



**CONSERVATION
COUNCIL** ACT REGION

Submission to the City and Environment Directorate

Developing the next ACT Climate Change Strategy

18 March 2026

About us

The Conservation Council ACT Region is the peak body for environment and climate groups in the ACT Region. We represent close to 50 member groups, bringing together a united voice on environment and climate issues to Government, business and community.

Since 1981 we have been at the centre of the region's most important wins for wildlife, bushland, climate and communities. As a hub for the ACT Region's environment and climate movement and a not-for-profit, non government organisation, we run campaigns, promote and upskill local groups, undertake research, advocate passionately, and engage and inform our community.

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Executive Summary

The Conservation Council ACT Region (the Council) thanks the City and Environment Directorate for the opportunity to comment on the development of a new Climate Change Strategy for the ACT.

Climate change is the defining challenge of our time and is already a lived reality for Canberrans. Extreme heat events, bushfires and drought conditions will continue to have significant and worsening impacts on our natural environment, economic productivity and community wellbeing.

We remain disappointed by the ACT Government's failure to meet its own legislated interim emissions reduction target of 50-60% by 2025. In this context, the Council, together with many community members and organisations, is dismayed that the Discussion Paper fails to present any new or concrete actions for rapidly achieving net zero emissions in the ACT that could be genuinely discussed and tested. We're also concerned that the Discussion Paper attempts to shift responsibility for climate action onto individuals, with a significant focus of discussion being the need for individuals to step up to achieve our emissions reduction goals. This seems to be a way for the Government to defer responsibility onto the community. A new Climate Change Strategy should outline a clear plan for the ACT Government to adopt a leadership role in advancing the net zero transition and building the social license required for a just and equitable transition within our community.

Developing a new Climate Change Strategy is a critical opportunity to set an ambitious course for the next decade and to demonstrate to Canberrans that the Government is serious about climate action. In May 2019, the Government declared a climate emergency. Yet, the scale of ambition in this Discussion Paper is in no way commensurate with the seriousness and urgency of this declaration. Without stepping up now, the ACT risks losing its standing as a national and international climate leader.

We're advocating for the development of a new Climate Strategy that includes concrete commitments to:

- **Bring forward the commitment to achieve net zero emissions by five years to 2040 at the latest, in line with the recommendation of the [2024 Independent Review of ACT Government Action on Climate Change](#);**
- **Speed up the phase out of fossil fuel infrastructure and significantly increase investment in public and active transport; and**
- **Adapt to the impacts of climate change by improving the design of our urban areas, increasing our urban forest, and ensuring we are prepared for extreme weather events.**

We note the Government's intention to develop short term action plans, spanning two to four years, to support the implementation of the Strategy. We urge that the key stakeholders and the community are engaged on these action plans as soon as possible. Action plans will need to be supported by clear timeframes for achievement, provisions for program monitoring and evaluation, and most critically, a significant uplift in funding across a number of Government portfolios.

Without an urgent and significant increase in funding for targeted emissions reduction and adaptation measures within the 2026-27 ACT Budget and future Budgets, a Climate Change

Strategy for the ACT will remain empty words. In particular, we urge the Government to provide greater resourcing for key community sector and environmental organisations already undertaking critical work to support community resilience, mitigation and adaptation in the ACT.

The Council welcomes further opportunities to engage with the ACT Government on the Strategy and action plans.

Embedding equity, wellbeing and resilience

The Council welcomes the inclusion of embedding equity, wellbeing and resilience in a new Climate Strategy for the ACT and calls for these principles to be translated into clear, measurable actions in the final Strategy. A new Climate Change Strategy must include consideration of the disproportionate impacts of climate change on vulnerable members of our community, including persons experiencing socio-economic disadvantage, migrants, women, children, persons with disabilities and older people. To this extent, the Council supports the recommendations of the ACT Council of Social Service in relation to ensuring the energy transition and climate adaptation is fair and equitable for vulnerable groups in our community.

In addition, the Strategy should explicitly recognise intergenerational equity in line with the International Court of Justice's 2025 landmark advisory opinion on climate change. Recognising intergenerational equity is a critical element to ensure the government is accountable to young people and future generations when making decisions that impact the ACT's response to the climate emergency.

Furthermore, considering the increasing risk of climate-driven disasters in our region, the Council considers the Strategy should also include specific reference to disaster resilience and commit to tangible actions to reduce the impacts of climate-related disaster risks. For example, this could include establishment of an Extreme Weather Resilience Team responsible for ensuring government, business and community arrangements (for instance, alerts, 'climate-safe' rooms, refuges, volunteer efforts and medical support) are in place during climate-driven extreme weather events.

The Council welcomes the inclusion of wellbeing as a principle in the Strategy. In the operationalisation of wellbeing, we advocate for the specific inclusion of health metrics to ensure that actions to address climate change also create positive health outcomes, and that our healthcare systems can adapt to increasing climatic extremes.

Recommendations

- **Fund key ACT environmental and community sector organisations supporting community resilience and adaptation to climate change.**
- **Establish an Extreme Weather Resilience Team to coordinate Government, business and community preparedness efforts (i.e providing alerts, climate-safe rooms, refuges, volunteer efforts and medical support) to prioritise the health and safety of all community members during extreme weather events.**
- **Improve energy efficiency and climate resilience in public facilities by 2030, including public schools, playgrounds and community centres.**
- **Include explicit consideration of intergenerational equity in the new Strategy, in**

line with the International Court of Justice's 2025 landmark advisory opinion on climate change.

- **Include age-appropriate climate education as part of the school curriculum so that children are empowered with the knowledge needed to navigate their future, including mitigating and adapting to the impacts of climate change.**

Transport

The Council continues to advocate for a rapid shift to a zero-emissions transport system, as outlined in our [Sustainable Transport Policy](#).

The solutions to reducing ground transport emissions are well-established: increasing the proportion of people using active travel and public transport, and reducing reliance on single occupant private vehicles. The Council is disappointed that the Discussion Paper presents no new commitments from the ACT Government to invest in the public transport network, active travel infrastructure, or measures to encourage the transition to electric vehicles. The community has made clear what solutions are needed - what is required now is the ambition and courage to act.

The Council calls on the Government to fund and implement an integrated transport strategy for Canberra that prioritises moving people safely, protects the environment, drives down emissions, and maintains liveability and equitable access. The Government should also establish a Ministerial Advisory Council on Transport to work with key stakeholder groups to jointly promote zero-emissions transport and monitor implementation of a transport strategy.

The ACT Government should further prioritise active travel by ensuring that cycling and walking are safe and convenient for all Canberrans. This could be achieved by implementing a number of quick and low cost measures, in addition to sustained investment in upgrading and building the active travel network. For example, rapidly implementing segregated bike lanes on existing roads and trialling 30km/hr speed limits on roads without segregated footpaths and around schools are practical, lower cost measures that would improve safety and encourage mode shift.

Public transport must rapidly increase its ride share if emissions targets are to be met. New developments must be planned around public transport so that new residents are not dependent on private vehicles from the outset. This requires both infrastructure investment and the incorporation of new routes that deliver the frequency and reliability needed to drive public transport adoption. In particular, the Council urges the Government to maintain continuity in light rail construction, as pauses between stages result in the loss of workforce capability and construction momentum. The Government should also ensure that access to public transport is effectively supported through adequate pavements, crossings and shelter. The best public transport will be underutilised if getting to it is inaccessible, uncomfortable or dangerous.

Electric vehicles are an important part of reducing transport emissions, and the ACT's higher rates of adoption are promising. The Council commends the Government for its adoption of electric buses, and calls on the Government to increase the rate of transition and commit to all buses operating on 100% renewable energy by 2035. The Government should also draw on its

operational experience to support ACT businesses in transitioning their commercial fleets to electric vehicles.

Recommendations

- **Deliver an integrated and electrified bus and light rail network with a frequent, reliable seven-day service, with particular emphasis on accelerating light rail construction.**
- **Legislate a target of 50% of all commuting journeys by active and public transport by 2035.**
- **Upgrade and build the missing links in Canberra's active travel network by 2028, as per Priority Two of the ACT Government's [Active Travel Plan](#).**
- **Commit to all buses operating on 100% renewable energy by 2035.**
- **Implement vehicle registration regulations that preference small, zero-emissions vehicles**

For additional recommendations, see the Council's [Sustainable Transport Policy](#).

Natural Environment

Climate change is already having significant impacts on biodiversity in the ACT, including structural changes to alpine ecosystems, reduced stream flows and the impacts of more frequent and severe bushfires on fire sensitive species. Protecting and restoring our natural environment in the face of climate change is more important than ever, and will be critical for ensuring the survival of threatened species, emissions reduction and to support adaptation.

The Council is dismayed that the language used in this section of the Discussion Paper is vague and includes no new concrete actions to protect and restore our natural environment. References to 'planting more trees' and 'improving waterways' as next steps offer little beyond what has already been articulated in previous Government policy. For instance, the Discussion Paper fails to address that the ACT is not on track to meet its own target of 30% canopy cover by 2025 under [Canberra's Living Infrastructure Plan](#). Indeed, the [2025 Urban Tree Coverage Report](#) shows canopy cover has declined from 22.7% to 21.8% between 2020 and 2025. Compounding this, trees protected under the Urban Forest Act continue to be removed, and the Government has not adequately accounted for accelerating tree loss under heat stress in a warming climate in its targets. Similarly, the Discussion Paper presents no meaningful actions to improve or restore the ACT's waterways. The new Strategy should include actions to progressively upgrade and re-naturalise creeks and stormwater channels, including the reinstatement of plans to re-naturalise Sullivan's Creek, particularly noting the significant benefits urban waterways have in reducing the urban heat island effect.

The Council welcomes the release of the new draft [Nature Conservation Strategy](#), particularly the inclusion of a [Supplement on climate adaptation](#). This supplement outlines the intention to adopt the resist, accept, direct framework, which we understand is best practice for building understanding and thereby taking control of environmental management interventions in a changing climate. We call on the Government to fully implement and fund the new Nature Conservation Strategy, including the development of a Nature Conservation Network, to ensure critical areas of biodiversity are protected and restored in the face of climate change.

Recommendations

- **Meet the 30% urban forest canopy cover target by 2045.**
- **Progressively upgrade and re-naturalise existing major creeks and stormwater channels, including reinstating plans to re-naturalise Sullivan’s Creek.**
- **Implement and fund the newly released Nature Conservation Strategy, including the development of a Nature Conservation Network to protect our biodiversity beyond formal protected areas.**
- **Improve and properly resource management of waterways, including:**
 - **Enforcing the Water-sensitive urban design guidelines as compulsory for all urban developments.**
 - **Further incorporating First Nations practices into management of urban lakes and waterways.**
 - **Providing secure, ongoing funding to community groups working on catchment management, water quality testing, ecological surveys and public education and engagement.**
 - **Progressively upgrading and re-naturalising existing major creeks and stormwater channels.**

Energy & Built Environment

While the ACT’s adoption of a 100% renewable energy supply is to be commended, fossil fuel gas emissions were the ACT’s second largest emissions source in 2024-45, with some 139,000 households and buildings reliant on gas¹, largely for heating and cooking. Without significant Government commitment and investment to address the structural barriers to electrification, the ACT risks falling further behind on its legislated emissions targets. We urge the Government to step up its ambition in the new Climate Strategy, and bring forward its commitment to phase out gas by five years to 2035; while investing in accelerating electrification of our households, businesses and transport. In addition, practical measures such as expanding the Home Energy Support Program to directly fund electrification for low-income and vulnerable households will ensure that the most vulnerable members of our community are not left behind in the transition.

The Council urges the new Strategy to significantly strengthen its focus on adaptation, particularly in the built environment. As climate impacts intensify, houses and public infrastructure must be designed for the climate conditions we are moving into, not those of the past. For example, the Government could provide targeted financial support to low income households to support simple fixes that improve energy efficiency and reduce heat loss, such as draught sealing and topping up insulation. A new Strategy should also mandate minimum energy efficiency standards in rental homes to meet 7 stars; and ensure the ACT’s compliance procedures for sustainable buildings standards meet or exceed best practice amongst states and territories.

Recommendations

- **Bring forward the commitment to phase out gas by five years to 2035 and invest in accelerating electrification, including by:**

¹ <https://new.gbca.org.au/news/gbca-news/gbca-applauds-act-governments-integrated-energy-plan/>

- **Banning the installation of new gas connections and appliances, or replacement of a gas appliance with another gas appliance.**
- **Expanding the Home Energy Support Program to directly fund electrification for low-income and vulnerable households.**
- **Strengthening minimum energy efficiency standards to require all rental homes to meet 7 stars by 2035 (matching the NCC standard for new buildings).**
- **Funding the electrification of all ACT Government assets, including social housing, schools and community centres.**
- **Increasing the uptake of solar power, battery and energy monitoring systems, including:**
 - **Installing solar power systems on all social housing and suitable ACT Government facilities**
 - **Requiring all existing commercial and multi-unit residential buildings to install solar power systems, wherever practicable, by 2035**
 - **Wherever possible, making these installations “smart” as investments in a resilient, efficient, multi-flow electricity network**
- **Financially supporting low income households to invest in energy efficient and climate resilient home improvements.**
- **Ensure the ACT’s compliance procedures for sustainable buildings standards meet or exceed best practice amongst Australian states and territories.**

For additional recommendations, see the Council’s [Climate Policy](#).

Government

Approaches to addressing emissions from Government services, operations, and assets in the Discussion Paper are vague and characterised by the use of aspirational phrases. In addition to the recommendations in this submission relevant to Government operations and assets, including the electrification of the bus network and the electrification of social housing, schools and community centres, a new Climate Strategy should include a commitment to publish carbon footprints and climate risk assessments specifically related to government operations. In addition, the Government should establish a permanent, dedicated governance entity responsible for climate risk assessment, emission accounting, monitoring and reporting, and cross-sectoral cooperation across the government directorates.

Recommendations

- **Publish carbon footprints and climate risk assessments related to government assets and operations.**
- **Establish a permanent, dedicated governance entity responsible for climate risk assessment, emission and adaptation accounting, monitoring and reporting, and cross-sectoral cooperation across the government directorates.**
- **In the ACT’s Sustainable Procurement Policy, require suppliers to screen their supply chains to exclude companies and institutions that invest in fossil fuel projects.**

Other emissions

The Discussion Paper identifies ‘Other’ sources of emissions as emissions from FOGO (food organics and garden organics), waste emissions, aviation and scope 3 emissions. Despite scope 3 emissions accounting for 93.6% of the ACT’s total carbon footprint ², the Discussion Paper downplays their role and does not propose actions that address the recommendations of the independent Office of the Commissioner for Sustainability and Environment’s [report into Scope 3 Greenhouse Gas Emissions in the ACT](#). The report recommended that the ACT Government set scope 3 emissions reduction targets; implement a 50% food waste reduction by 2030 target in the FOGO program; and to review and expand legislation and to develop and implement education campaigns for residents on reducing household scope 3 emissions. The Council calls on the Government to implement the recommendations of this report in the next Climate Change Strategy.

The Council notes that the rollout of the FOGO program and the development of a new FOGO processing facility has been significantly delayed; and remains disappointed that the Discussion Paper offers no new actions to fulfil this outstanding commitment. The Council calls on the Government to rapidly expand the FOGO program and invest in the appropriate processing facilities.

Lastly, we note the Government has not referenced the emissions impacts of wood-fired heaters in the Discussion Paper, both in regards to direct emissions, and the potential impacts on local native forests, which act as carbon sinks. The Government should prioritise urgently phasing out wood fired heaters in all ACT suburbs and encourage their replacement with electric alternatives, including through accessible financial support and rebates for lower income households.

Recommendations

- **Implement all recommendations by the Office of the Commissioner for Sustainability and the Environment for reducing Scope 3 emissions**
- **Rapidly expand the FOGO pilot program to all suburbs**
- **Speed up the phase out of wood fired heaters**

² Office of the Commissioner for Sustainability and the Environment, 2021, Scope 3 Greenhouse Gas Emissions in the ACT, published by the Office of the Commissioner for Sustainability and the Environment, Canberra, 2021.