



24 May 2022

Independent Panel

Victorian Government Interim Greenhouse Emissions Target 2035

Mr Martijn Wilder AM, Ms Emma Herd, Mr Tennant Reed

climate.change@delwp.vic.gov.au

Dear Mr Wilder, Ms Herd, and Mr Reed,

Victorian Government's request for Submissions: Interim Emissions Target

On behalf of our members, the Victorian Greenhouse Alliances (VGAs) thank the Victorian Government for the opportunity to make a submission to the Independent Expert Panel to re-confirm our support for the adoption of a strong interim emissions reduction target for 2035. This is likely the last opportunity the Victorian Government will have to keep Victorian communities safe and warming at or below 1.5°C, as the scientific research now shows the pace of warming will lead to a 1.5°C world by or before 2030.

The VGAs' recommendations have been considered under the principles of effectiveness, economic efficiency and equity. Most recommendations in this submission are directly drawn from our experience of implementing carbon mitigation projects, and the stark experiences of addressing the major climate change impacts resulting from a median warming temperature increase of 1.2°C.

In 2017 Victoria signed the Climate Leadership Declaration¹, committing the State to keep warming below 1.5°C. This commitment and associated emissions reduction targets are crucial to Victoria avoiding the worst impacts of climate change.

In 2019 Victoria's Independent Expert Panel recommended greenhouse gas emissions reduction targets of:

- 32-39% below 2005 levels in 2025 and
- 45-60% below 2005 levels in 2030.

However, the 2019 Panel's report stated that a target of 67% below 2005 levels in 2030 was necessary 'to secure an even chance of limiting warming' to 1.5°C². In their submission of 21 July 2019, the Victorian Greenhouse Alliances therefore recommended a strong reductions trajectory to ensure economic signals to business and households would generate a smooth transition as early as possible. The VGAs reaffirm their position for a strong reduction trajectory in this submission.

The Victorian Government through the Climate Change Act 2017 is committed to greenhouse gas emissions reduction targets of:

- 28-33% below 2005 levels in 2025 and
- 45-50% below 2005 levels in 2030.

¹ https://www.climatechange.vic.gov.au/__data/assets/pdf_file/0019/74107/Climate-Leadership-Declaration-2017.pdf

² Panel report, Box ES2. Considering interim targets and trajectories for a 1.5C world, p 12



These targets, even if accomplished, will not be enough for Victoria to do its part to limit global warming to 1.5°C.

The most recent Working Group III contribution to the Sixth Assessment Report (AR6) of the Intergovernmental Panel on Climate Change (IPCC), which covers literature accepted for publication to 11 October 2021, states:

"Without a strengthening of policies beyond those that are implemented by the end of 2020, GHG emissions are projected to rise beyond 2025, leading to a median global warming of 3.2 [2.2 to 3.5]°C by 2100."³

In the IPCC 2018 report Global Warming of 1.5°C⁴ it is made clear with "high confidence" that in less than eight years, by 2030, we will be living in a 1.5°C world (p.4).

The exhaustive, science-based modelling in the IPCC AR6 Report emphasises the recent and harrowing experiences of our own Victorian communities, who even in the last two years have endured fatal wildfires (2020), flash floods (2021), intense wind and storm events (2021), and severe drought (2019-2021). If these experiences are to be amplified three-fold in less than 80 years, local governments, communities and the biodiverse environments that support them, will be facing a world that is dangerously unliveable.

The experience of our member councils demonstrates that acting on climate change has had a remarkable and positive galvanising effect on communities both economically and socially, over the last 24-48 months. The 2035 interim target is an ideal gateway to capitalise on this unity. In decisively tightening targets to limit warming, the Government will send the right signals to community, industry and service providers, so that all are able to prepare for this major transition in a timely fashion. That Victoria has exceeded its early target demonstrates there is an appetite to mitigate and check climate change impacts while there is still time.

This submission recommends that the Victorian Government:

1. act decisively now to limit warming to 1.5°C
2. soften economic shocks to the State through rapid early decarbonisation, rather than leaving large portions of mitigation to post-2030, when we know the impacts of warming and extreme events will be depleting Victoria's natural resources;
3. Adopt science-based targets that are in line to limit temperature rises to 1.5 degrees Celsius, whereby the Government:
 - a. adjusts the current 2030 interim target to be at least 75% reduction from 2005 emissions levels (currently 45-50%);
 - b. brings forward Victoria's zero net emissions commitments from 2050 to 2035; and
4. Set carbon budgets for individuals and organisations to pledge and work to, and be verified against.

This recalibration of Victoria's targets would leave 13 years until 2035 for Victorians to achieve net zero - a challenging but achievable figure that can be delivered with a particular focus on:

- Continuing to rollout renewable energy across the state, including embracing its off shore wind resources to make it Australia's renewable energy superpower;

³ IPCC, 2022, Climate Change 2022: Mitigation of Climate Change, Summary for Policymakers, p SPM-21

⁴ IPCC, 2018: Summary for Policymakers. In: *Global Warming of 1.5C. An IPCC Special Report on the Impacts of global warming of 1.5C above pre-Industrial levels and related global greenhouse gas emission pathways*



- Accelerating the state's transition off gas;
- Transitioning our transport systems to be fully electrified and/or powered by green hydrogen; and
- Prioritising a decarbonised Victorian agricultural sector, including the support of zero methane agriculture, localised sequestration markets, and sustainable land management.

This submission is from the Victorian Greenhouse Alliances, which represent 65 local governments, plus catchment management authorities, and Victoria's Alpine Resorts.⁵ Key aspects we wish to communicate to the Panel as evidence backing our four recommendations above include;

- **This is likely our last opportunity to do everything we can to limit warming to 1.5°C.** Updated science-based modelling demonstrates that emissions targets need to be stronger. Whilst Victoria's Independent Expert Panel recommended greenhouse gas emissions reduction targets 45-60% below 2005 levels by 2030, research⁶ since then, highlights that targets need to be increased and brought forward to avoid >1.5°C of warming.
- **Local governments as frontline decision-makers, have a vested interest in proactively and equitably minimising the climate risk to future local communities.** Local government is the tier of government closest to communities, and is consequently responsible for on-the-ground prevention, adaptation and transition, and most are ill-equipped to address the increased legal, financial, and employment complexity generated from >1.5°C of warming.
- **The Victorian Greenhouse Alliances have proven the extensive economic returns of mitigation, and positive impacts in social and cultural domains, as well as the environment.** Independent evaluation of projects taken by Alliances demonstrates that councils secure net benefits of up to 8 times their initial investments.⁷ Only half of our investments are able to physically return a saving (ie some projects are feasibility studies), revealing that rapid, carefully managed implementation offers a powerful economic case for adoption.
- **Higher targets are achievable.** The Victorian Greenhouse Alliances emerged from local government some 22 years ago and have implemented many of Victoria's largest abatement projects. These include the Victorian Energy Collaboration which involved some 1,000 decision-makers from 46 local councils across the state, and has resulted in an annual emissions abatement of 260,000 tCO₂-e. This enormous achievement adds to other major abatement achievements, and has been accomplished despite our very modest resourcing.
- **Many Victorian councils, and most Victorian SMEs, are in the dark about their emissions and are eager to establish a carbon budget.** A 'carbon budget' is an easy way to understand carbon emissions and keep within an acceptable range. But local governments and businesses, particularly in regional areas, need a trustworthy budgeting tool to assist their transition. Keeping to the global carbon emissions budget of 355-370 gigatonnes CO₂-e equates to a 50% chance of keeping warming to 1.5°C. With the world currently increasing its emissions beyond 42 gigatonnes per year, this budget will be exhausted by 2030. Unfortunately, Victorians have one of the highest annual carbon emissions per capita globally (13.8 tonnes CO₂-e⁸). To "keep to budget" Victorians need to work with an annual budget of around half a tonne of emissions per person per year. We need transparent, trusted methods of seeing our diminishing carbon budget so we can act – as a State, as local governments, as sectors, and as decision-makers.

⁵ Note: a diversity of targets have been adopted by councils across the state ([see summary](#))

⁶ *ClimateWorks Australia, 2020, Decarbonisation Futures: Solutions, actions and benchmarks for a net zero emissions Australia*

⁷ https://eaga.com.au/about/our_impact/

⁸ DELWP, 2019, *Victorian Greenhouse Gas Emissions Report* (p12)



- **Changes to how the Victorian *Climate Change Act 2017* applies to land use planning has potential to create major emissions reductions and more resilient communities.** Land use planning is core business for local government. There is a clear disconnect between high level policy positions on climate change, both by State and local government, and the day-to-day decisions that are being made. This is particularly true for planning decisions, which influence carbon emissions and the living conditions of communities for generations to come. To enable the delivery of a safe climate and resilient communities the Victorian Government must mandate tackling climate change as a priority at all levels of the planning system This would empower our local governments, decision-makers, and developers to get on with the job of developing land *with* climate change in mind. It will also wipe hundreds of thousands of tonnes of avoidable CO₂-e emissions off Victoria's inventory. The Greenhouse Alliances have already undertaken a substantial, and extensively consulted gap analysis of Victoria's planning system⁹, and have prioritised recommended changes, including legislative amendments, for the Victorian Government.

We look forward to reviewing the Government's response to this consultation. We would also welcome an opportunity before the response is tabled to meet with you, to discuss our proposals for how the Victorian Government can draw from and support the extensive expertise in mitigation that has been built over time by Victoria's Greenhouse Alliances.

If you require further information, please do not hesitate to contact any of the Victorian Greenhouse Alliance Executive Officers listed.

Kind regards

Carole Hammond
Executive officer, Goulburn Murray Climate Alliance
On behalf of the Victorian Greenhouse Alliances

⁹ https://www.naga.org.au/uploads/9/0/5/3/9053945/final_report_-_climate_change_and_planning_in_victoria_-_november_2021.pdf



Victorian Greenhouse Alliance Executive Officer Contacts

- Carole Hammond, Executive Officer, Goulburn Murray Climate Alliance (GMCA) | email eo@gmca.org.au
- Annika Kearton, Chief Executive Officer, Central Victorian Greenhouse Alliance (CVGA) | email ceo@cvga.org.au
- Scott McKenry, Executive Officer, Eastern Alliance for Greenhouse Action (EAGA) | email scott.mckenry@maroondah.vic.gov.au
- David Meiklejohn, Executive Officer, Northern Alliance for Greenhouse Action (NAGA) | email david@naga.org.au
- Daniel Pleiter, Acting Executive Officer, South East Councils Climate Change Alliance (SECCCA) | email dpleiter@seccca.org.au
- Fran MacDonald, Executive Officer, Western Alliance for Greenhouse Action (WAGA) | email franm@brimbank.vic.gov.au
- David Collins, Chair, Barwon South West Climate Alliance (BSWCA) | email david.collins@gplains.vic.gov.au

Municipal Association of Victoria contact:

- Claire Dunn, Manager – Built & Natural Environment, Municipal Association of Victoria (MAV) | email cdunn@mav.asn.au

The submission has been approved through the greenhouse alliances' formal governance structures but has not been formally adopted by individual members. The submission does not necessarily represent the views of all councils. In the event that individual councils have positions that go beyond this submission, they may provide additional feedback.