

30-1 2007

## **Comment on Draft Tasmanian Climate Change Strategy and Action Plan**

The draft strategy, despite supporting the Kyoto Protocol, fails in several ways and those failings are serious.

We do applaud the recognition of human induced climate change and the acknowledgement of accelerated change. However a genuine acknowledgement would also bring the communication of an understanding of the seriousness of the challenge.

This draft document however appears to place the impacts into the future and almost denies the fact that climate change is already happening. We are living with greenhouse gas level of 30 to 40 years ago in terms of the time-lag of its impact.

The draft strategy fails to implement the concept to intergenerational equity.

### **Rights of future generations**

The scope of ethical concern also extends towards future life.

The rights of future generations have been referred to in a number of international instruments such as the Convention of the Protection of the World Cultural and Natural Heritages (UNESCO 1972), the Rio Declaration (1992), the resolutions of the UN General Assembly relating to the protection of the global climate adopted since 1990, or the Declaration on the Responsibilities of the Present Generations towards Future Generations (UNESCO 1997).

Such a principle may be seen as a consequence of the principle of environmental justice.

The draft strategy fails to use the precautionary principle.

### **Precautionary principle**

The precautionary principle seems to be susceptible of consensus but need better understanding. However, bringing together the work of the group of experts on the precautionary principle (who have explored the understanding of the principle) and the group of experts on environmental ethics, the following provisional wording may be proposed:

When human activities may lead to morally unacceptable harm that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm.

*Morally unacceptable harm* refers to harm to humans, other living beings, or the environment that is:

- Threatening to life or health or:
- Serious and effectively irreversible or:
- Inequitable to present or future generations or:
- Imposed without adequate consideration of the fundamental rights of those affected.

The judgment of *plausibility* should be grounded in scientific analysis. Analysis should be ongoing so that chosen actions are subject to review.

*Uncertainty* may apply to but need not be limited to, the causes of the possible harm.

Actions are interventions that are undertaken before harm occurs that seek to avoid or diminish the harm. Actions should be chosen that are proportional to the seriousness of the potential harm, with consideration of their positive and negative consequences, and with an assessment of the moral implications of both action and inaction. The choice of action should be the result of a participatory process. The Precautionary Principle is notably mentioned in the 1992 Rio Declaration or the World Conference on Science in Budapest (1999). Where the Precautionary Principle is invoked because there is reason to believe that there is a risk of irreversible damage to a natural system, the action to be taken should be tailored to objectively foreseeable consequences both for nature and for society, without the need to have a further debate about whether nature is vulnerable or resilient enough to recover in any case. Global warming is an important case to which this idea may be applied. Human activities increasingly have an irreversible impact on the environment and this impact is increasingly uncertain. Hence the relevancy and applicability of the principle is more and more manifest.

Relying only on current knowledge is totally insufficient as the rate of knowledge is rapidly expanding and is being updated. A commitment to the precautionary principle is essential in this instance. The Sharples report (DPIW), for example, is already out of date as it was predicated on sea level data that is superseded by the British Antarctic survey study into the rate of melt of the Antarctic ice shelf. A commitment to the precautionary principle is essential in dealing with this subject.

Does the state coastal policy consider sea rise adequately?

The draft strategy fails to pursue sustainable development. It fails on this last score principally because it does not commit to the burden of proof resting with development proponents having to show that their development will not further exacerbate greenhouse gas pollution.

The goals of the draft strategy are inadequate. The goals do not advocate the maintenance of a stable population base. Increasing population will increase greenhouse gas pollution. Tasmania can lead the world in advocating a stable population base. Currently however it aspires to population growth. The notion that increasing population is sustainable is wrong.

Another goal that should be included is to reduce activities which are known to have an adverse climate change impact.

It is vital when developing a holistic response that the precautionary principle is legislatively incorporated into all levels of decision making.

Further it is essential that all development proposals carry the burden of proof. Such a burden of proof needs to be written into all the state's planning and development legislation.

Such a burden of proof requirement has already been considered an appropriate ethical necessity.

#### **“Burden-of-proof” principle**

A practical implication of the principle of respect for life and the Precautionary Principle may be the principle of the “burden of proof”. Humans ought not to destroy values in nature, not at least without overriding justification. In other words, the burden of proof should lie with those who want to commit action that endangers living beings, rather than with those who claim that action should be restrained because of dangers to the environment.

The strategy should consider that those activities which exacerbate climate change are considered to be against the public interest and the greater good.

The strategy needs to take account of the advice of the Intergovernmental Panel on Climate Change. It is noteworthy that this panel is warning of having only ten years to reverse global meltdown (see Australian 29-1-2007).

We strongly encourage that the draft strategy needs a complete overhaul in line with the latest scientific knowledge and the conveying of the urgency and importance of the matter to the Tasmanian public be in line with that knowledge. That the essential targets set in the strategy must be in line with that advice and must be easily updateable to remain current and relevant.

Currently the draft strategy effectively misleads and that misleading is gross in its breadth and extent. In our view it is a negligence and malfeasance.

It is already known that climate change is exacerbated by many industrial activities yet this strategy unacceptably fails to advocate effective and durable mitigation of those activities. This is an unacceptable and irresponsible deficiency of the strategy.

Funding for mitigation should be sourced through carbon emission offsets. Greenhouse polluters and funds investments managers and others are looking for places to invest such funds. A national carbon trading scheme is urgently required. Tasmania should work through the COAG process to strongly press for a speedy implementation of a national carbon trading scheme

Already the Commonwealth Government through the EPBC Act has identified climate change as a Threatening Process.

Climate change threatens a wide range of species some of which are all ready under threat of extinction from human activities. Where is the recognition of this fact in the strategy?

Climate change should be listed as a threatening process under Tasmanian state legislation such as the Nature Conservation Act. Then the state could actually fund an effective threatened species unit and set of recovery programs that consider climate change impacts. Those other species identified as vulnerable under climate change should be listed now.

It is not enough to only "consider" reducing greenhouse gas emissions. The Intergovernmental Panel on Climate Change's warning is far more serious than that. They are saying that in effect we have run out of time and must act now. Where are the targets?

We already know the greenhouse gas emitters and can create specific targets and specific actions to meet those targets. To not do so is irresponsible in the extreme indeed some would say it is genocidal.

It is irresponsible to adopt a laissez faire approach to climate change. This draft strategy does that and it is a pathetic piece of disempowerment through inevitability.

Although the magnitude of climate change may be uncertain that should not be used as an excuse to not implement stringent and responsible targets and actions. Not an excuse to have a research focus pretending that is sufficient response whilst actually avoiding the actual necessary measures of abatement.

The ripping out of the primary forests of Tasmania with attendant mega burning of millions of tons of wood carbon annually is an excellent example of the gross irresponsibility which could be stopped. It threatens, it is unsafe, it is a greenhouse polluter an atmosphere polluter and a water polluter and proceeds without any science as to its long term impacts.

The draft action plan (within the draft strategy) recognises forests as carbon sinks and then ignores the deforestation and depletion of carbon of the largest wood based carbon sinks, those of the ancient forests of Tasmania. Those primary forests should be retained. Woodchipping and attendant clear felling and near clear felling of primary forests is an extractive unsustainable greenhouse polluter that is against the greater good and the public interest. Right now woodchip royalties from natural forest extraction should fund mitigation measures.

There is no evidence that voluntary systems protect threatened species indeed the private land conservation program under the RFA manifestly showed that even with some incentive woodchipping won with monotonous regularity over voluntary conservation under the RFA and the government knows it.

Indeed the need for change regarding climate change impacts is so urgent and crucial that legislation to change behaviours is essential. This should occur without delay.

This strategy fails to identify the many greenhouse threats occurring in Tasmania.

There is no recognition in the draft strategy that modern commercial farming in Tasmania is almost universally bringing about a draw down in soil carbon levels. DPIW's own research shows this fact but this strategy pathetically ignores the fact. When are you going to wake up?

No promotion of organic agriculture which at least has systems in place to build up soil carbon. Ploughing increases carbon loss. Put carbon back into the soil through changed and holistic agricultural practice.

Why is the burning of straw and other stubble not outlawed for example? Why is it not mentioned in the draft strategy? Why is burning of biomass in general such an inveterate habit that goes uncontrolled? Forest burning removes accumulated carbon and should be regarded as a threatening process.

Irrigation is a culprit in soil carbon reduction as it intensifies the agricultural activity with a concomitant drawing down soil resources yet that is not identified.

Coal royalties are too low in Tasmania. Coal royalties should fund mitigation measures. Coal consumption and its concomitant carbon emissions just went up in Tasmania with the introduction of Basslink. However Basslink could be an opportunity to sell increased renewable power.

A climate change package of effective Tasmanian legislative and regulatory amendments needs to be introduced urgently to reorient efforts being made towards sustainable development to include mitigation of climate change impacts. Such change should be detailed in a strategy.

Mandatory energy efficiency programs through government preferred spending should be introduced. Such initiatives are strategic.

Developers need to show how they will offset carbon emissions in their development proposals. An emission budget should be included in every major development. And that should include the Gunns Ltd Pulpmill proposal.

Government has the temerity to call the second part of this draft strategy an action plan. We are expending future generations opportunities by our irrational dangerous and selfish behaviours. Climate change is a threat to our survival. By all means create an action plan but make it realistic given the nature and extent of the problem.

Regarding transport we should be seeking zero emission fuels and increased public transport. We can encourage local production and local consumption. Promote buy local. There is a greenhouse mitigation message that will strike a patriotic chord with Tasmanians. To have transport dependant on fossil fuels is to be not prepared for climate change and the attendant economic changes that will follow. Tasmania's is vulnerable regarding transport carbon emissions.

This draft strategy fails the intergenerational equity test of sustainability.

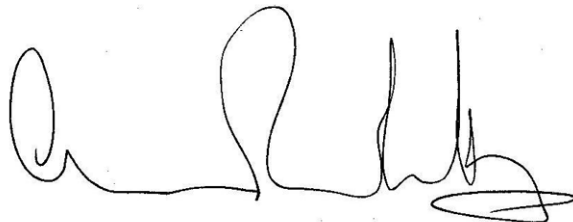
Sustainability of the biosphere

The planet as a biosphere is fragile, and its preservation is probably more important than the preservation of any single individual, species or ecosystem, except perhaps that of human beings.

Had the government thought about considering actions which may lead to a reversal of climate change?

This is a strategy that should be reviewed and updated very regularly, say every two or three years.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew Ricketts', with a large, stylized initial 'A' and a horizontal line extending across the middle.

Andrew Ricketts