

Climate Change Policy climatechange@act.gov.au

## Submission – ACT's Climate Strategy to a Net Zero Emissions Territory – Discussion Paper

I am pleased to provide this submission to the Territory's development of a climate change strategy to net zero emissions.

### **Implementation Status Reports**

I have reviewed the implementation status of previous ACT climate change policy in 2014 and most recently in 2017.<sup>1</sup>

My 2017 Implementation Status Report (ISR) recognised the leadership that the ACT Government and community has provided to date in its endeavours to take action on climate change. More notably the achievements of the ACT Government include:

- Securing 100% renewable electricity contracts
- Forming the Renewable Energy Innovation Fund
- Delivering the Next Gen Battery Storage Programs
- Effectiveness of the Energy Efficiency Improvement Scheme

The 2017 ISR provided 17 recommendations to ACT Government to help guide future climate change policy and ensure that it remains effective and relevant.

I am pleased that the Government agreed to 16 of these recommendations in their response released in February 2018. Many of these have been integrated into the policy discussion paper.

I provide the following comments to reiterate the recommendations made in the 2017 ISR.

# **Community Consultation**

The ISR report identified the need to more deeply consult and engage with the community to seek behavioural changes required for ongoing reductions in climate change. I note that Government has responded to this, and has incorporated many different engagement mediums to include the ACT

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<sup>&</sup>lt;sup>1</sup> https://www.envcomm.act.gov.au/publications/special reports and investigations/implementation-statusreport accessed 7 March 2018

community along the journey. Roundtables, reference groups, QnA sessions and social media (Facebook Live!) are all being leveraged in reviewing climate policy.

#### **Carbon Offsets**

The ISR report cautioned the ACT Government about the potential pitfalls of purchasing carbon offsets to achieve neutrality. I am of the firm view that this effort would be better invested into energy efficiency to ensure that our consumption of energy is curtailed, regardless of the source of supply. Whilst a social cost of carbon is one metric that could be used, the market rates for carbon offsets would also provide a valid and straightforward benchmark.

### **Energy Efficiency**

We have a resource problem. We need to be cognisant that transitioning from using coal based power to renewables requires a different set of supply chain resources. The drive for energy efficiency needs to be enduring to mitigate this changed resource demand and associated costs. Investing in energy efficiency has the double benefit of providing sustained savings and reducing household energy costs, particularly relevant for low income households.

I note that the ACT Government delivers several programs to foster energy efficiency in our built environment. These include the Actsmart programs and the Energy Efficiency Improvement Scheme (EEIS). Currently emissions savings are estimated based on the program initiative rather than actual energy use. I recommended that energy efficiency targets be monitored in the ISR 2017. This recommendation was not agreed to by Government. Establishing targets and monitoring and reporting on per capita energy use will ensure that real savings are being achieved and provide indications of any unintended consequences or behavioural changes that may reduce the effectiveness of energy efficiency initiatives.

Improvements to building regulations have been identified in 2016 to ensure that the built environment continue to be delivered with energy efficiency outcomes.<sup>2</sup> It is important that these improvements are implemented. This matter has been actively raised by the peak industry body in Canberra since 2010,<sup>3</sup> further reinforcing the need for these improvements to be progressed.

### **Low Income Households**

The 2017 ISR highlighted concerns about the potential for climate change policy to leave behind Canberra's more vulnerable households. I am pleased to have observed further progress by Government in this regard since the release of my report. Notably the Solar for Low Income Households project<sup>4</sup> has commenced, information has been improved to raise awareness of various

<sup>2</sup> 

http://www.planning.act.gov.au/topics/current\_projects/act\_building\_regulatory\_system\_review/improving\_the\_act\_building\_regulatory\_system\_review accessed 19 March 2018

<sup>&</sup>lt;sup>3</sup> https://the-riotact.com/time-to-act-on-building-quality/237662 accessed 19 March 2018

<sup>&</sup>lt;sup>4</sup> http://www.canberratimes.com.au/act-news/new-solar-rebate-program-for-low-income-homes-welcomed-by-canberrans-20171219-h072yh.html accessed 19 March 2018

support programs available and EEIS has retained its priority household target and expanded its accessibility.

It is critical that we continue to be mindful and actively mitigate impacts on our vulnerable households through our transition to a net zero emissions Territory.

## **Transport**

As noted in the ISR 2017, the transport sector is the next great challenge in reducing ACT's emissions. I observe the *Transport for Canberra* strategy is due to be updated. It is critical that this update occurs imminently and that the strategy includes firm and measureable outcomes in relation to reducing emissions. The strategy must consider all aspects of transport emissions including active travel, public transport, car share schemes, work from home arrangements and the transition to electric vehicles. The success of the light rail will be a significant contributor to emissions reductions. An appropriate way to measure and monitor emissions reductions associated with the transport sector will need to be developed.

I look forward to being integrally involved with the ACT's journey to achieve net zero emissions and welcome any further discussion in relation to this submission.

**Kind Regards** 

**Professor Kate Auty** 

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Commissioner for Sustainability and

the Environment

20 March 2018