmania's *Climate Change (State Action) Act 2008*

Thank you for the opportunity to provide a submission on the review of the *Climate Change (State Action) Act 2008* (the Act). This submission has been prepared by the Local Government Association of Tasmania (LGAT) on behalf of Tasmanian local government in collaboration with our members; all 29 councils.

LGAT is incorporated under the *Local Government Act 1993* and is the representative body and advocate for local government in Tasmania. Where a council has made a direct submission to this process, any omission of specific comments made by that council in this submission should not be viewed as lack of support by LGAT for that specific issue.

Please contact Tim Boyle, Senior Policy Advisor if you have any questions or would like further information, at tim.boyle@lgat.tas.gov.au or 0409 335104.

Yours sincerely,

Dion Lester
Chief Executive Officer

LGAT Submission: Independent Review of the Climate Change (State Action) Act 2008

Introduction

For Tasmanian communities to be climate-resilient they must be supported by strong and enduring partnerships between State Government and councils. Local government envisions a future where leadership on climate action is shared, policy and regulation are forward-looking and supporting of local needs, and councils are equipped to work alongside their communities to address the impacts of climate change.

The Act is largely process-driven and is limited in its ability to deliver tangible outcomes in emissions reduction and climate risk mitigation. Emissions from key sectors are rising, but are obscured by our State having 'reached net zero'. The state lacks a funded, comprehensive adaptation plan that responds to the Tasmanian Risk Assessment for Climate Change. Councils are increasingly burdened with climate responsibilities, with state-level policy frameworks and funding mechanisms inadequate, fragmented, or outdated.

Actions

To address these challenges, we recommend:

1. Updating the objectives of the Act to be outcomes-focused, explicitly targeting sector specific emissions reductions (excluding the land use, land use change and forestry (LULUCF) sector) and risk mitigation.
2. Legislating the requirement for a continuously funded and implemented climate change action plan, and an adaptation plan.
3. Ensuring state policy and strategy environments, including, but not limited to the *State Coastal Policy*, are contemporary and supportive of state and local climate action.
4. Establishing a sustained and funded partnership with local government, including the continuation of the Tasmanian Local Government Climate Capability Program and place-based adaptation funding.

General Comments

Tasmanian Communities Are at Risk and Emissions Are Increasing

Tasmania's Risk Assessment for Climate Change 2024 detailed 15 'Tier 1' risks and 11 'Tier 2' risks, across the natural, social, economic and built domains. Although the State Government has delivered a response to the risk assessment, no adaptation plan has been developed, no additional funding has been assigned, and adequate actions are not being taken to address the identified risks. A number of these risks are associated with local government functions and services and require local adaptation responses, yet these have

attracted no additional funding or resources. These gaps expose communities to escalating climate hazards, strain council resources, and jeopardize long-term resilience planning.

The review Discussion Paper, supported by findings in *Tasmania's Greenhouse Gas Emissions Report 2025*, clearly indicates that emissions from key sectors (including transport, agriculture, direct combustion, industrial processes, and product use) are increasing in absolute terms. While Tasmania maintains a net-zero status due to carbon sequestration in the LULUCF sector, the upward trend in sectoral emissions undermines the integrity of the net-zero objective. This trajectory is incompatible with the broader goal of mitigating climate change. Accordingly, the current framing of the Act's objective to achieve net-zero emissions is insufficient and does not adequately address the need for sustained and measurable reductions across all emitting sectors, in line with Australia's international commitments.

Councils Are Bearing the Load of Climate Action

The IPCC's latest projections indicate that without immediate and deep reductions across all sectors, global emissions are expected to continue rising. In spite of our current net-zero status, Tasmania will be subject to increasing risks and must adapt to minimise impacts. As well as increasing the frequency and severity of natural disasters, climate change poses a critical risk to infrastructure, facilities, housing, jobs, food systems, environmental and human health.

Across Tasmania many councils are taking an active role in climate change through reducing their emissions, managing climate risk, and adaptation activities for their own assets and their communities. The proposed changes to role of councils under the *Local Government Act 1993:*

"*promoting the social, economic, and environmental sustainability of local communities, including by mitigating and planning for climate change impacts*" will further embed climate action.

A recent report by the Australian Local Government Association (ALGA), *Adapting Together: Local Government Leadership in a Changing Climate* (2025), estimated that by 2030 Australian councils would invest up to $2 billion in climate adaptation efforts, providing community benefits of between $2.2 and $4.7 billion.

State-Level Climate Action Needs to Be Reprioritised

Tasmanian councils and communities face significant climate change-related risks that are only increasing. At the same time the State Government is cutting climate change expenditure, have a lapsed climate change action plan, and uncertain or poorly maintained policy and regulation. This collectively undermines councils' efforts to mitigate and adapt to climate change impacts and risks at the local level.

The Act must be amended to mandate the continuous presence of a funded and implemented climate change action plan, without gaps between planning cycles. The current wording allows for a plan to be developed for a shorter term than the renewal period, which

leads to periods such as 2026-2028 where there is no requirement for a climate change action plan to be in place. This risks the whole state going backwards on climate risk and emissions.