

9 May 2024

Climate Change Authority
GPO Box 787
Canberra ACT 2600

Submitted: consultation@climatechangeauthority.gov.au

Dear Sir/Madam,

Re: 2024 Issues Paper - Targets, Pathways and Progress

On behalf of our members, the Victorian Greenhouse Alliances (VGA) are pleased to provide this response to the Climate Change Authority's (CCA) consultation on its 2024 Issues Paper. The Victorian Greenhouse Alliances are formal partnerships of local governments and statutory agencies driving climate change action across Victoria's municipalities. The Alliances deliver regional mitigation and adaptation programs that provide economies of scale and enable projects typically beyond the reach of individual councils and agencies. Our project work is complemented by targeted advocacy, capacity building and regional partnerships.

We urge the CCA to consider the following recommendations:

1. Adopt science-based targets aligned with limiting warming to 1.5oC and linked to national and sectoral carbon budgets

Australia must do its 'fair share' in the global effort to address climate change, with a rapid transition to zero emissions or below across all sectors. Adopting a carbon budget is the most appropriate way to achieve this and provides the most scientifically robust methodology over a targets and timetable approach. A carbon budget also allows for action to be allocated to specific sectors of the economy. This will be critical for ensuring the credibility of Australia's first Net Zero Plan and that each sectoral plan is driven by individual budget targets and concrete actions, rather than just another set of high-level roadmaps. Diluting a science-based target on the speculative grounds that Australia's export economy might be disadvantaged (or other political justifications) is unacceptable as it will lock the country's emissions trajectory on an unsafe and unliveable climate.

2. Establish a multilevel governance model for setting climate policy and allocating resources towards reducing emissions and adapting to climate change impacts

As the risks and opportunities of climate change become increasingly clear, it is imperative that all levels of government work well together to accelerate the transition to net zero and to strengthen community resilience. To meet this challenge, the current fragmented approach to policy, funding and resourcing must be addressed. The recently released *Many Hands Makes Light Work*¹ report identifies that a new approach to climate governance is required to empower all spheres of government to fulfil their climate ambitions by promoting effective coordination between and across all levels of government.

This 'multilevel governance' approach is intended to turbocharge climate action and give those on the frontlines a seat at the decision-making table. Energy Consumers Australia have made the same recommendation to government in their *Stepping Up*² report, which calls for the creation of a new

¹ Melbourne Centre for Cities, Many Hands Make Light Work final report, July 2023

² Energy Consumers Australia (ECA), Stepping Up: A smoother pathway to decarbonising homes, August 2023 ([link](#))

national partnership across all levels of government with the objective of ensuring an orderly and equitable shift to all-electric homes.

As a first step, we call for the establishment of an 'accord' between the three tiers of government that defines common objectives to strengthen climate mitigation, adaptation and resilience. The accord should also underpin the implementation of the Coalition for High Ambition Multilevel Partnerships for Climate Action (CHAMP) commitments made at COP28.

3. Ensure the additionality of emission reductions from all voluntary action

As currently designed, Australia's policy framework fails to appropriately recognise voluntary action as being additional to Australia's Nationally Determined Contributions (NDC) and obligations under the Paris Agreement. We urge the government to rectify this and ensure voluntary action undertaken by councils and non-state actors should be recognised as over and above the national emissions reduction commitments. Specifically, we recommend the development of an appropriate, transparent, and timely process for reconciling claimed emission reductions from voluntary activities undertaken through related schemes, such as Climate Active and GreenPower (or LGC purchases).

This is particularly important for the 51 Victorian councils who have recently committed to a long-term renewable energy Power Purchasing Agreement (PPA) as a means of reducing their corporate emissions.³ Several of these councils make carbon neutral claims through the federal government's Climate Active program. In its current format, Climate Active allows for the purchase of GreenPower (or surrender of LGCs) to be counted as a carbon reduction measure for organisations wishing to claim carbon neutrality. For carbon accounting purposes, this represents a significant uncertainty as the government has not yet committed to establishing a process for retiring an equivalent number of international units. Failure to do so means that this abatement will occur regardless under Australia's new legislated emissions target. Ensuring the additionality of voluntary action is critical for any organisations making assertions regarding the environmental benefits of their voluntary actions.

The voluntary cancellation of international units is possible under Part 6 of the Australian National Registry of Emissions Units Act 2011. The Act in s 64B(3)(c) allows for the Minister for Climate Change and Energy to direct the cancellation of units for a range of activities, including renewable energy purchases. This process can have a material impact on Australia's emissions trajectory.⁴ This review provides the critical opportunity to retrospectively cancel units from previous years to ensure that voluntary action already taken by councils, businesses and households have made an actual impact on total emissions.

We would welcome the opportunity to speak with you directly regarding this submission and how we can leverage the respective capabilities and resources of all levels of government to ensure the best outcomes for Victorian communities.

Greenhouse Alliances and contacts

- Barwon South-West Climate Alliance (BSWCA), Sue Phillips, Executive Officer, sue.phillips@bswca.org
 - City of Greater Geelong
 - Golden Plains Shire
 - Surf Coast Shire
 - Borough of Queenscliffe
 - Colac Otway Shire
 - Warrnambool City Council

³ The Victorian Energy Collaboration ([VECO](https://veco.vic.gov.au/))

⁴ Renewable energy purchases comprised 3.1% of total consumption in the NEM in 2021, data provided by 1Circle

- Central Victorian Greenhouse Alliance (CVGA), Annika Kearton, Chief Executive Officer, ceo@cvga.org.au
 - o Ararat Rural City Council
 - o Ballarat City Council
 - o Buloke Shire Council
 - o Central Goldfields Shire Council
 - o Gannawarra Shire Council
 - o Greater Bendigo City Council
 - o Hepburn Shire Council
 - o Loddon Shire Council
 - o Macedon Ranges Shire Council
 - o Mildura Rural City Council
 - o Mount Alexander Shire Council
 - o Pyrenees Shire Council
 - o Swan Hill Rural City Council

- Eastern Alliance for Greenhouse Action (EAGA), Scott McKenry, Executive Officer, scott.mckenry@maroondah.vic.gov.au
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 - o Glen Eira City Council
 - o City of Knox
 - o Maroondah City Council
 - o Monash City Council
 - o Stonnington City Council
 - o Whitehorse City Council
 - o Yarra Ranges Council

- Gippsland Alliance for Climate Action (GACA), Tiffany Harrison, Coordinator, tiffany.harrison@gccn.org.au
 - o Baw Baw Shire Council
 - o East Gippsland Shire Council
 - o Latrobe City Council
 - o South Gippsland Shire Council
 - o Wellington Shire Council

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 - o Benalla Rural City Council
 - o Campaspe Shire Council
 - o Greater Shepparton City Council
 - o Indigo Shire Council
 - o Mansfield Shire Council
 - o Mitchell Shire Council
 - o Moira Shire Council
 - o Murrindindi Shire Council
 - o Towong Shire Council
 - o Strathbogie Shire Council
 - o Wangaratta Rural City Council
 - o Wodonga City Council
 - o Alpine Resorts Victoria
 - o Goulburn Broken Catchment Management Authority
 - o North East Catchment Management Authority



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 - o Banyule City Council
 - o City of Darebin
 - o Hume City Council
 - o Manningham City Council
 - o City of Melbourne
 - o Merri-bek City Council
 - o Nillumbik Shire Council
 - o City of Whittlesea
 - o City of Yarra

- South East Councils Climate Change Alliance (SECCCA), Helen Steel, Chief Executive Officer, hsteel@seccca.org.au
 - o Bass Coast Shire Council
 - o Bayside City Council
 - o Cardinia Shire Council
 - o City of Casey
 - o Greater Dandenong City Council
 - o Frankston City Council
 - o Mornington Peninsula Shire Council
 - o City of Kingston
 - o City of Port Phillip

- Western Alliance for Greenhouse Action (WAGA) Fran MacDonald, Executive Officer, franm@brimbank.vic.gov.au
 - o Brimbank City Council
 - o Maribyrnong City Council
 - o Hobsons Bay City Council
 - o Melton City Council
 - o Moonee Valley City Council
 - o Moorabool Shire Council
 - o Wyndham City Council

This letter has been approved through the Greenhouse Alliances governance structures but may not have been formally considered by individual members. The submission does not necessarily represent the views of all members.