

# Draft Climate Change Policy – Net Zero Emissions by 2030

## Submitters requested changes and Council's response

Submission comment	Council response
Scope	
Clarify scope of emissions that the policy applies to ie not the mining and processing of the raw materials, manufacture and the safe disposal of used equipment.	Agreed. New section added to refer to the different categories of greenhouse gas emissions (direct and indirect) and information about finding annual details on Council's website.  Inclusion of current emissions data in the policy is not recommended as this data changes year to year.
Title	
Change the title to Climate Change Management Policy	Agreed. Policy is about more than just the emissions target referred to in the draft policy title.
Structure	
Structure is confusing.	Agreed. Climate change impacts for Tweed Shire have been relocated after the Context section of the policy document
Purpose	
Reword: <i>guide Council's direction for managing and reducing the impacts from climate change into the future'</i>	Maintain the intent of the existing Purpose statement.  Policy seeks to gain endorsement for Council's emissions reduction actions as well as action to manage and reduce the impacts of climate change now and into the future.
Reorder for readability: This Policy aims to communicate Council's targets, objectives and priorities in addressing climate change	Agreed. Change sentence as suggested:  This Policy aims to communicate Council's <b>principles, objectives,</b> targets, <del>objectives</del> and priorities in addressing climate change, and establishes a framework to build resilience within the organisation, the community and landscape.
The policy purpose should declare the Council intent to manage the impacts of climate change over the many decades of climate change by "aiming to communicate Council's targets, objectives and priorities in addressing climate change, etc." This will not end by 2030.	Policy will be reviewed after each local government election, so the timeframe for the intent of the policy will stay current depending on the outcome of its regular review.
Context	
Link this policy in an appropriate hierarchial fashion to the existing Council policy framework. Are there any dependencies?	Agreed. References have been added to acknowledge the range of climate change-related topics that Council has numerous policies, strategies and programs. Details are not provided as programs and policy references change frequently.
What gap does this policy fill?	This policy formalises Council's commitment to emissions reduction and climate change adaptation principles and priorities.
The Community Strategic Plan needs to be updated to provide increased emphasis on Council intentions to address the future climate change impacts that will occur to this community.	The revision of the Tweed Community Strategic Plan after local government elections is based on community input and reflect the community's vision and input on how to get there.
Guiding Principles	
The first and third-last dot points are not principles but statements.	No change recommended.  The principle statements referred to contribute to the underlying foundation on which Council responds to climate change, namely: <ul style="list-style-type: none"> <li>- legislative and community expectations</li> <li>- Tweed's internationally significant biodiversity warrants special attention in responding to climate change</li> <li>- Partnering with others will be vital</li> <li>- Council's response to climate change will aim to be effective, progressive, based on trusted information sources and technologies. Responding strategically to risk and monitoring the impact of our actions will form the basis of Council's approach.</li> </ul>
Guiding principle 8: Partnering	
This Partnering Strategy will be so important moving forward that it should be identified as a key strategy within this Policy document and should provide a detailed Community Engagement Strategy.	Reference added to Key Priority 4 to invite input from all stakeholder groups needed to achieve Tweed's Climate Change Action Plan.
Council needs to monitor, evaluate and report on the progressive implementation of the climate change action plan, identifying before and after measured results and form the basis of technical information provided as part of the Community Engagement Strategy.	Agreed.  A measurement, monitoring, evaluation and reporting plan will need to be prepared as part of the Climate Change Action Plan.
Objectives	

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Objectives must be measurable	Reframe as 'Goals' rather than objectives or rewrite objectives to be measurable: <ul style="list-style-type: none"> <li>- Reduce Council's operational greenhouse gas emissions and purchase or create carbon credits to offset Council's remaining carbon footprint to achieve net-zero emissions by 2030</li> <li>- Complete a climate risk assessment and adaptation plan by 2021</li> </ul>
Target: Council operations net-zero by 2030	
Time frame should be longer. We should know what alternatives will be used before we commit.	Council officers will prepare more detailed analyses of Council's corporate and community emissions reduction actions, costs and funding options, and timeframes for implementing them.
Target should be aligned with the NSW government date of 2050.	The NSW Net Zero Plan Stage 1: 2020 – 2030 sets a target to reduce NSW emissions by 35% by 2030 and to net-zero by 2050. The review of Tweed's community emissions will consider the merits of aligning with the NSW target of 35% by 2030 or the IPCC target which would translate to a 66% reduction in greenhouse gas emissions across the Tweed community by 2030.
Reword 'Wherever possible Council will aim to reach net zero emissions earlier than 2030 and will not use the 2030 deadline as an excuse to delay potential energy saving initiatives for its own operations or those of the community.'	Council will prepare more detailed analyses of Council's corporate and community emissions reduction actions, costs and funding options, and timeframes for implementing them.  In the meantime, Council will continue its active energy saving initiatives for its own operations (Renewable Energy Action Plan) and for the community (Smart Housing Design fact sheets, promoting energy efficiency programs for businesses, running energy efficiency workshops for residents, promoting Council's Solar Buyers Guide).
Priorities 1 & 12: Council and community waste	
Distinguish between principles to manage Council's waste distinct from resource recovery in the community	Reword Priority 12 to:  12. Reduce <b>community</b> waste to landfill by <b>supporting beneficial waste avoidance, resource reuse, reduced consumption less,</b> and by processing and diverting material for recovery and reuse.
New industry, while welcomed, should be part of a circular economy ensuring responsibility for its own waste.	Noted.
Priorities 4 & 5: Climate Change Action Plan for Council and the Community	
The generation and storage of the renewable energy (including the mining, transport and production of generators and storage capacity) must demonstrate a net reduction in carbon footprint.  Make sure that if we are using renewable energy that is not actually having a bigger, worse impact than the traditional or legacy energy generation and storage practices. In other words, happy for renewable energy, as long as it decreases the carbon footprint.	Include analysis in the next update to Council about future Renewable Energy Action Plan targets.
It would be an amazing move by Tweed Council to replicate Sunshine Coast Council, who in 2017 became Australia's first local government to offset its entire electricity consumption across all its facilities and operations from renewable energy generated at the 15MW Sunshine Coast Solar Farm.	A renewable energy study, which formed the basis of Council's Renewable Energy Action Plan, found that a lack of appropriate land and electrical infrastructure limit the feasibility of a large solar farm within the Tweed Shire.
Priority 7: Utilise the land-use planning and development assessment system to identify options for mitigation of climate change, and adaptation to hazards such as heat and tidal inundation.	
Further development of the Tweed [should ensure] is that housing and industry be carbon neutral. New housing estates and industry should have extensive utilization of solar energy and storage and recycling of grey water.	Noted.
It would be sensible for Council to adapt a 'Land Use Conflict' assessment tool with all planning matters to flag environmental and climate change risks and impacts.	Noted.
Priority 11: Support and advocate for systems that enhance health as a state of physical, mental and social wellbeing, as well as limiting exposure to diseases and environmental hazards (contaminated water, viruses, heat, chemicals and dust).	
Should include radiation	Climate change related impacts and links to radiation will be investigated as part of the Climate Change risk review.
Priority 13: Address the impacts of climate change in biodiversity conservation by increasing native vegetation cover and wildlife habitat connectivity, and improving ecosystem health across the Tweed Shire	
Will rural landowners be compensated for carrying the cost of more vegetation planting for a wider community benefit? Until these details are made clear we cannot support the draft strategy in its present form.	A range of assistance and incentive programs are available through various government and non-government programs and schemes.
I consider that wording needs to be added in dot point 4 on page 8 of the draft policy by inserting after "...habitat connectivity" the words:- "This will include incentives funded by Council for all rate payers/land holders to increase the number and variety of native trees, shrubs and other plants on their property in order to	Cost-effective opportunities to increase carbon sequestration in the Tweed Shire will be evaluated when we develop options to significantly reduce Tweed's community greenhouse gas emissions.

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increase carbon sequestration in the flora in Tweed Shire".	
In the Climate Change Action Plan that is proposed I would like to see this aspect given highest priority and significant new financial allocation to achieve this goal.	Noted. All opportunities will be evaluated.
Legislation	
<ul style="list-style-type: none"> <li>• expand what is included under Key Legislation to ensure that all planning matters in particular are included. Environmental damage and climate change related impacts are invariably caused by planning and development matters.</li> <li>• it should also include the following State Environmental Planning Policies (SEPPs): <ul style="list-style-type: none"> <li>○ Infrastructure 2007</li> <li>○ Rural Land 2008</li> <li>○ No 30 – Intensive Agriculture</li> <li>○ No 33 – Hazardous and Offensive Development</li> <li>○ No 55 -Remediation of Land</li> <li>○ Any other SEPPs or Codes of Practice or policies which may apply to not only causes and contributors to climate change, but activities which will risk or impact the environment including natural resources, people and all non-human animals including biodiversity.</li> </ul> </li> </ul>	No change needed. The Environmental Planning & Assessment Act governs the State Environmental Planning Policies mentioned in the submission.
Costing	
The policy MUST be costed.	<p>Analysing and costing options to meet net zero emissions from Council's operations by 2030 is further work that is proposed when options are assessed to meet net zero emissions from Council's operations by 2030.</p> <p>In May 2018, advice was provided to Council that carbon offset costs can range from \$40/tonne for Australian Greenpower, \$14/tonne for Tasmanian forestry carbon credits, to \$1.40/tonne for Chinese windfarm credits. Organisations often purchase a range of offset products to spread the benefit of their investment across a range of markets. For Council, purchasing offsets could result in an annual carbon offset cost from anywhere between \$35,000 to \$1,000,000, depending on the mix of offset products purchased.</p> <p>In addition, audit and licence fees of approximately \$27,000 per year would bring Council in line with the Australian Climate Active offset standard :</p> <ul style="list-style-type: none"> <li>• Improved carbon footprint calculation (and ongoing annual audit): \$8,200 ex GST</li> <li>• Annual Climate Active submission: \$2,800 ex GST</li> <li>• Climate Active annual licence fee: \$16,600 ex GST</li> </ul> <p>Note: Council's Renewable Energy Action Plan (REAP) will reduce Council's carbon footprint from 24,000 tonnes greenhouse gas emissions per year to 5,500 tonnes per year. REAP's Phase 1 projects repay the capital investment within 5 years, on average, and deliver another 20 years of energy savings, in the case of the expected lifetime of solar assets. Compared to purchasing carbon offsets, REAP projects provide a better return on investment as they both reduce Council's energy costs and carbon emissions.</p>
If policy can't be costed, policy should be simply: TSC COMMITS TO LOOKING AT GREEN ALTERNATIVES PROJECT BY PROJECT. EACH ALTERNATIVE BOTH GREEN AND CONVENTIONAL) MUST HAVE THE ALTERNATIVE COSTING PROVIDED AND THE COST SCENARIO DEBATED AND ADVISED TO THE RESIDENTS.	<p>Agreed. Guiding Principle 2 has been changed.</p> <p>Principle 7 also highlights Council's approach to sharing information with the community including</p> <p>(iii) reporting on investment, trade-offs, actions and outcomes in efforts to mitigate and adapt to climate change.</p>
All major green investment must be advised and debated by residents.	Council's draft budget is made available for public input. Specific spending proposals are presented to Council via the public agenda, which is available for residents to have their say.
The alternative use for the funds must also be discussed as the role of local Council is surely to fund basic resident needs in the most cost effective way, rather than following any ideology?	<p>Council and the community consider alternative use of funds during the draft budget exhibition and review.</p> <p>The Climate Change policy seeks to establish an understanding across Council and the Tweed community that responding to climate change is a responsible undertaking by Council to address a material risk to the Tweed community, economy and environment, and aligns with Council's powers under the Local Government Act 1993 section 8A to <i>'act fairly, ethically and without</i></p>

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	<i>bias in the interests of the local community.'</i>
Other comments:	
Prepare a Communication Engagement Strategy	Agreed. A Communication Engagement Strategy will be scoped to help develop a Climate Change Action Plan for the Tweed.
Involve a Community Panel chaired by the Council, represented by nominees of community groups with each community group representing a suburb within the Tweed Shire area	Agreed. Formation of a Community Panel will be scoped to help develop a Climate Change Action Plan for the Tweed. Council's approach to representation will be in accordance with Council's Community Engagement Strategy.
Needs more specific actions	Council officers will prepare more detailed analyses of climate response actions, costs, funding options, and timeframes for implementing them in climate risk and Climate Change Action Plan work.
Establish a Climate Change Action Plan (CCAP) that outlines mitigation and adaptation management strategies for all Council Services. The CCAP must be extended to include any community initiatives including new or enhanced asset management projects as well as community resilience initiatives.	Council officers will prepare more detailed analyses of climate response actions, costs, funding options, and timeframes for implementing them in climate risk and Climate Change Action Plan work.
The policy has completely omitted any inclusion to animal agriculture which is one the largest causes of emissions and environmental damage including soils, surface and groundwater, and biodiversity loss in general. Without including animal agriculture, Council is ignoring a significant area which is directly and substantially fuelling climate change and the climate emergency.	Agriculture, forestry and land use related emissions sources and reductions will be investigated in the development of a community-wide net zero emissions strategy for the Tweed Shire.
It is important that council supports a sustainable sugar cane industry. A 12 month PHD study showed that sugar cane in the valley was capturing 9 tons per hectare of the ambient CO <sub>2</sub> , when compared to a wetland at 1.5 tons per hectare per year. The sugar cane fields were also a methane sink, while a wetland is a methane emitter. Drainage will become even more important with the inevitable sea level rise. While the drainage is very important the time it takes for the water to drain from the field is even more important. Research shows that up to 7 days of water logging has little effect on the crop, from then on each day of water logging can reduce the crop by 7 tons per hectare per day. The sugar cane industry looks forward to working with council to support this very important environmental crop on the flood plain growing sustainably	Agriculture, forestry and land use related emissions sources and reductions will be investigated in the development of a community-wide net zero emissions strategy for the Tweed Shire.  In the July 2012 Australian Government Issues Paper: The role of wetlands in the carbon cycle, wetlands in coastal areas, particularly mangroves, are reported as high biomass production with methane emissions limited by salinity. Carbon storage has been estimated at ~240 tonnes C per ha to 1m depth in vegetated freshwater wetlands such as melaleuca forests, and ~550 tonnes C per ha to 1m depth in mangrove swamps.  <a href="https://www.environment.gov.au/system/files/resources/b55b1fe4-7d09-47af-96c4-6cbb5f106d4f/files/wetlands-role-carbon-cycle.pdf">https://www.environment.gov.au/system/files/resources/b55b1fe4-7d09-47af-96c4-6cbb5f106d4f/files/wetlands-role-carbon-cycle.pdf</a>
One way to meet Community expectations and target reduced green house emissions would be to encourage/stop Sugar Cane farmers from burning sugar cane and use green harvest methods. And for Condong mill to definitely not use chipped wood from native forests to fuel its electricity. It's not sustainable, nor supports the idea that reforestation is one of the keys to storing carbon in the ground and help mitigate climate change.	Agriculture, forestry and land use related emissions sources and reductions will be investigated in the development of a community-wide net zero emissions strategy for the Tweed Shire.
Council should take on a leadership role in ensuring food security and energy security. I would also like to see as a goal that Council will intentionally work with neighbouring municipalities to support each other in key areas of vulnerability such as water, food and energy security.	The Northern Rivers Joint Organisation is a cooperative body of Northern Rivers councils working together on common projects and initiatives including energy security.  Climate change related impacts on food security will be investigated as part of the Climate Change risk review, and is also addressed in Priority 8:  <ul style="list-style-type: none"> <li>Support systems for emergency preparedness, communication, response and recovery activities, including rapid assessment and restoration of key public assets following natural disasters.</li> </ul>
Some suggestions for fire resilience would be to investigate and promote the use of Indigenous Fire Stick burning knowledge in the appropriate season in co operation with National Parks, not just relying on the RFS.	Climate change related impacts on bush fire risk, and effective ways to control that risk, will be investigated as part of the Climate Change risk review. All controlled burns are undertaken in partnership with the Rural Fire Service.