



Ricardo plc and Era Advisory

Independent Reviewers

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Submission via [online portal](#)

7 September 2025

Re: The 2024-25 Independent Review of the *Climate Change (State Action) Act 2008* (the Act)

Thank you for the opportunity to provide feedback on the *Climate Change (State Action) Act 2008* (“the Act”). The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia’s \$21 billion waste and resource recovery (WARR) industry. With more than 2,330 members from over 400 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies. Our members are involved in a range of important WARR activities within the Australian economy, including infrastructure investment and operations, collection, manufacturing of valuable secondary raw products from resource recovery, energy recovery as well as community engagement and education.

Being at the forefront of the ongoing evolution towards whole-of-system action and the development of a circular economy, WMRR strongly advocates for a systems-based approach to managing materials in Australia to prolong life and mitigate carbon impacts. This includes fierce advocacy for the waste and resource management hierarchy, which promotes avoidance of waste, and the diversion of materials from landfill through design for reuse, recovery, recycling and composting of resources. WMRR notes that very limited, high-level data about Tasmania’s emissions provided within the Discussion Paper made available for this consultation – which seems counterintuitive to a public consultation for a review that will address “*the extent to which the objects of the Act are being achieved*” and noting the Act’s initial object is to set a greenhouse gas reduction target for the whole of the state.

Please note a WMRR representative attended the industry workshop on 7 August 2025, and this submission provides WMRR’s detailed comments and recommendations for the Act to be revised to better meet its objects.

The Act

Currently, the Act sets the target to achieve net zero greenhouse gas emissions, or lower by 30 June 2030 (defined in s.5(2) as balancing anthropogenic emissions with anthropogenic removals each year). The Act enables regulations to prescribe interim state targets and sector-specific targets, and mandates the:

- Climate Change Action Plan (s.5A).
- Statewide Climate Change Risk Assessment (s.5B).
- Sector-based Emissions Reduction and Resilience Plans (ERRPs) (s.5C) currently for 6 sectors including Energy, Transport, Industrial Processes and Product Use (IPPU), Agriculture, Land-Use, Land-Use Change and Forestry (LULUCF) and Waste.

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- Annual Greenhouse Gas Report (s.5D) which details Tasmania's greenhouse gas emissions (by sector) and progress toward the net zero target.
- Annual Climate Change Activity Statement (s.5E) which reports on adaptation measures, emission reduction actions, and progress against sector plans.

The objects of the Act are to 'support Tasmania to take action on climate change' (s.4(a)) by setting a target to reduce Tasmania's greenhouse gas emissions (s.4(a)(i)), report and have parliamentary oversight on its progress against climate targets (s.4(a)(ii)), adapt to the impacts of climate change (s.4(c)), contribute to international national and local climate action (s.4(d)), and for the government to consult with stakeholders and the community (s.4(e)) including considering the impacts of climate change on future generations (s.4e(ii)).

In WMRR's view, these objects have not been achieved. Whilst annual reporting is mandated, the maintaining of the state's existing net zero positive status to 2030 'or lower' is not a reduction target and, noting that Tasmania achieved net zero over 11 years ago, demonstrates a lack of ambition - especially considering that the changes in the LULUCF sector have resulted in the state's increased carbon sequestration, greatly reducing Tasmania's greenhouse gas emissions to achieve this status. The Independent Reviewer's Discussion Paper shows that emissions for all sectors combined (excluding LULUCF) has remained unchanged for more than 30 years.

In WMRR's view, all sectors must meaningfully contribute to emissions reduction and mitigate climate change risks, and this requires systems thinking across all elements of the Tasmanian product and supply chains. It is well known that industrial activities have been the major contributor to climate change, largely through the release of greenhouse gases such as CO₂ from fossil fuel use and chemical processes in sectors like cement, steel, and chemicals. The Paris Agreement's central aim is to strengthen the global response to the threat of climate change by keeping a global temperature rise this century well below two (2) degrees Celsius above *pre-industrial* levels and to pursue efforts to limit the temperature increase even further to 1.5 degrees Celsius. It follows that tackling the challenge of climate change requires decarbonising industry by adopting cleaner processes and new technologies, while also managing the physical risks that climate change poses to the environment and the economy in order to protect the interests of future generations.

In WMRR's view, the Climate Change Risk Assessment does not go far enough to 'adapt' to climate change - infrastructure planning is needed to provide a pathway for vulnerable and emerging sectors, rather than continued reliance on LULUCF offsetting the impact of large emitters. Moreover, to meaningfully contribute to Australian and global net zero goals, the state needs to make a clear commitment (as other jurisdictions have done) to embed climate considerations into broader government decision making – a commitment that is inextricably linked to the government transitioning towards a circular economy. This means (among other things such as transitioning to low- emission technology) designing out waste and pollution, prolonging life of products, growing demand for secondary materials and reducing reliance on virgin materials.

Embedding climate action across all levels of government is also necessary because governments have the authority to enact laws, set standards, and create incentives to guide businesses and communities toward low-carbon practices. They are responsible for long-term planning and provide regulatory and policy certainty for investment in climate-friendly infrastructure and technologies and can use their financial influence by

implementing climate considerations in procurement rules and investing in low-emission technologies themselves.

Our recommendations:

In WMRR's view, the revised Act should:

- Legislate for a statutory obligation to take climate change into account so that climate considerations are embedded into government decision-making;
- Establish a specific and ambitious reduction target;
- Mandate that sectoral Emissions Reduction and Resilience Plans (ERRPs) include specific emissions reductions targets, and consultations to develop the plans should be wider than with "business and industry representatives", and also include communities, etc who will be affected;
- Mandate state-government funded sectoral strategies to implement the ERRPs;
- Go beyond the Statewide Climate Change Risk Assessment and mandate the development of adaptation plans to address the impacts of climate change on vulnerable sectors and infrastructure, and
- Establish an ongoing Parliamentary oversight mechanism – noting that this was abolished in 2014 when net zero was achieved. However the Act should legislate for emissions reduction, and a reduction target requires this oversight to ensure progress.

i. Legislate for a statutory obligation to take climate change into account so that climate considerations are embedded into government decision-making

Australia is increasingly falling short of its targets to reduce greenhouse gas emissions, achieving as of March 2025 only a 28% reduction in emissions. Australia's transition to a low-carbon circular economy urgently requires government leadership to facilitate trade in low-carbon and circular products. To support Australia's emissions reduction target, all states must prioritise how we extract and manage materials to mitigate greenhouse emissions. As noted in the Climate Change Authority's 2024 Annual Progress Report:

"Climate impacts are hitting home harder and more often for Australian communities. At the same time, major new markets are emerging for low and zero emissions goods as the world works towards net zero. Cutting emissions now is vital for minimising future climate damages and will position Australia to seize new economic opportunities."

WMRR encourages Tasmania to align with other states including Victoria, South Australia and New South Wales who have taken this step, recognising that strengthening and embedding carbon policy across government will foster both economic growth and climate resilience. All other state legislation should be assessed for climate impact and effect on future generations. This will help ensure that cross-government policy and regulation enables decarbonisation and the making of credible claims regarding circular production, drives investment in Tasmanian resource recovery industries and which proactively supports the development of markets for recovered products. By failing to commit to reduce its carbon emissions and transition to low carbon, circular supply chains, Tasmania is failing to mitigate the impacts of climate change.

ii. Establish a specific and ambitious reduction target

Offsetting should be viewed as a tool for unavoidable emissions, not a substitute for direct reductions, hence the need for emphasis on mandatory, deep emissions reductions first. Moreover, achieving net zero and future

proofing the environment and the economy are not the same thing, particularly if the state target has been primarily carried by one (1) industry's offsets.

WMRR recognises that there have been reductions outside LULUCF - the [Tasmanian Annual Greenhouse Gas Report 2025](#) shows that Tasmania's emissions from the waste industry decreased by over 25% between 1990 to 2023. However, this industry reduction measures anaerobic decomposition of organic matter from solid waste in landfills and during the treatment of wastewater only (which are also assisted by offsets) and the emissions associated with the energy used in the management and transportation of waste are reported in the electricity generation, direct combustion, and transport sub-sectors. Furthermore, emissions from the IPPU sector – which would capture resource recovery industries - increased by 13.8%. Thus, the overall picture does not reflect a low-carbon industrial economy.

The key to future proofing the environment and economy from the risks of climate change requires systems thinking and a transition to models of circularity, which are not catalysed by continued offset schemes for existing industries.

- iii. *Mandate that sectoral plans must include specific emissions reductions targets, and consultations to develop the plans should be wider than with “business and industry representatives” and also include communities who will be affected.*

As explained above, it is WMRR's view that every sector (including LULUCF) should have an emissions reduction target, if not annually, then at least for 2030. These targets should guide each sector to reduce their emissions and prompt climate change mitigation measures as a matter of course. This principle is linked to the embedding of climate action into government decision making. Legislating emissions reduction targets for sectors will provide the policy certainty for business, government and the community needs for the transition to net zero emissions. Targets set in law will encourage further investment in zero-emissions technologies, goods and industries which can facilitate sectorial shifts away from existing processes and towards decarbonisation. This is muchly needed in Tasmania given the reliance to date on offsetting LULUCF to achieve existing reductions.

WMRR notes that whilst the Waste ERRP identifies Tasmania's organic waste targets (reducing volumes to landfill), there are no emissions reduction targets for the sector. Having a sector plan inclusive of an emissions reduction target for the WARR industry could underscore investment in circular infrastructure such as resource recovery facilities and remanufacturing. In particular, investment in strategically located and sized organics facilities would make a significant difference to current emissions from the waste industry. For example, of the City of Hobart's total corporate emissions of 19,000 tCO₂-e in 2017-2018, 77% were attributable to waste (to landfill).

Resource recovery necessarily mitigates negative carbon impacts and promotes its sequestration, as well as reducing reliance on virgin materials. Not setting sector specific targets risks the State missing out on fostering economic growth in industries that support reduction targets, and instead, continuing to measure emissions via offsets. It also misses the opportunity to place climate change mitigation and adaptation obligations on industry – especially large emitters. NSW and Victorian regulators include requirements for methane emissions for WARR operations through license and permissioning functions.

Sectoral plans should also have broader community involvement, given the detailed object of the Act at s4(e) to support a consultative partnership approach with a broad range of stakeholders. The absence of broad stakeholder involvement in drafting these plans to date is noted, with initial consultation focused on business and industry. The object of the Act for collaborative partnership is diametrically opposed to a government approach that treats emissions reduction as a matter for negotiation with large emitters, with wider public consultation unnecessary.

iv. Mandate state-government funded sectoral strategies to implement the ERRPs

Adequate guaranteed multi-year funding commitments are essential to ensure that long-term action on climate change can be resourced. However, funding decisions are generally not legislated and remain the prerogative of governments through annual budgets. In order for the ERRPs to be successful, specific funding is required for its implementation. Whilst some grants have been allocated, not all opportunities have a funding source identified. Funding is imperative for local government, in particular, where actions identified are in addition to the current services provided by local government.

v. Go beyond the Statewide Climate Change Risk Assessment and mandate the development of adaptation plans to address the impacts of climate change on vulnerable sectors and infrastructure.

The Risk Assessment is designed to inform state scale decision making and does not recommend specific actions for implementation or address the variability of unique sectors and/or regions. To meet the object of the Act to adapt to the impacts of climate change (s.4 (c)), specific adaptation plans are needed. It follows on from having sector plans inclusive of sector reduction targets that adaptation plans should be required under the Act, particularly as the risk of climate change impacts, such as extreme weather events, increases over time with hazardous weather conditions becoming more frequent. WARR facilities already combat climate change risks on a regular basis, such as:

- Rainfall events can lead to stormwater surges, flooding of facilities, odour management issues for organic and putrescible materials, and access issues. This was seen in September 2024 across the state.
- Increased temperatures can increase fire risk at waste and resource recovery facilities and in transportation. This was seen in February this year with bushfires in the state's west.

These events can have a debilitating impact on the delivery of our essential services to the community, and the consequences of which may pose a real risk to environmental and human health. These can have wide impacts if not planned for and addressed, through appropriate risk management and monitoring. Adaptation planning is needed to cover the state's WARR facilities and should be underscored by a statewide WARR infrastructure plan that maps out the fates and flows of the state's waste and recovered materials in support of reduced sector targets (ie: reducing reliance on landfill and increasing access to resource recovery facilities). Such planning will not only ensure the state's environmental resilience but economic resilience as well.

WMRR notes that Victoria's *Climate Action Act 2017* establishes a system of periodic reporting to provide transparency, accountability and ensure the community remains informed, and requires Adaptation Action Plans across seven (7) sectors, which identify the challenges of climate change for each sector system, the extensive work already underway and the key priorities for the next five (5) years.



vi. Establish an ongoing Parliamentary oversight mechanism or independent advisory body

It is unclear the extent to which the current plans under the Act have contributed or are expected to contribute towards overall emissions reduction in the absence of an actual reduction target. To ensure that a specific reduction target and associated sector targets are met, the State Government should amend the Act to re-establish the Tasmanian Climate Action Council (disbanded in 2014) to provide independent expert advice to the Minister on implementing the Act, or establish an ongoing parliamentary oversight mechanism. Climate change is a global crisis that requires coordinated, large-scale action, which individuals and private companies alone cannot achieve. It is vital that the Tasmanian Government upholds the integrity of the Act.

WMRR trusts that these comments will be useful in the review of the Act. Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

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