



Tasmanian Council of Social Service Inc.

Embracing the climate challenge: Tasmania's draft climate change action plan 2016-2021

TasCOSS submission

March 2016



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About TasCOSS

TasCOSS is the peak body for the Tasmanian community services sector. Its membership comprises individuals and organisations active in the provision of community services to low-income, vulnerable and disadvantaged Tasmanians. TasCOSS represents the interests of its members and their clients to government, regulators, the media and the public. Through our advocacy and policy analysis and development, we draw attention to the causes of poverty and disadvantage and promote the adoption of effective solutions to address these issues.

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TasCOSS recommendations

1. TasCOSS recommends that the Tasmanian Government:
 - Resource Tasmanian community sector organisations to undertake climate change and natural disaster risk management;
 - Work with State community sector peaks and the insurance sector to ensure community sector services can access affordable insurance that specifically addresses climate change and extreme weather risks;
 - Assist the development of relationships and partnerships between Tasmanian community sector organisations and those parties with responsibility and expertise in climate change adaptation and emergency management; and
 - Include mechanisms in contracts with community sector organisations that enable them to participate effectively in disaster response and recovery efforts.
2. TasCOSS recommends that the Tasmanian Government substantially increase its commitment to improving the energy efficiency of Housing Tasmania's stock, and to replacing inefficient heating appliances with more energy efficient models.
3. TasCOSS recommends that the Tasmanian Government introduce a program for low-income tenants in private rental properties that provides energy efficiency upgrades to rental properties and energy usage advice to tenants.
4. TasCOSS recommends that the Tasmanian Government provide TasCOSS with \$60,000 for the implementation of community-based affordable energy workshops.
5. TasCOSS recommends that the Tasmanian Government ensure that NILS continues to be funded to provide energy saver loans and subsidies over the full forward estimates period and that the quantum of funding provided by the Government is increased in consultation with NILS.
6. TasCOSS recommends that the Tasmanian Government broaden the energy efficient measures for which low-income households can pursue no interest loans.
7. TasCOSS recommends that the Tasmanian Government assist the community sector to improve the energy efficiency of its infrastructure through direct grants, or mechanisms similar to those being developed to support similar efforts by small to medium enterprises.
8. TasCOSS recommends that the final version of Tasmania's Climate Change Action Plan address issues associated with the effects of climate change on the health and wellbeing of the Tasmanian population and, in particular, on vulnerable population groups.

9. We further recommend that the revised Action Plan identifies responses to the effects of climate change on health and wellbeing and proposes appropriate preventative, adaptive and remedial actions that can be undertaken to minimise negative effects.
10. TasCOSS recommends that the Tasmanian Government begin the process of bringing its level of transport funding to \$300 per capita per year, or \$150 million per year.
11. TasCOSS recommends that the Tasmanian Government develop a strategy to assist low-income and disadvantaged Tasmanians to gain skills that will be required for the expansion of the renewable energy industry.
12. TasCOSS recommends that the Tasmanian Government develop a strategy to assist low-income and disadvantaged Tasmanians to gain skills that will be required for the expansion of the renewable energy industry.

Introduction

The Tasmanian Council of Social Service (TasCOSS) welcomes this Draft Climate Change Action Plan and the opportunity to contribute to the further development of the Plan.

TasCOSS has a particular interest in seeing the State Government adopt and fully implement a robust and comprehensive Climate Action Plan. While climate change affects us all, some Tasmanians are more vulnerable to its effects than others.

The Tasmanian community service sector assists, supports and advocates for people experiencing disadvantage in its many forms. As the impact of climate change is felt, those who are already disadvantaged may face increased stresses, and many people who are currently in a place of security may experience life changing events making them suddenly vulnerable. Climate change might also impact and disrupt community sector infrastructure, making it harder to assist and support people in need.

The ability of the community sector to plan for and meet the challenges of climate change is therefore of critical importance to the lives of many, as it is likely to affect vulnerable people's ability to access basic needs such as food and shelter, as well as to access support for ongoing challenges such as financial and emotional stress, illness or disability.

Our submission

The content of this submission focusses on consultation question one: *What practical actions should we prioritise over the next five years in our response to the issue of climate change?*

TasCOSS will not comment on the other three consultation questions, as we do not have appropriate expertise on these matters. We do, however, support the Tasmanian Government taking the maximum action possible to address climate change given the disproportionate effect it will have on low-income and vulnerable people.

Community sector risk management

There is no doubt that climate change will increase Tasmania's risk of natural disasters. The community sector must improve its risk management and preparation for emergencies if it is to meet the challenges ahead.

The Draft Climate Change Action Plan (Draft CCAP) states:

Tasmania can still expect increased frequency and intensity of natural hazards such as storm surge, flooding, erosion and bushfires. These risks can be managed, providing we prepare for them adequately. A risk management approach to future climate impacts will assist our businesses, communities

and government to prepare for, respond to and recover from climate-related extreme events. (*Draft CCAP p8*)

In 2013, the Australian Council of Social Services (ACOSS) commissioned the first ever national survey to investigate how prepared the community welfare sector is for the impacts of climate change. The survey and associated research were conducted by the National Climate Change Adaptation Research Facility, with the final report entitled *Adapting the community sector for climate extremes*.¹

The research found that community sector organisations are highly vulnerable and not well-prepared to respond to climate change or to extreme weather events caused by climate change, with many small and medium-sized organisations at risk of permanent closure as a result of major damage to physical infrastructure and disruptions to critical services. For example, the survey results demonstrate that one week after an extreme weather event 50% of organisations that sustain serious damage to their premises would still be out of operation and 25% might never provide services again.

The report makes a number of recommendations for actions that will assist community service sector organisations; these recommendations involve the provision of resources, sector preparedness and resilience building activities and sharing risks.

Since the release of the report, ACOSS has been involved in developing an online risk management and benchmarking tool to assist community sector organisations to understand and prepare for the changes their services and clients face. ACOSS intends to commence trials of this tool in April 2016, with one Tasmanian community being involved in a pilot project. The pilot projects will then be subject to a final evaluation, with ACOSS intending to make the online tool available to all community sector organisations at a later date.

The Draft CCAP acknowledges that vulnerable members of the community may not be able to plan and manage risk (*Draft CCAP, p13*). TasCOSS believes that it is likely that vulnerable Tasmanians will seek assistance from community service organisations which must be prepared and well-resourced for the task.

In order to enable this and to continue the important work commenced by ACOSS, TasCOSS sees an important role for the Tasmanian Government, and makes the following recommendations.

¹ Mallon, K, Hamilton, E, Black, M, Beem, B & Abs, J. 2013. *Adapting the community sector for climate extremes: Extreme weather, climate change & the community sector – Risks and adaptations*. National Climate Change Adaptation Research Facility, Gold Coast, 286 pp.
https://www.nccarf.edu.au/sites/default/files/attached_files_publications/Mallon_2013_Adapting_community_sector.pdf

TasCOSS recommends that the Tasmanian Government:

- 1. Resource Tasmanian community sector organisations to undertake climate change and natural disaster risk management;**
- 2. Work with State community sector peaks and the insurance sector to ensure community sector services can access affordable insurance that specifically addresses climate change and extreme weather risks;**
- 3. Assist the development of relationships and partnerships between Tasmanian community sector organisations and those parties with responsibility and expertise in climate change adaptation and emergency management; and**
- 4. Include mechanisms in contracts with community sector organisations that enable them to participate effectively in disaster response and recovery efforts.**

Community sector role in informing vulnerable Tasmanians about natural disasters

TasCOSS welcomes the Tasmanian Government's following action item in the Draft CCAP:

Working with community sector organisations, identify vulnerable community groups and develop programs and initiatives to improve their response and resilience to climate change. (p35)

We recommend this action item also include consideration of how to prepare vulnerable people for natural disasters. While the Draft CCAP commits to creating an online portal with information about natural hazards and resources to assist (p14, p17), it is unlikely that an online portal will meet the needs of all Tasmanians. Many people, including those without skills or equipment to access the Internet, will require information to be provided to them in a different and a more direct format.

The Government should consider providing resources to community sector organisations to educate and inform vulnerable people about what to do in the event of bushfire or flooding. Many community sector organisations are locally based within the communities they support and are therefore likely to be able to reach individuals and households who are traditionally difficult to reach.

TasCOSS recommends that the Tasmanian Government provide resources to appropriate community sector organisations to assist with educating and preparing vulnerable populations for natural disasters.

Energy efficiency

TasCOSS has long advocated for increased public assistance to enable low-income households in Tasmania to make energy efficiency improvements to their dwellings. Improving energy (and thermal) efficiency of housing stock has the potential to not only reduce greenhouse gas emissions that contribute to climate change, but also to allow low-income households to save money by reducing their energy usage.

While TasCOSS is pleased to see a commitment in this Action Plan to invest in improving the energy efficiency of Housing Tasmania properties and heating appliances therein, we are very disappointed at the number of properties targeted in the five-year period of the Plan. According to the Draft CCAP, the *Save Home Energy Program* will involve the upgrade of heaters in 100 properties and installation of ceiling insulation in only 50 properties. Over the five-year period of the Climate Change Action Plan this equates to 20 heaters and 10 insulation upgrades per annum. TasCOSS sees this as a very poor effort given that total public housing stock numbers stood at 7,456 in June 2015.² We understand that some properties and heaters have been upgraded under programs of the previous government, however, we are disheartened to see such a limited commitment in this new Action Plan. Housing Tasmania's stock is ageing³ and TasCOSS would like to see a concerted effort over coming years to improve its energy efficiency.

TasCOSS recommends that the Tasmanian Government substantially increase its commitment to improving the energy efficiency of Housing Tasmania's stock, and to replacing inefficient heating appliances with more energy efficient models.

Tenants in private rental properties also do not have the right (nor often the resources) to make capital improvements to increase the energy efficiency of their homes, and despite efforts they might make to reduce energy use, are subject to the condition of housing in which they reside. TasCOSS would like to see the Tasmanian Government introduce a program like the very successful *Power Savings for Tenants Project* (2012-13) that focussed on improving the energy efficiency of rental properties with low cost energy efficiency upgrades and advice to tenants on energy use and behaviour change. The Project involved the provision of upgrades and advice to 813 households and resulted in an average reduction in energy costs of almost \$200 per year per household.⁴ This represents a significant savings on energy costs to tenants, many of whom were living on low incomes, and is likely to have also improved the amenity of the properties and the comfort of tenants.

TasCOSS recommends that the Tasmanian Government introduce a program for low-income tenants in private rental properties that provides energy efficiency upgrades to rental properties and energy usage advice to tenants.

² Tasmanian Government. 2015. *Tasmania's Affordable Housing 2015-2025 Strategy*. p 20. Accessed on 18 March 2016. http://www.dhhs.tas.gov.au/housing/key_projects_for_2014-15/tasmanian_affordable_housing_strategy

³ Housing Tasmania. 2012. *Housing Tasmania Strategic Plan 2012-2017*. p 5. Accessed on 18 March 2016. Available at: https://www.dhhs.tas.gov.au/_data/assets/pdf_file/0012/113007/HousingTasmania_StrategicPlan20122017_Approved_2-web_version.pdf

⁴ Sustainable Living Tasmania. 2013. *Power Savings for Tenants Project: Final Project Report*. SLT Hobart.

Community based affordable energy workshops

TasCOSS welcomes the Tasmanian Government's commitment in the Draft CCAP to:

Facilitate workshops for community sector workers to equip them with information about programs vulnerable clients can access to help with their home energy use. (p35)

TasCOSS has developed a business case for such a program at a cost of \$60,000 for a one-off Statewide workshop program.

TasCOSS recommends that the Tasmanian Government provide TasCOSS with \$60,000 for the implementation of community-based affordable energy workshops.

YES – Your Energy Savings – Hardship Program

TasCOSS welcomes the continuation of State Government assistance to Aurora Energy's YES program (Hardship Program) to support its customers experiencing financial hardship in meeting their energy costs.

NILS energy saver program

TasCOSS also welcomes the continuation of the NILS Tasmania energy saver program that provides loans and subsidies for low-income Tasmanians to purchase energy efficient white goods and heaters. We understand that the subsidy covers the shortfall, for instance, between the cost of an energy efficient heat pump and the loan that can be provided by NILS, and thereby enables the purchase. It is vital that this subsidy not only continues, but is increased, along with the capacity of NILS to make loans for this purpose. However, we have been made aware that while funding for the subsidy appears in the State Budget forward estimates for 2016-17, it does not appear thereafter.

TasCOSS recommends that the Tasmanian Government ensure that NILS continues to be funded to provide energy saver loans and subsidies over the full forward estimates period and that the quantum of funding provided by the Government is increased in consultation with NILS.

We note that few low-income households can afford other important energy efficiency measures such as ceiling insulation or efficient hot water systems. We encourage the Government to enable no- or low-interest loans to be made available to low-income households to pursue a wider range of energy efficient measures.

TasCOSS recommends that the Tasmanian Government broaden the energy efficient measures for which low-income households can pursue no interest loans.

Improving energy efficiency of community sector infrastructure

Much of the community services sector relies on ageing infrastructure and often need to cover rising energy costs at the expense of service provision. With little or no savings or capital components to their funding, many community sector organisations cannot afford to invest in energy efficient upgrades in order to reduce their energy bills or to assist in reducing their greenhouse gas emissions.

TasCOSS notes the Tasmanian Government's commitment in the Draft CCAP to assist small to medium enterprises improve their energy efficiency (pp 27-29). TasCOSS encourages the State Government to include in this commitment support for community sector organisations to also improve the energy efficiency of their buildings and other operations.

TasCOSS recommends that the Tasmanian Government assist the community sector to improve the energy efficiency of its infrastructure through direct grants, or mechanisms similar to those being developed to support similar efforts by small to medium enterprises.

Health

TasCOSS is disappointed that the Draft CCAP does not address in detail the effects of climate change on population health and wellbeing, nor identify responses to those potential and actual effects or propose preventative, adaptive or remedial measures. This, in our view, is a major oversight in the Draft and should be rectified in the final iteration of the Action Plan.

This Plan is being developed at the same time – and for the same period (ie five years) – as the Tasmanian preventative health strategy. TasCOSS believes that the two plans should include some common elements in relation to the prevention of disease and the promotion of good health. That they do not is evidence of the need for the Tasmanian Government to adopt a Health in All Policies approach, as TasCOSS (and other organisations) recommended recently in response to the Draft *Healthy Tasmania Five Year Strategic Plan*.⁵

TasCOSS recommends that the final version of Tasmania's Climate Change Action Plan address issues associated with the effects of climate change on the health and wellbeing of the Tasmanian population and, in particular, on vulnerable population groups.

We further recommend that the revised Action Plan identifies responses to the effects of climate change on health and wellbeing and proposes appropriate preventative, adaptive and remedial actions that can be undertaken to minimise negative effects.

⁵ See TasCOSS submission to Draft *Healthy Tasmania Five Year Strategic Plan*
<http://tascoss.org.au/Portals/0/Documents/Publications/Submissions/TasCOSS%20sub%20Healthy%20Tasmania%20Five%20Year%20Strategic%20Plan%20Feb16.pdf>

Transport

Facilitating sustainable transport is a welcome area of focus of the Draft CCAP. However, we believe that the Draft CCAP does not go far enough in setting out action plans around increasing the uptake of public transport in the State.

The audit of Tasmania's greenhouse gas emissions indicates that at 2.03Mt, the transport sector accounts for 23.6% of Tasmania's total emissions (before discounting for carbon sinks in land use/land use change/forestry) of 8.6 Mt, and that emissions from the transport sector increased by 28% between the 1989-90 baseline and 2012-13—a rate tied for first place with that of energy industries.⁶

Despite good efforts in recent years by Metro Tasmania and other service providers, public transport services in the State are still substantially characterised by:

- limited hours and frequency of operations
- limited geographic scope
- limited integration in ticketing, physical location and timetables
- limited affordability
- limited eligibility, and
- limited information.⁷

Over the next five years, Tasmania should be prioritising expanded uptake of public and active transport, with a spending commitment to match. At around \$200 per capita per annum, Tasmania's per capita expenditure on public transport is the lowest of any jurisdiction in the country. It is unrealistic to expect that existing services can be adequately expanded, or innovative new services designed and trialed, on a starvation budget.

The State Government should set itself a five-year target of bringing levels of transport funding to \$300 per capita per year, or \$150 million per year, by 2021. Over this period, Tasmania should have a target of at least keeping transport emissions stable.

Improved uptake of public and active transport has the potential to deliver liveability dividends across a range of areas. Hobart is now the third most congested state capital in Australia and the most congested of Australian cities with populations of less than 800,000.⁸ Reducing traffic congestion furthers the liveability principles found in (for instance) the Urban Passenger Transport Framework, the Northern, Southern and Cradle Coast Integrated Transport Plans, the Residential Development Strategy, and the Hobart City Council Sustainable Transport Strategy.

⁶ DPAC 2015, *Tasmanian Greenhouse Gas Accounts: State Greenhouse Gas Inventory 2012-13*, p. 6.

⁷ TasCOSS (2014) *Transport in the Community Final Report*.

<http://tascoss.org.au/Portals/0/Documents/Publications/Reports/TasCOSS%20Transport%20in%20the%20Community%20Project%20report%20Oct%202014.pdf>

⁸ <http://www.themercury.com.au/news/tasmania/hobart-drivers-traffic-jam-struggle-is-real-as-survey-shows-tasmanian-capital-third-most-congested-in-country/news-story/b53f364173a1786158aeaac1788cbb3>

Provided that renewable electricity production expands, we can use our natural advantage of renewable energy generation to increase the use of electric cars in a sustainable fashion, with a concomitant liveability bonus of reduced air pollution and emissions from petrol and diesel engines.

Promotion of the use of public and active transport should be recognised as an objective of the *Climate Change (State Action) Act 2008*, along with energy efficiency and conservation. It should also be a key action item in this Climate Change Action Plan.

TasCOSS recommends that the Tasmanian Government begin the process of bringing its level of transport funding to \$300 per capita per year, or \$150 million per year.

Employment, skills and education

The Draft CCAP refers to the opportunity to increase Tasmania's renewable energy production and invest in the renewable energy workforce:

Tasmania ... must invest in the skills development and ongoing education of the renewable energy workforce to prepare for the expected demand. (p19)

However, this statement does not convert into a relevant action item under *Maximising our energy advantage* (Action items on p22)

Tasmania faces the challenge of ensuring that low-income and disadvantaged Tasmanians can also benefit from growth in the renewable energy industry. To achieve this TasCOSS contends that the State Government must plan for and provide increased educational and training opportunities to disadvantaged people in those skill areas which will be increasingly needed.

TasCOSS recommends that the Tasmanian Government develop a strategy to assist low-income and disadvantaged Tasmanians to gain skills that will be required for the expansion of the renewable energy industry.

We hope that our comments on the Draft Climate Change Action Plan are useful. We look forward to the amendment and finalization of the Plan and to its full implementation.