

Senior Sustainability Officer,
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25 August 2021

Dear Tim,

Geelong Sustainability congratulates Council on its Draft Climate Change Response Plan (the Plan). Having participated in numerous engagement and co-designs sessions, we're pleased to see that the City has accepted its leadership role to support the community to tackle climate change.

We're especially pleased that the City has heeded the scientific evidence and set a community target of net zero community emissions by 2035. This bold target will signal to all stakeholders that Geelong wants to be at the forefront of the region's transition to a clean energy circular economy.

Introduction

Geelong Sustainability recognises that we are in a global and local Climate Emergency, the impacts of which will dwarf the impact of the Covid-19 pandemic in years to come. Australia's Climate Council recommends that Australia reduces its greenhouse gas emissions by 75 % by 2030 and to achieve net zero emissions by 2035 based on the latest IPCC report. Allowing emissions to continue to grow will result in warming which will be catastrophic for future generations. The decisions and choices we make this decade will determine whether today's young people have a liveable future or a planet that's incompatible with well-functioning human society.

Hence, this is a crucial moment for all levels of government to act with **at least** the urgency and focus that has been demonstrated during the Covid-19 pandemic. We welcome the leadership shown by the City of Greater Geelong in producing this Climate Change Response Plan and the opportunity to provide feedback.

Our submission is consistent with our supporter base and the widespread community expectations to prioritise urgent and effective climate action. The [Geelong Community Survey](#) (2020) of 559 residents revealed that

- 83% of respondents are concerned or very concerned about climate change predictions for our region, and about the predicted impacts for our region – flooding due to sea-levels, reduced rainfall, increased risk of bushfire and extreme weather.
- Just one in ten people (9%) feel that the City of Greater Geelong is addressing Climate Change effectively at the local level with
- 81% stating that the City of Greater Geelong should do more to help households, businesses and our region to reduce carbon emissions.

Positive comments

The Plan's seven principles cover a wide spectrum of climate action. It has many good features specifically:

- **Headline target** - GS welcomes the science-based target of net zero by 2035. We believe this target is essential. The latest IPCC report further heightens the urgency of acting immediately and the need to prevent every fraction of degree of warming.

- **Leadership role** - GS is delighted that the City has recognised its role in leading the community on climate action, alongside many other Councils across Australia and around the globe. As the level of government that interacts most with people and their daily lives, councils have a vital role to play in supporting and assisting their communities.
- **Focus beyond own operations** - GS has frequently applauded the City on its progress in reducing its operational emissions. While these actions can be a catalyst for change, GS is pleased that the City has recognised that it must lead and influence the entire community to respond to the existential threat faced by climate change.

Areas of concern

- **Implementation** - The Plan reads more like a strategy document than an actionable implementation plan. We suggest it needs to be formatted using the BZE Zero Carbon Communities Guide.
- **Insufficient business buy-in** - Business engagement in the development of the plan was very limited. This means that key stakeholders may either not yet consider they need to act on climate or be interested in doing so. A much higher level of engagement with the business sector is required given the high level of commercial and industrial emissions and that acting early on climate is an opportunity, whilst acting late will be harmful.
- **Inadequate resourcing** - Resourcing to achieve sufficient scale and impact will be critical. The City of Greater Geelong needs to view this transformation as of such critical importance to the future of our City that it will reallocate budget from areas which are not aligned with achieving the goal of net zero by 2035.
For example, removing current incentives which support/promote the use of private vehicles, or financial support for the Avalon Airshow. Whilst there are costs associated with taking action, the community needs to be aware that taking insufficient action is far more costly and that early action creates opportunity for employment and reduces longer term costs due to climate related damage.
- **First Nations voice insufficient** - We do not think the Plan adequately recognises Traditional Owners' culture, perspectives and practices. The Wadawurrung Healthy Country Plan can show us how to manage country as a means of addressing current climate and ecological crises.

Areas to clarify

- **Scope of Community** - There needs to be a clear definition of what is meant by the term "community". The Plan needs to apply to and engage all stakeholders including residents, workers, business, commerce, educational institutions, First Nations people as well as government agencies.
- **Alignment** - When will the actions from this Plan be embedded in other Council Plans?
- **Accountability** - Who's responsible is a critical question that needs more consideration?
- **Driving force** - GS thinks a broad based stakeholder group is required to build a consensus, seize the opportunities and drive the transition to a clean energy circular economy. It should include authorities, business, education, first nations and community members eg. ZEGG - Zero Energy Greater Geelong.
- **Cost of Actions** - Do the estimated costs represent the total cost to Council or the absolute total cost of the initiative? If the former, then some of the costs look questionable. Do we know the full costs of the Plan? This should not be used as a reason to delay the plan, but it does signal that the Plan has not yet received the attention and resourcing it deserves.
- **Staffing** - GS is encouraged to see that some additional resources will be allocated to fund positions within the City to implement the Plan. However we all know adequate resourcing will be essential for the Plan's successful implementation.

Areas to strengthen

- **Prioritise Actions re. Impact** - The Plan has 80 actions! Could they be prioritised into High, Medium and Low according to cost and impact? Prioritising actions that provide an

immediate “bang-for-buck” in reducing emissions will deliver early wins and build momentum and community buy-in. For example, electrification of housing and businesses using renewable energy and improving energy efficiency. GS does not support ratepayer funds being used for speculative or unproven projects like green hydrogen.

To assist in prioritising actions, it would be beneficial for the City to participate in the **Cities Activity Database**. This tool aims to allow Cities to compare actions with other similar Councils and make their Climate Action visible to higher levels of government to facilitate funding opportunities. Tools such as this will address the “data gap” for Councils and drive better targeted actions, aiding accountability. For more information, see [here](#).

- **Revision timelines** - Given the urgency for action and the rapidly changing energy and political environment regarding climate action, Geelong Sustainability recommends that the plan is revised before 2024 as three years is too long to revise strategies which may not be effective or to seize new opportunities which may arise.
- **Advocacy to state/federal governments** - Given the critical importance of effective bi-partisan collaboration between all tiers of government, we think Council advocacy for urgent climate action should be a high priority to both state and federal government. It is critical that our Council can effectively lobby all political parties and levels of government for effective climate action. All State governments now have legislated net zero by 2050 targets regardless of political party in power, which shows that bi-partisanship can be achieved. Local governments and leaders need to use their considerable power to lobby local Federal MPs for strong climate action too. There is an important role for the City to partner with G21 to convey this message to our leaders.

Geelong Sustainability suggests that key areas of advocacy should include :

- A legislated **national net zero emissions target** based on the current climate science with regular review such as [the Climate Act](#), proposed by Zali Steggall. Without this overarching framework, much federal climate related policy is piecemeal and ineffective.
 - Advocating for a **Planning Scheme Amendment** to allow local government to prevent connecting mains gas to new housing developments. Gas for heating is more expensive than efficient electric heaters, hence eliminating it from new housing will protect residents from energy poverty and improve human health (gas is linked to asthma and carbon monoxide poisoning) and the planet (due to the methane released in extraction and greenhouse gases from burning it). Given the high population growth in Geelong and high construction rates, it is critical that the City of Greater Geelong acts quickly to prevent the gas network from expanding when it is an inferior energy source for residents.
 - Advocating to ensure that **no new fossil fuel developments** within the City and the wider region. New fossil fuel developments are not consistent with the recent International Energy Agency recommendations which say that there must be no new fossil fuel developments, nor consistent with a target of net zero by 2035 across the entire business and residential sectors.
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- **Align Plan** - Further to this, the Plan needs to identify and align with key state government strategies, legislation and targets aligned with strong climate action and any federal government policies which prioritise climate action in order to take advantage of funding opportunities which may become available. For example, the state government will deliver a Gas Substitution Roadmap by the end of 2021. It is critical that the City advocates for the strongest measures possible to decarbonise our energy system if we are to reach net zero in the limited time remaining to avoid catastrophic warming.
 - **Promote opportunities** - The City needs to be clear and promote the opportunities are for Geelong in the energy transition. Climate action is an economic opportunity for Cities which are early adopters. What strengths can be leveraged to position our City for a successful

energy transition which creates employment for our citizens and how will workers who will need to transition to other forms of employment be supported to do so? There are crucial questions which need to be answered for the community to have confidence in the future ahead and their place in it. This will require Council to work closely with G21, Regional Development Boards and other government agencies, workers and employers within the community to develop a coherent transition plan with buy-in from across the entire community. The Latrobe Valley Authority provides a case study for how communities can transition away from fossil fuels and maintain high employment levels. Transition plans need to be proactive, not waiting until an industry collapses. Slow/late transition will result in missed opportunities and economic and social harms as capital will move towards regions which have created sound economic plans based on a decarbonised world and, concerningly, our trade partners move towards trade barriers for those countries which are not acting swiftly enough.

- **SMART objectives** - The document reads more like a Strategy document rather than an Action Plan. Many actions are not SMART objectives/actions (Specific, Measurable, Achievable, Realistic and Time-Limited). This makes it impossible to know if the Plan has been successfully implemented as time goes, resulting in poor accountability for the plan. An implementation plan, communications strategy and budget need to be developed using the BZE [Zero Carbon Communities Guide](#). There is also much duplication of text throughout the plan.
- **Interim 2025 & 2030 targets** - Other Municipal Climate Action Plans have featured key interim targets and milestones which show when key targets will be reached by and also assist with the community understanding what a decarbonised Geelong will look like eg. car-trips to the CBD are less than 10% of journeys by 2030 - this will help with reducing air pollution, improve fitness and reduced commute time due to less traffic. Most climate actions have multiple co-benefits associated with them, this needs to be emphasized. That is to say - climate action will create a better future and community for all!
- Carbon drawdown initiatives need to be included. Mitigation needs to be clearly stated as the priority over adaption.
- **Reporting is inadequate** - The targets need more frequent reporting. A year is too long when a key reference point is 2025. At least six-monthly reporting is needed. Once the procedure for reporting is established this should be a faster activity. It will be and should be a routine activity for this critical target. We strongly recommend an environmental dashboard is established that can educate and motivate action - see example, [City of Oberlin dashboard](#).

COMMENTS ON PLAN PRINCIPLES

Principle 1: Support an empowered and active community

The community awareness raising campaign needs to start in 2022, 2023 is too late [A1.1.1]. The response needs to match the urgency and threat associated with the risk, which is recognised as urgent and existential. We need active leadership from municipal leaders to show they understand the threat and are prioritising the response to it as demonstrated by leading Climate Action Cities such as the City of Adelaide.

There must also be very transparent reporting back to the community regarding progress on this Plan for the community to engage well and feel it is working in partnership and getting results for our rates and effort as volunteers. Accountability is also essential for successfully seeking resources from other levels of government.

A 1.1.3 - We welcome better ways of supporting more community climate action. The 'climate action strategic partnership fund' sounds like a great concept provided it is well resourced and funding is ongoing. What funding has it been allocated for FY2022?

Principle 2: Increase energy efficiency and renewable energy production

Council has the opportunity to signal the urgency of the transition away from fossil fuels by prioritising the removal of gas heating within its operations and publicising the benefits of this move to the community asap, not in the “longer-term”. Given the high cost and emissions associated with running gas appliances for heating systems and water at Council pools etc, there is no benefit in waiting for this infrastructure to reach the end of life before replacing with more efficient and low emissions heat pumps powered by cheap, clean renewable energy. New gas appliances and infrastructure should be banned within Council operations asap.

To address gas use amongst the wider community, we urge Council to seek a Planning Scheme Amendment immediately to prevent new developments from connecting to gas. This will have positive social, economic and environmental benefits for new residents as they will not have the cost of two service connections or high gas bills to pay compared to efficient electrically heated homes. There is no point connecting new households to gas when there are superior alternatives already available. Finally, given our high population growth rate, avoiding these emissions will make reaching net zero for the municipality easier to achieve at very low cost.

Residents of Geelong in many areas are now unable to connect new solar PV to the grid due to grid infrastructure capacity limits. In order to continue to support the required rapid growth in renewable energy, it will be important that households can access the benefits of cost-effective neighbourhood batteries. These need to be made widely available, not just “high-end” developments. It may be possible for Council to incentivise these types of developments by reduced planning application fees etc.

Council could provide incentives lower-income earners/landlords with cheaper rental properties who install solar PV on rooftop with lower rates and subsidise the cost of the Victorian Residential Energy Scorecard (\$400) to improve uptake amongst these disadvantaged groups.

Homebuyers and renters are poorly informed about the energy efficiency of homes prior to purchase and lease. Unfortunately in Victoria there is no obligation upon landlords or amongst agents/home sellers to disclose this. This lack of transparency has resulted in our housing stock having very low energy efficiency level and there is no incentive to upgrade it by housing owners wishing to sell/lease. This frequently results in those who are least able to afford high energy bills facing energy poverty as a result. In order to incentivise transparency and energy efficiency amongst residential homes, we suggest that Council investigates programs/advocate to the State Government to deliver programs which require this disclosure prior to lease/sale such as occurs in the ACT. The costs of providing this information are relatively low compared to the cost of an energy hungry house !

Finally, renewable energy and electrification is clearly low-hanging fruit which delivers immediate financial and emissions reductions benefits. We note that support for green hydrogen has been included as a strategy, which is not yet economically viable and also already receives support for funding by State and Federal governments. Council has limited resources to employ and expertise in this area so it is questionable as to whether this a good use of rate-payers money in the absence of Federal government policy to effectively incentivise green hydrogen (eg setting a Green Hydrogen target aka the RET would help drive investment of private capital as successfully drove the renewable energy industry in Australia.)

Principle 3: Switch to sustainable transport and cleaner fuels

The transport strategy must be highly targeted using the best available data regarding trip types, distances and frequency in order to prioritise the targeting of resources towards sustainable transport options. For example, school trips are high frequency and localised and amenable to converting to walking/cycling compared to many other trip types. We need detailed data outlining which trips in what locations and how these changes will be targeted by an intervention.

Whilst Electric Vehicles show promise in the medium term, it is important that we recognise that there are significant equity issues and unresolved sustainability issues associated with their use. There will

be a considerable time-delay in transitioning the fleet and expense. Electric vehicles are also greatly impacted by sub-optimal State and Federal government policy, whilst local government has a stronger control over active transport (walking and cycling) which can deliver the co-benefits of health and wellbeing that EVs cannot. Again, targeting the best bang-for-buck for immediate emissions reductions is required when we have scarce resources. The priority must be firmly upon reducing as many private vehicle trips as possible to ensure equity and best value for money.

Principle 4: Reduce non-energy emissions and increase carbon storage

Food Waste is acknowledged by Project Drawdown to be a key area to target to reduce emissions globally. There is an important opportunity which has been overlooked to Avoid and Reduce Food waste. Given a third of all food produced is not eaten there are many opportunities to support reductions in the CO2 emissions generated across the food system. The food waste hierarchy produced by Papargyropoulou et al (2014) provides important considerations to guide policy responses (see <https://ars.els-cdn.com/content/image/1-s2.0-S0959652614003680-fx1.jpg>)

Disposal - in the context of food waste management is the least desirable option - with the most desirable actions, at the top of the pyramid calling for attention to avoid surplus food generation across the food supply and to re-use surplus food for human consumption for people through redistribution. These foci do not diminish the importance of addressing food waste but serve to remind us that there are a range of priorities that might guide council level policy responses. Our experience with the Green Cafes Project which aimed to reduce and divert food waste from landfill illustrated the importance of creating systems which incentivise businesses to manage and reduce food waste on a daily basis.

Given food waste collection services have now been well established in South Australia for several years, and that Albury provides leadership and guidance - with 78% capture rate of all food and gardening waste and 0.5% contamination rate it is unclear why we need to delay and indeed why we need to pilot when other LGAs have done this work. For further information see [Albury Wodonga region sets organics collection benchmark – MRA Consulting Group](#)

Some additional analysis on NSW councils FOGO efficacy <https://mraconsulting.com.au/fogo-driving-reform/>

Sustainable agriculture is a critical means of achieving drawdown of emissions and must be incentivised by either local government or higher levels of government. Land managers need to be aware of and incentivised to take up their critical role in revegetation to manage the biodiversity crisis we are also facing at present. The Bellarine Peninsula offers an excellent opportunity to replicate the innovative work which has been done by Totally Renewable Phillip Island to fund carbon sequestration and improve local biodiversity by investing carbon offsets by local businesses and individuals at a local government level, rather than offsets being purchased for sequestration far away and with little local benefit or visibility.

Principle 5: Increase awareness and understanding of climate change impacts

We suggest adjusting the title of Focus Area 5.1 to "Improve climate risk knowledge for business and communities to improve their decision-making and adaptive capacity" to make it clearer as to who is being targeted and why.

It is also critical that we don't just focus on the physical risks associated with climate change. Businesses and communities need to understand the opportunities and threats associated with the energy transition (in particular a delayed energy transition) as communities who do not change their energy systems to decarbonise will be left behind by other nations which are early adopters. Australia is well placed to benefit from a transition to renewable energy, but this will need to be facilitated by strong civic and business leadership which can articulate the opportunities and way in which we will undertake this transition for the community to have confidence in the transformation and to maintain social cohesion.

Principle 6: Build climate action into decision-making

To ensure accountability for the Plan, it is critical that relevant actions from this plan are embedded into the **KPIs and Job Descriptions** of staff across the organisation. Responding to and acting on climate change is more than an environmental issue, it requires the active engagement of all staff. This may require significant investment of resources to ensure that all staff are aware of how their role can help address the climate (and ecological) crisis to produce the cultural and systems changes required, and is important if Council wishes to become a leader in acting on climate.

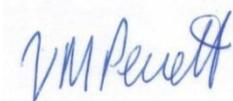
Principle 7: Increase collaborative climate change responses

Some excellent regional partnerships are mentioned which will be important for successful action on climate change. In addition to those outlined, Geelong Sustainability suggests that significant investment is made by the City to learn from and network with leaders from other Cities within Australia and around the world in order to **learn/share best practice in acting on climate change**. No Council should be working in isolation as we don't have time left to repeat mistakes made elsewhere. This is important for ensuring that best practice on climate action is embedded into the culture and systems of the organisation and that Council staff and leaders are the climate champions we need them to be.

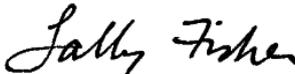
Examples of key opportunities for City-City collaboration include:

- Global Covenant of Mayors, <https://www.globalcovenantofmayors.org/who-we-are/>
- Cities Power Partnership (Climate Council), www.citiespowerpartnership.org.au
- Cities Activity Database, <http://form.jotform.co/212268222966863>
- Cities Race to Zero, https://www.c40knowledgehub.org/s/cities-race-to-zero?language=en_US

Yours sincerely,



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We thank and acknowledge the contributions of several of our members into developing this submission, in particular Neil Plummer and David Phillips.