

Independent review of ACT Government action on climate change

Final report

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Prepared for Environment, Planning and Sustainable Development Directorate (EPSDD)

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Cover image: 'Sunrise over Black Mountain', April 2020, www.ephotozine.com/photo/sunrise-over-black-mountain--canberra-59378544

Executive summary

In mid-2024, Rooftop Social and the Institute for Sustainable Futures (ISF) at the University of Technology Sydney were engaged to review the ACT Government's action on climate change. This review was mandated by the ACT Government as part of the 2022 amendment to the *Climate Change and Greenhouse Gas Reduction Act 2020*. This amendment resulted in a new requirement for assessment by an independent entity (Part 3, 15A): "The Minister must, at least once every 5 years, ask an independent entity to assess, and report to the Minister about, government policies, programs and practices to address climate change in the ACT, including actions taken to mitigate and adapt to climate change."

The purpose of this review is to deliver insights and identify priorities for future ACT Government action, with a dual focus on actions designed to mitigate climate change by achieving emission reduction targets, as well as actions designed to support adaptation to the impacts of climate change.

The review's methodology was approved by the Environment, Planning and Sustainable Development Directorate (EPSDD), and considers Key Evaluation Questions from three perspectives:

- **Document cataloguing:** We reviewed a total of 53 ACT climate change documents. These represent a sample of all climate-related documents in the ACT and were supplied by EPSDD in consultation with other directorates and stakeholders.
- **Stakeholder engagement:** We conducted semi-structured interviews with groups of internal ACT Government stakeholders and external community groups in the ACT. Two synthesis workshops were also run with internal ACT Government staff in Canberra during September. The aim of the workshops was to test some of the early review findings and to address some questions that arose during the initial stage.
- **Insights:** We used the C40 Cities Climate Transition Framework (C40 Framework) as a foundational framework for the review. A key area of focus was to consider the implication of recent climate-related developments, particularly the introduction of climate-related financial disclosure obligations.

This review is not a detailed audit or evaluation of individual climate-related policies and programs in the ACT. Rather, the review investigates the appropriateness of overarching frameworks and is only able to draw conclusions about the appropriateness and effectiveness of climate actions in the ACT where relevant evaluation findings are available. This review was designed to be cognisant of and build upon previous evaluations of legislation, programs and policies, and not duplicate these efforts.

Key findings and insights

The ACT has strong foundations to deliver net zero emissions and strengthen climate resilience. The review found that the **strong community support for climate action** across a majority of the ACT is a major asset for the Territory.

Climate change is, itself, subject to constant change. Physical climate risks are already impacting the environment and societies, and transition risks are evolving as the complexity of decarbonising economies is better understood. The research findings recommend the ACT Government ensure **adaptive structures** (such as goals, targets and risk assessments) are in place **to support transformation to net zero emissions and climate resilience**.

It is imperative for the ACT to have **a climate vision that explicitly commits to achievement of net zero emissions and strengthened climate resilience**, consistent with climate science and the Paris Agreement 1.5°C ambition. The ACT's climate vision should clearly communicate all goals and targets in a single statement. We recommend that the ACT **bring forward its net zero emissions target from 2045 to 2040**, recognising that IPCC's most recent assessment finds that global GHG emissions in 2030 implied by

nationally determined contributions (NDCs) make it likely that warming will exceed 1.5°C during the 21st century and make it harder to limit warming below 2°C. **It is recommended that ACT establish more adaptation targets and goals** which were found to be somewhat lacking.

Currently, strategic plans in the ACT are numerous and, at times, fragmented. The review utilises C40's guidance that a Climate Action Plan is a document, or series of documents, in which a city sets out its roadmap for reducing greenhouse gas emissions and strengthening climate resilience across the community.¹ It is recommended that the **ACT develop a consolidated Climate Action Plan** along these lines, which brings together work across Directorates and includes short-, medium and long-term targets.

A Climate Action Plan would essentially be the ACT's Climate Change Strategy. It would consolidate all climate-related actions across the ACT. It need not include all work in detail, but it should be the key that links climate-related documents and key targets and goals across the ACT Government.

As part of planning and management of climate-related risks and opportunities, the review recommends that the ACT should release **annual climate-related financial disclosure statements**. Aligning to new Federal legislation disclosures should include Scope 1, 2 and 3 emissions reporting and scenario analysis of at least two scenarios: a 1.5°C increase in global temperature by 2050 (low warming scenario) and a scenario that 'well exceeds' 2°C by 2050 (high warming scenario)².

The process of producing climate-related financial disclosures will enable the ACT to consider evolving transition risks and opportunities. An example of the benefit of such understanding is energy markets, in which the growth of battery storage supports the capacity to match renewable energy supply against demand. It is recommended that the ACT's renewable electricity targets be reviewed to **support 24/7 matching of renewable electricity with energy demand**.

Our review of ACT Government documents revealed **strong evidence of governance processes**. Feedback from stakeholders was that the Parliamentary and Governing Agreement (PAGA) created by the 10th Legislative Assembly (previous government) was the primary driver of Directorates' climate action. Under current decision-making frameworks, however, the ACT Government does not have an effective means of prioritising economically efficient investment in emissions reduction initiatives. To support economically efficient investment decisions that have a climate-related component, the Climate Action Plan should establish processes to **integrate financial considerations into government climate-related decisions**, through internalising externalities such as the value of emission reductions.

It is recommended that the ACT Climate Action Plan should be a legislative requirement, through an amendment to the Climate Change and Greenhouse Gas Reduction Act 2010. This will help ensure that sustained climate action and resilience planning are embedded in government priorities.

Stakeholders who engaged in the review process were keen to sustain and improve **mechanisms for the ACT Government to keep abreast of climate-related developments and capture gaps and opportunities**

¹ C40 Knowledge (2024) *Climate Action Planning Guide: Why all cities need a Paris Agreement-compatible climate action plan*. https://www.c40knowledgehub.org/s/guide-navigation?language=en_US&guideRecordId=a3t1Q0000007LEWQAY&guideArticleRecordId=a3s1Q000001iahcQAA

² This mirrors the climate scenarios suggested in the AASB's Climate-related financial disclosures S2 (i.e. a low-warming 1.5°C above pre-industrial levels scenario and a high-warming 2.5°C above pre-industrial levels scenario). Similar to IFRS S2, the AASB S2 mandates two climate scenarios (a low-warming and high-warming scenario) but does not prescribe specific temperature outcomes for scenario analysis. The low-warming scenario should align with an increase in global average temperature limited to the increase in the *Climate Change Act 2022* (i.e. 1.5°C above pre-industrial levels). The high-warming scenario should align with the global average temperature well exceeding the increase in the *Climate Change Act 2022*, the AASB S2 suggests an increase of 2.5°C would be considered appropriate.

that it could pursue. The ACT Government is fortunate to have local access to an impressive depth of climate expertise, including at ANU and the University of Canberra. It is recommended that the ACT Government encourage and facilitate the development of a **climate ecosystem: an open network of ACT climate experts that would support learning linked to Monitoring, Evaluation, Reporting and Improvement (MERI) frameworks**, providing a way for climate-related developments to be considered and debated across the ACT collaboratively.

Research shows effective partnerships in climate action typically involve voluntary and collaborative relationships where there is an equitable sharing of risks, responsibilities, resources, benefits and actions.³ External stakeholders consulted during the review did not often see themselves as being 'partners' with the ACT Government around climate change action. It is recommended that the ACT Government establish a **Climate Community Partnership Framework** and financially resource community groups to participate in climate consultations, manage partnerships and implement MERI practices. Resourcing of community groups strengthens their ability to support vulnerable communities, especially during and after extreme weather events.

External factors impacting the ACT are likely to keep changing and evolving over time. The establishment of a Climate Action Plan, climate ecosystem and Climate Community Partnership Framework would provide the ACT with a mechanisms to keep abreast of climate-related developments. Community groups could work with Canberra based universities to convene a climate ecosystem as part of a Climate Community Partnership Framework.

A key consideration for the ACT Government is **whether delivering social and wellbeing strategies for ACT residents comes at the expense of taking climate action**. There are examples, including in housing, where climate action can deliver social benefits *alongside* environmental benefits. It is recommended that the ACT continue to identify and prioritise opportunities where social and wellbeing strategies and climate actions can deliver co-benefits. This will require collaboration and cohesion between the ACT's Wellbeing Framework and the proposed Climate Action Plan.

Currently, **Monitoring, Evaluation, Reporting and Improvement (MERI) practices relating to climate action vary within and between Directorates**. The responsibility of enhancing MERI practices best lies with a centralised government area that spans all Directorates. In the ACT, this would logically be the Chief Minister, Treasury and Economic Development Directorate (CMTEDD). It is recommended that current structures be strengthened and new efforts made to foster learning, and also that a needs analysis be conducted to understand the barriers to more consistent application of best practice MERI. Behaviour change theory can be used to inform the design of effective programs for building evaluation capacity.

³ United Nations Department of Economic and Social Affairs (2015) *Partnership for Sustainable Development Goals: A legacy review towards realizing the 2030 agenda*.
<https://sustainabledevelopment.un.org/content/documents/2257Partnerships%20for%20SDGs%20-%20a%20review%20web.pdf>

Summary of recommendations

Create an ACT Climate Action Plan as a regularly updated, expanded version of the current Climate Change Strategy (Key Evaluation Question 1,2,3)

- 1.1 An ACT Climate Action Plan should be established with an updated vision, targets and goals, clearly articulating that the ACT's vision is to achieve net zero emissions and strengthen climate resilience consistent with climate science and the Paris Agreement 1.5°C ambition.
- 1.2 Informed by climate science, the ACT Climate Action Plan should combine all relevant targets and goals across different legislation, strategy and action plans into a single climate action document.
- 1.3 The ACT Climate Action Plan should place particular emphasis on medium-term targets and adaptation resilience targets, which are identified as gaps in the current Strategy.
- 1.4 The ACT Climate Action Plan should bring forward the ACT's net zero emissions target from 2045 to 2040 at the latest. A more aggressive emissions reduction pathway is consistent with the IPCC assessment that current Nationally Determined Contributions (NDC) commitments risk increasing temperatures beyond 2.0°C.
- 1.5 Review the ACT's renewable electricity practices and targets to recognise evolving opportunities for '24/7' renewable energy power including the development of associated standards.
- 1.6 The ACT Climate Action Plan should incorporate annual climate-related financial disclosure statements that would include scenario analysis, transition planning and an assessment of both physical and transition risks based on common metrics aligned to international best practice.
- 1.7 To support economically efficient investment decisions that have a climate-related component, a Climate Action Plan should establish frameworks to internalise externalities, such as a frameworks that value emission reductions.
- 1.8 The ACT Climate Action Plan should be established as a legislative requirement, through an amendment to the Climate Change and Greenhouse Gas Reduction Act 2010.

Create structures to facilitate coordination, the building of partnerships, the sharing of expertise and involvement from the broader ACT community (Key Evaluation Question 4,5,6,7)

- 2.1 The ACT Government should leverage the depth of climate expertise across the ACT, including at ANU and University of Canberra, establishing an ACT Climate Ecosystem as an open network of climate experts based on MERI frameworks. This would provide a mechanism to allow climate-related developments to be considered and debated across the ACT.
- 2.2 The ACT should establish a Climate Community Partnership Framework as a mechanism to structure collaboration between the ACT Government and community groups. Financial resourcing of community groups should be part of this framework, to support their participation in consultations, management partnerships and implementation of MERI practices.
- 2.3 The responsibility for embedding and strengthening MERI practices should sit with an area of ACT Government that has capacity to influence practice across all Directorates.
- 2.4 The design of effective MERI strategies, integrated into the Climate Action Plan, should draw on behaviour change theory.
- 2.5 The ACT Government should identify and prioritise opportunities for social and wellbeing strategies to align with climate actions to deliver co-benefits. This will require collaboration and cohesion between the ACT's Wellbeing Framework and the Climate Action Plan.

1 Introduction

1.1 Policy context – national and international

The Intergovernmental Panel on Climate Change (IPCC) has found that human activities, principally through emissions of greenhouse gases, have caused global warming, with global surface temperature reaching 1.1°C above 1850-1900 levels in 2011-2020.⁴ The IPCC notes that crossing the 1.5°C threshold risks unleashing more severe climate change impacts, including more frequent and severe natural disasters and extreme weather.

To mitigate against the impacts of climate change, on 12 December 2015, 196 countries at the UN Climate Change Conference (COP21) established a legally binding international treaty known as the Paris Agreement. COP28, held in Dubai in 2023, was the first 'global stocktake' of the implementation of the Paris Agreement. The outcome was an acknowledgement that progress has been too slow across all areas of climate action, with a call on governments globally to accelerate the transition.

According to the IPCC's most recent summary of the state of knowledge of climate (the Sixth Assessment Report (AR6)), limiting warming to around 1.5°C requires global greenhouse gas emissions to peak before 2025 at the latest and decline 43% by 2030. Even if this is achieved, global GHG emissions in 2030 implied by nationally determined contributions (NDCs) announced by October 2021 make it likely that warming will exceed 1.5°C during the 21st century and make it harder to limit warming below 2°C.⁵

At a national level, Australia's climate has warmed by an average of 1.5°C since 1910 and sea surface temperatures have increased by an average of 1.08°C since 1900.⁶ Extreme weather and natural disasters are increasing in frequency and intensity due to climate change. Natural disasters currently cost the Australian economy \$38 billion per year and this cost will rise to at least \$73 billion per year by 2060.⁷

Decarbonisation is one of the key focus areas of global climate action. Australia has legislated a national target of 43% reduction in greenhouse gas emission by 2030 (against a 2005 baseline) and net zero emissions by 2050.⁸ All Australian state and territory governments have also committed to net zero emissions by 2050 or earlier.

Adaptation is another focus area, involving adjustments in ecological, social and economic systems in response to actual or expected climate impacts and their effects. At an international level, the United Arab Emirates Framework for Global Climate Resilience⁹ (agreed in 2023) includes a range of thematic and dimensional targets for climate adaptation and resilience.

⁴ IPCC (2023). *Headline Statements*. <https://www.ipcc.ch/report/ar6/syr/resources/spm-headline-statements/#:~:text=Human%20activities%2C%20principally%20through%20emissions,%E2%80%931900%20in%202011%E2%80%932020>.

⁵ Ibid.

⁶ Bureau of Meteorology (2024). *State of the Climate 2024*. <http://www.bom.gov.au/state-of-the-climate/>

⁷ Deloitte Access Economics (2021). *Special report: Update to the economic costs of natural disasters in Australia*. https://australianbusinessroundtable.com.au/assets/documents/Special%20report:%20Update%20to%20the%20economic%20costs%20of%20natural%20disasters%20in%20Australia/Special%20report%20_Update%20to%20the%20economic%20costs%20of%20natural%20disasters%20in%20Australia.pdf

⁸ Department of Climate Change, Energy, the Environment and Water (2024). *Net Zero*. <https://www.dcceew.gov.au/climate-change/emissions-reduction/net-zero>

⁹ United Nations Foundation (2023). *UAE Framework for Global Climate Resilience*. <https://unfoundation.org/what-we-do/issues/climate-and-energy/uae-framework-for-global-climate-resilience/>

Priorities here include:

- Reducing climate-induced water scarcity and enhancing climate resilience to water-related hazards
- Attaining climate-resilient food and agricultural production and supply and distribution of food
- Attaining resilience against climate change related health impacts, promoting climate-resilient health services, and significantly reducing climate-related morbidity and mortality
- Reducing climate impacts on ecosystems and biodiversity
- Increasing the resilience of infrastructure.

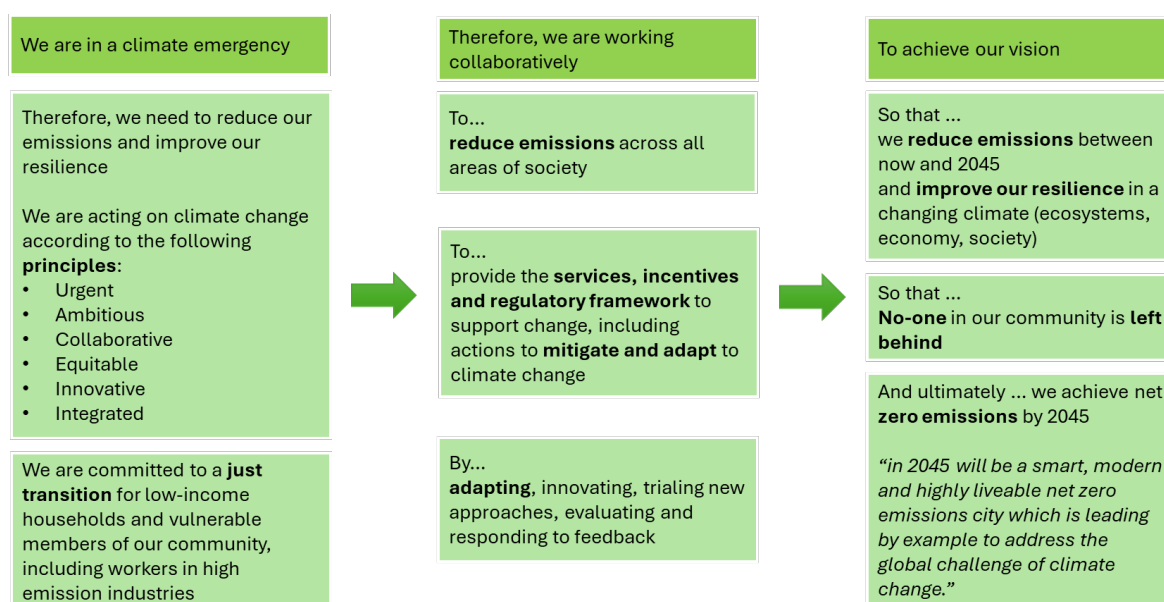
Aligned with international climate treaties, there are a range of initiatives and frameworks in place to help nations and governments develop local strategies, policies and programs for mitigation and adaptation.

1.2 Policy context in the ACT

The ACT has set targets around reducing greenhouse gas emissions and preparing for the impacts of climate change. The ACT is committed to achieving net zero emissions by 2045 (based on 1990 levels), with progressive reductions between now and 2045 (50-60% by 2025, 65-75% by 2030 and 90-95% by 2040).¹⁰ The targets are legislated under the Climate Change and Greenhouse Gas Reduction Act 2010 (reviewed in 2021).

The draft logic model (Figure 1) sets out the ACT Government's Approach to Climate Action.

Figure 1: ACT Government's Climate Change approach



Derived from the ACT Climate Change Strategy 2019-25 Summary¹¹

¹⁰ ACT Government (2021). ACT Climate Change Strategy. <https://www.climatechoices.act.gov.au/policy-programs/act-climate-change-strategy>

¹¹ ACT Government (2019). ACT Climate Change Strategy 2019-23 Summary.

https://www.climatechoices.act.gov.au/__data/assets/pdf_file/0004/1414642/ACT-Climate-Change-Strategy-2019-2025-Summary.pdf

This model was developed by the review team, in consultation with the project manager from the Environment, Planning and Sustainable Development Directorate (EPSDD).

A logic model explains how an intervention (in this case the ACT Government's climate change work) is supposed to bring about its intended outcomes (i.e. what is to be evaluated). The ACT Government recognises the climate emergency and is acting to mitigate and adapt to climate change. The government is working collaboratively to provide services, incentives and the regulatory framework needed to support the transition. The aim is to achieve net zero emissions by 2045, to improve resilience in a changing climate and for no-one to be left behind (including low-income households and vulnerable community members).

2 Review methodology

Rooftop Social and the Institute for Sustainable Futures (ISF) at the University of Technology Sydney were engaged to undertake a review of the ACT Government's action on climate change, with a focus on actions taken 2019-24. This review is mandated by the ACT Government.

The purpose of this review is to deliver insights and identify priorities for future ACT Government action, with a dual focus on actions designed to mitigate climate change by achieving emission reduction targets, as well as actions designed to support adaptation to the impacts of climate change.

The review also provides recommendations about how to strengthen monitoring, evaluation, reporting and improvement (MERI) efforts in the future.

Feedback on the review methodology was sought from the Steering Committee, Technical Working Group that was established with the specific role to oversight this review, and the project team within EPSDD that was tasked with managing the review process. The Key Evaluation Questions for the review (KEQs) were finalised in consultation with the EPSDD project team and are set out in Table 1.

The [Australian Centre for Evaluation](#) guidelines were used to define key terms in the evaluation questions. Due to resource constraints, one question from the original RFQ for this review was agreed to be out of scope and was removed. (The question was: A meta-analysis that synthesises all existing evaluation, monitoring, review and research reports applicable to climate action in the ACT over the previous five years).

Table 1: Key Evaluation Questions and explanation

Key Evaluation Questions	Explanation
1. Vision Does the ACT Government have an appropriate vision and direction setting on climate change that considers the broader climate action agenda?	By appropriate we mean: How well does the vision and direction align with the broader climate change action agenda (e.g. what is happening in cities that are part of C40)?
2. Strategic plans Are the existing strategic plans deemed appropriate and effective to meet the government vision on climate change?	By appropriate we mean: - How well aligned are the strategic plans to the vision? - How well designed are the strategic plans/how likely are the strategic plans to make the intended difference? By effective we mean: - To what extent are the strategic plans delivering the intended outcomes? (Limitation – this review is not an audit)
3. Process and decision making, including how investment decisions are made Are climate change impacts considered and embedded into key government decisions, work and processes? If not, how and where can they be embedded?	The goal is to understand how climate change impacts are considered when government makes decisions and provide ideas about what can be improved. Key words: - Climate change impacts – adaptation and mitigation - Work – e.g. projects, programs, initiatives - Processes – e.g. business case development templates

Key Evaluation Questions	Explanation
4. Recognition of challenges The findings from the latest emissions projections modelling suggests that there may be challenges for the ACT to meet interim and net zero targets under the existing policy settings. What are the strategic gaps and opportunities to help achieve our interim and net zero targets, and climate resilience objectives?	We are not commenting on the emissions projections modelling. We are also not doing a literature review of what happens outside the ACT. We are using insights from the review to identify gaps and opportunities. To a limited extent, we are drawing upon what is happening elsewhere (e.g. in cities that are part of C40).
5. Partnerships To achieve net zero targets, the ACT Government can't do it alone. Partnerships with business, community service organisations and responsibility sharing between individuals, community and government is essential. Does the ACT Government have the right partnership and engagement/ communication settings?	The goal is to understand the processes, policies and frameworks in place around partnerships, engagement and communications. We are using insights from the review to provide ideas about what can be improved. We are not doing an audit of partnerships.
6. External factors a) What are the key external factors that create opportunities, risks or uncertainties for ACT Government actions? For example, how might Commonwealth or other jurisdictions' strategies and progress impact the ACT's ability to deliver emissions reductions? Social and wellbeing strategies b) How does the impact of social and wellbeing strategies and progress impact the ACT's ability to deliver emissions reductions (e.g. housing, cost of living, food insecurity)?	This question is about what helps/hinders the ACT deliver emission reductions. It has two parts – (1) external factors (2) internal factors. a) What are the key external factors – from NSW, Commonwealth, private sector and overseas (to a lesser extent)? b) How is the ACT wellbeing framework implemented? How does the ACT prioritise what it funds? How are tensions / trade-offs between wellbeing and emissions reductions handled? What is working well, what can be improved?
7. MERI Are monitoring, evaluation, reporting and improvement processes in place and appropriate? What are the risks, gaps and opportunities in evaluation and reporting?	MERI processes should enable staff to evaluate their work and use evidence for continuous improvement, accountability and decision making. By appropriate we mean: • How well designed are the MERI processes? • To what extent do they support people to evaluate their work? The goal is to understand what MERI processes are in place and use insights from the review to provide ideas about what can be improved. We are not doing an audit of MERI.

2.1 Document cataloguing

A total of 53 ACT climate change documents were reviewed. The documents represent a sample of all climate-related documents in the ACT and have been supplied by the EPSDD in consultation with other directorates and stakeholders. The documents were published between 2016 and 2024 and range in form, from strategies and frameworks to evaluations and reviews. For the full list of documents please see Appendix C.

An initial scan of key documents was conducted to obtain an overall understanding of the climate change actions undertaken by the ACT Government and the available evidence about their progress. Following this initial scan, there was a clear need to develop and apply consistent assessment criteria for the KEQs.

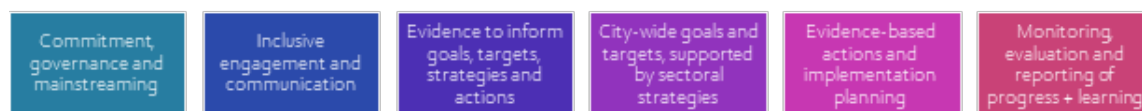
After a review of evidence-based frameworks relevant to the ACT, the C40's Cities Climate Transition Framework (C40 Framework) was chosen as a foundation for the review: both a set of criteria to catalogue the contents of the supplied documentation and as a scaffold for framing discussion questions in the stakeholder interviews (for more detail see Box 1). Appendix A outlines the KEQs, corresponding C40 criteria and the detailed cataloguing criteria.

The use of this Framework is intended to be a proxy of best practice climate actions. It is not intended to be an indicator that the ACT should itself endorse this framework. Appendix B sets out the detailed cataloguing criteria applied to an example document (the ACT Climate Change Strategy 2019-25). In the initial phase of categorisation, criteria were iterated slightly to ensure they were fit for purpose for the ACT. Once finalised, all criteria were applied to the documents consistently.

Box 1: C40 and the Cities Climate Transition Framework

The C40 consists of over 90 member cities that are 'committed to using an inclusive, science-based and collaborative approach to cut their fair share of emissions in half by 2030, help the world limit global heating to 1.5°C, and build healthy, equitable and resilient communities'.¹² C40 was originally established as C20 by then-Mayor of London, Ken Livingstone in 2005.¹³ Today, C40 member cities include Melbourne, Sydney, London, Paris, Singapore, Auckland and New York City.

The Cities Climate Transition Framework consists of 16 criteria (listed in Appendix A), organised into six themes:¹⁴



The origins of the Framework date back to 2018, when C40 developed a Climate Action Planning Framework¹⁵ to support cities with developing and aligning their climate action plans with the ambition and objectives of the Paris Agreement. The recent update and re-brand of the Framework (in 2023) was sparked by with the call at COP27 by the UN Secretary General for Non-State Actors to demonstrate integrity, transparency and accountability on their net zero climate commitments.¹⁶ The update was developed in consultation with representatives from a diverse group of C40 cities and now integrates the UN Secretary General's High Level Expert Group on the Net-Zero Emissions Commitments of Non-State Entities (HLEG) recommendations.

¹² C40 Cities (2024) *About C40*. <https://www.c40.org/about-c40/#:~:text=Mayors%20of%20C40%20cities%20are,healthy%2C%20equitable%20and%20resilient%20communities>.

¹³ C40 Cities (2015) *Celebrating 10 years of results*. <https://www.c40.org/news/celebrating-10-years-of-results/>

¹⁴ C40 Knowledge (2023) *Cities Climate Transition Framework*. https://www.c40knowledgehub.org/s/article/Cities-Climate-Transition-Framework?language=en_US

¹⁵ C40 Knowledge (2020) *Climate Action Planning Framework*. https://www.c40knowledgehub.org/s/article/Climate-Action-Planning-Framework?language=en_US

¹⁶ United Nations Climate Change (2023). *UN Climate Change Unveils Plan to Showcase Leadership and Enhance Accountability*. <https://unfccc.int/news/un-climate-change-unveils-plan-to-showcase-leadership-and-enhance-accountability>

2.2 Stakeholder consultation

We facilitated **semi-structured interviews** with the following groups of internal ACT Government stakeholders and external community stakeholders. Internal stakeholder groups engaged in the review were:

- Transport Canberra City Services (TCCS)
- Office for Climate Action
- Treasury
- Climate Change Policy, including Emissions Reduction Team, EPSDD
- Communications and Engagement, EPSDD
- Government, Schools and Community team, EPSDD
- Business and Economic Development Team, EPSDD
- Community Services Directorate

The following external stakeholder groups were also engaged:

- ACT Climate Change Council
- ACT Council of Social Services (ACTOSS)
- ACT Business Chamber
- ACT Environment Groups (See-change, Canberra Environment Centre and Conservation Council ACT Region)¹⁷

The interviews were organised by EPSDD and were generally one hour in duration, using Microsoft Teams. In most cases, the Microsoft Teams transcription function was used for notetaking purposes. The review team from Rooftop Social and UTS-ISF were present at each interview, together with a representative from EPSDD.

We also facilitated **two half day synthesis workshops** with internal ACT Government staff in person, in Canberra in September. The aim was to test some of the early review findings and to address some questions that arose during the initial stage.

¹⁷ EPSDD representative was present for all the interview with the ACT Environment Groups. However, for all other interviews with external stakeholders, EPSDD left meeting after the introductions.

3 Review Findings

3.1 Does the ACT Government have an appropriate vision and direction setting on climate change that considers the broader climate action agenda?

An appropriate vision is one that commits to achieve net zero emissions and strengthen climate resilience consistent with climate science and the Paris Agreement 1.5°C ambition. The ACT's climate vision should clearly communicate all goals and targets in a single statement. The ACT should bring forward its net zero emissions target from 2045 to 2040 at the latest, establish new adaptation targets and align renewable electricity targets with the need for 24/7 matching of renewable electricity with energy demand.

Reognising that...	Recommendations
- An appropriate <i>vision statement</i> should consist of a statement on both achieving net zero emissions and strengthening climate resilience consistent with the Paris Agreement 1.5°C ambition. - An appropriate <i>direction setting statement</i> in the form of a Climate Action Plan should include short-, medium- and long-term goals or targets informed by evidence based on climate science. There are relatively fewer medium-term goals compared to short- and long-term targets. - The ACT's climate vision is contained in the Climate Change Strategy 2019-2025. Legislated targets are contained in the Climate Change and Greenhouse Gas Reduction Act 2010. Other strategy documents contain targets and goals. - The ACT's climate targets primarily focus on mitigation. There are relatively fewer medium term targets and fewer adaptation targets. - ACT Government staff do not always use the vision from the Climate Change Strategy to guide their work, but use visions from other strategic documents instead. - The identification of the need for firming capacity in energy markets, with resulting calls for '24/7' renewable electricity Power Purchase Agreements which track the percentage of load matched with renewable electricity within the same hour.	Recommendation 1.1 An ACT Climate Action Plan should be established with an updated vision, targets and goals, clearly articulating that the ACT's vision is to achieve net zero emissions and strengthen climate resilience consistent with climate science and the Paris Agreement 1.5°C ambition. Recommendation 1.2 Informed by climate science, the ACT Climate Action Plan should combine all relevant targets and goals across different legislation, strategy and action plans into a single climate action document. Recommendation 1.3 The ACT Climate Action Plan should place particular emphasis on medium-term targets and adaptation resilience targets, which are identified as gaps in the current Strategy. Recommendation 1.4 The ACT Climate Action Plan should bring forward the ACT's net zero emissions target from 2045 to 2040 at the latest. A more aggressive emissions reduction pathway is consistent with the IPCC assessment that current Nationally Determined Contributions (NDC) commitments risk increasing temperatures beyond 2.0°C. Recommendation 1.5 Review the ACT's renewable electricity practices and targets to recognise evolving opportunities for '24/7' renewable energy power including the development of associated standards.

Document cataloguing

To examine whether the ACT has an appropriate vision and direction setting on climate change that considers the broader climate action agenda, three criteria were applied to the document sample:

- Whether the document provided evidence of a vision and commitment to act on climate change (included in four in ten documents).

2. Whether a document contained short, medium, and/or long-term targets and what these were. Seven in ten documents contained a short-, medium- or long-term target, though short- and long-term targets were far more frequently cited than medium-term targets.
3. Whether the document included adaptation and mitigation actions tied to targets. Mitigation actions tied to targets were cited almost four times more than adaptation targets tied to targets. While not a specific criterion, the sample of documents also revealed key direction setting documents for mitigation and adaptation. More detail on the cataloguing can be found below.

Unless otherwise specified, document numbers (e.g. n=5) relate to the whole document sample (i.e. five out of 53 documents reviewed). Likewise, reference to percentages of documents (e.g. 60% of documents) refers to the sample of 53 documents reviewed.

An appropriate vision

Results from cataloguing documents in respect to an 'appropriate vision' reveals:

- There is no vision explicitly linked to limiting warming to 1.5°C. While five documents (out of 53) reference the Paris Agreement, only one document, the *Climate Change Strategy 2019-2025*, references 1.5°C in its opening "Need for Action" section.
- 40% of the document sample (n=21) contained a vision linked to climate change. The majority of these documents (34%, n=18) are "strategic documents", such as strategies, overarching plans, agreements, statements and frameworks, and the *Climate change and Greenhouse Gas Reduction Act 2010*, where a vision is most critical. For these 18 strategic documents, thirteen contain visions linked to climate change and three contain visions but these are not linked to climate change (*Active Travel Plan 2024-30*, *Age Friendly City Plan 2020-2024*, *ACT Disability Strategy 2024-2033*). See more detail on strategic documents in Section 3.2.
- 60% of documents (n=32) had no evidence of a vision linked to climate change action nor did they refer to a vision in an existing document. While it is not necessary for each document to devise a standalone vision, it should refer back to a relevant existing vision. Most of the documents were reviews, evaluations, audits and progress reports (n=25), and instead referred to policy objectives or the Object of the Act. However, this does illustrate that evaluative documents are not reviewing progress towards an overarching vision, including whether the original vision is still relevant.

The most comprehensive vision was outlined in the *ACT Climate Change Strategy 2019-2025*:

"By 2045 the ACT will be a leading net zero emissions territory that demonstrates that a healthier, smarter future is possible.

Canberra in 2045 will be a compact and efficient city of 600,000 people providing a diverse range of housing choices and businesses. Lively precincts will be linked by flexible and efficient transport systems and the city will be home to leading low emissions businesses and research hubs. The city's tree-lined streets, surrounding nature reserves and healthy landscapes will continue to make it a beautiful and enjoyable place to live. The ACT will produce net zero greenhouse gas emissions, helping to address the global challenge of climate change.

The ACT will be powered by 100% renewable electricity and will continue to lead in finding innovative solutions for energy demand management and energy security. This will support a strong and diverse zero emissions economy, establishing the ACT as a zero-emissions investment hub. Homes and commercial buildings will be climate wise; that is, they will be efficient and capable of being comfortable in all seasons and will generate zero emissions having

transitioned off natural gas. The city will be serviced by an integrated transport network that encourages cycling and walking, provides user-friendly zero emissions public transport and supports a zero-emissions vehicle fleet. The impacts of a changing climate on people, infrastructure and services will be well-managed and urban heat impacts will be reduced by an established network of street trees, waterways and parks supported by healthy soils. Productive farmlands, forests and biodiverse nature reserves will be sustainable and resilient to the changing climate.

By 2025 the ACT will have reduced emissions by 50–60% from 1990 levels and implemented several measures that lay the foundations for an efficient transition to net zero emissions by 2045. These initial steps will also contribute to transforming the ACT into a net zero emissions economy.” (ACT Climate Change Strategy 2019-25, p.15)

The vision contained in the *ACT Climate Change Strategy 2019-25* contains commitments to both net zero emissions and climate resilience. This vision has been written from the perspective of an imagined, ideal state. The language in this statement would benefit from clearer statements linking commitments, goals and targets to the Paris Agreement's 1.5°C ambition based on evidence aligned to climate science.

This vision also highlights ACT as a “leading net zero territory”, and 34% of documents (n=18) in total note the ACT as a “leader” or “leading” on climate action. For example, “the ACT has become a national leader on action to address climate change” (*Canberra Region Local Food Strategy 2024-2029*), “the ACT Government has legislated a nation-leading target of achieving net zero greenhouse gas (GHG emissions by 2045 at the latest” (*The Integrated Energy Plan: Our pathway to electrification*)

Appropriate direction setting

At the highest level the key direction-setting documents include the *Climate Change and Greenhouse Gas Reduction Act 2010* for mitigation and adaptation and the *Climate Change Strategy 2019-2025* which incorporates both mitigation and adaptation strategies. More detail on strategic documents can be found in Section 3.2.

The 2019 *Climate Change Adaptation Strategy Completion Report* notes that adaptation work will continue through the *Climate Change Strategy 2019-2025* and the *Living Infrastructure Plan*. Adaptation targets and goals (as discussed below) and adaptation strategies (see Section 3.2) are dwarfed by mitigation targets, goals and strategies in the document review. Importantly, the last substantive risk assessment for the ACT was undertaken in 2017 (the *Territory Wide Risk Assessment 2017*) and is being updated in 2024-25.

There is no universally agreed set of timeframes for short, medium and long-term targets as defined by C40 or UNHLEG. For the purposes of this report, a target is a measurable outcome within a certain timeframe (e.g. 100% renewable electricity by 2020). The following time frames have been used for targets: short term (2020-2029), medium term (2030-2039), long term (2040 onwards).

The documents revealed that the ACT has numerous climate targets and, in some cases, communicates the mechanisms by which these are set, reviewed and how the Government is held accountable for meeting them. Overall, more than 70% of documents reviewed (n=38) contain either a short-term, medium-term or long-term target. As outlined in Table 2, long-term targets are included most frequently (n=32), followed by short-term targets (n=30) and medium-term targets (n=11).

Table 2: Short-, medium- and long-term climate-related targets contained in the document categorisation

Area	Short term targets (n=30)	Medium term targets (n=11)	Long term targets (n=32)
Emissions reduction (Territory, baseline is 1990)	Reduce emissions 40% by 2020 Reduce emissions 50-60% by 2025	Reduce emissions 65-75% by 2030	Reduce emissions 90-95% by 2040 Net zero by 2045 / Phase out fossil gas by 2045 at the latest
Emissions reduction (Government)	Reduce emissions from government operations by over 33% by 2025 (from 2020)		Net zero ACT Government health sector by 2040 Zero emissions from government operations by 2040
Transport (Territory)		ACT to use only ZEV public transport, garbage trucks, taxi and rideshare vehicles by mid 2030s 80-90% ZEV sales by 2030 100% ZEV sales by 2035 No new ICE registrations 2035	Transport Canberra and public transport zero emissions by 2040 Convert existing depots to net zero emissions by 2040
Transport (Government)	Transition of government fleet vehicles, 50% by 2019-20, 100% by 2020-21 Ensure all newly leased ACT passenger fleet vehicles will be ZEVs from 2020-21 (where fit for purpose) Build at least 50 EV recharging stations across Canberra and the region, holding a reverse auction for construction in 2021-22		
Electricity	100% renewable electricity in 2020 and maintain this		

Area	Short term targets (n=30)	Medium term targets (n=11)	Long term targets (n=32)
	Mandatory Renewable Energy Target legislated an additional 9,500 GWh of renewable energy by 2020		
Buildings	Minimum energy efficiency standards regulation for rental properties come into force by 2022-23 Legislated deadline for ceiling insulation in rentals Nov 2026		
Adaptation	54,000 trees by 2024 for tree cover		30% of Canberra's urban environment to be permeable surfaces and canopy cover by 2045

Note: Targets have been taken from the 53 documents in the sample only, and do not represent all of the climate-related targets in the ACT.

Reference to targets includes those set through legislation that are required to be reported on through the Minister's Annual Report (e.g. emissions reduction targets); or targets set in a strategy that are audited by the ACT Audit Office (e.g. zero emissions vehicle targets); or targets that are softer commitments without explicit accountability measures (e.g. "an additional 40–45% of car journeys would need to shift to active travel and public transport by 2045 to achieve net zero emissions").

Targets span emissions reduction and transport (for the Territory as a whole and for the ACT Government), renewable electricity, buildings and adaptation. Compared to mitigation targets, there are far less adaptation and climate resilience targets. This is then reflected in mitigation and adaptation strategies directly linked to targets. For example, 17% (n=9) documents contain adaptation strategies directly linked to targets, while 64% (n=34) contain mitigation strategies directly linked to targets.

Stakeholder perceptions

Some internal stakeholders suggested that the current vision and direction setting in the ACT Climate Change Strategy needs to reflect:

- The need for adaptation to be on equal footing with mitigation, due to the changes in the climate that have happened in recent years
- The challenges coordinating climate actions, with one example being the development of the Integrated Energy Plan.
- The challenge for Directorates whose core responsibilities outside of energy working on energy-related issues.
- The need to go beyond carbon reduction and address broader aspects of climate action (e.g. go beyond net zero emissions)

- The need to include reference to current understanding and priorities like a just transition and health impacts of climate change on humans
- The opportunity to make vision and direction setting shorter, clearer and less complex, to make it easier to communicate and more memorable
- The need to make vision and direction setting useful to guide everyday work – currently it is very high level and staff often use other visions to guide their work (e.g. from their Directorate or the ACT Government Integrated Energy Plan).

Some internal stakeholders identified that embedding climate risk into whole of Government work was a current gap. Others told us that they use risk assessments at a project level (e.g. when designing logic models). Some people also mentioned that developing medium-term targets are useful when tracking progress of programs or policies but can increase the risk of not meeting targets within a parliamentary cycle.

Insights

The ACT would benefit from a Climate Action Plan

The C40 can be considered best practice in terms of strategic plans that are appropriate and effective to meet a city's vision on climate change. The C40 provide guidance on expectations for an appropriate climate strategy. According to C40 a Climate Action Plan (CAP), which is defined as a document, or series of documents, in which a city sets out its roadmap for reducing GHG emissions and strengthening climate resilience across the community.¹⁸ C40 state that a Paris Agreement-compatible CAP will:

- Enable the city to act quickly on the most prominent local sources of GHG emissions by developing a pathway to deliver an emissions-neutral city by 2050 at the latest and set an ambitious interim target and/or carbon budget.
- Demonstrate how the city will adapt and improve its resilience to the climate hazards that may impact the city now and in future climate change scenarios.
- Detail the wider social, environmental and economic benefits expected from implementing the plan, prioritising inclusive and equitable climate actions that benefit all citizens.
- Outline the governance, powers and partners the city needs to engage to accelerate the delivery of its mitigation targets and resilience goals.

An appropriate vision should be aligned with 1.5°C and include both mitigation and adaptation strategies

An example of a best practice climate change vision statement relevant to the ACT is the C40 Cities Climate Transition Framework vision. C40 is a global network of around 100 mayors of the world's leading cities that are united in action to confront the climate crisis. C40 originally established a Cities Climate Transition Framework in 2017, recently updating the framework to integrate the United Nations Secretary General's High Level Expert Group on the Net-Zero Emissions Commitments of Non-State Entities (HLEG) recommendations.¹⁹ C40 states the framework was established to

¹⁸ C40 Knowledge (2024) *Climate Action Planning Guide: Why all cities need a Paris Agreement-compatible climate action plan*. https://www.c40knowledgehub.org/s/guide-navigation?language=en_US&guideRecordId=a3t1Q0000007IEWQAY&guideArticleRecordId=a3s1Q000001iahcQAA

¹⁹ United Nations (2022). *Integrity Matters: Net Zero Commitments by Businesses, Financial Institutions, Cities and Regions*. https://www.un.org/sites/un2.un.org/files/high-level_expert_group_n7b.pdf

"support cities in driving short term action and long-term strategic vision for transition to net zero emissions, inclusivity, and climate resilience".²⁰ In respect to vision, the C40 Cities Climate Transition Framework states:

"Public commitment by city leadership to take urgent and equitable action and use available powers and influence to achieve net zero emissions and strengthen climate resilience consistent with the highest ambition of the Paris Agreement (1.5°C).

Setting a positive vision to deliver climate action in line with the objectives of the Paris Agreement is important to build buy-in and support across government branches, business and civil society, for ambitious climate action in the short and long term and to successfully deliver transformational change".²¹

An appropriate vision should include a statement on both achieving net zero emissions and strengthening climate resilience consistent with the Paris Agreement 1.5°C ambition.

The ACT's current vision, which is encapsulated in the *ACT Climate Change Strategy 2019-2025*, should be updated to make clear that the ACT's vision is to achieve net zero emissions and strengthen climate resilience consistent with the Paris Agreement 1.5°C ambition.

Set short-, medium- and long-term targets and goals for mitigation and adaptation

The C40 Cities Climate Transition Framework can be considered best practice in terms of statements on direction setting. In respect to direction setting, Principle 8 of the C40 Cities Climate Transition Framework states:

"Short-, medium- and longer-term city-wide adaptation goals and targets to build resilience and reduce vulnerability, informed by the evidence base and latest climate science"²²

The framework provides guidance around both adaptation and mitigation targets, stating that:

Adaptation Targets are defined as "short-, medium- and longer-term city-wide adaptation goals and targets to build resilience and reduce vulnerability, informed by the evidence base and latest climate science."²³

A city-wide adaptation vision supported by goals and targets set the adaptation trajectory, building and strengthening the city's overall resilience to the impacts of climate change. Detailed adaptation goals and targets that break down the city's adaptation ambitions by hazard, sector or city system can guide the development of focused adaptation actions to reduce vulnerability to the impacts of climate change in specific areas, assets or populations.

Mitigation Targets are defined as "short-, medium- and longer-term city-wide net zero emission reduction targets, informed by the evidence base and latest climate science."²⁴

²⁰ C40 Knowledge (2020). *Climate Action Planning Framework*. https://www.c40knowledgehub.org/s/article/Climate-Action-Planning-Framework?language=en_US

²¹ Ibid.

²² Ibid.

²³ Ibid.

²⁴ Ibid.

Targets and goals are used interchangeably in C40's *Cities Climate Transition Framework* and there is no clear definition by C40 of the difference between a target and a goal. C40's website however, notes that "measurable and actionable climate targets specify the scale and pace at which cities will take action."²⁵ Goals are more overarching and may not be measurable or linked to a date. This document review has only recorded targets on the basis that there are many statements in ACT strategies that can be interpreted as goals.

Using C40 guidance as best practice, should the ACT prepare an updated Climate Change Strategy beyond 2025, careful consideration should be given to updating existing targets and goals or creating new targets and goals. As demonstrated in the document cataloguing and stakeholder perceptions, there is a need to include more medium-term targets and more targets addressing adaptation and resilience.

The ACT should aim for net zero by 2040

To limit warming to 1.5°C with no or limited overshoot, the IPCC states global net anthropogenic CO₂ emissions need to decline about 43% by 2030 (from 2010 levels) and reach net zero around 2050.²⁶ Nationally Determined Contributions (NDCs) are the mechanism for nations to fulfil Paris Agreement commitments. NDCs should reflect the highest possible ambition for a country which should be progressively updated. Australia's current NDC is to achieve a national target of 43% reduction in greenhouse gas emissions by 2030 (against a 2005 baseline) and net zero emissions by 2050. NDCs are updated every five years, with renewed targets due in 2025.

Through the *Climate Change and Greenhouse Reduction Act 2010* the ACT Government has legislated a target to reduce greenhouse gas emissions in the ACT to achieve zero net emissions by 30 June 2045.

IPCC's most recent assessment finds that global GHG emissions in 2030 implied by nationally determined contributions (NDCs) announced by October 2021 make it likely that warming will exceed 1.5°C during the 21st century and make it harder to limit warming below 2°C. Delayed transition will increase climate change impact. The IPCC find that every increment of global warming will intensify multiple and concurrent hazards (high confidence). A recent study found there is a 50% chance of limiting warming to 1.5°C with the remaining carbon budget being 250 giga tonnes of CO₂ as of January 2023. This is equal to around six years of current CO₂ emissions, and even less for a higher chance of limiting warming to 1.5°C.²⁷

A key consideration for the ACT is if there is a likelihood that 1.5°C may not be achieved should this still be a target. The reality is that if globally 1.5°C is not achieved by 2050 there will still be a need to claw back any overshoot to limit climate impacts. As a wealthy, developed nation with huge renewable energy resources and one of the highest per capita emissions rates in the world, Australia has the capacity to rapidly reduce emissions and reach net zero earlier to allow developing countries more time to decarbonise. Science-based calculations of Australia's share of the global carbon

²⁵ C40 Knowledge (n.d.). *Setting Climate Targets*.

https://www.c40knowledgehub.org/s/topic/0TO1Q000000UAEsWAO/setting-climate-targets?language=en_US

²⁶ IPCC (2022). *The evidence is clear: the time for action is now. We can halve emissions by 2030*.

<https://www.ipcc.ch/2022/04/04/ipcc-ar6-wgiii-pressrelease/>

²⁷ Lamboll, R. D., Nicholls, Z. R., Smith, C. J., Kikstra, J. S., Byers, E., & Rogelj, J. (2023). Assessing the size and uncertainty of remaining carbon budgets. *Nature Climate Change*, 13(12), 1360-1367.

An appropriate direction setting for the ACT should reflect Australia's national NDC ambition, at a minimum. A more ambitious emissions reduction pathway than Australia's existing NDC is considered appropriate for the ACT in accordance with the Paris Agreement. Noting that Victoria's recent net zero target also aims for net zero by 2045 (see Table 3). The ACT Climate Change Council provides advice to the Minister for Water, Energy and Emissions Reductions on reducing greenhouse gas emissions and adaptation (see more detail on the Climate Change Council in Section 3.3). The Council's review of the ACT's greenhouse gas emissions target in 2023 recommended updating the net zero goal to 2040. With indicative interim targets of 53% emissions reduction by 2025 from 1990 levels, 70% by 2030, 85% by 2035.³¹

Jurisdiction	2025	2030	2035	2040	2045	2050
TAS		Net zero				
ACT (proposed ACT Climate Change Council)*	53%	70%	85%	100%		
ACT (current)*	50-60%	65-75%		90-95%	Net zero	
VIC	28-33%	45-50%	75-80%		Net zero	
National (proposed Climate Change Authority)			65-75%			Net zero
National (current)		43%				Net zero
NSW		50%	70%			Net zero
SA		60%++				Net zero
QLD			75%			Net zero
WA						Net zero
NT						Net zero

++ Climate Change and Greenhouse Emissions Reduction Act – Draft Amendment Bill introduced to the South Australian Parliament on 29 August 2024.

https://www.climatechoices.act.gov.au/_data/assets/pdf_file/0005/2434064/act-climate-change-council-submission-acts-emissions-reduction-target-review-20230918.pdf

The ACT should review renewable electricity practices and targets

The ACT has a target to achieve "100% of electricity coming from renewable sources." The ACT has achieved 100% purchasing of renewable electricity through power purchase agreements (PPAs) that match the supply of total energy against demand. However, this does not mean the ACT itself is not reliant on fossil fuels for its electricity needs. There is recognition of an increasing mismatch between system-level renewable energy generation and demand, leading to renewables integration challenges. Recent research identifies the opportunity for '24/7' renewable energy PPAs which track the percentage of load matched with renewable energy within the same hour, that would also incentivise development of clean firming or demand flexibility and thereby contribute to improved system-level integration of renewable generation.³²

The matching of energy demand with renewable energy generated within the same hour and the same electricity grid or balancing area, which has been termed 24/7 carbon free energy (CFE), has been championed by the United Nations '24/7 Carbon-free Energy Compact.' Currently there is no global standard for CFE.

As new renewable technologies such as battery storage mature the structure of renewable energy investment is changing. An example is the rapid deployment of big batteries that provide firming capacity. The ACT's Big Canberra Battery project is an example of new investments. The Big Canberra Battery project will deliver an ecosystem of batteries across the ACT to ensure that stability of the electricity grid with the installation of a large-scale battery energy storage system in Williamsdale and installation of behind-the-meter batteries at nine government sites.

It can be expected that new programs to demonstrate the integrity of matching renewable energy demand with supply will emerge. There is a need to develop new standards that will provide integrity around claims of 24/7 carbon free energy. The ACT is well positioned to support the development of new standards.

It is recommended that the ACT's renewable electricity practices and targets be reviewed, recognising evolving opportunities for '24/7' renewable energy power purchase agreements which track the percentage of load matched with renewable energy within the same hour, including the need to develop associated standards.

³² Race for 2030 (2024). *24/7 TRUZERO (Tracking Renewables Utilisation for Zero Emission Reporting and Operation)*
<https://racefor2030.com.au/project/24-7-renewables-solutions-for-matching-tracking-and-enhancing-corporate-renewables-purchasing/>

3.2 Are the existing strategic plans deemed appropriate and effective to meet the government vision on climate change?

An appropriate climate strategy is a document, or series of documents, in which a government sets out its roadmap for reducing GHG emissions and strengthening climate resilience across the community. Current strategic plans are numerous and fragmented. To address this, we recommend the ACT create a single Climate Action Plan which brings together work across Directorates and includes short-, medium and long-term targets. A Climate Action Plan should include an update climate risk assessment for the whole of the ACT that includes analysis of physical and transition risks and opportunities against at least two climate scenarios, a 1.5°C increase in global temperature by 2050 (low warming scenario) and a scenario that 'well exceeds' 2°C by 2050 (high warming scenario).

Recognising that...	Recommendations
- An appropriate climate strategy is a document, or series of documents, in which a Government sets out its roadmap for reducing GHG emissions and strengthening climate resilience across the community. - There are a multitude of important strategic plans, however stakeholders generally agreed there is a need for a single climate plan that integrates various strategies, provides clear direction, breaks down silos and provides regular updates. - There is clear evidence of planning, with seven in ten documents outlining clear actions to meet climate targets. However, just 26 % (n=14) documents explicitly allocated funds for actions to meet climate targets. - Previous climate risk assessment have focused on physical risks. Reflecting new climate-related financial disclosure frameworks, climate risks assessments should consider physical and transition risks against multiple climate scenarios.	Recommendation 1.2 Informed by climate science, the ACT Climate Action Plan should combine all relevant targets and goals across different legislation, strategy and action plans into a single climate action document. Recommendation 1.3 The ACT Climate Action Plan should place particular emphasis on medium-term targets and adaptation resilience targets, which are identified as gaps in the current Strategy. Recommendation 1.6 The ACT Climate Action Plan should incorporate annual climate-related financial disclosure statements that would include scenario analysis, transition planning and an assessment of both physical and transition risks based on common metrics aligned to international best practice.

Building on the definitions of appropriate vision and appropriate direction setting in Section 3.1, the focus of this question is on how appropriate and effective strategic plans are.

By *appropriate* we mean how well aligned a strategic plan is to the vision. By *effective* we mean to what extent are the strategic plans delivering the intended outcomes.

A key limitation is that the Review is not an audit of programs. The focus is therefore on whether there is visibility of outcomes, through for instance the articulation of a pathway and reporting.

Document cataloguing

The ACT has several different strategic plans. The cataloguing exercise sought to identify those strategies that are relevant to guiding climate action.

To examine whether the existing strategic plans are appropriate and effective to meet the government vision on climate change, four criteria were applied to the document sample.

1. The document has evidence of actions to end the use of fossil fuels (included in almost six in ten documents).

2. Which documents contained mitigation and adaptation strategies. Mitigation strategies were included in 85% of documents, while adaptation strategies were included in 55%.
3. The document focuses on a particular sector or sectors (ranging from stationary energy, transport, waste, industrial, land and adaptation). Stationary energy was the most dominant sector in the document sample
4. The document provides evidence of planning and/or resource allocation to meet targets. Seven in ten documents contained evidence of planning tied to targets, while less than three in ten documents committed funding tied to targets. The document "type" was also noted, with eighteen documents identified as "strategic".

More detail on the cataloguing can be found below.

Strategic documents

There are eighteen documents that can be considered strategic plans, as detailed in Table 4. Other documents in the sample included: analysis (n=1), assessments (n=2), audits (n=2), evaluations (n=7), frameworks (n=2), reviews (n=14), reports (n=9).

Table 4: Strategic documents included in cataloguing exercise

No.	Document title
1	Climate Change and Greenhouse Gas Reduction Act 2010
2	ACT Wellbeing Framework
3	Parliamentary and Governing Agreement
4	ACT Climate Change Strategy 2019-25
5	ACT's Zero Emissions Vehicles Strategy 2022-30
6	Zero-emission transition Plan for Transport Canberra
7	Building Canberra's Circular Economy: ACT Circular Economy Strategy and Action Plan 2023-2030
8	Active Travel Plan 2024-30
9	Canberra: A statement of ambition
10	CBR Switched On – ACT's Economic Development Priorities 2022-25
11	Whole of Government Adaptation Framework
12	Canberra's Living Infrastructure Plan: Cooling the City
15	ACT Housing Strategy October 2018
16	Age Friendly City Plan 2020-2024
17	ACT Disability Strategy 2024-2033
18	Canberra Region Local Food Strategy 2024-2029
19	Integrated Energy Plan
51	Sustainability Strategy 2021-2025 (Suburban Land Agency)

Decarbonisation – Most documents (58%, n=31) reviewed provide evidence of action(s) to end the use of fossil fuels. The assessment classification was based on documents that explicitly mentioned "phase out" or "transition away from" fossil fuels. The thirty-one documents noted no new gas connections, phase out of fossil gas and expanding zero emissions vehicles. A further five documents noted the 100% renewable electricity target, although no explicit reference to a phase out or 'transition away from' was included.

Adaptation and mitigation strategies – 85% of documents (n=45) included mitigation strategies, while only 55% (n=29) have adaptation strategies.

Sector coverage – The dominance of mitigation strategies is similarly reflected in the sectoral coverage: with stationary energy included most (n=47) and transport (n=23), noting that while there are adaptation elements to both sectors, most documents referred to mitigation actions. Land (n=23), adaptation (n=19), waste (n=16) and industrial (6) were other sectors addressed. In terms of subsectors buildings and energy efficiency was the most common for stationary energy, while road transport was the most common mode for transport overall, and nature the most common within the land sector.

Planning - The categorisation process also examined whether documents contained evidence of planning and/or resource allocation to meet climate-related targets. 70% of documents (n=37) contained evidence of planning to meet climate targets. This included overarching strategic documents with clear priorities or goals tied to actions, reviews of ongoing policies to determine improvements, or reviews of completed policies with recommendations – all documents included a climate target. For the remaining sixteen documents, some had evidence of planning but were not tied to targets or were tied to targets that were not climate-related.

In comparison, just fourteen documents explicitly allocate funds to actions which meet climate-related targets. To fulfil this criterion, documents needed to specify a dollar amount for a policy or action, rather than abstract commitments. For example, \$5.2 million committed to a pilot electric vehicle program in the *Integrated Energy Plan*. Some of the documents without clear resource allocation were funded through electricity consumers (n=3), had modelled costs for a policy (n=2), or had funds committed but were not tied to climate-related targets (n=3).

Stakeholder perceptions

ACT Government stakeholders generally agreed there is a need for a single climate action plan that brings all the strategies together, but also expressed some concerns. The plan needs to be deliberate, and there must be a genuine willingness to implement it effectively. It needs to be well-coordinated, regularly updated, and focused on actionable outcomes. Good governance processes need to be in place and the plan needs to be adaptable. It should not be overly complex or resource intensive.

Internal stakeholders expressed a desire to move away from excessive planning and instead work together more effectively with a strategic and collective focus.

Feedback from stakeholders indicated that a Climate Action plan could:

- integrate and coordinate various strategies, ensuring they align and support each other
- provide a clear direction and framework, helping to articulate what the transition aims to achieve
- break down silos and encourage collaboration and understanding across different areas
- be regularly updated to stay current and relevant
- communicate how strategies come together.

However, some stakeholders cautioned that it might be:

- large, complex and resource-intensive to develop and maintain
- unfeasible given different strategies have varying timelines, making it challenging to maintain a single, overarching plan
- just another document that takes effort which should be directed, instead, on action

- better to have plans at Directorate level for 'business as usual' guidance.

Insights

Recent developments around climate disclosure and climate scenario analysis can be adopted

In 2017, The Central Banks and Supervisors Network for Greening the Financial System (NGFS)³³, a group of Central Banks and Supervisors was formed. Their goals were to help strengthen the global response required to meet the goals of the Paris Agreement; to enhance the role of a financial system to manage climate risks and to mobilise capital for green and low-carbon investments in the broader context of environmentally sustainable development.

NGFS designed a set of hypothetical climate scenarios which aim to provide a common and up-to-date reference point for understanding how climate change (physical risk) and climate policy and technology trends (transition risk) could evolve in different futures:

- "Orderly" scenarios assume climate policies are introduced early and become gradually more stringent. Both physical and transition risks are relatively subdued.
- "Disorderly" scenarios explore higher transition risk due to policies being delayed or divergent across countries and sectors. Carbon prices are typically higher for a given temperature outcome.
- "Hot house world" scenarios assume that some climate policies are implemented in some jurisdictions, but global efforts are insufficient to halt significant global warming. Critical temperature thresholds are exceeded, leading to severe physical risks and irreversible impacts like sea-level rise.
- "Too little, too late" scenarios reflect delays and international divergences in climate policy ambition that imply elevated transition risks in some countries and high physical risks in all countries due to the overall ineffectiveness of the transition.

NGFS scenarios align to new global standards established by the IFRS Foundation, a not-for-profit, public interest organisation that issues globally accepted accounting and sustainability disclosure standards. IFRS Foundation established the International Sustainability Standards Board (ISSB) in November 2021 at COP26 with the support of the G20,³⁴ issuing two new global sustainability standards, IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and IFRS S2 Climate-related Disclosures in June 2023.³⁵

The concept of climate scenarios that encompass both an assessment of both physical and transition risks has now been embedded into Australia's regulatory frameworks. The Treasury Laws Amendment (Financial Market Infrastructure and Other Measures) Act 2024 requires Australian businesses to disclose information about their exposure to material climate-related financial risks and opportunities, including their climate-related plans, greenhouse gas emissions and governance processes, in accordance with the relevant sustainability standards made by the Australian Accounting Standards Board.

The Act, which has a tiered start date with the largest entities reporting from 1 January 2025, requires businesses to conduct and disclose climate scenarios analysis that includes at least two climate

³³ <https://www.ngfs.net/en>

³⁴ International Financial Reporting Standards Foundation (2024) *About the International Sustainability Standards Board*. <https://www.ifrs.org/groups/international-sustainability-standards-board/>

³⁵ International Financial Reporting Standards (2024). *ISSB issues inaugural global sustainability disclosure standards*. <https://www.ifrs.org/news-and-events/news/2023/06/issb-issues-ifrs-s1-ifrs-s2/>

scenarios; a 1.5°C increase in global temperature by 2050 (1.5 degree scenario) and a scenario that 'well exceeds' 2°C by 2050 (high warming scenario). The key purpose of conducting climate scenario analysis is to enable an assessment of the resilience of their business models and strategies to a range of plausible climate-related pathways and to determine the impact of climate-related risk drivers on their overall risk profile.³⁶

Transition plans provide explanations of both how an organisation will meet its net-zero commitments and the key dependencies that underpin the implementation of its decarbonisation strategy".³⁷ In conjunction with the passage of the Treasury Laws Amendment (Financial Market Infrastructure and Other Measures) Act 2024, in September 2024 the Australian Accounting Standards Board (AASB) released Australian Sustainability Reporting Standard – Climate-related Disclosures (AASB S2). AASB S2 requires that an entity shall disclose any climate-related transition plan the entity has, including information about key assumptions used in developing its transition plan, and dependencies on which the entity's transition plan relies.³⁸

The ACT Government's last Territory-wide climate risk assessment was conducted in 2017 (*Territory Wide Risk Assessment 2017: A strategic level analysis of the natural hazards and other emergency risks facing the ACT*).

We recommend the ACT conduct an updated climate risk assessment that includes both an assessment of physical and transition risks based on at least two climate scenarios, a 1.5°C increase in global temperature by 2050 (low warming) and a scenario that 'well exceeds' 2°C by 2050 (high warming scenario).

A consolidated Climate Action Plan can provide a single source of truth for the ACT's climate actions.

Section 3.1 identified the challenge that ACT's climate strategies are contained in several different documents. While it is legitimate to have a series of strategic plans that cover different climate actions, we suggest the ACT would benefit from having a single Climate Action Plan that integrated all the individual strategies.

The C40 recommends that CAP reporting should be integrated into the city's wider reporting systems.³⁹ In the case of the ACT this may be the annual reporting of Directorates. There are a number of ways in which a CAP can be kept up to date including the establishment of climate portals that enable regular updating of information. An example is Buenos Aires' CAP, BA Cambio Climático,⁴⁰ which is an open portal that hosts visual representations of progress against goals and

³⁶ Basel Committee on Banking Supervision (2024) *The role of climate scenario analysis in strengthening management and supervision of climate-related financial risks*. <https://www.bis.org/bcbcs/publ/d572.pdf>

³⁷ United Nations Environment Programme (2023) *A Tool for Developing Credible Transition Plans*. https://www.unepfi.org/wordpress/wp-content/uploads/2023/12/NZAOA_A-Tool-for-Developing-Credible-Transition-Plans.pdf

³⁸ Australian Sustainability Reporting Standard (2024). *Climate-related Disclosures*. https://standards.aasb.gov.au/sites/default/files/2024-10/AASBS2_09-24.pdf

³⁹ C40 Knowledge (2024) *Climate Action Planning Guide: How to set up monitoring, evaluation and reporting for your city's climate action plan*. https://www.c40knowledgehub.org/s/guide-navigation?language=en_US&guideRecordId=a3t1Q0000007IEWQAY&guideArticleRecordId=a3s1Q0000001aiaQAA

⁴⁰ Buenos Aires (n.d.) *BA Cambio Climático* <https://buenosaires.gob.ar/agenciaambiental/cambioclimatico/ba-cambio-climatico>

targets. One suggestion made by C4o is that templates can be used to streamline reporting across CAP actions over time.⁴¹

As part of revising the current Climate Change Strategy 2019-2025, to create an expanded Climate Action Plan, the ACT has an opportunity to integrate all existing strategies that reference climate actions into a single document. The ACT should create a single Climate Action Plan which brings together the work across numerous Directorates. Such a statement should include short-, medium- and long-term goals or targets for both mitigation and adaptation actions informed by evidence based on climate science. A key focus of a Climate Action Plan should be outlining of governance responsibilities.

Benefits of a Climate Action Plan include:

- Ensuring everyone is working with consistent information, making it easier to understand and communicate progress
- Allowing (if it was detailed and delineated by sector or business) staff to find relevant actions and plans specific to their work
- Ensuring gaps due to siloes are avoided, especially where there are hazards that cross directorates, relevant agencies and organisations
- Enabling (if it had transparent mechanisms and performance targets) the ability to track progress effectively. The existing Ministers Report could be leveraged here to avoid duplication
- Connecting climate risk assessments to actions in a structured way

The concept of developing a Climate Action Plan is about the transition, and climate resilience, of a particular region. Whilst an ACT Climate Action Plan would include a focus on the delivery of ACT Government services, and include elements that are of direct relevance to ACT Directorates such as reporting of Scope 1, 2, 3 emissions, by including a focus on examination of climate scenarios against physical and transition risk the plan would drive actions to reduce emissions and build climate resilience for the whole of the ACT.

⁴¹ C4o Knowledge (2024) *Climate Action Planning Guide: How to set up monitoring, evaluation and reporting for your city's climate action plan*. https://www.c4oknowledgehub.org/s/guide-navigation?language=en_US&guideRecordId=a3t1Q0000007IEWQAY&guideArticleRecordId=a3s1Q000001iaiaQAA

3.3 Are climate change impacts considered and embedded into key government decisions, work and processes? If not, how and where can they be embedded?

Cataloguing of documents revealed strong evidence of governance processes. Feedback from stakeholders was that the PAGA was the primary driver of actions of Directorates. Under current decision-making frameworks, the Government lacks a means of prioritising economically efficient investment in emissions reduction initiatives. An ACT Climate Action Plan should be a legislative requirement through an amendment to the Climate Change and Greenhouse Gas Reduction Act 2010. To support climate-related decision making that is economically efficient, a Climate Action Plan should establish processes to integrate financial considerations into government climate-related decisions.

Recognising that...	Recommendations
- There are a handful of key climate governance documents that are continually referred to in other documents (e.g. the Climate Change Strategy 2019-2025). Most documents have been signed-off by government directors, indicating strong governance processes around the approval of documents. More than 60% of documents contained evidence as the basis for action. - The Climate Change Council is a legislated independent body to advise the Minister for Climate Change, Environment, Energy and Water on reducing greenhouse gas emissions and adapting to climate change. A consistent theme in discussions with stakeholders was that the PAGA drove the actions of Directorates. - The C40's Cities Climate Transition Framework can be considered best practice in terms of guidance on climate governance. The C40 recognise that political leadership is important to establish a city vision, mobilise action, develop partnerships with stakeholders, unlock resources, raise public awareness and ensure a Climate Action Plan is delivered. To secure full, long-term implementation, political leadership needs to be sustained beyond short-term electoral cycles. - Under current decision-making frameworks, the Government lacks means of prioritising economically efficient investment in emissions reduction initiatives.	Recommendation 1.7 To support economically efficient investment decisions that have a climate-related component, a Climate Action Plan should establish frameworks to internalise externalities, such as a frameworks that value emission reductions. Recommendation 1.8 The ACT Climate Action Plan should be established as a legislative requirement, through an amendment to the Climate Change and Greenhouse Gas Reduction Act 2010.

This question considers whether climate change impacts are embedded into key government decisions, work and processes. To understand whether climate change is considered when government makes decisions, we are looking for evidence of formal and informal rules, structures, processes and systems that define and influence action on climate change.

Document cataloguing

To examine if climate change impacts are considered and embedded into key government decisions, work and processes, two criteria and additional content analysis were applied to the document sample.

1. The document provides evidence of a governance process (i.e. was it reviewed and approved by an ACT Government department?). 74% of documents were signed off by an ACT Government department.
2. The document provides evidence that forms the basis of action (included in 83% of documents).

Two further pieces of content analysis were conducted

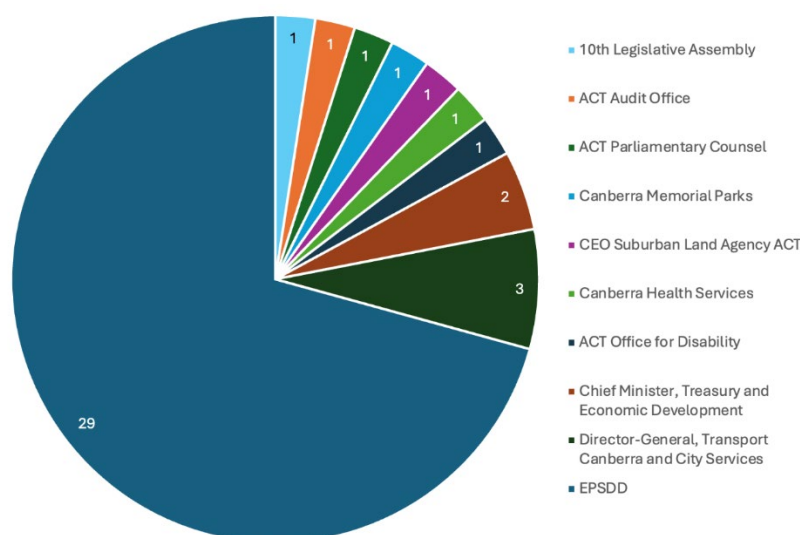
1. How often different climate governance bodies were cited in the document sample
2. How often key climate governance documents were cross cited in the document sample.

More detail on the cataloguing can be found below.

Governance

Most documents reviewed were signed off by a Government Directorate (74%, n=39). The documents reviewed were signed by various Government Directorates or bodies as outlined in Figure 2.

Figure 2: Departmental sign off for documents used in the cataloguing exercise



Of the 55% of documents (n=29) signed off by the EPSDD, most were conducted by an independent consultancy (n=20). For documents without a departmental signoff (n=12), some had a foreword by a Chief Minister or Minister (n=4). The clear evidence that documents have been reviewed by Director Generals with forewords by either the Chief Minister or a Minister is an indication that the ACT has strong governance processes around the approval of documents. Accountability measures that formed the basis for action included reports and reviews required by the *PAGA of the 10th Assembly*, the *Climate Change and Greenhouse Gas Reduction Act 2010*, *Energy Efficiency (Cost of Living) Improvement Act 2012*, *Feed-in (Large-Scale Renewable Energy Generation) Act 2011* and *Feed-in (Renewable Energy Premium) Act 2008*.

Governance bodies

The Climate Change Council was established through the *ACT Climate Change and Greenhouse Gas Reduction Act 2010*. Their main function is to advise the Minister on matters relating to reducing greenhouse gas emissions and addressing, and adapting to, climate change. For each financial year, the Council must prepare a report documenting the Council's activities during the financial year, including any advice given to the Minister. The Minister must consider any relevant advice and is

required to present the Council's annual report to the Legislative Assembly and respond to any advice given by the Council. The Climate Change Council is referred to in seven documents.

The Office for Climate Action is not a legislated body like the ACT Climate Change Council, however it was highlighted in stakeholder consultations as playing a key role in governance. The Office for Climate Action was referred to in three documents, the *2022-23 Minister's Annual Report*, the *EEIS Review 2024* and a report on *Establishing Reporting from Regulatory Data sets for Gas Transition and Electrification program*. As of November 2024, following the election of a new government, the Office for Climate Action is no longer active. This highlights the need to embed climate in more enduring governance and decision-making structures (e.g. legislation).

Evidence as the basis for action

An indicator of how climate is embedded in key Government decisions, work and processes is whether key documents include (climate-related) evidence that forms the basis of action. For the purposes of this report "evidence" includes scientific evidence, assessment of existing conditions including baseline emissions, regular greenhouse gas inventories, a long-term emissions trajectory, accountability measures and climate risks. More than 60% (n=33) of documents contained evidence as the basis for action. This included: greenhouse gas inventories, carbon budgets, emissions projections, emissions abatement for policies, modelling of emissions and cost savings, climate impacts and projected impacts, natural disasters, temperature extremes etc.

83% of documents (n=44) provide evidence of economic data. To fulfil this criterion, documents needed to consider the business-case for climate action and/or consider the costs of adaptation or business-as-usual. This included: cost benefit analysis, cost savings for government from an initiative, business cases, cost and feasibility studies, cost of congestion (highlighting the benefit of active travel) and the value of the ACT's public urban forest etc.

The *Climate Change Strategy 2019-2025* is a standout in sharing climate-related evidence, setting out a clear case for action, articulating carbon budgets and climate impacts the ACT is now facing and will face in the future. The Territory's increased focus on climate over time is clearly demonstrated through the two statements of ambition: *Canberra: A Statement of Ambition (2016)* and *CBR Switched On – ACT's Economic Development Priorities 2022-25 (2022)*. Climate change sits on the periphery of the 2016 statement, not mentioned until page 22, sitting under "Direction of travel 2, opening and diversifying the local economy", one of four directions of travel. In comparison, the 2022 statement centres climate as one of its three missions, "Mission 2 Towards a net zero city and beyond" and comprehensively outlines the importance of climate action and elaborates on mitigation and adaptation actions.

There are a handful of key climate governing documents

From the consultations and document review conducted, a few key documents were highlighted as being particularly influential in driving action and strategy. This includes: the *Climate Change Strategy 2019-2025*, *The Wellbeing Framework*, the *PAGA*, the *Minister's Annual Report*, *The Living Infrastructure plan*, and various pieces of legislation:

- The *Climate Change Strategy 2019-2025* was mentioned in 29 documents (including the strategy itself).
- The *Minister's Annual Report* was mentioned in five documents. It is required under the *Climate Change and Greenhouse Gas Reduction Act 2010*, which requires progress towards the Zero

Emissions Government targets to be publicly reported each year. This document also reports on progress against the actions laid out in the *Climate Change Strategy 2019-2025*.

- The *Wellbeing Framework* was mentioned in thirteen documents. The influence of this document appears quite minimal in the documents reviewed, with just a few incorporating the Framework substantively or measuring against its indicators.
- *The Living Infrastructure Plan* was mentioned in thirteen documents. Although the document is limited in scope, and the ACT notes it does not serve as a whole adaptation strategy.
- The PAGA was mentioned in eight documents. Participants in the consultations noted the key role of the PAGA. While the PAGA is influential, it is the least referenced compared to other overarching documents.
- A few pieces of legislation were mentioned numerous times in the document review, with evaluations, reviews and reports undertaken as required by their respective Acts. This included: the *Climate Change and Greenhouse Gas Reduction Act 2010* (n=12), *Energy Efficiency (Cost of Living) Improvement Act 2012* (n=9), *Feed-in (Large-Scale Renewable Energy Generation) Act 2011* (n=6) and *Feed-in (Renewable Energy Premium) Act 2008* (n=2).

It should be noted that, under the newly elected government in November 2024, the PAGA and the Office for Climate Action no longer exist.

Stakeholder perceptions

Climate-related decision making across government

A consistent theme in discussions with stakeholders was the importance of the PAGA in driving the actions of Directorates. The PAGA was seen as a guiding light, but not legislation. Rather “a factual mechanism that drives action”.

There are many strategies across different Directorates, which makes it challenging to understand climate-related decision making across Government. One way of overcoming this issue could be to develop a Climate Action Plan as a single source of truth. There was general support for this idea amongst internal stakeholders, particularly if it was live and delineated by sector. However, some people noted that creating and maintaining such a source could be complex and resource-intensive, requiring careful design and coordination.

From the viewpoint of internal stakeholders, there are efforts to integrate climate considerations into decision making, however implementation is inconsistent and varies across different parts of government. For example:

- The ACT Wellbeing Framework includes a domain related to climate change and environment. Cabinet packages are required to use this Framework. However, it does not apply to all projects and is not always used as intended.
- Sometimes decisions can be political, and there are trade-offs between different priorities (e.g. spending on hospitals versus climate), rather than using a whole of ACT approach.

Integrating financial considerations into decisions

A key challenge stakeholders identified was integrating financial considerations into government climate-related decisions. With the potential for a limitless number of climate-related projects that the ACT could invest in, stakeholders identified the need to be able to define the most cost-effective way to deliver net zero targets.

Efforts were being made to develop tools and resources to give an accurate assessment of carbon abatement, which could be included in assessment processes to enable a comparison of projects. An example cited was the development of a Emissions Abatement Assessment Framework.

Insights

To understand whether climate change is considered when Government makes decisions, we are looking for examples of formal and informal rules, structures, processes and systems that define and influence action on climate change. Considering whether climate change impacts are considered and embedded into key government decisions, work and processes requires identifying best practice.

The C40's *Cities Climate Transition Framework* can be considered best practice in terms of guidance on climate governance.

C40 defines climate governance as the “formal and informal rules, structures, processes and systems that define and influence action on climate change”. According to C40, a “good climate governance system is integral to the effective implementation of a city’s climate action plan (CAP) and to ensuring that the plan is embedded in all city activities and decision-making processes. It is critical that the climate action planning process consider and assess existing governance structures and strengthen those structures to create a supportive environment for implementation”.⁴²

While there is no ‘right’ way to define roles, responsibilities and relationships, according to the C40, experience of cities suggests the need for a clear allocation of roles and responsibilities, defined structures and mechanisms for effective cross-agency coordination and investment in human resources for CAP development and implementation. C40 recognises that sustained political leadership is essential to CAP development and implementation. According to C40 during CAP development, “political leadership is important to establish a city vision, mobilise action, develop partnerships with stakeholders, unlock resources, raise public awareness and ensure the CAP is delivered. To secure full, long-term implementation, political leadership needs to be sustained beyond short-term electoral cycles. To help build and sustain political leadership, cities can focus on the wider benefits of the CAP for political priorities, build cross-party political leadership and develop coalitions of influential non-state actors”.⁴³

From stakeholder consultations the PAGA was seen as the key document that drove actions. The PAGA aligns with the C40's identification of the importance of political leadership. While the PAGA supported climate-related decisions during its operation, as the C40 identifies, this needs to be sustained beyond short-term electoral cycles. In this regard **legislative requirements, rather than political agreements, are a mechanism that better sustains actions beyond short-term electoral cycles.** The legislative requirement for a strategy is already present in parts of the ACT Government, under the Planning Act 2023 and the Nature Conservation Act 2014. **The proposed ACT Climate Action Plan should be a legislative requirement through an amendment to the Climate Change and Greenhouse Gas Reduction Act 2010.**

⁴² C40 Knowledge (2024) *Climate Action Planning Guide: How to strengthen climate governance for an effective climate action plan*. https://www.c40knowledgehub.org/s/guide-navigation?language=en_US&guideRecordId=a3t1Q0000007IEWQAY&guideArticleRecordId=a3s1Q000001iahrQAA

⁴³ Ibid.

A key challenge is to integrate financial consideration into climate-related decisions. Under current decision-making frameworks, the Government lacks a means of prioritising economically efficient investment in emissions reduction initiatives.

The ACT Climate Change Strategy action 5.11 committed to “invest an interim price of \$20 per tonne of emissions from government operations into measures to meet the Zero Emissions Government target from 2020-21 and arrange for an independent body to develop a social cost of carbon (SCC) for application from 2025.” The objective of the \$20/tonne SCC price (collected and distributed by a SCC Fund) was to incentivise the ACT Government to consider the impacts of emissions attributed to its investment decisions. The SCC Fund primarily supported ACT Government agencies to replace gas heating with electric systems. In May 2024 Cabinet agreed to the cessation of the SCC Fund.

Development of the Emissions Abatement Assessment Framework was commissioned in April 2023 to support a clear, consistent, and whole of government approach to assessing climate related expenditure. One aspect of the Framework is a tool which produces key financial, economic and program metrics required to incorporate emissions impacts in cost-benefit analyses.

It is understood that the ACT Government has also commissioned development of work on valuing emission reductions. Mechanisms to value emission reductions can be delivered by using the ACT's emissions reduction targets and the marginal abatement cost of abatement technologies with the highest impact on ACT's emissions profile. Valuing emission reductions allow the emission impacts associated with policies and projects to be monetised and used to inform decision making. This can include incorporating values as inputs into an Emissions Abatement Assessment Framework.

To support climate-related decision making that is economically efficient, a Climate Action Plan should establish processes to integrate financial considerations into government climate-related decisions. This would include establishing common metrics aligned to international best practice. **Any framework to internalise externalities**, such as a framework that value emission reductions, should also be incorporated into the Climate Action Plan.

3.4 The findings from the latest emissions projections modelling suggests that there may be challenges for the ACT to meet interim and net zero targets under the existing policy settings. What are the strategic gaps and opportunities to help achieve our interim and net zero targets, and climate resilience objectives?

Stakeholders engaged in the review process acknowledged that there are gaps and opportunities for the ACT Government in terms of achieving climate change objectives. The scope of this review does not allow the identification of individual gaps and opportunities. The review focuses on identifying the systems and processes that will support the ACT to identify future gaps and opportunities. Whilst the ACT has strong governance processes around climate including the ACT Climate Change Council, there is a need for mechanisms that support identification of risks and opportunities in a rapidly changing environment. By leveraging the depth of climate expertise across the ACT, the ACT Government can encourage and facilitate the development of a climate ecosystem based on MERI (Monitoring, Evaluation, Reporting and Improvement) frameworks that provides a mechanism to allow climate-related developments to be considered and debated across the ACT.

Recognising that....	Recommendations
- Stakeholders engaged in the review process acknowledged that there are gaps and opportunities for the ACT Government in terms of achieving climate change objectives. - The C40 Cities Climate Transition Framework acknowledges the importance of a system for Monitoring, Evaluation, Reporting and Improvement (MERI) to report progress against a climate action plan, recognising the diverse range of actors and influences that affect the delivery of urban climate action. - An appropriate response to an evolving environment is one that enables the ACT Government to keep abreast of climate-related developments and capture gaps and opportunities that the ACT could pursue. - MERI frameworks are an appropriate mechanism to identify gaps and opportunities that enables transparent communication of progress and challenges to delivering on net zero emissions and climate resilience objectives.	Recommendation 2.1 The ACT Government should leverage the depth of climate expertise across the ACT, including at ANU and University of Canberra, establishing an ACT Climate Ecosystem as an open network of climate experts based on MERI frameworks. This would provide a mechanism to allow climate-related developments to be considered and debated across the ACT.

Document cataloguing

To examine strategic gaps and opportunities to help achieve the ACT's interim and net zero targets and climate resilience objectives, one criterion and additional content analysis were applied to the document sample.

1. The document references external factors (included in just under 70% of documents).
2. The frequency of strategic "gaps" and "opportunities" in the document sample. Opportunities were cited almost two and a half times more, compared to gaps. More detail on the cataloguing can be found below.

A handful of documents were focused on examining strategic gaps and or opportunities including: the *Map and Gap Analysis of Support Provided to vulnerable Households to Reduce Carbon Emissions and Energy Hardship* and the three program reviews of the Actsmart program for businesses; households;

and government, schools and communities. The *Map and Gap Analysis* was a highly targeted exercise for a specific program: the Home Energy Efficiency Program for Low Income Households' (HEE Program) which was funded through revenue from the Energy Efficiency Improvement Scheme. The analysis was conducted by EPSDD staff in the context of the HEE Program's current contract expiring with no extension option. The analysis identified the most effective ways the HEE program could help improve energy efficiency and reduce energy hardship for vulnerable households from 2022/23. The Actsmart program reviews took a broader approach, involving stakeholder mapping of programs and policy relationships; and research on behaviour change strategies, strategic intelligence, sustainability, circular economy, energy and events. This research was used as the basis of detailed identification of gaps and recommendations to address this.

Further, one-third of documents (n=19) refer to strategic 'gap' or 'gaps' of one kind or another. This includes data gaps, skills and training gaps, knowledge gaps (including gaps in technical understanding), gaps in eligibility for programs and service gaps, gaps in the *Climate Change and Greenhouse Gas Reduction Act*, specific social inequalities (e.g. closing the gap for First Nations communities and the gender pay gap) and broader gap analysis such as the Actsmart documents outlined above. Note that this analysis only examined documents which referred to 'gap' or 'gaps' in a strategic sense. Consideration of strategic gaps is also reflected in how the ACT Government considers external factors; where almost 70% of documents referred to external factors outside of the ACT (see more detail in Section 6).

In comparison to strategic gaps, reference to 'opportunity' or 'opportunities' is far more extensive and frequent, mentioned in 87% of documents (n=46). Ten of these documents have thirty or more references to 'opportunity' or 'opportunities', including: *The ACT Housing Strategy*, *Canberra Region Local Food Strategy 2024-2029*, *Carbon Neutral Government Framework Review*, *ACT Climate Change Strategy 2019-2025*, *Establishing Reporting from Regulatory Data Sets for Gas Transition and Electrification Program*, *Climate Change Adaptation Strategy Completion report*, *Energy Efficiency Improvement Scheme Review 2024*, *Canberra Health Services Zero Emissions Pathway Advisory*, *ACT Circular Economy Strategy* and *Canberra A Statement of Ambition*.

Overall, the document cataloguing demonstrates that the ACT consistently seeks to consider gaps and opportunities.

Stakeholder perceptions

There are no formal mechanisms to keep abreast of climate-related developments and capture gaps and opportunities that the ACT could pursue, which is an area of improvement.

However, stakeholders engaged in the review process acknowledged several **gaps and opportunities** for the ACT Government in terms of achieving climate change objectives

Internal stakeholders spoke about opportunities to:

- Improve decision making
 - align all decisions across government with net-zero goals
 - consider economic efficiency
 - allow flexibility so that priorities can shift, including stopping previous work
- Develop a formal adaptation framework for all Directorates to work under
- Develop a central climate action plan and associated report, including:
 - clear and ambitious targets for mitigation and adaptation
 - secured funding allocation
 - integration of learning with annual updates, to reduce the level of reporting

- Improve knowledge of climate change
 - internally – collaborate more with international experts and with staff across Directorates
 - externally – communicate climate change as a human health emergency
- Leverage climate-related financial disclosures to improve public transparency and drive climate action.

External stakeholders spoke about opportunities for the ACT Government to:

- Set more ambitious targets, particularly around adaptation and a just transition
- Work more collaboratively as partners, including when policies and programs are designed (e.g. community groups could be involved in the design of the new Climate Change Strategy). Engagement approaches should be tailored to meet the needs of community members (e.g. consider using place-based approaches, using plain English, reimbursing costs for participation including time and transport costs).
- Share knowledge and learn from each other more
- Adequately resource community organisations, so they can provide adequate support (e.g. immediate help during emergencies)
- Scale up programs aimed at supporting vulnerable communities as the need is larger than the current reach
- Improve the grant process (e.g. allow staff salaries, reduce reporting requirements)
- Amend membership of the Climate Change Council to include a representative from the community sector.

Insights

Considering the strategic gaps and opportunities for the ACT to achieve its climate objectives, requires an understanding of whether there are mechanisms in place to identify gaps and opportunities as well as mechanisms to keep up to date and learn in a rapidly changing environment.

Climate risks and opportunities are not static but evolve. From an adaptation perspective extreme weather events are having severe impacts on urban populations and are often not standalone events, with the impacts felt for months and even years later. A recent example are the floods in Spain's Valencia which demonstrate the devastating impacts of heavy rainfall on the local population as well as the built environment and infrastructure.⁴⁴ From a mitigation perspective we are seeing the development of innovations that present new opportunities to decarbonise economies. We can expect that there will be constant evolution of the risks and opportunities for both adaptation and mitigation over coming years. We have therefore approached this question from the perspective of the systems and processes that facilitate the ACT to be aware, and act on changes.

Of specific relevance to identifying strategic gaps and opportunities is Principle 15 of the C40 Cities Climate Transition Framework, which recommends:

"A system for monitoring, evaluation, reporting and learning (MERL) which includes a set of indicators to assess action implementation and progress at output, outcome and impact level.

⁴⁴ Reuters (2024). *Spaniards brace for fresh storms two weeks after deadly Valencia flood*.
<https://www.reuters.com/world/europe/spaniards-brace-fresh-storms-two-weeks-after-deadly-valencia-floods-2024-11-13/>

...An effective MERL system reports real progress against the city's climate action plan, with a view to continuous improvement, accountability and transparency, acknowledging the diverse range of actors and influences that affect the delivery of urban climate action.

Understanding progress, successes and challenges in the delivery of a city's climate actions will help to enable the city to capitalise on the successes of its implementation and make informed decisions on actions that need adjustment, support, extra finance, collaboration etc. The MERL system also enables transparent communication of progress and challenges to becoming a net zero emissions and climate resilient city, building awareness and engagement on climate change in the city communities."⁴⁵

From our stakeholder engagement it is evident that the ACT is in the fortunate position that it has a depth of climate expertise outside of the ACT Government. This includes Federal Government departments and agencies with climate responsibilities, community groups and the ANU and University of Canberra that both have specialism around climate. There is an opportunity for the ACT to leverage the expertise of its citizens to support identifying and acting on gaps and opportunities. This can be achieved by facilitating the development of a climate ecosystem that would provide a mechanism to leverage the informal networks that already exist across the ACT.

The establishment of a climate ecosystem would not need to be resource intensive if approached from the perspective of a partnership. Section 3.5 proposed a Climate Community Partnership as a mechanism by which this could be formally structured. An ACT Climate Ecosystem could for instance be jointly convened by ANU and University of Canberra, utilising the resources of these institutions to convene regular forums to consider developments that may impact on the ACT's Climate Action Plan. A key purpose of the ecosystem would be to support ACT Government employees to stay abreast of climate changes. Co-benefits of facilitating an ecosystem would be to build the ACT's reputation as a place of climate expertise. This can support climate-related businesses to make the decision to base themselves in Canberra where a deep pool of climate expertise supports future business growth.

We recommend the ACT encourage and facilitate the development of an ACT Climate Ecosystem, which would be an open network of ACT climate experts to support learning linked to MERI frameworks, providing a mechanism to allow climate-related developments to be considered and debated across the ACT. The ACT should establish formal structures to encourage discussion and learning which could include forums and communities of practice. It is important to note that the facilitation of a climate ecosystem is not proposed as an alternative to existing climate governance arrangements including the ACT Climate Change Council. A climate ecosystem could be facilitated through a Climate Community Partnership framework proposed in 3.5. For instance, with support from the ACT Government, a climate ecosystem could be facilitated by community groups working with Canberra based universities. A climate ecosystem could facilitate forums and discussions that could feed into the formal climate governance mechanisms. We would also highlight the opportunity that facilitating a climate ecosystem also supports the establishment of climate businesses in the ACT. The development of ACT's reputation for climate expertise can be an important factor in the decisions on where climate-focused businesses locate. Opportunities include servicing climate intelligence needs across Asia Pacific.

⁴⁵ The differences between MERI and MERL are mostly semantic, where I is Improvement and L is Learning; the terms are effectively interchangeable. We have referred to MERI systems throughout this report except in direct quotes from external sources.

3.5 To achieve net zero targets, the ACT Government can't do it alone. Partnerships with business, community service organisations and responsibility sharing between individuals, community and government is essential. Does the ACT Government have the right partnership and engagement / communication settings?

Effective partnerships are voluntary and collaborative relationships with sharing of risks and responsibilities, resources, benefits and actions. External stakeholders involved in the review did not see themselves as partners with the ACT Government around climate change action. The ACT Government should establish a Climate Community Partnership Framework and should increase financial resourcing of community groups to participate in consultations, manage partnerships and implement MERI practices.

Recognising that...	Recommendations
- Effective partnerships are voluntary and collaborative relationships with sharing of risks and responsibilities, resources and benefits and actions. - External stakeholders involved in the review did not see themselves as partners with the ACT Government around climate change action. - The ACT Government has a role to encourage and promote climate-related public-private and civil society partnerships. - Just over half (57%) of documents involved stakeholder engagement in the formation of the document itself. While consultation is vital, community groups also reflected on the burden this places on already under-resourced organisations. Just over half (53%) of documents referred to First Nations communities, though the level of collaboration and inclusion differed significantly.	Recommendation 2.2 The ACT should establish a Climate Community Partnership Framework as a mechanism to structure collaboration between the ACT Government and community groups. Financial resourcing of community groups should be part of this framework, to support their participation in consultations, management partnerships and implementation of MERI practices.

Document cataloguing

To examine if the ACT has the right partnerships and engagement/ communication settings two criteria were applied to the document sample.

1. The document provides evidence of a stakeholder engagement process and related sub-criteria on which group(s) were engaged and what the engagement process was. Almost 60% of the documents involved stakeholder engagement for the document itself.
2. The document links to First Nations communities (included in 53% of documents).

More detail on the cataloguing can be found below.

Stakeholder engagement

Most documents (57%, n=30) involved stakeholder engagement for the formation of the document itself. Types of stakeholders included: the broader public; politicians; ACT Government staff (both program and policy staff); initiative or program participants, service providers; and business, industry, or subject matter experts.

For types of engagement, workshops (with staff, public or experts) (n=11), interviews (n=11), surveys (n=10) and public consultation (n=7) were most common, while forums, roundtables, community

drop-in sessions, focus groups, meetings, community panels, calls, advisory panels and co-design with a reference group were also used. The Climate Change Strategy 2019-2025 had the greatest engagement reaching more than 65,000 people by social media and engagement events. The ACT Disability Strategy 2024-2033 was arguably the most consultative, as it was co-designed with the Disability Reference Group alongside other engagement activities including workshops, a student voice competition, written submissions and at the ACT Disability Expo. For the strategy, people with a disability facilitated thirty-one events and two were facilitated by family carers.

First Nations communities

53% of documents (n=28) reference First Nations communities. However, the degree of partnership and inclusion differs substantively between documents. Some documents mention Indigenous leadership or that there was a demographic question for First Nations peoples in a survey. Others are far more considered, with the inclusion of at least two First Nations members of the Climate Change Council, inclusion of Indigenous involvement and participation in a policy as a metric, sections on traditional knowledge and the use of native foods or collaborating with Aboriginal and Torres Strait Islander people for resilient communities.

Stakeholder perceptions

The external stakeholders involved in the review did not see themselves as partners with the ACT Government around climate change action (this included ACT environmental groups, the ACT Business Chamber and ACTOSS). From their viewpoint, they were contractors and engaged in transactional relationship.

Areas for improvement from external stakeholders in terms of partnerships and communication included:

- Providing compensation to community organisations for time involved in consultation processes
- Including the community sector in designing new policies and strategies (e.g. the new Climate Change Strategy)
- Allowing staffing to be included in grants received by external stakeholders from government
- Improving co-ordination across government, particularly when consulting with external organisations (e.g. different parts of government should not consult on the same topic with, similar organisations, within a short period of time).
- More communication with the ACT community about the impacts of climate change
- Improving scenario planning to ensure it reflects the predicted reality of life in the ACT when the climate has changed

The internal communications team work closely with policy and program areas to determine key messages about climate change action. In some instances, market research is used to inform key messages. There are also several mechanisms for seeking feedback about relevant issues (e.g. Your Say, consumer energy consortium forum, environment and planning forum).

Arrangements are put in place with other providers on a project-by-project basis. For example, CHOICE was engaged to develop a tool for people to use when making decisions about electrifying

their homes.⁴⁶ The tool allows community members to access information that usually sits behind a pay wall.

Internal government staff recognise an opportunity to increase collaboration with First Nations people in the ACT and members of culturally and linguistically diverse communities.

Insights

Considering whether the ACT Government has the right partnership, engagement and communication settings requires understanding the processes, policies and frameworks that are in place.

The word partnership can have specific meaning depending on the context. We are using a definition of partnership agreed to by the UN General Assembly:⁴⁷

"Partnerships are voluntary and collaborative relationships between various parties, both public and non-public, in which all participants agree to work together to achieve a common purpose or undertake a specific task and as mutually agreed, to share risks and responsibilities, resources and benefits."

Target 17.H of the Sustainable Development Goals, Encourage Effective Partnerships, states, "encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships".⁴⁸

Our interpretation is that effective climate action partnerships require sharing of risks and responsibilities, resources and benefits and actions to encourage and promote. The ACT Government has a role to encourage and promote public-private and civil society partnerships. Establishing a partnership framework is one mechanism through which climate-related community partnerships can be established.

Examples of partnership frameworks for both formal and informal partnerships include:

- The Western Australian Government launched a Communities' Partnership Framework in May 2021 that provides guidelines for establishing and sustaining partnerships with external stakeholders.⁴⁹ The framework outlines a four stage Partnership Lifecycle (Stage 1 Scope, build and plan, Stage 2 Manage and maintain, Stage 3: Review and revise, Stage 4: Sustain, adapt or adjourn).
- The Australian Government established the Family-School Partnerships Framework that was endorsed by Australia's Education Ministers in 2008.⁵⁰

⁴⁶ ACT Government (2024). *Make your next choice electric*. <https://energy.act.gov.au/plan/>

⁴⁷ United Nations Department of Economic and Social Affairs (2015) *Partnership for Sustainable Development Goals: A legacy review towards realizing the 2030 agenda*.

<https://sustainabledevelopment.un.org/content/documents/2257Partnerships%20for%20SDGs%20-%20a%20review%20web.pdf>

⁴⁸ United Nations The Global Goals. *Partnerships for the Goals*. <https://www.globalgoals.org/goals/17-partnerships-for-the-goals/>

⁴⁹ Government of Western Australia Department of Communities (2021) *Communities' Partnership Framework*. <https://www.wa.gov.au/system/files/2021-05/Communities-Partnership-Framework.pdf>

⁵⁰ Australian Government Department of Education (2020) *Family-School Partnerships Framework*. <https://www.education.gov.au/supporting-family-school-community-partnerships-learning/family-school-partnerships/family-school-partnerships-framework>

- The NSW Government established a NSW Community Housing Partnership Framework that sets out objectives and principles to guide transactions with registered community housing providers for the delivery of social and affordable housing infrastructure and services.⁵¹
- Grampians Health established a Consumer Partnership Framework to support consumer engagement across the organisation.⁵²

The current arrangements between the ACT Government and community groups are contractual. Stakeholder engagement revealed a clear and consistent message that ACT's community groups feel that current arrangements place an administration burden that is difficult to manage with existing resources. The contractual nature of agreements means that the efforts that community groups make to respond to submissions and requests come at their own expense. The current arrangements cannot be considered a partnership in the UN definition of the word. The current arrangements are not collaborative relationships and there is no agreement to share risks and responsibilities, resources and benefits.

The benefit of establishing a partnership framework that explicitly focuses on climate change is to provide a mechanism to shift from the current contractual arrangements to genuine partnership. A partnership framework would be a guiding document that would support community groups to negotiate individual partnerships with the ACT Government. The agreements would support the financial sustainability of community groups. The benefit of having vibrant, financially sustainable climate community groups would include supporting the ACT to manage extreme weather events.

It is recommended that the ACT Government establish a Community Climate Partnership Framework. This Framework should explicitly recognize the financial constraints facing not-for-profit community groups. Mechanisms to financially support community groups should be considered.

As outlined in 3.4 a Community Climate Partnership Framework could work in conjunction with a climate ecosystem. For instance, with support from the ACT a Community Climate Partnership Framework could provide a mechanism to support a climate ecosystem through community groups working with Canberra based universities.

⁵¹ NSW Community Housing Industry Council (2022). *NSW Community Housing Partnership Framework*. <https://dcj.nsw.gov.au/documents/community-inclusion/advisory-councils/chic/community-housing-partnership-framework-august-2022.pdf>

⁵² Grampians Health Ballarat (2023) *Consumer Partnership Framework*. <https://www.bhs.org.au/for-patients-families-friends/consumer-partnership-program/consumer-partnership-framework>

3.6 What are the key external factors that create opportunities, risks or uncertainties for ACT Government actions? For example, how might Commonwealth or other jurisdictions' strategies and progress impact the ACT's ability to deliver emissions reductions? How does the impact of social and wellbeing strategies and progress impact the ACT's ability to deliver emissions reductions (e.g. housing, cost of living, food insecurity)?

The scope of this review does not allow the identification of individual external factors that create opportunities, risks or uncertainties for the ACT. External factors impacting the ACT are likely to constantly change and evolve overtime. The establishment of a Climate Action Plan and ACT Climate Ecosystem through a Climate Community Partnership Framework would provide the ACT with a structural mechanism to keep abreast of climate-related developments. A key consideration is whether delivering social and wellbeing strategies for ACT residents comes at the expense of delivering climate action. It cannot be said that a trade-off between action on wellbeing and climate action exists in all cases. The ACT should seek to identify and prioritise opportunities where social and wellbeing strategies and climate actions can deliver co-benefits. This can be achieved through greater intersection between the ACT's Wellbeing Framework and the proposed Climate Action Plan.

Recognising that...	Recommendations
- Climate change is subject to both physical and transition risks that are subject to constant change. Given the multitude of external factors and the dynamic nature of climate change and climate action, the challenge is to establish systems and processes to keep abreast of the external factors and to consider them in climate change action, including strategy reviews. - A key consideration is whether delivering social and wellbeing strategies for ACT residents comes at the expense of delivering climate action. It cannot be said that a trade-off between action on wellbeing and climate action exists in all cases.	Recommendation 2.5 The ACT Government should identify and prioritise opportunities for social and wellbeing strategies to align with climate actions to deliver co-benefits. This will require collaboration and cohesion between the ACT's Wellbeing Framework and the Climate Action Plan.

Document cataloguing

To examine key external factors that create opportunities, risks or uncertainties for the ACT Government, one criterion was examined. Almost 70% of documents refer to external factors outside of the Territory that impact on ACT Government actions. To examine the impact of social and wellbeing strategies on the ACT's ability to deliver emissions reduction, one criterion and additional text analysis was applied to the document sample. Regarding explicit references, the Wellbeing framework was mentioned in thirteen documents. At a broader level, most documents reflected the environment and climate domain. More detail on the cataloguing can be found below.

External factors

Almost 70% (n=36) documents refer to external factors outside the ACT impacting on ACT Government actions. To qualify documents needed to go beyond listing international partnerships or different policies in other jurisdictions but needed to explicitly state how this impacted ACT policy. The external factors in the documents reviewed fell into six broad categories: Federal policy, cross-jurisdictional collaboration and alignment, funding sources, international and national best practice, global and Australia-wide influences, and other national regulatory bodies. See a more detailed breakdown in Table 5.

Table 5: External factors noted in document cataloguing exercise

Area	Description
Federal policy	Alignment with Federal policies, advocacy on national policy platforms, Federal requirements on states/territories (e.g. Territory wide risk assessment), uncertainty over differing responsibility (i.e. labelling electric vehicles), ACT participation in national committees and working groups, impact of policies on ACTs work (e.g. updated Land use, land-use change, and forestry (LULUCF) calculation method carried across to ACT, Safeguard Mechanism, Capacity Investment Scheme etc.).
Other national regulatory bodies	Clean Energy Regulator inspections, recommendations by the Australian Energy Market Commission surrounding smart meters, CSIRO developed guide utilised by EPSDD.
Cross-jurisdictional collaboration and alignment	Particularly with the NSW government (waste management, circular economy, EV charging infrastructure, emergency management and arrangements, resource management (e.g. Murray Darling River)), cross-jurisdictional data sharing, collaboration on car registration
Funding sources	Federal and foreign investment, funding from government bodies (e.g. ARENA), Federal funding (advocacy for Federal funding, cuts meaning ACT needs to cover the shortfall, funding that enables projects, the Disaster Ready Fund etc).
International and national best practice	As far as practicable ensure consistency with international and national best practice (offsets, targets for GHG emissions, measuring GHG emissions), consideration of national and international work and the gaps to fill.
Global and Australia-wide influences	Such as COVID-19, dependence on international and national supply chains and the impacts of extreme weather on these suppliers, consideration of various industries' status in Australia/globally and technology maturity (e.g. biogas, biomass etc., net zero procurement for building and construction methods), zero emissions vehicle market, demand and development.

Wellbeing Framework and a just transition

The term 'wellbeing' is referred to in 57% of documents (n=30), while the *Wellbeing Framework* was mentioned in just thirteen documents, nine of which are strategic documents. An example is the *ACT Disability Strategy 2024-2033* which states, "the Strategy and accompanying action plans will focus on achieving outcomes against each wellbeing domain."

Other documents such as the *Canberra Region Local Food Strategy 2024-2029*, *Active Travel Plan 2024-2030* note the related wellbeing domains for the respective strategies. The PAGA agreed to establish seven Standing Committees, aligned with the wellbeing indicators. Two documents include the wellbeing framework/specific indicators and domains as an assessment against broader ACT goals,

while another considers climate-related risks on wellbeing domains and identifies the indicators which face the most risks.

Aside from the three strategies which directly link to wellbeing domains, other documents' domains have been inferred from their content. In order of most to least occurring for each of the domains: Environment and climate (n=49), Governance and institutions (n=37), Housing and home (n=29), Living standards (n=27), Economy (n=26), Access and connectivity (n=24), Health (n=20), Education and lifelong learning (n=19), Safety (n=13), Social connection (n=9), Identity and belonging (n=4), and Time (n=3).

The *Climate Change Strategy 2019-2025* also aims "for a just transition to net zero emissions that supports the most vulnerable in our community", noting in particular a just transition for workers and support for vulnerable households as two specific goals.

Stakeholder perceptions

External factors

Notwithstanding climate governance structures including the ACT Climate Change Council and, some stakeholders felt that keeping abreast of external factors is up to individuals' own drive and enthusiasm. This was more apparent in areas where climate was not the central responsibility and where climate activities need to align with other operational priorities. Staff reported that keep abreast of climate risks and opportunities by:

- Engaging with working groups and government agencies with other jurisdictions, but this can increase workload
- Assessing policies from other areas for their impact on the ACT (e.g. Commonwealth policies)
- Developing program logic models and considering risks / external factors as a part of this process

Wellbeing

Internal stakeholders commented that Well-being Impact Assessments (WIA) (using the ACT Wellbeing Framework) are required in some instances, particularly for budget business cases / cabinet packages. Stakeholders also commented that the WIA is often not considered at the beginning of the proposal development stage but can be treated as a last minute 'tick the box' exercise.

They spoke generally about trading off investments when decisions are made at Expenditure Review Committee level (e.g. should we spend on hospitals or climate related activities).

External community organisations spoke about the need to invest in supporting vulnerable communities manage the impacts of climate change, including wellbeing at times of climate related extreme events.

Considering the key external factors that create opportunities, risks or uncertainties for ACT Government actions requires understanding the processes, policies and frameworks that are in place to systematically identify risks and opportunities.

Insights

Climate change is subject to both physical and transition risks. Given the multitude of external factors and the dynamic nature of climate change and climate action, the challenge is to establish systems and processes to keep abreast of the external factors and to consider them in climate change action, including strategy reviews.

As identified in Section 3.2, mechanisms such as the Network for Greening the Financial System have been established to support the consideration of climate scenarios that aim to provide a common and up-to-date reference point for understanding how climate change (physical risk) and climate policy and technology trends (transition risk) could evolve in different futures. We have recommended (Section 3.2) that the ACT establish a Climate Action Plan which should be regularly updated. The establishment of a Climate Action Plan would provide the ACT with a structural mechanism to keep abreast of climate action developments.

Whilst there are formal climate governance mechanisms including the ACT Climate Change Council, and participation in various climate working groups, there are limited mechanisms for ACT Government employees to learn about external climate developments. There is currently a reliance on motivated staff to maintain connections and knowledge. In this regard the ACT is fortunate that it has access to a climate community with deep climate expertise. The ACT Government can strengthen the depth of its climate expertise through partnerships with not-for-profit community groups who need to be financially compensated. See 3.5 for further discussion.

State Government Developments

Whilst this report does not seek to identify all the external factors that are of relevance to the ACT, climate action initiatives of other state/territory governments are worthy of note. State Governments are constantly evolving their practices and investing in initiatives, some of which may provide opportunities for the ACT to leverage.

NSW

The NSW Government is requiring NSW Government reporting entities to make comprehensive climate-related financial disclosures aligned with the Australian Accounting Standards Board (AASB)'s Australian Sustainability Reporting Standard (ASRS) – AASB S2 Climate-related Disclosures.

Reporting entities in year 1 include Department of Climate Change, Energy, the Environment and Water; Department of Communities and Justice; Department of Creative Industries, Tourism, Hospitality and Sport; Department of Customer Service; Department of Education; Department of Planning, Housing and Infrastructure; Department of Primary Industries and Regional Development; Environment Protection Authority; Essential Energy; Forestry Corporation of New South Wales; Ministry of Health; New South Wales Land and Housing Corporation; New South Wales Treasury Corporation; NSW Police Force; Sydney Trains; Sydney Water Corporation; Transport for NSW; University of New South Wales and University of Sydney.⁵³

NSW's strategy of requiring Government departments and agencies to produce climate-related financial disclosures will provide a structural mechanisms to stay up to date with developments.

Victoria

The Victorian Government has prepared Adaptation Action Plans (AAPs) across seven systems to ensure Victoria's climate resilience, now and in the future.⁵⁴ An example is the Education and Training Adaptation Action Plan with key actions:

⁵³ NSW Treasury (2024) *Climate-related Financial Disclosures*. <https://www.treasury.nsw.gov.au/climate-related-financial-disclosures>

⁵⁴ Victoria State Government Energy, Environment and Climate Action (2022) *Adaptation Action Plans*. <https://www.climatechange.vic.gov.au/building-victorias-climate-resilience/our-commitment-to-adapt-to-climate-change/adaptation-action-plans-a-major-step-forward-for-climate-resilience-in-victoria>

- Improving educators' and learners' ability to understand climate risk and embed adaptation in their everyday decisions.
- Identifying climate risks to the school asset portfolio and integrating adaptation into Victorian School Building Authority policies.
- Investigating how the early childhood education sector can be supported to build the climate resilience of early learning and kindergarten infrastructure and operations.
- Preparing a plan to address thermal comfort-related climate change impacts in Victorian Government schools.
- Making assets more resilient by incorporating locally tailored training and resources (such as flood overlays, temperature and rainfall projections) into land use planning, site selection for education services, and capital works.
- Working with adult, community and further education providers to identify climate change-related learning barriers and build adaptation knowledge and skills.⁵⁵

The Victorian Government's adaptation plans provide a case study for the ACT in developing its own enhanced adaptation targets.

Queensland

The Queensland Government has developed two mapping tools to help industry sectors and government plan for the heat impacts caused by climate change. The mapping tool shows the urban parts of 27 local government areas in Queensland. The Government's Urban Heat Map provides projections for local urban temperatures and the thermal comfort for the people that live there. The map projects what urban heat is expected to be in 2030, 2050, 2070 and 2090.⁵⁶

The Queensland Government's mapping tools illustrate how practical data sets can be developed that support adaptation targets.

South Australia

The South Australian Government introduced the Climate Change and Greenhouse Emissions Reduction Act – Draft Amendment Bill to the South Australian Parliament on 29 August 2024. The Bill proposes preparation of a state-wide emissions reduction plan and a state-wide climate risk assessment to identify climate related risks and opportunities and inform adaptation planning.⁵⁷

South Australia's evolving approach to climate risk assessments to inform adaptation planning may provide insights for ACT's own investigation of adaptation targets.

Western Australia

⁵⁵ Victoria State Government Energy, Environment and Climate Action (2022) *Education and Training Adaptation Action Plan - a snapshot*. <https://www.climatechange.vic.gov.au/building-victorias-climate-resilience/our-commitment-to-adapt-to-climate-change/education-and-training-adaptation-action-plan>

⁵⁶ Queensland Government Department of Energy and Climate (2024) *Mapping heat impacts*. <https://www.energyandclimate.qld.gov.au/climate/climate-analytics-reporting/mapping-heat-impacts>

⁵⁷ Government of South Australia Department for Environment and Water (2024) *Climate Change and Greenhouse Emissions Reduction Act - Draft Amendment Bill*. <https://www.environment.sa.gov.au/topics/climate-change/climate-change-legislation>

Western Australia's Climate Science Initiative produces high resolution climate projections to help Western Australians adapt to our changing climate.⁵⁸ Western Australia's Climate Adaptation Strategy sets out 37 comprehensive actions to support and accelerate climate adaptation across the state, including modelling urban heat island effects and support climate adaptation research on Western Australia's biodiversity.⁵⁹ Western Australia's approach to supporting climate science has the capacity to deliver insights around biodiversity initiatives that can be linked into adaptation targets.

Reflecting stakeholder feedback that adaptation targets need to be prioritized in light of the reality that climate impacts are already being experienced, and acknowledging that the ACT's adaptation actions are embedded in the *ACT Nature Conservation Strategy* and *Canberra's Living Infrastructure Plan: Cooling the City*, there is an opportunity to consider the way in which other jurisdictions are establishing their own adaptation targets that reflect their unique circumstances. The Department of Climate Change, Energy, the Environment and Water (DCCEEW) argue that successful climate adaptation should:

- be place-based, community-led and values-driven – tailored to the affected areas and communities
- involve everyone – governments, households, businesses and community organisations all have a role
- be underpinned by science and analysis – to make decisions, prioritise adaptation actions, and choose the best response.⁶⁰

Whilst the example of state government climate initiatives represents only a small portion of recent external developments it illustrates that climate actions are not static but continue to evolve. An example of an external factor that is receiving prominence as a result of increased understanding of its importance to decarbonization is embodied carbon which is the emissions that come from building materials, transport, construction, repairs, and renovations. Embodied carbon from building activity contributed 10% of national carbon emissions in 2023, with upfront carbon contributing 7%.⁶¹ The ACT has taken a leadership position proposing updates to the National Construction Code to bring every state and territory under the same system to start measuring carbon emissions in construction of commercial buildings.⁶² Ministers have agreed to include a voluntary pathway for commercial buildings to calculate and report on embodied carbon in the 2025 National Construction Code, with the Australian Building Codes Board tasked to investigate how to incorporate a future minimum standard in the NCC 2028.⁶³

⁵⁸ Government of Western Australia (2024) *Climate Science Initiative*.

<https://www.wa.gov.au/organisation/departments/departments-of-water-and-environmental-regulation/climate-science-initiative>

⁵⁹ Government of Western Australia (2024) *Climate Adaptation Strategy*.

<https://www.wa.gov.au/service/environment/environment-information-services/climate-adaptation-strategy>

⁶⁰ <https://www.dcceew.gov.au/climate-change/policy/adaptation>

⁶¹ <https://www.infrastructureaustralia.gov.au/reports/embodied-carbon-projections-australian-infrastructure-and-buildings>

⁶²

https://www.cmtedd.act.gov.au/open_government/inform/act_government_media_releases/vassarotti/2024/act-government-leads-the-way-to-net-zero-carbon-in-construction-in-australia

⁶³ <https://www.minister.industry.gov.au/ministers/husic/media-releases/building-ministers-back-greater-climate-resilience-australian-buildings>

Wellbeing

Consideration of how social and wellbeing strategies that focus on issues including housing, cost of living and food insecurity impact on the ACT's ability to deliver emissions reductions require an understanding of concepts around just transition.

The term 'just transition' originally arose out of trade union concerns in the 1970s to reconcile environmental and social issues.⁶⁴ Over the last decade it has come to be broadly defined as "ensuring that no one is left behind or pushed behind in the transition to low-carbon and environmentally sustainable economies and societies, can enable more ambitious climate action and provide an impetus to attaining the Sustainable Development Goals".⁶⁵

A key consideration is whether delivering social and wellbeing strategies for ACT residents comes at the expense of delivering climate action.

A case study to illustrate the co-benefits that can be derived from investing in climate action is affordable housing. The NSW Productivity Commission's 2023 report, *Building more homes where people want to live*, argued that the greatest effect on house prices could be achieved with a planning process that increases housing density in areas of highest demand. According to the NSW Productivity Commission building more houses where people want to live could be achieved by:

- Raising average apartment heights in suburbs close to the CBD and job opportunities
- Allowing more development near transport hubs to leverage existing infrastructure capacity
- Encouraging townhouses and other medium-density development.⁶⁶

Increased housing density with access to fast, frequent and reliable zero carbon transport options, not only provides benefits for housing, but also for cleaner transport. The Climate Council argue that to decarbonise the transport sector, "the way we get around must transform from the majority of trips occurring via private vehicle to most happening on public transport or in an active way (such as walking, bike riding, scooting and rolling). This is also known as 'mode shift'".⁶⁷

Allowing more development near transport hubs, which is proposed by the NSW Productivity Commission as a solution to make housing more affordable, is also a solution to climate mitigation. This is not to say that the delivery of social and wellbeing strategies may not involve an opportunity cost with delivering climate action. However, **it cannot be said that a trade-off between action on wellbeing and climate action exists in all cases.**

There is an opportunity to find social and wellbeing actions and climate action that deliver co-benefits. This can be achieved through the intersection between the ACT's Wellbeing Framework and the proposed Climate Action Plan. An ACT Climate Action Plan should explicitly seek opportunities to align social and wellbeing strategies to deliver co-benefits to the ACT community.

⁶⁴ Gerrard, E., & Westoby, P. (2021). What Is a Just Transition?. *Coal and Energy in South Africa*, 22.

⁶⁵ United Nations Committee for Development Policy (2023) *Just Transition*. <https://www.un.org/development/desa/dpad/wp-content/uploads/sites/45/CDP-excerpt-2023-1.pdf>

⁶⁶ NSW Government Productivity and Equality Commission (2023) *Building more homes where people want to live*. <https://www.productivity.nsw.gov.au/building-more-homes-where-people-want-to-live>

⁶⁷ Climate Council (2023) *Shifting Gear: The Path to Cleaner Transport*. https://www.climatecouncil.org.au/wp-content/uploads/2023/05/CC_MVSA0354-CC-Report-Road-to-Personal-Transport_V5-FA-Screen-Single.pdf

3.7 Are monitoring, evaluation, reporting and improvement (MERI) processes in place and appropriate? What are the risks, gaps and opportunities in evaluation and reporting?

Currently, MERI practices vary within and between Directorates. We recommend the responsibility of enhancing MERI practices be centralized within a government area that spans all Directorates. Formal structures should be established to foster learning. Additionally, we recommend a needs analysis be conducted to understand the reasons why MERI is not consistently used. Behaviour change theory should then be used to inform the design of effective evaluation capacity building programs.

Recognising that...	Recommendations
- Fewer documents have an intentional overarching MERI approach (28% of documents), compared to disparate MERI practices (at least 75% of documents). - MERI practice varies within and between Directorates. - There is more emphasis on monitoring and reporting, whereas evaluation and learning are less prominent. - The ACT Government Evaluation Policy and Guidelines has not been updated since 2010. - There is no report that brings together all the work on climate change in the ACT (noting that the Minister's report on Climate Change is an attempt to do so, but it does not capture all climate action in the ACT). - The knowledge of external stakeholders could be harnessed further to enhance the design and delivery of climate change action. - Drawing upon behaviour change theory could help design an effective strategy; e.g. the COM-B model prompts thinking about capability, opportunity and motivation to achieve the desired behaviour.	Recommendation 2.3 The responsibility for embedding and strengthening MERI practices should sit with an area of ACT Government that has capacity to influence practice across all Directorates. Recommendation 2.4 The design of effective MERI strategies, integrated into the Climate Action Plan, should draw on behaviour change theory.

Document cataloguing

To examine whether MERI processes are in place and appropriate, documents were reviewed for evidence of existing MERI arrangements. Over 80% of documents provided evidence of MERI practices.

Over 80% of documents (n=43) provide evidence of MERI practices. 75% (n=40) provide evidence of improvement/learning practices. Both documents that had small examples of MERI/L practices and documents that had an explicit overarching MERI framework were included. Considering only the latter, the numbers drop significantly. When looking at explicit plans for a MERI/L activities: 15 documents have monitoring practices, 12 documents have evaluation practices, 14 documents have reporting practices, and just 3 have improvement/learning practices.

It is important to note that it is mostly strategic documents which would set out an overarching MERI approach. For example, of the 15 documents that had overarching monitoring practices, 12 of the documents are strategic documents, the remaining documents were: *Territory Wide Risk Assessment 2017*, *Monitoring and evaluation plan for the home energy efficiency program*, and the *Climate Change Adaptation Strategy Completion Report*. There were also 9 reviews/evaluative documents that were required by an Act, or a commitment from a strategy and each reflected all of the MERI practices.

The *Canberra Region Local Food Strategy 2024-2029* is a good example of embedding MERI practices and has a MERI plan for the strategy's implementation.

Stakeholder perceptions

Internal government staff spoke about a general commitment to MERI practices, but said they are not always undertaken consistently. Differences occur both within and between Directorates, with some staff saying it was embedded in their work, and others saying the opposite.

Sometimes MERI practices are planned but not always undertaken. Funding can be an issue with MERI sometimes included in business cases but then removed to reduce costs. Sometimes staff move on to start new work before the post implementation reviews are completed. Stakeholders said that having measurable KPIs in relevant corporate plans increases the likelihood that MERI will be completed.

External stakeholders also spoke about lack of funding to evaluate their work, within the budget of their government grants.

Staff provided examples of MERI, in Cabinet (where outstanding actions and decisions are monitored) and with specific projects and policies (e.g. a project about insulation for rental properties, ACT No Waste project, preventative health policy).

The Communications and Engagement team use evidence to plan their work. For example, the Communications and Engagement team use market research to help design campaigns and regular surveys of community members. E.g. a phone survey is conducted in April and August each year of 1000 residents and the main winter campaign is conducted between the two survey dates. A community survey is also conducted each year to understand the priorities of people living in the ACT.

Some staff also commented that monitoring and reporting are often higher priorities than learning and acting on the MERI findings.

The ACT Government Evaluation Policy and Guidelines have not been updated since 2010.⁶⁸ However, some support is available to staff to undertake MERI. For example, the Chief Minister, Treasury and Economic Development Directorate (CMTEDD) has supported an Evaluation and Evidence Academy for staff, annually since 2021. The Academy aims to improve the practice and culture of evidence-based decision-making in the ACT public service. It is designed to enable participants to inform and train others in their respective work areas – and potentially run future workshops themselves. The focus is on supporting the implementation of the ACT Wellbeing Framework.

Each year, 20-25 participants complete the program. The program, which is a mix of workshops, coaching and an applied workplace project, is run by Dr George Argyrous and Dr Duncan Rintoul on behalf of CMTEDD, through a partnership with the UTS Institute for Public Policy and Governance.

Insights

To consider whether monitoring, evaluation, reporting and improvement (MERI) processes are in place and appropriate there is a need to understand how well-designed processes are and to what extent do they support people to evaluate their work.

⁶⁸ ACT Government (2010) *ACT Government Evaluation Policy and Guidelines*.
http://www.cmd.act.gov.au/__data/assets/pdf_file/0004/175432/ACT-Evaluation-Policy-Guidelines.pdf

An example of a best practice monitoring, evaluation, reporting and improvement (MERI) process is the C4o.⁶⁹ According to C4o, a climate action planning monitoring, evaluation and reporting system enables a city to track and review the intended results and real progress from a Climate Action Plan. C4o use the following definitions of monitoring, evaluation and reporting:

- Monitoring: Continuous, systematic collection of data on specified indicators.
- Evaluation: The process by which a city assesses and understands changes identified over time, in line with the indicators and against a baseline. This is done to assess the impact of actions, and to review and update the actions and resource allocation plans, to ensure efficient and effective delivery of the CAP.
- Reporting: Presenting data and analysis to stakeholders for information, decision making, or knowledge sharing.

A MER system should be based on a meaningful evidence base that can consist of quantitative and qualitative indicators. C4o define indicators as:

- Quantitative: reported as numbers, such as units, proportions, rates of change or ratios. Example: number of kilometres of (segregated) cycle lanes.
- Qualitative: reported as words, in statements, paragraphs and reports. Example: perceptions of cycling safety from in depth interviews. These indicators can help tell a narrative around progress or impact using examples, a case study or even a quote which can be powerful in its own right.

An evaluation process as part of a MER system is key to identifying gaps and opportunities. According to C4o, "evaluation takes a critical look at the actions to improve their impact. The ideal outcome of evaluation is therefore creating recommendations to improve the design and implementation of adaptation actions, policies and processes. This can enable the city to revise the allocation of resources and gain a deeper understanding of the problem. It can also help to find the causal chains of effects and the intervention logic, the action's implementation processes, and the suitability of policy tools used to address the problem. Furthermore, evaluating one action may also enable the city to identify lessons that can be applied to other actions within the same city or other cities (if the evaluation results are shared). Hence, evaluation goes deeper than monitoring to assess causality between the action and the effects observed".⁷⁰

To increase the consistent use of solid MERI practices across the ACT Government, a concerted effort is needed. **It is recommend assigning responsibility to an area of government that sits across all Directorates.**

For the ACT to understand the impact of all the climate change work, all actions need to align to shared outcomes and to tell a coherent story. The Climate Action Plan could be a place to bring this all together. A suggested approach is:

1. Develop a draft Climate Action Plan
2. Develop an associated MERI Framework and, through this process, consider alignment of actions to desired outcomes
3. Finalise the Climate Action Plan.

⁶⁹ C4o Knowledge (2020) *Monitoring, evaluation and reporting guidance for climate action planning teams*. https://www.c4oknowledgehub.org/s/article/City-CAP-Monitoring-Evaluating-and-Reporting-MER-Guidance?language=en_US

⁷⁰ C4o Knowledge (2024) *Climate Action Planning Guide: How to set up monitoring, evaluation and reporting for your city's climate action plan* https://www.c4oknowledgehub.org/s/guide-navigation?language=en_US&guideRecordId=a3t1Q0000007IEWQAY&guideArticleRecordId=a3s1Q0000001aiaQAA

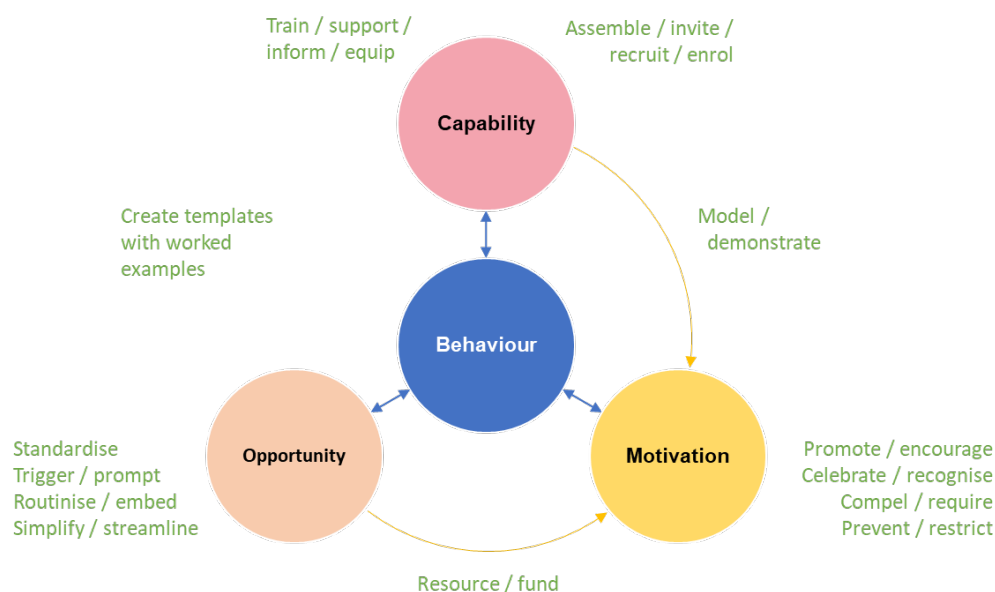
Not all actions need to be evaluated to the same extent. Taking a **risk-based approach** may be useful, where evaluation efforts are prioritised using a set of criteria (e.g. more evaluation effort might be needed for actions where the outcomes are less predictable, high risk, high cost, novel approaches used, or where the ACT is particularly curious about the outcomes).

Whilst we find that **MERI practices** are patchy, we have little visibility of the underlying reasons, therefore further investigation is needed. Once the underlying reasons are determined, an effective approach could be designed using behaviour change theory. One theory that has been used in other jurisdictions⁷¹ is the COM-B model⁷², as illustrated in Figure 3, which prompts thinking about capability, opportunity and motivation to achieve the desired behaviour (in this case, undertaking MERI).⁷³

- **Capability** refers to the physical and psychological abilities that enable an individual to perform the behaviour, such as having the necessary skills and knowledge.
- **Opportunity** includes external factors that make the behaviour possible or prompt it, including external context and social influences.
- **Motivation** involves all brain processes, reflective and automatic, that energise and direct behaviour, like intentions, beliefs, emotions, and habits.

For example, if capability is determined to be lacking, efforts to train people could be increased. If there is a deficit of motivation, efforts to motivate / encourage people could be trialled.

Figure 3: COM-B model of behaviour change applied to evaluation capacity building



Source: *Practical Evaluation Capacity Building*, Australian Evaluation Society workshop delivered by Duncan Rintoul and Vanessa Hood, Rooftop Social

⁷¹ Rintoul, D. (2019) Evaluation capacity building in the NSW Department of Education: The story so far. *Australian Educational Leader* 41(1).

⁷² <https://thedeclaration.com/reference-guide/organizational-behavior/the-com-b-model-for-behavior-change>

⁷³ Michie, S., van Stralen, M. M. & West, R. (2011) The behaviour change wheel: A new method for characterising and designing behaviour change interventions. *Implementation Science*, 6: 42.

4 Conclusion

This review investigates the appropriateness of overarching frameworks and is able to draw conclusions about the appropriateness and effectiveness of climate actions in the ACT only where relevant evaluation findings are available.

The review concludes that the ACT has strong foundations to deliver net zero emissions and strengthen climate resilience. The review found that the strong community support for climate action across a majority of the ACT is a major asset.

Two overarching recommendations are made:

1. To create a Climate Action Plan as a regularly updated, expanded version of the current Climate Change Strategy.

This Climate Action Plan should:

- update the ACT's climate vision, consistent with climate science and the Paris Agreement 1.5°C ambition
- consolidate all relevant targets and goals
- incorporate annual climate-related financial disclosure statements and integrate financial considerations into government climate-related decisions
- be established as a legislative requirement, through an amendment to the Climate Change and Greenhouse Gas Reduction Act 2010.

2. To create structures that facilitate coordination, the building of partnerships, the sharing of expertise and involvement from the broader ACT community.

Key focus areas here include:

- embedding learning and improvement practices into ACT climate actions, not just monitoring and reporting
- establishing an ACT Climate Ecosystem as an open network of climate experts, to leverage the depth of climate expertise across the ACT
- developing intentional structures that encourage discussion and learning, e.g. forums, MERI champions and communities of practice
- establishing a Climate Community Partnership Framework to help formalise and resource collaboration between the ACT Government and community groups
- strengthening climate action-related MERI practices across all Directorates
- identifying and prioritising opportunities for social and wellbeing strategies to align with climate actions to deliver co-benefits.

The project team recommend that these actions be considered in the next phase of climate planning for the ACT Government in 2025. These actions can be taken forward for further consideration as to resourcing and analysing the short and long term benefits of implementation across the ACT Government.

Appendix A: Alignment between C4o Framework criteria, evaluation questions and cataloguing questions

C4o Framework criteria	Evaluation question from RFQ	Criteria
1 Public commitment by current mayor (or city leadership) to take urgent and equitable action	1. Does the ACT Government have an appropriate vision and direction setting on climate change that considers the broader climate action agenda?	3. EVIDENCE - VISION Does the document provide evidence of a vision and commitment to act on climate change?
2 Climate commitments and considerations are embedded into internal governance and decision-making structures	3. Are climate change impacts considered and embedded into key government decisions, work and practices? If not, how and where can they be embedded?	1. GOVERNANCE Does the document provide evidence of governance processes? May not be relevant to all types of documents.
3 Engagement with diverse stakeholders	5. To achieve net zero targets, the ACT Government can't do it alone. Partnerships with business, community service organisations and responsibility sharing between individuals, community and government is essential. Does the ACT Government have the right partnership and engagement/communication settings?	Cataloguing question is N/A – stakeholder engagement will be used
4 Collaboration and partnerships are established with external stakeholders		
5 Evidence and analysis to support the identification of adaptation strategies and actions that collectively achieve the city's goals and targets around building <i>climate resilience and reducing vulnerability</i> .	1. Does the ACT Government have an appropriate vision and direction setting on climate change that considers the broader climate action agenda? 6c. To what extent has Government's adaptation efforts met its goals and targets (to evaluate sufficiency of goals and targets and sufficiency of adaptation efforts). What are the gaps and opportunities to enhance fostering climate resilience in our assets, services, and operations?	3. EVIDENCE – ADAPTATION Does the document provide evidence of adaptation strategies to boost climate resilience and reduce vulnerability?
6 Evidence and analysis to support the identification of <i>mitigation strategies</i> and actions to reduce emissions <i>within and beyond the city boundary</i> to achieve net zero emissions.	1. Does the ACT Government have an appropriate vision and direction setting on climate change that considers the broader climate action agenda?	3. EVIDENCE - MITIGATION Does the document provide evidence of mitigation strategies that expand beyond ACT?
7 Evidence that sectoral and socio-economic data, with a focus on equity,	1. Does the ACT Government have an appropriate vision and direction setting on climate change that considers the broader climate action agenda?	3. EVIDENCE Does the document

C4o Framework criteria	Evaluation question from RFO	Criteria
have informed decision making on targets, strategies and actions.	7. How does the impact of social and wellbeing strategies and progress impact the ACT's ability to deliver emissions reductions (e.g. housing, cost of living, food insecurity)?	provide evidence of economic data?
8 Short, medium and longer term city-wide adaptation goals and targets to build resilience and reduce vulnerability, informed by the evidence base and latest climate science.	1. Does the ACT Government have an appropriate vision and direction setting on climate change that considers the broader climate action agenda? 6c. To what extent has Government's adaptation efforts met its goals and targets (to evaluate sufficiency of goals and targets and sufficiency of adaptation efforts). What are the gaps and opportunities to enhance fostering climate resilience in our assets, services, and operations?	Cataloguing question is N/A – stakeholder engagement will be used
9 Short, medium and longer term city-wide <i>net zero emission reduction targets</i> , informed by the evidence base and latest climate science.	1. Does the ACT Government have an appropriate vision and direction setting on climate change that considers the broader climate action agenda?	4. TARGETS Does the document have a short, medium and long term reporting targets?
10 Short, medium and longer term goals and targets to ensure that climate action improves social, environmental and economic equity.	1. Does the ACT Government have an appropriate vision and direction setting on climate change that considers the broader climate action agenda? 7. How does the impact of social and wellbeing strategies and progress impact the ACT's ability to deliver emissions reductions (e.g. housing, cost of living, food insecurity)?	5. WELLBEING FRAMEWORK Does the document link to the ACT wellbeing framework?
11 Sector-specific strategies that together achieve the city-wide adaptation, net zero GHG emissions and equity goals and targets.	2. Are the existing strategic plans deemed appropriate and effective to meet the government vision on climate change? 4. The findings from the latest emissions projections modelling suggest that there may be challenges for the ACT to meet interim and net zero targets under the existing policy settings. What are the strategic gaps and opportunities to help achieve our interim and net zero targets, and climate resilience objectives? 6c. To what extent has Government's adaptation efforts met its goals and targets (to evaluate sufficiency of goals and targets and sufficiency of adaptation efforts). What are the gaps and opportunities to enhance fostering climate resilience in our assets, services, and operations?	6. SECTOR FOCUS Does the document focus on an individual sector?

C4o Framework criteria	Evaluation question from RFQ	Criteria
1 Adaptation and 2 mitigation actions that are directly linked to the evidence base, goals and targets, and demonstrate use of all possible city powers, partnerships and influence.	1. Does the ACT Government have an appropriate vision and direction setting on climate change that considers the broader climate action agenda? 2. Are the existing strategic plans deemed appropriate and effective to meet the government vision on climate change? 4. The findings from the latest emissions projections modelling suggest that there may be challenges for the ACT to meet interim and net zero targets under the existing policy settings. What are the strategic gaps and opportunities to help achieve our interim and net zero targets, and climate resilience objectives? 6a. Are the programs, policies, services, budget and resource allocations considered appropriate and effective in meeting the government vision on climate change? 7. What are the key external factors that create opportunities, risks or uncertainties for ACT Government actions? For example, how might Commonwealth or other jurisdictions' strategies and progress impact the ACT's ability to deliver emissions reductions?	7. ADAPTATION AND MITIGATION Does the document include adaptation and mitigation actions that are directly linked to targets?
1 Actions using all available 3 powers to end the use and support for fossil fuels.	1. Does the ACT Government have an appropriate vision and direction setting on climate change that considers the broader climate action agenda?	8. DECARBONISATION Does the document provide evidence of action/s to end use of fossil fuels?
1 Implementation planning 4 for priority short-term actions.	2. Are the existing strategic plans deemed appropriate and effective to meet the government vision on climate change? 4. The findings from the latest emissions projections modelling suggests that there may be challenges for the ACT to meet interim and net zero targets under the existing policy settings. What are the strategic gaps and opportunities to help achieve our interim and net zero targets, and climate resilience objectives? 6a. Are the programs, policies, services, budget and resource allocations considered appropriate and effective in meeting the government vision on climate change? 6b. Are there specific gaps and opportunities at the operational level that will help achieve our interim and net zero targets, and climate resilience objectives?	9. INVESTMENT Does the document provide evidence of planning and / or resource allocation (investment) to meet targets?

C4o Framework criteria	Evaluation question from RFQ	Criteria
1 A system for monitoring, evaluation, reporting and learning (MERL) which includes a set of indicators to assess action implementation and progress at output, outcome and impact level.	6. A meta-analysis that synthesizes all existing evaluation, monitoring, review and research reports applicable to climate action in the ACT over the previous five years. 8. Are monitoring, evaluation, reporting and improvement processes in place and appropriate? What are the risks, gaps and opportunities in evaluation and reporting? For example, are there policies or programs that have not been evaluated or may need to be reevaluated to realign with the government's strategic direction?	10. MERL Does the document provide evidence of a system for monitoring, evaluation, reporting and learning (MERL)?
1 Regular public communication and reporting of the status of climate action implementation and progress towards the city's climate goals and targets based on the MERL system.	8. Are monitoring, evaluation, reporting and improvement processes in place and appropriate? What are the risks, gaps and opportunities in evaluation and reporting? For example, are there policies or programs that have not been evaluated or may need to be reevaluated to realign with the government's strategic direction?	Cataloguing question is N/A – stakeholder engagement will be used

Appendix B: Criteria for cataloguing documents and example document

Criteria	Details	Sub-Criteria	Example document
Document Details	Name of document	Description	ACT Climate Change Strategy 2019-25
Document #	Each document assessed will be given a unique number to allow analysis.	Number	4
Year	Year published	Year	2019
Length of document	No. pages	Number	40
Type of document	Report, strategy, plan, legislation, framework, implementation plan etc.	Description	Strategy
Description	One sentence description	Description	Outlines ACT Government's climate change response and identifies actions to meet the climate targets and prepare for climate change
Origin	Whether the document contains information on why climate response was created	Select one - Detailed/Some/None	Detailed
Tier	Each document will be assessed according to its overall importance. A proposed taxonomy is whether a document is a 'core' climate action document or a 'related' climate action document.	Core/Related <i>Draft guidance: A core climate action document would be a climate strategy, while a related document might be the disability strategy.</i>	Core
Notes	Any general notes		N/A
1: Governance	Does the document provide evidence of governance processes?	ACT Govt department that reviewed and approved document (brief description)	Director-General, Environment, Planning and Sustainable Development Directorate

Criteria	Details	Sub-Criteria	Example document
2: Stakeholder engagement	Does the document provide evidence of a stakeholder engagement process?	Which group was engaged (brief description)	Broad community engagement
		Engagement approach (brief description)	Extensive engagement process. More than 65,000 people reached by social media and engagement events. Almost 60 individual engagement events, 1100 face-to-face conversations with individuals and 100 emailed submissions. On the YourSay website, there were 3000 visits, 900 people voted in quick polls and 116 people submitted written comment.
3: Evidence	Does the document provide evidence that forms the basis for an action?	Evidence (Yes/No) <i>Draft guidance: including scientific evidence, assessment of existing conditions including baseline emissions, regular greenhouse gas inventories, a long-term emissions trajectory, accountability measures, climate risks and socioeconomic priorities</i>	Yes – e.g. references the Paris Agreement, outlines carbon budgets
	Does the document provide evidence of a vision and commitment to act on climate change?	Vision (Yes/No)	Yes
	Does the document provide evidence of adaptation strategies to boost climate resilience and reduce vulnerability?	Adaptation Strategies (Yes/No)	Yes
	Does the document provide evidence of mitigation strategies that expand beyond ACT?	Mitigation strategies (Yes/No)	Yes
	Does the document provide evidence of economic data?	Economic data (Yes/No) <i>Such as: a business plan, cost-benefit-analysis, cost and feasibility studies, etc.</i>	Yes – a number of cost and feasibility studies mention, social cost of carbon

Criteria	Details	Sub-Criteria	Example document
4: Targets	Does the document have short, medium and long term reporting targets?	Short term targets (Yes/No)	Yes – emissions reduction targets for 2020, 2025
		Medium term targets (Yes/No)	Yes – emissions reduction targets for 2030
		Long term targets (Yes/No)	Yes – emissions reduction targets for 2040, 2045
5: Wellbeing Framework	Does the document link to the ACT Wellbeing Framework? <i>We are proposing to use the ACT Wellbeing Framework as an indicator of an approach that incorporates just transition principles.</i>	Link to First Nations communities (Yes/No)	Yes
5: Wellbeing Framework	Does the document link to the ACT Wellbeing Framework? <i>We are proposing to use the ACT Wellbeing Framework as an indicator of an approach that incorporates just transition principles.</i>	Link to ACT Wellbeing Framework, select which apply: 1. Access and connectivity 2. Economy 3. Education and life-long learning 4. Environment and climate 5. Governance and institutions 6. Health 7. Housing and home 8. Identity and belonging 9. Living standards 10. Safety 11. Social connection 12. Time	Access and Connectivity Economy Education and life-long learning Environment and climate Governance and Institutions Health Housing and home Living standards Safety
6: Sector focus	Does the document focus on an individual sector?	Global Protocol for Community-Scale Greenhouse Gas Inventories (roughly), select which apply: 1. Energy 2. Transportation	Energy Transport Waste Agriculture, forestry + other land use

Criteria	Details	Sub-Criteria	Example document
		3. Waste 4. Industrial 5. Agriculture, forestry + other land use	
7: Adaptation and mitigation	Does the document include adaptation and mitigation actions that are directly linked to targets?	Adaptation actions (brief description) <i>Note: action must be tied to a target</i>	Yes – target for 30% tree canopy, targets for renters and social housing for climate-wise zero emissions homes
		Mitigation actions (brief description) <i>Note: action must be tied to a target</i>	Yes – various actions tied to targets across energy, transport, building
8: Decarbonisation	Does the document provide evidence of action/s to end use of fossil fuels?	Actions (brief description)	Yes – zero emissions from gas use by 2045, electrification of government fleet, 100% renewable electricity
9: Investment	Does the document provide evidence of planning and / or resource allocation (investment) to meet targets? <i>This question seeks to identify allocation of financial resources.</i>	Planning (Yes/No) Investment (Yes/No)	Yes Yes
10: MERL	Does the document provide evidence of monitoring, evaluation, reporting and learning (MERL) practices?	Monitoring (Yes/No) Evaluation (Yes/No) Reporting (Yes/No) Learning (Yes/No)	Yes Yes Yes Yes - Review in 2024 to assessment progress and inform to next strategy
11. EXTERNAL FACTORS	Does the document reference external factors such as other states/jurisdictions impacting on ACT Government actions?	Yes/No	Yes – collaborating with other jurisdictions e.g. on car registration reform

Appendix C: Full list of documents reviewed

1. Climate Change and Greenhouse Gas Reduction Act 2010
2. ACT Wellbeing Framework
3. Parliamentary and Governing Agreement
4. ACT Climate Change Strategy 2019-25
5. ACT's Zero Emissions Vehicles Strategy 2022-30
6. Zero-emission transition Plan for Transport Canberra
7. Building Canberra's Circular Economy: ACT Circular Economy Strategy and Action Plan 2023-2030
8. Active Travel Plan 2024-30
9. Canberra: A statement of ambition
10. CBR Switched On – ACT's Economic Development Priorities 2022-25
11. Whole of Government Adaptation Framework (INTERNAL)
12. Canberra's Living Infrastructure Plan: Cooling the City
13. Territory Wide Risk Assessment 2017
14. Climate Change Risk Assessment for the ACT
15. ACT Housing Strategy October 2018
16. Age Friendly City Plan 2020-2024
17. ACT Disability Strategy 2024-2033
18. Canberra Region Local Food Strategy 2024-29
19. Integrated Energy Plan
20. Parliamentary and Governing Agreement Status Report - Number Two 2022
21. ACT Climate change Strategy 2019 -2025 Review
22. 2022-23 Ministers Annual Report under the Climate Change and Greenhouse Gas Reduction Act 2010
23. Review of the Climate Change and Greenhouse Gas Reduction Act 2010 (ACT) 10-year statutory review
24. Carbon Neutral ACT Government Framework Review Internal paper 2017
25. ACT Greenhouse Gas Inventory report 2022-23
26. ACT Government Zero Emissions Vehicles Strategies Evaluation Report
27. Hydrogen Refuelling Station Review Final Audit report
28. Results of Consultation on an Energy Efficiency Improvement Scheme Extension
29. EEIS Policy settings analysis
30. Policy and Market Analysis for the EEIS
31. Monitoring and evaluation plan for the Home Energy Efficiency Program
32. Evaluation of the National Residential Efficiency Scorecard trial
33. Evaluation of home energy assessments
34. Map and gap analysis of support provided to vulnerable households to reduce carbon emissions and energy hardship
35. Sustainable Household Scheme Review
36. Actsmart PR_Business final
37. Actsmart PR_Community_Draft
38. Actsmart PR_Households_final
39. Review of the Electricity Feed-in (Renewable Energy Premium) Act 2008
40. Review of the Electricity Feed-in (Renewable Energy Premium) Act 2008
41. Review of the operation of the Electricity Feed-in (Large-scale Renewable Energy Generation) Act 2011
42. ACT Auditor-General's Report - Act Government's Vehicle Emissions Reduction Activities
43. Establishing Reporting from Regulatory Data Sets for Gas Transition and Electrification program
44. Home Energy Support: Community Housing Evaluation Report
45. VHESS how it all fits together
46. Climate Change Adaptation Strategy Completion Report
47. Review of Renewables Auction 5 Summary Report
48. Review of the Energy Efficiency Improvement Scheme
49. Canberra Plant Selector Tool (content review)
50. Monitoring and evaluation of the Minimum energy efficiency standard for rental properties in the ACT
51. GHG inventory review Canberra Memorial Parks
52. Sustainability Strategy 2021-2025 (Suburban Land Agency)
53. Zero Emissions Pathway Advisory - Canberra Health Services