

## SUBMISSIONS DUE Wednesday 25 August 2021 5pm

### The Project

City of Greater Geelong – [Climate Response Plan](#)

### WHAT TO INCLUDE IN YOUR SUBMISSION:

1. Go to <https://yoursay.geelongaustralia.com.au/CCRP> to lodge your submission.
2. Recommendation is to draft on a word or saveable document, then copy paste, just in case internet drops out and so you maintain a record.
3. Start by introducing yourself, why you care about the project and why you've taken the time to make a submission (for example as parent I am concerned.....)
4. Identify the key issues that you want to raise and why they concern you, refer back to key points and the project documents [include proposal link]
  - Make it as long or as short as you like, e.g. a few sentences or paragraphs or more.
  - Make it Unique, written in your own words. Include things that are relevant to you and the reasons why you are making a submission. Make sure if you are using the key points provided that to put them into your own words for your unique submission
  - Avoid unsupported claims. Use evidence and data to support your statements. You can reference sources if you feel confident they support your claims. This does not have to be formal referencing; you can simply include links to articles or reports you have read that back your claims.
  - Links to articles and further reading related to the project key points were shared via email. Don't link to the sources unless you feel comfortable with the content you are referring to. It is not necessary to include references but do ensure the points you make in your submission can be supported.
  - Be polite, respectful and clear. A lot is at stake, but the review team will dismiss submissions that are rude or target individual public servants.
5. Conclusion, summarise your submission and why you're asking for the Climate Response Plan to be reviewed and amended based on points raised. Reiterate why it is so important to you and your community.

### CONSIDERATIONS OF KEY POINTS TO INCLUDE IN SUBMISSION (you don't have to include all of the below, personalise it):

#### Introduction – why is this important?

Based on the latest science, and taking into account Australia's national circumstances, the Climate Council has concluded that Australia should reduce its emissions by 75% below 2005 levels by 2030, and achieve net zero emissions by 2035. (From [https://www.climatecouncil.org.au/wp-content/uploads/2021/08/IPCC-6AR-WGI-Explainer\\_updated.pdf](https://www.climatecouncil.org.au/wp-content/uploads/2021/08/IPCC-6AR-WGI-Explainer_updated.pdf) ). Consider including more information surrounding need to for urgent and scale in response.

#### Positive points:

- The science-based target of net zero by 2035 is essential. The commonly spoken target of net zero by 2050 is not adequate to avoid substantial risks and there is no time left to waste in decarbonisation. This clearly states the challenge ahead and means that action can NOT be delayed any longer to achieve this target given the transformation of our economy and society that is required to meet this challenge. The latest IPCC report further heightens the urgency of acting immediately.
- It is good to see that the City of Greater Geelong has recognised its role in leading the community on climate action, alongside other Councils across Australia and the globe. As a level of government rather than merely a corporation, it is significant that it has recognised that it must address emissions beyond its own operations and lead and influence the entire community to respond to the existential threat faced by climate change.
- It is encouraging to see some additional resources will be allocated to fund positions within the City to implement the plan.

- The Plan covers all the key areas for climate action in the seven Principles except for recognising Traditional Owner's culture, perspectives and practices to managing country as a means of addressing both the climate and ecological crises we are facing. A best practice example of integration and engagement of Wadawurrung Traditional Owners is reflected in the Borough of Queenscliff Climate Emergency Response plan.

### The Key Points of Concern

1. Adequate Resourcing
  2. Implementation & Integration
  3. Leadership & Governance (Accountability & Responsibility)
  4. Community Engagement and Business buy-in
- Other: Mitigation Plan and Promoting Opportunities

#### 1. Adequate 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, 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. The **Budget** - doesn't match the ambitions laid out in the plan, nor does it mention reprioritising existing funds based on the level of the risk or emergency we face.

#### 2. Implementation & Integration

There is no integration with other COGG plans, so how do you ensure accountability and action by all levels of council. Whose responsibility is it to coordinate the plan and where is the resource? Eg. Staff. No detailed timelines have been provided. The ambition must be measurable, actionable and there must be sufficient funding and integration throughout all COGG plans from 2021 onwards. Every initiative must be measurable and have targets with clear metrics on how this will be measured. This is missing in this plan. 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.

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](#).

SMART objectives - The document reads 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.

Timing of integration in overall council plans: it is not sufficient to implement 'a policy' stating that the Climate Response plan must form part of all future COGG plans, every year

of inaction will have significant impacts to achieving desired and needed targets for the region.

**Prioritise Actions** - The Actions within the Plan need to be prioritised according to cost and impact. It is essential that the plan prioritises best immediate “Bang-for-buck” to reduce emissions immediately rather than place speculative bets on actions which are not yet proven or viable. For example, electrification of all new housing and businesses using renewable energy and improving energy efficiency is already economically viable and effective, whilst investing rate-payer funds in green hydrogen will deliver less immediate reductions in emissions as it is not yet economically viable. 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 regarding the Cities Activity Database, see [here](#).

3. **Leadership & Governance (Accountability & Responsibility):**

It is not clear who is leading and responsible for the delivery of this plan – it should be the CEO.

Other Victorian councils\* strongly and clearly state accountability in their plans:

“This will affect every service we deliver and every team within the organisation. Robust leadership is essential to provide guidance, certainty and strength, and to hold us accountable for ambitious targets. The Shire will lead our community and organisation through the challenges by embodying the Shire’s values of Integrity, Courage, Openness, Respect and Excellence. \*Reference Mornington Peninsula [Climate Emergency Plan](#) (pg 30 – Leadership & Governance)

Other points to consider: Prioritise climate action throughout the organisation, Resource and empower a senior position within Council, Implement a net zero procurement policy for Council purchases, Council-wide climate change education & comms training, Actively divest from Fossil Fuels.

- **Advocacy to state/federal governments** - Given the importance of higher levels of government acting urgently on climate change to support leadership by local government, advocacy to higher levels of government for stronger action must be a high priority. In particular, the plan should state key areas for advocacy, which level of government (State/Federal) and Department the City is seeking to partner with and who within the Council will be responsible for this advocacy role eg staff and/or Councillors/Mayor. 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 federal leaders.

**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 expanding when it is an inferior energy source for residents.

- o 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.

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.

#### 4. Community Engagement and Business buy-in:

How have marginalised groups of the community been engaged in this plan? 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 interested in doing so. A much higher level of engagement with the business sector is required given commercial and industrial emissions are a high percentage of emissions and acting early on climate is an opportunity, whilst acting late will be harmful.

#### Other Points

**What is their mitigation plan** when it comes to Urban growth and climate change? Urban growth projection of 54% of G21 by 2050. Carbon drawdown initiatives need to be included. Mitigation needs to be clearly stated as the priority over adaptation.

We need to lead the community on a **Vision for a better tomorrow, only then will community back and support initiatives on this plan.** **Where in the plan is there a focus on the opportunities?** Renewable manufacture/precinct, Recycling, Blue Carbon.

Promote opportunities - The City needs to be clear and promote what 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 it to work closely with 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. Alternatively, late adoption will result in missed opportunities and economic and social harms as a result as capital moves 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.

#### City of Greater Geelong Climate Response Submissions REFERENCE ARTICLES and SOURCES

#### KEY DOCUMENTS & LINKS

City of Greater Geelong – [Climate Response Plan](https://yoursay.geelongaustralia.com.au/CCRP)

<https://yoursay.geelongaustralia.com.au/CCRP>

Mornington Peninsula – Climate Emergency Response Plan

<https://www.mornpen.vic.gov.au/About-Us/Strategies-Plans-Policies/Strategy-Plan-Listing/Climate-Emergency-Plan> Environmental Impact Statement (main report)

Borough of Queenscliff Climate Emergency Response Plan

<https://www.queenscliffe.vic.gov.au/files/assets/public/documents/your-council/projects/climate-emergency-response-plan/borough-of-queenscliff-climate-emergency-response-plan-final-2021.pdf>