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Tuesday 24 May 2022

SUBMISSION: Victoria's emissions reduction target for 2035

Dear Independent Expert Panel,

Friends of the Earth (FoE) Melbourne welcomes the opportunity to provide a submission to the Independent Expert Panel advising the state government on Victoria's 2035 Emissions Reduction Target.

FoE Melbourne is a not-for-profit organisation that has existed for nearly 50 years in Australia, and is part of FoE International—the world's biggest grassroots environmental network. Our work embodies the belief that social and environmental issues cannot be separated from each other. With this philosophy, FoE campaigns for climate solutions that have both social and environmental justice at their core. We seek to work toward a sustainable and equitable future, and to operate in a way that empowers communities.

The societal and economic transformation required to tackle the climate crisis should also be used as an opportunity to involve citizens more deeply in democratic processes and planning for the future.

Involved, engaged, diverse communities are inherently good, but also more resilient. Fostering these qualities will result in more empowered communities which are better able to weather the challenges that the climate crisis will continue to bring

BACKGROUND:

FoE Melbourne has been building the case for science-based emissions reduction targets in Victoria since 2017 through the Act on Climate collective. Our goal has been to make Victoria the national leader on climate which can deliver emissions cuts while the federal Coalition government stalled strong climate action for nine years.

In early 2017, the Act on Climate collective mobilised community members and allies to lobby key state upper house MPs in order to secure the votes needed for the strengthened Victorian *Climate Change Act 2017* to pass. From there, the collective ran a marathon four-year campaign for Victoria's 2025 and 2030 Emissions Reduction Targets to be bold, ambitious, and based on the best available science. The campaign involved communities from across the state who are on the first frontlines of climate change impacts and work in sectors that benefit from decarbonising our economy.

As part of the campaign, from June 2020 to April 2021, Act on Climate coordinated a project to create a <u>People's Climate Strategy for Victoria</u>. The finished Strategy was released just before the Victorian government's own <u>Climate Change Strategy</u>. The project was based on gathering local

knowledge from communities about the climate impacts people are worried about in their region, and the solutions they want to see funded and rolled out by the state government. The resulting *People's Climate Strategy* demonstrated a high level of citizen engagement from a passionate and diverse cross-section of Victorian communities.

In May 2021, after multiple delays, the Andrews government announced that it would set state Emissions Reduction Targets of 28-33% by 2025 and 45-50% by 2030.

FoE was advocating for a world-leading cut of 75% by 2030—a target that scientists say is necessary to achieve the Paris Agreement goal of limiting global warming to 1.5°C—and ended up with a commitment to halve Victoria's emissions over the next decade.

While the 2030 target adopted by the Andrews government was not what we were calling for, it was a significant outcome for national climate policy and politics under a federal Coalition government that abandoned all responsibility when it came to tackling the climate crisis.

FoE believes that the Victorian government now has the momentum to increase its ambition and set a bold Emissions Reduction Target for 2035 which is based on science.



RESPONSE TO CRITERIA:

FoE has based this response on the criteria set out for the independent expert panel in recommending interim Emissions Reduction Targets from the Victorian *Climate Change Act 2017*.

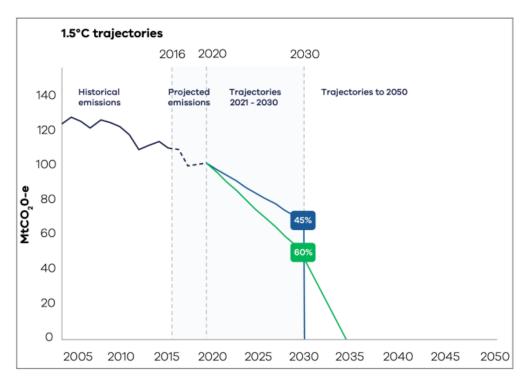
The Act states that the advice obtained by the independent panel must include the following:

(a) One or more recommended interim targets for reducing greenhouse gas emissions during the interim target period;

The Victorian government appointed former Federal Minister for Climate Change Greg Combet to undertake independent analysis of climate science and make recommendations on the 2025 and 2030 interim Emissions Reduction Targets.

The 'Combet Report' noted that cuts of 43% below 2005 levels by 2025 and 67% by 2030 would be needed to limit global warming to 1.5°C. It noted that a target of 45% emissions reduction by 2030 would exhaust the state's carbon budget this decade (see graph below¹).

It also recommended the government review and ratchet up the 2030 target in 2023.



GRAPH 2: The Combet Review's 1.5°C trajectories

Friends of the Earth recommendations:

- That the panel recommends a science-based and 1.5°C-compliant target of net-zero emissions by 2035.
- That the panel acts on the previous advisory panel's advice to review and ratchet up the 2030 Emissions Reduction Target. The state government has committed to reduce emissions by 45-50% by 2030 but deeper cuts are needed. The panel has an opportunity to provide an evidenced based recommendation to the government regarding an increased 2030 target.

(b) Indicative trajectories for the State to achieve the long-term emissions reduction target based on each option recommended;

FoE analysis undertaken in 2022 (verified by the Climate Council - see graph below) shows that if Victoria maintains its current 'business as usual' rate of decarbonisation, the state is on a trajectory to deliver an emissions reduction of 82% (on 2005 levels) by 2035.

¹https://www.climatechange.vic.gov.au/__data/assets/pdf_file/0016/420370/Final-Report_Interim-Emissions-Reduction-Targets.pdf

While this trajectory puts the state on track to achieve the legislated target of net-zero emissions by 2050 ten years ahead of schedule, it would see a 1.5°C-compliant carbon budget exhausted by 2034.

FoE analysis (see graph below) shows if the government wanted to extend the 1.5°C carbon budget out to 2050, it would have had to set a target of 78% by 2030. As the government decided on a target of 45-50% by 2030, the 2035 target will have to be incredibly deep to allow for a tail out to 2050.

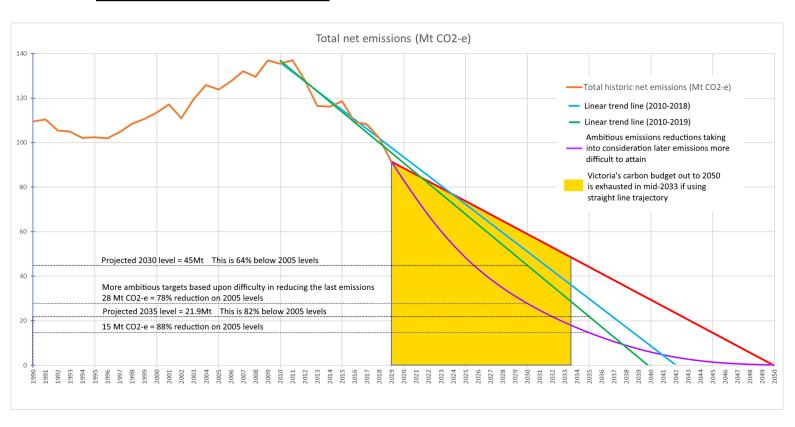
The analysis of the Victorian government's greenhouse gas reduction performance underscores the importance of early cuts as they have a dramatic impact on emissions reductions over the longer term.

Friends of the Earth recommendations:

- That the panel should undertake research into the following trajectories:
 - a) An extrapolation based on the current rate of decarbonisation starting from the year that emissions peaked in Victoria.
 - b) A trajectory based on a 1.5°C-compliant target from the most recent year of available greenhouse gas data to the point of the 1.5°C carbon budget's exhaustion.
 - c) A trajectory based on a 1.5°C-compliant target that demonstrates how the carbon budget could be extended out to 2050.
 - d) Trajectory c) based on a hypothetical 2030 target of 75% emissions reduction.

(c) Potential opportunities across the Victorian economy as a whole for reducing greenhouse gas emissions in the most efficient and cost-effective manner in the interim target period;

Friends of the Earth recommendations:



- Early Phase-Out of Coal: The Australian Energy Market Operator's (AEMO) 'step change' scenario expects all brown coal power generation in Australia to cease by 2032, as the ageing coal-fired power plants become more costly to maintain and harder to compete with renewable energy. The state government should take the emissions reductions of AEMO's 'step change' scenario into account when formulating its 2035 target. Ongoing funding of the Latrobe Valley Authority will be crucial for communities to plan ahead and emerge strong and resilient from the energy sector's transition away from coal.
- Fast Track the Phase Out of Native Forest Logging: The state government has taken an important first step in protecting Victoria's native forests—a vital carbon sink—by creating a transition plan to end native forest logging by 2030. Fast tracking the phase out of native forest logging would deliver significant emissions reductions in the Land Use, Land-Use Change, and Forestry (LULUCF) sector and save the state tens of millions of dollars a year. In 2020, the Parliamentary Budget Office found that native forest logging costs the state around \$19 million annually..²
- Public Transport: The government can tackle Victoria's growing transport emissions by
 facilitating modal shifting from primary reliance on cars to public transport; shifting freight to
 rail; and ensuring that all private vehicles are electric. The government should take the
 accelerating pace of the electric vehicles rollout and improved Public Transport
 infrastructure (and services) into account when setting Victoria's 2035 Emissions Reduction
 Target.
- Gas: The government's Gas Substitution Roadmap will outline measures to reduce the
 dependence of Victorian homes, businesses, and industry on polluting and expensive fossil
 gas. The state government can expect emissions reductions from the phase out of gas
 between now and 2035 and can factor these into the next interim Emissions Reduction
 Target.

The Climate Change Act 2017 stipulates that 'In forming the advice, an independent expert must consider the following—

(a) The long-term emissions reduction target;

For this section we refer the panel back to article (b) above, where we have outlined the emissions reduction trajectories for the panel to consider. The main takeaway we emphasise from the trajectories graph above is that setting a science-based target means bending the 'straight line trajectory' downwards to ensure the heavy-lift is done well before 2050.

FoE also directs the panel to two Guiding Principles on Equity from the *Climate Change Act 2017* when considering long-term emissions reduction:

- That 'opportunities should be created by the present generation to increase the capacities within that generation and future generations to adapt to climate change'.
- That 'in particular, the present generation should consider the opportunities to increase the capacities to adapt to climate change of those people most vulnerable to the potential

²https://www.theguardian.com/environment/2020/apr/13/ending-logging-in-victoria-now-would-save-taxpayers-192m-budget-office-estimates

impacts of climate change'.

Regarding these two points, FoE recommends that the panel consider the importance of intergenerational equity in recommending targets. For future generations to avoid the worst impacts of the climate crisis, present governments must set and implement science-based targets in the rapidly-closing window of opportunity to limit global warming to 1.5°C.

FoE would like to note the growth over the past five years of youth activist movements such as School Strike for Climate, which have mobilised over 150,000 Victorians on the streets to call for stronger action on climate from governments.

(b) Relevant up-to-date climate science, including any climate science report;

Over the last twelve months, the IPCC and International Energy Agency (IEA) have released updated analysis which shows that urgent accelerations in emissions reductions are now needed.

The IPCC's Sixth Assessment Report,³ released between August 2021 and April 2022, argues global emissions must peak by 2025 and nearly halve by 2030 if global warming is to be limited to 1.5°C.⁴

The IEA's 2021 report on decarbonising the energy sector⁵ makes the case that for the world to meet the 1.5°C challenge, 'there can be no new investments in oil, gas and coal, from now − from this year.'

In 2021, research by the Climate Targets Panel—a group of eminent climate scientists—showed emissions must be eliminated by 2035 for Australia to deliver a Paris-compliant target for 1.5°C. This analysis applies equally to Victoria.⁶

The case for accelerated emissions reduction is strengthened by the evidence that climate impacts are already hitting communities and ecosystems to levels worse than scientists predicted.⁷



³ https://www.ipcc.ch/assessment-report/ar6/

⁴ https://www.theguardian.com/environment/2022/apr/04/ipcc-report-now-or-never-if-world-stave-off-climate-disaster

⁵ https://www.iea.org/reports/net-zero-by-2050

⁶ https://www.climatecollege.unimelb.edu.au/australias-paris-agreement-pathways

https://www.nature.com/articles/d41586-022-00585-7

(c) Any technology relevant to climate change;

An ongoing challenge for Victoria will be keeping up with the pace of new clean technologies and deploying them in local industries and communities. Victoria is competing on the global stage for investment in zero-carbon technology and industries. A science-based 2035 target will help Victoria secure investment to roll out new technology and ramp up clean tech manufacturing.

Friends of the Earth recommend particular consideration of the following technologies for their potential to deliver deep emissions cuts through government rollout:

- Emerging offshore wind technology
- Renewable energy storage technology
- Electric buses
- Heat pumps, induction and other electrical appliances that can help households and businesses get off fossil gas.
- Microgrids and upgrades to the distribution network.

(d) Economic circumstances, in particular the likely impact of the target on the economy and the competitiveness of particular sectors of the economy;

Victoria's economy has much to gain from setting an ambitious, science-based target for 2035. An ambitious target can set Victoria up to be competitive on the national and global stage when it comes to securing investment, developing new industries, and rolling out new technologies and services.

Friends of the Earth would like to highlight the following opportunities that pursuing a science-based target would present for Victoria's economic success:

- Energy Transition: As mentioned above, AEMO's 'step change' scenario forecasts that brown coal generation will cease by 2032. A science-based Emissions Reduction Target can add certainty to support investment in new renewable energy generation and storage.
- *Green Manufacturing:* Cheap and abundant renewable energy would make Victoria an attractive place for manufacturing. Regional manufacturing centres such as Portland would benefit from resultant ongoing local jobs.
- Logging: As mentioned above, Victoria's native forest logging industry is a drain on the state budget, losing the taxpayers approximately \$19 million each year.
- Transport: Electric vehicles (EVs) outcompete internal combustion engine (ICE) vehicles on their running costs. The costs of ICE vehicles and their associated infrastructure will increase, and ICE cars will become stranded assets, as EVs enter the fleet en masse this decade.
- Costs of Inaction: Scientists warn that failure to make the deep emissions cuts needed before 2035 to limit global warming to 1.5°C will result in intensifying climate impacts and disasters. These impacts - such as coastal erosion, bushfires, crop failure, water scarcity, and extreme weather damage - will carry exponential costs for communities and governments. A heavy-lift on emissions reduction now will be the most cost-effective approach in the long

term, as the costs of future climate impacts and disasters will be minimised.

Job Creation: Pursuing deep emissions cuts will require the rollout of renewable energy, new
clean technology, and upgraded infrastructure and services - all of which will create excellent
local job opportunities. 2021 University of Melbourne modelling shows that the initiatives to
deliver emissions reductions consistent with a 1.5°C trajectory would create an estimated
53,900 jobs.8



FoE also directs the panel to the Guiding Principle on Compatibility from the *Climate Change Act 2017* when considering economic outcomes of targets:

• That the targets 'seek to promote a coherent policy framework within the State'.

Friends of the Earth recommendations

• Climate Impact Statement: When it comes to the climate crisis, an ounce of prevention is worth a pound of cure. The Victorian government needs an early intervention framework to ensure that it can account for the avoided costs that result from strong mitigation policies.

The government will need to modernise the budget process to align public spending with its obligations to the *Climate Change Act 2017*—the implementation of the state climate strategy and adaptation action plans.

In 2017, ratings agencies Standard & Poors and Moody's stated that banks, cities, and states that fail to account for climate risk could face credit rating downgrades. It is advantageous for governments to adopt climate-risk accounting measures to get out in front of the move. Failure to do so could see the government making contradictory decisions, such as allocating public funding towards forestry which undermines the state's greatest carbon sink.

⁸https://d3n8a8pro7vhmx.cloudfront.net/friendsofearthmelbourne/pages/1354/attachments/original/1613124824/Friends_of_the _Earth_-_Victoria's_Emissions_Reduction_Targets_-_Locking_in_Jobs_With_Science-Based_Targets.pdf?1613124824

FoE recommends that the government publishes a *Climate Impact Statement* when the budget is released, effectively modernising the budget to align with state climate policy. The statement would present:

- <u>Baseline and categorise climate-related expenditure</u>: There is a clear need for the
 government, key stakeholders, and public to understand how expenditure contributes
 towards direct mitigation, indirect mitigation, adaptation, and disaster response. This
 analysis can form a baseline and allow governments, departments, and stakeholders to track
 trends.
- <u>Carbon accounting</u>: Adopt carbon emissions valuation, such as the 'social cost of carbon' model used in the United States, to account for the greenhouse gas emissions liabilities of state government activities. This would be incorporated into cost-benefit analysis of government programs and investments.

(e) Social circumstances, in particular the likely impact of the target on the health and wellbeing of Victorians;

FoE sees action on climate change as inseparable from social justice, and we hold the value of climate justice central in our advocacy. Centering climate justice means that we do not confront climate change as merely a problem of physics requiring technological solutions. All climate solutions should have the goals of creating good, secure jobs, tackling disadvantage in communities, and advancing social justice.

A science-based 2035 Emissions Reduction Target will have a number of positive outcomes for the health and wellbeing of Victorian communities. FoE sees the following as important to consider:

- Economic Wellbeing: Communities that live in regions dependent on fossil fuels and
 extractive industries will require targeted support to ensure economic diversification and job
 creation. The Latrobe Valley Authority will develop the region's first Transition Plan to cope
 with coal closures and capture the economic opportunities of offshore wind, renewable
 energy development, and other zero-carbon/climate-friendly industries.
- *Public Health:* Eliminating emissions by 2035 will eliminate the pollutants from fossil fuel combustion and other polluting industries. This will deliver proven public health benefits.⁹
- Mental Health: The negative effects of climate change itself on mental health are already well-researched. Anxiety and distress about the climate crisis is particularly high among young people, and much of it stems from the failure of governments to match the scale of the problem with action.¹⁰ Climate impacts such as intensified heatwaves and bushfires are also already negatively impacting mental health in communities; studies have found that during heatwaves, mental health-related hospital admissions soar alongside physical effects.¹¹ A science-based 2035 Emissions Reduction Target matched with ambitious policies would give people hope and optimism about the monumental challenge of tackling climate change.
- No one left behind: Disadvantaged communities are already on the frontlines of climate change and will feel its impacts hardest in coming years. The living and working conditions in

⁹ https://www.healthyfutures.net.au/climate_change_health

 $^{^{10}\} https://the conversation.com/climate-change-is-harming-childrens-mental-health-and-this-is-just-the-start-168070$

¹¹ https://mashable.com/article/effects-of-heat-waves-on-humans-mental-health

low-income communities mean that climate impacts are felt more acutely and climate change is exacerbating existing inequalities.

Looking ahead, disadvantaged communities have the most to gain from deep emissions reduction targets as they are at the most risk of climate impacts.

Additionally, a science-based target will allow the state government to plan for ensuring that disadvantaged communities are supported to adopt new low-emissions technologies, rather than their rollout being left to market forces.

FoE directs the panel to the Climate Change Act's Guiding Principle on Risk Management:

• That policy should be based on 'managing and allocating the risks associated with the potential impacts of climate change in a manner that is easily seen and understood and endeavouring to achieve best practice.'

Friends of the Earth recommendations

With climate impacts already hitting communities, there is a role for the Victorian government to promote community climate literacy by connecting the dots between nascent local impacts and the global problem including future predictions.

• Public Education on Coastal Climate Impacts: The Victorian government can show leadership on this front by preparing a special report on climate impacts on the coast and embarking on a public education campaign. The first and last time sea-level rise impacts were investigated by the federal government, Kevin Rudd was the Prime Minister. The Victorian government can draw on the best-available science to alert the community about the amount of sea-level rise that will occur each decade out to 2100; identify vulnerable housing, infrastructure (such as sewage treatment facilities), and ecosystems; and outline steps to manage impacts and support communities on the frontline. The Victorian government can also show leadership by clearly articulating the climate dimension of public works to defend or upgrade infrastructure to cope with intensifying impacts (e.g. public information signs where groynes are constructed).

(f) Environmental circumstances, in particular the benefits to the environment of emissions reduction;

When it comes to tackling the climate crisis, an ounce of prevention is worth a pound of cure. For Victoria's unique and fragile ecosystems to remain intact, the deepest emissions cuts need to be made well before 2050 to avoid the worst impacts of climate change. A science-based target of net-zero by 2035 will ensure Victoria contributes to global efforts to avoid crossing the 1.5°C threshold, which will allow these ecosystems the best chance of staying functional and resilient.

FoE recommends the panel take into consideration the implications for the following in 1.5°C and 2°C of warming scenarios:

- Alpine Country: The survival of Victoria's Snow Gum forests of the High Country, which are already threatened by climate change-related threats of increased bushfire and dieback.
 These threats are detailed in FoE's 2021 report An Icon At Risk.¹²
- Seed transfer: Plans to revegetate degraded landscapes will need to consider the fact that many plant species will no longer be able to thrive in the geographic areas they are indigenous to in a warmer world.
- Coastal Erosion: Victoria's coastal communities such as Inverloch, Port Fairy, and Apollo Bay are feeling the effects of climate change through accelerating coastal erosion from rising sea levels and intensifying storm surges.¹³ Inverloch's main surf beach has lost over 50 metres of sand since 2012, and erosion at Apollo Bay threatens Victoria's iconic Great Ocean Road. We recommend the panel investigate what the 1.5°C and 2°C of warming scenarios mean for sea level rise along Victoria's coast.
- Water supply: Water scarcity will threaten a growing number of people as climate impacts
 affect the hydrological cycle and levels of rainfall. Victoria's native forests are vital for the
 supply of clean water to catchments across the state.¹⁴ The panel should investigate the
 contribution of Victorian forests to both drawing down emissions and maintaining water
 supply, and what the different warming scenarios will mean for these ecosystems.





¹²https://d3n8a8pro7vhmx.cloudfront.net/friendsofearthmelbourne/pages/4440/attachments/original/1627899478/AnlconAtRisk_softcopy_1up.pdf?1627899478

¹³https://www.smh.com.au/environment/climate-change/climate-damage-starting-to-hit-us-where-it-hurts-on-the-beach-2021090 8-p58ptn.html

¹⁴https://www.theguardian.com/environment/2018/may/01/melbournes-water-supply-at-risk-due-to-collapse-of-forests-caused-by-logging

(g) Existing national and global action on climate change, including any undertakings relating to the reduction of greenhouse gas emissions that Australia has given under international climate change agreements;

Coalition Government Failure on Climate

Australia developed an international reputation as a laggard when it comes to climate policy under Coalition federal governments of the last nine years.

At the 2021 COP26 Climate Conference, at which parties were expected to bring accelerated plans to cut emissions, the Morrison government failed to increase Australia's current national target of 26-28% emissions reduction (on 2005 levels) by 2030. That target was consistent with a catastrophic 3-4°C of warming.¹⁵

The Morrison government had, however, signed onto the *Glasgow Pact* which requires Australia to take an increased 2030 target to COP27 in Egypt in November 2022.

Update: 2022 Federal Election

The election of the Albanese Labor government in May 2022 signals a new step-up on climate action at the federal level. Australia's new national Emissions Reduction Target will be 43% by 2030. While this target is nearly double that of the Coalition government's, it is consistent with 2°C of warming, which is considered an unsafe level by the international community.¹⁶

The federal government's increased target creates momentum for the states and territories to ramp up the ambition of their interim targets. A new era of support in the form of policy and funding for climate action from the federal level will create backing for Victoria to set a science-based 2035 target.



¹⁵ https://climateactiontracker.org/countries/australia/

 $^{^{16} \ \}text{https://theconversation.com/the-teals-and-greens-will-turn-up-the-heat-on-labors-climate-policy-heres-what-to-expect-183532}$

States and Territories

All Australian states and territories now have targets of achieving net-zero emissions by 2050. However, Victoria and the Australian Capital Territory are the only two which have their targets legislated.

Under Victoria's legislated target, the Victorian government is required to set interim targets every five years to 2050, and accompany these targets with Climate Change Strategies and Adaptation Action Plans. This means that Victoria will be the first state in Australia to set a 2035 target.

The legislation setting out the processes to chart Victoria's path to achieving its targets set it up well to be bold and ambitious. Victoria has an opportunity to show national leadership and inspire other jurisdictions to support science-based targets needed to match the scale of the problem. Since Victoria represents 17.3% of Australia's total greenhouse gas emissions, ¹⁷ delivering deep cuts will have a strong national impact.

Global Action

There is acceptance among global leaders that the COP26 agreement was not enough to avert dangerous climate impacts.¹⁸

In the international arena, Victoria has stepped up to fill part of the gap left by the Morrison government when it comes to recognising Australia's global responsibility to act on climate change. This includes Victoria signing the *Climate Leadership Declaration* to limit global warming below 1.5°C.

Increased ambition from Victoria demonstrated by a science-based Emissions Reduction Target will lighten the load on other jurisdictions and build momentum for deeper cuts at the global level. It would put Victoria in line with jurisdictions that have committed to ambitious emissions cuts well before 2050 such as Finland (net-zero by 2035), , the United Kingdom (78% below 1990 levels by 2035), Scotland (75% below 1990 levels by 2030), Denmark (70% reduction by 2030), and Sweden (70% below 2010 levels by 2030).

Additionally, bold action from Victoria will signal that it is responding to the climate crisis with the urgency required to Australia's Pacific Island Nation neighbours. The island nations, many of which are threatened with inundation from sea level rise this century, have repeatedly condemned the Morrison government for its failure to set strong targets aligned with limiting warming to 1.5°C.¹⁹

(h) Any progress towards the reduction of greenhouse gas emissions, including any annual greenhouse gas emissions report;

The Victorian government should be commended for its performance on cutting the state's emissions since legislating the *Climate Change Act* in 2017. The Victorian government has implemented policies to drive down emissions across the economy, such as:

• A Victorian Renewable Energy Target

 $^{^{17}\} https://www.climateworkscentre.org/wp-content/uploads/2021/10/CWA_State-and-territory-climate-action_October-2021.pdf$

¹⁸ https://www.washingtonpost.com/climate-environment/2021/11/14/climate-deal-reaction-cop26-world/

¹⁹https://www.theguardian.com/world/2020/dec/01/pacific-leaders-condemn-australias-weak-climate-target-in-open-letter-to-scot t-morrison

- Legislating a permanent ban on fracking
- Victoria's first Gas Substitution Roadmap
- Solar Homes program
- A strengthened Victorian Energy Efficiency Target
- Phasing out native forest logging by 2030 (we note that the 2030 deadline will need to be brought forward to maximise biodiversity and climate outcomes).
- Incentives for householders to replace inefficient gas heating with electric heating
- The first Offshore Wind target in Australia which will see 9GW of offshore wind generation installed by 2040.²⁰



Victorian Emissions Reduction Performance

Victoria has achieved significant emissions reductions that have outperformed the state government's targets.

The latest greenhouse gas data shows Victoria's emissions have already fallen by almost 25% between 2005-2019.²¹ This means the Andrews government has met its target of cutting emissions by 20% by 2020 well ahead of schedule.

Victoria's performance demonstrates that with strong policies and public investment, the state can exceed its own targets even under a federal government that stalls action. The Victorian government has the momentum to aim well above 'business as usual' and align Victoria's 2035 target with climate science.

²⁰ https://reneweconomy.com.au/victoria-sets-game-changing-offshore-wind-target-of-9gw-to-replace-coal/

²¹https://www.theage.com.au/national/victoria/victorian-greenhouse-emissions-drop-25-per-cent-below-2005-levels-20211026-p 5934b.html

Additional recommendation: Community Consultation

FoE would like to make a recommendation based on the *Climate Change Act*'s Guiding Principle on Community Engagement:

• That the government engages in 'appropriate and adequate public consultation with the community.'

FoE commends the Department of Environment, Land, Water and Planning for extending the submission deadline of this consultation in response to requests from a variety of stakeholders. The extension will allow for a greater diversity of community members, organisations, unions, and others to have their say on how high Victoria should aim on climate and enrich the panel's understanding of the issue with their perspectives.

Based on feedback from several stakeholders, FoE notes that the timeline for making a submission and lack of publicising of the process will still be significant barriers to widespread community participation (including the capacity of environmental advocacy groups to publicise the process in the federal election lead-up and aftermath).

The previous expert panel visited the Latrobe Valley for fact finding and key stakeholder engagement. This panel has an opportunity to build on that knowledge base by visiting communities where cutting emissions is an economic opportunity as well as those on the frontline of climate impacts.

We encourage the panel to visit the following communities for insights:

Economic Opportunities:

- Hepburn Wind farm for an insight into community energy and Hepburn Shire's ZNET (Zero-Net Emissions) project-- a shire plan to achieve zero-net emissions by 2025.
- Keppel Prince Engineering in Portland, a major employer and beneficiary of growth in the renewable energy sector.
- Totally Renewable Yackandandah, a community group in a small rural town with a commitment to be powered entirely by renewables by 2022.
- Wind turbine company Vestas' Lyndhurst warehousing/training facility.
- Wilsons Transformers in Glen Waverley, Schneider Engineering in Benalla, and Olex Cables for a view of renewable energy supply chain and jobs.
- Star of the South in Melbourne and their regional office in Yarram.
- The Asia Pacific Renewable Energy Training Centre at Federation University in Ballarat.

Climate Frontlines:

- Bushfire Survivors for Climate, Australian Firefighters Climate Alliance, and Emergency Leaders for Climate Action.
- School Strike 4 Climate for a youth perspective.
- Coastal communities such as Inverloch, Port Fairy, and Apollo Bay where rising sea levels and intensifying storm surges are damaging infrastructure and ecosystems.
- Bush Heritage Australia, a not-for-profit conservation and land manager, which has observed climate impacts in north-central Victoria.

CONCLUSION:

We are facing a climate crisis. When it comes to tackling this issue, governments must acknowledge that an ounce of prevention is worth a pound of cure. All levels of government must act on the best available science and set out to eliminate greenhouse gas emissions as soon as possible.

FoE acknowledges the work of the panel and support from the Department of Environment, Land, Water, and Planning, and welcomes the opportunity to have input into the process. We believe the recommendations presented in this submission will strengthen the panel's advice to the government and our state's response to the climate crisis.

We commend the submissions to this process from community climate action groups and allies such as Environment Victoria and the Victorian Trades Hall Council. We also encourage engagement with the Traditional Custodians in the development of climate and environmental policy.

If this submission requires additional information or clarification, please contact Anna Langford, coordinator of FoE's Act on Climate campaign.

Yours respectfully,

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