



# Submission in Relation to City of Ballarat Draft Emissions Management Action Plan

November 2015

The Regional Sustainability Alliance Ballarat under a memorandum of understanding is required to undertake review and provide feedback to the City of Ballarat on relevant environmental policies and strategies. The content of this submission is the result of comments provided by RSAB representatives at meetings convened on 20<sup>th</sup> October and 3<sup>rd</sup> November 2015 to discuss the Draft Emissions Management Action Plan.

RSAB comments CoB in putting forward this draft plan for emissions reduction. RSAB members are drawn from diverse sectors that see opportunities in addition to challenges in a future carbon-constrained economy for Ballarat and the region. RSAB comments in general are focussed on identifying and utilising opportunities and building community reliance.

RSAB recommends that before Council reconsiders the Emissions Management Action Plan the following actions be implemented to ensure the action plan has ownership and capacity to change behaviour and environmental outcomes:

## **1. Adopt the Environment Sustainability Policy (2014).**

This document has been developed to mirror the directions and rationale of the Ballarat Strategy adopted earlier this year. Without a clear policy direction by the Council, the organisation will take a discretionary approach to the best practice essentials and there may be contradictory programs and behaviours across the organisation. The policy was presented to Council in April 2014 and it was resolved that a final version with suggested amendments received through stakeholder feedback be incorporated. The ES Policy needs to be finalised and endorsed by Council as soon as possible.

## **2. Re-name the Emissions Action Plan**

The rationale that applied at the time of its drafting appears to be that the words “Environmental” and “Sustainability” should be removed from its title, while the section entitled “Developing a Culture of Sustainability” is broader based than emissions reduction.

The action concerning community education and engagement plans is also unrelated to corporate emissions reduction. The original objective and actions under “Building Community Adaptive Capacity” (from the ES Policy) need to be incorporated into the appropriate sections of the Council Plan, and Business Unit Plans for community development.

Since the focus of the document is the organisation’s responses required to implement the ES Policy it would be prudent to name it something like City of Ballarat Organisational Sustainability Action Plan. It is clear the intent is to exclude actions that will be included in the other environmental action plans (e.g. Biodiversity, Water Management, Urban Forestry, and Active Transport).

### **3. Build Ownership for Actions**

The Environment Sustainability Policy and Emissions Action Plan, while developed from within the City Services Division, require a whole of organisation approach to their implementation. It is recommended that Council, Management and staff are provided the time and approval to explore the, constraints and opportunities that implementation will bring so that Business Unit plans integrate their content. The Ballarat Strategy is the enabler that provides the rationale for the organisation to explore and own the policy and action plan. Resources identified to assist in this approach include:

- DELWP - Kath Gosden (the DELWP Local Government Climate Change Mentor) who has experience working in regional local government. The Victorian Climate Change Grants 2015 for local government have just been announced. Information about how to apply is at [www.delwp.vic.gov.au/climate-change-grants](http://www.delwp.vic.gov.au/climate-change-grants)
- Central Victorian Greenhouse Alliance (CVGA) – Executive Officer Melanie Tranter has offered to assist in exploring Climate Change impacts. The climate change risk assessment, already completed in 2013, should be part of the background documents to any such discussion.
- Federation University – National Centre for Sustainability – Craig Hurley’s offer to assist in setting targets and measures for corporate sustainability reporting.
- Continued support, discussion and advice through RSAB

The current timing is appropriate to re-engage considering changes in policy emerging worldwide and within Australia relating to the need to take formal action in response to climate change.

To assist this process the 6 highest priority climate change risks identified in the 2013 City of Ballarat Climate Change Risk Assessment be reconsidered for inclusion in the Enterprise Risk Register.

### **4. Re-format Action Plan**

The action plan is recommended to be reformatted so as to be consistent with other Council strategies/action plans. It is recommended that the plan includes context, rationale, outcomes, actions, timeframes, resources and corporate responsibility for implementation and reporting.

## 5. Conclusion

RSAB is willing to assist Council in the formulation of the revised action plan in conjunction with the following recommended actions:

- a. taking up the various offers made by DELWP and CVGA to engage Council and Staff in productive discussions about the need to change business practices and decision making processes in order to deliver the vision shown in the Ballarat Strategy
- b. Finalising and adopting the Environment Sustainability Policy 2014.