



**CONSERVATION
COUNCIL** ACT REGION

Submission to ACT Legislative Assembly Standing Committee on Environment, Climate Change and Biodiversity

Climate change and a just transition

February 2024

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

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Introduction

The Conservation Council ACT Region appreciates the opportunity to provide comments to the ACT Legislative Assembly Standing Committee on Environment, Climate Change and Biodiversity regarding climate change and a just transition.

The inequities and injustices of climate change operate at local as well as international levels. With inequality widening both between and within communities (including Australia's capital city), it is critical that actions to address climate mitigation and adaptation do not inadvertently worsen these inequities. Indeed, actions to mitigate and adapt to climate change have an incredible potential to deliver multiple benefits to Canberrans if they are designed with social equity as a prioritised guiding principle. For example, upgrading the ceiling insulation of a home reduces the energy required to heat and cool it which results in less energy demand and greenhouse gas emissions from the national energy market; improved comfort and health and lower energy costs for the occupants which reduces public health burden and frees income for other purposes; improved property value for the owner; and employment opportunities for insulation installers.

The Conservation Council always advocates for climate and environmental policies to explicitly consider the social equity impacts of regulation, programs and funding. The Australian Council of Social Services recently called on the Australian Government to amend the *Climate Change Act 2022* to include objectives, principles and processes to guide a fair, equitable and inclusive transition.¹

"The amendment should:

- *Ensure fairness and equity inform the development of policies, programs or processes to achieve Australia's emissions reduction targets;*
- *Acknowledge a duty of care to protect younger people and future generations from climate change; and*
- *Require the engagement and self-determination of impacted groups in policy development. This includes marginalised communities at greater risk, First Nations Peoples, people living with disabilities, migrants, people experiencing poverty, children, older people and women."*

The Council highlights the principles of self-determination, intergenerational justice and climate justice. Empower people to contribute to policy and program development on their own terms rather than making assumptions and decisions for them. Consider the needs of future generations. And, by taking fair and urgent action now to mitigate the ACT's greenhouse gas emissions (all scopes), we start to address the injustices of this wealthy Territory's disproportionately high contribution to climate change and its impacts on communities beyond our borders. Cities are increasingly integrating equity and justice into climate action plans.²

On specifics of social equity in policy and program design, the Conservation Council respects and defers to representative bodies including the Australian and ACT Councils of Social

¹ ACOSS, 2023, 'Joint statement calling for fair, fast and inclusive action on climate change',

<https://www.acoss.org.au/joint-statement-calling-for-fair-fast-and-inclusive-action-on-climate-change/>

² Boston University, 2021, Justice in urban climate plans: how and where cities are integrating equity and climate,

<https://www.bu.edu/ioc/2021/11/01/justice-in-urban-climate-plans-how-and-where-cities-are-integrating-equity-and-climate/>

Services, Councils on the Ageing, the Ministerial Advisory Council for Multiculturalism and country-specific associations, Indigenous representatives, and Diversity Councils, as well as Better Renting and Tenants' unions. We recommend that the Committee consult these and other social advocacy groups to ensure diverse perspectives are encompassed.

How can the ACT make a just transition to ensure that all Canberrans get the benefits and protections of climate action?

That the Integrated Energy Plan includes the principle of prioritising a “fair and equitable transition” and the ACT Legislative Assembly is asking this question is a good start. To “get the benefits and protections of climate action”, all Canberrans need to take climate action, or have it taken for them, to an equitable standard across the population.

The most common and likely impacts of climate change are fairly well-understood: heat, severe storms, drought, fires, flooding etc, that have deleterious effects on people's housing and health. The Committee will be aware that the people most vulnerable to these impacts are those with health conditions or disabilities, on low incomes, in social minorities, in poor quality housing or business premises, those participating in outdoor employment, people with less fluent English language or who are not being reached by Government communications, and so on. The intersection of multiple factors can deepen the disadvantage and vulnerability. Generally, there is a strong overlap between the people who are most exposed and vulnerable to climate impacts and those who have little power or capacity to take action to protect themselves from these impacts. Their energy costs increase, their health deteriorates, and they become trapped in a vicious cycle of disadvantage.

By contrast, it is generally assumed that climate action, such as home energy efficiency measures or electrification of fossil fuel appliances and vehicles, is most easily undertaken by people who own their own free-standing home and have high disposable income capacity. These people then have greater resilience to the impacts of climate change and also reap the economic and health benefits of having a more energy-efficient home.

Become aware of biases, particularly the unconscious assumptions and worldviews held by the decision-makers. Be deliberately inclusive. Who are the decision-makers? Who is being invited to participate in the policy development process? Is the process itself inclusive and representative or does it suit only selected demographic groups?

Understand the ACT's demographics. According to the 2021 Census,³ for instance, 33% of Canberra residents were born overseas and more than half of the ACT's population have one or both parents born overseas with India, England, China, Nepal and the Philippines being the most common places of birth. 27% of Canberra households use a language other than English, with Mandarin, Nepali, Vietnamese, Punjabi and Hindi being the most common. 30% of the population rents their home, and more than 35% live in a (semi-attached) townhouse or apartment. Nearly 40% of Canberrans have a long-term health condition and 9.7% are aged 70 years and over. These are some examples of the potentially vulnerable groups.

³ Australian Bureau of Statistics, 2021, 2021 Census All persons QuickStats: Unincorporated ACT, Area code LG89399, accessed 14 February 2024, <https://www.abs.gov.au/census/find-census-data/quickstats/2021/LGA89399>

Policy developers need to actively seek the views of potentially marginalised people, especially when they do not respond to mainstream generalised advertising of consultation processes.

Political unity and non-partisan commitment to long-term policy goals are critical to people's confidence to invest in expensive upgrades to homes, vehicles and behaviour changes.

Through our Make the Switch project community engagement, the Conservation Council frequently hears comments such as "what's to stop the Government changing its mind in 10 years time?".

A. The effectiveness, efficiency and equity of programs and rebates to reduce emissions, increase energy efficiency and help the transition to electrification

Through our Make the Switch project community engagement, the Council has heard the ACT Government's Sustainable Household Scheme zero-interest loan described as "middle-class welfare", along with comments such as "rich people don't need Government subsidies to buy a Tesla". While the Council supports the continuation of this scheme, the Government must ensure that the SHS is complemented by other programs that assist those households who do not qualify for or who lack the capacity to participate in the SHS.

A zero-interest loan still places the cost burden of electrification on households, plus the sheer complexity of the process can seem overwhelming or even impossible for many people. Rewiring Australia recommends that Governments directly invest in insulation and electrification of Australian households (including installing rooftop solar and battery systems and electric vehicle charging) like they invest in large-scale energy infrastructure. Instead of thinking about household electrification programs as social support programs with rebates and loans, it could be funded from the energy budget, in partnership with electricity network operators and energy retailers. This would directly purchase distributed energy and storage as well as emissions reductions whilst reducing the need for investment in large-scale generation and storage projects.

A systematic approach to insulating and electrifying (including rooftop solar, battery and EV charging) the homes of all vulnerable Canberrans, including every public and social housing dwelling, by 2030 should avoid leaving anyone behind and ensure that all Canberrans enjoy the benefits of electrification. The Government needs to compel landlords and strata managers/owners to electrify homes and apartments.

Government should collaborate with research institutions, industry representatives and social advocacy representatives to conduct **systems analysis** using tools such as causal loop diagrams to model the effects of different incentives, regulations, communications etc. This can help to identify possible perverse outcomes such as social inequity, increased uptake of wood fires or bottled gas, declining values for gas-powered homes, so that these can be addressed early. It can also help identify positive reinforcing behaviours that could be amplified, such as peer-to-peer or expert-to-customer communications.

Please find more detail in the Conservation Council's recent submissions regarding the ACT's Integrated Energy Plan⁴ and the Senate Standing Committee on Economics inquiry into residential electrification⁵.

B. Skills, training and programs to support the workforce skills and job-readiness required to transition to electrification and decarbonisation

As detailed in the Council's previous submissions, Government could:

- Increase funding for apprenticeships at least to parity with neighbouring NSW
- Raise awareness of career paths for young people
- Raise awareness of career opportunities for mature people to retrain from other sectors, which might require subsidisation of pay for parity and fast-tracking of training and qualification
- Include electrical training and licensing within plumbing training and licensing, including integrating training for HVAC split systems and refrigerants for more crossover of skill sets between trades
- Offer a restricted gas disconnection license to electricians so that they can perform simple gas appliance disconnections when engaged to install a new electric appliance (eg, an induction cooktop). This will reduce cost for consumers by not having to separately engage a gasfitter for this basic task.
- Offer fast-track training and qualification in electrical trades for anyone already licensed in related trades (eg, plumbing, gas-fitting, HVAC, etc)
- Require mandatory update (short course) training in new electrical technologies and the energy transition pathway for all licensed gas-fitters, plumbers, electricians, builders, architects and related trades, i.e. compulsory professional development, funded through tax credits to offset loss of productivity for training hours. Mandatory training would level the playing field across all businesses and ensure consistency across the electrification ecosystem (i.e. up-to-date knowledge of current technologies and consistency in the advice passed on to customers). Some of this training content could potentially be delivered online, eg, through self-paced online modules like the "I'm alert" food safety certificate.
- Similar mandatory professional development training could be required for other property-related professionals such as real estate agents.

C. Any other related matters

Many climate actions can be undertaken by the Government in public spaces (such as planting trees to provide cooling shade) or in Government-owned facilities (such as energy efficiency measures that improve worker comfort). For instance, electrification then turnover of the ACT Government vehicle fleet will help to increase supply of second hand electric vehicles in the local market. If this is then also supported by programs and funding that prioritise low-income

⁴ Conservation Council ACT Region, 2023, Submission to ACT Government re Integrated Energy Plan Position Paper,

https://conservationcouncil.org.au/wp-content/uploads/SUBMISSION_CCACTR-IntegratedEnergyPlan-Sep2023.pdf

⁵ Conservation Council ACT Region, 2023, Submission to Senate Standing Committee on Economics re residential electrification,

https://conservationcouncil.org.au/wp-content/uploads/SUBMISSION_CCACTR-ResidentialElectrification-Sep2023.pdf

households, it could accelerate the removal of the oldest and most polluting vehicles while relieving fuel and other vehicle ownership costs.

Legislation such as an enshrined human right to a healthy environment and expanded implementation of the ACT Wellbeing Framework are critical to provide high-level, population-scale protections through which other legislation is then filtered. See the Council's submission regarding the Human Rights (Healthy Environment) Amendment Bill.⁶

Government must continue to set the standards for Canberra's business owners to comply with to reduce emissions whilst protecting employees, such as through electrification of vehicle fleets and climate-resilient buildings.

Reduce scope 3 emissions with urgency as recommended by the ACT Commissioner for Sustainability and the Environment.⁷ This should be complemented by implementing the ACT Circular Economy Strategy and Action Plan 2023-2030.

The single most effective action we can take to mitigate climate change and reduce its future impact on Canberrans is to call on the Australian Government to immediately cease approving new fossil fuel projects and expansions and publish a comprehensive plan to phase out all existing fossil fuel mining and consumption by 2050 or sooner. The ACT Government should also urge the ACT's federal representatives to pass the Climate Change Amendment (Duty of Care and Intergenerational Climate Equity) Bill 2023 which is being considered by the Senate Environment and Communications Legislation Committee (due to report 1 March 2024).

Summary and Recommendations

The Conservation Council recommends that the ACT Government:

- Develop by the end of 2024 a framework/plan for the proactive, strategic transition and phase out of the gas network with targets and a timeline commensurate with the urgency of the climate science and IPCC warnings.
- Invest directly in electrifying the homes of Canberra's vulnerable, low-income and social housing residents as a priority, aiming to complete this work by 2030.
- Consult with a wide range of social advocacy groups.
- Provide policy certainty to give Canberrans confidence to invest in the transition.
- Call on the Australian Government to immediately cease approving new fossil fuel projects and expansions and publish a comprehensive plan to phase out all existing fossil fuel mining and consumption by 2050 or sooner.

⁶ Conservation Council ACT Region, 2023, Submission to Standing Committee on Justice and Community Safety re Human Rights (Healthy Environment) Amendment Bill 2023, <https://conservationcouncil.org.au/wp-content/uploads/Inquiry-into-the-Human-Rights-Healthy-Environment-December-2023.pdf>

⁷ Office of the Commissioner for Sustainability and the Environment, 2021, *Scope 3 greenhouse gas emissions in the ACT: an investigation of current scope 3 emissions and potential future reductions*, <https://envcomm.act.gov.au/latest-from-us/acts-scope-3-greenhouse-gas-emissions/>